



COMMONWEALTH OF PENNSYLVANIA

November 19, 2025

E-FILED

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**Re: Office of Small Business Advocate v. Veolia Water Company, Inc. / Docket
No. C-2025-305_____**

Dear Secretary Homsher:

Enclosed please find the Formal Complaint, 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: Parties of Record

FORMAL COMPLAINT
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

I. COMPLAINANT

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

II. UTILITY NAME

Veolia Water Company, Inc.
6310 Allentown Road
Harrisburg, PA 17111

III. TYPE OF UTILITY

Water

IV. COMPLAINT

The Pennsylvania Office of Small Business Advocate (“OSBA”), by and through the undersigned counsel, files this Formal Complaint against Veolia Water Company, Inc. (“Veolia” or the “Company”), pursuant to 66 Pa. C.S. § 701 and the Pennsylvania Public Utility Commission’s (“Commission”) regulations at 52 Pa. Code §§ 5.21–5.31, and in support thereof avers the following:

1. The Small Business Advocate is authorized and directed to represent the interests of small business consumers of utility services in Pennsylvania in proceedings before the Commission under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50 (the “Act”).

2. The Respondent, Veolia, is a jurisdictional public utility providing water service to numerous municipalities across Pennsylvania under authority granted by the Commission.

3. Veolia provides water service to over 66,000 customers in nine counties throughout Pennsylvania: Columbia; Cumberland; Dauphin; Franklin; Luzerne; Perry; Schuylkill; Wyoming; and York Counties.

4. Veolia has approximately 500 miles of water mains in the Dauphin County Harrisburg region.

5. Allegedly, a June 22, 2025, disruption at the Veolia water treatment plant in Susquehanna Township, followed by an unprecedented eight water main breaks in a six-week period, as well as both permitted and unpermitted hydrant usage, has led to ongoing water discoloration issues.

6. Small businesses of Susquehanna Township, Lower Paxton Township, Swatara Township, and Marysville Borough have reported water discoloration in the weeks following the June 22, 2025, plant disruption.

7. Veolia stated that out of 2,614 commercial customers in this area, only 108 have reported discolored water since May 2025.

8. From April through August of 2025, a dentist office located in the Company's relevant territory complained of water discoloration which was a deep orange color. Because of this discoloration the following occurred:

- a. The dental office was forced to close for three weeks;
- b. The dental office had to buy bottled water in order to operate;

- c. The office's filtration system broke due to the increased sediment. The office received a quote to repair the filtration system on August 27, 2025, of approximately \$13,000.00; and
- d. When the office contacted Veolia, the Company only offered to flush their system. Veolia flushed the dentist office's system twice in the past seven months.

9. The discoloration included yellow, brown, and rust-colored water, allegedly rendering it unsuitable for normal commercial use by restaurants, salons, daycares, laundromats, dentist offices, and other small businesses reliant on clean water.

10. These conditions may have created direct and measurable harm to small businesses, including: (a) loss of revenue from customers unwilling to patronize businesses using visibly discolored water; (b) damage to business equipment (coffee machines, laundry systems, dishwashers, and filtration devices); (c) increased operating costs due to purchasing bottled water and filtration systems; and (d) reputational harm to businesses accused of unsanitary practices outside of their control.

11. Despite multiple customer complaints and media reports, Veolia failed to provide timely notice, adequate remediation, or a transparent explanation regarding the cause and duration of the discolored water events.

12. On August 1, 2025, Veolia issued a statement on the Company's Facebook page to "Run your cold water tap for 10-15 minutes to flush the line. If discoloration persists, please contact our Customer Service team."

13. Allegedly, Veolia has agreed to issue credits to those customers who used increased water when they tried to clear their water lines by flushing for several minutes due to the discoloration.

14. Upon information and belief, Veolia has failed to take into consideration that many commercial consumers were forced to use less of the Company's water during this discoloration period at a substantial cost and inconvenience.

15. As of September 10, 2025, Veolia consumers located in the Susquehanna Valley were submitting complaints about this discoloration on Veolia's Facebook page.

16. As of October 24, 2025, Veolia was still having water discoloration issues in the relevant territory.

17. Upon information and belief, Veolia has failed to contact every commercial consumer in the affected area by either email or bill insert to apprise them of their potential to receive credits towards their bills.

18. The Pennsylvania Public Utility Commission has jurisdiction over this matter pursuant to 66 Pa. C.S. §§ 501, 701, and 1501.

19. Veolia, as a public utility, is required by 66 Pa. C.S. § 1501 to provide adequate, efficient, safe, reasonable, and reliable service to its customers.

20. Discolored water is *prima facie* evidence of inadequate service.

21. Veolia's recurring episodes of discolored water, coupled with inadequate customer outreach and mitigation, demonstrate a pattern of unreasonable and unsafe service.

22. The informal complaints raise serious concerns regarding water service quality and whether clean water will continuously be available. Veolia's management of its network, staffing resources, and response to consumer discoloration reports suggest a broad failure to meet the Company's legal obligations. The Company's failure to provide clean water as reported in recent months, harm both the consumer and their communities.

23. Veolia has or may have violated its obligations to furnish and maintain adequate, efficient, safe, and reasonable services and facilities in compliance with Section 1501 of the Public Utility Code. 66 Pa.C.S. § 1501. Based upon available information, the Company has not provided service that is reasonably continuous and is of sufficient quality. The informal complaints also report that the Company's call center, business center, and service offices have not provided reasonable service when customers have attempted to report discoloration, or request prompt dispatch of technicians for repairs.

24. The resulting harm falls disproportionately on small business customers, many of whom lack the financial resources to absorb these unanticipated costs.

25. Veolia's failure to ensure water quality that meets safe and reliable service standards constitutes a violation of the Company's statutory duty under 66 Pa. C.S. § 1501.

VI. RELIEF REQUESTED

WHEREFORE, the Office of Small Business Advocate respectfully requests that the Pennsylvania Public Utility Commission:

- a. Refer this matter to the Office of Administrative Law Judge for hearings;
- b. Hold public input hearings within the Company's relevant service territory;
- c. Direct Veolia to undertake immediate remedial measures to address the causes of discolored water and prevent recurrence.
- d. Require Veolia to implement a small business customer relief program, including bill credits, reimbursement for damages, and other mitigation funds as needed.
- e. Require Veolia to submit a public communication and notice plan to ensure timely, transparent notification of water quality issues, including but not limited to, text alerts.
- f. Require Veolia to promptly remediate all existing discoloration and other service quality complaints;

- g. Require Veolia to assess and improve its staffing and resources to better maintain its network and be prepared to promptly respond to fix water discoloration;
- h. Find that Veolia Water Company, Inc. has failed to provide adequate, reasonable, and reliable service in violation of 66 Pa. C.S. § 1501;
- i. Impose civil penalties for failure to comply with provisions of the Public Utility Code and the Commission's regulations; and
- j. Grant any other relief deemed necessary.

Respectfully submitted,

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID 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

Dated: November 19, 2025

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

The Small Business Advocate is authorized and directed to represent the interests 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 (“Commission”) or any other agency or court. This public statement relates to the filing today of a Complaint by the Small Business Advocate against Veolia Water Company, Inc., (“Veolia” or the “Company”).

Veolia stated that 108 commercial consumers have reported discolored water since May 2025. Furthermore, there is a concern that several other commercial consumers may have also suffered due to this discoloration.


The Small Business Advocate files this Complaint to develop a record addressing the quality of service provided by Veolia and to protect the interests of the Company’s small business customers.

Dated: November 19, 2025

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: November 19, 2025



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office of Small Business Advocate :
 : **Docket No. C-2025-305** _____
 v. :
 :
 Veolia Water Company, Inc. :

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 Charles E. Rainey, Jr.
Chief Administrative Law Judge
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6310 Allentown Road
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Date: November 19, 2025

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399