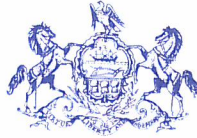


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

 @pa\_oqa

 /pennoca

FAX (717) 783-7152  
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May 14, 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, 8<sup>th</sup> 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 VII, 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  
5<sup>th</sup> Floor, Forum Place  
555 Walnut Street  
Harrisburg, PA 17101  
[AEverette@paoca.org](mailto:AEverette@paoca.org)

Daniel Clearfield, Esquire  
Deanne M. O'Dell, Esquire  
Karen O. Moury, Esquire  
Carl R. Shultz, Esquire  
May 14, 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,

A handwritten signature in black ink, appearing to read "Lauren M. Burge", with a stylized flourish at the end.

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

Enclosures:

cc: PUC Secretary Chiavetta, (Letter and Certificate of Service only)  
Certificate of Service  
\*272341

# 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 VII 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 14<sup>th</sup> day of May 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  
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Pittsburgh, PA 15206

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Erin K. Fure, Esquire  
Office of Small Business Advocate  
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John W. Sweet, Esquire  
Patrick M. Cicero, Esquire  
Kadeem G. Morris, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

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Dimple Chaudhary, Esquire  
Cecilia Segal, Esquire  
Natural Resources Defense Council  
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/s/ Lauren M. Burge  
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Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: May 14, 2019  
\*272344