COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560

April 7, 2020

Via Electronic Mail Only

Daniel Clearfield, Esquire
Deanne O'Dell, Esquire
Eckert, Seamans, Cherin, & Mellott, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101

Re: Pennsylvania Public Utility Commission

v.

Pittsburgh Water and Sewer Authority Docket Nos. R-2020-3017951 (Water)

C-2020-3019348

R-2020-3017970 (Wastewater)

C-2020-3019349

Dear Counsel:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set VII, in the above-referenced proceedings.

In accordance with the Commission's Rules of Practice and Procedure, we request that PWSA provide verified answers to these inquiries within fifteen (15) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultants, as listed below:

Karl R. Pavlovic PCMG and Associates, LLC. 22 Brookes Avenue Gaithersburg, MD 20877

E-Mail: OCAPWSA2020@paoca.org

Daniel Clearfield, Esquire Deanne O'Dell, Esquire April 7, 2020 Page 2

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code § 5.341(b).

Sincerely,

/s/ Christine Maloni Hoover Christine Maloni Hoover Senior Assistant Consumer Advocate PA Attorney I.D. # 50026 E-Mail: CHoover@paoca.org

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service only) Certificate of Service

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CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission : Docket Nos. R-2020-3017951 (Water)

v. : C-2020-3019348

: R-2020-3017970 (Wastewater)

Pittsburgh Water and Sewer Authority : C-2020-3019349

I hereby certify that I have this day served a true copy of the following documents, the Office of Consumer Advocate's Interrogatories to Pittsburgh Water and Sewer Authority, Set VII, 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 7th day of April 2020.

SERVICE BY E-MAIL ONLY

Gina L. Miller, Esquire
John M. Coogan, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Deanne M. O'Dell, Esquire Daniel Clearfield, Esquire Eckert, Seamans, Cherin, & Mellott, LLC 213 Market Street 8th Floor Harrisburg, PA 17101

Brian Kalcic Excel Consulting 225 S. Meramec Avenue Suite 720 T St. Louis, MO 63105 Sharon E. Webb, Esquire Erin K. Fure, Esquire Daniel G. Asmus, Esquire Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101-1923

Ria M. Pereira, Esquire Elizabeth R. Marx, Esquire John W. Sweet, Esquire Pennsylvania Utility Law Project 118 Locust Street Harrisburg, PA 17101

/s/ Christine Maloni Hoover

Christine Maloni Hoover Senior Assistant Consumer Advocate PA Attorney I.D. # 50026

E-Mail: CHoover@paoca.org

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Erin L. Gannon

Senior Assistant Consumer Advocate

PA Attorney I.D. # 83487 E-Mail: <u>EGannon@paoca.org</u>

Counsel for:

Office of Consumer Advocate

555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 Phone: (717) 783 5048

Phone: (717) 783-5048 Fax: (717) 783-7152 Dated: April 7, 2020

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