

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO  
Consumer Advocate

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April 12, 2023

**Via Electronic Mail Only**

Elizabeth Rose Triscari, Esquire  
Erin K. Fure, Esquire  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
[elizabeth.triscari@amwater.com](mailto:elizabeth.triscari@amwater.com)  
[erin.fure@amwater.com](mailto:erin.fure@amwater.com)

Re: Application of Pennsylvania-American Water Co.  
under Sections 1102(a) and 1329 of the  
Pennsylvania Public Utility Code to acquire the  
wastewater collection and treatment system  
owned by the Butler Area Sewer Authority and to  
furnish wastewater service to the public in Butler  
County, Pennsylvania  
Docket No. A-2022-3037047

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Sets 1 and 2, in this matter.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within twenty (20) days of service. The OCA would appreciate your efforts to meet the modified discovery response deadlines that have been used in prior Applications filed pursuant to Sections 1102 and 1329 of the Public Utility Code. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

OCA Set 1 and Set 2  
April 12, 2023  
Page 2

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

E-Mail: [OCAPAWCButler@paoca.org](mailto:OCAPAWCButler@paoca.org)

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code § 5.341(b).

Respectfully submitted,

/s/ Mackenzie C. Battle  
Mackenzie C. Battle  
Assistant Consumer Advocate  
PA Attorney I.D. # 330879  
[MBattle@paoca.org](mailto:MBattle@paoca.org)

Enclosures:

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

CERTIFICATE OF SERVICE

Application of Pennsylvania-American Water :  
Co. under Sections 1102(a) and 1329 of the :  
Pennsylvania Public Utility Code to acquire :  
the wastewater collection and treatment : Docket No. A-2022-3037047  
system owned by the Butler Area Sewer :  
Authority and to furnish wastewater service to :  
the public in Butler County, Pennsylvania :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Sets 1 and 2 Interrogatories to PAWC, 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. The cover letter and certificate of service were filed electronically on the Commission's electronic filing system.

Dated this 12<sup>th</sup> day of April 2023.

SERVICE BY E-MAIL ONLY

Erika L. McLain, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
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Assistant Consumer Advocate

Dated: April 12, 2023