



**Elizabeth Rose Triscari**  
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December 5 2025

**VIA ELECTRONIC FILING**

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

**RE: Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Petition to Request the Commission Open a Section 529 Investigation Into the Acquisition of Rock Spring Water Company Docket No. P-2024-3051313**

Dear Secretary Homsher:

Enclosed you will find for filing Pennsylvania American Water Company's Answer and New Matter to Beard Law Company's Petition for Payment of Counsel Fees in the above-captioned proceeding. Copies of this Answer and New Matter have been served to all parties on the Certificate of Service.

Please contact me if you have any questions about this filing.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Rose Triscari".

Elizabeth Rose Triscari

cc: The Honorable Administrative Law Judge John M. Coogan (*via electronic mail*)  
All Parties on the Attached Certificate of Service (*via electronic mail*)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :  
 Bureau of Investigation and Enforcement :  
 Petition to Request the Commission Open : Docket No. P-2024-3051313  
 A Section 529 Investigation into the :  
 Acquisition of Rock Spring Water Company :

**CERTIFICATE OF SERVICE**

I hereby certify that on this day I am serving the above-referenced **Answer and New Matter** upon people and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

**SERVED VIA ELECTRONIC MAIL ON DECEMBER 5, 2025**

Robert A. Mix, Esquire Robert Mix Law 211 Kimport Avenue Boalsburg, PA 16827 E-mail: <a href="mailto:Bmix470@gmail.com">Bmix470@gmail.com</a> Counsel for State College Borough Water Authority	Melanie Joy El Atieh, Esquire Jacob D. Guthrie, Esquire Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 Email: <a href="mailto:OCARockSpring@paoca.org">OCARockSpring@paoca.org</a> Counsel for the Office of Consumer Advocate
Amanda Chaplin, Esquire Glenn Masser, Esquire Pennsylvania Department of Environmental Protection Northcentral Regional Office 208 West Third Street, Suite 101 Williamsport, PA 17701 E-mail: <a href="mailto:achaplin@pa.gov">achaplin@pa.gov</a> E-mail: <a href="mailto:gmasser@pa.gov">gmasser@pa.gov</a> Counsel for the Pennsylvania Department of Environmental Protection	Elizabeth A. Dupuis, Esquire Morgan M. Madden, Esquire Babst, Calland, Clements & Zomnir, P.C. 330 Innovation Blvd., Suite 302 State College, PA 16803 Email: <a href="mailto:bdupuis@babstcalland.com">bdupuis@babstcalland.com</a> E-mail: <a href="mailto:mmaden@babstcalland.com">mmaden@babstcalland.com</a> Counsel for Ferguson Township
Carrie B. Wright, Esquire Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 E-mail: <a href="mailto:carwright@pa.gov">carwright@pa.gov</a> Counsel for the Bureau of Investigation and Enforcement	Rebecca Lyttle, Esquire Steven Gray, Esquire Office of Small Business Advocate 555 Walnut Street 1 <sup>st</sup> Floor, Forum Place Harrisburg, PA 17101 E-mail: <a href="mailto:relyttle@pa.gov">relyttle@pa.gov</a> E-mail: <a href="mailto:sgray@pa.gov">sgray@pa.gov</a> Counsel for Office of Small Business Advocate

<p>Alexander R. Stahl, Esquire  Aqua Pennsylvania, Inc.  762 W. Lancaster Avenue  Bryn Mawr, PA 19010  E-mail: <a href="mailto:astahl@aquaamerica.com">astahl@aquaamerica.com</a>  Counsel for Aqua Pennsylvania, Inc.</p>	<p>Rod Beard, Esquire  Beard Law Company  101 N. Allegheny Street  Bellefonte, PA 16823  E-mail: <a href="mailto:rod@beardlawco.com">rod@beardlawco.com</a>  Counsel for Rock Spring Water Company</p>
<p>David S. Gaines, Jr.  MILLER, KISTLER &amp; CAMPBELL  720 South Atherton Street, Suite 201  State College, PA 16801  E-Mail <a href="mailto:dgaines@mkclaw.com">dgaines@mkclaw.com</a>  Counsel for State College Borough Water Authority</p>	<p>David P. Zambito, Esquire  Jonathan P. Nase, Esquire  Cozen O'Connor  17 North Second Street, Suite 1410  Harrisburg, PA 17101  Phone: (717) 703-5892  E-mail: <a href="mailto:dzambito@cozen.com">dzambito@cozen.com</a>  E-mail: <a href="mailto:jnase@cozen.com">jnase@cozen.com</a></p>

Respectfully submitted,




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Elizabeth Rose Triscari, Esquire (PA ID #306921)  
Teresa K. Harrold, Esquire (PA ID #311082)  
Erin K. Fure, Esq. (PA ID No. 312245)  
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**Counsel for Pennsylvania-American Water Company**

Date: December 5, 2025

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
Petition to Request the Commission Open	:	Docket No. P-2024-3051313
A Section 529 Investigation into the	:	
Acquisition of Rock Spring Water Company	:	

**NOTICE TO PLEAD**

Pursuant to 52 Pa. Code § 5.63, you are hereby notified that you have twenty (20) days from the service of the enclosed Answer and New Matter of Pennsylvania-American Water Company (“PAWC”) to file a Reply to the New Matter. All pleadings, such as a Reply, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served to counsel for PAWC, and where applicable the Administrative Law Judge presiding over the case.

**File with:**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**With a copy to:**

Elizabeth Rose Triscari, Esq. (PA ID #306921)  
Teresa K. Harrold, Esq (PA ID #311082)  
Erin K. Fure, Esq. (PA ID # 312245)  
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Date: December 5, 2025

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Elizabeth Rose Triscari, Esquire  
Counsel for *Pennsylvania-American Water Company*

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
Petition to Request the Commission Open	:	Docket No. P-2024-3051313
A Section 529 Investigation into the	:	
Acquisition of Rock Spring Water Company	:	

**PENNSYLVANIA-AMERICAN WATER COMPANY’S ANSWER AND NEW MATTER  
TO THE PETITION FOR PAYMENT OF COUNSEL FEES**

AND NOW COMES PENNSYLVANIA-AMERICAN WATER COMPANY (“PAWC”), to file this Answer and New Matter to the Petition for Payment of Counsel Fees (the “Counsel Fees Petition”) filed by Rodney A. Beard, Esq. on behalf of Beard Law Company (“Beard Law”) November 21, 2025. For the reasons set forth below, PAWC respectfully requests that the Honorable Administrative Law Judge John M. Coogan (the “ALJ”) recommend that the Pennsylvania Public Utility Commission (“Commission”) deny the Counsel Fees Petition because PAWC, as Receiver for Rock Spring Water Company (“RSWC”), does not have sufficient funds on hand from RSWC to pay both (a) the expenses to ensure the provision of reasonable and adequate service to RSWC’s customers plus (b) the other expenses of RSWC, such as RSWC’s litigation expenses. Considering the present shortfall, PAWC as Receiver of RSWC should prioritize ensuring the provision of reasonable and adequate service to RSWC’s customers. PAWC should pay the other expenses of RSWC (including its litigation expenses) if and when the Receiver has sufficient funds on hand from RSWC to pay both (a) the expenses to ensure the provision of reasonable and adequate service to RSWC’s customers plus (b) the other expenses of RSWC.

**ANSWER**

1. Admitted. The Commission’s Order entered March 21, 2025 will be referred to herein as the “March 2025 Order.”

2. Admitted.

3. Denied. 52 Pa. Code § 1.21 is a written document that speaks for itself.

4. Admitted in part, denied in part. To date, the Receiver has received eight invoices from Beard Law totaling \$42,236.05.<sup>1</sup> **Exhibit A.** Some of these invoices have been paid; others have not, as shown in the following table:

<b>Invoice Number(s)</b>	<b>Amount of Invoice</b>	<b>Status of Invoice</b>
23977	\$2,025.00	Paid
23117	\$3,707.50	Paid
23167	\$775.00	Paid
23222	\$2,880.00	Paid
23237	\$7,955.00	Unpaid
23279	\$5,910.00	Unpaid
23324	\$10,347.50	Unpaid
23317	\$8,636.05	Unpaid

5. Admitted in part, denied in part. PAWC initially believed that Beard Law represented individual shareholders in this matter. PAWC withdraws this objection to paying the invoices from Beard Law. However, PAWC has additional reasons for refusing to pay the outstanding invoices at this time. These reasons are discussed in detail in New Matter, *infra*.

6. On information and belief, it is admitted that Beard Law does not represent individual shareholders in this matter. *See* answer to ¶ 7 below. The remainder of this paragraph is a statement of law to which no response is necessary.

7. Admitted, based on information and belief.

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<sup>1</sup> PAWC did not control RSWC’s finances until May 2, 2025, when a new checking account was created for RSWC at Citizens Bank. In April, 2025, RSWC paid an invoice from Beard Law for \$4,047.18.

8. It is admitted that PAWC, as Receiver for RSWC, collects amounts paid by RSWC's customers for water service provided by RSWC. March 2025 Order, Appendix A ¶ 1.i.

9. Admitted.

10. It is admitted that PAWC, as Receiver for RSWC, has not yet paid certain invoices from Beard Law. *See* Paragraph 4, *supra*, and New Matter, *infra* ¶¶ 16, 28-32. These unpaid invoices total \$32,848. It is denied that RSWC owes Beard Law \$16,257.50.

11. Denied. This paragraph contains a statement of law to which no response is necessary. *See also* New Matter, *infra* ¶¶ 22-32.

### NEW MATTER

12. The Counsel Fees Petition does not comply with Commission regulations because it does not include a verification as required by 52 Pa. Code § 1.36.

13. In Commission proceedings, when a claim is based on a document, the document or a material part thereof should be attached to the pleading. *Cf.* 52 Pa. Code § 5.22(a)(7). The Counsel Fees Petition did not include an engagement letter or other contract identifying Beard Law's client, the agreed-to rates, unpaid invoices, or other relevant documents supporting the claim that RSWC owes \$16,257.50. As stated in Paragraph 10, the invoices submitted to the Receiver do not support a claim for this amount.

14. As Receiver of RSWC, PAWC was empowered or directed to:

- Make reasonable efforts to establish the financial position of RSWC at the time PAWC assumed receivership. March 2025 Order, Appendix A ¶ 1.p.
- Keep financial and accounting records and all pertinent operating data and information relating to the system as prudent industry and utility practices would require. *Id.* at ¶ 1.h.
- Assume RSWC's billing and collection functions. *Id.* at ¶ 1.i.
- Provide for normal routine maintenance and the provision of supplies for the system. *Id.* at ¶ 1.g.

- Have the authority to borrow money in the name of RSWC necessary for the continued provision of adequate, efficient, safe and reasonable service to the customers of RSWC. *Id.* at ¶ 1.k.
- Should RSWC be unable to obtain necessary financing for ensuring the continued provision of adequate, efficient, safe and reasonable service to the customers of RSWC, PAWC, at its option, may either directly provide financing for RSWC or file a petition for bankruptcy. *Id.* at ¶ 2.a.
- Have the authority to file a petition for bankruptcy and participate in such proceedings on behalf of RSWC. *Id.* at 1.1.
- Charge RSWC reasonable rates for all services rendered to or for RSWC on behalf of the receivership. *Id.* at ¶ 1.u.
- Establish a deferred expense account for expenses incurred by RSWC that are payable to PAWC. *Id.* at ¶ 1.q.
- Establish a deferred expense account for expenses incurred by PAWC resulting from the March 2025 Order, including prudent and reasonable legal expenses. *Id.* at ¶ ¶ 2.b.

15. PAWC has made a reasonable effort to establish the financial position of RSWC at the time PAWC assumed receivership, assumed RSWC’s billing and collection functions, and kept financial and accounting records relating to the RSWC water system (the “System”).

16. RSWC’s funds on hand as of the time PAWC became Receiver, together with the funds collected from RSWC’s customers, have not been sufficient to cover all the expenses of RSWC during PAWC’s Receivership. Pursuant to Appendix A, ¶ 2.a., PAWC directly provided financing for RSWC to pay these expenses. PAWC made a wire transfer of \$10,251.93 to RSWC’s checking account on May 21, 2025 to cover unexpected expenses (\$7,269.50 for a replacement well pump, \$1,001.75 to haul a generator to Rock Spring, \$929.00 for work on the generator, \$1,051.68 for emergency service on the generator). **Exhibit B.** PAWC also made a wire transfer of \$3,000 to RSWC’s checking account on October 29, 2025 to cover paving repairs. **Exhibit C.** As a result, RSWC has an outstanding balance due of \$13,251.93 to PAWC as Receiver.

17. The chart below shows RSWC’s monthly bank account balances at the end of each month from January through November 2025, and its current balance as of the date this chart was prepared (December 2, 2025). This chart includes the wire transfers from PAWC to RSWC

described in Paragraph 16. The balance of funds on hand for RSWC as of December 2, 2025 was \$13,409.36.

<b>Rock Springs Water Company monthly bank account balances</b>				
	Old checking	AW new checking	Savings	Total
1/31/2025	\$ 4,554.53			\$ 4,554.53
2/28/2025	\$ 11,050.05			\$ 11,050.05
3/31/2025	\$ 8,976.94		\$ 9,832.02	\$ 18,808.96
4/30/2025	\$ 9,282.01			\$ 9,282.01
5/31/2025	\$ 1,100.63	\$ 4,637.51		\$ 5,738.14
6/30/2025	\$ -	\$ 23,653.79	\$ 500.02	\$ 24,153.81
7/31/2025	\$ (581.06)	\$ 9,163.29		\$ 8,582.23
8/31/2025	\$ 178.23	\$ 14,459.50		\$ 14,637.73
9/30/2025	\$ -	\$ 21,653.12	\$ 500.03	\$ 22,153.15
10/31/2025	\$ -	\$ 7,430.08	\$ 500.00	\$ 7,930.08
11/30/2025	\$ 119.00	\$ 3,587.41	\$ 11,212.65	\$ 14,919.06
12/2/2025	\$ -	\$ 12,909.36	\$ 500.00	\$ 13,409.36

18. PAWC must pay certain expenses of RSWC due after December 2, 2025. When these expenses are paid, the balance in RSWC’s checking account will be \$7,404.47.

19. In addition to the outstanding invoices from Beard Law, PAWC as Receiver is reviewing a claim from J. Roy Campbell against RSWC for \$3,600 for leasing space in Mr. Campbell’s home to RSWC for office space during 2025. Thus the outstanding claims against RSWC ( $\$3,600 + \$32,848 = \$36,448$ ) are almost five times the funds in RSWC’s checking account after December expenses have been paid (a total of \$7,404.47). When the outstanding debt to PAWC is included, RSWC’s liabilities will exceed its cash on hand by \$42,295.46. When the outstanding DEP penalty of \$40,000 is included, this figure comes to \$82,295.46, but this amount does not include any deferred expenses in the accounts that PAWC was authorized to create for expenses incurred as Receiver (including PAWC’s prudent and reasonable legal expenses, as further explained in ¶ 29, *infra*). Appendix A ¶¶ 1.q and 2.b

20. To date, PAWC has not attempted to borrow money in the name of RSWC because borrowing money would incur interest expense, increasing the costs that would be passed on to ratepayers.

21. To date, PAWC not placed RSWC into bankruptcy because doing so could stay the instant proceeding, due to the automatic stay provision of the United States Bankruptcy Code. 11 U.S.C. § 362.<sup>2</sup>

22. To date, PAWC has not charged RSWC a reasonable rate for services rendered to or for RSWC on behalf of the Receivership, pursuant to Appendix A ¶ 1.u. PAWC reserves the right to charge RSWC a reasonable rate for services rendered to or for RSWC pursuant to ¶ 1.u in the future.

24. In the March 2025 Order, the Commission directed RSWC to “negotiate in earnest” for the transfer of its water system to the State College Borough Water Authority (“SCBWA”). March 2025 Order, Ordering Paragraph 6.

25. RSWC and SCBWA engaged in negotiations but failed to reach an agreement. SCBWA St. No. 4 p. 1.

26. RSWC (not PAWC as Receiver of RSWC) elected to contest the on-going Section 529 proceeding. *See, e.g.*, RSWC’s Main Brief and Reply Brief (arguing that the Commission should not order a capable public utility to acquire RSWC).

27. Additional invoices are anticipated from Beard Law. The Counsel Fees Petition requests payment of legal fees incurred through October 31, 2025. Counsel Fees Petition ¶ 10. After the Counsel Fees Petition was filed, PAWC received an invoice for legal fees incurred during November, 2025. At this point, all briefs have been filed in this proceeding. However, following

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<sup>2</sup> PAWC’s Main Brief and Reply Brief, however, recommend that the Commission direct PAWC to place RSWC into bankruptcy because the criteria for a Section 529 forced sale of Rock Spring have not been satisfied.

the issuance of a Recommended Decision, it is expected that RSWC will file Exceptions and/or Reply Exceptions. Following the entry of a Commission Order, RSWC could file an appeal. Even if RSWC does not, it is expected that, if the Commission orders PAWC to acquire the RSWC System, Beard Law will submit invoices for time spent attempting to negotiate an asset purchase agreement with PAWC and, possibly, for time spent representing RSWC in an eminent domain proceeding to establish the purchase price of the RSWC System. 66 Pa. C.S. § 529(e).

28. In the March 2025 Order, the Commission stated:

Having acted to ensure the RSWC's customers' access to the necessity of safe and reliable water service, our focus now turns to the need to ensure that PAWC's assumption of receivership during the interim period will be under terms which assure PAWC of a cost recovery mechanism for PAWC's reasonable and necessary expenditures related to its duties as receiver. Such cost recovery mechanism is to assure that PAWC's customers are not required to bear the costs of PAWC's receivership of RSWC.

March 2025 Order p. 38.

29. As stated above, the March 2025 Order, Appendix A, Paragraph 2.b. allowed PAWC to establish a deferred expense account for expenses incurred by PAWC resulting from the March 2025 Order, "including prudent and reasonable legal expenses." *Id.* at ¶¶ 2.b. Considering the specific language of this paragraph, and the language from page 38 of the Commission's Order (quoted in Paragraph 28 above), PAWC respectfully submits that the Commission's intent was that this deferred expense account would allow PAWC to recover prudent and reasonable legal expenses *incurred by PAWC*, not RSWC. PAWC does not believe the Commission intended to make PAWC's ratepayers responsible for legal fees incurred – but not paid – by RSWC. The shareholders and/or officers of RSWC made the decision to contest the Section 529 proceeding rather than selling the System to SCBWA after the Commission issued the March 2025 Order. The consequences of that decision should be borne by them – not by the ratepayers of PAWC.

30. PAWC respectfully submits that the March 2025 Order intended that PAWC, as Receiver, would give priority in spending the limited funds of RSWC to expenses incurred to ensure the provision of reasonable and adequate service to the customers of RSWC. Moreover, PAWC respectfully submits that, if RSWC's funds are insufficient to pay *expenses incurred to ensure the provision of reasonable and adequate service to the customers of RSWC*, the Commission intended that PAWC would borrow money or spend its own funds *to pay those expenses*, subject to an appropriate cost recovery mechanism.

31. The expenses in question in the Counsel Fees Petition, however, are not expenses incurred to ensure the provision of reasonable and adequate service to the customers of RSWC. PAWC respectfully submits that the Commission intended that *such additional expenses of RSWC* would be paid by the Receiver only if funds were available from RSWC after paying the expenses incurred to ensure the provision of reasonable and adequate service to the customers of RSWC. That is, the Commission did not intend to require PAWC's ratepayers or its shareholders to bear costs such as RSWC's litigation expenses.

32. Considering that RSWC's funds are not currently sufficient to pay expenses incurred to ensure the provision of reasonable and adequate service plus additional expenses, such as RSWC's litigation costs, PAWC acted consistent with its authority as Receiver in declining to pay counsel fees at this time. If, in the future, RSWC accumulates sufficient funds to pay expenses incurred to ensure the provision of reasonable and adequate service plus the costs of RSWC's litigation, PAWC will pay additional amounts due to Beard Law. In the meantime, Beard Law may wish to seek an equity contribution from the shareholders of RSWC in an amount sufficient to allow the Receiver to pay its fees. After all, it is RSWC's shareholders who, by refusing to sell

the RSWC system and electing to contest the on-going Section 529 proceeding, are causing legal fees to be incurred by RSWC.

**CONCLUSION AND REQUEST FOR RELIEF**

WHEREFORE, for all the reasons stated above, PAWC requests that the Honorable Administrative Law Judge John M. Coogan recommend that the Pennsylvania Public Utility Commission:

- (a) DENY the Counsel Fees Petition at this time, but
- (b) Authorize PAWC, as Receiver, to pay RSWC's counsel fees if and when PAWC has sufficient funds on hand from RSWC to pay both (a) the expenses incurred to ensure the provision of reasonable and adequate service to RSWC's customers plus (b) the other expenses of RSWC (including its litigation expenses).

[Signature appears on next page.]

Respectfully submitted,



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Elizabeth Rose Triscari, Esq. (PA ID #306921)  
Teresa K. Harrold, Esq (PA ID #311082)  
Erin K. Fure, Esq. (PA ID # 312245)  
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E-mail: jnase@cozen.com

Date: December 5, 2025

**EXHIBIT A**

Paid \$2025.00 6-2-25 On-line Check # 5002

**Beard Law Company**

101 N Allegheny Street  
 Bellefonte, PA 16823  
 814-548-0028 www.beardlawco.com

**Invoice**

Due Date	Date	Invoice #
5/31/2025	5/1/2025	23077

**Bill To:**  
 Rock Spring Water Company  
 1750 Tadpole Road  
 Pennsylvania Furnace, PA 16865

**Balance Due** \$2,025.00

Please check box if address is incorrect or has changed, and indicate changes on reverse side.  
 New e-mail address? Enter here

Date	Description	Amount
4/1/2025	Emails re HRG proposal and PA American meeting with Citizens Bank	275.00
4/10/2025	Meeting with Roy & Elizabeth Campbell re status	450.00
4/10/2025	Review and respond to email from T. Harold re negotiations with SCBWA	110.00
4/14/2025	Review information from E. Campbell	110.00
4/14/2025	Telephone call with B. Mix re SCBWA agreement	90.00
4/14/2025	Prepare Notice of Agenda for Shareholder Meeting	302.50
4/15/2025	Finalize Agenda for Special Shareholder Meeting; email E. Campbell re same	110.00
4/17/2025	Review SCBWA proposed purchase agreement; prepare notes/memo re same; email B. Mix re same	577.50

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

<b>Total</b>	\$2025.00
<b>Payments/Credits</b>	\$0.00
<b>Balance Due</b>	\$2025.00

A service fee of 1.5% will be added to the balance due if not paid by 6/2/25

Paid 6-30-25 \$1,652.50 On-line

**Beard Law Company**

101 N. Allegheny Street  
 Bellefonte, PA 16823

814-548-0028      www.beardlawco.com

**Invoice**

Due Date	Date	Invoice #
6/30/2025	6/1/2025	23117

**Bill To:**

Rock Spring Water Company  
 1750 Tadpole Road  
 Pennsylvania Furnace, PA 16865

**Balance Due**

Please check box if address is incorrect or has changed,  
 and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

		Project
Date	Description	Amount
5/1/2025	Review and respond to email from E. Campbell re shareholder meeting, etc.	165.00
5/1/2025	Review email and documents from B. Mix	330.00
5/1/2025	Forward same to E. Campbell	55.00
5/2/2025	Email A. Chaplin of DEP re judgment	82.50
5/12/2025	Telephone call to E. Campbell re status and L. Dininni issue	60.00
5/13/2025	Teams meeting with DEP and SCBWA re forgiveness of judgment	192.50
5/13/2025	Review Commonwealth Court docket; prepare Entry of Appearance	275.00
5/16/2025	Filing Entry of Appearance in Commonwealth Court case	192.50
5/21/2025	Review PAWC 60-day status report to PUC	110.00
5/22/2025	Prepare for shareholder meeting; prepare shareholder list; email E. Campbell re same	962.50
5/22/2025	Attend shareholders meeting	540.00
5/27/2025	Prepare minutes of shareholder meeting; email E. Campbell re same	412.50
5/28/2025	Respond to email from E. Campbell re criminal attorneys	82.50

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

A service fee of 4% will be added to invoice when paid by credit card

<b>Total</b>
<b>Payments/Credits</b>
<b>Balance Due</b>

# Beard Law Company

101 N. Allegheny Street  
 Bellefonte, PA 16823

814-548-0028      www.beardlawco.com

# Invoice

Due Date	Date	Invoice #
6/30/2025	6/1/2025	23117

**Bill To:**

Rock Spring Water Company  
 1750 Tadpole Road  
 Pennsylvania Furnace, PA 16865

**Balance Due** \$3,707.50

Please check box if address is incorrect or has changed, and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

		Project
Date	Description	Amount
5/28/2025	Respond to email from T. Harrold re shareholder meeting	137.50
5/28/2025	Respond to email from A. Chaplin re shareholder meeting	110.00

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

A service fee of 4% will be added to invoice when paid by credit card

<b>Total</b>	<b>\$3707.50</b>
<b>Payments/Credits</b>	<b>\$0.00</b>
<b>Balance Due</b>	<b>\$3707.50</b>

# Beard Law Company

101 N. Allegheny Street  
 Bellefonte, PA 16823

814-548-0028

www.beardlawco.com

# Invoice

Due Date	Date	Invoice #
6/30/2025	6/1/2025	23117

**Bill To:**

Rock Spring Water Company  
 1750 Tadpole Road  
 Pennsylvania Furnace, PA 16865

**Balance Due**

Please check box if address is incorrect or has changed, and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

Project

Date	Description	Amount
5/1/2025	Review and respond to email from E. Campbell re shareholder meeting, etc.	165.00
5/1/2025	Review email and documents from B. Mix	330.00
5/1/2025	Forward same to E. Campbell	55.00
5/2/2025	Email A. Chaplin of DEP re judgment	82.50
5/12/2025	Telephone call to E. Campbell re status and L. Dininni issue	60.00
5/13/2025	Teams meeting with DEP and SCBWA re forgiveness of judgment	192.50
5/13/2025	Review Commonwealth Court docket; prepare Entry of Appearance	275.00
5/16/2025	Filing Entry of Appearance in Commonwealth Court case	192.50
5/21/2025	Review PAWC 60-day status report to PUC	110.00
5/22/2025	Prepare for shareholder meeting; prepare shareholder list; email E. Campbell re same	962.50
5/22/2025	Attend shareholders meeting	540.00
5/27/2025	Prepare minutes of shareholder meeting; email E. Campbell re same	412.50
5/28/2025	Respond to email from E. Campbell re criminal attorneys	82.50

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

A service fee of 4% will be added to invoice when paid by credit card.

<b>Total</b>
<b>Payments/Credits</b>
<b>Balance Due</b>

Paid \$12,025 8-22-25 On-line

**Beard Law Company**

101 N. Allegheny Street  
 Bellefonte, PA 16823

814-548-0028      www.beardlawco.com

**Invoice**

Due Date	Date	Invoice #
6/30/2025	6/1/2025	23117

**Bill To:**

Rock Spring Water Company  
 1750 Tadpole Road  
 Pennsylvania Furnace, PA 16865

**Balance Due** \$2,025.00

Please check box if address is incorrect or has changed,  
 and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

Project

Date	Description	Amount
5/28/2025	Respond to email from T. Harrold re shareholder meeting	137.50
5/28/2025	Respond to email from A. Chaplin re shareholder meeting	110.00

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

A service fee of 4% will be added to invoice when paid by credit card.

<b>Total</b>	<b>\$3707.50</b>
<b>Payments/Credits</b>	<b>-\$1682.50</b>
<b>Balance Due</b>	<b>\$2025.00</b>

Paid \$ 775.00 7-25-25 On-line

**Beard Law Company**

101 N. Allegheny Street  
 Bellefonte, PA 16823

814-548-0028      www.beardlawco.com

**Invoice**

Due Date	Date	Invoice #
7/31/2025	7/1/2025	23167

**Bill To:**

Rock Spring Water Company  
 1750 Tadpole Road  
 Pennsylvania Furnace, PA 16865

**Balance Due** \$775.00

Please check box if address is incorrect or has changed, and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

		Project
Date	Description	Amount
6/1/2025	Review/forward email from Pennsylvania American	55.00
6/1/2025	Email E. Campbell re DEP adjustment	82.50
6/16/2025	Review/forward email from L. Triscari at Pennsylvania American	110.00
6/18/2025	Telephone call with B. Mix re status	60.00
6/18/2025	Emails to L. Triscari of Pennsylvania American and A. Chaplin at DEP re status	220.00
6/19/2025	Review and respond to email from T. Harrold of Pennsylvania American	82.50
6/19/2025	Email E. Campbell re any other options	82.50
6/20/2025	Email L. Triscari re conference call	82.50

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

A service fee of 4% will be added to invoice when paid by credit card

<b>Total</b>	<b>\$775.00</b>
<b>Payments/Credits</b>	<b>\$0.00</b>
<b>Balance Due</b>	<b>\$775.00</b>

Paid \$2880 9-5-25 on-line

**Beard Law Company**

101 N. Allegheny Street  
 Bellefonte, PA 16823

814-548-0028

www.beardlawco.com

**Invoice**

Due Date	Date	Invoice #
8/31/2025	8/1/2025	23222

**Bill To:**

Rock Spring Water Company  
 1750 Tadpole Road  
 Pennsylvania Furnace, PA 16865

**Balance Due** \$2,880.00

Please check box if address is incorrect or has changed, and indicate change(s) on reverse side.

New e-mail address? Enter here \_\_\_\_\_

		Project
Date	Description	Amount
7/18/2025	Review pre-hearing memos	577.50
7/22/2025	Review email from E. Campbell; review Section 529 statute; email E. Campbell re status and pre-hearing conference	357.50
7/22/2025	Telephone call with E. Campbell re pre-hearing conference	240.00
7/23/2025	Review documents for pre-hearing conference	550.00
7/23/2025	Attend pre-hearing conference	220.00
7/28/2025	Prepare Notice of Appearance in PUC matter; letter to Secretary of Commission re filing same; set up account; E-file Notice of Appearance	412.50
7/30/2025	Review and forward email from D. Gaines; respond to same	220.00
7/30/2025	Email D. Gaines re dates	110.00
7/30/2025	Review discovery requests from PA American and DEP; forward to Rock Spring Water Company	192.50

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

A service fee of 4% will be added to invoice when paid by credit card

<b>Total</b>	<b>\$2880.00</b>
<b>Payments/Credits</b>	<b>\$0.00</b>
<b>Balance Due</b>	<b>\$2880.00</b>

# Beard Law Company

101 N. Allegheny Street  
 Bellefonte, PA 16823

814-548-0028      www.beardlawco.com

# Invoice

Due Date	Date	Invoice #
9/30/2025	9/1/2025	23237

**Bill To:**

Rock Spring Water Company  
 1750 Tadpole Road  
 Pennsylvania Furnace, PA 16865

**Balance Due**

Please check box if address is incorrect or has changed, and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

Project

Date	Description	Amount
8/1/2025	Emails re date for meeting	110.00
8/7/2025	Review Answers of Rock Springs Water Company to DEP Set 1 Interrogatories; review and forward DEP Set 2 Interrogatories to Rock Springs Water Company	220.00
8/12/2025	Review email from E. Cambell re updates	82.50
8/13/2025	Review and forward request for information from Spotlight PA reporter	110.00
8/21/2025	Review and respond to email re payment of insurance premium	82.50
8/21/2025	Respond to email from J. Nase re discovery responses	82.50
8/25/2025	Review various discovery requests; review docket; prepare materials for responses to discovery	1,127.50
8/25/2025	Meeting with Roy and Elizabeth Campbell	600.00
8/25/2025	Review responses from DEP and PA American to Requests for Admission	192.50
8/26/2025	Review Supplemental Testimony of B. Heiser of SCBWA; prepare draft of written testimony of customers; prepare verification; email E. Campbell re same	852.50

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

A service fee of 4% will be added to invoice when paid by credit card

<b>Total</b>
<b>Payments/Credits</b>
<b>Balance Due</b>

# Beard Law Company

101 N. Allegheny Street  
 Bellefonte, PA 16823

814-548-0028      www.beardlawco.com

# Invoice

Due Date	Date	Invoice #
9/30/2025	9/1/2025	23237

**Bill To:**

Rock Spring Water Company  
 1750 Tadpole Road  
 Pennsylvania Furnace, PA 16865

**Balance Due** \$7,955.00

Please check box if address is incorrect or has changed, and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

		Project
Date	Description	Amount
8/27/2025	Witness statements; discovery responses; download materials; uploading materials; amend Articles; telephone call with A. Chaplin of DEP; telephone call with D. Gaines re meeting	2,227.50
8/28/2025	Forward numerous emails to RSWC	137.50
8/28/2025	Review and respond to email from A. Wolf re rejected e-filings; instructions to NLD re same	220.00
8/28/2025	Prepare Supplemental Responses to PAWC and DEP re Articles of Amendment	302.50
8/28/2025	Prepare for meeting with SCBWA	165.00
8/29/2025	Prepare for and attend meeting with SCBWA representatives	810.00
8/29/2025	Review, forward and respond to emails re public input at hearings	220.00
8/29/2025	Review emails and testimony re OCA witness; email to OCA re objections	412.50

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

<b>Total</b>	<b>\$7955.00</b>
<b>Payments/Credits</b>	<b>\$0.00</b>
<b>Balance Due</b>	<b>\$7955.00</b>

A service fee of 4% will be added to invoice when paid by credit card.

# Beard Law Company

101 N. Allegheny Street  
 Bellefonte, PA 16823

814-548-0028      www.beardlawco.com

# Invoice

Due Date	Date	Invoice #
10/31/2025	10/1/2025	23279

**Bill To:**

Rock Spring Water Company  
 1750 Tadpole Road  
 Pennsylvania Furnace, PA 16865

**Balance Due** \$5,910.00

Please check box if address is incorrect or has changed,  
 and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

Project

Date	Description	Amount
9/16/2025	Review emails re DEP subpoena	82.50
9/16/2025	Review testimony of witnesses	907.50
9/16/2025	Revise Agreement of SCBWA	1,100.00
9/17/2025	Finalize draft Purchase Agreement with SCBWA; Download Recorder of Deeds index of documents; email B. Mix re same	220.00
9/17/2025	Prepare Unanimous Consent of Shareholders; email E. & R. Campbell re same and Agreement	247.50
9/17/2025	Email E. Campbell re rebuttal testimony	165.00
9/17/2025	Review additional rebuttal testimony from DEP and PAWC; forward same to E. Campbell	275.00
9/19/2025	Review and forward public input hearing registration information	110.00
9/21/2025	Review and forward email from B. Mix rejecting suggested changes	82.50
9/24/2025	Telephone call with E. Campbell re public input hearing	150.00
9/24/2025	Meeting with L. Settle re public input hearing	330.00
9/25/2025	Review Byers letter and Coogan email re same	82.50
9/27/2025	Review and forward documents to L. Settle re public input hearings	412.50

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

<b>Total</b>	<b>\$5910.00</b>
<b>Payments/Credits</b>	<b>\$0.00</b>
<b>Balance Due</b>	<b>\$5910.00</b>

A service fee of 4% will be added to invoice when paid by credit card.

# Beard Law Company

101 N. Allegheny Street  
 Bellefonte, PA 16823

814-548-0028      www.beardlawco.com

# Invoice

Due Date	Date	Invoice #
10/31/2025	10/1/2025	23279

**Bill To:**

Rock Spring Water Company  
 1750 Tadpole Road  
 Pennsylvania Furnace, PA 16865

**Balance Due**

Please check box if address is incorrect or has changed, and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

Project

Date	Description	Amount
9/2/2025	Review Ferguson Township letter request for public input hearing	82.50
9/2/2025	Review information from E. Campbell re updates	275.00
9/2/2025	Review and forward email from ALJ Coogan re public input hearings	165.00
9/2/2025	Review and forward SCBWA Responses to PAWC Requests for Admissions	110.00
9/3/2025	Review email from E. Campbell re public input hearing; emails to Mannino re status	275.00
9/5/2025	Review OGA email and suggestions on Public Input Hearing Notice; email E. Campbell re same	110.00
9/8/2025	Prepare Responses to PA American Requests for Admission; email same to E. Campbell	220.00
9/8/2025	Review other parties' responses to same	137.50
9/9/2025	Review/forward email from ALJ Coogan re public notices	55.00
9/9/2025	Review and respond to email from E. Campbell re discovery responses and potentially interested party	82.50
9/10/2025	Conference call with S. Mannino, R. Campbell and E. Campbell	150.00
9/11/2025	Review/forward customer testimony letter	82.50

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

A service fee of 4% will be added to invoice when paid by credit card.

<b>Total</b>
<b>Payments/Credits</b>
<b>Balance Due</b>

# Beard Law Company

220 Regent Court, Suite A  
State College, PA 16801

814-548-0028

www.beardlawco.com

Due Date	Date	Invoice #
11/30/2025	11/1/2025	23324

**Bill To:**

Rock Spring Water Company  
1750 Tadpole Road  
Pennsylvania Furnace, PA 16865

**Balance Due** \$10,347.50

Please check box if address is incorrect or has changed,  
and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

		Project
Date	Description	Amount
10/16/2025	Emails re testimony	412.50
10/17/2025	Emails re DeMarco and RSWC witnesses	165.00
10/17/2025	Review Weinart appraisal	192.50
10/17/2025	Prepare for hearings	825.00
10/17/2025	Telephone call with A. Bakare re representation	90.00
10/17/2025	Telephone call wiith E. Campbell re same	90.00
10/19/2025	Review testimony; prepare cross examination questions; prepare for hearing	1,787.50
10/20/2025	Travel to and attend hearing in Harrisburg	3,000.00
10/21/2025	Draft letter to shareholders re appraisal and meeting	275.00
10/21/2025	Draft letter to Representative Haddock	330.00
10/30/2025	Brief review and forward revised settlement proposal	110.00
10/30/2025	Attend settlement conference	110.00
10/30/2025	Review revised settlement proposal where PAWC buys; email same to E. Campbell	247.50

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

WE HAVE MOVED! PLEASE NOTE NEW ADDRESS

A service fee of 4% will be added to invoice when paid by credit card

<b>Total</b>	<b>\$10347.50</b>
<b>Payments/Credits</b>	<b>\$0.00</b>
<b>Balance Due</b>	<b>\$10347.50</b>

# Beard Law Company

220 Regent Court, Suite A  
State College, PA 16801

814-548-0028

www.beardlawco.com

Due Date	Date	Invoice #
11/30/2025	11/1/2025	23324

**Bill To:**

Rock Spring Water Company  
1750 Tadpole Road  
Pennsylvania Furnace, PA 16865

**Balance Due**

Please check box if address is incorrect or has changed, and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

		Project
Date	Description	Amount
10/6/2025	Review information from L. Settle in public input hearings	220.00
10/8/2025	Review materials recieved from R. Campbell; email E. Campbell re same; review surrebuttal testimony of C. Keller and S. Maninno; forward same to RSWC; review Helser surrebuttal testimony; email same to RSWC	82.50
10/8/2025	Telephone call with E. Campbell	90.00
10/8/2025	Review/forward OCA Request for Admissions	110.00
10/8/2025	Review ALJ Coogan instructions re cross examination	110.00
10/9/2025	Review/respond to email from J. Williams re DiMarco testimony	192.50
10/9/2025	Review emails from parties re cross examination	82.50
10/9/2025	Letter to L.Glantz re F. Campbell shares	137.50
10/9/2025	Telephone call with C. Williams re status update	60.00
10/9/2025	Prepare letter to shareholders re status update	302.50
10/16/2025	Review prior testimony	687.50
10/16/2025	Review proposed settlement term sheet	110.00
10/16/2025	Complete and email cross examination matrix	137.50
10/16/2025	Attend settlement meeting	330.00
10/16/2025	Telephone call with J. Nave re PAWC witness stipulation	60.00

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

WE HAVE MOVED! PLEASE NOTE NEW ADDRESS.

A service fee of 4% will be added to invoice when paid by credit card

<b>Total</b>
<b>Payments/Credits</b>
<b>Balance Due</b>

# Beard Law Company

220 Regent Court, Suite A  
State College, PA 16801

814-548-0028

www.beardlawco.com

Due Date	Date	Invoice #
12/31/2025	12/1/2025	23317

**Bill To:**

Rock Spring Water Company  
1750 Tadpole Road  
Pennsylvania Furnace, PA 16865

**Balance Due** \$8,636.05

Please check box if address is incorrect or has changed,  
and indicate change(s) on reverse side.

New e-mail address? Enter here: \_\_\_\_\_

Project

Date	Description	Amount
11/3/2025	Reimbursable Expense - Sargent's Court Reporting	319.35
11/3/2025	Reimbursable Expense - Sargent's Court Reporting	750.00
11/5/2025	Reimbursable Expense - Sargent's Court Reporting	416.70
11/4/2025	Work on Brief	412.50
11/5/2025	Download 1 p.m. Public Input Hearing transcript	412.50
11/5/2025	Review transcript	412.50
11/5/2025	Prepare, finalize and file Brief	2,200.00
11/10/2025	Review I & E and DEP Briefs	302.50
11/10/2025	Review PAWC Brief	275.00
11/12/2025	Prepare for shareholder meeting	192.50
11/12/2025	Attend shareholder meeting	495.00
11/13/2025	Email other counsel re shareholder meeting	110.00
11/16/2025	Work on Reply Brief	412.50
11/19/2025	Prepare draft of Reply Brief	687.50
11/19/2025	Prepare Petition for Counsel Fees	192.50
11/20/2025	Finalize Reply Brief	660.00
11/20/2025	Finalize Petition for Fees	137.50
11/20/2025	Review PAWC 3rd quarter report; forward same to RSWC	110.00
11/24/2025	Review Reply Briefs of parties	137.50

A service charge of 1.5% per month (minimum of \$30) is added to accounts that are past due and will be added every month thereafter until the outstanding balance is paid in full.

WE HAVE MOVED! PLEASE NOTE NEW ADDRESS.

A service fee of 4% will be added to invoice when paid by credit card

<b>Total</b>	<b>\$8636.05</b>
<b>Payments/Credits</b>	<b>\$0.00</b>
<b>Balance Due</b>	<b>\$8636.05</b>

## EXHIBIT B

## Nase, Jonathan

---

**From:** Joseph F Woodward <Joseph.Woodward@amwater.com>  
**Sent:** Tuesday, May 6, 2025 12:28 PM  
**To:** Dennis Emory  
**Cc:** Jeremy M Resseguie  
**Subject:** Rock Springs Water Company wire transfer request  
**Attachments:** 1216\_001.pdf; 1215\_001.pdf

Dennis,

Can we have \$10,000 wired into our new checking account next week to cover the four invoices I attached. These four invoices are all for two unexpected emergencies we had to respond to since the receivership started (well pump replacement & generator response from storm). After paying three invoices this past Friday night the account balance is \$7,654.39. I still have other invoices to pay but have enough money in the checking to cover those other invoices. Let me know if this transfer is approved and when it will take place next week. Thanks!

Joe Woodward  
Senior Director, Central & Southeast PA Operations  
Pennsylvania American Water  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Office 717-550-1530

1

Cell 717-275-5942  
AW internal 7-365-0190  
[joseph.woodward@amwater.com](mailto:joseph.woodward@amwater.com)

2

**Modern Pump and Equipment, Inc.**

1538 Susquehanna Trail  
P.O. Box 200  
Liverpool, PA 17045

**Invoice**

DATE	INVOICE #
4/11/2025	4288

INVOICE TO:		FOR EQUIPMENT AND/OR SERVICES TO:		
Rock Springs Water Co ATTN: Jeremy Resseguie 105 Sodom Road Milton, PA 17847		Rock Springs Water Co 1750 Tadpole Rd. Pennsylvania Furnace, PA 16865		
CUSTOMER P.O. NO.		TERMS	PROJECT/JOB NAME	
VERBAL		Net 30	ROCK SPRINGS WELL	
ITEM	QUAN.	DESCRIPTION	RATE	AMOUNT
Mob/Demob Fee	1	SATURDAY EMERGENCY WORK ON 4-5-25 MOBE/DEMOBE LABOR AND EQUIPMENT BOOM TRUCK, SERVICE TRUCK, AND THREE MAN CREW	1,225.00	1,225.00
Pump Crew	6	THREE MAN PUMP CREW FOR MUNICIPAL SUBMERSIBLE WELL WORK EQUIPMENT ONSITE - BOOM TRUCK & SERVICE TRUCK	550.00	3,300.00
Subm. Cable	150	8-3 AWG W/GRND HD-DOUBLE JACKETED SUBMERSIBLE PUMP CABLE	3.03	454.50
MISC MTLs	1	MISC. PARTS FOR SUBMERSIBLE INSTALLATION SUBMERSIBLE SPLICE KIT, TAPE, NEVER-SEIZE INSTALLED CUSTOMER SUPPLIED PUMP AND MOTOR MOTOR: 6" FRANKLIN ELECTRIC 230V, 3PH, 20HP PUMP END: 6" GOULDS 225H20-6 140' OF 3" GALVANIZED PIPE	75.00	75.00
Mob/Demob Fee	1	MOBE/DEMOBE LABOR AND EQUIPMENT FOR PITLESS REPAIR ON 4-10-25 BOOM TRUCK, SERVICE TRUCK, AND TWO MAN PUMP CREW	850.00	850.00
Pump Crew	4	TWO MAN PUMP CREW WITH BOOM TRUCK AND SERVICE TRUCK TO TRY TO SEAL DISCONTINUED WILLIAMS WEDGE PITLESS ADAPTER	325.00	1,300.00
MISC MTLs	1	O-RING MATERIAL EXPRESS SHIPPING FROM BAKER **RECOMMEND REPLACEMENT PITLESS ADAPTER TO FULL STOP LEAK IN WELL**	65.00	65.00
		Sales Tax	6.00%	0.00
Thank you for your business.			<b>Total</b>	<b>\$7,269.50</b>

Please remit payment to Modern Pump & Equipment, Inc., P.O. Box 200, Liverpool, PA 17045. We can also accept payment by VISA or MASTERCARD. Please call with account information if you wish to charge your payment. All invoices are due within terms set. A late charge of 1.5% per month will be added to any unpaid balances.

D. J. WISOR & SONS

135 CALEB ROAD  
WEST DECATUR, PA. 16878

# Invoice

Date	Invoice #
4/30/2025	4632

<b>Bill To</b>
Rock Spring Water Company 1750 Tadpole Road Pennsylvania Furnace PA 16865

<b>Ship To</b>

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project	
generator			4/30/2025				
Quantity	Item Code	Description			U/M	Price Each	Amount
		4-30-25 hauled generator from Philipsburg to Rock Springs Pump Station					
4.5	Driver	Hours				50.50	227.25
4	labor	hours				45.50	182.00
4.5	pick up Tk					25.00	112.50
1	mobilization	each				120.00	120.00
1	lump sum	filled up generator with fuel				360.00	360.00
<b>Total</b>						\$1,001.75	

D. J. WISOR & SONS

- 135 CALEB ROAD  
WEST DECATUR, PA. 16878

# Invoice

Date	Invoice #
5/2/2025	4634

<b>Bill To</b>
Rock Spring Water Company 1750 Tadpole Road Pennsylvania Furnace PA 16865

<b>Ship To</b>

P.O. Number	Terms	Rep	Ship	Via	F.O.B.	Project
generator			5/2/2025			
Quantity	Item Code	Description		U/M	Price Each	Amount
3	O.T. Driver	4-30-25 sent 2-men over to work on Generator			75.75	227.25
3	O.T. labor	hours			68.25	204.75
3	pick up Tk	hours			25.00	75.00
4	Driver	5-2-25 picked up generator at pump station on Tadpole			50.50	202.00
4	pick up Tk	rd. and took it to Beckwith in Milesburg			25.00	100.00
1	mobilization	Hours			120.00	120.00
		each				
					<b>Total</b>	\$929.00

MURRYSVILLE, PA  
724 - 327-1300  
888 - 232-5948



HARRISBURG, PA  
717 - 564-2121  
800 - 482-2378

PLEASE REMIT PAYMENT TO:  
Cleveland Brothers Equipment Co. Inc.  
P.O. Box 417094  
Boston, MA 02241-7094

SOLD TO:

PAWC MILTON  
SHARED SERVICES CENTER  
1 WATER ST  
CAMDEN NJ 08102

SHIP TO:

INVOICE NUMBER	INVOICE DATE	CUSTOMER NO.	CUSTOMER PURCHASE ORDER NUMBER	STORE	DIV	SALESMAN	TERMS	PAGE
MB89024	05-05-25	0621250		10	E	20	2	1
DOC/WO NO.	DOC. DATE	PC	LC	MC	SHIP VIA			INVOICE SEQ. NO.
MB89024	04-30-25	10	10	10				1
MAKE	MODEL	SERIAL NUMBER		EQUIPMENT NUMBER	METER READING		MACH. ID NO.	
AA	3306	08JJ00546			1529.0			
QUANTITY	ITEM	N/R	DESCRIPTION		UNIT PRICE		EXTENSION	
			* * * PROFORMA INVOICE * * *					
	EMERGENCY SERVICE CALL: WED 4/30/25 UNIT: 225KW PORTABLE GENERATOR LOCATION: 1750 TADPOLE RD, PA FURNANCE PA POC: JEREMY RESSEGUIE 570-412-6713							
	CONNECT GENERATOR UNIT: 225KW PORTABLE GENERATOR (CAT 3306 - SN: 8JJ00546-PAWC PHILIPSBURG) . SCOPE OF WORK: CONNECT PORTABLE AT WATER PLANT . GFL							
	CUSTOMER CONCERN TECH ID: 3105 -- WEDNESDAY, APRIL 30, 2025 - SERIAL NUMBER- 8JJ00546 HOURS 1532TRAVELED TO AND FROM SITE. WAITED ONSITE UNTIL GENERATOR ARRIVED. GAINED ACCESS TO PUMP BUILDING EMERGENCY PANEL AND GENERATOR. RAN CABLE AND HOOKED UP TO EMERGENCY PANEL AND GENERATOR. RAN UNIT UNDER LOAD FOR PROPER OPERATION. VERIFIED CLOCKWISE ROTATION FOR PUMP MOTORS. UNIT ONLINE SUPPLYING POWER TO PUMP BUILDING.							
			TOTAL LABOR		SEG. 01		547.25 *	
			SEGMENT 01 TOTAL				547.25 T	

**PAYMENT TERMS : PARTS / SERVICE NET 30 DAYS FROM INVOICE DATE**  
A SERVICE CHARGE OF UP TO 3% PER MONTH WILL BE ASSESSED ON PAST DUE AMOUNTS. IF AN INVOICE IS DISPUTED THE DISPUTE MUST BE IN WRITING AND ANY PAYMENT OR INSTRUMENT TENDERED AS FULL SATISFACTION OF A DEBT, MUST BE ADDRESSED TO: ATTENTION TREASURER, 4565 WILLIAM PENN HIGHWAY, MURRYSVILLE, PA 15668. ACCEPTANCE OF GOODS DELIVERED OR SERVICES PERFORMED CONSTITUTES ACCEPTANCE OF STANDARD TERMS AND CONDITIONS OF THE APPLICABLE CLEVELAND BROTHERS EQUIPMENT CO., INC. DOCUMENTATION, WHICH ARE INCORPORATED BY REFERENCE, A COPY OF WHICH CAN BE VIEWED AT [www.clevelandbrothers.com](http://www.clevelandbrothers.com) OR UPON WRITTEN REQUEST.

PAY THIS AMOUNT	➤	CONT'D
CREDIT AMOUNT	➤	

**TERMS: NET 30 DAYS  
UNLESS OTHERWISE STATED**

**PARTS NOT RETURNED WITHIN 10 DAYS FROM DATE OF INVOICE WILL BE CHARGED A RE-STOCKING CHARGE**  
CUSTOMER ORIGINAL INVOICE

MURRYSVILLE, PA  
724 - 327-1300  
888 - 232-5948



HARRISBURG, PA  
717 - 564-2121  
800 - 482-2378

PLEASE REMIT PAYMENT TO:  
Cleveland Brothers Equipment Co. Inc.  
P.O. Box 417094  
Boston, MA 02241-7094

SOLD TO:

PAWC MILTON  
SHARED SERVICES CENTER  
1 WATER ST  
CAMDEN NJ 08102

SHIP TO:

INVOICE NUMBER	INVOICE DATE	CUSTOMER NO.	CUSTOMER PURCHASE ORDER NUMBER	STORE	DIV	SALESMAN	TERMS	PAGE
MB89024	05-05-25	0621250		10	E	20	2	2
DOC/NO.	DOC. DATE	PG	LC	MC	SHIP VIA			INVOICE SEQ. NO.
MB89024	04-30-25	10	10	10				1
MAKE	MODEL	SERIAL NUMBER		EQUIPMENT NUMBER	METER READING		MACH. ID NO.	
AA	3306	08JJ00546			1529.0			
QUANTITY	ITEM	N/R	DESCRIPTION			UNIT PRICE	EXTENSION	
			* * *	PROFORMA INVOICE			* * *	
	TRAVEL TO/FROM ENGINE							
	TRAVEL TIME & MILEAGE			TVL - 128 (CHRIS)				
				TOTAL LABOR	SEG. 99		241.50	*
56.00				MILEAGE			196.00	
1.00				FUEL SURCHARGE			19.60	
				TOTAL MISC CHGS	SEG. 99		215.60	*
				SEGMENT 99 TOTAL			457.10	T
-----								
				SUPPLIES & ENVIR			47.33	T
* THANK YOU FOR BEING A VALUED CUSTOMER! OUR GOAL HERE AT CLEVELAND BROTHERS IS TO PROVIDE SUPERIOR SERVICE AND COMPLETE CUSTOMER SATISFACTION. IF WE HAVE NOT EARNED A RATING OF 10 PLEASE CALL OUR CUSTOMER CARE HOTLINE								

**PAYMENT TERMS :** PARTS / SERVICE NET 30 DAYS FROM INVOICE DATE  
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PAY THIS AMOUNT >	CONT'D
CREDIT AMOUNT >	

TERMS: NET 30 DAYS  
UNLESS OTHERWISE STATED

**PARTS NOT RETURNED WITHIN 10 DAYS FROM DATE OF INVOICE WILL BE CHARGED A RE-STOCKING CHARGE**  
CUSTOMER ORIGINAL INVOICE

MURRYSVILLE, PA  
 724 - 327-1300  
 888 - 232-5948



HARRISBURG, PA  
 717 - 564-2121  
 800 - 482-2378

PLEASE REMIT PAYMENT TO:  
 Cleveland Brothers Equipment Co. Inc.  
 P.O. Box 417094  
 Boston, MA 02241-7094

SOLD TO:  
 PAWC MILTON  
 SHARED SERVICES CENTER  
 1 WATER ST  
 CAMDEN NJ 08102

SHIP TO:

INVOICE NUMBER	INVOICE DATE	CUSTOMER NO.	CUSTOMER PURCHASE ORDER NUMBER	STORE	DIV	SALESMAN	TERMS	PAGE
MB89024	05-05-25	0621250		10	E	20	2	3
DOC/WO NO.	DOC. DATE	PC	LC	MC	SHIP VIA			INVOICE SEQ. NO.
MB89024	04-30-25	10	10	10				1
MAKE	MODEL	SERIAL NUMBER		EQUIPMENT NUMBER	METER READING		MACH. ID NO.	
AA	3306	08JJ00546			1529.0			
QUANTITY	ITEM	N/R	DESCRIPTION		UNIT PRICE		EXTENSION	
	AT 717-635-7617.		* * * PROFORMA INVOICE * * *					

**PAYMENT TERMS : PARTS / SERVICE NET 30 DAYS FROM INVOICE DATE**  
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PAY THIS AMOUNT ➤	1051.68
CREDIT AMOUNT ➤	

**TERMS: NET 30 DAYS  
 UNLESS OTHERWISE STATED**

**PARTS NOT RETURNED WITHIN 10 DAYS FROM DATE OF INVOICE WILL BE CHARGED A RE-STOCKING CHARGE**  
 CUSTOMER ORIGINAL INVOICE

**EXHIBIT C**

## Nase, Jonathan

---

**From:** Joseph F Woodward <Joseph.Woodward@amwater.com>  
**Sent:** Tuesday, October 28, 2025 5:17 PM  
**To:** Dennis Emory  
**Cc:** Liz R Triscari; Jeremy M Resseguie  
**Subject:** RE: Rock Springs checking account  
**Attachments:** 2395\_001.pdf

Dennis,

Here is another unplanned invoice that is scheduled to be paid this Friday for \$3,000 for paving of a leak repair that Ferguson Township contacted us about and required us to complete the paving before winter. The \$1,100 is a small amount of money I need to keep in the checking account to get by until customer payments start coming in in mid-November.

Joe Woodward  
Senior Director, Central & Southeast PA Operations  
Pennsylvania American Water  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Office 717-550-1530  
Cell 717-275-5942

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AW internal 7-365-0190  
[joseph.woodward@amwater.com](mailto:joseph.woodward@amwater.com)

**From:** Dennis Emory <Dennis.Emory@amwater.com>  
**Sent:** Tuesday, October 28, 2025 5:06 PM  
**To:** Joseph F Woodward <Joseph.Woodward@amwater.com>  
**Cc:** Liz R Triscari <Elizabeth.Triscari@amwater.com>; Jeremy M Resseguie <Jeremy.Resseguie@amwater.com>  
**Subject:** RE: Rock Springs checking account

Hi Joe,

Beyond the below items, are there any other invoices we can use to substantiate the additional request? I'll get a request out to Treasury but it'll be good to support the other \$1,100.

Regards,

Dennis  
O: 856-955-4327  
C: 856-281-4264

**From:** Joseph F Woodward <[Joseph.Woodward@amwater.com](mailto:Joseph.Woodward@amwater.com)>  
**Sent:** Tuesday, October 28, 2025 5:04 PM  
**To:** Dennis Emory <[Dennis.Emory@amwater.com](mailto:Dennis.Emory@amwater.com)>

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**Cc:** Liz R Triscari <[Elizabeth.Triscari@amwater.com](mailto:Elizabeth.Triscari@amwater.com)>; Jeremy M Resseguie <[Jeremy.Resseguie@amwater.com](mailto:Jeremy.Resseguie@amwater.com)>  
**Subject:** Rock Springs checking account

Dennis,

I received this email yesterday for payroll taxes that were not on my radar. These charges coming out this Friday along with the other invoices I have set up to pay over the next week will drain our checking account. Can I get a wire transfer from American Water of \$3,000 into the Rock Springs checking account. Rock Springs will be reading and billing in November so we will have a cash flow coming in again in a few weeks. Thanks!

Joe Woodward  
Senior Director, Central & Southeast PA Operations  
Pennsylvania American Water  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Office 717-550-1530  
Cell 717-275-5942  
AW internal 7-365-0190  
[joseph.woodward@amwater.com](mailto:joseph.woodward@amwater.com)

**From:** rock springs <[rsw5@comcast.net](mailto:rsw5@comcast.net)>  
**Sent:** Monday, October 27, 2025 11:44 AM  
**To:** Joseph F Woodward <[Joseph.Woodward@amwater.com](mailto:Joseph.Woodward@amwater.com)>  
**Cc:** Jeremy M Resseguie <[Jeremy.Resseguie@amwater.com](mailto:Jeremy.Resseguie@amwater.com)>  
**Subject:** Payroll tax

3

Joe/Jeremy,

Please keep the below amounts in checking to be withdrawn. 10-31-25

\$1319.63 federal

\$264.79 Pa w3

\$65.35 Uc2

\$202.69 Local

Please keep \$500 in savings at all times.

Liz

The information and all attachments included in the above email is confidential and is solely for the recipient indicated. Any recipient shall not copy, forward, or release any information to another party.

Thank you

Rock Spring Water Company  
1750 Tadpole Rd  
Pa Furnace, PA 16865  
Phone 814-231-2911  
Dial 8-1-1 before you dig

4

Paid \$3,000 10-31-25 on-line

D. J. WISOR & SONS  
135 CALEB ROAD  
WEST DECATUR, PA. 16878

# Invoice

Date	Invoice #
10/9/2025	4667

Bill To
Rock Spring Water Company 1750 Tadpole Road Pennsylvania Furnace PA 16865

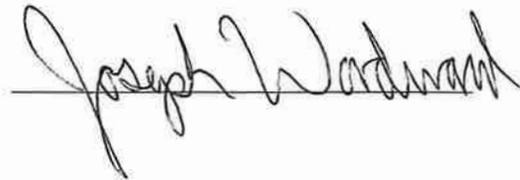
Ship To

P:Q. Number	Terms	Rep	Ship	Via	F.O.B.	Project	
paving	Net 30		10/9/2025				
Quantity	Item Code	Description			U/M	Price Each	Amount
1	lump sum	paved at 406 Rosewood Circle , Pennsylvania Furnace , paving				3,000.00	3,000.00
<b>Total</b>						\$3,000.00	

**VERIFICATION**

I, Joseph Woodward, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 12/4/25

A handwritten signature in cursive script that reads "Joseph Woodward". The signature is written in black ink and is positioned above a horizontal line.