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March 6, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

RE: Application of the City of Pittston, Nunc Pro Tunc, Pursuant to 66 PA. C.S. § 1102(A), for a Certificate of Public Convenience to Offer, Furnish, Render, and Supply Wastewater Service to the Public in Certain Portions of the Borough of Duryea, the Borough of Hughestown and Pittston Township, all in Luzerne County, Pennsylvania; Docket No. A-2026-3059911

Dear Secretary Homsher:

Attached for filing with the Pennsylvania Public Utility Commission is the Prehearing Conference Memorandum of Pennsylvania-American Water Company ("PAWC"), in the above-referenced proceeding.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a light blue horizontal line.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

Counsel to Pennsylvania-American Water Company

c: The Honorable Christopher P. Pell (via email)
The Honorable Barbara Shadie Nause (via email)
Office of Special Assistants (ra-OSA@pa.gov)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Adeolu A. Bakare

Counsel to Pennsylvania-American Water
Company

Dated this 6th day of March, 2026, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of the City of Pittston, *Nunc Pro Tunc*, :
Pursuant to 66 Pa. C.S. § 1102(a), for a Certificate :
of Public Convenience to Offer, Furnish, Render, :
and Supply Wastewater Service to the Public in : Docket No. A-2026-3059911
Certain Portions of the Borough of Duryea, the :
Borough of Hughestown and Pittston Township, all :
in Luzerne County, Pennsylvania :

**PREHEARING CONFERENCE MEMORANDUM
OF PENNSYLVANIA-AMERICAN WATER COMPANY**

Pursuant to the February 26, 2026, Prehearing Conference Order issued by Deputy Chief Administrative Law Judge ("DCALJ") Christopher P. Pell and Administrative Law Judge ("ALJ") Barbara Shadie Nause, the Pennsylvania-American Water Company ("PAWC") hereby submits this Prehearing Conference Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

On January 16, 2026, the City of Pittston ("City") filed with the Pennsylvania Public Utility Commission ("PUC" or "Commission") an Application for a Certificate of Public Convenience ("CPC"), *Nunc Pro Tunc*, pursuant to 66 Pa. C.S. § 1102(a), requesting to continue to offer, furnish, render, and supply wastewater collection and conveyance service to the public in certain portions of the Boroughs of Duryea and Hughestown and Pittston Township, Luzerne County, Pennsylvania ("Application"). The City also sought issuance of Certificates of Filing or approvals under Section 507 of the Public Utility Code, 66 Pa. C.S. § 507, for certain agreements.

On May 30, 2025, PAWC and the City entered into an Asset Purchase Agreement ("APA"), whereby the City agreed to convey the wastewater system to PAWC, and PAWC

agreed to provide wastewater service in the territory served by the City's sewer system, subject to Commission approval.

PAWC filed a Petition to Intervene in this proceeding on February 13, 2026. A description of PAWC is set forth in Paragraph 3 of PAWC's Petition to Intervene.

A Prehearing Conference has been scheduled in this proceeding for March 11, 2026.

II. ANTICIPATED ISSUES AND SUB-ISSUES

PAWC supports issuance of the CPCs requested by the City as consistent with the current operation of Pittston's sewer system and necessary to satisfy the City's obligations to furnish approvals necessary to serve the customers in Duryea and Hughestown Boroughs and Pittston Township for transfer to PAWC at closing on the transaction set forth in the APA. PAWC reserves the right to raise further issues as necessary and appropriate during the course of this proceeding, and to respond to issues raised by other parties.

III. PROPOSED WITNESSES

PAWC is in the process of evaluating whether it will sponsor testimony in this proceeding. In the event that PAWC decides to sponsor testimony, it will immediately inform the parties and the ALJs of any intended witnesses and topics of testimony. PAWC also intends to participate in this proceeding through the submission of discovery, cross-examination of other parties' witnesses, and the submission of briefs, exceptions, and reply exceptions, if necessary.

IV. PROPOSED SCHEDULE AND DISCOVERY RULES

PAWC believes the issues in this case can and should be resolved in an expedited manner in order to facilitate the transaction set forth in the APA. To that end, PAWC is working with the parties and will cooperate with the ALJs to address scheduling matters, including supporting proposals from parties to allow time for early settlement discussions and, to the extent necessary,

finalizing a procedural schedule for submission of testimony, hearings, and briefs, as well as the amount of hearing time needed. PAWC will also cooperate with the ALJs and the parties to finalize discovery rules in accordance with the Commission's regulations and any directives issued by the ALJs.

V. POSSIBILITY OF SETTLEMENT

PAWC is willing to participate in discussions with the other parties to amicably resolve the issues in this proceeding.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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Dated: March 6, 2026