

November 16, 2020

Jonathan P. Nase Direct Phone 717-773-4191 Direct Fax 215-372-2340 jnase@cozen.com

VIA E-MAIL

Santo G. Spataro, Esq. Office of Consumer Advocate 555 Walnut Street, 5th Floor Harrisburg, PA 17101-1923

Re: Section 1329 Application of Pennsylvania-American Water Company-Wastewater Division for the Acquisition of Royersford Borough's Wastewater System Assets; Docket No. A-2020-3019634

Pennsylvania-American Water Company's Responses to Interrogatories of the Office of Consumer Advocate, Set I

Dear Santo:

Enclosed please find Pennsylvania-American Water Company's responses to the abovereferenced discovery. Copies have been served as shown on the enclosed certificate of service.

Please contact me if you have any questions regarding the enclosed documents.

Sincerely,

COZEN O'CONNOR

the P. Nase

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

JPN

cc: Per Certificate of Service Rosemary Chiavetta, Secretary (*cover letter and certificate of service only*) Elizabeth Triscari, Esq.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Application of Pennsylvania-American Water : Company-Wastewater Division under Section 1329 of : the Pennsylvania Public Utility Code, 66 Pa. C.S. : § 1329, for the Acquisition of Royersford Borough's : Wastewater System Assets :

Docket No. A-2020-3019634

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing Answers of **Pennsylvania-American Water Company to the Interrogatories of the Office of Consumer Advocate – Set I,** 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) Office of Small Business Advocate 555 Walnut Street, 1st Floor Harrisburg, PA 17101 Counsel for *Office of Small Business Advocate* swebb@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 BSpataro@paoca.org HBreitman@paoca.org Brian Kalcic Excel Consulting 225 S. Meramec Avenue, Suite 720 St. Louis, MO 63105 excel.consulting@sbcglobal.net Consultant for *Office of Small Business Advocate*

David J. Garrett Resolve Utility Consulting 101 Park Avenue Suite 1125 Oklahoma City, OK 73102 OCAPAWCRoyersford@paoca.org Consultant for *Office of Consumer Advocate*

Erika L. McLain, Esq. (PA ID 320526) John M. Coogan, Esq. (PA ID 313920) 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 Respectfully submitted,

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Jonathan P. Nase, Esq. (PA ID 44003) Cozen O'Connor 17 North Second Street, Suite 1410 Harrisburg, PA 17101 (717) 773-4191 jnase@cozen.com Counsel for *Pennsylvania-American Water Company*

Date: November 16, 2020