



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

June 3, 2021

**Via Electronic Mail**

Honorable Jeffrey A. Watson  
Pennsylvania Public Utility Commission  
Office of Administrative Law Judge  
301 Fifth Avenue, Suite 220  
Pittsburgh, PA 15222

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 Letter in Lieu of Rebuttal Testimony**

Your Honor:

Please allow this letter to serve as formal notice that the Bureau of Investigation and Enforcement (“I&E”) will not be serving rebuttal testimony in response to the direct testimony of either Pottstown Borough Authority/Borough of Pottstown (collectively “PBA”) or to Shadeland Development Company (Shadeland”). However, I&E recognizes that PBA and Shadeland’s direct testimony raise contract and/or property interest claims that are currently disputed by Upper Pottsgrove Township. In I&E’s view, the interests alleged require legal interpretation that are not properly the subject of I&E’s testimony. Instead, I&E reserves the right to address these matters in the briefing phase of this case, if deemed necessary.

Copies of this letter 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,

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GLM/ac  
Enclosure

cc: Rosemary Chiavetta, Secretary (*via e-file*)  
Nick Miskanic, Legal Assistant – Office of Administrative Law Judge (*via email*)  
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 **Letter** dated June 3, 2021, in the manner and upon the person listed below:

**Served via Electronic Mail Only**

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