

## CAPTION SHEET

CASE MANAGEMENT SYSTEM

1. REPORT DATE: 00/00/00 :  
 2. BUREAU: LAW :  
 3. SECTION(S): :  
 5. APPROVED BY: : 4. PUBLIC MEETING DATE:  
 DIRECTOR: : 00/00/00  
 SUPERVISOR: :  
 6. PERSON IN CHARGE: : 7. DATE FILED: 02/15/06  
 8. DOCKET NO: C-20065889 : 9. EFFECTIVE DATE: 00/00/00

PARTY/COMPLAINANT: LAW BUREAU PROSECUTORY (2000.0200)

RESPONDENT/APPLICANT: SUN VALLEY WATER COMPANY

COMP/APP COUNTY:

UTILITY CODE: 210119

## ALLEGATION OR SUBJECT

LAW BUREAU PROSECUTORY STAFF FILED COMPLAINT AGAINST ROBERT CAMERON, OWNER & DONALD CAMERON, OWNER & SUN VALLEY WATER COMPANY. THE RESPONDENTS HAVE BEEN RENDERING UNMETERED WATER SERVICE TO THE PUBLIC FOR COMPENSATION SINCE AT LEAST JUNE 15, 1985. THE RESPONDENTS DO NOT HAVE A CERTIFICATE OF PUBLIC CONVENIENCE ISSUED BY THIS COMMISSION AUTHORIZING THE PROVISION OF WATER SERVICE TO THE PUBLIC. THE LAW BUREAU STAFF REQUEST THAT THE COMMISSION FINE RESPONDENTS JOINTLY AND SEVERALLY IN THE AMOUNT OF \$1,000 PER VIOLATION LISTED IN PARAGRAPH NOS. 4, 5, 10, 14 & 15 FOR A TOTAL OF \$5,000, FOR RESPONDENTS REPEATED VIOLATIONS. THE LAW BUREAU FURTHER REQUEST THAT THE COMMISSION FINE THE RESPONDENTS JOINTLY AND SEVERALLY IN THE AMOUNT OF \$1,000 PER MONTH FOR EACH MONTH SINCE APRIL 2005 THAT RESPONDENTS HAVE NOT PERFECTED THEIR APPLICATION FOR A TOTAL OF \$10,000. THEREFORE THE COMMISSION IS FINING THE RESPONDENT FOR THE TOTAL SUM OF \$15,000 FOR THE NUMEROUS VIOLATIONS.

DOCUMENT  
FOLDERDOCKETED  
FEB 17 2006

**ORIGINAL**

BEFORE THE  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SECRETARY'S OFFICE

2006 FEB 15 PM 3:09

**PENNSYLVANIA PUBLIC  
UTILITY COMMISSION, LAW  
BUREAU PROSECUTORY STAFF  
(2000.0200)**

**Plaintiff**

v.

Docket No. C-2006 5089

**Robert Cameron, Owner  
and  
Donald Cameron, Owner  
and  
Sun Valley Water Company,**

**Respondents**

**DOCKETED**  
FEB 17 2006

COMPLAINT

**DOCUMENT  
FOLDER**

The Pennsylvania Public Utility Commission (Commission) is a duly constituted agency of the Commonwealth of Pennsylvania empowered to regulate public utilities within the Commonwealth. The Commission has delegated its authority to initiate proceedings which are prosecutory in nature to the Law Bureau and to other bureaus with enforcement responsibilities. Pursuant to that delegated authority and Section 701 of the Public Utility Code, 66 Pa. C.S. §701, the Law Bureau Prosecutory Staff hereby represents as follows:

1. Sun Valley Water Company (Sun Valley or Respondent) has a mailing address at P.O. Box 1090 Broadheadsville, PA 18322.

2. Robert Cameron (Respondent), an owner of Sun Valley Water Company, has a mailing address at P.O. Box 231, Perry, Maine, 04667.

3. Donald Cameron (Respondent), an owner of Sun Valley Water Company, has a mailing address at 20 N. 9<sup>th</sup> Street Apt. #1, Emmaus, PA 18049.

77

4. Respondents have been rendering unmetered water service to the public for compensation since at least June 15, 1985.

5. Respondents do not have a certificate of public convenience issued by this Commission authorizing the provision of water service to the public.

6. On June 26, 1985 and November 3, 1986 Commission Staff sent letters to the former owner of Sun Valley, Mrs. Claire Cameron, widow of William Cameron (prior former owner) and mother of Respondents, Robert Cameron and Donald Cameron, stating that Sun Valley was providing water service in violation of the Public Utility Code. On September 8, 1986, Commission Staff sent a similar letter to and Mr. Edward Hoffner, Esquire, then attorney-of-record for Respondents, regarding Respondents' repeated violations. In all of the letters, Respondents were advised that an application for a certificate of public convenience needed to be filed.

7. Sometime thereafter, Robert Cameron and Donald Cameron became owners of Sun Valley in place of their mother, Mrs. Claire Cameron.

8. In 2000, 2002, 2004 and 2005, Commission Staff again sent letters notifying Respondents of the necessity to file an application to provide water service pursuant to the Public Utility Code.

9. On April 30, 2005, Respondents attempted to file an application for a certificate of public convenience. However, Respondents failed to perfect the application since they did not provide Commission Staff with information necessary to process the application.

10. Since the filing of the application, the Commission's Bureau of Consumer Services has received numerous informal complaints from Respondents' customers concerning service outages and low water pressure problems.

11. Based upon the information available, it appears that Robert Cameron is no longer responding to Commission correspondence. It also appears that Donald Cameron is in ill health. In any event, it is apparent that neither owner is able or willing to provide water service in accordance with Commission regulations.

12. Respondents, by failing to apply for and receive a certificate of public convenience prior to providing water service to the public for compensation, are in violation of 66 Pa. C.S. §§ 1101, 1102 and 1103.

13. Respondents, by failing to perfect their application, are in violation of 66 Pa. C.S. §§ 1101, 1102 and 1103.

14. Respondents, by providing service at least since 1985 without having first received a certificate of public convenience, have prevented the Commission from collecting annual assessments in violation of 66 Pa. C.S. § 510.

15. Respondents, by providing service at least since 1985 without having first received a certificate of public convenience, have prevented the Commission from requiring the filing of annual reports in violation of 66 Pa. C.S. § 504 and 52 Pa. Code § 65.19.

16. Respondents, by rendering unmetered service, are in violation of the Commission's regulations at 52 Pa. Code § 65.7.

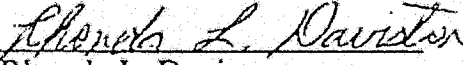
17. Respondents, as a result of subjecting customers to inadequate service pressure and system outages on numerous occasions, have failed to provide reasonable service to its customers in violation of the Public Utility Code at 66 Pa. C.S. § 1501, and the Commission's regulations at 52 Pa. Code §§ 65.6, 67.1.

WHEREFORE, Law Bureau Prosecutory Staff hereby requests that the Commission fine Respondents jointly and severally in the amount of \$1,000 per violation listed in Paragraph Nos. 4, 5, 10, 14 and 15, for a total of \$5,000, for Respondents repeated violations of the Public Utility Code and the rules and regulations of the Commission.

WHEREFORE, Law Bureau Prosecutory Staff further requests that the Commission fine the Respondents jointly and severally in the amount of \$1,000 per month for each month since April 2005 that Respondents have not perfected their application for a total of \$10,000.

WHEREFORE, Law Bureau Prosecutory Staff hereby requests that the Commission fine Respondents jointly and severally the total sum of \$15,000 for the numerous violations described in this Complaint and order such other remedy as the Commission may deem appropriate.

Respectfully submitted,

  
Rhonda L. Daviston  
Law Bureau Prosecutory Staff  
Attorney I.D. # 49640  
P.O. Box 3265  
Harrisburg, PA 17105-3265

VERIFICATION

I, William D. Shrader, FUVS, in the Bureau of Fixed Utility Services, hereby state that the facts above set forth in the foregoing Complaint 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 any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to the unsworn falsification to authorities).

Date:

2/15/2006



William D. Shrader, FUVS  
Bureau of Fixed Utilities

N-O-T-I-C-E

A. You must file an Answer within 30 days of the date of service of this Complaint. The date of service is the mailing date as indicated at the top of the Secretarial cover letter for this Complaint and Notice. See 52 Pa. Code § 1.56(a). The Answer must raise all factual and legal arguments that you wish to claim in your defense and must include the reference number of this Complaint. Your Answer must be verified and the original and three copies sent to:

James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

B. If you fail to answer this Complaint within 30 days, Law Bureau Prosecutory Staff will request that the Commission issue an Order imposing the penalty set forth in the Complaint.

C. If you file an Answer that admits or fails to deny the allegations of the Complaint, Law Bureau Prosecutory Staff will request the Commission to issue an Order imposing the penalty set forth in this Complaint.

D. If you file an Answer that contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint, and may impose additional and/or alternative penalties as appropriate.

E. If you are a corporation, you must be represented by legal counsel. See 52 Pa. Code §§ 1.21-1.22.

F. Alternative formats of this material are available for persons with disabilities by contacting the Public Utility Commission at (717) 787-5620.



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE  
2000.0200

Date of Service: 2/21/06

Robert Cameron  
Sun Valley Water Company  
P.O. Box 231  
Perry, Maine 04667

Donald Cameron  
Sun Valley Water Company  
20 N. 9<sup>th</sup> Street, Apt. #1  
Emmaus, PA 18049

DOCUMENT  
FOLDER

C-2006 5889

Law Bureau Prosecutory Staff (2000.0200)

v.

Robert Cameron and Donald Cameron, Owners  
Sun Valley Water Company

**DOCKETED**  
FEB 17 2006

Attention Robert Cameron and Donald Cameron:

The Pennsylvania Public Utility Commission has delegated its authority to initiate prosecutory proceedings to several bureaus in the Commission with enforcement responsibilities. Pursuant to this delegated authority and Section 701 of the Public Utility Code, 66 Pa. C.S. §701, Law Bureau Prosecutory Staff has filed the attached **Complaint against you seeking fines for your failure to: 1) perfect your application for a certificate of public convenience, 2) provide metered rates, 3) provide reasonable service, and 4) comply with the Commission's reporting requirements.**

Please refer to the "Notice" at the front of the Complaint for detailed instructions on how to proceed. Any questions may be directed to Commission Prosecutory Staff Counsel Rhonda L. Daviston at (717) 787-6166.

Very truly yours,

*James J. McNulty*  
James J. McNulty  
Secretary

cc: Rhonda L. Daviston, Assistant Counsel, Law Bureau  
William D. Shrader, FIVE, Bureau of Fixed Utility Services

**COPY**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

SECRET  
2006 FEB 15 PM 3:09

**PENNSYLVANIA PUBLIC  
UTILITY COMMISSION, LAW  
BUREAU PROSECUTORY STAFF  
(2000.0200)**

**Plaintiff**

**v.**

**Docket No. C-2006 5889**

**Robert Cameron, Owner  
and  
Donald Cameron, Owner  
and  
Sun Valley Water Company,**

**Respondents**

**COMPLAINT**

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77

4. Respondents have been rendering unmetered water service to the public for compensation since at least June 15, 1985.

5. Respondents do not have a certificate of public convenience issued by this Commission authorizing the provision of water service to the public.

6. On June 26, 1985 and November 3, 1986 Commission Staff sent letters to the former owner of Sun Valley, Mrs. Claire Cameron, widow of William Cameron (prior former owner) and mother of Respondents, Robert Cameron and Donald Cameron, stating that Sun Valley was providing water service in violation of the Public Utility Code. On September 8, 1986, Commission Staff sent a similar letter to and Mr. Edward Hoffner, Esquire, then attorney-of-record for Respondents, regarding Respondents' repeated violations. In all of the letters, Respondents were advised that an application for a certificate of public convenience needed to be filed.

7. Sometime thereafter, Robert Cameron and Donald Cameron became owners of Sun Valley in place of their mother, Mrs. Claire Cameron.

8. In 2000, 2002, 2004 and 2005, Commission Staff again sent letters notifying Respondents of the necessity to file an application to provide water service pursuant to the Public Utility Code.

9. On April 30, 2005, Respondents attempted to file an application for a certificate of public convenience. However, Respondents failed to perfect the application since they did not provide Commission Staff with information necessary to process the application.

10. Since the filing of the application, the Commission's Bureau of Consumer Services has received numerous informal complaints from Respondents' customers concerning service outages and low water pressure problems.

11. Based upon the information available, it appears that Robert Cameron is no longer responding to Commission correspondence. It also appears that Donald Cameron is in ill health. In any event, it is apparent that neither owner is able or willing to provide water service in accordance with Commission regulations.

12. Respondents, by failing to apply for and receive a certificate of public convenience prior to providing water service to the public for compensation, are in violation of 66 Pa. C.S. §§ 1101, 1102 and 1103.

13. Respondents, by failing to perfect their application, are in violation of 66 Pa. C.S. §§1101, 1102 and 1103.

14. Respondents, by providing service at least since 1985 without having first received a certificate of public convenience, have prevented the Commission from collecting annual assessments in violation of 66 Pa. C.S. § 510.

15. Respondents, by providing service at least since 1985 without having first received a certificate of public convenience, have prevented the Commission from requiring the filing of annual reports in violation of 66 Pa. C.S. §504 and 52 Pa. Code § 65.19.

16. Respondents, by rendering unmetered service, are in violation of the Commission's regulations at 52 Pa. Code §65.7.

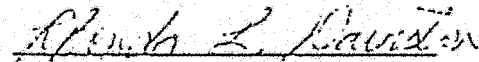
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WHEREFORE, Law Bureau Prosecutory Staff hereby requests that the Commission fine Respondents jointly and severally the total sum of \$15,000 for the numerous violations described in this Complaint and order such other remedy as the Commission may deem appropriate.

Respectfully submitted,



Rhonda L. Daviston

Law Bureau Prosecutory Staff

Attorney I.D. # 49640

P.O. Box 3265

Harrisburg, PA 17105-3265

VERIFICATION

I, William D. Shrader, FUVE, in the Bureau of Fixed Utility Services, hereby state that the facts above set forth in the foregoing Complaint 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 any hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. §4904 (relating to the unsworn falsification to authorities).

Date: 2/15/2006

William D. Shrader  
William D. Shrader, FUVE  
Bureau of Fixed Utilities



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE  
REFER TO OUR FILE  
2000.0200

Date of Service: 2/21/06

Robert Cameron  
Sun Valley Water Company  
P.O. Box 231  
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Donald Cameron  
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Emmaus, PA 18049

C-2006 5889

Law Bureau Prosecutory Staff (2000.0200)

v.

Robert Cameron and Donald Cameron, Owners  
Sun Valley Water Company

DOCUMENT  
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Very truly yours,

James J. McNulty  
Secretary

cc: Rhonda L. Daviston, Assistant Counsel, Law Bureau  
William D. Shrader, FIVE, Bureau of Fixed Utility Services

N-O-T-I-C-E

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James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
P. O. Box 3265  
Harrisburg, PA 17105-3265

**B.** If you fail to answer this Complaint within 30 days, Law Bureau Prosecutory Staff will request that the Commission issue an Order imposing the penalty set forth in the Complaint.

**C.** If you file an Answer that admits or fails to deny the allegations of the Complaint, Law Bureau Prosecutory Staff will request the Commission to issue an Order imposing the penalty set forth in this Complaint.


**D.** If you file an Answer that contests the Complaint, the matter will be assigned to an Administrative Law Judge for hearing and decision. The Judge is not bound by the penalty set forth in the Complaint, and may impose additional and/or alternative penalties as appropriate.

**E.** If you are a corporation, you must be represented by legal counsel. See 52 Pa. Code §§ 1.21-1.22.

**F.** Alternative formats of this material are available for persons with disabilities by contacting the Public Utility Commission at (717) 787-5620.

DATE: March 28, 2006

TO: Bureau of Transportation & Safety

FROM: James J. McNulty, Secretary 

Answers or fines were due to be filed or paid on the following cases.

To this date, no answers have been received on the following:

A-00121953C0601	FULMERS TOWING & RECOVERY, LLC
A-00121982C0601	KLUGE, CHRISTOPHER & RUHL, JAMES
A-00122162C0601	STEEN/RASO TRANSPORT, INC.
C-20065888	SUN COACH LINES INC
C-20065889	SUN VALLEY WATER COMPANY

DOCUMENT  
FOLDER

**DOCKETED**

MAR 30 2006

ORIGINAL

COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

LAW BUREAU PROSECUTORY  
STAFF (2000.0200)

C-2006 - 5889

vs.

ROBERT CAMERON and  
DONALD CAMERON, OWNERS  
SUN VALLEY WATER COMPANY

DOCUMENT  
FOLDER

SECRET

2006 APR -4 AM 9:20

ANSWER TO COMPLAINT

AND NOW comes Donald Cameron and Sun Valley Water  
Company, a Pennsylvania Corporation and Answers the Complaint as follows to  
wit:

1. Denied. In further response thereto, the Sun Valley Water Company is a Pennsylvania Corporation with an address of PO Box 300, Effort, PA 18330.
2. It is specifically denied that Robert Cameron is an owner of Sun Valley Water Company. In further response thereto, he is merely a stockholder.
3. It is specifically denied that Donald Cameron is an owner of Sun Valley Water Company. In further response thereto, he is merely a stockholder.
4. It is specifically denied that the Respondents, Robert Cameron and Donald Cameron have been rendering unmetered water service for the public for compensation since June 15, 1985. Sun Valley Water Company is a Corporation.

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Sun Valley Water Company in it's corporate capacity has been rendering water services to a private community.

5. It is admitted that the Defendants, Donald Cameron and Robert Cameron do not have Certificates of Public Convenience in that they do not operate a Water Company. The Corporation, Sun Valley Water Company, may or may not have a Certificate of Public Convenience. In further response thereto, the Water Company Services a private community and therefore Defendants believe that the Corporation is not required to have such Certificate of Public Convenience.

6. The Respondents, Robert Cameron and Donald Cameron and Sun Valley Water Company, a Pennsylvania Corporation have no knowledge as to what occurred in 1985 between the former majority shareholder, Claire Cameron and the former attorney Edward Hoffner. Therefore proof is demanded.

7. It is specifically denied that Robert Cameron and Donald Cameron became the owners of Sun Valley. In further response thereto, Sun Valley Water Company is a Corporation. The Respondents have no knowledge as to what is meant by the entity Sun Valley. However, on or about December 31, 1999 Claire Cameron did convey her shares of stock to Robert Cameron and Donald Cameron in Sun Valley Water Company Incorporated.

8. The Respondents, Donald Cameron and Robert Cameron and Respondent, Sun Valley Water Company, Inc. have no knowledge of the allegation contained in paragraph eight, as the aforesaid notices are not attached

to the Complaint and therefore, Respondents can not answer with certainty as to what notices were being discussed.

9. It is admitted that the entity Sun Valley Water Company, Inc. attempted to file an application for Public Convenience. Respondents, Donald Cameron and Robert Cameron did not attempt to do so and have never attempted to do so in their individual capacities. Therefore, proof is demanded.

10. The Respondents, have no knowledge as to what complaints the commission has received. Therefore proof is demanded.

11. It is admitted that the Respondent Donald Cameron is in ill health. The knowledge as to what is happening with Robert Cameron is unknown since Robert Cameron is not responding to Donald Cameron. Therefore, proof of all allegations is demanded.

12. The Respondents, after reasonable investigation, have no knowledge of the allegation contained in paragraph twelve and accordingly, the same are deemed denied and proof thereof is demanded. In further response thereto, Respondents, Donald Cameron and Robert Cameron have not been operating a water service company. The Corporation Sun Valley Water Company, Inc. has been involved in the operation of providing water to property owners in the aforementioned Sun Valley Lake Community.

13. The Respondents, after reasonable investigation, have no knowledge of the allegation contained in paragraph thirteen and accordingly, the same are deemed denied and proof thereof is demanded.

14. The Respondents, after reasonable investigation, have no knowledge of the allegation contained in paragraph fourteen and accordingly, the same are deemed denied and proof thereof is demanded at the time of trial. In further response thereto, respondents, Donald Cameron and Robert Cameron have not operated a water company in their individual capacity at any time.


15. The Respondents, after reasonable investigation, have no knowledge of the allegation contained in paragraph fifteen and accordingly, the same are deemed denied and proof thereof is demanded at the time of trial.

16. The Respondents, after reasonable investigation, have no knowledge of the allegation contained in paragraph sixteen and accordingly, the same are deemed denied and proof thereof is demanded at the time of trial.

17. The Respondents, after reasonable investigation, have no knowledge of the allegation contained in paragraph seventeen and accordingly, the same are deemed denied and proof thereof is demanded at the time of trial.

WHEREFORE, Respondents pray this Honorable Court to dismiss the action brought by the law bureau of Prosecutory Staff 2000.0200.

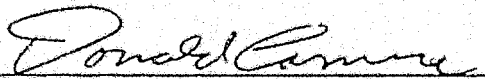
Respectfully Submitted,

  
Donald Cameron

VERIFICATION

I, Donald Cameron, in the above captioned matter verify that the statements set forth in the above Answer to Complaint are true and correct to the best of my knowledge, information and belief.

This Verification is made subject to penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.

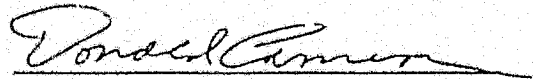
  
Donald Cameron

SECRET  
2003 APR -4 PM 9:20

## VERIFICATION

I, Donald Cameron, President of Sun Valley Water Company, in the above captioned matter verify that the statements set forth in the above Answer to Complaint are true and correct to the best of my knowledge, information and belief.

This Verification is made subject to penalties of 18 Pa. C.S.A. Section 4904 relating to unsworn falsification to authorities.



Donald Cameron, President  
Sun Valley Water Company

2005 APR -4 PM 9:20  
CONFIDENTIAL



John A. Mannisi, M.D., FA  
 Anthony M. Urbano, M.D., F.A.C.C., F.S.C.  
 Praveer Jain, M.D., FA  
 Kenneth A. Bernhard, M.D., FA  
 Robert F. Malacoff, M.D., F.A.C.C., F.S.C.  
 George A. Persin, D.O., FA  
 Nadeem V. Ahmad, M.D., FA  
 Deborah W. Sundlof, D.C., FA  
 Kelly Pompa, C.F.  
 Alma Ohl, C.F.  
 Vicki Roome, C.F.  
 Jody Williams, C.F.  
 Benedict Dorsam,

March 6, 2006

RE: DONALD G CAMERON  
 SS#: 171-32-1996

To Whom It May Concern:

Donald Cameron is a patient of ours with known severe coronary artery disease. He had bypass graft surgery in 2004. He recently was hospitalized at Lehigh Valley Hospital for recurrent chest pain and was documented to have mild to moderate aortic stenosis, preserved global ejection fraction but severe coronary artery disease. He required angioplasty and a PDA. His angina was completely resolved.

The above demonstrates that Mr. Cameron has severe coronary artery disease which has progressed despite bypass graft surgery. He no longer should be exposed to the stress of ownership of Sun Valley Water Company. I strongly urge that he be relieved of these duties.

Should you have any questions, please do not hesitate to call me.

Sincerely,

*Kenneth P. Skorinko, M.D./dm*  
 Kenneth P. Skorinko, M.D., FACC, FSCAI

KPS/dm

2006 MAR 14 PM 9:20  
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