



April 25, 2018

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

**Jonathan P. Nase**

Direct Phone 717-773-4191

Direct Fax 215-372-2340

jnase@cozen.com

Thomas T. Niesen, Esquire  
Thomas, Niesen & Thomas, LLC  
212 Locust Street, Suite 302  
Harrisburg PA 17101

**Re: Joint Application of Aqua Pennsylvania, Inc. and the Borough of Phoenixville for approval of 1) the acquisition by Aqua of the water system assets of Phoenixville used in connection with the water service provided by Phoenixville in East Pikeland and Schuylkill Townships, Chester County, and in Upper Providence Township, Montgomery County, PA; and 2) the right of Aqua to begin to supply water service to the public in portions of East Pikeland Township, Chester County, and Upper Providence Township, Montgomery County, PA and 3) the abandonment by Phoenixville of public water service in East Pikeland Township, Chester County, and in Upper Providence Township, Montgomery County, and to certain locations in Schuylkill Township, Chester County, PA. Also request for approval of Section 507 PUMC contracts between Aqua PA and Phoenixville Borough; Docket Nos. A-2018-2642837 and A-2018-2642839**

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
PROPOUNDED BY PENNSYLVANIA-AMERICAN WATER COMPANY DIRECTED TO  
AQUA PENNSYLVANIA, INC. - SET I, Nos. 1-8**

Dear Mr. Niesen:

Enclosed please find two (2) copies of the above-referenced discovery requests. All active parties to this proceeding have been served in accordance with the enclosed Certificate of Service. If you have any questions, please contact me.

If you have any questions regarding this filing, please direct them to me. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR

By: Jonathan P. Nase

Counsel for *Pennsylvania-American Water Company*

JPN:kmg

Enclosure

cc: Rosemary Chiavetta, Secretary (Letter and Certificate of Service only)  
Per Certificate of Service  
Brian A. Ardire, Esquire

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Aqua Pennsylvania, Inc. and the Borough :  
of Phoenixville for approval of 1) the acquisition by Aqua of the :  
water system assets of Phoenixville used in connection with :  
the water service provided by Phoenixville in East Pikeland :  
and Schuylkill Townships, Chester County, and in Upper : Docket Nos. A-2018-2642837 and  
Providence Township, Montgomery County, PA; and 2) : A-2018-2642839  
the right of Aqua to begin to supply water service to the public in :  
portions of East Pikeland Township, Chester County, and :  
Upper Providence Township, Montgomery County, PA and 3) :  
the abandonment by Phoenixville of public water service in :  
East Pikeland Township, Chester County, and in Upper :  
Providence Township, Montgomery County, and to certain :  
locations in Schuylkill Township, Chester County, PA. Also :  
request for approval of Section 507 PUMC contracts between :  
Aqua PA and Phoenixville Borough. :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of Pennsylvania-American Water Company's Interrogatories and Request for Production of Documents, Set I, Nos. 1-8, directed to Aqua Pennsylvania, Inc., 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:**

Thomas T. Niesen, Esquire  
Thomas, Niesen and Thomas, LLC  
212 Locust Street, Suite 302  
Harrisburg, P A 17101  
Counsel for *Aqua Pennsylvania, Inc.*  
E-mail: tniesen@tntlawfirm.com

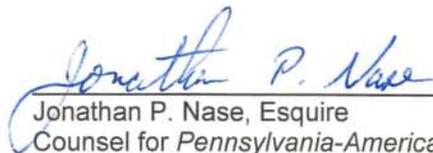
Adeolu A. Bakare, Esquire  
McNees, Wallace and Nurick, LLC  
100 Pine Street  
Harrisburg, PA 17101  
Counsel for *Borough of Phoenixville*  
E-mail: abakare@mcneeslaw.com

Richard A. Kanaskie, Director and  
Chief Prosecutor  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor West  
Harrisburg, PA 17120  
E-mail: rkanaskie@pa.gov

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

John Evans  
Office of Small Business Advocate  
Commerce Building, Suite 202  
300 North Second Street  
Harrisburg, PA 17101-1303  
E-mail: jorevan@pa.gov

DATED: April 25, 2018

  
Jonathan P. Nase, Esquire  
Counsel for *Pennsylvania-American Water Company*