

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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FAX (717) 783-7152  
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October 8, 2020

**Via Electronic Mail Only**

John H. Klemeyer, Esquire  
Borough of Milford Water Authority  
108 Tulip Circle  
Shohola, PA 18458

Re: Petition of Twin Lakes Utilities, Inc. For A  
Commission Order Authorizing The Acquisition  
Of Twin Lakes Utilities, Inc. By A Capable Public  
Utility Pursuant To 66 Pa. C.S. § 529  
Docket No. P-2020-3020914

Dear Mr. Klemeyer:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set I, in the above referenced proceeding.

In accordance with the discovery modifications contained in the Third Scheduling Order, we request that the Company provide verified answers to these inquiries within ten (10) 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:

Morgan N. DeAngelo  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
E-Mail: [MDeAngelo@paoca.org](mailto:MDeAngelo@paoca.org)

John H. Klemeyer, Esquire  
October 8, 2020  
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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).

Very truly yours,

/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. #50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

Enclosures:

cc: PUC Secretary Rosemary Chiavetta (Letter and Certificate of Service only)  
Certificate of Service

\*297596

CERTIFICATE OF SERVICE

Re: Petition of Twin Lakes Utilities, Inc. For A :  
Commission Order Authorizing The Acquisition : Docket No. P-2020-3020914  
Of Twin Lakes Utilities, Inc. By A Capable Public :  
Utility Pursuant To 66 Pa. C.S. § 529 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to the Borough of Milford Water Authority, Set I, 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 8<sup>th</sup> day of October 2020.

**SERVICE BY E-MAIL ONLY**

Scott B. Granger, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Michael W. Hassell, Esquire  
Garrett P. Lent, Esquire  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601

Sean Kemether  
Sagamore Estates  
Property Owners Association  
E-Mail: [sepoachairman@gmail.com](mailto:sepoachairman@gmail.com)

Jay L. Kooper, Secretary  
Twin Lakes Utilities, Inc.  
485C Route 1 South, Suite 400  
Iselin, NJ 08830-3020

John H. Klemeyer, Esquire  
Borough of Milford Water Authority  
108 Tulip Circle  
Shohola, PA 18458

Alexander R. Stahl, Esquire  
Aqua Pennsylvania, Inc.  
762 West Lancaster Avenue  
Bryn Mawr, PA 19010

Eric Bartolacci  
Department of Environmental Protection  
Office of Field Operations  
2174B Route 611  
Swiftwater, PA 18370

John J. Gallagher, Esquire  
711 Forrest Road  
Harrisburg, PA 17109

/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

Counsel for:  
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Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: October 8, 2020  
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