



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

August 16, 2021

**Via Electronic Mail**

Thomas T. Niesen, Esq.  
Thomas, Niesen & Thomas, LLC  
212 Locust Street, Suite 302  
Harrisburg, PA 17101  
[tniesen@tntlawfirm.com](mailto:tniesen@tntlawfirm.com)

Re: Pennsylvania Public Utility Commission, v.  
The Borough of Hanover – Hanover Municipal Waterworks  
Docket No. R-2021-3026116  
**I&E Interrogatories**

Dear Counsel:

Enclosed please find the following Bureau of Investigation and Enforcement's (I&E) **Interrogatories** for the above-referenced proceeding:

**I&E Interrogatories Set RB (nos. 11-25) – Sakaya**  
**I&E Interrogatories Set RS (nos. 5-9) - 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 fifteen (15) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please provide your responses to me via email at the email address listed below.

Copies are being served on parties 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,

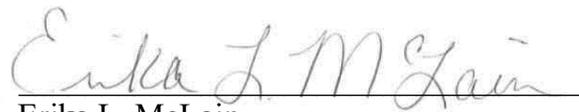
Erika L. McLain  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 320526  
(717) 783-6170  
[ermclain@pa.gov](mailto:ermclain@pa.gov)

Enclosures

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only – via e-file*)  
Per Certificate of Service



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

A handwritten signature in cursive script, reading "Erika L. McLain", written over a horizontal line.

Erika L. McLain  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 320526