

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

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February 15, 2023

**Via Electronic Mail Only**

Courtney L. Schultz, 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)

Re: Application of Aqua Pennsylvania  
Wastewater, Inc. pursuant to Sections 507,  
1102 and 1329 of the Public Utility Code for  
Approval of its Acquisition of the Water  
System Assets of Shenandoah Borough and  
MABS  
Docket No. A-2022-3034143

Dear Ms. Schultz:

Enclosed you will find 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 twenty (20) days of service. The OCA would appreciate your efforts to meet the modified discovery response deadlines that have been used in prior Applications filed pursuant to Sections 1102 and 1329 of the Public Utility Code. 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 group e-mail, as listed below:

E-Mail: [OCAShenandoah@paoca.org](mailto:OCAShenandoah@paoca.org)

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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).

Respectfully submitted,

/s/ David T. Evrard  
David T. Evrard  
Assistant Consumer Advocate  
PA Attorney I.D. # 33870  
[DEvrard@paoca.org](mailto:DEvrard@paoca.org)

Enclosures:

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

\*341468

CERTIFICATE OF SERVICE

Application of Aqua Pennsylvania :  
Wastewater, Inc. pursuant to Sections :  
507, 1102 and 1329 of the Public : Docket No. A-2022-3034143  
Utility Code for Approval of its :  
Acquisition of the Water System Assets :  
of Shenandoah Borough and MABS :

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 PA WW, Inc., 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 15<sup>th</sup> day of February 2023.

**SERVICE BY E-MAIL ONLY**

Carrie B. Wright, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
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**SERVICE BY USPS, POSTAGE PREPAID ONLY**

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/s/ David T. Evrard

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