



SHERRARD, GERMAN & KELLY, P.C.  
— ATTORNEYS AT LAW —

Samuel J. Pasquarelli  
e-mail: [sjp@sgkpc.com](mailto:sjp@sgkpc.com)

January 7, 2026

DATE OF DEPOSIT

JAN -7 2026

VIA FEDERAL EXPRESS OVERNIGHT MAIL

PA Public Utility Commission  
Secretary's Bureau

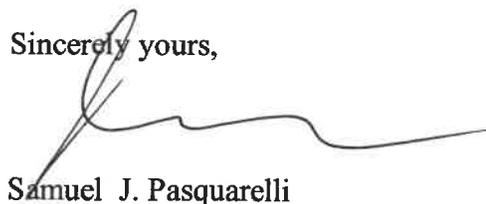
Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

In re: Joint Application of American Water Works, et al  
~~A-2025-3059927~~     A-2025-3058927  
~~A-2025-3059928~~     A-2025-3058928  
~~A-2025-3059929~~     A-2025-3058929

Ladies and Gentlemen:

Enclosed please find the original and two copies of the Petition to Intervene Out of Time filed by me on behalf of Utility Workers Union of America, AFL-CIO, Local 612. All other parties have been served electronically and by mail.

Sincerely yours,



Samuel J. Pasquarelli

SJP/pms  
Enc.  
cc: All captioned parties

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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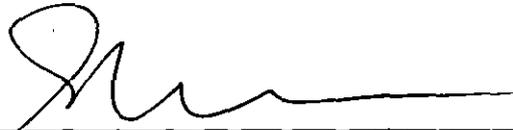
DATE OF DEPC

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Secretary's Bureau

**NOTICE TO PLEAD**

YOU ARE HEREBY ADVISED THAT, PURSUANT TO 52 PA. CODE § 5.66, YOU MAY ANSWER THE ENCLOSED PETITION TO INTERVENE OUT OF TIME 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 UTILITY WORKERS UNION OF AMERICA, AFL-CIO, LOCAL 612.



Samuel J. Pasquarelli (No. 00906)  
Sherrard, German & Kelly, P.C.  
535 Smithfield Street  
Suite 300  
Pittsburgh, PA 15222  
(412) 355-0200  
samuel.pasquarelli@sgkpc.com

Dated: January 7, 2026

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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**DATE OF DEPOSIT**

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PA Public Utility Commission  
Secretary's Bureau

**PETITION TO INTERVENE OUT OF TIME**

Pursuant to 52 Pa. Code §§ 5.71, 5.72 and 5.74, the Utility Workers Union of America, AFL-CIO, Local 612 (the "Union"), by and through its attorneys, Samuel J. Pasquarelli, Esq. and Sherrard, German & Kelly, PC, hereby files with the Pennsylvania Public Utility Commission (the "Commission") this Petition to Intervene Out of Time in the above-captioned 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. The Application directly affects the interests of the Union, which are not adequately represented by any existing party. For the reasons that follow, the Union respectfully requests that the Commission grant its Petition to Intervene, and in support thereof avers as follows:

1. Petitioner, Union, is a duly organized and validly existing unincorporated association, namely a labor organization recognized by the United States Department of Labor and by the Internal Revenue Service as a non-profit organization, with its office located at P. O.

Box 110, Dunlevy, PA 15432.

2. The Union is interested in the above-captioned docket as the certified collective bargaining representative of the over 900 production, maintenance and clerical employees of Peoples natural Gas Company, LLC ("Peoples").

3. The Union seeks to intervene to represent and protect the interests of its members as employees of Peoples. Specifically, the Union seeks to ensure that these employees retain the same benefits and protections provided for in that transaction. It also seeks to ensure that the succeeding organization adheres to all requirements involving the operation of its business and the use of its employees to the benefit of the customers of the succeeding organization.

4. 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.

5. The Union seeks intervention in the proceeding for due cause shown for the following reasons:

(a) The Union is the exclusive certified collective bargaining representative of over 900 production, maintenance and clerical employees of Peoples, which employees are required in many respects to conduct themselves in accordance with regulations of the Commission;

(b) The Union seeks to ensure that the succeeding organization adheres to the regulations of the Commission as those regulations impact the employees represented by the Union;

(c) The Union seeks to further ensure that the succeeding organization acts in accordance with Commission regulations relative to the said employees and that the succeeding organization honors its contractual and legal commitments to the said employees; and

(d) The Union seeks to protect the interests of all individuals who could be affected by the proposed transaction set forth in the Joint Application, including any potential rate impact since the Union has extensive knowledge regarding the manner in which Peoples conducts its business, which knowledge will be of significant assistance in providing for efficient delivery of natural gas service to the customers of the succeeding organization.

6. The Union 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.

7. As the representative of the employees who will be directly involved in providing utility services to the residents and entities who will receive those services, the Union submits that its intervention is in the public interest.

8. The Union intends to play an active role in the PUC's decision-making process and its participation herein will not unduly prejudice any party.

9. The Union, having just learned of the proposed merger between Peoples and the other applicants to these proceedings, submitted an information request to Peoples requesting information regarding the filing of proceedings with the Commission. This request was submitted on October 30, 2025.

10. Peoples responded to that request on November 11, 2025, stating that no proceedings had then been submitted to the Commission.

11. The Union anticipated that Peoples would notify the Union when any proceedings were filed with the Commission, but no such notice was received.

12. The Union believes and therefore avers that this application was filed on or about December 1, 2025.

13. The Union only learned on January 7, 2026 that the Commission had published a notice stating that Petitions for Intervention were to be filed by December 29, 2025.

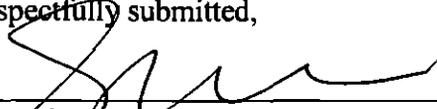
14. Had the Union learned before December 29, 2025 that this application had been filed, it would have filed its Petition to Intervene before that date.

15. While this Petition is being filed beyond December 29, 2025, the Union avers that a late filing of this Petition to Intervene will not prejudice any party.

16. The Union avers that allowing the filing of this Petition beyond December 29, 2025 is in the public interest because it will result in additional and important information being made available to all parties and to the Commission in resolving this application.

WHEREFORE the Utility Workers of America, AFL-CIO, Local 612 respectfully requests that the Commission grant the instant Petition to Intervene in this proceeding.

Respectfully submitted,



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Samuel J. Pasquarelli, Esq., (PA ID No. 00906)  
Sherrard, German & Kelly, P.C.  
535 Smithfield Street, Suite 300  
Pittsburgh, PA 15222  
Tel.: (412) 355-0200  
Fax: (412) 261-6221  
samuel.pasquarelli@sgkpc.com

Dated: January 7, 2026

DATE OF DEPOSIT

JAN -7 2026

PA Public Utility Commission  
Secretary's Bureau

**VERIFICATION**

I, Nick Shook, president of Utility Workers Union of America, AFL-CIO, Local 612, hereby verify that the statements of fact made in the foregoing petition 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. A., Sec. 4904, relating to unsworn falsification to authorities.

Dated: January 7, 2026

  
\_\_\_\_\_  
Nick Shook

DATE OF DEPOSIT

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**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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A-2025-3058928  
A-2025-3058929

**ORDER**

AND NOW, this \_\_\_\_\_ day of January, 2026, the request of the Utility Workers Union of America, AFL-CIO, Local 612 to file a Petition to Intervene Out of Time is hereby granted.

\_\_\_\_\_  
Charles E. Rainey, Jr.  
Chief Administrative Law Judge

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

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A-2025-3058928  
A-2025-3058929

**CERTIFICATE OF SERVICE**

I, Samuel J. Pasquarelli, Esq., hereby certify that I have served a true and correct copy of the foregoing Petition to Intervene upon the parties list below in accordance with the requirements of 52 Pa. Code §§ 1.54 (relating to service by a party) via Federal Express Overnight mail to the Secretary of the Public Utility Commission, 400 North Street, Harrisburg, PA 17120 and by electronic mail to the individuals listed below.

The Honorable Charles E. Rainey, Jr.  
Chief Administrative Law Judge  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
crainey@pa.gov

Allison Kaster, Esquire  
Director  
Bureau of Investigation & Enforcement  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
akaster@pa.gov

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Bryn Mawr, PA 19010  
Kajoyce@essential.co

Harrison W. Breitman, Esquire  
Joel Cheskis, Esquire  
Johnathan M. Longhurst, Esquire  
Crystal Zook, Esquire  
PA Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101  
PAWCAquaExternal@paoca.org

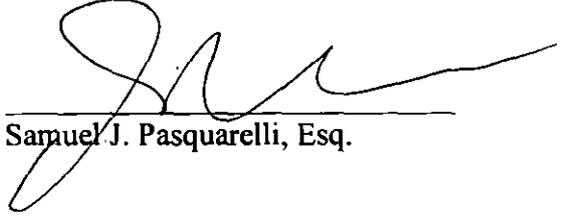
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Mark A. Lazaroff, Esquire  
Catherine G. Vasudevan, Esquire  
Brooke E. McGlinn, Esquire  
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Thomas.Wyatt@obermayer.com

Dated: January 7, 2026

  
\_\_\_\_\_  
Samuel J. Pasquarelli, Esq.

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Secretary's Bureau

ORIGIN ID: BTPA (412) 355-0200  
SAMUEL J. PASQUARELLI, ESQUIRE  
SHERRARD GERMAN & KELLY PC  
535 SMITHFIELD ST  
STE 300  
PITTSBURGH, PA 15222  
UNITED STATES US

SHIP DATE: 07JAN26  
ACTWGT: 0.50 LB  
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TO **OFFICE OF THE SECRETARY**  
**PA PUBLIC UTILITY COMMISSION**  
**400 NORTH STREET**

**HARRISBURG PA 17120**

(717) 772-7777

REF: 2718.0441

INV:

PO:

DEPT:

58HJ03A83/59F2



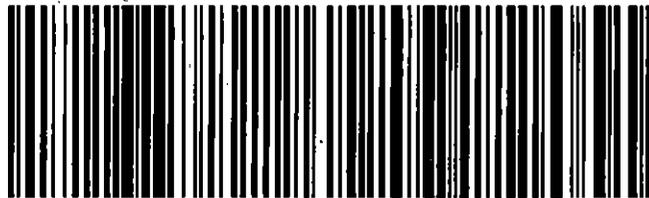
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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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