

March 29, 2026

Via Electronic Filing
Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Application of CAN DO, Inc. (Water Division) for approval of Expansion of Water Service Territory and Abandonment of Portions of Existing Service Territory in Hazle Township, Sugarloaf Township, West Hazleton Borough, and East Union Township; Docket No. A-2026-3059809, et al.

Opposition to CAN DO, Inc.'s Supplemental Answers to Bureau of Technical Utility Services Data Requests, Set 1 (Nos. 1-20), Docket No. A-2026-3059809, submitted by Lisa Logan, Pro Se Protestant

Dear Secretary Homsher,

Please accept for filing the enclosed Opposition to CAN DO, Inc.'s Supplemental Answers to Bureau of Technical Utility Services Data Requests, Set 1 (Nos. 1-20), submitted by Pro Se Protestant Lisa Logan.

This filing is submitted in response to the supplemental answers filed by CAN DO, Inc. on March 26, 2026. The purpose of the Opposition is to identify areas where additional information, clarification, or supporting documentation may be necessary for a complete evaluation of the Application under 66 Pa. C.S. § 1103(a) and the Commission's applicable regulations. The issues addressed include land-use coordination, public necessity, technical information, mapping accuracy, and potential impacts on water resources.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

Lisa Logan

Lisa Logan
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Sugarloaf, PA 18249
Lisalogan2662@gmail.com | 727.247.3036

Enclosure(s)

cc: Administrative Law Judge Emily A. Farren via email efarren@pa.gov
Administrative Law Judge Steven K. Haas via email sthaas@pa.gov

**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 and East Union :
Township, Schuylkill County, Pennsylvania :

CERTIFICATE OF SERVICE

I hereby certify that I have this 29th day of March, 2026 filed electronically on the Commission's electronic filing system and served a true copy of the foregoing Opposition to CAN DO, Inc.'s Supplemental Answers to Bureau of Technical Utility Service Data Requests, Set 1 (Nos. 1-20), Docket No. A-2026-3059809, submitted by Lisa Logan, Pro Se Protestant 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).

Service Via E-mail and First-Class Mail

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Respectfully submitted,



Lisa Logan
Pro Se Protestant

**BEFORE THE
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County, Pennsylvania and East Union :
Township, Schuylkill County, Pennsylvania :

**OPPOSITION TO CAN DO, INC.'S SUPPLEMENTAL ANSWERS TO BUREAU OF
TECHNICAL UTILITY SERVICES DATA REQUESTS, SET 1 (NOS. 1-20) SUBMITTED BY
LISA LOGAN, PRO SE PROTESTANT**

I, Protestant Lisa Logan, appearing pro se, respectfully submit this Opposition in response to CAN DO, Inc.'s Supplemental Answers to Bureau of Technical Utility Services Data Requests, Set 1 (Nos. 1-20), filed on March 26, 2026. These answers raise new factual issues and reveal deficiencies that materially affect the evaluation of the Application under 66 Pa. C.S. § 1103(a). I, Protestant Lisa Logan file this Opposition to ensure the record accurately reflects my position and to preserve all rights raised in my Protest and at the Prehearing Conference held on March 25, 2026.

I. LAND-USE AND MUNICIPAL COORDINATION REMAIN UNRESOLVED

CAN DO repeatedly states it does not know the status of the developer's land use approvals, subdivision plans, or municipal permitting. Multiple municipalities have not responded, and Hazle Township is in active litigation with the developer.

Under 52 Pa. Code §§ 3.501 and 3.514, an applicant must demonstrate land use consistency and provide evidence of municipal coordination. Exhibit A-12 contradicts Hazle Township's binding land-use denial; the individual that signed this document acted outside their powers. Hazle Township denied the land-use application for the NorthPoint Project Hazelnut project on November 14, 2025. The developer appealed that denial on

December 12, 2025, and the appeal remains in active litigation. Under the Pennsylvania Municipalities Planning Code (MPC):

- A municipal denial remains fully effective unless reversed by a court.
- No municipal employee may issue a document that contradicts the governing body's adjudication. Therefore, the Planning Director's March 17, 2026 signature is beyond the scope of his legal authority. It attempts to certify "consistency" where the Township has already determined inconsistency. This makes Exhibit A-12 invalid from the beginning.

II. PUBLIC CONVENIENCE AND NECESSITY HAS NOT BEEN DEMONSTRATED

CAN DO's projections reflect:

- One potential industrial customer in Years 1, 5, and 10
- No residential customers
- No documented fire protection need

Furthermore, Exhibits 1-A, 1-B, and I-C are mine maps that show abandoned mine workings and subsurface voids within or adjacent to the proposed service area. CAN DO did not disclose these potential hazards, did not provide geotechnical analysis, and did not demonstrate that the project can be safely constructed. This is a failure of technical fitness and engineering feasibility. A project that may be unsafe, unstable, or physically infeasible cannot satisfy the public convenience and necessity standard under 66 Pa. C.S. §1103. The application appears incomplete, inaccurate, or flawed in that it fails to meet the legal and technical standard in a meaningful way and therefore should not be approved.

Lastly, the Bureau of Technical Utility Services requested that CAN DO "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." CAN DO references Exhibit A-5 in their answer and it appears Exhibit A-5 was not listed in their confidential submissions nor submitted with their Supplemental Answers on March 26, 2026.

III. TECHNICAL INFORMATION REMAINS INCOMPLETE

The Supplemental Answers state that CAN DO is still gathering essential engineering and infrastructure information, including:

- Pipe sizes, materials, and lengths

- Required permits, easements, and rights of way
- Final metes and bounds for the proposed corridor and easement
- Missing exhibits

Without this information, it is difficult to assess technical fitness or confirm that the proposed facilities meet Commission standards.

IV. THE ABANDONMENT REQUEST LACKS SUPPORTING EVIDENCE

CAN DO acknowledges that:

- It has not served the parcels proposed for abandonment
- It cannot confirm whether certain parcels are served by another utility
- It has not demonstrated a public benefit associated with abandonment
- It seeks to reshape its territory for the convenience of a private developer

Abandonment requires affirmative evidence that the public interest will be served. The supplemental responses do not provide such evidence.

V. MAPPING AND BOUNDARY ISSUES PERSIST

The Supplemental Answers confirm that mapping revisions are ongoing and that certain parcel identifications were inaccurate. Accurate, verified mapping is necessary for the Commission to evaluate the scope of the requested expansion and abandonment.

VI. ENVIRONMENTAL AND WATER RESOURCE CONSIDERATIONS ARE NOT ADDRESSED

CAN DO states it will rely on existing wells and may “continually investigate new water sources,” yet provides:

- No hydrogeologic analysis
- No DEP coordination
- No cumulative impact assessment
- No evaluation of effects on private wells within the watershed

As a private well owner within the affected hydrologic area, I, Lisa Logan, have a direct, immediate, and substantial interest in ensuring that water withdrawals do not impair recharge, yield, or quality.

The absence of environmental analysis is a critical deficiency under Article I, Section 27 and the Commission’s public interest obligations.

VII. PUBLIC INTEREST CONSIDERATIONS

Based on the supplemental information, several issues remain unresolved, including:

- No public need
- No municipal support
- No environmental safeguards
- No technical completeness
- No verified mapping
- No evidence that CAN DO is the appropriate provider
- A single private beneficiary

The Public Utility Code requires the Commission to protect communities, natural resources, and the integrity of public utility service. These factors may affect the Commission's ability to determine whether the Application meets the public interest standard required under the Public Utility Code.

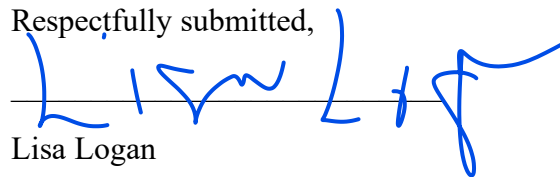
VIII. RELIEF REQUESTED

For the reasons stated above, I respectfully request that the Commission:

1. Give full consideration to the deficiencies revealed in CAN DO's Supplemental Answers, and
2. Deny the Application unless and until CAN DO provides complete, verified, and legally sufficient evidence demonstrating public convenience and necessity, technical fitness, land use consistency, and environmental protection.

I, Lisa Logan, Pro Se Protestant reserve all rights to submit additional filings, testimony, and evidence as the proceeding continues.

Respectfully submitted,



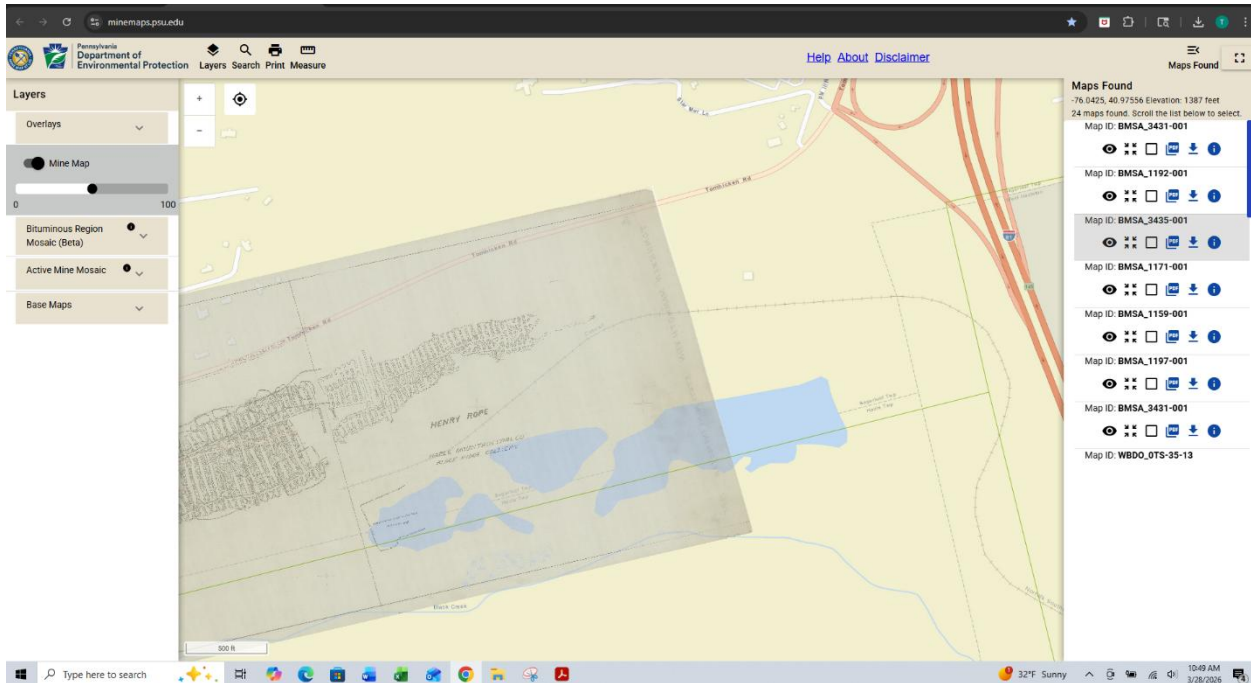
Lisa Logan
Pro Se Protestant

EXHIBIT 1-A



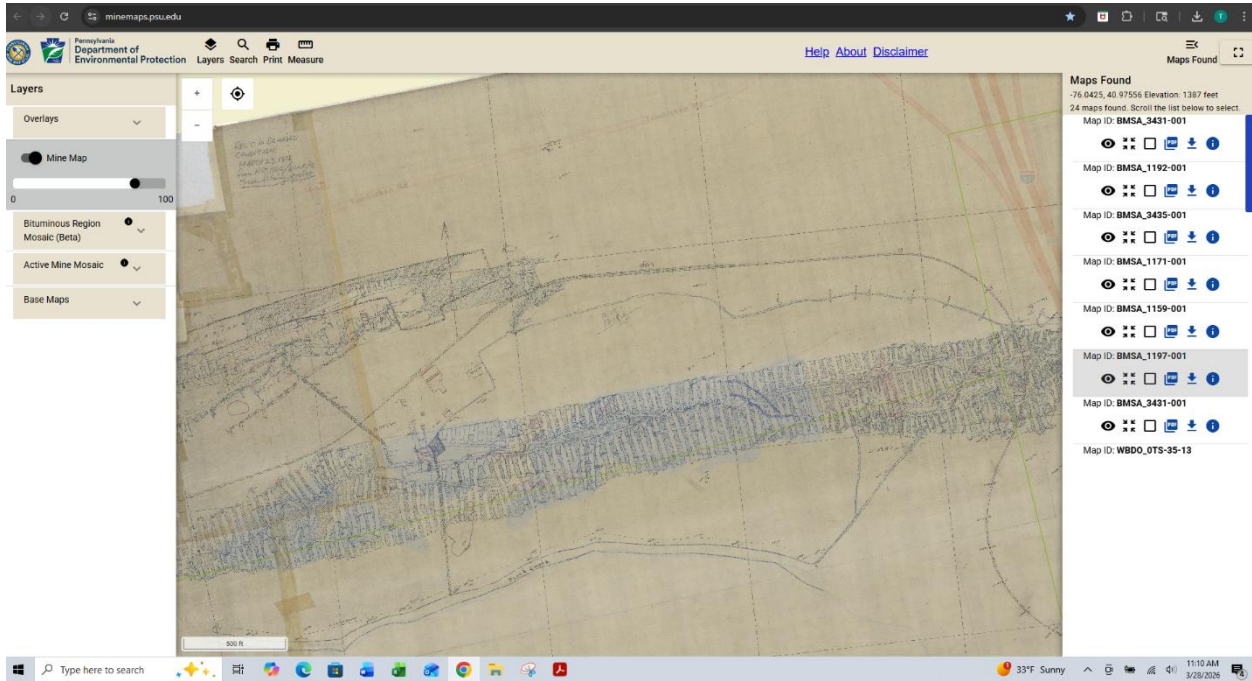
DEP Map ID: BMSA_1171-001

EXHIBIT 1-B



DEP Mine Map ID: BMSA_3435-001

EXHIBIT 1-C



DEP Mine Map ID: BMSA_1197-001