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June 24, 2022

**Via Electronic Filing**

Rosemary Chiavetta, Secretary  
PA Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: The Pittsburgh Water and Sewer Authority's Petition for Pilot Private Service Line Leak  
Repair and Expanded Conservation Program for Low Income Customers –  
Docket No. P-2022-3030253

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Dear Secretary Chiavetta:

Enclosed for electronic filing please find The Pittsburgh Water and Sewer Authority's  
("PWSA") Prehearing Memorandum with regard to the above-referenced matter. Copies to be  
served in accordance with the attached Certificate of Service.

Sincerely,

*Sarah C. Stoner*  
Sarah C. Stoner, Esq.

SCS/lww

Enclosure

cc: Hon. Eranda Vero w/enc. (via email only)  
Hon. Gail M. Chiodo w/enc. (via email only)  
Cert. of Service w/enc. (via email only)

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PWSA's Prehearing Memorandum upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

### **Via Email Only**

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Dated: June 24, 2022

*Sarah C. Stoner*

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Sarah C. Stoner, Esq.



installation of water saving devices, including aerators, a low flow showerhead and/or a low flow toilet at a predefined, not-to-exceed cost with the potential for additional services based on further review of the specific circumstances and availability of program funds. Targeted conservation information and one-on-one assistance utilizing PWSA's conservation tools will also be provided.

On January 21, 2022, the Commission's Bureau of Investigation and Enforcement ("I&E") filed an Answer to PWSA's Petition. On January 24, 2022: (1) the Office of Consumer Advocate ("OCA") filed an Answer to PWSA's Petition; (2) the Office of Small Business Advocate ("OSBA") filed a Notice of Appearance, Notice of Intervention, Public Statement and Answer to the Petition; and (3) Pittsburgh United filed a Petition to Intervene and Answer to PWSA's Petition.

This matter was assigned to ALJs Vero and Chiodo. The Notice of Initial Call-In Telephone Prehearing Conference was issued on June 14, 2022, scheduling the prehearing conference for June 27, 2022. A Prehearing Conference Order dated June 14, 2022 directed that Prehearing Conference Memorandum be filed prior to 2:00 p.m. on June 24, 2022.

## **II. REPRESENTATION**

PWSA's attorneys in this matter are:

Karen O. Moury, Esquire  
Sarah C. Stoner, Esquire  
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Sarah Stoner is the designated primary speaker for purposes of the prehearing conference. PWSA prefers that documents be served electronically to the above email addresses and agrees to receive service of documents electronically in this proceeding. To the extent that materials are

not available electronically, PWSA requests that only one hard copy of documents, if any, be served upon Deanne O'Dell at the above mailing address.

### **III. PRESENTLY IDENTIFIED ISSUES**

As to procedural issues, in the Petition, PWSA proposed to implement the program on a pilot basis for one year beginning on or after January 2, 2023 (subject to Commission approval) and requested that the Commission issue an order granting the Petition on or before its September 15, 2022 public meeting. Given PWSA's go-live date for implementation of an SAP billing system and the volume of expected internal projects and resources that will be needed to effectuate PWSA's Compliance Plan Stage 2 Customer Services settlement, PWSA withdraws its request to have the Commission act on the Petition at the Commission's September 15, 2022 public meeting date.

Substantive issues in the proceeding may include issues pertaining to the following topics:

- Eligibility for the Pilot Program
- Services to be offered under the Pilot Program
- Process for providing services under the Pilot Program
- Education and outreach efforts for the Pilot Program
- Budget for the Pilot Program
- PWSA's request to track Pilot Program costs as a regulatory asset and seek cost recovery in its next base rate filing

### **IV. WITNESSES**

PWSA is still in the process of identifying its witnesses but, at a minimum, anticipates that it will present the testimony of Julie A. Mechling, Director of Customer Service. Her

address is 1200 Penn Avenue, Pittsburgh, PA 15222. All of the issues to be addressed in this proceeding are expected to be within Ms. Mechling’s area of expertise and knowledge.

PWSA reserves its right to add additional witnesses or change the identity of its witnesses at any time upon appropriate notice to the Presiding Officers and the parties.

**V. PROCEDURAL SCHEDULE**

PWSA proposes the following litigation schedule:

<b><u>Event</u></b>	<b><u>Proposal</u></b>
Prehearing Conference	June 27, 2022
PWSA Direct Testimony	August 12, 2022
Service of written rebuttal testimony	September 13, 2022
Service of written surrebuttal testimony	October 4, 2022
Rejoinder Outline or Testimony	October 31, 2022
Witness matrix listing the parties intending to cross-examine each witness and the extent of any cross-examination	November 4, 2022
<b><u>Technical evidentiary hearings</u></b>	<b><u>Week of November 7, 2022</u></b>
Filing and service of main briefs	December 1, 2022
Filing and service of reply briefs or submission of joint settlement petition executed by representatives of parties thereto, together with all parties’ statements in support of joint petition/settlement	December 20, 2022

Under the proposed schedule, all dates are in-hand delivery, and electronic mail for receipt and distribution will satisfy in-hand service dates.

**VI. DISCOVERY**

While it would not appear necessary to adopt rules to shorten discovery response times, PWSA is willing to discuss any proposed discovery modifications and encourages the use of informal discovery to expedite the discovery process. PWSA will establish a cloud-based, secure site for the assistance of the parties in handling discovery. Discovery responses including attachments will be available at the ESCM Share File site. For a party to receive access, please contact Sarah C. Stoner (sstoner@eckertseamans.com or 717-237-6026) and provide the name and email address of the person seeking access.

**VII. SETTLEMENT**

PWSA is willing to discuss the settlement of any or all aspects of this proceeding.

Respectfully submitted,

*Sarah C. Stoner*

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Dated: June 24, 2022

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