

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

July 30, 2019

John J. Gallagher, Esquire  
City of Lancaster  
711 Forrest Road  
Harrisburg, PA 17112

Re: Pennsylvania Public Utility Commission  
v.  
City of Lancaster – Sewer Fund  
Docket No. R-2019-3010955

Dear Mr. Gallagher:

Enclosed you will find two copies of the 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 twenty (20) 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  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17101  
[AEverette@paoca.org](mailto:AEverette@paoca.org)

John J. Gallagher, Esquire  
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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,



Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
E-Mail: [HBreitman@paoca.org](mailto:HBreitman@paoca.org)

Enclosures:

cc: PUC Secretary Chiavetta, (Letter and Certificate of Service only)  
Certificate of Service  
\*276763

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility :  
Commission : Docket No. R-2019-3010955  
v. :  
City of Lancaster – Sewer Fund :

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

Dated this 30<sup>th</sup> day of July 2019.

SERVICE BY E-MAIL and INTEROFFICE MAIL

Richard A. Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL, POSTAGE PREPAID

John R. Evans  
Office of Small Business Advocate  
300 North Second Street  
Suite 202  
Harrisburg, PA 17101

John J. Gallagher, Esquire  
City of Lancaster  
711 Forrest Road  
Harrisburg, PA 17112

/s/ Harrison W. Breitman  
Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
E-Mail: [HBreitman@paoca.org](mailto:HBreitman@paoca.org)

Phillip D. Demanchick  
Assistant Consumer Advocate  
PA Attorney I.D. # 324761  
E-Mail: [PDemanchick@paoca.org](mailto:PDemanchick@paoca.org)

Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026  
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\*276764

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: July 30, 2019