

July 11, 2022

**Via Electronic Filing**

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

Re: Pittsburgh Water and Sewer Authority Long-Term Infrastructure Improvement Plan  
Docket Nos. P-2018-3005037 (water) and P-2018-3005039 (wastewater)

Annual Asset Optimization Plan for Pittsburgh Water and Sewer Authority  
Docket Nos. M-2022-3031146 (water) and M-2022-3031147 (wastewater)

Dear Secretary Chiavetta:

**The purpose of this letter is to request an extension of time until October 6, 2022 to comply with the directives of the Commission in its May 27, 2022 Secretarial Letters** addressing the Annual Asset Optimization Plans (“AAOP”) of The Pittsburgh Water and Sewer Authority’s combined water and wastewater Long-Term Infrastructure Plan (“LTIP”) <sup>1</sup> at Docket Nos. M-2022-3031146 (water) and M-2022-3031147 (wastewater). (“*May 27, 2022 Sec Letters*”). The *May 27, 2022 Sec Letters* directed PWSA to either: (1) file a petition for modification of its LTIP; (2) file a new LTIP; or, (3) withdraw its LTIP. <sup>2</sup> The Commission directed PWSA to take action within 60 days of the date of the *May 27, 2022 Sec Letters* or July 26, 2022.

PWSA will proceed either under option 1 (modification) or option 2 (new filing). However, to do either of these options, additional time is necessary to enable PWSA to comply with the Commission’s directives that the changes be made to “clearly outline its projected expenditures and eligible property replacements for the remainder of its LTIP term.” <sup>3</sup>

Granting the requested extension of time better aligns with PWSA’s internal planning processes to finalize an updated Capital Improvement Plan (“CIP”) which is anticipated to be completed at the end of September 2022. PWSA’s CIP includes detailed information about PWSA’s construction projects including those that are eligible to be included in the LTIP. The CIP process begins each year in the second quarter when project nominations are solicited from the entire organization. Over the subsequent months, PWSA’s department group managers screen and evaluate the nominated projects

---

<sup>1</sup> PWSA’s LTIP was approved by Commission Orders entered August 27, 2020 at Docket Nos. P-2018-3005037 (water) and P-2018-3005039 (wastewater).

<sup>2</sup> *May 27, 2022 Sec Letters* at 4.

<sup>3</sup> *May 27, 2022 Sec Letters* at 4.

and recommend which projects should be considered for future planning, design or construction. Once identified, an updated CIP is presented to PWSA's Board of Directors for approval. By extending the filing date for PWSA's filing regarding its LTIP until after the CIP is finalized, PWSA will be able to rely on the most updated and current information about future projects which can be included in the LTIP. As such, the LTIP filing to be made under the *May 27, 2022 Sec Letters* will reflect the most up-to-date and reasonable expectations of the projects, their costs, and the feasibility of their completion to address the concern expressed in the *May 27, 2022 Sec Letters*.

The more accurate alignment of PWSA's projects with actual expenditures has been difficult previously due to a number of factors that PWSA is hoping can be addressed through the LTTIP filing which can be developed on the most current CIP. As PWSA explained in response to data requests, PWSA's LTIP was filed in 2018 and based on the then-current CIP. Approval of the LTIP did not occur for two years and the AAOP addressed by the *May 27, 2022 Sec Letters* is PWSA's first Commission filed AAOP. Apart from the operational and other PWSA changes that have occurred since 2018 due to PWSA's transition to Commission jurisdiction, the onset of the COVID-19 pandemic in FY 2020 impacted PWSA's construction schedules including the directed stop of all non-essential construction that lasted until May 2020. Construction operations have not recovered to pre-pandemic levels due to supply chain and contractor staffing shortages.

Given the overarching concern expressed in the *May 27, 2022 Sec Letters* about a misalignment between PWSA's projected and actual expenditures, the other factors outside of PWSA's control impacting these issues and PWSA's current internal process to update its CIP, PWSA submits that an extension of time is appropriate and reasonable to enable PWSA to present most updated and current information so that PWSA's LTIP filing will more accurately align its projections with actual project spends going forward.

For all these reasons, PWSA requests that the Commission grant it an extension of time to comply with the above-described LTIP filing directive until October 6, 2022.

Sincerely,

*/s/ Carl R. Shultz*

Carl R. Shultz, Esquire

CRS/dmo

cc: Patricia Wiedt, Esquire (via [pwiedt@pa.gov](mailto:pwiedt@pa.gov))  
Dan Searfoorce, Technical Utility Services (via [dsearfoorc@pa.gov](mailto:dsearfoorc@pa.gov))  
John Van Zant, Technical Utility Services (via [jvanzant@pa.gov](mailto:jvanzant@pa.gov))  
Ken Shaffer, Technical Utility Services (via [kennshaffe@pa.gov](mailto:kennshaffe@pa.gov))  
Cert. of Service (via email)

## CERTIFICATE OF SERVICE

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

### Via Email Only

Patrick Cicero, Esq.  
Christine Maloni Hoover, Esq.  
Office of Consumer Advocate  
555 Walnut St., 5<sup>th</sup> Fl., Forum Place  
Harrisburg, PA 17101-1923  
[pcicero@paoca.org](mailto:pcicero@paoca.org)  
[choover@paoca.org](mailto:choover@paoca.org)

Office of Small Business Advocate  
Forum Place Building  
555 Walnut Street, 1st Floor  
Harrisburg, PA 17101  
[tereswagne@pa.gov](mailto:tereswagne@pa.gov)

Richard Kanaskie, Esq.  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North St., 2<sup>nd</sup> Floor West  
Harrisburg, PA 17120  
[rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

Paul T. Diskin, Director  
PA Public Utility Commission  
Bureau of Technical Utility Services  
400 North Street, 3 West  
Harrisburg, PA 17120  
[pdiskin@pa.gov](mailto:pdiskin@pa.gov)

Dated: July 11, 2022

/s/ *Carl R. Shultz*

---

Carl R. Shultz, Esq.