

Eckert Seamans Cherin & Mellott, LLC 213 Market Street 8<sup>th</sup> Floor Harrisburg, PA 17101 TEL: 717 237 6000 FAX: 717 237 6019

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

May 31, 2023

### Via Electronic Filing

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

### RE: <u>The Pittsburgh Water and Sewer Authority – Water – R-2023-3039920</u>

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Pittsburgh Water and Sewer Authority's ("PWSA") Responses to the Bureau of Technical Utility Services ("TUS") with regard to the abovereferenced matter. 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: Cert. of Service w/enc. pzander@pa.gov

#### **CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of PWSA's Response to TUS Data Requests 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. Office of Small Business Advocate Forum Place Building 555 Walnut Street, 1st Floor Harrisburg, PA 17101 <u>swebb@pa.gov</u>

Christine Appleby, Esq. Chris Andreoli, Esq. Andrew Zerby, Esq. Keith Earls, Esq. Gina Miller, Esq. Office of Consumer Advocate 555 Walnut St., 5<sup>th</sup> Fl., Forum Place Harrisburg, PA 17101-1923 <u>OCAPWSA2023BRC@paoca.org</u>

Scott B. Granger, Esq. Michael A. Podskoch, Jr., Esq. Allison C. Kaster, Esq. Bureau of Investigation & Enforcement Commonwealth Keystone Building 400 North St., 2<sup>nd</sup> Floor West Harrisburg, PA 17120 <u>sgranger@pa.gov</u> <u>mpodskoch@pa.gov</u> <u>akaster@pa.gov</u>

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 <u>barbalexand@gmail.com</u>

Dated: May 31, 2023

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. Krysia Kubiak, City Solicitor, The City of Michael E. Kennedy, Associate City Solicitor Pittsburgh Department of Law City-County Building, Suite 313 414 Grant Street Pittsburgh, PA 15219 John.doherty@pittsburghpa.gov krysia.kubiak@pittsburghpa.gov Michael.kennedy@pittsburghpa.gov

Jared Thompson, Esq. Peter DeMarco, Esq. Natural Resources Defense Council 1152 15th St., NW, Suite 300 Washington, DC 20005 Jared.thompson@nrdc.org jardthompson@nrdc.org pdemarco@nrdc.org

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

Deanne M. O'Dell

Deanne M. O'Dell, Esq.

# List of Attachments

#	Attachment	Responsive Document	
11	Attach A	PWSA Invoice West View Water Authority Hydrants 4.28.23	
11	Attach B	PWSA Invoice Wilkinsburg-Penn Joint Water Authority Hydrants 3.3.23	

Request: TUS-R-1	information 53.52(c)(c) operating the balance December	PWSA's response for 52 Pa. Code § $53.52(c)(6)$ does not provide required information. Please provide a revised response for 52 Pa. Code § 53.52(c)(6) that includes a brief description of any major changes in the operating or financial condition of PWSA occurring between the date of the balance sheet provided in response to 52 Pa. Code § $53.52(c)(6)$ (i.e., December 31, 2021) and the date of transmittal of the tariff supplement (i.e., May 9, 2023).	
Response:	There has not been any major change in the operating or financial condition of the utility since the balance sheet dated December 31, 2022.		
<b>Response Provided</b>	by:	Kevin Pawlos, Deputy Director, Finance Pittsburgh Water and Sewer Authority	
Dated:		5/31/23	

Request: TUS-R-2	<ul> <li>WSA's response for 52 Pa. Code § 53.53, Exhibit D, Filing Requirement .2 did not identify any revenues for "Penalties &amp; Interest" for the historic st year ended 12/31/2022 (HTY), or for subsequent years (i.e., 2023, 024, 2025, and 2026). However, PWSA's response for 52 Pa. Code § 8.53, Exhibit D, Filing Requirement II.6 identified \$1,526,321 in venues for "Penalties &amp; Interest" for the HTY and described these venues as including interest on unpaid bills (e.g., late fees, etc.). Please rovide responses for each of the following:</li> <li>Reconfirm anticipated revenues for "Penalties &amp; Interest" for 2023, 2024, 2025, and 2026, by utility type (i.e., water, wastewater, and stormwater).</li> </ul>	
	<ul> <li>b. Specify whether PWSA will waive all charges that result in "Penalties &amp; Interest" revenues until PWSA completes a rate case with the Commission that includes an adjustment to reflect normalized "Penalties &amp; Interest" revenues.</li> </ul>	
Response:	a. Revenue for Penalties is not currently included in the anticipated revenues for the forecast period due to the uncertainty of the revenue source and the potential shortfall of necessary revenue needed to fund the anticipated revenue requirements. Additionally, PWSA staff continually work to reduce penalties for customers through such efforts as payment plans for customers with overdue bills.	
	b. PWSA will not waive any penalties and interest revenues until the completion of the rate case.	
<b>Response Provided</b>	by: Kevin Pawlos, Deputy Director, Finance Pittsburgh Water and Sewer Authority	
Dated:	5/31/23	

- **Request: TUS-R-3** PWSA's effective water tariff, Pages 6 and 7 does not include Ross and McKees Rocks Townships or Fox Chapel and Sharpsburg Boroughs in the list of territories served by PWSA. However, PWSA's public online lead water service line map identifies water service line material types for approximately 15 to 20 properties located in Ross Township, including properties located on Cliffview Road and Scherling Street. Also, in PWSA's LTIIP Petition at Docket P-2022-3035956, Appendix A, Figure 1-1, PWSA identified water mains in Ross and McKees Rocks Townships, and in Fox Chapel and Sharpsburg Boroughs. Please explain this apparent discrepancy and reconfirm whether PWSA's effective water tariff includes a complete description of the territory served by PWSA:
- **Response:** PWSA provides service to customers in the following service territories which were inadvertently excluded in PWSA's Initial Tariff effective March 1, 2019. The customers and/or mains within the referenced service territories existed prior to the Commission's assumption of jurisdiction over PWSA. As part of the Compliance Tariff filed with this case, PWSA will update the list of service territories in its tariff.

Municipality
Penn Hills
Ross Township
Shaler Township
Swissvale Borough
Wilkinsburg Borough

<b>Response Provided by:</b>	Julie A. Mechling, Director of Customer Service The Pittsburgh Water and Sewer Authority
Dated:	5/31/23

Request: TUS-R-4	In PWSA's LTIIP Petition at Docket P-2022-3035956, Page 12, PWSA indicated that it serves approximately 7,539 fire hydrants, not including private hydrants. However, PWSA's response for 52 Pa. Code § 53.53, Exhibit D, Filing Requirement II.4 only identified 7,508 public fire hydrants. Please explain this apparent discrepancy and reconfirm the number of public fire hydrants served by PWSA:	
Response:	The number of hydrants listed in the LTIIP and FR II.4 are estimates at that time. PWSA is continually replacing fire hydrants across our system. This number can fluctuate slightly due to this ongoing work. The current number of public fire hydrants served by PWSA is 7,551 (see response to TUS-R-6). As the proceeding moves forward, PWSA will utilize the most current number in its rate calculations.	
<b>Response Provided</b>	by:	Kevin Pawlos, Deputy Director, Finance Pittsburgh Water and Sewer Authority
Dated:		5/31/23

Request: TUS-R-5	Please explain whether PWSA charges private fire protection customers for service provided to private fire hydrants and confirm that PWSA does not provide free service for any private fire hydrants.	
Response:	Based on PWSA's research to date, private fire hydrants are often associated with Homeowners Associations, Housing Authority development, universities and other privately owned entities which are served by PWSA via a 6" or greater meter and assessed accordingly pursuant to PWSA's Private Fire Protection Rate, PWSA Tariff Water – Pa. P.U.C. No. 1, Section B.1.1 at Fourth Revised Page No. 10.	
<b>Response Provided</b>	by:	Kevin Pawlos, Deputy Director, Finance Pittsburgh Water and Sewer Authority
Dated:		5/31/23

Request: TUS-R-6 PWSA's response for 52 Pa. Code § 53.53, Exhibit D, Filing Requirement II.10 indicated that the City of Pittsburgh represents all of PWSA's public fire protection customers. However, PWSA also provides water service in Millvale Borough and in portions of other municipalities, which may include service for public fire hydrants in each municipality. Please provide responses for each of the following:

a. Quantify the number of public fire hydrants served by PWSA, by municipality.

b. Specify PWSA's existing rates for public fire hydrants, by municipality. c. Specify PWSA's proposed rates and revenues for public fire hydrants, by municipality and by year (i.e., 2023, 2024, 2025, and 2026).

#### **Response:**

a)

Municipality	No. of Hydrants
City of Pittsburgh	7,413
Millvale	107
Etna	3
Sharpsburg	4
Aspinwall	8
Fox Chapel	1
O'Hara	5
Shaler	3
Ross*	3
Reserve*	1
Penn Hills*	1
Wilkinsburg*	2
Total	7,551

\*Hydrants are just outside City of Pittsburgh boundary, but mapped locations of the hydrant and accuracy of the municipal boundary make them questionable as to whether they qualify

b) PWSA's monthly Public Fire Rate per hydrant is \$18.35 (assessed at 80% for the City of Pittsburgh per Co-op agreement).

c) PWSA's monthly Public Fire Rate per hydrant is \$21.80, \$25.94, and \$31.04 for 2024, 2025, and 2026, respectively. The rate and revenues included in the Cost of Service Model for the forecast period are listed below:

	FY 2024	FY 2025	FY 2026
Number of Hydrants	7,508	7,508	7,508
Number of Bills	90,096	90,096	90,096
Rate (per hydrant)	\$ 21.80	\$ 25.94	\$ 31.04
Anticipated Revenue	\$ 1,964,093	\$ 2,337,090	\$ 2,796,580

<b>Response Provided by:</b>	Kevin Pawlos, Deputy Director, Finance Pittsburgh Water and Sewer Authority
Dated:	5/31/23

**Request: TUS-R-7** PWSA's response for 52 Pa. Code § 53.53, Exhibit D, Filing Requirement V.16 indicated that PWSA has not projected balances for contributions in aid of construction (CIAC) and customer advances for construction (CAC). Please explain why PWSA is not including a normalized amount of CIAC and CAC in its projected revenues.

Response: PWSA has not projected balances for CIAC and CAC on the basis of its experience that neither funding from PWSA nor receipt of revenue from applicants would not have been required or received within the last five years if PWSA's current line extension tariff provisions had been applicable. PWSA's current tariff requirements were not in existence prior to PWSA coming within the Commission's jurisdiction in 2018. Rather, PWSA's line extension practices and procedures were consistent with those permitted by the Pennsylvania Municipality Authorities Act, 53 Pa.C.S. § 5601, et seq. ("MAA"). As directed by the Commission in its March 26, 2020 Stage 1 Order at Docket Nos. M-2018-2640802 (water) and M-2018-2640803 (wastewater), PWSA filed a Petition on March 26, 2021 with its proposed supplemental compliance plan to modify its line extension policies and Tariff provisions to be compliant with the Commission's line extension regulations to be approved as part of PWSA's upcoming base rate case at Docket Number R-2021-3024773. PWSA's revised line extension tariff provisions became effective January 12, 2022. As PWSA's experience has not demonstrated the need to specifically project balances for this issue or the receipt of customer funds for this purpose, they were not included in its projected revenues. PWSA is prepared to cover any potential costs in the future with cash reserves if needed.

<b>Response Provided by:</b>	Kevin Pawlos, Deputy Director, Finance
	Pittsburgh Water and Sewer Authority

**Dated:** 

5/31/23

provides t utility furn and contin for 52 Pa. "PWSA p devices, m PUC regu these reve evidence o		5.7(b) of the Commission's regulations, 52 Pa. Code § 65.7(b), that unless otherwise authorized by the Commission, a public nishing metered service shall provide, install at its own expense, nue to own, maintain and operate all meters. PWSA's response Code § 53.53, Exhibit D, Filing Requirement II.6 indicated, reviously charged associated costs with meters, remote reading neter replacement charges, and their installation. Based on PA lation, PWSA may not be able to collect these charges, however, enues have been included in the FPFTY." Please provide of PWSA's current authorization by the Commission to charge s for meters and meter installation.	
Response:	Under certain circumstances, PWSA is authorized by the Commission to charge customers for meters including, for example, damages to meters, missing meters for property set up for individual meters, and requests to upsize domestic water meters. See PWSA Tariff Water, Section D.6, D.9 and D.10 First Revised Page No. 43.		
<b>Response Provided</b>	by:	Julie A. Mechling, Director of Customer Service The Pittsburgh Water and Sewer Authority	
Dated:		5/31/23	

**Request: TUS-R-9** PWSA St. No. 5, Appendix A, Exhibit TI-1 identified two stormwater connections to other municipalities. Please provide evidence that PWSA filed with the Commission a copy of the written contract or verbal or written agreement for these connections pursuant to Section 507 of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 507, including terms for services and costs associated with these connections.

Response: PWSA does not have any contracts or other agreements in place with other municipalities regarding stormwater service at this time as identified on PWSA St. No. 5, Appendix A, Exhibit Tl-1, and accordingly does not have any certificates of filing with the Commission. Any such agreements that PWSA may enter into in the future would be submitted to the Commission pursuant to 66 Pa. C.S. § 507. (See PWSA's Second Revised Stage 2 Stormwater Compliance Plan, Docket Nos. M-2018-2640802 and M-2018-2640803 (dated Oct. 24, 2022), Appendix 1 at 24-25; Appendix 2 at 13-15 ("Stormwater Compliance Plan") (approved by Secretarial Letter issued Jan. 20, 2023)).

As explained in the Stormwater Compliance Plan, PWSA does not have these agreements in place, and believes it is premature to enter into such agreements at this time, for two major reasons. First, stormwater from these municipalities flows into a combined sewer system that the City of Pittsburgh developed decades ago, in some cases by enclosing creeks in which the stormwater originally discharged. Second, future control of combined sewer and separate sanitary sewer overflows may involve PWSA and upstream municipalities working together to provide parallel relief sewers to address wet weather issues. When such projects are developed, a cost sharing model that includes upstream communities will be developed, and PWSA will enter into agreements with these municipalities at that time. With this approach, PWSA and these municipalities will work together to provide adequate stormwater management to solve wet weather issues. (*Id.*, App. 1 at 25).

<b>Response Provided by:</b>	Tony Igwe, Senior Group Manager – Stormwater		
	The Pittsburgh Water and Sewer Authority		

**Dated:** 5/31/23

**Request: TUS-R-10** PWSA St. No. 7, Ex. HJS-5W identified claimed flow equivalency ratios and indicated that the ratios are industry standard and were obtained from the American Water Works Association (AWWA). Please provide a copy of the referenced AWWA source documentation and reconfirm whether PWSA's meter equivalency ratios conform with AWWA meter equivalencies based on water meter safe maximum operating capacities, including for ten-inch water meters.

**Response:** The source documents are copyrighted by AWWA and require purchase. The flow equivalency ratios for meter sizes up through 8-inch are derived from maximum-rated safe operating flow standards contained in AWWA's Manual M1, pg 338, Table VII.2-5. The 10-inch assumption is the water meter flow rate referenced from AWWA's Manual M6 for a compound meter.

To provide some additional information, the related flow rates to the meter equivalent ratios used in the model are provided below:

<u>Meter Size</u>	Maximum-Rated Flow (gpm)	<u>Meter Equivalent Ratio</u>
5/8"	20	1
3/4"	30	1.5
1"	50	2.5
1.5"	100	5
2"	160	8
3"	320	16
4"	500	25
6"	1000	50
8"	1600	80
10"	2300	115

**Response Provided by:** 

Harold J. Smith, Vice President, Raftelis Financial Consultants Consultant to The Pittsburgh Water and Sewer Authority

Dated:

5/31/23

**Request: TUS-R-11** PWSA St. No. 7, Ex. HJS-5W, Adjustment Code W-I identified an expense labelled as "Non.City Water Reimbursement", which is included in claimed customer service operating expenses. Please provide a description of this expense and provide related invoices.

**Response:** Expenses within this account are attributable to charges paid by PWSA to West View Water Authority and Wilkinsburg-Penn Joint Water Authority for PWSA owned hydrants that are supplied by West View Water Authority and Wilkinsburg-Penn Joint Water authority water lines. See TUS-R-11 Attach A and Attach B for the invoices.

<b>Response Provided by:</b>	Kevin Pawlos, Deputy Director of Finance Pittsburgh Water and Sewer Authority
Dated:	5/31/23

**Request:** TUS-R-12 Please explain why the expense labelled as "Non.City Water Reimbursement" is included with customer service costs and is considered a metering cost.

**Response:** This expense should not be considered in the determination of allocation factors W-I and WW-E. This will be corrected in the model submitted with rebuttal testimony.

<b>Response Provided by:</b>	Harold J. Smith, Vice President, Raftelis Financial Consultants		
	Consultant to The Pittsburgh Water and Sewer Authority		

Dated:

5/31/23

Request: TUS-R-13 Please confirm that PWSA's claimed expenses do not include any discount or reimbursement for City of Pittsburgh residents served by Pennsylvania-American Water Company similar to the discount that PWSA eliminated pursuant to Section III.T. of the Joint Petition for Settlement dated September 13, 2019, at Docket Nos. M-2018-2640802 and M-2018-2640803

**Response:** PWSA can confirm that this is true.

<b>Response Provided by:</b>	Kevin Pawlos, Deputy Director of Finance The Pittsburgh Water and Sewer Authority		
Dated:	5/31/23		

**Request: TUS-R-14** PWSA St. No. 7, Ex. HJS-5W, Adjustment Code W-J identified that this adjustment code uses 2022 water capital improvement plan (CIP) costs to allocate engineering and construction costs to the functional categories of treatment, storage, transmission and distribution, and admin. Also, PWSA's response for 52 Pa. Code § 53.53, Exhibit D, Filing Requirement XI.4 included a copy of PWSA's 2022 CIP, which appears to identify on Pages 7-8 that PWSA's 2022 CIP water distribution project costs also include costs for projects affecting the functional categories of supply, meters, services, and fire protection (i.e., fire hydrants). However, PWSA St. No. 7, Ex. HJS-2W reflects that Adjustment Code W-J does not allocate any costs to supply, distribution, meters, services or fire protection, and instead allocates such costs to other functional categories. Please explain this apparent discrepancy.

**Response:** As was the case in PWSA's last rate filing, Engineering & Construction costs are allocated only to treatment, storage and transmission because the vast majority of the costs reflected in this line item are for time spent managing large projects in these three categories.

<b>Response Provided by:</b>	Harold J. Smith, Vice President, Raftelis Financial Consultants Consultant to The Pittsburgh Water and Sewer Authority
Dated:	5/31/23

**Request: TUS-R-15** Please explain why PWSA St. No. 7, Exhs. HJS-8W and HJS-9W do not assign wholesale customers any units of service for meters and services, and for billing, collections, and meter reading.

**Response:** While the contracts with some of the wholesale customers do not allow for the assessment of a monthly fixed charge and no wholesale customer is assessed the standard retail minimum charges, the rate model should include units of service for those wholesale customers that can be assessed some form of a Minimum or Base Charge. The model submitted with rebuttal testimony will address this oversight.

<b>Response Provided by:</b>	Harold J. Smith, Vice President, Raftelis Financial Consultants Consultant to The Pittsburgh Water and Sewer Authority
Dated:	5/31/23

Request: TUS-R-16 Please explain why PWSA St. No. 7, Ex. HJS-9W does not assign public fire protection customers any units of service for billing.

**Response:** Public fire protection charges are assessed annually using a process that is separate from PWSA's standard billing process. PWSA currently presents the City with a list of annual costs for that fiscal year per the executed co-op. The costs for public fire hydrants are one of those costs included in the list.

<b>Response Provided by:</b>	Harold J. Smith, Vice President, Raftelis Financial Consultants Consultant to The Pittsburgh Water and Sewer Authority	
Dated:	5/31/23	

Dated:

Request: TUS-R-17 PWSA's proposed tariff supplement included an infrastructure improvement charge (IIC) and a customer assistance charge (CAC), which indicate that these charges "will apply uniformly to all classes of water customers (with the exception of fire protection customers)." However, PWSA St. No. 7, Ex. HJS-22W included private fire protection customers in these charges and did not include wholesale customers in these charges. Please provide responses for each of the following:

a. Reconfirm the applicability of PWSA's IIC and CAC and provide proposed revised tariff supplements or revised supporting calculations, as applicable.

b. Explain why it is reasonable to exempt fire protection customers from proposed surcharges.

c. Explain whether it is feasible to allocate public fire protection customers a portion of the total cost of service recovered through the IIC and CAC in a manner that conforms with Section 1328 of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 1328.

#### **Response:**

- a. The IIC is assessed to all metered volumetric usage except private fire. Public fire hydrants are not metered and therefore are also exempt from this charge. The CAC is assessed to all metered volumetric usage except private fire and CAP enrolled customers. Public fire hydrants are not metered and therefore are also exempt from this charge.
- b. While private fire flow is metered, general usage is discouraged and metered flow for a fire event is not charged. Therefore, it was considered reasonable to exempt private fire since including it in the calculation may jeopardize PWSA's revenue recovery.
- c. While it may be feasible through some other calculation, formula, or methodology than the recommended approach; however, the current approach recovers the maximum revenue allowable per Pennsylvania Public Utility Code, 66 Pa.C.S. § 1328.

<b>Response Provided by:</b>	Harold J. Smith, Vice President, Raftelis Financial Consultants
-	Consultant to The Pittsburgh Water and Sewer Authority

Dated:

5/31/23



DUE DATE 05-18-2023

ACCOUNT BALANCE \$955.69

AMOUNT PAID

## 

PWSA

FINANCE DEPT- 17 HYDRANTS 1200 PENN LIBERTY PLZ I PITTSBURGH, PA. 15222-4216 8130001000000000095569051820233

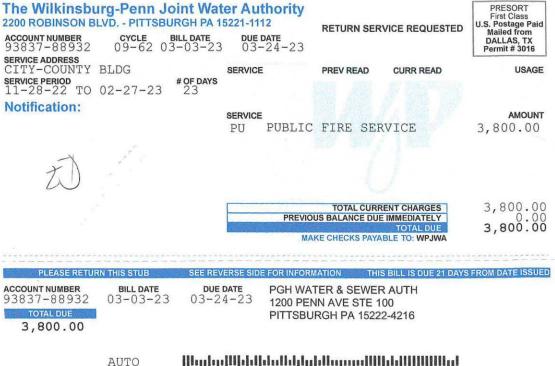
ACCOUNT NU	MBER	SERVICE USED AT:			DATE PREPARED	
81300-0100000-000		441 SMITHFIELD ST			04-28-2023	
SERVICE	PERIOD	METER READINGS		CONSUMPTION		
FROM	ТО		PRESENT PRIO	R		
03-31-2023 Amount of Late Fee	04-27-202 (A) Bala	3 .nce 3	Forward tection Charges- This Peri	455.0 45.5 500.6 od	51 removed	
	17	.0	Hydrants	455.0	09	
Present Ad	ccount Bala	ince	(A+B)	955.6	59	

AMOUNT AFTER	DUE DATE	AMOUNT BY	SEE REVERSE FOR
\$1,001.20	05-18-2023	\$955.69	CUSTOMER INFORMATION

West View Water Authority

For customer information visit www.westviewwater.org

TUS-R-11 Attach B



I, Tony Igwe, hereby state that I am the Senior Group Manager, Stormwater for The Pittsburgh Water and Sewer Authority. I hereby verify that the facts set forth in the attached discovery responses to TUS Set I which I am sponsoring are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

05/25/2023 | 12:51 PM EDT

Dated

DocuSigned by: Tony Igue 404A1979E8BC410

Tony Igwe Senior Group Manager, Stormwater The Pittsburgh Water and Sewer Authority

I, Kevin Pawlos, hereby state that I am Deputy Director of Finance for The Pittsburgh Water and Sewer Authority. I hereby verify that the facts set forth in the attached discovery responses to TUS Set I which I am sponsoring are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

05/24/2023 | 10:35 AM EDT

Dated

DocuSianed by: D7D6B69EBD8A4A8

Kevin Pawlos Deputy Director of Finance The Pittsburgh Water and Sewer Authority

I, Harold Smith, hereby state that I am a Vice President of Raftelis Financial Consultants, Inc. and have been retained by The Pittsburgh Water and Sewer Authority. I hereby verify that the facts set forth in the attached discovery responses to TUS Set I which I am sponsoring are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

05/24/2023 | 7:23 AM PDT

Dated

DocuSigned by: Harold J. Smith

Harold Smith, Vice President Raftelis Financial Consultants, Inc.

Consultant to: The Pittsburgh Water and Sewer Authority

I, Julie A. Mechling, hereby state that I am Director of Customer Service for The Pittsburgh Water and Sewer Authority. I hereby verify that the facts set forth in the attached discovery responses to TUS Set I which I am sponsoring are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

05/24/2023 | 10:24 AM EDT

Dated

DocuSigned by: Julie A. Mechling

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