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October 7, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary PA Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265

Re: PA Public Utility Commission et al., v. Pittsburgh Water and Sewer Authority - Water Docket Nos. R-2020-3017951et al.;

PA Public Utility Commission et al., v. Pittsburgh Water and Sewer Authority – Wastewater, Docket Nos. R-2020-3017970 et al., and

Petition of Pittsburgh Water and Sewer Authority For Waiver of Provisions of Act 11 to Increase the DSIC CAP, to Permit Levelization of DSIC Charges, and to Authorize the Pay-As-You-Go Method of Financing – Docket No. P-2020-3019019

Dear Secretary Chiavetta:

Enclosed herein, please find a corrected page 9 of the Joint Petition for Settlement filed by the Pittsburgh Water and Sewer Authority ("PWSA") on September 30, 2020. The correction changes "FERC" in paragraph E.1 to NARUC. PWSA respectfully requests this corrected page 9 replace the one included with the original filing. Also note that this correction is in addition to the errata filed on October 6, 2020 correcting page 3 of the Joint Petition and page 5 of Appendix A.

I apologize for any inconvenience this may have caused. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

anne M. O'Dell

Deanne M. O'Dell DMO/lww Enclosure cc: Hon. Mary Long w/out enc. Hon. Emily Devoe w/out enc. Cert. of Service w/out enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PWSA's Letter and Corrected Pages (Second Errata) upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

<u>Via Email</u>

Sharon Webb, Esq. Erin K. Fure, Esq. Office of Small Business Advocate Forum Place Building 555 Walnut Street, 1st Floor Harrisburg, PA 17101 <u>swebb@pa.gov</u> efure@pa.gov

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CERTIFICATE OF SERVICE

Donald Kuhn 5827 Kentucky Ave Pittsburgh PA 15232 *Complainant C-2020-3021065 and C-2020-3021067* donaldjkuhn@gmail.com

Dated: October 7, 2020

Deanne M. O'Dell

Deanne M. O'Dell, Esq.

- 4. PWSA will continue to expand its outreach efforts with community partners and will continue to solicit the input and suggestions of the LIAAC members as to how to most effectively pursue this outreach.
- 5. PWSA will waive its Hardship Grant Program's sincere effort of payment requirements for one year from the date of the final order in this case, or until January 14, 2022, whichever is later.

E. COVID-19 Related Costs And Relief Funding

- 1. In recognition of the extraordinary, not reasonably foreseeable, and nonrecurring circumstances posed by the COVID-19 Pandemic on PWSA's operations, PWSA shall be permitted to track and record as a regulatory asset all COVID-19 Pandemic Costs. PWSA shall be permitted to claim COVID-19 Pandemic Costs for ratemaking purposes in PWSA's next general rate proceeding to be determined in that proceeding. COVID Pandemic Costs that cause PWSA's operating costs for the specific NARUC account to exceed budgeted FTY and FPFTY levels shall be eligible for recovery for ratemaking purposes. PWSA shall track any operating costs that are reduced as a result of pandemic operating limitations and use those amounts to offset areas of increased cost in the regulatory asset account. Costs not specifically identifiable as COVID-19 Pandemic Related Costs shall not be eligible for recovery for ratemaking purposes. COVID-19 Pandemic Related Costs are defined as reasonably and prudently incurred incremental labor-related costs; costs incurred to maintain employee and contractor availability; incremental health care related costs; incremental worker's compensation costs; incremental occupational safety equipment, contractor, personnel costs, and annual uncollectible accounts expense.
- 2. PWSA shall maintain records, documents, and other information necessary to demonstrate that these costs qualify as COVID-19 Pandemic Costs. All parties reserve the right to review the prudency and reasonableness of these costs in the next base rate proceeding, or in any other proceeding in which PWSA may attempt cost recovery.
- 3. PWSA shall exercise prudent efforts to maximize its utilization of and track any government benefits, whether direct grant or other, to minimize costs to be deferred under this paragraph. PWSA shall provide a report detailing its efforts, any amounts obtained as part of these efforts and their intended use, and, if denied, the reason for such denial as part of its next base rate case.