



March 2, 2020

VIA E-FILING

Jonathan P. Nase

Direct Phone 717-773-4191

Direct Fax 215-372-2340

jnase@cozen.com

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

Re: Application of Pennsylvania-American Water Company under Section 1102(a) of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1102(a), for approval of (1) the transfer, by sale, of substantially all of the Borough of Kane Authority's assets, properties and rights related to its wastewater collection and treatment system to Pennsylvania-American Water Company, and (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the Borough of Kane, and in a portion of Wetmore Township, McKean County, Pennsylvania; Docket Nos. A-2019-3014248 et al.

Stipulation Regarding Discovery Rule Modifications

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("Commission") is the fully-executed Stipulation Regarding Discovery Rule Modifications in the above-referenced matter. Copies have been served as indicated on the enclosed certificate of service.

Please contact me if you have any questions or concerns.

Sincerely,

COZEN O'CONNOR

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

JPN
Enclosures

cc: Hon. Joel H. Cheskis
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania-American Water :
Company under Section 1102(a) of the Pennsylvania :
Public Utility Code, 66 Pa. C.S. § 1102(a), for :
approval of (1) the transfer, by sale, of substantially all :
of the Borough of Kane Authority's assets, properties :
and rights related to its wastewater collection and :
treatment system to Pennsylvania-American Water :
Company, and (2) the rights of Pennsylvania- :
American Water Company to begin to offer or furnish :
wastewater service to the public in the Borough of :
Kane, and in a portion of Wetmore Township, McKean :
County, Pennsylvania :

Docket No. A-2019-3014248, *et al.*

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Correspondence filing 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

Sharon E. Webb, Esq. (PA ID 73995)
Daniel G. Asmus, Esq. (PA ID 83789)
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
Counsel for *Office of Small Business Advocate*
swebb@pa.gov
dasmus@pa.gov

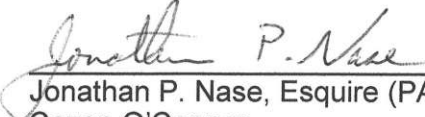
Christine Maloni Hoover, Esq. (PA ID 50026)
Erin L. Gannon, Esq. (PA ID 83487)
Harrison W. Breitman, Esq. (PA ID 320580)
Santo G. Spataro, Esq. (PA ID 327494)
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
Counsel for *Office of Consumer Advocate*
CHoover@paoca.org
EGannon@paoca.org
SSpataro@paoca.org
HBreitman@paoca.org

Carrie B. Wright, Esq. (PA ID 208185)
Erika L. McLain, Esq. (PA ID 320526)
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
P.O. Box 3265
Harrisburg, PA 17105-3265
Counsel for *Bureau of Investigation & Enforcement*
carwright@pa.gov
ermclain@pa.gov

Carl R. Shultz, Esq. (PA ID 70328)
Eckert Seamans Cherin & Mellot, LLC
213 Market St., 8th Floor
Harrisburg, PA 17101
Counsel for *Kane Borough Authority*
cshultz@eckertseamans.com

Elizabeth Rose Triscari, Esq.
852 Wesley Drive
Mechanicsburg, PA 17055
Counsel for *Pennsylvania-American Water Company*
elizabeth.triscari@amwater.com

Respectfully submitted,


Jonathan P. Nase, Esquire (PA ID 44003)
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
(717) 703-5892
jnase@cozen.com

Date: March 2, 2020

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Pennsylvania-American Water :
Company under Section 1102(a) of the Pennsylvania :
Public Utility Code, 66 Pa C.S. § 1102(a), for approval :
of (1) the transfer, by sale, of substantially all of the :
Borough of Kane Authority’s assets, properties and :
rights related to its wastewater collection and treatment :
system to Pennsylvania-American Water Company, and :
(2) the rights of Pennsylvania-American Water :
Company to begin to offer or furnish wastewater service :
to the public in the Borough of Kane, and in a portion of :
Wetmore Township, McKean County, Pennsylvania. :

Docket No. A-2019-3014248,
et al.

**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 Office of Consumer Advocate (“OCA”), the Office of Small Business Advocate, and Kane Borough (the “Borough”) (collectively, the “Parties”) stipulate to the following modifications of the Commission’s Rules of Administrative Practice and Procedure regarding discovery:

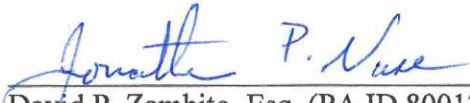
Discovery Rule Modifications

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 (5) calendar days.
6. Requests for admissions will be deemed admitted unless answered 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 purposes 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 14th day of February, 2020.



David P. Zambito, Esq. (PA ID 80017)
Jonathan P. Nase, Esq. (PA ID 44003)
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
Counsel for *Pennsylvania-American Water Company*



Carrie B. Wright, Esq. (PA ID 208185)
Erika L. McLain, Esq. (PA ID 320526)
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor West
P.O. Box 3265
Harrisburg, PA 17105-3265
Counsel for *Bureau of Investigation & Enforcement*

Christine Maloni Hoover, Esq. (PA ID 50026)
Erin L. Gannon, Esq. (PA ID 83487)
Harrison W. Breitman, Esq. (PA ID 320580)
Santo G. Spataro, Esq. (PA ID 327494)
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
Counsel for *Office of Consumer Advocate*

Sharon E. Webb, Esq. (PA ID 73995)
Daniel G. Asmus, Esq. (PA ID 83789)
Office of Small Business Advocate
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
Counsel for *Office of Small Business Advocate*

Carl R. Shultz, Esq. (PA ID 70328)
Eckert Seamans
213 Market St., 8th Floor
Harrisburg, PA 17101
Counsel for *Kane Borough*

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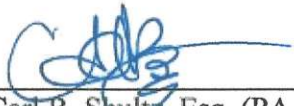
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