

# BEARD LAW COMPANY

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**RODNEY A. BEARD**  
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November 21, 2025

*VIA E-FILING*

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

Re: I&E Petition to Request that Commission Open a Section 529 Investigation into the  
Acquisition of Rock Spring Water Company/Docket No. P-2024-3051313

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utilities Commission is a Petition for  
Payment of Counsel Fees. A copy of this filing is being served in accordance with the attached  
Certificate of Service.

If you have any questions, please do not hesitate to contact me. Thank you.

Very truly yours,



Rodney A. Beard

RAB/nld

Enclosure

c: Rock Spring Water Company

All parties on the attached Certificate of Service in the manner specified.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
Bureau of Investigation & Enforcement : P-2024-3051313  
Petition to Request the Commission Open :  
A Section 529 Investigation into the :  
Acquisition of Rock Spring Water Company :

**PETITION FOR PAYMENT OF COUNSEL FEES**

AND NOW, comes Rodney A. Beard, Petitioner, and files the within Petition for Payment of Counsel Fees, and in support thereof avers as follows:

1. The Commission appointed Pennsylvania American Water Company as Receiver for Rock Spring Water Company pursuant to the Order dated March 21, 2025, entered in this matter.
2. Following a status conference held by the parties with Administrative Law Judge John Coogan on or about July 23, 2025, Rodney A. Beard entered his appearance in this matter on behalf of Rock Spring Water Company.
3. 52 Pa. Code § 1.21 requires that non-individual parties must be represented by an attorney to participate in the formal hearing process.
4. Pennsylvania American Water Company, as Receiver, has refused to pay counsel fees to Rodney A. Beard.
5. PAWC is claiming that Rodney A. Beard represents individual shareholders in this matter.
6. Rodney A. Beard does not represent individual shareholders in this matter. The individual shareholders would be entitled to represent themselves.

7. Rodney A. Beard is representing Rock Spring Water Company as a corporate entity in this matter.

8. Rock Spring Water Company, under receivership, continues to receive customer payments for water service and pay bills on behalf of the corporation as incurred.

9. The counsel fees incurred by the corporation for representation by Rodney A. Beard are incurred in the normal course.

10. Rock Spring Water Company currently owes Rodney A. Beard a total sum of \$16,257.50 through October 31, 2025, for representation in this matter.

11. It is inappropriate for the Receiver to refuse to pay counsel fees to Rodney A. Beard that were incurred for representation of the corporate entity.

WHEREFORE, it is respectfully requested that the Commission issue an Order to Pennsylvania American Water Company, as Receiver, to pay the counsel fees owed by Rock Spring Water Company to Rodney A. Beard.

Respectfully submitted:

11-21-25  
Date

  
\_\_\_\_\_  
Rodney A. Beard, Esquire  
PA I.D. No. 49909  
220 Regent Court, Suite A  
State College, PA 16801  
(814) 548-0028

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
Bureau of Investigation & Enforcement : P-2024-3051313  
Petition to Request the Commission Open :  
A Section 529 Investigation into the :  
Acquisition of Rock Spring Water Company :

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving Petition for Payment of Counsel fees dated November 21, 2025, upon the persons, in the manner and upon the persons listed below, which service satisfies the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**Served Via Electronic Mail Only**

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