



March 23, 2020

**VIA E-MAIL**

**Jonathan P. Nase**

Direct Phone 717-773-4191

Direct Fax 215-372-2340

[jnase@cozen.com](mailto:jnase@cozen.com)

Harrison Breitman, Esq.  
Assistant Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street, Fifth Floor, Forum Place  
Harrisburg, PA 17101-1923

**Re: Application of Pennsylvania-American Water Company Pursuant to Sections 507, 1102 and 1329 of the Public Utility Code for Approval of its Acquisition of the Wastewater System Assets of Kane Borough Authority, Docket No. A-2019-3014248**

**Pennsylvania-American Water Company's Answers to the Interrogatories of the Office of Consumer Advocate, Set V**

Dear Mr. Breitman:

Enclosed please find the above-referenced responses to interrogatories. Copies have been served as indicated on the enclosed certificate of service.

Please contact me should you have any question concerning the enclosed.

Sincerely,

COZEN O'CONNOR

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

JPN  
Enclosures

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service Only*)  
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 : Docket No. A-2019-3014248, *et al.*  
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 :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing **Pennsylvania-American Water Company's Answers to the Interrogatories of the Office of Consumer Advocate, Set V**, upon the parties, listed below in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

**DUE TO THE COVID-19 EMERGENCY, THIS DOCUMENT IS BEING SERVED BY E-MAIL ONLY**

Sharon E. Webb, Esq. (PA ID 73995)  
Daniel G. Asmus, Esq. (PA ID 83789)  
Office of Small Business Advocate  
555 Walnut Street, 1<sup>st</sup> 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, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
Counsel for *Office of Consumer Advocate*  
CHoover@paoca.org  
EGannon@paoca.org  
SSpataro@paoca.org  
HBreitman@paoca.org

Brian Kalcic  
Excel Consulting  
225 S. Meramec Avenue, Suite 720  
St. Louis, MO 63105  
excel.consulting@sbcglobal.net

Ralph C. Smith  
Larkin & Associates, PLLC  
15728 Farmington Road  
Livonia, MI 48514  
OCAKane@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, 2<sup>nd</sup> 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 & Mellott, LLC  
213 Market St., 8<sup>th</sup> 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

Counsel for *Pennsylvania-American Water Company*

Date: March 23, 2020