

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560

FAX (717) 783-7152
consumer@paoca.org

March 1, 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 III, 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:

Ashley E. Everette
Office of Consumer Advocate
5th Floor, Forum Place
555 Walnut Street
Harrisburg, PA 17101
AEverette@paoca.org

Daniel Clearfield, Esquire
Deanne M. O'Dell, Esquire
Karen O. Moury, Esquire
Carl R. Shultz, Esquire
March 1, 2019
Page 2

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
*267389

CERTIFICATE OF SERVICE

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

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories, Set III 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 1st day of March 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
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

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

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

Sharon E. Webb, Esquire
Erin K. Fure, Esquire
Office of Small Business Advocate
300 North Second Street
Suite 202
Harrisburg, PA 17101

Michael A. Gruin, Esquire
Stevens & Lee
17 North Second Street, 16th Floor
Harrisburg, PA 17101

Susan Simms Marsh, Esquire
Pennsylvania American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055

Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Patrick M. Cicero, Esquire
Kadeem G. Morris, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Peter Demarco, Esquire
Dimple Chaudhary, Esquire
Cecilia Segal, Esquire
Natural Resources Defense Council
1152 Fifteenth Street Northwest
Suite 300
Washington, DC 20005

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

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

Christine Maloni Hoover
Senior Assistant Consumer Advocate
PA Attorney I.D. # 50026
E-Mail: CHoover@paoca.org

Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
E-Mail: EGannon@paoca.org

Counsel for Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: March 1, 2019
*267390