

December 21, 2021

Jonathan P. Nase

Direct Phone 717-773-4191 Direct Fax 215-372-2340

jnase@cozen.com

VIA E-MAIL AND FIRST CLASS MAIL

Carrie B. Wright, Esq. Bureau of Investigation and Enforcement Pennsylvania Public Utility Commission 400 North Street, F West 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 Nos. A-2021-3024681, et al

Interrogatories and Requests for Production of Documents Propounded by Pennsylvania-American Water Company on the Bureau of Investigation and Enforcement – Set I

Dear Ms. Wright:

Enclosed please find the Interrogatories and Requests for Production of Documents Propounded by Pennsylvania-American Water Company on the Bureau of Investigation and Enforcement – Set I. Based on the ALJ's discovery rule modifications in this case, verified answers are due in five (5) calendar days. Copies have been served as shown on the attached 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 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.

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of December, 2021 served a true copy of the foregoing Interrogatories and Requests for Production of Documents Propounded by Pennsylvania-American Water Company on the Bureau of Investigation and Enforcement – Set I, 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

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

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*

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*

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

Thomas Wyatt, Esq.
Matthew S. Olesh, Esq.
Sydney Melillo, Esq.
Obermayer Rebmann Maxwell
& Hippel LLP
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19102-2101
Thomas.Wyatt@obermayer.com
Matthew.Olesh@obermayer.com
Sydney.Melillo@obermayer.com
Counsel for Manchester Township, West
Manchester Township, York Water
Company, Spring Garden Township and
North York Borough (aka "Municipalities")

Jonathan P. Nase, Esq.

Jonathan P. Vase

Counsel for Pennsylvania-American Water Company