



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

December 22, 2020

**Via Electronic Mail**

Honorable Marta Guhl  
Office of Administrative Law Judge  
Pennsylvania Public Utility Commission  
801 Market Street, Suite 4063  
Philadelphia, PA 19107

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 Direct Testimony and Exhibit**

Your Honor:

Enclosed please find copies of the following prepared **Direct Testimony and Exhibit** of the Bureau of Investigation and Enforcement's (I&E) witnesses:

D. C. Patel	I&E Statement No. 1;	I&E Exhibit No. 1
Ethan H. Cline	I&E Statement No. 2	

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 [ermclain@pa.gov](mailto:ermclain@pa.gov) and [jcoogan@pa.gov](mailto:jcoogan@pa.gov).

Sincerely,

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

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

ELM/JMC/ac  
Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter and Certificate of Service only – via e-file*)  
Pamela McNeal, Legal Assistant – OALJ, PUC (*via electronic mail*)  
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 **Direct Testimony and Exhibit** dated  
December 22, 2020, in the manner and upon the persons listed below:

**Served via Electronic Mail Only**

Honorable Marta Guhl  
Pamela McNeal, Legal Assistant  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
801 Market Street  
Suite 4063  
Philadelphia, PA 19107  
[mguhl@pa.gov](mailto:mguhl@pa.gov)  
[pmcneal@pa.gov](mailto:pmcneal@pa.gov)

Elizabeth Rose Triscari, Esq.  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
[elizabeth.triscari@amwater.com](mailto:elizabeth.triscari@amwater.com)  
*Counsel for  
Pennsylvania-American Water Company*

David P. Zambito, Esq.  
Jonathan P. Nase, Esq.  
Cozen O'Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101  
[dzambito@cozen.com](mailto:dzambito@cozen.com)  
[jnase@cozen.com](mailto:jnase@cozen.com)  
*Counsel for  
Pennsylvania-American Water Company*

Thomas Wyatt, Esq.  
Matthew S. Olesh, Esq.  
Sydney N. Melillo, Esq.  
Obermayer Rebmann Maxwell & Hippell LLP  
Centre Square West  
1500 Market Street, Suite 3400  
Philadelphia, PA 19102  
[thomas.wyatt@obermayer.com](mailto:thomas.wyatt@obermayer.com)  
[matthew.olesh@obermayer.com](mailto:matthew.olesh@obermayer.com)  
[sydney.melillo@obermayer.com](mailto:sydney.melillo@obermayer.com)  
*Counsel for Borough of Royersford*

Sharon E. Webb, Esq.  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101-1923  
[swebb@pa.gov](mailto:swebb@pa.gov)

Christine Maloni Hoover, Esq.  
Erin L. Gannon, Esq.  
Harrison W. Breitman, Esq.  
Santo G. Spataro, Esq.  
Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101-1923  
[ocapawcRoyersford@paoca.org](mailto:ocapawcRoyersford@paoca.org)

Noah D. Eastman, Regulatory Analyst  
Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101-1923  
[Neastman@paoca.org](mailto:Neastman@paoca.org)  
*Consultant for OCA*

David J. Garrett  
Resolve Utility Consulting  
101 Park Avenue  
Suite 1125  
Oklahoma City, OK 73102  
[ocapawcRoyersford@paoca.org](mailto:ocapawcRoyersford@paoca.org)  
*Consultant for OCA*

Brian Kalcic  
Excel Consulting  
225 S. Meramec Ave. Suite 720  
St. Louis, MO 63105  
[excel.consulting@sbcglobal.net](mailto:excel.consulting@sbcglobal.net)  
*Consultant for OSBA*

Robert Redinger, Jr.  
1881 Painters Run Road  
Pittsburgh, PA 15214  
[bobr64@gmail.com](mailto:bobr64@gmail.com)



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