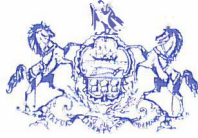



COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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

 @pa_oca

 /pennoca

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

June 4, 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 XI, 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:

Terry L. Fought
780 Cardinal Drive
Harrisburg, PA 17111
E-Mail: OCAPWSA2021@paoca.org

Deanne O'Dell, Esquire
Daniel Clearfield, Esquire
Karen O. Moury, Esquire
Lauren M. Burge, Esquire
June 4, 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).

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

*310390

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 XI, 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 4th day of June 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

Erin K. Fure, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923

Deanne M. 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

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

Thomas J. Sniscak, Esquire
Kevin J. McKeon, Esquire
Whitney E. Snyder, Esquire
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101

Yvonne S. Hilton, Esquire
John F. Doherty, Esquire
Lawrence H. Baumiller, Esquire
City of Pittsburgh Department of Law
City-County Building
414 Grant Street, Suite 313
Pittsburgh, PA 15219

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

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: June 4, 2021
*310387

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