



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

February 24, 2025

Via Electronic Filing

Secretary Rosemary Chiavetta
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Pennsylvania Public Utility Commission v.
Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc.
Docket Nos. R-2024-3047822 & R-2024-3047824
I&E Answer to Petition for Reconsideration

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Bureau of Investigation and Enforcement Answer to the Petition for Reconsideration of Aqua Pennsylvania, Inc. in the above-captioned proceeding.

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

Sincerely,

A handwritten signature in black ink that reads 'Carrie B. Wright' with a stylized flourish at the end.

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

CBW/ac
Enclosures

cc: Administrative Law Judge Gail M. Chiodo (via email – gchiodo@pa.gov)
Administrative Law Judge Alphonso Arnold III (via email – alphonarno@pa.gov)
Office of Special Assistants (via email – ra-OSA@pa.gov)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

| | | |
|---|---|---------------------------|
| Pennsylvania Public Utility Commission, <i>et al.</i> | : | |
| | : | |
| v. | : | Docket No. R-2024-3047822 |
| | : | |
| Aqua Pennsylvania, Inc (Water) | : | |
| | | |
| Pennsylvania Public Utility Commission, <i>et al.</i> | : | |
| | : | |
| v. | : | Docket No. R-2024-3047824 |
| | : | |
| Aqua Pennsylvania Wastewater, Inc | : | |

**BUREAU OF INVESTIGATION AND ENFORCEMENT
ANSWER TO THE PETITION FOR RECONSIDERATION OF
AQUA PENNSYLVANIA, INC.**

I. INTRODUCTION

On May 23, 2024, Aqua Pennsylvania, Inc. (collectively Aqua or AP or the Company) on its own behalf and on behalf of its wholly-owned subsidiary Aqua Pennsylvania Wastewater, Inc., filed, respectively, Original Tariff Water - PA P.U.C. No. 4 (Tariff Water No. 4) and Original Tariff Sewer - PA P.U.C. No. 4 (Tariff Sewer No. 4) to become effective on Jul 22, 2024.¹ The Company’s proposed base rates will produce an increase in total annual operating revenues of \$126,675,472, or approximately 18.88% over the level of revenues at present rates anticipated for the fully projected future test year ending December 31, 2025.²

¹ Aqua Vol. 1, Statement of Specific Reasons for Proposed Rate Increase, p.1.

² *Id.*

The parties to this base rate proceeding are Aqua, the Commission’s Bureau of Investigation and Enforcement (I&E); the Office of Consumer Advocate (OCA); the Office of Small Business Advocate (OSBA); the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA); the Aqua Large Users Group (Aqua LUG); and SCH-USA. Additionally, there were dozens of formal complaints filed by Aqua ratepayers that were consolidated into this proceeding.

By Order entered on June 13, 2024, the Commission suspended the rate filings until February 22, 2025, and directed an investigation to determine the lawfulness, justness, and reasonableness of the rates, rules and regulations contained in this rate filing.

The matter was assigned to the Office of Administrative Law Judge, with Administrative Law Judges Gail Chiodo and Alphonso Arnold, III presiding, for the prompt scheduling of hearings to culminate in the issuance of a Recommended Decision. A Call-in Telephonic Prehearing Conference was held on June 17, 2024.

Pursuant to the established litigation schedule, I&E filed the following pieces of direct, rebuttal and surrebuttal testimony:

Zachari Walker

I&E Statement No. 1 (PROPRIETARY/Non-Proprietary)
I&E Exhibit No. 1 (PROPRIETARY/Non-Proprietary)
I&E Statement No. 1-R
I&E Statement No. 1-SR
I&E Exhibit No. 1-SR (PROPRIETARY/Non-Proprietary)

Christopher Keller

I&E Statement No. 2
I&E Exhibit No. 2
I&E Statement No. 2-R
I&E Statement No. 2-SR
I&E Exhibit No. 2-SR

Ethan Cline
I&E Statement No. 3
I&E Exhibit No. 3
I&E Statement No. 3-SR
I&E Exhibit No. 3-SR

During the course of this proceeding the parties held a series of settlement conferences and were able to amicably resolve most issues presented in this Aqua base rate proceeding. I&E submitted its Briefs related to the remaining unresolved issue related to the rates to be charged to East Whiteland customers.

On December 9, 2024, the ALJs issued a Recommended Decision (RD) which concluded that the rates to be charged to East Whiteland customers should not be increased and that the best course of action was to maintain the status quo for these customers.³ On February 6, 2025, the Commission issued its Order (February 6 Order) adopting the RD and agreeing that rates for East Whiteland customers should not increase.⁴ On February 14, 2025, Aqua filed a Petition for Partial Reconsideration and/or Clarification of the Commission's February 6 Order. In that Petition, Aqua requests the Commission reconsider or clarify whether Aqua will be able to implement new rates related to East Whiteland operations if the Pennsylvania Supreme Court reverses the Commonwealth Court's decision in *Cicero*.⁵

Pursuant to 52 Pa. Code Section 5.572(e), I&E hereby files this timely Answer requesting that the Commission deny the requested relief put forth in Aqua's Petition. Specifically, I&E requests that the Commission deny Aqua's request for partial reconsideration of its February 6 Order which denies a rate increase for East Whiteland

³ RD, p. 150.

⁴ Order, p. 136-142.

⁵ *Cicero v. Pa. P.U.C.*, 300 A.3d 1066 (Pa. Cmwlth., 2023).

customers. As explained below, as grounds for reconsideration, the Petition largely consists of argument raised in briefs and exceptions by Aqua that were already found to be unpersuasive by the Commission.

II. ANSWER TO PETITION

As further support to deny this Petition I&E offers the following comments in enumerated fashion:

1. Admitted.
2. Admitted.
3. Admitted. By way of further explanation, this closing occurred before the appeal period of the Commission's decision had ended, which put Aqua at risk of closing on an acquisition that would ultimately be reversed by the Commonwealth Court.
4. Admitted.
5. Admitted.
6. Admitted. It is admitted that OCA appealed the *East Whiteland Order* and that the Commonwealth Court reversed the Commission's decision by Order (the *Cicero* decision) entered July 31, 2023.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.
13. Admitted.

14. Admitted.

15. Admitted.

16. Admitted.

17. Admitted.

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted.

22. Admitted. It is admitted that there were specific terms contained in the settlement that discussed the specific rate effects for East Whiteland customers if the Commission determined rates should be increased for these customers. However, by way of clarification, the operative language of that settlement term was “If the Commission authorizes Aqua PA to include the East Whiteland system in its ratemaking rate base and permits the establishment of new rates **in this proceeding...**” (emphasis added). Here, the Commission determined that new rates for East Whiteland customers should not be established in this proceeding.

23. This paragraph largely contains a recitation of arguments made by Aqua in its briefs in this proceeding which speak for themselves and to which I&E has already responded in its own briefs and exceptions.

24. Admitted. I&E filed its Reply Brief on November 7, 2024, as well.

25. Admitted. It is admitted that the ALJs issued a Recommended Decision on December 9, 2024, that, among other things, concluded that the best course of action regarding East Whiteland rates was to maintain the status quo.

26. Admitted in part. It is admitted that various parties filed Exceptions and Replies to Exceptions on December 23, 2024, and December 30, 2024, respectively. The balance of this paragraph contains Aqua’s recitation of its argument in exceptions which speaks for itself.

27. The averments of this paragraph represent the findings of the Commission’s Order, which speaks for itself.

28. The averments of this paragraph represent a request for relief to which no response is required.

29. The averments in this paragraph are conclusions of law. No response is required. By way of further response, Aqua correctly states that the standards for granting a Petition for Amendment were set forth in *Duick*.⁶ Further, such petitions are likely to succeed only when they raise “new and novel arguments.” However, Aqua’s Petition for Reconsideration does not raise new and novel arguments. In fact, all the substantive issues raised in the Petition are already contemplated by the RD and the Commission’s February 6 Order. Therefore, this Petition for Reconsideration does not satisfy the *Duick* standards as the Aqua has simply restated the same arguments it presented throughout this case that the ALJ and Commission found unpersuasive.

30. The averments of this paragraph are conclusions of law. No response is required. However, by way of further explanation, the full quote of the Commission Order Aqua refers to states:

Petitions for reconsideration or amendment must show “new and novel arguments, not previously heard, or considerations which appear to have been overlooked or not addressed by the

⁶ *Duick v. Pa. Gas and Water Co.*, 56 Pa. P.U.C. 552, 559 (1982).

Commission.” *Duick* at 559. The last portion of this phase contains the operative language of the *Duick* standard – “by the Commission.” The *Duick* standard focuses on deliberations of the Commission -- not the arguments of parties.⁷

As evidenced therein, this does not change the fact that new and or novel arguments not previously heard or addressed by the Commission must form the basis for reconsideration.

As noted above, Aqua has not presented such arguments.

31. Denied. It is specifically denied that the RD and Commission Order do not address the effective date of rates if the Supreme Court reverse the Commonwealth Court’s *Cicero* decision. This is addressed inherently in the Commission’s position that the appropriate action is to maintain the status quo of rates. Which effectively acknowledges that if by the Company’s next base rate case, *Cicero* has been decided by the Supreme Court in Aqua’s favor, Aqua will then be able to potentially increase these customers rates. Repeatedly, both the RD and the February 6 Order speak to the ultimate decision from the Supreme Court regarding *Cicero*. Specifically, the February 6 Order states:

It is undisputed that there are multiple possible outcomes of the case on appeal, including that the Supreme Court could affirm the Commonwealth Court’s reversal of the Commission’s order. In that scenario, the *Cicero* decision reversing the Commission’s *East Whiteland Order* would be upheld, which would mean that Aqua does not have certificate authority to acquire and own the East Whiteland system or serve the customers of the system pursuant to the Code. Additionally, it is possible that the Supreme Court will reverse or modify *Cicero* and either remand for further proceedings or outright affirm the Commission’s East Whiteland Order. Both outcomes are possible, but neither is certain and cannot be presumed. However, it is clear, none of the possible outcomes at the Supreme Court will be known while this case is pending.⁸

⁷ *Pa. P.U.C. v PPL Elec. Util. Corp.* Docket No. R-20212-2290597 (Order entered May 14, 2014), p. 3.

⁸ Order, p. 138-139.

Moreover, the Commission's authority to grant Aqua's rate increase request for East Whiteland customers is arguable where Aqua's certificated authority to provide service is in question pending the *Cicero* appeal. At present, the Pennsylvania Supreme Court retains jurisdiction over the matters litigated in the *Cicero* appeal, which include Aqua's ability to acquire the wastewater assets of the East Whiteland system, service East Whiteland customers, and include the acquired assets in its ratemaking rate base at a certain valuation.⁹

Under these circumstances, we agree with the ALJs that the best course of action is to maintain the status quo of the existing East Whiteland rates until this issue is resolved with certainty. Aqua submits that waiting is unfair because it has been incurring expenses and investing in the East Whiteland system since closing on the transaction.

...Regarding Aqua's fairness argument, we agree with the ALJs that although Aqua was not prohibited from closing on the transaction before the expiration of the appeal period, in doing so, the Company assumed the risks of its actions.¹⁰

Even assuming, that the Commission did not ultimately address when Aqua could presumably increase these customers rates, the argument is easily addressed. Had Aqua had not prematurely closed on the East Whiteland system and assumed the risk of doing so, East Whiteland rates would not have been included in this base rate case by virtue of the *Cicero* ruling. Therefore, it is clear that Aqua's first opportunity to impose a rate increase on these customers will not be until it is clear that Aqua holds a valid certificate of public convenience (CPC) to own and operate the East Whiteland system. This is because it is not in the public interest to allow a public utility to increase rates for customers on a system it does not clearly own.

⁹ Order, p. 139.

¹⁰ Order, p.140-141.

As a result, no new or novel arguments have been presented and the *Duick* standard has not been met.

32. The averments of this paragraph largely represent the findings of the ALJs' RD and the Commission's Order, which speak for themselves.

33. The averments of this paragraph largely represent the findings of the ALJs' RD and the Commission's Order, which speak for themselves.

34. Denied. It is specifically denied that the Commission overlooked the impact that its ruling would have on Aqua. In addressing this "fairness" argument, the Commission explains, "We further agree with the ALJs that Aqua was in the best position to assess and choose its risk. It would be unfair to require East Whiteland customers to bear the risk of the Company's decision while the East Whiteland Order remained subject to appeal and modification or reversal."¹¹ The February 6 Order also explains that while refunds could be given if *Cicero* were overturned by the Supreme Court, this would require a full Commission proceeding pursuant to Section 1312 present significant administrative burdens and potential costs to the Commission, Aqua and the statutory advocates, and it would also deprive East Whiteland customers of the money paid to Aqua during those periods.¹²

35. Denied. As explained above, if Aqua had not chosen to close on this acquisition prematurely, it would not have been in this position. Had Aqua chose to wait until the appeal period had ended before closing, East Whiteland rates, would not have been a consideration until Aqua made a base rate filing in which its ownership of the system was

¹¹ Order, p. 141.

¹² Order, pp. 141-142.

certain. Aqua has created a problem for itself that it wants its customers to solve by paying rates that it is not clear are permitted.

36. This paragraph presents a request for relief to which no response is required. However, it must be noted that the Commission explained that there are multiple possible outcomes of the case on appeal, including that the Supreme Court could affirm the Commonwealth Court's reversal of the Commission's order which would mean that Aqua does not have a valid CPC convenience to acquire and own the East Whiteland system or serve the customers of the system pursuant to the Public Utility Code.¹³ Therefore, I&E submits it is not specifically the timing of the increase, but whether Aqua even holds a valid CPC for the East Whiteland system

37. Admitted in part and denied in part. While it is admitted the Commission rejected Aqua's argument, it is denied the Commission merely rejected this argument "in passing." As Aqua explains, the Commission clearly stated its unwillingness to speculate on the actual language of the Supreme Court's order, which would be required to rule in Aqua's favor on this issue.

38. Denied. It is denied the Commission failed to consider conditioning a rate increase upon the Supreme Court's decision in *Cicero*. As the Order explains, it is unclear at this time whether Aqua even holds a valid CPC for the East Whiteland system. Therefore, the Commission does not have the ability to authorize a rate increase for these customers.¹⁴

¹³ Order, p. 139.

¹⁴ Order, p. 139.

The premise behind the language Aqua proposes is neither new, nor novel. Specifically related to the language Aqua has presented in the instant Petition, the Commission determined the following:

Aqua makes the alternative argument that, if the Commission determines that the Company cannot increase rates to East Whiteland customers at this time and until the Supreme Court rules on the pending appeal, then the revenue increase agreed to in the Settlement should take effect immediately if the Supreme Court reverses the Commonwealth Court's decision in *Cicero*. Aqua Exc. at 11-12. Given the uncertainty of how the Supreme Court will rule in *Cicero* and the variety of possible outcomes, *see supra*, it would not be possible to craft a specific remedy because it would require speculation on the actual language of the ultimate order.¹⁵

It is clear from the language of the February 6 Order that the Commission specifically disagreed with the proposal Aqua presents and found it unpersuasive. There is nothing new or novel, nor any argument presented here which the Commission has not already heard and addressed.

39. Denied. As noted above, the Commission has already addressed and dismissed Aqua's proposal.

40. Denied. As explained above, the operative language of the settlement was "If the Commission authorizes Aqua PA to include the East Whiteland system in its ratemaking rate base and permits the establishment of new rates **in this proceeding...**" (emphasis added). Here the Commission has affirmatively answered the question of whether rates for East Whiteland customers can be increased by means of this proceeding and concluded that it is not possible to increase rates at this time.

¹⁵ Order, p. 143, fn 35.

41. Denied. Aqua already has a vehicle for increasing the East Whiteland rates should its CPC be found to be valid. That is, in the next base rate case in which it is determined that the CPC in question is valid, Aqua can request the Commission increase rates for these customers. This is the same process which would occur in any other proceeding involving an acquired utility in which the acquiring utility does not prematurely close on the acquisition. To be clear, this problem that Aqua is asking the Commission to solve is one solely of Aqua's own making that would not have occurred had it simply waited to close on the East Whiteland system.

42. Admitted in part, denied in part. It is admitted that if *Cicero* is reversed and the *East Whiteland Order* affirmed, Aqua could seek to increase rates in the next base rate case following that decision. However, it is specifically denied that Aqua must seek a substantially larger, single rate increase for these customers. While the Commission approves Aqua's rates, it is Aqua specifically who makes the rate request and is in control of the amount and frequency of those requests. Further, in ratemaking the concept of gradualism is often used to mitigate rate increases and there is no reason the concept would not apply to Aqua's future rate requests.

43. Admitted in part. It is admitted that in the settlement, a revenue requirement for the East Whiteland system was identified. However, as noted previously the operative language of that settlement term was "If the Commission authorizes Aqua PA to include the East Whiteland system in its ratemaking rate base and permits the establishment of new rates **in this proceeding...**" (emphasis added). Here, the Commission determined that new rates for East Whiteland customers should not be established in this proceeding.

44. The paragraph contains a request for relief to which no response is required.

III. CONCLUSION

For the reasons stated above, I&E respectfully requests that the Commission deny the Petition for Reconsideration of Aqua Pennsylvania, Inc. No new or novel arguments have been raised. Further, Aqua has not presented considerations which appear to have been overlooked or not addressed by the Commission. The instant Petition is merely a recitation of the positions Aqua set forth in testimony, briefs, and exceptions that were determined to be unpersuasive and dismissed by this Commission.

Respectfully submitted,

A handwritten signature in black ink that reads "Carrie B. Wright". The signature is written in a cursive style with a large, stylized "X" at the end.

Carrie B. Wright
Deputy Chief Prosecutor
Attorney ID No. 208185

Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street
Harrisburg, Pennsylvania 17120
(717) 783-6156

Dated: February 24, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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| Pennsylvania Public Utility Commission | : | |
| | : | |
| v. | : | Docket Nos. R-2024-3047822 |
| | : | R-2024-3047824 |
| Aqua Pennsylvania, Inc. and | : | |
| Aqua Pennsylvania Wastewater, Inc. | : | |

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Answer to Petition** dated February 24, 2025, in the manner and upon the persons listed below:

Served via Electronic Mail Only

Michael W. Hassell, Esq.
Garrett P. Lent, Esq.
Nicholas Stobbe, Esq.
Post & Schell
17 North Second Street, 12th Floor
Harrisburg, PA 17101-1601
mhassell@postschell.com
glent@postschell.com
nstobbe@postschell.com
Counsel for Aqua

Kimberly A. Joyce, Esq.
Alexander R. Stahl, Esq.
Aqua Pennsylvania
762 W. Lancaster Avenue
Bryn Mawr, PA 19010
kajoyce@essential.co
astahl@aquaamerica.com
Counsel for Aqua

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

Melanie Joy El Atieh, Esq.
Jacob D. Guthrie, Esq.
Katherine Kennedy, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
OCAAqua2024@paoca.org

Adeolu A. Bakare, Esq.
Harrison Ryan Block, Esq.
Charis Mincavage, Esq.
McNees Wallace & Nurick LLC
100 Pine Street
P. O. Box 1166
Harrisburg, PA 17108-1166
abakare@mcneeslaw.com
rblock@mcneeslaw.com
cmincavage@mcneeslaw.com
Counsel for Aqua Large Users Group

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

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

Renardo L. Hicks, Esq.
Bryce R. Beard, Esq.
Eckert Seamans Cherin & Mellott LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
rhicks@eckertseamans.com
bbeard@eckertseamans.com
Counsel for SCH USA, LLC

Karen O. Moury, Esq.
Carl R. Shultz, Esq.
Eckert Seamans Cherin & Mellott LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
kmoury@eckertseamans.com
cshultz@eckertseamans.com
Counsel for NWMA

Elana D. Schnall, Esq.
Scott T. Wyland, Esq.
Salzmann Hughes P.C.
1801 Market Street, Suite 300
Camp Hill, PA 17011
eschnall@salzmannhughes.com
swyland@salzmannhughes.com
*Counsel for Sandy Township, Treasure
Lake Property Owners Association, Inc.,
Barry Abbot & Richard Whitaker*

Christine Maloni Hoover
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101
OCAAqua2024@paoca.org
Witness for OCA

Ralph Smith
Larkin & Associates, PLLC
15728 Farmington Road
Livonia, MI 48152
OCAAqua2024@paoca.org
Witness for OCA

Brian Andrews
Brubaker and Associates, Inc.
P.O. Box 412000
St. Louis, MO 63141-2000
OCAAqua2024@paoca.org
Witness for OCA

Jason Hails
Quantiv Advisory LLC
925 Wappoo Road, Suite A
Charleston, SC 29407
j.hails@quantivadvisory.com
Witness for OSBA

Aaron L. Rothschild
Rothschild Financial Consulting
15 Lake Road
Ridgefield, CT 04364
OCAAqua2024@paoca.org
Witness for OCA

Roger Cathcart, CPA, CA, CBV
Cathcart Advisors Inc.
Financial Regulatory Advisors
300-330 St. Mary Avenue
Winnipeg, MB, R3C 3Z5
Canada
REMC@cathcartadvisors.com
Witness for OSBA

Jerome D. Mierzwa
Exeter Associates, Inc.
10480 Little Patuxent Pkwy, Suite 300
Columbia, MD 21044-3575
OCAAqua2024@paoca.org
Witness for OCA

Robert J. Fogarty
628 Fair Street
Nescopeck, PA 18635
rjf12@verizon.net

Roger Colton
Fisher, Sheehan & Colton
34 Warwick Road
Belmont, MA 02478
OCAAqua2024@paoca.org
Witness for OCA

Susan Unvasky and Sharon Ellis
151 Brook Street
Sugar Notch, PA 18706
sunvasky24@gmail.com

Barbara R. Alexander
44 Beech Street
Hallowell, ME 04347
OCAAqua2024@paoca.org
Witness for OCA

Steven Boyanowski
34 Willow Way
Dallas, PA 18612
judybccd@gmail.com

State Representative Christina Sappey
698 Unionville Road
Kennett Square, PA 19348
scooper@pahouse.net

John Day
614 Runyon Avenue
Piscataway, NJ 08854
john@johnday.us

A handwritten signature in cursive script that reads "Carrie B. Wright". The signature is written in black ink and is positioned above a horizontal line.

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