COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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



August 5, 2021

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

Re: Application of Aqua Pennsylvania
Wastewater, Inc. pursuant to Sections 507,
1102 and 1329 of the Public Utility Code for
Approval of its Acquisition of the
Wastewater System Assets of Lower
Makefield Township
Docket No. A-2021-3024267

Dear Mr. Niesen:

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

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within twenty (20) days of service. The OCA would appreciate your efforts to meet the modified discovery response deadlines that have been used in prior Applications filed pursuant to Sections 1102 and 1329 of the Public Utility Code. 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:

Ralph C. Smith Larkin & Associates, PLLC 15728 Farmington Road Livonia, MI 48154 E-Mail: OCAAquaMakefield@paoca.org Thomas T. Niesen, Esquire August 5, 2021 Page 2

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).

Sincerely,

/s/ Harrison W. Breitman
Harrison W. Breitman
Assistant Consumer Advocate
PA Attorney I.D. # 320580
E-Mail: HBreitman@paoca.org

Enclosures:

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

Certificate of Service

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CERTIFICATE OF SERVICE

Re: Application of Aqua Pennsylvania Wastewater,

Inc. pursuant to Sections 507, 1102 and 1329

of the Public Utility Code for Approval of its : Docket No. A-2021-3024267

Acquisition of the Wastewater System Assets

of Lower Makefield Township :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Aqua Pennsylvania Wastewater, Inc. Set III, 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 5th day of August 2021.

SERVICE BY E-MAIL ONLY

Erika L. McLain, Esquire Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor Harrisburg, PA 17120

ermclain@pa.gov

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

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Matthew S. Olesh, Esquire
Sydney N. Melillo, Esquire
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/s/ Harrison W. Breitman
Harrison W. Breitman
Assistant Consumer Advocate

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E-Mail: <u>HBreitman@paoca.org</u>

Erin L. Gannon

Senior Assistant Consumer Advocate

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efure@pa.gov

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

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

Fax: (717) 783-7152 Dated: August 5, 2021

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