

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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October 18, 2018

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

Re: Implementation of Chapter 32 of the Public
Utility Code Re Pittsburgh Water and Sewer
Authority
Docket Nos. M-2018-2640802 (water)
M-2018-2640803 (wastewater)

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Notice of Intervention and Public Statement in the above-referenced proceeding.

Copies have been served per the attached Certificate of Service.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lauren M. Burge".

Lauren M. Burge
Assistant Consumer Advocate
PA Attorney I.D. 311570
E-Mail: LBurge@paoca.org

Enclosures:

cc: Office of Administrative Law Judge
Certificate of Service
*260884

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Implementation of Chapter 32 of the	:	Docket No. M-2018-2640802 (water)
Public Utility Code Re Pittsburgh Water	:	Docket No. M-2018-2640803 (wastewater)
And Sewer Authority	:	

NOTICE OF INTERVENTION

Pursuant to 52 Pa. Code Sections 5.71-74, the Office of Consumer Advocate hereby gives Notice of Intervention in the above-captioned proceeding. A copy of all correspondence and notices, documents, orders or other communications with respect to the above-captioned proceeding should be addressed to the following:

Christine Maloni Hoover
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Erin L. Gannon
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Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lauren M. Burge", written over a horizontal line.

Lauren M. Burge
Assistant Consumer Advocate
PA Attorney I.D. # 311570

Dated: October 18, 2018

260877

PUBLIC STATEMENT OF THE
OFFICE OF CONSUMER ADVOCATE
PURSUANT TO 71 P.S. SECTION 309-4(e)

Act 161 of the Pennsylvania General Assembly, 71 P.S. Section 309-2, as enacted July 9, 1976, authorizes the Consumer Advocate to represent the interests of consumers before the Pennsylvania Public Utility Commission (Commission). In accordance with Act 161, and for the following reasons, the Acting Consumer Advocate determined to file an Intervention and participate in proceedings before the Commission involving the Pittsburgh Water and Sewer Authority's (PWSA or the Authority) Petition for Approval of its Compliance Plan (Compliance Plan), filed pursuant to Section 3204(b) and (c) of the Public Utility Code, 66 Pa. C.S. § 3204(b), (c), and the Commission's Final Implementation Order entered March 15, 2018.¹

On September 28, 2018, PWSA filed its Compliance Plan with the Commission. PWSA also concurrently filed its Long-Term Infrastructure Improvement Plan (LTIIP) on September 28, 2018.² The proposed Compliance Plan presents PWSA's understanding of its current status of compliance with all aspects of the Public Utility Code and Commission regulations, including, *inter alia*: water, wastewater, and stormwater systems and operations; financial and accounting practices; customer service practices; billing practices; metering; lead service line replacements and addressing lead levels in water; unaccounted for water; and stormwater. For areas where PWSA is not currently in compliance, the Compliance Plan also includes proposals to bring PWSA operations and practices into compliance with the Public Utility Code and Commission regulations.

¹ Implementation of Chapter 32 of the Public Utility Code re Pittsburgh Water and Sewer Authority, Final Implementation Order, Docket Nos. M-2018-2640802 (water) and M-2018-2640803 (wastewater) (Order entered Mar. 18, 2018); see also Implementation of Chapter 32 of the Public Utility Code Re Pittsburgh Water and Sewer Authority, Tentative Implementation Order, Docket Nos. M-2018-2640802 (water) and M-2018-2640803 (wastewater) (Order entered Jan. 18, 2018).

² See Appendix C to PWSA's Compliance Plan; see also Petition of Pittsburgh Water and Sewer Authority for Approval of its Long-Term Infrastructure Improvement Plan, Docket No. P-2018-3005037.

The OCA has determined to intervene and participate in this proceeding in order to protect the interests of PWSA's customers. Through its participation in this proceeding, the OCA seeks to ensure that customers receive high quality water and wastewater service at reasonable cost, and that all aspects of PWSA's operations are brought into full compliance with the Public Utility Code and Commission regulations.

CERTIFICATE OF SERVICE

Re: Implementation of Chapter 32 of the : Docket Nos. M-2018-2640802 (w)
Public Utility Code Re. Pittsburgh : M-2018-2640803 (ww)
Water and Sewer Authority :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Notice of Intervention and Public Statement, 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:

Dated this 18th day of October 2018.

SERVICE BY E-MAIL and INTER-OFFICE MAIL

Gina L. Miller, Esquire
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Dated: October 18, 2018
*260890