



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

August 22, 2022

**Via Electronic Mail**

Kenneth M. Kulak, Esq.  
Brooke E. McGlinn, Esq.  
Catherine Vasudevan, Esq.  
Mark A. Lazaroff, Esq.  
Morgan Lewis & Bockius LLP  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)

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

**I&E Interrogatories**

Dear Counsel:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Interrogatories Set RS (nos. 41-43) – Cline** in the above-captioned proceedings. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

Pursuant to the discovery modifications outlined on pages 5-6 of the Scheduling Order issued in this case on June 30, 2022, responses to these Interrogatories are due within ten (10) calendar days of service. Please provide your responses to Gina L. Miller via email at [ginmiller@pa.gov](mailto:ginmiller@pa.gov).

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 dark ink that reads "Allison C. Kaster".

Allison C. Kaster  
Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 93176  
(717) 783-7998  
[akaster@pa.gov](mailto:akaster@pa.gov)

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 Nos. | R-2022-3031672 |
|                                        | : |             | R-2022-3031673 |
| Pennsylvania-American Water Company    | : |             |                |

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Interrogatories** dated August 22, 2022, in the manner and upon the persons listed below.

**Served via Electronic Mail Only**

Kenneth M. Kulak, Esq.  
Brooke E. McGlinn, Esq.  
Catherine Vasudevan, Esq.  
Mark A. Lazaroff, Esq.  
Morgan Lewis & Bockius LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
*Counsel for PAWC*

Susan Simms Marsh, Esq.  
Elizabeth Rose Triscari, Esq.  
Theresa Harrold, Esq.  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
[susan.marsh@amwater.com](mailto:susan.marsh@amwater.com)  
[elizabeth.triscari@amwater.com](mailto:elizabeth.triscari@amwater.com)  
[teresa.harrold@amwater.com](mailto:teresa.harrold@amwater.com)  
*Counsel for PAWC*

Erin L. Gannon, Esq.  
Mackenzie C. Battle, Esq.  
Lauren E. Guerra, Esq.  
David T. Evrard, Esq.  
Office of Consumer Advocate  
Forum Place  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101  
[ocapawc2022@paoca.org](mailto:ocapawc2022@paoca.org)

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

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

Joseph L. Vullo, Esq.  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrrlaw.com](mailto:jlvullo@bvrrlaw.com)  
*Counsel for CEO*

Karen O. Moury, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market St., 8th Floor  
Harrisburg, PA 17101  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
*Counsel for Victory Brewing Company*

Tucker R. Hull, Esq.  
J. Chadwick Schnee, Esq.  
Law Office of Tucker R. Hull, LLC  
108 W. Main Street  
P.O. Box 330  
Annville, PA 17003  
[tucker@tucker-hull-law.com](mailto:tucker@tucker-hull-law.com)  
[chadwick@tucker-hull-law.com](mailto:chadwick@tucker-hull-law.com)  
*Counsel for Exeter Township*

John F. Walko, Esq.  
Kilkenny Law, LLC  
519 Swede Street  
Norristown, PA 19401  
[john@skilkennylaw.com](mailto:john@skilkennylaw.com)  
*Solicitor for West Norriton Township*

Adeolu A. Bakare, Esq.  
McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
*Counsel for Pennsylvania-American Water  
Large Users Group*

Amee L. Mazzaresse, Esq.  
Dickie, McCamey & Chilcote, P.C.  
Two PPG Place, Suite 400  
Pittsburgh, PA 15222-5402  
[amazzaresse@dmclaw.com](mailto:amazzaresse@dmclaw.com)  
*Counsel for Cleveland-Cliffs Steel*

Kurt J. Boehm, Esq.  
Jody Kyler Cohn, Esq.  
Boehm, Kurtz & Lowry  
36 East Seventh Street, Suite 1510  
Cincinnati, OH 45202  
[kboehm@bkllawfirm.com](mailto:kboehm@bkllawfirm.com)  
[jkylercohn@bkllawfirm.com](mailto:jkylercohn@bkllawfirm.com)  
*Counsel for Cleveland-Cliffs Steel*

Joan E. London, Esq.  
Kozloff Stoudt  
2640 Westview Drive  
Wyomissing, PA 19610  
[jlondon@kozloffstoudt.com](mailto:jlondon@kozloffstoudt.com)  
*Solicitors for the Borough of  
St. Lawrence, Berks County*

Mark Henderson  
5425 E. Lorane Road  
Reading, PA 19606  
[markwh24@ptd.net](mailto:markwh24@ptd.net)

Lauren M. Burge, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
600 Grant Street, 44th Floor  
Pittsburgh, PA 15219  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)  
*Counsel for Victory Brewing Company*

Keith Sauer  
4824 Farming Ridge Boulevard  
Reading, PA 19606  
[keith.j.sauer@gmail.com](mailto:keith.j.sauer@gmail.com)

Ivan Figueroa  
432 Drycove Street  
Pittsburgh, PA 15210  
[ivanfigueroa60@gmail.com](mailto:ivanfigueroa60@gmail.com)

Jeff Henry  
4621 Hillside Road  
Reading, PA 19606  
[jeffhenry1@me.com](mailto:jeffhenry1@me.com)

Simeon Dovrev and Poli Iordanova  
4210 Blue Mountain Crossing  
East Stroudsburg, PA 18301  
[sd2734@yahoo.com](mailto:sd2734@yahoo.com)

Stephen T. Nardi  
146 Church Street  
P.O. Box 224  
Claysville, PA 15323  
[nardiseast@gmail.com](mailto:nardiseast@gmail.com)

Maria Elena Selznick  
120 Lost Lantern Lane  
East Stroudsburg, PA 18301  
[meselznick@yahoo.com](mailto:meselznick@yahoo.com)

Earl Knight  
835 W. Chestnut Street  
Coatesville, PA 19320  
[eknight475@aol.com](mailto:eknight475@aol.com)

Zachary D. O'Brien  
231 Walnut Road  
McDonald, PA 15057  
[obrien1280@gmail.com](mailto:obrien1280@gmail.com)

Ramkrishna Sen  
19 Evans Road  
Norristown, PA 19403  
[rksen1@gmail.com](mailto:rksen1@gmail.com)

Bridget L. Salkowski  
4382 Hillside Road  
Reading, PA 19606  
[bridgetleal15@yahoo.com](mailto:bridgetleal15@yahoo.com)

Carl E. Meyer  
100 Grayhawk Way S.  
Mechanicsburg, PA 17050  
[carl.meyer@yahoo.com](mailto:carl.meyer@yahoo.com)

Sabatini Monatesti  
919 Belair Drive  
Berwick, PA 18603-2438  
[smonatesti@verizon.net](mailto:smonatesti@verizon.net)

Judith L. Schwank, State Senator  
210 George Street, Suite 201  
Reading, PA 19605  
[senatorschwank@pasenate.com](mailto:senatorschwank@pasenate.com)

Barbara Cetnarowski  
138 Butternut Street  
Clairton, PA 15025  
[jmcbac@comcast.net](mailto:jmcbac@comcast.net)

James Pagel  
57 Narragansett Lane  
Coatesville, PA 19320  
[j.pagel47@gmail.com](mailto:j.pagel47@gmail.com)

Tacy Rutherford  
60-2 Min Tier  
Reading, PA 19606  
[scotacy@icloud.com](mailto:scotacy@icloud.com)

William H. Rissmiller  
1006 Hickory Lane  
Reading, PA 19606  
[whr19606@ptd.net](mailto:whr19606@ptd.net)

Lisa Tunzi  
204 Susquehanna Avenue  
West Pittston, PA  
[ltunzi@yahoo.com](mailto:ltunzi@yahoo.com)

Nathan Woodford  
6 Ormio Drive  
Reading, PA 19606  
[natewoodford@gmail.com](mailto:natewoodford@gmail.com)

Amanda Baro-Ealy  
102 Lawrence Ave.  
Butler, PA 16001  
[Mandaln79@gmail.com](mailto:Mandaln79@gmail.com)

Trish E. Luberta  
31 Whitetail Lane  
Reading Station, PA 19606-9490  
[trish.luberta@gmail.com](mailto:trish.luberta@gmail.com)

Darlene Nychey  
5070 Brownsville Road  
Pittsburgh, PA 15236  
[darlene.starfish@gmail.com](mailto:darlene.starfish@gmail.com)

Samantha Maize  
16 Freedom Drive S  
Bridgeville, PA 15017  
[samantha.maize@yahoo.com](mailto:samantha.maize@yahoo.com)

James Jackson  
841 Franklin Street  
Coatesville, PA 19320  
[Lyband.jj@gmail.com](mailto:Lyband.jj@gmail.com)

Latrese Laporte  
2309 Snapdragon Court  
East Stroudsburg, PA 18301  
[latrese.laporte@yahoo.com](mailto:latrese.laporte@yahoo.com)

Jorge Salazar  
2328 Snapdragon Point  
East Stroudsburg, PA 18301  
[jorge.m.salazar@gmail.com](mailto:jorge.m.salazar@gmail.com)

Michael L. Pope  
8607 Spruce Mill Drive  
Yardley, PA 19067-7251  
[mloringpope@gmail.com](mailto:mloringpope@gmail.com)

Judith A. Garofolo  
2208 Ridge Road  
Finleyville, PA 15332-1506  
[JAGarofolo@comcast.net](mailto:JAGarofolo@comcast.net)

Hao Larry Tang  
22 Shelduck Lane  
Mechanicsburg, PA 17050  
[haotang@live.com](mailto:haotang@live.com)

Lisa Inmon  
4625 Painted Sky Road  
Reading, PA 19608  
[lisainmon@icloud.com](mailto:lisainmon@icloud.com)

Jerome and Sheryl Rodzinak  
181 Matson Ave.  
Wilkes-Barre, PA 18705  
[zibadauw@frontiernet.net](mailto:zibadauw@frontiernet.net)

Ellen B. Katz  
130 Cedar Court  
Norristown, PA 19401  
[Ekatz7114@gmail.com](mailto:Ekatz7114@gmail.com)

Sean Seidel  
1340 Butter Lane  
Reading, PA 19606  
[sseidel@comcast.net](mailto:sseidel@comcast.net)

Diane Michalowski  
94 Wessex Court  
Reading, PA 19606  
[dianemichalowski@aol.com](mailto:dianemichalowski@aol.com)

LeRoy James Watters III  
#1 East Indian Lane  
Norristown, PA 19403-3507  
[LJamesWatters3@gmail.com](mailto:LJamesWatters3@gmail.com)

Walter J. Yourkavitch  
828 Beaver Lane  
Reading, PA 19606-1106  
[BYourkavitch828@comcast.net](mailto:BYourkavitch828@comcast.net)

Jessica Weiss  
729 Orchard Street  
Carnegie, PA 15106  
[weissjessica22@yahoo.com](mailto:weissjessica22@yahoo.com)

Frank M. Piccola  
284 Eastshore Drive  
East Stroudsburg, PA 18301  
[Frankpiccola@live.com](mailto:Frankpiccola@live.com)

John Palermo  
2828 Dwight Ave.  
Pittsburgh, PA 15216  
[palermojl@yahoo.com](mailto:palermojl@yahoo.com)

Brian Kalcic  
Excel Consulting  
7330 Dorset Avenue  
St. Louis, MO 63105  
[excel.consulting@sbcglobal.net](mailto:excel.consulting@sbcglobal.net)  
*Consultant for OSBA*



---

Allison C. Kaster  
Deputy Chief Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 93176  
(717) 783-7998  
[akaster@pa.gov](mailto:akaster@pa.gov)