

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

March 21, 2024

**Via Electronic Mail Only**

David P. Zambito, Esq.  
Jonathan P. Nase, Esq.  
Cozen O'Connor  
17 North Second Street, Suite 1401  
Harrisburg, PA 17101  
dzambito@cozen.com  
jnase@cozen.com

Re: Pennsylvania Public Utility Commission  
v.  
Veolia Water Pennsylvania, Inc.  
Docket Nos. R-2024-3045192  
R-2024-3045193

Dear Counsel:

Enclosed you will find the Interrogatories of the Office of Consumer Advocate, Set 11, in this matter.

In accordance with the Commission's Rules of Practice and Procedure, we request Veolia Water Pennsylvania, Inc. provide verified answers to these inquiries within fifteen (15) days of service. 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.

David P. Zambito, Esq.  
Jonathan P. Nase, Esq.  
March 21, 2024  
Page 2

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

[OCAVeolia2024@paoca.org](mailto:OCAVeolia2024@paoca.org)

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).

Sincerely,

  
\_\_\_\_\_  
Christy Appleby  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
CAAppleby@paoca.org

Enclosures:

cc: PUC Secretary Rosemary Chiavetta (Letter and Certificate of Service Only)  
Certificate of Service  
\*4870-7777-0159

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission : Docket Nos. R-2023-3045192 (Water)  
: R-2023-3045193 (Wastewater)  
: C-2024-3047522  
v. : C-2024-3047410  
: C-2024-3047317  
: C-2024-3047315  
Veolia Water Pennsylvania, Inc. : C-2024-3047288

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to Veolia Water Pennsylvania, Inc., Set 11, 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 21<sup>st</sup> day of March, 2024.

SERVICE BY USPS ONLY, POSTAGE PREPAID

John & Linda Brown  
7029 Brookdale Dr  
Harrisburg, PA 17111  
Linda\_rose@verizon.net

Norman Lowe  
2631 Old Berwick Rd  
Bloomsburg PA 17815  
janeandlarrylowe@gmail.com

SERVICE BY E-MAIL ONLY

David P. Zambito, Esq.  
Jonathan P. Nase, Esq.  
Cozen O’Connor 17 North Second Street,  
Suite 1401  
Harrisburg, PA 17101  
dzambito@cozen.com  
jnase@cozen.com  
*Counsel for Veolia Water Pennsylvania, Inc*

Sharon E. Webb, Esq.  
Rebecca Lyttle, Esq.  
Office of Small Business Advocate  
Commerce Building, Suite 202  
300 North Second St.  
Harrisburg, PA 17101  
webb@pa.gov  
relyttle@pa.gov  
*Counsel for OSBA*

David P. Zambito, Esq.  
Jonathan P. Nase, Esq.  
Cozen O’Connor 17 North Second Street,  
Suite 1401  
Harrisburg, PA 17101  
dzambito@cozen.com  
jnase@cozen.com  
*Counsel for Veolia Water Pennsylvania, Inc*

Michael Podskoch, Esq.  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
P. O. Box 3265  
Harrisburg, PA 17105-3265  
mpodskoch@pa.gov  
*Counsel for I&E*

SERVICE BY E-MAIL ONLY (continued)

Hunter & Katelyn Moyer  
60 White Oak Lane  
Etters PA 17319  
huntermoyer98@gmail.com

Elisa Giusto  
85 Greenspring Dr  
Mechanicsburg PA 17050  
elisagi@pcom.edu

  
\_\_\_\_\_  
Christy Appleby  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
CAappleby@paoca.org

Darryl A. Lawrence  
Senior Assistant Consumer Advocate  
Barrett C. Sheridan  
Assistant Consumer Advocate  
OCAVEOLIA2024@paoca.org

*Counsel for:*  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
717-783-5048

Dated: March 21, 2024