

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
Consumer Advocate

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October 23, 2023

Via Electronic Mail Only

David P. Zambito, Esquire
Jonathan P. Nase, Esquire
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
dzambito@cozen.com
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Counsel for PAWC

Re: Application of Pennsylvania-American Water Company under Sections 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 treatment system owned and operated by Towamencin Township and Towamencin Municipal Authority, and (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the Township of Towamencin and portions of the Townships of Franconia, Lower Salford and Worcester and the Borough of Lansdale, all in Montgomery County, Pennsylvania

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set I, in the above-referenced proceedings.

David P. Zambito, Esquire
Jonathan P. Nase, Esquire
Cozen O'Connor
October 23, 2023
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In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) days of service. 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.

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).

Sincerely,

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

Enclosures:

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

CERTIFICATE OF SERVICE

Application of Pennsylvania-American Water Company :
under Sections 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 : Docket No. A-2023-3039900
and treatment system owned and operated :
by Towamencin Township and Towamencin :
Municipal Authority, and (2) the rights of :
Pennsylvania-American Water Company to :
begin to offer or furnish wastewater service :
to the public in the Township of Towamencin and :
portions of the Townships of Franconia, :
Lower Salford and Worcester and the Borough of :
Lansdale, all in Montgomery County, Pennsylvania :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to the Pennsylvania American Water Company, Set I, 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 23rd day of October 2023.

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