COMMONWEALTH OF PENNSYLVANIA



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

August 12, 2020



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 XIII, 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:

Ralph C. Smith Larkin & Associates, PLLC 15728 Farmington Road Livonia, MI 48154 E-Mail: <u>OCAPAWC2020@paoca.org</u> Anthony C. DeCusatis, Esquire Kenneth M. Kulak, Esquire Brooke E. McGlinn, Esquire Mark A. Lazaroff, Esquire August 12, 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).

Respectfully submitted,

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

Enclosures:

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

*293910

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission	: Docket Nos	s. R-2020-3019369 (Water)
V.	:	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 XIII, 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 12th day of August 2020.

SERVICE BY E-MAIL ONLY

Carrie B. Wright, Esquire Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd 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

Michael L. Kurtz, Esquire Kurt J. Boehm, Esquire Jody Kyler Cohn, Esquire Boehm, Kurtz, & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, OH 45202 Daniel G. Asmus, Esquire Erin K. Fure, Esquire Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101-1923

Adeolu A. Bakare, Esquire Jo-Anne S. Thompson, Esquire McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166

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

Elizabeth R. Marx, Esquire Ria M. Pereira, Esquire John W. Sweet, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 Joseph L. Vullo, Esquire Commission on Economic Opportunity 1460 Wyoming Avenue Forty Fort, PA 18704

Jessica and Jeffrey LaBarge 123 Fairmount Avenue Reading, PA 19606 jessi@russolawllc.com Jan K. Vroman 623 Eastman Street West Mifflin, PA 15122 jan.vroman@yahoo.com

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

<u>/s/ Harrison W. Breitman</u> Harrison W. Breitman Assistant Consumer Advocate PA Attorney I.D. # 320580 E-Mail: HB<u>reitman@paoca.org</u>

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

Lauren E. Guerra Assistant Consumer Advocate PA Attorney I.D. # 323192 E-Mail: <u>LGuerra@paoca.org</u> Christine Maloni Hoover Senior Assistant Consumer Advocate PA Attorney I.D. # 50026 E-Mail: <u>CHoover@paoca.org</u>

Christy M. Appleby Assistant Consumer Advocate PA Attorney I.D. # 85824 E-Mail: <u>CAppleby@paoca.org</u>

Counsel for: Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 Phone: (717) 783-5048 Fax: (717) 783-7152 Dated: August 12, 2020 *293909