



GOVERNOR'S OFFICE OF GENERAL COUNSEL  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

August 7, 2025

***Via Electronic Mail***

Rod Beard, Esquire  
Beard Law Company  
101 N Allegheny Street  
Bellefonte, PA 16823  
[rod@beardlawco.com](mailto:rod@beardlawco.com)  
(Counsel for Rock Spring Water Company)

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 Second 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 Orders dated November 5, 2024, and July 24, 2025, and email the responses to [achaplin@pa.gov](mailto:achaplin@pa.gov) and [gmasser@pa.gov](mailto:gmasser@pa.gov).

A copy of these Interrogatories has been served upon all parties and a Certificate of Service has been filed with Secretary Homsher 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 Matthew L. Homsher (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 Department of Environmental Protection’s Second Set of Interrogatories to Rock Spring Water Company in the manner and upon the persons listed below:

**SERVED VIA ELECTRONIC MAIL ON AUGUST 7, 2025**

|   |   |
|---|---|
| Carrie B. Wright, Deputy Chief Prosecutor<br>Pennsylvania Public Utility Commission<br>Bureau of Investigation and Enforcement<br>Commonwealth Keystone Building<br>400 North Street<br>Harrisburg, Pennsylvania 17120<br><a href="mailto:carwright@pa.gov">carwright@pa.gov</a>  | Elizabeth A. Dupuis, Esquire<br>Morgan M. Madden, Esquire<br>Babst, Calland, Clements & Zomnir, P.C.<br>330 Innovation Blvd., Suite 302<br>State College, PA 16803<br><a href="mailto:bdupuis@babstcalland.com">bdupuis@babstcalland.com</a><br><a href="mailto:mmadden@babstcalland.com">mmadden@babstcalland.com</a><br>(Counsel for Ferguson Township) |
| Melanie Joy El Atieh, Esquire<br>Jacob D. Guthrie, Esquire<br>Office of Consumer Advocate<br>555 Walnut Street<br>5th Floor Forum Place<br>Harrisburg, PA 17101-1923<br><a href="mailto:OCARockSpring@paoca.org">OCARockSpring@paoca.org</a>  | Rebecca Lyttle, Esquire<br>Steven Gray, Esquire<br>Office of Small Business Advocate<br>Forum Place<br>555 Walnut Street, 1st Floor<br>Harrisburg, PA 17101<br><a href="mailto:relyttle@pa.gov">relyttle@pa.gov</a><br><a href="mailto:sgray@pa.gov">sgray@pa.gov</a>   |
| Elizabeth Rose Triscari, Esquire<br>Teresa K. Harrold, Esquire<br>Pennsylvania-American Water Company<br>852 Wesley Drive<br>Mechanicsburg, PA 17055<br><a href="mailto:elizabeth.triscari@amwater.com">elizabeth.triscari@amwater.com</a><br><a href="mailto:teresa.harrold@amwater.com">teresa.harrold@amwater.com</a><br>(Counsel for Pennsylvania-American Water Company) | Alexandar R. Stahl, Esquire<br>Aqua Pennsylvania, Inc.<br>762 W. Lancaster Avenue<br>Bryn Mawr, PA 19010<br><a href="mailto:astahl@aquaamerica.com">astahl@aquaamerica.com</a><br>(Counsel for Aqua Pennsylvania, Inc.)   |
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| <p>David P. Zambito, Esquire<br/>Jonathan P. Nase, Esquire<br/>Cozen O'Connor<br/>17 North Second Street<br/>Suite 1410<br/>Harrisburg, PA 17101<br/><a href="mailto:dzambito@cozen.com">dzambito@cozen.com</a><br/><a href="mailto:jnase@cozen.com">jnase@cozen.com</a><br/>(Counsel for Pennsylvania-American Water Company)</p> | <p>Robert A. Mix, Esquire<br/>Robert Mix Law<br/>211 Kimport Avenue<br/>Boalsburg, PA 16827<br/><a href="mailto:Bmix470@gmail.com">Bmix470@gmail.com</a><br/>(Counsel for State College Borough Water Authority)</p> |
| <p>Rod Beard, Esquire<br/>Beard Law Company<br/>101 N Allegheny Street<br/>Bellefonte, PA 16823<br/><a href="mailto:rod@beardlawco.com">rod@beardlawco.com</a><br/>(Counsel for Rock Spring Water Company)</p>   |  |

COMMONWEALTH OF PENNSYLVANIA,  
DEPARTMENT OF ENVIRONMENTAL  
PROTECTION

/s/Amanda Chaplin  
Amanda Chaplin, PA I.D. #314076  
Assistant Counsel

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Date: August 7, 2025