

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

February 8, 2024

Via Electronic Mail Only

Jessica Eskra, Esquire
Katherine Kennedy, Esquire
340 North Washington Avenue
Scranton, PA 18503
jeskra@scrantonpa.gov
kkennedy@scrantonpa.gov
Counsel for City of Scranton

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 the Interrogatories of the Office of Consumer Advocate, Set 1 to City of Scranton, in this matter.

In accordance with the discovery modifications ordered at the Prehearing Conference held on January 3, 2024, we request the City of Scranton 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.

Jessica Eskra, Esquire
Katherine Kennedy, Esquire
February 8, 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
PA Attorney I.D. # 83487
egannon@paoca.org

Enclosures:

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

4866-2602-7162

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 the City of Scranton, Set 1, 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 8th day of February, 2024.

SERVICE BY E-MAIL ONLY

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

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

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

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
jlullo@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., 8th 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

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

Jessica Eskra
Katherine Kennedy
340 North Washington Avenue
Scranton, PA 18503
jeskra@scrantonpa.gov
kkennedy@scrantonpa.gov
Counsel for City of Scranton

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



Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
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: February 8, 2024