

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Harrisburg, Pennsylvania 17101-1923  
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FAX (717) 783-7152  
consumer@paoca.org

August 26, 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 VI, 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 consultant, as listed below:

Terry L. Fought  
780 Cardinal Drive  
Harrisburg, PA 17111  
E-Mail: [foughtbusiness@gmail.com](mailto:foughtbusiness@gmail.com)

Thomas T. Niesen, Esquire  
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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

\*316471

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 VI, 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 26<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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Kenneth R. Stark, Esquire  
Jo-Anne Thompson, Esquire  
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[jthompson@mcneeslaw.com](mailto:jthompson@mcneeslaw.com)

/s/ Laura J. Antinucci  
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Assistant Consumer Advocate  
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E-Mail: [LAntinucci@paoca.org](mailto:LAntinucci@paoca.org)

Counsel for:  
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Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: August 26, 2021  
\*316472

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E-Mail: [EGannon@paoca.org](mailto:EGannon@paoca.org)