

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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Harrisburg, Pennsylvania 17101-1923  
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July 19, 2017

Thomas Wyatt, Esquire  
Dilworth Paxson, LLP  
1500 Market Street, Suite 3500E  
Philadelphia, PA 19102

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  
Docket No. A-2017-2606103

Dear Counsel:

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

In accordance with the Commission's Rules of Practice and Procedure, and the modified discovery rules adopted in this proceeding, we request that the City of McKeesport and the Municipal Authority of the City of McKeesport provide verified answers to these inquiries within five (5) days of service. 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](mailto: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](mailto:CHoover@paoca.org)

Enclosures

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

237625

CERTIFICATE OF SERVICE

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 : Docket No. A-2017-2606103  
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, Set V, 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 19th day of July, 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  
COZEN O'CONNOR  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101

Thomas S. Wyatt  
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/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
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Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: July 17, 2017

Erin L. Gannon  
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\*237626