



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

July 29, 2020

Via Electronic Mail

Thomas T. Niesen, Esq.
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
I&E Interrogatories

Dear Attorney Niesen:

Enclosed please find a copy of the Bureau of Investigation and Enforcement's (I&E) **Interrogatories Set I (nos 1-7) - Gilliland**. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

Although pursuant to Pa. Code Section 5.342(d), responses to these Interrogatories are due within 20 days of service, please note that either through the agreement of parties, or by motion, I&E will be seeking to shorten this response period to five (5) days in the near future. I&E's response period proposal is appropriate for this proceeding and the Commission encourages these rule modifications to prevent delay.¹ Accordingly, and in consideration of the abbreviated timeframe for this proceeding, I&E requests that Aqua Pennsylvania Wastewater, Inc. provide its responses within five (5) days. Please forward your responses via email to ermclain@pa.gov and ginmiller@pa.gov.

Copies are being served on parties of record per the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic Service.* Should you have any questions, please do not hesitate to contact me.

Sincerely,

Erika L. McLain
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 320526

ELM/ac
Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter and Certificate of Service only – via e-file*)
Per Certificate of Service

¹ Final Supplemental Implementation Order, Docket No. M-2016-2543193 (Order entered Feb. 28, 2019), p. 51.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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 :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatories** dated July 29, 2020,
in the manner and upon the persons listed below.

Served via Electronic Mail Only

Thomas T. Niesen, Esq.
Thomas, Niesen & Thomas, LLC
212 Locust Street, Suite 302
Harrisburg, PA 17101
tniesen@tntlawfirm.com
Counsel for
Aqua Pennsylvania Wastewater, Inc.

Alexander R. Stahl, Esq.
Aqua Pennsylvania, Inc.
762 West Lancaster Avenue
Bryn Mawr, PA 19010
astahl@aquaamerica.com

Thomas Wyatt, Esq.
Matthew S. Olesh, Esq.
Obermayer Rebmann Maxwell & Hippel LLP
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19102
thomas.wyatt@obermayer.com
matthew.olesh@obermayer.com
Counsel for DELCORA

Kenneth D. Kynett, Esq.
Charles G. Miller, Esq.
Petrikin, Wellman, Damico, Brown & Petrosa
William Penn Building
109 Chesley Drive
Media, PA 19063
kdk@petrikin.com
egm@petrikin.com
Counsel for Edgmont Township, Delaware
County

Adeolu A. Bakare, Esq.
Robert F. Young, Esq.
Kenneth R. Stark, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
abakare@mcneeslaw.com
ryoung@mcneeslaw.com
kstark@mcneeslaw.com
Counsel for Delaware County

Scott J. Rubin, Esq.
333 Oak Lane
Bloomsburg, PA 17815-2036
scott.j.rubin@gmail.com
*Counsel for Southwest Delaware County
Municipal Authority*

Erin K. Fure, Esq.
Daniel G. Asmus, Esq.
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
efure@pa.gov
dasmus@pa.gov

Christine Maloni Hoover, Esq.
Erin L. Gannon, Esq.
Harrison W. Breitman, Esq.
Santo G. Spataro, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
choover@paoca.org
egannon@paoca.org
hbreitman@paoca.org
sspataro@paoca.org



Erika L. McLain
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 320526