

Matthew S. Olesh 215.665.3043 matthew.olesh@obermayer.com www.obermayer.com

Obermayer Rebmann Maxwell & Hippel LLP

Centre Square West 1500 Market Street | Suite 3400 Philadelphia, PA 19102-2101 P: 215.665.3000

F: 215.665.3165

December 28, 2020

Christine M. Hoover Esq. Erin L. Gannon, Esq. Santo G. Spataro, Esq. Harrison W. Breitman, Esq. Office of Consumer Advocate 555 Walnut Street, 5th Floor Harrisburg, PA 17101-1923

RE: Docket No. A-2020-3019634; 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

Dear Counsel:

Enclosed you will find the Interrogatories of the Royersford Borough, Set I, in the above-referenced proceeding.

In accordance with the Pre-Hearing Order issued on December 16, 2020, we request that the Office of Consumer Advocate provide verified answers to these inquiries within five (5) days of service.

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

Very truly yours,

Matthew S. Olesh

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

CERTIFICATE OF SERVICE

I, Matthew S. Olesh, hereby certify that I have served a true and correct copy of the foregoing Interrogatories and Request for Production of Documents upon the parties listed below in accordance with the requirements of 52 Pa. Code §§ 1.54 (relating to service by a party) via electronic mail.

Elizabeth Rose Triscari Pennsylvania American Water Company 852 Wesley Drive Mechanicsburg, PA 17055 Elizabeth.Triscari@amwater.com

Erika McLain, Esq.
John M. Coogan, Esq.
PUC Bureau Of Investigation And
Enforcement
400 North Street, 2nd Floor West
Harrisburg, PA 17120
ermclain@pa.gov
jcoogan@pa.gov

Christine M. Hoover Esq.
Erin L. Gannon, Esq.
Santo G. Spataro, Esq.
Harrison W. Breitman, Esq.
Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
choover@paoca.org
egannon@paoca.org
sspataro@paoca.org
hbreitman@paoca.org

Sharon E. Webb, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov

Robert Redinger, Jr. 1881 Painters Run Road Pittsburgh, PA 15241 bobr64@gmail.com

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

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

/s/ Matthew S. Olesh Matthew S. Olesh, Esquire

Dated: December 28, 2020