

Morgan Lewis

Kenneth M. Kulak

Partner
+1.215.963.5384
ken.kulak@morganlewis.com

June 30, 2022

VIA eFILING

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

**Re: Pennsylvania Public Utility Commission v.
Pennsylvania-American Water Company
Docket Nos. R-2022-3031672 and R-2022-3031673**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced matters is an **Errata** associated with Pennsylvania-American Water Company's Motion for Leave to File the Supplemental Direct Testimony of Ashley E. Everette and John R. Popiolek filed on June 24, 2022 (the "Errata"). Copies of the Errata have been served in accordance with the enclosed Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Kenneth M. Kulak

KMK/tp
Enclosures

c: Per Certificate of Service (w/encls.)

Morgan, Lewis & Bockius LLP

1701 Market Street
Philadelphia, PA 19103-2921
United States

T +1.215.963.5000
F +1.215.963.5001

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	DOCKET NOS. R-2022-3031672 R-2022-3031673
	:	
v.	:	
	:	
PENNSYLVANIA-AMERICAN WATER COMPANY	:	
	:	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the enclosed **Errata** on the persons below in the manner specified in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC MAIL

The Honorable Joel H. Cheskis
Deputy Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street, Second Floor
Harrisburg, PA 17120
jcheskis@pa.gov

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

Gina L. Miller
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
ginmiller@pa.gov

Laura Antinucci
Erin Gannon
Mackenzie C. Battle
Lauren E. Guerra
Pennsylvania Office of Consumer
Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101
ocapawc2022@paoca.org

Joseph L. Vullo
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlullo@bvrrlaw.com
Counsel for CEO

Amee L. Mazzaresse
Dickie, McCamey & Chilcote, P.C.
Attorneys at Law
Two PPG Place, Suite 400
Pittsburgh, PA 15222-5402
amazzaresse@dmclaw.com
Counsel for Cleveland-Cliffs Steel

Joan E. London
Kozloff Stoudt
Professional Corporation
2640 Westview Drive
Wyomissing, PA 19610
jlondon@kozloffstoudt.com
*Counsel for Borough of St.
Lawrence, Berks County, PA*

Karen O. Moury
Eckert Seamans Cherin & Mellott, LLC
213 Market Street – 8th Floor
Harrisburg, PA 17101
kmoury@eckertseamans.com
Counsel for Victory Brewing Company

Ria M. Pereira
Lauren N. Berman
John W. Sweet
Elizabeth R. Marx
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
Counsel for CAUSE-PA

Kurt J. Boehm
Jody Kyler Cohn
BOEHM, KURTZ & LOWRY
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com
Counsel for Cleveland-Cliffs Steel

Tucker R. Hull
J. Chadwick Schnee
Law Office of Tucker R. Hull, LLC
108 West Main Street
P.O. Box 330
Annville, PA 17003
tucker@tucker-hull-law.com
chadwick@tucker-hull-law.com
Counsel for Exeter Township

Adeolu A. Bakare
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
abakare@mcneeslaw.com
Counsel for PAWLUG

Lauren M. Burge
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street – 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
Counsel for Victory Brewing Company

Zachary D. O'Brien
231 Walnut Road
McDonald, PA 15057
obrien1280@gmail.com

Maria Elena Selznick
120 Lost Lantern Lane
East Stroudsburg, PA 18301
mseznick@yahoo.com

Mark Henderson
5425 East Lorane Road
Reading, PA 19606
markwh24@ptd.net

Jeff Henry
4621 Hillside Road
Reading, PA 19606
jeffhenry1@me.com

Keith Sauer
4824 Farming Ridge Boulevard
Reading, PA 19606
keith.j.sauer@gmail.com

Simeon Dobrev and Poli Iordanova
4210 Blue Mountain Crossing
East Stroudsburg, PA 18301
sd2734@yahoo.com

Carl E. Meyer
100 Grayhawk Way South
Mechanicsburg, PA 17050
carl.meyer@yahoo.com

Ivan Figueroa
432 Drycove Street
Pittsburgh, PA 15210
ivanfigueroa60@gmail.com

James Pagel
57 Narragansett Lane
Coatesville, PA 19320
J.Pagel47@gmail.com

William H. Rissmiller
1006 Hickory Lane
Reading, PA 19606
Whr19606@ptd.net

Jerome and Sheryl Rodzinak
181 Matson Avenue
Wilkes-Barre, PA 18705
zibadaun@frontiernet.net

Stephen T. Nardi
P.O. Box 224
146 Church Street
Claysville, PA 15323
nardiseast@gmail.com

Ramkrishna Sen
19 Evans Road
Norristown, PA 19403
Rksen1@gmail.com

Earl Knight
835 West Chestnut Street
Coatesville, PA 19320
eknight475@aol.com

Bridget L. Salkowski
4382 Hillside Road
Reading, PA 19606
bridgetlea115@yahoo.com

Sabatini Monatesti
919 Belair Drive
Berwick, PA 18603-2438
smonatesti@verizon.net

Barbara Cetnarowski
138 Butternut Street
Clairton, PA 15025
jmbac@comcast.net

Tacy Rutherford
60-2 Mint Tier
Reading, PA 19606
scotacy@icloud.com

Trish E. Luberta
31 Whitetail Lane
Reading Station, PA 19606-9490
trish.luberta@gmail.com

Nathan Woodford
6 Okmed Drive
Birdsboro, PA 19606-1166
nathwoodford@gmail.com

Amanda Barto-Ealy
102 Lawrence Avenue
Butler, PA 16001
mandaln79@gmail.com

Sean Seidel
1340 Butter Lane
Reading, PA 19606
sseidel@comcast.net

LeRoy James Watters, III
#1 East Indian Lane
Norristown, PA 19403-3507
lameswatters3@gmail.com

Latrese Laporte
2309 Snapdragon Street
East Stroudsburg, PA 18301
latrese.laporte@yahoo.com

Kathleen E. Jeffries
944 Mill Court
Bridgeville, PA 15017-1115
kejeffries@hotmail.com

Michael L. Pope
8607 Spruce Mill Drive
Yardley, PA 19067
mloringpope@gmail.com

John Palermo
2828 Dwight Avenue
Pittsburgh, PA 15216
palermojl@yahoo.com

Samantha Maize
16 Freedom Drive South
Bridgeville, PA 15017
samantha.maize@yahoo.com

Jorge Salazar
2328 Snapdragon Point
East Stroudsburg, PA 18301
jorge.m.salazar@gmail.com

Frank and Denise Piccola
284 Eastshore Drive
East Stroudsburg, PA 18301
frankpiccola@live.com

Hao Larry Tang
22 Shelduck Lane
Mechanicsburg, PA 17050
haotang@live.com

Darlene Nychey
5070 Brownsville Road
Pittsburgh, PA 15236
darlene.starfish@gmail.com

Lisa Inmon
4625 Painted Sky Road
Reading, PA 19608
lisainmon@icloud.com

Jessica Weiss
729 Orchard Street
Carnegie, PA 15106
weissjessica22@yahoo.com

Walter J. Yourkavitch
828 Beaver Lane
Reading, PA 19606-1106
byourkavitch828@comcast.net

Judith A. Garofolo
2208 Ridge Road
Finleyville, PA 15332-1506
jagarofolo@comcast.net

Diane Michalowski
94 Wessex Court
Reading, PA 19606
dianemichalowski@aol.com

Ellen B. Katz
130 Cedar Court
East Norriton, PA 19401
ekatz7114@gmail.com

Samantha Wesner
64 Glen Oley Drive
Reading, PA 19606
samanthawesner@gmail.com

Carla Seidel
110 Ashley Avenue
Reading, PA 19606
carla.seidel@gmail.com

Xin Xu
2121 Red Fox Drive
Hummelstown, PA 17036
xuletian71@gmail.com

West Norriton Township
1630 West Marshall Street
Jeffersonville, PA 19403
jbobst@wntwp.com
john@skilkennylaw.com

Brian Kalcic
Excel Consulting
7330 Dorset Avenue
St. Louis, MO 63130
excel.consulting@sbcglobal.net
Consultant for OSBA

Aaron Rothschild
Edgar Bandera
Rothschild Financial Consulting
ocapawc2022@paoca.org
Consultant for OCA

Barbara Alexander
Barbara Alexander Consulting
ocapawc2022@paoca.org
Consultant for OCA

Jerome Mierzwa
Exeter Associates
ocapawc2022@paoca.org
Consultant for OCA

Ralph Smith
Dawn Bisdorf
Megan Cranston
Mark Dady
Larkin & Associates
ocapawc2022@paoca.org
Consultants for OCA

Roger Colton
Fisher, Sheehan & Colton
ocapawc2022@paoca.org
Consultant for OCA

Terry Fought
ocapawc2022@paoca.org
Consultant for OCA

Ethan Cline
etcline@pa.gov
Consultant for I&E

DC Patel
dupatel@pa.gov
Consultant for I&E

Anthony Spadaccio
aspadaccio@pa.gov
Consultant for I&E

Christine Wilson
cswilson@pa.gov
Consultant for I&E

Joe Kubas
jkubas@pa.gov
Consultant for I&E

Lisa Gumby
lgumby@pa.gov
Consultant for I&E

Richard A. Baudino
J. Kennedy & Associates
1347 Frye Road
Westfield, NC 27053
rbaudino@jkenn.com
Consultant for Cleveland-Cliffs Steel

VIA FIRST CLASS MAIL

Lisa Tunzi
204 Susquehanna Avenue
West Pittston, PA 18643

Meade Buffington
950 Orchard Avenue – Lot 39
Camp Hill, PA 17011

Paul J. Walaski
65 Depot Street
Forest City, PA 18421



Kenneth M. Kulak (Pa. No. 75509)
Catherine G. Vasudevan (Pa. No. 210254)
Brooke E. McGlinn (Pa. No. 204918)
Mark A. Lazaroff (Pa. No. 315407)
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
215.963.5384 (bus)
215.963.5001 (fax)
ken.kulak@morganlewis.com
catherine.vasudevan@morganlewis.com
brooke.mcglinn@morganlewis.com
mark.lazaroff@morganlewis.com

Dated: June 30, 2022

Counsel for
Pennsylvania American Water Company

DB1/ 131254431.1

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	
v.	:	DOCKET NOS. R-2022-3031672
	:	R-2022-3031673
PENNSYLVANIA-AMERICAN WATER COMPANY	:	
	:	

ERRATA

On June 24, 2022, Pennsylvania-American Water Company (“PAWC” or the “Company”) filed its Motion for Leave to File the Supplemental Direct Testimony of Ashley E. Everette and John R. Popiolek (the “Motion”) in the referenced matter. Upon review of the as-filed document and further communications with the parties, PAWC discovered that the Company may have inadvertently misrepresented the position of the Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement regarding the Motion on page 2. Accordingly, PAWC submits the following errata with replacement pages (included as Attachment A) that incorporate the correction:

Reference	Reads	Should Read
Page 2, lines 13-18	To ensure the parties have reasonable notice of the updated claims for pension and OPEB expense, the Company believes it is appropriate to submit limited-scope Supplemental Direct Testimony. The Commission’s Bureau of Investigation and Enforcement, the Office of Consumer Advocate and the Office of Small Business Advocate have each indicated that they have no objection to the Company’s request to file the	To ensure the parties have reasonable notice of the updated claims for pension and OPEB expense, the Company believes it is appropriate to submit limited-scope Supplemental Direct Testimony. The Office of Consumer Advocate and the Office of Small Business Advocate have each indicated that they have no objection to the Company’s request to file the

Reference	Reads	Should Read
	Supplemental Direct Testimony described above.	Supplemental Direct Testimony described above.

Respectfully submitted,



Susan Simms Marsh (PA I.D. No. 44689)
Elizabeth Rose Triscari (PA I.D. No. 306921)
Teresa Harrold (PA I.D. No. 311082)
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
717.550.1570 (bus)
susan.marsh@amwater.com
elizabeth.triscari@amwater.com
teresa.harrold@amwater.com

Kenneth M. Kulak (Pa. No. 75509)
Catherine G. Vasudevan (Pa. No. 210254)
Brooke E. McGlinn (Pa. No. 204918)
Mark A. Lazaroff (Pa. No. 315407)
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
215.963.5384 (bus)
215.963.5001 (fax)
ken.kulak@morganlewis.com
catherine.vasudevan@morganlewis.com
brooke.mcglinn@morganlewis.com
mark.lazaroff@morganlewis.com

Counsel for Pennsylvania-American Water Company

Dated: June 30, 2022

ATTACHMENT A

Utility Commission (“Commission”). By Orders issued June 16, 2022, the Commission instituted a formal investigation to determine the lawfulness, justness and reasonableness of PAWC’s existing and proposed rates, rules and regulations. Accordingly, Tariff Nos. 5 and 16 were suspended by operation of law until January 28, 2023.¹

2. The pension and OPEB costs presented in PAWC’s April 29, 2022 filing were based on studies prepared by Willis Towers Watson.

3. Market conditions deteriorated rapidly in 2022 and, since the Company’s initial filing, Willis Towers Watson has prepared updated actuarial calculations. The Supplemental Direct Testimony of Mr. Popiolek describes those updated calculations as well as the evolving market conditions resulting in the changes in pension and OPEB costs. The Supplemental Direct Testimony of Ms. Everette addresses PAWC’s updated claims for pension and OPEB expense in the Fully Projected Future Test Year.

4. To ensure the parties have reasonable notice of the updated claims for pension and OPEB expense, the Company believes it is appropriate to submit limited-scope Supplemental Direct Testimony. The Office of Consumer Advocate and the Office of Small Business Advocate have each indicated that they have no objection to the Company’s request to file the Supplemental Direct Testimony described above.

DB1/ 131206685.1

¹ *Pa. P.U.C. v. Pennsylvania-American Water Company*, Docket Nos. R-2022-3031672 and R-2022-3031673 (Orders entered June 16, 2022).