

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\_oca

 /pennoca

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

April 30, 2021

**Via Electronic Mail Only**

Deanne O'Dell, Esquire  
Daniel Clearfield, Esquire  
Karen O. Moury, Esquire  
Eckert, Seamans, Cherin, & Mellott, LLC  
213 Market Street  
8th Floor  
Harrisburg, PA 17101

Re: Pennsylvania Public Utility Commission

v.

Pittsburgh Water and Sewer Authority  
Docket Nos. R-2021-3024773 (Water)  
C-2021-3025473 (Water)  
R-2021-3024774 (Wastewater)  
C-2021-3025471 (Wastewater)  
R-2021-3024779 (Stormwater)  
C-2021-3025474 (Stormwater)

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set II and Set III, in the above-referenced proceedings.

In accordance with the Commission's Rules of Practice and Procedure, we request that PWSA provide verified answers to these inquiries within 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 consultants, as listed below:

Dante Mugrace  
PCMG and Associates  
90 Moonlight Court  
Toms River, NJ 08753  
E-Mail: [OCAPWSA2021@paoca.org](mailto:OCAPWSA2021@paoca.org)

Barbara R. Alexander  
Barbara Alexander Consulting, LLC  
83 Wedgewood Drive  
Winthrop, Maine 04364  
E-Mail: [OCAPWSA2021@paoca.org](mailto:OCAPWSA2021@paoca.org)

Deanne O'Dell, Esquire  
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April 30, 2021  
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).

Sincerely,

/s/ Lauren E. Guerra  
Lauren E. Guerra  
Assistant Consumer Advocate  
PA Attorney I.D. # 323192  
E-Mail: [LGuerra@paoca.org](mailto:LGuerra@paoca.org)

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service only)  
Certificate of Service

\*307968

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission : Docket Nos. R-2021-3024773 (Water)  
: C-2021-3025473 (Water)  
v. : R-2021-3024774 (Wastewater)  
: C-2021-3025471 (Wastewater)  
: R-2021-3024779 (Stormwater)  
Pittsburgh Water and Sewer Authority : C-2021-3025474 (Stormwater)

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Interrogatories to Pittsburgh Water and Sewer Authority (PWSA), Set II and Set III, 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 30<sup>th</sup> day of April 2021.

**SERVICE BY E-MAIL ONLY**

Gina L. Miller, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

Erin K. Fure, Esquire  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

Deanne M. O'Dell, Esquire  
Daniel Clearfield, Esquire  
Karen O. Moury, Esquire  
Eckert, Seamans, Cherin, & Mellott, LLC  
213 Market Street  
8<sup>th</sup> Floor  
Harrisburg, PA 17101

Ria M. Pereira, Esquire  
Elizabeth R. Marx, Esquire  
John W. Sweet, Esquire  
Lauren N. Berman, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

/s/ Lauren E. Guerra  
Lauren E. Guerra  
Assistant Consumer Advocate  
PA Attorney I.D. # 323192  
E-Mail: [LGuerra@paoca.org](mailto:LGuerra@paoca.org)

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

Luis M. Melendez  
Assistant Consumer Advocate  
PA Attorney I.D. # 329512  
E-Mail: [LMelendez@paoca.org](mailto:LMelendez@paoca.org)

Counsel for:  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
Phone: (717) 783-5048  
Fax: (717) 783-7152  
Dated: April 30, 2021  
\*307963

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