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Veolia Water Pennsylvania, Inc.
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July 25, 2024

VIA ELECTRONIC MAIL

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
Harrisburg, PA 17120

Re: Responses of Veolia Water Pennsylvania, Inc. to Office of Consumer Advocate's Interrogatories Relative to Section 529 Investigation and Venango Water Company-Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. as Receiver. Docket Nos.: M-2023-3042180; I-2023-3042180; and P-2024-3045205

Dear Secretary Chiavetta,

Enclosed, please find Veolia Water Pennsylvania, Inc.'s responses to the above referenced Interrogatories.

Thank you for your attention to this matter. Please feel free to contact me if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink, appearing to read "Phoebe Youhanna", is written over a horizontal line. The signature is stylized and somewhat cursive.

Phoebe Youhanna, Esq.

Enclosure:

Cc: Christy M. Appleby, Esq.
Larry Finnicum, VWPA Regional President

CERTIFICATE OF SERVICE

Venango Water Company - Ex Parte	:	Docket No. M-2023-3042180
Emergency Order Naming Aqua Pennsylvania,	:	
Inc. as Receiver	:	
	:	
Section 529 Investigation of Venango	:	Docket No. I-2023-3042312
Water Company	:	
	:	
Section 529 Investigation of Sugarcreek	:	Docket No. P-2024-3045205
Water Company, West Hickory Water	:	
Company, Plumer Water Company, Fryburg	:	
Water Company, Cooperstown Water	:	
Company, and Blaine E. Rhodes Sewer	:	
Company	:	

I hereby certify that I have this day served a true copy of Veolia Water Pennsylvania, Inc.’s Responses to the Office of Consumer Advocate’s Interrogatories to Veolia Water Pennsylvania, Inc., Set 1, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant) upon the persons listed below. This document was filed electronically on the Commission’s electronic filing system. Dated this 25th day of July, 2024.

VIA E-MAIL

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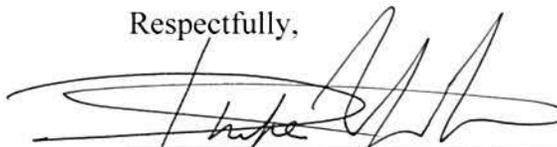
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Respectfully,



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In-House Counsel for
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461 From Road, Suite 400
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Date: July 25, 2024

**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-2023-3042180

**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**

**Interrogatories of the Office of Company to Veola Water Pennsylvania, Inc.
Set I**

OCA-1-1 Please identify any current expenses of the Company that the Company would expect to increase or decrease upon acquisition and operation of Venango Water Company (Venango) and the six small water and sewer public utilities owned by the Blaine Edwin Rhodes Estate (Rhodes Utilities), including any shared expenses or economies of scale.

Answer:

Given the proximity to the Company's current operations, the Company has not considered a potential acquisition of Venango or Rhodes Utilities. As a result, the requested analysis has not been performed.

Answer provided by: James Cagle
Title: Vice President – Rates & Regulatory Affairs
Address: 461 From Road, Paramus NJ 07652
Date: July 15, 2024

**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-2023-3042180

**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**

**Interrogatories of the Office of Company to Veola Water Pennsylvania, Inc.
Set I**

OCA-1-2 If the Company acquired Venango and Rhodes Utilities, please state whether economies of scale would reduce the cost of operating the system and whether the acquisition would help the Company keep rates reasonable for existing and acquired customers. Explain why or why not.

Answer:

Given the proximity to the Company's current operations, the Company has not considered a potential acquisition of Venango or Rhodes Utilities. As a result, the requested analysis has not been performed.

Answer provided by: James Cagle
Title: Vice President – Rates & Regulatory Affairs
Address: 461 From Road, Paramus NJ 07652
Date: July 15, 2024

**Venango Water Company-Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. As
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**Interrogatories of the Office of Company to Veola Water Pennsylvania, Inc.
Set I**

OCA-1-3 Indicate the organizational structure that the Company would use upon acquisition of Venango and Rhodes Utilities. That is, indicate whether Venango and Rhodes Utilities would be established as a separate division or “rolled into” one of the Company’s current water and wastewater divisions.

Answer:

Given the proximity to the Company’s current operations, the Company has not considered a potential acquisition of Venango or Rhodes Utilities. As a result, the requested analysis has not been performed.

Answer provided by: James Cagle
Title: Vice President – Rates & Regulatory Affairs
Address: 461 From Road, Paramus NJ 07652
Date: July 15, 2024

**Venango Water Company-Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. As
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**Interrogatories of the Office of Company to Veola Water Pennsylvania, Inc.
Set I**

OCA-1-4 Please indicate what, if any, new expenses would the Company expect to incur upon the acquisition and operation of Venango and Rhodes Utilities (*e.g.*, would additional personnel be hired, etc.).

Answer:

Given the proximity to the Company's current operations, the Company has not considered a potential acquisition of Venango or Rhodes Utilities. As a result, the requested analysis has not been performed.

Answer provided by: James Cagle
Title: Vice President – Rates & Regulatory Affairs
Address: 461 From Road, Paramus NJ 07652
Date: July 15, 2024

**Venango Water Company-Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. As
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E. Rhodes Sewer Company Docket No. P-2024-3045205**

**Interrogatories of the Office of Company to Veola Water Pennsylvania, Inc.
Set I**

OCA-1-5 Please provide an estimate of the capital costs that the Company would expect to incur if Venango and Rhodes Utilities were acquired and operated by the Company. If available, please provide a detailed breakdown of the capital costs that the Company would incur by system.

Answer:

Given the proximity to the Company's current operations, the Company has not considered a potential acquisition of Venango or Rhodes Utilities. As a result, the requested analysis has not been performed.

Answer provided by: James Cagle
Title: Vice President – Rates & Regulatory Affairs
Address: 461 From Road, Paramus NJ 07652
Date: July 15, 2024

**Venango Water Company-Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. As
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**Interrogatories of the Office of Company to Veola Water Pennsylvania, Inc.
Set I**

OCA-1-6 Has the Company done any preliminary analysis of the scope of improvements that would be needed for any of the Venango or Rhodes Utilities systems? If yes, please describe and include any internal memos, etc. on the issue.

Answer:

Given the proximity to the Company's current operations, the Company has not considered a potential acquisition of Venango or Rhodes Utilities. As a result, the requested analysis has not been performed.

Answer provided by: James Cagle
Title: Vice President – Rates & Regulatory Affairs
Address: 461 From Road, Paramus NJ 07652
Date: July 15, 2024

**Venango Water Company-Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. As
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E. Rhodes Sewer Company Docket No. P-2024-3045205**

**Interrogatories of the Office of Company to Veola Water Pennsylvania, Inc.
Set I**

OCA-1-7 Please state what effect the acquisition of Venango and Rhodes Utilities would have on the rates of existing water and wastewater customers of the Company.

Answer:

Given the proximity to the Company's current operations, the Company has not considered a potential acquisition of Venango or Rhodes Utilities. As a result, the requested analysis has not been performed.

Answer provided by: James Cagle
Title: Vice President – Rates & Regulatory Affairs
Address: 461 From Road, Paramus NJ 07652
Date: July 15, 2024

**Venango Water Company-Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. As
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**Interrogatories of the Office of Company to Veola Water Pennsylvania, Inc.
Set I**

OCA-1-8 Has the Company previously acquired small water and/or wastewater systems in need of capital improvements? If so, please identify the systems and their location in the Company's service territory, the docket number of the Orders approving the acquisitions, quantify how much the Company anticipated spending when it acquired the system and quantify how much was actually expended for capital improvements.

Answer:

In recent years, VWPA has acquired two small systems which are:

Overbrook Water Company – A-2019-3014990 and A-2019-3014991 – VWPA projected capital improvement expenditures of \$1,100,000 during the first five years of system ownership. These capital improvements include: \$100,000 for the installation of supervisory control and data acquisition assets, water quality equipment, and safety upgrades; \$200,000 for new water meters and meter pits; and \$800,000 for water main and service line replacements.

Kensington Water Company – A-2019-3012193 and A-2019-3012194 – VWPA does not project any large capital improvement expenses will be incurred during the first five years of ownership.

Answer provided by: James Cagle
Title: Vice President – Rates & Regulatory Affairs
Address: 461 From Road, Paramus NJ 07652
Date: July 15, 2024

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**Interrogatories of the Office of Company to Veola Water Pennsylvania, Inc.
Set I**

OCA-1-9 Please describe the type of capital improvements, if any, the Company has made to any small water and/or wastewater systems previously acquired pursuant to Section 529.

Answer:

Please see the response to OCA-1-8.

Answer provided by: James Cagle
Title: Vice President – Rates & Regulatory Affairs
Address: 461 From Road, Paramus NJ 07652
Date: July 15, 2024

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**Interrogatories of the Office of Company to Veola Water Pennsylvania, Inc.
Set I**

OCA-1-10 Please describe any reports, if any, the Company has filed in regard to small water and/or wastewater systems previously acquired pursuant to Section 529.

Answer:

The Company has not filed such reports.

Answer provided by: James Cagle
Title: Vice President – Rates & Regulatory Affairs
Address: 461 From Road, Paramus NJ 07652
Date: July 15, 2024

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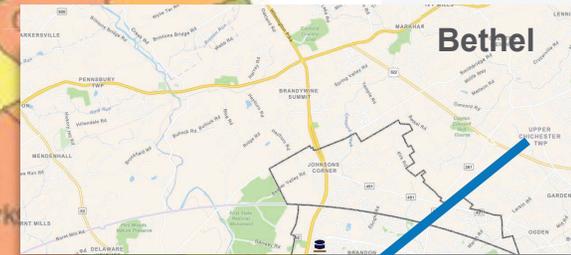
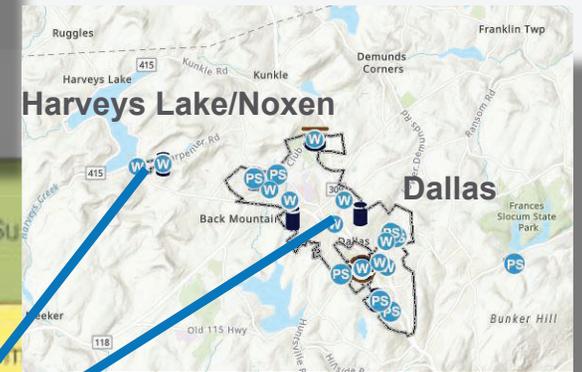
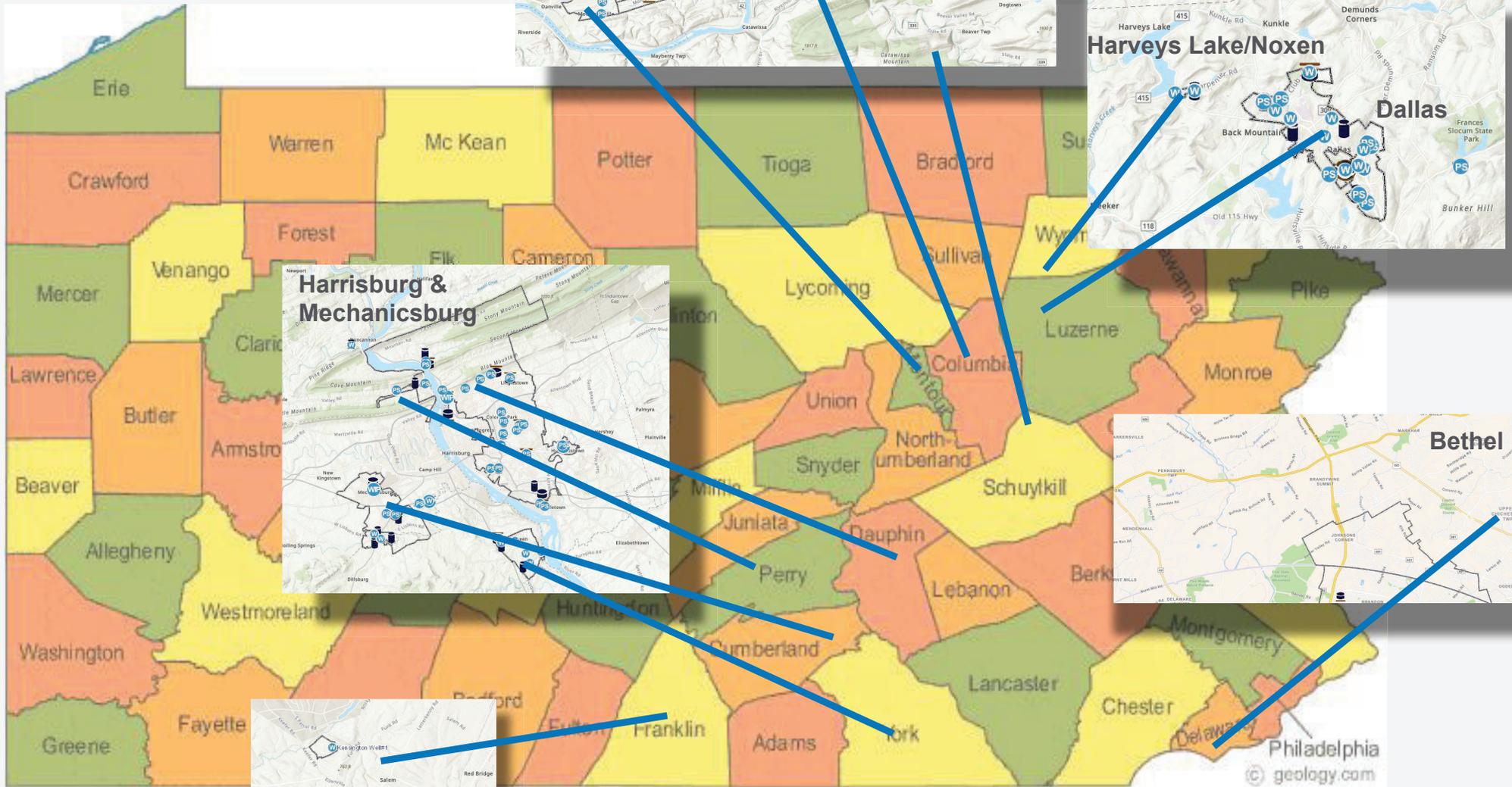
**Interrogatories of the Office of Company to Veola Water Pennsylvania, Inc.
Set I**

OCA-1-11 Please provide a map showing the distance between Venango and Rhodes Utilities operations and the Company's closest water customer connection and the distance between the Venango and Rhodes Utilities operations and the Company's closest wastewater customer connection.

Answer:

Please see attached. The distance between the Company's nearest operations and Venango and Rhodes Utilities is approximately 250 miles.

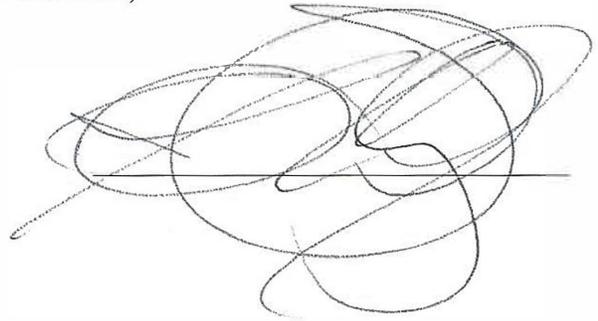
Answer provided by: James Cagle
Title: Vice President – Rates & Regulatory Affairs
Address: 461 From Road, Paramus NJ 07652
Date: July 15, 2024



VERIFICATION

I, James C. Cagle, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: July 15, 2024

A handwritten signature in black ink, appearing to be "James C. Cagle", written over a horizontal line. The signature is highly stylized and somewhat illegible due to overlapping loops and flourishes.