



March 5, 2026

VIA E-FILING

Michael D. Klein

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Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

**Re: Application of Veolia Water Pennsylvania, Inc.: Pursuant to Section 1102(a)(3) of the Pennsylvania: Public Utility Code, 66 Pa. C.S. § 1102(a)(3), for Approval of the Acquisition of Certain Real Estate Consisting of an Easement, in the Borough of Marysville, Perry County, and Request for Expedited Consideration
DKT No. A-2026-3059888**

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Response to TUS Data Request Set 1 in the above referenced matter.

If you have any questions regarding this filing, please contact me. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads "Michael D. Klein".

Michael Klein
Cozen O'Connor
Counsel for *Veolia Water Pennsylvania, Inc.*,

cc: Per Certificate of Service
Larry Finnicum, Regional President of Veolia Water Pennsylvania, Inc.
Michael Corona, Corporate Counsel
Paul T. Diskin, Director, Bureau of Technical Utility Services
Paul Zander, Water/Wastewater, Bureau of Technical Utility Services (pzander@pa.gov)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Veolia Water Pennsylvania, Inc., :
Pursuant to Section 1102(a)(3) of the Pennsylvania :
Public Utility Code, 66 Pa. C.S. § 1102(a)(3), for : Docket No.: A-2026-3059888
Approval of the Acquisition of Certain Real Estate, :
Consisting of an Easement, In the Borough of :
Marysville, Perry County, Pennsylvania :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the attached, upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

First Class Mail and Email:

Darryl Lawrence
Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
Email: ra-oca@paoca.org

Allison Kaster, Esq.
Director and Chief Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
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NazAarah Sabree, Esq.
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Matt Lapes
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Melanie El Atieh
Office of Consumer Advocate
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Harrisburg, PA 17101-1923
Email: melatieh@paoca.org

Respectfully,



Date: 3/5/2026

Michael Klein, Esq.
Counsel for *Veolia Water Pennsylvania, Inc.*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Veolia Water Pennsylvania, Inc., :
Pursuant to Section 1102(a)(3) of the Pennsylvania :
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Consisting of an Easement, In the Borough of :
Marysville, Perry County, Pennsylvania :

RESPONSE TO TUS DATA REQUEST SET 1

- A-1. Please provide evidence that Veolia's 2025 General Assessment Invoice balance has been paid.

RESPONSE:

A check for payment of the Assessment invoice amount of \$405,265.00 was mailed to the Department of Revenue, PO Box 61380, Harrisburg, PA 17106-1380 on February 25, 2026 (Check No. 00218182). This check is a replacement for the October payment that was lost in transit. Veolia apologizes for this inconvenience and believes that this will address any outstanding balance.

Response Provided by:

Michael Watkin, Director of Finance – Mid-Atlantic Region, of Veolia Water Pennsylvania, Inc. Provider's Verification is at the end of this document.

A-2. The Application's Page 1 indicated that Veolia intends to use an easement (Easement) on a portion of the site for the construction of a water booster pump station and equipment (Proposed Booster Station) to pump untreated water from the Susquehanna River to Veolia's water treatment plant (WTP) before it is distributed to Veolia's customers in its Marysville System. However, the Application's Section 9 indicated that the Proposed Booster Station must be located at a site that allows for the transfer of water from Veolia's Harrisburg pressure zone to the Marysville pressure zone. Also, the Application's Section 17 specified that Veolia's existing water booster pump station (Existing Pump Station) is beyond its useful service life and noted that the Existing Pump Station is a single point-of-failure for service interruptions to Marysville. Please clarify whether the Proposed Booster Station will be used for pumping treated water from Veolia's Harrisburg pressure zone to the Marysville pressure zone, or if it will pump untreated water from the Susquehanna River to Veolia's water treatment plant (WTP) before it is distributed to Veolia's customers in its Marysville System. If it is to pump untreated water, please also identify the Veolia WTP that it will convey untreated water.

RESPONSE:

Please see the following schematic and description clarifying the Proposed Booster Pump Station's position in the Harrisburg System:

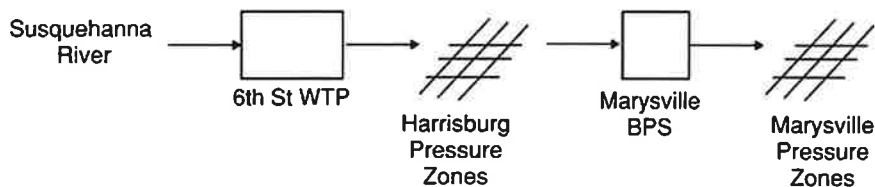


Figure A-2: Harrisburg-Marysville Schematic

The Susquehanna River serves as the primary source of supply for the 6th Street Water Treatment Plant. Finished water from the 6th Street WTP is pumped to the Harrisburg Pressure Zones. The Marysville Booster Pump Station delivers finished water from the Harrisburg Pressure Zone to the Marysville Pressure Zones.

Response Provided by:

*Philip Grapes, PE, Plant Program Manager-PA, of Veolia Water Pennsylvania, Inc.
 Provider's Verification is at the end of this document.*

- A-3. Please identify whether Veolia expects that the Proposed Booster Station and the Existing Pump Station will both be used to support the Marysville pressure zone or provide Veolia's timeline for decommissioning the Existing Pump Station after the Proposed Booster Station is constructed.

RESPONSE:

The Existing Booster Pump Station will be removed from service concurrent with commissioning and start-up of the Proposed Booster Pump Station. There is no planned overlap of simultaneous operation of two stations. The projected timeline is to initiate removal of the existing station equipment and structures within two months of completing construction activities at the proposed site, pending coordination with the owner of the property (Marysville Borough).

Response Provided by:

*Philip Grapes, PE, Plant Program Manager-PA, of Veolia Water Pennsylvania, Inc.
Provider's Verification is at the end of this document.*

- A-4. Please explain how Veolia determined that purchasing the Easement for the Proposed Booster Station would provide greater net public benefits than repairing and upgrading the Existing Pump Station.

RESPONSE:

The Existing Booster Pump Station is located on a small parcel owned by Marysville Borough and consists of a below grade vault. The site and location are illustrated in the attached. The physical space limitations present at the Existing Booster Pump Station do not allow for repairs or upgrades without an extended station shutdown period of three to six months. As illustrated in Figure A-2, the Marysville Booster Pump Station is the single source of supply for the Marysville Pressure Zones. There are no neighboring community water systems that could provide temporary water service to Marysville.

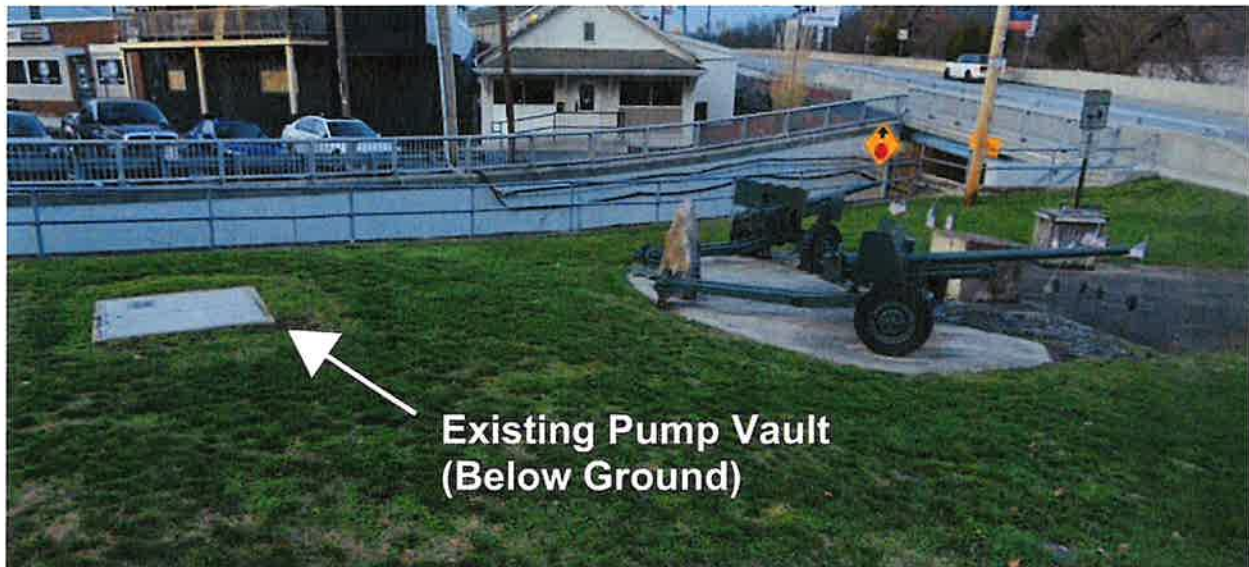
Without a feasible alternative to provide water to Marysville during a lengthy disruption of service caused by repairing or upgrading the Existing Booster Pump Station, Veolia elected to pursue the construction of a new station while temporarily keeping the existing station in-service. Providing a continuous supply of finished water to Marysville was determined to provide the greatest net public benefit.

Response Provided by:

*Philip Grapes, PE, Plant Program Manager-PA, of Veolia Water Pennsylvania, Inc.
Provider's Verification is at the end of this document.*

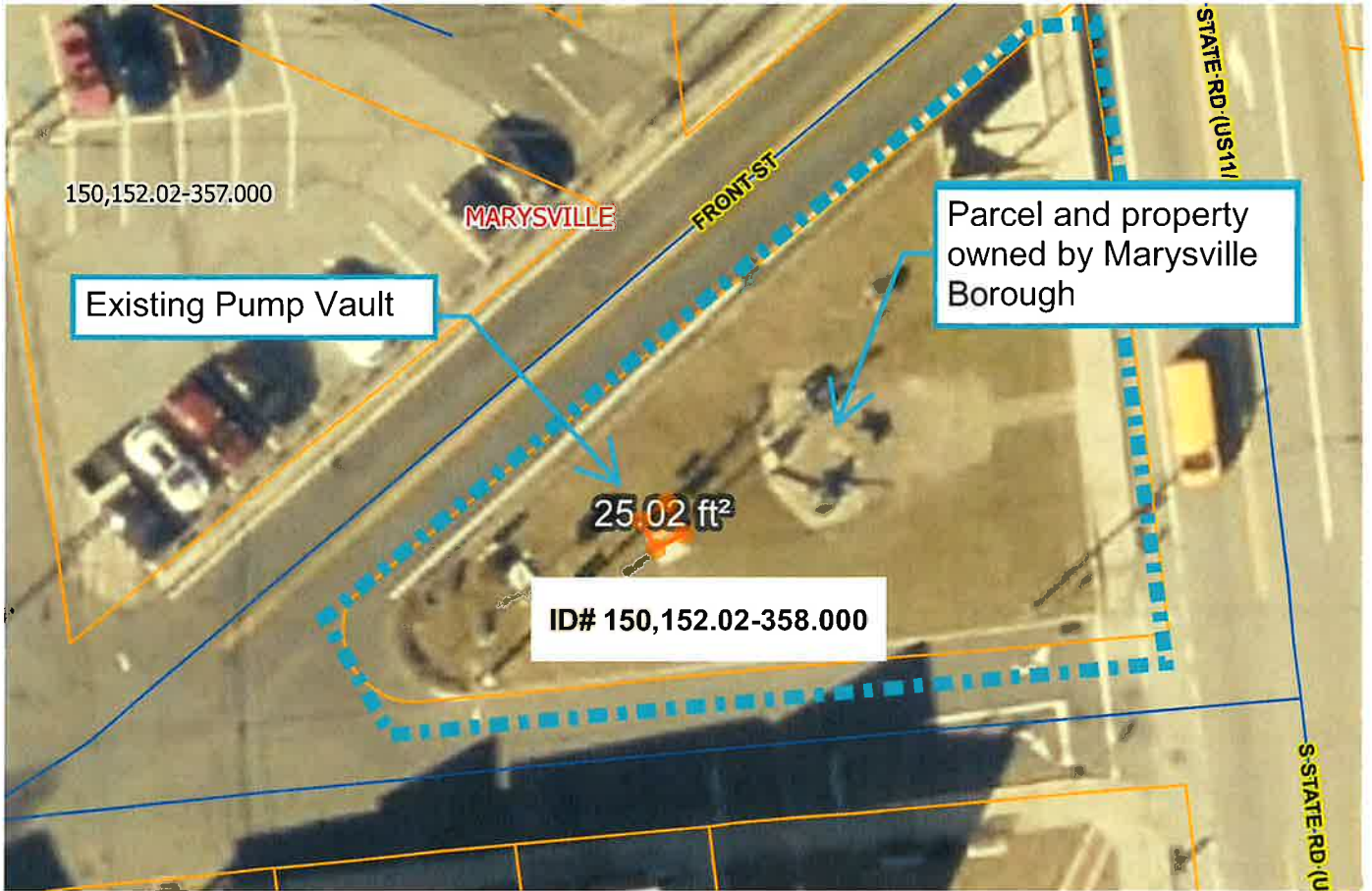
PUC Response
Item A-4: Existing Booster Pump Station

Existing Site, Street View



Classified as a Confined Space by OSHA. Veolia design guidance is to avoid Confined Spaces where possible for employee safety. Proposed booster pump station will be an at-grade building.

Parcel Map, Existing Site



A-5. The Application's Exhibit 5 included an opinion of probable cost for the Proposed Booster Station that identified approximately 300 linear feet of proposed water main. Also, the Application's Exhibit 2 included a copy of an Easement Plan, and the Application's Exhibit 3, Figure 1 appears to include a map of existing water mains. However, the Easement Plan and the map of existing water mains do not clearly identify the location or route of the proposed water main. Please provide a map or plan of suitable scale that depicts the location or route of the 300 linear feet of proposed water main and Veolia's existing water mains that will convey water to and from the Proposed Booster Station.

RESPONSE:

The Existing Booster Pump Station is connected to the Susquehanna River-crossing pipe by an 8-inch Asbestos Cement pipeline located in South Main Street in Marysville. This pipe is currently being replaced by a 12-inch ductile iron main under a separate project.

The Proposed Booster Pump Station is on a property located along South Main Street. This project includes approximately 300 linear feet of 12-inch ductile iron yard pipe to connect to the new main directly adjacent to the property. Please see the following figures for the location of the site and system piping.

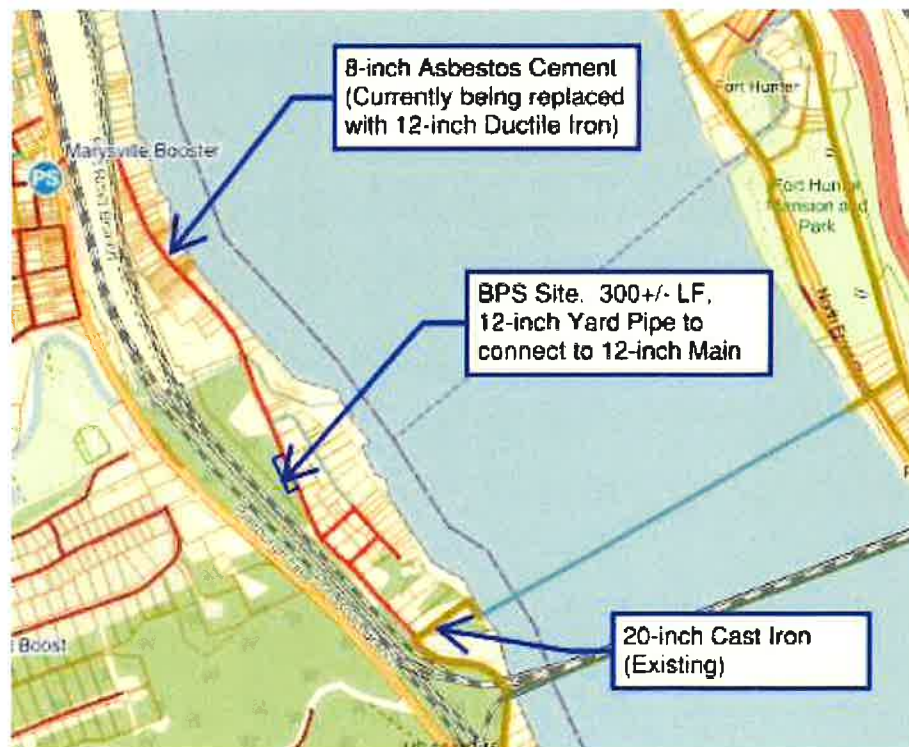


Figure A-5a: BPS Site and System Piping

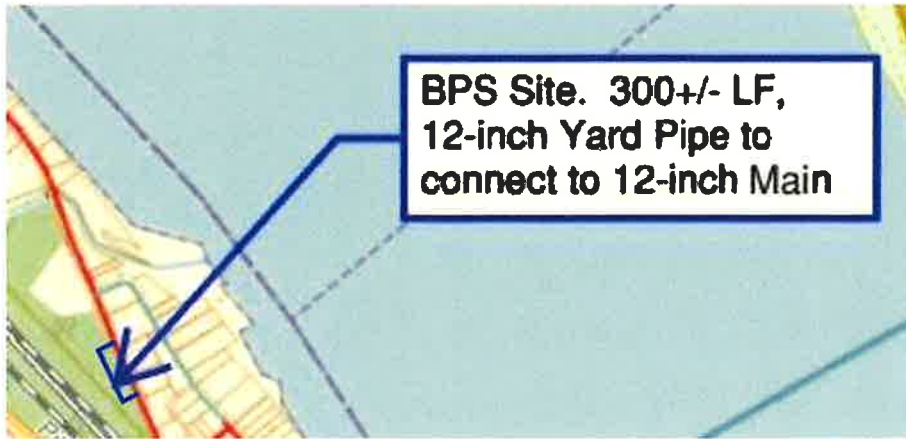


Figure A-5b: BPS Site and System Piping (Detail)

Response Provided by:

*Philip Grapes, PE, Plant Program Manager-PA, of Veolia Water Pennsylvania, Inc.
Provider's Verification is at the end of this document.*

- A-6. Please provide a breakdown of the pipe sizes and material types of the water mains to be installed as part of the project, including any to be used to pump untreated water from the Susquehanna River to Veolia's WTP.

RESPONSE:

The preliminary piping included in this project is in preliminary design.

- 300 +/- LF of 12-inch Ductile Iron Pipe (Connection of station to main)
- Four (4) 12-inch Ductile Iron Gate Valves
- 150 +/- LF of 8-inch Ductile Iron Pipe (Process piping inside station)
- Six (6) 8-inch Ductile Iron Butterfly Valves
- Three (3) 8-inch Ductile Iron Check Valves
- One (1) 20-inch Ductile Iron Surge Anticipator Valve

As previously stated, the pipe and materials being installed as part of the current transmission main project are separate from Booster Pump Station project and are not enumerated here or included in the project's Opinion of Probable Cost.

Response Provided by:

*Philip Grapes, PE, Plant Program Manager-PA, of Veolia Water Pennsylvania, Inc.
Provider's Verification is at the end of this document.*

A-7. The Application's Section 6 specified that the estimated cost for the Proposed Booster Station is \$3.2 million. Please identify the sources of funds that Veolia will use to finance this \$3.2 million investment (i.e., debt and/or equity, etc.).

RESPONSE:

The Company will use the general corporate funds through the Company's money pool agreement to finance this investment.

Response Provided by:

Anupa Jacob, VP, Controller and Chief Accounting Officer, of Veolia Water Pennsylvania, Inc. Provider's Verification is at the end of this document.

- A-8. The Application's Section 9 indicated that Veolia is proposing to acquire the Easement for \$90,000. Please provide Veolia's tentative journal entries, by major plant account, for booking the acquisition of the Easement, related capitalized transaction, and closing costs, in accordance with the National Association of Regulatory Utility Commissioners Uniform System of Accounts. Tentative journal entries must specify the anticipated sources of funds that Veolia will use to finance the transaction and closing costs (i.e., debt and/or equity, etc.).

RESPONSE:

The Company believes the following excerpts from the 1996 NARUC Class A Water Utility Uniform System of Accounts "USOA") are relevant.

24. Land and Land Rights.

The accounts for land and land rights include the cost of land owned in fee by the utility and rights, interests, and privileges held by the utility in land owned by others, such as leaseholds, easements, water and water power rights, diversion rights, submersion rights, rights of way, and other like interests in land. Do not include in the accounts for land, land rights, and rights of way costs incurred in connection with first clearing and grading of land and rights of way and the damage costs associated with the construction and installation of plant. Such costs shall be included in the appropriate plant accounts directly benefited.

As a result, the Company proposes the following accounting for the purchase of the land, boundary dispute fund and the easement:

	Dr.	Cr.
303.2 Land and Land Rights	\$90,000	
<i>Purchase price - Easement</i>		
303.2 Land and Land Rights	\$199,900	
<i>Purchase price - Estimated closing and transaction costs</i>		
131 Cash		\$90,000
<i>Purchase price - Easement</i>		
131 Cash		\$199,900
<i>Purchase price - Estimated closing and transaction costs</i>		

The Company will use the general corporate funds through the Company's money pool agreement to finance this investment.

Response Provided by:

Anupa Jacob, VP, Controller and Chief Accounting Officer, of Veolia Water Pennsylvania, Inc. Provider's Verification is at the end of this document.

- A-9. Please identify any permits, easements, and rights-of-way required to construct the proposed facilities, quantify the estimated cost of those permits, easements, and rights-of-way, and provide the status of each permit, easement, and right-of-way (e.g., received, applied for, not yet applied for, etc.).

RESPONSE:

The project's Opinion of Probable Cost includes \$100,000 for permitting. This includes both the application fees and the engineering costs for preparation of permit forms and supporting documents. Permits and associated costs have been preliminarily estimated as:

- Public Water Supply Permit, Major Amendment \$30,000
- Land Development and Stormwater Management \$40,000
- NPDES Permit, Construction \$15,000
- Municipal Building, Zoning, & Demolition Permits \$15,000

Response Provided by:

*Philip Grapes, PE, Plant Program Manager-PA, of Veolia Water Pennsylvania, Inc.
Provider's Verification is at the end of this document.*

A-10. Please explain how Application approval would impact rates.

RESPONSE:

The requested rate impact cannot yet be assessed. The Company is not requesting an adjustment to base rates at this time and any future ratemaking treatment would be determined by the Commission in a subsequent proceeding based on the evidentiary record developed at that time.

However, the Company expects that the approximately \$90,000 easement acquisition would have a *de minimis* effect on customer rates if any, when considered in the context of the Company's overall rate base and revenue requirement.

Response Provided by:

*Maryanne Hatch, VP, Rates and Regulatory Affairs, of Veolia Water Pennsylvania, Inc.
Provider's Verification is at the end of this document.*

- A-11. In supplemental information filed with the Commission, Veolia provided a letter from the Perry County Planning Commission (PCPC) dated January 21, 2026, (PCPC Letter) that indicated the PCPC waived the right to review the proposed land use. However, the PCPC Letter did not indicate if the Application is or is not consistent with the county comprehensive plan and applicable zoning ordinances. Please clarify if Veolia believes the Application is consistent with the county comprehensive plan and applicable zoning ordinances.

RESPONSE:

The relevant zoning map and section of the zoning ordinance for the Property in Marysville Borough is attached. The Property is located in the **R-2 General Residential** zoning district. Public utility buildings and facilities are a **Use Permitted by Conditional Use** when approval is granted by Borough Council.

Response Provided by:

Greg Rothman, MAI, CPE, CCIM, of RSR Appraisers & Analysts. Provider's Verification is at the end of this document.

The Borough's comprehensive plan is consistent with the county comprehensive plan in accordance with the Pennsylvania Municipalities Planning Code, Act No. 247, Section 301.4(a-b). Perry County does not have a county-wide zoning ordinance.

The Borough's Land Use Letter response indicated that Veolia's application is consistent with the applicable comprehensive plans and zoning ordinances. Therefore, Veolia believes the Application is consistent with the Perry County comprehensive plan.

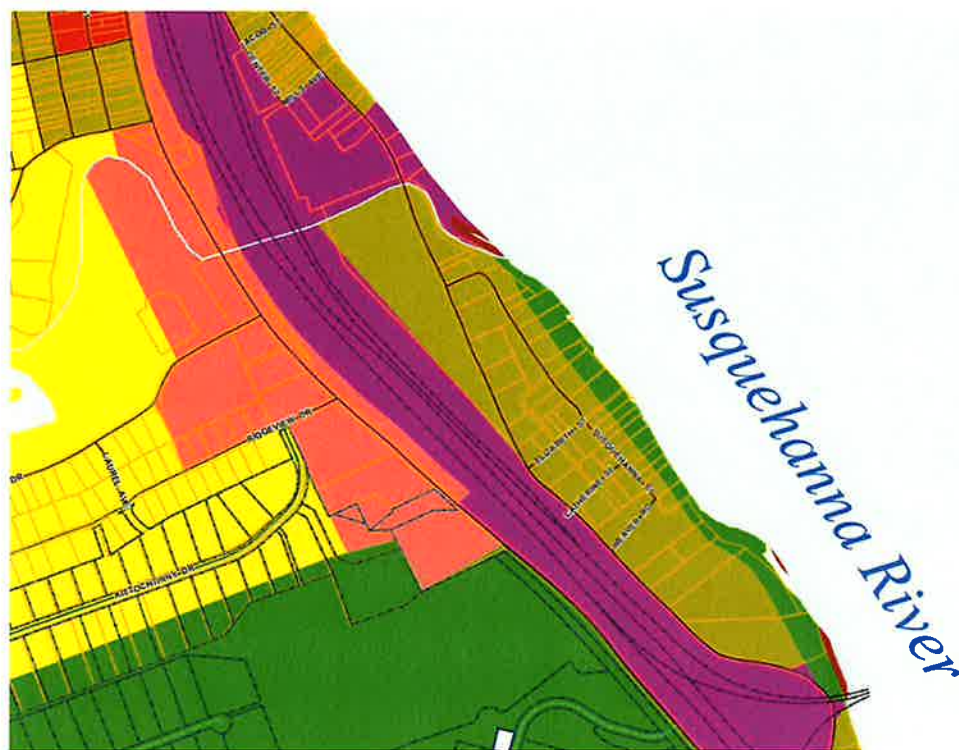
Response Provided by:

Philip Grapes, PE, Plant Program Manager-PA, of Veolia. Provider's Verification is at the end of this document.

PUC Response

Item A-11: Borough Zoning Map and Ordinance (Excerpt)

ZONING MAP



Zoning: The subject property is in the **R-2 General Residential** zoning district in Marysville Borough, Perry County.

§ 27-402. R-2 Residential.

1. **Intent.** To provide for, and encourage, residential development of moderate density and variety, along with certain other kinds of uses and activities, consistent with existing land use patterns and the Borough's community development objectives.

2. **Uses by Right.** The following uses, buildings, and activities are permitted by right within an R-2 District:

- A. Single-family detached dwellings.
- B. Single-family semi-detached dwellings.
- C. Single-family attached dwellings in accordance with the provisions of § 27-402(7) of this Part.
- D. Two-family detached dwellings.
- E. Two-family semi-detached dwellings.
- F. Garden apartments in accordance with the provisions of § 27-402(8) of this Part.
- G. Parks, playgrounds, and other recreational uses (noncommercial).
- H. Elementary and secondary schools.
- I. Churches and other buildings for worship.
- J. Funeral homes.

- K. Professional offices.
- L. Medical and dental clinics.
- M. Hospitals and sanitariums.
- N. Government administrative buildings.
- O. Borough buildings and facilities.
- P. Libraries, fire protection buildings, and ambulance buildings.
- Q. Planned residential development (PRD) in accordance with the provisions of Part 12 of this Chapter.

R. Accessory buildings and activities customarily incidental to the above permitted uses, when located on the same lot.

S. No-impact home-based businesses as defined in this Chapter. [*Ord. 553*]

T. Home occupations in accordance with the provisions of Part 8, General and Supplemental Regulations. [*Ord. 551*]

3. **Uses Permitted by Conditional Use.** The following uses, buildings, and activities are permitted by conditional use when approval is granted by Borough Council:

A. [*Reserved*] [*Ord. 551*]

B. Cluster development in accordance with the provisions of § 27-1104 of this Chapter.

C. Conversion apartments in accordance with the provisions of § 27-1103 of this Chapter.

D. Group dwellings in accordance with the provisions of § 27-1105 of this Chapter.

E. Mid-rise apartments in accordance with the provisions of § 27-1106 of this Chapter.

F. Mobile home parks in accordance with the provisions contained in the Borough Subdivision and Land Development Ordinance [Chapter 22].

G. Clubs, lodges and fraternal organizations (noncommercial) in accordance with the provisions of § 27-1102 of this Chapter.

H. Public utility buildings and facilities in accordance with the provisions of § 27-1110 of this Chapter.

I. Uses which, in the opinion of the Borough Council, are of the same general character as set forth in this Part, § 27-401(2) and (3) of this Chapter, and which will not be detrimental to the intended purposes of this Chapter.

J. Elderly housing projects in accordance with the provisions of subsection (9) of this Section.

VERIFICATION

I, Anupa Jacob hereby state that the facts above set forth 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).

Signature: *Anupa Jacob*

Title: VP, Controller and Chief Accounting Officer

Date: 3/4/2026

VERIFICATION

I, Maryanne Hatch, hereby state that the facts above set forth 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).

Signature: 

Title: VP Rates - Regulatory Affairs - Vedia Regulated Water

Date: 2-25-2026

VERIFICATION

I, MICHAEL WATKIN, hereby state that the facts above set forth 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).

Signature: _____



Title: MID ATLANTIC DIRECTOR OF FINANCE

Date: FEBRUARY 26, 2026

VERIFICATION

I, W. Greg Rothman, MAI, CCIM, CPE, hereby state that the facts above set forth 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).

Signature:  _____

Title: Associate Broker/General Appraiser

Date: 2-25-2026

VERIFICATION

I, Philip Matthew Grapes, PE hereby state that the facts above set forth 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).

Signature: Philip Matthew Grapes, PE 083093

Title: Plant Program Manager – PA, Veolia

Date: 3/4/26