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June 4, 2025

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
Harrisburg, PA 17120

**VIA ELECTRONIC FILING**

**RE: City of DuBois Application for a Certificate of Public Convenience to Abandon Public Water Service; Docket No. A-2024-3052728**

Dear Secretary Homsher:

Attached please find for filing with the Pennsylvania Public Utility Commission the Responses of the City of DuBois to the Bureau of Technical Utility Services ("TUS") Set 2 Data Requests, in the above-referenced proceeding. The Verification for this Set 2 will be submitted with the pending response to Set 3.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare'.

Adeolu A. Bakare  
MCNEES WALLACE & NURICK LLC

Counsel to the City of DuBois

cc: James Kennedy [jameskenne@pa.gov](mailto:jameskenne@pa.gov) (Bureau of Technical Utility Services)  
Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

**VIA EMAIL**

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Adeolu A. Bakare

Counsel to the City of DuBois

Dated this 4<sup>th</sup> day of June, 2025, in Harrisburg, Pennsylvania.

Docket No. A-2024-3052728  
Petition of the City of DuBois for Approval of the Right to Abandon  
Water Service to the Public Outside of its Corporate Limits

Responses TUS Data Requests – Set 2

**A-12.** The City of DuBois' (DuBois') response to Data Request A-3 specified that service is provided to Sykesville Borough (Sykesville) pursuant to DuBois' sale for resale tariff rates rather than contract rates. However, in Pages 38-41 of the Commission's Opinion and Order entered March 28, 2017, at Docket No. R-2016-2554150, et. al., for DuBois most recent base rate case proceeding, the Commission adopted DuBois' position that sales to Sykesville were not within the Commission's jurisdiction. Please explain this apparent discrepancy and confirm that DuBois' water services and rates for Sykesville are subject to DuBois' non-jurisdictional rates for water service within its corporate limits rather than DuBois water tariff rates.

**Response:**

The prior response to Data Request A-3 was in error. The Borough of Sykesville is a non-jurisdictional customer as set forth in the March 28, 2017, PUC Order.

**Response Provided by: Benjamin Kafferlin, City of DuBois, Interim City Manager**

**Date: June 4, 2025**

Docket No. A-2024-3052728  
Petition of the City of DuBois for Approval of the Right to Abandon  
Water Service to the Public Outside of its Corporate Limits

Responses TUS Data Requests – Set 2

**A-13.** Please confirm that DuBois' current water service contract with Falls Creek Borough (Falls Creek) was filed with the Commission on August 13, 2021, at Docket R-2016-2554150, or provide a copy of DuBois' current contract with Falls Creek for water service.

**Response:**

Confirmed that the current water contract with Falls Creek was filed with the Commission on August 13, 2021.

**Response Provided by: Benjamin Kafferlin, City of DuBois, Interim City Manager**

**Date: June 4, 2025**

Docket No. A-2024-3052728  
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Responses TUS Data Requests – Set 2

**A-14.** DuBois' response to Data Request A-6 indicated that its Joint Consolidation Board retained consultants to prepare a rate study to develop new uniform rates for the New City customers, and that the rate study will be publicly available upon completion, which is anticipated to occur by June 1, 2025. Please confirm that DuBois will continue to charge its effective water tariff rates for Commission-regulated water services until the Consolidation Date.

**Response:**

Confirmed that the City of DuBois will not modify the water rates charged to PUC-jurisdictional customers until the Consolidation Date.

**Response Provided by: Benjamin Kafferlin, City of DuBois, Interim City Manager**

**Date: June 4, 2025**

Docket No. A-2024-3052728  
Petition of the City of DuBois for Approval of the Right to Abandon  
Water Service to the Public Outside of its Corporate Limits

Responses TUS Data Requests – Set 2

**A-15.** DuBois' response to Data Request A-10 indicated that DuBois would request letters indicating whether the Application is consistent with adopted municipal and county comprehensive plans and zoning ordinances from Sandy Township (Sandy) and Clearfield County and would supplement its response. However, DuBois did not provide a supplemental response. Please provide responses for the following:

- a. Provide a copy of letters from Sandy and Clearfield County indicating whether the Application is consistent with adopted municipal and county comprehensive plans and zoning ordinances; or
- b. If Sandy and/or Clearfield County have not responded to DuBois' letter, verify whether the Application is consistent with adopted county and municipal comprehensive plans and municipal zoning ordinances.

**Response:** The City intends to provide the requested letters, but in the interim, it is the City's understanding that the Application is fully consistent with the respective county and township comprehensive plans and municipal zoning ordinances as the actual water facilities are not being modified as part of the consolidation.

**Response Provided by: Benjamin Kafferlin, City of DuBois, Interim City Manager**

**Date: June 4, 2025**