

**Louise A. Knight
3610 Logan Court
Unit 3B
Camp Hill, PA 17011
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November 12, 2019

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

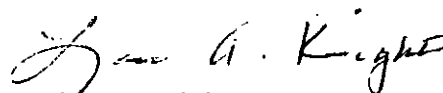
In Re: Indian Springs Water Company; Docket No. M-2019-3011972

Dear Secretary Chiavetta;

Enclosed for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum submitted by the Indian Springs Water Company and Glen Summit Company in the above-captioned proceeding.

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 and
Glen Summit Company*

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COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC
UTILITY COMMISSION

In re: The Indian Springs Water Company : Docket No. M-2019-3011972

PREHEARING MEMORANDUM OF THE
INDIAN SPRINGS WATER COMPANY
AND GLEN SUMMIT COMPANY

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE STEVEN K. HAAS:

The Indian Springs Water Company (Indian Springs) and the Glen Summit Company (Glen Summit) hereby submit their joint Prehearing Memorandum in the above-captioned matter pursuant to the Prehearing Order issued by Your Honor on October 30, 2019.

1. PROCEDURAL HISTORY

Indian Springs and Glen Summit hereby incorporate by reference the thorough procedural history set forth in the Prehearing Memorandum submitted by the Bureau of Investigation & Enforcement.

2. COUNSEL AND SERVICE OF DOCUMENTS

Counsel for Indian Springs and Glen Summit is:

Louise A. Knight
3610 Logan Court, Unit 3B
Camp Hill, PA 17011

717-919-4087

Email: AttyLKnight@gmail.com

Service of documents may be electronic exclusively.

3. ISSUES AND POSITION OF INDIAN SPRINGS AND GLEN SUMMIT

Section 529 provides primarily for a procedure for a non-viable or incapable water utility to be taken over by a capable public water supplier. But it also provides for the exploration of other viable alternatives. In this instant case, many customers of Indian Springs have already drilled wells and disconnected from the water system. Most of the remaining customers are in the process of drilling wells or plan to do so. Pennsylvania-American Water Company ("PAWC"), the receiver and the entity which had previously entered into a contingent agreement to purchase Indian Springs, are collecting data on an ongoing basis to ascertain the status and intention of all the customers and prior customers.

Realistically, the lack of customers and the cost of system improvements make the continuation of a public water supply company in the service area make abandonment of service the only feasible outcome, so long as all customers have the opportunity to have an alternative source of potable water, such as a well. The parties have discussed that alternative and have been in ongoing settlement discussion in an attempt to arrive at a viable alternative and to thereby resolve the issues in this matter.

4. WITNESSES

At this time, Indian Springs and Glen Summit would call as witnesses Ruth Hughes, current President of Indian Springs, and one or more of the customers or prior customers of Indian Springs. However, it is also likely that the facts in this case could be presented by way of stipulation, if the case proceeds to a hearing.

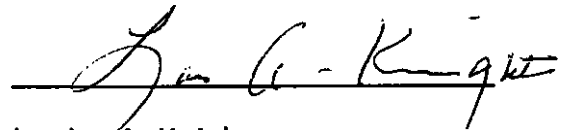
5. LITIGATION SCHEDULE

Indian Springs and Glen Summit concur with other parties that a litigation schedule not be adopted at this time as the parties are voluntarily and actively in discussions about possible settlement. If Your Honor favors a litigation schedule, Indian Springs and Glen Summit will cooperate in setting a schedule. However, Indian Springs and Glen Summit propose that, if the litigation schedule is held in abeyance, the parties could submit periodic status reports to Your Honor.

6. SETTLEMENT

Indian Springs and Glen Summit intend to participate in all ongoing settlement discussions, which, as previously mentioned, have been ongoing.

Respectfully submitted,



Louise A. Knight

Attorney No. 26167

3610 Logan Court, Unit 3B

Camp Hill, PA 17011

E-mail: AttyLKnight@gmail.com

November 12, 2019

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In Re: The Indian Springs Water Company

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

I hereby certify that I have this day served a true copy of the foregoing, 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 MAILOR HAND DELIVERY


Christine M. Hoover, Esquire
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Forum Place, 5th Floor
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Elizabeth Rose Triscari, Esquire
Pennsylvania American Water
582 Wesley Drive
Mechanicsburg, PA 17055

Scott B. Grainger, Esquire
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The Honorable Steven K. Haas
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Louise A. Knight, Esquire
Counsel for *The Indian Springs Water Company* and
Glen Summit Company

Date: November 12, 2019