



December 27, 2022

VIA E-FILING

David P. Zambito

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

Rosemary Chiavetta, Secretary
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.; Docket Nos. C-2022-3030251 and P-2021-3030002

Motion of Westover Property Management Company, L.P. d/b/a Westover Companies to Dismiss Objections and Compel Answers to Interrogatories and Requests for Production of Documents

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("Commission") is the above-referenced Motion. Copies have been served as shown on the enclosed 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

By: David P. Zambito
Counsel for *Westover Property Management Company d/g/a Westover Companies*

DPZ/kmg
Enclosures

cc: Deputy Chief Administrative Law Judge Christopher P. Pell
Per Certificate of Service
Peter Quercetti
Alexander Stefanelli

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I have this 27th day of December, 2022 served the foregoing **Motion of Westover Property Management Company, L.P. d/b/a Westover Companies to Dismiss Objections and Compel Answers to Interrogatories and Requests for Production of Documents** 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

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



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

VERIFICATION

I, Peter D. Quasotti, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: December 27, 2022

Peter D. Quasotti

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

NOTICE TO PLEAD

Pursuant to 52 Pa. Code § 5.342(g)(1), you are hereby notified that you have five (5) days from the service of the enclosed Motion to Dismiss Objections and Compel Answers to Interrogatories and Requests for Production of Documents (“Motion”) of Westover Property Management Company, L.P. d/b/a Westover Companies (“Westover”) to file an Answer to the Motion. Your failure to answer will allow the Commission to rule on the Motion without a response from you, thereby requiring no other proof. All pleadings, such as an Answer, must be filed with the Secretary of the Pennsylvania Public Utility Commission, with a copy served on counsel for Westover, and where applicable the Administrative Law Judge presiding over the case.

File with:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265

With a copy to:

David P. Zambito, Esq. (PA ID #80017)
Jonathan P. Nase, Esq. (PA ID #44003)
Cozen O’Connor
17 North Second St., Suite 1410
Harrisburg, PA 17101



David P. Zambito, Esq. (ID #80017)
Jonathan P. Nase, Esq. (ID #44003)
Cozen O’Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
Tel: (717) 703-5892
Fax: (215) 989-4216
Email: dzambito@cozen.com
E-mail: jnase@cozen.com

Dated: December 27, 2022

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**MOTION OF
WESTOVER PROPERTY MANAGEMENT COMPANY, L.P.
D/B/A WESTOVER COMPANIES
TO DISMISS OBJECTIONS AND COMPEL
ANSWERS TO INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS**

AND NOW COMES Westover Property Management Company, L.P. d/b/a Westover Companies (“Westover”) pursuant to 52 Pa. Code § 5.342(g), to file this Motion to Dismiss Objections and Compel Answers to Interrogatories and Requests for the Production of Documents (“Motion”). Westover respectfully requests that Deputy Chief Administrative Law Judge Christopher P. Pell direct the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”) to answer Westover’s Interrogatories and Requests for the Production of Documents - Set III, Nos. 1-3.

In support whereof, Westover avers as follows:

I. PROCEDURAL HISTORY

A. Westover’s Petition for Declaratory Order

1. On December 13, 2021, Westover filed a Petition for Declaratory Order (“Original Petition”) to resolve a case and controversy by declaring that the Gas and Hazardous Liquids

Pipelines Act, 58 P.S. § 801.101 *et seq.* (“Act 127”) does not apply to Westover’s apartment complexes. The Original Petition was docketed at P-2021-3030002.

2. On January 3, 2022, I&E filed an Answer in Opposition to Westover’s Petition.

3. On May 16, 2022, Westover filed an Amended Petition for Declaratory Order (“Amended Petition”), which provided additional facts concerning Westover’s gas facilities at its apartment complexes.

4. On June 6, 2022, I&E filed an Answer in Opposition to Westover’s Amended Petition.

B. I&E’s Complaint

5. On January 3, 2022, I&E filed a formal complaint (“Complaint”) against Westover, which was docketed at C-2022-3030251. The Secretary’s Bureau served the Complaint on Westover by email on January 5, 2022. The Complaint alleged that Westover’s gas systems at seventeen apartment complexes in Pennsylvania are subject to Act 127 but have not complied with that statute. Among other things, I&E seeks a civil penalty of \$200,000.

6. On January 25, 2022, Westover filed its Answer and New Matter.

7. I&E filed its Reply to New Matter on February 14, 2022.

8. By Order entered on August 25, 2022, the Commission consolidated Westover’s Amended Petition with I&E’s Complaint and referred the matter to the Office of Administrative Law Judge (“OALJ”) for adjudication and the issuance of a recommended decision.

C. Westover’s Interrogatories Set III

9. On December 5, 2022, Westover served its Interrogatories and Requests for Production of Documents – Set III (“Set III”) on I&E. A copy of this discovery is attached as **Exhibit 1**.

10. On December 15, 2022, I&E filed Objections (“the “Objections”) to virtually all of the Interrogatories in Set III. **Exhibit 2.**

11. In an effort to informally resolve I&E’s Objections, Westover’s counsel exchanged e-mails with I&E’s counsel on December 21 and 22, 2022. Efforts to resolve the parties’ discovery dispute proved unsuccessful.

II. LEGAL STANDARDS

12. 52 Pa. Code § 5.321(c) sets the standard for permissible discovery in Commission proceedings. That regulation states:

(c) *Scope.* Subject to this subchapter, a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of a discoverable matter. It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

13. The Commission has consistently allowed participants wide latitude in discovery matters. *See, e.g., Pa. Pub. Util. Comm’n v. The Peoples Natural Gas Company*, 62 Pa. PUC 56 (Aug. 26, 1986); *Pa. Pub. Util. Comm’n v. Equitable Gas Company*, 61 Pa. PUC 468 (May 16, 1986).

14. The Commission’s regulations limit discovery, however. For example, 52 Pa. Code § 5.361 states:

- (a) Discovery or deposition is not permitted which:
 - (1) Is sought in bad faith.
 - (2) Would cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent, a person or party.

(3) Relates to matter which is privileged.

(4) Would require the making of an unreasonable investigation by the deponent, a party or witness.

III. THE ALJ SHOULD OVERRULE I&E'S OBJECTIONS AND DIRECT I&E TO ANSWER INTERROGATORIES SET III, NOS. 1-3

A. Background

15. Set III, Interrogatories No. 1-3 arise out of I&E's inspections of Westover's Woodland Plaza apartment complex on November 15, 2022. I&E requested this inspection as a form of discovery in this proceeding. *See* Interim Order Granting the Motion of the Bureau of Investigation and Enforcement to Compel Entry for Inspection (November 8, 2022).

16. The inspection was attended by Scott Orr, Terri Cooper-Smith and Kayla Rost, Esq. on behalf of I&E. The inspection was attended by Peter Quercetti, Dave Archembault, and Jonathan Nase, Esq. (among others), on behalf of Westover.

17. The I&E representatives began by inspecting the gas facilities of Westover and UGI at buildings K and J, where the UGI gas meter is located outside the building. A gas pipe goes through the wall, from the UGI meter to the Westover piping system.

18. The I&E representatives then proceeded to inspect the gas facilities of Westover and UGI at building H. Again, the UGI gas meter is located outside the building. A gas pipe goes through the wall, from the UGI meter to the Westover piping system.

19. Finally, the I&E representatives proceeded to inspect the gas facilities of Westover and UGI at buildings E and F. Again, the UGI gas meter is located outside the building. A gas pipe goes through the wall, from the UGI meter to the Westover piping system.

20. While I&E representatives were inspecting the gas facilities of Westover and UGI at buildings E and F, UGI personnel arrived at buildings K and J. Unbeknownst to Westover's

representatives, Mr. Orr had contacted UGI to report a gas leak at the meter outside of buildings K and J.

21. Shortly thereafter, additional UGI personnel arrived at Woodland Plaza. Ultimately, four or five UGI vehicles were on-site at Woodland Plaza.

22. UGI personnel inspected the meter and related UGI facilities outside buildings K and J, as well as the meter outside building H, and found leaks at these meters.

23. UGI personnel subsequently inspected all other meters and related UGI facilities at Woodland Plaza and found no additional leaks.

24. Based on conversations between Westover representatives and UGI personnel, it is Westover's understanding that the gas leaks at buildings K and J, as well as building H, were minor leaks on the UGI side of both meters. UGI personnel addressed the leaks before leaving the scene.

25. While UGI personnel were addressing the leaks, Westover's representatives asked I&E's representatives if they were ready to continue the inspection at Woodland Plaza. Mr. Orr told Westover's counsel that I&E staff could not leave the scene of the leaks because there was a "Grade 3 Emergency." Mr. Orr also told Dave Archembault that I&E staff could not leave the scene of the leaks because there was a "Grade C Emergency."

26. After the leaks at buildings K and J, and building H, were addressed by UGI personnel, and after UGI personnel inspected all other meters and related UGI gas facilities at Woodland Plaza, all representatives of I&E and Westover left Woodland Plaza to inspect other apartment complexes; no additional apartment buildings at Woodland Plaza were inspected by I&E's representatives.

27. Residents of the apartment complex observed the UGI vehicles and personnel while walking their dogs, going to their cars in the parking lot, and driving their vehicles through the

apartment complex. The sight of several UGI vehicles on site was a cause for alarm among some residents.

B. I&E Should be Compelled to Answer Interrogatories 1-3

28. Interrogatory 1 requests copies of all documents in the possession of I&E regarding UGI's activities at Woodland Plaza Apartments on November 15, 2022.

29. I&E objected to Interrogatory 1 on the following grounds:

- a. The term "UGI's activities" is overly broad.
- b. The requested information "would not lead to the discovery of facts of any consequence useful or necessary to determine the outcome of this proceeding." I&E's Objections p. 2.

30. Westover respectfully requests that the ALJ overrule these objections and compel I&E to answer Interrogatory 1 for the following reasons:

- a. I&E is well aware of what is meant by the reference to "UGI's activities at Woodland Plaza Apartments on November 15, 2022." During the inspection of Woodland Plaza on November 15, 2022, Mr. Orr called UGI to report a gas leak. UGI responded by coming to the apartment complex, inspecting gas facilities at the apartment complex, and addressing the gas leaks. I&E personnel observed UGI's activities at Woodland Plaza and talked to UGI's personnel at the site. Under the circumstances, the term is neither unclear nor overly broad.

- b. 52 Pa. Code § 5.321(c) allows the discovery of information that "appears reasonably calculated to lead to the discovery of admissible evidence." In this proceeding, I&E claims (among other things) that Westover is not complying with federal regulations governing pipelines at certain apartment complexes, including Woodland Plaza. If UGI filed reports with I&E regarding UGI's activities at Woodland Plaza on November 15,

2022, those reports could contain information that supports or contradicts I&E's claim that Westover's gas facilities do not comply with applicable federal pipeline regulations. If so, those documents would be admissible evidence in this proceeding. Moreover, if UGI filed reports with I&E regarding its activities at Woodland Plaza on November 15, 2022, those reports could identify other sources of information regarding Westover's gas system at this complex, thereby leading to the discovery of additional admissible evidence. Interrogatory 1 is reasonably calculated to lead to the discovery of admissible evidence in this proceeding and is well within the scope of permissible discovery.

c. I&E's inspection of Woodland Plaza was conducted as part of I&E's discovery in this case. At the inspection, I&E called UGI to the scene without the knowledge or consent of Westover. I&E should not be permitted to use UGI as an agent to conduct discovery on its behalf, and then hide that discovery from Westover until hearing.

d. If any documents indicate the gas leaks at buildings K and J, or building H, were on Westover's side of the meter, it is in the interest of public safety that I&E turn those documents over to Westover as quickly as possible, so that Westover can promptly take all necessary action to address the leaks.

31. Interrogatory 2 asks I&E to identify and describe all communications between Mr. Orr and UGI personnel at the Woodland Plaza apartment complex on November 15, 2022.

32. I&E objected to Interrogatory 2 on the grounds that the requested information "would not lead to the discovery of facts of any consequence useful or necessary to determine the outcome of this proceeding."

33. Westover respectfully requests that the ALJ overrule this objection and compel I&E to answer Interrogatory 2 for the following reasons:

a. 52 Pa. Code § 5.321(c) allows the discovery of information that “appears reasonably calculated to lead to the discovery of admissible evidence.” In this proceeding, I&E claims (among other things) that Westover is not complying with federal regulations governing pipelines. It is possible that, during their conversations, UGI personnel might have said something to Mr. Orr that supports or contradicts I&E’s claim that Westover’s gas facilities do not comply with applicable federal regulations. If so, those statements would be admissible evidence in this proceeding. Moreover, during their conversations, UGI personnel might have identified other sources of information about Westover’s gas facilities. These other sources of information might be admissible evidence in this proceeding. Therefore, Interrogatory 2 is reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

b. Similarly, during their conversations, Mr. Orr might have said something to UGI’s personnel that is inconsistent with other statements by Mr. Orr, or which could otherwise be used to impeach the testimony of Mr. Orr in this proceeding. In this respect, Interrogatory 2 is reasonably calculated to lead to the discovery of admissible evidence in this proceeding.

c. I&E’s inspection was conducted as part of its discovery in this case. At the inspection, I&E called UGI to the scene without the knowledge or consent of Westover. I&E should not be able to use UGI as an agent to conduct discovery on its behalf, and then hide that evidence from Westover until hearing.

34. Interrogatory 3 asks I&E about comments made by Mr. Orr at the inspection of the Woodland Plaza Apartments on November 15, 2022. Specifically, Interrogatory 3a requests a definition of a “Grade 3 Emergency” and a citation for that definition. Similarly, Interrogatory 3b requests an explanation of what happened at Woodland Plaza on November 15, 2022 that constituted a “Grade C Emergency.” Research by Westover has not located a definition of a “Grade 3 Emergency” or a “Grade C Emergency” in the context of natural gas pipelines.

35. I&E objected to Interrogatory 3 on the grounds that the requested information “would not lead to the discovery of facts of any consequence useful or necessary to determine the outcome of this proceeding.”

36. Westover respectfully requests that the ALJ overrule this objection and compel I&E to answer Interrogatories 3a and 3b. 52 Pa. Code § 5.321(c) allows the discovery of information that “appears reasonably calculated to lead to the discovery of admissible evidence.” Mr. Orr represented to Westover that the situation at Woodland Plaza on November 15, 2022 constituted a “Grade 3 Emergency” or a “Grade C Emergency.” Westover respectfully submits that Interrogatory 3 requests information that would be relevant and admissible to show Mr. Orr’s credibility as a witness who is knowledgeable of applicable pipeline laws and regulations. Mr. Orr’s credibility will be an important issue in this proceeding.

37. I&E claims that any notes Mr. Orr took during the inspection are not subject to discovery because they are protected by the attorney-client privilege. I&E Objections p. 7. Westover is not contesting this claim. Nevertheless, Westover respectfully requests that the ALJ compel Mr. Orr to explain his comments during the inspections by answering Interrogatory 3.

III. CONCLUSION

WHEREFORE, for the foregoing reasons, Westover respectfully requests that the ALJ:

- (1) grant the instant Motion;
- (2) overrule the Objections and direct I&E to answer Interrogatories and

Requests for the Production of Documents Nos.1-3 in Set III.

Respectfully submitted,



David P. Zambito, Esq. (I.D. No. 80017)

Jonathan P. Nase, Esq. (I.D. No. 44003)

Cozen O'Connor

17 North Second Street, Suite 1410

Harrisburg, PA 17101

Tel: (717) 703-5892

Fax: (215) 989-4216

Email: dzambito@cozen.com

E-mail: jnase@cozen.com

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

Date: December 27, 2022

Exhibit 1



December 5, 2022

VIA E-MAIL

David P. Zambito

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

Kayla Rost, Esq.
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-2021-3030002**

**Interrogatories and Requests for Production of Documents Propounded by
Westover Property Management Company, L.P. d/b/a Westover Companies on the
Bureau of Investigation and Enforcement – Set III**

Dear Prosecutor Rost:

Enclosed please find the Interrogatories and Requests for the Production of Documents Propounded by Westover Property Management Company, L.P. d/b/a Westover Companies on the Bureau of Investigation and Enforcement – Set III. Verified answers are due within twenty days. 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

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

DPZ:kmg
Enclosures

cc: Per Certificate of Service
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
v.	:	P-2021-3030002
	:	
Westover Property Management Company, L.P.	:	
d/b/a Westover Companies	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this 5th day of December, 2022 served the foregoing **Interrogatories and Requests for Production of Documents Propounded by Westover Property Management Company, L.P. d/b/a Westover Companies on the Bureau of Investigation and Enforcement - Set III**, 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

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
karost@pa.gov



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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED BY WESTOVER PROPERTY MANAGEMENT COMPANY, L.P. D/B/A
WESTOVER COMPANIES ON THE BUREAU OF INVESTIGATION AND
ENFORCEMENT – SET III**

Pursuant to 66 Pa. C.S. § 333 and 52 Pa. Code § 5.341 *et seq.*, Westover Property Management Company, L.P. d/b/a Westover Companies (“Westover”) hereby propounds the following Interrogatories and Requests for Production of Documents on the Bureau of Investigation and Enforcement (“I&E”) – Set III.

INSTRUCTIONS

1. The “Bureau of Investigation and Enforcement,” the “Responding Party,” “you,” or “your” means the party to which these interrogatories and requests for production of documents are propounded and/or all agents, affiliates, employees, consultants, and representatives acting on behalf of the Responding Party.
2. “Commission” means the Pennsylvania Public Utility Commission.
3. “Complaint” means the Formal Complaint filed by I&E against Westover on January 3, 2022 at Docket No. C-2022-3030251.
4. “Petition” means the Petition for Declaratory Order filed by Westover at Docket No. P-2021-3030002 (as amended).

5. To “identify” a natural person means to state that person’s full name, title or position, employer, last known address, and last known telephone number.

6. To “identify” a business entity means to state the full name of such business, the form of the business, and its location or address.

7. To “identify” a “document” means to provide all of the following information irrespective of whether the document is deemed privileged or subject to any claim of privilege:

- a. The title or other means of identification of each such document;
- b. The date of each such document;
- c. The author, preparer or signer of each such document; and
- d. A description of the subject matter of such document sufficient to permit

an understanding of its contents and importance to the testimony or position being examined and the present or last known location of the document. The specific nature of the document should also be stated (*e.g.*, letter, business record, memorandum, computer print-out, etc.). In lieu of “identifying” any document, it shall be deemed a sufficient compliance with these interrogatories to attach a copy of each such document to the answers hereto and reference said document to the particular interrogatory to which the document is responsive.

8. “Document” means the original and all drafts of all written and graphic matter, however produced or reproduced, of any kind or description, whether or not sent or received, and all copies thereof which are different in any way from the original (whether by interlineation, date-stamp, notarization, indication of copies sent or received, or otherwise), including without limitation, any paper, book, account, photograph, blueprint, drawing, sketch, schematic, agreement, contract, memorandum, press release, circular, advertising material, correspondence, letter, telegram, telex, object, report, opinion, investigation, record, transcript, hearing, meeting,

study, notation, working paper, summary, intra-office communication, diary, chart, minutes, index sheet, computer software, computer-generated records or files, however stored, check, check stub, delivery ticket, bill of lading, invoice, record or recording or summary of any telephone or other conversation, or of any interview or of any conference, or any other written, recorded, transcribed, punched, taped, filmed, or graphic matter of which the Responding Party has or has had possession, custody or control, or of which the Responding Party has knowledge.

9. “Communication” means any manner or form of information or message transmission, however produced or reproduced, whether as a document as herein defined, or orally or otherwise, which is made, distributed, or circulated between or among persons, or data storage or processing units.

10. “Date” means the exact day, month, and year, if ascertainable, or if not, the best approximation thereof.

11. “Person” refers to, without limiting the generality of its meaning, every natural person, corporation, partnership, association (whether formally organized or *ad hoc*), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency, or any other group or organization.

12. “Federal pipeline safety laws” has the same meaning as set forth in 58 P.S. § 801.102 (“Definitions”).

13. Items referred to in the singular include those in the plural, and items referred to in the plural include those in the singular.

14. Items referred to in the masculine include those in the feminine, and items referred to in the feminine include those in the masculine.

15. The answers provided should first restate the question asked and identify the person(s) supplying the information.

16. In answering these interrogatories, the Responding Party is requested to furnish all information that is available to the Responding Party, including information in the possession of the Responding Party's attorneys, agents, consultants, or investigators, and not merely such information of the Responding Party's own knowledge. If any of the interrogatories cannot be answered in full after exercising due diligence to secure the requested information, please so state and answer to the extent possible, specifying the Responding Party's inability to answer the remainder, and stating whatever information the Responding Party has concerning the unanswered portions. If the Responding Party's answer is qualified in any particular, please set forth the details of such qualification.

17. If the Responding Party objects to providing any document requested on any ground, identify such document by describing it as set forth in Paragraph 7 and state the basis of the objection.

18. If the Responding Party objects to part of an interrogatory and refuses to answer that part, state the Responding Party's objection and answer the remaining portion of that interrogatory. If the Responding Party objects to the scope or time period of an interrogatory and refuses to answer for that scope or time period, state the Responding Party's objection and answer the interrogatory for the scope or time period that the Responding Party believes is appropriate.

19. If, in connection with an interrogatory, the Responding Party contends that any information, otherwise subject to discovery, is covered by either the attorney-client privilege, the

so-called “attorneys’ work product doctrine,” or any other privilege or doctrine, then specify the general subject matter of the information and the basis to support each such objection.

20. If any information is withheld on grounds of privilege or other protection from disclosure, provide the following information: (a) every person to whom such information has been communicated and from whom such information was learned; (b) the nature and subject matter of the information; and, (c) the basis on which the privilege or other protection from disclosure is claimed.

21. These interrogatories are continuing and the Responding Party is obliged to change, supplement and correct all answers given to conform to new or changing information.

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
PROPOUNDED BY WESTOVER PROPERTY MANAGEMENT COMPANY, L.P. D/B/A
WESTOVER COMPANIES ON THE BUREAU OF INVESTIGATION AND
ENFORCEMENT – SET III**

DOCKET NOS. C-2022-3030251 and P-2021-3030002

1. Please provide copies of all documents in the possession of I&E regarding UGI's activities at Woodland Plaza Apartments on November 15, 2022.
2. Please Identify and describe all Communications between Scott Orr and UGI personnel at or regarding Woodland Plaza Apartments on November 15, 2022.
3.
 - a. What is a "Grade 3 Emergency?" Please provide a citation for this definition.
 - b. What occurred at Woodland Plaza on November 15, 2022 that was a "Grade C Emergency"?
4. Please provide copies of all Documents prepared by Scott Orr or Terri Cooper-Smith at or relating to the inspections held on November 15, 2022, November 16, 2022 and December 1, 2022.
5. Please explain why the Bureau of Investigation and Enforcement does not believe that Westover's gas facilities at the following apartment complexes are "master meter systems" as defined in 49 CFR § 191.3:
 - a. Jamestown Village
 - b. Caln East
 - c. Southern Valley Townhomes
 - d. Westover Village
 - e. Victoria Crossing
 - f. Newport Village
 - g. Carlisle Park

- h. Galey Park
- i. Woodview
- j. Rolling Glen
- k. Rosetree Crossing
- l. Boothwyn Court

Exhibit 2



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

December 15, 2022

Via Electronic Mail

David P. Zambito, Esq.
Jonathan P. Nase, Esq.
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
dzambito@cozen.com
jnase@cozen.com

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; P-2021-3030002
I&E Objections to Westover Interrogatories - Set III

Dear Counsel:

Enclosed are the Bureau of Investigation and Enforcement's ("I&E") Objections to the Interrogatories - Set III of Westover Property Management Company, L.P. d/b/a Westover Companies ("Westover") in the above-referenced matter.

Copies have been served on the parties of record in accordance with the Certificate of Service. If you have any questions, please contact the undersigned.

Sincerely,

Kayla L. Rost
Prosecutor
Bureau of Investigation & Enforcement
PA Attorney ID No. 322768
(717) 787-1888
karost@pa.gov

KLR/jfm
Enclosures

cc: Per Certificate of Service
Secretary Rosemary Chiavetta (*via e-file - without attachment*)
Hon. Christopher P. Pell, OALJ-Philadelphia (*via email - without attachment - cpell@pa.gov*)
Athena Delvillar, OALJ Legal Assistant (*via email - without attachment - sdelvillar@pa.gov*)
Michael L. Swindler, Deputy Chief Prosecutor (*via email - mwindler@pa.gov*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**OBJECTIONS OF THE BUREAU OF INVESTIGATION AND ENFORCEMENT
TO THE INTERROGATORIES - SET III
OF WESTOVER PROPERTY MANAGEMENT COMPANY, L.P.
d/b/a WESTOVER COMPANIES**

Pursuant to 52 Pa. Code § 5.342(c) and (e), the Bureau of Investigation and Enforcement (“I&E”) of the Pennsylvania Public Utility Commission (“Commission”), by and through its prosecuting attorneys, serves the within Objections to the Interrogatories - Set III of Westover Property Management Company, L.P. d/b/a Westover Companies (“Westover”), directed to I&E, and in support thereof, avers as follows:

OBJECTIONS

1. Please provide copies of all documents in the possession of I&E regarding UGI's activities at Woodland Plaza Apartments on November 15, 2022.

OBJECTION: I&E objects to this interrogatory because it exceeds the scope of permissible discovery in Commission proceedings. Section 5.321(c) of the Commission's regulations permits a party to:

obtain discovery regarding any matter, not privileged, which is **relevant to the subject matter involved in the pending action**, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears **reasonably calculated to lead to the discovery of admissible evidence**.

52 Pa. Code § 5.321(c)(emphasis added).

The interrogatory seeks information that is not relevant in that it would not lead to the discovery of facts of any consequence useful or necessary to determine the outcome of this proceeding. The subject matter of this proceeding is two-fold: (1) whether the Commission has jurisdiction over master meter systems pursuant the Gas and Hazardous Liquids Pipelines Act, 58 P.S. §§ 801.101 et seq. ("Act 127") and Part 192 of the Federal pipeline safety regulations, 49 CFR §§ 192.1-192.1015, and (2) whether Westover is a pipeline operator, as defined in 58 P.S. § 801.102, in that it operates master meter systems, as defined in 49 CFR § 191.3, at its apartment complexes and whether Westover is compliant with Part 192 of the Federal pipeline safety regulations, 49 CFR §§ 192.1-192.1015. Any documentation received by I&E relating to UGI's activities at Woodland Plaza Apartments on November 15, 2022 are not relevant to the pending proceeding or nor would any documentation be reasonably

calculated to lead to the discovery of admissible evidence. Moreover, a request regarding “UGI’s activities” is overly broad, seeks information of no probative value and, instead, confuses the issues.

2. Please Identify and describe all Communications between Scott Orr and UGI personnel at or regarding Woodland Plaza Apartments on November 15, 2022.

OBJECTION: I&E objects to this interrogatory because it exceeds the scope of permissible discovery in Commission proceedings. Section 5.321(c) of the Commission's regulations permits a party to:

obtain discovery regarding any matter, not privileged, which is **relevant to the subject matter involved in the pending action**, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party It is not ground for objection that the information sought will be inadmissible at hearing if the information sought **appears reasonably calculated to lead to the discovery of admissible evidence**.

52 Pa. Code § 5.321(c)(emphasis added).

The interrogatory seeks information that is not relevant in that it would not lead to the discovery of facts of any consequence useful or necessary to determine the outcome of this proceeding. The subject matter of this proceeding is two-fold: (1) whether the Commission has jurisdiction over master meter systems pursuant the Gas and Hazardous Liquids Pipelines Act, 58 P.S. §§ 801.101 et seq. ("Act 127") and Part 192 of the Federal pipeline safety regulations, 49 CFR §§ 192.1-192.1015, and (2) whether Westover is a pipeline operator, as defined in 58 P.S. § 801.102, in that it operates master meter systems, as defined in 49 CFR § 191.3, at its apartment complexes and whether Westover is compliant with Part 192 of the Federal pipeline safety regulations, 49 CFR §§ 192.1-192.1015. Any communications between I&E and UGI at Woodland Plaza Apartments on November 15, 2022 are not relevant to the pending proceeding nor would any communication be reasonably calculated to lead to the discovery of admissible evidence.

3. a. What is a “Grade 3 Emergency?” Please provide a citation for this definition.
- b. What occurred at Woodland Plaza on November 15, 2022 that was a “Grade C Emergency”?

OBJECTION: I&E objects to this interrogatory because it exceeds the scope of permissible discovery in Commission proceedings. Section 5.321(c) of the Commission’s regulations permits a party to:

obtain discovery regarding any matter, not privileged, which is **relevant to the subject matter involved in the pending action**, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party It is not ground for objection that the information sought will be inadmissible at hearing if the information sought **appears reasonably calculated to lead to the discovery of admissible evidence**.

52 Pa. Code § 5.321(c)(emphasis added).

The interrogatory seeks information that is not relevant in that it would not lead to the discovery of facts of any consequence useful or necessary to determine the outcome of this proceeding. The subject matter of this proceeding is two-fold: (1) whether the Commission has jurisdiction over master meter systems pursuant the Gas and Hazardous Liquids Pipelines Act, 58 P.S. §§ 801.101 et seq. (“Act 127”) and Part 192 of the Federal pipeline safety regulations, 49 CFR §§ 192.1-192.1015, and (2) whether Westover is a pipeline operator, as defined in 58 P.S. § 801.102, in that it operates master meter systems, as defined in 49 CFR § 191.3, at its apartment complexes and whether Westover is compliant with Part 192 of the Federal pipeline safety regulations, 49 CFR §§ 192.1-192.1015. The request for a definition is not relevant to the pending proceeding nor would any definition be reasonably calculated to lead to the discovery of admissible evidence. Moreover, a purported designation or

classification has no bearing on whether the pipeline facilities qualify as a master meter system.

4. Please provide copies of all Documents prepared by Scott Orr or Terri Cooper-Smith at or relating to the inspections held on November 15, 2022, November 16, 2022 and December 1, 2022.

OBJECTION: I&E objects to this interrogatory because it exceeds the scope of permissible discovery in Commission proceedings. Section 5.321(c) of the Commission's regulations permits a party to:

obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

52 Pa. Code § 5.321(c).

The requested documents prepared by Mr. Orr and Ms. Cooper Smith are protected from disclosure by the attorney-client privilege and Section 5.323(a). 52 Pa. Code § 5.323(a). The attorney-client privilege prohibits compelling a client to disclose confidential communications. 42 Pa.C.S. § 5928. The privilege requires the existence of a relationship in which an attorney is acting in his or her professional capacity as a lawyer, notably when there has been a professional consultation with an attorney who acts or advises as such. *Okum v. Commonwealth of Pa.*, 465 A.2d 1324, 1325 (Pa. Cmwlth. 1983) (citing *In re Fogg's Estate*, 94 A. 453 (Pa. 1915)); *Okum*, 465 A.2d at 1325 (citing *Alexander v. Queen*, 97 A. 1063 (Pa. 1916)). Here, the privilege extends to Mr. Orr's and Ms. Cooper Smith's personal notes, which were prepared by I&E Pipeline Safety Inspectors for legal prosecutory

personnel in I&E, for the purpose of seeking professional legal advice regarding whether the apartment complexes are master meter systems. The notes have not been disseminated to the public or any other non-attorney personnel at the Commission. Consequently, disclosure of the notes is protected by the attorney-client privilege.

Furthermore, the attorney-client privilege operates in a two-way fashion to protect confidential client-to-attorney or attorney-to-client communications made for the purpose of obtaining or providing professional legal advice. *Gillard v. AIG Ins. Co.*, 15 A.3d 44, 59 (Pa. 2011). Pennsylvania law makes clear that it is the client who owns this privilege: “The purpose of the attorney-client privilege is to benefit the client, and accordingly, the client is the holder of the privilege.” *Maleski v. Corporate Life Insurance Co.*, 641 A.2d 1, 4 (Pa. Cmwlth. 1994). Pursuant to the holding in *Upjohn Co. v. U.S.*, 449 U.S. 383 (1981), communications, including written communications, by Pipeline Safety personnel to or for I&E Prosecutory Staff fall within the scope of attorney-client privilege when the communication is kept confidential and when the communication is made at the request of counsel with the goal of furthering counsel’s provision of legal advice, legal evaluation, or assistance in trial. *Custom Designs & Mfg. Co. v. Sherwin-Williams Co.*, 39 A.3d 372, 379 (Pa. Super. 2012)(applying the holding in *Upjohn Co. v. U.S.*, 449 U.S. 383 (1981)). I&E Prosecutory Staff requested Mr. Orr and Ms. Cooper Smith keep notes of their observations and mental impressions, if any, made during the visual inspection, and thus the notes are protected under attorney-client privilege.

Moreover, Section 5.323 provides:

With respect to the representative of a party other than the party's attorney, discovery may not include disclosure of his mental impressions, conclusions or opinions respecting the value or merit of a claim or defense or respecting strategy, tactics or preliminary or draft versions of written testimony or exhibits, whether or not final versions of the testimony or exhibits are offered into evidence.

52 Pa. Code § 5.323(a).

Lastly, Mr. Orr's and Ms. Cooper Smith's personal notes would not be disclosed or discoverable under the Right to Know Law. 65 P.S. § 67.708(b)(17)(ii). Specifically, the Right to Know Law excludes the non-criminal record of any agency which includes investigative materials, notes, correspondence, and reports. 65 P.S. § 67.708(b)(17)(ii).

5. Please explain why the Bureau of Investigation and Enforcement does not believe that Westover's gas facilities at the following apartment complexes are "master meter systems" as defined in 49 CFR § 191.3:

- a. Jamestown Village
- b. Caln East
- c. Southern Valley Townhomes
- d. Westover Village
- e. Victoria Crossing
- f. Newport Village
- g. Carlisle Park
- h. Galey Park
- i. Woodview
- j. Rolling Glen
- k. Rosetree Crossing
- l. Boothwyn Court

OBJECTION: I&E objects to this interrogatory because it exceeds the scope of permissible discovery in Commission proceedings. Section 5.321(c) of the Commission's regulations permits a party to:

obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

52 Pa. Code § 5.321(c).

The interrogatory seeks discovery of I&E's legal conclusions and, as such, is outside the permissible scope of discovery since it seeks disclosure of the mental impressions of a party's attorney, or his or her conclusions, opinions, summaries, legal research, or legal theories.

Information related to I&E's informal investigations of master meter systems at apartment complexes not identified in the Complaint or Westover's Answer and Amended Petition are protected from disclosure by the attorney-client and deliberative process privileges. The attorney-client privilege extends to any referral from the I&E Safety Division to the I&E Enforcement Division, *i.e.*, the prosecuting attorneys, for professional legal consultation and evaluation of matters pertaining to master meter systems that were investigated by the I&E Safety Division as it relates to their enforcement or potential enforcement. The deliberative process privilege also protects these documents from disclosure as they contain confidential deliberations of law and reflect opinions, recommendations or advice.

Moreover, Deputy Chief Administrative Law Judge Christopher Pell found that Interrogatories not related to the specific apartment complexes identified in I&E's Complaint and addressed by Westover in its Answer and Amended Petition are beyond the scope of this proceeding. *See* Interim Order Addressing Motions to Compel Filed by Westover Property Management Company, L.P. and the Bureau of Investigation and Enforcement, dated October 25, 2022.

I&E will provide a response to (g) Carlisle Park.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:		
Bureau of Investigation and Enforcement	:		
Complainant	:		
	:		
v.	:	Docket No.	C-2022-3030251
	:	Docket No.	P-2021-3030002
Westover Property Management Company, L.P.	:		
d/b/a Westover Companies	:		
Respondent	:		


AFFIDAVIT OF TERRI COOPER SMITH IN SUPPORT OF
THE BUREAU OF INVESTIGATION AND ENFORCEMENT'S
OBJECTION TO THE INTERROGATORIES - SET III
OF WESTOVER PROPERTY MANAGEMENT COMPANY, L.P.
d/b/a WESTOVER COMPANIES

I, Terri Cooper Smith, being duly sworn according to law, depose and say the following:

1. My name is Terri Cooper Smith and my business address is 400 North Street, Harrisburg, PA 17120.
2. I am a Fixed Utility Valuation Engineer Supervisor in the Pennsylvania Public Utility Commission's ("Commission") Bureau of Investigation and Enforcement's ("I&E"), Pipeline Safety Section.
3. I am the Fixed Utility Valuation Engineer Supervisor who attended the visual inspections of Westover's apartment complexes on November 15, 2022, November 16, 2022, and December 1, 2022.

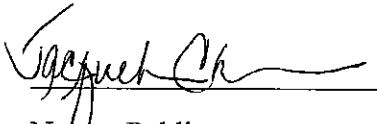
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

4. Prior to attending the visual inspections, Prosecutor Kayla L. Rost instructed me to keep notes, if any, of my observations, mental impressions, and conclusions made during the visual inspections for litigation purposes. I was advised that my personal notes will be kept confidential, and I invoke my right to keep my personal notes confidential.

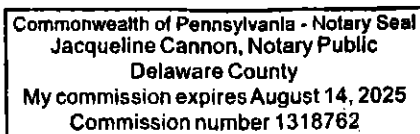
X 

Terri Cooper Smith
Fixed Utility Valuation Engineer Supervisor

Sworn and subscribed before me
this 12th day of December 2022.



Notary Public
My Commission expires on:



Member, Pennsylvania Association of Notaries

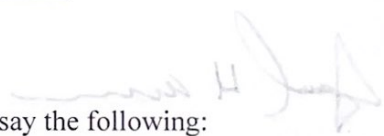
575 Church Lane
Heads, PA 19050
Delaware Cty, PA
December 17, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission,	:		
Bureau of Investigation and Enforcement	:		
Complainant	:		
	:		
v.	:	Docket No.	C-2022-3030251
	:	Docket No.	P-2021-3030002
Westover Property Management Company, L.P.	:		
d/b/a Westover Companies	:		
Respondent	:		

AFFIDAVIT OF SCOTT ORR IN SUPPORT OF
THE BUREAU OF INVESTIGATION AND ENFORCEMENT'S
OBJECTION TO THE INTERROGATORIES - SET III
OF WESTOVER PROPERTY MANAGEMENT COMPANY, L.P.
d/b/a WESTOVER COMPANIES

Member, Pennsylvania Association of Notaries
Commission number 1382017
My commission expires March 2, 2028
Bucks County
Notary Public
Notary Seal
Pennsylvania - Notary Seal

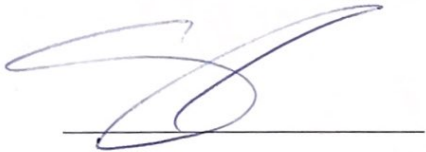


I, Scott Orr, being duly sworn according to law, depose and say the following:

1. My name is Scott Orr and my business address is 400 North Street, Harrisburg, PA 17120.
2. I am a Fixed Utility Valuation Engineer-3 in the Pennsylvania Public Utility Commission's ("Commission") Bureau of Investigation and Enforcement's ("I&E"), Pipeline Safety Section.
3. I am the Fixed Utility Valuation Engineer who attended the visual inspections of Westover's apartment complexes on November 15, 2022, November 16, 2022, and December 1, 2022.

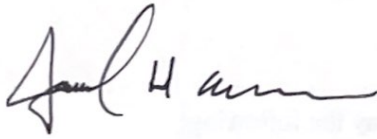
**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

4. Prior to attending the visual inspections, Prosecutor Kayla L. Rost instructed me to keep notes, if any, of my observations, mental impressions, and conclusions made during the visual inspections for litigation purposes. I was advised that my personal notes will be kept confidential, and I invoke my right to keep my personal notes confidential.



Scott Orr
Fixed Utility Valuation Engineer- 3

Sworn and subscribed before me
this 1st day of December 2022.



Commonwealth of Pennsylvania - Notary Seal Jacob H. Wildemore, Notary Public Bucks County My commission expires March 5, 2026 Commission number 1282077 Member, Pennsylvania Association of Notaries

Notary Public
My Commission expires on: March 5 2026

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**


Pennsylvania Public Utility Commission,	:		
Bureau of Investigation and Enforcement	:		
Complainant	:		
	:		
v.	:	Docket No.	C-2022-3030251
	:		P-2021-3030002
Westover Property Management Company, L.P.	:		
d/b/a Westover Companies	:		
Respondent	:		

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Objections of the Bureau of Investigation and Enforcement to the Interrogatories - Set III of Westover Property Management Company, L.P. d/b/a Westover Companies**, upon the parties listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

Service by Electronic Mail Only

David P. Zambito, Esq.
Jonathan P. Nase, Esq.
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
dzambito@cozen.com
jnase@cozen.com
*Counsel for Westover Property
Management Company, L.P.
d/b/a Westover Companies*



Kayla L. Rost
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 322768
(717) 787-1888
karost@pa.gov

Dated: December 15, 2022



Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Harrisburg, PA 17105-3265
EFILING - FILING DETAIL

Date Created	Filing Number
12/15/2022	2448098

Your filing has been electronically received. Upon review of the filing for conformity with the Commission's filing requirements, a notice will be issued acknowledging acceptance or rejection (with reason) of the filing. The matter will receive the attention of the Commission and you will be advised if any further action is required on your part.

The date filed on will be the current day if the filing occurs on a business day before or at 4:30 p.m. (EST). It will be the next business day if the filing occurs after 4:30 p.m. (EST) or on weekends or holidays.

Docket Number: C-2022-3030251

Case Description:

Transmission Date: 12/15/2022 3:10 PM

Filed On: 12/15/2022 3:10 PM

eFiling Confirmation Number: 2448098

File Name	Document Type	Upload Date
C-2022-3030251 et al (Westover) I&E Objection to Westover Interrogatories Set III CL&COS.pdf	Certificate of Service	12/15/2022 3:08:16 PM

For filings exceeding 250 pages, the PUC is requiring that filers submit one paper copy to the Secretary's Bureau within three business days of submitting the electronic filing online. Please mail the paper copy along with copy of this confirmation page to Secretary, Pennsylvania Public Utility Commission, 400 North Street, Harrisburg PA 17120 a copy of the filing confirmation page or reference the filing confirmation number on the first page of the paper copy.

No paper submission is necessary for filings under 250 pages.

You can view a record of this filing and previous filings you have submitted to the PUC by using the links in the Filings menu at the top of the page. Filings that have been submitted within the last 30 days can be viewed by using the Recent Filings link. Older filings can be viewed by using the search options available in the Filing History link.