



COMMONWEALTH OF PENNSYLVANIA

January 21, 2026

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. & Office of
Consumer Advocate v. Veolia Water Company, Inc. / Docket Nos. C-2025-3058757
& C-2025-3058865**

Dear Secretary Homsher:

Enclosed for filing please find the Reply to New Matter of the Office of Small Business Advocate (“OSBA”), in the above-referenced proceedings.

Copies will be served on all known parties in these proceedings, 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 COMISSION**

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

Office of Consumer Advocate :
 : **Docket No. C-2025-3058865**
 v. :
 :
Veolia Water Company, Inc. :

**OFFICE OF SMALL BUSINESS ADVOCATE’S
REPLY TO NEW MATTER OF
VEOLIA WATER PENNSYLVANIA, INC.**

NOW COMES the Office of Small Business Advocate (“OSBA”), and files this Reply to New Matter of Veolia Water Pennsylvania, Inc (“Veolia”), pursuant to 52 Pa. Code § 5.63(a). The purpose of New Matter in response to a Complaint is to “set forth ... another material fact which is not merely a denial of the averments of the preceding pleading” or to raise affirmative defenses. 52 Pa. Code § 5.62(b). In support of its Reply to New Matter, the OSBA avers, as follows:

New Matter

- 26. Denied. The averments constitute legal conclusions to which no response is required; to the extent a response is deemed necessary, they are denied.
- 27. Admitted.
- 28. Admitted

29. Denied. The averments constitute legal conclusions to which no response is required; to the extent a response is deemed necessary, they are denied.
30. Denied. The averments constitute legal conclusions to which no response is required; to the extent a response is deemed necessary, they are denied.
31. Denied.
32. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
33. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
34. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
35. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
36. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
37. Denied.
38. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
39. Denied.
40. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
41. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.

42. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
43. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
44. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
45. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
46. Denied for lack of sufficient information to form a belief as to the truth of the averments contained in this paragraph, and therefore denied.
47. Admitted in part and denied in part. Admitting only that Veolia responded to the OSBA's informal discovery. All remaining averments are denied.

WHEREFORE, for all the foregoing reasons, the Office of Small Business Advocate respectfully requests that the Office of Administrative Law Judge and the Pennsylvania Public Utility Commission reject the New Matter raised by Veolia and sustain the OSBA's Complaint.

Respectfully submitted,

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

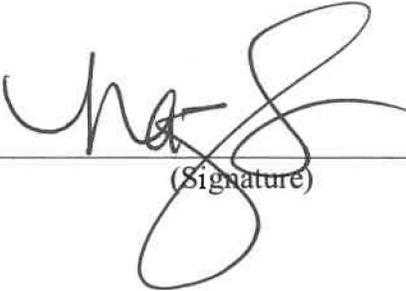
Commonwealth of Pennsylvania
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101

Dated: January 21, 2026

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: January 21, 2026



(Signature)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Office of Small Business Advocate	:	
	:	Docket No. C-2025-3058757
v.	:	
	:	
Veolia Water Company, Inc.	:	
Office of Consumer Advocate	:	
	:	Docket No. C-2025-3058865
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 Chad Allensworth
Administrative Law Judge
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Date: January 21, 2026

/s/ Steven C. Gray _____
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Senior Attorney
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