

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

 @pa_oca

 /pennoca

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

September 20, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission
v.
North Heidelberg Sewer Company and
Section 529 Investigation – North Heidelberg
Sewer Company
Docket Nos. M-2018-2645983
I-2018-3001161

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's (OCA) Letter regarding the Petition of Aqua Pennsylvania Wastewater, Inc. To Affirm And Clarify The Conditions Set Forth In Appendix A Of The Opinion And Order Entered February 9, 2018 (Petition) filed in the above-captioned proceeding on September 14, 2021.

Consistent with Commission precedent and, specifically, the case law cited by the Company in support of its Petition, if the Commission grants the Petition, the OCA submits that it should do so by clearly indicating that the authorization for deferred accounting is for accounting purposes only and does not constitute approval for ratemaking purposes.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

/s/ Erin L. Gannon
Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
E-Mail: EGannon@paoca.org

Enclosures:

cc: The Honorable Steven K. Haas (**email only**)
Office of Special Assistants (**email only**: ra-OSA@pa.gov)
Certificate of Service

*317620

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :
v. : Docket Nos. M-2018-2645983
North Heidelberg Sewer Company and : I-2018-3001161
Section 529 Investigation – North Heidelberg :
Sewer Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Letter In Lieu of Answer, 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 20th day of September 2021.

SERVICE BY E-MAIL ONLY

Carrie B. Wright, Esquire
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg PA 17120

Sean M. Cooper, Esquire
Cooper Law PLLC
P.O. Box 312
Elizabethtown, PA 17022

Tori L. Giesler, Esquire
FirstEnergy
2800 Pottsville Pike
P.O. Box 16001
Reading PA 19612-6001

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

Susan Simms Marsh, Esquire
Pennsylvania American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055

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

John D. Hollenbach
VP and General Manager
Suez Water Pennsylvania Inc.
4211 East Park Circle
Harrisburg, PA 17111

/s/ Erin L. Gannon
Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. #83487
Email: EGannon@paoca.org

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: September 20, 2021
*317621