

# Morgan Lewis

**Mark A. Lazaroff**

Partner  
+1.215.963.4603  
mark.lazaroff@morganlewis.com

March 16, 2026

**VIA eFILING**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
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 for filing in the above-referenced matters is the **Answer of Pennsylvania-American Water Company to the Petition to Intervene Out of Time of Exeter Township School District and the Motion For Leave to Participate in the March 23-25, 2026 Evidentiary Hearing Via Telephone (“Answer”)**.

The Answer has been served upon Administrative Law Judges Emily I. DeVoe and Jeffrey A. Watson, and all parties of record as indicated in the attached Certificate of Service.

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

Very truly yours,



Mark A. Lazaroff

MAL/ap  
Enclosures

c: Per Certificate of Service (w/encls.)

DB1/ 167446876.1

**Morgan, Lewis & Bockius LLP**

2222 Market Street  
Philadelphia, PA 19103-3007  
United States

**T** +1.215.963.5000  
**F** +1.215.963.5001

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION</b>	:	
	:	
	:	<b>DOCKET NOS. R-2025-3057983</b>
<b>v.</b>	:	<b>R-2025-3058051</b>
	:	
<b>PENNSYLVANIA-AMERICAN WATER COMPANY</b>	:	
	:	

**ANSWER OF PENNSYLVANIA-AMERICAN WATER COMPANY TO THE PETITION  
TO INTERVENE OUT OF TIME OF EXETER TOWNSHIP SCHOOL DISTRICT AND  
THE MOTION FOR LEAVE TO PARTICIPATE IN THE MARCH 23-25, 2026  
EVIDENTIARY HEARING VIA TELEPHONE**

Pursuant to 52 Pa. Code §§ 5.66 and 5.103, Pennsylvania-American Water Company (“PAWC” or the “Company”) hereby files this Answer opposing the Petition to Intervene Out of Time (the “Petition”) of Exeter Township School District (the “District”) and the District’s Motion for Leave to Participate in the March 23-25, 2026 Evidentiary Hearing Via Telephone (the “Motion”).

As explained below, the District has not shown that good cause exists, as required pursuant to 52 Pa. Code § 5.74, to permit the District to intervene on the eve of evidentiary hearings in this proceeding. The District is a governmental authority represented by counsel that, despite being aware of this proceeding and filing a complaint almost 60 days ago, took no action to intervene or otherwise change its status to an active party until approximately 10 days before the commencement of the scheduled evidentiary hearing. The Commission should therefore deny the Petition in its entirety. If the District is permitted to intervene, it should be required to do so in-person, in Harrisburg, as is required of every other active participant in this proceeding, and the Motion should be denied.

## I. BACKGROUND

On November 14, 2025, Pennsylvania-American Water Company (“PAWC” or “Company”) initiated this proceeding by filing Supplement No. 58 to Tariff Water – Pa. P.U.C. No. 5 and Supplement No. 61 to Tariff Wastewater – Pa. P.U.C. No. 16, along with extensive supporting information, including the written direct testimony of 14 witnesses and their accompanying exhibits. On December 4, 2025, the Pennsylvania Public Utility Commission (“Commission”) instituted an investigation of PAWC’s existing and proposed rates and the Company’s proposed tariffs were suspended by operation of law until August 13, 2026.<sup>1</sup> This matter was subsequently assigned to Administrative Law Judges Jeffrey A. Watson and Emily I. Devoe (the “ALJs”) for purposes of conducting hearings and issuing a recommended decision.

On December 5, 2025, the ALJs issued a Prehearing Conference Order (“Prehearing Conference Order”).<sup>2</sup> The Prehearing Conference Order scheduled a telephonic prehearing conference for December 12, 2025, and included instructions on how to elect to participate in the proceeding as an active party.<sup>3</sup> The Prehearing Conference Order stated that any party that failed to attend and participate in the prehearing conference would be considered an inactive party, but a party could request a change in status to become an active party by filing a written request for a change in status.<sup>4</sup> Furthermore, the Prehearing Conference Order stated that active parties wishing

---

<sup>1</sup> *P.U.C. v. Pennsylvania-American Water Company*, Docket Nos. R-2025-3057983 and R-2025-3058051 (Orders entered Dec. 4, 2025).

<sup>2</sup> *P.U.C. v. Pennsylvania-American Water Company*, Prehearing Conference Order, Docket Nos. R-2025-3057983 and R-2025-3058051 (Dec. 5, 2025).

<sup>3</sup> *Id.* at 8-10.

<sup>4</sup> *Id.* at 10.

to present evidence at the evidentiary hearing would be required to submit testimony in writing in advance, in accordance with the schedule to be set after the prehearing conference.<sup>5</sup>

A prehearing conference in this proceeding was held on December 12, 2025. During the prehearing conference, the ALJs explained how customers filing complaints could participate as active parties and again stated that any party intending to present evidence at the formal evidentiary hearing would be required to submit testimony and exhibits in advance in accordance with the adopted litigation schedule and participate in accordance with the Commission's rules of practice and evidence.<sup>6</sup>

The ALJs issued a Prehearing Order on December 17, 2025 (the "Prehearing Order").<sup>7</sup> The Prehearing Order included a litigation schedule, which included deadlines for opposing party direct testimony on January 30, 2026, rebuttal testimony on February 27, 2026, surrebuttal testimony on March 13, 2026, written rejoinder or outlines of oral rejoinder on March 19, 2026, and in-person evidentiary hearings in Harrisburg on March 23-25, 2025.<sup>8</sup> The Prehearing Order also stated that any customer complainant wishing to participate as an active party must file correspondence with the Commission's Secretary Bureau indicating their intent to do so.<sup>9</sup>

The District filed a complaint in Docket No. R-2025-7983 (Water) in January 2026. The Commission Secretary provided notice to the Company of the District's complaint by letter dated January 15, 2026. The Company, in lieu of filing an answer to the District's complaint, relied

---

<sup>5</sup> *Id.* at 8.

<sup>6</sup> Tr. at 32-36.

<sup>7</sup> *P.U.C. v. Pennsylvania-American Water Company*, Prehearing Order, Docket Nos. R-2025-3057983 and R-2025-3058051 (Dec. 17, 2025).

<sup>8</sup> *Id.* at 7.

<sup>9</sup> *Id.* at 9.

upon 52 Pa. Code § 5.61(d), which provides that answers to complaints in rate proceedings are not required except as directed by the Commission or the presiding officer.<sup>10</sup>

In the Complaint, the District averred that the Company’s proposed rate increase would have an adverse impact on the District and residents, that the cumulative effect of increases is resulting on financial hardship on the District and residents, and that another rate increase would exacerbate challenges faced by the District and other school districts in the Company’s service territory.<sup>11</sup> The District’s requested relief was limited to requesting that the PUC conduct in-person public input hearings “in the affected communities, with a specific emphasis on Exeter Township.”<sup>12</sup>

Ten in-person public input hearings were held on January 13, 15, 16, 20, and 29, 2026, and two telephonic public input hearings were held on January 21, 2026. In total, approximately 240 witnesses testified at the public input hearings in this case. Two of those hearings were held in Berks County in close proximity to Exeter and included many Exeter residents and public officials, including the Chairman of the Board of the Exeter Township Supervisors, State Senator Judy Schwank, and State Representatives Gillen and Rusnock.<sup>13</sup>

On March 5, 2026, the ALJs issued an Interim Order Confirming Requirements for Evidentiary Hearing (“Interim Order”), which included the following requirements:

1. That only active parties shall be afforded an opportunity to present evidence at an evidentiary hearing.
2. That, in order to be considered an active party, an individual or entity must (1) file a complaint pursuant to 52 Pa. Code §

---

<sup>10</sup> 52 Pa. Code § 5.61(d).

<sup>11</sup> Formal Complaint to Proposed Rate Increase, Exeter Township School District, ¶ 5.

<sup>12</sup> *Id.*, ¶ 6.

<sup>13</sup> *See, e.g.*, Tr., pp. 736-45, 752-56, 770-75, 806-14, 823-31, 840-44, 848-53, 854-57, 897-905, 907-09, 915-19, 920-23, 925-28, 929-31, 943-49, 954-59, 959-65, 966-70, 979-84, 985-87. 1030-35, 1269-73.

5.21 et. seq. or a petition to intervene pursuant to 52 Pa. Code § 5.71 et seq., and (2) if filing a complaint under 52 Pa. Code § 5.21, 52 Pa. Code § 5.22, or 52 Pa. Code § 5.32, file also correspondence with the Commission's Secretary's Bureau indicating an intent to participate as an active party, as directed in the Prehearing Order entered December 17, 2025, and (3) comply with the provisions set forth in the Prehearing Order entered December 17, 2025, as amended.

3. The active parties as well as any individual or entity desiring to participate in these proceedings shall comply with the terms of all Orders issued in this proceeding, including the Prehearing Order entered on December 17, 2025, and amended by Interim Orders entered on January 28, 2026, and March 2, 2026.

\*\*\*

12. That no other oral or written testimony, exhibits, or evidence of any kind will be admitted into evidence at the evidentiary hearings unless the active party sponsoring such evidence has fully and timely complied with the terms and provisions set forth in this Interim Order and has provided all other active parties and the presiding officers with a written summary of any oral direct testimony and a copy of any written testimony, exhibits, or evidence of any kind, not later than **Friday March 13, 2026 at 4:00 p.m.**

The District filed the Petition and Motion on March 13, 2026, ten days prior to the commencement of the scheduled evidentiary hearing in this proceeding.<sup>14</sup> In the Petition, the District averred that it will present evidence (attached as Exhibits B and C to the Petition)<sup>15</sup> and testimony concerning the impact of the Company's proposed rate increases on public school districts and other public institutions.<sup>16</sup> The District stated that it was filing the Petition after the intervention deadline "as a result of the procedural clarifications recently issued and the necessity

---

<sup>14</sup> The District's pleadings are dated March 12, 2026, but were filed and served after 4:30 p.m. and are therefore deemed filed as of March 13, 2026. See 52 Pa. Code § 1.11.

<sup>15</sup> Exhibit B consists of an estimate of the Company's proposed rates on Water Rate Zone 1 customers and the Company's proposed Rate Zone 1 Schedule of Rates. Exhibit C appears to consist of internal District billing information related to invoices issued by the Company.

<sup>16</sup> Petition, ¶ 11.

to ensure that evidence of the impact to public schools is admitted and considered by the tribunal,” and that there is good cause to allow its Petition out-of-time and that it does not believe any party will be prejudiced by the late intervention.<sup>17</sup>

In the Motion, the District averred that the requirement that it be represented by legal counsel is an additional financial burden, and that permitting telephonic participation by both its counsel and witness will allow the District to monitor the proceedings and participate while minimizing travel time and expense.<sup>18</sup>

The District did not comply with the ALJs’ clear instructions in the Interim Order to provide all other active parties and the presiding officers with a written summary of any oral direct testimony and a copy of any written testimony, exhibits, or evidence of any kind, not later than Friday March 13, 2026 at 4:00 p.m.”<sup>19</sup>

## II. ARGUMENT

### A. The District Does Not Meet the Requisite Standards for Intervention

To demonstrate eligibility to intervene, a petitioner must show that it has an interest in the proceeding 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, or that petitioner has an interest of such a nature that participation may be in the public interest.<sup>20</sup>

---

<sup>17</sup> *Id.*, ¶ 12.

<sup>18</sup> Motion, ¶¶5-6.

<sup>19</sup> Interim Order, ¶ 12.

<sup>20</sup> 52 Pa. Code § 5.72(a)(2)(3).

Allowance of intervention is a matter within the discretion of the Commission.<sup>21</sup> “The interest of a petitioner seeking intervention must be direct and immediate.”<sup>22</sup>

The District’s stated interest in this proceeding is, as a customer, to oppose the rate increase sought by the Company.<sup>23</sup> However, there are already multiple active parties in this proceeding – including the Office of Consumer Advocate, the Office of Small Business Advocate, and the Coalition of Affordable Utility Services and Energy Efficiency in Pennsylvania – that oppose the rate increase sought by the Company and represent the interests of customers, and which have actively participated in this proceeding since it was initiated, including by submitting direct, rebuttal, and surrebuttal testimony in compliance with the Prehearing Order.<sup>24</sup> The District has not demonstrated why its interests are not adequately represented by these active parties, or why the public interest would be served by allowing it to intervene and participate in the evidentiary hearing at this late stage.

**B. The District Has Not Shown Good Cause As to Why The Petition Should Be Granted**

A petition to intervene out-of-time should not be granted absent good cause shown.<sup>25</sup> The District avers that good cause exists as a result of unspecified “procedural clarifications recently issued and the necessity to ensure that evidence of the impact to public schools is admitted and considered by the tribunal.” The District further avers that good cause exists because it does not

---

<sup>21</sup> *City Of Pittsburgh v. Pa. Pub. Util. Comm’n*, 153 Pa.Super. 83, 33 A.2d 641 (1943), *N.A.A.C.P., Inc. v. Pa. Pub. Util. Comm’n*, 290 A.2d 704 (Pa.Cmwlth. 1972).

<sup>22</sup> *Re Pennsylvania Power & Light Company*, 50 Pa. PUC 38, 40 (1976).

<sup>23</sup> Formal Complaint to Proposed Rate Increase, Exeter Township School District, ¶ 5.

<sup>24</sup> *Id.*, ¶ 6.

<sup>25</sup> 52 Pa. Code § 5.74(b).

believe that any party will be prejudiced by its late intervention.<sup>26</sup> The Commission should reject both arguments.

The District has no reasonable excuse for intervening at this late stage.<sup>27</sup> The District is not a *pro se* complainant. The District is a governmental authority, represented by counsel. Having filed a complaint nearly 60 days ago, the District was well aware of this proceeding and could have, at any time over the past roughly four months, filed a motion to intervene or elected active participant status. Even presuming that the unspecified “procedural clarifications” refers to provisions in the Interim Order relating to participation in the evidentiary hearing, the ALJs previously provided instructions for electing active participant status and participating in the evidentiary hearing in the Prehearing Conference Order, in the Prehearing Order and during each of the twelve public input hearings in this proceeding. The District does not explain how or why it was unaware of those requirements or why the District waited until just days prior to the evidentiary hearing to file the Petition.

Contrary to the District’s assertions, the Company and other parties would clearly be prejudiced by the District’s intervention at this late stage. The District failed to comply with any of the requirements for the submission of written testimony in this proceeding as set forth in the Prehearing Order, which is a bar to active participant status pursuant to Ordering Paragraph 2 of the Interim Order. The District also failed to provide a summary of the direct testimony it intends to offer at the evidentiary hearing in violation of Ordering Paragraph 12 of the Interim Order. As

---

<sup>26</sup> Petition, ¶ 12.

<sup>27</sup> See *Joint Application of Ppl Interstate Energy Co. & Ppl Elec. Utilities Corp. for All of the Necessary Auth., Approvals, & Certificates of Pub. Convenience (1) for the Transfer of Ppl Corps. Ownership Interest in Ppl Interstate Energy Co. to Talen Energy Corp., & Certain Post Closing Transactions Associated Therewith; (2) for the Transfer of Certain Prop. Interests Between Ppl Elec. Utilities Corp.*, A-2014-2435752, 2014 WL 5810354, at \*4 (Oct. 17, 2014) (rejecting “administrative oversight” as a reasonable excuse for missing the protest due date).

a result, the Company and other parties have not had the opportunity to propound discovery upon the District or otherwise explore or respond to any of the issues that could be raised by the District at the evidentiary hearing.

For all of the foregoing reasons, the Petition should be denied.

**C. If the Petition Is Granted, the District Has Not Shown Good Cause As to Why It Cannot Participate in The Hearings In-Person**

If the Petition is granted, the District should be required to participate in the evidentiary hearing in-person and the Motion should be denied. A litigation schedule has been in place in this proceeding since December 17, 2025. All other active parties, including other governmental authorities and individuals and parties with competing interests, are required to appear in-person in Harrisburg, PA.

The Interim Order is clear that active participants must comply with the Prehearing Order, which includes participation in the in-person evidentiary hearing. The cost and inconvenience to the District of appearing in-person does not constitute “good cause” as to why it should excused from adhering to the same requirements as each other active party. If the District is permitted to intervene, it should be placed on a level playing field with the other active participants and, therefore, the Motion should be denied. Furthermore, the District should be required to comply with the approved procedural schedule and should not be permitted to provide direct testimony at the evidentiary hearing for the reasons set forth in Section II.B.

**III. ANSWERS TO THE AVERMENTS IN THE NUMBERED PARAGRAPHS OF THE DISTRICT’S PETITION**

1. The Company lacks information to confirm or deny the averments contained in Paragraph 1 and proof is demanded thereof.

2. Admitted.

3. Denied as stated. The District is a customer of PAWC. It pays annual charges for water and wastewater service as required under the Company's Commission-approved rates.

4. Admitted.

5. Admitted.

6. Denied as stated. The District is affected by the Company's proposed rate increases to the same extent as any other customer of the Company.

7. The Company lacks information to confirm or deny the averments contained in Paragraph 7 and proof is demanded thereof.

8. Denied. The District has not demonstrated that it has a direct, substantial, and immediate interest in the outcome of this proceeding and proof is demanded thereof.

9. Paragraph 9 contains legal conclusions to which no response is required.

10. The Company lacks information to confirm or deny the averments contained in Paragraph 10 and proof is demanded thereof.

11. The Company lacks information to confirm or deny the averments contained in Paragraph 11 and proof is demanded thereof.

12. The statement in paragraph 12 regarding 52 Pa. Code § 5.71 is a legal conclusion to which no response is required. The Company lacks information to confirm or deny the remaining averments contained in Paragraph 12 and proof is demanded thereof.

13. Admitted.

**IV. ANSWERS TO THE AVERMENTS IN THE NUMBERED PARAGRAPHS OF THE DISTRICT'S MOTION**

1. Admitted.

2. Admitted.

3. The Company lacks information to confirm or deny the averments contained in Paragraph 3 and proof is demanded thereof.

4. Paragraph 4 contains a request for relief to which no response is required.

5. It is admitted that municipal or government entities are required to be represented by legal counsel. The Company lacks information to confirm or deny the remaining averments contained in Paragraph 5 and proof is demanded thereof.

6. The Company lacks information to confirm or deny the averments contained in Paragraph 6 and proof is demanded thereof.

7. Denied for the reasons set forth in Section II.B. of this Answer.

8. The Company lacks information to confirm or deny the averments contained in Paragraph 8 and proof is demanded thereof.

9. The Company lacks information to confirm or deny the averments contained in Paragraph 9 and proof is demanded thereof.

10. Paragraph 10 contains legal conclusions to which no response is required.

11. Denied for the reasons set forth in Section II.B. of this Answer.

WHEREFORE, for the foregoing reasons, the District's Petition and Motion should be denied.



---

Teresa K. Harrold (Pa. No. 311082)  
Elizabeth Rose Triscari (Pa. No. 306921)  
Erin K. Fure (Pa. No. 312245)  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
717.550.1570 (bus)  
[teresa.harrold@amwater.com](mailto:teresa.harrold@amwater.com)  
[elizabeth.triscari@amwater.com](mailto:elizabeth.triscari@amwater.com)  
[erin.fure@amwater.com](mailto:erin.fure@amwater.com)

Kenneth M. Kulak (PA No. 75509)  
Mark A. Lazaroff (PA No. 315407)  
Catherine G. Vasudevan (PA No. 210254)  
Brooke E. McGlinn (PA No. 204918)  
Morgan, Lewis & Bockius LLP  
2222 Market Street  
Philadelphia, PA 19103-3007  
215.963.5384 (bus)  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)

*Counsel for Pennsylvania-American Water  
Company*

## VERIFICATION

I, Dr. Christina Chard, hereby declare that I am Senior Director of Rates and Regulatory of Pennsylvania-American Water Company; that I am authorized to make this verification on behalf of Pennsylvania-American Water Company; that the facts set forth in the foregoing Answer are true and correct to the best of my knowledge, information and belief; and that I make this verification subject to the penalties of 18 Pa.C.S. § 4904 pertaining to false statements to authorities.

Date: March 16, 2026

A handwritten signature in blue ink that reads "Christina Chard". The signature is written in a cursive style and is positioned above a solid black horizontal line.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION</b>	:	
	:	<b>Docket No. R-2025-3057983</b>
	:	<b>(Water)</b>
<b>v.</b>	:	
	:	<b>Docket No. R-2025-3058051</b>
<b>PENNSYLVANIA-AMERICAN WATER COMPANY</b>	:	<b>(Wastewater)</b>

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served true and correct copies of the **Answer of Pennsylvania-American Water Company to the Petition to Intervene Out of Time of Exeter Township School District and the Motion For Leave to Participate in the March 23-25, 2026 Evidentiary Hearing Via Telephone** on the following individuals in the matter specified in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA ELECTRONIC MAIL**

The Honorable Jeffrey A. Watson  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
Piatt Place  
301 Fifth Avenue, Suite 220  
Pittsburgh, PA 15222  
[jeffwatson@pa.gov](mailto:jeffwatson@pa.gov)

The Honorable Emily I. DeVoe  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
Piatt Place  
301 Fifth Avenue, Suite 220  
Pittsburgh, PA 15222  
[edevoe@pa.gov](mailto:edevoe@pa.gov)

Harrison W. Breitman\*  
Ryan Morden\*  
Janna E. Williams\*  
Olivia M. Spergel\*  
Johnathan M. Longhurst\*  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
[OCAPAWC2025@paoca.org](mailto:OCAPAWC2025@paoca.org)

Carrie B. Wright\*  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[carwright@pa.gov](mailto:carwright@pa.gov)

Rebecca Lyttle\*  
Steven C. Gray\*  
Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor, Forum Place  
Harrisburg, PA 17101  
[relyttle@pa.gov](mailto:relyttle@pa.gov)  
[sgray@pa.gov](mailto:sgray@pa.gov)

Lauren M. Burge\*  
Eckert Seamans Cherin & Mellot, LLC  
600 Grant St., 44<sup>th</sup> Floor  
Pittsburgh, PA 15206  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)  
*Counsel for Victory Brewing Company*

Sean M. Gallagher  
Gallagher Law Group  
110 East Diamond Street, Suite 101  
Butler, PA 16001  
[smgallagher@gallagher.legal](mailto:smgallagher@gallagher.legal)  
*Counsel for Cleveland Cliffs Steel*

Sharon W. Montanye  
Sweet, Stevens, Katz & Williams LLP  
331 E. Butler Avenue  
New Britain, PA 18901  
[smontayne@sweetstevens.com](mailto:smontayne@sweetstevens.com)  
*Counsel for Exeter Township School District*

Lauren N. Berman\*  
Elizabeth R. Marx\*  
Ria M. Pereira\*  
John W. Sweet\*  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
*Counsel for CAUSE-PA*

Stephen M. Pemberton\*  
Eckert Seamans Cherin & Mellot, LLC  
Two Liberty Place, 22<sup>nd</sup> Floor  
60 South 16<sup>th</sup> Street  
Philadelphia, PA 19102  
[spemberton@eckertseamans.com](mailto:spemberton@eckertseamans.com)  
*Counsel for Victory Brewing Company*

Kurt J. Boehm\*  
Boehm, Kurtz & Lowry  
425 Walnut Street, Suite 2400  
Cincinnati, OH 45202  
[kboehm@BKLawfirm.com](mailto:kboehm@BKLawfirm.com)  
*Counsel for Cleveland Cliffs Steel*



---

Mark A. Lazaroff (Pa. No. 315407)  
Morgan, Lewis & Bockius LLP  
2222 Market Street  
Philadelphia, PA 19103-3007  
215.963.4603 (office)  
215.963.5001 (fax)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
*Counsel for Pennsylvania-American Water Company*

Dated: March 16, 2026

**\* Executed SPA and/or Protective Order  
Acknowledgement**