

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

BUREAU OF INVESTIGATION & ENFORCEMENT

October 18, 2022

Via Electronic Mail

John F. Povilaitis, Esq.
Alan M. Seltzer, Esq.
Buchanan Ingersol & Rooney, PC
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357
john.povilaitis@bipc.com
alan.seltzer@bipc.com

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 – Set III**

Dear Counsel:

Enclosed please the Bureau of Investigation and Enforcement's (I&E) Interrogatories Set III (nos. 1-4) – Gumby in the above-captioned proceeding. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

In accordance with the discovery modifications approved and memorialized in the Prehearing Conference Order, which was issued in this case on August 3, 2020, answers to these interrogatories are due within five (5) calendar days of service. Please provide your responses via email to ginmiller@pa.gov and ermclain@pa.gov.

Consistent with the Pennsylvania Public Utility Commission's order regarding waiver of regulations regarding service requirements, issued at docket M-2021-3028321 on September 15, 2021, I&E is providing only electronic service on parties of record per

-

¹ It is I&E's understanding that the above-referenced time period prescribed in the Prehearing Order has not been altered as it relates to these interrogatories.

the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Respectfully,

Gina L. Miller Prosecutor

Bureau of Investigation and Enforcement

PA Attorney ID No. 313863 (717) 787-8754

ginmiller@pa.gov

Erika L. McLain Prosecutor Bureau of Investigation and Enforcement PA Attorney ID No. 320526 ermclain@pa.gov

GLM/ELM/jfm Enclosures

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

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** – **Set III** dated October 18, 2022, in the manner and upon the person listed below.

Served via Electronic Mail Only

John F. Povilaitis, Esq Adeolu A. Bakare, Esq. Alan M. Seltzer, Esq. Robert F. Young, Esq. Buchanan Ingersol & Rooney, PC Kenneth R. Stark, Esq.

409 North Second Street, Suite 500 McNees Wallace & Nurick LLC

Harrisburg, PA 17101-1357 100 Pine Street john.povilaitis@bipc.com P.O. Box 1166

alan.seltzer@bipc.comHarrisburg, PA 17108-1166Counsel forabakare@mcneeslaw.comAqua Pennsylvania Wastewater, Inc.ryoung@mcneeslaw.com

kstark@mcneeslaw.com
Counsel for Delaware County

Alexander R. Stahl, Esq.
Samantha L. Newell, Esq.
Aqua Pennsylvania, Inc.
762 West Lancaster Avenue
Michael P. Clarke, Esq.
Bryn Mawr, PA 19010
Rudolph Clarke, LLC
astahl@aquaamerica.com

Seven Neshaminy Interplex, Suite 200

Trevose, PA 19053

<u>snewell@rudolphclarke.com</u> Christine Maloni Hoover, Esq. pseymour@rudolphclarke.com Erin L. Gannon, Esq.

<u>mclarke@rudolphclarke.com</u> Harrison W. Breitman, Esq.Office of Counsel for DELCORA Consumer Advocate

Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101
OCADelcora@paoca.org

Steven C. Gray, Esq.
Office of Small Business Advocate
555 Walnut Street
1st Floor
Harrisburg, PA 17101
sgray@pa.gov

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
cgm@petrikin.com
Counsel for
Edgmont Township, Delaware County

Thomas J. Sniscak, Esq.
Kevin J. McKeon, Esq.
Whitney E. Snyder, Esq.
Melissa A. Chapaska, Esq.
Phillip D. Demanchick, Esq.
Hawke McKeon & Sniscak LLP
100 North Tenth Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
kjmckeon@hmslegal.com
wesnyder@hmslegal.com
machapaska@hmslegal.com
pddemanchick@hmslegal.com
Counsel for Sunoco Partners Marketing &
Terminals, L.P./ Energy Transfer

Justin G. Weber, Esq.
Troutman Pepper Hamilton Sanders LLP
100 Market Street, Ste 200
P.O. Box 1181
Harrisburg, PA 17108-1181
justin.weber@troutman.com
Counsel for Kimberly-Clark Corp. &
Kimberly-Clark Pennsylvania, LLC

Jason T. Ketelsen, Esq.
Troutman Pepper Hamilton Sanders LLP
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103
jason.ketelsen@troutman.com
Counsel for Kimberly-Clark Corp. &
Kimberly-Clark Pennsylvania, LLC

Marc D. Machlin, Esq.
Troutman Pepper Hamilton Sanders LLP
2000 K Street, NW, Suite 600
Washington DC 20006
marc.machlin@troutman.com
Counsel for Kimberly-Clark Corp. &
Kimberly-Clark Pennsylvania, LLC

Robert W. Scott, Esq.
Robert W. Scott PC
205 North Monroe Street
P.O. Box 468
Media, PA 19063
rscott@robertwscottpc.com
Counsel for Borough of Ambler

Joseph L. Vullo, Esq.
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
Counsel for Southwest Delaware County
Municipal Authority, Edgmont Twp.,
Lower Chichester Twp. & Upland Boro

Brian Kalcic
Excel Consulting
225 S. Meramec Ave.
Suite 720T
St. Louis, MO 63105
excel.consulting@sbcglobal.net
Consultant for OSBA

John McLaughlin, Esq.
Tiffany R. Allen, Esq.
Benjamin Patchen, Esq.
Campbell Durrant, P.C.
One Belmont Avenue, Suite 300
Bala Cynwyd, PA 19004
jmclaughlin@cdblaw.com
tallen@cdblaw.com
bpatchen@cdblaw.com
Counsel for
Receiver for the City of Chester

Ralph C. Smith
Larkin & Associates, PLLC
15728 Farmington Road
Livonia, MI 48154
OCADelcora@paoca.org
Consultant for OCA

Cynthia Pantages C&L Rental Properties, LLC 30 S. Lake Drive P.O. Box 516 Lake Harmony, PA 18624 cyndipantages@gmail.com

Ross Schmucki 218 Rutgers Avenue Swarthmore, PA 19081 rschmucki@gmail.com Edward Clark, Jr.
Treasure Lake Property Owners Association
13 Treasure Lake
Dubois, PA 15801
gm@treasurelake.us

Patricia Kozel 15 Hazzard Run Road Lake Harmony, PA 18624 pattyk6@icloud.com Complainant

Lawrence and Susan Potts 11 Chestnut Street P.O. Box 522 Lake Harmony, PA 18624 susie01213@aol.com Complainants

Peter Ginoplus P.O. Box 197 Lake Harmony, PA 18624 pete@kiddertax.com

Gina L. Miller Prosecutor

Bureau of Investigation and Enforcement PA Attorney ID No. 313863