

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

January 3, 2025

Via Electronic Mail Only

Michael W. Hassell, Esq.
Garrett P. Lent, Esq.
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101
mhassell@postschell.com
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 VII, 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

Michael W. Hassell, Esq.
Garrett P. Lent, Esq.
January 3, 2025
Page 2

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/ Emily A. Farren _____

Emily A. Farren, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 322910
EFarren@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 VII 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 3rd day of January 2025.

SERVICE BY E-MAIL ONLY

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

Michael W. Hassell, Esq.
Garrett P. Lent, Esq.
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101
mhassell@postschell.com
glent@postschell.com
Counsel for Aqua PA WW, Inc.

Kevin C. Higgins
Principal, Energy Strategies
111 East Broadway, Suite 1200
Salt Lake City, UT 84111
khiggins@energystrat.com

Rebecca Lyttle, Esq.
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
relyttle@pa.gov
Counsel for OSBA

Thomas J. Sniscak, Esq.
Whitney E. Snyder, Esq.
Hawke, McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17011
tjsniscak@hmslegal.com
wesnyder@hmslegal.com
Counsel for Municipal Protestants Patterson Heights Borough, Patterson Township, West Mayfield Borough, White Township

/s/ Emily A. Farren
Emily A. Farren, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 322910

Harrison W. Breitman, Esq.
Assistant Consumer Advocate

OCAAquaBFalls@paoca.org

Counsel for:
Patrick M. Cicero
Consumer Advocate

555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
717-783-5048

Dated: January 3, 2025