



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

November 9, 2020

**Via Electronic Mail**

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

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 Royersford Borough  
Docket No.: A-2020-3019634  
**I&E Interrogatories**

Dear Counsel:

Enclosed please find the following Bureau of Investigation and Enforcement's (I&E) **Interrogatories** for the above-captioned proceeding:

- **I&E Set I (nos. 1-9) – Patel**
- **I&E Set II (nos. 1-4) – Cline**

Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

Pursuant to the Prehearing Conference Order issued on November 4 in this proceeding, responses to Interrogatories are due within seven (7) calendar days of service. However, I&E would appreciate best efforts to serve responses within five (5) calendar days. Please provide your responses and forward them via email to [ermclain@pa.gov](mailto:ermclain@pa.gov) and [jcoogan@pa.gov](mailto:jcoogan@pa.gov).

Copies are being served on parties of record per the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic service.* Should you have any questions, please do not hesitate to contact the undersigned.

Sincerely,

John M. Coogan  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 313920

Erika L. McLain  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 320526

JMC/ac  
Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter and Certificate of Service only – via e-file*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania-American Water :  
Company Pursuant to Sections 507, 1102 and :  
1329 of the Public Utility Code for Approval : Docket No.: A-2020-3019634  
of its Acquisition of the Wastewater System :  
Assets of Royersford Borough :

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Interrogatories** dated November 9, 2020, in the manner and upon the persons listed below.

**Served via Electronic Mail Only**

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