

MARK J. SHAW, ESQ.
ADMITTED IN PA AND OH
DIRECT DIAL 814-870-7607
E-MAIL: MSHAW@MIJB.COM

July 31, 2024

VIA ELECTRONIC MAIL

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

Re: Joint Application of Deer Haven, L.L.C. and PL Utilities, LLC for approval of: (1) PL Utilities, LLC's acquisition of certain wastewater system assets of the Deer Haven, L.L.C.; (2) the abandonment by Deer Haven, L.L.C. of wastewater service to the public in Palmyra Township, Pike County Pennsylvania; and (3) PL Utilities, LLC to offer, render, furnish and supply wastewater service to the public in portions of Palmyra Township, Pike County, Pennsylvania
Docket Nos. A-2024-3049587 and A-2024-3049591


Dear Secretary Chiavetta:

Attached please find the verification pages from both J. Goren and G. Herbert which were mistakenly omitted from the original filing of the Responses to TUS Data Request Set 1, Nos. A-1 to A-8, A-10 to A-15, A-17 to A-19, A-22, A-24 to A-26, A-28 to A-31, A-33 to A-41, Joint Application of Deer Haven, L.L.C. and PL Utilities, LLC for approval of: (1) PL Utilities, LLC's acquisition of certain wastewater system assets of the Deer Haven, L.L.C.; (2) the abandonment by Deer Haven, L.L.C. of wastewater service to the public in Palmyra Township, Pike County Pennsylvania; and (3) PL Utilities, LLC to offer, render, furnish and supply wastewater service to the public in portions of Palmyra Township, Pike County, Pennsylvania filed on July 18, 2024.

Very truly yours,

MacDONALD, ILLIG, JONES & BRITTON LLP

By _____



Mark J. Shaw

July 31, 2024
Page -2-

MJS/nes/1880737.1

Attachment

cc: Adeolu A. Bakare, Esq., Counsel for Deer Haven, L.L.C. (*Via electronic mail*)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, by the manner indicated below, and in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party):

SERVICE AS FOLLOWS:

Via Electronic Mail

Patrick Cicero
Christine Hoover
Melanie Joy El Atieh
Office of Consumer Advocate
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1923
PCicero@paoca.org
choover@paoca.org
melatieh@paoca.org

Via Electronic Mail

NazAarah Sabree
Assistant Small Business Advocate
Office of Small Business
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov

Via Electronic Mail

Allison C. Kaster, Director
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
akaster@pa.gov

Via Electronic Mail

Clinton McKinley
Water/Wastewater Section of Bureau of
Technical Utility Services
cmckinley@pa.gov

Respectfully submitted,



Mark J. Shaw, Esq.
MacDONALD, ILLIG, JONES & BRITTON LLP
100 State Street, Suite 700
Erie, Pennsylvania 16507-1459
(814) 870-7607
Attorneys for: PL Utilities, LLC

TUS Data Request Set 1

Joint Application of Deer Haven, L.L.C. and PL Utilities, LLC for approval of: (1) PL Utilities, LLC's acquisition of certain wastewater system assets of the Deer Haven, L.L.C.; (2) the abandonment by Deer Haven, L.L.C. of wastewater service to the public in Palmyra Township, Pike County Pennsylvania; and (3) PL Utilities, LLC to offer, render, furnish and supply wastewater service to the public in portions of Palmyra Township, Pike County, Pennsylvania at Docket Nos. A-2024-3049587 and A-2024-3049591

VERIFICATION

I, Jacob Goren, hereby state that the averments set forth in the foregoing TUS Data Request Set 1 (Nos. A-10-15, A-17-19, A-22, A-24-25, and A-39-41) at Docket Nos. A-2024-3049587 and A-2024-3049591, are true and correct to the best of my knowledge, information, and belief. 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: 7.17.2024



Jacob Goren

TUS Data Request Set 1

Joint Application of Deer Haven, L.L.C. and PL Utilities, LLC for approval of: (1) PL Utilities, LLC's acquisition of certain wastewater system assets of the Deer Haven, L.L.C.; (2) the abandonment by Deer Haven, L.L.C. of wastewater service to the public in Palmyra Township, Pike County Pennsylvania; and (3) PL Utilities, LLC to offer, render, furnish and supply wastewater service to the public in portions of Palmyra Township, Pike County, Pennsylvania at Docket Nos. A-2024-3049587 and A-2024-3049591

VERIFICATION

I, Gregory Herbert, hereby state that the averments set forth in the foregoing TUS Data Request Set 1 (Nos. A-28-31, and A-33) at Docket Nos. A-2024-3049587 and A-2024-3049591, are true and correct to the best of my knowledge, information, and belief. 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: 7/18/2024



Gregory Herbert