PENNSYLVANIA AMERICAN WATER

Elizabeth Rose Triscari
Senior Counsel
852 Wesley Drive | Mechanicsburg, PA 17055
Phone: 717-550-1574
elizabeth.triscari@amwater.com

November 2, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

In 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 Secretary Homsher:

Pursuant to Ordering paragraph 13, of the Commission's Opinion and Order entered June 4, 2026, in the above-referenced proceeding, please find attached Pennsylvania-American Water Company's Revised Plan for Improvements ("Revised Plan") of Rock Spring Water Company and a redline showing changes from the initially filed plan. This Revised Plan accepts and incorporates all Comments submitted by the Pennsylvania Department of Environmental Protection.

If you should have any questions, please feel free to contact me.

Sincerely,

Elizabeth Rose Triscari

Elizabeth Rose Triscari

cc: The Honorable Administrative Law Judge John M. Coogan *(via electronic mail)*
Paul Diskin, Director – Bureau of Technical Utility Services *(via electronic mail)*
All Parties on the Attached Certificate of Service (*via electronic mail)*

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
Bureau of Investigation and Enforcement	:	
Petition to Request the Commission Open	:	Docket No. P-2024-3051313
A Section 529 Investigation into the	:	
Acquisition of Rock Spring Water Company	:	

CERTIFICATE OF SERVICE

I hereby certify that on this day I am serving the above-referenced **Revised Plan for Improvement** upon people and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

SERVED VIA ELECTRONIC MAIL ON NOVEMBER 2, 2026

Robert A. Mix, Esquire Robert Mix Law 211 Kimport Avenue Boalsburg, PA 16827 E-mail: Bmix470@gmail.com Counsel for State College Borough Water Authority	Melanie Joy El Atieh, Esquire Jacob D. Guthrie, Esquire Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 Email: OCARockSpring@paoca.org Counsel for the Office of Consumer Advocate
Amanda Chaplin, Esquire Pennsylvania Department of Environmental Protection Northcentral Regional Office 208 West Third Street, Suite 101 Williamsport, PA 17701 E-mail: achaplin@pa.gov E-mail: gmasser@pa.gov Counsel for the Pennsylvania Department of Environmental Protection	Elizabeth A. Dupuis, Esquire Morgan M. Madden, Esquire Babst, Calland, Clements & Zomnir, P.C. 330 Innovation Blvd., Suite 302 State College, PA 16803 Email: bdupuis@babstcalland.com E-mail: mmaden@babstcalland.com Counsel for Ferguson Township
Carrie B. Wright, Esquire Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120 E-mail: carwright@pa.gov Counsel for the Bureau of Investigation and Enforcement	Rebecca Lyttle, Esquire Steven Gray, Esquire Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101 E-mail: relyttle@pa.gov E-mail: sgray@pa.gov Counsel for Office of Small Business Advocate

Alexander R. Stahl, Esquire Aqua Pennsylvania, Inc. 762 W. Lancaster Avenue Bryn Mawr, PA 19010 E-mail: astahl@aquaamerica.com Counsel for Aqua Pennsylvania, Inc.	Rod Beard, Esquire Beard Law Company 101 N. Allegheny Street Bellefonte, PA 16823 E-mail: rod@beardlawco.com Counsel for Rock Spring Water Company
David S. Gaines, Jr. MILLER, KISTLER & CAMPBELL 720 South Atherton Street, Suite 201 State College, PA 16801 E-Mail dgaines@mkclaw.com Counsel for State College Borough Water Authority	David P. Zambito, Esquire Jonathan P. Nase, Esquire Cozen O'Connor 17 North Second Street, Suite 1410 Harrisburg, PA 17101 Phone: (717) 703-5892 E-mail: dzambito@cozen.com E-mail: jnase@cozen.com

Respectfully submitted,



_____

Elizabeth Rose Triscari, Esquire (PA ID #306921)
Teresa K. Harrold, Esquire (PA ID #311082)
Erin K. Fure, Esq. (PA ID No. 312245)
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
Telephone (717) 550-1556
E-mail: elizabeth.triscari@amwater.com
E-mail: teresa.harrold@amwater.com
E-mail: erin.fure@amwater.com

Counsel for Pennsylvania-American Water Company

Date: November 2, 2026

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

Pennsylvania-American Water Company Plan for Improvement

(REDLINED VERSION)

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

REVISED PLAN FOR IMPROVEMENTS FOR ROCK SPRING WATER COMPANY

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I. GENERAL

On February 18, 2026, Administrative Law Judge John M. Coogan entered a Recommended Decision at Docket Nos. P-2024-3051313, which was adopted by the Pennsylvania Public Utility Commission ("Commission") by order dated June 4, 2026 ("Order"), directing Pennsylvania-American Water Company ("PAWC") to acquire the assets of the Rock Spring Water Company ("RSWC"). The Order further directs PAWC to file its Plan for Improvements within three months of the date of entry of the Order. RSWC is located in Ferguson Township, Centre County, Pennsylvania. The system consists of one well, one treatment building, and one storage tank that provides service to approximately 458 residential customers and two public customers. There are no industrial users on the system.

II. DISTRIBUTION SYSTEM

The distribution system contains approximately 23 miles of pipe, and the system operates on a single gradient. The distribution system piping ranges in size from 1-inch to 6-inch diameter pipe.

Table 3

Size (inch)	Material	Length (ft)
1	Copper/Galvanized	9,000
2	Copper/Galvanized	3,000
4	Transite	90,000
6	PVC	22,500

III. STORAGE AND FIRE PROTECTION

The RSWC has a 212,000-gallon storage tank located on a hill on the southern end of the distribution system. A security fence is provided for the storage tank. The owner stated that the RSWC does not own the land associated with the storage tank, nor are there easements for the tank. The RSWC has an agreement with Penn State's Agricultural Progress (AG Progress), who owns the property that RSWC may use the property providing AG Progress receives free water for the two events they host each summer at the site.

There ~~are~~is a total of 28 fire hydrants in the system. Only one hydrant is located on a 6-inch water main~~,~~; the other 27 hydrants are located on 4-inch mains.

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

IV. SOURCE OF SUPPLY

The RSWC is a ground water well system that has only one well. The well has a rated capacity of 0.331 mgd. The well is located approximately 100 feet from Tadpole Road adjacent to a large, wooded area. The original source of supply for the system was ~~the~~ Shall's Gap Run Reservoir. Over time this source was abandoned and was disconnected from the water system in the early 1990's. The only well ~~was~~ for the system was constructed in the 1960's. The well has an 8-inch diameter casing and was drilled to a depth of 322 ft with a casing depth of 126 feet. The well pump has been replaced after the Receivership started. The well capacities are identified below:

Source Rated Capacity (~~mgd~~GPM)	~~0.331~~ 230
Permitted Capacity (~~mgd~~GPM)	~~0.331~~ 230
Safe Yield Capacity (~~mgd~~GPM)	~~0.331~~ 230

SRBC regulates withdrawals of 100,000 gallons per day (gpd) or more, based on a consecutive 30-day average. PAWC has met with the SRBC officials to discuss the system and the process of moving forward with SRBC permitting. Once PAWC owns the RSCW system PAWC will file for SRBC permitting as required.

V. PRODUCTION

The production for the RSWC system is currently from one well adjacent to the small treatment building. The ground water is chlorinated via an injection point in the raw water line located in a pit outside the well building prior to the partially buried clearwell. The existing treatment building is a small block building that is in poor condition. Two centrifugal pumps arranged in parallel draw suction from the clearwell and discharge into 900 feet of 12-inch PVC pipe for additional contact time prior to entering the distribution system. Only one centrifugal pump operates at a time while the other is available as a backup. The well pump is controlled by the elevation of the clearwell. The two centrifugal pumps ~~that~~ are controlled by the level ~~in~~of the storage tank located approximately 4.5 miles away in the distribution system. The control system uses cellular communication between the storage tank and the treatment building to control the centrifugal pump operation. ~~The two 320 gpm centrifugal pumps are equipped with variable frequency drives (VFDs). The VFDs are used to control the pumping capacity to match the production capacity of the well.~~ There are two 320gpm centrifugal booster pumps on soft starters.

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Sodium hypochlorite is used as a disinfectant. The sodium hypochlorite system is located in a dedicated chemical room within the treatment building. A single chemical metering pump discharges sodium hypochlorite from the day tank into the injection point.

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

VI. SYSTEM DEFICIENCIES

A. Distribution System

The distribution system consists of small diameter mains that do not comply with the Pennsylvania DEP Water Supply Manual for Public Water Supply Systems that ~~requires~~require mains to be no smaller than 3-inch in diameter. PAWC has experienced that small diameter mains result in increased NRW~~ and has initiated a small diameter main replacement program.~~. A small diameter main replacement program will be initiated to replace the 12,000 feet of 1 and 2-inch small diameter mains located in the system. ~~A comprehensive~~Comprehensive leak ~~survey~~detection/surveys are ongoing and will ~~be conducted~~continue after the sale to identify problem areas in the distribution system.

~~The system currently does not have a service line inventory and will require funding from the~~PAWC also plans to replace the water main from the well to the water storage tank as part of the comprehensive water main replacement program to improve system reliability. As old and leaking pipes are replaced, this will help PAWC address the high unaccounted for water levels along with continued leak detection efforts. It is suspected that there may be some unmetered connections to the water system that will be metered or eliminated after acquisition to also address the high unaccounted for water percentage in this system. A systemwide meter changeout program will occur in the first two years of post-acquisition that will transition to smart meters in an AMI system to make sure water is being accurately measured at customer connections.

While the system submitted a Service Line Inventory, there are very few details and records to support known material identification. This effort will require funding from PA American Water's Service Line Inventory Improvement Plan (IP) to identify both company-owned and customer-owned service line materials. While several customers have submitted self-identification information, company crews recently identified a galvanized service line during a leak investigation, highlighting the need for field verification. To maximize efficiency and program benefits, meter replacement activities ~~should~~will be coordinated with service line identification and replacement efforts.

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Upon closing PAWC will begin discussions with the Pennsylvania Department of Environmental Protection on 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.

B. Storage and Fire Protection

In terms of fire protection requirements, the 212,000--gallon storage tank has a sufficient

capacity to satisfy a typical fire flow requirement of 750 gpm for a two-hour duration (totaling 90,000 gallons), however, 27 of the 28 hydrants located in the system are connected to 4-inch mains. DEP requirements are for hydrants to be connected to mains no less than 6-inch in diameter. It is unlikely that the existing hydrants will be capable of providing adequate fire service. All fire hydrants and company service lines that are connected to water mains being replaced will also be replaced as part of our capital improvements plan.

The storage tank is not located on a parcel of land owned by the RSWC, nor are there easements associated with the tank. Therefore, PAWC will need to secure a permanent easement from Penn State or build a new tank on a different parcel.

~~The RSWC has several small unmetered connections located within the AG Progress site. PAWC's Tariff requires all customers to be metered and billed according to usage. Metered connections need to be installed to bill the customer according to the usage.~~

C. Source of Supply

RSWC has only one well and therefore no redundant source of supply. PAWC ~~will purchase~~has already purchased a spare well pump and motor to have on site ~~for when~~if the existing well pump fails.

D. Production

The existing treatment building and clearwell tank are in poor condition. PAWC will construct a new treatment building and clear well to provide proper safety, security, monitoring, and reliability to the system.

VII. CAPITAL IMPROVEMENT PLAN COSTS

Below is a preliminary list of capital improvements with associated estimated costs at **Attachment A**. Year one is the first year after acquisition of the RSWC system. In the table below IP are Investment Projects and RP are Reoccurring Projects

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

IP Level CAPEX	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Well station building improvements	$ 550,000	$ 550,000	$ -	$ -	$ -	$ 1,100,000
Generator	$ 120,000	$ -	$ -	$ -	$ -	$ 120,000
SCADA	$ 110,000	$ -	$ -	$ -	$ -	$ 110,000
Safety, security, fencing	$ 130,000	$ -	$ -	$ -	$ -	$ 130,000
Leak detection study	$ 55,000	$ -	$ -	$ -	$ -	$ 55,000
GIS survey	$ 45,000	$ -	$ -	$ -	$ -	$ 45,000
Main replacement	$ -	$ 3,036,000	$ 3,036,000	$ 3,036,000	$ 3,036,000	$ 12,144,000
Treatment equipment replacement	$ 350,000	$ -	$ -	$ -	$ -	$ 350,000
Storage tank replacement	$ 200,000	$ 300,000	$ 1,000,000	$ -	$ -	$ 1,500,000
Total Yearly IP CAPEX	$ 1,560,000	$ 3,886,000	$ 4,036,000	$ 3,036,000	$ 3,036,000	$ 15,554,000

RP Level CAPEX	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Mains - New	$ -	$ -	$ -	$ -	$ -	$ -
Mains - Replaced / Restored	$ -	$ -	$ -	$ -	$ -	$ -
Mains - Unscheduled	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 125,000
Mains - Relocated	$ -	$ -	$ -	$ -	$ -	$ -
Hydrants, Valves, and Manholes - New	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 25,000
Hydrants, Valves, and Manholes - Replaced	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 25,000
Services and Laterals - New	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 25,000
Services and Laterals - Replaced	$ 2,500	$ 2,500	$ 2,500	$ 2,500	$ 2,500	$ 12,500
Meter Replacement	$ 300,000	$ 300,000	$ -	$ -	$ -	$ 600,000
ITS Equipment and Systems	$ -	$ -	$ -	$ -	$ -	$ -
SCADA Equipment and Systems	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 25,000
Security Equipment and Systems	$ -	$ -	$ -	$ -	$ -	$ -
Offices and Operations Centers	$ -	$ -	$ -	$ -	$ -	$ -
Vehicles	$ 150,000	$ -	$ -	$ -	$ -	$ 150,000
Tools and Equipment	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 25,000
Process Plant Facilities and Equipment	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 50,000
System Study	$ -	$ -	$ -	$ -	$ -	$ -
Total Yearly RP CAPEX	**$ 512,500**	**$ 362,500**	**$ 62,500**	**$ 62,500**	**$ 62,500**	**$ 1,062,500**

Total Yearly IP and RP CAPEX - ALL	**$ 2,072,500**	**$ 4,248,500**	**$ 4,098,500**	**$ 3,098,500**	**$ 3,098,500**	**$ 16,616,500**

ATTACHMENT A

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

Pennsylvania-American Water Company Plan for Improvement

(CLEAN VERSION)

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

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There is a total of 28 fire hydrants in the system. Only one hydrant is located on a 6-inch water main; the other 27 hydrants are located on 4-inch mains.

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SCADA	$ 110,000	$ -	$ -	$ -	$ -	$ 110,000
Safety, security, fencing	$ 130,000	$ -	$ -	$ -	$ -	$ 130,000
Leak detection study	$ 55,000	$ -	$ -	$ -	$ -	$ 55,000
GIS survey	$ 45,000	$ -	$ -	$ -	$ -	$ 45,000
Main replacement	$ -	$ 3,036,000	$ 3,036,000	$ 3,036,000	$ 3,036,000	$ 12,144,000
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Storage tank replacement	$ 200,000	$ 300,000	$ 1,000,000	$ -	$ -	$ 1,500,000
Total Yearly IP CAPEX	$ 1,560,000	$ 3,886,000	$ 4,036,000	$ 3,036,000	$ 3,036,000	$ 15,554,000

RP Level CAPEX	Year 1	Year 2	Year 3	Year 4	Year 5	Total
Mains - New	$ -	$ -	$ -	$ -	$ -	$ -
Mains - Replaced / Restored	$ -	$ -	$ -	$ -	$ -	$ -
Mains - Unscheduled	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 25,000	$ 125,000
Mains - Relocated	$ -	$ -	$ -	$ -	$ -	$ -
Hydrants, Valves, and Manholes - New	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 25,000
Hydrants, Valves, and Manholes - Replaced	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 25,000
Services and Laterals - New	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 25,000
Services and Laterals - Replaced	$ 2,500	$ 2,500	$ 2,500	$ 2,500	$ 2,500	$ 12,500
Meter Replacement	$ 300,000	$ 300,000	$ -	$ -	$ -	$ 600,000
ITS Equipment and Systems	$ -	$ -	$ -	$ -	$ -	$ -
SCADA Equipment and Systems	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 25,000
Security Equipment and Systems	$ -	$ -	$ -	$ -	$ -	$ -
Offices and Operations Centers	$ -	$ -	$ -	$ -	$ -	$ -
Vehicles	$ 150,000	$ -	$ -	$ -	$ -	$ 150,000
Tools and Equipment	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 5,000	$ 25,000
Process Plant Facilities and Equipment	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 10,000	$ 50,000
System Study	$ -	$ -	$ -	$ -	$ -	$ -
Total Yearly RP CAPEX	**$ 512,500**	**$ 362,500**	**$ 62,500**	**$ 62,500**	**$ 62,500**	**$ 1,062,500**

Total Yearly IP and RP CAPEX - ALL	**$ 2,072,500**	**$ 4,248,500**	**$ 4,098,500**	**$ 3,098,500**	**$ 3,098,500**	**$ 16,616,500**

ATTACHMENT A