



July 11, 2018

VIA E-FILING

Jonathan P. Nase

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Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
Harrisburg, PA 17120

Re: In re: Application and related filings of Pennsylvania-American Water Company under Sections 507, 1102(a), and 1329 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 507, 1102(a), 1329, for approval of its acquisition of wastewater system assets of Sadsbury Township, related wastewater service rights, fair market valuation ratemaking treatment, deferral of the post-acquisition improvement costs, and certain contracts with municipal corporations; Docket No. A-2018-3002437

Stipulation Regarding Discovery Rule Modifications

Dear Secretary Chiavetta:

Enclosed please find the Stipulation Regarding Discovery Rule Modifications in the above-referenced matter. Copies have been served on the parties as indicated on the attached Certificate of Service. Should you have any questions or concerns, please feel free to contact me.

Sincerely,

COZEN O'CONNOR

By: Jonathan P. Nase
Counsel for *Pennsylvania-American Water Company*

JPN:kmg
Enclosures

cc: Hon. Darlene D. Heep
Per Certificate of Service
Susan Simms Marsh, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application and related filings of Pennsylvania- :
American Water Company under Sections 507, 1102(a), and :
1329 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ :
507, 1102(a), 1329, for approval of its acquisition of : Docket No. A-2018-3002437
wastewater system assets of Sadsbury Township, related :
wastewater service rights, fair market valuation ratemaking :
treatment, deferral of the post-acquisition improvement costs, :
and certain contracts with municipal corporations :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Stipulation Regarding Discovery Rule Modifications, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND FIRST CLASS MAIL:

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Counsel for *Sadsbury Township*

DATED: July 11, 2018


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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Administrative Law Judge Darlene D. Heep

In re: Application and related filings of Pennsylvania- :
American Water Company under Sections 507, 1102(a), :
and 1329 of the Pennsylvania Public Utility Code, 66 Pa. :
C.S. §§ 507, 1102(a), 1329, for approval of its acquisition : Docket No. A-2018-3002437
of wastewater system assets of Sadsbury Township, :
related wastewater service rights, fair market valuation :
ratemaking treatment, deferral of the post-acquisition :
improvement costs, and certain contracts with municipal :
corporations

**STIPULATION REGARDING
DISCOVERY RULE MODIFICATIONS**

Pennsylvania-American Water Company (“PAWC”), the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), the Pennsylvania Office of Consumer Advocate (“OCA”), and the Township of Sadsbury (collectively, the “Parties”) in the above-captioned matter stipulate to the following modifications of the Commission’s Rules of Administrative Practice and Procedure regarding discovery:

1. Answers to written interrogatories shall be served in-hand within five (5) calendar days of service.
2. Objections to interrogatories shall be communicated orally within two (2) calendar days and in writing within three (3) calendar days of service of the interrogatories.
3. Motions to dismiss objections and/or direct the answering of interrogatories shall be filed within two (2) calendar days of service of the written objections.
4. Answers to motions to dismiss objections and/or direct the answering of interrogatories shall be filed within two (2) calendar days of service of such motions.

5. Responses to requests for document production, entry for inspection, or other purposes must be served in-hand within five (5) calendar days.
6. Requests for admissions will be deemed admitted unless answered or denied within three (3) calendar days of service.
7. Discovery and all discovery-related pleadings, such as objections, motions, or answers, served after 12:00 noon on a Friday or after 12:00 noon the day before a holiday recognized by the Commission will be deemed to have been served on the following business day for purposes of tracking due dates.
8. The parties are directed to make every reasonable effort to comply with the discovery response times set forth in this agreement. In those instances when compliance is not possible, despite a party's best efforts, the responding party shall so advise and the parties shall work together to address the requests and responses on a timely basis.
9. These discovery rule modifications are for the limited purpose of this proceeding and should not be viewed as binding, or otherwise limiting, upon positions taken by the parties in any other proceeding.

[Signatures appear on next page.]

Accepted and agreed to this 10th day of July, 2018.



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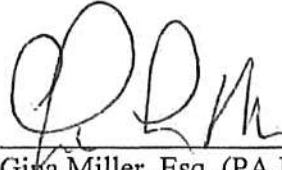
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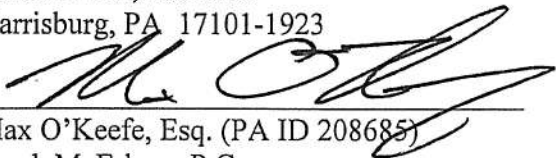
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