

April 28, 2015

VIA FIRST CLASS MAIL AND ELECTRONIC MAIL

D. Troy Sellars Direct Phone 717-703-5890 Direct Fax 215-701-2416 tsellars@cozen.com

Christine Maloni Hoover Senior Assistant Consumer Advocate Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923

## Re: Pennsylvania Public Utility Commission et al. v. United Water Pennsylvania Inc.; Docket No. R-2015-2462723

# INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY UNITED WATER PENNSYLVANIA, INC. ON THE OFFICE OF CONSUMER ADVOCATE – SET II, Nos. 1-2 (To Thomas S. Catlin, Witness)

Dear Ms. Hoover:

Enclosed please find two (2) copies of United Water Pennsylvania Inc. Interrogatories and Requests for Production of Documents in the above-referenced discovery requests.

In accordance with ALJ Salapa's Prehearing Order No. 2, answers to this discovery shall be served in-hand within ten (10) calendar days. Also, please forward the verified responses as they are completed, rather than waiting until the responses to the full set are completed.

All active parties to this proceeding have been served in accordance with the enclosed Certificate of Service. If you have any questions, please feel free to contact me.

Sincerely,

COZEN O'CONNOR

By: D. Troy Sellars Counsel for *United Water Pennsylvania Inc.* 

DTS/kmg Enclosures

cc: Rosemary Chiavetta, Secretary (*Letter and Certificate of Service only*) Per Certificate of Service

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### CERTIFICATE OF SERVICE Docket No. R-2015-2462723; C-2015-2465209; C-2015-2466594; C-2015-2468927; and C-2015-2471689

I hereby certify that I have this day served a true copy of United Water Pennsylvania Inc.'s Interrogatories and Requests for Production of Documents Propounded by United Water Pennsylvania Inc. on the Office of Consumer Advocate – Set II, Nos. 1-2 (Witness Thomas S. Catlin), upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

#### VIA E-MAIL and FIRST CLASS MAIL:

Christine Maloni Hoover, Esquire Amy Hirakis, Esquire Lauren M. Burge, Esquire Office of Consumer Advocate 555 Walnut Street Forum Place, 5<sup>th</sup> Floor Harrisburg, PA 17101-1923 UWPA2015-EXTERNAL@paoca.org Gina L. Lauffer, Esquire Phillip C. Kirchner, Esquire Pennsylvania Public Utility Commission Bureau of Investigation & Enforcement Commonwealth Keystone Building 400 North Street, 2 West P.O. Box 3265 Harrisburg, PA 17105-3265 ginlauffer@pa.gov phikirchne@pa.gov

Daniel G. Asmus, Esquire Office of Small Business Advocate Suite 202, Commerce Tower 300 North Second Street Harrisburg, PA 17101-1303 dasmus@pa.gov

### VIA FIRST CLASS MAIL:

Amy Patton 174 Sterling Avenue Dallas, PA 18612 Docket No. C-2015-2468927 Robert Rosten 6518 Windmere Road Harrisburg, PA 17111 *Docket No. C-2015-2471689* 

DATED: April 28, 2015

D. Troy Sellars, Esquire Counsel for *United Water Pennsylvania Inc.*