

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
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August 10, 2023

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

Re: Newtown Artesian Water Company Petition  
for Extension of Time to Submit Lead Service  
Line Replacement Program  
Docket No. P-2023-3041859

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Answer to the Petition of Newtown Artesian Water Company in the above-referenced proceeding. As required under the Commission's regulations, the Office of Consumer Advocate's Answer is accompanied by a verification in accordance with 52 Pa. Code Section 1.36.

Copies have been served on the parties as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Harrison W. Breitman  
Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
HBreitman@paoca.org

Enclosures:

cc: Office of Administrative Law Judge (**email only:** [crainey@pa.gov](mailto:crainey@pa.gov))  
Office of Special Assistants (**email only:** [ra-OSA@pa.gov](mailto:ra-OSA@pa.gov))  
Sean Donnelly, TUS (**email only:** [sdonnelly@pa.gov](mailto:sdonnelly@pa.gov))  
Certificate of Service

\*4881-1420-1206

CERTIFICATE OF SERVICE

Newtown Artesian Water Company Petition :  
for Extension of Time to Submit Lead : Docket No. P-2023-3041859  
Service Line Replacement Program :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Answer to Newtown Artesian Water Company, 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 10<sup>th</sup> day of August 2023.

**SERVICE BY E-MAIL ONLY**

Richard A. Kanaskie, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
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Water Company*

/s/ Harrison W. Breitman  
Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
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Christine Maloni Hoover  
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PA Attorney I.D. # 50026  
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Counsel for:  
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5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Dated: August 10, 2023  
\*4855-4217-5094

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Newtown Artesian Water Co.	:	
Verified Letter Petition for	:	
Partial Waiver of Lead Service	:	Docket No. P-2023-3041859
Line Replacement Regulations Due	:	
to Absence of Lead Service Lines	:	

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ANSWER  
OF THE  
OFFICE OF CONSUMER ADVOCATE

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**I. INTRODUCTION**

On July 21, 2023, the Newtown Artesian Water Company (Newtown or Company) filed with the Pennsylvania Public Utility Commission (Commission) a Petition seeking an extension to file Lead Service Line Replacement Program (LSLR Program) and tariff revisions that will allow it to replace customer-owned lead service lines (COLSL), and to recover those costs as provided in Section 1311(b)(2) of the Public Utility Code, which was added to the Public Utility Code pursuant to Act 120 of 2018. 66 Pa. C.S. § 1311(b)(2). In its Petition the Company requests a one hundred and twenty day (120) extension to the date of November 22, 2023 citing the need to accumulate the required information and to design the program.

Based on the reasons stated by Newtown, the OCA is not opposed to a one hundred and twenty day (120) extension to the date of November 22, 2023 but would not support any further extensions.

Respectfully Submitted,

/s/ Harrison W. Breitman  
Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
HBreitman@paoca.org

Christine Maloni Hoover  
Deputy Consumer Advocate  
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Counsel for:  
Patrick M. Cicero  
Consumer Advocate

Office of Consumer Advocate  
555 Walnut Street  
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Harrisburg, PA 17101-1923  
(717) 783-5048  
DATED: August 10, 2023


BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Newtown Artesian Water Company :  
Petition for Extension of Time to : Docket No. P-2023-3041859  
Submit Lead Service Line :  
Replacement Program :

VERIFICATION

I, Patrick M. Cicero, hereby state that the facts set forth in the Office of Consumer Advocate's Answer to Newtown Artesian Water Company, are true and correct (or are true and correct to the best of my knowledge, information, and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

DATED: August 10, 2023

Signature:  \_\_\_\_\_  
Patrick M. Cicero  
Consumer Advocate

Address: Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923