

COMMONWEALTH OF PENNSYLVANIA



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Consumer Advocate

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July 25, 2024

**Via Electronic Mail Only**  
Michael W. Hassell, Esquire  
Garrett P. Lent, Esquire  
Post & Schell, P.C.  
17 North Second Street  
12<sup>th</sup> Floor  
Harrisburg, PA 17101  
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[glent@postschell.com](mailto:glent@postschell.com)

Re: Application of Aqua Pennsylvania  
Wastewater, Inc. for Approval of its  
Acquisition of the Wastewater System  
Assets of the City of Beaver Falls  
Docket No. A-2022-3033138

Dear Counsel:

Enclosed please find Interrogatories of the Office of Consumer Advocate, Set 3, in this matter.

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: [OCAAquaBFalls@paoca.org](mailto:OCAAquaBFalls@paoca.org)

Michael W. Hassell, Esquire  
Garrett P. Lent, Esquire  
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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/ Erin L. Gannon

Erin L. Gannon  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 83487  
EGannon@paoca.org

Enclosures

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

CERTIFICATE OF SERVICE

Application of Aqua Pennsylvania :  
Wastewater, Inc. pursuant to Sections 1102, :  
1329 and 507 of the Public Utility Code for : Docket No. A-2022-3033138  
Approval of its Acquisition of the Wastewater :  
System Assets of the City of Beaver Falls :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories – Set 3 to Aqua Pennsylvania Wastewater Inc., 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 25<sup>th</sup> day of July 2024.

SERVICE BY E-MAIL ONLY

Carrie B. Wright, Esquire  
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Dated: July 25, 2024

*/s/ Erin L. Gannon*

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