

Deanne M. O'Dell  
717.255.3744  
dodell@eckertseamans.com

January 25, 2019

**Via Email and First Class Mail**

Gina L. Miller, Esq.  
John M. Coogan, Esq.  
Bureau of Investigation & Enforcement  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

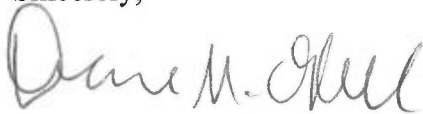
Re: Implementation of Chapter 32 of the Public Utility Code RE: Pittsburgh Water  
and Sewer Authority; Docket Nos. M-2018-2640802 and M-2018-2640803

Dear Counsel:

Enclosed please find Pittsburgh Water and Sewer Authority's ("PWSA") Responses to Bureau of Investigation and Enforcement's ("I&E") Interrogatories **RE-1 through RE-24 and RR-1 through RR-7** with regard to the above-referenced matters. Please note some responses are *confidential* and should be handled accordingly. Hard copies to be served in accordance with the attached Certificate of Service.

The discovery responses including the attachments (if any) are available at ESCM Share File site. To receive access, please contact Deanne O'Dell (dodell@eckertseamans.com) or 717-255-3744 and provide the name and email address of the person seeking access.

Sincerely,



Deanne M. O'Dell

DMO/lww  
Enclosure

cc: Cert. of Service w/enc.  
Rosemary Chiavetta, (COS only)

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the PWSA's Responses to I&E Interrogatories, RE-1 through RE-24 and RR-1 through RR-7 upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

### Via Email and/or First Class Mail

Sharon Webb, Esq.  
Erin K. Fure, Esq.  
Office of Small Business Advocate  
300 North Second St., Suite 202  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)  
[efure@pa.gov](mailto:efure@pa.gov)

\*Christine Maloni Hoover, Esq.  
\*Lauren M. Burge, Esq.  
\*Erin L. Gannon, Esq.  
Office of Consumer Advocate  
555 Walnut St., 5<sup>th</sup> Fl., Forum Place  
Harrisburg, PA 17101-1923  
[choover@paoca.org](mailto:choover@paoca.org)  
[lburge@paoca.org](mailto:lburge@paoca.org)  
[egannon@paoca.org](mailto:egannon@paoca.org)

\*Gina L. Miller, Esq.  
\*John M. Coogan, Esq.  
Bureau of Investigation & Enforcement  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)  
[jcoogan@pa.gov](mailto:jcoogan@pa.gov)

\*Elizabeth R. Marx, Esq.  
\*John Sweet, Esq.  
\*Patrick M. Cicero, Esq.  
\*Kadeem G. Morris, Esq.  
The Pennsylvania Utility Law Project  
118 Locust St.  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

\*Susan Simms Marsh, Esq.  
Pennsylvania-American Water Company  
800 West Hersheypark Drive  
Hershey, PA 17033  
[Susan.marsh@amwater.com](mailto:Susan.marsh@amwater.com)

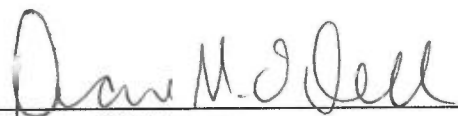
\*Michael A. Gruin, Esq.  
Stevens & Lee  
17 North Second St., 16<sup>th</sup> Fl.  
Harrisburg, PA 17101  
[mag@stevenslee.com](mailto:mag@stevenslee.com)

Michelle Nacarati Chapkis  
Mayor's Blue Ribbon Panel on  
Restructuring the PWSA Care of Women for  
a Healthy Environment  
5877 Commerce St.  
Pittsburgh, PA 15206

Dimple Chaudhary, Esquire  
Peter J. DeMarco, Esquire  
Cecilia Segal, Esquire  
Natural Resources Defense Council  
1152 15th Street, NW, Ste. 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)

\* To receive Confidential material

Dated: January 25, 2019

  
Deanne O'Dell, Esq.