

BEFORE THE PENNSYLVANIA UTILITY COMMISSION

JOHN MUSGRAVE IV

DOCKET NUMBER C-2020-3020714

Complainant

REPLY TO NEW MATTER

vs.

THE PITTSBURGH WATER AND SEWER AUTHORITY

Counsel of Record For This Party:

Respondent

**John K. Musgrave IV
6059 Bunkerhill Street
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RECEIVED

AUG 29 2020

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

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REPLY TO NEW MATTER

Pursuant to 52 Pa. Code Section 5.61, John Musgrave IV submits this Reply to New Matter to the Answer with New Matter of the Pittsburgh Water and Sewer Authority which was served on August 10, 2020. In support of this Reply, John Musgrave IV avers the following:

INTRODUCTION

In his Formal Complaint, the Complainant is claiming that the water at the subject property does not contain adequate chlorine levels. The Complainant claims that there is not enough chlorine in the water, and it is affecting the safety of his water. Additionally, the Complainant requests the PUC order PWSA to build a new water service line to the subject property because the main line breaks frequently, the party line has been abandoned for disrepair, and his house is currently being supplied with water from a hose attached to the hydrant which will soon freeze when the fall weather comes. The Complainant does not believe that he or his neighbors should be required to pay for their own water line replacement. He also states that there is no proof that the water line to the subject property is a private service line.

A. HISTORY

1. The Complainant's home is at 6059 Bunkerhill Street in the Highland Park neighborhood of Pittsburgh in Pennsylvania. The residence at 6059 Bunkerhill is at the end of the dead-end street. There is a 6 inch main water line which runs down Bunkerhill, and then it branches off

into a 2-inch party line that until a couple of years ago supplied water to the last 6 houses on the street. The junction of the 6-inch main running down Bunkerhill and the 2-inch party line occurs near a hydrant and near the residence of 6041 Bunkerhill. The end of Bunkerhill also receives water from a line that comes up from the bottom of Sheridan Avenue and attaches to the Bunkerhill main near the hydrant at the end of Bunkerhill.

2. The first break on the party line occurred around 2007 near 6059 Bunkerhill. The second break on the party line occurred in the spring / winter of 2015 at 6049 Bunkerhill. The third break in the party line occurred 3/20/17 under the street between 6041 and 6045 Bunkerhill. The forth break on the party line occurred on 1/22/18 near 6059 Bunkerhill Street. At the time of this break, the Complainant asked PWSA to provide evidence that the party line was private. PWSA's main evidence turned over to the Complainant was 2 documents: an "Application and Contract for Water Supply" stamped December 31, 1928 (Exhibit #1) and a "Order to Driller" stamped January 7, 1929 (Exhibit #2). On 2/13/18 Rick Obermeier, Director of Field Operations for PWSA, held a meeting with the members of the party line. At this meeting he said that he thought the only way we could get clean water to the end of Bunkerhill would be to run a water line from the hydrant at the end of Bunkerhill to the bottom of Sheridan Avenue. He said that PWSA Engineering would work designing this plan for a few months and that he would get back to us on the plans, but this never happened. The fifth break on the party line occurred on 2/13/18 at 6045 Bunkerhill. On 3/14/18, three homes that were on the party line (6041, 6045, and 6049), broke off of the party line and built their own individual lines to the main leaving 3 homes still on the party line (6053, 6055, and 6059). Within 9 months between 11/13/19 and 7/27/20, the 6-inch main broke 7 times within the same 150 foot stretch of street from 6020 Bunkerhill to 6031 Bunkerhill. The dates of these breaks were 11/13/19, 4/26/20, 6/2/20, 6/7/20, 6/28/20, 7/13/20, and 7/27/20. The sixth break on the party line occurred on 7/27/20 at 6041 Bunkerhill Street, the same day the main line also broke. The first 3 breaks on the party line were repaired by PWSA at their expense. For the last 3 breaks on the party line, the homeowners had to hire their own plumbers to make the repairs. For this last repair attempt on 7/27/20, the plumber had to abandon the party line because after patching one hole in the line, more holes were found under the street when the water was turned back on. On 7/30/20, PWSA removed the auto-flusher from the hydrant at the end of Bunkerhill and installed a hose bib set. The Complainant was then asked by Rick Obermeier, Director of Field Operations for PWSA, to run hoses from the hydrant to the last 3 homes on Bunkerhill which he did. The homeowners had to buy their own hoses to be run from the hydrant because PWSA did not have any to offer. The last 3 houses on Bunkerhill are presently getting water from hoses run from the hydrant and are waiting for plans from PWSA Engineering explaining where the new water lines should be run. With fall approaching, there is not much time to get the new water lines built before the hoses freeze.

3. Low chlorine concentrations only appear to be a concern during the warmer weather of May through November because the chlorine seems to dissipate quicker in the heat. The complainant began testing the free chlorine level in the water at his home beginning 5/5/18. At this time he used as his testing device the Lovibond Checkit Comparator-Kit which is a color-wheel having an accuracy of plus or minus 0.05 ppm. In 2018 the legal minimal level of free chlorine for drinking water was 0.02 ppm per report of PWSA water sampler Robert Gomez. Mike Zypinski of the PWSA Lab told the Complainant that the free chlorine concentration was

the more important number to pay attention to than the total chlorine reading based on the way our chlorination system works for Highland Park. During 2018 there were 32 days when the Complainant measured free chlorine concentrations of 0.0 ppm. On 6/12/18 in response to the Complainant calling the PWSA lab, PWSA began for the first time to open up the hydrant at the end of Bunkerhill to bring fresh water having more chlorine into the area. On 4/29/19, Section 109.710 of the Pa. Code came into effect requiring 0.2 ppm of free chlorine in drinking water throughout the distribution system. On 6/29/18 the Complainant began to test total chlorine as well as free chlorine. By 8/29/19 the hydrants at the end of Bunkerhill Street and at the end of Sheridan Avenue were being run continuously to help bring legal chlorine levels to the area. From 9/7/19 to 11/18/19, just the hydrant at the end of Bunkerhill was being run continuously. In 2019 the Complainant measured free chlorine concentrations below the legal levels on 67 days when the water was tested at his home and on 4 days when the water was tested at the hydrant at the end of Bunkerhill. Beginning in July of 2020, the hydrants at the end of Bunkerhill Street and Sheridan Avenue were flushed every couple of days to bring fresh chlorine into the main. On July 20, 2020 an automated flusher was placed on the hydrant at the end of Bunkerhill. On July 31, 2020 the automated flusher on the Bunkerhill hydrant was removed and replaced by a 4-tap manifold to which hoses could be attached to supply water to the last 3 homes on the street due to their party line being abandoned for disrepair. PWSA continued to periodically flush the Bunkerhill hydrant to bring fresh chlorine into the main even after this 4-tap manifold was installed. On 8/1/20 the Complainant began testing the water using a Lovibond MD100 Photometer which has an accuracy of plus or minus 0.05 ppm. So far in 2020 there have been 18 days when the free chlorine concentration was below the legal minimum at the Complainant's home and 8 days when the free chlorine concentration was below the legal minimum when measured at the hydrant at the end of Bunkerhill. I have heard said by PWSA employees that a possible explanation for the low chlorine concentration at the end of Bunkerhill is that the flow of water coming down Bunkerhill in the main and the water coming up to Bunkerhill from the Sheridan Avenue main are in opposing directions so the water tends to stagnate in the vicinity of the Bunkerhill hydrant when the two flows converge. PWSA water tester, Frank Davis, has stated that when the Microfiltration Plant at the Highland #1 Reservoir is completed and the Highland #1 Reservoir can be brought back in use, then the chlorine levels may be able to be boosted to a high enough level that the end of Bunkerhill will no longer have chlorine problems. PWSA employees were saying that the Microfiltration Plant would be completed in September of 2019, but the completion date kept being pushed back to the anticipated new completion date of July 22, 2020 per PWSA water sampler, Frank Davis. Frank Davis also says that the water coming down the Bunkerhill main is 3 days old before it gets there because the water is sent first to the Garfield water tower to increase water pressure. During the course of such a long 3-day travel, the water tends to lose a lot of chlorine concentration. On days when the chlorine level was tested to be illegally low by the Complainant, the Complainant would report the low measurement usually to Mike Zypinsky at the PWSA Lab or PWSA's Emergency Number. More recently in 2020, the Complainant has also been notifying Julie Quigley, Director of Administration / IT for PWSA, and Rick Obermeier, Chief of Operations for PWSA. Periodically the Complainant has also notified Zachary Shoff, Sanitarian for the DEP, of illegally low chlorine concentrations. On days when the chlorine

concentration was tested to be illegally low, the Complainant at his own expense has been purchasing clean water and ice from the grocery store to keep from possibly becoming sick.

4. PWSA has been blaming the low chlorine concentrations at the Complainant's residence on the 2-inch party line being too large to carry water to the last 3 homes on the street. PWSA claims that because the party line is so large in diameter, it holds too much water and can't be flushed out frequently enough from use to prevent the water from stagnating and chlorine concentration dissipating. Complainant's testing has shown that the low chlorine problem was not just a problem for people on the former party line, but for people who have disconnected from the party line and built their own individual line to the main, for people on Bunkerhill above the party line connection, for people at the end Sheridan Avenue, and for people at the end of Heberton Street. On 7/12/19 a sample taken at 6035 Bunkerhill (Anne Massey) had 0.0 ppm free chlorine. A sample taken at this same house on 8/14/20 had 0.08 ppm free chlorine. This is a house that connects to the main before the party line starts. On 8/24/19 a sample taken from 6045 Bunkerhill (Brook McCartney) had 0.05 ppm free chlorine. This house had disconnected from the party line and built its own individual line to the main at the time of testing. Tina Rhoades and Lyoid Steiner live at the end of Sheridan Avenue at 1376. A sample of their water revealed 0.05 ppm free chlorine on 9/29/19. A sample taken on 8/14/20 revealed 0.04 ppm free chlorine and 0.16 ppm total chlorine. Another house on the end of Sheridan at 1381 (Loth Haynes) tested for 0.025 ppm free chlorine on 9/29/19. The homes at the end of Heberton Street tested illegally low chlorine as well. The water tested at 1373 Heberton (James Acklin) on 8/14/20 showed 0.02 ppm free chlorine and 0.05 ppm total chlorine. The water tested at 1355 Heberton (Kaitlyn McLoughlin) on 8/14/20 showed 0.03 ppm free chlorine and 0.10 ppm total chlorine. Samples taken at the Bunkerhill hydrant, which is before the party line, had samplings of illegally low chlorine as previously mentioned. In 2019 there were 4 days when illegally low chlorine levels were measured at the hydrant at the end of Bunkerhill, and in 2020 there have been 8 days recorded so far when illegally low chlorine levels were measured at the hydrant at the end of Bunkerhill. The problem of illegally low chlorine concentrations appears to affecting the whole area, not just the party line.

5. PWSA does not always appear to be taking accurate chlorine concentration readings at the hydrant at the end of Bunkerhill. Per Frank Davis, water sampler for PWSA, in order to get an accurate sample of the water at the end of the Bunkerhill main which the residents are using, it is necessary to not test the water trapped in the lateral between the hydrant and the main. From Frank's calculations, it is necessary to attach a flow regulator to the hydrant which restricts flow to 20 gallons/minute and then flush the hydrant with the regulator on for 90 seconds. If the regulator is not used and the sampler opens the hydrant for several minutes before taking his sample, water with fresh chlorine is pulled down the street and does not give an accurate picture of what the chlorine level was at the end of the main where many residents are getting their water from. On Saturday, 7/18/20, Rob from PWSA was seen by the Complainant sampling water from the Bunkerhill hydrant without using the regulator. He said that weekend workers did not have access to the regulator. On Sunday, 7/19/20, Kurt from PWSA was seen by the Complainant sampling water from the hydrant at the end of Bunkerhill Street without using a regulator as well.

B. The Complainant Has Standing

The name on the water bills from PWSA is "John Musgrave". The complainant's name is "John Musgrave". The complainant did not know and to his knowledge was not informed that a "Changed of Address - Owner/Tenant Form" or "Assumption Form" was required because the PWSA bills were addressed correctly. Checks sent to pay the PWSA water bills for 6059 Bunkerhill Street are from a joint bank account bearing the names of both "Judith E. Musgrave" and "John Kerr Musgrave". Judith E. Musgrave is the mother of John Musgrave. Because John Musgrave is paying the water bills from his joint account and the bills from PWSA are addressed to his correct name, John Musgrave is legitimately the customer of record for 6059 Bunkerhill Street.

C. Reasons to Believe the Party Line is Owned by PWSA

1) For about the last 90 years the members of the party line have been paying the same infrastructure maintenance fee as those on public streets who get their water lines maintained by PWSA to their curb boxes. If PWSA is claiming that the members of the party line are responsible for maintaining the party line, then they should give the members of the party line a refund on the infrastructure maintenance fee that they have paid for the last 90 years plus interest.

2) PWSA did notify the members of the party line of a change in policy stating that we would be assuming maintenance of the party line. The first 3 breaks in the party line were repaired by PWSA, so why would the people on the party line have thought that PWSA would no longer make repairs in the future. PWSA may have told my neighbor, Dell Ziegler, of a change in policy, but nothing was told directly to the other members of the party line either verbally or in writing by PWSA. The Complainant did not designate Dell Ziegler to be his leader in the matter either. The members of the party line did not have time to prepare financially or strategically for the water line break that occurred on 1/22/18. Section 1503(b) of the Public Utility Code states that the public utility is required to personally contact the customer three days prior to a discontinuance of service in addition to a written notice of discontinuance of service. Personal contact means: (1) contacting the customer by means other than writing; or (2) contacting another person whom the customer has designated to receive a copy of any notice of discontinuation; or (3) if the customer has not made such designation, contacting a community interest group or other entity, including local police departments, which have previously agreed to receive a copy of the notice of disconnection and to attempt to contact the customer; or 4) if the customer has not made such a designation and no such community interest group or other entity has previously agreed to receive a copy of the notice of disconnection, contacting the commission or such other local government unit as the commission shall , by rule or regulation designate. PWSA did not contact the residence at 6059 Bunkerhill Street either in writing or in

person that the service of repairing our party line was being discontinued. The Complainant was informed by his neighbor, who he did not designate to be his leader, that PWSA said they would no longer be repairing his party line.

3) By PWSA making 3 repairs to the party line in about the last 13 years, PWSA has been acting as if they assumed responsibility for the party line. The last 6 houses on Bunkerhill admit they are on a private street in terms of snow plowing and paving, but this does not mean that the water line is also private.

Section 403.1 and 403.2 of PWSA's Rules and Regulations state that the Authority may grant permission to a developer to lay water lines intended to serve multiple Dwelling Units with such facilities to be dedicated to public use provided the Owner or Developer enters into a development agreement with the Authority. Provided, however, that when in the judgement of the Authority it is in the best interest of the Authority, then the Authority may accept dedication of the water and/or sewer lines to public use, provided that the Property Owner or Owners execute an agreement, in a form acceptable to the Authority, whereby an easement or right-of-way of sufficient width to protect the water and/or sewer facilities is granted, and the Authority is given the right of entrance for maintenance, inspection, operation, repair, replacement, removal and/or abandonment in place of the dedicated facilities.

The evidence from PWSA (Exhibit #1) indicates that a temporary private water line was run from Sheridan to several houses on Bunkerhill in 1929. This temporary private line may have been dedicated to public use at a later date. For 11 years PWSA repaired the party line as if they had assumed responsibility for it. This responsibility may have been granted to them in writing sometime in the past by the last 6 houses on Bunkerhill, or it may simply have developed out of precedence. It is possible to have a privately-owned street and a publicly-owned water line which appears to be our scenario.

4) There is no mention on the deed for 6059 Bunkerhill Street of any private party line. To the Complainant's knowledge, there is no mention of any private party line on the deeds of any of the other original party line members as well.

5) PWSA failed to maintain the shut off valves to the party line which were needed to be functional for a timely repair on the party line to be made. From January 22 until February 9, 2018, the shut-off valves to the party line were nonfunctional so a repair to the leaking party line was unable to be made which caused undue damage to the property at 6059 Bunkerhill Street. The leaking water caused damage to the property at 6059 Bunkerhill Street such as pushing out stones on the wall, weakening the foundation, ruining the paint in the basement, causing mold and mildew in the basement, and threatening to make the hot water heater and furnace nonfunctional. The residents of 6059 Bunkerhill had to dig a trench and install a sump pump in their yard to prevent their basement from sustaining even more serious damage. PWSA had to hire workmen to fix 2 valves that made it possible on February 9, 2018 for the water to be shut off to the party line so that repairs could be made to the break. If the party

line was private, then the shut off valves to the party line should also be private. This was not the case, however. PWSA had to make repairs to the valves that control the flow of water to the party line. If PWSA is making repairs to the valves, then they must own the valves. If PWSA owns the valves to the party line and the residents of the party line are unable to independently shut off the water to their houses, then PWSA is the one who has control of a public party line.

- 6) The evidence presented by PWSA that the water line at the end of Bunkerhill is private is a document showing that a temporary private water line was run from Sheridan to several houses on Bunkerhill in 1929 (Exhibit #1). This evidence is irrelevant, however, because the end of Bunkerhill now gets at least part of its water from another line besides this original line from Sheridan. There is 6-inch public main running down the middle of Bunkerhill Street from which the party line branches off in front of 6041 Bunkerhill.
- 7) Just because PWSA has presented evidence of a temporary private line being run from Sheridan to several houses on Bunkerhill in 1929 does not prove that this line became the permanent private line. This line may have been replaced by a permanent public line at a later date for which we have no record, or the temporary private line may have been dedicated to public use as described previously.
- 8) There is an inconsistency of information between two documents presented by PWSA showing a temporary private water line was run from Sheridan to Bunkerhill in 1929. The first document (Exhibit #1) is an "Application and Contract for Water Supply". The second document (Exhibit #2) is an "Order to Driller". These appear to be documents that go hand-in-hand because both are stamped with the same date (January 7, 1929), both have the same owner (Thomas Ward), both have the same plumber (W.W. Jones), both are for a 1.25 inch service line to be run from Sheridan to a location between North Highland and Heberton, both are for a private line, both are indexed to the same ward (11-R-6), both have the same document number (27), both are signed by the same clerk (Knox), and both indicate the water is to be used for the same number of plugs (3). One difference in information between the documents is the addresses of the property to which the water line is to be run. In Exhibit #1, "Application and Contract for Water Supply", the addresses on Bunkerhill are 6041 and 6045 though 6059. In Exhibit #2, "Order to Driller", the addresses on Bunkerhill are 6041, 6045, and 6049. A single plug normally goes to one house. If 3 plugs were ordered to be made, then one would expect 3 home addresses to be listed. The number of houses between 6045 and 6059 is 5 (6045, 6049, 6053, 6055, and 6059). It does not make sense in terms of engineering that 2 plugs would be able to supply water to 5 houses. The addresses listed on the "Application and Contract for Water Supply", may be incorrect. In Exhibit #1, "Application and Contract for Water Supply", it appears that the original addresses listed were erased (faint markings still apparent), and the new, possibly incorrect addresses written in (above and improperly spaced to the side). Exhibit #2, "Order to Driller", seems to be authentic because the order for 3 plugs corresponds the 3 addresses being listed (6041, 6045, and 6049). This being said, PWSA does not appear to have any conclusive evidence of a private water line being run to 6053, 6055, or 6059 Bunkerhill. Section 3308 of the Public Utility Code states that destroying records can be

punished by fines and/or imprisonment. PWSA appears to have altered a document which they used to their advantage in determining the private versus public nature of the water line in question.

9) On September 22, 1952 the City of Pittsburgh Department of Public works, through legislative action of Pittsburgh City Counsel, passed Ordinance #339, which vacated land on the steep, sloping bank that borders the current Bunkerhill Street, from Heberton Street to Sheridan Avenue. This vacation had no bearing on the party line which runs about 10 feet from the edge of the back of the homes. The vacation also had no bearing on the drivable portion of the street. In short, the vacation had no bearing on the determination of the private versus public nature of the water line in question.

D. Requested Relief

1. The Complainant's residence at 6059 Bunkerhill Street, Pittsburgh, Pennsylvania 15206 has its own curb stop approximately 10 feet to the side of the house. PWSA Tariff Water – P.U.C. No. 1, Part III, Section B.13.a. stipulates that Residential Property Owners whose properties are served by a Party Water Service Line must install separate service lines to each individual property. Each customer shall have an individual Water Service Line and Meter of a size, type, location, and setting approved by the Authority. The cost of installation of the Water Service Line from the residence to the Curb Stop is the responsibility of the property Owner. Installation and the cost of installation of the Water Service Line from the Water Main to and including the Curb Stop is the responsibility of the Authority. Only the tapping fee (under Part III, Section G.2. of the Tariff regulating Line Extensions) will be imposed. All plans for installation of the Water Service Lines and the scheduling of such work is subject to the permitting process and the prior approval of the Authority.

2. PWSA Tariff Water – P.U.C. No.1, Part III, Section B.11 stipulates the rules of Connection to Authority's Mains. No connection shall be made to the Authority's main, nor detachment from it, except under the direction and control of the Authority. All such connections shall be the property of the Authority as shall be accessible to it and under its control. The Authority will furnish, install and maintain all service lines from the main to and including the curb stop and box.

3. Section 1501 of the Public Utility Code states that every public utility needs to provide adequate, efficient, safe and reasonable service and facilities. The public utility is required to make all repairs, changes, extensions, and improvements to their service and facilities necessary for the convenience and safety of its customers. In addition, service needs to be without unreasonable interruptions.

4. Section 1353 of the Public Utility Code gives the PUC the authority to establish a distribution system improvement charge to provide timely recovery of the costs incurred to repair, improve, and replace eligible property in order to ensure efficient, safe, reliable and

reasonable service. Section 1351(3) lists as eligible property (ii) Mains and valves installed as replacements for existing facilities that have worn out, are in deteriorated condition, or are required to be upgraded to meet under 52 Pa. Code Chapter 65 (relating to water service) and (iii) Main extensions installed to eliminate dead ends and to implement solutions to regional water supply problems that present a significant health and safety concern for customers currently receiving service from the water utility.

E. Summary

The water lines to the end of Bunkerhill Street have reached a critical juncture in their history. The 6-inch main running down Bunkerhill has broken 7 times in the last 10 months within the same 150 foot stretch between 6020 and 6031. There are rumors that this 6-inch main will be replaced down to the hydrant at the end of Bunkerhill this October. The party line that used to supply water to the last 6 homes on the street has had to be abandoned due to deterioration beyond repair. The last 3 houses on Bunkerhill are now being supplied water from hoses hooked up to the hydrant. With winter approaching, there is a limited window of time to build new water lines to these 3 homes before their hoses freeze. These 3 homes are waiting for PWSA Engineering to complete their plans so construction can begin. There appears to be no conclusive proof that the party line that used to supply these 3 homes was private; and if fact, there appears to be many reasons to believe the old party line was public. PWSA is claiming that the Microfiltration Plant at Highland #1 Reservoir has recently been completed and put in use which may enable PWSA to boost chlorine levels to legal levels for the end of Bunkerhill. Over the past 2 weeks from 8/14/20 to 8/28/20, there have been 4 days when illegally low chlorine levels were measured at the hydrant at the end of Bunkerhill Street, 6 days when illegally low chlorine levels were measured at the residence at 6059 Bunkerhill, and illegally low chlorine levels measured at 6035 Bunkerhill, 1376 Sheridan, 1373 Heberton, and 1355 Heberton. It appears inconclusive at this time as to whether PWSA will be able to boost chlorine levels to legal levels in the area on a consistent basis with their new equipment. With the street opened up for the replacement of the 6-inch main supposedly slated for this October, it appears to be the opportune time for PWSA to implement a plan to bring new water lines to the homes at the end of Bunkerhill Street in a manner that will enable them to have adequate chlorine on a consistent basis. This plan ideally would allow legal levels of chlorine to be delivered to the residents at the bottom of Heberton and Sheridan on a consistent basis as well.

CONCLUSION

WHEREFORE, the Complainant respectfully requests that the commission (a) hear the complaint; and (b) grant any other relief deemed appropriate.

Respectfully submitted,

John K. Musgrave IV

John K. Musgrave IV
6059 Bunkerhill Street
Pittsburgh, Pennsylvania 15206
(412)853-1666
jmusky@earthlink.net

Date: August 29, 2020

Pro Se Complainant

(EXHIBIT #1)

Form P-160 10-28

CITY OF PITTSBURGH
DEPARTMENT OF PUBLIC WORKS
BUREAU OF WATER

APPLICATION AND CONTRACT FOR WATER SUPPLY

INDEX _____

WARD 11-1-4

SERVICE RECORD BOOK NUMBER 2
STREET: Bunker Hill St SIDE: E

PROPERTY 6041-45-59

BETWEEN N. Big Island

AND Hickman

SERVICE 1 1/4

INCH

CORPORATION COOK

INCH

ON

Shendar Park

PT.

W

V

FT.

W

V

HOUSES Two

: SINKS

: WASH STANDBY IN TUB

BATHS One

: CLOSETS, INSIDE

: CLOSETS, OUTSIDE

H. W. BOILERS None

: STEAM BOILERS

: WASH RAVES

OTHER PURPOSES Temporary

APPLICATION IS HEREBY MADE FOR SUPPLY OF WATER AS ABOVE DESCRIBED--SUBJECT TO ALL LAWS, ORDINANCES, RULES, REGULATIONS AND RESOLUTIONS NOW IN FORCE, OR WHICH MAY BE ENACTED LATER, GOVERNING THE USE OF WATER IN THE CITY OF PITTSBURGH; AND, FOR AND IN CONSIDERATION OF THE GRANTING OF SAID SUPPLY OF WATER, IT IS AGREED THAT EXCAVATION TO THE MAIN LINES OR LINE WILL BE MADE BY APPLICANTS, WHO SHALL REMOVE (AT THE TIME SAID SUPPLY IS CONNECTED) ALL OTHER WATER SERVICES LEADING TO THE PROPERTY NAMED HEREIN.

WITNESS:

DATED

192

Walter M. George

Name of Owner
Walter M. George
NUMBER

DEC 31 1920

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AUG 29 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

(EXHIBIT #2)

CITY OF PITTSBURGH
DEPARTMENT OF PUBLIC WORKS
BUREAU OF WATER

Number 17
DISTRIBUTION DIVISION

ORDER TO DRILLER:

INDEX R-6

DATE 1/1/65

DRILLER CORPORATION MAIN SERVICE LEAD

PREMises 5041-4549 Bunker Hill Bldg CHEN

M. H. Hagan and J. L. Foster

DRILL ON Durgan DATE

OWNER A. H. Wood

PLUMBER J. L. Jones

REMARKS Private Driveway

CONTRACT CLERK

REPORT OF DRILLER: DATE 1/1/65

DRILLED AS ORDERED CORPORATION MAIN SERVICE

ON N. SIDE OF ST. FT. FROM

AND FT. FROM NW 242

SYSTEM MAIN DEPTH FT. FROM PT.

PIPE BOX OPRB COOK FT. FROM PT.

SERVICE SUPPLIES

REMARKS:

I hereby certify that the service pipe of required standard was properly laid, and that stopper and box of required standard were properly set in place before corporation cock was inserted.

DRILLER

CONTRACT CLERK

BRAUGHTSMAN

CHECKED AND ENTERED

RECEIVED

AUG 29 2020

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the foregoing document upon the persons and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code Section 1.54.

Dated this 29th day of August, 2020

John K. Musgrave IV

John K. Musgrave IV

Pro Se Complainant John K. Musgrave IV agrees to serve as Pro Se counsel for himself:

John K. Musgrave IV
6059 Bunkerhill Street
Pittsburgh, PA 15206
(412)853-1666
jmusky@earthlink.net

Service by certified mail addressed as follows: Service by certified mail addressed as follows:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Of counsel for
Pittsburgh Water and Sewer Authority
Lauren M. Burge, Esquire
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219

Service by certified mail addressed as follows:

Of counsel for
Pittsburgh Water and Sewer Authority
Shannon F. Barkley, Esquire
Penn Liberty Plaza I
1200 Penn Avenue
Pittsburgh, PA 15222

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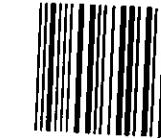
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