



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**

**Forward Township Second Set of Interrogatories, and Requests for Production Directed to Elizabeth Borough Municipal Authority**

Dear Counsel,

Enclosed are Elizabeth Borough Municipal Authority's responses to Forward Township's Second Set of Interrogatories, and Requests for Production Directed to Elizabeth Borough Municipal Authority, dated May 19, 2025, in the above referenced proceeding. A secured electronic shared folder containing documents responsive to Requests for Production will be sent via email to all parties of record.

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](mailto: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 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 :  
: Docket No: A-2025-3052983

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this day served a true copy of Elizabeth Borough Municipal Authority’s Responses to Forward Township’s Second Set of Interrogatories, and Requests for Production 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](mailto:mpodskoch@pa.gov)

Christy M. Appleby, Esquire  
Katie M. Kennedy, Esquire  
PA Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5<sup>th</sup> Floor  
Harrisburg, PA 17101  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[kkennedy@pacoa.org](mailto:kkennedy@pacoa.org)

Allison Kaster, Esquire  
Director  
Bureau of Investigation & Enforcement  
400 North Street  
Harrisburg, PA 17120  
[akaster@pa.gov](mailto:akaster@pa.gov)

Teresa K. Harrold, Esquire  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
[teresa.harrold@amwater.com](mailto: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](mailto:dzambito@cozen.com)  
[jnase@cozen.com](mailto:jnase@cozen.com)

Steven Gray, Esquire  
Rebecca Lyttle, Esquire  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto: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](mailto: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](mailto:jdalfonso@ddmclaw.com)

[gmatta@ddmclaw.com](mailto:gmatta@ddmclaw.com)

*Counsel for Elizabeth Borough Municipal Authority*