COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560



May 24, 2019

David Zambito, Esquire Jonathan P. Nase, Esquire Cozen O'Connor 17 North Second Street Suite 1410 Harrisburg, PA 17101

Susan Simms Marsh, Esquire Pennsylvania-American Water Company 852 Wesley Drive Mechanicsburg, PA 17055

Re:

Application of Pennsylvania-American Water Company Pursuant to Sections 507, 1102, and 1329 of the Public Utility Code for Approval of its Acquisition of the Wastewater System Assets of Exeter Township

Docket No. A-2018-3004933

Dear Counsel:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set XI, in the above-referenced proceeding.

Consistent with the modifications to the Commission's discovery rules addressed in the Prehearing Conference Order dated April 22, 2019, we request that the Company provide verified answers to these inquires within five (5) days. Also, please forward the verified answers as they are completed, rather than waiting until the responses to 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:

Ashley E. Everette
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101
AEverette@paoca.org

David Zambito, Esquire Jonathan P. Nase, Esquire Susan Simms Marsh, Esquire May 24, 2019 Page 2

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).

Very truly yours,

Harrison W. Breitman Assistant Consumer Advocate

PA Attorney I.D. # 320580 E-Mail: <u>HBreitman@paoca.org</u>

Enclosures:

cc:

PUC Secretary Chiavetta, (Letter and Certificate of Service only)

Certificate of Service

*273074

CERTIFICATE OF SERVICE

Re: Application of Pennsylvania-American Water Company Pursuant to Sections

507, 1102, and 1329 of the Public Utility Code for Approval of its Acquisition of the Wastewater System

Assets of Exeter Township

Docket No. A-2018-3004933

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories, Set XI to Pennsylvania-American Water Company, 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 24th day of May 2019.

SERVICE BY E-MAIL and INTER-OFFICE MAIL

Erika McLain, Esquire Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120

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

Susan Simms Marsh, Esquire Pennsylvania-American Water Company 852 Wesley Drive Mechanicsburg, PA 17055

Samuel W. Cortes, Esquire Fox Rothschild LLP Eagleview Corporate Center 747 Constitution Drive, Suite 100 Exton, PA 19341

Joan E. London, Esquire Kozloff Stoudt, Professional Corporation 2640 Westview Drive Wyomissing, PA 19610 Barnett Satinsky, Esquire Fox Rothschild LLP 2000 Market Street, 20th Floor Philadelphia, PA 19103

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/s/ Harrison W. Breitman
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