



COMMONWEALTH OF PENNSYLVANIA

December 16, 2025

**E-FILED**

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

**Re: Joint Application of American Water Works Company, Inc., Essential Utilities, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC, and Alpha Merger Sub, Inc. for a Certificate of Public Convenience under Sections 1102(a)(3) and 2210(c) of the Public Utility Code and All Other Necessary Approvals to Effect a Change of Control of Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., and Peoples Natural Gas Company LLC / Docket Nos. A-2025-3058927, A-2025-3058928, A-2025-3058929**

Dear Secretary Homsher:

Enclosed please find the Notice of Intervention, Public Statement, and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceedings.

Copies will be served on all known parties in these proceedings, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

*/s/ Steven C. Gray*

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: Kevin Higgins  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Joint Application of American Water</b>	:	
<b>Works Company, Inc., Essential Utilities,</b>	:	<b>Docker Nos. A-2025-3058927</b>
<b>Inc., Aqua Pennsylvania, Inc., Aqua</b>	:	<b>A-2025-3058928</b>
<b>Pennsylvania Wastewater, Inc., Peoples</b>	:	<b>A-2025-3058929</b>
<b>Natural Gas Company LLC, and Alpha</b>	:	
<b>Merger Sub, Inc. for a Certificate of Public</b>	:	
<b>Convenience under Sections 1102(a)(3)</b>	:	
<b>and 2210(c) of the Public Utility Code</b>	:	
<b>and All Other Necessary Approvals to</b>	:	
<b>Effect a Change of Control of Aqua</b>	:	
<b>Pennsylvania, Inc., Aqua Pennsylvania</b>	:	
<b>Wastewater, Inc., and Peoples Natural</b>	:	
<b>Gas Company LLC</b>	:	

---

**NOTICE OF INTERVENTION  
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

---

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the Joint Application of American Water Works Company, Inc., Essential Utilities, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC, and Alpha Merger Sub, Inc. for a Certificate of Public Convenience under Sections 1102(a)(3) and 2210(c) of the Public Utility Code and All Other Necessary Approvals to Effect a Change of Control of Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., and Peoples Natural Gas Company LLC that was filed with the Pennsylvania Public Utility Commission (“Commission”) on November 26, 2025. In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.
2. Representing the OSBA in this proceeding is:

Steven C. Gray, Esq.  
Senior Attorney  
Assistant Small Business Advocate  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
[sgray@.pa.gov](mailto:sgray@.pa.gov)

Respectfully submitted,

*/s/ Steven C. Gray*

---

Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney I.D. No. 77538

For:  
NazAarah Sabree  
Small Business Advocate

Commonwealth of Pennsylvania  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1st Floor  
Harrisburg, PA 17101

Date: December 16, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Joint Application of American Water</b>	:	
<b>Works Company, Inc., Essential Utilities,</b>	:	<b>Docker Nos. A-2025-3058927</b>
<b>Inc., Aqua Pennsylvania, Inc., Aqua</b>	:	<b>A-2025-3058928</b>
<b>Pennsylvania Wastewater, Inc., Peoples</b>	:	<b>A-2025-3058929</b>
<b>Natural Gas Company LLC, and Alpha</b>	:	
<b>Merger Sub, Inc. for a Certificate of Public</b>	:	
<b>Convenience under Sections 1102(a)(3)</b>	:	
<b>and 2210(c) of the Public Utility Code</b>	:	
<b>and All Other Necessary Approvals to</b>	:	
<b>Effect a Change of Control of Aqua</b>	:	
<b>Pennsylvania, Inc., Aqua Pennsylvania</b>	:	
<b>Wastewater, Inc., and Peoples Natural</b>	:	
<b>Gas Company LLC</b>	:	

---

**PUBLIC STATEMENT OF  
THE OFFICE OF SMALL BUSINESS ADVOCATE**

---

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court. This public statement relates to the filing today by the Small Business Advocate of a Notice of Intervention (“NOI”) in the Joint Application of American Water Works Company, Inc., Essential Utilities, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC, and Alpha Merger Sub, Inc. for a Certificate of Public Convenience under Sections 1102(a)(3) and 2210(c) of the Public Utility

Code and All Other Necessary Approvals to Effect a Change of Control of Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., and Peoples Natural Gas Company LLC that was filed with the Pennsylvania Public Utility Commission (“Commission”) on November 26, 2025.

The Small Business Advocate files this NOI to protect the interests of all the small business customers that could be affected by the proposed transaction set forth in the Joint Application.

The Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of the proposed transaction set forth in the Joint Application. The Small Business Advocate will ask the Commission to deny any aspect of the Joint Application that is not proven to be lawful, just, reasonable, and non-discriminatory.

Dated: December 16, 2025

**VERIFICATION**

I, NazAarah Sabree, hereby state that the facts set forth herein above 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 herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: December 16, 2025

  
\_\_\_\_\_  
(Signature)



Anthony D. Kanagy, Esquire  
Garrett P. Lent, Esquire  
Hayley E. Wilburn, Esquire  
Emily S. Grecu, Esquire  
Post & Schell P.C.  
17 North Second Street, Suite 500  
Harrisburg, PA 17101  
[akanagy@postschell.com](mailto:akanagy@postschell.com)  
[glent@postschell.com](mailto:glent@postschell.com)  
[hwilburn@postschell.com](mailto:hwilburn@postschell.com)  
[egrecu@postschell.com](mailto:egrecu@postschell.com)

Meagan Moore, Esquire  
PNG Companies LLC  
375 North Shore Drive, Suite 600  
Pittsburgh, PA 15212  
[meagan.moore@peoples-gas.com](mailto:meagan.moore@peoples-gas.com)

Alexander R. Stahl, Esquire  
Aqua Pennsylvania, Inc.  
762 W. Lancaster Ave  
Bryn Mawr, PA 19010  
[Astahl@aquaamerica.com](mailto:Astahl@aquaamerica.com)

Date: December 16, 2025

/s/ Steven C. Gray  
Steven C. Gray  
Senior Attorney  
Assistant Small Business Advocate  
Attorney ID No. 77538