COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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April 10, 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 IX, 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:

Terry L. Fought 780 Cardinal Drive Harrisburg, PA 17111

E-Mail: OCAPWSA2020@paoca.org

Daniel Clearfield, Esquire Deanne O'Dell, Esquire April 10, 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)

> C-2020-3019348 v.

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 IX, 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 10th 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

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/s/ Christine Maloni Hoover

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Counsel for: Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923

Phone: (717) 783-5048 (717) 783-7152 Fax: Dated: April 10, 2020

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