



March 26, 2026

**VIA E-FILING**

**Dawn Kurtz Crompton**

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

**Re: Application of Greater Hazleton Community Area New Development Organization Inc. t/a CAN DO, Inc. (Water Division), Pursuant to Section 1102(a) of the Pennsylvania Public Utility Code, for Approval of (1) the Right to Offer, Render, Furnish or Supply Water Service To the Public in an Additional Portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, all in Luzerne County, Pennsylvania and (2) the Abandonment of Portions of its Water Service Territory in Hazle Township, Luzerne County, Pennsylvania; Docket No. A-2026-3059809**

**Supplemental Answers to Data Requests from the Bureau of Technical Utility Services**

Dear Secretary Homsher:

On behalf of the Greater Hazleton Community Area New Development Organization Inc. t/a CAN DO, Inc. (Water Division) ("CAN DO"), enclosed please find the Supplemental Answers to Data Requests from the Bureau of Technical Utility Services. Copies have been served as shown on the attached Certificate of Service.

Thank you for your attention to this filing. If you have any questions, please feel free to contact me.

Sincerely,

Cozen O'Connor

By: Dawn Kurtz Crompton  
Counsel for **Greater Hazleton Community Area New Development Organization Inc. t/a CAN DO, Inc. (Water Division)**

Enclosures

cc: Per Certificate of Service  
Paul Zander (*Bureau of Technical Utility Services*)  
Joseph Lettiere, President and CEO, CAN DO  
Raina Nichols, Director of Utilities, CAN DO

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Greater Hazleton Community :  
Area New Development Organization Inc. t/a :  
CAN DO, Inc. (Water Division), Pursuant to :  
Section 1102(a) of the Pennsylvania Public : Docket No. A-2026-3059809  
Utility Code, for Approval of (1) the Right to :  
Offer, Render, Furnish or Supply Water :  
Service To the Public in an Additional Portion :  
of Hazle Township, together with portions of :  
Sugarloaf Township and West Hazleton :  
Borough, Luzerne County, Pennsylvania and :  
(2) the Abandonment of Portions of its Water :  
Service Territory in Hazle Township, Luzerne :  
County, Pennsylvania :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 26<sup>th</sup> day of March, 2026 served a true copy of the foregoing **Supplemental Answers to Data Requests of the Bureau of Technical Utility Services (without **CONFIDENTIAL** Exhibits)** upon the parties, listed below and in the manner described below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**Via E-mail and First Class Mail**

Lisa Logan  
293 Tomhicken Road  
Sugarloaf, PA 18249  
[Lisalogan2662@gmail.com](mailto:Lisalogan2662@gmail.com)

Respectfully submitted,



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Dawn Kurtz Crompton, Esq.  
Counsel for *Greater Hazleton Community Area  
New Development Organization Inc. t/a CAN DO,  
Inc. (Water Division)*

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-1. In the Amended Application's Exhibit 6, CAN DO provided a copy of its proposed main extension (Main Extension) route from a point of connection with CAN DO's existing system to a new meter vault on the property of NP Hazleton Holdings 1, LLC (Developer). Additionally, the Amended Application's Exhibits 2 and 3 included copies of a map (Requested Territory Map) of the requested service territory (Requested Territory) comprised of various parcels of land owned by the Developer and a metes and bounds description of the Requested Territory, respectively. Please provide a copy of a map that depicts an area of land limited to a 100-foot corridor that is centered on the proposed route of the Main Extension inclusive of the meter vault, and a metes and bounds description along with the area of land, quantified in acres.

Answer:

CAN DO is in the process of collecting this information and will provide the metes and bounds in a supplemental response

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Supplemental Answer:**

Please see Exhibit A-1 Supplemental (**CONFIDENTIAL**), which is a map showing a 100-foot corridor as TUS has requested in question A-1 above. The map also shows a 20-foot corridor, which is the actual width of the as-proposed easement. CAN DO is proposing a 10-foot wide easement on each side of the Main Extension, for a total 20-foot easement.

Please see Exhibit A-1(a) Supplemental (**CONFIDENTIAL**) for the metes & bounds of the 100-foot wide utility corridor as TUS has requested in question A-1 above.

Please also see Exhibit A-8 Supplemental (**CONFIDENTIAL**) for the metes & bounds of CAN DO's actual as-proposed 20-foot wide utility easement.

Supplemental Answer provided by: Raiana Nichols, Director of Utilities

Date: March 26, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

- A-2. The Amended Application's Sections 26 and 27 identified that CAN DO requested to abandon water public utility service to portions of its certificated service territory in Hazle Township, Luzerne County and in East Union Township, Schuylkill County (Abandonment Areas) and that the Abandonment Areas include properties that currently receive water service from private wells (Private Well Parcels). Additionally, the Amended Application's Exhibit 8 included a copy of a map (Abandonment Area Map) that depicted seven noncontiguous areas of land that comprise the Abandonment Areas. However, the Amended Application did not include metes and bounds descriptions for each Abandonment Area depicted in the Abandonment Area Map. Further, the Commission notes the Amended Application is unclear as to whether removal of the Abandonment Areas from CAN DO's certificated territory is necessary or impacts CAN DO's ability to provide water service to the Requested Territory. Please provide responses for the following:
- a. Provide a metes and bound description for each Abandonment Area along with each area of land quantified in acres;
  - b. Clarify whether CAN DO can provide adequate water supply, treatment, storage and distribution capacity to meet present and future customer demands for customers in the Requested Territory regardless of the Commission's consideration of the Abandonment Areas;
  - c. Explain how Commission approval of CAN DO's Abandonment Areas would impact owners and occupants of parcels included in CAN DO's Abandonment Areas; and
  - d. Explain how Commission approval of CAN DO's requested Abandonment Areas would benefit current and future CAN DO customers.

Answer:

- a. Please see Exhibit A-2A.
- b. Yes, CAN DO has sufficient existing water supply, treatment, storage, and distribution capacity to meet current and projected future customer demands within the Requested Territory. This conclusion is based on system capacity analyses, available source supply, treatment plant rated capacity, and storage volume. The Commission's consideration of the Abandonment Areas does not affect this determination. The Abandonment Areas are largely already served by other utilities or private wells and therefore do not materially impact system demand projections, capacity planning, or infrastructure adequacy for the Requested Territory. The Expansion request is not contingent on the Abandonment request and the Abandonment is not necessary for CAN DO to be able to provide water service to the Requested Territory. CAN DO is not proposing the utilization of additional water sources, nor is it seeking increased withdrawal limits for the Expansion. Rather, CAN DO is proposing to utilize the

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**CAN DO Responses to TUS Data Request Set 1**

existing water supply sources at their current levels as part of its proposed Expansion. This does not preclude, however, CAN DO from continually investigating new water sources to fortify its water supply and fulfill future demand from customers within its existing service territory.

- c. The owners and occupants of parcels included in CAN DO's Abandonment Areas will not be adversely impacted because none of the parcels in the Abandonment Areas currently receives water service from CAN DO. No property will lose access to potable water and so there will be no loss, interruption, or modification of potable water service to any parcels in the Abandonment Areas. Many of the parcels in the Abandonment Area are currently receiving public water service from Hazleton City Authority or have access to public water service from the Hazleton City Authority and most of the others are currently served by private wells. Thus, there is adequate, available water to most of the Abandonment Area.

It has come to our recent attention that, upon information and belief, the parcels shown on Exhibit 8 as receiving service from Aqua Pennsylvania, Inc. ("Aqua") do not receive service from Aqua. No structures are currently located on those parcels. Thus, there currently no need for water service to those parcels from CAN DO. Please see the updated service territory maps at Exhibit A-2B.

CAN DO has never supplied water to the parcels in the Abandonment Area so the abandonment will cause no loss of revenue to CAN DO. CAN DO has never received any requests to serve those parcels. *See also* the answer to A-3, below.

- d. Granting this Application would benefit current customers by allowing CAN DO to focus on streamlined operations and forego maintaining regulatory responsibility for areas it does not serve. This streamlining will benefit current customers by reducing administrative and regulatory overhead. The Abandonment allows CAN DO to unambiguously refine its service territory boundaries, and benefits current and future CAN DO customers by ensuring that CAN DO can focus on maintenance and system improvements within areas that it actually serves. The Abandonment affirmatively benefits the public in a substantial way because it would eliminate overlapping service territories by a public utility and a municipal authority (CAN DO and HCA), which further avoids future operational and regulatory ambiguity. See para. 28 of Amended Application.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

- A-3. In the Amended Application’s Section 28, CAN DO indicated that in the future, if Private Well Parcels request to connect to CAN DO’s water system, CAN DO will evaluate the request and, if it is approved, will file an application to expand its service territory to serve that parcel. Please provide responses to the following:
- a. Explain why CAN DO included the Private Well Parcels in the Abandonment Areas if CAN DO anticipates the potential filing of future applications to expand its service territory to serve parcels that are currently within its certificated service territory;
  - b. Explain if the Private Well Parcels remain as part of CAN DO’s existing service territory, whether there will be any impacts on CAN DO’s ability to provide water service to the Requested Territory and/or the Private Well Parcels; and
  - c. Provide a copy of a revised Abandonment Area Map that removes the Private Well Parcels from the Abandonment Areas along with revised metes and bounds descriptions for each noncontiguous area of land.

Answer:

- a. This data request misinterprets the Application. CAN DO has never received a request to serve any of the Private Well Parcels. Those parcels do not presently need public water service and CAN DO has no reason to believe that they ever will need or request public water service from CAN DO due to the existence of private wells. Therefore, CAN DO does not in fact “anticipate” that there will be a need for it to file an application to expand its service territory to serve the Private Well Parcels in the future.

Nevertheless, the Application acknowledges the possibility that circumstances conceivably could change at some unknown point in the future. In that event, CAN DO will evaluate the situation and reserves the right to file an application to serve one or more of the Private Well Parcels. CAN DO wishes to make clear that, by filing the instant application to abandon, it is not legally precluded from filing an application to serve the Private Well Parcels at some unknown point in the future if circumstances change in a way that warrants such a filing.

- b. There will be no impact. The Private Well Parcels are not currently connected to the system and are not included in demand projections. Any future request for service would be evaluated at that time, including confirmation of available capacity. Accordingly, their continued inclusion in the existing service territory does not affect CAN DO’s ability to provide adequate service to either the Requested Territory or those parcels.

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**CAN DO Responses to TUS Data Request Set 1**

- c. For the map, please see Exhibit A-2B. Please see Exhibit A-3 for revised metes and bounds descriptions for each noncontiguous area of land. CAN DO is in the process of collecting the remaining information and in a supplemental response will provide a copy of a revised Abandonment Area Map that removes the Private Well Parcels from the Abandonment Areas.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Supplemental Answer:**

Please see Exhibit A-3(c) Supplemental, which is a copy of a revised Abandonment Area Map that removes the Private Well Parcels from the Abandonment Areas.

Supplemental Answer provided by: Raiana Nichols, Director of Utilities

Date: March 26, 2026

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**CAN DO Responses to TUS Data Request Set 1**

A-4. Please provide an estimate of the number of customer connections and water usage, by customer class (e.g., commercial, public fire protection, private fire protection, etc.), in the Requested Territory for the first, fifth, and tenth years after Commission approval of the Amended Application.

Answer: Please see below chart.

Years after Commission Approval	Estimated number of customer connections in the Requested Territory	
	Commercial	Industrial
1	0	1 (together with private fire protection, up to 30,000 gpd)
5	0	1 (together with private fire protection, up to 30,000 gpd)
10	0	1 (together with private fire protection, up to 30,000 gpd)

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-5. Please provide an estimate of annual revenues and expenses, by customer class (e.g., commercial, public fire protection, private fire protection, etc.), in the Requested Territory for the first, fifth, and tenth years after Commission approval of the Amended Application.

Answer:

Please see Exhibit A-5.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

- A-6. The Amended Application's Section 24 indicated that CAN DO will charge its existing rates in the Requested Territory, and that the Amended Application's Exhibit 7 included a copy of a *pro forma* tariff (Pro Forma Tariff). However, the Pro Forma Tariff did not clearly identify CAN DO's proposed metered and fire protection service rates. Please provide a revised Pro Forma Tariff that includes the rates CAN DO intends to charge for metered and fire protection services in the Requested Territory and confirm that CAN DO used these rates in its response to Data Request A-5 to estimate its annual revenues.

Answer:

The Application states that CAN DO will charge its existing rates in the Requested Territory. Metered rates and fire protection rates are set forth on Supp. No. 2 Original Pages 10-11, attached as Exhibit A-6.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

- A-7. The Amended Application’s Exhibit 5 included a copy of a letter dated December 19, 2025, from CAN DO to Northpoint Development. In this letter, CAN DO indicated that its water system has adequate capacity to support Northpoint Development’s request of 30,000 gallons per day and that this allotment shall expire if the applicant does not use a reasonable portion of the capacity within 36 months after the date of the letter. Also, CAN DO’s Water Tariff, Rule 17.1 requires that a potential customer who wishes to reserve a certain amount of CAN DO’s water capacity shall be required to enter into an agreement (Take or Pay Agreement) by which CAN DO will be paid a certain minimum amount each month, as determined by CAN DO, regardless of the amount of water received from CAN DO. Please provide responses for each of the following:
- a. Provide a copy of the executed or pro forma Take or Pay Agreement between CAN DO and Northpoint Development and/or the Developer, clarify how CAN DO determined the Take or Pay Agreement rates and terms and explain why the rates and terms are just, reasonable and in the public interest; or
  - b. Explain why Northpoint Development and/or the Developer are not required to enter a Take or Pay Agreement pursuant to CAN DO’s effective tariff.

Answer:

- a. N/A -- there is no executed Take or Pay Agreement with Northpoint Development in connection with the Application.
- b. Rule 17.1 of CAN DO’s Tariff requires a Take or Pay Agreement for a “potential customer who wishes to reserve a certain amount of the Company’s water capacity ....” There is no Take or Pay Agreement because Northpoint Development has not requested to reserve any CAN DO water capacity.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-8. Please provide a breakdown of estimated pipe sizes, material types, and lengths for proposed water mains and service lines, and descriptions and quantities for related land, facilities, and appurtenances (e.g., real estate parcels, meters, fire hydrants, storage tanks, booster stations, etc.).

Answer:

CAN DO is in the process of collecting this information and will provide the description and quantities in a supplemental response.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Supplemental Answer:**

For all proposed infrastructure up to the meter vault, see the chart below. Additional customer-owned infrastructure is not included in the chart.

	<b>Description</b>	<b>Quantity</b>	<b>Units</b>
1	Water Meter Vault (pre-plumbed)	1	EA
2	12" DICL Water Main w/ Valves, Fittings, T.B.	4,560	LF
3	Blow-off Valve & Curb stop	1	EA
4	Tapping Sleeve & Valve	1	EA
5	Domestic Meter (provided by CAN DO)	1	EA
6	Fire Meter (approved by CAN DO)	1	EA

For reference to real estate parcels, please see Exhibit A-8 Supplemental **(CONFIDENTIAL)** for the metes & bounds of the proposed 20-foot wide utility easement.

Supplemental Answer provided by: Raiana Nichols, Director of Utilities

Date: March 26, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-9. The Amended Application's Section 15 indicated that the Developer will be financially responsible for the Main Extension. Please confirm that the Developer will be financially responsible for all facilities identified in CAN DO's response to Data Request A-8 or identify the facilities and costs that will be funded by CAN DO (e.g., water meters, etc.).

Answer:

The Developer will be financially responsible for all facilities identified in CAN DO's response to Data Request A-8 except for the proposed customer's water meter which will be funded by CAN DO.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-10. Please explain how CAN DO will fund its costs for providing water service to the Requested Territory, including costs for water meters (e.g., short-term debt, equity, etc.).

Answer:

CAN DO does not anticipate incurring material upfront capital costs to provide service to the Requested Territory. The only initial utility cost will be for a single water meter. Consistent with the tariff, a deposit equal to 50% of the meter cost will be collected in advance and refunded after one year. The water main extension will be funded entirely by the customer/developer in accordance with the tariff, as the applicant qualifies as a non-bona fide applicant. Accordingly, CAN DO does not expect to rely on short-term debt or equity financing for these facilities.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-11. Please identify any permits, easements, and rights-of-way that will be required to construct the proposed facilities, quantify the cost of those permits, easements, and rights-of-way, and indicate which entity will be responsible for those costs.

Answer:

CAN DO is in the process of collecting this information and will identify any permits, easements or rights-of-way required in a supplemental response.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Supplemental Answer:**

The proposed customer will be responsible for the construction of the Main Extension and obtaining and paying for any and all permits, easements, and rights-of-way that may be required to construct its proposed facilities. CAN DO is unaware of the proposed costs. CAN DO is not aware of the permits that the customer intends to obtain.

Supplemental Answer provided by: Raiana Nichols, Director of Utilities

Date: March 26, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

- A-12. The Amended Application did not include copies of letters from Hazle Township, Sugarloaf Township, West Hazleton Borough, Luzerne County, and Schuylkill County that indicated whether the Amended Application is consistent with adopted municipal and county comprehensive plans and zoning designations. Please provide responses to the following:
- a. Provide evidence that CAN DO sent land use planning consistency verification letters to Hazle Township, Sugarloaf Township, West Hazleton Borough, Luzerne County, and Schuylkill County that requested confirmation of whether the Amended Application is consistent with adopted municipal and county comprehensive plans and zoning designations;
  - b. Provide copies of the responses to CAN DO's land use planning consistency verification letters from Hazle Township, Sugarloaf Township, West Hazleton Borough, Luzerne County, and Schuylkill County; and
  - c. If responses to CAN DO's letters have not been provided by Hazle Township, Sugarloaf Township, West Hazleton Borough, Luzerne County, and Schuylkill County, provide verification of whether the Amended Application is consistent with adopted municipal and county comprehensive plans and zoning ordinances.

Answer:

- a. Exhibit A-12a includes the letters sent to Hazle Township, Sugarloaf Township, West Hazleton Borough, Luzerne County and Schuylkill County.
- b. To date, responses have been received from West Hazleton Borough and Schuylkill County. See Exhibit A-12b. Sugarloaf Township responded by e-mail of February 15, 2026 stating that it did not have enough information to provide a response. CAN DO provided additional information by e-mail of February 16, 2026 and is awaiting a further response from Sugarloaf Township. CAN DO's counsel appeared before the Hazle Township Planning Department on February 17, 2026 regarding the requested letter. The matter will be considered at the Planning Department's next meeting on March 17, 2026. No response has been received yet from Luzerne County. CAN DO will provide a supplemental response after March 17, 2026.
- c. If any additional responses have not been received by the time that CAN DO submits its supplemental response, CAN DO will provide a verification at that time.

Answer provided by: Raiana Nichols, Director of Utilities

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**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

**Supplemental Answer:**

Attached as Exhibit A-12 Supplemental is the response received from the Hazle Township Planning Department, dated March 17, 2026 finding that the Application complies with all applicable requirements of the Township's comprehensive plan and zoning ordinance.

As of this date, no further response has been received from Sugarloaf Township. CAN DO believes that the Application complies with the Sugarloaf Township comprehensive plan and zoning ordinance for the same reasons that it complies with the West Hazleton Borough comprehensive plan and zoning ordinance (*i.e.*, the Application does not propose to locate any public utility facilities in Sugarloaf Township).

As of this date, no response has been received from Luzerne County. Luzerne County does not have jurisdiction over zoning in Hazle Township, Sugarloaf Township, or West Hazleton Borough. <https://www.luzernecounty.org/307/Zoning> The Lackawanna-Luzerne Counties Comprehensive Plan (the "County Comprehensive Plan") can be found at <https://www.luzernecounty.org/281/Planning-Zoning>.

The Application as amended appears to be consistent with the County Comprehensive Plan in that the County Comprehensive Plan advocates for strong community utilities and infrastructure systems to make development more efficient (p. 65). It also advocates for the protection of water resources (p. 84). CAN DO's Application protects the area's water resources by allowing CAN DO to use its existing wells to supply water to a new industrial customer, rather than having that customer develop a well on its property. Further, the County Comprehensive Plan calls for centering new development around existing infrastructure (p. 120). The Application promotes this policy because a short extension of main from CAN DO's existing system would serve a new industrial customer (and would also encourage that customer to locate near other industrial customers). Finally, the County Comprehensive Plan calls for providing adequate infrastructure for industrial centers (pp. 120 and 144). The Application would provide for water infrastructure to an industrial customer where there is currently no such infrastructure.

Supplemental Answer provided by: Raiana Nichols, Director of Utilities

Date: March 26, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-13. Please explain how Commission approval of CAN DO's Requested Territory would benefit current and future CAN DO customers.

Answer:

Commission approval of CAN DO's Requested Territory will provide substantial, direct, and indirect benefits to both existing and future customers. CAN DO's current customers will benefit from the additional revenue associated with an additional user without experiencing rate increases, system degradation, or capacity constraints. The Commission's approval will help make the utility financially stronger by increasing its revenues with minimal capital expenditures, and there is no expected rate increase because the new customer will pay the majority of the costs of the new infrastructure. The developer will directly benefit from the development of domestic water and fire protection service. As set forth in 52 Pa. Code § 69.1501(a), the "coordination and consistent application of safe, adequate and reliable fire protection service offers a tremendous benefit to public safety, emergency fire protection organizations and associated personnel. Safe, reasonable and adequate regulated fire protection service offerings are a matter of utmost concern to the Commission." This is also consistent with the Commission's 2023 Final Policy Statement, adopted on December 21, 2023, which expressly encourages water public utilities to expand, maintain, and improve tariffed fire protection service. Moreover, the Commission's approval of CAN DO's Requested Territory also furthers the overall policy goal of promoting regionalization and consolidation of water systems. *See* Motion of Commissioner Ralph V. Yanora (dated Feb. 6, 2020 ". . . the Commission recognizes that we need to do more to encourage water and wastewater consolidation and regionalization. The Commonwealth Court has also recently acknowledged that consolidation and regionalization of water and wastewater assets are a public benefit to Pennsylvania ratepayers." (citations omitted)). *See also* 52 Pa. Code §§ 69.711 and 69.721.

As set forth in the Application, there are additional public benefits such as increased economic activity, strengthened system capacity, and protection of existing rates and service quality. Other future CAN DO customers will also benefit from a strengthened system performance and ongoing rate stability based on these infrastructure improvements.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-14. The Requested Territory Map identified that several parcels of land in the Requested Territory are part of a subdivision known as the Project Hazelnut Subdivision (Development). Additionally, the Requested Territory Map's Document Reference No. 7 identified a document entitled "Project Hazelnut – Preliminary/Final Major Subdivision" prepared by Vicent J. Stranch, P.L.S. last revised September 4, 2025, which indicated that it was under review by Hazle Township. Please identify the status of the municipal approval of the preliminary and/or final subdivision land use plans for the Development and provide copies of current subdivision plans in electronic vector graphic format along with any associated municipal approval letters.

Answer:

CAN DO is not involved in the Developer's efforts to obtain municipal approval of subdivision and land use plans. Nevertheless, based on newspaper reports and court filings, it is CAN DO's understanding that the Developer is currently involved in litigation with Hazle Township regarding municipal approval of the Development. CAN DO will provide additional information in a supplemental response.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Supplemental Answer:**

Please see Exhibit A-14 (**CONFIDENTIAL**), which includes a copy of the preliminary subdivision plan.

Supplemental Answer provided by: Raiana Nichols, Director of Utilities

Date: March 26, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-15. If municipal approval of subdivision land use plans for the Development have not been granted by Hazle Township, Sugarloaf Township, and West Hazleton Borough, provide the Developer's timeline for requesting and receiving municipal approval of the Development from each municipality.

Answer:

CAN DO is not involved in the Developer's efforts to obtain municipal approval of subdivision and land use plans and has no information regarding its timeline for requesting and receiving municipal approvals. *Also see* the Answer to A-14.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-16. Please clarify the status of the municipal approval of the preliminary and/or final subdivision land use plans for the remaining area (Outside Development Area) outside of the Development included in CAN DO's Requested Territory and provide copies of current subdivision plans in electronic vector format along with any associated municipal approval letters.

Answer:

CAN DO is not involved in the Developer's efforts to obtain municipal approval of subdivision and land use plans and, other than what was provided above, has no information regarding the status of municipal approvals.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-17. If municipal approval of subdivision land use plans for the Outside Development Area has not been provided by Hazle Township, Sugarloaf Township, and West Hazleton Borough, provide the Developer's timeline for requesting and receiving municipal approval of subdivision land use plans for the Outside Development Area included in CAN DO's Requested Territory from each municipality.

Answer:

CAN DO is not involved in the Developer's efforts to obtain municipal approval of subdivision and land use plans and has no information regarding its timeline for requesting and receiving municipal approvals.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-18. Please state whether CAN DO has contacted each public utility, municipality and municipal authority that operates a public water system that is within one mile of CAN DO's Requested Territory (e.g., Aqua Pennsylvania, Inc., Hazleton City Authority, etc.) to determine whether other public water suppliers are willing and able to provide water service in the Requested Territory and identify each public water supplier that has expressed interest in providing water service in the Requested Territory.

Answer:

CAN DO's original Application and its amended application were served on each public utility, municipality and municipal authority that operates a public water system within one mile of the Requested Territory. None of these public water suppliers Protested or filed a Notice of Intervention in response to the Application. CAN DO submits that this is evidence that none of these public water suppliers is interested in providing water service in the Requested Territory.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-19. Please provide evidence that, when considering both the cost of service and the quality of service, future customers in the Requested Territory would be better served by CAN DO than other public water suppliers.

Answer:

CAN DO's response is not intended to disparage any other public water suppliers. The Developer approached CAN DO requesting service and had the option to contact other public water suppliers if it believed another public water supplier could provide less expensive or better quality service.

As stated in the answer to A-18, no other public water supplier has expressed interest in providing domestic water service and fire protection service to the Requested Territory. CAN DO is a certificated public utility with the legal, financial and technical fitness to provide the requested service to the Requested Territory. CAN DO's rates have been approved by the Commission as just and reasonable. No formal complaints have been filed at the Commission during the last five years regarding CAN DO's service.

CAN DO has the closest existing infrastructure to the Requested Territory, which will result in lower construction costs, faster deployment, and reduced long-term operational costs for customers in the Requested Territory. As set forth in the Amended Application, CAN DO will charge its existing rates in the Requested Service Territory, which means that future customers in the Requested Territory will be treated as all existing customers are treated. Amended Application at para. 24.

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Application of Greater Hazleton Community-Area New Development Organization, Inc. t/a CAN DO, Inc. for approval of the right to: (1) offer, render, furnish or supply water service to the public in an additional portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County, Pennsylvania; and (2) abandon water service to the public in portions of Hazle Township, Luzerne County, Pennsylvania, and East Union Township, Schuylkill County, Pennsylvania at Docket No. A-2026-3059809**

**CAN DO Responses to TUS Data Request Set 1**

A-20. Provide a map of suitable scale that depicts the location or route of CAN DO's existing water distribution system, and that identifies pipe sizes and material types for water mains.

Answer:

Please see Exhibit A-20 (**CONFIDENTIAL**).

Answer provided by: Raiana Nichols, Director of Utilities

Date: March 5, 2026

**Greater Hazleton Community Area New  
Development Organization Inc.  
t/a CAN DO, Inc. (Water Division)  
Docket No. A-2026-3059809**

**Exhibit A-3(c) Supplemental  
(Map excluding Private Wells,  
Hazle Township and East Union Township)**



**Greater Hazleton Community Area New  
Development Organization Inc.  
t/a CAN DO, Inc. (Water Division)  
Docket No. A-2026-3059809**

**Exhibit A-12 Supplemental  
(Hazle Township Planning Confirmation)  
March 17, 2026**



January 23, 2026

**VIA FIRST CLASS MAIL**

**Jonathan P. Nase**  
Direct Phone 717-773-4191  
Direct Fax 215-372-2340  
jnase@cozen.com

Hazle Township Planning Department  
P.O. Box 506  
Harleigh, PA 18225

**Re: Application of CAN DO at the Pennsylvania Public Utility Commission, Docket Nos. A-2026-3059809 and A-2026-3059810**

Dear Sir or Madam:

This letter concerns a project in your area by the Greater Hazleton Community Area New Development Organization Inc. t/a CAN DO, Inc. (Water Division) ("CAN DO"). On January 13, 2026, CAN DO submitted its Application to the Pennsylvania Public Utility Commission for Approval of (a) the Right to Offer, Render, Furnish or Supply Water Service to the Public in an Additional Portion of Hazle Township, together with portions of Sugarloaf Township and West Hazleton Borough, Luzerne County Pennsylvania, and (2) the Abandonment of Portions of its Water Service Territory in Hazle Township, Luzerne County, Pennsylvania and East Union Township, Schuylkill County, Pennsylvania (the "Application"). A copy of this Application was sent to you previously and is also available upon request.

Per 52 Pa. Code § 3.514(a)(4)(ii)(E), CAN DO is required to request a letter from an authorized representative of the Township indicating whether CAN DO's proposal complies with applicable requirements (if any) of municipal comprehensive plans and zoning ordinances.

If you can confirm that CAN DO's proposed abandonment of service and expansion of service meets all applicable requirements of Hazle Township's comprehensive plans and zoning ordinances, please sign the statement under Option 1 on the attached page and return it to me. If you believe that CAN DO's proposal does not comply with all applicable requirements of Hazle Township's comprehensive plans and zoning ordinances, please provide an explanation under Option 2 on the attached page and return it to me.

If you have any questions, please contact me at (717) 979-2677 or [jnase@cozen.com](mailto:jnase@cozen.com). Please submit your response no later than February 14, 2026 so that CAN DO can supply the requested information to the Pennsylvania Public Utility Commission as required by 52 Pa. Code § 3.514(a)(4)(ii)(E).

Thank you for your cooperation in this matter.

Sincerely,

COZEN O'CONNOR

By: Jonathan P. Nase

JPN:kmg

**Option 1: Confirmation**

CAN DO's proposed abandonment of service to portions of its existing service territory in Hazle Township, and its proposed expansion of service to an additional portion of Hazle Township, is consistent with all applicable requirements of Hazle Township's comprehensive plans and zoning ordinances.

Date: 3/17/2026

By: John G. Synoski

Name: John G. Synoski

Title: Planning Director

Hazle Township Planning Department

**Option 2: Explanation**

If you believe that the abandonment of service and/or expansion of service does not meet all applicable requirements of Hazle Township's comprehensive plans and zoning ordinances, please provide a brief explanation below. You may submit additional pages as needed.

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Date: \_\_\_\_\_

By: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Hazle Township Planning Department