

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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December 10, 2021

**Via Electronic Mail Only**

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

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 Counsel:

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

In accordance with the Commission's Rules of Practice and Procedure as modified by the Presiding Officer in the Prehearing Order issued November 22, 2021, we request that the Company provide verified answers to these inquires within five (5) days of service. 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)

David P. Zambito, Esquire  
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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/ Erin L. Gannon  
Erin L. Gannon  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 83487  
E-Mail: [EGannon@paoca.org](mailto:EGannon@paoca.org)

Enclosures:

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

\*320911

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 (PAWC), Set III, 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 10<sup>th</sup> day of December 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  
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*Counsel for the City of York*

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**SERVICE BY E-MAIL ONLY (continued)**

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/s/ Erin L. Gannon  
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Dated: December 10, 2021  
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