



# COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION P.O. BOX 3265, HARRISBURG, PA 17105-3265

May 6, 2019

Michael A. Gruin, Esq. Stevens & Lee 17 North Second Street, 16th Floor Harrisburg, PA 17101

Re: Implementation of Chapter 32 of the Public Utility Code Regarding Pittsburgh Water and

Sewer Authority – Stage 1 Petition of the Pittsburgh Water and Sewer Authority for

Approval of Its Long-Term Infrastructure Improvement Plan

Docket Nos. M-2018-2640802 & M-2018-2640803

Dear Mr. Gruin,

Enclosed please find two (2) copies of the Bureau of Investigation & Enforcement's (I&E) **Interrogatories** – **I&E-RE-36** and **I&E-RE-37**. Please restate each interrogatory before responding and start each interrogatory and response on a separate page. The responses should identify the responding persons.

The responses to these interrogatories are due within ten (10) calendar days pursuant to the Prehearing Conference Order entered on December 27, 2018. Please provide two (2) copies of your responses and forward them to my attention at Commonwealth Keystone Building, 400 North Street, Harrisburg, PA 17120.

If you have any questions, please contact me at (717) 787-8754.

Gina L. Miller

ncerely

Prosecutor

Bureau of Investigation & Enforcement

PA Attorney I.D. #313863

GLM/seb Enclosure

cc: Secretary Chiavetta (Cover Letter & COS Only)

Per Certificate of Service

### **BEFORE THE** PENNSYLVANIA PUBLIC UTILITY COMMISSION

Implementation of Chapter 32 of the Public Utility Code Regarding Pittsburgh Water and

Sewer Authority – Stage 1 Petition of the

Docket Nos. M-2018-2640802 M-2018-2640803 Pittsburgh Water and Sewer Authority for

Approval of Its Long-Term Infrastructure Improvement Plan

### **CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing Interrogatories - I&E-RE-36 and

I&E-RE-37on May 6, 2019, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by party):

## Served via First Class and Electronic Mail

Daniel Clearfield, Esq. Deanne M. O'Dell, Esq. Karen O. Moury, Esq. Carl R. Schultz, Esq. Sarah D. Stoner, Esq. Eckert Seamans Cherin & Mellott LLC 213 Market Street, 8th Floor Harrisburg, PA 17101 dclearfield@eckertseamans.com dodell@eckertseamans.com Counsel for Pittsburgh Water & Sewer Authority

Lauren M. Burge, Esq. Christine Maloni Hoover, Esq. Erin L. Gannon, Esq. Office of Consumer Advocate 555 Walnut Street, 5th Floor Forum Place Harrisburg, PA 17101 lburge@paoca.org choover@paoca.org egannon@paoca.org

Sharon E. Webb, Esq. Erin K. Fure, Esq. Office of Small Business Advocate 300 North Second Street, Suite 202 Harrisburg, PA 17101 swebb@pa.gov efure@pa.gov

Michael A. Gruin, Esq. Stevens & Lee 17 North Second Street, 16th Floor Harrisburg, PA 17101 mag@stevenslee.com Counsel for Pennsylvania-American Water Company

Linda R. Evers, Esq. Stevens & Lee 111 North Sixth Street P.O. Box 679 Reading, PA 19601 lre@stevenslee.com Counsel for Pennsylvania-American Water Company

Susan Simms Marsh, Esq.
Pennsylvania-American Water Company
800 Hersheypark Drive
Hershey, PA 17033
susan.marsh@amwater.com

Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Patrick M. Cicero, Esq.
Kadeem G. Morris, Esq.
PA Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Counsel for Pittsburgh United

Peter DeMarco, Esq.
Dimple Chaudhary, Esq.
Cecilia Segal, Esq.
Natural Resources Defense Council
1152 15th Street Northwest, Suite 300
Washington DC 20005
pdemarco@nrdc.org
dchaudhary@nrdc.org
csegal@nrdc.org

Michelle Naccarati Chapkis Mayor's Blue Ribbon Panel on Restructuring the PWSA c/o Women for a Healthy Environment 5877 Commerce Street Pittsburgh, PA 15206

#### Served via E-mail

Ashley E. Everette
Office of Consumer Advocate
aeverette@paoca.org

Gina L. Miller

Prosecutor

Bureau of Investigation & Enforcement

PA Attorney I.D. #313863