

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**NOTICE TO PLEAD**

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YOU ARE HEREBY ADVISED THAT PURSUANT TO 52 PA. CODE § 5.66, 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 COUNSEL FOR THE GREENVILLE MUNICIPAL WATER AUTHORITY.



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James E. Douglas, Esquire  
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Hermitage, PA 16148  
[jedouglas@douglasjoseph.com](mailto:jedouglas@douglasjoseph.com)

Dated: July 2, 2025

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Aqua Pennsylvania, Inc. (hereinafter referred to as “Aqua” or “Applicant”) pursuant to Sections 1102 and 1329 of the Public Utility Code for: (1) approval of the acquisition by Aqua of the water system assets of the Greenville Municipal Water Authority (“GWA”) situated within the Borough of Greenville, Hempfield Township, and West Salem Township, Mercer County, Pennsylvania; (2) approval of the right of Aqua to begin to offer, render, furnish and supply water service to the public in the Borough of Greenville, Hempfield Township, and West Salem Township, Mercer County, Pennsylvania; and (3) an Order approving the acquisition that includes the ratemaking rate base of the GWA water system assets pursuant to Section 1329 (c) (2) of the Public Utility Code. Request for Approval of Contracts, including Assignments of Contracts, between Aqua and the GWA, Pursuant to Section 507 of the Public Utility Code

Docket No.: A-2024-3049015

**PETITION TO INTERVENE**

**ON BEHALF OF THE GREENVILLE MUNICIPAL WATER AUTHORITY**

Pursuant to 52 PA Code §§ 5.71, 5.72, and 5.74, The Greenville Municipal Water Authority of the Borough of Greenville (“Authority”), by and through its attorneys, James E. Douglas and Douglas, Joseph, & Olson, hereby files with the Pennsylvania Public Utility Commission (the “Commission”) this Petition to Intervene in the above-captioned Application of Aqua Pennsylvania, Inc. (“Aqua”) for approval of (1) acquisition by Aqua of the water system assets of

The Greenville Municipal Water Authority, organized under the Municipal Authorities Act and the laws of the Commonwealth of Pennsylvania, situated within the Borough of Greenville, Mercer County, Pennsylvania, (2) the rights of Aqua to offer, render, furnish service to the public in Greenville Borough, Mercer County, Pennsylvania, (3) an Order approving the acquisition that includes the ratemaking rate base of the Borough and The Greenville Municipal Water Authority pursuant to Section 1329 (c) (2) of the Public Utility Code, and (4) Approval of Certain Municipal Contracts under Section 507 of the Public Utility Code.

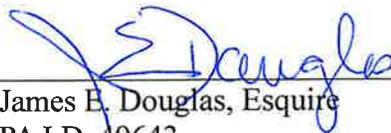
The Application directly affects the interests of the Authority which are not adequately represented by any existing Party. For the reasons that follow, the Greenville Municipal Water Authority respectfully requests that the Commission grant its Petition to Intervene, and in support thereof avers as follows:

1. The Greenville Municipal Water Authority is located in the Borough of Greenville, Mercer County Pennsylvania, with a business address of 44 Clinton Street, Greenville, Pennsylvania 16125.
2. The Greenville Municipal Water Authority owns that certain treatment and distribution system (“The System”) that provides public water service to various customers in Greenville Borough, Hempfield Township, West Salem Township, and Sugar Grove Township in Mercer County, Pennsylvania.
3. The Greenville Municipal Water Authority is a Party to the Agreement for which Aqua seeks approval to acquire the Authority’s assets, properties and rights related to the System serving, inter alia, the customers of Greenville Municipal Authority.
4. The Greenville Municipal Water Authority supports the Application for Approval filed by Aqua.

5. The Greenville Municipal Water Authority seeks intervention in the proceedings for due cause shown as follows:
  - a) The Authority is a Party to the asset Purchase Agreement (the “APA”), dated September 26, 2023, which sets forth the terms and conditions for the sale of the System,
  - b) Aqua’s Application relies on the Authority’s consent to the sale of the System.
6. The Authority has a substantial and bona fide interest in the subject matter of the pending Application and its interests cannot be represented or protected adequately by other Parties.
7. As a Party to the APA, The Greenville Municipal Water Authority submits that its Intervention is in the public’s interest.
8. Greenville Municipal Water Authority intends to play an active role in the Commission’s decision-making process and its participation herein will not unduly prejudice any Party.

WHEREFORE, The Greenville Municipal Water Authority respectfully requests that the Commission grant its Petition to Intervene in this proceeding.

Respectfully Submitted,



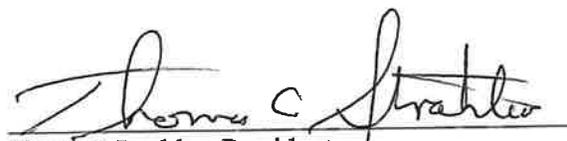
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Dated: July 2, 2025

VERIFICATION

I, Thomas Strahler, President/chairman of the Greenville Municipal Water Authority hereby verify that the statements of fact made in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same. I understand that the statements made herein are subject to the penalties of 18 PA C.S. § 4904 (relating to unsworn falsification to authorities).

  
Thomas Strahler, President

Dated: 7.2.25

**CERTIFICATE OF SERVICE**

Application of Aqua Pennsylvania, Inc. :  
(hereinafter referred to as “Aqua” or “Applicant”) :  
pursuant to Sections 1102 and 1329 of the Public :  
Utility Code for: (1) approval of the acquisition :  
by Aqua of the water system assets of the :  
Greenville Municipal Water Authority (GWA) :  
Situated within the Borough of Greenville, : Docket No.: A-2024-3049015  
Hempfield Township, and West Salem Township, :  
Mercer County, Pennsylvania; (2) approval of the :  
Right of Aqua to begin to offer, render, furnish and :  
supply water service to the public in the :  
Borough of Greenville, Hempfield Township, :  
and West Salem Township, Mercer County, :  
Pennsylvania; and (3) an order approving the :  
acquisition that includes the ratemaking rate :  
base of the GWA water system assets :  
pursuant to Section 1329 (c)(2) of the Public :  
Utility Code. Request for Approval of Contracts, :  
including Assignments of Contracts, between :  
Aqua and the GWA, pursuant to Section 507 of :  
the Public Utility Code :

I hereby certify that I have this day served true copies of the following documents, Petitions to Intervene, on behalf of the Greenville Municipal Water Authority and the Borough of Greenville, upon the Parties of Record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

**SERVICE BY E-MAIL ONLY**

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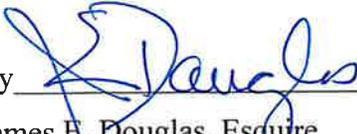
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Dated this 9th day of July, 2025.

By   
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On behalf of the Greenville Municipal Water  
Authority and The Borough of Greenville  
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