



**Susan Simms Marsh**  
*Deputy General Counsel*  
Pennsylvania-American Water Company  
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December 15, 2021

**VIA ELECTRONIC MAIL**

Devin T. Ryan, Esquire  
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 No. A-2021-3024681, et al**

Dear Mr. Ryan:

Please find Pennsylvania-American Water Company's Responses to Set I Interrogatories by York Water Company.



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 style.

Susan Simms Marsh

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only*)  
Ralph C. Smith (*on behalf of the Office of Consumer Advocate*) (*via electronic mail*)  
Brian Kalcic (*on behalf of the Office of Small Business Advocate*) (*via electronic mail*)  
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 15<sup>th</sup> day of December 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**

Erin K. Fure, Esquire  
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Gary Lehman  
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(via first-class mail)

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Respectfully Submitted,



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