

COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION COMMONWEALTH KEYSTONE BUILDING 400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF INVESTIGATION & ENFORCEMENT

June 25, 2020

Via Electronic Mail

Kenneth M. Kulak, Esq. 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) and R-2020-3019371 (Wastewater)

I&E Interrogatories

Enclosed please find a copy of the Bureau of Investigation and Enforcement's (I&E) **Interrogatories RE (nos. 28-60)** – **Wilson**. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to these Interrogatories are due within fifteen (15) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please provide your responses to me via email at the email address listed below.

Copies are being served on parties of record per the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic Service.* Should you have any questions, please do not hesitate to contact me.

Sincerely,

Carrie B. Wright

Prosecutor

Bureau of Investigation and Enforcement

Carri B WHIZEX

PA Attorney ID No. 208185

(717) 783-6156

carwright@pa.gov

CBW/ac Enclosures

cc: Secretary Rosemary Chiavetta (Cover Letter and Certificate of Service only – via efile)
Per Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :

:

v. : Docket Nos.: R-2020-3019369 (Water)

R-2020-3019371 (Wastewater)

Pennsylvania American Water Company

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing Interrogatories dated June 25,

2020, in the manner and upon the persons listed below:

Served via Electronic Mail Only

Kenneth M. Kulak, Esq.
Anthony C. DeCusatis, Esq.
Brooke E. McGlinn, Esq.
Mark A. Lazaroff, Esq.

Ria M. Pereira, Esq.
John W. Sweet, Esq.
Elizabeth R. Marx, Esq.
Pennsylvania Utility Law Project

Morgan Lewis & Bockius LLP 118 Locust Street

1701 Market Street Harrisburg, PA 17101 Philadelphia, PA 19103-2921 <u>pulp@palegalaid.net</u>

ken.kulak@morganlewis.com
Counsel for CAUSE-PA

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

<u>mark.lazaroff@morganlewis.com</u> Adeolu A. Bakare, Esq. Counsel for PAWC McNees Wallace & Nurick

100 Pine Street

Harrisburg, PA 17101
David P. Zambito, Esq.

<u>abakare@mcneeslaw.com</u>

Cozen O'Connor Counsel for Pennsylvania-American

17 North Second Street, Suite 1410 Large User Group

Harrisburg, PA 17101 dzambito@cozen.com

Counsel for PAWC David F. Boehm, Esq. Kurt J. Boehm, Esq.

Susan Simms Marsh, Esq.

Susan Simms Marsh, Esq.

Boehm, Kurtz & Lowry

Elizabeth Rose Triscari, Esq. 36 East Seventh Street, Suite 1510

Pennsylvania-American Water Company
852 Wesley Drive
Cincinnati, OH 45202
dboehm@bkllawfirm.com

Mechanicsburg, PA 17055 <u>kboehm@bkllawfirm.com</u> <u>susan.marsh@amwater.com</u> <u>jkylercohn@bkllawfirm.com</u>

<u>elizabeth.triscari@amwater.com</u> Counsel for AK Steel

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

Christine Maloni Hoover, Esq. Erin L. Gannon, Esq. Lauren E. Guerra, Esq. Harrison W. Breitman, Esq. Office of Consumer Advocate Forum Place 555 Walnut Street, 5th Floor Harrisburg, PA 17101-1923 OCAPAWC2020@paoca.org

Erin K. Fure, Esq.
Daniel G. Asmus, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
efure@pa.gov
dasmus@pa.gov

Barbara R. Alexander
Barbara Alexander Consulting LLC
83 Wedgewood Drive
Winthrop, ME 04364
OCAPAWC2020@paoca.org
Consultant for OCA

Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815
OCAPAWC2020@paoca.org
Consultant for OCA

Roger D. Colton Fisher, Sheehan & Colton 34 Warwick Road Belmont, MA 02478 OCAPAWC2020@paoca.org Consultant for OCA

Carrie B. Wright

Prosecutor

Bureau of Investigation and Enforcement PA Attorney ID No. 208185