

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE  
555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
(800) 684-6560

 @pa\_oca  
 /pennoca  
FAX (717) 783-7152  
consumer@paoca.org  
www.oca.pa.gov

October 16, 2024

**Via Electronic Mail Only**

James C. Cagle  
Veolia Water  
310 Allentown Blvd., Suite 104  
Harrisburg, PA 17112  
james.cagle@veolia.com

Re: I&E Petition to Request the Commission  
Open a Section 529 Investigation into the  
Acquisition of Rock Spring Water Company  
Docket Nos. P-2024-3051313  
I-2024-

Dear Mr. Cagle:

Enclosed please find Interrogatories of the Office of Consumer Advocate, Set 1, in this matter.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within twenty (20) days of service. The OCA would appreciate your efforts to meet the modified discovery response deadlines that have been used in prior Applications filed pursuant to Sections 1102 and 1329 of the Public Utility Code. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

James C. Cagle  
October 16, 2024  
Page 2

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code § 5.341(b).

Respectfully submitted,

*/s/ Emily A. Farren* \_\_\_\_\_

Emily A. Farren  
Assistant Consumer Advocate  
PA Attorney I.D. # 322910  
EFarren@paoca.org

Enclosures

cc: PUC Secretary Chiavetta (Letter and Certificate of Service only)  
Certificate of Service

CERTIFICATE OF SERVICE

I&E Petition to Request the Commission : Docket Nos. P-2024-3051313  
Open a Section 529 Investigation into the : I-2024-  
Acquisition of Rock Spring Water Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Veolia Water, Set I, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 16th day of October 2024.

**SERVICE BY E-MAIL ONLY**

NazAarah Sabree  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor Forum Place  
Harrisburg, PA 17101  
ra-sba@pa.gov  
*Small Business Advocate*

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

Carrie B. Wright, Esq.  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, Pennsylvania 17120  
carwright@pa.gov  
*Counsel for I&E*

Elizabeth Triscari, Esq.  
PA American Water Company, Inc.  
852 Wesley Drive  
Mechanicsburg, PA 17055  
elizabeth.triscari@amwater.com  
*Counsel for PAWC*

James C. Cagle  
Veolia Water  
310 Allentown Blvd., Suite 104  
Harrisburg, PA 17112  
james.cagle@veolia.com

Brian C. Heiser  
Executive Director  
State College Borough Water Authority  
1201 West Branch Road  
State College, PA 16801  
brian@scbwa.org

**SERVICE BY FIRST-CLASS MAIL**

J. Roy Campbell  
Rock Spring Water Company  
1750 Tadpole Rd.  
Furnace, PA 16865

Raymond Myers, Chairman  
Huntingdon Area Water and Sewer Authority  
81555 Deforrest Road  
Huntingdon, PA 16652

*/s/ Emily A. Farren*

Emily A. Farren  
Assistant Consumer Advocate  
PA Attorney I.D. # 322910  
EFarren@paoca.org

Jacob D. Guthrie, Esq.  
Assistant Consumer Advocate  
PA Attorney I.D. # 334367  
JGuthrie@paoca.org

Counsel for:  
Patrick M. Cicero

Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101  
Phone: (717) 783-5048

Dated: October 16, 2024