



COMMONWEALTH OF PENNSYLVANIA

December 16, 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-2025-3058757**

Dear Secretary Homsher:

Enclosed please find the Answer to the Preliminary Objection of Veolia Water Pennsylvania, Inc., 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/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Enclosures

cc: Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office of Small Business Advocate	:	
	:	Docket No. C-2025-3058757
	:	
v.	:	
	:	
Veolia Water Pennsylvania, Inc.	:	

**ANSWER OF
THE OFFICE OF SMALL BUSINESS ADVOCATE
TO THE PRELIMINARY OBJECTION OF
VEOLIA WATER PENNSYLVANIA, INC.**

On November 19, 2025, the Office of Small Business (“OSBA”) filed a Complaint against Veolia Water Pennsylvania, Inc. (“Veolia” or the “Company”) alleging that Veolia has or may have violated its obligations to furnish and maintain adequate, efficient, safe, and reasonable service and facilities in compliance with Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501.

Pursuant to 52 Pa. Code § 5.101(f), the Office of Small Business (“OSBA”) files this Answer to the Preliminary Objection of Veolia that was filed with the Pennsylvania Public Utility Commission (“Commission”) on December 11, 2025.

I. Background

1. Admitted.
2. Admitted.
3. Admitted.

II. Legal Standard

4. Denied to the extent that this Paragraph states legal conclusions to which no response is required.

5. Denied to the extent that this Paragraph states legal conclusions to which no response is required.

III. Preliminary Objection

6. Admitted that the OSBA's Complaint contains a Request for Relief. Denied that the OSBA's Request for Relief is "lengthy."

7. Admitted that the OSBA's Complaint alleges that Veolia has or may have violated its obligations to furnish and maintain adequate, efficient, safe, and reasonable service and facilities in violation of 66 Pa. Code § 1501. By way of further response, the OSBA will establish the allegations as set forth in this Paragraph and in its Complaint through evidence presented at an evidentiary hearing.

8. Denied to the extent that this Paragraph states legal conclusions to which no response is required.

9. Denied to the extent that this Paragraph states legal conclusions to which no response is required.

10. Denied to the extent that this Paragraph states legal conclusions to which no response is required.

11. Denied to the extent that this Paragraph states legal conclusions to which no response is required.

12. Denied to the extent that this Paragraph states legal conclusions to which no response is required.

13. Denied to the extent that this Paragraph states legal conclusions to which no response is required. By way of further response, the OSBA agrees that the Commission should strike the words “reimbursement for damages” in Paragraph VI.d. of the OSBA’s Complaint.

14. Denied. By way of further response, the allegations, as set forth in the OSBA’s Complaint, that Veolia has or may have violated its obligations to furnish and maintain adequate, efficient, safe, and reasonable service and facilities in violation of 66 Pa. Code § 1501, if proven, would support Commission relief and therefore warrant development of a full evidentiary record.

Relief Requested

WHEREFORE, as set forth above and in the OSBA’s Complaint, the OSBA requests that the Commission:

- (1) strike the words “reimbursement for damages” in Paragraph VI.d. of the OSBA’s Complaint, and
- (2) overrule the remainder of Veolia’s Preliminary Objection in its entirety and direct the matter to proceed to discovery and evidentiary hearing.

Respectfully submitted,

/s/ Steven C. Gray
Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

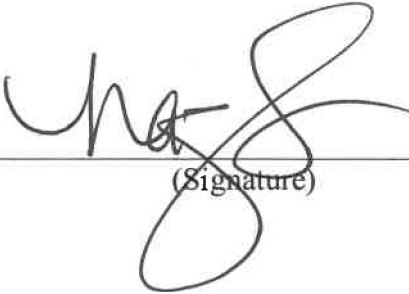
Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Dated: December 16, 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: December 16, 2025



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office of Small Business Advocate :
 : **Docket No. C-2025-3058757**
 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.
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Date: December 16, 2025

/s/ Steven C. Gray
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