

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

February 28, 2019

Via Email and First Class Mail

Gina L. Miller, Esq.
John M. Coogan, Esq.
Bureau of Investigation & Enforcement
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

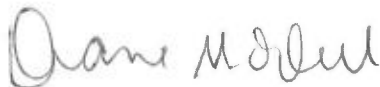
Re: Implementation of Chapter 32 of the Public Utility Code RE: Pittsburgh Water
and Sewer Authority; Docket Nos. M-2018-2640802 and M-2018-2640803

Dear Counsel:

Enclosed please find Pittsburgh Water and Sewer Authority's ("PWSA") Responses to Bureau of Investigation and Enforcement's ("I&E") Interrogatories **PS-22 through PS-42 and RB-12 through RB-56** with regard to the above-referenced matters. Also enclosed is the **Second Supplemental Response to I&E-RE-13**. Hard copies to be served in accordance with the attached Certificate of Service.

The discovery responses including the attachments (if any) are available at ESCM Share File site. To receive access, please contact Deanne O'Dell (dodell@eckertseamans.com) or 717-255-3744 and provide the name and email address of the person seeking access.

Sincerely,



Deanne M. O'Dell

DMO/lww
Enclosure

cc: Cert. of Service w/enc.
Rosemary Chiavetta, (COS only)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the PWSA's Responses to **I&E-PS-22** through **I&E-PS-42** and **I&E-RB-12** through **I&E-RB-56** and **Second Supplemental Response to I&E-RE-13** upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email and/or First Class Mail

Sharon Webb, Esq.
Erin K. Fure, Esq.
Office of Small Business Advocate
300 North Second St., Suite 202
Harrisburg, PA 17101
swebb@pa.gov
efure@pa.gov

Christine Maloni Hoover, Esq.
Lauren M. Burge, Esq.
Erin L. Gannon, Esq.
Office of Consumer Advocate
555 Walnut St., 5th Fl., Forum Place
Harrisburg, PA 17101-1923
choover@paoca.org
lburge@paoca.org
egannon@paoca.org

Gina L. Miller, Esq.
John M. Coogan, Esq.
Bureau of Investigation & Enforcement
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
ginmiller@pa.gov
jcoogan@pa.gov

Elizabeth R. Marx, Esq.
John Sweet, Esq.
Patrick M. Cicero, Esq.
Kadeem G. Morris, Esq.
The Pennsylvania Utility Law Project
118 Locust St.
Harrisburg, PA 17101
pulp@palegalaid.net

Dated: February 28, 2019

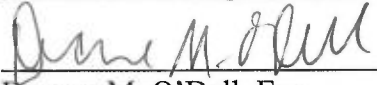
Susan Simms Marsh, Esq.
Pennsylvania-American Water Company
800 West Hersheypark Drive
Hershey, PA 17033
Susan.marsh@amwater.com

Michael A. Gruin, Esq.
Stevens & Lee
17 North Second St., 16th Fl.
Harrisburg, PA 17101
mag@stevenslee.com

Dimple Chaudhary, Esquire
Peter J. DeMarco, Esquire
Cecilia Segal, Esquire
Natural Resources Defense Council
1152 15th Street, NW, Ste. 300
Washington, DC 20005
dchaudhary@nrdc.org
pdemarco@nrdc.org
csegal@nrdc.org

Michelle Nacarati Chapkis
Mayor's Blue Ribbon Panel on
Restructuring the PWSA Care of Women for
a Healthy Environment
5877 Commerce St.
Pittsburgh, PA 15206

Brian Kalcic
Excel Consulting
225 S. Meramec Ave., Suite 720T
St. Louis, MO 63105
Excel.consulting@sbcglobal.net


Deanne M. O'Dell, Esq.