

October 13, 2022

David P. Zambito Direct Phone 717-703-5892 Direct Fax 215-989-4216 dzambito@cozen.com

VIA E-MAIL

Stephanie M. Wimer, Esq. Senior Prosecutor Bureau of Investigation and Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street Harrisburg, PA 17120

RE: Pennsylvania Public Utility Commission, Bureau of Investigation and Enforcement v. Westover Property Management Company, L.P. d/b/a Westover Companies; Docket Nos. C-2022-3030251 and P-2020-3018499

Answers and Conditions of Westover Property Management Company, L.P., d/b/a Westover Companies, to the Requests for Entry for Inspection of the Bureau of Investigation and Enforcement

Dear Senior Prosecutor Wimer:

Enclosed please find the Answers and Conditions of Westover Property Management Company, L.P. d/b/a Westover Companies ("Westover"), to the Requests for Entry for Inspection served on Westover on October 3, 2022. We are serving this discovery response early, in case the Bureau of Investigation and Enforcement takes the position that the conditions stated herein constitute objections to the Requests for Entry for Inspection.

Copies have been served as shown on the attached Certificate of Service.

Please contact me if you have any question or concern. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR

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BY: DAVID P. ZAMBITO Counsel for Westover Property Management, L.P. d/b/a Westover Companies

DPZ:kmg Enclosures

cc: Per Certificate of Service

Rosemary Chiavetta (*Cover Letter and Certificate of Service Only*) Peter Quercetti, Vice President of Operations Management, Westover Companies Alexander Stefanelli, CFO, Westover Companies

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission,	:	
Bureau of Investigation and Enforcement	:	
	:	Docket Nos. C-2022-3030251
٧.	:	P-2021-3030002
	:	
Westover Property Management Company, L.P.	:	
d/b/a Westover Companies	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this 13th day of October, 2022 served the foregoing **Answers** and **Conditions of Westover Property Management Company, L.P.** d/b/a Westover **Companies to the Requests for Entry for Inspection of the Bureau of Investigation and Enforcement**, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND FIRST CLASS MAIL

Stephanie M. Wimer, Esq. Kayla L. Rost, Esq. Pennsylvania Public Utility Commission Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street, 2nd Floor West Harrisburg, PA 17120 stwiner@pa.gov karost@pa.gov

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David P. Zambito, Esq. Counsel for *Westover Property Management Company, L.P. d/b/a Westover Companies*