



COMMONWEALTH OF PENNSYLVANIA

February 18, 2025

E-FILED

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

Re: I&E Petition to Request the Commission Open a Section 529 Investigation into the Acquisition of Rock Spring Water Company / Docket No. P-2024-3051313

Dear Secretary Chiavetta:

Please accept this letter in lieu of a Brief, to the Petition for Interim Emergency Order (“Emergency Petition”), filed on February 6, 2025, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

The OSBA supports the Emergency Petition, filed by the Office of Consumer Advocate (“OCA”), to immediately establish a Receiver for the acquisition of Rock Spring Water Company’s (“Rock Spring”) water system. The OSBA opposes the State College Municipal Authority (“SCMA”) being the Receiver, as SCMA unequivocally stated, at the hearing held on February 14, 2025, that they will not become a certificated public utility. Consequently, the OSBA recommends that receivership be awarded to the Pennsylvania American Water Company for the immediate rehabilitation of the Rock Spring water system.

The OSBA further supports the issuance of fines and/or penalties that the Commission may deem appropriate, due to Rock Spring’s failure to comply with the requirements and regulations of the Pennsylvania Public Utility Commission for certificated public utilities.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Kevin Higgins
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

I&E Petition to Request the Commission :
Open a Section 529 Investigation into the : **Docket No. P-2024-3051313**
Acquisition of Rock Spring Water Company :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable John Coogan
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
jcoogan@pa.gov

Carrie B. Wright, Esquire
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
carwright@pa.gov

Melanie Joy El Atieh, Esquire
Jacob D. Guthrie, Esquire
Emily A. Farren, Esquire
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
OCARockSpring@paoca.org

Elizabeth Rose Triscari, Esquire
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
elizabeth.triscari@amwater.com

Alexander R. Stahl, Esquire
Aqua Pennsylvania Inc.
762 W Lancaster Ave
Bryn Mawr, PA 19010
astahl@aquaamerica.com

J. Roy Campbell
Rock Spring Water Company
1750 Tadpole Road
Furnace, PA 16865
rsw5@comcast.net

Robert A. Mix, Esquire
Robert Mix Law
211 Kimport Avenue
Boalsburg, PA 16827
bmix470@gmail.com

Teresa K. Harrold, Esquire
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
teresa.harrold@amwater.com

James N. Bryant, Esquire
Carolyn M. Larrabee, Esquire
Bryant Larrabee, P.C
107 East Main Street
P.O. Box 551
Millheim, PA 16854
Jnbryant1@verizon.net
cmlarrabee@centrecountylaw.com

David P. Zambito, Esquire
Jonathan P. Nase, Esquire
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
dzambito@cozen.com
jnase@cozen.com

Amanda Chaplin, Esquire
Glenn P. Masser, Esquire
Department of Environmental Protection
Northcentral Regional Office
208 West Third Street, Suite 101
Williamsport, PA 17701
achaplin@pa.gov
gmasser@pa.gov

Elizabeth A. Dupuis, Esquire
Morgan M. Madden, Esquire
Babst, Calland, Clements & Zomnir, P.C.
330 Innovation Blvd., Suite 302
State College, PA 16803
bdupuis@babstcalland.com
mmadden@babstcalland.com

DATE: February 18, 2025

/s/ Steven C. Gray

Senior Attorney
Assistant Small Business Advocate
Attorney I.D. No. 77538