COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE 555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 (800) 684-6560

June 27, 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 14 and Set 15 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

PATRICK M. CICERO Consumer Advocate @pa_oca
/pennoca
FAX (717) 783-7152
consumer@paoca.org
www.oca.pa.gov

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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

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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 14 and Set 15, 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 27th 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 Christy M. Appleby

Christy M. Appleby Senior Assistant Consumer Advocate PA Attorney I.D. # 85824 cappleby@paoca.org

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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 27, 2023

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