



September 7, 2021

**VIA E-File**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, Filing Room  
Harrisburg, PA 17120

**Re: PA Public Utility Commission v. Pittsburgh Water and Sewer Authority**  
*Docket Nos. R-2021-3024773, R-2021-3024774, R-2021-3024779*

Dear Secretary Chiavetta,

In accordance with 52 Pa. Code § 5.412a and the Post-Hearing Order and Errata entered August 17, 2021 and August 18, 2021, attached hereto, please accept for filing **Pittsburgh United St. No. 2-SR - Surrebuttal Testimony of Michele C. Adams** that was duly admitted into the record at the hearing held in the above-captioned proceeding on August 13, 2021, before Administrative Law Judge Eranda Vero.

A copy of this letter is being served on ALJ Vero and the parties of record consistent with the attached Certificate of Service. Please contact me with any questions or concerns.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Ria M. Pereira".

Ria M. Pereira, Esq.  
*Counsel for Pittsburgh United*

CC: Certificate of Service (Cover Letter/ COS only)  
Honorable Eranda Vero (Cover Letter/ COS only)  
Pamela McNeal, [pmcneal@pa.gov](mailto:pmcneal@pa.gov) (Cover Letter/ COS only)

Enclosures.

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	
v.	:	<b>Docket Nos. R-2021-3024773</b>
	:	<b>R-2021-3024774</b>
<b>Pittsburgh Water and Sewer Authority</b>	:	<b>R-2021-3024779</b>
	:	

**Certificate of Service**

I hereby certify I have on this day served copies of **Compliance Filing, 52 Pa. Code § 5.412a, Pittsburgh United Statement 2-SR**, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party) and consistent with the Commission’s Emergency Order issued on March 20, 2020, in the manner and upon the persons listed below.

**VIA EMAIL ONLY**

Daniel Clearfield, Esq. Deanne M. O'Dell, Esq. Karen Moury, Esq. Lauren M. Burge, Esquire Sarah Stoner, Esq. Eckert Seamans Cherin & Mellott, LLC 213 Market Street, 8 <sup>th</sup> Floor Harrisburg, PA 17101 <a href="mailto:dodell@eckertseamans.com">dodell@eckertseamans.com</a> <a href="mailto:dclearfield@eckertseamans.com">dclearfield@eckertseamans.com</a> <a href="mailto:kmoury@eckertseamans.com">kmoury@eckertseamans.com</a> <a href="mailto:lburge@eckertseamans.com">lburge@eckertseamans.com</a> <a href="mailto:SStoner@eckertseamans.com">SStoner@eckertseamans.com</a>	Teresa Reed Wagner Erin Fure, Esq. Office of Small Business Advocate Forum Place 555 Walnut Street, 1st Floor Harrisburg, PA 17101 <a href="mailto:tereswagne@pa.gov">tereswagne@pa.gov</a> <a href="mailto:efure@pa.gov">efure@pa.gov</a>
Gina L. Miller, Esq. Bureau of Investigation and Enforcement Commonwealth Keystone Building 400 North Street, 2 <sup>nd</sup> Floor Harrisburg, PA 17120 <a href="mailto:ginmiller@pa.gov">ginmiller@pa.gov</a>	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  <a href="mailto:choover@paoca.org">choover@paoca.org</a> <a href="mailto:lguerra@paoca.org">lguerra@paoca.org</a> <a href="mailto:egannon@paoca.org">egannon@paoca.org</a> <a href="mailto:OCAPWSA2021@paoca.org">OCAPWSA2021@paoca.org</a>

<p>Yvonne Hilton, Esq.  John F. Doherty, Esq.  Lawrence H. Baumiller, Esq.  City of Pittsburgh Department of Law  313 City-County Building  414 Grant Street  Pittsburgh, PA 15219  <a href="mailto:yvonne.hilton@pittsburghpa.gov">yvonne.hilton@pittsburghpa.gov</a>  <a href="mailto:john.doherty@pittsburghpa.gov">john.doherty@pittsburghpa.gov</a>  <a href="mailto:lawrence.baumiller@pittsburghpa.gov">lawrence.baumiller@pittsburghpa.gov</a></p>	<p>Whitney E. Snyder, Esq.  Kevin J. McKeon, Esq.  Thomas J. Sniscak, Esq.  Hawke McKeon and Sniscak, LLP  100 N. 10th Street  Harrisburg, PA 17101  <a href="mailto:wesnyder@hmslegal.com">wesnyder@hmslegal.com</a>  <a href="mailto:kjmckeon@hmslegal.com">kjmckeon@hmslegal.com</a>  <a href="mailto:tjsniscak@hmslegal.com">tjsniscak@hmslegal.com</a></p>
<p>Peter J. DeMarco, Esq.  Natural Resources Defense Council  1152 15th Street NW, Ste. 300  Washington, DC 20005  Telephone: 202-289-2385  <a href="mailto:pdemarco@nrdc.org">pdemarco@nrdc.org</a></p>	<p>Jared J. Thompson, Esq.  Natural Resources Defense Council  1152 15th Street NW, Ste. 300  Washington, DC 20005  Telephone: (202) 513-6249  <a href="mailto:jared.thompson@nrdc.org">jared.thompson@nrdc.org</a></p>
<p>Brian Kalcic  Excel Consulting  225 S. Meramec Avenue, Suite 720T  St. Louis, MO 63105  <a href="mailto:excel.consulting@sbcglobal.net">excel.consulting@sbcglobal.net</a></p>	<p>Administrative Law Judge Eranda Vero  801 Market Street  Suite 4063  Philadelphia, PA 19107  <a href="mailto:evero@pa.gov">evero@pa.gov</a>  cc: Pamela McNeal, <a href="mailto:pmcneal@pa.gov">pmcneal@pa.gov</a></p>

Respectfully submitted,  
**PENNSYLVANIA UTILITY LAW PROJECT**  
*Counsel for Pittsburgh United*



Ria M. Pereira, PA ID 316771  
118 Locust Street, Harrisburg, PA 17101  
717-236-9486 / [pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)

Date: September 7, 2021

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Pennsylvania Public Utility Commission</b>	:	
	:	
<b>v.</b>	:	<b>Docket Nos. R-2021-3024773</b>
	:	<b>R-2021-3024774</b>
<b>Pittsburgh Water and Sewer Authority</b>	:	<b>R-2021-3024779</b>
	:	

**SURREBUTTAL TESTIMONY OF MICHELE C. ADAMS**

**ON BEHALF OF**

**PITTSBURGH UNITED**

August 6, 2021

**Topic Addressed:**

Stormwater

1           **PREPARED SURREBUTTAL TESTIMONY OF MICHELE C. ADAMS**

2   **I.    Introduction**

3   **Q:    Please state your name, occupation, and business address.**

4   A:    Michele C. Adams. I am a licensed professional engineer in Pennsylvania, Delaware,  
5   Maryland, New York, and Virginia, and a LEED Accredited Professional.<sup>1</sup> I am Founder and  
6   Principal of Meliora Design, 259 Morgan Street, Phoenixville, PA, 19460.

7   **Q:    Did you previously submit testimony in this proceeding?**

8   A:    Yes. I submitted direct testimony pre-marked as Pittsburgh United Statement 2, in which  
9   I offered recommendations regarding PWSA’s stormwater tariff.

10   **Q:    What is the purpose of your surrebuttal testimony?**

11   A:    The purpose of my surrebuttal testimony is to respond to rebuttal testimony regarding  
12   PWSA’s stormwater tariff from Tony Igwe, Keith Readling, and Julie Quigley, offered on behalf  
13   of PWSA, from Scott Rubin, offered on behalf of OCA, and from Brian Kalcic, offered on behalf  
14   of OSBA. My surrebuttal is not intended to address every issue raised or otherwise discussed by  
15   PWSA’s witnesses or any witness’s rebuttal testimony. Absence of a response to any specific  
16   recommendation or position of any witness does not indicate my agreement. To the extent an  
17   argument raised by any party in rebuttal is already sufficiently addressed in my direct testimony,  
18   I do not intend to respond and stand by the evaluations, analyses, and recommendations  
19   contained in my direct testimony.

20   **Q:    How is your testimony organized?**

21   A:    First, I respond to rebuttal testimony regarding my recommendation that PWSA phase  
22   out its proposed stormwater gradualism adjustment. Then I address PWSA’s rejection of my

---

<sup>1</sup> LEED (Leadership in Energy and Environmental Design) is a widely used green building rating system developed by the U.S. Green Building Council. See <https://www.usgbc.org/help/what-leed>.

1 recommendation to increase the reduction of the stormwater fee for customers enrolled in the  
2 Bill Discount Plan from 75% to 100%. Next, I turn to the need for PWSA to collect adequate  
3 data related to the implementation of its stormwater fee credit program. Then I discuss PWSA’s  
4 education and outreach efforts related to both its Stormwater Master Plan and its stormwater fee.  
5 Finally, I address the consideration of low income and environmental justice issues in PWSA’s  
6 stormwater infrastructure planning.

7 **II. Stormwater Gradualism Adjustment**

8 **Q: Please summarize the testimony from Mr. Readling and Mr. Kalcic regarding your**  
9 **recommendation that “PWSA should eliminate or phase out the stormwater gradualism**  
10 **adjustment as quickly as possible”?**

11 A: Mr. Readling states that he does not agree with my position, which he characterizes as  
12 “extreme,” and testifies that the gradualism adjustment is reasonable in this rate case and will be  
13 reexamined in future rate cases.<sup>2</sup> Mr. Kalcic testifies that he agrees with my recommendation  
14 “only in part” because the stormwater subsidy should not be eliminated in this proceeding but  
15 should be temporary, such that “stormwater customers should pay cost-based rates for  
16 stormwater service at some point in the not-too-distant future.”<sup>3</sup>

17 **Q: What is your response to Mr. Readling’s and Mr. Kalcic’s rebuttal testimony**  
18 **regarding the stormwater gradualism adjustment?**

19 A: First, it appears that no one disputes the underlying rationale for my recommendation,  
20 which is that “the most fair and equitable rate structure will be one that recovers all stormwater  
21 costs of service through stormwater rates based on impervious area.”<sup>4</sup> PSWA’s stormwater

---

<sup>2</sup> PWSA St. 8-R, at 5:12-13, 5:24 – 6:8.

<sup>3</sup> OSBA St. 1-R, at 7:10 – 8:6.

<sup>4</sup> Pittsburgh United St. 2, at 23:17-19.

1 advisory group and PWSA’s witness Mr. Igwe have both agreed that recovering stormwater  
2 costs through wastewater rates is not equitable;<sup>5</sup> PWSA’s witness Mr. Readling appears to agree  
3 that PWSA should move toward recovering the full costs of stormwater service through the  
4 stormwater fee in the future;<sup>6</sup> OSBA’s witness Mr. Kalcic testified that “stormwater customers  
5 should pay cost-based rates for stormwater service at some point in the not-too-distant future”;<sup>7</sup>  
6 OCA’s witness Mr. Rubin testified that “charging wastewater customers for stormwater service  
7 is not consistent with principles of cost causation” but is helpful as a “short-term subsidy”;<sup>8</sup> and  
8 I&E’s witness Mr. Cline supports reevaluating the stormwater gradualism adjustment on a case-  
9 by-case basis if PWSA proposes to retain it in future base rate cases.<sup>9</sup>

10 Second, based on this same testimony, it appears that there is broad agreement that the  
11 stormwater gradualism adjustment should be temporary and that PWSA should move toward  
12 recovering all stormwater costs of service through stormwater rates in the future.

13 **Q: After seeing the rebuttal testimony, do you stand by your recommendation**  
14 **regarding the stormwater gradualism adjustment?**

15 A: Yes, I continue to recommend that PWSA should eliminate or phase out the stormwater  
16 gradualism adjustment as quickly as possible, even if that does not occur in this base rate case,  
17 and I do not think my position is “extreme” in light of the apparent agreement that the  
18 gradualism adjustment is not equitable over the long-term and should be temporary. To the  
19 extent that the gradualism adjustment is retained in this base rate case, I agree that it should be

---

<sup>5</sup> PWSA St. 7, at 3:7-8 & Exh. TI-3, at 3.

<sup>6</sup> PWSA St. 8-R, at 5:12-13, 5:18-19, 6:7-8.

<sup>7</sup> OSBA St. 1-R, at 7:10-13.

<sup>8</sup> OCA St. 3-R, at 7:19-21; see also OCA St. 3, at 23:17-18.

<sup>9</sup> I&E St. 3, at 25:1-7.

1 reexamined in future base rate cases and that PWSA should move toward recovering all  
2 stormwater costs through stormwater rates in the long term.

3 **III. Stormwater Fee for Bill Discount Program Customers**

4 **Q: Please summarize PWSA’s testimony regarding your recommendation that PWSA’s**  
5 **proposed reduction of the stormwater fee for customers enrolled in the Bill Discount**  
6 **Program should be increased from 75% to 100%?**

7 A: Ms. Quigley opposes such an increase on the grounds that customers enrolled in the Bill  
8 Discount Program benefit from PWSA’s stormwater services and therefore should help fund  
9 those services.<sup>10</sup> Ms. Quigley testifies that a 100% reduction of the stormwater fee would mean  
10 that customers enrolled in the Bill Discount Program “would not be charged anything for this  
11 service,” and that this would not be “an equitable result.”<sup>11</sup>

12 **Q: Do you agree with Ms. Quigley’s testimony?**

13 A: No. For the most part, it is not correct that a 100% discount on the stormwater fee would  
14 result in Bill Discount Program participants paying nothing toward stormwater services. As  
15 discussed above and in my direct testimony, PWSA’s proposed stormwater gradualism  
16 adjustment, if approved, would mean that stormwater costs will continue to be subsidized by  
17 wastewater charges. As Ms. Quigley notes, Bill Discount Program participants typically are  
18 charged for wastewater service.<sup>12</sup> Thus, they would continue to help fund PWSA’s stormwater  
19 services even if PWSA applied a 100% reduction to their stormwater fee.<sup>13</sup>

---

<sup>10</sup> PWSA St. 6-R, at 85:6-13.

<sup>11</sup> PWSA St. 6-R, at 85:19-21.

<sup>12</sup> PWSA St. 6-R, at 85:14-19.

<sup>13</sup> An exception to this conclusion is Bill Discount Program customers who receive a 100% discount on fixed water and wastewater charges and do not use enough water to incur volumetric charges. See <https://www.pgh2o.com/residential-commercial-customers/rates/our-water-future> (table showing Requested Rates - Customers Eligible for Bill Assistance, for customers using less than 2,000 gallons per month). Such customers would not contribute to the costs for water, wastewater, or stormwater services if they receive a 100% reduction of the stormwater fee.



1           Moreover, it is reasonable to provide a 100% discount on stormwater fees to customers  
2 enrolled in the Bill Discount Program who cannot afford to pay. Although Ms. Quigley points  
3 out that the Commission has not provided clear direction on what constitutes “affordable” rates  
4 for water, wastewater, and stormwater services,<sup>14</sup> neither Ms. Quigley nor any other witness in  
5 this proceeding directly disputes Mr. Geller’s conclusion that the stormwater fee “will further  
6 exacerbate affordability issues” for Bill Discount Program customers.<sup>15</sup> Nor does any witness  
7 dispute that providing a 100% reduction on stormwater fees to Bill Discount Program customers  
8 would cost PWSA little in the way of revenue, particularly given the avoided costs of pursuing  
9 collections for unpaid fees from these economically vulnerable customers. I continue to believe  
10 that increasing the discount on the stormwater fee for low income customers is a reasonable  
11 measure to ensure safe and affordable service.

12 **IV. Stormwater Fee Credit Program**

13 **Q: Please summarize PWSA’s rebuttal testimony regarding your concerns that the**  
14 **stormwater credit program may not sufficiently incentivize participation, especially by**  
15 **landlords, and your recommendation that PWSA collect data on the credit program?**

16 A: Mr. Readling testifies that the incentives offered by the credit program will become more  
17 effective in the future, when PWSA anticipates proposing higher stormwater rates to reflect  
18 additional stormwater projects and to account for moving toward recovering the full costs of  
19 service through stormwater rates.<sup>16</sup> He disagrees that landlords may have less incentive to  
20 participate in the credit program, on the basis that landlords are ultimately responsible for PWSA

---

<sup>14</sup> PWSA St. 6-R, at 70:8-17.

<sup>15</sup> See Pittsburgh United St. 1, at 48:11-16; see also OCA St. 4, at 10:8 – 11:11 (concluding that “[e]ven given the bill discounts proposed by PWSA, . . . PWSA bills remain unaffordable to a substantial segment of the Authority’s low-income population.”).

<sup>16</sup> PWSA St. 8-R, at 11:3-13.

1 charges at their tenant-occupied properties.<sup>17</sup> Additionally, Mr. Readling confirms that PWSA  
2 will track data on participation in the credit program and use that data in the future to determine  
3 whether modifications are necessary.<sup>18</sup>

4 **Q: What is your response to Mr. Readling’s testimony regarding the degree to which**  
5 **the stormwater credit program is likely to incentivize participation?**

6 A: Mr. Readling’s testimony focuses on future incentives that may be enhanced by changes  
7 to PWSA’s stormwater rates in future rate cases. I cannot evaluate those incentives at this time  
8 without knowing what those future rates may be. However, for the period covered by this base  
9 rate case, I stand by my concern that many property owners may not have a sufficient incentive  
10 to participate, and I continue to recommend that PWSA should compile data regarding  
11 participation in the credit program to facilitate consideration of possible revisions to the program  
12 in the future.

13 **Q: What is your response to Mr. Readling’s testimony regarding the incentives for**  
14 **landlords to participate in the stormwater credit program?**

15 A: I continue to be concerned that there are split-incentive problems that are likely to  
16 disincentivize some landlords from participating in the stormwater credit program. Even  
17 assuming that landlords are ultimately responsible for PWSA charges for their tenant-occupied  
18 properties,<sup>19</sup> I expect many landlords will be unlikely to invest in stormwater improvements to  
19 obtain a stormwater credit when they can pass along the stormwater fee to their tenants most of  
20 the time. This problem is particularly acute for landlords who pass along actual utility costs to

---

<sup>17</sup> PWSA St. 8-R, at 11:20 – 12:3.

<sup>18</sup> PWSA St. 8-R, at 11:15-17.

<sup>19</sup> I am advised by counsel that PWSA’s authority to assess liens and the question of whether debt stays with the property are issues to be addressed in the proceedings related to the Compliance Plan. I am not taking a position on these issues.

1 their tenants, either by adding the tenant to the PWSA bill or by billing the tenant for the actual  
2 PWSA charges. Such landlords would pay the costs for stormwater improvements but their  
3 tenants would typically receive the benefits of the stormwater credit (unless the tenant fails to  
4 pay and the landlord is required to pay the PWSA charges instead). I do not have data on how  
5 landlords in Pittsburgh bill their tenants for utilities to be able to determine what leasing  
6 structures are more or less prevalent. Regardless, PWSA's collection of data regarding  
7 participation in the stormwater credit program should, over time, reveal whether my participation  
8 concerns come to pass and I continue to recommend that PWSA consider future modifications to  
9 the stormwater credit program if it turns out that the rate of participation for residential rental  
10 properties is low.

11 **Q: What is your response to Mr. Readling's testimony regarding data collection for the**  
12 **credit program?**

13 A: I agree that PWSA should collect and track data on participation in the stormwater credit  
14 program and use those data to consider modifications to the stormwater credit program in future  
15 rate cases. However, Mr. Readling did not specify exactly what data would be collected.

16 As discussed in my direct testimony, I recommend that PWSA collect data that includes,  
17 among other things: (1) the customer's stormwater fee tier (or number of ERUs); (2) the  
18 customer's self-reported reason for pursuing a credit; (3) the cost of the credit-eligible  
19 stormwater management measure; and (4) for nonresidential properties, whether the property is  
20 eligible for a credit because the owner invested in stormwater retrofits or because it was a new  
21 development or redevelopment that was already required to meet the Pittsburgh 2016 or 2019  
22 stormwater standards.<sup>20</sup> In addition, after reviewing Mr. Readling's rebuttal testimony, I also

---

<sup>20</sup> See Pittsburgh United St. 2, at 31:14-19.

1 recommend that PWSA's data collection include at least: (5) the customer class of the  
2 participant; (6) for residential customers, whether the customer is enrolled in the Bill Discount  
3 Program; (7) the location of the property, including the nine-digit zip code; (8) the amount of the  
4 credit for each property; (9) the basis for granting a credit to each property; (10) whether the  
5 property is owner-occupied or tenant-occupied; and (11) for tenant-occupied non-single-family-  
6 residential properties, whether the property contains residential dwelling units. Collecting these  
7 data will allow PWSA to understand who is participating in and benefitting from the credit  
8 program and whether changes may be appropriate to encourage broader participation, such as  
9 supplementing the credit program with a grant or reimbursement program for stormwater  
10 retrofits for low income property owners and low income rental properties.

11 **V. Education and Outreach for Stormwater Fee and Master Plan**

12 **Q: Please summarize PWSA's rebuttal testimony regarding public input on the**  
13 **Stormwater Master Plan?**

14 A: Mr. Igwe testifies that a Stakeholder Engagement Plan is currently being developed and  
15 that, once it is complete, PWSA intends to make it publicly available and begin conducting  
16 outreach to inform the development of the master plan.<sup>21</sup>

17 **Q: What is your response regarding public input on the Stormwater Master Plan?**

18 A: As I indicated in my direct testimony,<sup>22</sup> I strongly support PWSA conducting a robust  
19 stakeholder input process throughout the master planning process and I am pleased to see Mr.  
20 Igwe's confirmation that this stakeholder input process is being developed.

21 Given the timeline for the development of the stormwater master plan relative to the  
22 timeline for the resolution of this base rate case, I recommend that PWSA proceed with the

---

<sup>21</sup> PWSA St. 7-R, at 5:22-25.

<sup>22</sup> See Pittsburgh United St. 2, at 8:9-22.

1 development of the stormwater master plan and with the stakeholder input process for the master  
2 plan in parallel with this rate case (as it appears to be doing already), rather than waiting until the  
3 Commission's decision in this rate case before moving forward with the master planning process.  
4 PWSA anticipates that the Stormwater Master Plan will be completed by summer 2022,<sup>23</sup> and I  
5 am informed by counsel that the Commission is anticipated to consider this rate case during its  
6 December 16, 2021, public meeting. If PWSA were to defer soliciting stakeholder input on the  
7 Stormwater Master Plan until sometime after December 16, 2021, I would be concerned that  
8 substantial portions of the master planning process may already be complete, depriving  
9 stakeholders of a meaningful opportunity for input, or that starting to receive stakeholder input  
10 about halfway through the process could delay the completion of the Stormwater Master Plan.

11 **Q: Please summarize PWSA's rebuttal testimony regarding education and outreach**  
12 **efforts for the stormwater tariff?**

13 A: Mr. Igwe testifies that PWSA has conducted outreach to various community groups and  
14 stakeholders, attended meetings to present about the stormwater fee and stormwater projects, and  
15 reached a wide range of customers through these meetings.<sup>24</sup> He also testifies that PWSA  
16 reconvened its Stormwater Advisory Group; posted information on PWSA's general website and  
17 on a website dedicated to stormwater; created a video explaining the stormwater fee and  
18 stormwater challenges in Pittsburgh; intends to create a video explaining how customers are  
19 charged for stormwater service and how the fee will appear on customers' bills; intends to use  
20 social media, ongoing media relations, and presentations to community groups as part of its  
21 ongoing communications efforts; is sending letters to future stormwater-only customers; is  
22 developing a searchable website where customers can see an aerial image of their property, the

---

<sup>23</sup> PWSA St. 7-R, at 5:9-10.

<sup>24</sup> PWSA St. 7-R, at 8:22 – 10:14.

1 impervious area calculation, and ERU determination; and is developing a manual to assist  
2 customers with the credit and ERU appeals processes.<sup>25</sup>

3 **Q: What is your response to these education and outreach efforts?**

4 A: I support all of the education and outreach efforts that Mr. Igwe described.

5 **Q: Are there any lingering gaps in PWSA's education and outreach efforts regarding**  
6 **the stormwater fee?**

7 A: As I discussed in my direct testimony, I would like to see more outreach to individual  
8 customers to explain why the implementation of the stormwater fee will lead to a more equitable  
9 rate structure and to explain how stormwater costs are being moved from wastewater charges to  
10 the new stormwater fee.<sup>26</sup> A video explaining stormwater charges and how they appear on  
11 customers' bill is a good idea, but it should be supplemented by a bill insert that contains similar  
12 information and is more assured of reaching every customer. I recommend that a bill insert be  
13 included with the last PWSA bill before the stormwater fee is implemented and/or with the first  
14 PWSA bill that includes the stormwater fee. The bill insert(s) should include reader-friendly  
15 graphics and, at a minimum, explain that stormwater costs were previously included in  
16 wastewater rates, stormwater costs are being moved gradually into a new stormwater fee,  
17 wastewater rates are decreasing as a result, and the new rate structure is more equitable and fair.  
18 A graphic that compares the old and new versions of PWSA bills and shows where and how  
19 stormwater costs are included on each could be an effective component of such a bill insert.

20 Also, although I support PWSA's efforts to reach out to stakeholder and community  
21 groups itself, I continue to believe that PWSA also should consider whether to contract with

---

<sup>25</sup> PWSA St. 7-R, at 10:15 – 12:17, 13:16 – 14:5.

<sup>26</sup> See Pittsburgh United St. 2, at 28:11-18.

1 community outreach partners, particularly for individual-level outreach to low income customers  
2 and those most affected by the stormwater fee.<sup>27</sup>

3 **VI. Stormwater Infrastructure Planning**

4 **Q: Please summarize PWSA’s testimony regarding consideration of equity issues and**  
5 **benefits to low income and environmental justice communities when selecting and**  
6 **prioritizing stormwater projects?**

7 A: Mr. Igwe testifies that PWSA will consider benefits to low income and environmental  
8 justice communities, among other factors, when selecting and prioritizing stormwater projects,  
9 and that environmental justice considerations may be required by future regulatory consent  
10 decrees.<sup>28</sup> Mr. Igwe also describes PWSA’s participation in the development of a recent report  
11 titled “An Equitable Water Future: Pittsburgh” and testifies that the Stormwater Master Plan is  
12 intended to articulate clearly how PWSA will select and prioritize stormwater infrastructure  
13 projects going forward.<sup>29</sup>

14 **Q: What is your response to this testimony regarding PWSA’s efforts to incorporate**  
15 **equity considerations into its stormwater infrastructure planning?**

16 A: I support PWSA’s consideration of benefits to low income and environmental justice  
17 communities when selecting and prioritizing stormwater infrastructure projects and PWSA’s  
18 stated commitment to selecting and prioritizing stormwater projects in an equitable manner.  
19 However, in addition to the efforts that Mr. Igwe describes, I still recommend that PWSA add a  
20 criterion to its Capital Improvement Plan that requires consideration of equitable service to low  
21 income ratepayers and communities when evaluating and prioritizing capital projects.<sup>30</sup>

---

<sup>27</sup> See Pittsburgh United St. 2, at 29:3-6.

<sup>28</sup> PWSA St. 7-R, at 6:13-22.

<sup>29</sup> PWSA St. 7-R, at 6:23 – 7:10, 7:20 – 8:1.

<sup>30</sup> See Pittsburgh United St. 2, at 11:3-7.

1 Including this decision criterion in the Capital Improvement Plan itself will help ensure that  
2 equity considerations continue to be a guiding factor for PWSA when, inevitably, difficult  
3 decisions and tradeoffs have to be made in light of limited resources.

4 **Q: Does this conclude your surrebuttal testimony?**

5 A: Yes.



**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**


<b>Pennsylvania Public Utility Commission</b>	:	
	:	
v.	:	<b>Docket Nos. R-2021-3024773</b>
	:	<b>R-2021-3024774</b>
<b>Pittsburgh Water and Sewer Authority</b>	:	<b>R-2021-3024779</b>
	:	

**VERIFICATION**

I, Michele C. Adams, hereby state that the facts set forth by me in the foregoing documents:

- Pittsburgh United Statement 2, the Direct Testimony of Michele C. Adams on behalf of Pittsburgh United; and
- Pittsburgh United Statement 2-SR, the Surrebuttal Testimony of Michele C. Adams on behalf of Pittsburgh United

are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsifications to authorities).

DocuSigned by:  
  
 5BD3B53E676A442...

Michele C. Adams  
Witness on behalf of Pittsburgh United

Dated: 8/6/2021

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, <i>et al</i>	:	R-2021-3024773
	:	C-2021-3025473
v.	:	C-2021-3025516
	:	
Pittsburgh Water and Sewer Authority - Water	:	

Pennsylvania Public Utility Commission, <i>et al</i>	:	R-2021-3024774
	:	C-2021-3025471
v.	:	C-2021-3025517
	:	
Pittsburgh Water and Sewer Authority - Wastewater:	:	

Pennsylvania Public Utility Commission, <i>et al</i>	:	R-2021-3024779
	:	C-2021-3025474
v.	:	C-2021-3025521
	:	
Pittsburgh Water and Sewer Authority - Stormwater:	:	

**POST-HEARING ORDER**

Admitting Evidence Introduced  
at Evidentiary Hearing

On April 13, 2021, Pittsburgh Water and Sewer Authority (“PWSA”) filed with the Pennsylvania Public Utility Commission: (1) a water base rate case at Docket No. R-2021-3024773; (2) a wastewater base rate case at Docket No. R-2021-3024774; (3) a stormwater base rate case at Docket No. R-2021-3024779, (4) a Petition for Waiver of Statutory Definition of Fully Projected Future Test Year; and (5) a Petition for Consolidation of Water, Wastewater, and Stormwater Rate Proceedings and For Authorization to Use Combined Water, Wastewater, and Stormwater Revenue Requirements.

Pursuant to the Rate Filing, PWSA is asking the Commission for approval to increase its combined water, wastewater and stormwater rates by \$32.2 million, to be phased-in in 2022 and 2023. In particular, PWSA's Supplement No. 7 to Tariff Water – Pa. P.U.C. No. 1 proposes a rate increase that would increase PWSA's total annual operating revenues for water service by approximately \$12.6 million, or 10%, through rates effective January 12, 2022, and by approximately \$12.9 million, or 9.3%, through rates effective January 12, 2023. Next, PWSA's Supplement No. 6 Tariff Wastewater - Pa. P.U.C. No. 1 proposes a rate decrease that will reduce PWSA's total annual operating revenues for wastewater service by approximately \$7.8 million, or 10.6%, through rates effective January 12, 2022, and by approximately \$7.5 million, or 11.4%, through rates effective January 12, 2023. Finally, PWSA filed Tariff Storm Water - Pa. P.U.C. No. 1 proposing a rate increase that will raise PWSA's total annual operating revenues for stormwater service by approximately \$17.8 million through rates effective January 12, 2022, and by approximately \$5.9 million, through rates effective January 12, 2023.

On August 13, 2021, the presiding officer conducted the evidentiary hearing. During the evidentiary hearing, various parties identified and moved to admit evidence in the form of written statements and exhibits. All parties present waived the right to cross-examine the evidence. Accordingly, the evidence was marked and admitted into the hearing record by order of the presiding officer, without objection from any party.

The presiding officer directed the parties submitting evidence to electronically file the evidence with the Commission within two weeks of the date of this Post-Hearing Order along with a cover letter which notes the admission at the evidentiary hearing on August 13, 2021, and the issuance of the Post-Hearing Order.

AND NOW, having received evidence into the hearing record from PWSA, the statutory advocates and other active parties on August 13, 2021, without an objection; and

FURTHER, because the admitted evidence must be included in the hearing record for this proceeding; and

FURTHER, because no further hearing is to be scheduled in this proceeding.

THEREFORE,

IT IS ORDERED:

1. That all parties which sponsored and moved for the admission of the evidence at the evidentiary hearing conducted on August 13, 2021, shall reference this Post-Hearing Order when filing electronically (through eFile) with the Commission all of the items listed in Appendix A, attached, within 14 days of the date of this Order.

2. That any party wishing to place evidence into the hearing record, when the evidence is marked as “Confidential”, “Highly Confidential” or “Proprietary”, shall ensure the evidence is clearly marked as “Confidential”, “Highly Confidential” or “Proprietary” and shall reference this Post-Hearing Order when electronically mailing the evidence directly to the Commission’s Secretary, Rosemary Chiavetta, for inclusion in the Commission’s hearing record in a protected file.

Date: August 17, 2021

\_\_\_\_\_/s/\_\_\_\_\_  
Eranda Vero  
Administrative Law Judge

## Appendix A

### Pittsburgh Water and Sewer

#### Direct Testimony (dated 4/13/21)

- PWSA St. No. 1 - Direct Testimony of William J. Pickering – Exhibits WJP-1, WJP-2
- PWSA St. No. 2 – Direct Testimony of Edward Barca – Exhibits EB-1 to EB-10
- PWSA St. No. 3 – Direct Testimony of Tom Huestis – Appendix A, TH-1 to TH-5
- PWSA St. No. 4 – Direct Testimony of Harold Smith – Exhibits HJS-1 to HJS-4, HJS-1W to HJS-19W, HJS-1WW to HJS-18WW, HJS-1SW to HJS-9SW
- PWSA St. No. 5 – Direct Testimony of Barry King – Exhibits BK-1, BK-2
- PWSA St. No. 6 – Direct Testimony of Julie Quigley – Exhibits JAQ-1 to JAQ-6
- PWSA St. No. 7 – Direct Testimony of Tony Igwe – Appendix A, Exhibits TI-1 to TI-5
- PWSA St. No. 8 – Direct Testimony of Keith Readling – Appendix A, Exhibit KR-1

#### Supplemental Direct Testimony (dated 6/14/21)

- PWSA St. No. 2-SD – Supplemental Direct Testimony of Edward Barca
- PWSA St. No. 5-SD – Supplemental Direct Testimony of Barry King
- PWSA St. No. 7-SD – Supplemental Direct Testimony of Tony Igwe - Exhibit TI-6
- PWSA St. No. 8-SD – Supplemental Direct Testimony of Keith Readling

#### Rebuttal Testimony (dated 7/29/21 and 7/30/21)

- PWSA St. No. 1-R (rev. 7/30/21)-Rebuttal Testimony of William J. Pickering – Exhibit WJP-3
- PWSA St. No. 2-R – Rebuttal Testimony of Edward Barca – Exhibits EB-11 to EB-16
- PWSA St. No. 3-R (rev. 8/4/21) - Rebuttal Testimony of Thomas F. Huestis - Exhibits TH-6, TH-7
- PWSA St. No. 4-R - Rebuttal Testimony of Harold Smith – Exhibit HJS-1-R to HJS-3-R, HJS-1W-R to HJS-19W-R, HJS-1WW-R to HJS-18WW-R, HJS-1SW-R to HJS-9SW-R
- PWSA St. No. 5-R – Rebuttal Testimony of Barry King – Exhibits BK-3
- PWSA St. No. 6-R – Rebuttal Testimony of Julie Quigley – Exhibits JAQ-7 to JAQ-11
- PWSA St. No. 7-R – Rebuttal Testimony of Tony Igwe – Exhibit TI-7
- PWSA St. No. 8-R – Rebuttal Testimony of Keith Readling

#### Surrebuttal Testimony (dated 8/6/21)

- PWSA St. No. 2-SR - Surrebuttal Testimony of Edward Barca

#### Rejoinder Testimony (dated 8/10/21)

- PWSA St. No. 2-RJ – Rejoinder Testimony of Edward Barca – Exhibits EB-17 to EB-21
- PWSA St. No. 3-RJ - Rejoinder Testimony of Thomas F. Huestis
- PWSA St. No. 5-RJ - Rejoinder Testimony of Barry King – Exhibits BK-4 to BK-6

- PWSA St. No. 6-RJ – Rejoinder Testimony of Julie A. Quigley
- PWSA St. No. 8-RJ – Rejoinder Testimony of Keith Readling Non (**PWSA**)

### **Bureau of Investigation and Enforcement (I&E)**

#### Direct Testimony

- I&E St. No. 1 – Direct Testimony of Anthony Spadaccio – I&E Exhibit No. 1
- I&E St. No. 2 – Direct Testimony of D.C. Patel - I&E Exhibit No. 2
- I&E St. No. 3 – Direct Testimony of Ethan H. Cline – I&E Exhibit No. 3
- I&E St. No. 4 – Direct Testimony of Israel E. Gray – I&E Exhibit No. 4

#### Rebuttal Testimony

- I&E St. No. 2-R – Rebuttal Testimony of D.C. Patel

#### Surrebuttal Testimony

- I&E St. 1-SR – Surrebuttal Testimony of Anthony Spadaccio - I&E Exhibit No. 1-SR
- I&E St. No. 2-SR – Surrebuttal Testimony of D.C. Patel
- I&E St. No. 3-SR – Surrebuttal Testimony of Ethan H. Cline – I&E Exhibit No. 3-SR
- I&E St. No. 4-SR – Surrebuttal Testimony of Israel E. Gray – I&E Exhibit No. 4-SR
- Verification Statement of Anthony Spadaccio
- Verification Statement of D.C. Patel
- Verification Statement of Ethan H. Cline
- Verification Statement of Israel E. Gray

### **Office of Consumer Advocate**

#### Direct Testimony

- OCA St. No. 1 – Direct Testimony of Dante Mugrace - Schedules DM-1 to DM-20
- OCA St. No. 2 - Direct Testimony of David S. Habr - Exhibits DSH-1 through DSH-5
- OCA St. No.3 – Direct Testimony of Scott J. Rubin – Appendix A and Schedules SJR-1 to SJR-7
- OCA St. No. 4 – Direct Testimony of Roger D. Colton – Appendix A
- OCA St. No. 5 (rev. 7/23/21) – Direct Testimony of Barbara R. Alexander – Exhibits BA-1 through BA-3
- OCA St. No. 6 – Direct Testimony of Terry L. Fought – Appendix A and Exhibits TLF-1 through TLF-8
- OCA St. No. 7 – Direct Testimony of Morgan N. DeAngelo – Appendix A

#### Rebuttal Testimony

- OCA St. No. 3R – Rebuttal Testimony of Scott J. Rubin – Schedules SJR-8 through SJR-10

- OCA St. No. 4R – Rebuttal Testimony of Roger D. Colton

Surrebuttal Testimony

- OCA St. No. 1SR – Surrebuttal Testimony of Dante Mugrace
- OCA St. No. 2SR – Surrebuttal Testimony of David S. Habr
- OCA St. No. 3SR – Surrebuttal Testimony of Scott J. Rubin
- OCA St. No. 4SR – Surrebuttal Testimony of Roger D. Colton
- OCA St. No. 5SR – Surrebuttal Testimony of Barbara R. Alexander
- OCA St. No. 6SR – Surrebuttal Testimony of Terry L. Fought
- OCA St. No. 7SR – Surrebuttal Testimony of Morgan N. DeAngelo

**Office of Small Business Advocate**

Direct Testimony

- OSBA St. No. 1 – Direct Testimony of Brian Kalcic – Exhibit BK-1 (Schedules BK-1W through BK-4W; Schedules BK-1WW through BK-4WW; Schedules BK-1SW through BK-4SW), Referenced Interrogatories, an appendix and Mr. Kalcic’s signed Verification

Rebuttal Testimony

- OSBA St. No. 1-R – Rebuttal Testimony of Brian Kalcic – Exhibit BK-1R (Schedule BK-2SW Corrected; Schedule BK-4SW Corrected; Schedule BK-4WW Corrected), Referenced Interrogatories, and Mr. Kalcic’s signed Verification

Surrebuttal Testimony

- OSBA St. No. 1-S – Surrebuttal Testimony of Brian Kalcic – Exhibit BK-1S (Schedule BK-1W-S; Schedule BK-2W-S; Schedule BK-4W-S) and Mr. Kalcic’s signed Verification

R-2021-3024773, et al. - PA PUBLIC UTILITY COMMISSION v. THE PITTSBURGH  
WATER AND SEWER AUTHORITY

*Revised: August 9, 2021*

DEANNE M. O'DELL ESQUIRE  
ECKERT SEAMANS CHERIN &  
MELLOTT, LLC  
213 MARKET STREET, 8<sup>th</sup> FLOOR  
HARRISBURG PA 17101  
717.255.3744  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
Accepts eService  
(Representing PWSA)

LAUREN M BURGE ESQUIRE  
ECKERT SEAMANS CHERIN &  
MELLOTT, LLC  
600 GRANT STREET 44TH FLOOR  
PITTSBURGH PA 15219  
412.566.2146  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)  
Accepts eService  
(Representing PWSA)

GINA MILLER ESQUIRE  
PA PUC BUREAU OF  
INVESTIGATION AND ENFORCEMENT  
400 NORTH STREET  
HARRISBURG PA 17120  
717.783.8754  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)  
Accepts eService

ERIN L. GANNON ESQUIRE  
LAUREN E. GUERRA ESQUIRE  
CHRISTINE M. HOOVER ESQUIRE  
OFFICE OF CONSUMER ADVOCATE  
555 WALNUT STREET, 5<sup>th</sup> FLOOR  
FORUM PLACE  
HARRISBURG PA 17101  
717.783.5048  
[egannon@paoca.org](mailto:egannon@paoca.org)  
[lguerra@paoca.org](mailto:lguerra@paoca.org)  
[choover@paoca.org](mailto:choover@paoca.org)  
Accepts eService



RIA PEREIRA ESQUIRE  
ELIZABETH R. MARX ESQUIRE  
JOHN SWEET ESQUIRE  
LAUREN BERMAN ESQUIRE\*  
PA UTILITY LAW PROJECT  
118 LOCUST STREET  
HARRISBURG PA 17101  
717.710.3839  
[rpereirapulp@palegalaid.net](mailto:rpereirapulp@palegalaid.net)  
[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)  
[jsweetpulp@palegalaid.org](mailto:jsweetpulp@palegalaid.org)  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)  
Accepts eService  
(Representing Pittsburgh United)

ERIN FURE ESQUIRE\*  
TERESA REED WAGNER\*  
OFFICE OF SMALL BUSINESS ADVOCATE  
FORUM PLACE  
555 WALNUT STREET 1ST FLOOR  
HARRISBURG PA 17101  
717.783.2525  
[efure@pa.gov](mailto:efure@pa.gov)  
[tereswagne@pa.gov](mailto:tereswagne@pa.gov)

WHITNEY E. SNYDER ESQUIRE  
THOMAS J. SNISCAK ESQUIRE  
KEVIN J. MCKEON ESQUIRE  
HAWKE, MCKEON AND SNISCAK, LLP  
100 N 10TH STREET  
HARRISBURG PA 17101  
717.236.1300  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[kjmckeon@hmslegal.com](mailto:kjmckeon@hmslegal.com)  
Accepts eService  
(Counsel for the City of Pittsburgh)

YVONNE HILTON ESQUIRE\*  
CITY OF PITTSBURGH  
313 CITY-COUNTY BUILDING  
414 GRANT STREET  
PITTSBURGH PA 15219  
412.255.2009  
[yvonne.hilton@pittsburghpa.gov](mailto:yvonne.hilton@pittsburghpa.gov)

JOHN F. DOHERTY ESQUIRE  
LAWRENCE H. BAUMILLER ESQUIRE  
CITY OF PITTSBURGH DEPARTMENT OF LAW  
414 GRANT STREET  
313 CITY COUNTY BUILDING  
PITTSBURGH PA 15220  
412.255.2016  
[john.doherty@pittsburghpa.gov](mailto:john.doherty@pittsburghpa.gov)  
[lawrence.baumiller@pittsburghpa.gov](mailto:lawrence.baumiller@pittsburghpa.gov)  
Accepts eService

PETER DEMARCO ESQUIRE\*  
JARED J. THOMPSON ESQUIRE\*  
NATURAL RESOURCES DEFENSE COUNCIL  
1152 15TH STREET NORTHWEST, SUITE 300  
WASHINGTON DC 20005  
202.513.2267  
[pdemarco@nrdc.org](mailto:pdemarco@nrdc.org)  
[jared.thompson@nrdc.org](mailto:jared.thompson@nrdc.org)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, <i>et al</i>	:	R-2021-3024773
	:	C-2021-3025473
v.	:	C-2021-3025516
	:	
Pittsburgh Water and Sewer Authority - Water	:	

Pennsylvania Public Utility Commission, <i>et al</i>	:	R-2021-3024774
	:	C-2021-3025471
v.	:	C-2021-3025517
	:	
Pittsburgh Water and Sewer Authority - Wastewater:	:	

Pennsylvania Public Utility Commission, <i>et al</i>	:	R-2021-3024779
	:	C-2021-3025474
v.	:	C-2021-3025521
	:	
Pittsburgh Water and Sewer Authority - Stormwater:	:	

**ERRATA**

A review of the document issued in the above-captioned proceedings on August 17, 2021, revealed an error in the document. Specifically, Appendix A failed to include the evidence moved into the record at the August 13, 2021, hearing by Pittsburgh United and admitted into the record by the presiding officer. This error has been corrected with a new heading added to Appendix A listing the written, pre-served testimony submitted by Pittsburgh United along with accompanying exhibits and appendices, witness verifications, as well as the Joint Stipulation of Pittsburgh United and the Pittsburgh Water and Sewer Authority and United/PWSA Joint Stipulation Appendix A



**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission, <i>et al</i>	:	R-2021-3024773
	:	C-2021-3025473
v.	:	C-2021-3025516
	:	
Pittsburgh Water and Sewer Authority - Water	:	

Pennsylvania Public Utility Commission, <i>et al</i>	:	R-2021-3024774
	:	C-2021-3025471
v.	:	C-2021-3025517
	:	
Pittsburgh Water and Sewer Authority - Wastewater:	:	

Pennsylvania Public Utility Commission, <i>et al</i>	:	R-2021-3024779
	:	C-2021-3025474
v.	:	C-2021-3025521
	:	
Pittsburgh Water and Sewer Authority - Stormwater:	:	

**POST-HEARING ORDER**

Admitting Evidence Introduced  
at Evidentiary Hearing

On April 13, 2021, Pittsburgh Water and Sewer Authority (“PWSA”) filed with the Pennsylvania Public Utility Commission: (1) a water base rate case at Docket No. R-2021-3024773; (2) a wastewater base rate case at Docket No. R-2021-3024774; (3) a stormwater base rate case at Docket No. R-2021-3024779, (4) a Petition for Waiver of Statutory Definition of Fully Projected Future Test Year; and (5) a Petition for Consolidation of Water, Wastewater, and Stormwater Rate Proceedings and For Authorization to Use Combined Water, Wastewater, and Stormwater Revenue Requirements.

Pursuant to the Rate Filing, PWSA is asking the Commission for approval to increase its combined water, wastewater and stormwater rates by \$32.2 million, to be phased-in in 2022 and 2023. In particular, PWSA's Supplement No. 7 to Tariff Water – Pa. P.U.C. No. 1 proposes a rate increase that would increase PWSA's total annual operating revenues for water service by approximately \$12.6 million, or 10%, through rates effective January 12, 2022, and by approximately \$12.9 million, or 9.3%, through rates effective January 12, 2023. Next, PWSA's Supplement No. 6 Tariff Wastewater - Pa. P.U.C. No. 1 proposes a rate decrease that will reduce PWSA's total annual operating revenues for wastewater service by approximately \$7.8 million, or 10.6%, through rates effective January 12, 2022, and by approximately \$7.5 million, or 11.4%, through rates effective January 12, 2023. Finally, PWSA filed Tariff Storm Water - Pa. P.U.C. No. 1 proposing a rate increase that will raise PWSA's total annual operating revenues for stormwater service by approximately \$17.8 million through rates effective January 12, 2022, and by approximately \$5.9 million, through rates effective January 12, 2023.

On August 13, 2021, the presiding officer conducted the evidentiary hearing. During the evidentiary hearing, various parties identified and moved to admit evidence in the form of written statements and exhibits. All parties present waived the right to cross-examine the evidence. Accordingly, the evidence was marked and admitted into the hearing record by order of the presiding officer, without objection from any party.

The presiding officer directed the parties submitting evidence to electronically file the evidence with the Commission within two weeks of the date of this Post-Hearing Order along with a cover letter which notes the admission at the evidentiary hearing on August 13, 2021, and the issuance of the Post-Hearing Order.

AND NOW, having received evidence into the hearing record from PWSA, the statutory advocates and other active parties on August 13, 2021, without an objection; and

FURTHER, because the admitted evidence must be included in the hearing record for this proceeding; and

FURTHER, because no further hearing is to be scheduled in this proceeding.

THEREFORE,

IT IS ORDERED:

1. That all parties which sponsored and moved for the admission of the evidence at the evidentiary hearing conducted on August 13, 2021, shall reference this Post-Hearing Order when filing electronically (through eFile) with the Commission all of the items listed in Appendix A, attached, within 14 days of the date of this Order.

2. That any party wishing to place evidence into the hearing record, when the evidence is marked as “Confidential”, “Highly Confidential” or “Proprietary”, shall ensure the evidence is clearly marked as “Confidential”, “Highly Confidential” or “Proprietary” and shall reference this Post-Hearing Order when electronically mailing the evidence directly to the Commission’s Secretary, Rosemary Chiavetta, for inclusion in the Commission’s hearing record in a protected file.

Date: August 18, 2021

\_\_\_\_\_  
/s/  
Eranda Vero  
Administrative Law Judge

## Appendix A

### Pittsburgh Water and Sewer Authority

#### Direct Testimony (dated 4/13/21)

- PWSA St. No. 1 - Direct Testimony of William J. Pickering – Exhibits WJP-1, WJP-2
- PWSA St. No. 2 – Direct Testimony of Edward Barca – Exhibits EB-1 to EB-10
- PWSA St. No. 3 – Direct Testimony of Tom Huestis – Appendix A, TH-1 to TH-5
- PWSA St. No. 4 – Direct Testimony of Harold Smith – Exhibits HJS-1 to HJS-4, HJS-1W to HJS-19W, HJS-1WW to HJS-18WW, HJS-1SW to HJS-9SW
- PWSA St. No. 5 – Direct Testimony of Barry King – Exhibits BK-1, BK-2
- PWSA St. No. 6 – Direct Testimony of Julie Quigley – Exhibits JAQ-1 to JAQ-6
- PWSA St. No. 7 – Direct Testimony of Tony Igwe – Appendix A, Exhibits TI-1 to TI-5
- PWSA St. No. 8 – Direct Testimony of Keith Readling – Appendix A, Exhibit KR-1

#### Supplemental Direct Testimony (dated 6/14/21)

- PWSA St. No. 2-SD – Supplemental Direct Testimony of Edward Barca
- PWSA St. No. 5-SD – Supplemental Direct Testimony of Barry King
- PWSA St. No. 7-SD – Supplemental Direct Testimony of Tony Igwe - Exhibit TI-6
- PWSA St. No. 8-SD – Supplemental Direct Testimony of Keith Readling

#### Rebuttal Testimony (dated 7/29/21 and 7/30/21)

- PWSA St. No. 1-R (rev. 7/30/21)-Rebuttal Testimony of William J. Pickering – Exhibit WJP-3
- PWSA St. No. 2-R – Rebuttal Testimony of Edward Barca – Exhibits EB-11 to EB-16
- PWSA St. No. 3-R (rev. 8/4/21) - Rebuttal Testimony of Thomas F. Huestis - Exhibits TH-6, TH-7
- PWSA St. No. 4-R - Rebuttal Testimony of Harold Smith – Exhibit HJS-1-R to HJS-3-R, HJS-1W-R to HJS-19W-R, HJS-1WW-R to HJS-18WW-R, HJS-1SW-R to HJS-9SW-R
- PWSA St. No. 5-R – Rebuttal Testimony of Barry King – Exhibits BK-3
- PWSA St. No. 6-R – Rebuttal Testimony of Julie Quigley – Exhibits JAQ-7 to JAQ-11
- PWSA St. No. 7-R – Rebuttal Testimony of Tony Igwe – Exhibit TI-7
- PWSA St. No. 8-R – Rebuttal Testimony of Keith Readling

#### Surrebuttal Testimony (dated 8/6/21)

- PWSA St. No. 2-SR - Surrebuttal Testimony of Edward Barca

#### Rejoinder Testimony (dated 8/10/21)

- PWSA St. No. 2-RJ – Rejoinder Testimony of Edward Barca – Exhibits EB-17 to EB-21
- PWSA St. No. 3-RJ - Rejoinder Testimony of Thomas F. Huestis
- PWSA St. No. 5-RJ - Rejoinder Testimony of Barry King – Exhibits BK-4 to BK-6



- PWSA St. No. 6-RJ – Rejoinder Testimony of Julie A. Quigley
- PWSA St. No. 8-RJ – Rejoinder Testimony of Keith Readling Non (**PWSA**)

### **Bureau of Investigation and Enforcement (I&E)**

#### Direct Testimony

- I&E St. No. 1 – Direct Testimony of Anthony Spadaccio – I&E Exhibit No. 1
- I&E St. No. 2 – Direct Testimony of D.C. Patel - I&E Exhibit No. 2
- I&E St. No. 3 – Direct Testimony of Ethan H. Cline – I&E Exhibit No. 3
- I&E St. No. 4 – Direct Testimony of Israel E. Gray – I&E Exhibit No. 4

#### Rebuttal Testimony

- I&E St. No. 2-R – Rebuttal Testimony of D.C. Patel

#### Surrebuttal Testimony

- I&E St. 1-SR – Surrebuttal Testimony of Anthony Spadaccio - I&E Exhibit No. 1-SR
- I&E St. No. 2-SR – Surrebuttal Testimony of D.C. Patel
- I&E St. No. 3-SR – Surrebuttal Testimony of Ethan H. Cline – I&E Exhibit No. 3-SR
- I&E St. No. 4-SR – Surrebuttal Testimony of Israel E. Gray – I&E Exhibit No. 4-SR
- Verification Statement of Anthony Spadaccio
- Verification Statement of D.C. Patel
- Verification Statement of Ethan H. Cline
- Verification Statement of Israel E. Gray

### **Office of Consumer Advocate**

#### Direct Testimony

- OCA St. No. 1 – Direct Testimony of Dante Mugrace - Schedules DM-1 to DM-20
- OCA St. No. 2 - Direct Testimony of David S. Habr - Exhibits DSH-1 through DSH-5
- OCA St. No.3 – Direct Testimony of Scott J. Rubin – Appendix A and Schedules SJR-1 to SJR-7
- OCA St. No. 4 – Direct Testimony of Roger D. Colton – Appendix A
- OCA St. No. 5 (rev. 7/23/21) – Direct Testimony of Barbara R. Alexander – Exhibits BA-1 through BA-3
- OCA St. No. 6 – Direct Testimony of Terry L. Fought – Appendix A and Exhibits TLF-1 through TLF-8
- OCA St. No. 7 – Direct Testimony of Morgan N. DeAngelo – Appendix A

#### Rebuttal Testimony

- OCA St. No. 3R – Rebuttal Testimony of Scott J. Rubin – Schedules SJR-8 through SJR-10

- OCA St. No. 4R – Rebuttal Testimony of Roger D. Colton

Surrebuttal Testimony

- OCA St. No. 1SR – Surrebuttal Testimony of Dante Mugrace
- OCA St. No. 2SR – Surrebuttal Testimony of David S. Habr
- OCA St. No. 3SR – Surrebuttal Testimony of Scott J. Rubin
- OCA St. No. 4SR – Surrebuttal Testimony of Roger D. Colton
- OCA St. No. 5SR – Surrebuttal Testimony of Barbara R. Alexander
- OCA St. No. 6SR – Surrebuttal Testimony of Terry L. Fought
- OCA St. No. 7SR – Surrebuttal Testimony of Morgan N. DeAngelo

**Office of Small Business Advocate**

Direct Testimony

- OSBA St. No. 1 – Direct Testimony of Brian Kalcic – Exhibit BK-1 (Schedules BK-1W through BK-4W; Schedules BK-1WW through BK-4WW; Schedules BK-1SW through BK-4SW), Referenced Interrogatories, an appendix and Mr. Kalcic’s signed Verification

Rebuttal Testimony

- OSBA St. No. 1-R – Rebuttal Testimony of Brian Kalcic – Exhibit BK-1R (Schedule BK-2SW Corrected; Schedule BK-4SW Corrected; Schedule BK-4WW Corrected), Referenced Interrogatories, and Mr. Kalcic’s signed Verification

Surrebuttal Testimony

- OSBA St. No. 1-S – Surrebuttal Testimony of Brian Kalcic – Exhibit BK-1S (Schedule BK-1W-S; Schedule BK-2W-S; Schedule BK-4W-S) and Mr. Kalcic’s signed Verification

**Pittsburgh United**

Direct Testimony

- Pittsburgh United St. No. 1 - Direct Testimony of Harry Geller – Pittsburgh United Exhibit 1 - Appendices A and B.
- Pittsburgh United St. No. 2 - Direct Testimony of Michele C. Adams – Appendices A and B.

Rebuttal Testimony

- Pittsburgh United St. No. 1-R - Rebuttal Testimony of Harry Geller

Surrebuttal Testimony

- Pittsburgh United St. No. 1-SR - Surrebuttal Testimony of Harry Geller
- Pittsburgh United St. No. 2-SR - Surrebuttal Testimony of Michele C. Adams

- Verification of Pittsburgh United expert witness, Harry Geller
- Verification of Pittsburgh United expert witness, Michele C. Adams
- Joint Stipulation of Pittsburgh United and the Pittsburgh Water and Sewer Authority and United/PWSA Joint Stipulation Appendix A

R-2021-3024773, et al. - PA PUBLIC UTILITY COMMISSION v. THE PITTSBURGH  
WATER AND SEWER AUTHORITY

*Revised: August 9, 2021*

DEANNE M. O'DELL ESQUIRE  
ECKERT SEAMANS CHERIN &  
MELLOTT, LLC  
213 MARKET STREET, 8<sup>th</sup> FLOOR  
HARRISBURG PA 17101  
717.255.3744  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
Accepts eService  
(Representing PWSA)

LAUREN M BURGE ESQUIRE  
ECKERT SEAMANS CHERIN &  
MELLOTT, LLC  
600 GRANT STREET 44TH FLOOR  
PITTSBURGH PA 15219  
412.566.2146  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)  
Accepts eService  
(Representing PWSA)

GINA MILLER ESQUIRE  
PA PUC BUREAU OF  
INVESTIGATION AND ENFORCEMENT  
400 NORTH STREET  
HARRISBURG PA 17120  
717.783.8754  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)  
Accepts eService

ERIN L. GANNON ESQUIRE  
LAUREN E. GUERRA ESQUIRE  
CHRISTINE M. HOOVER ESQUIRE  
OFFICE OF CONSUMER ADVOCATE  
555 WALNUT STREET, 5<sup>th</sup> FLOOR  
FORUM PLACE  
HARRISBURG PA 17101  
717.783.5048  
[egannon@paoca.org](mailto:egannon@paoca.org)  
[lguerra@paoca.org](mailto:lguerra@paoca.org)  
[choover@paoca.org](mailto:choover@paoca.org)  
Accepts eService

RIA PEREIRA ESQUIRE  
ELIZABETH R. MARX ESQUIRE  
JOHN SWEET ESQUIRE  
LAUREN BERMAN ESQUIRE\*  
PA UTILITY LAW PROJECT  
118 LOCUST STREET  
HARRISBURG PA 17101  
717.710.3839  
[rpereirapulp@palegalaid.net](mailto:rpereirapulp@palegalaid.net)  
[emarx@pautilitylawproject.org](mailto:emarx@pautilitylawproject.org)  
[jsweetpulp@palegalaid.org](mailto:jsweetpulp@palegalaid.org)  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)  
Accepts eService  
(*Representing Pittsburgh United*)

ERIN FURE ESQUIRE\*  
TERESA REED WAGNER\*  
OFFICE OF SMALL BUSINESS ADVOCATE  
FORUM PLACE  
555 WALNUT STREET 1ST FLOOR  
HARRISBURG PA 17101  
717.783.2525  
[efure@pa.gov](mailto:efure@pa.gov)  
[tereswagne@pa.gov](mailto:tereswagne@pa.gov)

WHITNEY E. SNYDER ESQUIRE  
THOMAS J. SNISCAK ESQUIRE  
KEVIN J. MCKEON ESQUIRE  
HAWKE, MCKEON AND SNISCAK, LLP  
100 N 10TH STREET  
HARRISBURG PA 17101  
717.236.1300  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[kjmckeon@hmslegal.com](mailto:kjmckeon@hmslegal.com)  
Accepts eService  
(*Counsel for the City of Pittsburgh*)

YVONNE HILTON ESQUIRE\*  
CITY OF PITTSBURGH  
313 CITY-COUNTY BUILDING  
414 GRANT STREET  
PITTSBURGH PA 15219  
412.255.2009  
[yvonne.hilton@pittsburghpa.gov](mailto:yvonne.hilton@pittsburghpa.gov)

JOHN F. DOHERTY ESQUIRE  
LAWRENCE H. BAUMILLER ESQUIRE  
CITY OF PITTSBURGH DEPARTMENT OF LAW  
414 GRANT STREET  
313 CITY COUNTY BUILDING  
PITTSBURGH PA 15220  
412.255.2016  
[john.doherty@pittsburghpa.gov](mailto:john.doherty@pittsburghpa.gov)  
[lawrence.baumiller@pittsburghpa.gov](mailto:lawrence.baumiller@pittsburghpa.gov)  
Accepts eService

PETER DEMARCO ESQUIRE\*  
JARED J. THOMPSON ESQUIRE\*  
NATURAL RESOURCES DEFENSE COUNCIL  
1152 15TH STREET NORTHWEST, SUITE 300  
WASHINGTON DC 20005  
202.513.2267  
[pdemarco@nrdc.org](mailto:pdemarco@nrdc.org)  
[jared.thompson@nrdc.org](mailto:jared.thompson@nrdc.org)