



OFFICE OF CONSUMER ADVOCATE  
1425 Strawberry Square  
Harrisburg, Pennsylvania 17120

IRWIN A. POPOWSKY  
Consumer Advocate

June 19, 1996

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95 JUN 19 PM 3:39  
PA P.U.C.  
INFO. CONTROL DIV.  
(717) 783-5048

**ORIGINAL**

John G. Alford, Secretary  
PA Public Utility Commission  
Room G-23, North Office Bldg.  
Harrisburg, PA 17105

Re: Petition of Philadelphia Suburban  
Water Company for Approval to  
Implement A Tariff Supplement  
Establishing a Distribution System  
Improvement Charge  
Docket No. P-00961036

Dear Secretary Alford:

Enclosed for filing please find an original and three (3) copies of the Office of Consumer Advocate's Answer to the Petition of PSWC for Leave to File A Reply to Comments/Answers and Petition for Leave to Supplement OCA Comments. In addition, please find for filing an original and ten (10) copies of OCA's Supplemental Comments.

Copies of the same have been provided to all parties of record as evidenced by the attached Certificate of Service.

Sincerely,

Dianne E. Dusman  
Assistant Consumer Advocate

Enclosures

cc: All Parties of Record  
36608

**DOCUMENT  
FOLDER**

KJR

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CERTIFICATE OF SERVICE

Re: Petition of Philadelphia Suburban Water Company For Approval to Implement A Tariff Supplement Establishing a Distribution System Improvement Charge  
Docket No. P-00961036

I hereby certify that I have this day served a true copy of the Office Of Consumer Advocate's Answer to the Petition of PSWC for Leave to File a Reply to Comments/Answers and Petition for Leave to Supplement OCA Comments, 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. In addition, I have served a true copy of the Office of Consumer Advocate's Supplemental Comments.

Dated this 19th day of June, 1996.

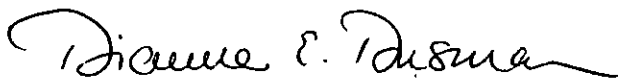
**BY U.S. FIRST CLASS MAIL**

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**BY HAND DELIVERY**

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Office of Trial Staff  
PA Public Utility Commission  
Pitnick Bldg., P.O. Box 3265  
Harrisburg, PA 17120



Dianne Dusman  
Assistant Consumer Advocates  
Counsel for:  
Office of Consumer Advocate  
1425 Strawberry Square  
Harrisburg, PA 17120  
(717) 783-5048 36320

ORIGINAL

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCUMENT  
FOLDER

PETITION OF PHILADELPHIA SUBURBAN :  
WATER COMPANY (PSWC) FOR APPROVAL :  
TO IMPLEMENT A TARIFF SUPPLEMENT :  
ESTABLISHING A DISTRIBUTION SYSTEM :  
IMPROVEMENT CHARGE :

Docket No. P-00961036

RECEIVED  
JUN 19 1996  
INF. CONTROL DIV.

ANSWER OF THE OFFICE OF CONSUMER ADVOCATE  
TO THE PETITION OF PSWC FOR LEAVE TO FILE A REPLY  
TO COMMENTS/ANSWERS  
AND  
PETITION FOR LEAVE TO SUPPLEMENT OCA COMMENTS

DOCKETED

JUN 20 1996

Pursuant to 52 Pa. Code §5.61, the Office of Consumer Advocate (OCA) hereby responds to the Petition of PSWC For Leave To File A Reply To the Comments and Statement of Randy M. Allen submitted by the OCA in the above-referenced proceeding. The OCA does not object to the granting of the Petition For Leave To File A Reply; however, the OCA does object to and would like to have an opportunity to respond to a number of the statements made by PSWC in its Petition and its Reply. Therefore, the OCA is also simultaneously requesting leave to submit the additional comments which follow this Petition.

In general, the Company has greatly mischaracterized the OCA's position on its proposal, and the OCA thus is compelled to respond at least briefly at this juncture. Because it is the OCA's understanding that the surcharges would not be permitted to be implemented without

evidentiary hearings (assuming that the Petition is not dismissed on legal grounds), a detailed response would be set forth in additional testimony by Mr. Allen at that time, if still relevant. In further support of its Answer and Petition, the OCA states as follows:

1. Paragraphs 1 through 3 of the Petition are admitted.

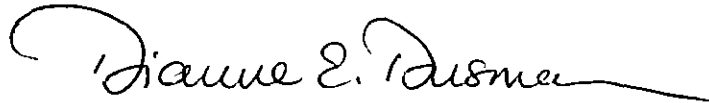
2. Paragraph 4 is denied in part. The Company has noted two *typographical* errors in the Statement of Mr. Allen which the OCA wishes to correct; otherwise this Paragraph is denied, as set forth more fully in the Supplemental Comments which follow.

3. Paragraph 5 is admitted in part and denied in part. As stated above, the OCA agrees that the PSWC Petition For Leave should be granted; however, because the Company itself has made several incorrect assertions in the course of its proposed Reply, permitting the OCA's Supplemental Comments to be filed will also further development of the issues based upon accurate and complete information.

4. Paragraph 6 is addressed to the Answer filed by the OSBA; therefore, the OCA has no response to Paragraph 6.

WHEREFORE, for the reasons set forth above, the OCA requests that in the event the instant PSWC Petition for Leave to File A Reply is granted, that the OCA request for leave to respond to the PSWC Reply be simultaneously granted and that the attached Supplemental Comments be made part of the record in this proceeding.

Respectfully submitted,



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Dianne E. Dusman  
Assistant Consumer Advocate

Counsel for:  
Irwin A. Popowsky  
Consumer Advocate

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1425 Strawberry Square  
Harrisburg, PA 17120  
(717) 783-5048

Dated: June 19, 1996  
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