

October 3, 2023

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120

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 Secretary Chiavetta:

On behalf of The Pittsburgh Water and Sewer Authority (“PWSA”) enclosed for electronic filing is PWSA Hearing Exhibit 1 which identifies PWSA’s Testimony and Exhibits to be introduced for the record as well as PWSA Hearing Exhibit 2 which is a Joint Stipulation between PWSA and the Office of Consumer Advocate. PWSA intends to submit both Hearing Exhibits as well as the referenced Testimony and Exhibits for admission into the record during the evidentiary hearing scheduled for October 4-6, 2023. This document is being served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O’Dell

DMO/lww

Enclosure

cc: Hon. Gail M. Chiodo w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of **PWSA's Hearing Exhibit 1 and Hearing Exhibit 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

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	Docket Nos. R-2023-3039919 (Stormwater)
	:	R-2023-3039920 (Water)
V.	:	R-2023-3039921 (Wastewater)
	:	
PITTSBURGH WATER AND SEWER AUTHORITY	:	

**TESTIMONY AND EXHIBITS OF
PITTSBURGH WATER AND SEWER AUTHORITY**

Initial Filing	Volumes
Rate Filing Package Dated May 9, 2023	Volume I: Statement of Reasons, Customer Notice of Proposed Rate Changes and Filing Requirements
<i>With below referenced correction previously filed:</i>	
<ul style="list-style-type: none"> • Revised Schedule FR III.2 as filed June 22, 2023 • Second Revised Schedule FR III.1 as filed July 12, 2023 	

Direct Testimony (dated 5/9/23)	Witness	Exhibits
PWSA St. No. 1	Direct Testimony of William J. Pickering	WJP-1, WJP-2
PWSA St. No. 2 (as revised 9/6/23)	Direct Testimony of Edward Barca	EB-1 to EB-9
PWSA St. No. 3	Direct Testimony of William J. McFaddin	None
PWSA St. No. 4	Direct Testimony of Barry King	BK-1 to BK-4
PWSA St. No. 5	Direct Testimony of Tony Igwe	Appendix A, TI-1 to TI-2
PWSA St. No. 6	Direct Testimony of Julie A. Mechling	JAM-1 to JAM-16
PWSA St. No. 7	Direct Testimony of Harold J. Smith	HJS-1 to HJS-2, HJS-1W to HJS-25W, HJS-1WW to HJS-24WW, HJS-1SW to HJS-13SW
PWSA St. No. 8	Direct Testimony of Keith Readling	Appendix A, KR-1 to KR-2
PWSA St. No. 9	Direct Testimony of Christine M. Fay	Appendix A, CF-1 to CF-9

Rebuttal Testimony (dated 9/8/23)	Witness	Exhibits
PWSA St. No. 1-R	Rebuttal Testimony of William J. Pickering	WJP-3 to WJP-4
PWSA St. No. 2-R	Rebuttal Testimony of Edward Barca	EB-10 to EB-14
PWSA St. No. 3-R	Rebuttal Testimony of William J. McFaddin	None
PWSA St. No. 4-R	Rebuttal Testimony of Barry King	BK-5
PWSA St. No. 5-R	Rebuttal Testimony of Tony Igwe	TI-3 to TI-7
PWSA St. No. 6-R	Rebuttal Testimony of Julie A. Mechling	JAM-17 to JAM-24

PWSA Hearing Exhibit No. 1

Rebuttal Testimony (dated 9/8/23)	Witness	Exhibits
PWSA St. No. 7-R	Rebuttal Testimony of Harold Smith	Exhibit A, HJS-1-R to HJS-2-R, HJS-1W-R to HJS-25W-R, HJS-1WW-R to HJS-24WW-R, HJS-1SW-R to HJS-13SW-R
PWSA St. No. 8-R	Rebuttal Testimony of Keith Readling	KR-3
PWSA St. No. 9-R	Rebuttal Testimony of Christine M. Fay	CF-10 to CF-13

Rejoinder Testimony (dated 9/29/23)	Witness	Exhibits
PWSA St. No. 2-RJ	Rejoinder Testimony of Edward Barca	EB-15
PWSA St. No. 4-RJ	Rejoinder Testimony of Barry King	None
PWSA St. No. 5-RJ	Rejoinder Testimony of Tony Igwe	None
PWSA St. No. 6-RJ	Rejoinder Testimony of Julie A. Mechling	None
PWSA St. No. 8-RJ	Rejoinder Testimony of Keith Readling	KR-4 to KR-5
PWSA St. No. 9-RJ	Rejoinder Testimony of Christine M. Fay	None

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	Docket Nos. R-2023-3039919 (Stormwater)
	:	R-2023-3039920 (Water)
V.	:	R-2023-3039921 (Wastewater)
	:	
PITTSBURGH WATER AND SEWER AUTHORITY	:	

JOINT STIPULATION OF THE PITTSBURGH WATER AND SEWER AUTHORITY AND OFFICE OF CONSUMER ADVOCATE


The Pittsburgh Water and Sewer Authority (“PWSA”) and the Office of Consumer Advocate (together, the “Stipulating Parties”) by their respective counsel, hereby enter into a Joint Stipulation with regard to the above-captioned proceeding as follows.

1. The Stipulating Parties agree to the entry of the testimony of each party into the record and each agrees to waive cross of the other party’s witness(es).
2. The Stipulating Parties agree to the entry of the below reference and attached discovery responses into the record:
 - PWSA Responses to OCA-XXI-1 and OCA-XXI-2 and supporting Attachment OCA-XXI-1
 - OCA Responses to PWSA-I-19, PWSA-I-20 and PWSA-II-7.

Dated: October 3, 2023

Respectfully submitted,

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*Counsel for
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*Counsel for
The Pittsburgh Water and Sewer Authority*

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
to the Interrogatories of the Office of Consumer Advocate (“OCA”), Set XXI (21)**

Docket Nos. R-2023-3039920, R-2023-3039921, & R-2023-3039919

Request: OCA-XXI-1 Reference PWSA Statement. No. 3-R, page 2, lines 2-7. For each newly metered property, please provide monthly usage and costs/rates by component since being metered and identify the monthly charge that would have been applicable if the property was not metered.

Corrected Response: See attachment OCA-XXI-1. Consistent with PWSA’s Tariff Water – Pa. P.U.C. No. 1, Section A.1, Page No. 9, unmetered City of Pittsburgh accounts should be billed in accordance with the Cooperation Agreement pursuant to 71 P.S. §§ 720.211 to 720.213.

Response provided by: William McFaddin, Director of Operations.

Date response provided: September 22, 2023

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
to the Interrogatories of the Office of Consumer Advocate (“OCA”), Set XXI (21)**

Docket Nos. R-2023-3039920, R-2023-3039921, & R-2023-3039919

Request: OCA-XXI-2 Will PWSA be adjusting its revenue projections to account for revenue from the newly metered properties referenced in PWSA Statement. No. 3-R, page 2? If so, indicate the amount of revenue for each property and how PWSA will account for it in this rate case. If not, explain why not.

Response: PWSA’s revenue projections assumed that all City properties would be metered. Therefore, no revenue projections are being proposed.

Response provided by: Edward Barca, Director of Finance

Date response provided: September 21, 2023

Premise Address	Document Number	Posting Date	Net Due Date	Days of Service	Consumption			Wastewater Conveyance		Wastewater			Total Billed
					in TGALS	Water Minimum	Water Usage	Minimum	Conveyance Usage	ALCOSAN	Stormwater	DSIC	
	50000011890	9/13/2023	10/3/2023	8/1/23-8/31/23	51	\$161.48	\$452.64	\$36.95	\$173.02	\$538.19	\$357.75	\$41.21	\$1,761.24
	50000011889	9/13/2023	10/3/2023	7/1/23-7/31/23	79	\$161.48	\$761.76	\$36.95	\$291.18	\$829.67	\$357.75	\$62.57	\$2,501.36
	50000011888	9/13/2023	10/3/2023	6/1/23-6/30/23	45	\$161.48	\$386.40	\$36.95	\$147.70	\$475.73	\$357.75	\$36.62	\$1,602.63
	50000011887	9/13/2023	10/3/2023	5/2/23-5/31/23	20	\$161.48	\$110.40	\$36.95	\$42.20	\$215.48	\$357.75	\$17.55	\$941.81
	50000011886	9/13/2023	10/3/2023	4/1/23-5/1/23	8	\$161.48	\$0.00	\$36.95	\$0.00	\$90.56	\$357.75	\$9.92	\$656.66
	50000011885	9/13/2023	10/3/2023	3/1/23-3/31/23	9	\$161.48	\$0.00	\$36.95	\$0.00	\$100.97	\$357.75	\$9.92	\$667.07
	50000011876	9/13/2023	10/3/2023	2/3/23-2/28/23	45	\$161.48	\$386.40	\$36.95	\$147.70	\$475.73	\$357.75	\$36.62	\$1,602.63
	50000011963	9/13/2023	10/3/2023	8/1/23-8/31/23	1654	\$269.82	\$18,072.48	\$61.03	\$6,908.14	\$17,225.42	\$174.90	\$1,265.58	\$43,977.37
	50000011962	9/13/2023	10/3/2023	7/1/23-7/31/23	3966	\$269.82	\$43,596.96	\$61.03	\$16,664.78	\$41,293.34	\$174.90	\$3,029.63	\$105,090.46
	50000011961	9/13/2023	10/3/2023	6/13/23-6/30/23	2615	\$159.67	\$28,759.20	\$36.12	\$10,993.10	\$27,229.43	\$174.90	\$1,997.40	\$69,349.82

Pennsylvania Public Utility Commission
v.
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Docket Nos. R-2023-3039919 (Stormwater)
R-2023-3039920 (Water)
R-2023-3039921 (Wastewater)
2023 Base Rate Case Proceeding

Responses to PWSA
Interrogatories to OCA Set I

19. Does Dr. Pavlovic agree that, to the extent that PWSA's revenues expenses or capital expenditures levels turn out to be different than those currently projected, any resulting gain or loss will be reflected in PWSA's cash balance and will be reflected in future determinations of PWSA's revenue requirement? If not, why not?

Response: Yes, but Dr. Pavlovic does not agree that the state of PWSA's actual cash balance at the end of the proposed MYRP period (2024-2026) in this proceeding is relevant to whether the rates proposed for 2024 -2026 protect ratepayers against unjust and unreasonable rates.

Sponsoring Witness: Karl Pavlovic

Pennsylvania Public Utility Commission
v.
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2023 Base Rate Case Proceeding

Responses to PWSA
Interrogatories to OCA Set I

20. Please refer to OCA St. 2 at 8-9:

- (a) Would the MYRP be acceptable to witness Pavlovic if it included the procedures set forth on pages 8 and 9 of his direct testimony regarding Rhode Island?
- (b) Is there a set of procedures and safeguards that, if mandated along with the MYRP, would make the mechanism acceptable to Dr. Pavlovic? If so, please identify those procedures and/or safeguards.

Response:

- (a) No. While Dr. Pavlovic agrees that including the procedures would provide at least some guardrails on PWSA's MYRP, it would not cure all of the deficiencies identified in his direct testimony.
- (b) No. See response to (a) above.

Sponsoring Witness: Karl Pavlovic

Pennsylvania Public Utility Commission
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2023 Base Rate Case Proceeding

Responses to PWSA
Interrogatories to OCA Set II

7. Reference OCA St. 2, page 24 at 7-9, can Mr. Pavlovic elaborate on the capital asset financing that is less expensive than long term debt?

Response: PWSA's non-DSIC PAYGO financing is less expensive than long term debt. See OCA St. No. 2, page 25 lines 12-17 and PWSA St. No. 2, page 27 line 21 to page 28 line 4.

Sponsoring Witness: Karl Pavlovic