



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

July 16, 2020

Via Electronic Mail

Susan Simms Marsh, Esq.
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
susan.marsh@amwater.com

Re: Pennsylvania Public Utility Commission v.
Pennsylvania American Water Company
Docket Nos. R-2020-3019369 (Water) and R-2020-3019371 (Wastewater)
I&E Data Requests - CORRECTED

Dear Attorney Marsh:

Enclosed please find the Bureau of Investigation & Enforcement's (I&E) **CORRECTED Data Requests I&E-RB (nos 41-D through 53-D) – Gilliland**, *that replace I&E Data Requests I&E-RB (nos 38-D through 50-D) – Gilliland, sent previously.*

Please restate each Data Request before responding and start each Data Request and response on a separate page. The responses should identify the responding person(s).

The responses to these Data Requests are due within fifteen (15) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please provide your responses and forward them via email to carwright@pa.gov.

Consistent with Paragraph 8 of the Commission's March 20, 2020 Emergency Order at Docket No. M-2020-3019262 (Re: Suspension of Regulatory and Statutory Deadlines; Modification to Filing and Service Requirements), electronic copies only are being served on all active parties of record as evidenced in the attached Certificate of Service. If you have any questions, please contact me at (717) 783-6156.

Sincerely,

Carrie B. Wright
Prosecutor
Bureau of Investigation & Enforcement
PA Attorney ID No. 208185
(717) 783-6156
carwright@pa.gov

CBW/jfm
Enclosures

cc: Secretary Rosemary Chiavetta (*via e-file, cover letter and Certificate of Service Only*)
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 **Data Requests** dated July 16, 2020, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

Served via Electronic Mail Only

Susan Simms Marsh, Esq.
Elizabeth Rose Triscari, Esq.
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
susan.marsh@amwater.com
elizabeth.triscari@amwater.com

Adeolu A. Bakare, Esq.
Jo-Anne Thompson, Esq.
McNees Wallace & Nurick
100 Pine Street
Harrisburg, PA 17101
abakare@mcneeslaw.com
jthompson@mcneeslaw.com
*Counsel for Pennsylvania-American
Large User Group*

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

Kenneth M. Kulak, Esq.
Anthony C. DeCusatis, Esq.
Brooke E. McGlinn, Esq.
Mark A. Lazaroff, Esq.
Morgan Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
ken.kulak@morganlewis.com
anthony.decusatis@morganlewis.com
brooke.mcglinn@morganlewis.com
mark.lazaroff@morganlewis.com
Counsel for PA American Water Co

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
OCAPAWC2020@paoca.org

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

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

David P. Zambito, Esq.
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
dzambito@cozen.com
Counsel for PAWC

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
Bloomsburgh, 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

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



Carrie B. Wright
Prosecutor
PA Attorney ID No. 208185