

**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

**NOTICE TO PLEAD**

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

Maurice A. Nernberg & Associates  
301 Smithfield Street  
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Firm No. 331

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**NOTICE TO PLEAD**

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YOU ARE HEREBY ADVISED THAT YOU MAY ANSWER THE ENCLOSED PETITION TO INTERVENE WITHIN TWENTY (20) DAYS OF THE DATE OF SERVICE HEREOF. YOUR ANSWER TO THE PETITION TO INTERVENE MUST BE FILED WITH THE SECRETARY OF THE PENNSYLVANIA PUBLIC UTILITY COMMISSION, P.O. BOX 3265, HARRISBURG, PA 17105-3265. A COPY SHOULD ALSO BE SERVED ON THE UNDERSIGNED COUNCIL FOR FORWARD TOWNSHIP.

Respectfully Submitted,  
MAURICE A. NERNBERG & ASSOCAITES

By: \_\_\_\_\_

  
David M. Nernberg, Esq.  
Pa. I.D. No. 205631  
Maurice A. Nernberg & Associates  
301 Smithfield Street  
Pittsburgh, PA 15222  
412-232-0334  
[dmn@nernberg.com](mailto:dmn@nernberg.com)

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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  
[fwdtwpl1@comcast.net](mailto:fwdtwpl1@comcast.net)

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

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  
Pennsylvania Public Utility Commission  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[CRainey@PA.gov](mailto:CRainey@PA.gov)

Darryl Lawrence  
Interim Acting Consumer Advocate  
PA Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101  
[DLawrence@paoca.org](mailto:DLawrence@paoca.org)

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852 Wesley Drive  
Mechanicsburg, PA 17055  
[Teresa.Harrold@AMWater.com](mailto:Teresa.Harrold@AMWater.com)

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Rebecca Lyttle  
Office of Small Business Advocate  
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555 Walnut Street, 1<sup>st</sup> Floor  
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[SGray@PA.gov](mailto:SGray@PA.gov)  
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Harrisburg, PA 17120  
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Harrisburg, PA 17101  
[DZambito@Cozen.com](mailto:DZambito@Cozen.com)  
[JNase@Cozen.com](mailto:JNase@Cozen.com)

Date: 04/21/25

  
\_\_\_\_\_  
David M. Nernberg, Esq.

## CERTIFICATE OF SERVICE

I, David M. Nernberg, hereby certify that a true and correct copy of the within **Notice to Plead** was served upon all parties to the within matter, this date, in the manner described below, addressed as follows:

### Via email:

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](mailto:CRainey@PA.gov)

Darryl Lawrence  
Interim Acting Consumer Advocate  
PA Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101  
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Katie M. Kennedy  
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400 North Street  
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[DZambito@Cozen.com](mailto:DZambito@Cozen.com)  
[JNase@Cozen.com](mailto:JNase@Cozen.com)

Date: 05/14/25

  
\_\_\_\_\_  
David M. Nernberg, Esq.