



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

December 3, 2021

**Via Electronic Mail**

Courtney L. Schultz, Esq.  
Shane P. Simon, Esq.  
Saul Ewing Arnstein & Lehr LLP  
1500 Market Street  
Center Square West, 38<sup>th</sup> Floor  
Philadelphia, PA 19102

Re: Pennsylvania Public Utility Commission v.  
City of Lancaster – Water Department  
Docket No. R-2021-3026682  
**I&E Interrogatory**

Dear Counsel:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Interrogatory Set RB (no. 22) – Cline** for the above referenced proceeding. Please restate the Interrogatory before responding. The response should identify the responding person(s).

The response to this Interrogatories is due within ten (10) calendar days pursuant to the terms of the Prehearing Order entered in this case on November 10, 2021. Please provide your response to me via email at the email address listed below.

Consistent with the Pennsylvania Public Utility Commission's order regarding waiver of regulations regarding service requirements, issued at docket M-2021-3028321 on September 15, 2021, I&E is providing only electronic service on parties of record per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gina L. Miller', is written over a light blue circular stamp.

Gina L. Miller  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 313863  
(717) 787-8754  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)

GLM/ac  
Enclosures

cc: Rosemary Chiavetta, Secretary (*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 No. R-2021-3026682
	:	
City of Lancaster – Water Department	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Interrogatory** dated December 3, 2021, in the manner and upon the persons listed below:

**Served via Electronic Mail Only**

Courtney L. Schultz, Esq.  
Shane P. Simon, Esq.  
Saul Ewing Arnstein & Lehr LLP  
1500 Market Street  
Center Square West, 38th Floor  
Philadelphia, PA 19102  
[courtney.schultz@saul.com](mailto:courtney.schultz@saul.com)  
[shane.simon@saul.com](mailto:shane.simon@saul.com)  
*Counsel for City of Lancaster*

Christy M. Appleby, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor Forum Place  
Harrisburg, PA 17101-1923  
[OCALancaster2021@paoca.org](mailto:OCALancaster2021@paoca.org)

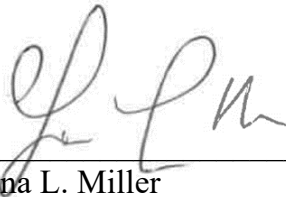
Erin K. Fure, Esq.  
Office of Small Business Advocate  
555 Walnut Street  
1st Floor Forum Place  
Harrisburg, PA 17101  
[efure@pa.gov](mailto:efure@pa.gov)

Frank D. Kitzmiller  
1041 Preston Road  
Lancaster, PA 17601  
[dkitz@comcast.net](mailto:dkitz@comcast.net)  
*Complainant*

Tony K. Koenig  
623 Covington Place  
Lancaster, PA 17601  
[TK17601@gmail.com](mailto:TK17601@gmail.com)  
*Complainant*

William Waters  
113 Sunwood Lane  
Lancaster, PA 17601  
[WMW1113@aol.com](mailto:WMW1113@aol.com)  
*Complainant*

Andre W. Renna  
Patricia A. Renna  
2129 Quail Drive  
Lancaster, PA 17601  
[AWRenna@comcast.net](mailto:AWRenna@comcast.net)  
*Complainants*



---

Gina L. Miller  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 313863