



Susan Simms Marsh
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November 15, 2021

VIA ELECTRONIC MAIL

Carrie B. Wright, Prosecutor
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: 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, to Pennsylvania-American Water Company, of substantially all of the assets, properties and rights related to the wastewater collection and treatment system owned by the York City Sewer Authority and operated by the City of York, (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the City of York, Pennsylvania, and to three bulk service interconnection points located in North York Borough, Manchester Township and York Township, York County, Pennsylvania, and (3) the rights of Pennsylvania-American Water Company to begin to offer and furnish Industrial Pretreatment Program to qualifying industrial customers in Manchester Township, Spring Garden Township and West Manchester Township, York County, Pennsylvania - Docket No. A-2021-3024681, et al

Dear Ms. Wright:

Attached please find Pennsylvania-American Water Company's ("PAWC") Responses to the Interrogatories of the Bureau of Investigation and Enforcement ("I&E") Set I. Please note that PAWC will provide the outstanding responses to I&E when they become available.



Furthermore, please note that some of the responses are **CONFIDENTIAL** and will be provided to those individuals who have executed the Protective Agreement. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Susan Simms Marsh". The signature is written in a cursive, flowing style.

Susan Simms Marsh

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only*)
All Parties on the Attached Certificate of Service (*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, to Pennsylvania-American Water :
Company, of substantially all of the assets, properties and :
rights related to the wastewater collection and treatment :
system owned by the York City Sewer Authority and : Docket No. A-2021-3024681
operated by the City of York, (2) the rights of :
Pennsylvania-American Water Company to begin to offer :
or furnish wastewater service to the public in the City of :
York, Pennsylvania, and to three bulk service :
interconnection points located in North York Borough, :
Manchester Township and York Township, York :
County, Pennsylvania, and (3) the rights of Pennsylvania- :
American Water Company to begin to offer and furnish :
Industrial Pretreatment Program to qualifying industrial :
customers in Manchester Township, Spring Garden :
Township and West Manchester Township, York County, :
Pennsylvania. :

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 of the lesser of the fair market : Docket No. A-2021-_____
value or the negotiated purchase price of the assets related :
to the wastewater collection and treatment system owned :
by the York City Sewer Authority and operated by the :
City of York. :

In re: Petition of Pennsylvania-American Water :
Company, related to is acquisition of the wastewater :
collection and treatment system owned by the York City :
Sewer Authority and operated by the City of York, for : Docket No. P-2021-_____
approval under Section 1329 of the Pennsylvania Public :
Utility Code, 66 Pa. C.S. § 1329, to (i) for book and :
ratemaking purposes, accrue Allowance for Funds Used :
During Construction for post-acquisition improvements :
not recovered through the distribution system :
improvement charge, (ii) for book and ratemaking :
purposes, defer depreciation related to post-acquisition :
improvements not recovered through the distribution :
system improvement charge, and (iii) 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. § 507, of (i) the Asset Purchase :
Agreement By and Among York City Sewer Authority, : Docket Nos. U-2021-_____, *et al.*
the City of York, and Pennsylvania-American Water :
Company, and (ii) Six agreements with municipal :
corporations to be assumed by Pennsylvania-American :
Water Company upon closing of its acquisition of :
substantially all of the assets related to the wastewater :
collection and treatment system owned by the York City :
Sewer Authority and operated by the City of York. :

In re: Petition of Pennsylvania-American Water :
Company under Section 508 of the Pennsylvania Public :
Utility Code, 66 Pa C.S. § 508, to modify seven :
agreements with a corporation and municipal : Docket No. P-2021-_____
corporations to be assumed by Pennsylvania-American :
Water Company upon closing of its acquisition of :
substantially all of the assets related to the wastewater :
collection and treatment system owned by the York City :
Sewer Authority and operated by the City of York. :

CERTIFICATE OF SERVICE

I hereby certify that I have this 15th day of November served a true copy of the foregoing responses 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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