

COMMONWEALTH OF PENNSYLVANIA



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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
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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 Elizabeth Borough Municipal Authority, Set 4, 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 Elizabeth Borough Municipal Authority, Set 4, 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

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Dated: May 6, 2025

/s/ Christy M. Appleby
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Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Harrisburg, PA 17105-3265
EFILING - FILING DETAIL

Date Created	Filing Number
5/6/2025	2766218

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

Docket Number: A-2025-3052983

Case Description:

Transmission Date: 5/6/2025 2:00 PM

Filed On: 5/6/2025 2:00 PM

eFiling Confirmation Number: 2766218

File Name	Document Type	Upload Date
OCA COS - Interrogatories to EBMA, Set 4.pdf	Certificate of Service	5/6/2025 2:00:50 PM

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg PA 17120 a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

No paper submission is necessary for filings under 250 pages.

You can view a record of this filing and previous filings you have submitted to the PUC by using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.