COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE 555 Walnut Street, 5th Floor, Forum Place Harrisburg, Pennsylvania 17101-1923 (717) 783-5048 800-684-6560

May 12, 2021



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

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 V and Set VI, 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:

Scott J. Rubin 333 Oak Lane Bloomsburg, PA 17815 E-Mail: <u>OCAPWSA2021@paoca.org</u> David S. Habr Habr Economics 213 Cornuta Way Nipomo, CA 93444-5020 E-Mail: <u>OCAPWSA2021@paoca.org</u> Deanne O'Dell, Esquire Daniel Clearfield, Esquire Karen O. Moury, Esquire May 12, 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).

Very truly yours,

<u>/s/ Christine Maloni Hoover</u> Christine Maloni Hoover Senior Assistant Consumer Advocate PA Attorney I.D. # 50026 E-Mail: <u>CHoover@paoca.org</u>

Enclosures:

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

*308550

CERTIFICATE OF SERVICE

Re:	Pennsylvania Public Utility Commission	: Docket Nos	s. 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 V and Set VI, 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 12th day of May 2021.

SERVICE BY E-MAIL ONLY

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

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

<u>/s/ Christine Maloni Hoover</u> Christine Maloni Hoover Senior Assistant Consumer Advocate PA Attorney I.D. # 50026 E-Mail: <u>CHoover@paoca.org</u>

Luis M. Melendez Assistant Consumer Advocate PA Attorney I.D. # 329512 E-Mail: <u>LMelendez@paoca.org</u>

Lauren E. Guerra Assistant Consumer Advocate PA Attorney I.D. # 323192 E-Mail: <u>LGuerra@paoca.org</u> Erin K. Fure, Esquire Office of Small Business Advocate 555 Walnut Street 1st Floor, Forum Place Harrisburg, PA 17101-1923

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

Erin L. Gannon Senior Assistant Consumer Advocate PA Attorney I.D. # 83487 E-Mail: <u>EGannon@paoca.org</u>

Counsel for: Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 Phone: (717) 783-5048 Fax: (717) 783-7152 Dated: May 12, 2021 *308548