COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO Consumer Advocate

OFFICE OF CONSUMER ADVOCATE 555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 (800) 684-6560 @pa_oca
pennoca
fAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

June 20, 2023

Via Electronic Mail Only

Deanne O'Dell, Esquire
Daniel Clearfield, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com
dclearfield@eckertseamans.com

Re: Pennsylvania Public Utility Commission

v.

The Pittsburgh Water and Sewer Authority

Docket Nos. R-2023-3039920 R-2023-3039921 R-2023-3039919

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set 11, Set 12, and Set 13 in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Company provide verified answers to these inquiries 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 group e-mail, as listed below:

OCAPWSA2023BRC@paoca.org

Deanne O'Dell, Esquire Daniel Clearfield, Esquire June 20, 2023 Page 2

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,

Christy M. Appleby
Christy M. Appleby

Senior Assistant Consumer Advocate

PA Attorney I.D. # 85824 cappleby@paoca.org

Enclosures:

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

Certificate of Service

*347978

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission

Docket Nos. R-2023-3039920 (Water)

v. :

R-2023-3039921 (Wastewater) R-2023-3039919 (Stormwater)

The Pittsburgh Water and Sewer Authority

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to The Pittsburgh Water and Sewer Authority, Set 11, Set 12, and Set 13 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. This document was filed electronically on the Commission's electronic filing system.

Dated this 20th day of June, 2023.

SERVICE BY E-MAIL ONLY

Scott B. Granger, Esquire
Michael A. Podskoch, Jr., Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
sgranger@pa.gov
mpodskoch@pa.gov
Counsel for I&E

Deanne O'Dell, Esquire
Daniel Clearfield, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com
dclearfield@eckertseamans.com
Counsel for PWSA

Lauren N. Berman, Esquire
Ria M. Pereira, Esquire
Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
Counsel for Pittsburgh United's Our Water
Table

Sharon Webb, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923
swebb@pa.gov
Counsel for OSBA

Christy M. Appleby

Senior Assistant Consumer Advocate

PA Attorney I.D. # 85824 cappleby@paoca.org

Christopher M. Andreoli Gina L. Miller Andrew J. Zerby Assistant Consumer Advocates OCAPWSA2023BRC@paoca.org

Counsel for: Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 Phone: (717) 783-5048

Dated: June 20, 2023