|  |  |  |
| --- | --- | --- |
| PUC logo | COMMONWEALTH OF PENNSYLVANIA  PENNSYLVANIA PUBLIC UTILITY COMMISSION  400 NORTH STREET, HARRISBURG, PA 17120 | **IN REPLY PLEASE REFER TO OUR FILE** |

April 21, 2021

Docket No. R-2021-3024779

Utility Code 2423775

DEANNE M ODELL ESQUIRE

ECKERT SEAMANS CHERIN & MELLOTT LLC

213 MARKET STREET 8TH FLOOR

HARRISBURG PA 17101

[DODELL@ECKETSEAMANS.COM](mailto:DODELL@ECKETSEAMANS.COM)

RE: The Pittsburgh Water and Sewer Authority – Stormwater Division Tariff Storm Water – Pa. P.U.C. No. 1 at Docket No. R-2021-3024779

Dear Attorney O’Dell:

On April 13, 2021, The Pittsburgh Water and Sewer Authority – Stormwater Division (PWSA-SD) filed the above-captioned document with the Public Utility Commission. For the Commission to complete its analysis of the filing, responses are required for the attached data requests. Please forward the requested information to the Commission within 10 business days of the date of this letter.

During the pendency of the current Proclamation of Disaster Emergency, the Commission shall only accept e-filings in lieu of paper filings for all documents. Please e-file your responses at <http://www.puc.pa.gov/efiling/default.aspx>. A list of allowable e-filing document types is available at <http://www.puc.pa.gov/efiling/DocTypes.aspx>. All filings containing confidential or proprietary information shall be filed with the Commission by e-mailing the Secretary at [rchiavetta@pa.gov](mailto:rchiavetta@pa.gov). Use of encryption with the prior consent of the Secretary is permitted. All documents requiring notary stamps must have original signatures.

**Please note that your answers must be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

*I,* [print name of appropriate company representative], *hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).*

Signature \_\_\_\_\_\_\_\_

Title \_\_\_\_\_\_\_\_\_\_\_\_

Date \_\_\_\_\_\_\_\_\_\_\_\_

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite review of the filing, please send a copy of the information to Paul Zander via e-mail at[**pzander@pa.gov**](mailto:pzander@pa.gov). Questions may be directed to Paul Zander in the Bureau of Technical Utility Services, Water/Wastewater Division at telephone number (717) 783-1372. Thank you in advance for your cooperation.

Sincerely,

Rosemary Chiavetta

Secretary

Enclosure – TUS Data Request Set 1

cc: Tanya McCloskey, Office of Consumer Advocate (w/enclosure), [tmccloskey@paoca.gov](mailto:tmccloskey@paoca.gov)

John Evans, Office of Small Business Advocate (w/enclosure), [jorevan@pa.gov](mailto:jorevan@pa.gov)

Richard Kanaskie, PUC I&E (w/enclosure), [rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

1. PWSA-SD’s response to 52 Pa.Code § 53.53, Exhibit D, Filing Requirement I.2 does not appear to provide a distinct summary of income statement information for stormwater service rendered by PWSA-SD. For example, PWSA-SD’s response includes two lines titled “Sale for Resale & Contract Sales” and “Other Revenues” where revenues are not specifically attributed to a type of utility service rendered by PWSA-SD. Also, income statement information does not appear to be provided for each rate increase proposed under Tariff Storm Water – Pa. P.U.C. No. 1. For example, PWSA-SD’s response appears to only reflect income statement data associated with rates effective January 12, 2023 and does not appear to reflect income statement data associated with rates effective January 12, 2022. Please prepare an income statement for each test year included in the rate proceeding, including only information attributable to stormwater service rendered by PWSA-SD. This summary must exclude income statement information associated with other types of utility services, must separately identify non-operating revenues associated with stormwater service, and must include the following information:
   1. Col. 1 - Book recorded income statement for the test year;
   2. Col. 2 - Adjustments to Col. 1 to annualize and normalize under present rates;
   3. Col. 3 - Income statement under present rates after adjustments in Col. 2;
   4. Col. 4 – Adjustments to Col. 3 for proposed rates effective January 12, 2022;
   5. Col. 5 – Income statement under proposed rates effective January 12, 2022;
   6. Col. 6 – Adjustments to Col. 5 for proposed rates effective January 12, 2023; and
   7. Col. 7 – Income statement under proposed rates effective January 12, 2023.