

COMMONWEALTH OF PENNSYLVANIA PENNSYLVANIA PUBLIC UTILITY COMMISSION COMMONWEALTH KEYSTONE BUILDING 400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF INVESTIGATION & ENFORCEMENT

April 7, 2020

Via Electronic Mail

Deanne M. O'Dell, Esq.
Daniel Clearfield, Esq.
Eckert Seamans Cherin & Mellott LLC
dodell@eckertseamans.com
dclearfield@eckertseamans.com

Re: Pennsylvania Public Utility Commission v.

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

R-2020-3017970 (Wastewater)

I&E Data Requests

Dear Attorney O'Dell:

Enclosed please find a copy of the Bureau of Investigation & Enforcement's (I&E) **Data Requests** – **I&E-RE-1-D through I&E-RE-45-D - Patel.** Please restate each Data Request before responding and start each Data Request and response on a separate page. The responses should identify the responding persons.

The responses to these Data Requests are due within fifteen (15) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please forward your responses via email to ginmiller@pa.gov and jcoogan@pa.gov.

Consistent with Paragraph 8 of the Commission's March 20, 2020 Emergency Order at Docket No. M-2020-3019262 (Re: Suspension of Regulatory and Statutory Deadlines; Modification to Filing and Service Requirements), electronic copies only are being served on all active parties of record as evidenced in the attached Certificate of Service. If you have any questions, please do not hesitate to contact me.

Respectfully,

Gina L. Miller Prosecutor

Bureau of Investigation and Enforcement

PA Attorney ID No. 313863

(717) 787-8754

ginmiller@pa.gov

GLM/ac Enclosures

cc: Secretary Rosemary Chiavetta (via e-file, cover letter and Certificate of Service Only)

Per Certificate of Service

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission

:

v. : Docket Nos. R-2020-3017951 (Water)

R-2020-3017970 (Wastewater)

Pittsburgh Water and Sewer Authority

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Data Requests** dated April 7, 2020 in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

Served via Electronic Mail Only

Deanne M. O'Dell, Esq. Daniel Clearfield, Esq. Eckert Seamans Cherin & Mellott LLC

dodell@eckertseamans.com dclearfield@eckertseamans.com

Christine Maloni Hoover, Esq.

Erin L. Gannon, Esq. Lauren E. Guerra, Esq. Office of Consumer Advocate

choover@paoca.org
egannon@paoca.org

lguerra@paoca.org

Sharon Webb, Esq. Erin K. Fure, Esq. Daniel G. Asmus, Esq.

Office of Small Business Advocate

swebb@pa.gov efure@pa.gov dasmus@pa.gov Elizabeth R. Marx, Esq. John W. Sweet, Esq.

Ria Pereira

The Pennsylvania Law Utility Project

pulp@palegalaid.net

Counsel for Pittsburgh UNITED

Michael A. Gruin, Esq.

Stevens & Lee

<u>mag@stevenslee.com</u> Counsel for PAWC

Dimple Chaudhary, Esq. Peter J. DeMarco, Esq.

Cecilia Segal, Esq.

Natural Resources Defense Council

dchaudhary@nrdc.org pdemarco@nrdc.org csegal@nrdc.org

Gina L. Miller

Prosecutor

PA Attorney ID No. 313863