



COMMONWEALTH OF PENNSYLVANIA

October 22, 2018

Daniel Clearfield, Esquire  
Carl R. Shultz, Esquire  
Deanne M. O'Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101

Pamela C. Polacek, Esquire  
Adeolu A. Bakare, Esquire  
Alessandra L. Hylander, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108

**Re: Pennsylvania Public Utility Commission, *et al.* v. Pittsburgh Water & Sewer Authority – Water & Wastewater /  
Docket Nos. R-2018-3002645 *et al.* & R-2018-3002647 *et al.***

Dear Counsel:

Enclosed please find the Responses of the Office of Small Business Advocate ("OSBA"), to Pittsburgh Water & Sewer Authority's Interrogatories, Set I, in the above-referenced proceedings.

Copies of these Responses to Interrogatories will be served upon all parties, as indicated on the attached Certificate of Service. Additionally, this Certificate of Service has been electronically filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission, as required by 52 Pa. Code § 5.341(b).

If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Elizabeth Rose Triscari  
Deputy Small Business Advocate  
Attorney ID No. 306921

***Enclosures***

cc: PA PUC Secretary Rosemary Chiavetta (Cover Letter & Certificate of Service only)  
Brian Kalcic  
Parties of Record

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission, et. al.</b>	:	
	:	
<b>v.</b>	:	<b>R-2018-3002645 et al.</b>
	:	<b>C-2018-3003388</b>
<b>Pittsburgh Water &amp; Sewer Authority – Water</b>	:	
	:	
	:	
<b>Pennsylvania Public Utility Commission, et. al.</b>	:	
	:	
<b>v.</b>	:	<b>R-2018-3002647 et al.</b>
	:	<b>C-2018-3003384</b>
<b>Pittsburgh Water &amp; Sewer Authority –</b>	:	
<b>Wastewater</b>	:	

**CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of the foregoing have been served via email and/or First-Class mail (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Christine M. Hoover, Esquire  
Erin L. Gannon, Esquire  
Lauren M. Burge, Esquire  
Office of Consumer Advocate  
555 Walnut Street, 5th Floor  
Harrisburg, PA 17101  
[OCAPWSA2018@paoca.org](mailto:OCAPWSA2018@paoca.org)  
(Counsel for OCA)  
(Email and Hand Delivery)

Ashley E. Everette  
Scott Rubin  
Terry Fought, P.E.  
Barbara R. Alexander  
Roger D. Colton  
[OCAPWSA2018@paoca.org](mailto:OCAPWSA2018@paoca.org)  
(Expert Witnesses for OCA)  
(Via Email Only)

Gina L. Miller, Esquire  
John M. Coogan, Esquire  
Bureau of Investigation & Enforcement  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17120  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)  
[jcoogan@pa.gov](mailto:jcoogan@pa.gov)  
(Counsel for BIE)  
(Email and Hand Delivery)

Daniel Clearfield, Esquire  
Carl R. Shultz, Esquire  
Deanne M. O'Dell, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[cshultz@eckertseamans.com](mailto:cshultz@eckertseamans.com)  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
(Counsel for PWSA)

Elizabeth R. Marx, Esquire  
John W. Sweet, Esquire  
Patrick M. Cicero, Esquire  
Kadeem G. Morris, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)  
(Counsel for Pittsburgh United)

Dimple Chaudhary, Esquire  
Peter J. DeMarco, Esquire  
Cecilia Segal, Esquire  
Jared J. Thompson, Esquire  
Natural Resources Defense Council  
1152 15<sup>th</sup> Street, NW, Suite 300  
Washington, DC 20005  
[dchaudhary@nrdc.org](mailto:dchaudhary@nrdc.org)  
[pdemarco@nrdc.org](mailto:pdemarco@nrdc.org)  
[csegal@nrdc.org](mailto:csegal@nrdc.org)  
[jared.thompson@nrdc.org](mailto:jared.thompson@nrdc.org)  
(Counsel for Pittsburgh United)

Mitchell Miller  
Mitch Miller Consulting LLC  
60 Geisel Road  
Harrisburg, PA 17112  
[Mitchmiller77@hotmail.com](mailto:Mitchmiller77@hotmail.com)  
(Expert Witness for Pittsburgh United)

Daniel G. Vitek, Esquire  
The Community Justice Project  
100 Fifth Avenue, Suite 900  
Pittsburgh, PA 15222  
[dvitek@cjplaw.org](mailto:dvitek@cjplaw.org)  
(Expert Witness for Pittsburgh United)

Bruce Lanphear, M.D., M.P.H.  
Simon Fraser University  
Office BLU 9514  
8888 University Drive  
Burnaby, B.C. V5A 1S6  
Canada  
[bruce\\_lanphear@sfu.ca](mailto:bruce_lanphear@sfu.ca)  
(Expert Witness for Pittsburgh United)

Gregory J. Welter, PE, BCEE  
O'Brien & Gere  
4201 Mitchellville Road, #500  
Bowie, MD 20716  
[Greg.Welter@obg.com](mailto:Greg.Welter@obg.com)  
(Expert Witness for Pittsburgh United)

Aly Shaw  
Pittsburgh United  
841 California Avenue  
Pittsburgh, PA 15212  
[aly@pittsburghunited.org](mailto:aly@pittsburghunited.org)  
(Expert Witness for Pittsburgh United)

Susan Simms Marsh, Esquire  
Pennsylvania-American Water Company  
800 West Hersheypark Drive  
Hershey, PA 17033  
[susan.marsh@amwater.com](mailto:susan.marsh@amwater.com)  
(Counsel for PAWC)

Michael A. Gruin, Esquire  
Stevens & Lee  
17 North Second Street, 16<sup>th</sup> Floor  
Harrisburg, PA 17101  
[mag@stevenslee.com](mailto:mag@stevenslee.com)  
(Counsel for PAWC)

David P. Zambito, Esquire  
Jonathan P. Nase, Esquire  
Cozen O'Connor  
17 North Second Street, Suite 1410  
Harrisburg, PA 17101  
[dzambito@cozen.com](mailto:dzambito@cozen.com)  
[jnase@cozen.com](mailto:jnase@cozen.com)  
(Counsel for Peoples Natural Gas Company)

William H. Roberts II, Esquire  
PNG Companies LLC  
375 North Shore Drive  
Pittsburgh, PA 15212  
[william.h.robertsii@peoples-gas.com](mailto:william.h.robertsii@peoples-gas.com)  
(Counsel for Peoples Natural Gas Company)

Pamela C. Polacek, Esquire  
Adeolu A. Bakare, Esquire  
Alessandra L. Hylander, Esquire  
McNees Wallace & Nurick LLC  
100 Pine Street  
PO Box 1166  
Harrisburg, PA 17108  
[ppolacek@mcneeslaw.com](mailto:ppolacek@mcneeslaw.com)  
[abakare@mcneeslaw.com](mailto:abakare@mcneeslaw.com)  
[ahylander@mcneeslaw.com](mailto:ahylander@mcneeslaw.com)  
(Counsel for PWSA)

DATE: October 22, 2018

Tishekia Williams, Esquire  
Michael Zimmerman, Esquire  
Emily M. Farah, Esquire  
Duquesne Light Company  
411 Seventh Avenue, 15<sup>th</sup> Floor  
Pittsburgh, PA 15219  
[twilliams@duqlight.com](mailto:twilliams@duqlight.com)  
[mzimmerman@duqlight.com](mailto:mzimmerman@duqlight.com)  
[efarah@duqlight.com](mailto:efarah@duqlight.com)  
(Counsel for Duquesne)

  
Elizabeth Rose Triscari  
Deputy Small Business Advocate  
Attorney ID No. 306921