



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

February 2, 2024

**Via Electronic Mail**

Kenneth M. Kulak, Esq.  
Brooke E. McGlinn, Esq.  
Catherine Vasudevan, Esq.  
Mark A. Lazaroff, Esq.  
Morgan, Lewis & Bockius LLP  
[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)

Elizabeth Rose Triscari, Esq.  
Teresa K. Harrold, Esq.  
Erin K. Fure, Esq.  
Pennsylvania-American Water Company  
[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)

Re: Pennsylvania Public Utility Commission v.  
Pennsylvania-American Water Company  
Docket Nos. R-2023-3043189 (Water)  
R-2023-3043190 (Wastewater)  
**I&E Responses to PAWC Interrogatories – Set I**

Dear Counsel:

Enclosed please find the following Responses of the Bureau of Investigation and Enforcement (I&E) to the Interrogatories of Pennsylvania-American Water Company - Set I in the above-captioned proceeding:

**I&E Response to PAWC Interrogatory Set I (no. 1) – Okum (w/attachments)**  
**I&E Response to PAWC Interrogatory Set I (no. 1) – Patel (w/attachment)**  
**I&E Response to PAWC Interrogatory Set I (no. 1) – Kubas (w/attachments)**  
**I&E Response to PAWC Interrogatory Set I (no. 1) – Cline (w/attachments)**

Copies are being served on parties of record per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Carrie B. Wright  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 208185  
(717) 783-6156  
[carwright@pa.gov](mailto:carwright@pa.gov)

Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter and Certificate of Service only – via e-file*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Responses to Interrogatories** dated February 2, 2024, in the manner and upon the persons listed below:

**Served via Electronic Mail Only**

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)  
*Counsel for PAWC*

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

Kenneth M. Kulak, Esq.  
Brooke E. McGlinn, Esq.  
Catherine Vasudevan, Esq.  
Mark A. Lazaroff, Esq.  
Morgan, Lewis & Bockius LLP  
2222 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)  
*Counsel for PAWC*

Andrew J. Zerby, Esq.  
Melanie J. El Atieh, Esq.  
David T. Evrard, Esq.  
Erin L. Gannon, Esq.  
Christopher M. Andreoli, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
[OCAPAWC2023@paoca.org](mailto:OCAPAWC2023@paoca.org)

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

Jerome D. Mierzwa  
Exeter Associates, Inc.  
10480 Little Patuxent Parkway, Suite 300  
Columbia, MD 21044  
[OCAPAWC2023@paoca.org](mailto:OCAPAWC2023@paoca.org)  
*Consultant for OCA*

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

Barbara Alexander  
Barbara Alexander Consulting, LLC  
44 Beech Street  
Hallowell, ME 04347  
[OCAPAWC2023@paoca.org](mailto:OCAPAWC2023@paoca.org)  
*Consultant for OCA*

Adeolu A. Bakare, Esq.  
Charis Mincavage, Esq.  
Ryan Block, Esq.  
McNees, Wallace & Nurick, LLC  
100 Pine Street  
P.O. Box 1166  
Harrisburg, PA 17108-1166  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[cmincavage@mcneeslaw.com](mailto:cmincavage@mcneeslaw.com)  
[rblock@mcneeslaw.com](mailto:rblock@mcneeslaw.com)  
*Counsel for PAWLUG*

David Garrett  
Resolve Utility Consulting PLCC  
101 Park Avenue, Suite 1125  
Oklahoma City, OK 73102  
[OCAPAWC2023@paoca.org](mailto:OCAPAWC2023@paoca.org)  
*Consultant for OCA*

Terry Fought  
780 Cardinal Drive  
Harrisburg, PA 17111  
[OCAPAWC2023@paoca.org](mailto:OCAPAWC2023@paoca.org)  
*Consultant for OCA*

Ralph C. Smith  
Mark S. Dady  
Megan Elias  
Dawn Bisdorf  
Larkin & Associates PLLC  
15728 Farmington Road  
Livonia, MI 48154  
[OCAPAWC2023@paoca.org](mailto:OCAPAWC2023@paoca.org)  
*Consultants for OCA*

Roger Colton  
Fisher Sheehan & Colton  
34 Warwick Road  
Belmont, MA 02478  
[OCAPAWC2023@paoca.org](mailto:OCAPAWC2023@paoca.org)  
*Consultant for OCA*

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

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*

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

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*

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

Jessica Eskra, Esq.  
Katherine Kennedy, Esq.  
City of Scranton Law Department  
340 North Washington Avenue  
Scranton, PA 18503  
[jeskra@scrantonpa.gov](mailto:jeskra@scrantonpa.gov)  
[kkennedy@scrantonpa.gov](mailto:kkennedy@scrantonpa.gov)  
*Counsel for City of Scranton*

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*

Karen O. Moury, Esq.  
Eckert Seamans Cherin & Mellott  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
*Counsel for Victory Brewing Company*

Kurt J. Boehm, Esq.  
Jody Kyler Cohn, Esq.  
Boehm, Kurtz & Lowry  
36 East 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*

Lauren M. Burge, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
600 Grant Street, 44<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)  
*Counsel for Victory Brewing Company*

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

Kyle Donahue  
621 Gibbons Street  
Scranton, PA 18505  
[kyle.23.donahue@gmail.com](mailto:kyle.23.donahue@gmail.com)

Richard Baudino  
J. Kennedy & Associates  
1347 Frye Road  
Westfield, NC 27053  
[rbaudino@jkenn.com](mailto:rbaudino@jkenn.com)  
*Consultant for Cleveland-Cliffs Steel*



---

Carrie B. Wright  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 208185  
(717) 783-6156  
[carwright@pa.gov](mailto:carwright@pa.gov)