



April 21, 2021

VIA ELECTRONIC MAIL

Gina Miller, Prosecutor
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Elizabeth Rose Triscari

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In Re: Application of Pennsylvania-American Water Company under Section 1102(a) of the Pennsylvania Public Utility Code, 66 Pa C.S. § 1102(a), for approval of (1) the transfer, by sale, of substantially all of Upper Pottsgrove Township's assets, properties and rights related to its wastewater collection and conveyance system to Pennsylvania-American Water Company, and (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in Upper Pottsgrove Township, Montgomery County and a portion of Douglass Township, Berks County, Pennsylvania - Docket No. A-2020-3021460, et al

Dear Counsel:

Attached please find Pennsylvania-American Water Company's Responses to Set I and II Interrogatories propounded by the Bureau of Investigation and Enforcement. Please note that Attachment I&E-I-22 is **CONFIDENTIAL** and should be treated as such pursuant to the Stipulated Protective Agreement.

If you should have any questions, please feel free to contact me.

Sincerely,

Elizabeth Rose Triscari

cc: Rosemary Chiavetta, Secretary (*cover letter and Certificate of Service only*)
All Parties of Record (*via electronic mail*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Pennsylvania-American Water Company :
under Section 1102(a) of the Pennsylvania Public Utility Code, 66 :
Pa C.S. § 1102(a), for approval of (1) the transfer, by sale, of :
substantially all of Upper Pottsgrove’s assets, properties and :
rights related to its wastewater collection and conveyance system : Docket No. A-2020-3021460
to Pennsylvania-American Water Company, and (2) the rights of :
Pennsylvania-American Water Company to begin to offer or :
furnish wastewater service to the public in Upper Pottsgrove :
Township, Montgomery County and a portion of Douglass :
Township, Berks County. :

In re: Application of Pennsylvania-American Water Company :
under Section 1329 of the Pennsylvania Public Utility Code, 66 :
Pa. C.S. § 1329, for approval of the use for ratemaking purposes : Docket No. A-2020-_____
of the lesser of the fair market value or the negotiated purchase :
price of Upper Pottsgrove Township’s assets related to its :
wastewater collection system. :

Petition of Pennsylvania-American Water Company, related to its :
acquisition of the Upper Pottsgrove Township wastewater :
collection system, for approval under Section 1329 of the :
Pennsylvania Public Utility Code, 66 Pa. C.S. § 1329, to (i) collect :
a distribution system improvement charge, (ii) for book and : Docket No. P-2020-_____
ratemaking purposes, accrue Allowance for Funds Used During :
Construction for post-acquisition improvements not recovered :
through the distribution system improvement charge, (iii) for book :
and ratemaking purposes, defer depreciation related to post- :
acquisition improvements not recovered through the distribution :
system improvement charge, and (iv) include, in its next base rate :
case, a claim for transaction and closing costs. :

In re: Filing by Pennsylvania-American Water Company under :
Section 507 of the Pennsylvania Public Utility Code, 66 Pa. C.S. : Docket No U-2020-_____
§ 507, of (a) the Asset Purchase Agreement Between :
Pennsylvania-American Water Company and Upper Pottsgrove :
Township; (b) the Sewage Treatment Agreement between Upper :
Pottsgrove Township, Borough of Pottsgrove and Pottstown :
Borough Authority and (c) Joint Sewage Transportation :
Agreement between Upper Pottsgrove Township and Lower :
Pottsgrove Township :

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of April, served a true copy of the foregoing filing 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

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Respectfully submitted,



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