

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
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800-684-6560

FAX (717) 783-7152  
[consumer@paoca.org](mailto:consumer@paoca.org)

July 24, 2017

Sean M. Cooper, Esquire  
Cooper Law, PLLC  
P.O. Box 312  
Elizabethtown, PA 17022

Re: Pa. Public Utility Commission Bureau of  
Investigation and Enforcement  
v.  
Metropolitan Edison Company and North  
Heidelberg Sewer Company  
Docket No. P-2017-2594688

Dear Mr. Cooper:

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 and Administrative Law Judge Barnes' Third Prehearing Order, we request that the Company provide verified answers to these inquiries by 4:30 PM on July 28, 2017. 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 E. Everette  
Regulatory Analyst  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[aeverette@paoca.org](mailto:aeverette@paoca.org)

North Heidelberg Sewer Company  
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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).

Very truly yours,

/s/Christine Maloni Hoover

Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. #50026

Enclosures

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

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CERTIFICATE OF SERVICE

Re: Pa. Public Utility Commission,  
Bureau of Investigation and Enforcement  
v.  
North Heidelberg Sewer Company  
Docket No. P-2017-2594688

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Set I Interrogatories to North Heidelberg Sewer Company, 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 24th day of July, 2017.

SERVICE BY E-MAIL AND INTER-OFFICE MAIL

Michael L. Swindler  
Bureau of Investigation & Enforcement  
400 North Street  
Harrisburg PA 17120

SERVICE BY EMAIL AND FIRST CLASS MAIL, POSTAGE PREPAID

Tori L. Giesler  
FirstEnergy  
2800 Pottsville Pike  
P.O. Box 16001  
Reading PA 19612-6001

Thomas T. Niesen  
Thomas, Niesen & Thomas  
212 Locust Street, Suite 600  
Harrisburg, PA 17101

Elizabeth Shuman  
DEP South Central Regional Office  
909 Elmerton Avenue  
Harrisburg PA 17110

/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. #50026  
Email: CHoover@paoca.org

Counsel for  
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