

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

BUREAU OF INVESTIGATION & ENFORCEMENT

June 8, 2021

Via Electronic Mail

Deanne M. O'Dell, Esq.
Daniel Clearfield, Esq.
Karen O. Moury, Esq.
Lauren Burge, 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-7 through I&E-RS-9** – **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).

Pursuant to the Prehearing Conference held in this matter on June 1, 2021, the responses to these Interrogatories are due within fifteen (15) calendar days, however PWSA has committed to use its best efforts to answer within ten (10) days. 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 June 8, 2021, in the manner and upon the persons listed below:

## **Served via Electronic Mail Only**

Deanne M. O'Dell, Esq. Yvonne S. Hilton Daniel Clearfield, Esq. John. F. Doherty Karen O. Moury, Esq. Lawrence H. Baumiller Lauren Burge, Esq. City of Pittsburgh, Department of Law Eckert Seamans Cherin & Mellott, LLC City-County Building, Suite 313 213 Market Street, 8th Floor 414 Grant Street Harrisburg, PA 17101 Pittsburgh, PA 15219 dodell@eckertseamans.com vvonne.hilton@pittsburghpa.gov john.doherty@pittsburghpa.gov dclearfield@eckertseamans.com lawrence.baumiller@pittsburghpa.gov kmoury@eckertseamans.com lburge@eckertseamans.com Counsel for the City of Pittsburgh Counsel for

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
Counsel for the City of Pittsburgh

Pittsburgh Water and Sewer Authority

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

Christine Maloni Hoover, Esq. Erin L. Gannon, Esq. Lauren E. Guerra, Esq. Office of Consumer Advocate Forum Place 555 Walnut Street, 5<sup>th</sup> Floor Harrisburg, PA 17101-1921 ocapwsa2021@paoca.org

Erin K. Fure, Esq.
Teresa Reed Wagner
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1<sup>st</sup> Floor
Harrisburg, PA 17101
efure@pa.gov
tereswagne@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

David Habr Habr Economics 213 Cornuta Way Nipomo, CA 93444-5020 ocapwsa2021@paoca.org Consultant for OCA

Gina L. Miller Prosecutor

Bureau of Investigation and Enforcement PA Attorney ID No. 313863