

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

 @pa\_oca

 /pennoca

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

August 17, 2020

**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 XVI, 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:

Barbara R. Alexander  
Barbara Alexander Consulting LLC  
83 Wedgewood Drive  
Winthrop, ME 04364  
E-Mail: [OCAPAWC2020@paoca.org](mailto:OCAPAWC2020@paoca.org)

Anthony C. DeCusatis, Esquire  
Kenneth M. Kulak, Esquire  
Brooke E. McGlenn, Esquire  
Mark A. Lazaroff, Esquire  
August 17, 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,

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

Enclosures:

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

\*294181

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission : Docket Nos. 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 XVI, 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 17<sup>th</sup> 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, 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

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  
1<sup>st</sup> 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](mailto:jessi@russolawllc.com)

Brian Kalcic  
Excel Consulting  
225 S. Meramec Avenue  
Suite 720 T  
St. Louis, MO 63105

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

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

Lauren E. Guerra  
Assistant Consumer Advocate  
PA Attorney I.D. # 323192  
E-Mail: [LGuerra@paoca.org](mailto:LGuerra@paoca.org)

Jan K. Vroman  
623 Eastman Street  
West Mifflin, PA 15122  
[jan.vroman@yahoo.com](mailto:jan.vroman@yahoo.com)

Charles and Jennifer Spryn  
899 Bullcreek Road  
Butler, PA 16002  
[sprynhouse@live.com](mailto:sprynhouse@live.com)

Christine Maloni Hoover  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 50026  
E-Mail: [CHoover@paoca.org](mailto:CHoover@paoca.org)

Christy M. Appleby  
Assistant Consumer Advocate  
PA Attorney I.D. # 85824  
E-Mail: [CAappleby@paoca.org](mailto:CAappleby@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: August 17, 2020  
\*294180