COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560

FAX (717) 783-7152 consumer@paoca.org

March 3, 2016

Thomas T. Niesen, Esquire Thomas, Long, Niesen & Kennard 212 Locust Street, Suite 500 P.O. Box 9500 Harrisburg, PA 17108-9500

Re:

Petition of Delaware Sewer Company an Investigation into Whether the Public Utility Commission Should Order a Capable Public Utility to Acquire Delaware Sewer Company Docket No. I-2016-2526085

Dear Mr. Niesen:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set I, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Ashley Everette
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101
AEverette@paoca.org

Thomas T. Niesen March 3, 2016 Page 2

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,

Lauren Burge

Assistant Consumer Advocate PA Attorney I.D. 311570 E-Mail: LBurge@paoca.org

James M. By

Enclosures

cc: PUC Secretary Chiavetta, (letter and Certificate of Service only)

Certificate of Service

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CERTIFICATE OF SERVICE

Re: Petition of Delaware Sewer Company an Investigation Into Whether the Public Utility Commission Should Order a Capable Public Utility to Acquire Delaware Sewer Company Docket No. I-2016-2526085

I hereby certify that I have this day served a true copy of the foregoing document, Interrogatories of the Office of Consumer Advocate, Set I, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 3rd day of March, 2016.

SERVICE BY E-MAIL AND INTER-OFFICE MAIL

Scott B. Granger, Esquire Allison C. Kaster, Esquire Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission 400 North Street Harrisburg, PA 17120

SERVICE BY EMAIL AND FIRST CLASS MAIL, POSTAGE PREPAID

Thomas T. Niesen, Esquire Thomas, Long, Niesen & Kennard 212 Locust Street, Suite 500 P.O. Box 9500 Harrisburg, PA 17108-9500 Counsel for Delaware Sewer Company

David P. Zambito, Esquire
D. Troy Sellars, Esquire
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101

Christine Maloni Hoover

Ham M. B

Senior Assistant Consumer Advocate

PA Attorney I.D. #50026 Email: <u>CHoover@paoca.org</u>

Erin L. Gannon Senior Assistant Consumer Advocate PA Attorney I.D. #83487

Email: EGannon@paoca.org

Susan Simms Marsh, Esquire Pennsylvania-American Water Company 800 West Hershey Park Drive P.O. Box 888 Hershey, PA 17033

Lauren M. Burge

Assistant Consumer Advocate PA Attorney I.D. # 311570 Email: LBurge@paoca.org

Counsel for Office of Consumer Advocate 555 Walnut Street, 5th Floor, Forum Place Harrisburg, PA 17101-1923

Phone: (717) 783-5048 Fax: (717) 783-7152

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