

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

June 16, 2015

James Kettler, President
Hidden Valley Utility Services
811 Russell Avenue, Suite F
Gaithersburg, MD 20879

Re: Pa. Public Utility Commission
v.
Hidden Valley Utility Services, L.P. - Water
Docket No. C-2014-2447138

Dear Mr. Kettler:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set V, 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.

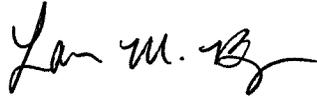
We also request that you send a copy of the answers directly to our consultant, as listed below:

Ashley Everette
Office of Consumer Advocate
Forum Place, 5th Floor
555 Walnut Street
Harrisburg, PA 17101
AEverette@paoca.org

Mr. James Kettler
June 16, 2015
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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).

Sincerely,



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

Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
E-Mail: EGannon@paoca.org

Lauren M. Burge
Assistant Consumer Advocate
PA Attorney I.D. #311570
E-Mail: LBurge@paoca.org

Enclosures

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

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CERTIFICATE OF SERVICE

Tanya J. McCloskey, Acting Consumer Advocate

v.

Hidden Valley Utility Services, L.P. - Water

Docket No. C-2014-2447138

I hereby certify that I have this day served a true copy of the foregoing document, Interrogatories of the Office of Consumer Advocate, Set V, 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 16th day of June 2015.

SERVICE BY E-MAIL ONLY

Edward G. Lanza, Esquire
P.O. Box 61336
Harrisburg, PA 17106-1336

SERVICE BY E-MAIL AND INTER-OFFICE MAIL

Johnnie Simms, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

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

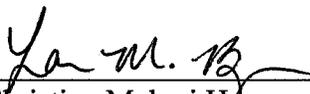
Tori L. Giesler, Esquire
2800 Pottsville Pike
P.O. Box 16001
Reading, PA 19612-6001

Alice Johnston
Obermayer Rebmann
Maxwell & Hippel LLP
BNY Mellon Center, Suite 5240
Pittsburgh, PA 15219

Paige Macdonald-Matthes
Obermayer Rebmann
Maxwell & Hippel LLP
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200 Locust Street
Harrisburg, PA 17101-1508

SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

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Counsel for
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555 Walnut Street, 5th Floor, Forum Place Harrisburg, PA 17101-1923
Phone: (717) 783-5048

208617

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION :
 :
 v. : DOCKET NO. C-2014-2447169
 :
 HIDDEN VALLEY UTILITY SERVICES, L.P. - :
 WASTEWATER :

INTERROGATORIES OF THE
OFFICE OF CONSUMER ADVOCATE
SET V

Pursuant to 52 Pa. Code §5.341, the Office of Consumer Advocate hereby propounds the following Interrogatories to Hidden Valley Utility Services, L.P. - Wastewater to be answered by those officers, employees, agents, or contractors who have knowledge of the requested facts and who are authorized to answer on behalf of the Company. Each interrogatory is to be verified by the responding witness in accordance with 52 Pa. Code §5.342(a)(6).

DATED: June 16, 2015

Instructions

- 1) These interrogatories shall be construed as a continuing request. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as first becomes available to the Respondent after the answers hereto are filed.
- 2) Restate the interrogatory immediately preceding each response.
- 3) Identify the name, title, and business address of each person(s) providing each response.
- 4) Provide the date on which the response was created.
- 5) Divulge all information that is within the knowledge, possession, control, or custody of Respondent or may be reasonably ascertained thereby. The term "Hidden Valley Utility Services, L.P. -Wastewater," "Hidden Valley Utility Services," "Hidden Valley," or "you" as used herein includes Hidden Valley Utility Services, L.P. - Wastewater, its attorneys, agents, employees, contractors, or other representatives, to the extent that the Company has the right to compel the action requested herein.
- 6) Provide a verification by the responsible witness that all facts contained in the response are true and correct to the best of the witness' knowledge, information and belief.
- 7) As used herein but only to the extent not protected by 52 Pa. Code Section 5.323, the word "document" or "workpaper" includes, but is not limited to, the original and all copies in whatever form, stored or contained in or on whatever media or medium including computerized memory, magnetic, electronic, or optical media, regardless of origin and whether or not including additional writing thereon or attached thereto, and may consist of:
 - a) notations of any sort concerning conversations, telephone calls, meetings or other communications;
 - b) bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys;
 - c) worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing.

Office of Consumer Advocate
v.
Hidden Valley Utility Services, L.P. - Water
Docket No. C-2014-2447138

Interrogatories of the Office of Consumer Advocate
Set V

1. See the response to OCA-II-11. The customer bill lists the Company contact number as 814-443-0825. Who is responsible for answering this phone?
2. Does the phone at 814-443-0825 have a voicemail or answering machine?
3. Refer to question 2 above. If yes, does the Company have a procedure by which calls are returned to customers? Please explain.
4. Does the voicemail/answering machine for 814-443-0825 provide the toll-free number which customers can call in an emergency? If yes, when was this added?
5. See question 1 above. In 2013, 2014 and to-date in 2015, was this phone continuously available for customers to call? List any dates in 2013, 2014 and 2015 in which service was turned off for this phone number.
6. Please provide copies of the bills that Hidden Valley received for phone service at 814-443-0825 in 2014 and 2015.
7. Refer to question 3 above. Please provide copies of any non-bill communication from the telephone provider of 814-443-0825 in 2013, 2014 and 2015, including, but not limited to “Notice of Account Past Due” or other late payment notifications.
8. If the phone number 814-443-0825 is unavailable for any reason, is there an alternate number that customers can call? If so, please provide the phone number, the person who answers the phone, and how customers are made aware of this number.
9. See the response to OCA-I-8. How and when are customers informed of the toll-free number to call in emergencies?
10. Refer to the response to OCA-I-8. If a customer reports an emergency on the toll-free number, how is the Company informed of the issue?
11. Refer to the response to OCA-I-8. If a customer calls the call center with a billing issue or other non-emergency service issue, what is the procedure for handling this customer’s call?