



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

September 3, 2020

***Via Electronic Mail***

Thomas T. Niesen, Esq.  
Thomas, Niesen & Thomas, LLC  
212 Locust Street, Suite 302  
Harrisburg, PA 17101  
[tniesen@tntlawfirm.com](mailto:tniesen@tntlawfirm.com)

Re: Pennsylvania Public Utility Commission v.  
The City of Bethlehem – Water Department  
Supplement No. 15 to Tariff Water – Pa. P.U.C. No. 6  
Docket No.: R-2020-3020256  
**I&E Data Requests**

Dear Attorney Niesen:

Enclosed please find a copy of the Bureau of Investigation and Enforcement's (I&E) **Data Requests I&E-RE (nos 1-D through 41-D) - Grab**. Please restate each Data Request before responding and start each Data Request and response on a separate page. The responses should identify the responding person(s).

The responses to these Data Requests are due within fifteen (15) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please provide your responses to me via email at the email address listed below.

Copies are being served on parties of record per the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic Service.* Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "John M. Coogan", with a long horizontal flourish extending to the right.

John M. Coogan  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 313920  
(717) 783-6151  
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JMC/jfm  
Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter and Certificate of Service only - via e-file*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No.: R-2020-3020256
	:	
The City of Bethlehem – Water Department	:	
Supplement No. 15 to Tariff Water –	:	
Pa. P.U.C. No. 6	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Data Requests** dated September 3, 2020, in the manner and upon the persons listed below:

**Served via Electronic Mail Only**

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Prosecutor  
Bureau of Investigation and Enforcement  
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