



**Erin K. Fure**  
Director, Corporate Counsel  
852 Wesley Drive | Mechanicsburg, PA 17055  
Phone: 717-550-1556 | Fax: 717-550-1255  
[erin.fure@amwater.com](mailto:erin.fure@amwater.com)

October 9, 2024

**VIA ELECTRONIC FILING**

Ms. Rosemary Chiavetta, Secretary  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**In re: Venango Water Company – Ex Parte Emergency Order Naming  
Aqua Pennsylvania, 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**

Dear Secretary Chiavetta:

On behalf of Pennsylvania-American Water Company, please find enclosed for filing the Notice of Appearance of Erin K. Fure.

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

Sincerely,

A handwritten signature in blue ink that reads "EK Fure".

Erin K. Fure

cc: The Honorable Deputy Chief Administrative Law Judge Mark A. Hoyer (*via electronic mail*)  
All Parties on the attached Certificate of Service (*via electronic mail*)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Venango Water Company – Ex Parte Emergency :  
Order Naming Aqua Pennsylvania, 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 : Docket No. P-2024-3045205  
Company, Cooperstown Water Company and :  
Blaine E. Rhodes Sewer Company :  
:  
:

---

**NOTICE OF APPEARANCE**

---

Pursuant to Sections 1.24 and 1.25 of the Commission's Regulations, 52 Pa. Code §§ 1.24 and 1.25, please enter the appearance of Erin K. Fure on behalf of Pennsylvania-American Water Company in the above-referenced proceeding. Documents in this proceeding should be served on the following in addition to Elizabeth Rose Triscari who is also in this case:

Erin K. Fure, Esquire (ID No. 312245)  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Telephone: 717-550-1556  
E-mail: [erin.fure@amwater.com](mailto:erin.fure@amwater.com)

Respectfully submitted,



---

Erin K. Fure, Esq. (ID No. 312245)  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Telephone: 717-550-1556  
E-mail: [erin.fure@amwater.com](mailto:erin.fure@amwater.com)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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
In re: I&E Petition to Request the Commission Open as Section 529 Investigation Into the Acquisition of Several Small Water and Sewer Utilities Owned by Blaine Edwin Rhodes Estate	Docket No. P-2024-3045205

**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving the above-referenced pleading upon the persons 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 OCTOBER 9, 2024**

Christy M. Appleby, Esquire Office of Consumer Advocate 555 Walnut Street 5th Floor Forum Place Harrisburg, PA 17101-1923 <a href="mailto:CAppleby@paoca.org">CAppleby@paoca.org</a>	Steven C. Gray, Esquire Rebecca Lyttle, Esquire Assistant Small Business Advocate Office of Small Business Advocate Forum Place 555 Walnut Street, 1st Floor Harrisburg, PA 17101 <a href="mailto:sgray@pa.gov">sgray@pa.gov</a> <a href="mailto:relyttle@pa.gov">relyttle@pa.gov</a>
Carrie B. Wright, Esquire Scott B. Granger, Esquire Michael A. Podskoch, Esquire Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, Pennsylvania 17120 <a href="mailto:carwright@pa.gov">carwright@pa.gov</a> <a href="mailto:sgranger@pa.gov">sgranger@pa.gov</a> <a href="mailto:mpodskoch@pa.gov">mpodskoch@pa.gov</a>	Alexander R. Stahl, Esquire Aqua Pennsylvania, Inc 762 W. Lancaster Avenue Bryn Mawr, PA 19010 <a href="mailto:astahl@aquaamerica.com">astahl@aquaamerica.com</a>

<p>Courtney L. Schultz, Esquire Saul Ewing LLP 1500 Market Street, 38<sup>th</sup> Floor Philadelphia, PA 19102 <a href="mailto:Courtney.schultz@saul.com">Courtney.schultz@saul.com</a></p>	<p>Gregory J. Merkel, Esquire Dale Woodard, Esquire Gent McFate Law Firm 1030 Liberty Street Franklin, PA 16323 <a href="mailto:merkel@dwgmlaw.com">merkel@dwgmlaw.com</a></p>
<p>Randall L. Rhodes Venango Water Company PO Box 397 Reno, PA 16343 <a href="mailto:vwc-rlr@pa.rr.com">vwc-rlr@pa.rr.com</a></p>	<p>Phoebe Youhanna, Esquire Veolia Water Pennsylvania, Inc. 461 From Road, Suite 400 Paramus, NJ 07652 <a href="mailto:Phoebe.youhanna@veolia.com">Phoebe.youhanna@veolia.com</a></p>
<p>James C. Cagle, Vice President Rates and Regulatory Affairs Veolia Water Pennsylvania 6310 Allentown Boulevard Harrisburg, PA 17112 <a href="mailto:James.cagle@veolia.com">James.cagle@veolia.com</a></p>	<p>Joseph J. Ferguson, Esquire Cressman Erde Ferguson 300 Arch Street Meadville, PA 16335 <a href="mailto:jferguson@cressmanerdelaw.com">jferguson@cressmanerdelaw.com</a></p>
<p>Rouseville Borough c/o Joseph Dengel 64 Main Street P.O. Box 317 Rouseville, PA 16344 <a href="mailto:rouseville@verizon.net">rouseville@verizon.net</a></p>	

Respectfully Submitted,




---

Erin K. Fure, Esquire (PA ID #312245)  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Phone: (717) 550-1556  
Email: [erin.fure@amwater.com](mailto:erin.fure@amwater.com)

**Attorney for Pennsylvania-American  
Water Company**