

October 7, 2025

**Via E-File**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105

RE: Application of Aqua Pennsylvania, Inc. Section 1329 Application for the  
Acquisition of the Borough of Greenville Water System  
Docket No. A-2024-3049015 – Joint Motion for Cancellation of Hearings

Dear Secretary Homsher:

Enclosed please find a Joint Motion for Cancellation of the Evidentiary Hearings and Joint Stipulation for Admission of Evidence by Aqua Pennsylvania, Inc., the Office of Consumer Advocate, the Office of Small Business Advocate, the Pennsylvania Public Utility Commission's Bureau of Investigation & Enforcement, and Intervenors Borough of Greenville and the Municipal Authority of the Borough of Greenville.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Courtney L. Schultz

Encls.

cc: All Parties Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**Administrative Law Judge Katrina Dunderdale, Presiding**

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<b>Application of Aqua Pennsylvania, Inc.</b>	<b>:</b>	<b>Docket No. A-2024-3049015</b>
<b>Pursuant to Sections 1102, 1329, and 507 of</b>	<b>:</b>	
<b>the Public Utility Code, for Approval of the</b>	<b>:</b>	
<b>Acquisition by Aqua of the Water System</b>	<b>:</b>	
<b>Assets of the Municipal Authority of the</b>	<b>:</b>	
<b>Borough Of Greenville Situated within the</b>	<b>:</b>	
<b>Borough of Greenville, Hempfield Township,</b>	<b>:</b>	
<b>Sugar Grove Township and West Salem</b>	<b>:</b>	
<b>Township, Mercer County, Pennsylvania</b>	<b>:</b>	

**JOINT MOTION FOR CANCELLATION  
OF THE EVIDENTIARY HEARINGS**

Aqua Pennsylvania, Inc. (“Aqua”), the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), and the Pennsylvania Public Utility Commission’s (the “Commission”) Bureau of Investigation and Enforcement (“I&E”), along with Intervenors the Borough of Greenville and the Municipal Authority of the Borough of Greenville (“GWA”), (collectively the “Parties”) file this Joint Motion for Cancellation of the Evidentiary Hearings scheduled for October 9 and October 10, 2025, and in support of the Motion aver as follows:

1. On April 25, 2025 Aqua filed an Application with the Commission for approval of its acquisition of the water system assets of the GWA pursuant to Sections 1102 and 1329 of the Public Utility Code (the “Code”). The Application also includes a request for approval of certain municipal contracts pursuant to Section 507 of the Code.

2. Aqua responded to data requests for additional information from the Commission’s Bureau of Technical Utilities Services (“TUS”) on June 13, 2025 and submitted an updated Application along with updated Aqua Statement Nos. 1, 2, and 6 and Greenville Statement No. 3.

Aqua provided further responses and supplemental information to TUS' data requests on June 23 and 25, 2025.

3. By Secretarial Letter dated June 30, 2025, the Commission, *inter alia*, conditionally accepted the Application for filing and directed Aqua to serve copies of the Application upon designated entities, to provide individualized notice to affected customers, and to publish notice of the filing of the Application in a newspaper of general circulation.

4. Aqua complied with the requirements of the conditional acceptance letter. The Commission, thereafter, by Secretarial Letter dated August 11, 2025, informed Aqua that it accepted the Application for filing.

5. The matter was assigned to the Office of Administrative Law Judge for disposition. Administrative Law Judge Katrina Dunderdale was assigned to preside over the proceeding.

6. The parties submitted testimony pursuant to the litigation schedule established in the Prehearing Order dated September 22, 2025.

7. Additionally, Aqua and GWA responded to various discovery requests from OCA.

8. In light of the Parties agreeing to waive cross-examination of the witnesses, the Parties agree that the evidentiary hearings that are set to take place on October 9 and October 10, 2025 will no longer be necessary.

9. As such, the Parties request that the evidentiary hearings be cancelled. In compliance with the Interim Order dated September 23, 2025, please note that: (i) this request is unanimous, (ii) the parties agree to waive cross-examination of all witnesses who filed testimony in this proceeding, and (3) the Parties are filing a Joint Stipulation for Admission of Evidence concurrently with this Joint Motion, which is attached hereto as Exhibit A.

**WHEREFORE**, for the foregoing reasons, Aqua Pennsylvania, Inc., the Office of Consumer Advocate, the Office of Small Business Advocate, the Commission's Bureau of Investigation and Enforcement, the Borough of Greenville, and the Municipal Authority of the Borough of Greenville respectfully request that ALJ Dunderdale grant this Motion for Cancellation of the Evidentiary Hearings.

Respectfully submitted,

**AQUA PENNSYLVANIA, INC.**

By: /s/ Courtney L. Schultz  
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**BUREAU OF INVESTIGATION AND ENFORCEMENT**

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**OFFICE OF CONSUMER ADVOCATE**

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Date: October 7, 2025

**OFFICE OF SMALL BUSINESS ADVOCATE**

By: /s/ Rebecca Lyttle  
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**BOROUGH OF GREENVILLE AND MUNICIPAL AUTHORITY OF THE BOROUGH OF GREENVILLE**

By: /s/ James Douglas  
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*Counsel for Municipal Authority of the Borough of Greenville and Greenville Borough*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**Administrative Law Judge Katrina Dunderdale, Presiding**

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<b>Application of Aqua Pennsylvania, Inc.</b>	<b>:</b>	<b>Docket No. A-2024-3049015</b>
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<b>Borough Of Greenville Situated within the</b>	<b>:</b>	
<b>Borough of Greenville, Hempfield Township,</b>	<b>:</b>	
<b>Sugar Grove Township and West Salem</b>	<b>:</b>	
<b>Township, Mercer County, Pennsylvania</b>	<b>:</b>	

**CERTIFICATE OF SERVICE**

I, Courtney L. Schultz, hereby certify that a true and correct copy of the Joint Motion in connection with the above-referenced docket was served on the following individuals on this 7th day of October, 2025, as indicated below.

**VIA ELECTRONIC MAIL**

PA PUC (via E-Filing)  
Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
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Harrisburg, PA 17105

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AQUA

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INTERVENORS

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*Counsel for Aqua Pennsylvania, Inc.*

# **EXHIBIT A**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**Administrative Law Judge Katrina Dunderdale, Presiding**

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<b>Borough of Greenville, Hempfield Township,</b>	<b>:</b>	
<b>Sugar Grove Township and West Salem</b>	<b>:</b>	
<b>Township, Mercer County, Pennsylvania</b>	<b>:</b>	

**JOINT STIPULATION FOR ADMISSION OF EVIDENCE**

Aqua Pennsylvania, Inc. (“Aqua”), the Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate (“OSBA”), and the Pennsylvania Public Utility Commission’s (the “Commission”) Bureau of Investigation and Enforcement (“I&E”), along with Intervenors the Borough of Greenville and the Municipal Authority of the Borough of Greenville (“GWA”), (collectively the “Parties”) submit this Joint Stipulation for Admission of Evidence (“Stipulation”) for the testimony and exhibits listed in Appendix A. This Stipulation is being submitted in conjunction with the Joint Motion for Cancellation of Hearings in accordance with the Interim Order dated September 23, 2025.

Pursuant to the Stipulation, all the Parties to this proceeding have stipulated to the authenticity of the statements and exhibits listed therein and have waived cross-examination of the witnesses sponsoring same.

Accordingly, the Parties to this proceeding request that Administrative Law Judge Dunderdale admit into the evidentiary record in this proceeding such statements and exhibits. Upon issuance of an Order granting admission of the statements and exhibits, copies of the

statements and exhibits listed in the Stipulation, together with verifications of all statements and exhibits, will be e-filed with the Secretary of the Commission for entry into the evidentiary record in this case.

Respectfully submitted,

**AQUA PENNSYLVANIA, INC.**

By: /s/ Courtney L. Schultz  
Courtney L. Schultz, Esq.  
Kruti B. Patel, Esq.  
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[Kruti.patel@saul.com](mailto:Kruti.patel@saul.com)  
*Counsel for Aqua Pennsylvania, Inc.*

**BUREAU OF INVESTIGATION AND ENFORCEMENT**

By: /s/ Carrie B. Wright  
Carrie B. Wright, Esquire  
[carwright@pa.gov](mailto:carwright@pa.gov)

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By: Katie Kennedy  
Katie Kennedy,  
[kkennedy@paoca.org](mailto:kkennedy@paoca.org)  
Harrison Breitman  
[Hbreitman@paoca.org](mailto:Hbreitman@paoca.org)

Date: October 7, 2025

**OFFICE OF SMALL BUSINESS ADVOCATE**

By: /s/ Rebecca Lyttle  
Rebecca Lyttle  
Assistant Small Business Advocate  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

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By: /s/ James Douglas  
James E. Douglas, Esq.  
[jedouglas@douglasjoseph.com](mailto:jedouglas@douglasjoseph.com)  
*Counsel for Municipal Authority of the Borough of Greenville and Greenville Borough*

**Docket No. A-2024-3049015**  
**Stipulated Hearing Exhibit List**

<b>Exhibit No.</b>	<b>Party</b>	<b>Exhibit Description</b>
1.	Aqua	Application with Exhibits A – II filed on April 25, 2025 <sup>1</sup>
2.	Aqua	Letter to Sec. Homsher encl. Aqua’s Responses, Supplemental Information, and Updates to Application Exhibits to TUS Information Request Nos. 1-10, filed on June 13, 2025 <sup>2</sup>
3.	Aqua	Letter to Sec. Chiavetta encl. Aqua’s Responses, Supplemental Information, and Updates to Application Exhibits to TUS Information Request No. 3 filed on June 23, 2025
4.	Aqua	Letter to Sec. Chiavetta encl. Aqua’s Responses, Supplemental Information, and Updates to Application Exhibits to TUS Information Request No. 9 filed on June 25, 2025
5.	Aqua	Application Ex. Y – Verified Updated Direct Testimony of William C. Packer, including Appendices A and B (Aqua Statement No. 1) <sup>3</sup>
6.	Aqua	Application Ex. Z – Verified Updated Direct Testimony of Zach Martin (Aqua Statement No. 2) (adopted by Todd M. Duerr) (Public) <sup>4</sup>
7.	Aqua	Application Ex. Z – Verified Updated Direct Testimony of Zach Martin (Aqua Statement No. 2) (adopted by Todd M. Duerr) (Highly Confidential) <sup>5</sup>
8.	Aqua	Application Ex. AA – Verified Direct Testimony of Scott Steffy, including Appendix A (Aqua Statement No. 3)
9.	Aqua	Application Ex. BB – Verified Direct Testimony of Sumit Nair (Aqua Statement No. 4) (Public)
10.	Aqua	Application Ex. BB – Verified Direct Testimony of Sumit Nair (Aqua Statement No. 4) (Highly Confidential)
11.	Aqua	Application Ex. CC – Verified Direct Testimony of Rita Black (Aqua Statement No. 5)
12.	Aqua	Application Ex. DD – Verified Updated Direct Testimony of Harold Walker, III, including Appendix HW-1 (Aqua Statement No. 6) <sup>6</sup>
13.	Aqua	Verified Rebuttal Testimony of William C. Packer, including WCP-1-R (Aqua Statement No. 1-R)
14.	Aqua	Verified Rebuttal Testimony of Todd Duerr (Aqua Statement No. 2-R)
15.	Aqua	Verified Rebuttal Testimony of Rita Black (Aqua Statement No. 5-R)
16.	Aqua	Verified Rebuttal Testimony of Harold Walker, III (Aqua Statement No. 6-R)

<sup>1</sup> Includes public and confidential versions of Exhibits and Supporting Workpapers filed confidentially with the Commission on April 25, 2025.

<sup>2</sup> Includes public and confidential versions of information filed confidentially with the Commission on June 13, 2025.

<sup>3</sup> Exhibit Y is the version as updated on June 13, 2025.

<sup>4</sup> Exhibit Z is the version as updated on June 13, 2025.

<sup>5</sup> Exhibit Z is the version as updated on June 13, 2025.

<sup>6</sup> Exhibit DD is the version as updated on June 13, 2025.

<b>Exhibit No.</b>	<b>Party</b>	<b>Exhibit Description</b>
17.	Aqua	Verified Rejoinder Testimony of [xxx] (Aqua Statement No. x-RJ) <sup>7</sup>
18.	GWA	Application Ex. V – Verified Direct Testimony of Thomas Strahler, (Greenville Statement No. 1)
19.	GWA	Application Ex. W – Verified Direct Testimony of Jasson W. Urey, including Appendix A (Greenville Statement No. 2)
20.	GWA	Application Ex. X – Verified Updated Direct Testimony of Dylan D’Ascendis, including Attachment A (Greenville Statement No. 3) <sup>8</sup>
21.	GWA	Verified Rebuttal Testimony of Thomas Strahler (Greenville Statement No. 1-R)
22.	GWA	Verified Rebuttal Testimony of Jasson Urey (Greenville Statement No. 2-R)
23.	GWA	Verified Rebuttal Testimony of Dylan D’Ascendis (Greenville Statement No. 3-R)
24.	GWA	Verified Rejoinder Testimony of [xxx] (Greenville Statement No. x-RJ) <sup>9</sup>
25.	OCA	Verified Direct Testimony of David J. Garrett (OCA Statement No. 1) with Exhibits DJG-1 through DJG-14.
26.	OCA	Verified Surrebuttal Testimony of David J. Garrett (OCA Statement No. 1-SR)
27.	I&E	Verified Direct Testimony of Esyan A. Sakaya including Appendix A (I&E Statement No. 1)
28.	I&E	Verified Direct Testimony of Vanessa Okum including Appendix A (I&E Statement No. 2)
29.	I&E	Verified Surrebuttal Testimony of Esyan A. Sakaya (I&E Statement No. 1-SR)
30.	I&E	Verified Surrebuttal Testimony of Vanessa Okum (I&E Statement No. 2-SR)
31.	OSBA	Verified Direct Testimony of Jason Hails with associated Exhibit JH-1 (OSBA Statement No. 1)
32.	OSBA	Verified Surrebuttal Testimony of Jason Hails (OSBA Statement No. 1-SR)

<sup>7</sup> To be updated and replaced with Rejoinder Testimony to be filed by Aqua in accordance with the Interim Order.

<sup>8</sup> Exhibit X is the version as updated on June 13, 2025.

<sup>9</sup> To be updated and replaced with Rejoinder Testimony to be filed by GWA in accordance with the Interim Order.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**Administrative Law Judge Katrina Dunderdale, Presiding**

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**Sugar Grove Township and West Salem : :**  
**Township, Mercer County, Pennsylvania :**

**CERTIFICATE OF SERVICE**

I, Courtney L. Schultz, hereby certify that a true and correct copy of the Joint Stipulation for Admission of Evidence in connection with the above-referenced docket was served on the following individuals on this 7<sup>th</sup> day of October, 2025, as indicated below.

**VIA ELECTRONIC MAIL**

PA PUC (via E-Filing)  
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