

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, Pennsylvania 17101-1923  
(717) 783-5048  
800-684-6560



FAX (717) 783-7152  
consumer@paoca.org

May 14, 2020

**Via Electronic Mail Only**

Susan Simms Marsh, Esquire  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055

Re: Pennsylvania Public Utility Commission  
v.  
Pennsylvania-American Water Company  
Docket Nos. R-2020-3019369 (Water)  
C-2020-3019751  
R-2020-3019371 (Wastewater)  
C-2020-3019754

Dear Ms. Marsh:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set II, in the above-referenced proceedings.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries within fifteen (15) 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. We would appreciate it if you would 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 consultants, as listed below:

Ralph C. Smith  
Larkin & Associates, PLLC  
15728 Farmington Road  
Livonia, MI 48154  
E-Mail: [OCAPAWC2020@paoca.org](mailto:OCAPAWC2020@paoca.org)

Susan Simms Marsh, Esquire  
May 14, 2020  
Page 2

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).

Sincerely,

/s/ Christine Maloni Hoover  
Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: CHoover@paoca.org

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service only)  
Certificate of Service

\*288451

## CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission	:	Docket Nos. R-2020-3019369 (Water)
v.	:	C-2020-3019751
Pennsylvania-American Water Company	:	R-2020-3019371 (Wastewater)
	:	C-2020-3019754

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Pennsylvania-American Water Company, Set II, 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:

Dated this 14<sup>th</sup> day of May 2020.

### **SERVICE BY E-MAIL ONLY**

Carrie B. Wright, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Anthony C. DeCusatis, Esquire  
Kenneth M. Kulak, Esquire  
Brooke. E. McGlinn, Esquire  
Mark A. Lazaroff, Esquire  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921

Susan Simms Marsh, Esquire  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055

Jessica and Jeffrey LaBarge  
123 Fairmount Avenue  
Reading, PA 19606  
[jessi@russolawllc.com](mailto:jessi@russolawllc.com)

Daniel G. Asmus, Esquire  
Erin K. Fure, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

Elizabeth R. Marx, Esquire  
Ria M. Pereira, Esquire  
John W. Sweet, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

Victoria Lozinak  
609 Waterfall Way  
Phoenixville, PA 19460  
[victoriaeckman@gmail.com](mailto:victoriaeckman@gmail.com)

Mr. & Mrs. Gerald S. Lepre, Jr.  
4015 Fairfield Avenue  
Munhall, PA 15120  
[leprejrlaw@gmail.com](mailto:leprejrlaw@gmail.com)

/s/ Christine Maloni Hoover

Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

Lauren E. Guerra  
Assistant Consumer Advocate  
PA Attorney I.D. # 323192  
E-Mail: [LGuerra@paoca.org](mailto:LGuerra@paoca.org)

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: May 14, 2020  
\*288242

Erin L. Gannon  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 83487  
E-Mail: [EGannon@paoca.org](mailto:EGannon@paoca.org)

Harrison W. Breitman  
Assistant Consumer Advocate  
PA Attorney I.D. # 320580  
E-Mail: [HBreitman@paoca.org](mailto:HBreitman@paoca.org)