

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION Application of Greater Hazleton Community Area New Development Organization Inc. t/a CAN DO, Inc. (Water Division)  
Docket No. A-2026-3059809**

**PROTEST OF Patricia Kisenwether**

I, Patricia Kisenwether, submit this Protest pursuant to 52 Pa. Code §§ 5.51–5.53 in opposition to the Application of Greater Hazleton Community Area New Development Organization Inc. t/a CAN DO, Inc. (Water Division) for approval to (1) expand water service into additional portions of Hazle Township, Sugarloaf Township, and West Hazleton Borough, and (2) abandon portions of its existing water service territory in Hazle Township and East Union Township.

**1. Standing** I am a property owner located off of Larock Road in Sugarloaf Twp and my home address is 96 Mt. Laurel Trail, Sugarloaf, PA (Black Creek Twp). The proposed expansion and abandonment directly affect water availability, service reliability, land use, and public safety in my community.

**2. Grounds for Protest** I oppose the Application on the following grounds:

- The Applicant has not demonstrated that the proposed expansion meets the statutory requirement of **public convenience and necessity** under 66 Pa.C.S. §1102.
- The Application appears inconsistent with existing **municipal planning, zoning, and infrastructure approvals**, and may conflict with ongoing regulatory reviews.
- The proposed **abandonment** may adversely affect existing or future customers in Hazle Township and East Union Township by reducing service options or creating gaps in coverage.
- The Applicant has not adequately demonstrated **technical, legal, or financial fitness** to serve the expanded territory.
- The record lacks sufficient information on **environmental, hydrologic, and fire-protection impacts**, including potential strain on existing water sources.

These issues require further investigation and formal hearings.

**3. Relief Requested** I respectfully request that the Commission:

- Deny the Application unless and until the Applicant provides complete, verified evidence addressing the concerns above; or
- In the alternative, schedule evidentiary hearings and require the Applicant to submit additional information; and

- Grant any other relief the Commission deems appropriate.

**4. Service** A copy of this Protest has been served on counsel for the Applicant, Jonathan P. Nase, Esq., Cozen O'Connor, 17 North Second St., Suite 1410, Harrisburg, PA 17101.

**Respectfully submitted,**

Patricia Kisenwether

96 Mt Laurel Trail, Sugarloaf, PA 18249

[pkisenwether@gmail.com](mailto:pkisenwether@gmail.com)

570-582-5665

Feb. 12, 2026

**Where to file**

You must file **on or before February 16, 2026** with:

**Secretary of the Pennsylvania Public Utility Commission** 400 North Street, 2nd Floor  
Harrisburg, PA 17120

OR electronically through the PUC website (eFiling system).

You must also **serve a copy on CAN DO's attorney**:

Jonathan P. Nase, Esq. Cozen O'Connor 17 North Second St., Suite 1410 Harrisburg, PA 17101  
jnase@cozen.com