### **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

January 16, 2018

Thomas T. Niesen, Esquire Thomas, Niesen & Thomas, LLC 212 Locust Street Suite 302 Harrisburg, PA 17101

Re:

Investigation of Delaware Sewer Company

Pursuant to Section 529 of the Public Utility

Code

Docket No. I-2016-2526085

Dear Mr. Niesen:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set III, 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 E. Everette
Office of Consumer Advocate
Forum Place, 5<sup>th</sup> Floor
555 Walnut Street
Harrisburg, PA 17101
AEverette@paoca.org

Thomas T. Niesen January 16, 2018 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

Jan M. Br

Assistant Consumer Advocate PA Attorney I.D. 311570

E-Mail: LBurge@paoca.org

Enclosures

cc:

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

Certificate of Service

\*243108

#### CERTIFICATE OF SERVICE

Re:

Investigation of Delaware Sewer Company Pursuant to

Section 529 of the Public Utility Code

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 III, 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 16<sup>th</sup> day of January, 2018.

## 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, Niesen & Thomas, LLC 212 Locust Street Suite 302 Harrisburg, PA 17101 Counsel for Delaware Sewer Company

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

David P. Zambito, Esquire George A. Bibikos, Esquire Cozen O'Connor 17 North Second Street, Suite 1410 Harrisburg, PA 17101 Alexander R. Stahl Aqua Services, Inc. Regulatory Counsel 762 W. Lancaster Ave. Bryn Mawr, PA 19010

\s\ Lauren M. Burge
Lauren M. Burge
Assistant Consumer Advocate
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Christine Maloni Hoover Senior Assistant Consumer Advocate PA Attorney I.D. # 50026 Email: <u>CHoover@poaca.org</u>

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