


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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FAX (717) 783-7152  
consumer@paoca.org

May 5, 2020

**Via Electronic Mail Only**

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

Re: Application of Aqua Pennsylvania Wastewater Inc.  
pursuant to Sections 507, 1102 and 1329 of the Public  
Utility Code for Approval of its Acquisition of the  
Wastewater System Assets of the Delaware County  
Regional Water Quality Control Authority  
Docket No. A-2019-3015173

Dear Mr. Niesen:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set II, 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. The OCA would appreciate your efforts to meet the modified discovery response deadlines that have been used in prior Applications filed pursuant to Sections 1102 and 1329 of the Public Utility Code. 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 C. Smith  
Larkin & Associates, PLLC  
15728 Farmington Road  
Livonia, MI 48154  
E-Mail: [OCADelcora@paoca.org](mailto:OCADelcora@paoca.org)

Thomas T. Niesen, 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).

Respectfully submitted,

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

Enclosures:

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

\*285689

CERTIFICATE OF SERVICE

Re: Application of Aqua Pennsylvania Wastewater :  
Inc. pursuant to Sections 507, 1102 and 1329 :  
of the Public Utility Code for Approval of its : Docket No. A-2019-3015173  
Acquisition of the Wastewater System Assets :  
of the Delaware County Regional Water Quality :  
Control Authority :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Aqua Pennsylvania Wastewater, Inc., Set II, 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 5<sup>th</sup> day of May 2020.

**SERVICE BY E-MAIL ONLY**

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  
Daniel G. Asmus, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
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Harrisburg, PA 17101-1923

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Harrisburg, PA 17101

Alexander R. Stahl, Esquire  
Kimberly A. Joyce, Esquire  
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Bryn Mawr, PA 19010

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

/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
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Santo G. Spataro  
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Counsel for:  
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Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: May 5, 2020  
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