



Whitney E. Snyder  
(717) 236-1300 x260  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)

Thomas J. Sniscak  
(717) 236-1300 x224  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)

Phillip D. Demanchick Jr.  
(717) 236-1300 x225  
[pddemanchick@hmslegal.com](mailto:pddemanchick@hmslegal.com)

---

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 [www.hmslegal.com](http://www.hmslegal.com)

September 13, 2023

**VIA EMAIL**

Alan Michael Seltzer, Esq.  
John F. Povilaitis, Esq.  
Buchanon Ingersoll & Rooney PC  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101-1357  
[Alan.seltzer@bipc.com](mailto:Alan.seltzer@bipc.com)  
[John.povilaitis@bipc.com](mailto:John.povilaitis@bipc.com)

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 SUPPLEMENTAL RESPONSE TO THE  
SCHOOL DISTRICT OF PITTSBURGH'S INTERROGATORIES, SET I,  
NO. 3**

Dear Mr. Seltzer and Mr. Povilaitis:

Enclosed you will find the City of Pittsburgh's Supplemental Response to the School  
District of Pittsburgh's Interrogatories, Set I, No. 3.

Alan Michael Seltzer, Esq.  
John F. Povilaitis, Esq.  
September 13, 2023  
Page 2

Copies have been served in accordance with the attached Certificate of Service.

Very truly yours,

*/s/ Phillip D. Demanchick Jr.*

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

*Counsel for the City of Pittsburgh*

PDD/das  
Enclosures

cc: Rosemary Chiavetta, Secretary (via efile of Letter and Certificate of Service)  
Krycia Kubiak, City Solicitor ([krycia.kubiak@pittsburghpa.gov](mailto:krycia.kubiak@pittsburghpa.gov))  
Jesse I. Exilus, Deputy Solicitor ([jesse.exilus@pittsburghpa.gov](mailto:jesse.exilus@pittsburghpa.gov))  
John F. Doherty, Associate City Solicitor ([john.doherty@pittsburghpa.gov](mailto:john.doherty@pittsburghpa.gov))  
Per Certificate of Service

## **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**

Daniel Clearfield, Esq.  
Deanne M. O'Dell, Esq.  
Bryce R. Beard, Esq.  
Karen O Moury, Esq.  
Lauren M Burge Esquire  
Eckert Seamans Cherin & Mellott LLC  
213 Market Street  
8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[bbeard@eckertseamans.com](mailto:bbeard@eckertseamans.com)  
[kmoury@eckertseamans.com](mailto:kmoury@eckertseamans.com)  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)

*Counsel for Pittsburgh Water and  
Sewer Authority*

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](mailto:sgranger@pa.gov)  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)  
[akaster@pa.gov](mailto:akaster@pa.gov)

Christy M. Appleby, Esq.  
Andrew J. Zerby, Esq.  
Gina L Miller, Esq.  
Christopher M. Andreoli, Esq.  
Office of Consumer Advocate  
555 Walnut St., 5th Fl.,  
Forum Place  
Harrisburg, PA 17101-1923  
[cappleby@paoca.org](mailto:cappleby@paoca.org)  
[azerby@paoca.org](mailto:azerby@paoca.org)  
[gmiller@paoca.org](mailto:gmilller@paoca.org)  
[candreoli@paoca.org](mailto:candreoli@paoca.org)  
[OCAPWSA2023BRC@paoca.org](mailto:OCAPWSA2023BRC@paoca.org)

Lauren Berman, Esq.  
Ria Pereira, Esq.  
Elizabeth R Marx, Esq.  
John Sweet, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[lberman@pautilitylawproject.org](mailto:lberman@pautilitylawproject.org)  
[rpereira@pautilitylawproject.org](mailto:rpereira@pautilitylawproject.org)  
[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)  
[jsweet@pautilitylawproject.org](mailto:jsweet@pautilitylawproject.org)  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

*Counsel for Pittsburgh United's Our Water  
Table*

Sharon E. Webb, Esq.  
Office of Small Business Advocate  
Forum Place Building  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)

Alan Michael Seltzer, Esq.  
John F. Povilaitis, Esq.  
Buchanon Ingersoll & Rooney PC  
409 N. Second Street, Suite 500  
Harrisburg, PA 17101-1357  
[Alan.seltzer@bipc.com](mailto:Alan.seltzer@bipc.com)  
[John.povilaitis@bipc.com](mailto:John.povilaitis@bipc.com)

*Counsel for School District of Pittsburgh*

Cheryl McAbee Esquire  
River Development Corporation  
2005 Garrick Drive  
Pittsburgh PA 15235  
[crm121@pitt.edu](mailto:crm121@pitt.edu)

*Counsel for River Development Corporation*

Katherine Shingler  
1030 King Avenue  
Pittsburgh, PA 15206  
[kshingler1@gmail.com](mailto:kshingler1@gmail.com)

*Pro Se*

Brian Kalcic  
Excel Consulting  
225 S. Meramec Ave., Suite 720T  
St. Louis, MO 63105  
[Excel.consulting@sbcglobal.net](mailto:Excel.consulting@sbcglobal.net)

Ira Weiss, Esq.  
Weiss Burkardt Kramer LLC  
445 Fort Pitt Boulevard Suite 503  
Pittsburgh Pa 15219  
[iweiss@wbklegal.com](mailto:iweiss@wbklegal.com)

*Counsel for School District of Pittsburgh*

Jonathan Bergholz  
1418 Pennsylvania Avenue  
Pittsburgh Pa 15233  
[Transcoord@Aol.Com](mailto:Transcoord@Aol.Com)

*Pro Se*

Lisa Banal  
1716 Spring Garden Avenue  
Pittsburgh PA 15212  
[lisa.a.banal@gmail.com](mailto:lisa.a.banal@gmail.com)

*Pro Se*

Renee Abrams  
1433 Browning Road  
Pittsburgh PA 15206  
[reneabrams@aol.com](mailto:reneabrams@aol.com)

*Pro Se*

Barbara R. Alexander  
83 Wedgewood Drive  
Winthrop, ME 04364  
[barbalexand@gmail.com](mailto:barbalexand@gmail.com)

*/s/ Phillip D. Demanchick Jr.*

---

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

DATED: September 13, 2023