COMMONWEALTH OF PENNSYLVANIA



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

PATRICK M. CICERO Consumer Advocate

February 23, 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

> 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 35, in this matter.

Re:

In accordance with the discovery modifications set forth in Prehearing Conference Order #1 issued on January 5, 2024, we request Pennsylvania-American Water Company provide verified answers to these inquiries within five (5) 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 February 23, 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,

Sinc L. Manner

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 Pennsylvania-American Water Company, Set 35, 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 23rd 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*

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., 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*

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

Kyle Donahue kyle.23.donahue@gmail.com

Sinc L. Garner

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 23, 2024