



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

IN REPLY PLEASE  
REFER TO OUR FILE

June 28, 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-22 through I&E-28**. 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 five (5) calendar days pursuant to the Prehearing Order No. 2 dated May 10, 2016. 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/snc  
Enclosure

cc: Certificate of Service  
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 :  
System and Sewage Treatment Works assets, :     Docket No. A-2016-2537209  
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 June 28, 2016, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

**Served via First Class and Electronic Mail**

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

David P. Zambito, Esquire  
D. Troy Sellars, Esquire  
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Jeffrey J. Belardi, Esquire  
The Sewer Authority of the City of Scranton  
410 Spruce Street, 4<sup>th</sup> Floor  
Scranton, PA 18503-1883

Susan Simms Marsh, Esquire  
Pennsylvania American Water Company  
800 Hersheypark Drive  
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Sharon E. Webb, Esquire  
Office of Small Business Advocate  
300 North Second Street  
Suite 202  
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  
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Harrisburg, PA 17101-1923



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