



December 13, 2021

VIA E-MAIL AND FIRST CLASS MAIL

Jonathan P. Nase
Direct Phone 717-773-4191
Direct Fax 215-372-2340
jnase@cozen.com

Devin Ryan, Esq.
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601

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 Nos. A-2021-3024681, et al

Pennsylvania-American Water Company's Objections to Certain Interrogatories and Requests for Production of Documents Propounded by The York Water Company

Dear Mr. Ryan:

As we discussed earlier today, Pennsylvania-American Water Company objects to The York Water Company's Interrogatories and Requests for Production of Documents 2, 3, 4 (d, e and g), 5 (c and d), 6 (b), 7(d) and 8(c). Written objections are enclosed. Copies are being served as shown on the enclosed certificate of service.

Please contact me if you have any question or concern. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR

By: Jonathan P. Nase
Counsel for *Pennsylvania-American Water Company*

JPN:kmg
Enclosure

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service Only*)
Per Certificate of Service
Susan Simms Marsh, Esq.

**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 : Docket No. A-2021-3024681, *et*
assets, properties and rights related to the wastewater collection and : *al.*
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 :

CERTIFICATE OF SERVICE

I hereby certify that I have this 13th day of December, 2021 served a true copy of the foregoing **Pennsylvania-American Water Company's Objections to Certain Interrogatories and Requests for Production of Documents Propounded by The York Water Company** upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND FIRST CLASS MAIL

Erin K. Fure, Esq.
Office of Small Business Advocate
555 Walnut St.
Forum Place, First Floor
Harrisburg, PA 17101-1923
efure@pa.gov
Counsel for *Office of Small Business Advocate*

Carrie B. Wright, Esq.
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
400 North Street, F West
Harrisburg, PA 17120
carwright@pa.gov
Counsel for *Bureau of Investigation and Enforcement*

Harrison W. Breitman, Esq.
Erin L. Gannon, Esq.
Office of Consumer Advocate
555 Walnut Street
Forum Place, Fifth Floor
Harrisburg, PA 17101-1923
HBreitman@paoca.org
EGannon@paoca.org
Counsel for *Office of Consumer Advocate*

Adeolu A. Bakare, Esq.
Vasiliki Karandrikas, Esq.
McNees, Wallace & Nurick
100 Pine Street
Harrisburg, PA 17101
ABakare@mcneeslaw.com
VKarandrikas@mcneeslaw.com
Counsel for *City of York*

Thomas T. Niesen, Esq.
Thomas, Niesen and Thomas
212 Locust Street, Suite 302
Harrisburg, PA 17101
tniesen@tntlawfirm.com
Counsel for *York City Sewer Authority*

Stacey R. MacNeal, Esq.
Barley Snyder
100 East Market Street
York, PA 17401
smacneal@barley.com
Counsel for *York City Sewer Authority*

Michael W. Hassell, Esq.
Devin T. Ryan, Esq.
Post & Schell, P.C.
17 North Second St., 12th Floor
Harrisburg, PA 17101-1601
mhassell@postschell.com
dryan@postschell.com
Counsel for *The York Water Company*



Jonathan P. Nase, Esq.
Counsel for *Pennsylvania-American Water Company*