

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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April 27, 2016

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409 North Second Street, Suite 500  
Harrisburg, PA 17101

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 III in the above-referenced proceeding, which are directed to the Joint Applicants.

The OCA discovery served on April 22, 2016 was identified as OCA Set I to PAWC. The parties have agreed to rename that discovery OCA Set II to the Joint Applicants.

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:

Terry L. Fought  
780 Cardinal Drive  
Harrisburg, PA 17111  
[TLFEngr@aol.com](mailto:TLFEngr@aol.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](mailto: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, Set III to the Joint Applicants, 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 27<sup>th</sup> 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

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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, 4<sup>th</sup> 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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