COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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FAX (717) 783-7152
consumer@paoca.org

August 5, 2021

Via Electronic Mail Only

Thomas Wyatt, Esquire
Matthew S. Olesh, Esquire
Sydney N. Melillo, Esquire
Obermayer Rebmann Maxwell & Hippel LLP
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19102

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 Counsel:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set IV, 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 Wyatt, Esquire Matthew S. Olesh, Esquire Sydney N. Melillo, 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 Lower Makefield Township, Set IV, 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 Erin K. Fure, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
efure@pa.gov

Thomas T. Niesen, Esquire Thomas, Niesen & Thomas, LLC 212 Locust Street Suite 302 Harrisburg, PA 17101 tniesen@tntlawfirm.com Alexander R. Stahl, Esquire Aqua Pennsylvania, Inc. 762 West Lancaster Avenue Bryn Mawr, PA 19010 AStahl@aquaamerica.com

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/s/ Harrison W. Breitman
Harrison W. Breitman
Assistant Consumer Advocate
PA Attorney I.D. # 320580

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

Erin L. Gannon

Senior Assistant Consumer Advocate

PA Attorney I.D. # 83487 E-Mail: <u>EGannon@paoca.org</u> Counsel for:

Office of Consumer Advocate

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

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