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 29, 2019

Kimberly Joyce, Esquire Alexander R. Stahl, Esquire Aqua America, Inc. 762 West Lancaster Avenue Bryn Mawr, PA 19010

Re: Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for all of the Authority and the Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC and Peoples Gas Company LLC by Way of the Purchase of All of LDC Funding LLC's Membership Interests by Aqua America, Inc.

Docket No. A-2018-3006061 Docket No. A-2018-3006062 Docket No. A-2018-3006063

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set XI (HIGHLY CONFIDENTIAL VERSION), in the above-referenced proceeding. The enclosed Highly Confidential Set XI Interrogatories will be provided in hard copies to those parties that have signed the Protective Agreement.

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:

Ralph Smith Larkin & Associates 15728 Farmington Road Livonia, MI 48154 rsmithla@aol.com Kimberly Joyce, Esq. Alexander R. Stahl, Esq. March 29, 2019 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,

J.D. Moore

Assistant Consumer Advocate

PA Attorney I.D. # 326292 E-Mail: <u>JMoore@paoca.org</u>

Enclosures:

cc.

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

Certificate of Service

*269044

CERTIFICATE OF SERVICE

Re: Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania
Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for all of the Authority and the Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC and Peoples Gas Company LLC by Way of the Purchase of All of LDC Funding LLC's Membership Interests by Aqua America, Inc.

Docket No. A-2018-3006061 Docket No. A-2018-3006062 Docket No. A-2018-3006063

I hereby certify that I have this day served a true copy of the following documents, the Office of Consumer Advocate's Interrogatories to Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC, Set XI (HIGHLY CONFIDENTIAL VERSION), 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 29th day of March 2019.

*Receiving Highly Confidential Interrogatories, Set XI

SERVICE BY INTER-OFFICE MAIL

*Erika L. McLain, Esquire
*Carrie B. Wright, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
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Counsel for I&E

SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

*Erin K. Fure, Esquire Office of Small Business Advocate Commerce Building 300 North Second Street, Suite 202, Harrisburg, PA 17101 Counsel for OSBA

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*Todd S. Stewart, Esquire Hawke, McKeon & Sniscak, LLP 100 North Tenth Street Harrisburg, PA 17101 Counsel for Natural Gas Suppliers Parties and The Retail Energy Supply Association

*Melvin L. Vatz, Esquire 247 Fort Pitt Boulevard, 4th Floor Pittsburgh, PA 15222 Counsel for Laborers' District Council of Western Pennsylvania

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*Linda R. Evers, Esquire Stevens & Lee 111 North Sixth Street Reading, PA 19601 Counsel for Duquesne Light Company

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*Michael W. Hassell, Esquire *Michael W. Gang, Esquire *Garrett P. Lent, Esquire Post & Schell, P.C. 17 North Second Street, 12th Floor Harrisburg, PA 17101 Counsel for Aqua America, Inc. /s/ J.D. Moore J.D. Moore Assistant Consumer Advocate PA Attorney I.D. # 326292 Email: JMoore@paoca.org

Darryl A. Lawrence Senior Assistant Consumer Advocate PA Attorney I.D. # 93682 Email: <u>DLawrence@paoca.org</u>

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Phone: (717) 783-5048
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Dated: March 29, 2019

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