



November 15, 2019

**VIA E-FILING**

**David P. Zambito**

Direct Phone 717-703-5892

Direct Fax 215-989-4216

dzambito@cozen.com

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

**Re: Implementation of Act 120 of 2018; Docket No. M-2019-3013286**

**SUEZ Water Pennsylvania Inc.'s Letter in Support of Aqua Pennsylvania Inc.'s Request for an Extension of Time to Respond to the Directed Questions Set 1 Propounded by the Bureau of Technical Utility Services**

Dear Secretary Chiavetta:

On October 24, 2019, the Bureau of Technical Utility Services ("TUS") issued a Secretarial Letter in the above-referenced matter, providing Class A water and wastewater utilities and certain other named stakeholders with thirty-four directed questions. Responses are due on November 22, 2019, and will be discussed at a Working Group meeting to be held on December 19, 2019.

Today, Aqua Pennsylvania Inc. ("Aqua") is filing a request for an extension of time to provide responses to the thirty-four questions. Aqua notes that the questions relate to several different areas of expertise, and that an extension of the response period will allow a more comprehensive response to the questions.

SUEZ Water Pennsylvania Inc. ("SWPA") supports Aqua's request for an extension. 52 Pa. Code § 1.15 provides that a request for an extension of time, made before the expiration of the prescribed period, may be granted "for good cause." SWPA respectfully submits that Aqua's request meets this standard.

SWPA respectfully submits that there is no need for the responses to TUS's directed questions to be filed almost four weeks before the Working Group meeting – particularly considering that the Thanksgiving holiday falls during this period. Aqua requested an extension from November 22 to December 9, 2019. This extension would not require a delay in the planned Working Group meeting, scheduled for December 19, 2019. To the contrary, Aqua's requested extension would facilitate a productive Working Group meeting on that date by permitting the parties to prepare more complete answers to the directed questions. By giving the stakeholders an additional nine business days to prepare responses, the Working Group meeting on December 19, 2019 will be more productive, perhaps eliminating the need for subsequent Working Group meetings. In addition, SWPA respectfully submits that filing responses five business days before the Working Group meeting gives all parties sufficient time to review the responses and prepare for the Working Group meeting.

SWPA therefore respectfully requests that the Pennsylvania Public Utility Commission ("Commission") grant Aqua's request for an extension of time, until December 9, 2019, to submit answers to TUS's Directed Questions in this matter. If you have any questions or concerns about this correspondence, please direct them to me.

Sincerely,

COZEN O'CONNOR



By: David P. Zambito

DPZ

cc: Paul Diskin, Director, Bureau of Technical Utility Services  
Renaldo Hicks, Chief Counsel  
Alexander R. Stahl, Esq., Regulatory Counsel, Aqua Pennsylvania Inc.  
Christine Maloni Hoover, Esq., Office of Consumer Advocate  
John Evans, Office of Small Business Advocate  
James Cagle, Vice President Rates and Regulatory Affairs, SUEZ N.A.  
John D. Hollenbach, General Manager and Vice President