



COMMONWEALTH OF PENNSYLVANIA

June 17, 2021

Daniel Clearfield, Esq.
Deanne M. O'Dell, Esq.
Karen Moury, Esq.
Sarah Stoner, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101

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

Dear Counsel:

Enclosed please find the Interrogatories, **Set III**, of the Office of Small Business Advocate (“OSBA”), to Pittsburgh Water Sewer Authority (Water, Wastewater, Stormwater), in the above-referenced proceedings.

We respectfully request that you provide verified answers to these inquiries within fifteen (15) days of service. Additionally, please serve one copy on OSBA’s consultant, Brian Kalcic, as indicated below:

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

Copies of these Interrogatories will be served upon all parties, as indicated on the attached Certificate of Service. Additionally, this Certificate of Service has been electronically filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission, as required by 52 Pa. Code § 5.341(b). If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Erin K. Fure

Erin K. Fure
Assistant Small Business Advocate
Attorney ID No. 312245

Enclosures

cc: PA PUC Secretary Rosemary Chiavetta (Cover Letter & Certificate of Service only)
Brian Kalcic
Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2021-3024773 (water)
v.	:	Docket No. R-2021-3024774(wastewater)
	:	Docket No. R-2021-3024779(stormwater)
Pittsburgh Water & Sewer Authority	:	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been served via email (*unless other noted below*) upon the following persons, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

Christine M. Hoover, Esq.
Erin L. Gannon, Esq.
Lauren E. Guerra, Esq.
Office of Consumer Advocate
555 Walnut Street 5th Floor, Forum Place
Harrisburg, PA 17101
choover@paoca.org
lguerra@paoca.org
egannon@paoca.org
(Counsel for OCA)

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

Gina L. Miller, Esq.
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120
ginmiller@pa.gov
(Counsel for BIE)

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

Daniel Clearfield, Esq.
Deanne M. O'Dell, Esq.
Karen Moury, Esq.
Sarah Stoner, Esq.
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com
dclearfield@eckertseamans.com
kmoury@eckertseamans.com
SStoner@eckertseamans.com

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
pulp@palegalaid.net

/s/ Erin K. Fure

Erin K. Fure
Assistant Small Business Advocate
Attorney ID No. 312245

DATE: June 17, 2021