

WILLIAM PEDUTO
MAYOR



YVONNE HILTON
CITY SOLICITOR

CITY OF PITTSBURGH
DEPARTMENT OF LAW
CITY-COUNTY BUILDING

April 20, 2020

VIA E-FILE

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

Re: PA Public Utility Commission v. Pittsburgh Water and Sewer Authority
Docket Nos. M-2018-2640802, M-2018-2640803, P-2018-3005037, P-2018-3005039

Dear Secretary Chiavetta,

Enclosed for filing, please find The City of Pittsburgh's Joinder in the Petition of the Pittsburgh Water and Sewer Authority for Reconsideration, Clarification and/or Amendment of the Commission's March 26, 2020 Final Order in the above noted proceedings. Copies have been served in accordance with the attached Certificate of Service.

Respectfully submitted,

/s/ Yvonne S. Hilton
City Solicitor

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Implementation of Chapter 32 of the	:	Docket No. M-2018-2640802
Public Utility Code Re Pittsburgh	:	M-2018-2640803
Water and Sewer Authority—Stage 1	:	

Petition of Pittsburgh Water and Sewer	:	Docket No. P-2018-3005037
Authority for Approval of Its Long-Term	:	P-2018-3005039
Infrastructure Improvement Plan	:	

**THE CITY OF PITTSBURGH’S JOINDER IN THE PETITION OF THE
PITTSBURGH WATER AND SEWER AUTHORITY FOR RECONSIDERATION,
CLARIFICATION AND/OR AMENDMENT OF THE COMMISSIONS’S MARCH
26, 2020 FINAL ORDER**

City of Pittsburgh

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April 20, 2020

The City of Pittsburgh (the “City”) hereby joins in the Petition of the Pittsburgh Water and Sewer Authority (the “PWSA”) for Reconsideration, Clarification and/or Amendment of the Commission’s March 26, 2020 Final Order and in support thereof, the City states the following:

1. On September 28, 2018, the PWSA filed its petition with the Commission for approval of its Compliance Plan at Docket Nos. M-2018-2640802 (water) and M-2018-2640803 (sewage) and its Long-Term Infrastructure Improvement Plan at Docket Nos. P-2018-3005037 (water) and P-2018-3005039 (sewage). The Commission consolidated these proceedings.

2. On March 26, 2020, the Commission issued a Final Order in the aforementioned proceedings.

3. On or about April 9, 2020, the City filed its Petition to Intervene in these proceedings.

4. Thereafter, on or about April 10, 2020, the City filed its Petition for Reconsideration

5. As set forth more fully in the City’s Petition to Intervene (filed April 9, 2020) and Petition for Reconsideration and/or Supersedeas (filed April 10, 2020), the City owns the water and sewer system operated by the PWSA.

6. On or about April 10, 2020, the PWSA filed its Petition for Reconsideration, Clarification and/or Amendment of the Commission’s March 26, 2020 Final Order (“PWSA Petition”).

7. The City hereby joins in the PWSA Petition, specifically joining in the PWSA’s Request for Reconsideration of Two Litigated Issues—Residency and City of Pittsburgh

Unmetered Issues, which are set forth in the PWSA Petition, pages 5 through 21, paragraphs 6 through 44.

WHEREFORE, the City respectfully joins paragraphs 6 through 44 in the Petition filed by the PWSA on April 10, 2020.

Respectfully submitted,

/s/ Yvonne S. Hilton, Esquire
City Solicitor

City of Pittsburgh
City of Pittsburgh Department of Law
City-County Building, Suite 313
414 Grant Street
Pittsburgh, PA 15219

Date: April 20, 2020

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Implementation of Chapter 32 of the	:	Docket No.	M-2018-2640802
Public Utility Code Re Pittsburgh	:		M-2018-2640803
Water and Sewer Authority—Stage 1	:		
Petition of Pittsburgh Water and Sewer	:	Docket No.	P-2018-3005037
Authority for Approval of Its Long-Term	:		P-2018-3005039
Infrastructure Improvement Plan	:		

Certificate of Service

I hereby certify that I have this day served copies of **The City of Pittsburgh’s Joinder in the Petition of the Pittsburgh Water and Sewer Authority for Reconsideration, Clarification and/or Amendment of the Commission’s March 26, 2020 Final Order** upon the parties and interested stakeholders in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

VIA EMAIL

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Respectfully submitted,

/s/Yvonne S. Hilton, Esquire
City Solicitor