

Morgan Lewis

Kenneth M. Kulak

Partner

+1.215.963.5384

ken.kulak@morganlewis.com

December 22, 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. Office of Small Business Advocate**
 - a. Set II, Question Nos. 1-4
 - b. Set III, Question Nos. 1-4
- 2. Bureau of Investigation & Enforcement**
 - a. Set RB, Question Nos. 18-23
 - b. Set RS, Question Nos. 31-40

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

Enclosures

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

DB1/ 143072793.1

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**

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

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

Christopher M. Andreoli
Erin L. Gannon
Melanie J. El Atieh
David T. Evrard
Andrew J. Zerby
Office of Consumer Advocate
5th Floor Forum Place
555 Walnut Street
Harrisburg PA 17101-1923
CAndreoli@paoca.org
EGannon@paoca.org
MElAtieh@paoca.org
DEvrard@paoca.org
AZerby@paoca.org
Counsel for OCA

Carrie B. Wright
Bureau of Investigation and & Enforcement
Pennsylvania Public Utility Commission
Commerce Keystone Building
400 North Street, 2nd Floor
Harrisburg PA 17120
carwright@pa.gov
Counsel for I&E

Steven C. Gray
Rebecca Lyttle
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov
relyttle@pa.gov
Counsel for OSBA

Joseph L. Vullo
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
*Counsel for Commission on Economic
Opportunity*

Adeolu A. Bakare
Charis Mincavage
McNees Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17101
abakare@mcneeslaw.com
cmincavage@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
jsweet@pautilitylawproject.org
emarx@pautilitylawproject.org
lberman@pautilitylawproject.org
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

Sean M. Gallagher
Gallagher Law Group
110 East Diamond Street, Suite 101
Butler, PA 16001
smgallagher@gallagher.legal
Counsel for Cleveland-Cliffs Steel

CONSULTANTS – WITNESSES

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

David Garrett
Resolve Utility Consulting PLLC
101 Park Avenue, Suite 1125
Oklahoma City, OK 73102
dgarrett@resolveuc.com
Consultant for OCA

Jerome D. Mierzwa
Exeter Associates, Inc.
10480 Little Patuxent Parkway, Suite 300
Columbia, MD 21044
jmierzwa@exeterassociates.com
Consultant for OCA

Terry L. Fought
780 Cardinal Drive
Harrisburg, PA 17111
foughtbusiness@gmail.com
Consultant for OCA

Barbara Alexander
Barbara Alexander Consulting, LLC
44 Beech Street
Hallowell, ME 04347
barbalexand@gmail.com
Consultant for OCA

Roger Colton
Fisher Sheehan & Colton
34 Warwick Road
Belmont, MA 02478
roger@fsconline.com
Consultant for OCA

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

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

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

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

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

Vanessa Okum
vokum@pa.gov
Consultant for I&E

Christian Yingling
chryinglin@pa.gov
Consultant for I&E

Alicia Claypool
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
Consultant for OSBA

Kevin Higgins
Courtney Higgins
Shantell Garrett
Energy Strategies
111 East Broadway, Suite 1200
Salt Lake City, UT 84111
khiggins@energystrat.com
chiggins@energystrat.com
sgarrett@energystrat.com
Consultants for OSBA

Harry Geller
118 Locust Street
Harrisburg, PA 17101
hgeller@pautilitylawproject.org
Consultant for CAUSE-PA

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

Billie S. LaConte
Kitty A. Turner
J. Pollock, Inc.
bsl@jpollockinc.com
kat@jpollockinc.com
Consultants for PAWLUG

COMPLAINANTS

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

Leroy Bumbarger (*WW)
741 Lincoln Road
Birdsboro, PA 19508
amybumbarger@gmail.com

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

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

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

Jim Davidson (*W)
3804 Circle Avenue
Reading, PA 19606
ifeel4u151@gmail.com

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

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

Brian A. Gottschall (*WW)
327 Gibraltar Road
Reading, PA 19606
mail@gottschall.org

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

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

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

Andrew Kulp (*W / WW)
102 Hartline Drive
Reading, PA 19606
andrewkulp@comcast.net

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

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

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

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

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

Thomas Hollenbach (*W / WW)
311 Lutz Drive
Reading, PA 19606
thollenbach@comcast.net

Shanna Weagle (*W)
1754 Robson Drive
Pittsburg, PA 15241
shannaweagle@gmail.com

Jeff Henry (*W / WW)
4621 Hillside Road
Reading, PA 19606
jeffhenry1@me.com

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

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

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

Phyllis Connelly (*W)
71 Bushkill Court
Reading, PA 19606
phyllisc@ptd.net

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

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

Darlene Hamilton (*WW)
4231 Lynn Avenue
Reading, PA 19606
daramex1@yahoo.com

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

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

Angelica Alvarez (*W / WW)
13 North Savanna Drive
Pottstown, PA 19465
aalvarez422@gmail.com

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

Laura Semel (*W / WW)
501 West 1st Avenue
Parkesburg, PA 19365
laurasemel@yahoo.com

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

Joseph Donahue (*W)
114 South Highland Drive
Pittston, PA 18640
jdon3542@gmail.com

Dr. Mostafa Easa (*W)
1831 Pittston Avenue
Scranton, PA 18505
easaphd@gmail.com

Charles L. Heydt (*WW)
4580 Oley Turnpike Road
Reading, PA 19606
cheydt@ptd.net

Brian Dugas (*W)
10 Monument Avenue
Wyoming, PA 18644
briandugas54@gmail.com

William H. Rissmiller (*W / WW)
1006 Hickory Lane
Reading, PA 19606
whr19606@ptd.net

Mary Tanealian (*W / WW)
9240 Westwood Drive
Tobyhanna, PA 18466
mjt919@yahoo.com

Todd Blum (*W)
7000 Baptist Road
Bethel Park, PA 15102
toddblum4@gmail.com

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

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

Richard Peal (*W / WW)
5565 Fairway Drive North
Reading, PA 19606
manadirt@gmail.com

Anthony McCann (*W)
115 Lavra Lane
Royersford, PA 19468
anthonymccann@aol.com

Robert Bifano (*W)
121 Falcon Lane
Archbald, PA 18403
bbifano@gmail.com

Nicole Glimp (*W / WW)
8 Hearthstone Drive
Reading, PA 19606
nglimp@comcast.net

Tao Lu (*W / WW)
1309 Woodlawn Street
Dunmore, PA 18509
jeffluhousing@gmail.com

John P. Dolekary (*W)
6751 Smithfield Street
McKeesport, PA 15135
jpdoll961@gmail.com

Linda Allison (*WW)
522 Pacific Avenue
York, PA 17404
xdiver@verizon.net

Horace R. Battle (*W)
3 Roller Drive
Steelton, PA 17113
butterdog@comcast.net

Carl and Sharon Winter (*W / WW)
52 Emily Court
Reading, PA 19606
swwinter1@gmail.com

Raymond Volsario (*W)
501 Archers Mark
East Stroudsburg, PA 18301
rmv924@gmail.com

Danielle Gabriel (*W)
245 Lincoln Hall Road
Elizabeth, PA 15037
ddgabriel913@gmail.com

Michael D. Fletcher (*WW)
371 East Baumstown Road
Birdsboro, PA 19508
fletcher713@gmail.com

Donald D. Dickerson (*WW)
5405 East Lorane Road
Reading, PA 19606
3ds4us@gmail.com

Matthew and Melissa Mengel (*W)
515 North 7th Avenue
Royersford, PA 19468
melissam3000@yahoo.com

Amy E. Dalton n/b/m Ashcroft (*W / WW)
413 West Hemlock Avenue
Kane, PA 16735
amkr_dalton@comcast.net

Jay Phillips (*W)
73-4 Azalea Way
Reading, PA 19606
phillips2478@gmail.com

William R. Thomas (*W / WW)
1002 Santa Monica Drive
Port Vue, PA 15133
Pliska1150@comcast.net

Paul and Catherine Brown (*W / WW)
114 West 36th Street
Reading, PA 19606
ptbrown54@gmail.com

Jennifer Cohen (*W / WW)
4972 Quince Drive
Reading, PA 19606
jrudi415@gmail.com

Mallory and Glenn Kercher (*W / WW)
1113 Stonehenge Drive
Reading, PA 19606
mallory57@aol.com

Nicholas Orman (*W)
415 Hurst Street
Bridgeport, PA 19405
orman.nick@gmail.com

Tracy Cosgrove (*W / WW)
16 Prospect Avenue
Apartment #1 and #2
Scranton, PA 18505
tcosgrove07@hotmail.com

Robert M. Nowotarski (*W)
830 Woodchuck Lane
Reading, PA 19606
bnowotarski810@gmail.com

Carla Seidel (*W / WW)
110 Ashley Avenue
Reading, PA 19606
carla.seidel@gmail.com

Carl W. Tunall, Jr. (*W)
6103 Route 66
Kane, PA 16735
tbtunall@comcast.net

Mark Coogan (*WW)
1115 Monroe Avenue
Scranton, PA 18509
markcoogan1@gmail.com

Steven Solomon (*W)
1402 Gun Club Road
Uniontown, PA 15401
steve@seeamericanhomes.com

Debora A. Sokol (*W / WW)
4908 Mayapple Lane
Reading, PA 19606
dasokol825@yahoo.com

Robert Anderson (*W)
237 Regent Street
Bushkill, PA 18324
randerson6@gmail.com

Matthew Jordan (*W / WW)
5012 Quince Drive
Reading, PA 19606
kalel1015@gmail.com

Gary Sirois (*W / WW)
4902 Farming Ridge Boulevard
Reading, PA 19606
garygilmore99@gmail.com

Mr. and Mrs. Dennis McConnell (*WW)
10 Foxglove Lane
Reading, PA 19606
mtydj48@yahoo.com

Michelle Zebrowski (*W)
1704 Partridge Run Road
Pittsburgh, PA 15241
zachz.michellez@gmail.com

Joel Hernandez (*W / WW)
473 Pennsylvania Avenue
Reading, PA 19606
galtolin@yahoo.com

Borough of St. Lawrence, Berks County (*WW)
3540 St. Lawrence Avenue
Reading, PA 19606
stlawboro@ptd.net

Shaun Keperling (*W / WW)
460 Wingspread Court
Reading, PA 19606
keperling@ieee.org

Audrey Gerold (*W / WW)
131 Bayard Street
Kane, PA 16735
audrey.gerold@gmail.com

Cindy Cabrera (*W / WW)
355 West Newton Avenue
York, PA 17401
cbugg@hotmail.com

Carl J. Kupchunas (*W)
1451 Albright Avenue
Scranton, PA 18509
carlkup@comcast.net

Mary Chibatar (*W / WW)
800 West 8th Avenue
Parkesburg, PA 19365
marydella20@yahoo.com

Marie T. Ratchford-Demkosky (*WW)
2012 Rigg Street
Dunmore, PA 18512
mtrrd13@aol.com

Mary Ann Maro (*W)
1030 Bennett Street
Scranton, PA 18508
maryannmaro@comcast.net

Dan Nebeker on behalf of Coldwater
Lemoyne Carwash (*W)
402 South 3rd Street
Harrisburg, PA 17043
dan@coldwatercap.com

John J. Heilenman, Jr. (*W)
4961 Painted Sky Road
Reading PA 19606
jjheil@ptd.net

West Norriton Township (*W)
1630 West Marshall Street
West Norriton, PA 19403
jbobst@wntwp.com
sean@skilkennylaw.com
kailie@skilkennylaw.com

Daniel Bergey (*W)
4363 Prestwick Drive
Reading, PA 19606
dan09dan@aol.com

Nicholas Collette (*W)
426 Chestnut Way
New Cumberland, PA 17070
nickwcollette@hotmail.com

Daniel B. Fletcher (*WW)
244 South Baumstown Road
Birdsboro, PA 19508
fletchpcb@aol.com

Marie Sweeney (*W)
16 East Saylor Avenue
Plains, PA 18702
michael.sweeney806@comcast.net

Thalia Karalis (*W / WW)
4421 Green Tree Road
Reading, PA 19606
thalitsal@yahoo.com

Richard Matijasich (*W / WW)
128 Limestone Drive
Reading, PA 19606
rmatijasich@msn.com

Angela P. Kern (*W)
10 Kensington Circle
Uniontown, PA 15401
stanzorian@hotmail.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
mark.lazaroff@morganlewis.com
catherine.vasudevan@morganlewis.com
brooke.mcglinn@morganlewis.com

Dated: December 22, 2023

Counsel for
Pennsylvania-American Water Company

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