

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
Consumer Advocate

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

 @pa_oca
 /pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

October 29, 2024

Via Electronic Mail Only

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

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 treatment plant and collection system owned and operated by the Elizabeth Borough Municipal Authority, (2) the rights of Pennsylvania-American Water Company to begin to offer or furnish wastewater service to the public in the Borough of Elizabeth, and portions of the Borough of Lincoln, and the Townships of Elizabeth and Forward, in Allegheny County, Pennsylvania
Docket No. A-2023-3038717

Counselors:

Enclosed please find Interrogatories of the Office of Consumer Advocate, Set 3, 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. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. Kindly communicate any objections you may have to these interrogatories as soon as possible.

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

OCAEBMA1329@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).

David P. Zambito, Esq.
Jonathan P. Nase, Esq.
October 29, 2024
Pg. 2

Respectfully submitted,

/s/ Christy M. Appleby
Christy M. Appleby, Esq.
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824
CAappleby@paoca.org

Enclosures

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

CERTIFICATE OF SERVICE

In re: Application of Pennsylvania- :
American Water Company under Sections : Docket No. A-2023-3038717
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 :
treatment plant and collection system :
owned and operated by the Elizabeth :
Borough Municipal Authority, (2) the :
rights of Pennsylvania- American Water :
Company to begin to offer or furnish :
wastewater service to the public in the :
Borough of Elizabeth, and portions of the :
Borough of Lincoln, and the Townships of :
Elizabeth and Forward, in Allegheny :
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 Pennsylvania-American Water Company, Set 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. This document was filed electronically on the Commission’s electronic filing system.

Dated this 29th day of October, 2024.

SERVICE BY E-MAIL ONLY

Allison Kaster, Esq.
Bureau of Investigation and Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
akaster@pa.gov

Rebecca Lyttle, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
relyttle@pa.gov

Teresa K. Harrold, Esq.
Corporate Counsel
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
teresa.harrold@amwater.com

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

Counsel for:
Patrick M. Cicero
Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
717-783-5048

Dated: October 29, 2024

/s/ Christy M. Appleby
Christy M. Appleby, Esq.
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824
CAppleby@paoca.org

Katie M. Kennedy, Esq.
Assistant Consumer Advocate
PA Attorney I.D. # 317237
KKennedy@paoca.org