

KOHN, SWIFT & GRAF, P.C.

1600 MARKET STREET, SUITE 2500

PHILADELPHIA, PENNSYLVANIA 19103-7225

JOSEPH C. KOHN
ROBERT A. SWIFT
ROBERT J. LAROCCA
DOUGLAS A. ABRAHAMS *
WILLIAM E. HOESE
STEVEN M. STEINGARD *
STEPHEN H. SCHWARTZ †
CRAIG W. HILLWIG
BARBARA L. GIBSON †
NEIL L. GLAZER †
ZAHRA R. DEAN *
AARTHI MANOHAR
ELIAS A. KOHN

(215) 238-1700

TELECOPIER (215) 238-1968

FIRM E-MAIL: info@kohswift.com

WEB SITE: www.kohswift.com

Email: rswift@kohswift.com

HAROLD E. KOHN
1914-1999
BAYARD M. GRAF
1926-2015

OF COUNSEL
GEORGE W. CRONER
LISA PALFY KOHN

† ALSO ADMITTED IN NEW YORK
* ALSO ADMITTED IN NEW JERSEY
* ONLY ADMITTED IN NEW YORK

July 12, 2022

Renardo L. Hicks, Chief Counsel
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Request for Independent Investigation, Dkt No. A-2021-3027268

Dear Mr. Hicks:

On March 4, 2022, I wrote the PUC Secretary, Rosemary Chiavetta, seeking an independent investigation of the apparent collusion between her and Aqua's outside counsel, Thomas Niesen, in setting a case deadline of 154 days contrary to the PUC's Final Implementation Order. I copied the three PUC Commissioners and others. By letter dated March 24, 2022, you notified me that the Commission "takes allegations of impropriety very seriously." You then filed both letters in the docket of Case No. A-2021-3027268.

Apparently, neither you nor the Commission take allegations of impropriety seriously. To my knowledge, there has been no investigation and, in the Commission's decision of July 8, 2022, no ruling on the impropriety. This is an outrage and a dereliction of duty on your part. If a public agency cannot police itself, then the task is left to the Attorney General of Pennsylvania and, in this case, the Commonwealth Court. I shall ask both to review this matter. I shall also docket this letter so there is a record in Case No. A-2021-3027268.

Very truly yours,



Robert A. Swift

RAS:yr

Cc via e-mail: All parties