



GOVERNOR'S OFFICE OF GENERAL COUNSEL
DEPARTMENT OF ENVIRONMENTAL PROTECTION

October 5, 2026

VIA ELECTRONIC FILING

Administrative Law Judge John M. Coogan
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
jcoogan@pa.gov

Re: I&E Petition to Request the Commission Open a Section 529 Investigation
into the Acquisition of Rock Spring Water Company, Docket No. P-2024-3051313

Dear Judge Coogan:

Enclosed please find the Department of Environmental Protection's Comments on Pennsylvania American Water Company's Plan for Improvements for Rock Spring Water Company. Copies are being served on all parties of record per the attached Certificate of Service.

Should you have any questions, please do not hesitate to contact me at (570) 321-6568 or achaplin@pa.gov.

Sincerely,

Amanda K. Chaplin
Assistant Counsel

Enclosures (Comments on Pennsylvania American Water Company's Plan for Improvements
for Rock Spring Water Company)

c: Matthew L. Homsher, PUC Secretary
Parties

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
Bureau of Investigation & Enforcement	:	
Petition to Request the Commission Open	:	P-2024-3051313
Section 529 Investigation into the	:	
Acquisition of Rock Spring Water Company	:	

**COMMONWEALTH OF PENNSYLVANIA,
DEPARTMENT OF ENVIRONMENTAL PROTECTION’S
COMMENTS ON PENNSYLVANIA AMERICAN WATER COMPANY’S PLAN
FOR IMPROVEMENTS FOR ROCK SPRING WATER COMPANY**

AND NOW, comes the Commonwealth of Pennsylvania, Department of Environmental Protection (“Department”), by and through its undersigned counsel, under Section 529(j) of the Public Utility Code, 66 Pa. C.S. § 529(j), and respectfully submits the following Comments on Pennsylvania American Water Company’s Plan for Improvements for Rock Spring Water Company:

1. Under Paragraph IV., Source of Supply: the source rated capacity, permitted capacity, and safe yield capacity should state 230 gpm.
2. Under Paragraph IV., Source of Supply: the narrative should address any necessary Susquehanna River Basin Commission (“SRBC”) approval of the source.
3. Under Paragraph VI.A., System Deficiencies, Distribution System: the narrative should address the new waterline to the storage tank.
4. Under Paragraph VI.A, System Deficiencies, Distribution System: the narrative should address the need for long-term mitigation of unaccounted-for water loss and the entering into a Consent Order and Agreement with the Department to bring the public water system back into compliance with the Safe Drinking Water Act, Act of May 1, 1984, P.L. 206, *as amended*, 35 P.S. § 721.1-721.17 (“Safe Drinking Water Act”), and the Department’s rules and regulations.

5. Under Paragraph VI.B., System Deficiencies, Storage and Fire Protection: the narrative should address how fire flow inadequacies, including less than 6-inch diameter mains with hydrants, will be addressed.

6. Under Paragraph VII., Capital Improvement Plan Costs: this section should identify when year one begins (e.g., upon closing or acquisition).

7. Under Paragraph VII., Capital Improvement Plan Costs: the terms “IP” and “RP” in the two tables should be defined.

WHEREFORE, the Department respectfully requests that this Honorable Commission consider the Department’s Comments on Pennsylvania American Water Company’s Plan for Improvements for Rock Spring Water Company in this matter.

Respectfully Submitted,

COMMONWEALTH OF PENNSYLVANIA,
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

/s/Amanda Chaplin
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Date: October 5, 2026

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
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Acquisition of Rock Spring Water Company :

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing Department's Comments on Pennsylvania American Water Company's Plan for Improvements for Rock Spring Water Company, via electronic mail upon the persons listed below:

SERVED VIA ELECTRONIC MAIL ON OCTOBER 5, 2026

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Rod Beard, Esquire Beard Law Company 101 N Allegheny Street Bellefonte, PA 16823 rod@beardlawco.com (Counsel for Rock Spring Water Company)	The Honorable John Coogan Administrative Law Judge Pennsylvania Public Utility Commission 400 North Street Commonwealth Keystone Building Harrisburg, PA 17120 jcoogan@pa.gov
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COMMONWEALTH OF PENNSYLVANIA,
DEPARTMENT OF ENVIRONMENTAL
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