



Erin K. Fure

Director, Corporate Counsel
852 Wesley Drive | Mechanicsburg, PA 17055
Phone: 717-550-1556 | Fax: 717-550-1255
erin.fure@amwater.com

July 16, 2025

VIA eFiling

Matthew L. Homsher, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

In Re: In re: Application of Appalachian Utilities, Inc. for a Certificate of Public Convenience Evidencing the Pennsylvania Public Utility Commission's Approval of the Transfer of 40% of Outstanding and Issued Stock in Appalachian Utilities, Inc.

Docket No.: A-2024-3046068

Joint Application of Pennsylvania-American Water Company and Appalachian Utilities, Inc., Pursuant to Section 1102 of the Public Utility Code, for approval of (1) the transfer to American Water Works Company, Inc., by merger, of all property of Appalachian Utilities, Inc. used and useful in the public service; (2) the transfer to Pennsylvania-American Water Company, by merger, of all property of Appalachian Utilities, Inc. used or useful in the public service, (3) the right of Pennsylvania-American Water Company to begin to offer, render, furnish and supply water service to the public in the Borough of Avis and Townships of Pine Creek and Dunnstable, Clinton County, Pennsylvania, and (4) the abandonment by Appalachian Utilities, Inc. of all water service

Docket Nos. A-2024-3046084, A-2024-3046092

Dear Secretary Homsher:

On behalf of Pennsylvania-American Water Company and Appalachian Utilities, Inc., I am forwarding the Joint Applicants' Comments in response to the Pennsylvania Public Utility Commission's Order dated July 8, 2025, Ordering Paragraph 3.

Copies of the Joint Comments have been served on the parties as indicated on the enclosed Certificate of Service.

If you have any questions, please contact me.

Sincerely,

Erin K. Fure

Enclosures

cc: The Honorable Charles E. Rainey, Jr., Chief Administrative Law Judge w/Encs. **VIA** Email Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Appalachian Utilities, :
Inc. for a Certificate of Public Convenience :
Evidencing the Pennsylvania Public Utility : Docket No. A-2024-3046068
Commission’s Approval of the Transfer of :
40% of Outstanding and Issued Stock in :
Appalachian Utilities, Inc. :

Joint Application of Pennsylvania-American :
Water Company and Appalachian Utilities, :
Inc., Pursuant to Section 1102 of the Public : Docket Nos. A-2024-3046084
Utility Code, for approval of (1) the transfer : A-2024-3046092
to American Water Works Company, Inc., by :
merger, of all property of Appalachian :
Utilities, Inc. used and useful in the public :
service; (2) the transfer to Pennsylvania- :
American Water Company, by merger, of all :
property of Appalachian Utilities, Inc. used or :
useful in the public service, (3) the right of :
Pennsylvania-American Water Company to :
begin to offer, render, furnish and supply :
water service to the public in the Borough of :
Avis and Townships of Pine Creek and :
Dunnstable, Clinton County, Pennsylvania, :
and (4) the abandonment by Appalachian :
Utilities, Inc. of all water service :

**JOINT COMMENTS OF PENNSYLVANIA-AMERICAN
WATER COMPANY AND APPALACHIAN UTILITIES, INC.**

AND NOW COMES PENNSYLVANIA-AMERICAN WATER COMPANY (“PAWC”) AND APPALACHIAN UTILITIES, INC. (“APPALACHIAN”) (collectively, the “Joint Applicants”) to file these Joint Comments in response to the Opinion and Order entered by the Pennsylvania Public Utility Commission (“Commission”) on July 8, 2025 (the “July 2025 Order”).

In Ordering Paragraph 3, the July 2025 Order states:

3. That within ten (10) days of the entry date of this Opinion and Order, Pennsylvania-American Water Company and Appalachian Utilities, Inc. shall file written comments justifying the confidential treatment of the asset purchase agreement price or requesting removal of the confidential designation of the asset purchase agreement price.

The Joint Applicants respectfully request removal of the confidential designation of the merger consideration listed in the Agreement and Plan of Merger, attached as Appendix B to the Joint Application filed by PAWC and Appalachian.

The Joint Applicants understand that all other parties to this proceeding may file Reply Comments responding to the issues raised and the subject matter discussed in these Joint Comments. The deadline for filing those Reply Comments is fifteen (15) days after the entry date of the July 2025 Order. July 2025 Order, Ordering Paragraph 4.

The Joint Applicants further understand that the Commission will review the Joint Comments and Reply Comments and will prepare an Opinion and Order to be considered at a future public meeting. July 2025 Order, Ordering Paragraph 5.¹

[Signatures appear on the next page.]

¹ With the filing of these Joint Comments, the Joint Applicants withdraw their Letter in Lieu of Comments, dated June 20, 2025, and their request for expedited consideration of the matter.

Appalachian Utilities, Inc.

/s/ Thomas J. Sniscak
Thomas J. Sniscak, Esq. (PA ID No. 99891)
Todd S. Stewart, Esq. (PA ID No. 33891)
HMS Legal LLP
501 Corporate Circle, Suite 302 Harrisburg,
PA 17110
Telephone: (717) 236-1300
E-mail: tjsniscak@hmslegal.com
E-mail: tsstewart@hmslegal.com

Counsel for *Appalachian Utilities, Inc.*

Date: July 16, 2025

Respectfully submitted,

Pennsylvania-American Water Company


Erin Fure, Esq. (PA ID No. 312245)
Director, Corporate Counsel
American Water
852 Wesley Drive
Mechanicsburg, PA 17055
Telephone: (717) 550-1556
E-mail: erin.fure@amwater.com

Counsel for *Pennsylvania-American Water Company*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Appalachian Utilities, Inc. :
for a Certificate of Public Convenience :
Evidencing the Pennsylvania Public Utility : Docket No. A-2024-3046068
Commission's Approval of the Transfer of 40% :
of Outstanding and Issued Stock in :
Appalachian Utilities, Inc. :

Joint Application of Pennsylvania-American :
Water Company and Appalachian Utilities, :
Inc., Pursuant to Section 1102 of the Public :
Utility Code, for approval of (1) the transfer to :
American Water Works Company, Inc., by :
merger, of all property of Appalachian Utilities, :
Inc. used and useful in the public service; :
(2) the transfer to Pennsylvania-American : Docket Nos. A-2024-3046084,
Water Company, by merger, of all property of : A-2024-3046092
Appalachian Utilities, Inc. used or useful in the :
public service, (3) the right of Pennsylvania- :
American Water Company to begin to offer, :
render, furnish and supply water service to the :
public in the Borough of Avis and Townships of :
Pine Creek and Dunnstable, Clinton County, :
Pennsylvania, and (4) the abandonment by :
Appalachian Utilities, Inc. of all water service :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the Joint Comments of Pennsylvania-American Water Company and Appalachian Utilities, Inc., upon the persons and in the manner indicated below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA Electronic Delivery

Melanie El Atieh
Deputy Consumer Advocate
PA Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
melatieh@paoca.org

Steven C. Gray
Senior Attorney
PA Office of Small Business Advocate
555 Walnut Street, 1st Floor, Forum Place
Harrisburg, PA 17101
sgray@pa.gov

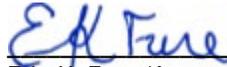
David P. Zambito, Esquire
Jonathan P. Nase, Esquire
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
dzambito@cozen.com
jnase@cozen.com

Thomas J. Sniscak, Esquire
Todd S. Stewart, Esquire
Hawke McKeon & Sniscak LLP
100 North 10th Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
tsstewart@hmslegal.com

Morgan N. DeAngelo
Regulatory Analyst
PA Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
MDeAngelo@paoca.org

Kevin Higgins
Energy Strategies
111 East Broadway, Suite 1200
Salt Lake City, UT 84111
khiggins@energystrat.com
Consultant for OSBA

Dated: July 16, 2025



Erin K. Fure (Attorney I.D. No. 312245)
Director, Corporate Counsel
Pennsylvania-American Water Company
852 Wesley Drive, Mechanicsburg, PA 17055
Office: 717.550.1556
erin.fure@amwater.com