

# Morgan Lewis

**Kenneth M. Kulak**

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

December 5, 2023

## **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-2023-3043189 and R-2023-3043190**

Dear Secretary Chiavetta:

Enclosed for filing in the above-captioned proceedings, is the **Certificate of Service** evidencing service of the **Responses of Pennsylvania-American Water Company to the following Interrogatories**:

- 1. Bureau of Investigation & Enforcement, Set RS, Question Nos. 1-13;**
- 2. Office of Consumer Advocate, Set I, Questions, 1-11; and Set II, Question Nos. 1-8; and**
- 3. Office of Small Business Advocate, Set I, Question Nos. 1-18.**

As indicated in the Certificate of Service, copies have been served upon all parties of record. If you have any questions, please do not hesitate to contact me.

Very truly yours,



Kenneth M. Kulak

KMK/ap

Enclosures

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

DB1/ 142764106.1

**Morgan, Lewis & Bockius LLP**

2222 Market Street  
Philadelphia, PA 19103-3007  
United States

**T** +1.215.963.5000  
**F** +1.215.963.5001

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>PENNSYLVANIA PUBLIC UTILITY COMMISSION</b>	<b>:</b>	<b>DOCKET NOS.: R-2023-3043189 (Water)</b>
	<b>:</b>	<b>R-2023-3043190 (Wastewater)</b>
<b>v.</b>	<b>:</b>	
<b>PENNSYLVANIA-AMERICAN WATER COMPANY</b>	<b>:</b>	

**CERTIFICATE OF SERVICE**

I hereby certify and affirm that I have this day served a true and correct copy of the foregoing documents on the following persons, in the manner specified below, in accordance with the requirements of 52 Pa. Code Section 1.54:

**VIA ELECTRONIC MAIL**

Erin L. Gannon  
Melanie J. El Atieh  
David T. Evrard  
Andrew J. Zerby  
Keith Earls  
Office of Consumer Advocate  
5th Floor Forum Place  
555 Walnut Street  
Harrisburg PA 17101-1923  
[EGannon@paoca.org](mailto:EGannon@paoca.org)  
[MElAtieh@paoca.org](mailto:MElAtieh@paoca.org)  
[DEvrard@paoca.org](mailto:DEvrard@paoca.org)  
[AZerby@paoca.org](mailto:AZerby@paoca.org)  
[KEarls@paoca.org](mailto:KEarls@paoca.org)  
*Counsel for OCA*

Carrie B. Wright  
Bureau of Investigation and & Enforcement  
Pennsylvania Public Utility Commission  
Commerce Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg PA 17120  
[carwright@pa.gov](mailto:carwright@pa.gov)  
*Counsel for I&E*

Steven C. Gray  
Rebecca Lyttle  
Office of Small Business Advocate  
Forum Place  
555 Walnut Street, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto:relyttle@pa.gov)  
*Counsel for OSBA*

Joseph L. Vullo  
Burke Vullo Reilly Roberts  
1460 Wyoming Avenue  
Forty Fort, PA 18704  
[jlvullo@bvrllaw.com](mailto:jlvullo@bvrllaw.com)  
*Counsel for Commission on Economic  
Opportunity*

Adeolu A. Bakare  
Ryan Block  
McNees Wallace & Nurick LLC  
100 Pine Street  
Harrisburg, PA 17101  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[rblock@mcneeslaw.com](mailto:rblock@mcneeslaw.com)  
*Counsel for Pennsylvania-American Water  
Large Users Group*

Ria Pereira  
John Sweet  
Elizabeth Marx  
Lauren Berman  
The Pennsylvania Utility Law Project  
Harry Geller  
118 Locust Street  
Harrisburg, PA 17101  
[rpereira@pautilitylawproject.org](mailto:rpereira@pautilitylawproject.org)  
[jsweet@pautilitylawproject.org](mailto:jsweet@pautilitylawproject.org)  
[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)  
[lberman@pautilitylawproject.org](mailto:lberman@pautilitylawproject.org)  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
*Counsel for CAUSE-PA*

### CONSULTANTS – WITNESSES

Ralph C. Smith  
Mark S. Dady  
Megan Eliaz  
Dawn Bisdorf  
Larkin & Associates, PLLC  
15728 Farmington Road  
Livonia, MI 48154  
[rsmithla@aol.com](mailto:rsmithla@aol.com)  
[msdady@gmail.com](mailto:msdady@gmail.com)  
[dawn.bisdorf@gmail.com](mailto:dawn.bisdorf@gmail.com)  
[mcranston29@gmail.com](mailto:mcranston29@gmail.com)  
*Consultants for OCA*

David Garrett  
Resolve Utility Consulting PLCC  
101 Park Avenue, Suite 1125  
Oklahoma City, OK 73102  
[dgarrett@resolveuc.com](mailto:dgarrett@resolveuc.com)  
*Consultant for OCA*

Jerome D. Mierzwa  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway, Suite 300  
Columbia, MD 21044  
[jmierzwa@exeterassociates.com](mailto:jmierzwa@exeterassociates.com)  
*Consultant for OCA*

Terry L. Fought  
780 Cardinal Drive  
Harrisburg, PA 17111  
[foughtbusiness@gmail.com](mailto:foughtbusiness@gmail.com)  
*Consultant for OCA*

Barbara Alexander  
Barbara Alexander Consulting, LLC  
44 Beech Street  
Hallowell, ME 04347  
[barbalexand@gmail.com](mailto:barbalexand@gmail.com)  
*Consultant for OCA*

Roger Colton  
Fisher Sheehan & Colton  
34 Warwick Road  
Belmont, MA 02478  
[roger@fsconline.com](mailto:roger@fsconline.com)  
*Consultant for OCA*

Lisa Gumby  
[lgumby@pa.gov](mailto:lgumby@pa.gov)  
*Consultant for I&E*

Christine Wilson  
[cswilson@pa.gov](mailto:cswilson@pa.gov)  
*Consultant for I&E*

Joseph Kubas  
[jkubas@pa.gov](mailto:jkubas@pa.gov)  
*Consultant for I&E*

Ethan Cline  
[etcline@pa.gov](mailto:etcline@pa.gov)  
*Consultant for I&E*

DC Patel  
[dupatel@pa.gov](mailto:dupatel@pa.gov)  
*Consultant for I&E*

Vanessa Okum  
[vokum@pa.gov](mailto:vokum@pa.gov)  
*Consultant for I&E*

Christian Yingling  
[chryinglin@pa.gov](mailto:chryinglin@pa.gov)  
*Consultant for I&E*

Alicia Claypool  
[alclaypool@pa.gov](mailto:alclaypool@pa.gov)  
*Consultant for I&E*

Brian Kalcic  
d/b/a Excel Consulting  
7330 Dorset Avenue  
St. Louis, MO 63130  
[excel.consulting@sbcglobal.net](mailto:excel.consulting@sbcglobal.net)  
*Consultant for OSBA*

Kevin Higgins  
Energy Strategies  
111 East Broadway, Suite 1200  
Salt Lake City, UT 84111  
[khiggins@energystrat.com](mailto:khiggins@energystrat.com)  
*Consultant for OSBA*

Harry Geller  
118 Locust Street  
Harrisburg, PA 17101  
[hgeller@pautilitylawproject.org](mailto:hgeller@pautilitylawproject.org)  
*Consultant for CAUSE-PA*

## COMPLAINANTS

Mark Henderson (\*W / WW)  
5425 East Lorane Road  
Reading, PA 19606  
[markwh24@ptd.net](mailto:markwh24@ptd.net)

Anne Lockwood (\*WW)  
Michael Haehnel  
747 Florida Avenue  
York, PA 17404  
[alockwood039@protonmail.com](mailto:alockwood039@protonmail.com)

Leroy Bumbarger (\*WW)  
741 Lincoln Road  
Birdsboro, PA 19508  
[amybumbarger@gmail.com](mailto:amybumbarger@gmail.com)

Brian A. Gottschall (\*WW)  
327 Gibraltar Road  
Reading, PA 19606  
[mail@gottschall.org](mailto:mail@gottschall.org)

Amanda Johnsen (\*W / WW)  
6106 Pond View Drive  
Birdsboro, PA 19508  
[ajohnsen2@gmail.com](mailto:ajohnsen2@gmail.com)

Kirk Spencer (\*W)  
29 Greenwood Hills Drive  
Mountain Top, PA 18707  
[kspencer80@hotmail.com](mailto:kspencer80@hotmail.com)

Kathleen Schwartz (\*W / WW)  
205 Constitution Avenue  
Reading, PA 19606  
[dixie0418@verizon.net](mailto:dixie0418@verizon.net)

Adam Nemchick (\*W / WW)  
1106 Pepper Ridge Drive  
Reading, PA 19606  
[adam.nemchick@yahoo.com](mailto:adam.nemchick@yahoo.com)

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

Robert Ralls (\*W)  
254 Red Haven Road  
New Cumberland, PA 17070  
[rralls73@yahoo.com](mailto:rralls73@yahoo.com)

Jim Davidson (\*W)  
3804 Circle Avenue  
Reading, PA 19606  
[ifeel4u151@gmail.com](mailto:ifeel4u151@gmail.com)

Andrew Kulp (\*W)  
102 Hartline Drive  
Reading, PA 19606  
[andrewkulp@comcast.net](mailto:andrewkulp@comcast.net)

Natalie Rarick (\*W / WW)  
785 Lilac Lane  
Reading, PA 19606  
[natalierarick@aol.com](mailto:natalierarick@aol.com)

Richard Tawadros (\*W)  
802 Kennedy Court  
West Norriton, PA 19403-5250  
[rtawadros@pm.me](mailto:rtawadros@pm.me)

David Ross (\*W / WW)  
171 Scotland Drive  
Reading, PA 19606  
[evakoci@hotmail.com](mailto:evakoci@hotmail.com)

L. Scott and Tacy M. Rutherford (\*W / WW)  
60-2 Mint Tier  
Reading, PA 19606  
[scotacy@icloud.com](mailto:scotacy@icloud.com)

Anh Duong (\*W / WW)  
4697 Pheasant Run  
Reading, PA 19606  
[anhduo16@gmail.com](mailto:anhduo16@gmail.com)

Phyllis Connelly (\*W)  
71 Bushkill Court  
Reading, PA 19606  
[phyllisc@ptd.net](mailto:phyllisc@ptd.net)

Alecia M. Lilley (\*W / WW)  
8 Ptarmigan Drive  
Reading, PA 19606  
[amlcraft9@gmail.com](mailto:amlcraft9@gmail.com)

William Cameron and Linda Long (\*W)  
114 Murphy Circle  
Bushkill, PA 18324  
[oshundaze@yahoo.com](mailto:oshundaze@yahoo.com)

Michelle White (\*W / WW)  
16 Ptarmigan Drive  
Reading, PA 19606  
[mwarwhite324@gmail.com](mailto:mwarwhite324@gmail.com)

Lynn Mugno (\*W / WW)  
1102 Strawberry Run  
Reading, PA 19606  
[lynnmugno@gmail.com](mailto:lynnmugno@gmail.com)

Thomas Hollenbach (\*W)  
311 Lutz Drive  
Reading, PA 19606  
[thollenbach@comcast.net](mailto:thollenbach@comcast.net)

Darlene Hamilton (\*WW)  
4231 Lynn Avenue  
Reading, PA 19606  
[daramex1@yahoo.com](mailto:daramex1@yahoo.com)

Shanna Weagle (\*W)  
1754 Robson Drive  
Pittsburg, PA 15241  
[shannaweagle@gmail.com](mailto:shannaweagle@gmail.com)

Lynn DeAcosta (\*W / WW)  
4525 Delmar Drive  
Reading, PA 19606  
[daisflow@yahoo.com](mailto:daisflow@yahoo.com)

Jeff Henry (\*W / WW)  
4621 Hillside Road  
Reading, PA 19606  
[jeffhenry1@yahoo.com](mailto:jeffhenry1@yahoo.com)

Jennifer Dianna (\*W / WW)  
3307 Orchard View Road  
Reading, PA 19606  
[jdianna93@gmail.com](mailto:jdianna93@gmail.com)

Morgan Wengert (\*W / WW)  
5 Nancy Circle  
Reading PA, 19606  
[13wengert@gmail.com](mailto:13wengert@gmail.com)

Angelica Alvarez (\*W)  
13 North Savanna Drive  
Pottstown, PA 19465  
[aalvarez422@gmail.com](mailto:aalvarez422@gmail.com)

Devon Landis (\*W / WW)  
735 Lilac Lane  
Reading, PA 19606  
[dnlandis2021@gmail.com](mailto:dnlandis2021@gmail.com)

John Miller (\*W / WW)  
12 Elliot Drive  
Reading, PA 19606  
[millerjjm722@gmail.com](mailto:millerjjm722@gmail.com)

Laura Semel (\*W)  
501 West 1<sup>st</sup> Avenue  
Parkesburg, PA 19365  
[laurasemel@yahoo.com](mailto:laurasemel@yahoo.com)

Matthew Miller (\*W)  
4731 Doyle Road  
Pittsburgh, PA 15227-1309  
[millema3@verizon.net](mailto:millema3@verizon.net)

Christopher Blake (\*W / WW)  
133 Constitution Avenue  
Reading, PA 19606  
[changpinky@yahoo.com](mailto:changpinky@yahoo.com)

Patricia A. Finley (\*W / WW)  
28 Bent Brook Circle  
Reading, PA 19606  
[finleypatti@gmail.com](mailto:finleypatti@gmail.com)

Joseph Donahue (\*W)  
114 South Highland Drive  
Pittston, PA 18640  
[jdon3542@gmail.com](mailto:jdon3542@gmail.com)



---

Kenneth M. Kulak (Pa. No. 75509)  
Mark A. Lazaroff (Pa. No. 315407)  
Catherine G. Vasudevan (Pa. No. 210254)  
Brooke E. McGlinn (Pa. No. 204918)  
Morgan, Lewis & Bockius LLP  
2222 Market Street  
Philadelphia, PA 19103  
215.963.5384 (bus)  
215.963.5001 (fax)  
[ken.kulak@morganlewis.com](mailto:ken.kulak@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)

Dated: December 5, 2023

*Counsel for  
Pennsylvania-American Water Company*

**\*W – Filed a Water Complaint**  
**\*WW – Filed a Wastewater Complaint**