

ROBERT MIX LAW

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July 18, 2025

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

In 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

Enclosed please find the State College Borough Water Authority's Amended Prehearing Conference Memorandum for filing in the above-referenced proceeding.

If you should have any questions, please feel free to contact me.

ROBERT MIX LAW

By: 

Enclosure

cc: All Parties on the Attached Certificate of Service (in the manner specified)



VIA ELECTRONIC FILING

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In 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

Docket No. I-2024-

**STATE COLLEGE BOROUGH WATER AUTHORITY'S  
AMENDED PRE-HEARING CONFERENCE MEMORANDUM**

NOW COMES the State College Borough Water Authority (SCBWA) pursuant to 52 PA Code Section 5.222 and submits this pre-hearing conference memorandum.

**A. HISTORY OF THE PROCEEDINGS**

1. Rock Spring Water Company (Rock Spring) is a “public utility” as that term is defined in 66 Pa.C.S.A. Section 102 and, pursuant to a certificate of public convenience issued by the Pennsylvania Public Utility Commission (Commission), has been engaged in the business of providing water service to the public in rural Ferguson Township, Centre County, Pennsylvania since 1947.<sup>1</sup>
2. At present Rock Spring provides public water service to approximately 1000 customers in its service area.<sup>2</sup>
3. On September 20, 2024, the Commission’s Bureau of Investigation and Enforcement (Bureau) filed a Petition to Request the Commission open a

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<sup>1&2</sup> As set forth below, Rock Spring’s system is currently operated by Pennsylvania American Water Company, Inc. (PA American), which was appointed Receiver pursuant to the Honorable John M. Coogan, Administrative Law Judge’s (ALJ Coogan) Order dated February 20 2025.



Section 529 Investigation into the Acquisition of the Rock Spring Water Company (529 Petition) with the Commission.

4. In support of the 529 Petition the Bureau alleges that Rock Spring has violated and / or refused to comply with various standards, rules, regulations and orders of the Commission and the Pennsylvania Department of Environmental Protection (DEP). Paragraphs 13 through 30 of the 529 Petition are incorporated herein by reference.
5. The Office of Consumer Advocate (OCA) filed a Notice of Intervention on October 9, 2024.
6. On October 11, 2024, a hearing notice was issued scheduling a telephonic prehearing conference for Wednesday, October 30, 2024 at 10:00 a.m. and assigning The Honorable John M. Coogan, Administrative Law Judge (ALJ Coogan) to the proceeding.
7. Pennsylvania American Water Company, Inc. (PA American) filed a Petition to Intervene on October 11, 2024.
8. By Order dated October 15, 2024 ALJ Coogan scheduled a Pre- Hearing Conference to be held before him on October 30, 2024 at 10:00 AM.
9. Aqua Pennsylvania, Inc. (Aqua), SCBWA, the Office of Small Business Advocate (OSBA) and the Commonwealth of Pennsylvania, Department of Environmental Protection (DEP) filed Petitions to Intervene on October 17, 2024, October 21, 2024, October 24, 2024 and October 28, 2024, respectively..
10. A Prehearing Conference was held on October 30, 2024.
11. On November 5, 2024, a Prehearing Order was issued by ALJ Coogan, which among other things, granted the Petitions to Intervene filed by OCA, PA American, Aqua, SCBWA, OSBA and DEP.
12. On November 11, 2024, Ferguson Township (Ferguson) filed a Petition to Intervene.
13. By Order dated December 2, 2024 ALJ Coogan granted Ferguson's Petition to Intervene.



14. On January 15, 2025, the Commission issued a Notice scheduling a formal call-in telephonic hearing for the 529 Petition for April 29 and 30, 2025 at 10:00 a.m.
15. On various dates various parties submitted discovery requests to various other parties who responded thereto.
16. On various dates various parties submitted written testimony of their witnesses.
17. On February 6, 2025 OCA filed a Petition for Interim Emergency Order requesting that a Receiver be appointed to manage the operation of the Rock Spring system.
18. On February 7, 2025 the Commission issued a Notice scheduling a telephonic hearing on said Petition on February 14, 2025 at 10:00 a. m. .
19. On February 14, 2025 a telephonic conference was held on said Petition.
20. By Order dated February 20, 2025 ALJ Coogan granted the Petition and certified the Material Question to the Commission.
21. On March 13, 2025, the Commission voted to adopt a Joint Motion by Chairman Stephen M. DeFrank and Commissioner John F. Coleman, Jr. (Joint Motion) which, among other things, answered the Material Question in the affirmative, appointed PA American to serve as interim Receiver for the Rock Spring Water System and directed RSWC to negotiate in earnest for the transfer of its water system to SCBWA.
22. On March 17, 2025, PAWC filed a Motion to Stay the Proceeding which was unopposed.
23. By Order dated March 19, 2025 ALJ Coogan granted the Motion to Stay and suspended the litigation schedule.
24. Over 90 days have elapsed since PA American was appointed Receiver.
25. As of the present date, Rock Spring and SCBWA have not entered into an agreement to transfer Rock Spring's water system to SCBWA.
26. On June 23, 2025 PA American filed a letter requesting that a Prehearing Conference be scheduled.
27. By Order dated June 27, 2024 ALJ Coogan granted said request and scheduled a Prehearing conference on July 23, 2025 at 10:00 a.m.

1-10 January 1955 - the 'pilot' mission (see below)

1-11 January 1955 - the 'pilot' mission (see below)

1-12 January 1955 - the 'pilot' mission (see below)

1-13 January 1955 - the 'pilot' mission (see below)

1-14 January 1955 - the 'pilot' mission (see below)

1-15 January 1955 - the 'pilot' mission (see below)

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1-19 January 1955 - the 'pilot' mission (see below)

1-20 January 1955 - the 'pilot' mission (see below)

1-21 January 1955 - the 'pilot' mission (see below)

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1-23 January 1955 - the 'pilot' mission (see below)

1-24 January 1955 - the 'pilot' mission (see below)

1-25 January 1955 - the 'pilot' mission (see below)

1-26 January 1955 - the 'pilot' mission (see below)

1-27 January 1955 - the 'pilot' mission (see below)

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1-30 January 1955 - the 'pilot' mission (see below)

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1-31 January 1955 - the 'pilot' mission (see below)

1-31 January 1955 - the 'pilot' mission (see below)

**B. NOTICE TO NECESSARY PARTIES (66 PA. C. S. A. SECTION 529(h))**

SCBWA believes that all parties contemplated by 66 PA. C. S. A. Section 529(h) have been served with a copy of the Petition.

It is unknown whether Rock Springs has notified its customers of the filing of the Petition as required by 66 Pa. C. S. A. Section 522 (h).

**C. SERVICE ON THE SCBWA**

The SCBWA will be represented by its solicitor, Robert A. Mix, Esquire, in this proceeding and it agrees to accept electronic service of documents filed in this proceeding *via* electronic service on him. His contact information is as follows:

Robert A. Mix, Esquire  
Robert Mix Law  
211 Kimport Avenue  
Boalsburg, PA 16827  
Phone: (814) 880-2366  
E-mail: [bmix470@gmail.com](mailto:bmix470@gmail.com);  
[bmix@lmgrlaw.com](mailto:bmix@lmgrlaw.com)

**D. ISSUES TO BE PRESENTED**

1. Whether Rock Spring has violated and / or refused to comply with various standards, rules, regulations and orders of the Commission and DEP as alleged more specifically in Paragraphs 13 through 30 of the 529 Petition.
2. Whether Rock Spring has the willingness and the financial, managerial and technical capability to furnish and maintain adequate, efficient and reasonable service and facilities for its customers now and in the future.
3. Whether the alternatives to acquisition of Rock Springs, set forth in 66 Pa. C. S. A. Section 522 (b), are impractical or not economically feasible?
4. Whether the Commission should appoint a capable public utility to acquire Rock Spring and, if so, which capable public utility?



## E. LIST OF WITNESSES AND SUBJECT OF THEIR TESTIMONY

The SCBWA intends to call the following persons as witnesses:

1. Brian Heiser, Executive Director of the SCBWA. Mr. His business address is the State College Borough Water Authority, 1201 West Branch Road, State College, PA 16801 His telephone number is (814) 238-6766 and his e-mail address is [brian@scbwa.org](mailto:brian@scbwa.org). Mr. Heiser will testify as to the history and current operation of the Authority, to include its service area, facilities, infrastructure, managerial and technical abilities, finances and related matters. He will also testify as to the SCBWA's efforts to purchase Rock Spring's water system.
2. Katie McCaulley, Assistant Executive Director of the SCBWA. Her business address is State College Borough Water Authority, 1201 West Branch Road, State College, PA 1680. Her telephone number is (814) 238-6766 and her e-mail address is [katie@scbwa.org](mailto:katie@scbwa.org). Ms. McCaulley will testify as to the history and current operation of the Authority, to include its service area, facilities, infrastructure, managerial and technical abilities, finances and related matters. She will also testify as to the SCBWA's efforts to purchase Rock Spring's water system.
3. Jeffrey Kern, Chairman of the SCBWA. His business address is c/o State College Borough Water Authority, 1201 West Branch Road, State College, PA 1680. His telephone number is (814) 238-6766. Mr. Kern will testify as to the history and current operation of the Authority, to include its service area, facilities, infrastructure, managerial and technical abilities, finances and related matters. He will also testify as to the SCBWA's efforts to purchase Rock Spring's water system.
4. Mark Glenn, P.E., President of Gwin, Dobson & Forman. Mr. Glenn is the SCBWA's consulting engineer. His business address is Gwin, Dobson & Foreman, Inc. 3121 Fairway Drive, Altoona Pennsylvania 16602. His telephone number is (814) 943-5214. Mr. Glenn will testify as to his assessment of Rock Spring's water system, its current operation, facilities and infrastructure and needed improvements to that system.

## LIST OF WITNESSES AND THEIR TESTIMONY

The following is a list of witnesses who have been called to testify in this case. Their names and addresses are given below, along with a brief summary of their testimony.

1. **John Doe**, 123 Main Street, Springfield, MA. Testimony: Saw the defendant on the night of the crime.

2. **Jane Smith**, 456 Elm Street, Springfield, MA. Testimony: Heard the defendant's voice during the incident.

3. **Robert Brown**, 789 Oak Street, Springfield, MA. Testimony: Was present at the scene and saw the defendant flee.

4. **Sarah White**, 101 Pine Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

5. **Michael Green**, 202 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

6. **Laura Black**, 303 Birch Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

7. **David Gray**, 404 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car driving away from the scene.

8. **Emily Red**, 505 Willow Street, Springfield, MA. Testimony: Identified the defendant as the person who saw her on the night of the crime.

9. **James Blue**, 606 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

10. **Patricia Yellow**, 707 Hickory Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

11. **Christopher Purple**, 808 Sycamore Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

12. **Amanda Pink**, 909 Magnolia Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

13. **Benjamin Orange**, 1010 Poplar Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

14. **Sophia Green**, 1111 Chestnut Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

15. **Lucas Blue**, 1212 Walnut Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

16. **Olivia Red**, 1313 Elm Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

17. **Ethan Yellow**, 1414 Oak Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

18. **Ava Purple**, 1515 Pine Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

19. **Noah Blue**, 1616 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

20. **Isabella Red**, 1717 Birch Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

21. **Liam Yellow**, 1818 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

22. **Mia Purple**, 1919 Willow Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

23. **Lucas Blue**, 2020 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

24. **Zoe Red**, 2121 Pine Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

25. **Leo Yellow**, 2222 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

26. **Aria Purple**, 2323 Birch Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

27. **Oliver Blue**, 2424 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

28. **Charlotte Red**, 2525 Willow Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

29. **Benjamin Yellow**, 2626 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

30. **Emily Purple**, 2727 Pine Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

31. **Lucas Blue**, 2828 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

32. **Sophia Red**, 2929 Birch Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

33. **Christopher Yellow**, 3030 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

34. **Ava Purple**, 3131 Willow Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

35. **Noah Blue**, 3232 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

36. **Isabella Red**, 3333 Pine Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

37. **Liam Yellow**, 3434 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

38. **Mia Purple**, 3535 Birch Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

39. **Lucas Blue**, 3636 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

40. **Zoe Red**, 3737 Willow Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

41. **Leo Yellow**, 3838 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

42. **Aria Purple**, 3939 Pine Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

43. **Oliver Blue**, 4040 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

44. **Charlotte Red**, 4141 Birch Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

45. **Benjamin Yellow**, 4242 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

46. **Emily Purple**, 4343 Willow Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

47. **Lucas Blue**, 4444 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

48. **Sophia Red**, 4545 Pine Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

49. **Christopher Yellow**, 4646 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

50. **Ava Purple**, 4747 Birch Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

51. **Noah Blue**, 4848 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

52. **Isabella Red**, 4949 Willow Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

53. **Liam Yellow**, 5050 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

54. **Mia Purple**, 5151 Pine Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

55. **Lucas Blue**, 5252 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

56. **Zoe Red**, 5353 Birch Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

57. **Leo Yellow**, 5454 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

58. **Aria Purple**, 5555 Willow Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

59. **Oliver Blue**, 5656 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

60. **Charlotte Red**, 5757 Pine Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

61. **Benjamin Yellow**, 5858 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

62. **Emily Purple**, 5959 Birch Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

63. **Lucas Blue**, 6060 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

64. **Sophia Red**, 6161 Willow Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

65. **Christopher Yellow**, 6262 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

66. **Ava Purple**, 6363 Pine Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

67. **Noah Blue**, 6464 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

68. **Isabella Red**, 6565 Birch Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

69. **Liam Yellow**, 6666 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

70. **Mia Purple**, 6767 Willow Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

71. **Lucas Blue**, 6868 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

72. **Zoe Red**, 6969 Pine Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

73. **Leo Yellow**, 7070 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

74. **Aria Purple**, 7171 Birch Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

75. **Oliver Blue**, 7272 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

76. **Charlotte Red**, 7373 Willow Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

77. **Benjamin Yellow**, 7474 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

78. **Emily Purple**, 7575 Pine Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

79. **Lucas Blue**, 7676 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

80. **Sophia Red**, 7777 Birch Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

81. **Christopher Yellow**, 7878 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

82. **Ava Purple**, 7979 Willow Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

83. **Noah Blue**, 8080 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

84. **Isabella Red**, 8181 Pine Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

85. **Liam Yellow**, 8282 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

86. **Mia Purple**, 8383 Birch Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

87. **Lucas Blue**, 8484 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

88. **Zoe Red**, 8585 Willow Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

89. **Leo Yellow**, 8686 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

90. **Aria Purple**, 8787 Pine Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

91. **Oliver Blue**, 8888 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

92. **Charlotte Red**, 8989 Birch Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

93. **Benjamin Yellow**, 9090 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

94. **Emily Purple**, 9191 Willow Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

95. **Lucas Blue**, 9292 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

96. **Sophia Red**, 9393 Pine Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

97. **Christopher Yellow**, 9494 Cedar Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

98. **Ava Purple**, 9595 Birch Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

99. **Noah Blue**, 9696 Spruce Street, Springfield, MA. Testimony: Saw the defendant's car parked near the crime scene.

100. **Isabella Red**, 9797 Willow Street, Springfield, MA. Testimony: Identified the defendant as the person who called her on the phone.

101. **Liam Yellow**, 9898 Ash Street, Springfield, MA. Testimony: Saw the defendant's car parked in the street.

102. **Mia Purple**, 9999 Pine Street, Springfield, MA. Testimony: Heard the defendant talking to someone in the neighborhood.

The SCBWA reserves the right to call additional witnesses necessary to respond to discovery materials and testimony or other evidence presented at any hearing. If it chooses to call any additional witnesses, it will notify the Court and Counsel accordingly.

**F. DISCOVERY**

Various parties have served discovery requests on various other parties to which they have responded. It is believed that discovery is complete.

**G. PROPOSED LITIGATION SCHEDULE**

The parties are discussing the following proposed litigation schedule with which the SCBWA is in agreement.

- |  |                  |
|--|------------------|
| 1. Further/Updated Direct Testimony of all parties | 8/27/25          |
| 2. Rebuttal Testimony                              | 9/17/25          |
| 3. Surrebuttal Testimony                           | 10/1/25          |
| 4. Hearings  | 10/14 - 10/15/25 |
| 5. Main Briefs                                     | 10/31/25         |
| 6. Reply Briefs                                    | 11/14/25         |

**H. SETTLEMENT DISCUSSIONS**

The SCBWA has engaged in negotiations with Rock Spring to purchase its water system. No agreement has been reached and Rock Springs has discontinued such negotiations. The SCBWA is still interested in negotiating an agreement to purchase Rock Spring's water system.

The SCBWA is willing to participate in settlement discussions between and among any and all parties to this proceeding.

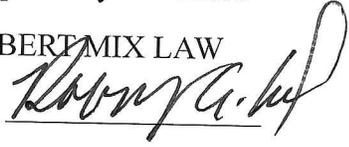
**I. OTHER**

On March 5, 2025 James Bryant, Esquire and Carolyn Larrabee, Esquire, Counsel of record for Rock Spring, filed a Motion to Withdraw Appearance, which ALJ Coogan treated as a Notice of Withdrawal, effective March 19, 2025. Since then, no attorney has entered his or her appearance on behalf of Rock Spring.



Respectfully submitted

ROBERT MIX LAW

By: 

Robert A. Mix, Esquire  
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Boalsburg, PA 16827  
Attorney ID # 16164  
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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In 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

VIA ELECTRONIC FILING

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the State College Borough Water Authority's Amended Prehearing Conference Memorandum upon the persons and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

SERVED VIA ELECTRONIC MAIL ON JULY 18, 2025

The Honorable John M. Coogan  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, Pennsylvania 17120  
[jcoogan@pa.gov](mailto:jcoogan@pa.gov)  
*(Administrative Law Judge)*

Carrie B. Wright, Deputy Chief Prosecutor  
Pennsylvania Public Utility Commission Bureau  
of Investigation and Enforcement  
Commonwealth Keystone Building  
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[carwright@pa.gov](mailto:carwright@pa.gov)  
*(Counsel for PUC I & E)*

Amanda K. Chaplin, Esquire  
Glenn P. Masser, Esquire  
Department of Environmental Protection  
Northeast Regional Office



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(Counsel for DEP)

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(Counsel for OSBA)

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(Counsel for Aqua Penn)

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Teresa Harrold, Esquire  
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(Counsel for PA American)

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1. The first part of the document discusses the importance of maintaining accurate records of all transactions. This is essential for ensuring the integrity of the financial statements and for providing a clear audit trail.

2. The second part of the document outlines the various methods used to collect and analyze data. These methods include direct observation, interviews, and the use of specialized software tools. Each method has its own strengths and limitations, and they are often used in combination to provide a comprehensive view of the data.

3. The third part of the document describes the process of data analysis. This involves identifying patterns, trends, and anomalies in the data. Statistical techniques are often used to quantify these patterns and to test hypotheses about the data.

4. The fourth part of the document discusses the importance of data security. This involves implementing measures to protect the data from unauthorized access, loss, or destruction. This is particularly important in the context of sensitive information, such as financial records or personal data.

5. The fifth part of the document concludes by summarizing the key findings of the study. It emphasizes the need for ongoing monitoring and evaluation of the data collection and analysis process to ensure that it remains effective and relevant over time.

Respectfully submitted

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By:

A handwritten signature in black ink, appearing to read "Robert A. Mix", written over a horizontal line.

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REPORT TO THE BOARD OF DIRECTORS  
ON THE PROGRESS OF THE  
WORK DURING THE YEAR  
1911

THE BOARD OF DIRECTORS  
OF THE  
AMERICAN  
SAVINGS BANK