COMMONWEALTH OF PENNSYLVANIA



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

August 15, 2023

Via Electronic Mail Only

Deanne O'Dell, Esquire Bryce R. Beard, Esquire Daniel Clearfield, Esquire Karen O. Moury, Esquire Lauren M. Burge, Esquire Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8th Floor Harrisburg, PA 17101 dodell@eckertseamans.com bbeard@eckertseamans.com dclearfield@eckertseamans.com kmoury@eckertseamans.com lburge@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 you will find Interrogatories of the Office of Consumer Advocate, Set 20, in the above-referenced proceedings.

In accordance with the Commission's Rules of Practice and Procedure, as modified during the June 29, 2023 Prehearing Conference, we request that PWSA provide verified answers to these inquiries within ten (10) days of service (best efforts). 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.

PATRICK M. CICERO Consumer Advocate Deanne O'Dell, Esquire Bryce R. Beard, Esquire Daniel Clearfield, Esquire Karen O. Moury, Esquire Lauren M. Burge, Esquire August 15, 2023 Page 2

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

OCAPWSA2023BRC@paoca.org

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,

Gina L. Miller Assistant Consumer Advocate PA Attorney I.D. # 313863 gmiller@paoca.org

Enclosures:

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

4886-4945-7015, v. 1

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 20, 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 15th day of August, 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 Bryce R. Beard, Esquire Daniel Clearfield, Esquire Karen O. Moury, Esquire Lauren M. Burge, Esquire Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8th Floor Harrisburg, PA 17101 dodell@eckertseamans.com bbeard@eckertseamans.com dclearfield@eckertseamans.com kmoury@eckertseamans.com lburge@eckertseamans.com 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*

Cheryl R. McAbee, Esquire River Development Corporation 2005 Garrick Drive Pittsburgh, PA 15235 crm121@pitt.edu *Counsel for River Development Corporation*

Alan Michael Seltzer, Esquire *Certificate of Service Page 1 of 2*

Ira Weiss, Esquire

John F. Povilaitis, Esquire Buchanan Ingersoll & Rooney PC 409 N. Second Street, Suite 500 Harrisburg, PA 17101-1357 alan.seltzer@bipc.com john.povilaitis@bipc.com *Counsel for The School District of Pittsburgh*

Whitney E. Snyder, Esquire Thomas J. Sniscak, Esquire Phillip D. Demanchick Jr., Esquire Hawke McKeon & Sniscak LLP 100 North Tenth Street Harrisburg, PA 17101 tjsniscak@hmslegal.com wesnyder@hmslegal.com pddemanchick@hmslegal.com *Counsel for The City of Pittsburgh* Weiss Burkardt Kramer LLC 445 Fort Pitt Boulevard Suite 503 Pittsburgh, PA 15219 iweiss@wbklegal.com Represents the School District of Pittsburgh

Krysia Kubiak, Esquire Jesse I. Exilus, Esquire John F. Doherty, Esquire City of Pittsburgh Department of Law City-County Building, Suite 313 414 Grant Street Pittsburgh, PA 15219 krysia.kubiak@pittsburghpa.gov jesse.exilus@pittsburghpa.gov john.doherty@pittsburghpa.gov *Counsel for The City of Pittsburgh*

Gina L. Miller

Gina L. Miller PA Attorney I.D. # 313863 cappleby@paoca.org

Christy M. Appleby Senior Assistant Consumer Advocate 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: August 15, 2023