



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

September 9, 2025

Via Electronic Filing

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

Re: Section 1329 Application of Aqua Pennsylvania, Inc. for the Acquisition of the Water System Assets of the Municipal Authority of the Borough of Greenville situated within the Borough of Greenville, Hempfield Township, Sugar Grove Township, and West Salem Township, Mercer County, Pennsylvania
Docket No. A-2024-3049015
I&E Prehearing Memorandum

Dear Secretary Homsher:

Enclosed for electronic filing is the Bureau of Investigation and Enforcement's ("I&E") Prehearing Memorandum in the above-referenced matter.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads 'Carrie B. Wright'.

Carrie B. Wright
Deputy Chief Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 208185
(717) 783-6156
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CBW/nb
Enclosures

cc: Administrative Law Katrina L. Dunderdale (via email – kdunderdal@pa.gov)
Kayla Loukas, Legal Assistant (via email – kloukas@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Section 1329 Application of Aqua :
Pennsylvania, Inc. for the Acquisition of the :
Water System Assets of the Municipal : Docket No.: A-2024-3049015
Authority of the Borough of Greenville :
situated within the Borough of Greenville, :
Hempfield Township, Sugar Grove Township, :
and West Salem Township, Mercer County, :
Pennsylvania :

**PREHEARING MEMORANDUM
OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT**

TO ADMINISTRATIVE LAW JUDGE KATRINA L. DUNDERDALE:

In accordance with Administrative Law Katrina L. Dunderdale's Prehearing Conference Order, the Bureau of Investigation and Enforcement (I&E) hereby submits this Prehearing Memorandum. The I&E prosecutor assigned to this proceeding is Carrie B. Wright. Ms. Wright may be contacted as follows:

By Mail: Carrie B. Wright
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Fl.
Harrisburg, PA 17120

By E-mail: carwright@pa.gov

Telephone: (717) 783-6156

I. BACKGROUND

On April 25, 2025, Aqua Pennsylvania Wastewater, Inc. (Aqua or Company) filed with the Pennsylvania Public Utility Commission (Commission) its Application pursuant to Sections 1102 and 1329 of the Public Utility Code (Code), related to its acquisition of the water treatment and distribution assets of the Borough of Greenville.

By Secretarial Letter dated August 11, 2025, the Commission informed Aqua that its Application was accepted for filing. Thereafter, Aqua's Application was assigned to the Office of Administrative Law Judge for establishment of an evidentiary record culminating in a Recommended Decision for the Commission's consideration.

A telephonic Prehearing Conference is now scheduled for September 10, 2025, at 9:00 a.m., before ALJ Dunderdale. In accordance with the Prehearing Conference Order, I&E now respectfully submits this prehearing memorandum.

II. ISSUES

Based upon a preliminary review of the filing, I&E has identified the following areas of inquiry, representing a listing of potential issues at this time. However, I&E reserves the right to address such other issues when those issues arise:

- Public Benefits to Buyer;
- Public Benefits to Seller;
- Current And Potential Rates;
- Description of system;
- Cost of Service Study;
- Potential Overall Rate Impact; and
- Overall Recommendation

I&E notes that this listing of issues is provided without analysis of the positions of all parties to this proceeding and while the discovery process is still underway.

Accordingly, I&E necessarily reserves the right to supplement its issue list, to remove issues from this list, and to reassign issues between witnesses as necessary to facilitate the development of a full record in this case. Additionally, most of the issues raised by I&E will be supported by the Direct Testimony of I&E witnesses. If there are issues of Commission policy or legal interpretation that are not properly the subject of testimony or factual issues that are clear on the record and need not be supported by testimony, I&E reserves the right to dispense with testimony when, in its opinion, an issue can be adequately addressed in Brief.

III. WITNESSES

It is currently expected that I&E may call the following witness without being limited thereto:

- Esyan Sakaya, Fixed Utility Valuation Engineer
- Vanessa Okum, Fixed Utility Financial Analyst

The I&E witnesses may be contacted through the contact information listed above for Ms. Wright. I&E notes that this listing of witnesses is provided without analysis of the positions of all parties to this proceeding and while the discovery process is still underway. Accordingly, I&E necessarily reserves the right to supplement its witness list, and to remove witnesses from this list, as necessary to facilitate the development of a full record in this case. The ALJs and all active parties will be notified of any amendments to the I&E witness list.

IV. SCHEDULE

The parties have agreed to the following procedural schedule:

Prehearing Conference (Telephonic)	Wednesday, September 10, 2025 at 9:00 a.m.
Public Input Hearings (in Greenville)	Thursday, September 18, 2025 at 1:00 p.m. and 6:00 p.m.
Other Party Direct Testimony	Friday, September 19, 2025
Rebuttal Testimony and Supplemental Testimony on PIH	Friday, September 26, 2025
Surrebuttal Testimony	Friday, October 3, 2025
Rejoinder Testimony	Tuesday, October 7, 2025 by 2 p.m - written
Evidentiary hearings (in-person, Harrisburg)	Thursday, October 9, 2025 and Friday, October 10, 2025
Receipt of Transcript	Tuesday, October 14, 2025
Main Briefs	Tuesday, October 28, 2025
Reply Briefs and Close of Record	Tuesday, November 4, 2025

V. DISCOVERY

I&E will work with the Parties and the ALJ to develop any necessary discovery modifications.

VI. SERVICE OF DOCUMENTS

For purposes of satisfying in-hand service requirements for discovery responses, prepared testimony, briefs and other documents, I&E requests that electronic delivery of documents satisfy the service requirements without the need to follow up with service of a hard copy of such documents.

VII. SETTLEMENT

I&E intends to participate in any settlement discussions and is willing to work with the parties in an attempt to reach a resolution of any or all issues.

Respectfully submitted,

A handwritten signature in cursive script that reads "Carrie B. Wright".

Carrie B. Wright
Prosecutor
PA Attorney ID No. 308185

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
carwright@pa.gov

Dated: September 9, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Section 1329 Application of Aqua :
Pennsylvania, Inc. for the Acquisition of the :
Water System Assets of the Municipal :
Authority of the Borough of Greenville : Docket No. A-2024-3049015
situated within the Borough of Greenville, :
Hempfield Township, Sugar Grove :
Township, and West Salem Township, :
Mercer County, Pennsylvania :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Prehearing Memorandum** dated September 9, 2025, in the manner and upon the persons listed below:

Service by Electronic Mail Only

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