



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

June 20, 2023

**Via Electronic Mail**

Deanne O'Dell, Esq.  
Daniel Clearfield, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)

Re: Pennsylvania Public Utility Commission v.  
The Pittsburgh Water and Sewer Authority  
Docket Nos. R-2023-3039920 (Water); R-2023-3039921 (Wastewater);  
R-2023-3039919 (Stormwater)

Dear Counsel:

Enclosed please find the Bureau of Investigation and Enforcement's ("I&E") **Interrogatories Set RS (nos. 1-3) – Cline** in the above-captioned proceeding. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to these Interrogatories are due within fifteen (15) calendar days of service. Please provide your responses via email to the email addresses listed below.

Copies are being served on parties of record per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Scott B. Granger  
Prosecutor  
Bureau of Investigation and Enforcement  
(717) 425-7593  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

Michael A. Podskoch, Jr.  
Prosecutor  
Bureau of Investigation and Enforcement  
(717) 783-6151  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)

SBG/MAP/ac  
Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter and Certificate of Service only – via e-file*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2023-3039920 (Water)
	:	R-2023-3039921 (Wastewater)
The Pittsburgh Water and Sewer Authority	:	R-2023-3039919 (Stormwater)

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Interrogatories – Set RS** dated June 20, 2023, in the manner and upon the persons listed below:

**Served via Electronic Mail Only**

Deanne O’Dell, Esq.  
Daniel Clearfield, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
*Counsel for PWSA*

Jared Thompson, Esq.  
Peter DeMarco, Esq.  
Natural Resources Defense Council  
1152 15<sup>th</sup> Street, NW, Suite 300  
Washington, DC 20005  
[jared.thompson@nrdc.org](mailto:jared.thompson@nrdc.org)  
[pdemarch@nrdc.org](mailto:pdemarch@nrdc.org)

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](mailto:tjsniscak@hmslegal.com)  
[kjmckeon@hmslegal.com](mailto:kjmckeon@hmslegal.com)  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)

John F. Doherty, Esq.  
Kryisia Kubiak, City Solicitor  
Pittsburgh Department of Law  
City-County Building, Suite 313  
414 Grant Street  
Pittsburgh, PA 15219  
[john.doherty@pittsburghpa.gov](mailto:john.doherty@pittsburghpa.gov)  
[kryisia.kubiak@pittsburghpa.gov](mailto:kryisia.kubiak@pittsburghpa.gov)

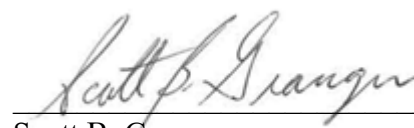
John W. Sweet, Esq.  
Elizabeth R. Marx, Esq.  
Ria M. Pereira, Esq.  
Lauren N. Berman, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

Sharon Webb, Esq.  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[swebb@pa.gov](mailto:swebb@pa.gov)

Christy Appleby, Esq.  
Andrew J. Zerby, Esq.  
Gina L. Miller, Esq.  
Christopher M. Andreoli, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[OCAPWSA2023BRC@paoca.org](mailto:OCAPWSA2023BRC@paoca.org)

Brian Kalcic  
Excel Consulting  
7330 Dorset Avenue  
St. Louis, MO 63130  
[excel.consulting@sbcglobal.net](mailto:excel.consulting@sbcglobal.net)  
*Consultant for OSBA*

Kevin Higgins  
Energy Strategies  
111 East Broadway, Suite 1200  
Salt Lake City, UT 84111  
[khiggins@energystrat.com](mailto:khiggins@energystrat.com)  
*Consultant for OSBA*



Scott B. Granger  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 63641  
(717) 425-7593  
[sgranger@pa.gov](mailto:sgranger@pa.gov)