



COMMONWEALTH OF PENNSYLVANIA

September 15, 2020

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

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

Dear Counsel:

Enclosed please find the Interrogatories, **Set I**, of the Office of Small Business Advocate (“OSBA”), to The City of Bethlehem-Bureau of Water in the above-referenced proceeding.

We respectfully request that you provide verified answers to these inquiries within fifteen (15) days of service. Additionally, please serve one copy on OSBA’s consultant, Brian Kalcic, as indicated below:

Brian Kalcic  
Excel Consulting  
225 S. Meramec Avenue, Suite 720 T  
St. Louis, MO 63105  
[excel.consulting@sbcglobal.net](mailto:excel.consulting@sbcglobal.net)

Copies of these Interrogatories will be served upon all parties, as indicated on the attached Certificate of Service. Additionally, this Certificate of Service has been electronically filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission, as required by 52 Pa. Code § 5.341(b).

If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Steven C. Gray

Steven C. Gray  
Senior Supervising  
Assistant Small Business Advocate  
Attorney ID No. 77538

*Enclosures*

cc: PA PUC Secretary Rosemary Chiavetta (Cover Letter & Certificate of Service only)  
Brian Kalcic  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Christine Maloni Hoover, Esq.  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101  
[choover@paoca.org](mailto:choover@paoca.org)  
(*Counsel for OCA*)

John M. Coogan, Esquire  
Bureau of Investigation & Enforcement  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[jcoogan@pa.gov](mailto:jcoogan@pa.gov)  
(*Counsel for BIE*)

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DATE: September 15, 2020

/s/ Steven C. Gray

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Steven C. Gray  
Senior Supervising  
Assistant Small Business Advocate  
Attorney ID No. 7753