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May 3, 2021

Via Electronic Filing

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

Re: Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority
Docket Nos. R-2021-3024774 (wastewater)

Dear Secretary:

Enclosed for electronic filing please find the Pittsburgh Water and Sewer Authority's ("PWSA") Responses to the Bureau of Technical Utility Services ("TUS") Interrogatories, Set I, in the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell, Esq.

DMO/lww
Enclosure

cc: Certificate of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PWSA's Responses to TUS Interrogatories, Set I upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

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May 3, 2021

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
to the Interrogatories of the Bureau of Technical Utility Services (“TUS”), Set I in
Docket No. R-2021-3024774 (wastewater)**

Request: TUS-I-1 PWSA-WD’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 wastewater service rendered by PWSA-WD. For example, PWSA-WD’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-WD. Also, income statement information does not appear to be provided for each rate increase proposed under Supplement No. 6 Tariff Wastewater – Pa. P.U.C. No. 1 (Supplement No. 6). For example, PWSA-WD’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 wastewater service rendered by PWSA-WD. This summary must exclude income statement information associated with other types of utility services, must separately identify non-operating revenues associated with wastewater service, and must include the following information:

- a. Col. 1 - Book recorded income statement for the test year;
- b. Col. 2 - Adjustments to Col. 1 to annualize and normalize under present rates;
- c. Col. 3 - Income statement under present rates after adjustments in Col. 2;
- d. Col. 4 – Adjustments to Col. 3 for proposed rates effective January 12, 2022;
- e. Col. 5 – Income statement under proposed rates effective January 12, 2022;
- f. Col. 6 – Adjustments to Col. 5 for proposed rates effective January 12, 2023; and
- g. Col. 7 – Income statement under proposed rates effective January 12, 2023.

Response: See enclosed schedule labelled as HJS-16WW-TUS-1.

Response Provided by: Harold J. Smith, Vice President, Raftelis Financial Consultants
Consultant to The Pittsburgh Water and Sewer Authority

Dated: May 3, 2021

	2022 Revenue @ Existing Rates			2022 Revenue @ Proposed Rates			2023 Revenue @ Proposed Rates		
	Units	Rates	Revenue	Units	Rates	Revenue	Units	Rates	Revenue
Base Rate Revenues									
<u>Minimum Charges</u>									
Residential									
5/8"	958,530	\$ 8.51	\$ 8,157,086	958,530	\$ 8.06	\$ 7,725,748	958,530	\$ 7.61	\$ 7,294,410
3/4"	30,942	17.23	533,125	30,942	14.70	454,843	30,942	12.16	376,251
1"	28,830	40.92	1,179,728	28,830	33.07	953,412	28,830	25.22	727,095
1 1/2"	84	84.51	7,099	84	66.24	5,564	84	47.97	4,029
2"	26	143.07	3,720	26	111.16	2,890	26	79.24	2,060
Unmetered	4,132	31.43	129,869	4,132	29.03	119,952	4,132	26.63	110,035
<i>Subtotal: Residential</i>	1,022,543		\$ 10,010,627	1,022,543		\$ 9,262,409	1,022,543		\$ 8,513,881
Residential - CAP-BDP									
5/8"	68,003	\$ -	\$ -	68,003	\$ -	\$ -	68,003	\$ -	\$ -
3/4"	451	-	-	451	-	-	451	-	-
1"	218	-	-	218	-	-	218	-	-
Unmetered	12	22.92	275	12	20.97	252	12	19.02	228
<i>Subtotal: Residential - CAP-BDP</i>	68,684		\$ 275	68,684		\$ 252	68,684		\$ 228
Commercial									
5/8"	43,473	\$ 8.51	\$ 369,952	43,473	\$ 8.06	\$ 350,390	43,473	\$ 7.61	\$ 330,827
3/4"	9,306	17.23	160,337	9,306	14.70	136,793	9,306	12.16	113,157
1"	18,776	40.92	768,314	18,776	33.07	620,922	18,776	25.22	473,531
1 1/2"	10,599	84.51	895,721	10,599	66.24	702,078	10,599	47.97	508,434
2"	10,558	143.07	1,510,485	10,558	111.16	1,173,590	10,558	79.24	836,590
3"	2,890	326.33	943,094	2,890	253.04	731,286	2,890	179.74	519,449
4"	2,410	558.31	1,345,713	2,410	433.71	1,045,386	2,410	309.11	745,058
6"	1,210	1,338.15	1,619,162	1,210	1,046.14	1,265,829	1,210	754.13	912,497
8"	112	2,424.04	272,300	112	1,903.55	213,832	112	1,383.05	155,363
10" & Above	62	3,991.08	247,447	62	3,148.83	195,227	62	2,306.57	143,007
Unmetered	24	35.47	851	24	32.98	792	24	30.49	732
<i>Subtotal: Commercial</i>	99,420		\$ 8,133,377	99,420		\$ 6,436,125	99,420		\$ 4,738,644
Industrial									
5/8"	199	\$ 8.51	\$ 1,691	199	\$ 8.06	\$ 1,601	199	\$ 7.61	\$ 1,512
3/4"	112	17.23	1,924	112	14.70	1,642	112	12.16	1,358
1"	245	40.92	10,025	245	33.07	8,102	245	25.22	6,179
1 1/2"	52	84.51	4,423	52	66.24	3,467	52	47.97	2,510
2"	161	143.07	23,082	161	111.16	17,934	161	79.24	12,784
3"	24	326.33	7,832	24	253.04	6,073	24	179.74	4,314
4"	102	558.31	56,948	102	433.71	44,238	102	309.11	31,529
6"	23	1,338.15	31,224	23	1,046.14	24,410	23	754.13	17,596
8"	40	2,424.04	96,962	40	1,903.55	76,142	40	1,383.05	55,322
10" & Above	24	3,991.08	95,786	24	3,148.83	75,572	24	2,306.57	55,358
<i>Subtotal: Industrial</i>	982		\$ 329,895	982		\$ 259,181	982		\$ 188,462
Health or Education									
5/8"	409	\$ 8.51	\$ 3,478	409	\$ 8.06	\$ 3,294	409	\$ 7.61	\$ 3,110
3/4"	102	17.23	1,752	102	14.70	1,495	102	12.16	1,236
1"	293	40.92	11,976	293	33.07	9,678	293	25.22	7,381
1 1/2"	774	84.51	65,383	774	66.24	51,248	774	47.97	37,113
2"	1,736	143.07	248,370	1,736	111.16	192,974	1,736	79.24	137,561
3"	1,160	326.33	378,543	1,160	253.04	293,526	1,160	179.74	208,498
4"	835	558.31	466,003	835	433.71	362,003	835	309.11	258,004
6"	441	1,338.15	590,124	441	1,046.14	461,348	441	754.13	332,571
8"	36	2,424.04	87,265	36	1,903.55	68,528	36	1,383.05	49,790
10" & Above	24	3,991.08	95,786	24	3,148.83	75,572	24	2,306.57	55,358
<i>Subtotal: Health or Education</i>	5,808		\$ 1,948,679	5,808		\$ 1,519,665	5,808		\$ 1,090,622
Municipal									
5/8"	1,786	\$ 5.11	\$ 9,119	1,786	\$ 4.84	\$ 8,637	1,786	\$ 6.09	\$ 10,873
3/4"	134	10.34	1,385	134	8.82	1,182	134	9.73	1,304
1"	385	24.55	9,453	385	19.84	7,639	385	20.18	7,768
1 1/2"	335	50.71	16,987	335	39.74	13,314	335	38.38	12,856
2"	432	85.84	37,084	432	66.70	28,813	432	63.39	27,385
3"	133	195.80	26,041	133	151.82	20,193	133	143.79	19,124
4"	35	334.99	11,725	35	260.23	9,108	35	247.29	8,655
6"	48	802.89	38,539	48	627.68	30,129	48	603.30	28,959
8"	-	1,454.42	-	-	1,142.13	-	-	1,106.44	-
10" & Above	-	2,394.65	-	-	1,889.30	-	-	1,845.26	-
<i>Subtotal: Municipal</i>	3,288		\$ 150,332	3,288		\$ 119,014	3,288		\$ 116,924
Municipal - Unmetered									
EMS / Fire / Police Station	108	\$ -	\$ -	108	\$ -	\$ -	108	\$ -	\$ -
Public Park or Playground	468	-	-	468	-	-	468	-	-
Swimming Pool	120	-	-	120	-	-	120	-	-
Municipal Building	48	-	-	48	-	-	48	-	-
Municipal Garage	48	-	-	48	-	-	48	-	-
Rec Center	24	-	-	24	-	-	24	-	-
Other	132	-	-	132	-	-	132	-	-
<i>Subtotal: Municipal - Unmetered</i>	948		\$ -	948		\$ -	948		\$ -
<i>Subtotal: Minimum Charges</i>			\$ 20,573,185			\$ 17,596,646			\$ 14,648,761

	2022 Revenue @ Existing Rates			2022 Revenue @ Proposed Rates			2023 Revenue @ Proposed Rates		
	Units	Rates	Revenue	Units	Rates	Revenue	Units	Rates	Revenue
Volume Charge									
Residential	2,518,813	\$ 7.64	\$ 19,243,735	2,518,813	\$ 6.99	\$ 17,606,506	2,518,813	\$ 6.34	\$ 15,969,277
Residential - CAP-BDP - Tier 1	186,246	7.64	1,422,916	186,246	6.99	1,301,856	186,246	6.34	1,180,797
Residential - CAP-BDP - Tier 2	11,888	6.11	72,660	11,888	3.50	41,549	11,888	3.17	37,685
Commercial	2,698,622	6.74	18,188,710	2,698,622	6.23	16,812,413	2,698,622	5.72	15,436,116
Industrial	191,255	6.15	1,176,221	191,255	5.74	1,097,807	191,255	5.32	1,017,479
Health or Education	958,980	8.44	8,093,795	958,980	7.24	6,943,019	958,980	6.03	5,782,652
Municipal	193,013	4.04	780,546	193,013	3.74	721,484	193,013	4.58	883,229
<i>Subtotal: Volume Charge</i>	<u>6,758,818</u>		<u>\$ 48,978,582</u>			<u>\$ 44,524,633</u>	<u>6,758,818</u>		<u>\$ 40,307,235</u>
Wholesale and Contract Revenues			\$ -			\$ -			\$ -
Total: Base Rate Revenues			\$ 69,551,767			\$ 62,121,278			\$ 54,955,996
DSIC Revenues									
Residential			1,462,718			\$ 1,343,446			\$ 1,224,158
Residential - CAP-BDP			74,793			65,105			60,935
Commercial			1,316,104			1,162,427			1,008,738
Industrial			75,306			67,849			60,297
Health or Education			502,124			423,134			343,664
Municipal			46,544			42,025			50,008
Total: DSIC Revenues			\$ 3,477,588			\$ 3,103,986			\$ 2,747,800
Other Revenues									
Other Revenues			673,250			673,250			673,250
Total: System Revenues			\$ 73,702,605			\$ 65,898,515			\$ 58,377,045

VERIFICATION

I, Harold J. Smith, hereby state that: (1) I am a Vice President of Raftelis Financial Consultants, Inc.; (2) I have been retained by The Pittsburgh Water and Sewer Authority (“PWSA”) and am authority to present testimony on its behalf; (3) the responses to discovery that have been sponsored by me are true and correct (or are true and correct to the best of my knowledge, information and belief); and, (4) 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).

Dated: April 30, 2021



Harold J. Smith, Vice President
Raftelis Financial Consultants

Consultant to:
The Pittsburgh Water and Sewer Authority