



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

September 29, 2020

Via Electronic Mail

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

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

Dear Attorney Zambito:

Enclosed please find the following **Responses of the Bureau of Investigation and Enforcement (I&E) to the Interrogatories of Pennsylvania-American Water Company Set IV:**

- **I&E Responses to PAWC Set IV (nos. 1 & 2) – Kubas**
- **I&E Responses to PAWC Set IV (no. 3) – Cline**
- **I&E Responses to PAWC Set IV (no. 3) – Wilson**

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 e-file*)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatory Responses** dated
September 29, 2020, in the manner and upon the persons listed below:

Served via Electronic Mail Only

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

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

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

Steven C. Gray, Esq.
Erin K. Fure, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov
efure@pa.gov

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

Dan Grieser, Esq.
Kilkenny Law LLC
519 Swede Street
Norristown, PA 19401
dan@skilkennylaw.com
Counsel for West Norriton Township

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

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

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

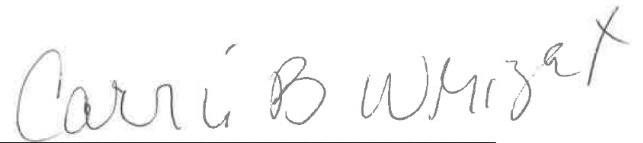
Roger D. Colton
Fisher, Sheehan & Colton
34 Warwick Road
Belmont, MA 02478
OCAPAWC2020@paoca.org
Consultant for OCA

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue, Suite 720 T
St. Louis, MO 63105
excel.consulting@sbcglobal.net
Consultant for OSBA

Jessica and Jeffrey Labarge
123 Fairmont Avenue
Reading, PA 19606
jessi@russolawllc.com
Complainants

Charles and Jennifer Spryn
899 Bullcreek Road
Butler, PA 16002
sprynhouse@live.com
Complainants

Jan K. Vroman
623 Eastman Street
West Mifflin, PA 15122
jan.vroman@yahoo.com
Complainant

A handwritten signature in cursive script that reads "Carrie B. Wright". The signature is written in dark ink and is positioned above a horizontal line.

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