



September 2, 2016

VIA HAND DELIVERY

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: Application of Pennsylvania-American Water Company for Approval of (1) the transfer, by sale, of substantially all of the Borough of New Cumberland's assets, properties and rights related to its wastewater collection and treatment system to Pennsylvania-American Water Company, (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the Borough of New Cumberland, Cumberland County, Pennsylvania, and (3) the right of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to three residential customers in Lower Allen Township, Cumberland County, Pennsylvania; Docket No. A-2016-2544151

JOINT STIPULATION FOR ADMISSION OF EVIDENCE

Dear Secretary Chiavetta:

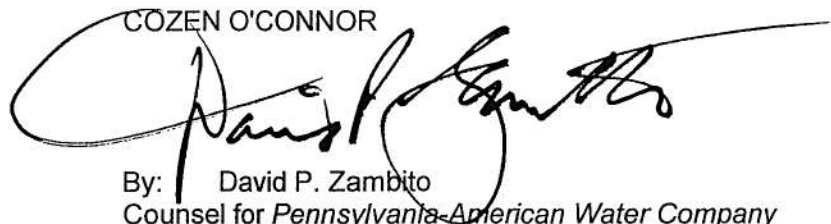
Enclosed for filing is the original Joint Stipulation for Admission of Evidence ("Stipulation") in the above-referenced proceeding. Also enclosed, pursuant to the terms of the Stipulation, is the original of each statement, exhibit, and document referenced in the Stipulation for inclusion in the evidentiary record in the above-referenced proceeding.

A CD-Rom containing of the Stipulation and each statement, exhibit, and document is also enclosed for your convenience.

Thank you for your attention to this matter. If you have any questions, please direct them to me. Please date-stamp the extra copy and return it with our messenger.

Sincerely,

COZEN O'CONNOR



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

DPZ/kmg
Enclosures

cc: Honorable Elizabeth H. Barnes (including *MS Word version*) (*without previously-served testimony and exhibits*)
Honorable Steven K. Haas (including *MS Word version*) (*without previously-served testimony and exhibits*)
Per Certificate of Service (*without previously-served testimony and exhibits*)

CERTIFICATE OF SERVICE

In re: Application of Pennsylvania-American Water Company for Approval of (1) the transfer, by sale, of substantially all of the Borough of New Cumberland's assets, properties and rights related to its wastewater collection and treatment system to Pennsylvania-American Water Company, (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the Borough of New Cumberland, Cumberland County, Pennsylvania, and (3) the right of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to three residential customers in Lower Allen Township, Cumberland County Pennsylvania; Docket No. A-2016-2544151

I hereby certify that I have this day served a true copy of Pennsylvania-American Water Company, the Office of Consumer Advocate, and the Pennsylvania Public Utility Commission's Bureau of Investigation & Enforcement's **Joint Stipulation for Admission of Evidence**, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA ELECTRONIC AND FIRST CLASS MAIL (without previously-served testimony and exhibits):

Christine M. Hoover, Esquire
Erin L. Gannon, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
choover@paoca.org
egannon@paoca.org

Susan Simms Marsh, Esquire
Melanie J. El Atieh, Esquire
Pennsylvania American Water Company
800 West Hersheypark Drive
Hershey, PA 17033
Susan.Marsh@amwater.com
Melanie.Elatieh@amwater.com

Gina L. Lauffer, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street, 2 West
PO Box 3265
Harrisburg, PA 17105-3265



David P. Zambito, Esquire (ID No. 80017)
George A. Bibikos, Esquire (ID No. 91249)
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
Telephone: 717-703-5892
Facsimile: 215-989-4216
E-mail: dzambito@cozen.com
E-mail: gbibikos@cozen.com

Date: September 2, 2016

Counsel for
Pennsylvania-American Water Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Administrative Law Judges
Elizabeth H. Barnes
Steven K. Haas

In re: Application of Pennsylvania-American Water :
Company for Approval of (1) the transfer, by sale, of :
substantially all of the Borough of New Cumberland’s :
assets, properties and rights related to its wastewater :
collection and treatment system to Pennsylvania-American :
Water Company, (2) the rights of Pennsylvania-American : Docket No. A-2016-2544151
Water Company to begin to offer or furnish wastewater :
service to the public in the Borough of New Cumberland, :
Cumberland County, Pennsylvania, and (3) the right of :
Pennsylvania-American Water Company to begin to offer or :
furnish wastewater service to three residential customers in :
Lower Allen Township, Cumberland County, Pennsylvania :

JOINT STIPULATION FOR ADMISSION OF EVIDENCE

Pennsylvania-American Water Company (“PAWC”), the Office of Consumer Advocate (“OCA”), and the Bureau of Investigation & Enforcement of the Pennsylvania Public Utility Commission (“I&E”), all active parties to the above-captioned proceeding, (singularly, a “Stipulating Party” and, collectively, the “Stipulating Parties”) file this Joint Stipulation for Admission of Evidence (“Stipulation”) in the above-captioned proceeding.¹ In support of the Stipulation, the Stipulating Parties represent as follows:

1. Paragraphs 1 through 12 (regarding “Background”) of the “Joint Petition for

¹ All Stipulating Parties are also signatory parties to the “Joint Petition for Approval of Unanimous Settlement of All Issues,” filed contemporaneously with the Stipulation in the above-captioned proceeding.

Approval of Unanimous Settlement of All Issues” (“Settlement”), filed on this same date in the above-captioned proceeding, are hereby incorporated by reference.

2. The Stipulating Parties hereby jointly stipulate to the authenticity of and admission into the evidentiary record in this matter of the statements, exhibits, and documents listed below. All such statements, exhibits, and documents are authenticated by the enclosed verifications from each supporting witness.

- A. Bernard J. Grundusky, Jr., PAWC Director of Business Development, PAWC Statement No. 1 (including PAWC Exhibits BJG-1 through BJG-3);
- B. Michael J. Guntrum, PAWC Senior Project Manager - Engineering, PAWC Statement No. 2 (including PAWC Exhibit MJG-1);
- C. Joseph F. Woodward, Jr., PAWC Senior Manager – Operations, PAWC Statement No. 3;
- D. John R. Cox, American Water Works Service Company Manager of Rates and Regulations, PAWC Statement No. 4;
- E. James S. Merante, American Water Works Service Company Director of Financial Strategy, Planning, and Decision Support for the Mid Atlantic Division, PAWC Statement No. 5; and,
- F. Capital Regional Water Contract Waste Hauling Permit No. WH-0916-18, effective date September 30, 2015.

3. This Stipulation is presented by the Stipulating Parties in conjunction with the Settlement, which is intended to settle all issues in the above-captioned proceeding. If the Commission rejects or otherwise modifies the Settlement, the Stipulating Parties reserve their respective procedural rights to object to the admission of the above-referenced statements, exhibits and documents, submit additional testimony and exhibits, and cross-examine witnesses at on-the-record evidentiary hearings.

4. This Stipulation is being presented, in conjunction with the Settlement, only to resolve issues in the above-captioned proceeding. Regardless of whether this Stipulation is

Susan Simms Marsh, Esquire
Melanie J. El Atieh, Esquire
PA Attorney ID Nos. 44689 and 209323
Pennsylvania-American Water Company
800 West Hersheypark Drive
Hershey, PA 17033
Telephone: (717) 531-3208
Facsimile: (717) 531-3399
E-mail: susan.marsh@amwater.com
E-mail: melanie.elatieh@amwater.com

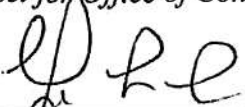
Counsel for Pennsylvania-American Water Company



Christine Maloni Hoover, Esquire
Erin L. Gannon, Esquire
PA Attorney ID Nos. 50026 and 83487
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
Telephone: (717) 783-5048
Facsimile: (717) 783-7152
E-mail: choover@paoca.org
E-mail: egannon@paoca.org

Date: 09-02-2016

Counsel for Office of Consumer Advocate



Gina L. Lauffer, Esquire
PA Attorney ID No. 313863
Pennsylvania Public Utility Commission
Bureau of Investigation & Enforcement
400 North Street, 2 West
P.O. Box 3265
Harrisburg, PA 17105-3265
Telephone: (717) 787-8754
Facsimile: (717) 783-6151
E-mail: ginlauffer@pa.gov

Date: 9/2/16

Counsel for Bureau of Investigation & Enforcement

VERIFICATION

Docket No. A-2016-2544151

I, Bernard J. Grundusky, Jr., Director of Business Development of Pennsylvania-American Water Company, hereby state that the facts set forth in the PAWC Statement No. 1 including PAWC Exhibits BJG-1 through BJG-3 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 also state that the enclosed copy of the Capital Regional Water Contract Waste Hauling Agreement, Permit No. WH-0916-18, effective September 30, 2105, of which Pennsylvania-American Water Company will take assignment, is a true and correct copy of such agreement 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).

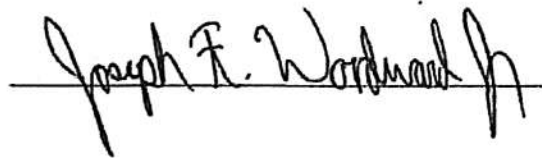


Date: September 2, 2016

VERIFICATION

Docket No. A-2016-2544151

I, Joseph F. Woodward, Jr., Senior Manager – Operations of Pennsylvania-American Water Company, hereby state that the facts set forth in the PAWC Statement No. 3 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).

A handwritten signature in black ink, reading "Joseph F. Woodward Jr.", is written over a horizontal line. The signature is cursive and includes a large, stylized initial "J" at the end.

Date: September 2, 2016

VERIFICATION

Docket No. A-2016-2544151

I, Michael J. Guntrum, Senior Project Manager of Pennsylvania-American Water Company, hereby state that the facts set forth in the PAWC Statement No. 2 including PAWC Exhibit MJG-1 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).

A handwritten signature in black ink, appearing to read "Michael J. Guntrum". The signature is written in a cursive style with a horizontal line underneath the name.

Date: September 2, 2016

VERIFICATION

Docket No. A-2016-2544151

I, John R. Cox, Manager of Rates and Regulations of American Water Works Service Company, Inc., hereby state that the facts set forth in the PAWC Statement No. 4 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).



A handwritten signature in cursive script, reading "John R. Cox", is written over a solid horizontal line.

Date: September 2, 2016

VERIFICATION

Docket No. A-2016-2544151

I, James S. Merante, Director of Financial Strategy, Planning and Decision Support for the Mid-Atlantic Division of American Water Works Service Company, Inc., hereby state that the facts set forth in the PAWC Statement No. 5 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).

A handwritten signature in black ink, appearing to read 'J. S. Merante', is written over a horizontal line. The signature is stylized and cursive.

Date: September 2, 2016