

January 31, 2018

**VIA E-MAIL AND FIRST CLASS MAIL**

**David P. Zambito**

Direct Phone 717-703-5892

Direct Fax 215-989-4216

dzambito@cozen.com

Christine M. Hoover  
Senior Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5th Floor  
Harrisburg, PA 17101-1923

**Re: Petition of Delaware Sewer Company for an Investigation into Whether the Public Utility Commission Should Order a Capable Public Utility to Acquire Delaware Sewer Company; Docket No. I-2016-2526085**

**PENNSYLVANIA-AMERICAN WATER COMPANY RESPONSE TO THE OFFICE OF CONSUMER ADVOCATE INTERROGATORIES SET II (No. 1)**

Dear Ms. Hoover:

Enclosed please find Pennsylvania-American Water Company's Response to the above-referenced discovery request. All active parties to this proceeding have been served in accordance with the enclosed Certificate of Service. If you have any questions, please feel free to contact me.

Sincerely,

COZEN O'CONNOR



By: David P. Zambito  
Counsel for *Pennsylvania-American Water Company*

DPZ/kmg  
Enclosure

cc: Rosemary Chiavetta, Secretary (*Letter and Certificate of Service only*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Delaware Sewer Company for an :  
Investigation into Whether the Public Utility : Docket No. I-2016-2526085  
Commission Should Order a Capable Public :  
Utility to Acquire Delaware Sewer Company :

I hereby certify that I have this day served a true copy of Pennsylvania-American Water Company's Response to OCA Interrogatories Set II (No. 1), 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 AND ELECTRONIC MAIL:**

Thomas T. Niesen, Esquire  
Thomas, Niesen & Thomas, LLC  
212 Locust Street, Suite 600  
Harrisburg PA 17101  
tniesen@tntlawfirm.com  
Counsel for *Delaware Sewer Company*

Scott B. Granger, Esq.  
Allison C. Kaster, Esq.  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor West  
Harrisburg, PA 17120  
[sgranger@pa.gov](mailto:sgranger@pa.gov)  
[akaster@pa.gov](mailto:akaster@pa.gov)  
Counsel for *Bureau of Investigation and Enforcement*

Christine Maloni Hoover, Esquire  
Erin L. Gannon, Esquire  
Lauren M. Burge, Esquire  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
[choover@paoca.org](mailto:choover@paoca.org)  
[egannon@paoca.org](mailto:egannon@paoca.org)  
[lburge@paoca.org](mailto:lburge@paoca.org)  
Counsel for *Office of Consumer Advocate*

Alexander Stahl, Esq.  
Aqua Pennsylvania Wastewater, Inc.  
762 W. Lancaster Ave.  
Bryn Mawr, PA 19010  
Counsel for *Aqua Pennsylvania Wastewater Inc.*

DATED: January 31, 2018

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