### **COMMONWEALTH OF PENNSYLVANIA**



PATRICK M. CICERO Consumer Advocate

OFFICE OF CONSUMER ADVOCATE 555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 (800) 684-6560

@pa\_oca
pennoca

FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

January 17, 2024

# **Via Electronic Mail Only**

Kenneth M. Kulak, Esquire
Brooke E. McGlinn, Esquire
Catherine Vasudevan, Esquire
Mark A. Lazaroff, Esquire
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
ken.kulak@morganlewis.com
brooke.mcglinn@morganlewis.com
catherine.vasudevan@morganlewis.com
mark.lazaroff@morganlewis.com

Re: Pennsylvania Public Utility Commission

V.

Pennsylvania-American Water Company Docket Nos. R-2023-3043189 (Water) R-2023-3043190 (Wastewater)

## Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set 29, in this matter. This document contains some **CONFIDENTIAL** information that is only being provided to Pennsylvania-American Water Company. Other parties who are parties to the Protective Agreement will have access to the full set of questions and responses, including confidential material, when those are posted in the Company's data room.

In accordance with the discovery modifications ordered at the Prehearing Conference held on January 3, 2024, we request Pennsylvania-American Water Company provide verified answers to these inquiries within ten (10) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed.

We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

Kenneth M. Kulak, Esquire Brooke E. McGlinn, Esquire Catherine Vasudevan, Esquire Mark A. Lazaroff, Esquire January 17, 2024 Page 2

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

# OCAPAWC2023@paoca.org

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,

Erin L. Gannon

Senior Assistant Consumer Advocate

Fix L. Harrow

PA Attorney I.D. # 83487

egannon@paoca.org

**Enclosures:** 

cc: PUC Secretary Rosemary Chiavetta (Letter and Certificate of Service Only)

Certificate of Service

4868-2143-2986

#### CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission

: Docket Nos. R-2023-3043189 (Water)

v. : R-2023-3043190 (Wastewater)

:

Pennsylvania-American Water Company

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Pennsylvania-American Water Company, Set 29, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below. This document was filed electronically on the Commission's electronic filing system.

Dated this 17th day of January, 2024.

## SERVICE BY E-MAIL ONLY

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

Elizabeth Rose Triscari, Esquire
Teresa K. Harrold, Esquire
Erin K. Fure, Esquire
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
elizabeth.triscari@amwater.com
teresa.harrold@amwater.com
erin.fure@amwater.com
Counsel for PAWC

Steven C. Gray, Esquire Rebecca Lyttle, Esquire Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101-1923 sgray@pa.gov relyttle@pa.gov Counsel for OSBA

Kenneth M. Kulak, Esquire
Brooke E. McGlinn, Esquire
Catherine Vasudevan, Esquire
Mark A. Lazaroff, Esquire
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
ken.kulak@morganlewis.com
brooke.mcglinn@morganlewis.com
catherine.vasudevan@morganlewis.com
mark.lazaroff@morganlewis.com
Counsel for PAWC

## SERVICE BY E-MAIL ONLY (continued)

Ria M. Pereira, Esquire Lauren N. Berman, Esquire John W. Sweet, Esquire Elizabeth R. Marx, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101 pulp@pautilitylawproject.org Counsel for CAUSE-PA

Kurt J. Boehm, Esquire Jody Kyler Cohn, Esquire Boehm, Kurtz, & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202 kboehm@bkllawfirm.com jkylercohn@bkllawfirm.com

Counsel for Cleveland-Cliffs Steel Joseph L. Vullo, Esquire Burke Vullo Reilly Roberts 1460 Wyoming Avenue Forty Fort, PA 18704 jlvullo@bvrrlaw.com Counsel for CEO

Joan E. London, Esquire Kozloff Stoudt, PC 2640 Westview Drive Wyomissing, PA 19610 jlondon@kozloffstoudt.com Counsel for Borough of St. Lawrence, Berks County

Karen O. Moury, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market St., 8<sup>th</sup> Floor Harrisburg, PA 17101 kmoury@eckertseamans.com Counsel for Victory Brewing Company Adeolu A. Bakare, Esquire Charis Mincavage, Esquire Ryan Block, Esquire McNees Wallace & Nurick LLC 100 Pine Street P.O. Box 1166 Harrisburg, PA 17108-1166 abakare@mcneeslaw.com cmincavage@mcneeslaw.com rblock@mcneeslaw.com Counsel for PAWLUG

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

J. Chadwick Schnee, Esquire Schnee Legal Services, LLC 74 E. Main Street, #648 Lititz, PA 17543 chadwick@schneelegal.com Counsel for Exeter Township

Robert K. Ralls 254 Red Haven Road New Cumberland, PA 17070 rralls73@yahoo.com

Kyle Donahue 621 Gibbons Street Scranton, PA 18505 kyle.23.donahue@gmail.com

Erin L. Gannon

Senior Assistant Consumer Advocate PA Attorney I.D. # 83487

Fix L. Garner

egannon@paoca.org

Melanie J. El Atieh Senior Assistant Consumer Advocate Christopher M. Andreoli David T. Evrard Andrew J. Zerby Assistant Consumer Advocates OCAPAWC2023@paoca.org

Counsel for:
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
717-783-5048

Dated: January 17, 2024