

THE  
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LAW FIRM



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April 28, 2025

VIA E-FILE [edevoe@pa.gov](mailto:edevoe@pa.gov)

The Honorable Emily DeVoe  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
Piatt Place  
301 Fifth Avenue, Suite 220  
Pittsburgh, PA 15222

**Re: Joint Application of Pennsylvania-American Water Company and Corner Water Supply and Service Corporation Pursuant to Section 1102 of the Public Utility Code, for approval of (1) the transfer to Pennsylvania-American Water Company, by sale, of all property of Corner Water Supply and Service Corporation used and useful in the public service; (2) the right of Pennsylvania-American Water Company to begin to offer, render, furnish and supply water service to the public in portions of Elk and Paint Townships in Clarion County, Pennsylvania, and (3) the abandonment by Corner Water Supply and Service Corporation of all water service; Docket Nos. A-2025-3052745 and A-2025-3052747**

Dear Administrative Law Judge DeVoe:

Attached please find the Direct Testimony of Thomas Weaver, President, Corner Water Supply and Service Corporation ("Corner Water") in the above-referenced matters. Copies have been served as shown on the attached Certificate of Service.

Please contact me should you have any questions or concerns regarding this filing. Until that time, I shall remain,

Very truly yours,

Eric E. Cummings, Esquire

EEC/sms

Enclosures: Direct Testimony of Thomas Weaver  
Certificate of Service

cc: As Noted on Attached Certificate of Service  
Matthew L. Homsher, Secretary (Cover Letter & Certificate Only)  
Corner Water Supply and Service Corporation



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Joint Application of Pennsylvania- :  
American Water Company and Corner Water :  
Supply and Service Corporation Pursuant to :  
Section 1102 of the Public Utility Code, for : Docket Nos. A-2025-3052745  
approval of (1) the transfer to Pennsylvania- : A-2025-3052747  
American Water Company, by sale, of all :  
property of Corner Water Supply and Service :  
Corporation used and useful in the public :  
service; (2) the right of Pennsylvania- :  
American Water Company to begin to offer, :  
render, furnish and supply water service to the :  
public in portions of Elk and Paint Townships :  
in Clarion County, Pennsylvania, and (3) the :  
abandonment by Corner Water Supply and :  
Service Corporation of all water service :  
:  
:  
:

**DIRECT TESTIMONY OF  
THOMAS WEAVER., PRESIDENT, OF  
CORNER WATER SUPPLY AND SERVICE CORPORATION**

April 28, 2025

**CORNER WATER STATEMENT NO. 1**

1 **Q: Please state your name for the record.**

2 A: Thomas Weaver. I am the President of Corner Water Supply and Service Corporation  
3 (“Corner Water”).

4 **Q: What is your business address?**

5 A: 113 Oakwood Lane, Shippenville, PA 16254.

6 **Q: Please describe Corner Water.**

7 A: Corner Water has been a regulated public utility corporation since December 2, 1960,  
8 organized and existing under the laws of the Commonwealth of Pennsylvania, engaged in  
9 treating, storing, supplying, distributing, and providing water service to approximately 605  
10 customers, of which, 355 are residential, 83 are commercial, 5 are industrial, 2 are public  
11 fire service and 160 are “other” (i.e., customers in two mobile home park communities),  
12 being located throughout portions of Elk and Paint Townships, Clarion County  
13 (collectively referred to as the “System”).

14 **Q: Can you provide some historical context for this case?**

15 A: My Father, Earl E. Weaver and I inherited Corner Water from William G. Patterson in 1982.  
16 We have done our due diligence with the resources available to keep up with increasingly  
17 complicated government regulations over the past 43 years. Over these years, we had a  
18 problem in keeping our treatment processes permitted as required by the Department of  
19 Environmental Protection (“DEP”). The Department of Environmental Protection has  
20 historically not acted as a proponent of water softening technology alone without secondary  
21 filters in the treatment process to remove raw water iron residuals over 3 parts per million  
22 (“ppm”). Our raw water iron residuals run between 13-18 ppm. Between 2014 and 2017,  
23 Corner Water spent \$20,000 in professional fees and \$15,000 in fines to get water softening

1 units properly permitted and approved. The Corner Water treatment building is not  
2 spacious enough to accommodate the gravel and green sand filters that DEP would prefer.  
3 While this has been a very effective technology to remove high iron residuals, it is very  
4 costly to operate due to the amount of salt required for regeneration of the resin. PAWC  
5 would shut this high cost treatment operation down and beneficially would supply our  
6 customers with its more modern plant in Clarion.

7 **Q: Why are you selling the Company?**

8 A: Corner Water is a small, private family-owned Water Utility. As a result, Corner Water  
9 does not have the revenue or the staff to successfully continue and keep up with what is an  
10 increasingly demanding regulatory environment. We have three (3) employees. Our Office  
11 Manager is seventy (70) years old, I am sixty-five (65) years old, and another employee is  
12 sixty-four (64) years old. No family members or associates have the desire to own Corner  
13 Water. Beyond future planning, Corner Water does not have the resources (financial,  
14 manpower, etc.) to maintain Corner Water's aging infrastructure.

15 **Q: Do you have any financial concerns about running the System?**

16 A: Yes. Again, Corner Water is extremely concerned with ongoing financial viability being a  
17 small operation versus increasing costs relative to aging infrastructure and an increasingly  
18 more demanding regulatory environment.

19 **Q: Are there specific new costs that Corner Water is facing or are costs increasing across  
20 the board?**

21 A: Corner Water's costs are continually increasing across the board and unless drastically  
22 dropped, ongoing financial viability is futile. On July 10, 2024, Corner Water was cited by  
23 DEP for significant deficiencies related to our two source wells. PAWC's witness, Mr.

1 Fiscus, discusses these deficiencies in detail. During the post-inspection consultation,  
2 Corner Water advised PADEP that we would not be upgrading the wells because of the  
3 significant financial burden and our pending sale to PAWC. The wells will not be needed  
4 once the Corner Water system is tied into the Clarion regional system and the vulnerable  
5 sources are abandoned. PADEP has accepted this solution as a remedy to the significant  
6 deficiencies cited in their Notice of Violation. Absent the sale, Corner Water would face  
7 significant financial burden to bring the wells in compliance with today's standards.

8 **Q: Has it been more and more challenging to operate the System and comply with**  
9 **regulatory requirements?**

10 A: Yes. As a small operation, coupled with more and more regulatory requirements equals  
11 ever increasing demands for cash flow in pre-determined periods of time. A larger  
12 operation, such as PAWC, with more cash flow could absorb increasing costs and share  
13 manpower much more efficiently than a small operation like Corner Water. Our customers  
14 will therefore, most certainly benefit from its System becoming integrated and upgraded  
15 with PAWC's financial and manpower related flexibility.

16 **Q. What impact will the transaction have on this situation?**

17 A. Corner Water believes that PAWC has the staff and resources to address all of the issues  
18 that Corner Water is unable to solve. The impact will be that Corner Water customers, who  
19 deserve services at a pinnacled level, will maximize the quality and level of services by  
20 being cared for by PAWC.

21 **Q: Will the rate impact of these increases of the costs and duties you mentioned**  
22 **previously be significant or insignificant to Corner Water's customers if there is no**  
23 **acquisition by PAWC.**

1 A: The impact of increased costs would be very significant to our customers if there is no  
2 acquisition. Again, a large service provider's ability to share costs and spread them  
3 between regions mitigates the potential for drastic rate increases. In contrast, Corner Water  
4 does not have the luxury of spreading and sharing costs during periods of time when  
5 regulatory demands and costs increase disproportionately to rates charged. Absent this sale  
6 approval, it is projected that Corner Water's ability to provide services into the future would  
7 be quite futile.

8 **Q: As President of Corner Water, are you familiar with the regulation compliance**  
9 **required to provide services?**

10 A: Yes.

11 **Q: As President of Corner Water, you are familiar with Corner Water's current**  
12 **infrastructure?**

13 A: Yes.

14 **Q: As President of Corner Water, you are familiar with Corner Water's current rates**  
15 **charged for services rendered?**

16 A: Yes.

17 **Q: As President of Corner Water, you are familiar with the continued likelihood of**  
18 **Corner Water's financial viability when comparing resulting costs to provide services**  
19 **in a compliant fashion versus Corner Water's net cash flow?**

20 A: Yes.

21 **Q: And you would agree that without this sale, future financial viability is unlikely?**

22 A: Yes.

1 **Q: And when comparing what you know about PAWC coupled with your conclusions**  
2 **regarding Corner Water, you agree that this sale would affirmatively promote the**  
3 **level of quality of services provided to your customers?**

4 A: Yes.

5 **Q: And when comparing what you know about PAWC coupled with your conclusions**  
6 **regarding Corner Water, you agree that this sale would affirmatively promote the**  
7 **likelihood of heightened accommodation available to your customers?**

8 A: Yes.

9 **Q: And when comparing what you know about PAWC coupled with your conclusions**  
10 **regarding Corner Water, you agree that this sale would affirmatively promote the**  
11 **likelihood of increased convenience to your customers?**

12 A: Yes.

13 **Q: And when comparing what you know about PAWC coupled with your conclusions**  
14 **regarding Corner Water, you agree that this sale would affirmatively promote the**  
15 **safety of your customers in a substantial way?**

16 A: Yes.

17 **Q: What are you asking the Administrative Law Judge and Commission to do?**

18 A: Respectfully, to approve the transaction described in the Joint Application and in my  
19 testimony above.

20 **Q: Does this conclude your testimony?**

21 A: Yes, but I reserve the right to supplement my testimony with facts subsequently made  
22 relevant and/or as additional relevant issues arise during these proceedings. Thank you.


**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Joint Application of Pennsylvania-American :  
Water Company and Corner Water Supply and :  
Service Corporation Pursuant to Section 1102 of :  
the Public Utility Code, for approval of (1) the : Docket Nos. A-2025-3052745  
transfer to Pennsylvania-American Water : A-2025-3052747  
Company, by sale, of all property of Corner Water :  
Supply and Service Corporation used and useful in :  
the public service; (2) the right of Pennsylvania- :  
American Water Company to begin to offer, :  
render, furnish and supply water service to the :  
public in portions of Elk and Paint Townships in :  
Clarion County, Pennsylvania, and (3) the :  
abandonment by Corner Water Supply and Service :  
Corporation of all water service :

**VERIFICATION**

I, Thomas Weaver, on behalf of Corner Water Supply and Service Corporation, deposes and says that I am authorized to do and make this verification, and the facts contained in the attached Direct Testimony are true and correct to the best of my knowledge, information, and belief. The undersigned understands that false statements made herein are subject to the penalties of 18 Pa.C.S.4904 relating to unsworn falsification to authorities.

Date: 4-18-25

  
Thomas Weaver, President on behalf of  
Corner Water Supply and Service Corporation

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Joint Application of Pennsylvania-American :  
Water Company and Corner Water Supply and :  
Service Corporation Pursuant to Section 1102 of :  
the Public Utility Code, for approval of (1) the : Docket Nos. A-2025-3052745  
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American Water Company to begin to offer, :  
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public in portions of Elk and Paint Townships in :  
Clarion County, Pennsylvania, and (3) the :  
abandonment by Corner Water Supply and Service :  
Corporation of all water service :

**CERTIFICATE OF SERVICE**

I hereby certify I am this 28<sup>th</sup> day of April, 2025, serving the foregoing **Direct Testimony of Thomas Weaver, President, of Corner Water Supply and Service Corporation** upon the following persons in the manner indicated below, which satisfies the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**SERVICE VIA ELECTRONIC MAIL**

The Honorable Emily DeVoe  
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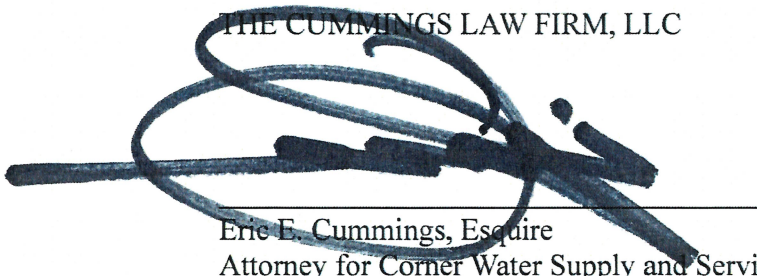
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Date: April 28, 2025

THE CUMMINGS LAW FIRM, LLC



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