

Daniel Clearfield
717-237-7173
dclearfield@eckertseamans.com

May 6, 2019

Via Email and First Class Mail

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

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

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 Counselors:

Enclosed please find the **Updated** Response of Pittsburgh Water and Sewer Authority ("PWSA") to Pittsburgh UNITED Interrogatory, Set VIII-1 with regard to the above-referenced matter. 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,



Daniel Clearfield
DC/lww

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

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PWSA's **Updated** Response to UNITED Set VIII-1 Interrogatory upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via First Class Mail and/or Email

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

Susan Simms Marsh, Esq.
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
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

Dated: May 6, 2019


Daniel Clearfield, Esq.