



GOVERNOR'S OFFICE OF GENERAL COUNSEL  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

August 25, 2025

***Via Electronic Mail***

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(Counsel for Pennsylvania-American 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 Responses to the Requests for Admission - Set I propounded by Pennsylvania-American Water Company in the above-referenced proceeding.

A copy of these Responses has been served upon all parties and a Certificate of Service has been filed with Secretary Homsher of the Pennsylvania Public Utility Commission.

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

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August 25, 2025

Thank you for your attention to this matter. Please do not hesitate to contact me with any questions at [achaplin@pa.gov](mailto:achaplin@pa.gov).

Sincerely,

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

Enclosures (Responses to Requests for Admission)

c: Matthew L. Homsher, PUC Secretary (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 Responses to the Requests for Admission - Set I propounded by the Pennsylvania-American Water Company in the manner and upon the persons listed below:

**SERVED VIA ELECTRONIC MAIL ON AUGUST 25, 2025**

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)
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<p>Rod Beard, Esquire Beard Law Company 101 N Allegheny Street Bellefonte, PA 16823 <a href="mailto:rod@beardlawco.com">rod@beardlawco.com</a> (Counsel for Rock Spring Water Company)</p>	

COMMONWEALTH OF PENNSYLVANIA,  
DEPARTMENT OF ENVIRONMENTAL  
PROTECTION

/s/Amanda Chaplin  
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