

**Application of Pennsylvania-American Water Company for Acquisition of Substantially  
All of the Assets, Properties and Rights Related to the Wastewater System Owned and  
Operated by the City of Pittston**

**66 Pa. C.S. §1329**

**Application Filing Checklist – Water/Wastewater**

**Docket No. A-2025-3056419**

1. Transmittal letter with caption and state that the filing is pursuant to 66 Pa C.S. §1329.

**RESPONSE:**

See enclosed transmittal letter from Erin K. Fure, Esquire, with caption and statement that the filing is pursuant to 66 Pa. C.S. § 1329 attached as **Appendix A-1.**



**Erin K. Fure**  
Counsel (PA&NJ)  
852 Wesley Drive | Mechanicsburg, PA 17055  
Phone: 717-550-1556 | Fax: 717-550-1255  
[erin.fure@amwater.com](mailto:erin.fure@amwater.com)

January 16, 2026

**FILED VIA COMMISSION'S SHAREPOINT SITE AND ELECTRONIC FILING**

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

**In re: Application of Pennsylvania-American Water Company under Sections 1102(a) and 1329 of the Pennsylvania Public Utility Code, 66 Pa C.S. §§ 1102(a) and 1329, for approval of (1) the transfer, by sale, to Pennsylvania-American Water Company, of substantially all of the assets, properties and rights related to the Stormwater and Sanitary Wastewater Collection and Conveyance System of the City of Pittston and (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in portions of the Borough of Hughestown, Luzerne County, Pennsylvania, the Borough of Duryea, Luzerne County, Pennsylvania, and Pittston Township, Luzerne County Pennsylvania, and the City of Pittston, Luzerne County, Pennsylvania - Docket No: A-2025-3056419**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission ("Commission") are the above-referenced application and related filings of Pennsylvania-American Water Company ("PAWC") for its acquisition of substantially all of the assets, properties and rights related to the wastewater system owned and operated by the City of Pittston ("City of Pittston"). This filing is made pursuant to Sections 507 (related to filing of contracts with municipal corporations), 1102 (related to certificates of public convenience), and 1329 (determination of fair market value for ratemaking purposes) of the Pennsylvania Public Utility Code ("Code"), 66 Pa. C.S. §§ 507, 1102, 1329.

Copies of the Application have been served upon the statutory advocates in accordance with the attached Certificate of Service and in accordance with the Commission's *Final Supplemental Implementation Order* entered February 28, 2019 at Docket No. M-2016-2543193. The Public and **CONFIDENTIAL** filings will be uploaded to the Commission's SharePoint site and hard copies of the Public and **CONFIDENTIAL** versions will be delivered to the Commission by Wednesday, January 21, 2026.

Also enclosed on behalf of PAWC, as part of the Section 1329 filing requirements, are the Direct Testimony and accompanying exhibits of the following:

1. Direct Testimony of Michael Salvo, Director of Business Development, Pennsylvania-American Water Company (**PAWC Statement No. 1**)
2. Direct Testimony of Michael J. Guntrum, Senior Planning Engineer, Pennsylvania-American Water Company (**PAWC Statement No. 2**)
3. Direct Testimony of Dr. Christina E. Chard, Senior Director of Rates and Regulatory, Pennsylvania-American Water Company (**PAWC Statement No. 3**)
4. Direct Testimony of Jerome C. Weinert, ASA, P.E., CDP, Principal and Owner, Weinert Appraisal and Depreciation Services, LLC (also known as WADS Consultants), PAWC Utility Valuation Expert (**PAWC Statement No. 4**)

In addition, as directed by the *Final Supplemental Implementation Order*, PAWC is submitting the following direct testimony and accompanying exhibits on behalf of the City of Pittston. PAWC's submission of this testimony should not be considered support for or sponsoring of such testimony. PAWC anticipates that the City of Pittston will intervene in this matter and will sponsor its direct testimony and exhibits.

1. Direct Testimony of the Honorable Michael Lombardo, Mayor – City of Pittston (**City of Pittston Statement No. 1**)
2. Direct Testimony of Harold Walker, III, Manager of Financial Studies of Gannett Fleming Valuation and Rate Consultants, LLC, City of Pittston Utility Valuation Expert (**City of Pittston Statement No. 2**)

Copies of this prepared direct testimony and accompanying exhibits can be found at **Appendix A-13-a and A-13-b (City of Pittston)** and **Appendix A-14-a and A-14-b (PAWC)** of the Application.

In compliance with Code Section 507, 66 Pa. C.S. § 507, PAWC has also included a copy of the Asset Purchase Agreement (“APA”) for this transaction. This agreement can be found at **Appendix A-24-a** of the Application.

Additionally, the following Appendices have been labeled as **CONFIDENTIAL**:

- Appendix A-4.2 – WADS Consultants Work Papers
- Appendix A-4.3 – Gannett Fleming Work Papers
- Appendix A-15-a – Engineer Assessment which Depict Location of Sewerage Facilities
- Appendix A-16-f – Map of Service Area Depict Location of Facilities
- Appendix A-25.b through A-25.d – Map Depicting Location of Facilities

Finally, PAWC has deliberately and thoughtfully chosen today's filing date, in anticipation of a final Commission order at the Public Meeting scheduled for October 22, 2026. PAWC's proposed timeline assumes the following approximate dates:

1/16/26	PAWC Files Application
3/20/26	TUS Conditionally Accepts PAWC Application for Filing via Secretarial Letter (Conditioned on Completion of Notice Requirements)
4/24/26	PAWC Provides Verification of Notice Completion to PUC Secretary/TUS
4/28/26	PAWC Application Officially Accepted for Filing via PUC Secretarial Letter/PUC Submits Notice to PA Bulletin for Publication
5/9/26	PA Bulletin Notice of PAWC Application
6/1/26	End of Application Protest / Intervention Period
10/22/26	PUC Final Action at Public Meeting

Thank you for your attention to this matter. Please do not hesitate to contact me if you have any questions.

Sincerely,



Erin K. Fure

cc: All Parties on the Attached Certificate of Service (**VIA** One Drive Link)