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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 |

**June 1, 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 2** 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

**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.

**SET 2 DATA REQUESTS**

1. Provide a copy of the NHSC Operations & Maintenance Manual.
2. Identify all DEP certified wastewater operators responsible for operation of NHSC. For each DEP certified wastewater operator identified provide the following:

a. Full name;

b. Business address;

c. DEP Operator Number;

d. DEP Operator license expiration date.

1. Provide a copy of the NHSC Emergency Response Plan.
2. Provide the following NHSC wastewater system characteristics:

a. Miles of main broken out by i) material and, ii) decade of installation;

b. Number of customers;

c. Treatment plant capacity;

d. Description of treatment process;

e. Types of chemicals used in the treatment process.

1. Provide the number of leaks i) identified and, ii) repaired from January 1 through December 31 for each of the following years:

a. 2013;

b. 2014;

c. 2015;

d. 2016.

1. Provide a list of all regularly scheduled maintenance practices performed (i.e. operate valves, pumps, belt presses, etc.) and the frequency of each maintenance practice identified.
2. Provide a list and description of all Permit Limit Exceedances or SSO Occurrences and the remedial steps taken for each in all of the following years:

a. 2012;

b. 2013;

c. 2014;

d. 2015;

e. 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: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_