

September 22, 2023

Deanne M. O'Dell, Esq.  
717.255.3744  
dodell@eckertseamans.com

**Via Email Only**

Christine Appleby, Esq.  
Chris Andreoli, Esq.  
Andrew Zerby, Esq.  
Keith Earls, Esq.  
Gina Miller, Esq.  
Office of Consumer Advocate  
555 Walnut St., 5<sup>th</sup> Fl., Forum Place  
Harrisburg, PA 17101-1923

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") Corrected Response to the Office of Consumer Advocate ("**OCA**") **Interrogatories, Set XXI, No. 1** in the above-referenced matters. The referenced attachments in the narrative response to OCA-XXI-1 as served September 21, 2023 has been corrected in the enclosed to reflect the reference to attachment OCA-XXI-1 as no Attach A or Attach B is being provided in response to this request. 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 Corrected Response to OCA's Interrogatories, Set XXI, No. 1**, 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](mailto: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., 5<sup>th</sup> Fl., Forum Place  
Harrisburg, PA 17101-1923  
[OCAPWSA2023BRC@paoca.org](mailto: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., 2<sup>nd</sup> 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)

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](mailto:pulp@pautilitylawproject.org)

Cheryl R. McAbee, Esq.  
2005 Garrick Drive  
Pittsburgh, PA 15235  
[crm121@pitt.edu](mailto:crm121@pitt.edu)

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

John F. Doherty, Esq.  
Krysia 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](mailto:John.doherty@pittsburghpa.gov)  
[krysia.kubiak@pittsburghpa.gov](mailto:krysia.kubiak@pittsburghpa.gov)

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



---

Deanne M. O'Dell, Esq.

Dated: September 22, 2023