



COMMONWEALTH OF PENNSYLVANIA

April 7, 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 Pennsylvania, Inc. & Office of Consumer Advocate v. Veolia Water Pennsylvania, Inc. / Docket Nos. C-2025-3058757 & C-2025-3058865

Enclosed please find the Prehearing Memorandum, on behalf 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/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

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. | : | |

**PREHEARING MEMORANDUM
OF THE OFFICE OF SMALL BUSINESS ADVOCATE**

I. INTRODUCTION

The Office of Small Business Advocate (“OSBA”) is authorized to represent the interests of small business customers of utility services before the Pennsylvania Public Utility Commission (“Commission”) pursuant to the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 – 399.50 (“the Act”). To discharge this statutory duty, the Small Business Advocate deems it necessary to participate as a party to these proceedings. Representing the OSBA in the above-referenced matter is Assistant Small Business Advocate Rebecca Lyttle. Please address all correspondence in this matter as follows:

Rebecca Lyttle, Esq.
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
relyttle@pa.gov

II. FILING BACKGROUND

On November 19, 2025, the OSBA filed a Complaint against Veolia Water Pennsylvania, Inc. (“VWPA” “Company”), which was assigned Docket No. C-2025-3058757. On November 25, 2025, the Office of Consumer Advocate (“OCA”) filed both a Notice of Intervention for OSBA docket C-2025-3058757 and their own Formal Complaint which was assigned Docket No. C-2025-3058865.

On December 11, 2025, VWPA filed a Preliminary Objection to the OSBA Complaint along with an Answer and New Matter at Docket No. C-2025-3058757. On December 16, 2025, OSBA filed an Answer to VWPA Preliminary Objections. On December 16, 2025, VWPA filed a Motion for Consolidation of the two dockets.

On January 13, 2026, the Honorable Chad L. Allensworth granted the consolidation of both dockets under the OSBA docket C-2025-3058757. On January 21, 2026, the OSBA filed its Reply to New Matter.

III. IDENTIFICATION OF WITNESS

The OSBA is in the process of naming their expert witness to this matter.

IV. TENTATIVE ISSUES

The OSBA initiated this proceeding to assure that the interests of VWPA’s Small Business customers are protected.

After an initial review of the information provided concerning alleged violations, the OSBA has identified the following list of issues that it will evaluate in this proceeding:

- (1) When the water discoloration began and ended.
- (2) The number of Small Business customers in VWPA’s service territory.

- (3) Whether VWPA violated, 66 Pa. C.S. § 1501, to provide adequate, efficient, safe, reasonable, and reliable service to its customers.
- (4) Whether VWPA complied with regulated drinking water standards, including reporting requirements.
- (5) Whether VWPA failed to take timely corrective action once discoloration issues were known.
- (6) Whether VWPA customer service employees were trained adequately to respond to Small Business inquiries and/or complaints about water discoloration.
- (7) Whether adequate remedial measures were awarded to VWPA's Small Business customers.
- (8) Whether VWPA provides its Small Business customers with information about the OSBA's contact information by means of its customer service team, by social media, and/or its website.

The OSBA reserves the right to pursue additional issues that may arise throughout this proceeding.

IV. SERVICE OF DOCUMENTS

In accordance with 52 Pa. Code § 1.54(b)(3)(i), the OSBA agrees to accept electronic mail delivery of documents by all parties, directly, without a link or password need to retrieve said documents, by on the due date¹ as satisfying the in-hand requirement.

V. DISCOVERY

The OSBA does not propose any discovery modifications.

¹ In accordance with 52 Pa. Code § 1.56(a)(5), documents must be received by 4:30 pm.

VI. SETTLEMENT

The OSBA notes the parties have started settlement discussions.

VII. HEARING AND BRIEFING SCHEDULE

At the time of this writing, the OSBA has approved of VWPA's proposed procedural schedule.

The OSBA requests the scheduling of both in person and telephonic Public Input Hearings.

Respectfully submitted,

/s/ Rebecca Lyttle

Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

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

Dated: April 7, 2026

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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: April 7, 2026

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