



WATSON MUNDORFF, LLP

WATSON MUNDORFF WITT GANNON & GORDON

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May 15, 2026

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**RE: Docket No. A-2025-3055741 – Application of Pennsylvania-American
Water Company to Acquire the Water System Assets of the Indian Creek Valley
Water Authority**

Dear Secretary Chiavetta:

We are counsel to the Indian Creek Valley Water Authority (“ICVWA”) in the above-captioned matter, and are submitting, with this letter, ICVWA’s Petition to Intervene in the above-referenced proceeding.

This document is being served via electronic mail on all parties of record per the attached Certificate of Service.

Very truly yours,

Timothy J. Witt

CC: Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: Application of Pennsylvania-American Water :
Company under Sections 1102(a) and 1329 of the :
Pennsylvania Public Utility Code, 66 Pa C.S. :
§§ 1102(a) and 1329, for approval of (1) the transfer, : Docket No. A-2025-3055741
by sale, to Pennsylvania-American Water Company, :
of substantially all of the assets, properties and rights :
related to the water treatment and distribution system :
owned by the Indian Creek Valley Water Authority, :
and (2) the rights of Pennsylvania-American Water :
Company to begin to offer or furnish water service to :
the public in all of the Borough of Ohiopyle and :
portions of the Townships of Saltlick, Springfield,
Bullskin, Connellsville and Stewart, Fayette County
and all of the Borough of Donegal and portions of the
Townships of Donegal, and Mount Pleasant,
Westmoreland County, Pennsylvania and

PETITION TO INTERVENE

Pursuant to 52 Pa. Code §§ 5.71, 5.72 and 5.74, Indian Creek Valley Water Authority (“ICVWA” or the “Authority”), by and through its attorneys, Watson Mundorff, 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 (“PAWC”) for approval to acquire the water treatment and distribution system of ICVWA. The Application directly affects the interests of ICVWA, which are not adequately represented by any existing party. For the reasons that follow, ICVWA respectfully requests that the Commission grant its Petition to Intervene, and in support thereof avers as follows:

1. ICVWA is an authority incorporated by Saltlick Township and Springfield Township under the Municipality Authorities Act to serve both and other municipalities with water treatment and distribution system service.
2. While Saltlick Township and Springfield Township incorporated ICVWA to serve both municipalities, the Authority also provides water services to all of the Borough of Ohiopyle

and portions of Bullskin Township, Connellsville Township, Stewart Township in Fayette County as well as all of the Borough of Donegal and portions of Donegal Township and Mount Pleasant Township in Westmoreland County (the “Service Area”).

3. ICVWA’s business address is 2019 Indian Head Rd, Indian Head, Pennsylvania 15446.

4. ICVWA owns and operates a water treatment and distribution system that includes four (4) source water sites and four (4) water treatment facilities; approximately 123 miles of water main; 486 fire hydrant installations; eleven (11) water storage tanks; five (5) pump stations; and seven (7) pressure reducing stations (the “System”).

5. ICVWA is interested in the above-captioned docket as a party to the agreement under which PAWC seeks approval to acquire the System.

6. ICVWA supports the Application filed by PAWC at this docket.

7. 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.

8. ICVWA seeks intervention in the proceeding for due cause shown for the following reasons: (a) ICVWA is a party to the Asset Purchase Agreement (the “APA”) whereby

PAWC agreed to purchase ICVWA's water treatment and distribution system, which provides water service to approximately 2,389 customers in the Service Area; (b) PAWC's Application relies on the Authority's consent to the sale of the wastewater collection and treatment system.

9. ICVWA 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.

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

11. The Authority 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 Indian Creek Valley Water Authority respectfully requests that the Commission grant the instant Petition to Intervene in this proceeding.

Respectfully submitted,

/s/ Timothy J. Witt

Timothy J. Witt, Esquire (PA Bar ID: 308914)

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Counsel for Indian Creek Valley Water Authority

Dated: May 15, 2026

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PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Pennsylvania-American Water :
Company under Sections 1102(a) and 1329 of the :
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substantially all of the assets, properties and rights :
related to the water treatment and distribution system :
owned and operated by the Indian Creek Valley Water : Docket No. A-2025-3055741, *et al.*
Authority, and (2) the rights of Pennsylvania-American :
Water Company to begin to offer or furnish water service :
to the public in all of the Borough of Ohiopyle and :
portions of the Townships of Saltlick, Springfield, :
Bullskin, Connellsville and Stewart, Fayette County and :
all of the Borough of Donegal and portions of the :
Townships of Donegal and Mount Pleasant, :
Westmoreland County :

CERTIFICATE OF SERVICE

I hereby certify that I have served a true copy of Indian Creek Valley Water Authority's
Petition to Intervene upon the parties, listed below in accordance with the requirements of 52 Pa.
Code §1.54 (relating to service by a party).

VIA Electronic Delivery – May 15, 2026

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Dated: May 15, 2026

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