# **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
www.oca.pa.gov

May 6, 2024

# Via Electronic Mail Only

PATRICK M. CICERO

Consumer Advocate

David P. Zambito, Esq. Jonathan P. Nase, Esq. Cozen O'Connor 17 North Second Street, Suite 1401 Harrisburg, PA 17101 dzambito@cozen.com jnase@cozen.com

Re: Pennsylvania Public Utility Commission v.

Veolia Water Pennsylvania, Inc. Docket Nos. R-2024-3045192 R-2024-3045193

Dear Counsel:

Enclosed you will find the Interrogatories of the Office of Consumer Advocate, Set 16, in this matter.

In accordance with the discovery modifications ordered at the Prehearing Conference held on March 27, 2024, we request that Veolia Water Pennsylvania, Inc. 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.

David P. Zambito, Esq. Jonathan P. Nase, Esq. May 6, 2024 Page 2

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

### OCAVeolia2024@paoca.org

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,

Christy Appleby Christy Appleby

Christy Appleby Senior Assistant Consumer Advocate PA Attorney I.D. # 85824 CAppleby@paoca.org

Enclosures:

cc: PUC Secretary Rosemary Chiavetta (Letter and Certificate of Service Only) Certificate of Service \*4870-7777-0159

## CERTIFICATE OF SERVICE

: Docket No	s. R-2023-3045192 (Water)
:	R-2023-3045193 (Wastewater)
:	C-2024-3047522
:	C-2024-3047410
;	C-2024-3047317
:	C-2024-3047315
:	C-2024-3047288
	C-2024-3047644
	:

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Veolia Water Pennsylvania, Inc., Set 16, 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. This document was filed electronically on the Commission's electronic filing system.

Dated this 6<sup>th</sup> day of May, 2024.

## SERVICE BY E-MAIL ONLY

David P. Zambito, Esq. Jonathan P. Nase, Esq. Cozen O'Connor17 North Second Street, Suite 1401 Harrisburg, PA 17101 dzambito@cozen.com jnase@cozen.com *Counsel for Veolia Water Pennsylvania, Inc*  Sharon E. Webb, Esq. Rebecca Lyttle, Esq. Office of Small Business Advocate Commerce Building, Suite 202 300 North Second St. Harrisburg, PA 17101 swebb@pa.gov relyttle@pa.gov *Counsel for OSBA* 

### SERVICE BY E-MAIL ONLY (continued)

Michael Podskoch, Esq. Bureau of Investigation & Enforcement Commonwealth Keystone Building 400 North Street, 2nd Floor West P. O. Box 3265 Harrisburg, PA 17105-3265 mpodskoch@pa.gov *Counsel for I&E*  Ria M. Pereira, Esq. Elizabeth R. Marx, Esq. John W. Sweet, Esq. Lauren N. Berman, Esq. 118 Locust Street Harrisburg, PA 17101 pulp@pautilitylawproject.org *Counsel for CAUSE-PA* 

hristy Appleby

Christy Appleby Senior Assistant Consumer Advocate PA Attorney I.D. # 85824 CAppleby@paoca.org

Darryl A. Lawrence Senior Assistant Consumer Advocate Barrett C. Sheridan Assistant Consumer Advocate OCAVEOLIA2024@paoca.org

*Counsel for:* Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 717-783-5048

Dated: May 6, 2024