

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: Application of Pennsylvania-American Water :
Company under Section 1102(a) of the Pennsylvania :
Public Utility Code, 66 Pa. C.S. § 1102(a), for approval : Docket No. A-2025-3056563
of (1) the transfer, by sale, of substantially all of the :
Sutersville-Sewickley Municipal Sewage Authority’s :
assets, properties and rights related to its sanitary sewage :
collection and conveyance system to Pennsylvania- :
American Water Company; and (2) the right of :
Pennsylvania-American Water Company to begin to :
offer and furnish wastewater service to the public in the :
Borough of Sutersville and in portions of Sewickley :
Township, Westmoreland County, Pennsylvania :

PETITION TO INTERVENE

Pursuant to 52 Pa. Code §§ 5.71, 5.72 and 5.74, the Sutersville-Sewickley Municipal Sewage Authority (“SSMSA”), by and through its attorneys, Obermayer Rebmann Maxwell & Hippel LLP, hereby files with the Pennsylvania Public Utility Commission (the “Commission”) this Petition to Intervene in the above-captioned Application of Pennsylvania-American Water Company (“Pennsylvania-American”) for approval to acquire the wastewater collection and conveyance system of SSMSA (the “System”). The Application directly affects the interests of SSMSA, as the owner of the System to be acquired, which are not adequately represented by any existing party.

For the reasons that follow, SSMSA respectfully requests that the Commission grant its Petition to Intervene, and in support thereof avers as follows:

1. SSMSA is a municipal authority which owns, maintains, and operates the System that serves approximately twelve (12) commercial, two (2) municipal, and four-hundred seventy-six (476) residential customers in Westmoreland County (“Service Area”).

2. SSMSA's business address is 826 Curry Road, Sutersville, Pennsylvania.
3. SSMSA is interested in the above-captioned docket as a party to the agreement under which Pennsylvania-American seeks approval to acquire the System.
4. SSMSA supports the Application filed by Pennsylvania-American at this docket.
5. 52 Pa. Code § 5.72 sets forth the eligibility requirements for a party to intervene and provides in part as follows:

(a) Persons. A petition to intervene may be filed by a person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate to the administration of the statute under which the proceeding is brought. The right or interest may be one of the following:

(1) A right conferred by statute of the United States or of the Commonwealth.

(2) An interest which may be directly affected, and which is not adequately represented by existing participants, and as to which the petitioner may be bound by the action of the Commission in the proceeding.

(3) Another interest of such nature that participation of the petitioner may be in the public interest.

6. SSMSA seeks intervention in the proceeding for due cause shown for the following reasons:

(a) SSMSA is a party to the Asset Purchase Agreement (the "APA") whereby Pennsylvania-American agreed to purchase SSMSA's System, which provides public sanitary sewage collection and conveyance services to approximately four-hundred seventy-six (476) residential, two (2) municipal, and twelve (12) commercial customers in the Service Area;

(b) Pennsylvania-American's Application relies on the SSMSA's consent to the sale of the System.

7. SSMSA has a substantial and bona fide interest in the subject matter of this docket and its interests cannot be represented or protected adequately by other existing parties to this docket.

8. As a party to the APA, SSMSA submits that its intervention is in the public interest.

9. SSMSA 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 Sutersville-Sewickley Municipal Sewage Authority respectfully requests that the Commission grant the instant Petition to Intervene in this proceeding.

Respectfully submitted,

/s/ Thomas Wyatt

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*Counsel for Sutersville-Sewickley Municipal
Sewage Authority*

Dated: August 22, 2025

I, Bruce Riley, the Chairperson of the Sutersville-Sewickley Municipal Sewage Authority, hereby verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Bruce Riley

Dated: 21 Aug 25

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Dated: August 22, 2025