

# Morgan Lewis

**Kenneth M. Kulak**

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

May 27, 2020

## **VIA eFILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v.  
Pennsylvania-American Water Company  
Docket Nos. R-2020-3019369, C-2020-3019646,  
R-2020-3019371, and C-2020-3019670**


---

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced matter is the **Objections of Pennsylvania-American Water Company to the First Set of Interrogatories and First Set of Request for Production of Documents of Mr. and Mrs. Gerald S. Lepre, Jr.** Copies of the Objections have been served in accordance with the enclosed Certificate of Service.

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

Very truly yours,



Kenneth M. Kulak

KMK/ap  
Enclosures

c: Per Certificate of Service (w/encls.)

**Morgan, Lewis & Bockius LLP**

1701 Market Street  
Philadelphia, PA 19103-2921  
United States

**T** +1.215.963.5000  
**F** +1.215.963.5001

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION</b>	: : : : : : : : : :	<b>DOCKET NOS. R-2020-3019369 C-2020-3019646 R-2020-3019371 C-2020-3019670</b>
<b>v.</b>	:	
<b>PENNSYLVANIA-AMERICAN WATER COMPANY</b>	: : : : : : :	
<b>Respondent</b>	:	

**OBJECTIONS OF PENNSYLVANIA-AMERICAN WATER COMPANY  
TO THE FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS OF MR. & MRS. GERALD S. LEPRE, JR.**

Pursuant to 66 Pa. C.S. §333(d) and 52 Pa. Code §5.342, Pennsylvania-American Water Company (“PAWC” or the “Company”) hereby objects to the First Set of Interrogatories and First Request for Production of Documents (“Set I”) propounded by Mr. and Mrs. Gerald S. Lepre, Jr. (“Lepre”). A copy of Set I, which consists of thirteen requests (each, a “Request” and collectively the “Requests”), is attached as Appendix A and incorporated herein by reference.

As explained below, PAWC has objections to the Lepre’s Instructions and Requests. Subject to, and without waiving, its objections, PAWC will provide responses consisting of non-privileged information and/or documents that are available to it or can be obtained by a reasonable search and without undue burden, are relevant to matters that properly may be addressed in this proceeding, and may properly be requested under the Pennsylvania Public Utility Commission (“PUC” or “Commission”) regulations governing discovery in Commission proceedings.

## **GENERAL OBJECTIONS**

1. PAWC objects to each Instruction and each Request to the extent that they seek information or documents that cannot be identified, located or produced after a reasonable search.

2. PAWC objects to each Instruction and each Request to the extent that they are overbroad, unduly burdensome and seek the production of information, documents and/or things that are not relevant to the matters properly addressed in this proceeding. PAWC objects to each Instruction and each Request to the extent that they lack reasonable limitation in regard to subject matter, temporal or geographic scope and/or other criteria.

3. PAWC objects to each Instruction and each Request to the extent that they seek information or documents protected by the attorney-client privilege, the work-product doctrine, or any other applicable privilege, doctrine or rule of confidentiality or are otherwise protected from disclosure under Subchapter D of Chapter 5 the Commission's rules of practice and procedure.

4. PAWC objects to each Instruction and each Request to the extent that they seek to impose obligations or burdens on PAWC beyond those required and/or permitted by the applicable provisions of the Commission's regulations governing discovery.

5. PAWC objects to each Instruction and each Request to the extent that they could seek information, documents and/or things from PAWC that contain trade secrets, other confidential research, developmental or commercial information that is of a proprietary or commercially sensitive nature, and such information, documents and/or things shall not be

disclosed or shall be disclosed only after satisfactory protection is in place to assure that confidentiality is maintained prior to, during and after this proceeding.

6. PAWC objects to Instruction No. 5 to the extent that agents, contractors and/or other representatives could not reasonably and practicably be compelled to produce information or documents that may be the subject of discovery.

7. PAWC objects to Instruction No. 7 on the grounds that it includes “drafts, preliminary versions, alternations, modifications, revisions, changes, amendments and written comments concerning the foregoing” in contravention of the Commission’s applicable regulations on discovery.

8. To the extent that PAWC objects to a particular interrogatory on the basis of a specific objection, it does not thereby waive the General Objections. To the extent that PAWC objects to a particular interrogatory either generally or specifically but proceeds to answer that interrogatory in whole or in part, it does not thereby waive any objection to the interrogatory in question.

9. PAWC reserves the right to assert additional objections to the production of information or documents responsive to the Requests, as appropriate, and to supplement or to change its objection and responses.

## ADDITIONAL OBJECTIONS

### **Request 3**

**Q:** Please provide a copy of any and all financial records of the PAWC and/or American Water for the previous five (5) years for water and/or wastewater.

**Objections:** PAWC objects to this Request on the grounds that it is overbroad, would require an unreasonable search or investigation, would impose an unreasonable burden and would require production of documents not reasonably related to matters addressed in this proceeding and, therefore, is outside the permissible bounds of discovery set forth in 66 Pa. C.S. §333(d) and the Commission's applicable regulations. PAWC also objects to this Request to the extent it seeks information that is publicly available, and to the extent it seeks information that is confidential, proprietary, or commercially sensitive. PAWC also objects to the use of the terms "American Water" and "for water and/or wastewater" as vague. "Any and all" financial records of PAWC and/or American Water for the previous five years, even if limited to those directly related to water and/or wastewater operations, would include a large number of records, many of which are irrelevant to this proceeding and/or contain information that is confidential, proprietary, or commercially sensitive. Subject to and without waiving any of the General Objections and/or the Objections set forth herein, PAWC provides the following response: American Water's filings with the United States Securities and Exchange Commission ("SEC") are available at <https://ir.amwater.com/site/Financial-Reports/sec-filings> and the financial records filed in support of the Company's filing for a rate increase in this proceeding are available on the Commission's electronic docket for this proceeding at [http://www.puc.pa.gov/about\\_puc/consolidated\\_case\\_view.aspx?Docket=R-2020-3019371](http://www.puc.pa.gov/about_puc/consolidated_case_view.aspx?Docket=R-2020-3019371).

### **Request 6**

**Q:** Please provide any and all documents or information referencing the sale and purchase (including the purchase price) of the water rights from the Borough of Munhall in 1987.

**Objections:** PAWC objects to this Request on the grounds that it is overbroad, would require an unreasonable search or investigation, would impose an unreasonable burden and would require production of documents not reasonably related to matters addressed in this proceeding and, therefore, is outside the permissible bounds of discovery set forth in 66 Pa. C.S. §333(d) and the Commission's applicable regulations. PAWC also objects to this Request to the extent it seeks information that is publicly available, and to the extent it seeks information that is confidential, proprietary, or commercially sensitive. Subject to and without waiving any of the General Objections and/or the Objections set forth herein, PAWC provides the following response: The Company acquired the water assets of the Borough of Munhall and was granted a Certificate of Public Convenience (the "Certificate") by the Commission to provide water service to the residents of the Borough of Munhall in 1987. The Company has had several base rate cases before the Commission since that time. In granting the Certificate to the Company, the Commission determined that the acquisition was in the public interest and would provide affirmative public benefits. *See In the Matter of the Application of Western Pennsylvania Water Company and the Borough of Munhall*, Order, P.U.C. Docket No. A-213200 (March 19, 1987). A copy of the Commission's Order approving the acquisition and enclosing the Certificate is attached as Appendix B.

### **Request 11**

**Q:** Please provide a copy of any and all written statements signed or otherwise adopted or approved by the person making it.

**Objections:** PAWC objects to this Request on the grounds that it is overbroad, would require an unreasonable search or investigation, would impose an unreasonable burden and would require production of documents not reasonably related to matters addressed in this proceeding and, therefore, is outside the permissible bounds of discovery set forth in 66 Pa. C.S. §333(d) and the Commission's applicable regulations. PAWC also objects to the Request as vague. It is unclear what "statements" the Request is referring to. Subject to and without waiving any of the General Objections and/or the Objections set forth herein, all statements and documents filed in support of the Company's filing for a rate increase in this proceeding are available on the Commission's electronic docket for this proceeding at

[http://www.puc.pa.gov/about\\_puc/consolidated\\_case\\_view.aspx?Docket=R-2020-3019371](http://www.puc.pa.gov/about_puc/consolidated_case_view.aspx?Docket=R-2020-3019371).

#### **Request 12**

**Q:** Please provide a copy of any and all stenographic, mechanical, electrical or other recording, or a transcription thereof, which is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.

**Objections:** PAWC objects to this Request on the grounds that it is overbroad, would require an unreasonable search or investigation, would impose an unreasonable burden and would require production of documents not reasonably related to matters addressed in this proceeding and, therefore, is outside the permissible bounds of discovery set forth in 66 Pa. C.S. §333(d) and the Commission's applicable regulations. PAWC also objects to the Request as vague. It is unclear what types of documents the Request is seeking. Subject to and without waiving any of the General Objections and/or the Objections set forth herein, the Company does not have any documents responsive to this Request.

### **Request 13**

**Q:** A copy of any and all contracts, sub-contracts, bids, offers, receipts, invoices, estimates or other such documentation on any anticipated or projected improvements relating to and/or in support of any rate increase.

**Objections:** PAWC objects to this Request on the grounds that it is overbroad, would require an unreasonable search or investigation, would impose an unreasonable burden and would require production of documents not reasonably related to matters addressed in this proceeding and, therefore, is outside the permissible bounds of discovery set forth in 66 Pa. C.S. §333(d) and the Commission's applicable regulations. PAWC also objects to this Request to the extent it seeks information that is confidential, proprietary, or commercially sensitive. "Any and all"

"contracts, sub-contracts, bids, offers, receipts, invoices, estimates or other such documentation on any anticipated or projected improvements relating to and/or in support of any rate increase" would include countless records, many of which are irrelevant to this proceeding and/or contain information that is confidential, proprietary, or commercially sensitive. Subject to and without waiving any of the General Objections and/or the Objections set forth herein, PAWC provides the following response: Testimony and documentation related to the Company's incurred and anticipated costs, as related to the Company's request for a rate increase in this proceeding, is available on the Commission's electronic docket for this proceeding at [http://www.puc.pa.gov/about\\_puc/consolidated\\_case\\_view.aspx?Docket=R-2020-3019371](http://www.puc.pa.gov/about_puc/consolidated_case_view.aspx?Docket=R-2020-3019371).



WHEREFORE, for the foregoing reasons, the objections of Pennsylvania-American Water Company to Lepre' s Requests (Set I) should be granted if a mutually agreeable resolution is not reached by the parties.

Respectfully submitted,



---

Kenneth M. Kulak (PA I.D. No. 75509)  
Anthony C. DeCusatis (PA I.D. No. 25700)  
Brooke E. McGlinn (PA I.D. No. 204918)  
Mark A. Lazaroff (PA I.D. No. 315407)  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
215.963.5384 (bus)  
215.963.5001 (fax)  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[anthony.decusatis@morganlewis.com](mailto:anthony.decusatis@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)

Susan Simms Marsh (PA I.D. No. 44689)  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
717.550.1570 (bus)  
[susan.marsh@amwater.com](mailto:susan.marsh@amwater.com)

David P. Zambito (PA I.D. No. 80017)  
Cozen O'Connor  
Suite 1410  
17 North Second Street  
Harrisburg, PA 17101  
717.703.5892 (bus)  
[dzambito@cozen.com](mailto:dzambito@cozen.com)

*Counsel for*  
*Pennsylvania-American Water Company*

Dated: May 27, 2020

## **APPENDIX A**

LEPRE INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

(SET I)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

MR. & MRS. GERALD S. LEPRE, JR.,	:	
	:	
Plaintiff's,	:	Docket Nos.
	:	C-2020-3019369 (Water)
	:	C-2020-3019646 (Wastewater)
Vs.	:	
	:	
PENNSYLVANIA AMERICAN WATER	:	
COMPANY,	:	
	:	
Respondent.	:	
_____	:	

**INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS  
OF MR. & MRS. GERALD S. LEPRE, JR. DIRECTED TO RESPONDENT**

Pursuant to 52 Pa. Code § 5.341, Mr. & Mrs. Gerald S. Lepre, Jr., Consumers, by and through themselves, hereby propound the following Interrogatories and Requests for Production to Respondent Pennsylvania-American Water Company (PAWC) to be answered by those officers, employees, agents, or contractors who have knowledge of the requested facts and who are authorized to answer on behalf of the Authority. Each interrogatory and/or request for production is to be verified by the responding witness in accordance with 52 Pa. Code § 5.342 et

**INSTRUCTIONS**

1. These interrogatories and requests for production shall be construed as a continuing request. The Respondent is obliged to change, supplement and correct all answers to interrogatories and requests for production to conform to available information, including such information as first becomes available to the Respondent after the answers hereto are filed.
2. Restate the interrogatory and request for production immediately preceding each response.

3. Identify the name, title, and business address of each person(s) providing each response.

4. Provide the date on which the response was created.

5. Divulge all information that is within the knowledge, possession, control, or custody of Respondent or may be reasonably ascertained thereby. The term "Pennsylvania-American Water Company", "Pennsylvania-American", "PAWC", "the Company", or "you" as used herein includes Pennsylvania-American Water Company, its attorneys, agents, employees, contractors, or other representatives, to the extent that the Authority has the right to compel the action requested herein.

6. Provide a verification by the responsible witness that all facts contained in the response are true and correct to the best of the witness' knowledge, information and belief.

7. As used herein, but only to the extent not protected by 52 Pa. Code Section 5.323, the word "document" or "workpaper" includes, but is not limited to, the original and all copies in whatever form, stored or contained in or on whatever media or medium, including computerized memory, magnetic, electronic, or optical media, regardless of origin, and whether or not including additional writing thereon or attached thereto, and may consist of:

a) notations of any sort concerning conversations, emails, texts, SMS messages, MMS messages, telephone calls, meetings or other communications;

b) bulletins, advertisements, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys;

c) worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing.

1. Please provide a copy of any and all exhibits to be utilized during a trial or that support your claim of a rate increase in water or wastewater.
2. Please provide a copy of any and all depositions (video or stenographical) taking in this matter with any and all deposition exhibits.
3. Please provide a copy of any and all financial records of the PAWC and/or American Water for the previous five (5) years for water and/or wastewater.
4. Please provide the monthly balance sheet, expense statements and income statements for PAWC and/or American Water Works or each year from January 1, 2015 to the most currently available.
5. Please provide the monthly balance sheet, expense statements and income statements for American Water Works for each year from January 1, 2015 to the most currently available.
6. Please provide any and all documents or information referencing the sale and purchase (including the purchase price) of the water rights from the Borough of Munhall in 1987.
7. Please provide a list of all outstanding bonds issued by PAWC and/or American Water Works.
8. Please provide a list of all requests made by PAWC and/or American Water to securitize costs.
9. Does PAWC and/or American Water Works plan to request securitizing costs related to expenses in Pennsylvania or any other state because of COVID-19? If so, please explain. If not, please explain.
10. Does PAWC and/or American Water Works intend to present expert witness during the trial? If so, please provide name of expert and a curriculum vitae.

11. Please provide a copy of any and all written statements signed or otherwise adopted or approved by the person making it.

12. Please provide a copy of any and all stenographic, mechanical, electrical or other recording, or a transcription thereof, which is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.

13. A copy of any and all contracts, sub-contracts, bids, offers, receipts, invoices, estimates or other such documentation on any anticipated or projected improvements relating to and/or in support of any rate increase.

Respectfully submitted:

A handwritten signature in dark ink, appearing to read "Gerald S. Lepre, Jr.", written over a horizontal line.

Mr. & Mrs. Gerald S. Lepre, Jr.  
4015 Fairfield Avenue  
Munhall, PA 15120  
Phone: 1 (412) 927-8942  
Email: [leprejrlaw@gmail.com](mailto:leprejrlaw@gmail.com)

## **APPENDIX B**

### **COMMISSION ORDER APPROVING THE ACQUISITION OF THE WATER ASSETS OF THE BOROUGH OF MUNHALL**

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

**IN THE MATTER OF THE APPLICATION OF**

Western Pennsylvania Water Company and the Borough of Munhall for approval of (1) the transfer by sale of all the waterworks Property and Rights of the Borough of Munhall to Western Pennsylvania Water Company, (2) the Rights of Western Pennsylvania Water Company to Begin to Offer or Furnish Water Service to the Public in the Borough of Munhall, Allegheny County, and (3) the Permanent Discontinuance by the Borough of Munhall of all Water Service to the Public.

**CERTIFICATE  
OF  
PUBLIC CONVENIENCE**  
A-213200

The Pennsylvania Public Utility Commission hereby certifies that after an investigation and/or hearing had on the above entitled application, it has, by its report and order made and entered, a copy of which is attached hereto and made a part hereof, found and determined that the granting of said application is necessary or proper for the service, accommodation, convenience and safety of the public, and this certificate is issued evidencing its approval of the said application as set forth in said report and order.

**In Testimony Whereof,** The PENNSYLVANIA PUBLIC UTILITY COMMISSION has caused these presents to be signed and sealed, and duly attested by its Secretary at its office in the city of Harrisburg this        19th        day of        March        1987

**PENNSYLVANIA  
PUBLIC UTILITY COMMISSION**

Attest:



Secretary



PENNSYLVANIA  
PUBLIC UTILITY COMMISSION  
Harrisburg, PA 17120

Public Meeting held March 19, 1987

Commissioners Present:

Linda C. Taliaferro, Chairman  
Frank Fischl  
Bill Shane

Application of Western Pennsylvania  
Water Company and the Borough of  
Munhall for Approval of (1) the  
Transfer by Sale of all the  
Waterworks Property and Rights  
of the Borough of Munhall to  
Western Pennsylvania Water Company,  
(2) the Rights of Western Pennsyl-  
vania Water Company to Begin to  
Offer or Furnish Water Service  
to the Public in the Borough of  
Munhall, Allegheny County, and  
(3) the Permanent Discontinuance  
by the Borough of Munhall of all  
Water Service to the Public.

A-213200

O R D E R

BY THE COMMISSION:

By the joint application filed on January 21, 1987, Western Pennsylvania Water Company (WPW), 410 Cooke Lane, Pittsburgh, PA 15234, and the Borough of Munhall, 1900 West Street, Munhall, PA 15120, seek Commission approval of (1) the transfer by sale of all the waterworks property and rights of Munhall Borough to WPW, (2) the rights of WPW to begin to offer or furnish water service to the public in additional portions of the Borough of Munhall, Allegheny County and (3) the permanent discontinuance by the Borough of Munhall of all water service to the public.

Applicants submitted proofs of service and publication. There were no protests filed and no hearing was held. There were no motions or petitions in this proceeding.

Western Pennsylvania Water Company, a Pennsylvania utility corporation, furnishes water service to approximately 246,590 customers in numerous municipalities located in Allegheny, Armstrong, Beaver,

Butler, Clarion, Fayette, Indiana, Jefferson, Lawrence, McKean, Warren and Washington Counties pursuant to its charter, as amended, as well as certificates of public convenience issued by the Commission.

Western Pennsylvania Water Company, Pittsburgh District, now possesses all requisite charter and the Commission's certificate authority to furnish, and is presently furnishing water service to the public, in the following Allegheny County communities: all four Wards and in portions of the five remaining Wards, in the City of Pittsburgh; the City of Clairton; all of the Boroughs of Baldwin, Bethel Park, Brentwood, Bridgeville, Carnegie, Castle Shannon, Crafton, Dormont, Elizabeth, Glassport, Green Tree, Heidelberg, Ingram, Jefferson, Liberty, Lincoln, Mt. Oliver, Munhall, Pleasant Hills, Port Vue, Rosslyn Farms, Thornburg, West Elizabeth, West Homestead, West Mifflin, Whitaker and Whitehall; a portion of the Boroughs of Dravosburg and McDonald; all of the Townships of Baldwin, Collier, Elizabeth, Forward, Mt. Lebanon, North Fayette, Robinson, Scott, South Fayette, South Park and Upper St. Clair, all in Allegheny County.

Munhall Borough is located along the banks of the Monongahela River some eight miles up from the Point in downtown Pittsburgh. The land areas within the Borough are fully developed with residential, commercial and industrial properties. Both the Borough and WPW own, operate and maintain water distribution facilities within this Borough's corporate boundaries. However, neither the Borough nor WPW maintains water storage facilities within the Borough limits. The Borough's facilities are used to distribute an average of 720,000 gallons per day of water purchased in bulk quantities from WPW's supply facilities. The Borough was reselling this water to its 1,491 customers through their distribution system consisting of approximately 6.5 miles of cast iron water mains ranging in diameter from ten to twenty-four inches. WPW acquisition of the Borough's distribution system will have no effect upon WPW's daily demand and peak average demand. In addition to supplying bulk water to the Borough, WPW also supplies and distributes water to some 1,795 retail customers within the Borough limits. WPW has been providing water service to the Borough since 1908.

Munhall Borough had executed a proposal on December 15, 1986 to transfer, by sale, all of its waterworks property and service rights to WPW for \$750,000. No investment securities will be transferred. WPW will finance the acquisition by a short-term bank debt. Munhall Borough and WPW are not affiliated and the transfer price was determined by arm's-length negotiations. Munhall Borough does not owe any special and general assessments to the Commission pursuant to Section 1201 of the Public Utility Law.

The rates for service on file with the Commission in WPW's current tariff will be charged to Munhall Borough's customers. There will be no effect on the rates for service to WPW's existing customers as a result of the acquisition of additional territory in the Borough of Munhall.

Upon full consideration of all matters of record, we find that approval of this application is necessary or proper for the service, accommodation, convenience or safety of the public; THEREFORE,

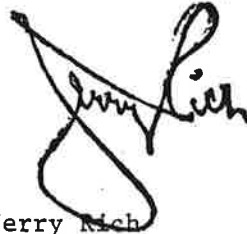
IT IS ORDERED:

1. That the joint application of Western Pennsylvania Water Company and the Borough of Munhall be and is hereby approved, and that appropriate Certificates of Public Convenience be issued authorizing (a) the transfer, by sale, of all the waterworks property and service rights of Munhall Borough to Western Pennsylvania Water Company, (b) the right of Western Pennsylvania Water Company to begin to offer or furnish water service to the public in additional portions of Munhall Borough, Allegheny County, and (c) the permanent discontinuance by the Borough of Munhall of all water service to the public.

2. That Western Pennsylvania Water Company provide service to Munhall Borough's customers pursuant to WPW's current tariff Rates and Regulations on file with this Commission.

3. That Western Pennsylvania Water Company file within 60 days of service of this Order, a statement setting forth (a) the date the transaction hereby approved has been effectuated, and (b) a detailed list of total expenses incurred in obtaining Commission approval.

BY THE COMMISSION,

A handwritten signature in black ink, appearing to read "Jerry Rich", written over a large, stylized "X" or "8" shape.

Jerry Rich  
Secretary

(SEAL)

ORDER ADOPTED: March 19, 1987

ORDER ENTERED: March 27, 1987

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION</b>	:	<b>Docket Nos. R-2020-3019369 C-2020-3019646</b>
	:	
	:	
<b>v.</b>	:	<b>Docket Nos. R-2020-3019371 C-2020-3019670</b>
	:	
<b>PENNSYLVANIA-AMERICAN WATER COMPANY</b>	:	
	:	

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a copy of the **Objections of Pennsylvania-American Water Company to the First Set of Interrogatories and First Set of Request for Production of Documents of Mr. and Mrs. Gerald S. Lepre, Jr.** in the above-referenced proceedings on the following persons, in the manner specified below, in accordance with the requirements of 52 Pa. Code § 1.54:

**VIA ELECTRONIC MAIL**

Administrative Law Judge Conrad A. Johnson  
Piatt Place - Suite 220  
301 5th Avenue  
Pittsburgh, PA 15222  
[cojohnson@pa.gov](mailto:cojohnson@pa.gov)

Carrie B. Wright  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
[carwright@pa.gov](mailto:carwright@pa.gov)

Christine M. Hoover  
Lauren E. Guerra  
Erin L. Gannon  
Harrison W. Breitman  
Pennsylvania Office of Consumer  
Advocate 5th Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17101  
[choover@paoca.org](mailto:choover@paoca.org)  
[lguerra@paoca.org](mailto:lguerra@paoca.org)  
[egannon@paoca.org](mailto:egannon@paoca.org)  
[hbreitman@paoca.org](mailto:hbreitman@paoca.org)

Erin K. Fure  
Daniel G. Asmus  
Small Business Advocate  
Pennsylvania Office of Small Business  
Advocate  
1st Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17101  
[efure@pa.gov](mailto:efure@pa.gov)  
[dasmus@pa.gov](mailto:dasmus@pa.gov)

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

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

David F. Boehm  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, OH 45202  
[dboehm@bklawfirm.com](mailto:dboehm@bklawfirm.com)

Ria M. Pereira  
John W. Sweet  
Elizabeth R. Marx  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)  
*Counsel for CAUSE-PA*

Joseph L. Vullo  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Counsel for Commission on Economic  
Opportunity*

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



---

Kenneth M. Kulak (PA I.D. No. 75509)  
Anthony C. DeCusatis (PA I.D. No. 25700)  
Brooke E. McGlinn (PA I.D. No. 204918)  
Mark A. Lazaroff (PA I.D. No. 315407)  
Morgan, Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
215.963.5034 (bus)  
215.963.5001 (fax)  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[anthony.decusatis@morganlewis.com](mailto:anthony.decusatis@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)

Susan Simms Marsh (PA I.D. No. 44689)  
Deputy General Counsel  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
717.550.1570 (bus)  
717.550.1255 (fax)  
[susan.marsh@amwater.com](mailto:susan.marsh@amwater.com)

Dated: May 27, 2020

*Counsel for*  
*Pennsylvania-American Water Company*