

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

FORWARD TOWNSHIP,
Petitioner,

A-2025-3052983

RE: Application of Pennsylvania-American Water Company under Sections 1102(a) and 1329 of the Pennsylvania Public Utility Code, 66 Pa C.S. § § 1102(a) and 1329, for approval of: (1) the transfer, by sale, to Pennsylvania-American Water Company, of substantially all of the assets, properties and rights related to the wastewater treatment plant and collection system owned and operated by the Elizabeth Borough Municipal Authority, and (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the Borough of Elizabeth, Allegheny County, Pennsylvania /
Docket No. A-2025-3052983

PETITION TO INTERVENE

Filed on behalf of:
Forward Township, Petitioner.

Counsel of Record for this
Party:

Maurice A. Nernberg
Pa. I.D. No. 00127
David M. Nernberg
Pa. I.D. No. 205631

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Firm No. 331

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RE: Application of Pennsylvania-American Water Company under Sections 1102(a) and 1329 of the Pennsylvania Public Utility Code, 66 Pa C.S. § § 1102(a) and 1329, for approval of:(1) the transfer, by sale, to Pennsylvania-American Water Company, of substantially all of the assets, properties and rights related to the wastewater treatment plant and collection system owned and operated by the Elizabeth Borough Municipal Authority, and (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the Borough of Elizabeth, Allegheny County, Pennsylvania /
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PETITION TO INTERVENE

Pursuant to 52 PA Code § 5.71, et seq., Forward Township hereby files this Petition to Intervene in the above-captioned proceeding. In support thereof, Forward Township submits as follows:

1. The name and contact information of the Petitioner is as follows:

Forward Township
3000 Golden Circle
Elizabeth, PA 15037
(724) 344-8082
fwdtwpl@comcast.net

David M. Nernberg; Maurice A Nernberg
Maurice A. Nernberg & Associates
301 Smithfield Street
(412)232-0334
dmn@nernberg.com; man@nernberg.com

2. Forward Township is party to an agreement involved in the transfer, is provided services from the utility involved in the transfer, would be subject to increased rates and expenses

involved in the transfer, and would be impacted by an inequitable distribution of sales proceeds involved in the transfer.

3. The existing participants represent only some of the ratepayers and not the interest of Forward Township.

4. Any decision would impact Forward Township and its ratepayers as its expenses and rates would be increased, further, Forward Township would not be paid its fair equitable share of any sales proceeds.

WHEREFORE, Forward Township respectfully requests that the application be denied as more fully stated in its Protest Application to be filed.

Respectfully Submitted,
MAURICE A. NERNBERG & ASSOCATES

Date: 04/21/25

By: 
David M. Nernberg, Esq.

CERTIFICATE OF SERVICE

I, David M. Nernberg, hereby certify that a true and correct copy of the within **Petition to Intervene** was served upon all parties to the within matter, this date, via email and first-class mail, addressed as follows:

Via email and first-class mail:

The Honorable Charles E. Rainey, Jr.
Chief Administrative Law Judge
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CRainey@PA.gov

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Date: 04/21/25



David M. Nernberg, Esq.