COMMONWEALTH OF PENNSYLVANIA



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

October 22, 2021



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

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 III, 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:

Jerome D. Mierzwa Exeter Associates, Inc. 10480 Little Patuxent Parkway Suite 300 Columbia, MD 21044-2690 E-Mail: jmierzwa@exeterassociates.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,

<u>/s/ Christy M. Appleby</u> Christy M. Appleby Assistant Consumer Advocate PA Attorney I.D. # 85824 E-Mail: <u>CAppleby@paoca.org</u>

Enclosures:

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

*318995

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 III, 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 22nd 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, 2nd Floor Harrisburg, PA 17120 ginmiller@pa.gov

Courtney L. Schultz, Esquire Shane P. Simon, Esquire Saul Ewing Arnstein & Lehr LLP 1500 Market Street Centre Square West, 38th Floor Philadelphia, PA 19102 <u>Courtney.schultz@saul.com</u> <u>Shane.simon@saul.com</u> Erin K. Fure, Esquire Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101-1923 <u>efure@pa.gov</u>

<u>/s/ Christy M. Appleby</u> Christy M. Appleby Assistant Consumer Advocate PA Attorney I.D. # 85824 E-Mail: CAppleby@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: October 22, 2021 *318993