



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

April 18, 2016

David P. Zambito, Esquire
Cozen O' Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101

John F. Povilaitis, Esquire
Buchanan Ingersoll & Rooney, PC
409 North Second Street, Suite 500
Harrisburg, PA 17101-1357

Re: Joint Application of Pennsylvania American Water Company (PAWC) and the Sewer Authority of the City of Scranton for approval of 1) the transfer, by sale, of substantially all of the Sewer Authority of the City of Scranton's Sewer System and Sewage Treatment Works assets, properties and rights related to its wastewater collection and treatment system to PAWC, and 2) the right of PAWC to begin to offer or furnish wastewater service to the public in the City of Scranton and the Borough of Dunmore, Lackawanna County, Pennsylvania
Docket No. A-2016-2537209

Dear Mr. Zambito and Mr. Povilaitis:

Enclosed please find two (2) copies of the Bureau of Investigation and Enforcement's (I&E) Interrogatories, **I&E-1 through I&E-21**. Please restate each Interrogatory before responding, and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to these Interrogatories are due within Twenty (20) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please provide two (2) copies of your responses and forward them to me at Post Office Box 3265, Harrisburg, PA 17105-3265.

If you have any questions, please contact me at (717) 783-7998.

Sincerely,

Allison C. Kaster
Senior Prosecutor
Bureau of Investigation and Enforcement
PA Attorney I.D. #93176

ACK/sea
Enclosure

cc: Parties of Record
Secretary Chiavetta (Cover Letter and COS only)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Joint Application of Pennsylvania :
American Water Company (PAWC) and :
the Sewer Authority of the City of :
Scranton for approval of 1) the transfer, :
by sale, of substantially all of the Sewer :
Authority of the City of Scranton's Sewer : Docket No. A-2016-2537209
System and Sewage Treatment Works :
assets, properties and rights related to its :
wastewater collection and treatment :
system to PAWC, and 2) the right of :
PAWC to begin to offer or furnish :
wastewater service to the public in the :
City of Scranton and the Borough of :
Dunmore, Lackawanna County, :
Pennsylvania :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatories** dated
April 18, 2016, either personally, by first class mail, electronic mail, express mail and/or
by fax upon the persons listed below, in accordance with the requirements of
52 Pa. Code § 1.54 (relating to service by a party):

John F. Povilaitis, Esquire
Alan Michael Seltzer, Esquire
Buchanan Ingersoll & Rooney, PC
409 North Second Street
Suite 500
Harrisburg, PA 17101-1357

Sharon E. Webb, Esquire
Office of Small Business Advocate
300 North Second Street
Suite 202
Harrisburg, PA 17101

David P. Zambito, Esquire
D. Troy Sellars, Esquire
Cozen O' Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101

Paul J. Walker, Esquire
The Sewer Authority of the City of Scranton
205 North Washington Ave. #1
Scranton, PA 18503

Christine M. Hoover, Esquire
Erin L. Gannon, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101-1923

Jeffrey J. Belardi, Esquire
The Sewer Authority of the City of Scranton
410 Spruce Street, 4th Floor
Scranton, PA 18503-1883

Susan Simms Marsh, Esquire
Pennsylvania American Water Company
800 Hersheypark Drive
Hershey, PA 17033

A handwritten signature in black ink that reads "Allison C. Kaster". The signature is written in a cursive style with a long, sweeping underline.

Allison C. Kaster
Senior Prosecutor
Bureau of Investigation and Enforcement
PA Attorney I.D. #93176