

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

October 28, 2021

Via Electronic Mail Only

Michael W. Hassell, Esquire
Garrett Lent, Esquire
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

Re: Pennsylvania Public Utility Commission
v.
Aqua Pennsylvania, Inc. and
Aqua Pennsylvania Wastewater, Inc.
Docket Nos. R-2021-3027385 (Water)
C-2021-3028466 (Water)
R-2021-3027386 (Wastewater)
C-2021-3028467 (Wastewater)

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set XIV, in the above-referenced proceedings.

In accordance with the Commission's Rules of Practice and Procedure, as modified by the Prehearing Order issued on October 19, 2021 in this proceeding, we request that the Company provide verified answers to these inquiries within ten (10) 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:

Ralph C. Smith
Larkin & Associates, PLLC
15728 Farmington Road
Livonia, MI 48154
E-Mail: OCAAqua2021@paoca.org

Michael W. Hassell, Esquire
Garrett Lent, Esquire
October 28, 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/ Erin L. Gannon

Erin L. Gannon

Senior Assistant Consumer Advocate

PA Attorney I.D. # 83487

E-Mail: EGannon@paoca.org

Enclosures:

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

*319231

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :
 : Docket Nos. R-2021-3027385 (Water)
 v. : C-2021-3028466 (Water)
 : R-2021-3027386 (WW)
 Aqua Pennsylvania, Inc. and Aqua : C-2021-3028467 (WW)
 Pennsylvania Wastewater, Inc. :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc., Set XIV, 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 28th day of October 2021.

SERVICE BY E-MAIL ONLY

Scott B. Granger, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
sgranger@pa.gov

Steven C. Gray, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
sgray@pa.gov

Michael W. Hassell, Esquire
Garrett Lent, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
MHassell@postschell.com
GLent@postschell.com

Kimberly A. Joyce, Esquire
Mary McFall Hopper, Esquire
Alexander R. Stahl, Esquire
Aqua Pennsylvania, Inc.
762 W. Lancaster Ave.
Bryn Mawr, PA 19010
KAJoyce@essential.co
MMHopper@aquaamerica.com
ASTahl@aquaamerica.com

John W. Sweet, Esquire
Ria M. Pereira, Esquire
Elizabeth R. Marx, Esquire
Lauren Berman, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
PULP@pautilitylawproject.org

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue
Suite 720 T
St. Louis, MO 63105
excel.consulting@sbcglobal.net
Consultant for OSBA

Adeolu A. Bakare, Esquire
Charis Mincavage, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P. O. Box 1166
Harrisburg, PA 17108-1166
abakare@mcneeslaw.com
cmincavage@mcneeslaw.com
Counsel for Aqua Large Users Group

Alex Baumler, Esquire
Kilkenny Law, LLC
519 Swede Street
Norristown, PA 19401
alex@skilkennylaw.com
Counsel for East Norriton Township

Francine Weiner
1903 2nd Street
Langhorne, PA 19047
fhwhome@gmail.com

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

Christy M. Appleby
Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAAppleby@paoca.org

Harrison W. Breitman
Assistant Consumer Advocate
PA Attorney I.D. # 320580
E-Mail: HBreitman@paoca.org

George A. Bibikos, Esquire
GA BIBIKOS LLC
5901 Jonestown Road #6330
Harrisburg, PA 17112
gbibikos@gabibikos.com
*Counsel for Masthope Mountain
Community Association*

East Norriton Township
2501 Stanbridge Street
East Norriton, PA 19401-1616
rhart@eastnorritontwp.org

John Day
614 Runyon Avenue
Piscataway, NJ 08854
john@johnday.us

Lauren E. Guerra
Assistant Consumer Advocate
PA Attorney I.D. # 323192
E-Mail: LGuerra@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 28, 2021
*319232