

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

June 12, 2023

Via Electronic Filing

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

Re: Complaints of the Office of Consumer Advocate and the Office of Small Business Advocate regarding Pittsburgh Water and Sewer Authority Rate Filing; Docket Nos. R-2023-3039920 (water), R-2023-3039921 (wastewater); R-2023-3039919 (stormwater), C-2023-3040845 (OCA v. PWSA water); C-2023-3040846 (OCA v. PWSA wastewater); C-2023-3040847 (OCA v. PWSA stormwater); C-2023-3040785 (OSBA v. PWSA water); C-2023-3040780 (OSBA v. PWSA wastewater); and, C-2023-3040789 (OSBA v. PWSA stormwater)

Dear Secretary Chiavetta:

The purpose of this letter is to notify you that, pursuant to 52 Pa. Code § 5.61(d), this matter involves a rate proceeding and the **Pittsburgh Water and Sewer Authority (“PWSA”) is electing not to file a formal answer to the complaints filed by the Office of Small Business Advocate (“OSBA”) and the Office of Consumer Advocate (“OCA”), nor to any subsequently filed complaints.**

On May 9, 2023, PWSA filed support for a requested increase in base rates at the above referenced R-Dockets. Simultaneously, PWSA filed: (1) A Petition to Consolidate the three utility rate cases and to utilize combined water, stormwater, and wastewater revenues; and, (2) A Petition for Waiver of Statutory Definition of Fully Projected Future Test Year. Relatedly, on May 9, 2023, PWSA a filed: (1) A Petition For Authorization To Increase Water And Wastewater DSIC Charge Caps To 7.5% (which was docketed to P-2023-3040734 and P-2023-3040735); and, (2) A Petition for Authorization To Implement A Customer Assistance Charge (which was docketed to P-2023-3040578). Subsequently, on May 23, 2023, PWSA filed a Petition To Consolidate DSIC Increase Petition And Customer Assistance Charge Petition With Base Rate Case Filings For Water, Wastewater, And Stormwater.

Complaints filed by OSBA were served on May 22, 2023 and are docketed at the above referenced C-docket numbers. Complaints filed by the OCA were served on May 24, 2023 and are docketed at the above referenced C-docket numbers.

Pursuant to 52 Pa. Code § 5.61(d), PWSA has elected to not answer any of the complaints since they are complaints in a rate proceeding. Please contact me with any questions.

Sincerely,



Deanne M. O'Dell
DMO/lww

cc: Hon. Charles R. Rainey, Jr. (bobbwillia@pa.gov)
Cert. of Service

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of **PWSA's Letter**, 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
swebb@pa.gov

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

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

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.
Kryisia Kubiak, City Solicitor, The City of
Pittsburgh Department of Law
City-County Building, Suite 313
414 Grant Street
Pittsburgh, PA 15219
John.doherty@pittsburghpa.gov
kryisia.kubiak@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, Esq.

Dated: June 12, 2023