

17 North Second Street 12th Floor Harrisburg, PA 17101-1601 717-731-1970 Main 717-731-1985 Main Fax www.postschell.com

Devin Ryan

dryan@postschell.com 717-612-6052 Direct 717-731-1985 Direct Fax

December 10, 2021

VIA EMAIL (SUSAN.MARSH@AMWATER.COM; DZAMBITO@COZEN.COM; JNASE@COZEN.COM)

Susan Simms Marsh, Esquire PA American Water Company 852 Wesley Drive Mechanicsburg, PA 17055 David P. Zambito, Esquire Jonathan Nase, Esquire Cozen O'Connor 17 North Secod Street, Suite 1410 Harrisburg, PA 17101

Re: Application of Pennsylvania American Water Company - Wastewater Division (PAWC-WD), under Sections 1102(a) and 1329 of the Pennsylvania Public Utility Code, 66 Pa. C.S. §§ 1102(a) and 1329 (relating to enumeration of acts requiring certificate and valuation of acquired water and wastewater systems), for approval of: (1) the transfer, by sale, of substantially all of the wastewater system assets, properties and rights related to the wastewater collection and treatment system owned by York City Sewer Authority and operated by the City of York; (2) the right of PAWD-WD 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 right of PAWC-WD 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

Ms. Marsh:

Enclosed are the Interrogatories and Requests for Production of Documents Propounded by The York Water Company on Pennsylvania-American Water Company – Set I in the above-referenced proceeding.

Copies will be provided as indicated on the Certificate of Service.

Please provide answers to the enclosed discovery within five (5) days of the date of service, pursuant to the Prehearing Conference Order.

Susan Simms Marsh, Esquire David P. Zambito, Esquire December 10, 2021 Page 2

Respectfully submitted,

Devin Ryan

DTR/dmc Enclosures

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

Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL ONLY

Erin L. Gannon, Esquire Harrison Breitman, Esquire Office of Consumer Advocate 555 Walnut Street, 5th Floor Harrisburg, PA 17101-1923 egannon@paoca.org hbreitman@paoca.org

Carrie B. Wright, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
P.O. Box 3265
Harrisburg, PA 17105-3265
carwright@pa.gov

Erin Fure, Esquire Office of Small Business Advocate 555 Walnut Street, 1st Floor Harrisburg, PA 17101 efure@pa.gov

Susan Simms Marsh, Esquire PA American Water Company 852 Wesley Drive Mechanicsburg, PA 17055 Susan.marsh@amwater.com

Adeolu A. Bakare, Esquire Vasiliki Karandrikas, Esquire Jo-Anne Thompson, Esquire McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 abakare@mcneeslaw.com vkarandrikas@mcneeslaw.com jthompson@mcneeslaw.com David P. Zambito, Esquire
Jonathan Nase, Esquire
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
dzambito@cozen.com
jnase@cozen.com

Thomas Niesen, Esquire Thomas, Niesen & Thomas LLC 212 Locust Street, Suite 302 Harrisburg, PA 17101 tniesen@tntlawfirm.com

Stacey R. MacNeal, Esquire Barley Snyder 100 East Market Street York, PA 17401 smacneal@barley.com

Matthew Olesh, Esquire
Obermayer Rebmann Maxwell & Hippel
LLP
1500 Market Street, Suite 3400
Centre Square West
Philadelphia, PA 19102
Matthew.olesh@obermayer.com

VIA FIRST CLASS MAIL ONLY

Gary Lehman 335 Pattison Street York, PA 17403-2415

Date: December 10, 2021

Devin T. Ryan