



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

October 8, 2020

Via Electronic Mail

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

Dear Attorney Niesen:

Enclosed please find a copy of the Bureau of Investigation & Enforcement's (I&E) **Interrogatories I&E RS (nos. 12-14) – Sakaya**. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to these Interrogatories are due within ten (10) calendar days pursuant to the Prehearing Order in this proceeding. Please provide your responses and forward them via email to 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,

John M. Coogan
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 313920
(717) 783-6151
jcoogan@pa.gov

JMC/ac
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 **Interrogatories** dated October 8, 2020, in the manner and upon the persons listed below.

Served via Electronic Mail Only

Thomas T. Niesen, Esq.
Thomas, Niesen & Thomas, LLC
212 Locust Street, Suite 302
Harrisburg, PA 17101
tniesen@tntlawfirm.com
Counsel for the City of Bethlehem

Stacy L. Sherwood
Jerome D. Mierzwa
Exeter Associates, Inc.
10480 Little Patuxent Parkway, Suite 300
Columbia, MD 21044
sherwood@exeterassociates.com
jmierzwa@exeterassociates.com
Witnesses for OCA

Christine Maloni Hoover, Esq.
Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
choover@paoca.org
lmyers@paoca.org

David J. Garrett
Resolve Utility Consulting
101 Park Avenue, Suite 1125
Oklahoma City, OK 73102
dgarrett@resolveuc.com
Witness for OCA

Steven C. Gray, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101-1923
sgray@pa.gov

Terry L. Fought, P.E.
780 Cardinal Drive
Harrisburg, PA 17111
TLFEngr@aol.com
Witness for OCA

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue, Suite 720-T
St. Louis, MO 63105
excel.consulting@sbcglobal.net
Witness for OSBA



John M. Coogan
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 313920