



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

February 21, 2024

Via Electronic Mail

Deputy Chief ALJ Christopher P. Pell
ALJ John M. Coogan
Pennsylvania Public Utility Commission
Office of Administrative Law Judge
cpell@pa.gov
jcoogan@pa.gov

Re: Pennsylvania Public Utility Commission v.
Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 (Water)
R-2023-3043190 (Wastewater)
I&E Rebuttal Testimony

Your Honors:

Enclosed please find the following prepared Rebuttal Testimony of the Bureau of Investigation and Enforcement's (I&E) witnesses in the above-captioned proceeding:

Vanessa Okum
D. C. Patel
Joseph Kubas

I&E Statement No. 1-R
I&E Statement No. 2-R
I&E Statement No. 3-R

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

CBW/ac
Enclosures

cc: Pamela McNeal, Legal Assistant (*via email* - pmcneal@pa.gov)
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 **Rebuttal Testimony** dated February 21, 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
teresa.harrold@amwater.com
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
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
brooke.mcglinn@morganlewis.com
catherine.vasudevan@morganlewis.com
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

Joseph L. Vullo, Esq.
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
Counsel for CEO

Jerome D. Mierzwa
Exeter Associates, Inc.
10480 Little Patuxent Parkway, Suite 300
Columbia, MD 21044
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
Counsel for CAUSE-PA

Barbara Alexander
Barbara Alexander Consulting, LLC
44 Beech Street
Hallowell, ME 04347
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
cmincavage@mcneeslaw.com
rblock@mcneeslaw.com
Counsel for PAWLUG

David Garrett
Resolve Utility Consulting PLCC
101 Park Avenue, Suite 1125
Oklahoma City, OK 73102
OCAPAWC2023@paoca.org
Consultant for OCA

Terry Fought
780 Cardinal Drive
Harrisburg, PA 17111
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
Consultants for OCA

Roger Colton
Fisher Sheehan & Colton
34 Warwick Road
Belmont, MA 02478
OCAPAWC2023@paoca.org
Consultant for OCA

Brian Kalcic
Excel Consulting
7330 Dorset Avenue
St. Louis, MO 63130
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
Counsel for Cleveland Cliffs Steel

Heller Geller
118 Locust Street
Harrisburg, PA 17101
hgeller@pautilitylawproject.org
Consultant for CAUSE-PA

Joan E. London, Esq.
Kozloff Stoudt, P.C.
2640 Westview Drive
Wyomissing, PA 19610
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
chiggins@energystrat.com
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
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
Counsel for Exeter Township

Karen O. Moury, Esq.
Eckert Seamans Cherin & Mellott
213 Market Street, 8th Floor
Harrisburg, PA 17101
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
jkylercohn@bkllawfirm.com
Counsel for Cleveland Cliffs Steel

Lauren M. Burge, Esq.
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
Counsel for Victory Brewing Company

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

Richard Baudino
J. Kennedy & Associates
1347 Frye Road
Westfield, NC 27053
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