

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
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800-684-6560

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 /pennoca

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

August 20, 2021

**Via Electronic Mail Only**

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

Re: Pennsylvania Public Utility Commission  
v.  
The Borough of Hanover –  
Hanover Municipal Waterworks  
Docket No. R-2021-3026116

Dear Mr. Niesen:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set IV and Set V, 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 fifteen (15) 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 consultants, as listed below:

Stacy L. Sherwood  
Exeter Associates, Inc.  
10480 Little Patuxent Pkwy  
Suite 300  
Columbia, MD 21044-3575  
E-Mail: [sherwood@exeterassociates.com](mailto:sherwood@exeterassociates.com)

Jerome D. Mierzwa  
Exeter Associates, Inc.  
10480 Little Patuxent Pkwy  
Suite 300  
Columbia, MD 21044-3575  
E-Mail: [jmierzwa@exeterassociates.com](mailto:jmierzwa@exeterassociates.com)

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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).

Sincerely,

/s/ Laura J. Antinucci  
Laura J. Antinucci  
Assistant Consumer Advocate  
PA Attorney I.D. # 327217  
E-Mail: [LAntinucci@paoca.org](mailto:LAntinucci@paoca.org)

Enclosures:

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

\*315884

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2021-3026116  
 :  
 The Borough of Hanover -- :  
 Hanover Municipal Waterworks :

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 Hanover – Hanover Municipal Waterworks, Set IV and Set V, 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 20<sup>th</sup> 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, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
[ermclain@pa.gov](mailto:ermclain@pa.gov)

Steven C. Gray, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[sgray@pa.gov](mailto:sgray@pa.gov)

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[tniesen@tntlawfirm.com](mailto:tniesen@tntlawfirm.com)

Charis Mincavage, Esquire  
Kenneth R. Stark, Esquire  
Jo-Anne Thompson, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[kstark@mcneeslaw.com](mailto:kstark@mcneeslaw.com)  
[jthompson@mcneeslaw.com](mailto:jthompson@mcneeslaw.com)

/s/ Laura J. Antinucci  
Laura J. Antinucci  
Assistant Consumer Advocate  
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Counsel for:  
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Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: August 20, 2021  
\*315282