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June 27, 2023

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

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

Petition of the Pittsburgh Water and Sewer Authority for Authorization to Increase
Water and Wastewater DSIC Charge Caps to 7.5%; Docket Nos. P-2023-3040734
(Water) and P-2023-3040735 (Wastewater)

Petition of the Pittsburgh Water and Sewer Authority for Authorization to Implement
a Customer Assistance Charge; Docket No. P-2023-3040578

**THE CITY OF PITTSBURGH'S PREHEARING CONFERENCE
MEMORANDUM**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission is the City of Pittsburgh's Prehearing Conference Memorandum in the above-referenced proceedings. Copies have been served in accordance with the attached Certificate of Service.

The City notes that it is filing an identical Prehearing Conference Memorandum in each of the above-captioned dockets which PWSA has requested be consolidated but which have not yet been consolidated.

If you have any questions regarding this filing, please contact the undersigned.

Very truly yours,

/s/ Whitney E. Snyder

Whitney E. Snyder
Thomas J. Sniscak
Phillip D. Demanchick

Counsel for the City of Pittsburgh

WES/das/jld
Enclosures

cc: The Honorable Charles E. Rainey, Jr. (crainey@pa.gov)
Krycia Kubiak, City Solicitor (krycia.kubiak@pittsburghpa.gov)
Jesse I. Exilus, Deputy Solicitor (jesse.exilus@pittsburghpa.gov)
John F. Doherty, Associate City Solicitor (john.doherty@pittsburghpa.gov)
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)
Pittsburgh Water and Sewer Authority	:		R-2023-3039919 (Stormwater)
	:		
Petition of the Pittsburgh Water and Sewer Authority for Authorization to Increase Water and Wastewater DSIC Charge Caps to 7.5%	:	Docket Nos.	P-2023-3040734 (Water)
	:		P-2023-3040735 (Wastewater)
	:		
Petition of the Pittsburgh Water and Sewer Authority for Authorization to Implement a Customer Assistance Charge	:	Docket No.	P-2023-3040578
	:		

**THE CITY OF PITTSBURGH'S
PREHEARING CONFERENCE MEMORANDUM**

TO THE HONORABLE GAIL M. CHIDO:

Pursuant to the June 16, 2023 Prehearing Conference Order issued in the above-captioned proceeding, the City of Pittsburgh (“the City”) submits this Prehearing Conference Memorandum.

I. PROPOSED PLAN AND SCHEDULE OF DISCOVERY

The City takes no position on the proposed plan and schedule of discovery, but is willing to work with the parties to reach a mutually acceptable agreement.

II. SETTLEMENT

The City is willing to participate in settlement discussions with the other parties.

III. ISSUES THE CITY MAY ADDRESS

The City has not yet identified any issues it seeks to address at this time. The City, however, reserves its right to investigate and respond to any and all issues raised during its review of PWSA’s filings and discovery or testimony served in this matter.

IV. AMOUNT OF HEARING TIME NEEDED

The City is willing to work with the parties regarding the amount of hearing time needed.

V. WITNESSES

The City may the expert witness testimony of Howard Woods, Principal of Howard J. Woods Jr. & Associates, LLC. Below is the contact information for Mr. Woods:

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

The City also requests that copies of all interrogatories, answers to interrogatories, testimony and exhibits submitted be e-mailed directly to Mr. Woods at howard@howardwoods.com.

The City reserves the right to present additional witnesses should its discovery or its review of responses to the discovery of other parties raise additional issues.

VI. SCHEDULE FOR SUBMISSION, HEARING AND BRIEFS

The City is willing to work with the parties on a mutually agreeable litigation schedule in this matter.

VII. PUBLIC INPUT HEARINGS

The City is willing to work with the parties on a mutually agreeable public input hearing schedule in this matter.

IX. SERVICE

Electronic and hard copy service of all correspondence, discovery, documents, and pleadings to the City should be directed to the City's counsel in this matter:

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For purposes of this prehearing conference, Whitney Snyder will be the primary attorney speaking on behalf of the City.

WHEREFORE, the City of Pittsburgh respectfully submits this Prehearing Conference Memorandum.

Respectfully submitted,

/s/ Whitney E. Snyder

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DATED: June 27, 2023

Attorneys for The City of Pittsburgh

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the forgoing document upon the persons listed below in accordance with the requirements of § 1.54 (relating to service by a party).

VIA ELECTRONIC MAIL ONLY

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/s/ Whitney E. Snyder

Whitney E. Snyder
Thomas J. Sniscak
Phillip D. Demanchick Jr.

DATED: June 27, 2023