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September 25, 2026

VIA ELECTRONIC FILING

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

***Re: Application of Veolia Water Pennsylvania, Inc. for approval of the
right to acquire certain real estate in Upper Allen Township,
Cumberland County, Pennsylvania
Docket No. A-2026-3063219***

Dear Secretary Homsher:

Enclosed please find Upper Allen Township's Motion for Reconsideration for filing in the above-referenced matter. Copies have been served upon all interested parties of record.

Very truly yours,

A handwritten signature in blue ink that reads "Joshua D. Bonn".

Joshua D. Bonn

JDB:ino
Enclosure
cc: All Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Veolia Water Pennsylvania,	:
Inc. for approval of the right to acquire	: Docket No. A-2026-3063219
certain real estate in Upper Allen Township,	:
Cumberland County, Pennsylvania	: Electronically Filed
	:

MOTION FOR RECONSIDERATION

Upper Allen Township (“Township”), by and through its counsel, Cohen Seglias Pallas Greenhall & Furman PC, hereby files this Motion for Reconsideration of the Pennsylvania Public Utility Commission’s (“Commission”) Order entered and adopted on September 10, 2026 in the above-referenced matter, and in support thereof avers the following:

1. By the application (Application) filed with the Pennsylvania Public Utility Commission (Commission) on June 12, 2026, Veolia Water Pennsylvania, Inc. (Veolia), seeks a certificate of public convenience (CPC) pursuant to Section 1102(a)(3) of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 1102(a)(3), evidencing Commission approval of Veolia’s right to acquire certain real estate in Upper Allen Township, Cumberland County, Pennsylvania, for the purpose of erecting an elevated water storage tank (Tank).
2. On August 31, 2026, Veolia agreed to appear and did appear at the Township’s Planning Commission meeting to discuss the erection of the Tank.
3. Due to unforeseen circumstances, Veolia’s engineer was unable to appear at the Township Planning Commission meeting, and Veolia’s representatives were unable to address certain concerns raised by the Township Planning Commission, Township staff, and Township residents including but not limited to the location of the Tank, setbacks, screening, disturbance of trees, site access, and impact on Township residents.

4. The Township has yet to receive a copy of the construction plans for the Tank and therefore has been unable to fully consider the impact of the Tank on nearby residents and the community as a whole and conformity with the Township's zoning ordinance and comprehensive plan.

5. Veolia and Township counsel have engaged in frequent communication regarding the Township's concerns and Veolia's responses thereto and believe that an agreement resolving the Township's concerns is imminent.

6. Both parties have been working diligently towards a resolution, but due to the Pennsylvania Sunshine Act, the Township Commissioners cannot formally resolve their concerns with Veolia regarding the erection of the Tank prior to the Commissioner's regular business meeting on October 7, 2026.

7. On September 10, 2026, the PUC Commissioners entered an order addressing the Application, and providing in part:

That Veolia Water Pennsylvania, Inc. shall file with the Commission's Secretary's Bureau at Docket No. A-2026-3063219 a copy of approval letters from Upper Allen Township for the land development plan and conditional use permit for the construction of the elevated water storage tank and related facilities upon the land subject to the Easements, or a verified letter from Veolia Water Pennsylvania, Inc., with proof of service of the letter upon Upper Allen Township, that specifies that the construction of the elevated water storage tank and related facilities upon the land subject to the Easements does not require land development plan approval and a conditional use permit from Upper Allen Township.

Order dated September 10, 2026, p. 9, ¶ 2.

8. The deadline to file a motion for reconsideration of the PUC Commissioner's order is September 25, 2026.

9. The Township has enacted zoning ordinances regulating public utility buildings and structures. Upper Allen Township Zoning Code § 245-14.52 (available at <https://ecode360.com/8577949>).

10. Although the Township's zoning ordinances as applied to the erection of the Tank may be preempted by state law, state regulations provide that when reviewing applications for CPCs, the Commission "will consider the impact of its decisions upon local comprehensive plans and zoning ordinances" for the purpose of "further[ing] the State's goal of making State agency actions consistent with sound land-use planning." 52 Pa. Code § 1101.

11. Thus, the Township requests that the PUC reconsider its order dated September 10, 2026, to ensure that the erection of the Tank is consistent with the Township's zoning ordinance, comprehensive plan, and sound land-use planning.

12. Due to the parties' ongoing good faith negotiations, the Township believes this request for reconsideration will likely be resolved at the Township Commissioner's public meeting on October 7, 2026, but the Township files this motion primarily as a protective measure due to the September 25, 2026 deadline to request reconsideration.

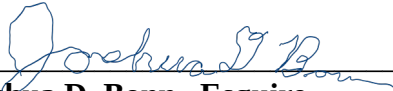
13. If Veolia sufficiently addresses the Township's concerns and an agreement is adopted at the Township's October 7, 2026 meeting, the Township intends to withdraw this request for reconsideration and raise no further objection to the issuance of the CPC.

14. Based on the circumstances described above, the Township requests that the PUC wait until at least October 8, 2026 to address this motion or to enter any case management deadlines, to give the parties time to continue negotiating in good faith and to avoid expense and administrative burden that would arise from a prompter ruling.

WHEREFORE, Upper Allen Township respectfully requests the Commission reconsider its order dated September 10, 2026 to ensure that the erection of the Tank is consistent with the Township's zoning ordinance, comprehensive plan, and sound land-use planning.

Respectfully submitted,

**COHEN SEGLIAS PALLAS
GREENHALL & FURMAN, PC**

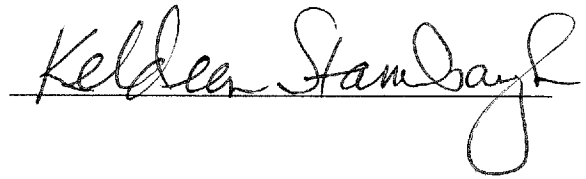
By: 
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Solicitor for Upper Allen Township

Date: September 25, 2026

VERIFICATION

I, Keldeen Stambaugh, Manager of Upper Allen Township, make the following statement subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authority, and do state that as Manager for Upper Allen Township, I am authorized to make this statement on behalf of Upper Allen Township, and that the facts set forth in the foregoing “**Motion for Reconsideration**” are true and correct to the best of my knowledge, information and belief.



Date: September 25, 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Veolia Water Pennsylvania, Inc. for approval of the right to acquire certain real estate in Upper Allen Township, Cumberland County, Pennsylvania	: : : : :	Docket No. A-2026-3063219 Electronically Filed
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the participants listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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/s/ Ijeoma Okereke

Ijeoma Okereke, Legal Assistant

Date: September 25, 2026