



February 1, 2024

**VIA E-MAIL**

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

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](mailto:ken.kulak@morganlewis.com)  
[brooke.mcglinn@morganlewis.com](mailto:brooke.mcglinn@morganlewis.com)  
[catherine.vasudevan@morganlewis.com](mailto:catherine.vasudevan@morganlewis.com)  
[mark.lazaroff@morganlewis.com](mailto:mark.lazaroff@morganlewis.com)

**Re: Pennsylvania Public Utility Commission v. Pennsylvania-American Water Company  
Docket Nos. R-2023-3043189 (water); R-2023-3043190 (wastewater)**

*CAUSE-PA Responses to PAWC-to-CAUSE-PA, Set I*

Dear Counsel:

Please find the attached **Responses of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) to Interrogatories of Pennsylvania-American Water Company (PAWC) to CAUSE-PA, Set I**, in the above noted proceeding.

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,

Ria M. Pereira, Esq.  
*Counsel for CAUSE-PA*

CC: *Certificate of Service*  
*Secretary Rosemary Chiavetta (Cover and COS only) – Via E-File*

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2023-3043189
	:	R-2023-3043190
Pennsylvania-American Water Company	:	

**Certificate of Service**

I hereby certify that I have this day served copies of the **Responses of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) to Interrogatories of Pennsylvania-American Water Company (PAWC) to CAUSE-PA, Set I**, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party), as modified by the Prehearing Order in this matter dated January 5, 2024, in the manner and upon the persons listed below.

**VIA Email**

Elizabeth Rose Triscari, Esquire Teresa K. Harrold, Esquire Erin K. Fure, Esquire Pennsylvania-American Water Company 852 Wesley Drive Mechanicsburg, PA 17055 <a href="mailto:elizabeth.triscari@amwater.com">elizabeth.triscari@amwater.com</a> <a href="mailto:teresa.harrold@amwater.com">teresa.harrold@amwater.com</a> <a href="mailto:erin.fure@amwater.com">erin.fure@amwater.com</a>	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 <a href="mailto:ken.kulak@morganlewis.com">ken.kulak@morganlewis.com</a> <a href="mailto:brooke.mcglinn@morganlewis.com">brooke.mcglinn@morganlewis.com</a> <a href="mailto:catherine.vasudevan@morganlewis.com">catherine.vasudevan@morganlewis.com</a> <a href="mailto:mark.lazaroff@morganlewis.com">mark.lazaroff@morganlewis.com</a>
Carrie B. Wright, Esquire Bureau of Investigation & Enforcement Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor Harrisburg, PA 17120 <a href="mailto:carwright@pa.gov">carwright@pa.gov</a>	Steven C. Gray, Esquire Rebecca Lyttle, Esquire Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101 <a href="mailto:sgray@pa.gov">sgray@pa.gov</a> <a href="mailto:relyttle@pa.gov">relyttle@pa.gov</a>
Andrew J. Zerby, Esquire David T. Evrard, Esquire	Joseph L. Vullo, Esquire Burke Vullo Reilly Roberts

<p>Erin L. Gannon, Esquire  Melanie J. El Atieh, Esquire  Christopher M. Andreoli, Esquire  David Evrard  Office of Consumer Advocate  555 Walnut Street  5th Floor, Forum Place  Harrisburg, PA 17101  <a href="mailto:AZerby@paoca.org">AZerby@paoca.org</a>  <a href="mailto:DEvrard@paoca.org">DEvrard@paoca.org</a>  <a href="mailto:EGannon@paoca.org">EGannon@paoca.org</a>  <a href="mailto:MElAtieh@paoca.org">MElAtieh@paoca.org</a>  <a href="mailto:candreoli@paoca.org">candreoli@paoca.org</a>  <a href="mailto:OCAPAWC2023@paoca.org">OCAPAWC2023@paoca.org</a></p>	<p>1460 Wyoming Avenue  Forty Fort, PA 18704  <a href="mailto:jlvullo@bvrrelaw.com">jlvullo@bvrrelaw.com</a></p>
<p>Kurt J. Boehm, Esq.  Jody Kyler Cohn, Esq.  BOEHM, KURTZ &amp; LOWRY  36 East Seventh Street, Suite 1510  Cincinnati, Ohio 45202  <a href="mailto:kboehm@bkllawfirm.com">kboehm@bkllawfirm.com</a>  <a href="mailto:jkylercohn@bkllawfirm.com">jkylercohn@bkllawfirm.com</a></p>	<p>Adeolu A. Bakare, Esq.  Charis Mincavage, Esq.  Ryan Block, Esq.  McNees Wallace &amp; Nurick, LLC  100 Pine Street  P.O. Box 1166  Harrisburg, PA 17108  <a href="mailto:ABakare@mcneeslaw.com">ABakare@mcneeslaw.com</a>  <a href="mailto:cmincavage@mcneeslaw.com">cmincavage@mcneeslaw.com</a>  <a href="mailto:rblock@mcneeslaw.com">rblock@mcneeslaw.com</a></p>
<p>Sean M. Gallagher, Esq.  Gallagher Law Group  110 East Diamond Street, Suite 101  Butler, PA 16001  <a href="mailto:smgallagher@gallagher.legal">smgallagher@gallagher.legal</a></p>	<p>Joan E. London, Esquire  Kozloff Stoudt, P.C.  2640 Westview Drive  Wyomissing, PA 19610  Counsel for Borough of St. Lawrence  <a href="mailto:jlondon@kozloffstoudt.com">jlondon@kozloffstoudt.com</a></p>
<p>J. Chadwick Schnee, Esq.  Schnee Legal Services, LLC  74 E. Main Street, #648  Lititz, PA 17543  <a href="mailto:chadwick@tucker-hull-law.com">chadwick@tucker-hull-law.com</a></p>	<p>Robert K. Ralls  254 Red Haven Road  New Cumberland, PA 17070  <a href="mailto:rralls73@yahoo.com">rralls73@yahoo.com</a></p>
<p>Kyle Donahue  <a href="mailto:kyle.23.donahue@gmail.com">kyle.23.donahue@gmail.com</a></p>	<p>Jessica Eskra, Esq.  Katherine Kennedy, Esq.  City of Scranton Law Department  340 North Washington Avenue  Scranton, PA 18503  <a href="mailto:jeskra@scrantonpa.gov">jeskra@scrantonpa.gov</a></p>

	<a href="mailto:kkennedy@scrantonpa.gov">kkennedy@scrantonpa.gov</a>
Karen O. Moury, Esquire Eckert Seamans Cherin & Mellott, LLC 213 Market St., 8th Floor Harrisburg, PA 17101 <a href="mailto:kmoury@eckertseamans.com">kmoury@eckertseamans.com</a>	Lauren M. Burge, Esquire Eckert Seamans Cherin & Mellott, LLC 600 Grant Street, 44th Floor Pittsburgh, PA 15219 <a href="mailto:lburge@eckertseamans.com">lburge@eckertseamans.com</a>

Respectfully Submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for CAUSE-PA*



Ria M. Pereira, Esq. PA ID: 316771  
 118 Locust Street  
 Harrisburg, PA 17101  
 717-710-3839  
[PULP@pautilitylawproject.org](mailto:PULP@pautilitylawproject.org)

February 1, 2024