

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE JOINT PETITION)
OF VEOLIA WATER DELAWARE, INC. AND)
THE CITY OF NEWARK PURSUANT TO 26)
DEL. C. §215, TO TRANSFER VEOLIA WATER)
DELAWARE, INC.'S RIGHTS UNDER ITS)
CERTIFICATE OF PUBLIC CONVENIENCE AND) PSC DOCKET NO. 23 -
NECESSITY TO THE CITY OF NEWARK TO)
PROVIDE WATER SERVICE TO CERTAIN)
PROPERTIES)
(Filed August 31, 2023))

JOINT PETITION PURSUANT TO 26 DEL. C. §215 TO TRANSFER THE RIGHTS OF
VEOLIA WATER DELAWARE, INC. UNDER ITS CERTIFICATE OF PUBLIC
CONVENIENCE AND NECESSITY TO THE CITY OF NEWARK TO PROVIDE WATER
SERVICE TO CERTAIN PROPERTIES

1. This is a joint petition pursuant to the provisions of 26 *Del. C.* §215 (a)(1) and (d) (“Petition”), by Veolia Water Delaware, Inc. (formerly SUEZ Water Delaware, Inc.)¹ (“Veolia” or the “Company”) and the City of Newark (“Newark” or “City”) to transfer the rights of Veolia under its certificate of public convenience and necessity (“CPCN”) as it relates to certain properties as further described herein to the City of Newark, and to revise the official maps reflecting the Company’s service territory to reflect that Veolia will no longer have the right to serve or provide water service to certain properties as more specifically described in this Petition.

2. Veolia is a public utility that has provided water service in the State of Delaware for twenty-seven (27) years pursuant to a CPCN issued in 1995 for its entire service territory.

3. The City of Newark is a municipal corporation of the State of Delaware that provides water service within and outside of the municipal limits of Newark through its

¹ The transaction whereby Veolia acquired SUEZ was consummated on January 18, 2022. A change in control of SUEZ Water Delaware, Inc. was approved by the Delaware Public Service Commission pursuant to Order No. 9894, in Docket No. 21-0436, dated October 6, 2021.

Department of Public Works and Water Resources as a municipal public utility pursuant to the City of Newark Charter and applicable law.

4. By way of background, via act of the General Assembly, Newark has maintained the authority to provide water service to customers residing outside of its municipal boundaries since 1925.² By amendment of its municipal Charter (the “Charter”) in 1955, Newark obtained the right to provide water service to properties located within ten (10) miles outside of its municipal boundaries.³ The language of the City Charter, as amended, provides: “The city may, in its discretion, distribute water throughout all that territory included within 10 miles of the city limits.” Newark City Charter § 405.⁴

5. In the 1950s and 1960s, the Delaware Public Service Commission (“Commission”) had the authority to issue CPCN’s for water service. That responsibility was later transferred to the Delaware Department of Natural Resources and Environmental Control (“DNREC”) in the 1970s, and back to the Commission in 2001. At all times relevant thereto, Newark (and all other municipal water service providers) was not and are not subject to the jurisdiction of the DNREC or the PSC for the establishment or approval of municipal water service territories. As such, Newark was not required – at any time - to file and request a CPCN for its water service territory with the PSC or with DNREC.

6. Pursuant to the authority in Newark’s Charter, authorizing it to serve up to ten miles outside the City limits, Newark provided water service (and serves) numerous properties outside

² The pertinent provisions of the 1925 General Assembly authorization are attached as Exhibit “A.”

³ The pertinent provisions from the City of Newark’s 1955 Charter Amendment are attached as Exhibit “B.”

⁴ The City’s Charter can be viewed at:
https://library.municode.com/de/newark/codes/code_of_ordinances?nodeId=CHNE

its municipal limits - the connection of which happened at various times over the years dating back to 1955. See *In re Artesian Water Co.*, 189 A.2d 435 (Del. Super. 1963).

7. When Veolia's predecessor obtained a CPCN for properties outside of the City in 1995, Newark already provided water service to certain of those properties within the area of the CPCN granted to Veolia. Newark continued to serve those properties without objection but did not expand its service to other properties within the area covered by Veolia's CPCN. As such, Veolia and Newark have each provided water service to properties located inside and outside of the municipal limits of the City of Newark within the service territory covered by Veolia's CPCN.

8. In 2021, an issue arose as to whether Veolia or Newark provided water service to that certain property located at 1364 Marrows Road, Newark, Delaware (the "Property"), as both the Company and Newark claimed that they had provided water service to some portion of the Property at various points in time.

9. On August 26, 2021, SUEZ (now Veolia) filed an informal complaint with the Commission claiming a right to provide water service to the Property, which Newark opposed.

10. On September 8, 2021, Newark filed an action against SUEZ (now Veolia) in the Court of Chancery pertaining to the provision of water service to the Property.

11. Veolia and Newark ultimately settled the matter regarding water service to the Property, agreed to a formula for resolving disputes, and both the informal complaint filed with the Commission and the Chancery Court action were dismissed.

12. As part of the settlement, Veolia and Newark also agreed to address which utility provided water service to other properties located within or outside the City of Newark municipal boundary (which was also located within the area of the Veolia CPCN) and, upon making such determination, to formalize this arrangement through the Commission so that the official maps for

water service kept by the Commission could be properly modified and the rights to service those properties already served by the City would be transferred to the City.

13. Veolia and Newark agree that Newark will provide water service to the Property and that any rights that Veolia may have to service the Property pursuant to Veolia's CPCN should be transferred to Newark.

14. In addition, after further researching the issue, Veolia and Newark have determined that there are certain other properties located both inside and outside the municipal limits of the City of Newark, as listed on the attached Exhibit "C" (the "Properties"), which are located within the service territory covered by Veolia's CPCN but to which Newark has provided water service prior to the issuance of Veolia's 1995 CPCN and to which Newark continues to provide water service and to which Veolia has never provided water service. As such, Veolia desires to transfer its rights under the CPCN pursuant to 26 *Del. C.* §215 (a)(1) and (d), as it relates to the provision of water services to the Properties, to the City of Newark. As a result of such transfer of rights, Veolia's CPCN shall be modified accordingly to remove the Properties and the associated maps on record with the Commission shall reflect that water service is provided to the Properties by Newark, consistent with existing practice.

15. For purposes of this Joint Application, the contacts for Veolia and the City are:

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Newark, DE 19711
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16. Veolia and Newark submit that the transfer of rights under Veolia's CPCN to the City of Newark as it relates to the Property and the Properties are in accordance with law, for a proper purpose and consistent with the public interest. Newark has been providing water service

to a portion of the Property and exclusive water service to the Properties prior to the issuance of Veolia's 1995 CPCN, has the necessary infrastructure in place to continue to provide water service to the Property and the Properties, and it does not make economic sense to terminate Newark's existing service to the Property and the Properties.

WHEREFORE, Joint Petitioners, Veolia Water Delaware, Inc. and the City of Newark respectfully request that the Public Service Commission approve the transfer of Veolia's rights under its CPCN to serve the Property and the Properties to the City of Newark and that the associated service territory maps be revised accordingly, together with such other and further relief as the Commission deems appropriate.



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Counsel for City of Newark

Dated: August 31, 2023

EXHIBIT "A"

SELECTED PROVISIONS OF THE CITY OF NEWARK'S 1925 CHARTER

CHAPTER 128

CITIES AND TOWNS

AN ACT to authorize the Council of Newark, Delaware, to extend its water supply system beyond the limits of said town.

Be it enacted by the Senate and House of Representatives of the State of Delaware in General Assembly met (two-thirds of the members elected to each branch thereof concurring):

Section 1. That the Council of Newark, Delaware, be and it is hereby authorized and empowered to build and extend its water supply system outside the limits of the said Town of Newark, and to lay its pipes and conduits for carrying said water along and under any street or road outside of the said Town of Newark, in New Castle County, adjacent to and leading into the said Town.

Section 2. And whenever necessary, it may acquire, by agreement with the owner or owners, the right to lay and maintain the said pipes and conduits over private property, outside of the limits of the said Town.

Section 3. The Council of Newark is hereby given, and it shall be deemed to have any and all other powers required or which may be necessary to build, construct, operate and maintain said water pipes and conduits, and to make any and all necessary conditions and agreements with reference thereto, and it shall have the same control and jurisdiction by ordinance over said pipes and conduits as if they were located within the limits of said Town of Newark, with full power to prevent, by ordinance or otherwise, any injury to said pipes and conduits.

Section 4. The Council of Newark shall have power to sell water to persons or corporations along or adjacent to its water pipes or conduits, so laid and maintained without the limits of the said Town of Newark, on such terms and under such restrictions as it shall, from time to time, provide.

Approved March 25, A. D. 1925.

EXHIBIT "B"

**SELECTED PROVISIONS OF THE 1955 AMENDMENT
TO THE CITY OF NEWARK'S CHARTER**

CHAPTER 127

NEWARK

AN ACT TO AMEND AN ACT ENTITLED "AN ACT CHANGING THE NAME OF THE 'TOWN OF NEWARK' TO THE 'CITY OF NEWARK' AND ESTABLISHING A CHARTER THEREFOR" BY PERMITTING THE SALE OF WATER OUTSIDE OF THE CITY LIMITS.

Be it enacted by the General Assembly of the State of Delaware (two-thirds of all Members elected to each House concurring therein):

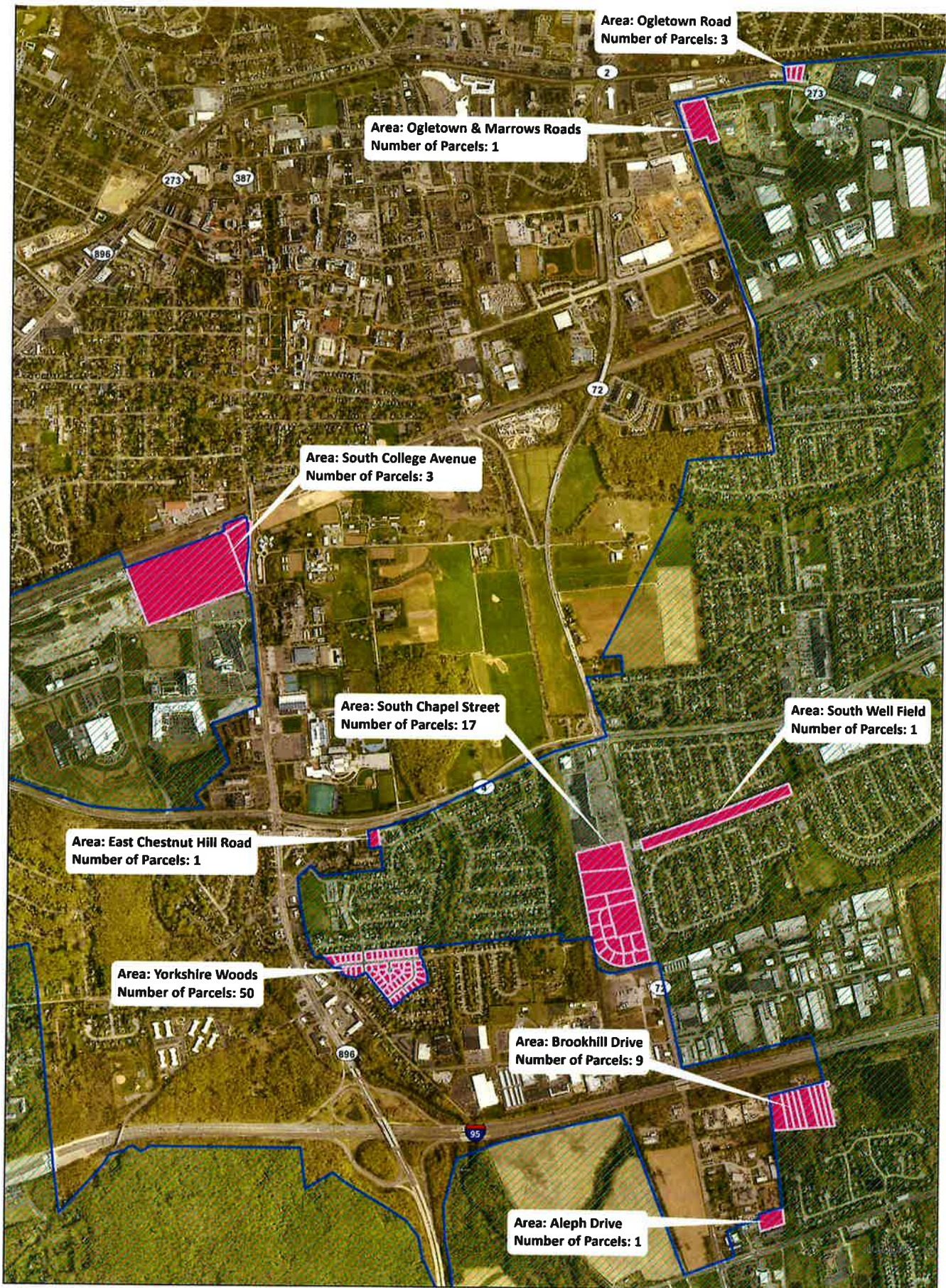
Section 1. Section 35 of Chapter 152 of Volume 48, Laws of Delaware, is amended by adding at the end thereof a new paragraph as follows:

The City of Newark may, in its discretion, distribute water throughout all that territory included within ten miles of the boundary thereof. The Council shall determine the person or persons, firm or firms, corporation or corporations, to which it shall distribute water throughout said territory included within ten miles of the boundary of said corporate limits; shall fix the rates therefor, shall regulate the use of said water, and shall supply the same upon such terms and conditions as may be agreed upon by the Council and said person or persons, firm or firms, corporation or corporations. The City of Newark shall have and exercise all the powers and authority necessary to the accomplishment of said distribution of water throughout the territory included within ten miles of the boundary of said corporate limits as it now has and possesses in the installation, operation and maintenance of its water system in the City of Newark and in the distribution by it of water within the City limits, including the authority and power to acquire by purchase or condemnation such land and property as may be necessary therefor.

Approved May 18, 1955.

EXHIBIT "C"

**LIST OF PROPERTIES FOR WHICH THE RIGHTS TO PROVIDE WATER SERVICE
ARE BEING TRANSFERRED FROM VEOLIA WATER DELAWARE, INC. TO THE
CITY OF NEWARK**





CITY OF NEWARK
DELAWARE

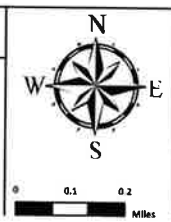
CON Water
Served Parcels in
Suez CPCN

October 2021

Overview Map

LEGEND

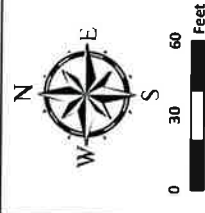
-  Suez CPCN
-  City Served Parcels In Suez CPCN

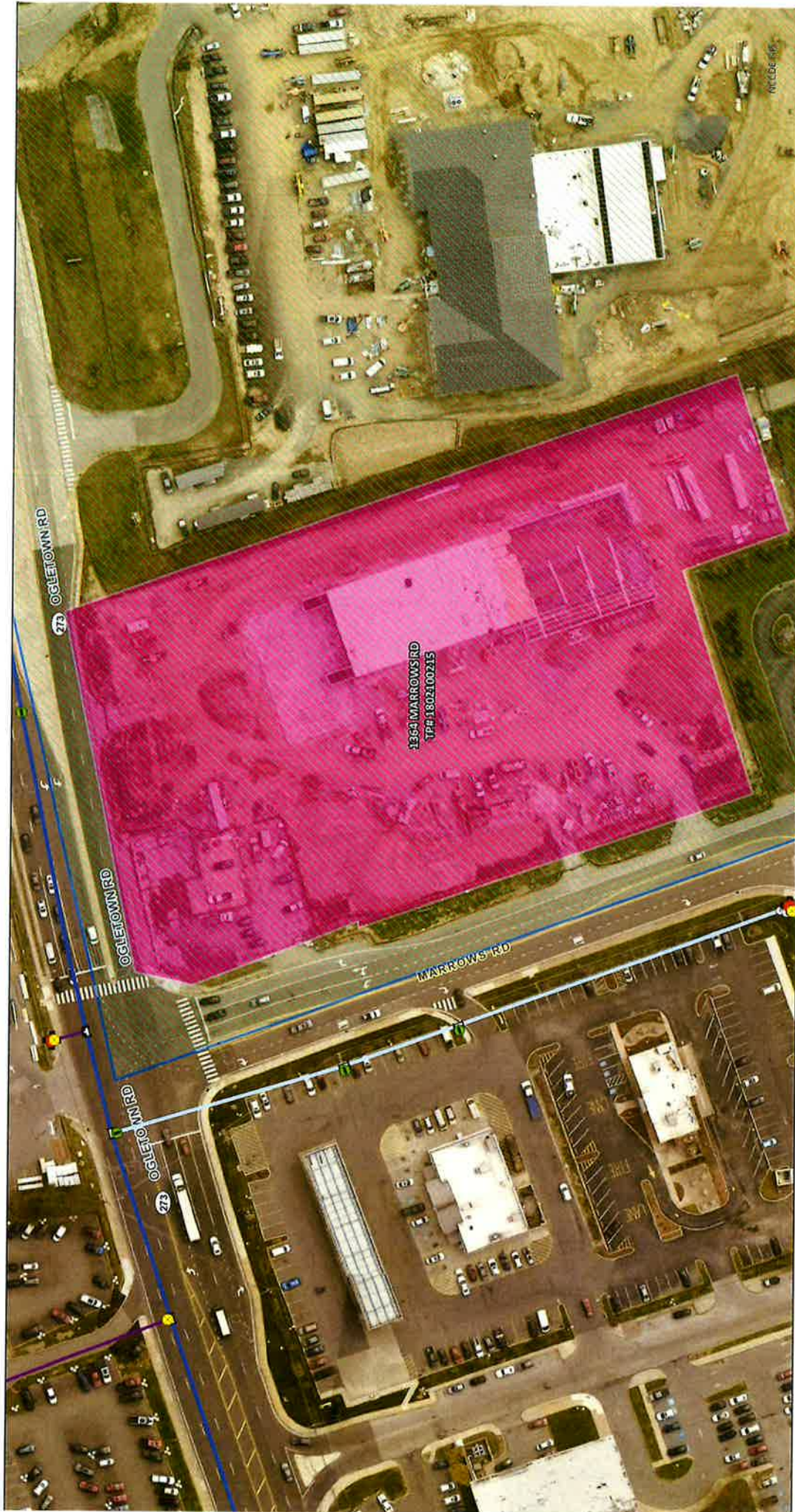




Ogletown Road

- LEGEND**
- Suez CPCN
 - City Served Parcels in Suez CPCN
 - Control Valve
 - Blowoff
 - Air Release
 - Pressure Reducer
 - Simple Check
 - System Valve
 - Open
 - Open
 - Hydrant
 - In Service
 - Other System Valve
 - Hydrant Isolation Valve
 - Tee
 - Cap
 - Reducer
 - Casing
 - Water Main (Diameter, Owner)
 - 6", City of Newark
 - 10", City of Newark
 - All Sizes, SUEZ North America



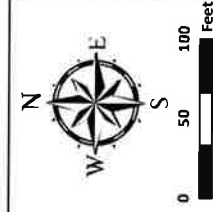


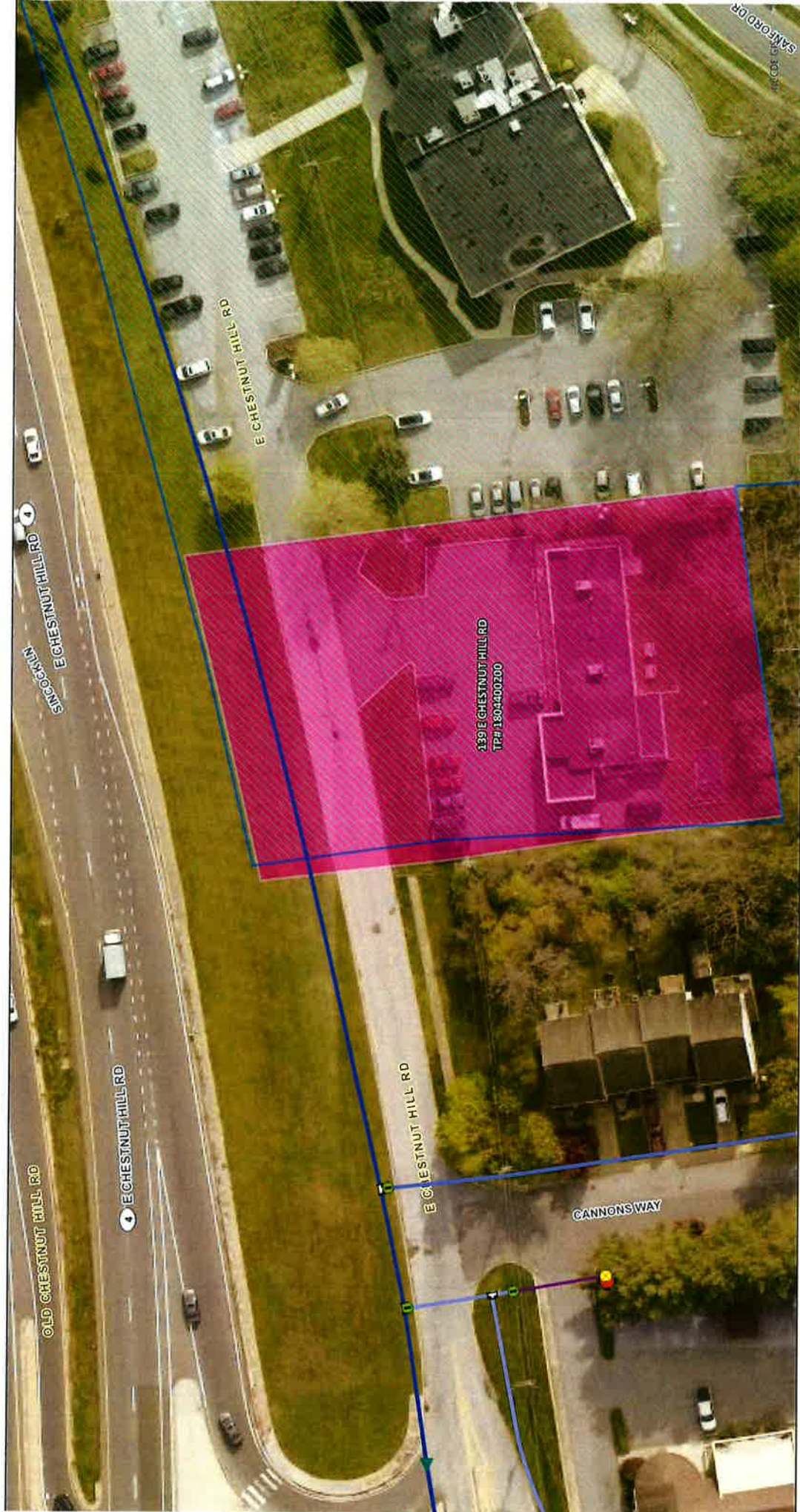
CITY OF NEWARK
DELAWARE

CON Water
Served Parcels in
Suez CPCN
October 2021

- LEGEND**
- Suez CPCN
 - City Served Parcels In Suez CPCN
 - System Valve
 - Open
 - Hydrant
 - In Service
 - Other System Valve Fitting Water Main (Diameter, Owner)
 - Bend
 - ⊥ Tee
 - 10", City of Newark
 - All Sizes, Private or Unknown
 - Water Lateral
 - Hydrant Isolation Valve
 - + In Service

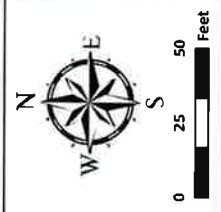
Ogletown & Marrows Roads

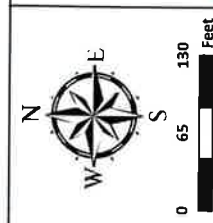




East Chestnut Hill Road

LEGEND	
	Suez CPCN
	City Served Parcels In Suez CPCN
	System Valve Open
	Other System Valve
	Control Valve
	Hydrant
	Water Main (Diameter, Owner)
	In Service
	6", City of Newark
	8", City of Newark
	12", City of Newark
	Water Lateral
	Fitting
	Tee
	Hydrant Isolation Valve
	Air Release





Yorkshire Woods

	8" City of Newark
	All Sizes, Private or Unknown
	Water Lateral
	Clip
	Hydrant
	In Service
	Fitting
	Other System Valve
	Open
	Broken Open
	Hydrant Isolation Valve
	Water Main (Diameter, Owner)
	Under 4", City of Newark
	4" - 5", City of Newark
	5" - 6", City of Newark
	6" - 8", City of Newark

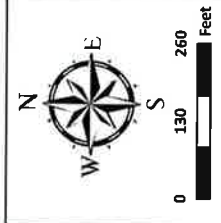
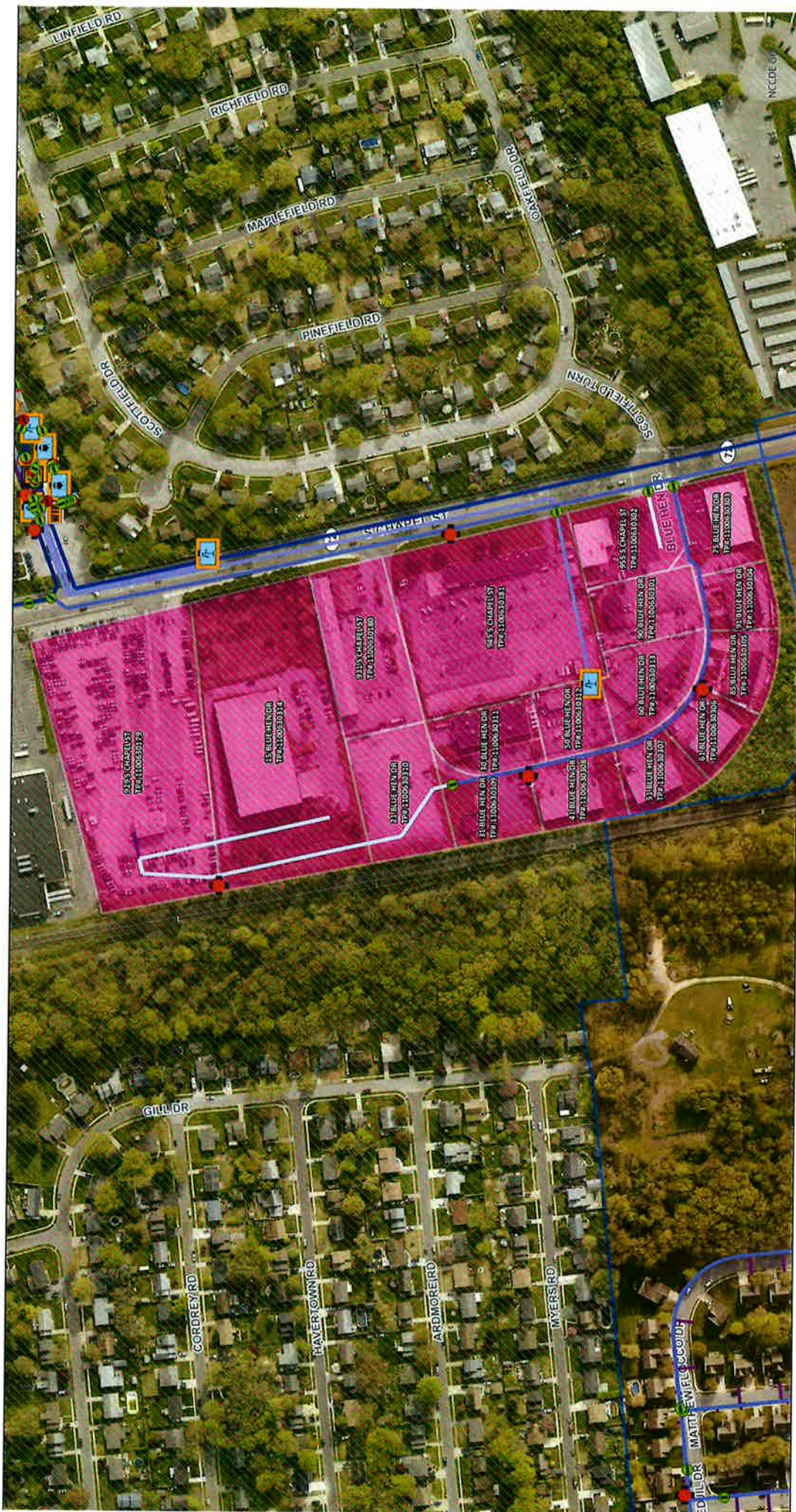
LEGEND

- Suez OPCN
- City Served Parcels In Suez OPCN
- Control Valve
- Blowoff

CITY OF NEWARK
DELAWARE

CON Water
Served Parcels in
Suez CPCN

October 2021



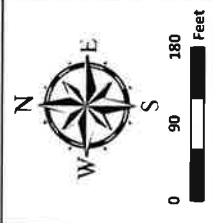
South Chapel Street

12", City of Newark	Hydrant	In Service	Network Structure	Meter Station
Over 12", City of Newark	Production Well	Pump Station	Tower	
All Sizes, Private or Unknown	Treatment Plant	Other	Water Main (Diameter, Owner)	6", City of Newark
Water Label	Suez CPCN	City Served Parcels In Suez CPCN	System Valve	Open
	Suez CPCN	City Served Parcels In Suez CPCN	System Valve	Closed

CITY OF NEWARK
DELAWARE

CON Water
Served Parcels in
Suez CPCN

October 2021



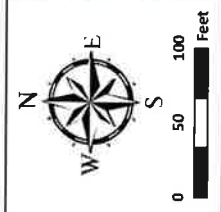
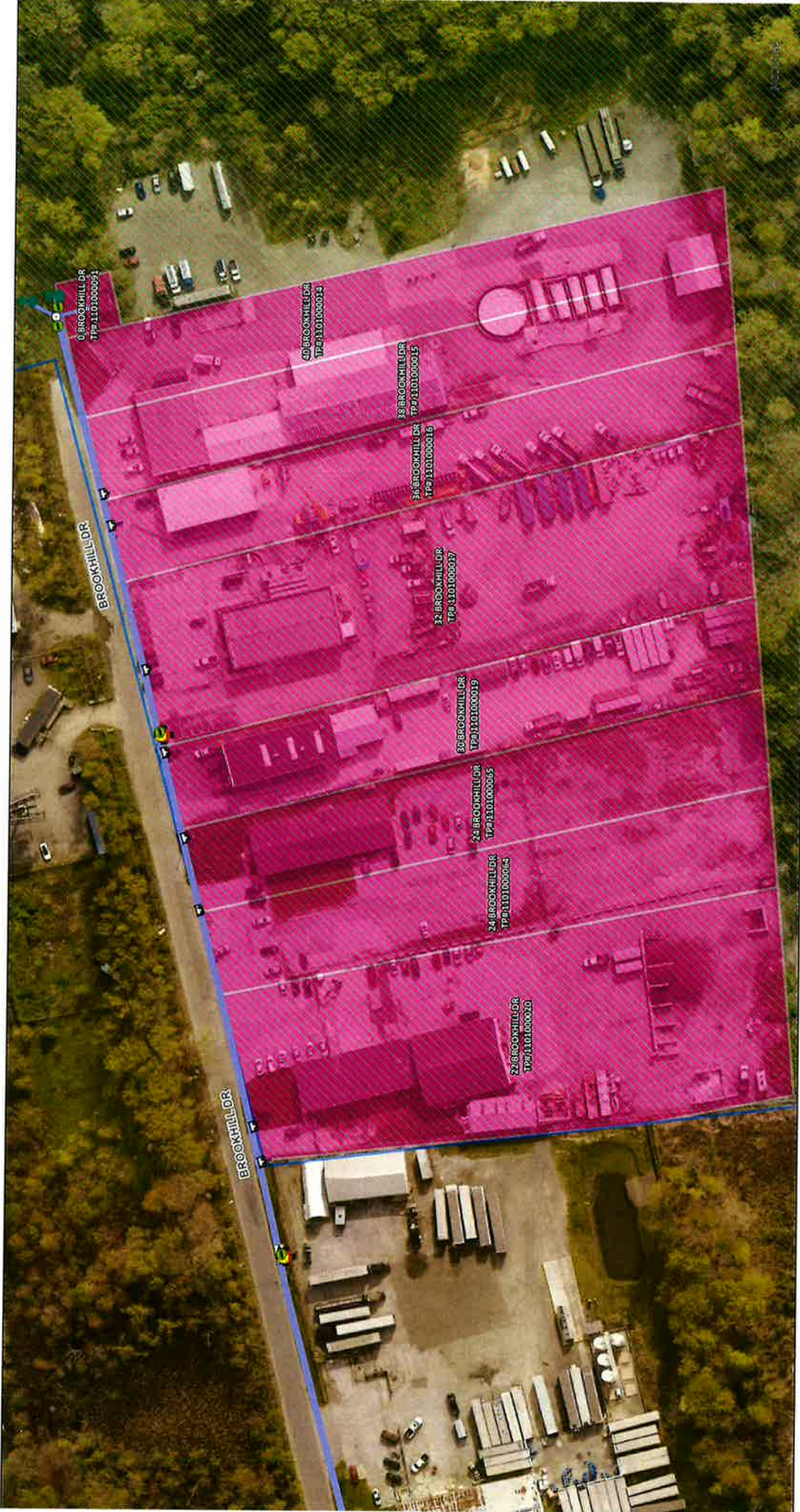
South Well Field

- LEGEND**
- Suez CPCN
 - City Served Parcels in Suez CPCN
 - System Valve
 - Open
 - Closed
 - Other System Valve
 - Hydrant Isolation Valve
 - Hydrant
 - In Service
 - Network Structure
 - Water Station
 - Production Well
 - Pump Station
 - Tower
 - Water Station
 - Production Well
 - Pump Station
 - Treatment Plant
 - Other
 - Water Main (Diameter, Owner)
 - 6", City of Newark
 - 8", City of Newark
 - 12", City of Newark
 - Over 12", City of Newark
 - Unknown, City of Newark
 - Water Lateral

CITY OF NEWARK
DELAWARE

CON Water
Served Parcels in
Suez CPCN

October 2021



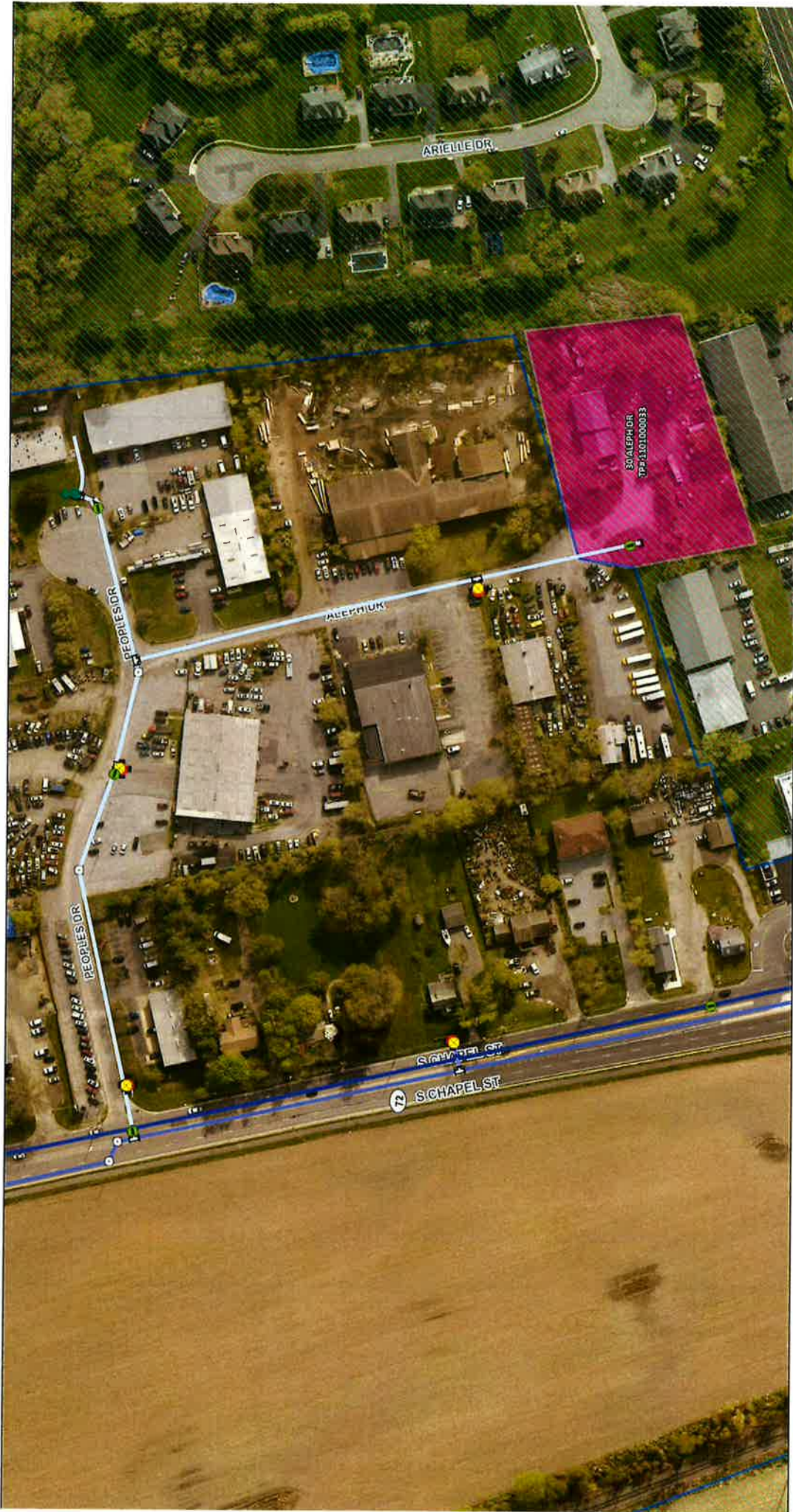
Brookhill Drive

- LEGEND**
- Suez CPCN
 - City Served Parcels in Suez CPCN
 - Control Valve
 - Blowoff
 - System Valve
 - Open
 - Hydrant
 - In-Service
 - Other System Valve
 - Hydrant Isolation Valve
 - Cap
 - Reducer
 - Water Main (Diameter, Owner)
 - Under 4", City of Newark
 - 6", City of Newark
 - 8", City of Newark
 - Water Lateral
 - Fitting
 - Bend
 - Tee

CITY OF NEWARK
DELAWARE

CON Water
Served Parcels in
Suez CPCN

October 2021

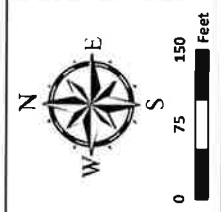


CITY OF NEWARK
DELAWARE

CON Water
Served Parcels in
Suez CPCN
October 2021

Aleph Drive

- LEGEND**
- Suez CPCN
 - City Served Parcels in Suez CPCN
 - Control Valve
 - Blowoff
 - System Valve
 - Open
 - Other System Valve Fitting
 - Hydrant Isolation Valve
 - Hydrant
 - In Service
 - 6", City of Newark
 - 8", City of Newark
 - 12", City of Newark
 - All Sizes, Private or Unknown
 - Bend
 - Tee
 - Cap
 - Reducer
 - Water Main (Diameter, Owner)
 - Under 4", City of Newark



Area	Count	Address	Parcel Number	Lot Size	Property Class
Ogletown Road	1	1100 OGLETOWN RD	901500001	0.26	COMMERCIAL
	2	1104 OGLETOWN RD	901500002	0.37	COMMERCIAL
	3	1108 OGLETOWN RD	901500003	0.39	COMMERCIAL
Ogletown & Marrows Roads	4	1364 MARROWS RD	1802100215	4.24	COMMERCIAL
South College Avenue	5	100 STATION WAY	1803200254	0.6	EXEMPT COMMERCIAL
	6	225 INSPIRATION BLVD	1803600002	27.1	EXEMPT COMMERCIAL
East Chestnut Hill Road	7	0 STATION WAY	1803600003	3.57	EXEMPT COMMERCIAL
	8	139 E CHESTNUT HILL RD	1804400200	0.83	COMMERCIAL
Yorkshire Woods	9	4 EDJIL DR	1100540009	0.32	RESIDENTIAL
	10	6 EDJIL DR	1100540010	0.28	RESIDENTIAL
	11	7 EDJIL DR	1100540005	0.18	RESIDENTIAL
	12	8 EDJIL DR	1100540011	0.18	RESIDENTIAL
	13	9 EDJIL DR	1100540006	0.2	RESIDENTIAL
	14	10 EDJIL DR	1100540012	0.18	RESIDENTIAL
	15	11 EDJIL DR	1100540007	0.23	RESIDENTIAL
	16	12 EDJIL DR	1100540013	0.18	RESIDENTIAL
	17	13 EDJIL DR	1100540008	0.23	RESIDENTIAL
	18	14 EDJIL DR	1100540014	0.21	RESIDENTIAL
	19	100 EDJIL DR	1100540176	0.28	RESIDENTIAL
	20	101 EDJIL DR	1100540187	0.19	RESIDENTIAL
	21	102 EDJIL DR	1100540177	0.18	RESIDENTIAL
	22	103 EDJIL DR	1100540188	0.2	RESIDENTIAL
	23	104 EDJIL DR	1100540178	0.18	RESIDENTIAL
	24	105 EDJIL DR	1100540189	0.22	RESIDENTIAL
	25	106 EDJIL DR	1100540179	0.18	RESIDENTIAL
	26	108 EDJIL DR	1100540180	0.18	RESIDENTIAL
	27	109 EDJIL DR	1100540194	0.18	RESIDENTIAL
	28	110 EDJIL DR	1100540181	0.18	RESIDENTIAL

Area	Count	Address	Parcel Number	Lot Size	Property Class
	29	111 EDJIL DR	1100540195	0.2	RESIDENTIAL
	30	112 EDJIL DR	1100540182	0.18	RESIDENTIAL
	31	113 EDJIL DR	1100540196	0.2	RESIDENTIAL
	32	114 EDJIL DR	1100540183	0.18	RESIDENTIAL
	33	200 EDJIL DR	1100540184	0.18	RESIDENTIAL
	34	202 EDJIL DR	1100540204	0.18	RESIDENTIAL
	35	203 EDJIL DR	1100540200	0.18	RESIDENTIAL
	36	1103 JANICE DR	1100540186	0.2	RESIDENTIAL
	37	1105 JANICE DR	1100540185	0.18	RESIDENTIAL
	38	1107 JANICE DR	1100920001	0.18	RESIDENTIAL
	39	1109 JANICE DR	1100920002	0.18	RESIDENTIAL
	40	1201 JANICE DR	1100920011	0.21	RESIDENTIAL
	41	3 KAREN CIR	1100540193	0.22	RESIDENTIAL
	42	4 KAREN CIR	1100540190	0.18	RESIDENTIAL
	43	6 KAREN CIR	1100540191	0.28	RESIDENTIAL
	44	5 KAREN CIR	1100540192	0.22	RESIDENTIAL
	45	3 KITTY LN	1100540201	0.22	RESIDENTIAL
	46	4 KITTY LN	1100540197	0.2	RESIDENTIAL
	47	5 KITTY LN	1100540202	0.24	RESIDENTIAL
	48	6 KITTY LN	1100540198	0.21	RESIDENTIAL
	49	7 KITTY LN	1100540203	0.36	RESIDENTIAL
	50	9 KITTY LN	1100920007	0.2	RESIDENTIAL
	51	10 KITTY LN	1100540199	0.18	RESIDENTIAL
	52	11 KITTY LN	1100920008	0.2	RESIDENTIAL
	53	12 KITTY LN	1100920006	0.18	RESIDENTIAL
	54	13 KITTY LN	1100920009	0.21	RESIDENTIAL
	55	14 KITTY LN	1100920005	0.18	RESIDENTIAL
	56	15 KITTY LN	1100920010	0.22	RESIDENTIAL
	57	16 KITTY LN	1100920004	0.21	RESIDENTIAL
	58	18 KITTY LN	1100920003	0.2	RESIDENTIAL
South Chapel Street					
	59	15 BLUE HEN DR	1100630314	4.89	COMMERCIAL
	60	21 BLUE HEN DR	1100630310	1.18	INDUSTRIAL

Area	Count	Address	Parcel Number	Lot Size	Property Class
	61	30 BLUE HEN DR	1100630311	0.81	INDUSTRIAL
	62	31 BLUE HEN DR	1100630309	0.79	INDUSTRIAL
	63	41 BLUE HEN DR	1100630308	0.75	INDUSTRIAL
	64	50 BLUE HEN DR	1100630312	0.61	INDUSTRIAL
	65	51 BLUE HEN DR	1100630307	0.61	INDUSTRIAL
	66	60 BLUE HEN DR	1100630313	0.91	INDUSTRIAL
	67	61 BLUE HEN DR	1100630306	0.62	INDUSTRIAL
	68	75 BLUE HEN DR	1100630303	0.84	INDUSTRIAL
	69	85 BLUE HEN DR	1100630305	0.62	INDUSTRIAL
	70	90 BLUE HEN DR	1100630301	0.84	COMMERCIAL
	71	91 BLUE HEN DR	1100630304	0.55	INDUSTRIAL
	72	929 S CHAPEL ST	1100630179	4.85	COMMERCIAL
	73	931 S CHAPEL ST	1100630180	1.52	COMMERCIAL
	74	945 S CHAPEL ST	1100630181	3.78	INDUSTRIAL
	75	955 S CHAPEL ST	1100630302	0.99	INDUSTRIAL
South Well Field					
	76	912 S CHAPEL ST	1100630182	7.35	EXEMPT COMMERCIAL
Brookhill Drive					
	77	22 BROOKHILL DR	1101000020	2	COMMERCIAL
	78	24 BROOKHILL DR	1101000064	1	COMMERCIAL
	79	24 BROOKHILL DR	1101000065	1	COMMERCIAL
	80	30 BROOKHILL DR	1101000019	0.92	COMMERCIAL
	81	32 BROOKHILL DR	1101000017	2	INDUSTRIAL
	82	36 BROOKHILL DR	1101000016	1.02	INDUSTRIAL
	83	38 BROOKHILL DR	1101000015	1.04	INDUSTRIAL
	84	40 BROOKHILL DR	1101000014	1.05	INDUSTRIAL
	85	0 BROOKHILL DR	1101000091	0.06	EXEMPT COMMERCIAL
Aleph Drive					
	86	30 ALEPH DR	1101000033	1.71	INDUSTRIAL

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE JOINT PETITION)
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THE CITY OF NEWARK PURSUANT TO 26)
DEL. C. §215, TO TRANSFER VEOLIA WATER)
DELAWARE, INC.'S RIGHTS UNDER ITS)
CERTIFICATE OF PUBLIC CONVENIENCE AND) PSC DOCKET NO. 23 -
NECESSITY TO THE CITY OF NEWARK TO)
PROVIDE WATER SERVICE TO CERTAIN)
PROPERTIES)
(Filed August 31, 2023))

VERIFICATION

STATE OF DELAWARE)
COUNTY OF NEW CASTLE)

I, Larry Finnicum, being duly sworn, deposes and says under oath:

1. I am authorized as Vice President/General of Veolia Water Delaware, Inc. Manager
("Veolia") to provide this verification on behalf of Veolia in connection with the above-
captioned action.

2. I have read the Joint Petition to Transfer Veolia Water Delaware, Inc.'s rights
under its Certificate of Public Convenience and Necessity to the City of Newark to provide water
service to certain properties, and I know the contents of such Joint Petition. The facts contained
in the Joint Petition are true and correct to the best of my knowledge, information, and belief.

VEOLIA WATER DELAWARE, INC

By: 

SWORN TO AND SUBSCRIBED before
Me this 14th day of August, 2023.

Teresa A Blum
Notary Public

Printed name: Teresa A Blum
My Commission Expires: 12/31/25



**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE JOINT PETITION)
OF VEOLIA WATER DELAWARE, INC. AND)
THE CITY OF NEWARK PURSUANT TO 26)
DEL. C. §215, TO TRANSFER VEOLIA WATER)
DELAWARE, INC'S RIGHTS UNDER ITS)
CERTIFICATE OF PUBLIC CONVENIENCE AND) PSC DOCKET NO. 23 -
NECESSITY TO THE CITY OF NEWARK TO)
PROVIDE WATER SERVICE TO CERTAIN)
PROPERTIES)
(Filed August 31, 2023))



VERIFICATION

STATE OF DELAWARE)
COUNTY OF NEW CASTLE)

I, Thomas Coleman, being duly sworn, deposes and says under oath:

1. I am authorized as the City Manager of the City of Newark ("Newark") to provide this verification on behalf of Newark in connection with the above-captioned action.
2. I have read the Joint Petition to Transfer Veolia Water Delaware, Inc.'s rights under its Certificate of Public Convenience and Necessity to the City of Newark to provide water service to certain properties, and I know the contents of such Joint Petition. The facts contained in the Joint Petition are true and correct to the best of my knowledge, information, and belief.

CITY OF NEWARK



City Manager

SWORN TO AND SUBSCRIBED before
Me this 17th day of August, 2023.

[Signature]
Notary Public

Printed name: Jordan L. Herring
My Commission Expires: 06/28/2025



**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF DELAWARE**

IN THE MATTER OF THE JOINT PETITION)
OF VEOLIA WATER DELAWARE, INC. AND)
THE CITY OF NEWARK PURSUANT TO 26)
DEL. C. §215, TO TRANSFER VEOLIA WATER)
DELAWARE, INC'S RIGHTS UNDER ITS)
CERTIFICATE OF PUBLIC CONVENIENCE AND) PSC DOCKET NO. 23 -
NECESSITY TO THE CITY OF NEWARK TO)
PROVIDE WATER SERVICE TO CERTAIN)
PROPERTIES)
(Filed August 31, 2023))

CERTIFICATE OF SERVICE

I, Pamela J. Scott, hereby certify that on August 31, 2023, I caused the attached Joint Petition to be served on the following person by electronic mail and to be filed with the Public Service Commission using Delafile.

Matthew Hartigan	matthew.hartigan@delaware.gov
Malika Davis	malika.davis@delaware.gov
Ruth A. Price	ruth.price@delaware.gov
Regina Iorii	regina.iorii@delaware.gov
Sommer Poppe	sommer.poppe@delaware.gov
Lisa Driggins	lisa.driggins@delaware.gov



Dated: August 31, 2023