### **COMMONWEALTH OF PENNSYLVANIA**



#### OFFICE OF CONSUMER ADVOCATE

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

June 5, 2020



@pa oca



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

Via Electronic Mail Only

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

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 Counsel:

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

In accordance with the Commission's Rules of Practice and Procedure, as modified during the June 4, 2020 Prehearing Conference, we request that PAWC provide verified answers to these inquiries within ten (10) days of service on a best-efforts basis, but no later than 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:

Terry L. Fought 780 Cardinal Drive Harrisburg, PA 17111

E-Mail: OCAPAWC2020@paoca.org

Anthony C. DeCusatis, Esquire Kenneth M. Kulak, Esquire Brooke E. McGlinn, Esquire Mark A. Lazaroff, Esquire June 5, 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/ Harrison W. Breitman Harrison W. Breitman Assistant Consumer Advocate PA Attorney I.D. # 320580 E-Mail: HBreitman@paoca.org

## **Enclosures:**

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service only)
Certificate of Service
\*289730

#### CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission : Docket Nos. R-2020-3019369 (Water)

: 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 (PAWC), Set VII, 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 5<sup>th</sup> day of June 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 Elizabeth Rose Triscari, Esquire Pennsylvania-American Water Company 852 Wesley Drive Mechanicsburg, PA 17055

Joseph L. Vullo, Esquire Commission on Economic Opportunity 1460 Wyoming Avenue Forty Fort, PA 18704

Rep. Austin Davis 35<sup>th</sup> Legislative District G-07 Irvis Office Building P.O. Box 202035 Harrisburg, PA 17120-2035 Daniel G. Asmus, Esquire Erin K. Fure, Esquire Office of Small Business Advocate 555 Walnut Street 1st 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

David P. Zambito, Esquire Cozen O'Connor 17 North Second Street Suite 1410 Harrisburg, PA 17101

Senator Judith L. Schwank Senate of Pennsylvania – 11<sup>th</sup> District Senate Box 203011 Harrisburg, PA 17129

Michael L. Kurtz, Esquire Kurt J. Boehm, Esquire Jody Kyler Cohn, Esquire Boehm, Kurtz, & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202 Adeolu A. Bakare, Esquire Matthew L. Garber, Esquire McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166

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

Victoria Lozinak 609 Waterfall Way Phoenixville, PA 19460 victoriaeckman@gmail.com

William H. Rissmiller 1006 Hickory Lane Reading, PA 19606 whr19606@ptd.net

Cherise H. Sympson 203 Kittatinny Drive Bushkill, PA 18324 cherisesympson@yahoo.com

/s/ Harrison W. Breitman
Harrison W. Breitman
Assistant Consumer Advocate
PA Attorney I.D. # 320580
E-Mail: HBreitman@paoca.org

Lauren E. Guerra Assistant Consumer Advocate PA Attorney I.D. # 323192 E-Mail: 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: June 5, 2020

\*289728

Anna-Maria Rucci 1029 Drexel Hills Blvd. New Cumberland, PA 17070 bropdu@yahoo.com

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

Charles and Jennifer Spryn 899 Bullcreek Road Butler, PA 16002 sprynhouse@live.com

David Dollard 5220 Hilltop Circle East Stroudsburg, PA 18301 David@kpmedi.com

Jan K. Vroman 623 Eastman Street Westmifflin, PA 15122 jan.vroman@yahoo.com

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

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