

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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FAX (717) 783-7152  
consumer@paoca.org

July 23, 2021

**Via Electronic Mail Only**

Susan Simms Marsh, Esquire  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055

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 York City Sewer Authority  
Docket No. A-2021-3024681

Dear Ms. Marsh:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set I, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquires within twenty (20) days of service. The OCA would appreciate your efforts to meet the modified discovery response deadlines that have been used in prior Applications filed pursuant to Sections 1102 and 1329 of the Public Utility Code. Please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultant, as listed below:

Ralph C. Smith  
Larkin & Associates, PLLC  
15728 Farmington Road  
Livonia, MI 48154  
E-Mail: [OCAPAWCYork@paoca.org](mailto:OCAPAWCYork@paoca.org)

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

Sincerely,

/s/ Harrison W. Breitman  
Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
E-Mail: [HBreitman@paoca.org](mailto:HBreitman@paoca.org)

Enclosures:

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

\*314068

CERTIFICATE OF SERVICE

Re: Application of Pennsylvania-American Water :  
Company Pursuant to Sections 507, 1102 and 1329 :  
of the Public Utility Code for Approval of its : Docket No. A-2021-3024681  
Acquisition of the Wastewater System Assets of :  
York City Sewer Authority :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Pennsylvania-American Water Company, Set I, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 23<sup>rd</sup> day of July 2021.

**SERVICE BY E-MAIL ONLY**

Carrie B. Wright, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Erin K. Fure, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

Thomas Wyatt, Esquire  
Matthew S. Olesh, Esquire  
Sydney N. Melillo, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
Centre Square West  
1500 Market Street, Suite 3400  
Philadelphia, PA 19102

Susan Simms Marsh, Esquire  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055

/s/ Harrison W. Breitman  
Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
E-Mail: [HBreitman@paoca.org](mailto:HBreitman@paoca.org)

Counsel for:  
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Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: July 23, 2021  
\*314072

Erin L. Gannon  
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