



McNees Wallace & Nurick LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166

**Adeolu A. Bakare**  
Direct Dial: 717.237.5290  
Direct Fax: 717.260.1744  
abakare@mcneeslaw.com

January 10, 2024

**VIA E-MAIL**

Kenneth M. Kulak, Esq.  
Catherine Vasudevan, Esq.  
Brooke E. McGlinn, Esq.  
Mark A. Lazaroff, Esq.  
Morgan, Lewis & Bockius, LLP  
1701 Market Street  
Philadelphia, PA 19103

Elizabeth Triscari Esq.  
Teresa K. Harrold Esq.  
Erin K. Fure, Esq.  
Pennsylvania American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055

**RE: Pennsylvania Public Utility Commission v. Pennsylvania-American Water Company;  
Docket Nos. R-2023-3043189; C-2023-3044871 (Water),  
Docket Nos. R-2023-3043190; C-2023-3044873 (Wastewater)**

Dear Counsel:

Attached please find the Pennsylvania-American Water Large Users Group ("PAWLUG") CONFIDENTIAL Interrogatories Set III to the Pennsylvania American Water Company ("PAWC"), in the above-referenced proceeding.

Please provide responses within ten (10) calendar days of service. Please also endeavor to forward responses in an organized manner as they are completed; it is not necessary to await completion of all responses prior to forwarding those completed more quickly.

As evidenced by the attached Certificate of Service, all parties to this proceeding are being duly served with a copy of this document. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a light blue horizontal line.

Adeolu A. Bakare  
MCNEES WALLACE & NURICK LLC

c: Rosemary Chiavetta, Secretary (via electronic filing, letter and certificate only)  
Certificate of Service

## CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of 52 Pa. Code Section 1.54 (relating to service by a participant).

### VIA E-MAIL

Elizabeth Triscari Esq.  
Teresa K. Harrold Esq.  
Erin K. Fure, Esq.  
PA-American Water Company  
852 Wesley Drive  
Mechanicsburg PA 17055  
[teresa.harrold@amwater.com](mailto:teresa.harrold@amwater.com)  
[elizabeth.triscari@amwater.com](mailto:elizabeth.triscari@amwater.com)  
[erin.fure@amwater.com](mailto:erin.fure@amwater.com)  
(Counsel for Pennsylvania-American Water Company)

Kenneth M. Kulak Esq.  
Catherine Vasudevan Esq.  
Brooke E. McGlinn Esq.  
Mark A. Lazaroff Esq.  
Morgan Lewis & Bockius LLP  
1701 Market Street  
Philadelphia PA 19103-2921  
[kkulak@morganlewis.com](mailto:kkulak@morganlewis.com)  
[cvasudevan@morganlewis.com](mailto:cvasudevan@morganlewis.com)  
[bmcglinn@morganlewis.com](mailto:bmcglinn@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)  
(Counsel for Pennsylvania-American Water Company)

Carrie B. Wright, Esq  
PA PUC Bureau of Investigation  
and Enforcement  
400 North Street  
Harrisburg PA 17120  
[carwright@pa.gov](mailto:carwright@pa.gov)  
(Counsel for I&E)

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

Christopher M. Andreoli, Esq.  
Andrew J. Zerby, Esq.  
Melanie El Atieh, Esq.  
David T. Evrard, Esq.  
Erin L. Gannon, Esq.  
Office of Consumer Advocate  
555 Walnut Street 5th Floor  
Forum Place  
Harrisburg PA 17101  
[OCAPAWC2023@paoca.org](mailto:OCAPAWC2023@paoca.org)  
(Counsel for Office of Consumer Advocate)

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

Certificate of Service

Page 2

Ria Pereira Esq.  
Lauren N. Berman, Esq.  
John W. Sweet, Esq.  
Elizabeth R. Marx, Esq.  
PA Utility Law Project 118 Locust Street  
Harrisburg PA 17101 717.710.3839  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)  
(Counsel for CAUSE-PA)

Kurt J. Boehm Esq.  
Jody Kyler Cohn Esq.  
Boehm Kurtz & Lowry  
36 E. 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)  
NO CONFIDENTIAL MATERIALS

Sean M. Gallagher, Esq.  
Gallagher Law Group  
110 East Diamond Street, Suite 101  
Butler, PA 16001  
[smgallagher@gallagher.legal](mailto:smgallagher@gallagher.legal)  
(Counsel for Cleveland-Cliffs Steel)  
NO CONFIDENTIAL MATERIALS

Joan E. London, Esq.  
Kozloff Stoudt, P.C.  
2640 Westview Drive  
Wyomissing, PA 19610  
[jlondon@kozloffstoudt.com](mailto:jlondon@kozloffstoudt.com)  
(Counsel for Borough of St. Lawrence)  
NO CONFIDENTIAL MATERIALS

J. Chadwick Schnee, Esq.  
Schnee Legal Services, LLC  
74 E. Main Street, #648  
Lititz, PA 17543  
[chadwick@schneelegal.com](mailto:chadwick@schneelegal.com)  
(Counsel for Exeter Township)  
NO CONFIDENTIAL MATERIALS

Karen O. Moury, Esq.  
Lauren M. Burge, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
600 Grant Street, 44<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)  
(Counsel for Victory Brewing Company)  
NO CONFIDENTIAL MATERIALS

Robert Ralls  
254 Red Haven Road  
New Cumberland, PA 17070  
[rralls73@yahoo.com](mailto:rralls73@yahoo.com)  
NO CONFIDENTIAL MATERIALS

Kyle Donahue  
621 Gibbons Street  
Scranton, PA 18505  
[Kyle.23.donahue@gmail.com](mailto:Kyle.23.donahue@gmail.com)  
NO CONFIDENTIAL MATERIALS



Adeolu A. Bakare

Counsel to the Pennsylvania-American Water  
Large Users Group

Dated this 10<sup>th</sup> day of January, 2023, at Harrisburg, Pennsylvania.