

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560

 @pa\_oa

 /pennoca

FAX (717) 783-7152  
consumer@paoca.org

December 29, 2021

**Via Electronic Mail Only**

David P. Zambito, Esquire  
Jonathan P. Nase, Esquire  
Cozen O'Connor  
17 North Second Street  
Suite 1410  
Harrisburg, PA 17101

Re: Application of Pennsylvania-American Water  
Company Pursuant to Sections 507, 1102 and  
1329 of the Public Utility Code for Approval  
of its Acquisition of the Wastewater System  
Assets of York City Sewer Authority  
Docket No. A-2021-3024681

Dear Counsel:

Enclosed please find the Office of Consumer Advocate's Responses to Pennsylvania-American Water Company's (PAWC) Interrogatories, Set I Nos. 1 through 3, in the above-referenced proceeding.

Copies of the responses have been served as indicated on the enclosed Certificate of Service.

Respectfully submitted,

/s/ Harrison W. Breitman  
Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
E-Mail: HBreitman@paoca.org

Enclosures:

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

\*321497

CERTIFICATE OF SERVICE

Re: Application of Pennsylvania-American Water :  
Company Pursuant to Sections 507, 1102 and 1329 :  
of the Public Utility Code for Approval of its : Docket No. A-2021-3024681  
Acquisition of the Wastewater System Assets of :  
York City Sewer Authority :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Responses to Pennsylvania-American Water Company (PAWC), Set I Nos. 1 through 3, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 29<sup>th</sup> day of December 2021.

**SERVICE BY E-MAIL ONLY**

Carrie B. Wright, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120  
[carwright@pa.gov](mailto:carwright@pa.gov)

Erin K. Fure, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[efure@pa.gov](mailto:efure@pa.gov)

Thomas Wyatt, Esquire  
Matthew S. Olesh, Esquire  
Sydney N. Melillo, Esquire  
Obermayer Rebmann Maxwell & Hippel LLP  
Centre Square West  
1500 Market Street, Suite 3400  
Philadelphia, PA 19102  
[thomas.wyatt@obermayer.com](mailto:thomas.wyatt@obermayer.com)  
[matthew.olesh@obermayer.com](mailto:matthew.olesh@obermayer.com)  
[sydney.melillo@obermayer.com](mailto:sydney.melillo@obermayer.com)  
*Counsel for Manchester, West Manchester,  
Spring Garden and York Townships and  
North York Borough*

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](mailto:abakare@mcneeslaw.com)  
[vkandrikas@mcneeslaw.com](mailto:vkandrikas@mcneeslaw.com)  
[jthompson@mcneeslaw.com](mailto:jthompson@mcneeslaw.com)  
*Counsel for the City of York*

Susan Simms Marsh, Esquire  
Deputy General Counsel  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
[susan.marsh@amwater.com](mailto:susan.marsh@amwater.com)  
*Counsel for PAWC-WD*

David P. Zambito, Esquire  
Jonathan P. Nase, Esquire  
Cozen O’Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101  
[dzambito@cozen.com](mailto:dzambito@cozen.com)  
[jnase@cozen.com](mailto:jnase@cozen.com)  
*Counsel for PAWC-WD*

**SERVICE BY E-MAIL ONLY (continued)**

Thomas T. Niesen, Esquire  
Thomas, Niesen & Thomas, LLC  
212 Locust Street, Suite 302  
Harrisburg, PA 17101  
[tniesen@tntlawfirm.com](mailto:tniesen@tntlawfirm.com)  
*Counsel for York City Sewer Authority*

Stacey R. MacNeal, Esquire  
Barley Snyder  
100 East Market Street  
York, PA 17401  
[smacneal@barley.com](mailto:smacneal@barley.com)  
*Counsel for York City Sewer Authority*

Michael W. Hassell, Esquire  
Devin T. Ryan, Esquire  
Post & Schell, P.C.  
17 North Second Street, 12<sup>th</sup> Floor  
Harrisburg, PA 17101-1601  
[mhassell@postschell.com](mailto:mhassell@postschell.com)  
[dryan@postschell.com](mailto:dryan@postschell.com)  
*Counsel for The York Water Company*

Gary Lehman  
335 Pattison Street  
York, PA 17403-2415  
*(no email address provided)*

/s/ Harrison W. Breitman  
Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
E-Mail: [HBreitman@paoca.org](mailto:HBreitman@paoca.org)

Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

Erin L. Gannon  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 83487  
E-Mail: [EGannon@paoca.org](mailto:EGannon@paoca.org)

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: December 29, 2021  
\*321498