

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Harrisburg, Pennsylvania 17101-1923
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consumer@paoca.org

June 23, 2017

David P. Zambito, Esquire
COZEN O'CONNOR
17 North Second Street, Suite 1410
Harrisburg, PA 17101

Re: Application of Pennsylvania-American Water Company under Sections 1102 and 1329 of the Public Utility Code for Approval of its Acquisition of the Wastewater System Assets of The Municipal Authority of the City of McKeesport

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set III in the above-referenced proceeding. The Set III questions are directed to Herbert, Rowland & Grubic, one of the two utility valuation experts (UVE) used in this proceeding. If Pennsylvania-American is not willing to forward these questions to the UVE, please inform me as soon as possible.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within five (5) days of service pursuant to our agreement on discovery modifications. 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:

Glenn Watkins
Technical Associates, Inc.
1503 Santa Rosa Road
Suite 130
Richmond, VA 23229
watkinsg@tai-econ.com

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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).

Sincerely,



Christine Maloni Hoover
Senior Assistant Consumer Advocate
PA Attorney I.D. #50026
E-Mail: CHoover@paoca.org

Enclosures

cc: PUC Secretary Chiavetta, (letter and Certificate of Service only)
Certificate of Service

236148

CERTIFICATE OF SERVICE

Re: Application of Pennsylvania-American :
Water Company under Sections 1102 and 1329 of :
the Public Utility Code for Approval of its : Docket No. A-2017-2606103
Acquisition of the Wastewater System Assets of :
The Municipal Authority of the City of :
McKeesport :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Pennsylvania-American, Set III, 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 23rd day of June 2017.

SERVICE BY E-MAIL & INTER-OFFICE MAIL

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

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

Susan Simms Marsh, Esquire
Pennsylvania-American Water Company
800 West Hershey Park Drive
Hershey, PA 17033

David P. Zambito, Esquire
Jonathan P. Nase
George A. Bibikos, Esquire
COZEN O'CONNOR
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/s/ Christine Maloni Hoover
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Dated: June 23, 2017

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