

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 17, 2019

Thomas Wyatt, Esquire  
Matthew S. Olesh, Esquire  
Obermayer Rebmann Maxwell & Hippel, LLP  
Centre Square West  
1500 Market Street  
Suite 3400  
Philadelphia, PA 19102

Re: Application of Aqua Pennsylvania  
Wastewater, Inc. Pursuant to Sections  
1102, 1329 and 507 of the Public Utility  
Code for Approval of its Acquisition of  
Wastewater System Assets of East Norriton  
Township  
Docket No. A-2019-3009052

Dear Counsel:

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

In accordance with the Commission's Rules of Practice and Procedure, as modified by the Prehearing Conference Order issued on December 4, 2019, we request that the Respondent provide verified answers to these inquiries within five (5) calendar days of service. 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:

David Garrett, President  
Resolve Utility Consulting, PLLC  
101 Park Avenue  
Suite 1125  
Oklahoma City, OK 73120  
E-Mail: [dgarrett@resolveuc.com](mailto:dgarrett@resolveuc.com)

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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).

Respectfully submitted,

/s/ Harrison W. Breitman  
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

\*281941

CERTIFICATE OF SERVICE

Re: Application of Aqua Pennsylvania :  
Wastewater, Inc. Pursuant to Sections 1102, :  
1329 and 507 of the Public Utility Code for : Docket No. A-2019-3009052  
Approval of its Acquisition of Wastewater :  
System Assets of East Norriton Township :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to East Norriton Township, Set VI, 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 17<sup>th</sup> day of December 2019.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

Gina L. Miller, Esquire  
Erika L. McLain, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Erin K. Fure, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

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

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Alexander R. Stahl, Esquire  
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Michael and Christine Maddalo  
30 Point of Woods  
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Allen R. Dalton  
2580 Terrace Drive  
East Norriton, PA 19402

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Dated: December 17, 2019  
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