



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

June 27, 2024

Via Electronic Mail

Courtney L. Schultz, Esq.
Saul Ewing LLP
1500 Market Street
Centre Square West, 38th Floor
Philadelphia, PA 19102
courtney.schultz@saulewing.com

Re: Venango Water Company – Ex Parte Emergency Order Naming Aqua
Pennsylvania, Inc. as Receiver
Docket No. M-2023-3042180

Section 529 Investigation of Venango Water Company
Docket No. I-2023-3042312

Section 529 Investigation of Sugarcreek Water Company, West Hickory Water
Company, Plumer Water Company, Fryburg Water Company, Cooperstown
Water Company and Blaine E. Rhodes Sewer Company
Docket No. P-2024-3045205

I&E Interrogatory to Aqua – Set I

Dear Counsel:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E)
Interrogatory to Aqua Set I (no. 1) – Keller in the above-captioned proceeding. Please restate
the Interrogatory before responding. The response should identify the responding person(s).

The response to this Interrogatory is due within twenty (20) calendar days of service.
Please provide your response via email to mpodskoch@pa.gov, carwright@pa.gov, and
sgranger@pa.gov

Copies are being served on parties per the attached Certificate of Service. Should you
have any questions, please do not hesitate to contact me.

Sincerely,

Michael A. Podskoch, Jr.
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 330132
(717) 783-6151
mpodskoch@pa.gov

Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter and Certificate of Service only – via e-file*)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Venango Water Company – Ex Parte :
Emergency Order Naming Aqua : Docket No. M-2023-3042180
Pennsylvania, Inc. as Receiver :

Section 529 Investigation of North :
Venango Water Company :

Section 529 Investigation of Sugarcreek :
Water Company, West Hickory Water :
Company, Plumer Water Company, : Docket No. P-2024-3045205
Fryburg Water Company, Cooperstown :
Water Company and Blaine E. Rhodes :
Sewer Company :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatory to Aqua – Set I** dated
June 27, 2024, in the manner and upon the persons listed below:

Served via Electronic Mail Only

Alexander R. Stahl, Esq.
Aqua Pennsylvania, Inc.
762 W. Lancaster Avenue
Bryn Mawr, PA 19010
astahl@aquaamerica.com

Courtney L. Schultz, Esq.
Saul Ewing LLP
1500 Market Street
Centre Square West, 38th Floor
Philadelphia, PA 19102
courtney.schultz@saul.com

Randall L. Rhodes
Venango Water Company
P.O. Box 397
Reno, PA 16343
vwc-rlr@pa.rr.com

Rebecca Lyttle, Esq.
Steven C. Gray, Esq.
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
relyttle@pa.gov
sgray@pa.gov

Elizabeth Triscari, Esq.
Pennsylvania American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
elizabeth.triscari@amwater.com

Christy M. Appleby, Esq.
Ryan F. Marshall
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
cappleby@paoca.org
rmarshall@paoca.org

Blaine E. Rhodes Estate
c/o Desiree Rhodes, Executrix
Randall Rhodes
Kevin Rhodes
P. O. Box 397
Reno, PA 16343
vwc-rlr@pa.rr.com
desireerhodes61@gmail.com

Joseph J. Ferguson, Esq.
Cressman Erde Ferguson
300 Arch Street
Meadville, PA 16335
jferguson@cressmanerdelaw.com

Gregory J. Merkel, Esq.
Dale Woodard Gent McFate Law Firm
1030 Liberty Street
Franklin, PA 16323
merkel@dwgmlaw.com

Morgan N. DeAngelo
Regulatory Analyst
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101-1923
mdeangelo@paoca.org

Kevin C. Higgins
Principal, Energy Strategies
111 East Broadway, Suite 1200
Salt Lake City, UT 84111
khiggins@energystrat.com

Jessica Struthers
822 Walnut Street
P.O. Box 56
Reno, PA
armintal@gmail.com

Rouseville Borough
c/o Joseph Dengel
64 Main Street
P. O. Box 317
Rouseville, PA 16344
rouseville@verizon.net

Matthew Postlethwaite
Environmental Program Manager
PA Dept. of Environmental Protection
230 Chestnut Street
Meadville, PA 16335
mpostlewai@pa.gov

Via First Class Mail

Veolia Water Pennsylvania
James C. Cagle
4211 East Park Circle
Harrisburg, PA 17111

Venango Water Company
P. O. Box 397
91 Brock Street
Reno, PA 16343

Franklin Water Department
c/o Kurt McFadden
430 13th Street
Franklin, PA 16323

West Hickory Water Company
P. O. Box 397
91 Brock Street
Reno, PA 16343

Clintonville Borough Sewer and Water Authority
P. O. Box 292
Clintonville, PA 16372

Plumer Water Company
P. O. Box 397
91 Brock Street
Reno, PA 16343

City of Oil City
Water Department
21 Seneca Street #100
Oil City, PA 16301

Fryburg Water Company
P. O. Box 397
91 Brock Street
Reno, PA 16343

Cornplanter Township
136 Petroleum Center Road
Oil City, PA 16301

Cooperstown Water Company
P. O. Box 397
91 Brock Street
Reno, PA 16343

Blaine E. Rhodes Sewer Company
P. O. Box 397
91 Brock Street
Reno, PA 16343

Sugarcreek Water Company
P. O. Box 397
91 Brock Street
Reno, PA 16343



Michael A. Podskoch, Jr.
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 330132
(717) 783-6151
mpodskoch@pa.gov