

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
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FAX (717) 783-7152  
consumer@paoca.org

June 25, 2018

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

Re: Application of Pennsylvania-American  
Water Company Pursuant to Sections 1102  
and 1329 of the Public Utility Code for  
Approval of its Acquisition of the  
Wastewater System Assets of the Township  
of Sadsbury  
Docket No. A-2018-3002437

Dear Mr. Zambito:

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

In accordance with the Commission's Rules of Practice and Procedure as modified in a prior Section 1329 proceeding involving Pennsylvania-American Water Company, 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:

Ashley E. Everette  
Office of Consumer Advocate  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17101  
[AEverette@paoca.org](mailto:AEverette@paoca.org)

David P. Zambito, Esquire  
June 25, 2018  
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,



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  
\*252690

CERTIFICATE OF SERVICE

Re: Application of Pennsylvania-American Water :  
Company Pursuant to Sections 1102 and :  
1329 of the Public Utility Code for Approval : Docket No. A-2018-3002437  
of its Acquisition of the Wastewater System :  
Assets of the Township of Sadsbury :

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 Water Company, Set I, 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 25<sup>th</sup> day of June 2018.

SERVICE BY E-MAIL and INTER-OFFICE MAIL

Gina L. Miller, Esquire  
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  
800 Hersheypark Drive  
Hershey, PA 17033

Office of Small Business Advocate  
300 North Street  
Suite 202  
Harrisburg, PA 17101

David P. Zambito, Esquire  
Jonathan Nase, Esquire  
George A. Bibikos, Esquire  
Cozen O' Connor  
17 North Second Street  
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/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

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