


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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June 3, 2021

Via Electronic Mail Only

Deanne O'Dell, Esquire
Daniel Clearfield, Esquire
Karen O. Moury, Esquire
Lauren M. Burge, 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 X, in the above-referenced proceedings.

In accordance with the Commission's Rules of Practice and Procedure, as modified during the June 1, 2021 Prehearing Conference, we request that PWSA provide verified answers to these inquiries within ten (10) days of service on a best-efforts basis, but no later than 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 consultant, as listed below:

Barbara R. Alexander
Barbara Alexander Consulting, LLC
83 Wedgewood Drive
Winthrop, Maine 04364
E-Mail: OCAPWSA2021@paoca.org

Deanne O'Dell, Esquire
Daniel Clearfield, Esquire
Karen O. Moury, Esquire
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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).

Sincerely,

/s/ Lauren E. Guerra
Lauren E. Guerra
Assistant Consumer Advocate
PA Attorney I.D. # 323192
E-Mail: LGuerra@paoca.org

Enclosures:

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

*310325

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission : Docket Nos. 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 X, 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 3rd day of June 2021.

SERVICE BY E-MAIL ONLY

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Pennsylvania Public Utility Commission
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/s/ Lauren E. Guerra
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Dated: June 3, 2021
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