



GOVERNOR'S OFFICE OF GENERAL COUNSEL
DEPARTMENT OF ENVIRONMENTAL PROTECTION

December 31, 2024

Via Electronic Mail

James N. Bryant, Esq.
Carolyn M. Larrabee, Esq.
BRYANT LARRABEE, P.C.
107 East Main Street
P.O. Box 551
Millheim, PA 16854

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 Counsel:

Enclosed please find the Department of Environmental Protection's First Set of Interrogatories to Rock Spring Water Company.

Please provide verified answers to these Interrogatories within twenty (20) calendar days of service pursuant to the Prehearing Conference Order dated November 5, 2024, and email the responses to achaplin@pa.gov and gmasser@pa.gov.

A copy these Interrogatories has been served upon all parties, and a Certificate of Service has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission. Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Amanda Chaplin

Amanda Chaplin, PA I.D. No. 314076
Assistant Counsel

Enclosures (Interrogatories)

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

**COMMONWEALTH OF PENNSYLVANIA
BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission :
 Bureau of Investigation & Enforcement :
 Petition to Request the Commission Open : P-2024-3051313
 Section 529 Investigation into the :
 Acquisition of Rock Spring Water Company :

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing Interrogatories dated December 31, 2024, in the manner and upon the persons listed below:

SERVED VIA ELECTRONIC MAIL ON DECEMBER 31, 2024

Carrie B. Wright, Deputy Chief Prosecutor Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street Harrisburg, Pennsylvania 17120 carwright@pa.gov	Elizabeth A. Dupuis, Esquire Morgan M. Madden, Esquire Babst, Calland, Clements & Zomnir, P.C. 330 Innovation Blvd., Suite 302 State College, PA 16803 bdupuis@babstcalland.com mmadden@babstcalland.com (Counsel for Ferguson Township)
Jacob D. Guthrie, Esquire Emily A. Farren, Esquire Office of Consumer Advocate 555 Walnut Street 5th Floor Forum Place Harrisburg, PA 17101-1923 OCARockSpring@paoca.org	Rebecca Lyttle, Esquire Office of Small Business Advocate Forum Place 555 Walnut Street, 1st Floor Harrisburg, PA 17101 relyttle@pa.gov
Elizabeth Rose Triscari, Esquire Teresa K. Harrold, Esquire Pennsylvania-American Water Company 852 Wesley Drive Mechanicsburg, PA 17055 elizabeth.triscari@amwater.com teresa.harrold@amwater.com (Counsel for Pennsylvania-American Water Company)	Alexandar R. Stahl, Esquire Aqua Pennsylvania, Inc. 762 W. Lancaster Avenue Bryn Mawr, PA 19010 astahl@aquaamerica.com (Counsel for Aqua Pennsylvania, Inc.)

<p>David P. Zambito, Esquire Jonathan P. Nase, Esquire Cozen OConnor 17 North Second Street Suite 1410 Harrisburg, PA 17101 dzambito@cozen.com jnase@cozen.com (Counsel for Pennsylvania-American Water Company)</p>	<p>Robert A. Mix, Esquire Robert Mix Law 211 Kimport Avenue Boalsburg, PA 16827 Bmix470@gmail.com (Counsel for State College Borough Water Authority)</p>
<p>James N. Bryant, Esquire Carolyn M. Larrabee, Esquire 107 East Main Street P.O. Box 551 Millheim, PA 16854 Jnbryant1@verizon.net cmlarrabee@centrecountylaw.com (Counsel for Rock Spring Water Company)</p>	

COMMONWEALTH OF PENNSYLVANIA,
DEPARTMENT OF
ENVIRONMENTAL PROTECTION

/s/Amanda Chaplin

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Date: December 31, 2024