



COMMONWEALTH OF PENNSYLVANIA

April 17, 2025

E-FILED

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

Re: Application of Aqua Pennsylvania Wastewater, Inc. (hereinafter referred to as “Aqua”) Pursuant to Section 1102 of the Public Utility Code, for Approval of: (1) the Acquisition by Aqua of the Wastewater System Assets of Breyer Master Association, Breyer Court Condominium Association, Breyer Woods Condominium Association, One Breyer Estates Condominium Association, and Salus University Situated Within a Portion of Cheltenham Township, Montgomery County, Pennsylvania; and (2) the Right of Aqua to Begin to Offer, Render, Furnish and Supply Wastewater Service to the Public in a Portion of Cheltenham Township, Montgomery County, Pennsylvania, Nunc Pro Tunc / Docket No. A-2025-3054123

Dear Secretary Chiavetta:

Enclosed please find the Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

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

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

Sincerely,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures

cc: Jason Hails
Roger Cathcart
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of Aqua Pennsylvania Wastewater, :
Inc. (hereinafter referred to as “Aqua”) :
Pursuant to Section 1102 of the Public Utility : Docket No. A-2025-3054123
Code, for Approval of: (1) the Acquisition by :
Aqua of the Wastewater System assets of Breyer :
Master Association, Breyer Court Condominium :
Association, Breyer Woods Condominium :
Association, One Breyer Estates Condominium :
Association, and Salus University Situated :
Within a Portion of Cheltenham Township, :
Montgomery County, Pennsylvania; and :
(2) the Right of Aqua to Begin to Offer, Render, :
Furnish and Supply Wastewater Service to the :
Public in a Portion of Cheltenham Township, :
Montgomery County, Pennsylvania, :
Nunc Pro Tunc :**

**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Application of Aqua Pennsylvania Wastewater, Inc. pursuant to Section 1102 of the Public Utility Code for Approval of its Acquisition of the Wastewater System Assets of Breyer Master Association, Breyer Court Condominium Association, Breyer Woods Condominium Association, One Breyer Estates Condominium Association, and Salus University that was filed with the Pennsylvania Public Utility Commission (“Commission”) on March 21, 2025. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

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

Respectfully submitted,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

For:
NazAarah Sabree
Small Business Advocate

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

Date: April 17, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Application of Aqua Pennsylvania Wastewater, :
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Public in a Portion of Cheltenham Township, :
Montgomery County, Pennsylvania, :
Nunc Pro Tunc :**

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Notice of Intervention (“NOP”) in the Application of Aqua Pennsylvania Wastewater, Inc. pursuant to Section 1102 of the Public Utility Code for Approval of its Acquisition of the Wastewater System Assets of Breyer Master Association, Breyer Court Condominium Association, Breyer Woods Condominium Association, One Breyer Estates

Condominium Association, and Salus University that was filed with the Pennsylvania Public Utility Commission (“Commission”) on March 21, 2025.

The Small Business Advocate files this NOI to protect the interests of the small business customers that could be affected by the acquisition set forth in the Application.


The Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the acquisition set forth in the Application. The Small Business Advocate will ask the Commission to deny any aspect of the Application that is not proven to be lawful, just, reasonable, and non-discriminatory.

Dated: April 17, 2025

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: April 17, 2025



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Public in a Portion of Cheltenham Township, :
Montgomery County, Pennsylvania, :
Nunc Pro Tunc :**

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 Charles E. Rainey, Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
crainey@pa.gov

Darryl Lawrence, Esquire
Interim Acting Consumer Advocate
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Forum Place
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Allison Kaster, Esquire
Director
Bureau of Investigation & Enforcement
400 North Street
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Harrisburg, PA 17120
akaster@pa.gov

Alexander R. Stahl, Esquire
Aqua Pennsylvania Wastewater, Inc.
762 West Lancaster Avenue
Bryn Mawr, PA 19010
astahl@aquaamerica.com

Date: April 17, 2025

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399