

August 21, 2023

Via Email Only

John W. Sweet, Esq.
Elizabeth R. Marx, Esq.
Ria M. Pereira, Esq.
The Pennsylvania Utility Law Project
118 Locust St.
Harrisburg, PA 17101
pulp@pautilitylawproject.org


RE: The Pittsburgh Water and Sewer Authority – Water – R-2023-3039920;
The Pittsburgh Water and Sewer Authority – Wastewater – R-2023-3039921;
The Pittsburgh Water and Sewer Authority – Stormwater – R-2023-3039919

Petition of The Pittsburgh Water and Sewer Authority for Authorization to Implement a
Customer Assistance Charge – Docket No. P-2023-3040678

Dear Counsel:

Attached please find the Pittsburgh Water and Sewer Authority's ("PWSA") updated Response to the Pittsburgh United's Our Water Table ("**United**") **Interrogatories, Set IV, No. 2**, in the above matters. Please note that these discovery responses are being served **via email only**. The narrative responses as well as all attachments are available at Eckert's iManage Share site in the folder: <https://www.imanageshare.com/f/6gD83tQ9v4F>. If you have any problems accessing the documents, please contact me.

Sincerely,



Deanne M. O'Dell

DMO/lww

Enclosure

cc: Cert. of Service w/enc.
Rosemary Chiavetta, Secretary (COS only)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of **PWSA’s updated Response to the United Interrogatories, Set IV, No. 2**, upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

Sharon Webb, Esq.
Office of Small Business Advocate
Forum Place Building
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov

Christine Appleby, Esq.
Chris Andreoli, Esq.
Andrew Zerby, Esq.
Keith Earls, Esq.
Gina Miller, Esq.
Office of Consumer Advocate
555 Walnut St., 5th Fl., Forum Place
Harrisburg, PA 17101-1923
OCAPWSA2023BRC@paoca.org

Scott B. Granger, Esq.
Michael A. Podskoch, Jr., Esq.
Allison C. Kaster, Esq.
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North St., 2nd Floor West
Harrisburg, PA 17120
sgranger@pa.gov
mpodskoch@pa.gov
akaster@pa.gov

John W. Sweet, Esq.
Elizabeth R. Marx, Esq.
Ria M. Pereira, Esq.
The Pennsylvania Utility Law Project
118 Locust St.
Harrisburg, PA 17101
pulp@pautilitylawproject.org

Cheryl R. McAbee, Esq.
2005 Garrick Drive
Pittsburgh, PA 15235
crm121@pitt.edu

Barbara R. Alexander
83 Wedgewood Drive
Winthrop, ME 04364
barbalexand@gmail.com

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
kjmckeon@hmslegal.com
wesnyder@hmslegal.com

John F. Doherty, Esq.
Kryisia Kubiak, City Solicitor, The City of
Pittsburgh Department of Law
City-County Building, Suite 313
414 Grant Street
Pittsburgh, PA 15219
John.doherty@pittsburghpa.gov
kryisia.kubiak@pittsburghpa.gov

Brian Kalcic
Excel Consulting
225 S. Meramec Ave., Suite 720T
St. Louis, MO 63105
Excel.consulting@sbcglobal.net

Alan Michael Seltzer, Esq.
John F. Povilaitis, Esq.
Buchanan Ingersoll & Rooney PC
409 N. Second Street, Suite 500
Harrisburg, PA 17101-1357
alan.seltzer@bipc.com
john.povilaitis@bipc.com



Deanne M. O’Dell, Esq.

Dated: August 21, 2023