


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

 @pa_oca

 /pennoca

FAX (717) 783-7152
consumer@paoca.org

November 18, 2019

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

Re: Implementation of Act 120 of 2018
Docket No. M-2019-3013286

Dear Secretary Chiavetta:

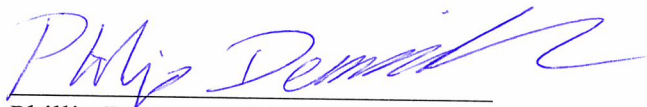
On October 3, 2019, the Pennsylvania Public Utility Commission (Commission) adopted a Joint Motion directing the Bureau of Technical Utility Services and Law Bureau to develop recommendations for additional parameters for programs designed to replace customer-owned lead service lines and damaged wastewater laterals. The Commission issued a Secretarial Letter that was published in the Pennsylvania Bulletin on November 2, 2019, directing all interested parties to provide comments to directed questions attached to the Secretarial Letter by November 22, 2019.

Aqua Pennsylvania, Inc. (Aqua) recently filed a letter with the Commission, requesting an extension to the response period to December 9, 2019. As Aqua noted, the Secretarial Letter directs interested parties to respond to thirty-four questions relating to several different areas of expertise, including operations, engineering, communications, accounting, legal, and rates. Aqua stated that the requested extension will allow the parties to provide a more comprehensive response to the directed questions.

The Office of Consumer Advocate (OCA) supports Aqua's requested extension. The OCA submits that the current deadline does not provide enough time to adequately address these important issues. Furthermore, the additional time will not prevent the interested stakeholders from reviewing the submitted responses and preparing for the Act 120 Working Group workshop on December 19, 2019. Rather, the additional time will allow for more detailed responses, thereby providing the Working Group with a better starting point for discussion.

For the above reasons, the OCA files this letter in support of an extension of time for the responses to the directed questions attached to the Secretarial Letter published in the Pennsylvania Bulletin on November 2, 2019.

Respectfully Submitted,



Phillip D. Demanchick
Assistant Consumer Advocate
PA Attorney I.D. # 324761
E-Mail: PDemanchick@paoca.org

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

Counsel for:
Tanya McCloskey
Acting Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152

cc: Paul Diskin, Director of Bureau of Technical Utility Services
Renardo L. Hicks, Chief Counsel
Alexander R. Stahl, Esq., Regulatory Counsel, Aqua Pennsylvania Inc.
John Evans, Office of Small Business Advocate
David P. Zambito, Counsel, Suez Water Pennsylvania, Inc.
Susan Simms Marsh, Deputy General Counsel, Pennsylvania American Water Company
Jeffrey R. Hines, President and CEO, The York Water Company
Michael D. Klein, Counsel, National Association of Water Companies – Pennsylvania