



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

July 21, 2020

Via Electronic Mail

Susan Simms Marsh, Esq.
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055

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

Dear Attorney Marsh:

Enclosed please find a copy of the Bureau of Investigation and Enforcement's (I&E) **Interrogatories RB (nos. 54-62) – Sakaya**. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to these Interrogatories are due within fifteen (15) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please provide your responses to me via email at the email address listed below.

Copies are being served on parties of record per the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic Service.* Should you have any questions, please do not hesitate to contact me.

Sincerely,

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

CBW/ac
Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter and Certificate of Service only – via efile*)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatories** dated July 21, 2020, in the manner and upon the persons listed below:

Served via Electronic Mail Only

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 PAWC

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

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

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

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

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

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 17101-1923
OCAPAWC2020@paoca.org

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

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
Bloomsburg, 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



Carrie B. Wright
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 208185