



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
COMMONWEALTH KEYSTONE BUILDING
400 NORTH STREET, HARRISBURG, PA 17120

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

May 18, 2021

Via Electronic Mail

Deanne M. O'Dell, Esq.
Daniel Clearfield, Esq.
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)
R-2021-3024774 (Wastewater)
R-2021-3024779 (Stormwater)

I&E Interrogatories

Dear Counsel:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Interrogatories I&E-RS-1 through I&E-RS-6 – Cline** for the above-referenced proceedings. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to these Interrogatories are due within fifteen (15) calendar days pursuant to 52 Pa. Code Section 5.342(d). Please provide your responses to me via email at the email address listed below.

Copies are being served on parties of record per the attached Certificate of Service. *Due to the temporary closing of the PUC's offices, I&E is only providing electronic service.* Should you have any questions, please do not hesitate to contact me.

Sincerely,

Gina L. Miller
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 313863
(717) 787-8754
ginmiller@pa.gov

GLM/ac
Enclosures

cc: Rosemary Chiavetta, Secretary (*Cover Letter and Certificate of Service only – via e-file*)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatories** dated May 18, 2021, in the manner and upon the persons listed below:

Served via Electronic Mail Only

Deanne M. O'Dell, Esq.
Daniel Clearfield, Esq.
Lauren Burge, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com
dclearfield@eckertseamans.com
lburge@eckertseamans.com
*Counsel for
Pittsburgh Water and Sewer Authority*

Thomas J. Sniscak, Esq.
Kevin J. McKeon, Esq.
Whitney E. Snyder, Esq.
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
kjmckeon@hmslegal.com
tjsniscak@hmslegal.com
wesnyder@hmslegal.com

Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Ria M. Pereira, Esq.
Lauren N. Berman, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@palegalaid.net
Counsel for Pittsburgh United

Yvonne S. Hilton
John. F. Doherty
Lawrence H. Baumiller
City of Pittsburgh, Department of Law
City-County Building, Suite 313
414 Grant Street
Pittsburgh, PA 15219
yvonne.hilton@pittsburghpa.gov
john.doherty@pittsburghpa.gov
lawrence.baumiller@pittsburghpa.gov

Christine Maloni Hoover, Esq.
Erin L. Gannon, Esq.
Lauren E. Guerra, Esq.
Luis M. Melendez, Esq.
Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101-1921
choover@paoca.org
egannon@paoca.org
lguerra@paoca.org
lmelendez@paoca.org

Erin K. Fure, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
efure@pa.gov

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue, Suite 720T
St. Louis, MO 63105
excel.consulting@sbcglobal.net
Consultant for OSBA

Terry L. Fought
780 Cardinal Drive
Harrisburg, PA 17111
ocapwsa2021@paoca.org
Consultant for OCA

Roger D. Colton
Fisher, Sheehan & Colton
34 Warwick Road
Belmont, MA 02478
ocapwsa2021@paoca.org
Consultant for OCA

Dante Mugrace
PCMG and Associates
90 Moonlight Court
Toms River, NJ 08753
ocapwsa2021@paoca.org
Consultant for OCA

Barbara R. Alexander
Barbara Alexander Consulting, LLC
83 Wedgewood Drive
Winthrop, ME 04364
ocapwsa2021@paoca.org
Consultant for OCA

Scott J. Rubin
333 Oak Lane
Bloomsburg, PA 17815
ocapwsa2021@paoca.org
Consultant for OCA



Gina L. Miller
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 313863