



Eckert Seamans Cherin & Mellott, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101

TEL 717 237 6000
FAX 717 237 6019
www.eckertseamans.com

Deanne M. O'Dell
717.255.3744
dodell@eckertseamans.com

March 14, 2022

Via Electronic Filing

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

Re: Implementation of Chapter 32 of the Public Utility Code RE: Pittsburgh Water
and Sewer Authority; Docket Nos. M-2018-2640802 and M-2018-2640803

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Pittsburgh Water and Sewer Authority's Petition to Reopen the Record and Admit Late-Files Exhibits JAQ-39 and JAQ-40 with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

A handwritten signature in blue ink that reads "Deanne M. O'Dell".

Deanne M. O'Dell

Enclosure

cc: Hon. Eranda Vero w/enc. (via email only)
Hon. Gail M. Chiodo w/enc. (via email only)
Certificate of Service (via email only)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PWSA's Petition to Reopen the Record and Admit Late-Filed Exhibits JAQ-39 and JAQ-40 upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

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

Christine Maloni Hoover, Esq.
Erin L. Gannon, Esq.
Lauren E. Guerra, Esq.
Lauren Myers
Office of Consumer Advocate
555 Walnut St., 5th Fl., Forum Place
Harrisburg, PA 17101-1923
choover@paoca.org
egannon@paoca.org
lguerra@paoca.org
LMyers@paoca.org

Gina L. Miller, Esq.
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North St., 2nd Floor West
Harrisburg, PA 17120
ginmiller@pa.gov

John W. Sweet, Esq.
Elizabeth R. Marx, Esq.
Ria M. Pereira, Esq.
The Pennsylvania Utility Law Project
118 Locust St.
Harrisburg, PA 17101
pulp@pautilitylawproject.org

Barbara R. Alexander
83 Wedgewood Drive
Winthrop, ME 04364
barbalexand@gmail.com

Dated: April 21, 2022

Thomas J. Sniscak, Esq.
Kevin J. McKeon, Esq.
Whitney E. Snyder, Esq.
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
kjmckeon@hmslegal.com
wesnyder@hmslegal.com

John F. Doherty, Esq.
City of Pittsburgh Department of Law
City-County Building, Suite 313
414 Grant Street
Pittsburgh, PA 15219
John.doherty@pittsburghpa.gov

Krysia Kubiak, City Solicitor, The City of
Pittsburgh Department of Law
City-County Building, Suite 313
414 Grant Street
Pittsburgh, PA 15219
krysia.kubiak@pittsburghpa.gov

Harold J. Woods, Jr., P.E.
Howard J. Woods, Jr. & Associates, L.L.C.
49 Overhill Road
East Brunswick, NJ 08816-4211
howard@howardwoods.com

Brian Kalcic
Excel Consulting
225 S. Meramec Ave., Suite 720T
St. Louis, MO 63105
Excel.consulting@sbcglobal.net



Deanne M. O'Dell, Esq.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**PETITION TO REOPEN THE RECORD
AND
ADMIT LATE-FILED EXHIBITS JAQ-39 AND JAQ-40**

Pursuant to 52 Pa. Code § 5.571, the Pittsburgh Water and Sewer Authority (“PWSA”) respectfully requests that Administrative Law Judges Eranda Vero and Gail M. Chiodo (“ALJs”) reopen the record in the above-captioned action for the limited purpose of admitting into evidence that attached two exhibits on behalf of PWSA marked as Exhibits JAQ-39 and JAQ-40. A Verified Statement of Julie A. Quigley, Director of Customer Services of PWSA in support of the exhibits is attached. As part of the Joint Petition for Settlement filed on March 14, 2022 (“Joint Petition for Settlement”), the parties¹ in this proceeding requested that the ALJs enter into the record the pre-served testimony and exhibits described in Exhibit A attached to the Joint Petition for Settlement. At the request of the ALJs, a Telephonic Settlement Conference was held on April 5, 2022. In consideration of the on-the-record discussion that occurred during the Settlement Conference, PWSA has determined that the proposed two late-filed exhibits would assist the ALJs and, ultimately, the Commission in its consideration of the Joint Petition for Settlement and respectfully asks that they be admitted as part of the record in this proceeding.

¹ The parties in this proceeding include the Bureau of Investigation and Enforcement, (“I&E”), the Office of Consumer Advocate (“OCA”), Office of Small Business Advocate (“OSBA”), and the City of Pittsburgh (“City”), Pittsburgh United. While not a signatory of the Joint Petition for Settlement, OSBA did not oppose it.

In support of this Petition, PWSA represents as follows:

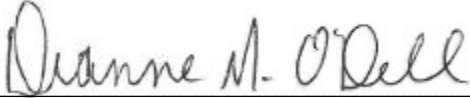
1. PWSA incorporates Section II of the Joint Petition herein to provide a more detailed procedural background of this proceeding prior to the filing of the Joint Petition for Settlement.
2. On March 31, 2022, the ALJs sent an email to the parties listing their concerns regarding the Joint Petition for Settlement and notified the parties that a Telephone Settlement Conference would be held on April 5, 2022. Tr. at 144.
3. The Telephonic Settlement Conference convened as scheduled on April 5, 2022 with all parties present. PWSA witness Julie A. Quigley, Director of Customer Service, was duly sworn and presented testimony in further support of the Joint Petition for Settlement based on the questions and discussion that occurred during the conference. Tr. at 147.
4. During the Telephonic Settlement Conference, the ALJs questioned the information provided on the PWSA bill to tenants including the tenant's eligibility or participation in PWSA's low-income customer assistance programs ("CAP"). Tr. at 171
5. Upon further consideration of the discussion and review of the record, PWSA has determined that including a sample of PWSA bills to a Tenant participating in CAP would provide additional clarity about the type and level of information that would be provided to the property owner if the property owner were to continue to receive a copy of the tenant bill.
6. Included with this Petition is a Verified Statement of Julie A. Quigley in support of the proposed exhibits. As explained in the Verified Statement, the two sample tenant bills convey information about participation in PWSA's CAP via credits to the charges as well

as identifying the Meter Type as “Residential Discount Program.” Verified Statement at ¶¶ 5 and 6. As also explained in the Verified Statement, the provided samples are bills of current customers. Since they are being submitted for the public record in this proceeding, the customers’ names, service addresses and account numbers have been redacted from the proposed exhibits. However, this information is provided to the property owner receiving a copy of the bill and is information that is already known by the property owner given the lease arrangement with the tenant. Verified Statement at ¶ 7.

7. Approval of this Petition is warranted based on the clarifications requested by the ALJs during the Telephonic Settlement Conference which was held after the filing of the Joint Petition for Settlement. More specifically, tenant bills for CAP participants were not previously entered into the record. Admitting the bills into the record now, provides the specific information that is included on a Tenant’s PWSA bill provided to the property owner pursuant to PWSA’s current processes and those proposed to be continued as explained in the Joint Petition for Settlement unless and until the opt-out process as set forth in Section III.B.1.b of the Joint Petition for Settlement is implemented. As the ALJs and, ultimately, the Commission evaluate the Joint Petition for Settlement, having in the record the specific information that is displayed on the bill of the tenant participating in CAP will enable a more informed decision regarding the proposed Joint Petition for Settlement.

WHEREFORE, for all the foregoing reasons, PWSA respectfully request that Your Honor grant this Petition and reopen the record in this proceeding to admit into evidence PWSA Exhibits JAQ-39 and JAQ-40.

Respectfully submitted,

A handwritten signature in dark ink, reading "Deanne M. O'Dell". The signature is written in a cursive, flowing style. The first name "Deanne" is written with a capital 'D' and a lowercase 'e'. The middle initial "M." is written with a capital 'M' and a period. The last name "O'Dell" is written with a capital 'O', an apostrophe, and a capital 'D' followed by "ell". The signature is positioned above a horizontal line.

Deanne M. O'Dell, Esq.
(PA Atty I.D. 80614)

Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
717.237.6000
717.237.6019 (fax)
dodell@eckertseamans.com

Counsel for Pittsburgh Water and Sewer Authority

Dated: April 21, 2022

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

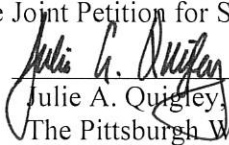
VERIFIED STATEMENT OF JULIE A. QUIGLEY

I, Julie A. Quigley, hereby state that the facts set forth below are true and correct to the best of my knowledge, information and belief, and I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities):

1. I am the Director of Customer Service for The Pittsburgh Water and Sewer Authority (“PWSA”) and am authorized to make this verified statement on its behalf.
2. On behalf of PWSA, I sponsored written Direct, Rebuttal, Surrebuttal and Rejoinder testimony as well as PWSA Exhibits JAQ-1 through JAQ-38 which were sought to be admitted into the record as part of the Joint Petition for Settlement filed on March 14, 2022 in this matter.
3. I participated as a witness on behalf of PWSA during the Telephonic Settlement Conference held on April 5, 2022.
4. I have reviewed and can verify the facts set forth in the Petition to Reopen the Record and Admit Late-Filed Exhibits JAQ-39 and JAQ-40.
5. PWSA Exhibit JAQ-39 is a sample residential tenant customer bill participating in PWSA’s low-income customer assistance program. This participating customer receives a 100% discount on the fixed monthly water and wastewater conveyance charges and, therefore, they do not appear as billed charges. The customer also receives an 85% discount off the stormwater charges which is reflected in the charges section of the bill. The Meter Type of “Residential Discount Program” also denotes that the customer participates in the Bill Discount Program.
6. PWSA Exhibit JAQ-40 is a sample residential tenant customer bill participating in PWSA’s Arrearage Forgiveness Program. In addition to not charging the fixed monthly water and wastewater conveyance charges and receiving 85% off the stormwater charges, this bill reflects that the total amount due is adjusted by \$30.00 as a result of the Forgiveness Program.
7. The customer’s name, service address and account number have been redacted from PWSA Exhibit JAQ-39 and JAQ-40 in recognition of the fact that these are actual bills that will be available on the public record at the Commission’s docket. This information, however, would not be redacted on the bill sent to the property owner and is information that is already known by the property owner given the lease arrangement with the tenant.
8. PWSA Exhibits JAQ-39 and JAQ-40 provide all the descriptive information related to participation in PWSA’s CAP program that is displayed on a customer’s bill. PWSA customers may also receive bill credits through the receipt of various grants including PWSA’s Hardship grant program.¹ Any grants received appear as credits with no additional description on the bill.
9. Pursuant to PWSA’s current processes and those proposed to be continued as explained in the Joint Petition for Settlement, PWSA would send a copy of these bills to the property owner unless and until the opt-out process as set forth in Section III.B.1.b of the Joint Petition for Settlement is implemented.

Dated:

4/21/22


Julie A. Quigley, Director of Customer Service
The Pittsburgh Water and Sewer Authority

¹ Receipt of grants from other assistance programs not part of PWSA’s CAP including the Clean Water Assistance Fund (“CWAF”) grant program offered by ALCOSAN and the current and temporary Low-Income Household Water Assistance Program (“LIHWAP”) administered by the Pennsylvania Department of Human Services are also displayed as credits.



Bill Date
03/10/2022

Account Number

Page 1 of 2

Billing Statement for

Billing Summary

Past Due

PRIOR BALANCE
\$692.98

-

PAYMENTS
\$300.00

=

PAST DUE
\$392.98

+

CURRENT CHARGES
\$80.92

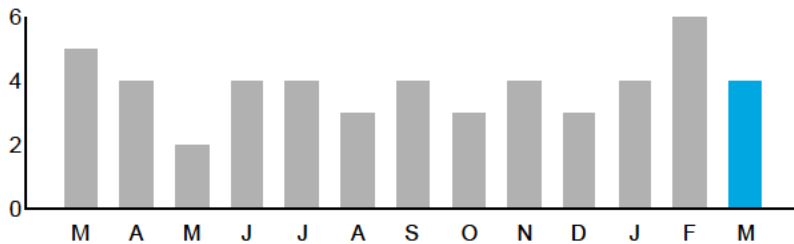
=

TOTAL BALANCE
\$473.90

This bill was issued to both the tenant and property owner.

My Water Usage

Average Monthly Usage in 1,000 Gallons



4,000

Total gallons used
this period

142

Average gallons used
per day

4,000 Gallons / 28 Days = 142 Average Daily Gallons

Customer Assistance Programs



Having difficulty paying your PWSA bill?

Call Dollar Energy Fund at
1-866-762-2348 to see if you qualify for:

1. Relief from your fixed, monthly PWSA charges plus forgiveness on past due balances if you are on an active payment plan
2. A cash grant to help pay your past due charges
3. Protection from shut-off in winter months
4. Reimbursement for private side lead line replacement



1200 Penn Avenue, Pittsburgh, PA 15222

MAKE CHECK OR MONEY ORDER
PAYABLE TO: PWSA

Account Number

PAST DUE AMOUNT
\$392.98

DUE DATE
03/30/2022

CURRENT CHARGES
\$80.92

TOTAL BALANCE
\$473.90

10% annual late payment
applies only to unpaid current
charges.

5069022100077203302022100000473901

My Billing Details

Previous Balance	\$692.98
Payment - 03/02/2022 - Thank You	-\$300.00
Current Charges	\$77.84
Interest	\$3.08
Total Due On or Before 03/30/2022	\$473.90

Current Charges	\$77.84
PWSA	
3,000 gallons @ \$6.55 per 1,000 gallons	\$19.65
3,000 gallons @ \$3.50 per 1,000 gallons	\$10.50
Stormwater Fee 85% Bill Discount Program	\$0.45
Distribution System Improvement Charge	\$1.51

Allegheny County Sanitary Authority	
Charges billed on behalf of ALCOSAN	
Sewage Treatment	\$45.73

My Meter Readings

Meter #:	Type: Residential Discount Program
Current:	98,000 03/07/2022 Actual
Previous:	94,000 02/07/2022 Actual
Usage:	4,000
Days of Service:	28



Did you know that you can pay your PWSA bill for free? Enroll in paperless billing, sign up for Zipcheck, or mail your bill coupon with payment to:

The Pittsburgh Water and Sewer Authority
1200 Penn Avenue, Pittsburgh, PA 15222

Pay-By-Phone

1-833-660-1366 - 24 hours a day / 7 days a week

Customer Service

412-255-2423 (Press Option #5) or info@pgh2o.com
Monday through Friday from 8 AM to 6 PM

24/7 Water/Sewer Emergency

412-255-2423 (Press Option #1)

Customer Assistance Programs

If you are having difficulty paying your PWSA bill, call Dollar Energy Fund at 1-866-762-2348 to see if you qualify for our assistance programs. pgh2o.com/CAP

Credits and Incentives

PWSA offers a stormwater credit and incentive program to encourage all customers to install stormwater solutions on their property. Doing so could reduce your bill while helping to control stormwater. pgh2o.com/stormwater-fee

Please register any questions or complaints about your bill prior to the due date. Visit pgh2o.com for more information or to view a current rate brochure.

PWSA bills on behalf of ALCOSAN for sewage treatment. ALCOSAN's rates are separate from PWSA. Their rates are set annually and the amount that they charge for sewage treatment is reflected in your bill from PWSA. If you have any questions regarding your ALCOSAN charges, please contact ALCOSAN at 412-766-6696.

Per Section A.1.a of PWSA's Supplemental Service Conditions, "...unpaid water, wastewater and/or stormwater charges are a lien against the property."

PAY YOUR PITTSBURGH WATER AND SEWER AUTHORITY BILL WITH CASH AT PARTICIPATING STORES.

Bring this barcode with you to make a payment.

Payments are recognized immediately and are posted on the next business day.

Retailer Instructions

1. **SCAN** the customer's barcode.
2. The register will **PROMPT** you to enter an amount.
3. **ENTER** the amount the customer wants to pay.
4. **COLLECT** the desired cash amount (and fee, if applicable).
5. When the transaction is **COMPLETE** hand customer the receipt.



799366438020006371683196090188

By accepting or using this barcode to make a payment, you agree to the full terms and conditions, available at vanilladirect.com/pay/terms. After successful payment using this barcode, you may retrieve your full detailed e-receipt at vanilladirect.com/pay/e-receipt.

For PWSA Customer Service, please call 412-255-2423 and press option 5.

powered by
KUBRAEZ-PAY.

A \$1.49 processing fee will be added.



DOLLAR GENERAL

Walgreens



Other convenient ways to pay:



Make one time payments via pgh2o.com.

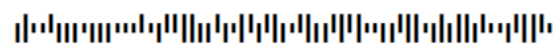


Enroll in eBilling to go green, make fee free payments, and view bills and inserts via pgh2o.com.



Make payment via telephone at 412-255-2423 and press option 2.

PLEASE MAIL TO BELOW ADDRESS.



THE PITTSBURGH WATER AND SEWER AUTHORITY
PO BOX 747055
PITTSBURGH, PA 15274-7055



Billing Statement for

Service Location: [REDACTED]

Billing Summary

Summary of Charges Due:

Current Charges:	\$171.56
Installment Plan Charges:	\$27.52
Due on 05/09/2022:	\$199.08

Past Due

PRIOR BALANCE
\$942.37

-

PAYMENTS
\$229.08

=

PAST DUE
\$713.29

+

Due on 05/09/2022
\$199.08

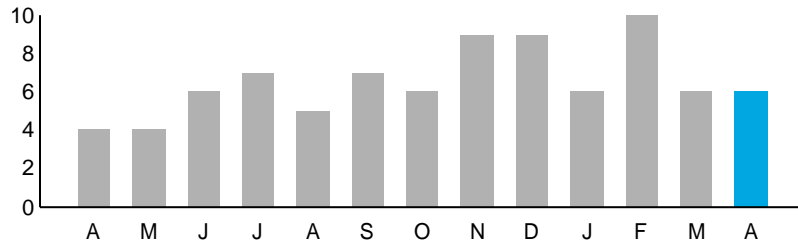
=

TOTAL BALANCE
\$884.85

This bill was issued to both the tenant and property owner.

My Water Usage

Average Monthly Usage in 1,000 Gallons

6,000
Total gallons used
this period193
Average gallons used
per day

6,000 Gallons / 31 Days = 193 Average Daily Gallons

Customer Assistance Programs



Having difficulty paying your PWSA bill?

**Call Dollar Energy Fund at
1-866-762-2348 to see if you qualify for:**

1. Relief from your fixed, monthly PWSA charges plus forgiveness on past due balances if you are on an active payment plan
2. A cash grant to help pay your past due charges
3. Protection from shut-off in winter months
4. Reimbursement for private side lead line replacement



1200 Penn Avenue, Pittsburgh, PA 15222

MAKE CHECK OR MONEY ORDER
PAYABLE TO: PWSAAccount Number
[REDACTED]PAST DUE AMOUNT
\$713.29DUE DATE
05/09/2022CURRENT CHARGES
\$199.08TOTAL BALANCE
\$884.85A 10% annual late payment
charge applies to all
unpaid bills.

5033073124933305092022100000884857

My Billing Details

Previous Balance	\$942.37
Payment - 03/31/2022 - Thank You	-\$199.08
Current Charges	\$171.56
Adjustments	
Forgiveness Program	-\$30.00
Total Due On or Before 05/09/2022	\$884.85

Current Charges	\$171.56
PWSA	
5,000 gallons @ \$13.10 per 1,000 gallons	\$65.50
5,000 gallons @ \$6.99 per 1,000 gallons	\$34.95
Stormwater Fee 85% Bill Discount Program	\$0.89
Distribution System Improvement Charge	\$5.03

Allegheny County Sanitary Authority	
Charges billed on behalf of ALCOSAN	
Sewage Treatment	\$65.19

My Meter Readings

Meter #:	Type: Residential Discount Program
Current:	147,000 04/13/2022 Actual
Previous:	141,000 03/13/2022 Actual
Usage:	6,000
Days of Service:	31



Did you know that you can pay your PWSA bill for free? Enroll in paperless billing, sign up for Zipcheck, or mail your bill coupon with payment to:

The Pittsburgh Water and Sewer Authority
1200 Penn Avenue, Pittsburgh, PA 15222

Pay-By-Phone

1-833-660-1366 - 24 hours a day / 7 days a week

Customer Service

412-255-2423 (Press Option #5) or info@pgh2o.com
Monday through Friday from 8 AM to 6 PM

24/7 Water/Sewer Emergency

412-255-2423 (Press Option #1)

Customer Assistance Programs

If you are having difficulty paying your PWSA bill, call Dollar Energy Fund at 1-866-762-2348 to see if you qualify for our assistance programs. pgh2o.com/CAP

Credits and Incentives

PWSA offers a stormwater credit and incentive program to encourage all customers to install stormwater solutions on their property. Doing so could reduce your bill while helping to control stormwater. pgh2o.com/stormwater-fee

Please register any questions or complaints about your bill prior to the due date. Visit pgh2o.com for more information or to view a current rate brochure.

PWSA bills on behalf of ALCOSAN for sewage treatment. ALCOSAN's rates are separate from PWSA. Their rates are set annually and the amount that they charge for sewage treatment is reflected in your bill from PWSA. If you have any questions regarding your ALCOSAN charges, please contact ALCOSAN at 412-766-6696.

Per Section A.1.a of PWSA's Supplemental Service Conditions, "...unpaid water, wastewater and/or stormwater charges are a lien against the property."

PAY YOUR PITTSBURGH WATER AND SEWER AUTHORITY BILL WITH CASH AT PARTICIPATING STORES.

Bring this barcode with you to make a payment.

Payments are recognized immediately and are posted on the next business day.

Retailer Instructions:

1. **SCAN** the customer's barcode.
2. The register will **PROMPT** you to enter an amount.
3. **ENTER** the amount the customer wants to pay.
4. **COLLECT** the desired cash amount (and fee, if applicable).
5. When the transaction is **COMPLETE** hand customer the receipt.



799366438020006371682794312523

By accepting or using this barcode to make a payment, you agree to the full terms and conditions, available at vanilladirect.com/pay/terms. After successful payment using this barcode, you may retrieve your full detailed e-receipt at vanilladirect.com/pay/ereceipt.

For PWSA Customer Service, please call 412-255-2423 and press option 5.

powered by
KUBRAEZ-PAY

A \$1.49 processing fee will be added.



DOLLAR GENERAL

Walgreens



Other convenient ways to pay:



Make one time payments via pgh2o.com.



Enroll in eBilling to go green, make fee free payments, and view bills and inserts via pgh2o.com.



Make payment via telephone at 412-255-2423 and press option 2.

PLEASE MAIL TO BELOW ADDRESS.



THE PITTSBURGH WATER AND SEWER AUTHORITY
PO BOX 747055
PITTSBURGH, PA 15274-7055