
September 4, 2018

Via E-Filing

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Application of SUEZ Wastewater Pennsylvania, Inc. for the Acquisition of the Township of Mahoning Water System Pursuant to Sections 1102 and 1329 of the Public Utility Code
Docket No. A-2018-3003517

Application of SUEZ Wastewater Pennsylvania, Inc. Pursuant to Section 1329 of the Public Utility Code for Approval of Its Acquisition of the Water System Assets of the Township of Mahoning
Docket No. A-2018-3003519

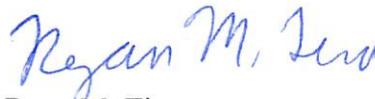
Dear Secretary Chiavetta:

Enclosed please find the Township of Mahoning's Prehearing Conference Memorandum in the above-captioned proceedings.

Please feel free to contact me with any questions.

Very truly yours,

McNERNEY, PAGE, VANDERLIN & HALL



Ryan M. Tira
rtira@mpvhlaw.com

RMT:tmd
cc: ALJ Joel H. Cheskis
Certificate of Service

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of SUEZ Wastewater :
Pennsylvania, Inc. for the Acquisition of :
the Township of Mahoning Water System : Docket No. A-2018-3003517
Pursuant to Sections 1102 and 1329 of the :
Public Utility Code :

Application of SUEZ Wastewater :
Pennsylvania, Inc. Pursuant to Section 1329 :
of the Public Utility Code for Approval of : Docket No. A-2018-3003519
Its Acquisition of the Water System Assets :
of the Township of Mahoning :

PREHEARING CONFERENCE MEMORANDUM

TO: ADMINISTRATIVE LAW JUDGE JOEL H. CHESKIS:

The Township of Mahoning (the "Township") by and through its counsel, McNerney, Page, Vanderlin & Hall submits the following:

1. Ryan M. Tira, Esquire of McNerney, Page, Vanderlin & Hall shall be the person to be listed on the service list with the following contact information:

Address: 433 Market Street, Williamsport, PA 17701
Telephone No.: 570-326-6555
Email: rtira@mpvhlaw.com

2. The Township is open to resolving all issues through amicable resolution of the parties. The Township has and will continue to address concerns by the other parties.

3. Discovery in these proceedings will be conducted according to 52 Pa. Code §§5.321 et. seq. The parties have agreed to discovery rules modifications to assist the parties in meeting the condensed timeline for Section 1329 acquisition proceedings and have filed the executed stipulation regarding discovery rules modifications with ALJ Cheskis on August 20, 2018. Also, pursuant to 52 Pa. Code §§5.322 and 5.331(b), discovery has begun and is ongoing.

4. The Township understands that the parties have agreed to a proposed schedule as set forth below:

Filing Accepted w/Company Direct	August 8, 2018
Other Parties Direct	September 17, 2018
Rebuttal Testimony	September 26, 2018
Surrebuttal Testimony	October 5, 2018
Oral Rejoinder Outlines	October 9, 2018

5. The Township expects to call the following witnesses without being limited thereto:

Dylan W. D'Ascendis, Director
1900 West Park Drive
Suite 250
Westborough, MA 01581
(609) 680-8695

Utility Valuation Expert on the values of the systems that are the subject of the proceeding.

James T.S. Scott, Supervisor
Township of Mahoning
Mahoning Township Municipal
Building
849 Bloom Road
Danville, PA 17821-1351
(570) 275-5521

Mahoning Township Supervisor on the impacts to the users of the systems if the transactions are approved.

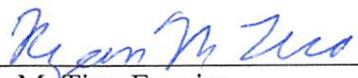
David Walters, PE
Project Manager–Water/Wastewater
Larson Design Group
1000 Commerce Park Drive
Second Floor, Suite 201
Williamsport, PA 17701
(570) 651-1546

Engineer regarding assets included in the transactions.

6. Mahoning Township provides the following list of issues in these proceedings:
- Section 1329 acquisition of municipal water system by regulated public authority with continued provision of services; and
 - Section 1329 acquisition of municipal wastewater system by regulated public utility with continued provision of services.

Respectfully submitted,

McNERNEY, PAGE, VANDERLIN & HALL

By: 
Ryan M. Tira, Esquire
I.D. No. 89338
Attorney for Township of Mahoning

433 Market Street
Williamsport, PA 17701
Telephone: 570-326-6555

Dated: September 4, 2018

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CERTIFICATE OF SERVICE

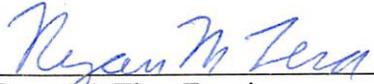
I hereby certify that I am serving the foregoing Prehearing Conference Memorandum dated September 4, 2018, in the manner and upon the persons listed below:

Served via First Class and Electronic Mail

Jonathan Nase, Esquire
David P. Zambito, Esquire
Cozen & O'Connor
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dzambito@cozen.com

Scott B. Granger, Esquire
Carrie B. Wright, Esquire
PA Public Utility Commission
Bureau of Investigation and Enforcement
P.O. Box 3265
Harrisburg, PA 17105-3265
sgranger@pa.gov
cwright@pa.gov

Christine Maloni Hoover
Senior Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923
CHoover@paoca.org



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I.D. No. 89338
Attorney for Township of Mahoning