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April 19, 2016

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VIA HAND DELIVERY

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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, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: In 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

JOINT APPLICANTS' RESPONSES TO BTUS DATA REQUESTS SET 1 (A-1 through A-18)

Dear Secretary Chiavetta:

Enclosed please find the Joint Applicants' Responses to BTUS Data Requests Set I (A-1 through A-18) in the above-referenced matter. A CD-Rom of the filing has also been enclosed for your convenience. As a courtesy, all active parties to this proceeding have been served in accordance with the enclosed Certificate of Service.

If you have any questions regarding these responses, please direct them to me. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR

By David P. Zambito

Counsel for Pennsylvania-American Water Company

DPZ/kmg
Enclosures

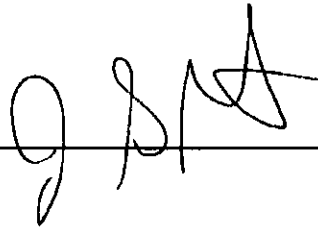
cc: Sean Donnelly, P.E., Bureau of Technical Utility Services (via Hand Delivery, including CD-Rom)

VERIFICATION

I, James Merante, Director - Financial Strategy, Planning and Decision Support, of Pennsylvania-American Water Company, hereby state that the facts set forth above, in the response(s) which I have sponsored, are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date:

4/19/16



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PA 110
SECRETARY'S BUREAU

VERIFICATION

I, Michael Guntrum, Senior Project Engineer, of Pennsylvania-American Water Company, hereby state that the facts set forth above, in the response(s) which I have sponsored, are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 4/18/16




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78-110
SECRETARY'S BUREAU

VERIFICATION

I, Eugene Christopher Abruzzo, Director, Water Quality and Environmental Compliance, of Pennsylvania-American Water Company, hereby state that the facts set forth above, in the response(s) which I have sponsored, are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: April 18, 2016



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SECRETARY'S BUREAU

VERIFICATION

I, Bernard Grundusky, Director Business Development, of Pennsylvania-American Water Company, hereby state that the facts set forth above, in the response(s) which I have sponsored, are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 04-18-2016 Bernard J Grundusky

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SECRETARY'S OFFICE

VERIFICATION

I, Scott Fogelsanger, Senior Business Development Manager, of Pennsylvania-American Water Company, hereby state that the facts set forth above, in the response(s) which I have sponsored, are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

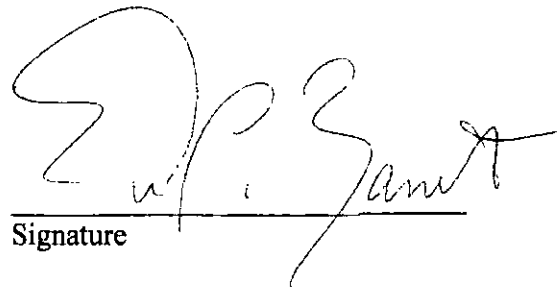
Date: 4/18/2016

Scott P. Fogelsanger

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LA 2100
SECRETARY'S BUREAU

VERIFICATION

I, Eugene P. Barrett, Executive Director, Scranton Sewer Authority, hereby verify that the information in the foregoing Response is true and correct to the best of my information, knowledge and belief. I understand that the statements are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to the unsworn falsification to authorities.



Signature

Dated: April 14, 2016

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PAULSON BUREAU
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE
In Re: Joint Application of Pennsylvania-American Water Company and
the Sewer Authority of the City of Scranton
Docket No. A-2016-2537209

I hereby certify that I have this day served a true copy of the foregoing Responses to BTUS Data Requests (A-1 thru A-18) of Pennsylvania-American Water Company and Sewer Authority of the City of Scranton, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA FIRST CLASS MAIL:

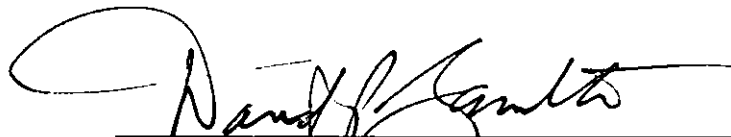
Allison C. Kaster, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
P.O. Box 3265
Harrisburg, PA 17105-3265

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

Sharon E. Webb, Esquire
Office of Small Business Advocate
Commerce Building, Suite 202
300 North Second Street
Harrisburg, PA 17101-1303

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

DATED: April 19, 2016



David P. Zambito, Esquire
Counsel for *Pennsylvania-American Water Company*

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