



COMMONWEALTH OF PENNSYLVANIA

October 23, 2024

E-FILED

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

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 Chiavetta:

Enclosed please find the Notice of Intervention, Public Statement and Verification, on behalf of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceeding.

Copies will be served on all known parties in this proceeding, as indicated on the attached Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

Enclosures

cc: Kevin Higgins
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

I&E Petition to Request the Commission	:	
Open a Section 529 Investigation into the	:	Docket No. P-2024-3051313
Acquisition of Rock Spring Water Company	:	

**NOTICE OF INTERVENTION
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Office of Small Business Advocate (“OSBA”) files this Notice of Intervention with respect to the filing (“Petition”) of the Pennsylvania Public Utility Commission (“Commission” or “PUC”), by and through its Bureau of Investigation and Enforcement (I&E), to petition the Commission pursuant to Sections 5.1 and 5.41 of Commission Regulations to open a Section 529 investigation into whether the Commission should order a capable public utility to acquire Rock Spring Water Company (Rock Spring or Company). In support of this Notice of Intervention, the OSBA avers as follows:

1. The OSBA is an agency of the Commonwealth of Pennsylvania authorized by the Small Business Advocate Act (Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50) to represent the interest of small business consumers as a party in proceedings before the Commission.

2. Representing the OSBA in this proceeding is:

Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
(717) 783-2525 / (717) 783-2831 (fax)
relyttle@pa.gov

Respectfully submitted,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney I.D. No. 201399

For: NazAarah Sabree
Small Business Advocate

Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Date: October 23, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

I&E Petition to Request the Commission :
Open a Section 529 Investigation into the : **Docket No. P-2024-3051313**
Acquisition of Rock Spring Water Company :

**PUBLIC STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE**

The Small Business Advocate is authorized and directed to represent the interest of small business consumers of utility services in Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”). The Act further provides that the Small Business Advocate is to issue publicly a written statement stating concisely the specific interest of small business consumers to be protected by her initiation of or intervention in any proceeding involving those interests before the Public Utility Commission or any other agency or court.

This Public Statement relates to the filing (“Petition”) by the Pennsylvania Public Utility Commission (Commission or PUC), by and through its Bureau of Investigation and Enforcement (I&E), to petition the Commission pursuant to Sections 5.1 and 5.41 of Commission Regulations to open a Section 529 investigation into whether the Commission should order a capable public utility to acquire Rock Spring Water Company (Rock Spring or Company).

The Small Business Advocate files this Public Statement to protect the interests of Rock Spring’s small business customers that could be affected by the request set forth in the Petition.

The Small Business Advocate will participate in proceedings before the Public Utility Commission to investigate the reasonableness of proposals set forth in the Petition. The Small Business Advocate will ask the Commission to deny any aspect of the Petition that are not proven to be lawful, just, reasonable, and non-discriminatory.

Dated: October 23, 2024

VERIFICATION

I, NazAarah Sabree, hereby state that the facts set forth herein 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: October 23, 2024



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

I&E Petition to Request the Commission :
Open a Section 529 Investigation into the : **Docket No. P-2024-3051313**
Acquisition of Rock Spring Water Company :

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless otherwise noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

The Honorable John Coogan
Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
jcoogan@pa.gov

Carrie B. Wright, Esquire
Deputy Chief Prosecutor
Bureau of Investigation & Enforcement
400 North Street
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Jacob D. Guthrie, Esquire
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J. Roy Campbell
Rock Spring Water Company
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Furnace, PA 16865
(First Class Mail Only)

State College Borough Water Authority
1201 West Branch Road
State College, PA 16801
(First Class Mail Only)

Raymond Myers, Chairman
Huntingdon Area Water and Sewer Authority
81555 De Forrest Road
Huntingdon, PA 16652
(First Class Mail Only)

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211 Kimport Avenue
Boalsburg, PA 16827
bmix470@gmail.com

DATE: October 23, 2024

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney I.D. No. 201399