



GOVERNOR'S OFFICE OF GENERAL COUNSEL  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

December 31, 2024

***Via Electronic Mail***

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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 Pennsylvania-American 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](mailto:achaplin@pa.gov) and [gmasser@pa.gov](mailto:gmasser@pa.gov).

Elizabeth Rose Triscari, Esq.  
Teresa K. Harold, Esq.  
David P. Zambito, Esq.  
Jonathan P. Nase, Esq.

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December 31, 2024

A copy of 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

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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 <a href="mailto:carwright@pa.gov">carwright@pa.gov</a>	Elizabeth A. Dupuis, Esquire Morgan M. Madden, Esquire Babst, Calland, Clements & Zomnir, P.C. 330 Innovation Blvd., Suite 302 State College, PA 16803 <a href="mailto:bdupuis@babstcalland.com">bdupuis@babstcalland.com</a> <a href="mailto:mmadden@babstcalland.com">mmadden@babstcalland.com</a> (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 <a href="mailto:OCARockSpring@paoca.org">OCARockSpring@paoca.org</a>	Rebecca Lyttle, Esquire Office of Small Business Advocate Forum Place 555 Walnut Street, 1st Floor Harrisburg, PA 17101 <a href="mailto:relyttle@pa.gov">relyttle@pa.gov</a>
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<p>James N. Bryant, Esquire Carolyn M. Larrabee, Esquire 107 East Main Street P.O. Box 551 Millheim, PA 16854 <a href="mailto:Jnbryant1@verizon.net">Jnbryant1@verizon.net</a> <a href="mailto:cmlarrabee@centrecountylaw.com">cmlarrabee@centrecountylaw.com</a> (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