


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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November 4, 2021

**Via Electronic Mail Only**

Daniel Clearfield, Esquire  
Deanne M. O'Dell, Esquire  
Karen O. Moury, Esquire  
Lauren M. Burge, Esquire  
Eckert, Seamans, Cherin, & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101

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

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set I, in the above-referenced proceedings.

In accordance with the Commission's Rules of Practice and Procedure, as modified during the September 9, 2021 Prehearing Conference, we request that PWSA provide verified answers to these inquiries within ten (10) days of service on a best-efforts basis, but no later than 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 consultant, as listed below:

Barbara R. Alexander  
Barbara Alexander Consulting, LLC  
83 Wedgewood Drive  
Winthrop, Maine 04364  
E-Mail: [barbalexand@gmail.com](mailto:barbalexand@gmail.com)

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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/ Lauren E. Guerra  
Lauren E. Guerra  
Assistant Consumer Advocate  
PA Attorney I.D. # 323192  
E-Mail: [LGuerra@paoca.org](mailto:LGuerra@paoca.org)

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service only)  
Certificate of Service

\*319533

## CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Pittsburgh Water and Sewer Authority (PWSA), Set I, 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 4<sup>th</sup> day of November 2021.

### **SERVICE BY E-MAIL ONLY**

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/s/ Lauren E. Guerra

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Dated: November 4, 2021  
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