



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 2 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, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
Email: [ra-oca@paoca.org](mailto:ra-oca@paoca.org)

Allison Kaster, Esq.  
Director and Chief Prosecutor  
Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2 West  
Harrisburg, PA 17120  
Email: [Akaster@pa.gov](mailto:Akaster@pa.gov)

NazAarah Sabree, Esq.  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
Email: [ra-sba@pa.gov](mailto:ra-sba@pa.gov)

Brent Kaufman  
407 Mountain Road  
Marysville, PA 17053  
Email: [rockproofboats@embarqmail.com](mailto:rockproofboats@embarqmail.com)

Matt Lapes  
Water/Wastewater Section  
Bureau of Technical Utility Services  
Commonwealth Keystone Building  
400 North Street, 2 West  
Harrisburg, PA 17120  
Email: [mlapes@pa.gov](mailto:mlapes@pa.gov)

Melanie El Atieh  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
Email: [melatieh@paoca.org](mailto:melatieh@paoca.org)

Respectfully,



Date: 3/5/2026

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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Marysville, Perry County, Pennsylvania :

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**RESPONSE TO TUS DATA REQUEST SET 2**

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A-12. The Application's Confidential Exhibit 1 included a copy of Veolia's Easement Purchase Agreement. The Agreement's Section 12.b. specified that at closing, the Seller shall deliver to the Buyer executed instruments and documents including the Deed of Easement attached to the Agreement as Exhibit B. However, the Agreement does not include a copy of Exhibit B. Please provide a copy of the Agreement's Exhibit B.

**RESPONSE:**

The Deed of Easement, which is a component of the Purchase Agreement as Exhibit B, is attached to this response.

*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.*

# **Exhibit**

# Deed of Easement

**CONFIDENTIAL**

## 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