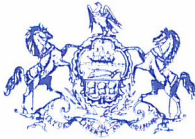


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560



FAX (717) 783-7152  
consumer@paoca.org

December 8, 2020

**Via Electronic Mail Only**

David P. Zambito, Esquire  
Jonathan P. Nase, Esquire  
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

Dear Counsel:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set II, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquires within twenty (20) days of service. The OCA would appreciate your efforts to meet the modified discovery response deadlines that have been used in prior Applications filed pursuant to Sections 1102 and 1329 of the Public Utility Code. Please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Noah D. Eastman  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
E-Mail: [OCAPAWCRoyersford@paoca.org](mailto:OCAPAWCRoyersford@paoca.org)

David P. Zambito, Esquire  
Jonathan P. Nase, Esquire  
December 8, 2020  
Page 2

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,

/s/ Santo G. Spataro  
Santo G. Spataro  
Assistant Consumer Advocate  
PA Attorney I.D. # 327494  
E-Mail: [SSpataro@paoca.org](mailto:SSpataro@paoca.org)

Enclosures:

cc: PUC Secretary Rosemary Chiavetta (Letter and Certificate of Service only)  
Certificate of Service

\*300490

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Pennsylvania-American Water Company, Set II, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 8<sup>th</sup> day of December 2020.

**SERVICE BY E-MAIL ONLY**

Erika L. McLain, Esquire  
John M. Coogan, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Sharon E. Webb, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

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

Elizabeth Rose Triscari, Esquire  
Director, Corporate Counsel  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055

Thomas Wyatt, Esquire  
Matthew S. Olesh, Esquire  
Sydney N. Melillo, Esquire  
Obermayer Rebmann Maxwell & Hippel, LLP  
Centre Square West  
1500 Market Street, Suite 3400  
Philadelphia, PA 19102

Robert Redinger, Jr.  
1881 Painters Run Road  
Pittsburgh, PA 15241

/s/ Santo G. Spataro  
Santo G. Spataro  
Assistant Consumer Advocate  
PA Attorney I.D. # 327494  
E-Mail: [SSpataro@paoca.org](mailto:SSpataro@paoca.org)

Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

Erin L. Gannon  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 83487  
E-Mail: [EGannon@paoca.org](mailto:EGannon@paoca.org)

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
E-Mail: [HBreitman@paoca.org](mailto:HBreitman@paoca.org)

Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: December 8, 2020  
\*300491