

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Harrisburg, Pennsylvania 17101-1923
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consumer@paoca.org

April 22, 2016

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

Re: Joint Application of Pennsylvania-American Water Company 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 Pennsylvania-American Water Company, and (2) the rights of Pennsylvania-American Water Company 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 Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set I in the above-referenced proceeding, which are directed to Pennsylvania-American Water Company.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within twenty (20) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to

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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.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815
scott.j.rubin@gmail.com

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,

/s/ Erin L. Gannon
Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
E-Mail: EGannon@paoca.org

Enclosures

cc: PUC Secretary Chiavetta, (letter and Certificate of Service only)
Certificate of Service

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CERTIFICATE OF SERVICE

Joint Application of Pennsylvania-American :
Water Company 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 : Docket No. A-2016-2537209
assets, properties and rights related to its :
wastewater collection and treatment system to :
Pennsylvania-American Water Company, and :
(2) the rights of Pennsylvania-American Water :
Company to begin to offer or furnish wastewater :
service to the public in the City of Scranton and :
the Borough of Dunmore, Lackawanna County, :
Pennsylvania.

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Pennsylvania-American Water Company, Set I, 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:

Dated this 22nd day of April 2016.

SERVICE BY E-MAIL AND INTER-OFFICE MAIL

Allison C. Kaster, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

SERVICE BY E-MAIL AND FIRST CLASS MAIL, POSTAGE PREPAID

Sharon Webb, Esquire
Office of Small Business Advocate
Suite 202, Commerce Building
300 N. Second Street
Harrisburg, PA 17101

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

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D. Troy Sellars
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17 North Second Street, Suite 1410
Harrisburg, PA 17101

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

SERVICE BY FIRST CLASS MAIL, POSTAGE PREPAID

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

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

/s/ Erin L. Gannon

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