



November 20, 2020

VIA E-File

The Honorable Conrad A. Johnson
Administrative Law Judge
Pennsylvania Utility Commission
Piatt Place, Suite 220
301 5th Avenue
Pittsburgh, PA 15222
cojohnson@pa.gov

Re: **Pa. PUC v. Pennsylvania American Water Company,**
Docket Nos. R-2020-3019369 (Water); R-2020-3019371 (Wastewater)
Objections of CAUSE-PA to the Joint Petition for Non-Unanimous Settlement

Dear Judge Johnson,

Please find the attached **Objections of CAUSE-PA to the Joint Petition for Non-Unanimous Settlement of Rate Investigation.**

Pursuant to the Commission's Emergency Order issued on March 20, 2020, and as indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "John W. Sweet", with a stylized flourish at the end.

John W. Sweet, Esq.
Counsel for CAUSE-PA

CC: *Rosemary Chiavetta, Secretary*
Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2020-3019369
	:	R-2020-3019371
Pennsylvania American Water Company	:	

**OBJECTIONS OF CAUSE-PA TO THE JOINT PETITION FOR NON-UNANIMOUS
SETTLEMENT OF RATE INVESTIGATION**

Pursuant to the provisions of the Rules of Practice and Procedure of the Pennsylvania Public Utility Commission (PUC or Commission), 52 Pa. Code § 5.232, and the Third Interim Order issued November 5, 2020 by the Honorable Administrative Law Judge Conrad A. Johnson in this proceeding, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), through its counsel at the Pennsylvania Utility Law Project, hereby files these Objections to the Joint Petition for Non-Unanimous Settlement of Rate Investigation filed by Pennsylvania-American Water Company (PAWC), the Commission's Bureau of Investigation and Enforcement (I&E), and Pennsylvania-American Water Large User Group (PAWLUG) (collectively Joint Petitioners) on October 30, 2020 (Joint Petition or Settlement). As explained below, CAUSE-PA objects to the Settlement and in support thereof asserts the following:

I. BACKGROUND

On October 30, 2020, PAWC, PAWLUG, and I&E submitted a Joint Petition for Non-Uniform Settlement of Rate Investigation (Settlement). In the Settlement, the Joint Petitioners agreed that, upon the Commission's approval of the Settlement, but no later than January 28, 2021, PAWC will be permitted to charge rates for water and wastewater services in order to produce additional annual water and wastewater operating revenue of \$70.5 million.¹ The \$70.5 million increase will be offset by an annualized credit of \$10.5 million in 2021 and 2022 beginning on the effective date of the Settlement Rates.²

Pursuant to the Settlement, the total net increase will be implemented in two installments: 1) a net increase of \$40 million on the effective date of the Settlement Rates; and 2) a second installment effective on January 1, 2022 that increases base rates by \$70.5 million, which will be off-set by a credit of \$10.5 million, for a net total increase of \$60 million for twelve months ending December 31, 2022. This credit will then cease to apply January 28, 2023, and PAWC will begin recovering the full \$70.5 million annual revenue increase.³ From a consumer perspective, rates will increase precipitously each year for three years.

CAUSE-PA objects to the Joint Petition, as it will impose an unreasonable, unjust, and categorically unaffordable rate increase on top of already unaffordable rates. As discussed in further detail in its Main Brief and Reply Brief, CAUSE-PA opposes any rate increase at the present time, given the continued health and economic devastation caused by the COVID-19

¹ Settlement at 8.

² Id. at 8-9.

³ Id. at 9.

pandemic.⁴ Economic recovery is likely to be slow and long-term, with many projecting that the economic outlook will get even worse before it begins to look better. Allowing a rate increase that would be designed to procure additional annual water and wastewater revenues of \$70.5 million – even in a staged manner as proposed in the Settlement - would substantially increase the cost of essential and life-sustaining water and wastewater services in the midst of a public health and economic crisis, the full range and impact of which is yet to be fully known or understood.

II. ARGUMENT

It is neither just nor reasonable to precipitously raise rates for essential, life-sustaining water and wastewater services in the midst of an unprecedented pandemic that has profoundly impacted the health and economic well-being of customers throughout the country and across PAWC's service territory.⁵ Many low income Pennsylvanians were already struggling to make ends meet before the pandemic.⁶ The COVID-19 pandemic has caused unprecedented levels of economic devastation and has disproportionately affected low income households.⁷ It is unclear when and if Pennsylvania's households will begin to financially recover.⁸ Given the continued and potentially long-term impact of COVID-19 on people's lives and livelihoods, and need for consumers to maintain water and wastewater services to help stop the spread of the pandemic, it is inappropriate to raise rates for water and wastewater services at this time.

⁴ CAUSE-PA MB at 13-24.

⁵ CAUSE-PA St. 1 at 8: 6-9.

⁶ See CAUSE-PA MB at 10-11.

⁷ CAUSE-PA St. 1 at 7: 9-17; CAUSE-PA MB at 13.

⁸ CAUSE-PA St. 1 at 44: 22-23; 45: 1-2.

The Commission has a “duty to set ‘just and reasonable’ rates, reflecting a balance of consumer and investor interests.”⁹ In determining just and reasonable rates, the PUC has discretion to determine the proper balance between interests of ratepayers and utilities.¹⁰ “[T]he PUC is obliged to consider broad public interests in the rate-making process.”¹¹

[T]he term “just and reasonable” was not intended to confine the ambit of regulatory discretion to an absolute or mathematical formulation but rather to confer upon the regulatory body the power to make and apply policy concerning the appropriate balance between prices charged to utility customers and returns on capital.¹²

In order to be just and reasonable, it is critical that rates are also affordable for those served.¹³ Indeed, universal accessibility is a polestar principle of ratemaking for essential, life-sustaining services like water and wastewater. The rate increase proposed in the Joint Petition threatens to price low income consumers out of the market, which is neither just nor reasonable; thus, the Settlement should not be approved.

For low income customers, the rate increase proposed in the Settlement will have an immediate and profound impact on their ability to afford and stay connected to service. As CAUSE-PA’s expert witness Mitchell Miller – former Director of the Commission’s Bureau of Consumer Services – explained in direct testimony, there are a substantial number of low income consumers in PAWC’s service territory.¹⁴ With the exception of consumers actively participating in PAWC’s H2O program, which currently reaches just 3.3% (22,608) of its residential customers,

⁹ Popowsky v. Pa. PUC, 542 Pa. 99, 107-108 (1995) (emphasis added); 66 Pa. C.S. § 1301.

¹⁰ Id. citing Pa. PUC v. Philadelphia Electric Co., 522 Pa. 338, 342-43, 561 A.2d 1224, 1226 (1989); Pa. PUC v. Pa. Gas & Water Co., 492 Pa. 326, 337, 424 A.2d 1213, 1219 (1980), cert. denied, 454 U.S. 824, 102 S. Ct. 112, 70 L. Ed. 2d 97 (1981)).

¹¹ Id. citing Pa. Elec. Co. v. Pa. PUC, 509 Pa. 324, 331, 502 A.2d 130, 134 (1985).

¹² Id.

¹³ CAUSE-PA St. 1 at 8:10.

¹⁴ CAUSE-PA St. 1 at 13-17.

PAWC does not otherwise track its low income customers – even if they are enrolled in an income based payment arrangement.¹⁵ Nevertheless, Mr. Miller conservatively estimated that approximately 20% of PAWC’s residential customers – or roughly 123,162 households – likely have incomes at or below 150% FPL and would be eligible for assistance.¹⁶

Low income consumers have been particularly hard hit by the economic repercussions of COVID-19, and low wage and hourly workers have experienced the highest levels of job losses and reductions of workforce.¹⁷ Half of adults in households with incomes of less than \$25,000 who lost employment income as a result of COVID-19 lacked confidence if they could pay the next month’s rent or mortgage on time, compared with 8.4% of adults in households with an income of \$100,000 or more.¹⁸ More than 2 million Pennsylvanians have sought unemployment benefits since mid-March.¹⁹ Mr. Miller noted that, as a result of these deep economic disruptions, the number of low income customers in PAWC’s service territory is likely substantially higher than the estimated 20% of PAWC’s residential customers.²⁰

Even during relatively good economic times, low income customers have profoundly struggled to afford and maintain services at current rates.²¹ For context, a family of four at 150%

¹⁵ Id. at 33.

¹⁶ Id. at 15: 3-6.

¹⁷ CAUSE-PA St. 1 at 7: 15-17, citing Parker, Kim, About Half of Lower-Income Americans Report Household Job or Wage Loss Due to COVID-19, Pew Research Center (April 21, 2020), available at <https://www.pewsocialtrends.org/2020/04/21/about-half-of-lower-income-americans-report-household-job-or-wage-loss-due-to-covid-19/>.

¹⁸ CAUSE-PA St. 1 at 8: 1-3, citing Brian Mendez-Smith, Mark Klee, Census Bureau’s New Household Pulse Survey Shows Who Is Hardest Hit During COVID-19 Pandemic, US Census Bureau (June 29, 2020), available at <https://www.census.gov/library/stories/2020/06/low-income-and-younger-adults-hardest-hit-by-loss-of-income-during-covid-19.html>

¹⁹ CAUSE-PA St. 1 at 16: 11-12.

²⁰ Id. at 16: 12-15.

²¹ Id. at 22: 5-13

FPL has a gross annual income of just \$39,300, while a family of four at 50% FPL has a gross annual income of just \$13,100.²² These household incomes are scant in comparison to how much a household needs to meet their basic expenses in any of the counties in PAWC’s service territory.²³ The average Self Sufficiency Standard (the income a necessary to meet basic needs without public subsidies) in PAWC’s service territory for a family of four with two adults and two school aged children is approximately \$63,081.05 per year – far higher than the income of households at or below the federal poverty level.²⁴ In testimony, CAUSE-PA witness Mitchell Miller estimated that the average annual household income for the Company’s confirmed low income customers – its H2O participants – is just \$14,283.²⁵ Mr. Miller explained that this is significantly less than the amount needed to be self-sufficient in PAWC’s service territory and that “[a]ny increase in the cost of necessities, including the rates for water and wastewater service, will result in increased unaffordability for low and moderate income households, and will likely result in a corresponding increased rate of uncollectible expenses, service termination, and associated hardships.”²⁶

At existing rates, low income consumers already face steep rates for essential water and wastewater service – even with assistance through PAWC’s H2O program. As Mr. Miller explained, low income consumers – especially those with the lowest level of income and the

²² Id. at 18: 7-14.

²³ Id. citing Self Sufficiency Standard, <http://www.selfsufficiencystandard.org/Pennsylvania>.

²⁴ Id. at 19: 1-6, citing Average Self Sufficiency Standard of all 37 Pennsylvania counties served by PAWC for a four-person household that includes two adults and two school aged children. See 2020 Pennsylvania Sufficiency Standard, available at <http://www.selfsufficiencystandard.org/Pennsylvania>.

²⁵ CAUSE-PA St. 1 at 19: 7-19, citing CAUSE-PA to PAWC VI-1.

²⁶ Id. at 19: 11-14.

highest usage rates – already often pay upwards of 10% or more of their gross annual income for water and wastewater service at existing rates.²⁷

Table 1 shows the current water burden for average usage customers at 50, 100, and 150% FPL:

TABLE 1 – Low Income Water Burdens at Current Rates²⁸

	50% FPL HHD of 2 \$718	50% FPL HHD of 4 \$1,092	100% FPL HHD of 2 \$1,437	100% FPL HHD of 4 \$2,183	150% FPL HHD of 2 \$2,155	150% FPL HHD of 4 \$3,275
Zone 1 \$57.85	8.1%	5.3%	4%	2.7%	2.7%	1.8%
Zone 2 \$46.90	6.5%	4.3%	3.3%	2.1%	2.2%	1.4%
Zone 3 \$33.28	4.6%	3%	2.3%	1.5%	1.5%	1%
Zone 4 \$45.40	6.3%	4.2%	3.2%	2.1%	2.1%	1.4%
Zone 5 \$29.30	4.1%	2.7%	2%	1.3%	1.4%	0.9%

Table 2 shows the current wastewater burdens for average usage customers at 50, 100, 150% FPL:

²⁷ CAUSE-PA St. 1 at 27-28, T. 4 & T.5.

²⁸ Id. at T.4.

TABLE 2 – Low Income Wastewater Burdens at Current Rates²⁹

	50% FPL HHD of 2 \$718	50% FPL HHD of 4 \$1,092	100% FPL HHD of 2 \$1,437	100% FPL HHD of 4 \$2,183	150% FPL HHD of 2 \$2,155	150% FPL HHD of 4 \$3,275
Zone 1 \$60.42	8.4%	5.5%	4.2%	2.8%	2.8%	1.8%
Zone 2 \$44.58	6.2%	4.1%	3.1%	2.0%	2.1%	1.4%
Zone 3 \$40.55	5.6%	3.7%	2.8%	1.9%	1.9%	1.2%
Zone 4 \$50.87	7.1%	4.7%	3.5%	2.3%	2.4%	1.6%
Zone 5 Franklin \$72.80	10.1%	6.7%	5.1%	3.3%	3.4%	2.2%
Zone 5 Franklin-S \$52.93	7.4%	4.8%	3.7%	2.4%	2.5%	1.6%
Zone 6 McKeesport \$51.75	7.2%	4.7%	3.6%	2.4%	2.4%	1.6%
Zone 6 Port Vue \$41.82	5.8%	3.8%	2.9%	1.9%	1.9%	1.3%
Zone 7 \$74.03	10.3%	6.8%	5.2%	3.4%	3.4%	2.3%
Zone 8 \$52.04	7.2%	4.8%	3.6%	2.4%	2.4%	1.6%
Zone 9 \$42.72	5.9%	3.9%	3.0%	2.0%	2.0%	1.3%
Kane \$50.73	7.1%	4.6%	3.5%	2.3%	2.4%	1.5%
Delaware \$95.52	13.3%	8.7%	6.6%	4.4%	4.4%	2.9%

²⁹ Id. at T.5.

PAWC's H2O program does little to decrease this already unacceptably high water and wastewater burden, with many still facing a combined water and wastewater burden in excess of 10% or more of gross household income.³⁰ This leaves very little for a family to pay for rent, electricity, heat, food, medicine, and other basic human needs.

Table 3 shows the current water burdens for H2O participants at 50, 100, and 150% FPL at proposed rates (using current average usage levels and federal poverty levels):

Table 3 - Current H2O Water Burdens³¹

	50% FPL HHD of 2 \$718	50% FPL HHD of 4 \$1,092	100% FPL HHD of 2 \$1,437	100% FPL HHD of 4 \$2,183	150% FPL HHD of 2 \$2,155	150% FPL HHD of 4 \$3,275
Zone 1 \$44.05	6.1%	4.0%	3.1%	2.0%	2.0%	1.3%
Zone 2 \$33.09	4.6%	3.0%	2.3%	1.5%	1.5%	1.0%
Zone 3 \$19.47	2.7%	1.8%	1.4%	0.9%	0.9%	0.6%
Zone 4 \$10.52	1.5%	1.0%	0.7%	0.5%	0.5%	0.3%
Zone 5 \$16.74	2.3%	1.5%	1.2%	0.8%	0.8%	0.5%

Table 4 shows the current water burdens for H2O participants at 50, 100, and 150% FPL at proposed rates (using current average usage levels and federal poverty levels):

³⁰ Id. at 34-35, T.9 & T.10.

³¹ Id. at T.9.

Table 4 – Current H2O Wastewater Burdens³²

	50% FPL HHD of 2 \$718	50% FPL HHD of 4 \$1,092	100% FPL HHD of 2 \$1,437	100% FPL HHD of 4 \$2,183	150% FPL HHD of 2 \$2,155	150% FPL HHD of 4 \$3,275
Zone 1 \$48.33	6.7%	4.4%	3.4%	2.2%	2.2%	1.5%
Zone 2 \$35.66	5.0%	3.3%	2.5%	1.6%	1.7%	1.1%
Zone 3 \$32.43	4.5%	3.0%	2.3%	1.5%	1.5%	1.0%
Zone 4 \$40.70	5.7%	3.7%	2.8%	1.9%	1.9%	1.2%
Zone 5 Franklin \$58.24	8.1%	5.3%	4.1%	2.7%	2.7%	1.8%
Zone 5 Franklin-S \$42.35	5.9%	3.9%	2.9%	1.9%	2.0%	1.3%
Zone 6 McKeesport \$41.40	5.8%	3.8%	2.9%	1.9%	1.9%	1.3%
Zone 6 Port Vue \$33.46	4.7%	3.1%	2.3%	1.5%	1.6%	1.0%
Zone 7 \$59.22	8.2%	5.4%	4.1%	2.7%	2.7%	1.8%
Zone 8 \$41.63	5.8%	3.8%	2.9%	1.9%	1.9%	1.3%
Zone 9 \$34.18	4.8%	3.1%	2.4%	1.6%	1.6%	1.0%
Kane \$40.58	5.7%	3.7%	2.8%	1.9%	1.9%	1.2%
Delaware \$76.42	10.6%	7.0%	5.3%	3.5%	3.5%	2.3%

³² Id. at T.10.

Increasing rates will further exacerbate this affordability crisis, and is likely to cause increased terminations to economically vulnerable consumers or, alternatively, will cause these customers to go without other critical necessities in order to keep up with PAWC's inflated cost of services.³³ H2O participants already have markedly higher rates of termination than residential customers as a whole, comprising 14.9% of PAWC's total 28,300 terminations, despite comprising only 3.3% of total residential water and wastewater customers.³⁴ As discussed in CAUSE-PA's Main Brief and Reply Brief, the structure, design, and delivery of PAWC's H2O program is inadequate to address existing unaffordability. Increasing rates without addressing deep unaffordability issues will exacerbate these disproportionately high low income termination rates – especially given the increased number of consumers struggling to make ends meet as a result of the global pandemic. This effect would be neither just nor reasonable and would place low income household and their surrounding communities at substantial risk of harm.

There is a tangible link between water services and household health and well-being. Households with the financial means to pay for water and wastewater services will do so, given the serious ramifications of going without services, especially during the pendency of the COVID-19 pandemic.³⁵ In his direct testimony, Mr. Miller described the serious and far-ranging consequences that result from the termination of water and wastewater service:

[T]ermination of service to the home can jeopardize a parent's custody of his/her children, can cause a home to be condemned, and is often cited as a cause of evictions from private and public housing - leading to increased rates of homelessness. To look at this from another angle, consistent and affordable access to water and wastewater services has shown to have numerous benefits to communities as a whole. Having affordable access to such services has been linked

³³ CAUSE-PA St 1 at 31: 4-16.

³⁴ CAUSE-PA St. 1 at 31: 8-13, citing CAUSE-PA to PAWC I-21, Attach. (22,090 H2O participants as of Dec. 2020); see also CAUSE-PA to PAWC I-19, Attach. (69,223 residential sewer and 615,811 residential water customers as of Dec. 2020).

³⁵ CAUSE-PA St. 1 at 23: 4-8.

to healthier child development, decreasing homelessness, and improving affordability of public and private housing.³⁶

Again, the need to access safe and affordable water and wastewater services has been amplified as a result of COVID-19.³⁷ Without running water, people cannot follow the most consistent guidance to guard against COVID-19 – to wash your hands and sanitize surfaces.³⁸ Basic daily tasks of livings, such as cooking, cleaning, flushing the toilet, and brushing teeth, become impossible if water and wastewater services are terminated.³⁹ Lack of consistent water and wastewater services poses a significant threat to health and safety and is especially dangerous to vulnerable consumers, including seniors and individuals living with underlying health issues who are more susceptible to health complications as a result of loss of service.⁴⁰

In his direct testimony, Mr. Miller recommended against raising rates in the midst of the COVID-19 pandemic.⁴¹ He explained that it is unknown when and if Pennsylvania’s households will begin to financially recover from the pandemic and that we “are experiencing unprecedented levels of economic devastation as a result of the COVID-19 pandemic, which are likely to continue and may in fact worsen over the long term.”⁴² Mr. Miller further explained:

The full impact of COVID-19 on people’s lives and livelihoods is still unknown. However, it is clear that COVID-19 will have lasting impacts on the economy that cannot be adequately accounted for in the current rate proceeding. With such profound uncertainties, now is not the time to raise rates for water and wastewater services – services that directly impact whether consumers can remain safely in their homes and exercise necessary hygiene to protect against COVID-19.⁴³

³⁶ Id. at 23: 9-15 (internal citations omitted).

³⁷ CAUSE-PA St. 1 at 24: 9-10.

³⁸ Id. at 24: 9-11.

³⁹ Id. at 25: 1-5.

⁴⁰ Id.

⁴¹ CAUSE-PA St. 1 at 44: 6-10.

⁴² Id. at 7: 12-13.

⁴³ Id. at 8: 4-9.

As Mr. Miller noted in his direct testimony, rates are not just and reasonable if they are not affordable.⁴⁴ Thus, the substantial rate increase proposed in the Joint Petition should be denied and the Settlement should be rejected.

CAUSE-PA recognizes and appreciates that the Joint Petition contains some additional protections and customer assistance. However, these proposals are wholly inadequate to mitigate the substantial rate increase proposed in the Settlement – on top of the economic devastation associated with the COVID-19 pandemic. The Settlement includes a few limited pandemic-related measures.⁴⁵ Specifically, the Settlement waives reconnection fees for customers at or below 200% FPL for one year from the date of the final Order; waives the Hardship Fund good faith payment requirements for one year from the date of the final Order; allows self-certification of income for the Hardship Fund until the earlier of March 31, 2021 or the date on which the Executive Order is rescinded; expands community outreach; and increases PAWC’s annual contribution of the Hardship Fund by just \$150,000 – for a *total* budget of \$500,000 for water and \$100,000 for wastewater assistance grants.⁴⁶ These combined measures pale in comparison to the overwhelming need. As of September 2020, PAWC’s residential customers owed over \$31.7 million – up from \$22.8 million year over year.⁴⁷ An additional \$150,000 in hardship fund grants is just a drop in this ocean of unaffordability, and will do little to help address this unfolding utility debt crisis – let alone the additional hardship that will fall on residential consumers if rates are increased sharply, year after year, for the next three years.

⁴⁴ Id. at 8: 10.

⁴⁵ See Settlement at 11-13.

⁴⁶ Id. at 11-12.

⁴⁷ Public Utility Service Termination Proclamation of Disaster Emergency – COVID-19, PUC Docket No. M-2020-3019244, Responses of PAWC to the PUC’s Request for Data (filed October 15, 2020).

Given the considerable rate increase in the Joint Petition, the proposed Settlement is inadequate to ensure that consumers can access and maintain water and wastewater service, which is absolutely critical to the health and safety of individuals and the broader community. In addition to allowing rates to increase dramatically over the next three years, the Settlement also fails to set forth meaningful improvements to PAWC's low income programming, as it does not provide for changes to the structure of PAWC's H2O bill discount to remediate unaffordability within the program or disparities in the distribution of benefits – nor does it provide for any mechanism for H2O participants to address arrears accrued prior to entry into the discount program.⁴⁸ PAWC's economically vulnerable customers were already struggling to maintain water and wastewater to their home under existing rates, and prior to profound economic impact of the pandemic.⁴⁹ In recent months, that struggle has increased exponentially, as low income customers have been particularly hard-hit by the pandemic. Low wage workers have experienced profound wage and job losses, while residential consumers have experienced increased usage from spending more time at home to prevent further spread of the virus.⁵⁰

It is for all of these reasons, and as more thoroughly detailed in CAUSE-PA's Main and Reply Briefs, that CAUSE-PA strongly opposes the non-unanimous Settlement between the Joint Petitioners and urges ALJ Johnson and the Commission to reject PAWC's rate increase and implement the critical changes and improvements outlined in these Objections and CAUSE-PA's Main Brief and Reply Brief in order to remediate current unacceptable levels of unaffordability and help customers maintain critical water and wastewater services to their home. Water and

⁴⁸ See id. at 12-13.

⁴⁹ See CAUSE-PA MB at 10-11.

⁵⁰ See, e.g., CAUSE-PA St. 1 at 44: 16-20.

wastewater has always been critically important to the health and safety of Pennsylvanians, but is particularly critical now to prevent further spread of the virus and ensure that families remain safe in their home.

III. CONCLUSION

CAUSE-PA respectfully requests that ALJ Johnson and the Commission to deny the Joint Petition and order PAWC to adopt the recommendations of CAUSE-PA outlined in its Main and Reply Briefs. These recommendations are critical to appropriately address the unaffordability of PAWC's current rates.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT

Counsel for CAUSE-PA



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November 20, 2020

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2020-3019369
	:	R-2020-3019371
Pennsylvania American Water Company	:	

Certificate of Service

I hereby certify that I have this day served copies of the **Objections of CAUSE-PA to the Joint Petition for Non-Unanimous Settlement of Rate Investigation** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 and consistent with the Commission's Emergency Order issued on March 20, 2020.

VIA EMAIL ONLY

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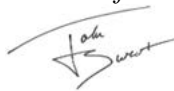
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Respectfully Submitted,
PENNSYLVANIA UTILITY LAW PROJECT
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A handwritten signature in black ink, appearing to read "John W. Sweet", with a stylized flourish above the name.

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