



November 16, 2020

VIA E-MAIL

Jonathan P. Nase

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

John M. Coogan, Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
Harrisburg, PA 17120

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 Bureau of Investigation and Enforcement, Set I

Dear Mr. Coogan:

Enclosed please find Pennsylvania-American Water Company's responses to the above-referenced 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

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. : Docket No. A-2020-3019634
§ 1329, for the Acquisition of Royersford Borough's :
Wastewater System Assets :

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 Bureau of Investigation and Enforcement – 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
SSpataro@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,

A handwritten signature in blue ink that reads "Jonathan P. Nase".

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