

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

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

July 19, 2024

**Via Electronic Filing**

Michael W. Hassell, Esquire  
Garrett P. Lent, Esquire  
Nicholas Stobbe, Esquire  
Post & Schell  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
mhassell@postschell.com  
glent@postschell.com  
nstobbe@postschell.com

Re: Pennsylvania Public Utility Commission  
v.  
Aqua Pennsylvania, Inc. and  
Aqua Pennsylvania Wastewater, Inc.  
Docket Nos. R-2024-3047822(Water)  
R-2024-3047824(Wastewater)

Dear Counsel,

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set 20, in this matter.

Pursuant to the discovery modifications adopted at the Prehearing Conference held in this case on July 1, 2024, verified answers to the inquiries are due within ten (10) calendar 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.


Michael W. Hassell, Esquire  
Garrett P. Lent, Esquire  
Nicholas Stobbe, Esquire  
July 19, 2024

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

OCAAqua2024@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,

  
Melanie Joy El Atieh  
Deputy Consumer Advocate  
PA Attorney I.D. # 209323  
melatieh@paoca.org

Enclosures:

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

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :  
v. : Docket Nos. R-2024-3047822(Water)  
Aqua Pennsylvania, Inc. and : R-2024-3047824(Wastewater)  
Aqua Pennsylvania Wastewater, Inc. :

I hereby certify that I have this day filed electronically on the Commission’s electronic filing system and served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc. (collectively “Aqua”), Set 20 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 19<sup>th</sup> day of July 2024.

SERVICE BY E-MAIL ONLY

Steven Gray, Esquire  
Rebecca Lyttle, Assistant Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor, Forum Place  
Harrisburg, PA 17101  
sgray@pa.gov  
relyttle@pa.gov  
*OSBA*

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

Carrie B. Wright, Esquire  
Pennsylvania Public Utility Commission  
Bureau of Investigation & Enforcement  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120  
carwright@pa.gov  
*Counsel for I&E*

Adeolu A. Bakare, Esquire  
Charis Mincavage, Esquire  
Harrison Ryan Block, Esquire  
McNEES WALLACE & NURICK LLC  
100 Pine Street  
P. O. Box 1166  
Harrisburg, PA 17108-1166  
abakare@mcneeslaw.com  
cmincavage@mcneeslaw.com  
rblock@mcneeslaw.com  
*Counsel for Aqua Large Users Group*

SERVICE BY E-MAIL ONLY (continued)

Michael W. Hassell, Esquire  
Garrett P. Lent, Esquire  
Nicholas Stobbe, Esquire  
Post & Schell  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
mhassell@postschell.com  
glent@postschell.com  
nstobbe@postschell.com  
*Counsel for Aqua*

Renardo L. Hicks, Esquire  
Bryce R. Beard, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
Harrisburg, PA 17101  
rhicks@eckertseamans.com  
bbeard@eckertseamans.com  
*Counsel for SCH USA*

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

Robert J. Fogarty  
628 Fair Street  
Nescopeck PA  
Rjfl2@verizon.net

Susan Unvarsky  
151 Brook Street  
Sugar Notch PA 18706  
sunvarsky24@gmail.com

Sebastian Borriello  
5065 Ryan Road  
Pipersville PA 18947  
sebby21@hotmail.com

Counsel for:  
Patrick M. Cicero  
Consumer Advocate

Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
Date: July 19, 2024


Kimberly A. Joyce, Esquire  
Alexander R. Stahl, Esquire  
Aqua Pennsylvania  
762 W. Lancaster Avenue  
Bryn Mawr, PA 19010  
kajoyce@essential.co  
astahl@aquaamerica.com  
*Counsel for Aqua*

Lauren M. Burge, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
600 Grant Street, 44th Floor  
Pittsburgh, PA 15219  
lburge@eckertseamans.com  
*Counsel for SCH USA*

Carl R. Shultz, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
Harrisburg, PA 17101  
kmoury@eckertseamans.com  
*Counsel for New Wilmington Municipal Authority*

Steven Boyanowski  
34 Willow Way  
Dallas PA 18612  
judybccd@gmail.com

Ronald Roebuck  
71 Edgerock Drive  
Drums PA 18222  
Pinheads81@aol.com

  
Melanie Joy El Atieh  
Deputy Consumer Advocate  
PA Attorney I.D. # 209323  
melatieh@paoca.org

Gina L. Miller  
Senior Assistant Consumer Advocate  
Andrew J. Zerby  
Jacob D. Guthrie  
Assistant Consumer Advocates  
OCAAqua2024@paoca.org