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| PUC logo | COMMONWEALTH OF PENNSYLVANIA  PENNSYLVANIA PUBLIC UTILITY COMMISSION  P.O. BOX 3265, HARRISBURG, PA 17105-3265 | **IN REPLY PLEASE REFER TO OUR FILE**  Docket No.  P-2017-2594688 |

**May 26, 2017**

Joseph M. Aichholz III, President

Joseph H. Aichholz Jr., CEO

North Heidelberg Sewer Company

P.O. Box 609

Bernville, PA 19506

Re: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. North Heidelberg Sewer Company

Docket No. P-2017-2594688

Dear Mr. Aichholz:

On May 4, 2017, the Commission issued an Opinion and Order at the above docket whereby it directed the Bureau of Audits (Audits) and the Bureau of Technical Utility Services (TUS) to conduct a review into the continued viability of North Heidelberg Sewer Company (NHSC) “as a going concern and of its ability to provide safe and reliable service at reasonable rates.” Opinion and Order at 20, Ordering Paragraph 10. Accordingly, Audits and TUS propound these Set 1 Data Requests to NHSC.

**NHSC is to provide complete written responses within twenty (20) days of the date of this Secretarial Letter and shall file those responses with the Secretary at Docket No. P-2017-2594688**. NHSC may claim proprietary or confidential protection for sensitive information. However, such a claim does not excuse NHSC from providing timely responses. The Commission will pursue all legal remedies available to it to enforce the Opinion and Order referenced above. 66 Pa. C.S. §§ 501-503. This Letter also serves as written notice to NHSC of its obligation to respond pursuant to Sections 504-506 of the Public Utility Code. Objections must be filed in accordance with 52 Pa. Code § 5.44.

 Sincerely,

# Rosemary Chiavetta

Secretary

cc: Bureau of Technical Utility Services

Bureau of Audits

All parties of record

**INSTRUCTIONS**

Pursuant to the Commission directives in the May 4, 2017, Opinion and Order at the above docket, and in accordance with 66 Pa. C.S. §§ 504-506, the Bureaus of Audits and Technical Utility Services hereby propound the following data requests to the North Heidelberg Sewer Company (NHSC) to be answered in writing 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.

1. These data requests shall be construed as a continuing request. The Respondent is obliged to change, supplement and correct all answers to data requests to conform to available information; including such information as first becomes available to the Respondent after the answers hereto are filed.

2. Restate the data request 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 "North Heidelberg Sewer Company” or "NHSC” or “the Company," or "you," as used herein includes North Heidelberg Sewer Company, Inc., its attorneys, agents, employees, contractors, or other representatives.

6. As used herein 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:

1. notations of any sort concerning conversations, telephone calls, meetings or other communications;
2. bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys;
3. worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing.

7. Documents may be submitted under proprietary or confidential seal, but a claim of confidentiality does not excuse NHSC from providing timely responses.

8. Provide information and responses as completed. Do not wait to provide responses until NHSC completes all responses.

9. Pursuant to 52 Pa. Code § 1.36, persons providing responses to these Data Requests must sign and date a copy of the included Verification.

**INTERROGATORIES**

1. State the physical address for the NHSC main office.
2. State Mr. Joseph Aichholz Jr.’s role and duties relating to NHSC.
3. State Mr. Joseph Aichholz III’s role and duties relating to NHSC.

4. Identify the number of NHSC employees and provide the name and job title for each NHSC Employee.

1. Provide NHSC Federal Corporate Tax Returns for NHSC for the year:

a. 2011;

b. 2012;

c. 2013;

d. 2014;

e. 2015;

f. 2016.

1. Provide bank Statements for all accounts belonging to NHSC for:

a. January 1, 2015 through December 31, 2015;

b. January 1, 2016 through December 31, 2016;

c. January 1, 2017 through April 30, 2017.

1. Provide NHSC Income Statements and Balance Sheets for NHSC for:

a. January 1, 2011 through December 31, 2011;

b. January 1, 2012 through December 31, 2012;

c. January 1, 2013 through December 31, 2013;

d. January 1, 2014 through December 31, 2014;

e. January 1, 2015 through December 31, 2015;

f. January 1, 2016 through December 31, 2016.

1. Provide NHSC General Ledger detail for:

a. January 1, 2015 through December 31, 2015;

b. January 1, 2016 through December 31, 2016;

c. January 1, 2017 through April 30, 2017.

9. Respond “Yes” or “No” to the following questions for each respective year. Did NHSC file a financial Annual Report with the Pennsylvania Public Utility Commission pursuant to 52 Pa. Code §65.19 for the year:

a. 2013;

b. 2014;

c. 2015;

d. 2016.

If NHSC responds “yes” for any year provide a copy of the financial annual report for that year.

1. Respond “Yes” or “No” to the following questions for each respective year. Did NHSC file a Public Utility Security Planning and Readiness Self-Certification form with the Pennsylvania Public Utility Commission pursuant to 52 Pa. Code Chapter 101 for the year:

a. 2013;

b. 2014;

c. 2015;

d. 2016.

If NHSC responds “yes” for any year provide a copy of the Public Utility Security Planning and Readiness Self-Certification form for that year.

1. Detail all assessment payments made by NHSC to the Pennsylvania Public Utility Commission pursuant to 66 Pa. C.S. § 510(b) for the year

a. 2013;

b. 2014;

c. 2015;

d. 2016.

**VERIFICATION**

I, \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, hereby state that the facts set forth in my responses to the above Data Requests are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Title: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_