



December 21, 2021

**VIA E-MAIL AND FIRST CLASS MAIL**

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Harrison W. Breitman, Esq.  
Office of Consumer Advocate  
555 Walnut St.  
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**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 Office of Consumer Advocate – Set I**

Dear Mr. Breitman:

Enclosed please find the Interrogatories and Requests for Production of Documents Propounded by Pennsylvania-American Water Company on the Office of Consumer Advocate – 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 : 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 21<sup>st</sup> 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 Office of Consumer Advocate – Set I**, upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

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Manchester Township, York Water  
Company, Spring Garden Township and  
North York Borough (aka "Municipalities")*



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