



McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166

Adeolu A. Bakare
Direct Dial: 717.237.5290
Direct Fax: 717.260.1744
abakare@mcneeslaw.com

June 9, 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 3 Data Requests, in the above-referenced proceeding. The Verification for Set 2 is included with this response.

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', written over a white background.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

Counsel to the City of DuBois

cc: James Kennedy 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

NazAarah Sabree
Small Business Advocate
Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov

Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101
ra-oca@paoca.org

Allison C. Kaster, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P. O. Box 3265
Harrisburg, PA 17105-3265
akaster@pa.gov



Adeolu A. Bakare

Counsel to the City of DuBois

Dated this 9th 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 3

A-16. Pursuant to Section 65.55(a) of Title 52, 52 Pa. Code § 65.55(a), a Class B public utility, Class C public utility or municipal corporation was to file a Lead Service Line Replacement Program (LSLR Program) within two years of the effective date of the section, or by July 22, 2024. On July 22, 2024, the City of DuBois (DuBois) requested an extension of time to file an LSLR Program with the Commission at Docket No. P-2024-3050267. On September 30, 2024, the Commission granted the extension until December 23, 2024. To date, DuBois has not filed an LSLR Program with the Commission or been granted a further extension. However, DuBois is a municipal corporation that provides water public utility service to more than 745 customers outside of its corporate limits and is required to comply with Commission regulations. Please provide evidence that DuBois has filed an LSLR Program petition with the Commission.

Response:

The City of DuBois filed a letter with the Pennsylvania Public Utility Commission on October 16, 2025 at Docket No. P-2024-3050267 requesting a further extension of the time to file an LSLR Program with the Commission through January 31, 2026, to coincide with the anticipated consolidation and abandonment of the City's Certificate of Public Convenience. While the City acknowledges its obligations to comply with Commission regulations, the City submits that it is already committing substantial resources to the intensive process of completing a municipal consolidation and would respectfully ask the Commission to consider that the City was anticipating a ruling on the requested further extension prior to diverting additional resources towards the preparation of an LSLR Program.

Response Provided by:

**Adeolu A. Bakare, McNees Wallace & Nurick LLC, Counsel to City of DuBois
Benjamin Kafferlin, City of DuBois, Interim City Manager**

Date: June 9, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

VERIFICATION

I, Adelou A. Bakare, Counsel to the City of DuBois, hereby state that the facts set above in the responses to TUS Data Request, Set 3 are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: June 9, 2025



Adelou A. Bakare

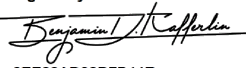
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

VERIFICATION

I, Benjamin Kafferlin, Interim City Manager of the City of DuBois, hereby state that the facts set above in the responses to TUS Data Request, Set 2 are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: June 4, 2025 | 5:43 PM EDT

Signed by:

6EE89AD08D7B44E

Benjamin Kafferlin
Interim City Manager
City of DuBois