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PA PUC  
SECRETARY'S BUREAU  
FRONT DESK  
*Louise A. Knight*  
3610 Logan Court  
Unit 3B  
Camp Hill, PA 17007  
Telephone: 717-919-4087

August 16, 2019

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

**In Re: Indian Springs Water Company; Docket No. M-2019-3011972**

**NOTICE OF APPEARANCE OF LOUISE A. KNIGHT AND LETTER PETITION  
FOR AN EXPEDITED HEARING ON BEHALF OF THE INDIAN SPRINGS  
WATER COMPANY**

Dear Secretary Chiavetta;

Enclosed for filing with the Pennsylvania Public Utility Commission is the Notice of Appearance of Louise A. Knight on behalf of The Indian Springs Water Company in the above-captioned proceeding. Also enclosed is a letter petition requesting the scheduling of an expedited hearing.

A copy of this document has been served in accordance with the attached Certificate of Service. Should you have any questions or comments, please feel free to call me. Thank you for your attention to this matter.

Sincerely,



Louise A. Knight  
Counsel for *Indian Springs Water Company*

LAK

Enclosures

**Service per Certificate of Service**

**Tanya Dobash, Esq., Glen Summit**

**Shaun A. Sparks, Deputy Chief Counsel**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

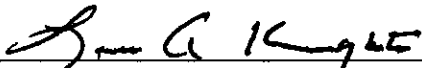
Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. M-2019-3011972
	:	
The Indian Springs Water Company	:	

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**NOTICE OF APPEARANCE**

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Please enter the appearance of the undersigned counsel in the above-captioned matter on behalf of Indian Springs Water Company. On the basis of this notice, I am requesting an electronic copy of each document issued by the Commission or served by a party in this matter.

  
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Louise A. Knight (PA ID No. 26167)  
3610 Logan Court  
Unite 3B  
Camp Hill, PA 17011  
Telephone: 717-919-4087  
E-mail: attylknight@gmail.com  
Counsel for *The Indian Springs Water Company*

Dated: August 16, 2019

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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SECRETARY'S BUREAU

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Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North St., 2<sup>nd</sup> Floor North  
Harrisburg, PA 17120

August 16, 2019

In Re: Indian Springs Water Company;  
Docket No.M-2019-3011972

Letter Petition for an Expedited Hearing

Dear Secretary Chiavetta,

I have recently been retained by Indian Springs Water Company ("Indian Springs" or "water Company") to represent it before the Pennsylvania Public Utility Commission ("Commission" or "PaPUC"). I am writing this letter petition to address the unexpected action the PaPUC took at its August 8, 2019 public meeting, in which it appointed a receiver, Pennsylvania American Water Company ("PAWC"), to take over the control and management of Indian Springs without any notice to Indian Springs.

The purpose of this letter petition is to request that the Commission assign this matter to an Administrative Law Judge ("ALJ") in the most expeditious manner and that a hearing be scheduled within ten (10) days, to wit, on August 26 or 27, due to limited availability of counsel.

From Indian Springs' perspective, the issuance of the order in question without any notice or opportunity to be heard, is tantamount to an emergency order, although the order does not explicitly state that it is an emergency order. The fact that Indian Springs had no notice of the Commission's order nor, therefore, any opportunity to heard renders it a de facto emergency order.

52 Pa. Code §3.4 provides that a person against whom an emergency order is issued may file a petition for an expedited hearing to determine whether the emergency order will remain in effect. Petitioner submits that the PaPUC both should and must afford Indian Springs the opportunity to not only explain why receivership is not necessary, but also why the Commission should have given Indian Springs the chance to explain how it intends to wrap up its public utility service in a logical manner than serves the public interest as well as the interests of its few remaining customers.

Due to the fact that the Commission's August 8, 2019 was unexpected and, therefore, required its officers, counsel and other interested parties to marshal resources extremely quickly, and knowing that counsel for the receiver is unavailable the week of August 19-23, 2019, Indian Springs asks for the hearing to be held on August 26 or 27, when counsel will be available.

Thank you in advance for your assistance in this matter.

Respectfully submitted,



Louise A. Knight (PA ID No. 26167)

3610 Logan Court

Unit 3B

Camp Hill, PA 17011

Telephone: 717-919-4087

E-mail: [attylknight@gmail.com](mailto:attylknight@gmail.com)

Counsel for *The Indian Springs Water Co.*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In Re: The Indian Springs Water Company

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: Docket Nos. M-2019-3011972\_  
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**CERTIFICATE OF SERVICE**

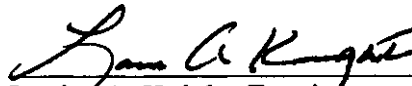
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I hereby certify that I have this day served a true copy of the foregoing **Notice of Appearance of Louise A. Knight on behalf of The Indian Springs Water Company**, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**VIA E-MAIL AND FIRST CLASS MAIL**

Christine M. Hoover, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
E-mail: choover@paoca.org

Elizabeth Rose Triscari, Esquire  
Pennsylvania American Water  
582 Wesley Drive  
Mechanicsburg, PA 17055



\_\_\_\_\_  
Louise A. Knight, Esquire  
Counsel for *The Indian Springs Water Company*

Date: August 16, 2019

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