



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

April 14, 2021

Via Electronic Mail

Elizabeth Rose Triscari, Esq.
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055

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

Re: Section 1329 Application of Pennsylvania-American Water Company –
Wastewater Division for the Acquisition of Upper Pottsgrove Township's
Wastewater System Assets
Docket No.: A-2020-3021460
I&E Interrogatories

Dear Attorneys Triscari, Zambito and Nase:

Enclosed please the following Bureau of Investigation and Enforcement's (I&E) Interrogatories for the above-captioned proceeding:

I&E Interrogatories Set I (nos. 1-32) – Patel
I&E Interrogatories Set II (nos. 1-7) – Sakaya

Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

Although pursuant to Pa. Code Section 5.342(d), responses to these Interrogatories are due within 20 days of service, please note that either through the agreement of parties, or by motion, I&E will be seeking to shorten this response period to seven (7) days in the near future. I&E's response period proposal is appropriate for this proceeding and the Commission encourages these rule modifications to prevent delay.^[1] Accordingly, and in consideration of the abbreviated timeframe for this proceeding, I&E requests that Pennsylvania-American Water Company provide its responses within seven (7) days. Please provide your responses via email to ginmiller@pa.gov.

^[1] Final Supplemental Implementation Order, Docket No. M-2016-2543193 (Order entered Feb. 28, 2019), p. 51.

Copies are being served on parties 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 me.

Sincerely,

A handwritten signature in black ink, appearing to read "Gina L. Miller". The signature is fluid and cursive, with the first letters of each name being capitalized and prominent.

Gina L. Miller
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 313863
(717) 787-8754
ginmiller@pa.gov

GLM/ac
Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter & Certificate of Service only – via e-file*)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Section 1329 Application of Pennsylvania- :
American Water Company – Wastewater : Docket No.: A-2020-3021460
Division for the Acquisition of Upper :
Pottsgrove Township’s Wastewater System :
Assets :

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatories** dated April 14, 2021, in the manner and upon the person listed below.

Served via Electronic Mail Only

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