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May 17, 2021

Via Electronic Filing

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

Re: Pittsburgh Water and Sewer Authority 2021 Rate Filing;
Docket Nos. R-2021-3024773 (water), R-2021-3024774 (wastewater);
R-2021-3024779 (stormwater)

Dear Secretary Chiavetta:

On behalf of the Pittsburg Water and Sewer Authority ("PWSA") attached please find its **Responses to the April 30, 2021 Questions from Commissioner Ralph V. Yanora.**

Please note that the discovery responses are available at ESCM Share File site. To receive access, please contact Deanne O'Dell (dodell@eckertseamans.com) or 717-255-3744 and provide the name and email address of the person seeking access.

Sincerely,

A handwritten signature in blue ink that reads "Deanne M. O'Dell".

Deanne M. O'Dell

DMO/lww

cc: Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of **PWSA's Responses to Commissioner Yanora's Questions** 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 17, 2021

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
to the April 30, 2021 Questions from Commissioner Ralph V. Yanora in
Docket Nos. R-2021-3024773 (water); R-2021-3024774 (wastewater)
and R-2021-3024779 (stormwater)**

Request: Commissioner Yanora -I-1 Compliance of the PWSA tariff cross-connection control requirements with 25 Pa. Code §§ 109.709, 109.609 and any applicable provisions of the International Plumbing Code.

Response: PWSA’s Tariff is in compliance with 25 Pa. Code 109.709 & 109.609. Below is the section from the PWSA Tariff. We also follow the ACHD Plumbing Code Article XV which was adopted by the ICC Plumbing Code. All storage reservoirs and tanks are covered with the exception of the Highland 1 Reservoir. Water from the Highland 1 Reservoir is disconnected from the distribution system and retreated via a membrane filtration plant prior to pumping back into the system.

6. Water Service Connections and Appurtenances: All Customers' services require separate Water Service Line connections, approved Meter and Backflow prevention devices for domestic water services, and a double detector check valve with a by-pass Meter for fire protection systems if fire protection systems are required by applicable building codes and/or are indicated on the application. The Authority requires the installation of stop and waste valves and check valves on all new or reconstructed customer service lines. The responsibility for the proper installation and maintenance of such valves shall be the customer's and at the customer's sole expense. Additional specifications for service connections are provided in the Authority's Procedures Manual for Developers.
7. Backflow Prevention Device: The installation of a Backflow device of the type approved by the Authority is required if, in the Authority's opinion, such a device is needed to protect the integrity of the Authority's system. The Backflow prevention device shall be installed, owned, tested, and maintained by the customer at the customer's expense. The location of the backflow prevention device shall be approved by the Authority. The Authority requires the installation of approved double check valves for service lines providing service to residential units.

Response Provided by: Barry King, PE, Director of Engineering
Rick Obermeier, Chief of Operations
Sarah Bolenbaugh, PE, Senior Group Manager, Water Programs
The Pittsburgh Water and Sewer Authority

Dated: May 17, 2021

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
to the April 30, 2021 Questions from Commissioner Ralph V. Yanora in
Docket Nos. R-2021-3024773 (water); R-2021-3024774 (wastewater)
and R-2021-3024779 (stormwater)**

Request: Commissioner Yanora -I-2 Compliance materials of the operation and maintenance plans required by 25 Pa. Code §109.702 as they relate to adequate, safe, and reasonable service for utility customers and employees.

Response: PWSA has implemented an Environmental Compliance Manual for Water Production (April 9, 2021), which identifies 25 PA Code § 109.702 Operation and Maintenance Plan as a compliance obligation. This obligation is currently being achieved through several different documents as outlined below. PWSA is also planning to update and consolidate the Operations and Maintenance Plan consistent with the requirements of 25 PA Code § 109.702. This activity is being tracked by our Environmental Compliance Director and is scheduled for completion by the end of Q1 2022 in conjunction with a broader update to the Environmental Compliance Manual. Identified improvements include formalization and updates to standard procedures and utilization of technology to increase efficiency and documentation of O&M and compliance related obligations.

The current Operation and Maintenance Plan documents include:

- Environmental Compliance Manual for Water Production: Description of the facilities, records and reporting, staffing and training.
- Standard Operating Procedures: Maintained by Operations, Compliance, and Laboratory for activities performed within each group. SOPs for Operations include startup and shutdown requirements.
- Manufacturer’s Manual: Hard copy and electronic O&M manuals are turned over to operation as part of capital improvements projects and maintained at the water treatment plant
- Emergency Plan and Operating Procedures: Safety and Security maintains four related plans 1) Risk and Resilience Assessment 2) Emergency Action Plan 3) Business Continuity Plan 4) Physical Security Plan
- Sampling and Analyses: Laboratory and Compliance maintains procedures for sampling, analysis, and quality control for system monitoring and regulatory reporting
- Public Notification Elements: Compliance is responsible for public notification process.
- Routine maintenance activities: Operations performs routine maintenance activities

Response Provided by: Barry King, PE, Director of Engineering
Frank Sidari, Environmental Compliance Director, Water
Treatment and Supply
The Pittsburgh Water and Sewer Authority

Dated: May 17, 2021

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
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Request: Commissioner Yanora -I-3 The number of commercial meters in the system, the number tested, and the number passed or failed for year 2020.

Response: Commercial Water Meters in PWSA System – 9,827
Commercial Water Meters Tested in 2020 – 917
Commercial Water Meters Passed Testing in 2020 – 816
Commercial Water Meters Failed Testing in 2020 – 101

Response Provided by: Julie A. Quigley, Director of Customer Service
The Pittsburgh Water and Sewer Authority

Dated: May 17, 2021

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
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Request: Commissioner Yanora -I-4 The number of valves exercised in calendar year 2020 and the frequency of valve maintenance.

Response: PWSA plans to dedicate two valve crews to focus on inspecting and exercising valves. These inspections, along with the daily activity of exercising valves for leaks and other scheduled activities, will allow PWSA to inspect 1/5 of our system each year. Since Jan 1, 2021 PWSA has exercised 916 valves; our plan moving forward is to inspect and exercise 1/5 or approx. 5200 valves each year.

Response Provided by: Barry King, PE, Director of Engineering
William McFaddin, Director Of Operations
The Pittsburgh Water and Sewer Authority

Dated: May 17, 2021

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
to the April 30, 2021 Questions from Commissioner Ralph V. Yanora in
Docket Nos. R-2021-3024773 (water); R-2021-3024774 (wastewater)
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Request: Commissioner Yanora -I-5 The number of commercial and industrial customers that have testable backflow prevention devices and the number of devices that were tested for calendar year 2020.

Response:

Commercial and Industrial Customers with Testable Backflow Prevention Devices – 3,672
Commercial and Industrial Customers with Testable Backflow Prevention Devices Tested in 2020 – 2,048

PWSA has commissioned updates to its backflow testing application that will allow for a concentrated effort to enroll any unenrolled devices. In 2021, enrollment will be achieved via a series of notices, and, where necessary, service termination.

Response Provided by: Julie A. Quigley, Director of Customer Service
The Pittsburgh Water and Sewer Authority

Dated: May 17, 2021

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
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Docket Nos. R-2021-3024773 (water); R-2021-3024774 (wastewater)
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Request: Commissioner Yanora -I-6 Tariff backflow prevention requirements regarding residential fire protection and irrigation and whether PWSA has a plan for inspection and testing of fire hydrants

Response:

PWSA has dedicated two employees to flush and inspect hydrants every day, weather permitting. On average, each employee can inspect 15 hydrants a day, from Jan 1, 2021 until May 11, 2021 PWSA has inspected 1562 hydrant throughout our system. We are on track to meet this goal of 1/3 of our system or 2504 hydrants each year.

Response Provided by: Barry King, PE, Director of Engineering
William McFaddin, Director Of Operations
The Pittsburgh Water and Sewer Authority

Dated: May 17, 2021

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
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and R-2021-3024779 (stormwater)**

Request: Commissioner Yanora -I-7 Whether PWSA has surveyed the number of fire hydrants that do not provide a minimum flow of 500 gpm at 20 psig.

Response: The 2020 Water Distribution Master Plan used the PWSA hydraulic model to assess areas of low fire flow. The distribution system mainly identified areas where a minimum flow of 1,500 gpm at 20 psig could not be met. The report concluded that increasing minimum pipe size to 8-inch would greatly improve fire flow in most areas. PWSA is currently rerunning the hydraulic model to identify specific hydrants that do not provide a minimum flow of 500 gpm at 20 psig. PWSA will supplement this response with this additional data when completed.

Response Provided by: Barry King, PE, Director of Engineering
Sarah Bolenbaugh, PE, Senior Group Manager, Water Programs
The Pittsburgh Water and Sewer Authority

Dated: May 17, 2021

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
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and R-2021-3024779 (stormwater)**

Request: Commissioner Yanora -I-8 Whether residential customers have American Society of Sanitary Engineers 1024 backflow assemblies installed at meter locations.

Response: Not all residential customers have backflow devices installed; they are installed on new water service installations and when any alterations are made to the interior plumbing. All backflows installed are to either AWWA or ASSE approved specifications.

Response Provided by: Barry King, PE, Director of Engineering
Rick Obermeier, Chief of Operations
The Pittsburgh Water and Sewer Authority

Dated: May 17, 2021

**Response of the Pittsburgh Water and Sewer Authority (“PWSA”)
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Request: Commissioner Yanora -I-9 Whether PWSA has evaluated its lost and unaccounted water performance since 2018 and any relevant results.

Response: PWSA has completed the AWWA Water Audit for 2019 and 2020 and submitted the Audit to the PUC as required. PWSA has a higher water loss than is desirable. Near term projects to try to quantify water loss include the rehabilitation of existing flow meters at all pump stations, installation of flow meters at the discharge of all tanks and storage reservoirs (under various projects), and the initiation of a district metering program (to commence in 2023/2024). Near term projects to decrease water loss include the small diameter main replacement program, large diameter main program, and the intermediate main program (to commence in 2023). As part of the large diameter and intermediate main programs, internal pipe inspections will be conducted to detect and quantify leaks.

Response Provided by: Barry King, PE, Director of Engineering
Sarah Bolenbaugh, PE, Senior Group Manager, Water Programs
The Pittsburgh Water and Sewer Authority

Dated: May 17, 2021

VERIFICATION

I, Barry King hereby state that I am Director of Engineering and Construction of The Pittsburgh Water and Sewer Authority. I hereby verify that the facts set forth in the attached discovery responses which I am sponsoring are true and correct to the best of my knowledge, information and belief. 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 5/17/21



Barry King, Director of Engineering and Construction
The Pittsburgh Water and Sewer Authority

VERIFICATION

I, Julie Quigley hereby state that I am Director of Customer Service of The Pittsburgh Water and Sewer Authority. I hereby verify that the facts set forth in the attached discovery responses which I am sponsoring are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

05/17/2021 | 10:35 AM PDT

Dated

DocuSigned by:

Julie Quigley

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Julie Quigley, Director of Customer Service
The Pittsburgh Water and Sewer Authority