



May 22, 2025

VIA E-MAIL

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David M. Nernberg, Esq.
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Re: Pennsylvania-American Water Company – Wastewater Division Section 1329 Application for the Acquisition of the Elizabeth Borough Municipal Authority Wastewater System; Docket No. A-2025-3052983

Pennsylvania-American Water Company's Amended Answers to Forward Township's Interrogatories, Requests for Production and Requests for Admissions – Set 1

Dear Mr. Nernberg:

As discussed during our telephone conversation yesterday, Pennsylvania-American Water Company ("PAWC") is amending its answers to several discovery questions in Forward Township's Set 1 in light of the discovery answers provided by the Elizabeth Borough Municipal Authority. For convenience, the changes in PAWC's answers are shown in black-line. PAWC is waiving the common interest privilege for the limited purpose of resolving the current discovery dispute and for no other purpose.

Based on the amended answers, PAWC withdraws the objections served on May 19, 2025. PAWC respectfully requests that Forward Township withdraw its May 21, 2025 Motion to Dismiss PAWC's Objections to Forward Township's Discovery and Require Direct Answers.

Copies have been served as shown on the attached certificate of service.

Please contact me if you have any questions or concerns.

Sincerely,

COZEN O'CONNOR

By: Jonathan P. Nase
Counsel for *Pennsylvania-American Water Company*

JPN
Enclosures

cc: Matthew L. Homsher, Secretary (*Cover Letter and Certificate of Service Only*)
Per Certificate of Service
Teresa Harrold, Esq., Pennsylvania-American Water Company

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania-American Water Company –	:	
Wastewater Division Section 1329	:	Docket No. A-2025-3052983
Application for the Acquisition of the	:	
Elizabeth Borough Municipal Authority	:	
Wastewater System	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Pennsylvania-American Water Company’s Amended Answers to Forward Township’s Interrogatories, Requests for Production and Requests for Admission – Set 1** upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND FIRST CLASS MAIL

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Respectfully submitted,

A handwritten signature in blue ink that reads "Jonathan P. Nase". The signature is written in a cursive style with a large initial 'J'.

Jonathan P. Nase, Esq.
Counsel for *Pennsylvania-American Water
Company*