



October 17, 2023

VIA E-MAIL AND FIRST CLASS MAIL

David P. Zambito

Direct Phone 717-703-5892
Direct Fax 215-989-4216
dzambito@cozen.com

Aron J. Beatty
Senior Assistant Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

Re: Application of Pennsylvania-American Water Company Pursuant to Sections 1102 and 1329 of the Public Utility Code for Approval of the Transfer, by Sale, of Substantially All of the Assets, Properties and Rights Related to the Wastewater Collection and Conveyance System Owned by Borough of Brentwood; and the Rights to Begin to Offer or Furnish Wastewater Service to the Public in the Borough of Brentwood, Allegheny County, Pennsylvania; Docket No. A-2021-3024058, 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. Beatty:

Enclosed please find the above-referenced discovery. Pursuant to the Prehearing Order in this case, answers are due within five calendar days. Copies are being served in accordance with the attached Certificate of Service.

Thank you for your attention to this matter. Please contact me if you have any question or concern.

Sincerely,

Cozen O'Connor
Counsel for *Pennsylvania-American Water Company*

DPZ/kmg
Enclosure

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service Only*)
Per Certificate of Service
Elizabeth Rose Triscari, Esq.
Erin Fure, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania-American Water Company :
Pursuant to Sections 1102 and 1329 of the Public Utility :
Code for Approval of the Transfer, by Sale, of :
Substantially All of the Assets, Properties and Rights :
Related to the Wastewater Collection and Conveyance : Docket No. A-2021-3024058 *et al.*
System Owned by Borough of Brentwood; and the :
Rights to Begin to Offer or Furnish Wastewater Service :
to the Public in the Borough of Brentwood, Allegheny :
County, Pennsylvania :

CERTIFICATE OF SERVICE

I hereby certify that I have this 17th day of October, 2023 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 and in the manner described 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

Aron J. Beatty, Esq.
Christine Maloni Hoover, Esq.
Andrew J. Zerby, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
OCAPAWCBRENTWOOD@paoca.org
Counsel for *Office of Consumer Advocate*

Carrie B. Wright, Esq.
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, Second Floor West
Harrisburg, PA 17120
carwright@pa.gov
Counsel for *Bureau of Investigation and Enforcement*

Sharon E. Webb, Esq.
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov
Counsel for *Office of Small Business Advocate*

Thomas S. Wyatt, Esq.
Matthew S. Olesh, Esq.
Sydney N. Melillo, Esq.
Obermayer Rebman Maxwell & Hippel LLP
Centre Square West
1500 Market St., Suite 3400
Philadelphia, PA 19102-2101
thomas.wyatt@obermayer.com
matthew.olesh@obermayer.com
sydney.melillo@obermayer.com
Counsel for *Borough of Brentwood*

Scott T. Wyland, Esq.
Elana D. Schnall, Esq.
Salzmann Hughes, P.C.
1801 Market St., Suite 300
Camp Hill, PA 17011
swyland@salzmannhughes.com
eschnall@salzmannhughes.com
Counsel for *Allegheny County Sanitary Authority*

Respectfully submitted,



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

Counsel for
Pennsylvania-American Water Company