

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITIES COMMISSION**

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION, BUREAU OF	:	No. P-2024-3051313
INVESTIGATION AND ENFORCEMENT,	:	I-2024-
	:	
v.	:	
	:	
ROCK SPRING WATER COMPANY.	:	

ANSWER TO PETITION FOR ISSUANCE OF AN INTERIM EMERGENCY ORDER

AND NOW COMES, James N. Bryant, Esq., Carolyn M. Larrabee, Esq., and BRYANT LARRABEE, P.C., representing Rock Spring Water Company, who file this Answer to Petition for Issuance of an Interim Emergency Order, and in support thereof, aver as follows:

- 1) Admitted.
- 2) Admitted.
- 3) Admitted.
- 4) Admitted.
- 5) Admitted.
- 6) Admitted.

7) It is admitted that J. Roy Campbell who is a shareholder, and manager of the system for four (4) decades, has not fully cooperated with any entity or current counsel.

- 8) Admitted.
- 9) Admitted.
- 10) Admitted.

11) The Court of Common Pleas agreed with the PUC and dismissed the petition.

12) Admitted.

13) Admitted.

14) Admitted.

15) Admitted.

16) Admitted.

17) Admitted.

18) Admitted.

19) Admitted.

20) Admitted.

21) Admitted.

22) Admitted.

23) Admitted.

24) Admitted.

25) Admitted.

26) Admitted.

27) Denied as stated. SCBWA by virtue of location and staffing is the only sensible choice.

28) Denied as stated. Strict proof thereof is demanded at hearing.

29) Admitted.

30) Admitted.

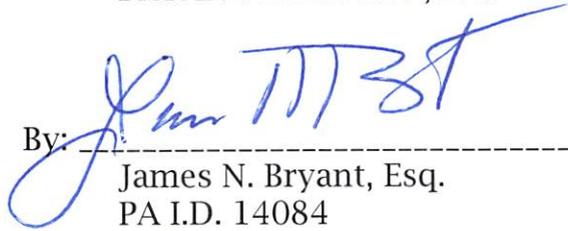
31) Admitted.

- 32) Admitted.
- 33) Denied. No answer required.
- 34) Denied. No answer required.
- 35) Denied. No answer required.

WHEREFORE, since a majority of Rock Spring Water Company shareholders have approved the transfer to SCBWA, and since the present operator has been unable to provide reliable service for at least a decade, it is respectfully submitted that they should be appointed as a receiver immediately.

Respectfully Submitted,

BRYANT LARRABEE, P.C.

By: 

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By: 

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Answer to Petition for Issuance of an Interim Emergency Order was served by depositing the same via electronic mail, addressed to the following:

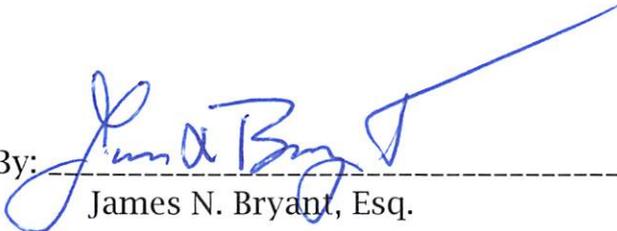
Davis S. Gaines, Jr., Esq. State College Borough Water Authority (SCBWA) 211 Kimport Avenue Boalsburg, PA 16827 Bmix470@gmail.com	Amanda Chaplin, Esq. Glenn P. Masser, Esq. Commonwealth of Pennsylvania Dept. of Environmental Protection 208 West Third Street, Suite 101 Williamsport, PA 17701 achaplin@pa.gov gmasser@pa.gov
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I hereby certify that a true and correct copy of the within Answer to Petition for Issuance of an Interim Emergency Order was served by depositing the same with the United States Postal Service, postage prepaid, to the following addresses:

J. Roy Campbell 4607 West Whitehall Road Pennsylvania Furnace, PA 16865	Sue Campbell 150 Farmers Way Pennsylvania Furnace, PA 16865
Frances Campbell 400 Plainfield Road Pennsylvania Furnace, PA 16865	Charles Williams 140 Fisher Run Road Bloomsburg, PA 17815
Edith Williamson 8795 Old Dumfries Road Catlett, VA 20119	Clay Campbell 401 Plainfield Road Pennsylvania Furnace, PA 16865
C. John Campbell 150 Farmers Way Pennsylvania Furnace, PA 16865	Elizabeth Campbell 4607 West Whitehall Road Pennsylvania Furnace, PA 16865

Emilie Campbell 4607 West Whitehall Road Pennsylvania Furnace, PA 16865	Julie Campbell 2806 Orange Grove Trail Naples, FL 34120
Michael Dodge 2806 Orange Grove Trail Naples, FL 34120	James Harper 5220 West Whitehall Road Pennsylvania Furnace, PA 16865

By: 

James N. Bryant, Esq.

By: 

Carolyn M. Larrabee, Esq.

DATED: 02/07/2025

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v.

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CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Counsel for Rock Spring Water Co.

Signature: _____

Name: James N. Bryant, Esq.

Attorney No. 14084

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TYPE OF PLEADING:

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EMERGENCY ORDER**

**Counsel of Record for this
Party:**

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PA I.D. 14084

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