

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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February 25, 2019

Daniel Clearfield, Esquire
Deanne M. O'Dell, Esquire
Karen O. Moury, Esquire
Carl R. Shultz, Esquire
Eckert, Seamans, Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101

Re: Implementation of Chapter 32 of the Public
Utility Code Regarding Pittsburgh Water
and Sewer Authority – Stage 1
Docket Nos. M-2018-2640802
M-2018-2640803

Petition of The Pittsburgh Water and Sewer
Authority for Approval of Its Long-Term
Infrastructure Improvement Plan
Docket Nos. P-2018-3005037
P-2018-3005039

Dear Counsel:

Enclosed you will find two copies of the Interrogatories of the Office of Consumer Advocate, Set I, in the above-referenced proceeding.

In accordance with the Commission's Rules of Practice and Procedure and the Prehearing Order entered in this case on December 27, 2018, we request that the Authority make best effort to provide verified answers to these inquiries within ten (10) days, but no later than fifteen (15) days of service. 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 consultant, as listed below:

Barbara R. Alexander
83 Wedgewood Drive
Winthrop, ME 04364
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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).

Very truly yours,



Lauren M. Burge
Assistant Consumer Advocate
PA Attorney I.D. 311570
E-Mail: LBurge@paoca.org

Enclosures:

cc: PUC Secretary Chiavetta, (Letter and Certificate of Service only)
Certificate of Service
*266983

CERTIFICATE OF SERVICE

Re: Implementation of Chapter 32 of the Public	:	Docket Nos.	M-2018-2640802
Utility Code Regarding Pittsburgh Water and	:		M-2018-2640803
Sewer Authority – Stage 1	:		
	:		
Petition of The Pittsburgh Water and Sewer	:		
Authority for Approval of Its Long-Term	:	Docket Nos.	P-2018-3005037
Infrastructure Improvement Plan	:		P-2018-3005039

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories, Set I to Pittsburgh Water and Sewer Authority, 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:

Dated this 25th day of February 2019.

SERVICE BY E-MAIL and INTER-OFFICE MAIL

Gina L. Miller, Esquire
John M. Coogan, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
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Harrisburg, PA 17120

SERVICE BY E-MAIL and FIRST CLASS MAIL, POSTAGE PREPAID

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Dated: February 25, 2019
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