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March 14, 2012

VIA UPS Overnight Mail

**RECEIVED**

MAR 15 2012

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

Re: Utility Workers Union of America System Local 537 v.  
Pennsylvania-American Water Company  
Docket No. C-2012-2287204

Dear Secretary Chiavetta:

On behalf of Pennsylvania-American Water Company, I am forwarding an original and three (3) copies of Pennsylvania-American Water Company's Objections to Interrogatories and Requests for Production of Documents, Set I.

As evidenced by the attached Certificate of Service, all parties to this proceeding have been duly served.

Respectfully,

Susan Simms Marsh  
Corporate Counsel

Attachments

cc: Ember Jandebaur, Administrative Law Judge w/Attachments  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

UTILITY WORKERS UNION OF AMERICA :  
SYSTEM LOCAL 537, :  
Complainant :

v. :

PENNSYLVANIA-AMERICAN WATER :  
COMPANY, :  
Respondent :

DOCKET NO. C-2012-2287204

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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**PENNSYLVANIA-AMERICAN WATER COMPANY'S  
OBJECTIONS TO INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
OF UTILITY WORKERS UNION OF AMERICA SYSTEM LOCAL 537  
SET I**

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Pennsylvania-American Water Company ("Respondent" or "PAWC"), through its attorney, submits the following Objections to Interrogatories and Requests for Production of Documents of Utility Workers of America System Local 537 Set I.

**GENERAL OBJECTIONS**

The Respondent objects to each of the Interrogatories and Requests for Production of Documents on the following general grounds. Such objections are expressly incorporated into each response set forth herein whether or not specifically referred to therein:

1. The Respondent objects to Interrogatories and Requests for Production of Documents until such time as a decision has been rendered on the Respondent's Motion to Dismiss filed in this proceeding. On February 28, 2012, the Respondent filed a Motion to Dismiss the Formal Complaint on the basis that the Complainant does not possess the requisite standing to move forward with said Formal Complaint. UWUA subsequently filed an

Answer to said Motion. Depending upon the decision rendered on said Motion, the Interrogatories and Requests for Production of Documents may be deemed moot thereby removing any obligation on the Respondent to respond to the discovery request.

2. The Respondent objects to each and every Interrogatory and Requests for Production of Documents to the extent that it is duplicative, unreasonably cumulative, unduly burdensome, and oppressive or will cause unnecessary expense.

3. The Respondent objects to each and every Interrogatory and Requests for Production of Documents to the extent information sought is already in the public domain, or is readily obtainable from a source other than the Respondent in a more convenient, less burdensome and less expensive manner. Certain of the requested documents are available to the Complainant through their own efforts.

#### **SPECIFIC OBJECTIONS**

Subject to and without waiver of the General Objections (which are deemed incorporated as if set forth fully therein), PAWC, as the Respondent, specifically objects to the Interrogatories as follows:

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
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Docket No. C-2012-2287204

1. Please identify each witness PAWC expects to provide testimony as part of its direct case.

Objection:

See General Objections. UWUA as the Complainant in this proceeding has the burden of proof and must present at a hearing its case in chief proving each and every allegation set forth in the Formal Complaint. In that regard, UWUA must present its witnesses and evidence first. With that responsibility, PAWC does not know at this time who it will call as a witness to present testimony in rebuttal to UWUA case in chief.

Objections of Pennsylvania-American Water Company ("PAWC")  
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- Utility Workers Union of America System Local 537, Set I  
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2. For each witness identified in response to question 1, please provide the following:
  - a. The subject matter of the testimony.
  - b. A copy of the witness's curriculum vitae.
  - c. A list of all proceedings in which the witness has testified, including for each such proceeding the court or administrative agency, the caption and docket number, the approximate date, the party on whose behalf the witness testified, and the subject matter of the testimony.

Objection:

See General Objections. See Specific Objections to Interrogatory No. 1.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
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3. In paragraph 10 of the Answer, PAWC states that its "practice requires the posting of 3-day notice" in accordance with the Commission's regulations. Please provide a copy of any PAWC procedures or other documents that delineate this "practice."

Objection:

See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
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4. In paragraph 10 of the Answer, PAWC states that its "practice requires the posting of 3-day notice" in accordance with the Commission's regulations. Is PAWC aware of any failures of PAWC personnel to follow this "practice" that occurred between February 2008 and the present? If so, for each such violation please:
- a. Describe the failure to follow the "practice," including the location(s) and number of customer terminations that were performed in a manner other than as set forth in the "practice";
  - b. State how PAWC became aware of the failure to follow the "practice";
  - c. Identify the person or persons who failed to follow the "practice";
  - d. Describe the remedial measures taken by PAWC to ensure that the person or persons who failed to follow the "practice" would not do so again in the future; and
  - e. Provide all documents related to the failure to follow the "practice."

Objection:

See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
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5. In paragraph 10 of the Answer, PAWC states: "If any failure may have occurred with the posting of three-day notices, it may involve UWUA members failing to actually post said notices." Concerning this:
- a. For the time period from February 2008 through February 2012, please identify each instance of which PAWC is aware where a residential customer in the Mon Valley district had service terminated without the proper posting of a three-day notice.
  - b. For each such instance, please provide all documents concerning PAWC's knowledge of the cause of the improper termination.
  - c. For each such instance, please state whether PAWC believes the violation was a result of the failure of a UWUA member to perform his or her job responsibilities.
  - d. For each such instance where PAWC believes the improper termination was caused by a UWUA member failing to follow Company procedures, please describe the disciplinary actions or other remedial measures taken by PAWC against the UWUA member.
  - e. Please provide the specific information on which PAWC relied in making the averment in paragraph 10 that is quoted at the beginning of this question.

Objection:

See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
Docket No. C-2012-2287204

6. In paragraph 11 of the Answer, PAWC states: "to PAWC's knowledge, the practice was being followed in the Mon Valley district." Concerning this:
  - a. Please provide the specific information on which PAWC relied in making this averment in its Answer.
  - b. Please identify the person or persons who conducted any investigation or inquiry into whether the practice was being followed in the Mon Valley District.
  - c. Please provide all documents that set forth "PAWC's knowledge" concerning whether the practice was being followed in the Mon Valley district.
  - d. Please identify each person with specific knowledge of whether the practice was being followed in the Mon Valley district.

Objection:

See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
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7. In paragraph 14 of the Answer, PAWC states: "PAWC is without knowledge or information sufficient to admit or deny UWUA's averment as to what two UWUA members actually discussed with a Pittsburgh superintendent." Concerning this:
- a. Please describe the investigation or inquiry PAWC conducted to determine whether UWUA's averment was accurate.
  - b. Please identify each Pittsburgh superintendent in PAWC's employ between February 2011 and April 2011.
  - c. Please provide all documents discussing or referring to any actual or alleged violations of termination procedures that the persons identified in (b) either authored or received between February 2011 and the present.

Objection:

- a. See General Objections. UWUA failed to identify the two individuals so that PAWC could match those individuals with the title specified in the Formal Complaint. UWUA must identify the two UWUA members who claimed the discussion.
- b. See General Objections.
- c. See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
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8. Concerning paragraph 16 of the Answer: Please identify the specific "mechanisms or processes available to any PAWC personnel" that the Company avers were not "exhausted" by UWUA.

Objection:

See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
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9. Concerning paragraph 18 of the Answer:
- a. Please identify the PAWC Senior Director Field Operations – Western Pennsylvania who is referred to in this paragraph.
  - b. Please provide all documents relating to the “investigation” that was “launched into the shredding of three-day notices”.

Objection:

- a. See General Objections. UWUA has this information. In the Formal Complaint, UWUA states in Paragraph No. 17 “the UWUA President System President called the Director of PAWC’s Western Pennsylvania Operations . . . .” Since UWUA avers its System President made a call, the Complainant would know the name of the individual.
- b. See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
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10. Concerning paragraph 22 of the Answer:
  - a. Why is PAWC unable to admit or deny UWUA's description of PAWC's typical practice for the termination of service?
  - b. Please provide all written procedures or other documents setting forth PAWC's *procedures to terminate service to a customer*.

Objection:

See General Objections. The Respondent does not know what the Complainant means by use of the term "typical" practice.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
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11. Concerning paragraph 24 of the Answer: Please provide all written procedures or other documents setting forth PAWC's procedures to follow when the termination of service is attempted but not completed because a curb stop is found to be inoperable.

Objection:

See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
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12. In paragraph 26 of the Answer, PAWC states that it does not have "knowledge or information sufficient to admit or deny" whether PAWC believes that if post-termination notices are provided before termination is attempted, they do not need to be provided again after termination is actually performed. Concerning this:
- a. Please provide the specific information on which PAWC relied in stating that it does not have "knowledge or information sufficient to admit or deny" UWUA's averment.
  - b. Please identify the person or persons who conducted any investigation or inquiry into the accuracy of UWUA's averment.
  - c. Please provide all documents that set forth "PAWC's knowledge" concerning the accuracy of UWUA's averment.
  - d. Please identify each person in PAWC's management who has specific knowledge of PAWC's policies and procedures concerning the termination of service after a curb stop is found to be inoperable, including how those policies or procedures may have changed between February 2008 and the present.

Objection:

See General Objections. The Respondent specifically objects to Interrogatory No. 12. UWUA states at Paragraph No. 26, "PAWC management . . . ." The Complainant does not identify or define "PAWC management". Therefore, the Respondent is without knowledge or information to admit or deny the averment.

Objections of Pennsylvania-American Water Company ("PAWC")  
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13. In paragraph 28 of the Answer, PAWC states that it does not have "knowledge or information sufficient to admit or deny" whether the termination practices described by UWUA remain in effect today. Concerning this:
- a. Please provide the specific information on which PAWC relied in stating that it does not have "knowledge or information sufficient to admit or deny" UWUA's averment.
  - b. Please identify the person or persons who conducted any investigation or inquiry into the accuracy of UWUA's averment.
  - c. Please provide all documents that set forth "PAWC's knowledge" concerning the accuracy of UWUA's averment.
  - d. Please identify each person in PAWC's management who has specific knowledge of PAWC's current policies and procedures concerning the termination of service after a curb stop is found to be inoperable.

Objection:

See General Objections and Specific Objections to Interrogatory No. 12.

Objections of Pennsylvania-American Water Company ("PAWC")  
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14. The Answer includes a paragraph 29, but UWUA's Formal Complaint has only 28 numbered paragraphs. Please state whether paragraph 29 is simply a clerical error or whether it is meant to respond to a specific averment in UWUA's Formal Complaint. If the latter, please identify the specific averment to which paragraph 29 responds.

Objection:

Paragraph 29 is a clerical error.

Objections of Pennsylvania-American Water Company ("PAWC")  
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15. For the time period February 2008 through the present, please identify each formal complaint filed with the Commission against PAWC in which a residential customer alleged that PAWC failed to provide proper notice prior to terminating service.

Objection:

See General Objections. PAWC objects to this Interrogatory as being unduly burdensome and oppressive to request the Respondent to research and provide the Complainant with data covering a 4 year period. On or about February 7, 2012, UWUA filed the instant Formal Complaint against PAWC setting forth certain allegations. With the filing of said complaint, it was reasonable to assume that UWUA had the evidence on that date to support its allegation. In fact, in the verification attached to said complaint, Kevin Booth, President of UWUA, verified that "the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter." With that statement, it was expected Mr. Booth had the evidence at that time to support the allegation.

Now, with this interrogatory requesting 4 years of data, it would appear UWUA does not have first hand knowledge and evidence to support this allegation. In fact, with this interrogatory, it supports the premise and the Respondent's Motion in that UWUA does not have standing. This matter is not a Formal Complaint but a report to the Commission brought forth by UWUA. This report, if it is deemed necessary by the Commission, would be an investigation to be conducted by the Commission.

Moreover, the information is already in the public domain, or is readily obtainable from a source other than the Respondent. UWUA has the ability to obtain any and all Formal Complaint filed against the Respondent by simply accessing the information at the Commission's Secretary Bureau.

Objections of Pennsylvania-American Water Company ("PAWC")  
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Utility Workers Union of America System Local 537, Set I  
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16. For the time period February 2008 through the present, please identify each informal complaint lodged with the Commission against PAWC in which a residential customer alleged that PAWC failed to provide proper notice prior to terminating service. Please note: informal complaints that were not resolved informally and resulted in a formal complaint should be listed only in response to question 15.

Objection:

See General Objections. PAWC objects to this request as being unduly burdensome and oppressive to request the Respondent to research and provide the Complainant with data covering a 4 year period. On or about February 7, 2012, UWUA filed the instant Formal Complaint against PAWC setting forth certain allegations. With the filing of said complaint, it was reasonable to assume that UWUA had the evidence on that date to support its allegation. In fact, in the verification attached to said complaint, Kevin Booth, President of UWUA, verified that "the facts above set forth are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter." With that statement, it was expected Mr. Booth had the evidence at that time to support the allegation.

Now, with this interrogatory requesting 4 years of data, it would appear UWUA does not have first hand knowledge and evidence to support this allegation. In fact, with this interrogatory, it supports the premise and the Respondent's Motion in that UWUA does not have standing. This matter is not a Formal Complaint but a report to the Commission brought forth by UWUA. This report, if it is deemed necessary by the Commission, would be an investigation to be conducted by the Commission.

PAWC also objects to this Interrogatory to the extent it seeks information that is confidential.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
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17. For the time period February 2008 through the present, please identify each formal complaint filed with the Commission against PAWC in which a residential customer alleged that PAWC failed to provide proper post-termination notice after service was terminated.

Objection:

See General Objections and Specific Objections to Interrogatory No. 15.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
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18. For the time period February 2008 through the present, please identify each informal complaint filed with the Commission against PAWC in which a residential customer alleged that PAWC failed to provide proper post-termination notice after service was terminated. Please note: informal complaints that were not resolved informally and resulted in a formal complaint should be listed only in response to question 17.

Objection:

See General Objections and Specific Objections to Interrogatory No. 16. PAWC also objects to this Interrogatory to the extent it seeks information that is confidential.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
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19. For each formal complaint identified in response to questions 15 and 17, please provide the following:
- a. A copy of the formal complaint;
  - b. A copy of PAWC's answer to the complaint;
  - c. If the matter was settled, a copy of the settlement agreement;
  - d. If the matter was withdrawn by the complainant, a copy or description of any informal agreement entered into by PAWC and the complainant; and
  - e. If the matter was fully litigated, a copy of the initial decision and, if applicable, a copy of the Commission's final order.

Objection:

See General Objections and Specific Objections to Interrogatory Nos. 15 and 17. PAWC also objects to this Interrogatory to the extent it seeks information that is confidential.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
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20. For each informal complaint identified in response to questions 16 and 18, please provide a summary of the complaint and the manner in which it was resolved.

Objection:

See General Objections and Specific Objections to Interrogatory No. 16.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
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21. Please provide a copy of each report PAWC has filed with the Commission under 52 Pa. Code § 56.231 relating to the time period from February 2008 through February 2012.

Objection:

See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
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22. Please provide information comparable to the information set forth in the reports provided in response to question 21 for the Mon Valley district for the time period from February 2008 through February 2012.

Objection:

See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
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23. For each month from February 2008 through February 2012, please provide the following information concerning reconnection fees in the Mon Valley district:
- a. The amount PAWC billed to customers for reconnection fees.
  - b. *The amount credited to customers by PAWC for reconnection fees that were not properly billed to the customer or as recompense for terminations that were not conducted properly.*

Objection:

See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
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24. For each month from February 2008 through February 2012, please provide the following information concerning reconnection fees for PAWC as a whole:
- a. The amount PAWC billed to customers for reconnection fees.
  - b. The amount credited to customers by PAWC for reconnection fees that were not properly billed to the customer or as recompense for terminations that were not conducted properly.

Objection:

See General Objections.

Objections of Pennsylvania-American Water Company ("PAWC")  
to Interrogatories and Requests for Production of Documents of  
Utility Workers Union of America System Local 537, Set I  
Docket No. C-2012-2287204

25. Please identify each instance from February 2008 through February 2012 when PAWC informed the Commission (or any employee of the Commission) that a residential termination of service had not been performed in compliance with the Commission's regulations.

Objection:

See General Objections.

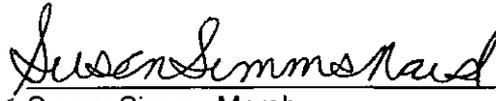
Objections of Pennsylvania-American Water Company ("PAWC")  
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Docket No. C-2012-2287204

26. For each instance identified in response to question 25, please provide all correspondence or other documents between PAWC and the Commission (or any employee of the Commission) relating to each such instance.

Objection:

See General Objections.

Respectfully submitted,

A handwritten signature in black ink that reads "Susan Simms Marsh". The signature is written in a cursive style and is positioned above a horizontal line.

Susan Simms Marsh  
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**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

UTILITY WORKERS UNION OF AMERICA :  
SYSTEM LOCAL 537, :  
Complainant :

v. :

DOCKET NO. C-2012-2287204

PENNSYLVANIA-AMERICAN WATER :  
COMPANY, :  
Respondent :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document, *Pennsylvania-American Water Company's Objections to Interrogatories and Requests for Production of Documents of Utility Workers Union of America System Local 537, Set I*, upon the participant listed below, in accordance with the requirements of 52 Pa. Code §1.54:

**VIA Email & First Class Mail**

Scott J. Rubin, Esq.  
333 Oak Lane  
Bloomsburg, PA 17815

Dated this 14<sup>th</sup> day of March, 2012.

**RECEIVED**

MAR 15 2012

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



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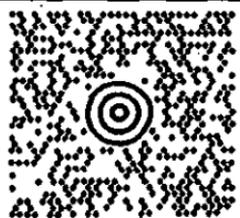
EMILY T. HICKS  
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**SHIP TO:**

ROSEMARY CHIAVETTA, SECRETARY  
717/772-7777  
PA PUBLIC UTILITY COMMISSION  
400 NORTH STREET  
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HARRISBURG PA 17120-0200



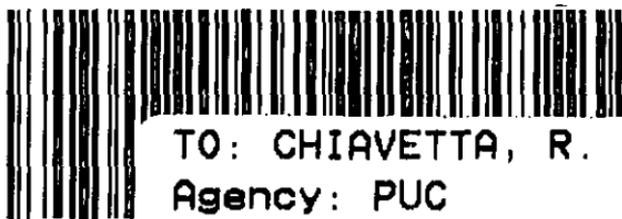
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