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October 18, 2021

Via Email

Hon. Eranda Vero
Hon. Gail M. Chiodo
Administrative Law Judges
PA Public Utility Commission
Suite 4063
801 Market St.
Philadelphia, PA 19107

Re: Implementation of Chapter 32 of the Public Utility Code Regarding Pittsburgh Water and Sewer Authority – Stage 2 (Chapters 14 and 56), Docket Nos. M-2018-2640802 and M-2018-2640803

Dear Judges Vero and Chiodo:

On October 15, 2021, on behalf of the Pittsburgh Water and Sewer Authority's ("PWSA"), the Direct Testimony of Julie A Quigley St. No. 1 in the above-referenced matter was served. Subsequently, an error on page 38, line 18 was discovered. The response to the question is no, not "yes." Enclosed please find a copy of the page in red-line as well as a complete pdf version of the testimony. No exhibits are impacted and they are not being re-served. Copies to be served in accordance with the attached Certificate of Service.

Please note that this testimony is being served **via email only**. Please feel free to contact me if you would like to receive a hard copy as well.

Sincerely,



Deanne M. O'Dell, Esq.

DMO/lww

Enclosure

cc: Cert. of Service w/enc.
Patricia McNeal (via email only pmcneal@pa.gov)
Rosemary Chiavetta, Secretary (COS only)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PWSA's Direct Testimony Corrected page 38 upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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Dated: October 18, 2021

d. theft of service, which may include taking service without having made a proper application for service under Part III, Section A;

Q. PLEASE DESCRIBE THE SPECIFIC SCENARIO IDENTIFIED IN DIRECTED QUESTION NUMBER 14.

A. The Directed Question refers to PWSA Tariff Part III.e.8 regarding abatement of minimum consumption charges and asks whether a vacant premise where the customer submitted a Vacancy Affidavit and services were shut off at the curb would become a user without a contract situation if water usage is detected and/or wastewater flows from the property into the collection main.

Q. WOULD PWSA CONSIDER THIS A “USER WITHOUT CONTRACT” AS DEFINED BY SECTION 56.2 OF THE REGULATIONS?

A. No~~Yes~~. If the customer does not request to restore water service at the curb, this is theft of services pursuant to PWSA’s processes.

f. 52 Pa. Code § 56.91(a) New Property Owner (Without PWSA Knowledge) Processes

Q. PLEASE SUMMARIZE DIRECTED QUESTION NUMBER 15.

A. The Directed Question references PWSA’s Tariff Part III, Section A related to applications for service and requests that the parties discuss the procedures PWSA follows when it becomes aware a property is under new ownership but the new owner failed to apply for service from PWSA. BCS Staff specifically requests a discussion of whether this situation falls within the Commission’s definition of “user without contract” per Section 56.2, and, therefore, requires the termination notice processes of Sections 56.93-56.97, as permitted by Section 56.91(a).