



October 5, 2018

Daniel Clearfield, Esq.  
Deanne M. O'Dell, Esq.  
Carl R. Schultz, Esq.  
Karen Moury, Esq.  
213 Market Street, 8th Floor  
Harrisburg, PA 17101

**Re: PA Public Utility Commission v. Pittsburgh Water and Sewer Authority**  
*Docket Nos. R-2018-3002645, R-2018-3002647*

Counsel:

Enclosed, please find the **Amended Response of Pittsburgh UNITED to the Interrogatories of Pittsburgh Water and Sewer Authority, Set I-2**. Both a redline and clean version of the amended response are enclosed.

Respectfully submitted,

Elizabeth R. Marx  
*Co-Counsel for Pittsburgh UNITED*

CC: Certificate of Service

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania Public Utility Commission** :  
:  
v. : **Docket No. R-2018-3002645**  
:  
:  
**Pittsburgh Water and Sewer Authority** : **R-2018-3002647**  
:  
:

---

**Certificate of Service**

I hereby certify that I have this day served copies of the **Amended Response of Pittsburgh UNITED to the Interrogatories of Pittsburgh Water and Sewer Authority, Set I-2**, upon the parties of record in the above-captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

**VIA FIRST CLASS MAIL AND/OR EMAIL**

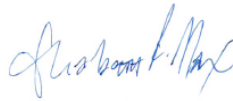
*Daniel Clearfield, Esq. *Deanne M. O'Dell, Esq. *Carl R. Schultz, Esq. *Karen Moury, Esq. 213 Market Street, 8 <sup>th</sup> Floor Harrisburg, PA 17101 <a href="mailto:dclearfield@eckertseamans.com">dclearfield@eckertseamans.com</a> <a href="mailto:cshultz@eckertseamans.com">cshultz@eckertseamans.com</a> <a href="mailto:dodell@eckertseamans.com">dodell@eckertseamans.com</a>	*Debbie Marie Lestitian, Esq. Pittsburgh Water and Sewer Authority Penn Liberty Plaza 1 1200 Penn Avenue Pittsburgh, PA 15222 <a href="mailto:dlestitian@pgh2o.com">dlestitian@pgh2o.com</a>
*Gina L. Miller, Esq. *John M. Coogan, Esq. Bureau of Investigation and Enforcement 400 North Street 2nd Floor West Harrisburg, PA 17120 <a href="mailto:ginmiller@pa.gov">ginmiller@pa.gov</a> <a href="mailto:jcoogan@pa.gov">jcoogan@pa.gov</a>	*Christine M. Hoover, Esq. *Erin L. Gannon, Esq. *Lauren M. Burge, Esq. Office of Consumer Advocate 555 Walnut Street 5th Floor Forum Place Harrisburg, PA 17101 <a href="mailto:OCAPWSA2018@paoca.org">OCAPWSA2018@paoca.org</a>
Susan Simms Marsh, Esquire Pennsylvania-American Water Company 800 West Hersheypark Drive Hershey, PA 17033 <a href="mailto:susan.marsh@amwater.com">susan.marsh@amwater.com</a>	Michael A. Gruin, Esquire Stevens & Lee 17 North Second Street, 16th Floor Harrisburg, PA 17101 <a href="mailto:mag@stevenslee.com">mag@stevenslee.com</a>

<p>*Elizabeth Rose Triscari, Esq.          *Sharon Webb, Esq.          Office of Small Business Advocate          300 North Second Street, Suite 202          Harrisburg, PA 17101  <a href="mailto:etriscari@pa.gov">etriscari@pa.gov</a>  <a href="mailto:swebb@pa.gov">swebb@pa.gov</a></p>	<p>James Ferlo          1118 N. St. Clair St.          Pittsburgh, PA 15206</p>
<p>David P. Zambito, Esq.          Jonathan P. Nase, Esq.          Cozen O’Conner          17 North Second Street          Suite 1410          Harrisburg, PA 17101  <a href="mailto:dzambito@cozen.com">dzambito@cozen.com</a>  <a href="mailto:jnase@cozen.com">jnase@cozen.com</a></p>	<p>William H. Roberts II, Esq.          PNG Companies LLC          375 North Shore Drive          Pittsburgh, PA 15212  <a href="mailto:William.h.robertsii@peoples-gas.com">William.h.robertsii@peoples-gas.com</a></p>
<p>*Tishekia Williams, Esq.          Michael Zimmerman, Esq.          *Emily M. Farah, Esq.          *David Fisis, Esq.          Duquesne Light Company          411 Seventh Ave., 15<sup>th</sup> Floor          Pittsburgh, PA 15219  <a href="mailto:Twilliams@duqlight.com">Twilliams@duqlight.com</a>  <a href="mailto:mzimmerman@duqlight.com">mzimmerman@duqlight.com</a>  <a href="mailto:efarah@duqlight.com">efarah@duqlight.com</a></p>	<p>EMAIL ONLY:          Brian Kalcic,  <a href="mailto:excel.consulting@sbcglobal.net">excel.consulting@sbcglobal.net</a></p>

\*Indicates parties subject to the Protective Order

Respectfully submitted,

**PENNSYLVANIA UTILITY LAW PROJECT**  
*Co-Counsel for Pittsburgh UNITED*



Elizabeth R. Marx, PA ID 309014  
 118 Locust Street  
 Harrisburg, PA 17101  
 717-236-9486  
[emarxpulp@palegalaid.net](mailto:emarxpulp@palegalaid.net)

October 5, 2018