



COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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July 13, 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  
8<sup>th</sup> 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 XII, in the above-referenced proceedings.

In accordance with the Commission's Rules of Practice and Procedure, as modified by Prehearing Order #2 dated June 17, 2021, we request that PWSA provide verified answers to these inquiries within ten (10) 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](mailto:OCAPWSA2021@paoca.org)

Deanne O'Dell, Esquire  
Daniel Clearfield, Esquire  
Karen O. Moury, Esquire  
Lauren M. Burge, Esquire  
July 13, 2021  
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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/ Erin L. Gannon  
Erin L. Gannon  
Senior Assistant Consumer Advocate  
PA Attorney I.D. # 83487  
E-Mail: [EGannon@paoca.org](mailto:EGannon@paoca.org)

Enclosures:

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

\*313412

## 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, Set XII, 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 13<sup>th</sup> day of July 2021.

### **SERVICE BY E-MAIL ONLY**

Gina L. Miller, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
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Harrisburg, PA 17120

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118 Locust Street  
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Jared J. Thompson, Esquire  
Peter J. DeMarco, Esquire  
Natural Resources Defense Council  
1152 15<sup>th</sup> Street NW  
Suite 300  
Washington, DC 20005

**SERVICE BY E-MAIL ONLY (continued)**

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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/ Erin L. Gannon

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