


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\_oqa

 /pennoca

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

October 22, 2021

**Via Email Only**

Courtney L. Schultz, Esquire  
Shane P. Simon, Esquire  
Saul Ewing Arnstein & Lehr LLP  
1500 Market Street  
Centre Square West, 38th Floor  
Philadelphia, PA 19102

Re: Pennsylvania Public Utility Commission  
v.  
City of Lancaster – Water Department  
Docket No. R-2021-3026682

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set II, 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:

David J. Garrett  
Resolve Utility Consulting PLLC  
101 Park Avenue  
Suite 1125  
Oklahoma City, OK 73102  
E-Mail: [dgarrett@resolveuc.com](mailto:dgarrett@resolveuc.com)

Courtney L. Schultz, Esquire  
Shane P. Simon, Esquire  
October 22, 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/ Christy M. Appleby  
Christy M. Appleby  
Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
E-Mail: [CApplby@paoca.org](mailto:CApplby@paoca.org)

Enclosures:

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

\*318943

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :  
 :  
 v. : Docket No. R-2021-3026682  
 :  
 City of Lancaster – Water Department :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to City of Lancaster – Water Department, Set II, 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 22<sup>nd</sup> day of October 2021.

**SERVICE BY E-MAIL ONLY**

Gina L. Miller, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)

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

Courtney L. Schultz, Esquire  
Shane P. Simon, Esquire  
Saul Ewing Arnstein & Lehr LLP  
1500 Market Street  
Centre Square West, 38<sup>th</sup> Floor  
Philadelphia, PA 19102  
[Courtney.schultz@saul.com](mailto:Courtney.schultz@saul.com)  
[Shane.simon@saul.com](mailto:Shane.simon@saul.com)

/s/ Christy M. Appleby  
Christy M. Appleby  
Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
E-Mail: [CAAppleby@paoca.org](mailto:CAAppleby@paoca.org)

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: October 22, 2021  
\*318942