

# COMMONWEALTH OF PENNSYLVANIA



DARRYL A. LAWRENCE  
Acting 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

May 6, 2025

**Via Electronic Mail Only**

David P. Zambito, Esq.  
Jonathan P. Nase, Esq.  
Cozen O'Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101  
Email: dzambito@cozen.com  
Email: 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-2025-3052983

Counselors:

Enclosed please find Interrogatories of the Office of Consumer Advocate to Pennsylvania-American Water Company and Elizabeth Borough Municipal Authority, Set 5, 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

David P. Zambito, Esq.  
Jonathan P. Nase, Esq.  
May 6, 2025  
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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/ Christy M. Appleby  
Christy M. Appleby, Esq.  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
Email: CAppleby@paoca.org

Enclosures

cc: PUC Secretary Matthew L. Homsher (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-2025-3052983  
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 and Elizabeth Borough Municipal Authority, Set 5, 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 6th day of May 2025.

### SERVICE BY E-MAIL ONLY

Michael A. Podskoch, Jr., Esq.  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
mpodskoch@pa.gov  
*Counsel for I&E*

Steven C. Gray, Esq.  
Rebecca Lyttle, Esq.  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
sgray@pa.gov  
relyttle@pa.gov  
*Counsel for OSBA*

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

Maurice A. Nernberg, Esq.  
David M. Nernberg, Esq.  
Maurice A. Nernberg & Associates  
301 Smithfield Street  
Pittsburgh, PA 15222  
man@nernberg.com  
dmn@nernberg.com  
*Counsel for Forward Township*

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:*  
Darryl A. Lawrence  
Acting Consumer Advocate  
  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
717-783-5048

Dated: May 6, 2025

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

Katie M. Kennedy, Esq.  
Assistant Consumer Advocate  
PA Attorney I.D. # 317237  
Email: KKennedy@paoca.org  
Email: OCAEBMA1329@paoca.org