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August 20, 2018

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
PO Box 3265  
Harrisburg, PA 17105-3265

Re: PA PUC v. Pittsburgh Water and Sewer Authority  
Docket Nos. R-2018-3002645 and R-2018-3002647

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Pittsburgh Water and Sewer Authority's ("PWSA") Objections to United Interrogatories, Set IV, with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Daniel Clearfield

DC/lww  
Enclosure

cc: Certificate of Service w/enc.

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PWSA's Objections to United Interrogatories, Set IV upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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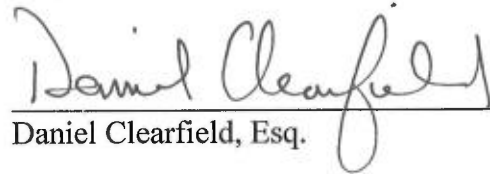
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Daniel Clearfield, Esq.

Dated: August 20, 2018

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, <i>et al.</i>	:	
	:	
v.	:	Docket No. R-2018-3002645, <i>et al.</i>
	:	
Pittsburgh Water and Sewer Authority - Water	:	
	:	
Pennsylvania Public Utility Commission, <i>et al.</i>	:	
	:	
v.	:	Docket No. R-2018-3002647, <i>et al.</i>
	:	
Pittsburgh Water and Sewer Authority -	:	
Wastewater	:	

**PITTSBURGH WATER AND SEWER AUTHORITY’S OBJECTIONS  
TO PITTSBURGH UNITED’S INTERROGATORIES, SET IV**

The Pittsburgh Water and Sewer Authority (“PWSA”) hereby objects to Pittsburgh United’s (United) Interrogatories Set IV, Questions 2-25 and 28-41 served on August 15, 2018. (PWSA communicated to Pittsburgh United its intention to object on August 17, 2018 consistent with the July 20, 2018 Prehearing Order). Without waiver of these objections, PWSA will attempt to respond to these questions to the extent that the question is not overly broad and/or burdensome.

**INTERROGATORIES**

United’s Interrogatories, set forth as Attachment “A” hereto, request extensive and detailed information concerning PWSA’s program of corrosion control as well as to identify and replace lead service lines and related facilities. In 2016, PWSA launched a lead line replacement program through its construction budget allocation and is in the process of implementing the “second year” of the 7% remaining lead service lines. More recently, PWSA has agreed to undertake a Private Lead Line Replacement Community Environmental Project (“CEP”) pursuant to a November 2017 Consent Order and Agreement Between PWSA and the Pennsylvania Department of Environmental Protection (“DEP”). As part of its efforts to respond

to lead levels, PWSA has also proposed an orthophosphate corrosion control plan, which is pending PA Department of Environmental Protection approval.

OBJECTIONS:

PWSA objects to United Set IV numbers 2-25 and 28-41 on the following grounds:

(a) United Set IV numbers 2-25 and 28-41 are beyond the scope of this proceeding and irrelevant. 52 Pa. Code § 5.321(c).

United Set IV numbers 2-25 and 28-41 ask extremely detailed questions that all relate to PWSA's present and future plans to remove and replace lead service line and associated equipment and to control corrosion in its system, which is viewed as being a significant cause of unacceptably high lead levels in drinking water. A detailed inquiry of this nature is well beyond the scope of this Tariff proceeding, the purpose of which is to set the rate levels for PWSA and to approve its initial Tariff. In its Final Implementation Order ("FIO"), the PUC directed that PWSA's Compliance Plan shall include "a plan to address lead levels in the water supply and the replacement of lead service lines... ." FIO, pg. 45, Ordering Paragraph 6. The PUC's FIO also stated that

While the Commission will provide stakeholders with flexibility to coordinate issues between the tariff filings and compliance plans, the Commission nevertheless expects stakeholders to address and develop issues related to public health and safety in detail in the compliance plans. Namely, while PWSA may address the issue in its water tariff filing, the Commission directs PWSA to develop and propose a comprehensive plan to address lead levels in its water supply and the replacement of lead service lines as a part of its water operations and infrastructure comprehensive plan.<sup>1</sup>

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<sup>1</sup> FIO at 32 (emphasis added).

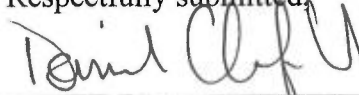
As such these detailed questions about PWSA's lead service line replacement program and its corrosion control program (directly related to the lead level issue) are neither relevant to the subject matter of this proceeding (the reasonableness of PWSA's rate increase and the reasonableness of its initial Tariff) and are not reasonably calculated to lead to the discovery of admissible evidence. Importantly, PWSA has not objected to, and will seek to answer United Set IV-1 and 26-27, which appears to request information about the budgeted amounts for lead service line replacement and corrosion control that are contained in PWSA's Future Test Year ("FTY") and Fully Projected Future Test Year ("FPFTY"). It is obvious that the rest of United's questions in Set IV do not deal in any way with the FTY or FPFTY expenditures (they fail to even bother to tie into PWSA's FPFTY claims) but instead are designed to "audit" the PWSA efforts (which, importantly, have already been fully reviewed and directed by another agency – DEP).

(b) United Set IV-2-25 and 28-41 are unreasonably burdensome and would require an expensive special investigation. 52 Pa. Code § 5.361(a)(2), (4).

A review of the questions shows that many demand detailed and extensive data about PWSA's lead service line efforts and corrosion control efforts. Moreover, several of these questions would require an extremely time consuming and difficult effort to produce in the form demanded by United. PWSA's initial estimate is that it would take several weeks, and scores of hours to locate the information demanded and to produce it in the form demanded for several of the questions .

Notwithstanding these objections, and without waiver thereof, in an effort to be cooperative PWSA will attempt to answer all of the questions in Set IV, to the extent that they can reasonably be responded to. Moreover, this cooperative production is without waiver of its position that the review of PWSA's lead service line program and corrosion control program has been directed by the PUC to occur in its Compliance Plan proceeding.

Respectfully submitted,



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Dated: August 20, 2018

Counsel for  
The Pittsburgh Water and Sewer Authority

## Attachment A

- UNITED IV-2.** Please describe the construction status of PWSA's orthophosphate corrosion control treatment system. (PWSA RAW-1, at 12; PWSA RAW-3, at 10; Consent Order ¶ 3.b.iii.)
- UNITED IV-3.** When does PWSA expect to complete the construction of its orthophosphate corrosion control treatment system? (PWSA RAW-1, at 12; PWSA RAW-3, at 10; Consent Order ¶ 3.b.iii.)
- UNITED IV-4.** Please provide copies of all documents related to PWSA's amended construction permit to construct the orthophosphate corrosion control treatment system, including PWSA's application for and any permits issued by DEP. (See PWSA RAW-1, at 12; Consent Order ¶ 3.b.iii.)
- UNITED IV-5.** Please provide a copy of Construction Permit No. 0216544. (Consent Order ¶ K.)
- UNITED IV-6.** Please provide itemized budgets for the operation of PWSA's orthophosphate corrosion control treatment system for 2018 and 2019. (See PWSA DML-3, at 4.)
- UNITED IV-7.** When does PWSA expect to begin operating its orthophosphate corrosion control treatment system? (PWSA St. 1, at 10; Consent Order ¶ 3.b.iii.)
- UNITED IV-8.** Please provide copies of all documents related to expected lead levels (both short- and long-term) after PWSA begins operating its orthophosphate corrosion control treatment system.
- UNITED IV-9.** Please provide a copy of Operation Permit No. 0217533. (Consent Order ¶ K.)
- UNITED IV-10.** Please provide a copy of Public Water Supply Permit No. 465W001-TC-C1. (Consent Order ¶ F.)
- UNITED IV-11.** Please provide a copy of PWSA's Lead Loop Study to select a chemical corrosion system, as submitted to DEP. (PWSA RAW-1, at 3.) Please provide any correspondence between PWSA and DEP relating to the Lead Loop Study.
- UNITED IV-12.** Please provide all monitoring data collected during PWSA's Lead Loop Study for the following water quality parameters: dissolved lead concentrations, total lead concentrations, pH, alkalinity, chlorine concentration, and orthophosphate concentration.
- UNITED IV-13.** Please describe PWSA's new Distribution System Flushing Program to enable chemical treatment including orthophosphate. (PWSA RAW-1, at



8.) Please provide any correspondence between PWSA and DEP relating to the Distribution System Flushing Program.

- UNITED IV-14.** Please provide a copy of PWSA's corrosion control feasibility study, approved by DEP on July 26, 1995. (Consent Order ¶ F.)
- UNITED IV-15.** Please provide a copy of the corrosion control treatment feasibility study plan and schedule submitted to DEP on May 24, 2016. (Consent Order ¶ I.)
- UNITED IV-16.** Please provide a copy of DEP's comments on PWSA's corrosion control treatment feasibility study plan and schedule, submitted to PWSA on June 24, 2016. (Consent Order ¶ I.)
- UNITED IV-17.** Please provide a copy of PWSA's revised corrosion control treatment feasibility study plan dated July 14, 2016. (Consent Order ¶ I.)
- UNITED IV-18.** Please provide any interim and final reports submitted to DEP relating to the corrosion control treatment feasibility study referenced at UNITED IV-15 to 17. (Consent Order ¶ 3.b.i.)
- UNITED IV-19.** Did DEP notify PWSA of any deficiencies in the corrosion control treatment feasibility study? (Consent Order ¶ 3.b.i.) If so, please describe the deficiencies and PWSA's efforts to address them, and provide any correspondence between PWSA and DEP regarding DEP's notice(s) of deficiencies.
- UNITED IV-20.** Please provide DEP's letter, received by PWSA on April 27, 2018, approving the selection of orthophosphate as optimal corrosion control treatment. (See UNITED II-1 Att. W.)
- UNITED IV-21.** Please describe and provide any other studies PWSA conducted or relied on concerning the use of orthophosphate treatment to manage lead corrosion. (See PWSA St. 1, at 10.)
- UNITED IV-22.** Has PWSA evaluated the impacts from its April 2014 change in corrosion control chemicals? (Consent Order ¶¶ H, I). If yes, please describe the impacts, including any impacts on lead levels in PWSA's water system and any financial impacts to PWSA's past, ongoing, and future operations. If no, please explain why not.
- UNITED IV-23.** Please describe the water quality parameter performance requirements currently applicable to PWSA's corrosion control treatment system. (Consent Order ¶ 3.b.iv.)
- UNITED IV-24.** Please provide monthly reports of all water quality parameter monitoring data collected by PWSA since January 1, 2018.
- UNITED IV-25.** Has DEP designated optimal water quality control parameters for PWSA as described in 40 C.F.R § 141.81(d)(6)? If so, please describe this designation, including when it occurred.

- UNITED IV-28.** Please provide the results of PWSA's lead and copper monitoring conducted between July 1, 2016 and December 31, 2016. (Consent Order ¶ N.) Please include a breakdown of the total number of sites tested, the location of each site, and the monitoring result for each site.
- UNITED IV-29.** Please provide the results of PWSA's lead and copper monitoring conducted between January 1, 2017 and June 30, 2017. (Consent Order ¶ N.) Please include a breakdown of the total number of sites tested, the location of each site, and the monitoring result for each site.
- UNITED IV-30.** Please provide the results of PWSA's lead and copper monitoring conducted between July 1, 2017 and December 31, 2017. Please include a breakdown of the total number of sites tested, the location of each site, and the monitoring result for each site.
- UNITED IV-31.** Please provide the results of PWSA's lead and copper monitoring conducted between January 1, 2018 and June 30, 2018. Please include a breakdown of the total number of sites tested, the location of each site, and the monitoring result for each site.
- UNITED IV-32.** Please describe PWSA's plans for the July 1, 2018 through December 31, 2018 lead and copper monitoring period. Please include a breakdown of the total number of sites to be tested, the location of each site, any sampling schedules, and any monitoring results collected to date.
- UNITED IV-33.** Describe the sample collection methods PWSA uses to conduct lead and copper monitoring. (See 40 C.F.R. § 141.86(b).) Please provide copies of all written instructions PWSA distributes to customers that collect samples for PWSA's lead and copper monitoring program.
- UNITED IV-34.** Does PWSA have a pool of targeted sampling sites for lead and copper monitoring? (See 40 C.F.R. § 141.86(a)(1).) If yes, how did it create this pool?
- UNITED IV-35.** How does PWSA verify that its sampling pool for lead and copper monitoring targets homes with a high risk of lead contamination? (See 40 C.F.R. § 141.86(a)(3)-(8).)
- UNITED IV-36.** Does PWSA use the same sampling pool for each monitoring period? (See 40 C.F.R. § 141.86(b)(4).) If not, please explain why not.
- UNITED IV-37.** How does PWSA choose sampling sites within its sampling pool? (See 40 C.F.R. § 141.86(b)(4).)

- UNITED IV-38.** If PWSA does not collect a tap water sample in the next monitoring period from the same sampling site from which it collected a previous sample, how does PWSA select the replacement site? (See 40 C.F.R. § 141.86(b)(4).)
- UNITED IV-39.** Please provide all 72-hour post-construction sample results collected since April 21, 2018. (See UNITED II-1 Att. W, at Att. C.)
- UNITED IV-40.** Please provide copies of the directions included with the bottles distributed to customers to collect 72-hour post-construction samples. (See UNITED II-1 Att. AA.)
- UNITED IV-41.** Please provide itemized budgets for 2018 and 2019 for the collection of post-construction samples following lead service line replacement. (See UNITED II-70; UNITED II-1 Att. W, at Att. C.)