



Eckert Seamans Cherin & Mellott, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101

TEL: 717 237 6000
FAX: 717 237 6019

Sarah C. Stoner
717.237.6026
sstoner@eckertseamans.com

September 9, 2025

Via Electronic Filing

Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: City of Lock Haven for Petition for Approval of a Lead Service Line Replace Program
Docket No. P-2024-3050183

Dear Secretary Homsher:

Enclosed please find the Joint Petition for Settlement and Statements in Support with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

Sarah C. Stoner
Sarah C. Stoner

Enclosure

cc: Hon. John M. Coogan w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the Joint Petition for Settlement upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

Harrison W. Breitman, Esq.
Melanie J. El Atieh, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
hbreitman@paoca.org
melatieh@paoca.org

Allison Kaster, Esq.
Michael Podskoch, Esq.
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
akaster@pa.gov
mpodskoch@pa.gov

Paul Diskin
Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
pdiskin@pa.gov

Hunter Stover
Water Foreman
City of Lock Haven Water Department
20 E Church Street
Lock Haven, PA 17745
hstover@lockhavenpa.gov

Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
relyttle@pa.gov

Dated: September 9, 2025

Sarah C. Stoner

Sarah C. Stoner, Esq.

Table of Contents

I. INTRODUCTION1
II. BACKGROUND1
III. SETTLEMENT TERMS2
IV. ADDITIONAL TERMS AND CONDITIONS3
V. SETTLEMENT IS IN THE PUBLIC INTEREST5

List of Supporting Appendices

| | |
|------------|--|
| Appendix A | Proposed Conclusions of Law and Ordering Paragraphs |
| Appendix B | City of Lock Haven Water Department Statement in Support |
| Appendix C | Office of Consumer Advocate Statement in Support |

I. INTRODUCTION

The City of Lock Haven Water Department (“Lock Haven” or “City”) and the Office of Consumer Advocate (“OCA”) (collectively, the “Joint Petitioners” or the “Parties”), by their respective counsel, submit and join in this Joint Petition for Settlement (“Settlement” or “Joint Petition”) between and among all active parties in the above captioned proceedings.¹ The Joint Petition represents a full settlement resolving all issues in this proceeding. The Joint Petitioners respectfully request that Administrative Law Judge John M. Coogan (“ALJ”) and the Pennsylvania Public Utility Commission (“Commission” or “PUC”): (1) approve the Settlement without modification; and (2) find that the terms of the Settlement are in accordance with the law and are in the public interest.

In support of this Settlement, the Joint Petitioners state as follows:

II. BACKGROUND

1. On July 19, 2024, Lock Haven filed its Petition for a Lead Service Line Replacement Program (“LSLR Petition”), in accordance with Section 1311(b) of the Public Utility Code, 66 Pa. C.S. § 1311(b), Chapter 65 of the Commission’s regulations, 52 Pa. Code §§ 65.51 *et seq.*, and the Commission’s March 14, 2022 Final Rulemaking Order Implementing Act 120 of 2018 at Docket No. L-2020-3019521.

2. The Office of Small Business Advocate (“OSBA”) filed a Notice of Appearance on August 1, 2024, and a Notice of Intervention on August 8, 2024.

3. The OCA filed a Notice of Intervention on August 21, 2024, and an Amended Notice of Intervention on September 25, 2024.

¹ While the Commission’s Bureau of Investigation and Enforcement (“I&E”) does not join in this Settlement, I&E has authorized the Parties to state its non-opposition to the settlement. Additionally, the Office of Small Business Advocate (“OSBA”) was initially a party to this proceeding but withdrew its intervention via a letter dated April 10, 2025.

4. The Parties engaged in both formal and informal discovery and held settlement discussions regarding Lock Haven’s LSLR Petition and service line inventory.

5. After filing its LSLR Petition, Lock Haven subsequently completed the service line inventory for its service territory. Based on its current service line inventory, Lock Haven has not identified any lead service lines within the jurisdictional areas of its system. Additionally, all jurisdictional service lines initially identified as having an “unknown” lead status have since been confirmed as non-lead. Because the City has not identified any LSLs in the jurisdictional areas, there are no LSLs that would need to be addressed by an LSLR Program.

6. On April 11, 2025, OSBA filed a Letter In Lieu of a Petition to Withdraw its intervention.

7. The Parties now submit this Joint Petition representing a full settlement of the issues raised in this proceeding.

8. Proposed Conclusions of Law and Ordering Paragraphs are attached hereto as Appendix A.

9. Section III below sets forth the agreed-to-proposals that the Joint Petitioners respectfully request the Commission to approve. Appendices B and C include individual Statements in Support of the Settlement from Lock Haven and OCA, respectively, explaining why they support the Settlement (or specific terms of the Settlement).

III. SETTLEMENT TERMS

10. The Joint Petitioners support approval of the terms and conditions that follow.

11. The Parties request and support the withdrawal of the City’s Petition for Approval of a Lead Service Line Replacement Program as filed with the Commission on July 19, 2024,

due to the City completing an updated service line inventory which reflects that no known lead service lines are present in the City's PUC jurisdictional areas.

12. The Parties agree that the City has fully complied with the Commission's regulation requiring the filing of a lead service line replacement program petition.

13. The City will file an updated lead service line inventory with the Commission which reflects that no lead service lines have been identified in the City's PUC jurisdictional areas.

- a. This filing will include a verified statement reflecting that the City is not aware of any lead service lines in its PUC jurisdictional areas.
- b. In its filing, the City will note the number of lead service lines that currently remain in the non-PUC jurisdictional areas of the City.

14. The City agrees to file a Petition for Approval of a Lead Service Line Replacement Program with the Commission within ninety (90) days of the discovery of a lead service line in its PUC jurisdictional areas.

IV. ADDITIONAL TERMS AND CONDITIONS

15. The Commission's approval of the Settlement shall not be construed as approval of any Joint Petitioner's position on any issue, except to the extent required to effectuate the terms and agreements of the Settlement. This Settlement may not be cited as precedent in any future proceeding, except to the extent required to implement the Settlement.

16. It is understood and agreed among the Joint Petitioners that the Settlement is the result of compromise and does not necessarily represent the position(s) that would be advanced by any party in this or any other proceeding, if it were fully litigated.

17. This Settlement is being presented only in the context of this proceeding in an effort to resolve the proceeding in a manner that is fair and reasonable to the Joint Petitioners and consistent with the public interest. The Settlement represents a carefully balanced compromise of the interests of the Joint Petitioners in this proceeding. This Settlement is presented without prejudice to any position which any of the Joint Petitioners may have advanced and without prejudice to the position any of the Joint Petitioners may advance in the future on the merits of the issues in future proceedings, except to the extent necessary to effectuate the terms and conditions of this Settlement.

18. This Settlement is conditioned upon the Commission's approval of the terms and conditions contained herein without modification. If the Commission should disapprove the Settlement or modify any terms and conditions contained herein, Lock Haven or OCA may withdraw from the Settlement, upon written notice to the Commission and all parties within five (5) business days following entry of the Commission's Order and, in such event, the Settlement shall be of no force and effect. In the event that the Commission disapproves the Settlement or Lock Haven or OCA elects to withdraw from the Settlement as provided above, each of the Joint Petitioners reserves their respective rights to fully litigate this case including, but not limited to, presentation of witnesses, cross-examination and legal argument through submission of Testimony, Briefs, Exceptions and Replies to Exceptions.

19. The Joint Petitioners acknowledge and agree that this Settlement, if approved, shall have the same force and effect as if the Joint Petitioners had fully litigated the issues resolved by the Settlement and will result in the establishment of terms and conditions that – until changed on a going-forward basis as provided in the Public Utility Code – are in accordance with the law and in the public interest.

20. If the ALJ, in the Recommended Decision, recommends that the Commission adopt the Settlement as herein proposed without modification, the Joint Petitioners agree to waive the filing of Exceptions with respect to any issues addressed by the Settlement. However, the Joint Petitioners do not waive their rights to file Exceptions with respect to: (a) any modifications to the terms and conditions of this Settlement; or (b) any additional matters proposed by the ALJ in the Recommended Decision. The Joint Petitioners also reserve the right to file Replies to any Exceptions that may be filed.

21. This Settlement may be executed in multiple counterparts, each of which shall be regarded for all purposes as an original; and such counterparts shall constitute but one and the same instrument.

V. SETTLEMENT IS IN THE PUBLIC INTEREST

22. This Settlement was achieved by the Joint Petitioners after an investigation the City's Petition, as informed by Lock Haven's completed lead service line inventory. The Settlement recognizes that Lock Haven has not identified any lead service lines in its PUC jurisdictional areas to date.

23. The Joint Petitioners submit that the Settlement is in the public interest for the following additional reasons:

a. **The Settlement provides a reasonable resolution.** The Settlement represents a balanced compromise of the issues raised by the active parties in this proceeding.

b. **Substantial litigation and associated costs will be avoided.** The Settlement amicably and expeditiously resolves the issues in this proceeding.

c. **The Settlement is consistent with Commission policies promoting negotiated settlements.** The Joint Petitioners arrived at the Settlement after in-depth investigation of Lock Haven's Petition and lead service line inventory. The Settlement contains reasonably negotiated compromises on the issues addressed. Thus, the Settlement is consistent with the Commission's rules and practices encouraging settlements (52 Pa. Code §§ 5.231, 69.391, 69.401-69.406) and is supported by substantial evidence of record.

WHEREFORE, the Joint Petitioners, by their respective counsel, respectfully request that the ALJ approve the Settlement as set forth herein, including all terms and conditions, without modification.

Respectfully submitted,

Sarah C. Stoner

Sarah C. Stoner, Esq.
Daniel Clearfield, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dclearfield@eckertseamans.com
sstoner@eckertseamans.com

Lauren M. Burge, Esq.
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com

*Counsel for
City of Lock Haven Water Department*

/s/ Harrison W. Breitman

Harrison W. Breitman, Esq.
Melanie J. El Atieh, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
hbrietman@paoca.org
melatieh@paoca.org

Counsel for the Office of Consumer Advocate

Dated: September 9, 2025

APPENDIX A

PROPOSED CONCLUSIONS OF LAW

1. The Pennsylvania Public Utility Commission (“Commission”) has jurisdiction over the subject matter and the parties to this proceeding. 66 Pa. C.S. § 1311(b)(2); 52 Pa. Code § 65.54.

2. It is the Commission’s policy to promote settlements. 52 Pa. Code § 5.231.

3. A settlement lessens the time and expense that the parties must expend litigating a case and, at the same time, conserves precious administrative resources. The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding. 52 Pa. Code § 69.401.

4. In order to accept a settlement, the Commission must determine that the proposed terms and conditions are in the public interest. *Pa. Pub. Util. Comm’n v. York Water Co.*, Docket No. R-00049165 (Order entered Oct. 4, 2004); *Pa. Pub. Util. Comm’n v. C.S. Water & Sewer Assocs.*, 74 Pa. PUC 767 (1991). The instant settlement is in the public interest.

5. The settlement and its proposed terms and conditions are in the public interest and, therefore, should be approved without modification.

PROPOSED ORDERING PARAGRAPHS

THEREFORE, IT IS ORDERED:

1. That the Joint Petition for Settlement filed September 9, 2025, by the City of Lock Haven Water Department and the Office of Consumer Advocate at Docket No. P-2024-3050183 is granted, and the Settlement is approved in its entirety without modification.

2. That Lock Haven's Lead Service Line Replacement Plan is withdrawn, consistent with the Settlement.

3. That Lock Haven is directed to file an updated lead service line inventory which reflects that no lead service lines have been identified in the City's PUC jurisdictional area. This filing must include a verified statement and identification of the number of lead service lines currently remaining in non-PUC jurisdictional areas of the City, consistent with the Settlement.

4. That Lock Haven is directed to file a Petition for Approval of a Lead Service Line Replacement Program with the Commission within ninety (90) days if the City discovers a lead service line in its PUC jurisdictional areas.

APPENDIX B

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of City of Lock Haven Water :
Department for a Lead Service Line : Docket No. P-2024-3050183
Replacement Program :

**STATEMENT IN SUPPORT OF THE
JOINT PETITION FOR SETTLEMENT
OF THE CITY OF LOCK HAVEN WATER DEPARTMENT**

The City of Lock Haven Water Department (“Lock Haven” or the “City”) hereby submits this Statement in Support of the Joint Petition for Settlement (“Settlement” or “Joint Petition”) in the above-captioned proceeding. The Settlement is joined by the Office of Consumer Advocate (“OCA”).¹ The Settlement represents a full resolution of all issues by all parties in this proceeding.

Lock Haven believes the Settlement is in the best interests of its customers and the City. The Settlement recognizes that Lock Haven has not identified any lead service lines in the PUC jurisdictional areas of its service territory and provides a process for the City to submit a Lead Service Line Replacement (“LSLR”) Plan in the event that it does identify a lead service line in its PUC jurisdictional area in the future. The Settlement avoids the unnecessary expense of litigating the details of an LSLR Plan given that no lead service lines have been identified in the jurisdictional areas, while still protecting public health by requiring a LSLR Plan to be filed if a lead service line is discovered in the future. For these reasons and as discussed below, Lock Haven

¹ See Joint Petition at 1. The Commission’s Bureau of Investigation and Enforcement (I&E) does not oppose the settlement, and the Office of Small Business Advocate (“OSBA”) initially intervened but later withdrew its intervention in this matter.

submits that the Settlement represents a reasonable resolution of this proceeding, is in the public interest, and should be approved without modification.²

I. BACKGROUND

On July 19, 2024, Lock Haven filed its Petition for a Lead Service Line Replacement Program (“LSLR Petition”), in accordance with Section 1311(b) of the Public Utility Code, 66 Pa. C.S. § 1311(b), Chapter 65 of the Commission’s regulations, 52 Pa. Code §§ 65.51 *et seq.*, and the Commission’s March 14, 2022 Final Rulemaking Order Implementing Act 120 of 2018 at Docket No. L-2020-3019521. The LSLR Petition sought approval of an LSLR Program in order to comply with Chapter 65 of the Commission’s regulations.

The procedural history is discussed in greater detail in the Joint Petition.³ The parties engaged in discovery and participated in settlement discussions to try to achieve a settlement of some or all of the issues in this case. As a result of these settlement negotiations, the Joint Petitioners were able to reach a Settlement on all issues as set forth in the Joint Petition. For the reasons discussed herein, the Settlement is in the public interest and should be approved without modification.

II. THE SETTLEMENT IS IN THE PUBLIC INTEREST AND SHOULD BE APPROVED WITHOUT MODIFICATION

A. Standard of Review of Settlements

The Commission encourages parties in contested on-the-record proceedings to settle cases.⁴ Settlements eliminate the time, effort and expense the parties must expend litigating a case and at the same time conserve administrative resources. Such savings benefit not only the individual parties, but also the Commission and all ratepayers of a utility, who otherwise may have

² See Joint Petition at ¶¶ 22-23.

³ Joint Petition at ¶¶ 1-7.

⁴ See 52 Pa. Code § 5.231.

to bear the financial burden such litigation necessarily entails. The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding.⁵

The focus of inquiry for determining whether a proposed settlement should be recommended for approval is not a “burden of proof” standard, as is utilized for contested matters.⁶ Instead, the benchmark for determining the acceptability of a settlement or partial settlement is whether the proposed terms and conditions are in the public interest.⁷

By definition, a “settlement” reflects a compromise of the positions that the parties of interest have held, which arguably fosters and promotes the public interest. When active parties in a proceeding reach a settlement, the principal issue for Commission consideration is whether the agreement reached suits the public interest.⁸ In their supporting statements, the Joint Petitioners conclude, after discovery and discussion, that this Settlement resolves all issues in this case, fairly balances the interests of the City and its ratepayers, is in the public interest, and is consistent with the requirements of the Public Utility Code.

Not every issue was of equal concern to every Joint Petitioner. Accordingly, each of the Joint Petitioners’ statements in support does not necessarily address each and every aspect of the Settlement.

⁵ 52 Pa. Code § 69.401.

⁶ See, e.g., *PUC v. Borough of Schuylkill Haven Water Department*, Docket No. R-2015-2470184, et al., Opinion and Order entered Oct. 22, 2015 adopting the Recommended Decision dated Sept. 1, 2015 at 9-10, 2015 Pa. PUC LEXIS 422; *PUC v. City of Lancaster – Bureau of Water*, Docket Nos. R-2010-2179103, et al., Opinion and Order entered July 14, 2011, at 11; *Warner v. GTE North, Inc.*, Docket No. C-00902815, Opinion and Order entered April 1, 1996, 1996 Pa. PUC LEXIS 78.

⁷ *Id.*; see also *PUC v. Allied Utility Services, Inc.*, Docket No. R-2015-2479955, et al., Opinion and Order entered April 7, 2016 adopting the Recommended Decision dated Feb. 26, 2016 at 8, 2016 Pa. PUC LEXIS 73.

⁸ See, e.g., *PUC v. York Water Co.*, Docket No. R-00049165, Opinion and Order entered Oct. 4, 2004 adopting the Recommended Decision dated Aug. 30, 2004.

B. Settlement Terms

The Settlement requests and supports the withdrawal of Lock Haven’s LSLR Petition.⁹ The City has completed an updated service line inventory that did not identify any known lead service lines in Lock Haven’s PUC jurisdictional areas.¹⁰ The Settlement reflects that there are no jurisdictional lead service lines to be replaced and therefore the proposed LSLR Plan should be withdrawn. The Parties further agreed that the City has complied with the Commission’s regulations by filing a LSLR Petition as required.¹¹

Through the Settlement, Lock Haven has agreed to file certain information with the Commission which reflects that no lead service lines have been identified in the City’s PUC jurisdictional areas.¹² Specifically, Lock Haven will file an updated service line inventory, accompanied by a verified statement, establishing that the City is not aware of any lead service lines in its PUC jurisdictional areas.¹³ In addition, Lock Haven has agreed to note in its filing the number of lead service lines that currently remain in place in the non-PUC jurisdictional areas of the City. While such lead service lines are outside the Commission’s jurisdiction, Lock Haven will provide the number of remaining lead service lines in non-jurisdictional areas for informational purposes.

In the event that Lock Haven were to discover a lead service line in its PUC jurisdictional areas in the future, the Settlement provides that Lock Haven will file a new Petition for Approval of a Lead Service Line Replacement Program with the Commission within 90 days of identifying such a lead service line.¹⁴ This term ensures that if a LSLR Program becomes necessary in the

⁹ Joint Petition at ¶ 11.
¹⁰ Joint Petition at ¶ 11.
¹¹ Joint Petition at ¶ 12.
¹² Joint Petition at ¶ 13.
¹³ Joint Petition at ¶ 13, 13(a).
¹⁴ Joint Petition at ¶ 14.

future, Lock Haven will file a Petition to propose a program to address the identified lead service line(s) in a timely manner.

III. CONCLUSION

The Settlement represents a reasonable resolution of all issues raised by all parties in this proceeding. Its terms are in the public interest as they recognize that Lock Haven's current service line inventory has not identified any lead service lines in PUC jurisdictional areas of its system, while also providing a process for Lock Haven to file a new LSLR Petition if it were to identify lead service line(s) in its PUC jurisdictional areas in the future. Accordingly, for the reasons set forth above and in the Joint Petition, Lock Haven submits that the Settlement is in the public interest and should be approved without modification.

Respectfully submitted,

Sarah C. Stoner

Sarah C. Stoner, Esq.
Daniel Clearfield, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
717.237.6000 (telephone)
717.237.6019 (fax)
sstoner@eckertseamans.com
dclearfield@eckertseamans.com

Lauren M. Burge, Esq.
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
412.566.2146 (telephone)
412.566.6099 (fax)
lburge@eckertseamans.com

Dated: September 9, 2025

*Counsel for the City of Lock Haven Water
Department*

APPENDIX C

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of City of Lock Haven Water :
Department for a Lead Service Line :
Replacement Program :
Docket No. P-2024-3050183

STATEMENT OF SUPPORT
OF THE
OFFICE OF CONSUMER ADVOCATE

I. INTRODUCTION

On July 19, 2024, the City of Lock Haven Water Department (Lock Haven or City) filed a Petition for a Lead Service Line Replacement Program (Petition).

On August 1, 2023, the Office of Small Business Advocate (OSBA) filed a Notice of Appearance. On August 8, 2024, the OSBA filed a Notice of Intervention.

On August 21, 2024, the Office of Consumer Advocate (OCA) filed a Notice of Intervention and Public Statement. On September 25, 2024, the OCA filed an Amended Notice of Intervention.

On October 29, 2024, the OCA issued formal discovery. The parties also engaged in informal discovery and held settlement discussions regarding Lock Haven’s Petition. Lock Haven subsequently informed the OCA that it completed its service line inventory for its jurisdictional service territory and that, based on its current service line inventory, Lock Haven did not identify any lead service lines within the jurisdictional area of its system. As the City did not identify any lead service lines (LSLs) in the jurisdictional area, the City informed the OCA that there were no LSLs to be addressed by a Lead Service Line Replacement (LSLR) program.

On April 11, 2025, OSBA filed a Letter in Lieu of a Petition to Withdraw its intervention.

The OCA, one of the signatory parties to the Joint Petition for Settlement (Settlement), finds the terms and conditions of the Settlement to be in the public interest.

II. STATEMENT IN SUPPORT

Lead service lines pose a direct health risk to customers. An LSLR program can protect public health by helping to ensure the timely removal of the customer-owned LSL. Section 1311(b)(2) of the Public Utility Code provides a process to eliminate the individual financial burden for replacing customer-owned LSLs by recovering those costs over the City's entire customer base.

However, as there are no LSLs in the City's jurisdictional service territory, the Settlement requests and supports the withdrawal of the City's Petition for Approval of a Lead Service Line Replacement Program as filed with the Commission on July 19, 2024, due to the City completing an updated service line inventory which reflects that no known lead service lines are present in the City's jurisdictional areas. Settlement at ¶ 11. Under the Settlement, the parties agree that the City has fully complied with the Commission's regulation requiring the filing of a lead service line replacement program petition given that no lead service lines were discovered in the City's jurisdictional service territory. Settlement at ¶ 12.

Additionally, under the Settlement, the City will file an updated lead service line inventory with the Commission which reflects that no lead service lines have been identified in the City's PUC jurisdictional areas. Settlement at ¶ 13. This filing will include a verified statement reflecting that the City is not aware of any lead service lines in its PUC jurisdictional areas. Settlement at ¶ 13(a). In its filing, the City will note the number of lead service lines that currently remain in the non-PUC jurisdictional areas of the City. Settlement at ¶ 13(b). The City agrees to file a Petition

for Approval of a Lead Service Line Replacement Program with the Commission within ninety (90) days of the discovery of a lead service line in its PUC jurisdictional areas. Settlement at ¶ 14.

As such, under the Settlement, while the City is not required to provide the number of lead service lines that currently remain in the non-Commission jurisdictional service territory, the City agreed to publish the number of lead service lines that currently remain in the non-Commission jurisdictional areas of the City. The Settlement enhances transparency regarding this important public health issue. The Settlement is in the public interest and should be approved.

III. CONCLUSION

The OCA finds the Settlement to be in the public interest and in the interest of Lock Haven's customers. For these reasons and the reasons discussed above, the terms and conditions of the Settlement should be approved by the Commission.

Respectfully submitted,

/s/ Harrison W. Breitman

Harrison W. Breitman
Assistant Consumer Advocate
PA Attorney I.D. # 320580
HBreitman@paoca.org

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
(717) 783-5048

Melanie Joy El Atieh
Deputy Consumer Advocate
PA Attorney ID # 209323
melatieh@paoca.org

Date: September 8, 2025

Counsel for:
Darryl A. Lawrence
Consumer Advocate