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VIA eFILING

January 13, 2026

Matthew L. Homsher, Secretary
Pa. Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: *Pennsylvania Public Utility Commission v. Pennsylvania-American Water Company, Docket Nos. R-2025-3057983 and R-2025-3058051*

Dear Secretary Homsher:

Attached please find Cleveland-Cliffs Steel's Petition to Intervene Out of Time for filing in the above-captioned proceedings.

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

Respectfully submitted,

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY

Sean M. Gallagher, Esq. (Pa.I.D. 318872)
GALLAGHER LAW GROUP

**COUNSEL FOR CLEVELAND-CLIFFS
STEEL**

KJB/kew

cc: Hon. Jeffrey A. Watson @ jeffwatson@pa.gov
Hon. Emily I. DeVoe @ edvoe@pa.gov
Cert. of Service

CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of the foregoing Cleveland-Cliffs Steel Petition to Intervene Out of Time upon the parties listed below in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party) via electronic mail this 13th day of January, 2026.

/s/ Kurt J. Boehm

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
vs.	:	Docket Nos. R-2025-3057983
	:	R-2025-3058051
Pennsylvania American Water Company	:	

**PETITION TO INTERVENE OUT OF TIME OF
CLEVELAND-CLIFFS STEEL**

AND NOW, comes Cleveland-Cliffs Steel (“Cleveland-Cliffs”), by its counsel and files the instant Petition to Intervene in response to the Petition of Pennsylvania American Water Company (“PAWC” or “Company”) pursuant to 52 Pa. Code §§ 5.71 – 5.74. In support of its Petition, Cleveland-Cliffs represents the following:

1. The Petitioner is:

Cleveland-Cliffs Steel

2. The name and address of Petitioner’s attorneys are:

Kurt J. Boehm, Esq.
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425 Walnut Street, Suite 2400
Cincinnati, Ohio 45202
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Sean M. Gallagher, Esq. (Pa. I.D. 318872)
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110 East Diamond Street, Suite 101
Butler, PA 16001
Email: smgallagher@gallagher.legal

3. Respondent utility is:

Pennsylvania American Water Company
800 West Hershey Park Drive, P.O. Box 888
Hershey, PA 17033-0888

4. Cleveland-Cliffs consents to the service of documents by electronic mail to kboehm@bkllawfirm.com, as provided in 52 Pa. Code § 1.54(b)(3).
5. Cleveland-Cliffs is one of the largest industrial customers on the Company's system. The rates paid by Cleveland-Cliffs for water service will be significantly affected if the Commission approves the rate increase requested herein. Therefore, Cleveland-Cliffs has a direct and substantial interest in the Commission's determination in this matter. Cleveland-Cliffs' interest cannot adequately be represented by any other party to this proceeding.
6. Cleveland-Cliffs alleges that the information filed in support of the Company's proposed rate increase is insufficient to establish that the rates to be collected are just and reasonable. Cleveland-Cliffs also alleges that the rate structure proposed by the Company may result in unwarranted subsidies.
7. 52 Pa. Code §§ 5.71 allows late interventions to be accepted when good cause is shown. Cleveland-Cliffs' Petition is being filed after the intervention deadline for the simple reason that Cleveland-Cliffs was not aware of the rate case filing until the morning of January 13, 2026. While Cleveland-Cliffs generally monitors activity at the Commission, there was a lapse in monitoring over the busy December and early January time frame. Cleveland-Cliffs believes that there is good cause to allow its Petition out-of-time as it will accept the record and the schedule of the case as it currently stands and does not believe that any party will be prejudiced by its late intervention in this matter.
8. At this time, Cleveland Cliffs has not identified a witness for this proceeding but will advise the Administrative Law Judges and parties upon the identification of any witness.

WHEREFORE, for the reasons stated above, Cleveland-Cliffs respectfully requests that its Petition to Intervene be granted and that it be afforded full party status in this proceeding.

Respectfully submitted,

/s/ Kurt J. Boehm

Kurt J. Boehm, Esq.

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**COUNSEL FOR CLEVELAND-CLIFFS
STEEL**

VERIFICATION

I, Kurt J. Boehm, attorney for Cleveland-Cliffs Steel, hereby verify that I am authorized to execute this Verification and that the facts set forth in the foregoing Petition to Intervene Out of Time are true and correct to the best of my knowledge, information and belief.

/s/ Kurt J. Boehm
Kurt J. Boehm, Esq.
BOEHM, KURTZ & LOWRY

**COUNSEL FOR CLEVELAND-CLIFFS
STEEL**

Dated: January 13, 2026