



Elizabeth Rose Triscari
Director, Corporate Counsel
852 Wesley Drive | Mechanicsburg, PA 17055
Phone: 717-550-1574 | Fax: 717-550-1255
elizabeth.triscari@amwater.com

August 14, 2023

VIA ELECTRONIC MAIL

Carrie B Wright, Prosecutor
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

In re: Application of Pennsylvania-American Water Company under Section 1102(a) and 1329 of the Pennsylvania Public Utility Code, 66 Pa C.S. §§ 1102(a) and 1329, 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 conveyance system owned by Borough of Brentwood, (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the Borough of Brentwood in Allegheny County, Pennsylvania

Docket No: A-2021-3024058

Dear Counsel:

Attached please find Pennsylvania-American Water Company's Responses to the Set II (excluding I&E-II-1 through 7, 17, 18, 22, 24) Interrogatories propounded by the Bureau of Investigation and Enforcement. Pennsylvania-American Water Company will provide a Response to the outstanding questions when they become available. Please do not hesitate to contact me if you have any questions.

Sincerely,

Elizabeth Rose Triscari

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only*)
All Parties on the Attached Certificate of Service (*via electronic mail*)
Thomas Wyatt, Esquire (*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, of substantially all of Borough of Brentwood's assets, properties and rights related to its wastewater collection and conveyance system to Pennsylvania-American Water Company, and (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the Borough of Brentwood, Allegheny County

Docket No. A-2021-3024058

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 value or the negotiated purchase price of Borough of Brentwood's assets related to its wastewater collection system.

Docket No. A-2023-

Petition of Pennsylvania-American Water Company, related to its acquisition of the Borough of Brentwood wastewater collection system, for approval under Section 1329 of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1329, to (i) collect a distribution system improvement charge, (ii) for book and ratemaking purposes, accrue Allowance for Funds Used During Construction for post-acquisition improvements not recovered through the distribution system improvement charge, (iii) for book and ratemaking purposes, defer depreciation related to post-acquisition improvements not recovered through the distribution system improvement charge, and (iv) include, in its next base rate case, a claim for transaction and closing costs.

Docket No. P-2023-

In re: Filing by Pennsylvania-American Water Company under Section 507 of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 507, of (a) the Asset Purchase Agreement and First Amendment to the Asset Purchase Agreement Between Pennsylvania-American Water Company and Borough of Brentwood; (b) Streets Run Sewer Joint Management Agreement between Boroughs of Brentwood, Baldwin and Whitehall and the Western Mifflin Sanitary Sewer Authority dated July 19, 2000 and (c) Agreement between Borough of Brentwood and City of Pittsburgh dated October 14, 1936 and (d) Cooperation and Allocation of Responsibilities Agreement between Borough of Brentwood and Pennsylvania-American Water Company dated March 2, 2023

Docket Nos. U-2023-_____, *et al.*

CERTIFICATE OF SERVICE

I hereby certify that I have this 14th day of August served a true copy of the foregoing Responses regarding the acquisition of the Borough of Brentwoods's wastewater collection and conveyance system upon the parties, listed below and in the manner below in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

SENT VIA ELECTRONIC MAIL ON AUGUST 14, 2023

Christine Maloni Hoover, Esquire
Aron J. Beatty, Esquire
Andrew J. Zerby, Esquire
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

Sharon Webb, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101

Carrie Wright, Esquire
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
400 North Street, F West
Harrisburg, PA 17120

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue, Suite 720
St. Louis, MO 63105

Respectfully submitted,



Elizabeth Rose Triscari, Esquire (PA ID #306921)
Erin K. Fure, Esquire (PA ID #312245)
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
(717) 550-1574
Email: elizabeth.triscari@amwater.com
erin.fure@amwater.com

David P. Zambito, Esquire (PA ID #80017)
Jonathan P. Nase, Esquire (PA ID #44003)
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
(717) 703-5892
dzambito@cozen.com
jnase@cozen.com

**Attorneys for Pennsylvania-American Water
Company**