



GALLAGHER  
LAW  
GROUP

MICHAEL D. GALLAGHER  
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110 East Diamond Street, Suite 101  
Butler, Pennsylvania 16001  
Phone: 724-282-3141  
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November 6, 2025

***(Via electronic filing)***

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**RE: *Petroleum Valley Regional Water Authority v.  
East Brady Borough  
Complaint Docket No.: C-2024-3051609***

Dear Secretary Chiavetta:

Attached for electronic filing please find a Motion in Limine to Preclude Evidence Regarding any New Well on behalf of Petroleum Valley Regional Water Authority regarding the above-captioned matter.

Copies have been served on the parties as indicated on the Certificate of Service.

Very truly yours,

*/s/ Michael D. Gallagher*

Michael D. Gallagher

MDG:mt  
Attachment

cc: Administrative Law Judge Jeffrey A. Watson *(Via email)*  
Amy R. Schrenpf, Esquire *(Via email and Regular Mail)*  
Petroleum Valley Regional Water Authority  
Attn: Rayne Brothers, Secretary *(Via email)*

**COMMONWEALTH OF PENNSYLVANIA**  
**BEFORE THE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETROLEUM VALLEY  
REGIONAL WATER AUTHORITY

COMPLAINT DOCKET NO.:  
C-2024-3051609

Complainant,

v.

EAST BRADY BOROUGH,

Respondent.

**MOTION IN LIMINE TO PRECLUDE EVIDENCE  
REGARDING ANY NEW WELL**

Filed on Behalf of Complainant:

**PETROLEUM VALLEY REGIONAL  
WATER AUTHORITY**

Counsel of Record for this Party:

Michael D. Gallagher, Esquire  
PA ID No. 59237

Sean M. Gallagher, Esquire  
PA ID No. 318872

GALLAGHER LAW GROUP  
110 East Diamond Street  
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COMMONWEALTH OF PENNSYLVANIA

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETROLEUM VALLEY	:	COMPLAINT DOCKET NO.:
REGIONAL WATER AUTHORITY,	:	C-2024-3051609
	:	
Complainant,	:	
	:	
v.	:	
	:	
EAST BRADY BOROUGH,	:	
	:	
Respondent.	:	

**MOTION IN LIMINE TO PRECLUDE EVIDENCE REGARDING ANY NEW WELL**

AND NOW, comes the Complainant, Petroleum Valley Regional Water Authority (hereinafter "PVRWA"), by and through its attorney, Gallagher Law Group and Michael D. Gallagher, Esquire, and files the herein Motion in Limine to Preclude Evidence Regarding Any New Well as follows:

1. A Complaint was filed by PVRWA with the PUC on October 10, 2024, averring that Respondent, East Brady Borough (hereinafter "EBB"), imposed a 118% rate increase on PVRWA on March 19, 2024, retroactive to March 2, 2024, which said rate increase was unreasonable and discriminatory and therefore invalid in contravention of 66 Pa. C.S. §§ 1301 and 1304 of the Pennsylvania Public Utility Code.
2. EBB filed Preliminary Objections on the basis of jurisdiction, which were dismissed by the Administrative Law Judge by Order dated December 31, 2024.
3. EBB filed an Answer which denied the material allegations on January 16, 2025.
4. Pre-hearing Motions, including Motions in Limine, are due on November 7, 2025, of which this Motion is timely filed.
5. EBB has claimed in public statements that it is looking to build a new well.

6. Despite repeated requests by PVRWA for information about the new well, no information has been provided to PVRWA by EBB.

7. On or about February 6, 2025, PVRWA, through its counsel, served on EBB Interrogatories and Requests for Production of Documents Propounded by Petroleum Valley Regional Water Authority on East Brady Borough (hereinafter "First Set").

8. EBB responded in part to this discovery request on or about March 19, 2025.

9. In paragraph No. 3 of the First Set, PVRWA requested as follows: *"With reference to Request and Response No. 6 in the May 16, 2024, Response, because no engineering studies or reports, cost estimates and/or construction estimates exist, state exactly what documents were relied on by EBB to impose a surcharge on PVRWA."*

10. EBB responded: *"The Borough based its rates on historic usage from its customers, peak flow data, average daily flow data, its water allocation permit and its operating budget. Such data was produced in response to PVRWA's April 11, 2024, Right to Know Request. The current operating budget of the Borough will be supplemented."*

11. In the Supplemental Response ("Supplemental"), EBB responded with a profit and loss statement from January 2022-December 2024, attached as Exhibit "A".

12. In all of these documents, there is no mention of a new well.

13. Any information regarding a new well should have been produced and provided to PVRWA through its three (3) Sets of Interrogatories and Requests for Production of Documents, attached as Exhibit "B".

14. Additionally, EBB responded on May 16, 2024, to a Right to Know Request filed by PVRWA dated April 11, 2024: *"12. Copies of any permits, permit applications and grant applications that pertain to the new well proposed by EBB – No records exist"*. A copy of the aforesaid Request and Response is attached hereto as Exhibit "C".

15. To allow EBB to present information regarding a new well would be extremely prejudicial to PVRWA, given the failure to present said information in discovery.

WHEREFORE, showing these things, Complainant, Petroleum Valley Regional Water Authority, respectfully requests that no evidence regarding any new well can be presented by Respondent, East Brady Borough, or its witnesses.

Respectfully submitted,

GALLAGHER LAW GROUP

By: /s/ Michael D. Gallagher  
Michael D. Gallagher, Esquire  
PA I.D. No. 59237

Sean M. Gallagher, Esquire  
PA I.D. No. 318827

*Solicitors for Complainant,  
Petroleum Valley Regional  
Water Authority*

110 East Diamond Street  
Butler, PA 16001  
(724) 282-3141

EXHIBIT "A"

**East Brady Borough Water**  
**Profit & Loss**  
**January 2022 through December 2024**

Jan '22 - Dec 24

**Income**

130.08 · Due from Sewer Fund	4,176.10
341 · Interest Income	33,041.21
<b>378.000 · Water System Income</b>	
378.110 · Metered Sales to Residential	448,147.57
378.120 · Metered Sales to Commercial	
378.121 · Metered Sales to Bulk- Cap Imp	155,375.61
378.120 · Metered Sales to Commercial - Other	<u>1,096,253.78</u>
<b>Total 378.120 · Metered Sales to Commercial</b>	<b>1,251,629.39</b>
378.23 · Customer Deposits	6,900.00
378.24 · Water Tap Fee	<u>4,050.00</u>
<b>Total 378.000 · Water System Income</b>	<b>1,710,726.96</b>
395 · Refund of Prior Year Expend.	<u>800.00</u>
<b>Total Income</b>	<b>1,748,744.27</b>

**Expense**

402 · Auditing Services	6,975.00
404 · Legal Services	
404.310 · Solicitor Fees	15,940.00
404.353 · Licenses & Fees	<u>6,850.00</u>
<b>Total 404 · Legal Services</b>	<b>22,790.00</b>
405 · Office Expense	
405.210 · Supplies	1,213.36
405.213 · Computer/Copier Supplies	12,166.50
405.215 · Postage	2,311.76
405.383 · Office Rental	<u>10,800.00</u>
<b>Total 405 · Office Expense</b>	<b>26,491.62</b>
406.00 · Water System Administration	
406.100 · Refunded Deposits	<u>865.41</u>
<b>Total 406.00 · Water System Administration</b>	<b>865.41</b>
408 · Engineering	101,689.66
409.320 · Communication	
409.321 · Telephone	3,777.60
409.324 · Cellular Phones	<u>2,915.13</u>
<b>Total 409.320 · Communication</b>	<b>6,692.73</b>
409.360 · Utilities	
409.361 · Electricity	119,662.78
409.362 · Gas	<u>8,324.20</u>
<b>Total 409.360 · Utilities</b>	<b>127,986.98</b>
409.374 · Repair & Maintenance Supplies	
409.260 · Small Tools & Minor Equipment	30,695.67
409.370 · Repairs & Maintenance Services	3,436.98
409.384 · Rental- Machinery & Equip.	<u>270.60</u>
<b>Total 409.374 · Repair &amp; Maintenance Supplies</b>	<b>34,403.25</b>
410 · Police/Protection	
410.242 · Protection to Property	3,604.05

**East Brady Borough Water**  
**Profit & Loss**  
**January 2022 through December 2024**

	<u>Jan '22 - Dec 24</u>
410.450 · Contracted Police Coverage	72,073.27
Total 410 · Police/Protection	75,677.32
448.000 · Water System	
448.220 · Operating Supplies	
448.221 · Chemicals	100,546.66
448.231 · Vehicle Fuel	5,990.60
448.238 · Clothing & Uniforms	10,985.69
448.239 · Operating Parts	98,543.81
Total 448.220 · Operating Supplies	216,066.76
Total 448.000 · Water System	216,066.76
448.300 · Other Services	
448.310 · Professional Services	104,095.91
448.314 · Right to Know Request	20.75
448.316 · Services-Lab Fees	123,374.24
Total 448.300 · Other Services	227,490.90
448.390 · Bank Fees/Service Charges	10.00
448.420 · Dues, Subscriptions & Membershp	2,034.00
448.450 · Contracted Services- H2O ins	16,281.00
448.451 · Contracted Maint. Repairs	75,908.62
448.471 · Debt Principal- Water Loan Pmt	94,552.34
448.700 · Capital Purchases	
448.740 · Capital Improvements- Machinery	94,339.34
448.750 · System Improvements	414,788.30
Total 448.700 · Capital Purchases	509,127.64
481.484 · Employer Paid Benefits & Wth	
481.196 · Health Insurance	49,480.20
481.198 · Disability Insurance	864.79
Total 481.484 · Employer Paid Benefits & Wth	50,344.99
486.000 · Insurance, Casualty, & Surety	
486.351 · Property Insurance	17,994.69
Total 486.000 · Insurance, Casualty, & Surety	17,994.69
66000 · Payroll Expenses	153,796.40
Total Expense	1,767,179.31
Net Income	<u><u>-18,435.04</u></u>

EXHIBIT "B"

**COMMONWEALTH OF PENNSYLVANIA**  
**BEFORE THE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETROLEUM VALLEY  
REGIONAL WATER AUTHORITY

COMPLAINT DOCKET NO.:  
C-2024-3051609

Complainant,

v.

EAST BRADY BOROUGH,

Respondent.

**INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS PROPOUNED  
BY PETROLEUM VALLEY REGIONAL WATER  
AUTHORITY ON EAST BRADY BOROUGH**

Filed on Behalf of Complainant:

**PETROLEUM VALLEY REGIONAL  
WATER AUTHORITY**

Counsel of Record for this Party:

Michael D. Gallagher, Esquire  
PA ID No. 59237

Sean M. Gallagher, Esquire  
PA ID No. 318872

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**COMMONWEALTH OF PENNSYLVANIA**  
**BEFORE THE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETROLEUM VALLEY REGIONAL WATER AUTHORITY,	:	COMPLAINT DOCKET NO.:
	:	C-2024-3051609
Complainant,	:	
	:	
v.	:	
	:	
EAST BRADY BOROUGH,	:	
	:	
Respondent.	:	

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**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**PROPOUNDED BY PETROLEUM VALLEY REGIONAL WATER**  
**AUTHORITY ON EAST BRADY BOROUGH**

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Pursuant to 66 Pa. C.S. § 333 and 52 Pa. Code § 5.341 *et seq.*, Petroleum Valley Regional Water Authority (“PVRWA”) hereby propounds the following Interrogatories and Requests for Production of Documents on East Brady Borough (“EBB”).

**INSTRUCTIONS**

1. The “Responding Party,” “you,” or “your” means the party to which these interrogatories and requests for production of documents are propounded and/or all agents, affiliates, employees, consultants, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. “PVRWA” means Petroleum Valley Regional Water Authority.
4. “EBB” means East Brady Borough.

5. To "identify" a natural person means to state that person's full name, title or position, employer, last known address, and last known telephone number.

6. To "identify" a business entity means to state the full name of such business, the form of the business, and its location or address.

7. To "identify" a "document" means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

a. The title or other means of identification of each such document;

b. The date of each such document;

c. The author, preparer or signer of each such document; and

d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.). In lieu of "identifying" any document, it shall be deemed a sufficient compliance with these Interrogatories to attach a copy of each such document to the Answers hereto and reference said document to the particular Interrogatory to which the document is responsive.

8. "Document" means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however

stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

9. "Communication" means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

10. "Date" means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

11. "Person" refers to, without limiting the generality of its meaning, every natural person, corporation, partnership, association (whether formally organized or *ad hoc*), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency, or any other group or organization.

12. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

13. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

14. The answers provided should first restate the question asked and identify the person(s) supplying the information.

15. In answering these Interrogatories, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the Interrogatories cannot be

answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party's Answer is qualified in any particular, please set forth the details of such qualification.

16. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 9 and state the basis of the objection.

17. If the Responding Party objects to part of an Interrogatory and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that Interrogatory. If the Responding Party objects to the scope or time period of an Interrogatory and refuses to answer for that scope or time period, state the Responding Party's objection and answer the Interrogatory for the scope or time period that the Responding Party believes is appropriate.

18. If, in connection with an Interrogatory, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

19. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and, (c) the basis on which the privilege or other protection from disclosure is claimed.

20. These Interrogatories are continuing and the Responding Party is obliged to change, supplement and correct all Answers given to conform to new or changing information.

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
PROPOUNDED BY PETROLEUM VALLEY REGIONAL WATER  
AUTHORITY ON EAST BRADY BOROUGH**

**DOCKET NO. C-2024-3041609**

1. With reference to the May 16, 2024, Response of EBB to PVRWA's April 11, 2024, Right to Know Request:
  - a. Confirm that the document attached hereto as Exhibit "A" is a true and correct copy of the EBB Response (without attachments), dated May 16, 2024.
  - b. If you cannot confirm that the document attached hereto as Exhibit "A" is a true and correct copy of the EBB Response (without attachments), dated May 16, 2024, state the reason why you cannot make such a confirmation.
  - c. If you cannot confirm that the document attached hereto as Exhibit "A" is a true and correct copy of the EBB Response (without attachments), then attach a true and correct copy of the May 16, 2024, EBB Response and attachments to PVRWA's April 11, 2024, Right to Know Request.
2. With reference to Request and Answer No. 10 in the May 16, 2024, Response, state the reason why no Notice was sent to PVRWA advising it of a rate increase.
3. With reference to Request and Response No. 6 in the May 16, 2024, Response, because no engineering studies or reports, cost estimates and/or construction estimates exist, state exactly what documents were relied on by EBB to impose a surcharge on PVRWA.
4. Attach to your Answer and Response a copy of all documents identified in Answer to Interrogatory No. 3, above.
5. With reference to Request and Response No. 5 in the May 16, 2024, Response, state whether the EBB meeting Minutes requested for the period October 1, 2023 through April 9, 2024, are no longer available on-line. If they are not, attach a copy of the EBB meeting minutes for the period October 1, 2023, through April 9, 2024.

6. With reference to the EBB Response to PVRWA's August 26, 2024, Right to Know Request:

a. Confirm that included in Response No. 16 is a March 19, 2024, email from EBB's counsel to EBB attached hereto as Exhibit "B", is a true and correct copy of the March 19, 2024, email.

b. If you cannot confirm that the document attached hereto as Exhibit "B" is a true and correct copy of the March 19, 2024 email, state the reason why you cannot make such a confirmation.

c. If you cannot confirm that the document attached hereto as Exhibit "B" is a true and correct copy of the March 19, 2024 email, then attach a true and correct copy of the March 19, 2024 email attached in partial Response to PVRWA's August 26, 2024, Right to Know Request.

7. With respect to the March 19, 2024, email, identify all documents relied on in preparing the Resolution.

8. Attach to your Answer and Response a copy of all documents identified in Answer to Interrogatory No. 7, above.

9. With respect to Paragraph No. 9 of EBB's Answer to PVRWA's Complaint, set forth the basis that:

a. PVRWA is not working with DEP in the permitting process.

b. That Kaylor Mine No. 4 is a surface mine.

c. That Kaylor Mine No. 4 has insufficient flow for 6.6 million gallons.

10. Attach all documents relied upon in the Answer to Interrogatory No. 9, above.

11. With respect to paragraph No. 14 of EBB's Answer to PVRWA's Complaint, Identify all members of the "collective group" subject to the overage rate since April of 2024.

12. For each member of the “collective group” identified in the Answer to Interrogatory No. 11, above, set forth the amount of overage billed to each member from April of 2024, to the present.

13. Identify all members of the “not long-term bulk water customer” group subject to the overage rate since April of 2024.

14. For each member of the “no longer long-term bulk water customer” group identified In Answer to Interrogatory No. 13, above, set forth the amount of overage billed to each member from April of 2024, to the present.

15. Set forth the fee rate charged to bulk water customers prior to the April of 2024 rate increase.

16. Set forth the fee rate charged to PVRWA prior to the April of 2024 rate increase.

17. Set forth the fee rate for all EBB bulk water customers after the April of 2024 rate increase.

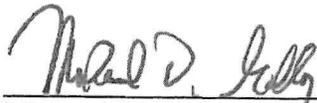
18. Set forth the fee rate for PVRWA after the April of 2024 rate increase.

19. Set forth the calculation based on “simple math” as referred to in Paragraph No. 15 of EBB’s Answer to PVRWA’s Complaint relied on before raising rates in April of 2024.

20. Identify all documents in which a calculation of "simple math" was provided to EBB's Council members prior to or at the time of the vote to raise water rates in April of 2024.

Respectfully submitted,

GALLAGHER LAW GROUP

By:   
Michael D. Gallagher, Esquire  
PA I.D. No. 59237

Sean M. Gallagher, Esquire  
PA I.D. No. 318827

*Solicitors for Complainant,  
Petroleum Valley Regional  
Water Authority*

110 East Diamond Street  
Butler, PA 16001  
(724) 282-3141

EXHIBIT "A"

## Gallagher Law Group

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**From:** ebboro@zoominternet.net  
**Sent:** Thursday, May 16, 2024 3:38 PM  
**To:** Gallagher Law Group  
**Cc:** 'Amy Schrempf'  
**Subject:** Right to Know response  
**Attachments:** 2021 Subfacility Report.pdf; 2022 Subfacility Reports.pdf; 2023 Subfacility Reports.pdf; Average Water use 2021 2022 & 2023.xlsx; Min & Max water 2021-2023.pdf; Rimersburg bulk water agreement.pdf; Water Allocation permit.pdf; FOR IMMEDIATE RELEASE.docx; Andrews Price invoices 1-1-23 to 3-31-24.pdf

Here is the information you requested in a Right to Know Request dated April 11, 2024.

1. Chapter 110 sub facilities report for years 2021 through 2023 pertaining to Rimersburg.  
See attached.
2. Records pertaining to peak flow and average daily flows for the years 2021 through 2023.  
See attached.
3. Copy of intermunicipal agreement between East Brady and Rimersburg.  
See attached.
4. Copy of EBB's most recent allocation permit.  
See attached.
5. Minutes of East Brady Borough for the period October 1, 2023 to April 9, 2024  
Our meeting minutes can be found on our website: [www.eastbradyborough.com](http://www.eastbradyborough.com)
6. Copies of all documents, including without limitation, engineering studies or reports, cost estimates and or construction estimates upon which East Brady imposed a Surcharge on PVRWA.  
No records exist.
7. Copy of press release issued by the Borough pertaining to its April 2, 2024 Council meeting.  
See attached.
8. Copies of all correspondence, including electronic, between Senate Engineering/LSSE and East Brady Borough or any of its elected or appointed officials for the period November 1, 2023 to April 9, 2024.  
This request is denied due to being too voluminous. If you reduce your scope to a specific subject it may be reconsidered.
9. Copies of all Notices sent to PVRWA advising it of a rate increase.  
No records exist.
10. Copies of all invoices submitted to East Brady Borough by the law firm of Andrews & Price, LLC for the period January 1, 2023 to March 31, 2024.  
See attached.
11. Copies of all emails by and between the members of the East Brady Borough Council pertaining to the increase in rates for the period October 1, 2023 and April 9, 2024.  
No records exist.
12. Copies of any permits, permit applications and grant applications that pertain to the new well proposed by EBB.  
No records exist.

This fulfills the Right to Know Request.

Sincerely,  
Susan Buechele

EXHIBIT "B"

# RESPONSE TO REQUEST #16

**Natalie Simonetti**

---

**From:** Amy Schrempf  
**Sent:** Tuesday, March 19, 2024 2:34 PM  
**To:** Rick Barnett; Larry Lennon Jr.; ebboro@zoominternet.net  
**Subject:** Drafts  
**Attachments:** Rate Increase Resolution.docx; FOR IMMEDIATE RELEASE.docx

Good afternoon.

Here is a draft resolution for tonight's meeting and a draft press release.

I'd suggest the language for the motion reads: "Motion to approve a rate structure, setting a rate of \$3.95 per thousand gallons for water used up to 144,000 gallons, as allocated to the Borough users and its contract bulk customers respectively, and setting an overage/surplus/surcharge rate of \$7.15 per thousand gallons used over that allocation or for any other purpose."

Let me know your thoughts!

Thanks.

Amy

Amy R. Schrempf

ANDREWS & PRICE LLC

1500 Ardmore Boulevard, Suite 506

Pittsburgh, PA 15221

phone: 412-243-9700

fax: 412-243-9660

aschrempf@andrewsandprice.com <mailto:aschrempf@andrewsandprice.com>

COMMONWEALTH OF PENNSYLVANIA

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETROLEUM VALLEY : COMPLAINT DOCKET NO.:  
REGIONAL WATER AUTHORITY, : C-2024-3051609  
:  
Complainant, :  
:  
v. :  
:  
EAST BRADY BOROUGH, :  
:  
Respondent. :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the following persons, in the manner indicated below on February 6, 2025:

Amy R. Schrempf, Esquire  
Solicitor for East Brady Borough  
Andrews & Price LLC  
1500 Ardmore Boulevard, Suite 506  
Pittsburgh, PA 15221  
(Via email [aschrempf@andrewsandprice.com](mailto:aschrempf@andrewsandprice.com)  
and Regular Mail)

Paul Diskin, Director  
Pennsylvania Public Utility Commission  
Bureau of Technical Utility Services  
Commonwealth Keystone Building  
400 North Street, 3<sup>rd</sup> Floor West  
Harrisburg, PA 17120  
(Via email [pdiskin@pa.gov](mailto:pdiskin@pa.gov) and Regular Mail)

Steven C. Gray,  
Sr. Supervising Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101  
(Via email [sgray@pa.gov](mailto:sgray@pa.gov) and Regular Mail)

Allison Kaster, Director  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
Harrisburg, PA 17120  
(Via email [akaster@pa.gov](mailto:akaster@pa.gov) and Regular Mail)

Christine M. Hoover,  
Sr. Asst. Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
(Via email [choover@paoca.org](mailto:choover@paoca.org) and Regular Mail)

  
\_\_\_\_\_  
Michael D. Gallagher, Esquire  
Sean M. Gallagher, Esquire

**COMMONWEALTH OF PENNSYLVANIA**  
**BEFORE THE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETROLEUM VALLEY  
REGIONAL WATER AUTHORITY

COMPLAINT DOCKET NO.:  
C-2024-3051609

Complainant,

v.

EAST BRADY BOROUGH,

Respondent.

**SECOND SET OF INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS PROPOUNED BY PETROLEUM  
VALLEY REGIONAL WATER AUTHORITY ON  
EAST BRADY BOROUGH**

Filed on Behalf of Complainant:

**PETROLEUM VALLEY REGIONAL  
WATER AUTHORITY**

Counsel of Record for this Party:

Michael D. Gallagher, Esquire  
PA ID No. 59237

Sean M. Gallagher, Esquire  
PA ID No. 318872

GALLAGHER LAW GROUP  
110 East Diamond Street  
Butler, PA 16001-5999  
(724) 282-3141

COMMONWEALTH OF PENNSYLVANIA

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETROLEUM VALLEY	:	COMPLAINT DOCKET NO.:
REGIONAL WATER AUTHORITY,	:	C-2024-3051609
	:	
Complainant,	:	
	:	
v.	:	
	:	
EAST BRADY BOROUGH,	:	
	:	
Respondent.	:	

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**SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY PETROLEUM VALLEY REGIONAL WATER AUTHORITY ON EAST BRADY BOROUGH**

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Pursuant to 66 Pa. C.S. § 333 and 52 Pa. Code § 5.341 *et seq.*, Petroleum Valley Regional Water Authority (“PVRWA”) hereby propounds the following Second Set of Interrogatories and Requests for Production of Documents on East Brady Borough (“EBB”).

**INSTRUCTIONS**

1. The “Responding Party,” “you,” or “your” means the party to which this Second Set of Interrogatories and Requests for Production of Documents is propounded and/or all agents, affiliates, employees, consultants, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. “PVRWA” means Petroleum Valley Regional Water Authority.
4. “EBB” means East Brady Borough.

5. To "identify" a natural person means to state that person's full name, title or position, employer, last known address, and last known telephone number.

6. To "identify" a business entity means to state the full name of such business, the form of the business, and its location or address.

7. To "identify" a "document" means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and

d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.). In lieu of "identifying" any document, it shall be deemed a sufficient compliance with these Interrogatories to attach a copy of each such document to the Answers hereto and reference said document to the particular Interrogatory to which the document is responsive.

8. "Document" means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however

stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

9. "Communication" means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

10. "Date" means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

11. "Person" refers to, without limiting the generality of its meaning, every natural person, corporation, partnership, association (whether formally organized or *ad hoc*), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency, or any other group or organization.

12. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

13. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

14. The answers provided should first restate the question asked and identify the person(s) supplying the information.

15. In answering these Interrogatories, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the Interrogatories cannot be

answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party's Answer is qualified in any particular, please set forth the details of such qualification.

16. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 9 and state the basis of the objection.

17. If the Responding Party objects to part of an Interrogatory and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that Interrogatory. If the Responding Party objects to the scope or time period of an Interrogatory and refuses to answer for that scope or time period, state the Responding Party's objection and answer the Interrogatory for the scope or time period that the Responding Party believes is appropriate.

18. If, in connection with an Interrogatory, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

19. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and, (c) the basis on which the privilege or other protection from disclosure is claimed.

20. These Interrogatories are continuing and the Responding Party is obliged to change, supplement and correct all Answers given to conform to new or changing information.

**SECOND SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS PROPOUNDED BY PETROLEUM VALLEY REGIONAL WATER  
AUTHORITY ON EAST BRADY BOROUGH**

**DOCKET NO. C-2024-3041609**

1. In paragraph 19 of your Answers to Interrogatories and Request for Production of Documents, you state, in part:

“The Borough has three (3) wells. DEP requires the Borough to meet the demand based on the largest well being out of service.”

Produce all documents in your possession, including documents from DEP which state that “DEP requires the Borough to meet the demand based on the largest well being out of service.”

Respectfully submitted,

GALLAGHER LAW GROUP

By:



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Michael D. Gallagher, Esquire  
PA I.D. No. 59237

Sean M. Gallagher, Esquire  
PA I.D. No. 318827

*Solicitors for Complainant,  
Petroleum Valley Regional  
Water Authority*

110 East Diamond Street  
Butler, PA 16001  
(724) 282-3141



**COMMONWEALTH OF PENNSYLVANIA**  
**BEFORE THE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETROLEUM VALLEY  
REGIONAL WATER AUTHORITY

COMPLAINT DOCKET NO.:  
C-2024-3051609

Complainant,

v.

EAST BRADY BOROUGH,

Respondent.

**THIRD SET OF INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS PROPOUNED BY PETROLEUM  
VALLEY REGIONAL WATER AUTHORITY ON  
EAST BRADY BOROUGH**

Filed on Behalf of Complainant:

**PETROLEUM VALLEY REGIONAL  
WATER AUTHORITY**

Counsel of Record for this Party:

Michael D. Gallagher, Esquire  
PA ID No. 59237

Sean M. Gallagher, Esquire  
PA ID No. 318872

GALLAGHER LAW GROUP  
110 East Diamond Street  
Butler, PA 16001-5999  
(724) 282-3141

COMMONWEALTH OF PENNSYLVANIA

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETROLEUM VALLEY	:	COMPLAINT DOCKET NO.:
REGIONAL WATER AUTHORITY,	:	C-2024-3051609
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Complainant,	:	
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v.	:	
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EAST BRADY BOROUGH,	:	
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Respondent.	:	

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**THIRD SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY PETROLEUM VALLEY REGIONAL WATER AUTHORITY ON EAST BRADY BOROUGH**

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Pursuant to 66 Pa. C.S. § 333 and 52 Pa. Code § 5.341 *et seq.*, Petroleum Valley Regional Water Authority (“PVRWA”) hereby propounds the following Third Set of Interrogatories and Requests for Production of Documents on East Brady Borough (“EBB”).

**INSTRUCTIONS**

1. The “Responding Party,” “you,” or “your” means the party to which this Third Set of Interrogatories and Requests for Production of Documents is propounded and/or all agents, affiliates, employees, consultants, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. “PVRWA” means Petroleum Valley Regional Water Authority.
4. “EBB” means East Brady Borough.

5. To "identify" a natural person means to state that person's full name, title or position, employer, last known address, and last known telephone number.

6. To "identify" a business entity means to state the full name of such business, the form of the business, and its location or address.

7. To "identify" a "document" means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

a. The title or other means of identification of each such document;

b. The date of each such document;

c. The author, preparer or signer of each such document; and

d. A description of the subject matter of such document sufficient to permit an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.). In lieu of "identifying" any document, it shall be deemed a sufficient compliance with these Interrogatories to attach a copy of each such document to the Answers hereto and reference said document to the particular Interrogatory to which the document is responsive.

8. "Document" means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting, study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however

stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

9. "Communication" means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

10. "Date" means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

11. "Person" refers to, without limiting the generality of its meaning, every natural person, corporation, partnership, association (whether formally organized or *ad hoc*), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency, or any other group or organization.

12. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

13. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

14. The answers provided should first restate the question asked and identify the person(s) supplying the information.

15. In answering these Interrogatories, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the Interrogatories cannot be

answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party's Answer is qualified in any particular, please set forth the details of such qualification.

16. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Instruction 9 and state the basis of the objection.

17. If the Responding Party objects to part of an Interrogatory and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that Interrogatory. If the Responding Party objects to the scope or time period of an Interrogatory and refuses to answer for that scope or time period, state the Responding Party's objection and answer the Interrogatory for the scope or time period that the Responding Party believes is appropriate.

18. If, in connection with an Interrogatory, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the so-called "attorneys' work product doctrine," or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

19. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and, (c) the basis on which the privilege or other protection from disclosure is claimed.

20. These Interrogatories are continuing and the Responding Party is obliged to change, supplement and correct all Answers given to conform to new or changing information.

**THIRD SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF  
DOCUMENTS PROPOUNDED BY PETROLEUM VALLEY REGIONAL WATER  
AUTHORITY ON EAST BRADY BOROUGH**

**DOCKET NO. C-2024-3041609**

1. State whether LSSE or any other person or entity has been retained by EBB since April 22, 2024, to undertake a rate study or other analysis of the rates charged by EBB for the sale of water to any of its customers, including without limitation, the same of water to PVRWA.

2. If the Answer to Interrogatory No. 1, above, is anything but "no," state whether the rate study or other analysis of the rates charged by EBB for the sale of water to any of its customers, including without limitation, PVRWA, has been completed.

(a) If so, attach a copy of the rate study or other analysis to your Answers.

(b) If not completed, that the anticipated date of completion.

(c) Produce copies of all documents relied on by LSSE or any other person or entity in preparing the water rate study or other analysis of the rates charged by EBB for the sale of water to any of its customers, including without limitation, PVRWA.

3. Identify copies of all documents EBB intends to utilize at hearing, in support of its April 22, 2024, rate increase.

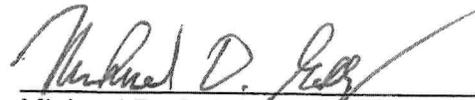
4. Produce all documents identified in Answer to Interrogatory No. 3, above.

5. If not already identified above, produce all documents EBB intends to utilize at hearing, in support of any rate increase sought from the PUC.

Respectfully submitted,

GALLAGHER LAW GROUP

By:



Michael D. Gallagher, Esquire  
PA I.D. No. 59237

Sean M. Gallagher, Esquire  
PA I.D. No. 318827

*Solicitors for Complainant,  
Petroleum Valley Regional  
Water Authority*

110 East Diamond Street  
Butler, PA 16001  
(724) 282-3141

COMMONWEALTH OF PENNSYLVANIA

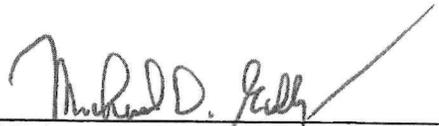
BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETROLEUM VALLEY	:	COMPLAINT DOCKET NO.:
REGIONAL WATER AUTHORITY,	:	C-2024-3051609
	:	
Complainant,	:	
	:	
v.	:	
	:	
EAST BRADY BOROUGH,	:	
	:	
Respondent.	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the following persons, in the manner indicated below on May 29, 2025:

Amy R. Schrempf, Esquire  
Solicitor for East Brady Borough  
Andrews & Price LLC  
1500 Ardmore Boulevard, Suite 506  
Pittsburgh, PA 15221  
*(Via email [aschrempf@andrewsandprice.com](mailto:aschrempf@andrewsandprice.com)  
and Regular Mail)*



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Michael D. Gallagher, Esquire  
Sean M. Gallagher, Esquire

EXHIBIT "C"

## Gallagher Law Group

---

**From:** Gallagher Law Group  
**Sent:** Thursday, April 11, 2024 12:33 PM  
**To:** ebboro@zoominternet.net  
**Cc:** Sean Gallagher  
**Subject:** Right-to-Know Request  
**Attachments:** RtK to EBB 04 11 2024.pdf

Dear Right-to-Know Officer:

Please see the attached Right-to-Know Request Form on behalf of Attorney Michael Gallagher.

Thanks,

Mary for Mike Gallagher



110 East Diamond Street, Suite 101  
Butler, PA 16001  
[attys@gallagher.legal](mailto:attys@gallagher.legal)  
724-282-3141



pennsylvania

OFFICE OF OPEN RECORDS

### Standard Right-to-Know Law Request Form

Good communication is vital in the RTKL process. Complete this form thoroughly and retain a copy; it may be required if an appeal is filed. You have 15 business days to appeal after a request is denied or deemed denied.

SUBMITTED TO AGENCY NAME: East Brady Borough (Attn: AORO)

Date of Request: April 11, 2024 Submitted via:  Email  U.S. Mail  Fax  In Person

**PERSON MAKING REQUEST:**

Name: Michael D. Gallagher, Esquire Company (if applicable): Gallagher Law Group

Mailing Address: 110 East Diamond Street, Suite 101

City: Butler State: PA Zip: 16001 Email: attys@gallagher.legal

Telephone: 724-282-3141 Fax: 724-282-7378

How do you prefer to be contacted if the agency has questions?  Telephone  Email  U.S. Mail

**RECORDS REQUESTED:** *Be clear and concise. Provide as much specific detail as possible, ideally including subject matter, time frame, and type of record or party names. RTKL requests should seek records, not ask questions. Requesters are not required to explain why the records are sought or the intended use of the records unless otherwise required by law. Use additional pages if necessary.*

See attached page

- DO YOU WANT COPIES?**  Yes, printed copies (default if none are checked)  
 Yes, electronic copies preferred if available  
 No, in-person inspection of records preferred (may request copies later)

Do you want certified copies?  Yes (may be subject to additional costs)  No

RTKL requests may require payment or prepayment of fees. See the Official RTKL Fee Schedule for more details.

Please notify me if fees associated with this request will be more than  \$100 (or)  \$\_\_\_\_\_.

**ITEMS BELOW THIS LINE FOR AGENCY USE ONLY**

Tracking: \_\_\_\_\_ Date Received: \_\_\_\_\_ Response Due (5 bus. days): \_\_\_\_\_

30-Day Ext.?  Yes  No (If Yes, Final Due Date: \_\_\_\_\_) Actual Response Date: \_\_\_\_\_

Request was:  Granted  Partially Granted & Denied  Denied Cost to Requester: \$\_\_\_\_\_

Appropriate third parties notified and given an opportunity to object to the release of requested records.

NOTE: In most cases, a completed RTKL request form is a public record. More information about the RTKL is available at <https://www.openrecords.pa.gov>

## ATTACHMENT TO OPEN RECORDS REQUEST

1. Chapter 110 sub facilities report for years 2021 through 2023 pertaining to Rimersburg.
2. Records pertaining to peak flow and average daily flows for the years 2021 through 2023.
3. Copy of intermunicipal agreement between East Brady Borough (EBB) and Rimersburg.
4. Copy of EBB's most recent allocation study or permit.
5. Minutes of East Brady Borough and/or East Brady Water & Sewer Authority for the period October 1, 2023, to April 9, 2024.
6. Copies of all documents, including without limitation, engineering studies or reports, cost estimates and/or construction estimates upon which East Brady Borough imposed a surcharge on Petroleum Valley Regional Water Authority.
7. Copy of the Press Release issued by the Borough pertaining to its April 2, 2024, Council meeting.
8. Copies of all correspondence, including electronic, between Senate Engineering/LSSE and East Brady Borough or any of its elected or appointed officials for the period November 1, 2023, to April 9, 2024.
9. Copies of all Notices sent to Petroleum Valley Regional Water Authority advising it of a rate increase.
10. Copies of all invoices submitted to East Brady Borough by the law firm of Andrews & Price, LLC for the period January 1, 2023, to March 31, 2024.
11. Copies of all emails by and between the Members of East Brady Borough Council or East Brady Water & Sewer Authority pertaining to the increase in rates for the period October 1, 2023, to April 9, 2024.
12. Copies of any permits, permit applications and grant applications that pertain to the new well proposed by EBB.

## Mike Gallagher

---

**From:** ebboro@zoominternet.net  
**Sent:** Thursday, May 16, 2024 3:38 PM  
**To:** Gallagher Law Group  
**Cc:** 'Amy Schrempf'  
**Subject:** Right to Know response  
**Attachments:** 2021 Subfacility Report.pdf; 2022 Subfacility Reports.pdf; 2023 Subfacility Reports.pdf; Average Water use 2021 2022 & 2023.xlsx; Min & Max water 2021-2023.pdf; Rimersburg bulk water agreement.pdf; Water Allocation permit.pdf; FOR IMMEDIATE RELEASE.docx; Andrews Price invoices 1-1-23 to 3-31-24.pdf

Here is the information you requested in a Right to Know Request dated April 11, 2024.

1. Chapter 110 sub facilities report for years 2021 through 2023 pertaining to Rimersburg.  
See attached.
2. Records pertaining to peak flow and average daily flows for the years 2021 through 2023.  
See attached.
3. Copy of intermunicipal agreement between East Brady and Rimersburg.  
See attached.
4. Copy of EBB's most recent allocation permit.  
See attached.
5. Minutes of East Brady Borough for the period October 1, 2023 to April 9, 2024  
Our meeting minutes can be found on our website: [www.eastbradyborough.com](http://www.eastbradyborough.com)
6. Copies of all documents, including without limitation, engineering studies or reports, cost estimates and or construction estimates upon which East Brady imposed a Surcharge on PVRWA.  
No records exist.
7. Copy of press release issued by the Borough pertaining to its April 2, 2024 Council meeting.  
See attached.
8. Copies of all correspondence, including electronic, between Senate Engineering/LSSE and East Brady Borough or any of its elected or appointed officials for the period November 1, 2023 to April 9, 2024.  
This request is denied due to being too voluminous. If you reduce your scope to a specific subject it may be reconsidered.
9. Copies of all Notices sent to PVRWA advising it of a rate increase.  
No records exist.
10. Copies of all invoices submitted to East Brady Borough by the law firm of Andrews & Price, LLC for the period January 1, 2023 to March 31, 2024.  
See attached.
11. Copies of all emails by and between the members of the East Brady Borough Council pertaining to the increase in rates for the period October 1, 2023 and April 9, 2024.  
No records exist.
12. Copies of any permits, permit applications and grant applications that pertain to the new well proposed by EBB.  
No records exist.

This fulfills the Right to Know Request.

Sincerely,  
Susan Buechele

**Susan D. Buechele**

East Brady Borough

Secretary-Treasurer

(724) 526-5531 Home

(724) 954-7080 Mobile

(724) 526-3504 Fax

ebboro@zoominternet.net

502 Ferry Street, Suite 15

East Brady, PA 16026

COMMONWEALTH OF PENNSYLVANIA

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETROLEUM VALLEY	:	COMPLAINT DOCKET NO.:
REGIONAL WATER AUTHORITY,	:	C-2024-3051609
	:	
Complainant,	:	
	:	
v.	:	
	:	
EAST BRADY BOROUGH,	:	
	:	
Respondent.	:	

**ORDER**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2025, upon presentation of Complainant's Petroleum Valley Regional Water Authority's Motion in Limine to Preclude Evidence Regarding Any New Well, said Motion is GRANTED. It is hereby Ordered that no evidence regarding any new well can be presented by Respondent, East Brady Borough, or its witnesses.

\_\_\_\_\_  
Jeffrey A. Watson,  
Administrative Law Judge

COMMONWEALTH OF PENNSYLVANIA

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETROLEUM VALLEY	:	COMPLAINT DOCKET NO.:
REGIONAL WATER AUTHORITY,	:	C-2024-3051609
	:	
Complainant,	:	
	:	
v.	:	
	:	
EAST BRADY BOROUGH,	:	
	:	
Respondent.	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the following persons, in the manner indicated below on November 6, 2025:

Amy R. Schrempf, Esquire  
Solicitor for East Brady Borough  
Andrews & Price LLC  
1500 Ardmore Boulevard, Suite 506  
Pittsburgh, PA 15221  
*(Via email [aschrempf@andrewsandprice.com](mailto:aschrempf@andrewsandprice.com)  
and Regular Mail)*

*/s/ Michael D. Gallagher*  
Michael D. Gallagher, Esquire  
Sean M. Gallagher, Esquire