

July 3, 2017

Jonathan P. Nase Direct Phone 717-773-4191 Direct Fax 215-372-2340 jnase@cozen.com

VIA E-MAIL AND FIRST CLASS MAIL

Gina L. Miller, Prosecutor Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street, 2 West Harrisburg, PA 17120

Re: Application of Pennsylvania-American Water Company-Wastewater under Section 1329 of the Pennsylvania Public Utility Code, 66 Pa. C.S. § 1329, for approval of the use for ratemaking purposes of the lesser of the fair market value or the negotiated purchase price of The Municipal Authority of the City of McKeesport's assets related to its wastewater collection and treatment system and other related transactions; Docket No. A-2017-2606103

PENNSYLVANIA-AMERICAN WATER COMPANY RESPONSES TO BUREAU OF INVESTIGATION AND ENFORCEMENT (I&E-16 through I&E-26)

Dear Ms. Miller:

Enclosed please find the Applicant's Responses to the above-referenced discovery requests. As a courtesy to the statutory advocates, PAWC solicited the enclosed responses from AUS Consultants and Herbert, Rowland and Grubic, Inc. (the buyer and seller Utility Valuation Experts, respectively) to discovery requests regarding their independent appraisals, PAWC does not necessarily endorse their responses. All active parties to this proceeding have been served in accordance with the enclosed Certificate of Service. If you have any questions, please feel free to contact me.

Sincerely,

COZEN O'CONNOR

the P. Nue

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

JPN:kmg

Enclosure

cc: Rosemary Chiavetta, Secretary (*Letter and Certificate of Service only*) Per Certificate of Service Susan Simms Marsh, Esquire

CERTIFICATE OF SERVICE

Application of Pennsylvania-American Water Company-Wastewater under Section 1329 of the Pennsylvania : Public Utility Code, 66 Pa. C.S. § 1329, for approval of : the use for ratemaking purposes of the lesser of the fair : market value or the negotiated purchase price of The : Municipal Authority of the City of McKeesport's assets : related to its wastewater collection and treatment : system and other related transactions

Docket No. A-2017-2606103

I hereby certify that I have this day served a true copy of the foregoing Responses to I&E Interrogatories Nos. 16-26 on behalf of Pennsylvania-American Water Company, 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:

Gina Miller, Esq. Erika McLain, Esq. Bureau of Investigation and Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor West Harrisburg, PA 17120 Counsel for *Bureau of Investigation & Enforcement* Christine Maloni Hoover, Esq. Erin L. Gannon, Esq. Office of Consumer Advocate 555 Walnut Street Forum Place, 5th Floor Harrisburg, PA 17101-1923 Counsel for *Office of Consumer Advocate*

Thomas S. Wyatt, Esquire Dilworth Paxon LLP 1500 Market Street Suite 3500E Philadelphia, PA 19102 Counsel for *Municipal Authority of the City of McKeesport*

DATED: July 3, 2017

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