

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

NOTICE TO PLEAD

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 BOROUGH OF GREENVILLE.



James E. Douglas, Esquire
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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 BOROUGH OF GREENVILLE

Pursuant to 52 PA Code §§ 5.71, 5.72, and 5.74, the Borough of Greenville of Mercer County, organized under the laws of the Commonwealth of Pennsylvania (“Greenville Borough”), 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 operated by the Greenville Municipal Water Authority, and

owned by the Greenville Municipal Water Authority, situated within the Borough of Greenville, Mercer County, Pennsylvania, (2) the rights of Aqua to offer, render, furnish services to the public in Greenville Borough, Mercer County, Pennsylvania, (3) an Order approving the acquisition that includes the ratemaking rate base 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 Borough of Greenville, which interests are not adequately represented by any existing Party. For the reasons that follow, The Borough of Greenville respectfully requests that the Commission grant its Petition to Intervene, and in support thereof avers as follows:

1. The Borough of Greenville is located in, Greenville, Mercer County, Pennsylvania, with a business address of 125 Main Street, Greenville, Pennsylvania 16125.
2. The Borough of Greenville and its residents are customers of the GWA water treatment and distribution system (“The System”) that provides services to various customers in the Borough of Greenville, Mercer County, Pennsylvania and neighboring communities.
3. The Borough of Greenville supports the Application filed by Aqua.
4. The Borough of Greenville has a substantial and bona fide interest in the subject matter of this Application and its interests cannot be represented or protected adequately by other Parties.
5. The Borough of Greenville submits that its Intervention is in the public interest.
6. The Borough of Greenville 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 Borough of Greenville respectfully requests that the Commission grant the instant Petition to Intervene in this proceeding.

Respectfully Submitted,



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409 N. Hermitage Road
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Dated: July 2, 2025

VERIFICATION

I, Paul Hamill, Mayor of the Borough of Greenville, 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).


Paul Hamill, Mayor

Dated: July 7, 2025

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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Dated this 9th day of July, 2025.

By  _____

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