



COMMONWEALTH OF PENNSYLVANIA

February 18, 2025

E-FILED

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Joint Application of Pennsylvania American Water Company and Corner Water Supply and Service Corporation Pursuant to Section 1102 of the Public Utility Code, for approval of (1) the transfer to Pennsylvania American Water Company, by sale, of all property of Corner Water Supply and Service Corporation used and useful in the public service; (2) the right of Pennsylvania-American Water Company to begin to offer, render, furnish and supply water service to the public in portions of Elk and Paint Townships in Clarion County, Pennsylvania, and (3) the abandonment by Corner Water Supply and Service Corporation of all water service / Docket Nos. A-2025-3052745 and A-2025-3052747

Dear Secretary Chiavetta:

Enclosed for filing please find the Prehearing Memorandum, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Kevin Higgins
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Pennsylvania	:	Docket Nos. A-2025-3052745
American Water Company and Corner	:	A-2025-3052747
Water Supply and Service Corporation	:	
Pursuant to Section 1102 of the Public	:	
Utility Code, for approval of: (1) the	:	
transfer to Pennsylvania American Water	:	
Company, by sale, of all property of	:	
Corner Water Supply and Service	:	
Corporation used and useful in the public	:	
service; (2) the right of Pennsylvania-	:	
American Water Company to begin to	:	
offer, render, furnish and supply water	:	
service to the public in portions of Elk and	:	
Paint Townships in Clarion County,	:	
Pennsylvania, and (3) the abandonment	:	
by Corner Water Supply and Service	:	
Corporation of all water service	:	

**PREHEARING MEMORANDUM
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). In order to discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to these proceedings. Representing the OSBA in the above-captioned matters are Assistant Small Business Advocates Rebecca Lyttle and Steven C. Gray. Please address all correspondence in

that matter as follows:

Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
relyttle@pa.gov

Steven C. Gray, Esq.
Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

II. FILING BACKGROUND

On December 31, 2024, Pennsylvania-American Water Company and Corner Water Supply and Service Corporation (the “Joint Applicants”) filed an Application Pursuant to Section 1102 of the Public Utility Code, for approval of (1) the transfer to Pennsylvania-American Water Company (“PAWC”), by sale, of all property of Corner Water Supply and Service Corporation (“Corner Water”) used and useful in the public service; (2) the right of Pennsylvania-American Water Company to begin to offer, render, furnish and supply water service to the public in portions of Elk and Paint Townships in Clarion County, Pennsylvania, and (3) the abandonment by Corner Water Supply and Service Corporation of all water service.

The OSBA filed an Amended Protest and Notice of Intervention on January 29, 2025.

III. IDENTIFICATION OF WITNESS AND TENTATIVE ISSUES

Assisting in the development and presentation of the OSBA’s case in this proceeding will be:

Kevin C. Higgins
Energy Strategies
111 East Broadway, Suite 1200
Salt Lake City, Utah 84111
(801) 355-4365
khiggins@energystrat.com

The OSBA will participate in this proceeding to assure that the interests of small business customers are adequately represented and protected.

After an initial review of the materials submitted by the Joint Applicants, the OSBA has identified the following list of issues that it will evaluate in this proceeding:

- (1) Whether the proposed transaction will result in the provision of safe, adequate, and reasonable service at just and reasonable rates for the small business customers of both PAWC and Corner Water.
- (2) Whether the water service rates will increase for PAWC's and Corner Water's small business customers.
- (3) Whether Corner Water's small business customers will receive information about the OSBA on any late payment notices that they may receive.
- (4) Whether the proposed transaction will result in substantial affirmative benefits for the customers of PAWC and Corner Water.
- (5) Whether PAWC's formal payment assistance program for small businesses will be extended to the small business customers currently served by Corner Water.

The OSBA reserves the right to pursue additional issues that may arise throughout this proceeding.

IV. SERVICE OF DOCUMENTS

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents on the due date¹ as satisfying the in-hand requirement.

The OSBA requests that email delivery of documents also be provided to its witness identified above.

In addition to email copies of pleadings, briefs, and exceptions, the OSBA requests email copies of responses to discovery propounded by the OSBA or any other party.

V. SETTLEMENT

The OSBA notes its willingness to enter settlement discussions at the appropriate phase of this proceeding.

VI. HEARING AND BRIEFING SCHEDULE

At the time of this writing, the OSBA is working with the parties to develop a procedural schedule.

Respectfully submitted,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA. 17101

Dated: February 18, 2025

¹ In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Pennsylvania	:	Docket No. A-2025-3052745
American Water Company and Corner	:	A-2025-3052747
Water Supply and Service Corporation	:	
Pursuant to Section 1102 of the Public	:	
Utility Code, for approval of: (1) the	:	
transfer to Pennsylvania American	:	
Water Company, by sale, of all property	:	
of Corner Water Supply and Service	:	
Corporation used and useful in the	:	
public service; (2) the right of	:	
Pennsylvania-American Water	:	
Company to begin to offer, render,	:	
furnish and supply water service to the	:	
public in portions of Elk and Paint	:	
Townships in Clarion County,	:	
Pennsylvania, and (3) the abandonment	:	
by Corner Water Supply and Service	:	
Corporation of all water service	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable Emily DeVoe
Administrative Law Judge
PA Public Utility Commission
Office of Administrative Law Judge
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edevoe@pa.gov

Allison Kaster, Esquire
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Date: February 18, 2025

/s/ Steven C. Gray

Senior Attorney
Assistant Small Business Advocate
Attorney I.D. No. 77538