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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-2021-3024779 (stormwater)

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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Deanne M. O'Dell, Esq.

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-2021-3024779 (stormwater)**

Request: TUS-I-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

- 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: Please see enclosed schedule labelled as HJS-8SW-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 Revenue									
<u>Non-Stormwater Only</u>									
Residential									
Tier 1	12,669		\$ -	12,669	\$ 2.99	\$ 454,564	12,669	\$ 3.98	\$ 605,071
Tier 2	57,273		-	57,273	5.96	4,096,165	57,273	7.95	5,463,844
Tier 3	13,504		-	13,504	11.93	1,933,233	13,504	15.90	2,576,563
Other	10,145		-	10,145	5.96	725,570	10,145	7.95	967,833
<i>Subtotal: Residential</i>	93,591		\$ -	93,591		\$ 7,209,532	93,591		\$ 9,613,312
Residential - CAP									
Tier 1	631		\$ -	631	\$ 0.74	\$ 5,603	631	\$ 0.99	\$ 7,496
Tier 2	2,636		-	2,636	1.49	47,132	2,636	1.99	62,948
Tier 3	299		-	299	2.99	10,728	299	3.98	14,280
Other	142		-	142	5.96	10,156	142	1.99	3,391
<i>Subtotal: Residential - CAP</i>	3,708		\$ -	3,708		\$ 73,619	3,708		\$ 88,115
Non-Residential									
Commercial	85,560		\$ -	85,560	\$ 5.96	\$ 6,119,249	85,560	\$ 7.95	\$ 8,162,421
Industrial	1,568		-	1,568	5.96	112,109	1,568	7.95	149,541
Health or Education	11,739		-	11,739	5.96	839,598	11,739	7.95	1,119,933
Municipal	5,784		-	5,784	5.96	413,692	5,784	7.95	551,821
Other	11,588		-	11,588	5.96	828,807	11,588	7.95	1,105,539
<i>Subtotal: Non-Residential</i>	116,240		\$ -			\$ 8,313,454	116,240		\$ 11,089,255
<i>Subtotal: Non-Stormwater Only</i>			\$ -			\$ 15,596,605			\$ 20,790,682
<u>Stormwater Only</u>									
Residential - SW Only									
Tier 1	305		\$ -	305	\$ 2.99	\$ 10,943	305	\$ 3.98	\$ 14,567
Tier 2	561		-	561	5.96	40,123	561	7.95	53,519
Tier 3	138		-	138	11.93	19,756	138	15.90	26,330
Other	1		-	1	5.96	72	1	7.95	95
<i>Subtotal: Residential - SW Only</i>	1,005		\$ -	1,005		\$ 70,894	1,005		\$ 94,512
Non-Residential	29,816			29,816	5.96	2,132,440	29,816	7.95	2,844,446
<i>Subtotal: Stormwater Only</i>			\$ -			\$ 2,203,334			\$ 2,938,958
Stormwater User Charge Revenue			\$ -			\$ 17,799,939			\$ 23,729,641
DSIC Revenues									
Residential			\$ -			\$ -			\$ -
Non-Residential			-			-			-
<i>Subtotal: DSIC Revenues</i>			\$ -			\$ -			\$ -
Other Revenues									
Other Revenues			570,821			570,821			570,821
Total: System Revenues			\$ 570,821			\$ 18,370,760			\$ 24,300,462

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