

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560

FAX (717) 783-7152
consumer@paoca.org

June 29, 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 II in the above-referenced proceeding. The Set II 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
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101
AEverette@paoca.org

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June 29, 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

Enclosures:

cc: PUC Secretary Chiavetta, (Letter and Certificate of Service only)
Certificate of Service
*253386

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 II, 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 29th 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
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