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 28, 2021

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

Re:

Pittsburgh Water and Sewer Authority Docket Nos. M-2018-2640802 et al. OCA Letter in Support of PWSA's Motion to Hold in Abeyance the Stage 2 Stormwater Compliance Plan

Dear Secretary Chiavetta:

On April 9, 2021, Pittsburgh Water and Sewer Authority (PWSA or Authority) filed a Motion to Hold in Abeyance its Stage 2 Compliance Plan regarding PWSA's stormwater operations and tariff (Stormwater Compliance Plan), also filed on April 9, 2021. Through its Motion, PWSA asked the Commission to hold the proceeding to address the Stormwater Compliance Plan in abeyance pending resolution of PWSA's base rate case filed on April 13, 2021.

The purpose of this letter is to state the Office of Consumer Advocate's support for PWSA's request. The OCA believes that delaying the Stormwater Compliance Plan proceeding is in the best interest of all parties in that it will avoid overlapping and potentially duplicative litigation in the pending base rate proceeding, which includes the Authority's request for approval of a stormwater tariff and stormwater fee. The OCA agrees with PWSA's assertion that it would be most efficient to address stormwater in the rate case and, after entry of the Commission's Order in that proceeding, reopen the Stormwater Compliance Plan proceeding to address any remaining stormwater issues.

OCA Letter in Support 04-28-2021 Page 2 of 2

Again, the OCA states its support of PWSA's Motion to Hold in Abeyance its Stage 2 Compliance Plan regarding its Stormwater Compliance Plan. Thank you for your consideration in this matter.

Respectfully submitted,

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

Enclosure

cc: Certificate of Service

CERTIFICATE OF SERVICE

Re: Implementation of Chapter 32 of the Public Docket Nos. M-2018-2640802 M-2018-2640803

Utility Code Regarding Pittsburgh Water

and Sewer Authority - Stage 2

Petition of The Pittsburgh Water and Sewer

Authority for Approval of Its Long-Term Docket Nos. P-2018-3005037 Infrastructure Improvement Plan P-2018-3005039

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Letter Supporting PWSA's Motion Re: Stormwater Compliance Plan Abeyance, 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 28th day of April 2021.

SERVICE BY E-MAIL ONLY

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/s/ Erin L. Gannon Erin L. Gannon

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Michelle Naccarati Chapkis Mayor's Blue Ribbon Panel on

Restructuring the PWSA Care of Women for

a Healthy Environment 5877 Commerce Street Pittsburgh, PA 15206

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Fax: (717) 783-7152 Dated: April 28, 2021

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