



DODARO, DALFONSO, MATTA & CAMBEST, P.C.

ATTORNEYS AT LAW

May 19, 2025

Maurice A. Nernberg, Esquire
David M. Nernberg, Esquire
Maurice A. Nernberg & Associates
301 Smithfield Street
Pittsburgh, PA 15222

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

EBMA Objections to Forward Township Interrogatories, Requests for Production and Requests for Admission Directed to Elizabeth Borough Municipal Authority

Dear Counsel,

Enclosed are Elizabeth Borough Municipal Authority's Objections to Forward Township Interrogatories, Requests for Production and Requests for Admission Directed to Elizabeth Borough Municipal Authority, dated May 19, 2025, in the above referenced proceeding.

If you have any questions, please do not hesitate to contact me.

Sincerely,

DODARO, DALFONSO
MATTA & CAMBEST, P.C.

Joseph R. Dalfonso, Esquire

cc: Matthew L. Homsher, Secretary (*eFiling: Cover Letter and Certificate of Service only*)
Officer of Consumer Advocate Group E-mail w/Enclosures: OCAEMBA1329@paoca.org
All Parties of Record

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

In 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 : Docket No: A-2025-3052983
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, Allegheny County, :
Pennsylvania

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a true copy of Elizabeth Borough Municipal Authority's Objections to Forward Township Interrogatories, Requests for Production and Requests for Admission Directed to Elizabeth Borough Municipal Authority, dated May 19, 2025, upon the parties, listed below in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

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

Christy M. Appleby, Esquire
Katie M. Kennedy, Esquire
PA Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
cappleby@paoca.org
kkennedy@pacoa.org

Allison Kaster, Esquire
Director
Bureau of Investigation & Enforcement
400 North Street
Harrisburg, PA 17120
akaster@pa.gov

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

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

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

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

Date: May 19, 2025

Respectfully Submitted,

/s/ Joseph R. Dalfonso

Joseph R. Dalfonso, Esquire (PA I.D. 311821)

Gary J. Matta, Esquire (PA I.D. 90750)

DODARO, DALFONSO,

MATTA & CAMBEST, P.C.

1900 Main Street, Suite 207

Canonsburg, PA 15317

jdalfonso@ddmclaw.com

gmatta@ddmclaw.com

Counsel for Elizabeth Borough Municipal Authority