

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560

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consumer@paoca.org

April 5, 2019

Thomas T. Niesen, Esquire  
Thomas, Niesen & Thomas, LLC  
212 Locust Street  
Suite 302  
Harrisburg, PA 17101

Re: Pa. Public Utility Commission, Bureau of  
Investigation and Enforcement  
v.  
Winola Water Company  
Docket Nos. C-2018-2644592  
P-2018-3006216  
I-2018-3006498

Dear Mr. Niesen:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set III, 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 E. Everette  
Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17101  
[AEverette@paoca.org](mailto:AEverette@paoca.org)

Thomas T. Niesen, Esquire  
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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,



Christy M. Appleby  
Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
E-Mail: [CApplby@paoca.org](mailto:CApplby@paoca.org)

Enclosures:

cc: PUC Secretary Chiavetta, (Letter and Certificate of Service only)  
Certificate of Service  
\*269739

CERTIFICATE OF SERVICE

Re: Pa. Public Utility Commission, :  
Bureau of Investigation and : Docket Nos. C-2018-2644592  
Enforcement : P-2018-3006216  
v. : I-2018-3006498  
: :  
Winola Water Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories, Set III to Aqua Pennsylvania, Inc., 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 5<sup>th</sup> day of April 2019.

SERVICE BY E-MAIL and INTER-OFFICE MAIL

Michael L. Swindler, Esquire  
Bradley R. Gorter, Esquire  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

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

Ralph Scartelli  
Winola Water Company  
742 North Webster Avenue  
Scranton, PA 18510

Frances P. Orth  
Aqua Pennsylvania, Inc.  
762 West Lancaster Avenue  
Bryn Mawr, PA 19010

John R. Evans  
Office of Small Business Advocate  
300 North Second Street  
Suite 202  
Harrisburg, PA 17101

Crystal Mickalowski  
Department of Environmental Protection  
Northeast Regional Office  
2 Public Square  
Wilkes-Barre, PA 18701

Thomas T. Niesen, Esquire  
Thomas, Niesen, & Thomas, LLC  
212 Locust Street  
Suite 302  
Harrisburg, PA 17101

Elizabeth Rose Triscari, Esquire  
Pennsylvania American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055

David P. Zambito, Esquire  
Jonathan P. Nase, Esquire  
Cozen O'Connor  
17 North Second Street  
Suite 1410  
Harrisburg, PA 17101

SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

Overfield Township  
775 Lower Mill City Road  
Dalton, PA 18414

Suez Water Pennsylvania Inc.  
6310 Allentown Boulevard  
Harrisburg, PA 17111

/s/ Christy M. Appleby  
Christy M. Appleby  
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Dated: April 5, 2019  
\*269738