

COMMONWEALTH OF PENNSYLVANIA



PATRICK M. CICERO
Consumer Advocate

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

September 1, 2023

Via Electronic Mail Only

Alan Michael Seltzer, 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

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 1, 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 the Pittsburgh School District 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.

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

Alan Michael Seltzer, Esquire
John F. Povilaitis, Esquire
September 1, 2023
Page 2

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,

Christopher M. Andreoli
Christopher M. Andreoli
Assistant Consumer Advocate
PA Attorney I.D. # 85676
gmilller@paoca.org

Enclosures:

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

4886-4945-7015, v. 3

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 School District, Set 1, 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 1st day of September, 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

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

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
Counsel for PWSA

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

Kryisia 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
kryisia.kubiak@pittsburghpa.gov
jesse.exilus@pittsburghpa.gov
john.doherty@pittsburghpa.gov
Counsel for The City of Pittsburgh

Christopher M. Andreoli
Christopher M. Andreoli
PA Attorney I.D. # 85676
candreoli@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: September 1, 2023