

Morgan Lewis

Kenneth M. Kulak

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

June 3, 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 and R-2020-3019371**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced matter is the **Prehearing Conference Memorandum on behalf of Pennsylvania-American Water Company**. Copies have been served on presiding Administrative Law Judge Conrad A. Johnson and all parties of record as indicated on the attached 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.)

DB1/ 114256541.1

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**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	Docket No. R-2020-3019369
	:	Docket No. R-2020-3019371
	:	
v.	:	
	:	
PENNSYLVANIA-AMERICAN WATER COMPANY	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the **Prehearing Conference Memorandum on behalf of Pennsylvania-American Water Company** 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

Carrie B. Wright
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
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
lguerra@paoca.org
egannon@paoca.org
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
dasmus@pa.gov

Jessica and Jeffrey LaBarge
123 Fairmount Avenue
Reading, PA 19606
jessi@russolawllc.com

Mr. and Mrs. Gerald S. Lepre, Jr.,
4015 Fairfield Avenue
Munhall, PA 15120
leprejrlaw@gmail.com

Kurt J. Boehm, Esq.
Michael I. Kurtz, Esq.
Jody Kyler Cohn, Esq.
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
kboehm@bkllawfirm.com
mkurtz@bkllawfirm.com
jkylercohn@bkllawfirm.com
Counsel for AK Steel Corp.

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

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

Victoria Lozinak
609 Waterfall Way
Phoenixville, PA 19460
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
anthony.decusatis@morganlewis.com
brooke.mcglinn@morganlewis.com
mark.lazaroff@morganlewis.com

Susan Simms Marsh (PA I.D. No. 44689)
Elizabeth Rose Triscari (PA I.D. No. 306921)
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
717.550.1570 (bus)
717.550.1255 (fax)
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

Dated: June 3, 2020

Counsel for
Pennsylvania-American Water Company

PENNSYLVANIA PUBLIC UTILITY	:	
COMMISSION	:	
	:	
v.	:	DOCKET NOS. R-2020-3019369
	:	R-2020-3019371
PENNSYLVANIA-AMERICAN WATER	:	
COMPANY	:	

Before Administrative Law Judge Conrad A. Johnson

Dated: June 3, 2020

I. INTRODUCTION

Pennsylvania-American Water Company (“PAWC” or the “Company”) is a public utility that provides water and wastewater services to approximately 740,000 residential, commercial, industrial and governmental communities located in 36 of the 67 counties in Pennsylvania. The Company was formed, with Commission approval, by the merger of the former Pennsylvania-American Water Company into Western Pennsylvania Water Company on February 1, 1989. The Company is a subsidiary of American Water Works Company, Inc., which is headquartered in Camden, New Jersey.

On April 29, 2020, the Company filed Supplement No. 19 to Original Tariff Water – Pa. P.U.C. No. 5 (“Water Tariff Supplement”) and Supplement No. 19 to Original Tariff Wastewater – Pa. P.U.C. No. 16 (“Wastewater Tariff Supplement”), requesting an increase in its total annual operating revenues to become effective June 28, 2020. The Company is seeking an increase in water and wastewater rates based on a multi-year plan ending December 31, 2022. The requested increase equals \$138.6 million over two years: \$92.4 million, annualized over the entire year 2021,¹ and \$46.2 million in 2022. This equates to an annualized 12.9% revenue increase in 2021 and a 5.8% revenue increase in 2022.

By Orders entered May 21, 2020, the Pennsylvania Public Utility Commission (the “Commission”) instituted a formal investigation at Docket Nos. R-2020-3019369 (Water) and R-2020-3019371 (Wastewater) to determine the lawfulness, justness and reasonableness of the Company’s existing and proposed rates, rules and regulations. Accordingly, the Water Tariff Supplement and Wastewater Tariff Supplement were suspended by operation of law until

¹ Because new rates would become effective on January 28, 2021 if implemented at the end of the current suspension period, the non-annualized increase in 2021 would be less than \$92.4 million and the non-annualized total increase would be less than \$138.6 million.

January 28, 2021, unless permitted by Commission order to become effective at an earlier date.

Accompanying the Water and Wastewater Tariff Supplements, the Company filed the extensive and detailed supporting information required by the Commission's regulations, including the prepared direct testimony of the Company's initial witnesses and the various exhibits to be sponsored by them. During the course of this case, the Company may submit additional testimony and exhibits in response to the presentations of, or cross-examination by, other parties. In addition, the Company may revise certain statements and exhibits during the course of the Commission's investigation to reflect known and measurable changes reasonably expected to occur during the applicable test periods.

Pursuant to Section 1330, which was added to the Public Utility Code ("Code") by Act 58 of 2018 ("Act 58"), the Company is employing a multi-year rate plan encompassing the twelve months ending December 31, 2021 ("Rate Year 1") and the twelve months ending December 31, 2022 ("Rate Year 2"). In support of the Company's proposed rate increase, the Company has presented data for the historic test year ended December 31, 2019, the future test year ending December 31, 2020, Rate Year 1, and Rate Year 2. Rate Year 1 corresponds to the fully projected future test year the Company is permitted to employ under the terms of Section 315(e) of the Code. Consequently, the Company's multi-year rate plan extends one year beyond a fully projected future test year. The Company intends to rely primarily on the Rate Year 1 and Rate Year 2 data in support of its proposed rate increase. It is the Company's belief that the record at the close of this proceeding will demonstrate the justness and reasonableness of its proposed rates.

II. ISSUES

Generally, every rate case presents two major issues for resolution: (1) the total amount of the revenue increase to which the utility is entitled; and (2) the allocation of the increased revenues among the utility's customer classifications through a rate structure and rate design that will produce the required revenue. As discussed below, the Company's computation of its required revenue increase and its proposed allocation of the increase to each customer classification have been developed by applying principles and procedures that, for the most part, the Commission has reviewed and approved in numerous prior cases.

A determination of the total revenue increase to which a utility is entitled involves a number of elements that may be grouped under three headings and characterized as the following major sub-issues:

(1) **TOTAL RETURN.** The total return is the operating income required by the utility to achieve an overall fair rate of return on its claimed rate base. Identifying a fair rate of return involves determining the appropriate cost rate, expressed as a percentage, for each form of capital (debt, preferred stock and common equity) the Company and its investors have committed to furnishing water and wastewater service. The total return allowed by the Commission must be sufficient to enable the Company to maintain the financial integrity of its existing capital and to attract additional investment on reasonable terms. In particular, the Company must be permitted a reasonable opportunity to earn a return on the portion of its rate base financed by common equity that is commensurate with the returns on equity realized by investments in other enterprises having similar risks. The appropriate rate of return for the Company, and in particular the appropriate return rate for the Company's common equity, is an

issue that is critical to the well-being of the Company and its ability to continue to provide the service that its customers have been receiving and are entitled to receive in the future.

(2) **OPERATING EXPENSES.** Operating expenses consist of the future or ongoing level of the utility's total operating expenses, including depreciation and taxes, that must be recovered from customers through rates in order for a utility to have a reasonable opportunity to achieve its allowed rate of return.

(3) **REVENUES.** This component consists of the total revenue from utility operations that is normally available to the utility under present rates and will be produced by the proposed rate levels.

The increase in revenue and rate levels required to produce a fair rate of return is determined by comparing the revenue produced by the utility's present rates with its total required operating income and anticipated operating expenses, depreciation and taxes.

The allocation of the proposed revenue increase and the Company's proposed rate structure and rate design are explained in the Statement of Specific Reasons for Proposed Increase in Rates submitted with the Company's initial filing and further described in the direct testimony of Ashley E. Everette and Constance E. Heppenstall. As set forth therein, the Company's proposed rate structure continues to implement the Commission-approved concept of establishing a uniform set of rates to apply Company-wide. In this case, the Company proposes the following rate structure changes:

- (1) The consolidation of rate zones, where possible, such that the rates charged customers are the same regardless of geographic location;
- (2) An increase in the low-income discount for water and wastewater customers;

- (3) An increase of monthly service charges to be more in line with customer cost of service;
- (4) The combining of a portion of the revenue requirement for wastewater operations with the revenue requirement for water operations pursuant to Section 1311(c), which was also added to the Code by Act 11 of 2012 (“Act 11”);
- (5) A change in annual public fire hydrant rates to reflect 25% of the cost of public fire protection service, pursuant to Section 1328 of the Code; and
- (6) The allocation of the requested rate increase in a manner designed to realign revenues by major customer classes to be more commensurate with the indicated cost of service where possible.

III. WITNESSES

Set forth below are the anticipated case-in-chief witnesses for the Company and a brief description of the subject matter of their testimony and exhibits:

Rod P. Nevirauskas is Senior Director of Rates and Regulatory for American Water Works Service Company, Inc. (“AWWSC” or “Service Company”). His written testimony is set forth in PAWC Statement No. 1, and he is sponsoring portions of PAWC Exhibit 3-A. PAWC Exhibit 3-A is the Company’s principal accounting exhibit and, as such, sets forth the development of the Company’s revenue requirement and its proposed revenue increase. Mr. Nevirauskas’ testimony introduces the Company’s other case-in-chief witnesses and addresses the following topics: (1) PAWC’s overall management philosophy; (2) identification of the components of the Company’s rate filing that are based on the alternative ratemaking authority granted to the Commission by Act 58; (3) PAWC’s need for rate relief and the factors responsible for its revenue deficiency; (4) the source of accounting data and the test years employed by the Company; (5) the development of the Company’s combined water and wastewater revenue requirement; (6) the Company’s proposals to implement alternative

ratemaking mechanisms; (7) the effect of declining residential per customer consumption on the Company's water operating revenue; (8) the Company's recognition of changes in federal income tax law made by the Tax Cuts and Jobs Act ("TCJA") in developing its revenue requirement; (9) compliance with Act 40's provisions regarding federal income tax expense; and (10) the Company's overall management performance.

William A. Clarkson is the Vice President of Operations for PAWC. Mr. Clarkson's testimony, which is PAWC Statement No. 2, discusses: (1) the general operations of the Company; (2) the Company's commitment to maintain and enhance water quality; (3) initiatives to increase efficiency, improve service and control costs, including the continuing installation of advanced metering infrastructure; (4) employee safety and employee training and development; (5) support for employee levels; and (6) efforts to control non-revenue water.

Bruce W. Aiton is the Vice President of Engineering for PAWC. Mr. Aiton's testimony, which is PAWC Statement No. 3, discusses: (1) the Company's claim for plant additions to be placed in service during the future test year and Rate Years 1 and 2; (2) PAWC's fulfillment of main extension commitments from its 2017 base rate case; (3) operational and regulatory risks associated with the provision of public water and wastewater service; and (4) the implementation of the Company's Lead Service Line Replacement Program.

Ashley E. Everette is Director of Rates and Regulatory for AWWSC. Ms. Everette's testimony, which is PAWC Statement No. 4, discusses: (1) the Company's claimed revenues, its rate structure and rate design proposals; (2) certain specific expense items not covered by other witnesses; (3) proposed tariff changes; (4) the Company's low income assistance program; (5) the refunding of tax effects of the TCJA during the period from January 1 through June 30,

2018; and (6) the disposition of the gain associated with assets realized on the sale of the Company's former Corporate Office in Hershey, Pennsylvania.

Dr. Christina Chard is a Rate Director for AWWSC. Her testimony is set forth in PAWC Statement No. 5 and addresses the Company's claims for (1) rate base; (2) depreciation and amortization; and (3) taxes other than income and acquisitions since its last base rate case that the Company has reflected in its proposed rate base.

Stacey D. Gress is a Senior Manager for Regulatory Services for AWWSC. Her testimony is PAWC Statement No. 6 and addresses the Company's claims for (1) labor and labor-related expenses; (2) Annual Performance Plan and Long-Term Performance Plan expenses; (3) pension and other post-employment benefit ("OPEB") costs; (4) Service Company expenses; (5) inflation; (6) rate case and regulatory expenses; and (7) the allocation of expenses between water and wastewater operations.

Dominic DeGrazia is a Principal Financial Analyst for AWWSC. His testimony is PAWC Statement No. 7 and supports the Company's adjustments for (1) fuel and power; (2) waste disposal; (3) purchased water; (4) chemicals; (5) transportation; (6) insurance other than group; and (7) rent.

Bernard J. Grundusky, Jr. is Director of Business Development for PAWC. His testimony, which is PAWC Statement No. 8, describes: (1) PAWC's various acquisitions made, or pending, since the Company's last base rate case; and (2) why the Company's proposed Regionalization and Consolidation Surcharge Mechanism is necessary and appropriate.

Gregory P. Roach is Senior Director of American Water Revenue Analytics. His testimony, which is PAWC Statement No. 9, explains the adjustments required to properly reflect declining residential and commercial consumption.

John R. Wilde is Senior Director-Tax of AWWSC. His testimony, which is PAWC Statement No. 10, supports the Company's claims for Federal and state income taxes.

John J. Spanos is President of Gannett Fleming Valuation and Rate Consultants, LLC ("Gannett Fleming"). His testimony, which is PAWC Statement No. 11, explains (1) the development of the depreciated original cost of the Company's utility plant in service; and (2) its claims for annual depreciation expense.

Constance E. Heppenstall is Senior Project Manager for rate studies of Gannett Fleming. Ms. Heppenstall's testimony, which is PAWC Statement No. 12, discusses: (1) the allocation of the cost of service to customer classifications; (2) the design of tariff rates; and (3) identification of storm water related costs of service of combined sewer systems.

Ann E. Bulkley is a Senior Vice President of Concentric Energy Advisors, Inc. Her testimony, which is PAWC Statement No. 13, (1) presents her recommendation regarding the rate of return that the Company should be afforded an opportunity to earn on its rate base; and (2) assesses the reasonableness of PAWC's proposed capital structure.

The business addresses and business telephone numbers of the Company's witnesses are set forth in Appendix "A".

IV. DISCOVERY

To date, PAWC has been served with approximately 240 interrogatories² many of which contain multiple subparts. PAWC encourages informal exchanges of information and is prepared to meet with representatives of the parties to discuss issues of interest to them.

PAWC proposes that discovery should be conducted in accordance with the

² Of the 240 interrogatories served on the Company, 133 were issued by the Office of Consumer Advocate, 94 by the Bureau of Investigation and Enforcement, and 13 by Mr. and Mrs. George Lepre, Jr.

Commission's regulations at 52 Pa. Code, Chapter 5, Subchapter D, subject to the following modifications:

- (1) When an interrogatory, request for production, request for admission or motion is served after 12:00 p.m. on a Friday or the day before a holiday, the appropriate response period is deemed to start on the next business day.
- (2) Discovery requests, motions to compel and responses are to be served electronically, and paper copies will not be required.
- (3) After a Motion to Compel and Reply have been filed, if the objections that are the subject of the Motion are not resolved, counsel will alert the presiding officer by e-mail of the need for a ruling, and a conference call will be scheduled. The presiding officer may make a ruling over the telephone and not reduce it to writing unless requested to do so.

Pursuant to 52 Pa. Code § 5.341(b) and § 5.342(e), respectively, neither discovery requests and responses, nor objections to interrogatories, are to be served on the Commission or the Administrative Law Judge, although a certificate of service should be filed with the Commission's Secretary.

In addition, by separate Petition being filed contemporaneously with the Company's Prehearing Memorandum, the Company is requesting that the Administrative Law Judge enter a Protective Order to cover confidential and proprietary information and documents. As explained in the Company's Petition, the proposed Protective Order is substantially the same as Protective Orders approved in other recent base rate proceedings.³

³ *E.g., Pa. P.U.C. v. Pennsylvania-American Water Co.*, Docket No. R-2017-2595853, Protective Order – Order Granting Protective Order (June 6, 2017) (Administrative Law Judges Dennis J. Buckley and Benjamin J. Myers); *Pa. P.U.C. v. Pennsylvania-American Water Co.*, Docket No. R-2013-2355276, Protective Order – Order #5 (July 11, 2013) (Administrative Law Judges Angela T. Jones and Darlene Davis Heep); *Pa. P.U.C. v. Pennsylvania-American Water Co.*, Docket No. R-2011-2232243, Prehearing Order (July 11, 2011) (Administrative Law Judges

V. PROPOSED PROCEDURAL SCHEDULE AND PUBLIC INPUT HEARINGS

PAWC has prepared and attached as Appendix “B” to this Memorandum a proposed schedule for the submission of testimony, the conduct of evidentiary hearings, and the filing of briefs. The proposed schedule reflects the Company’s willingness to initially extend the suspension period from January 28, 2011 to February 4, 2021, subject to two conditions: (1) the right to implement new rates on an earlier effective date as the parties may agree pursuant to a settlement; and (2) the right to impose a surcharge to recoup the revenues that the Company would lose during the period from the end of the statutory suspension period through the implementation of final approved rates.⁴ Relative to the Commission’s January 14, 2021 Public Meeting, when a final order otherwise would have to be entered in this case, the Company’s proposed voluntary extension adds approximately three weeks to the procedural schedule.

PAWC believes that a specific schedule for public input hearings can most efficiently be worked out at the Prehearing Conference where, with the input of other parties, dates and times can be established. In view of the restrictions necessitated by the COVID-19 pandemic and consistent with the approach adopted in other recent cases, the Company proposes that all opportunities for public input should be conducted on-line. The Company is able to provide a communications platform (WebEx) that can be used to conduct the public input hearings with

Angela T. Jones and Eranda Vero); *Pa. P.U.C. v. Pennsylvania-American Water Co. (Wastewater)*, Docket Nos. R-2010-2166208, 2010-2166210, 2010-2166212 and 2010-2166214, Prehearing Order (July 12, 2010) (Chief Administrative Law Judge Charles E. Rainey, Jr.); *Pa. P.U.C. v. Aqua Pennsylvania, Inc.*, Docket No. R-2009-2132019, Order Granting Issuance Of Protective Order (March 16, 2010) (Administrative Law Judge Angela T. Jones).

⁴ If the Commission approved a settlement permitting new rates to become effective on or before January 28, 2021, it would not be necessary to impose a recoupment surcharge.

remote participants, pre-registration, and opportunity for video and/or audio testimony by individuals.

VI. SETTLEMENT

PAWC is willing to pursue with the parties, and encourages, the possible stipulation of individual issues or more far-ranging settlement discussions that might lead to a comprehensive resolution of this case with some or all of the parties. The Company has included in its proposed schedule dates for initial settlement conferences among the parties.

VII. CONCLUSION

Based on the evidence summarized above, it is the position of Pennsylvania-American Water Company that the rates proposed in Supplement No. 19 to Original Tariff Water – Pa. P.U.C. No. 5 and Supplement No. 19 to Original Tariff Wastewater – Pa. P.U.C. No. 16 are just, reasonable and lawful in all respects and, accordingly, the requested rate increases should be approved by the ALJs and the Commission at the close of this proceeding.

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
anthony.decusatis@morganlewis.com
brooke.mcglinn@morganlewis.com
mark.lazaroff@morganlewis.com

Susan Simms Marsh (PA I.D. No. 44689)
Elizabeth Rose Triscari (Pa. I.D. No. 306921)
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
717.550.1570 (bus)
susan.marsh@amwater.com
elizabeth.triscari@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

Dated: June 3, 2020

*Counsel for Pennsylvania-American Water
Company*

APPENDIX “A”

WITNESS CONTACT INFORMATION

NAME	BUSINESS ADDRESS	TELEPHONE NO.
Rod P. Nevirauskas	Pennsylvania-American Water Co. 852 Wesley Drive Mechanicsburg, PA 17055	717-550-1580
William A. Clarkson	Pennsylvania-American Water Co. 852 Wesley Drive Mechanicsburg, PA 17055	717-550-1540
Bruce W. Aiton	Pennsylvania-American Water Co. 852 Wesley Drive Mechanicsburg, PA 17055	717-550-1610
Ashley E. Everette	Pennsylvania-American Water Co. 852 Wesley Drive Mechanicsburg, PA 17055	717-550-1536
Dr. Christina Chard	American Water 1600 Pennsylvania Avenue Charleston, WV 25302	304-340-2077
Stacey D. Gress	American Water 1 Water Street Camden, NJ 08102	856-955-4479
Dominic DeGrazia	American Water 1 Water Street Camden, NJ 08102	856-955-4306
Bernard J. Grundusky, Jr.	Pennsylvania-American Water Co. 852 Wesley Drive Mechanicsburg, PA 17055	717-790-3024
Gregory P. Roach	American Water 555 East County Line Road, Suite 201, Greenwood, Indiana 46143	317-885-2420
John R. Wilde	American Water 1 Water Street Camden, NJ 08102	856-955-4513
John J. Spanos	Gannett Fleming Valuation and Rate Consultants, LLC 207 Senate Avenue Camp Hill, Pennsylvania 17011	717-763-7211
Constance E. Heppenstall	Gannett Fleming Valuation and Rate Consultants, LLC 207 Senate Avenue Camp Hill, Pennsylvania 17011	717-763-7211

NAME	BUSINESS ADDRESS	TELEPHONE NO.
Ann E. Bulkley	Concentric Energy Advisors, Inc. 293 Boston Post Road West, Suite 500, Marlborough, Massachusetts 01752	508-263-6216

APPENDIX “B”

PROPOSED SCHEDULE

Prehearing Conference	June 4, 2020
Public Input Hearings	July – August 2020 (Dates TBD)
Opposing Party Direct Testimony	August 6, 2020
Settlement Conference	August 12, 2020
Rebuttal Testimony (all parties)	August 28, 2020
Settlement Conference	September 9, 2020
Surrebuttal Testimony (all parties)	September 14, 2020
Evidentiary Hearings (including oral rejoinder)	September 21-25, 2020
Main Briefs due	October 15, 2020
Reply Briefs due	October 29, 2020
Public Meeting	February 4, 2021
End of Suspension Period	February 4, 2021 ¹

All dates for service of written testimony are “in hand” dates, which may be met by serving testimony electronically.

DB1/ 114255486.6

¹ The Company is proposing to extend the suspension period from January 28, 2021 to February 4, 2021, subject to the conditions set forth in Section V of its Prehearing Memorandum.