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September 30, 2022

**Via Electronic Filing**

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

Re: John Kerr Musgrave, IV v. Pittsburgh Water and Sewer Authority  
Docket No. C-2020-3020714

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Dear Secretary Chiavetta:

Enclosed for electronic filing please find a Joint Stipulation of Facts with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

*/s/ Lauren M. Burge*

Lauren M. Burge

Enclosure

Cc: Cert. of Service w/enc.

## **CERTIFICATE OF SERVICE**

I hereby certify that this day I served a copy of the Joint Stipulation of Facts upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

### **Via Email Only**

John Kerr Musgrave, IV  
6059 Bunkerhill Street  
Pittsburgh, PA 15206-1155  
[jmusky@earthlink.net](mailto:jmusky@earthlink.net)

Hon. Emily I. DeVoe  
Administrative Law Judge  
PA Public Utility Commission  
Piatt Place, Suite 220  
301 5<sup>th</sup> Avenue  
Pittsburgh, PA 15222  
[edevoe@pa.gov](mailto:edevoe@pa.gov)

Dated: September 30, 2022

/s/ *Lauren M. Burge*  
Lauren M. Burge, Esq.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

John Kerr Musgrave, IV,	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2020-3020714
	:	
The Pittsburgh Water and Sewer Authority,	:	
Respondent.	:	
	:	

**JOINT STIPULATION OF FACTS OF  
THE PITTSBURGH WATER AND SEWER AUTHORITY  
AND JOHN KERR MUSGRAVE, IV**

The Pittsburgh Water and Sewer Authority (“PWSA” or the “Authority”) and John Kerr Musgrave, IV (“Complainant”) hereby stipulate to the following facts in the above-referenced proceeding.

**I. Breaks in Water Service Line Serving 6059 Bunkerhill Street<sup>1</sup>**

- A. The parties stipulate that breaks in the shared water service line serving the 6059 Bunkerhill Street property occurred on the following dates:
  - 1. On or around January 22-January 24, 2018; and
  - 2. July 27, 2020.
- B. When the breaks identified in Section I.A occurred, the property owners hired a private plumber to make repairs to the water service line.
- C. The parties stipulate that the 6-inch water main serving Bunkerhill Street experienced breaks on the following dates:
  - 1. April 26, 2020;
  - 2. June 2, 2020;
  - 3. June 28, 2020;

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<sup>1</sup> The parties recognize that PWSA’s records are minimal and may be incomplete. From PWSA’s perspective, this is because the water line at issue is a private service line. The items agreed to here are supported by PWSA’s records.

4. July 13, 2020; and
5. July 27, 2020.

## **II. Curb Box Locations<sup>2</sup>**

The parties stipulate to the following facts regarding the location of curb boxes on Bunkerhill Street:

1. Attachment A shows the approximate curb box locations prior to the line replacement in November 2020, for properties except 6053, 6055 and 6059 Bunkerhill;
2. Attachment B shows approximate curb box locations prior to the line replacement in November 2020, specifically for the properties at 6053, 6055, and 6059 Bunkerhill Street (as a supplement to Attachment A); and
3. Attachment C shows the approximate current curb box and meter crock locations after the line replacement in November 2020.

## **III. Other Facts**

1. As of March 14, 2018, the properties at 6041, 6045, and 6049 Bunkerhill Street separated themselves from the shared water service line (or “party” line).

Respectfully submitted,

/s/ John Kerr Musgrave, IV  
John Kerr Musgrave, IV  
6059 Bunkerhill Street  
Pittsburgh, PA 15206  
[jmusky@earthlink.net](mailto:jmusky@earthlink.net)

*Complainant*

/s/ Lauren M. Burge  
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Dated: September 30, 2022

*Counsel for PWSA*

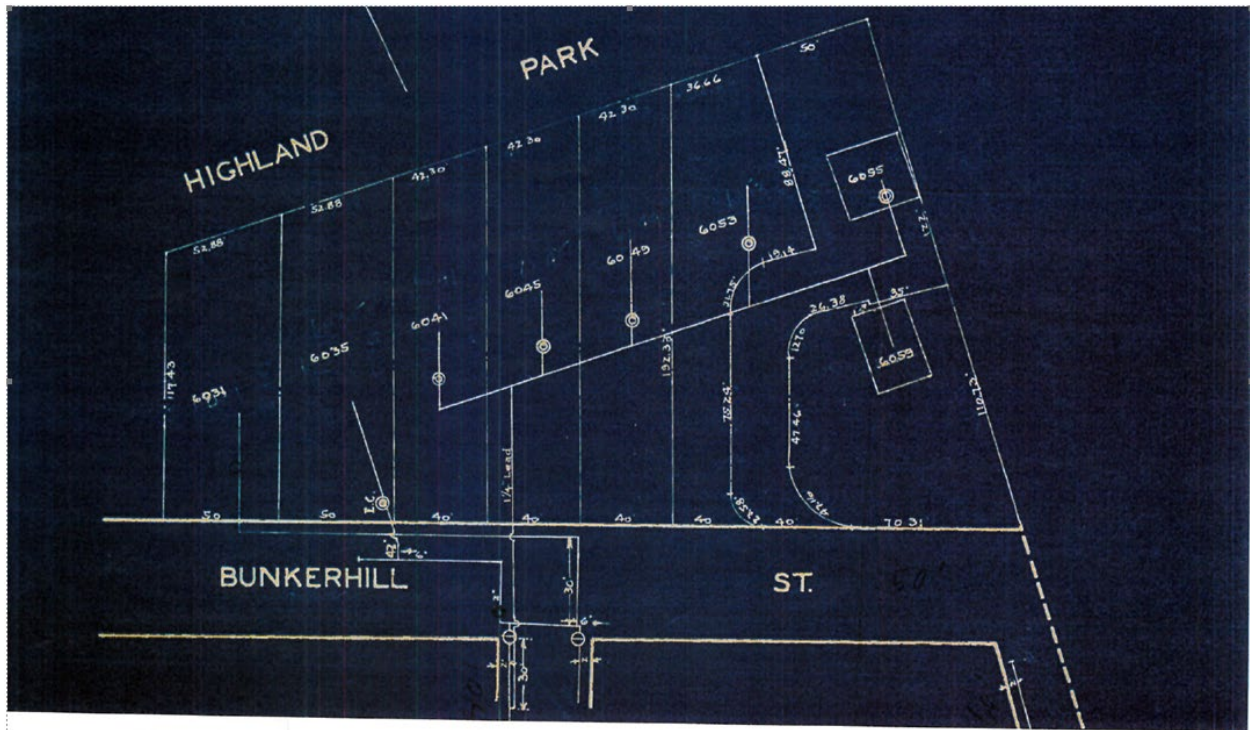
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<sup>2</sup> The parties recognize that PWSA’s records are minimal and may be incomplete. From PWSA’s perspective, this is because the water line at issue is a private service line. The items agreed to here are supported by PWSA’s records.

**Joint Stipulation of Facts  
Attachment A**

The map below shows approximate curb box locations on the shared water service line on Bunkerhill Street prior to the water line replacement in November 2020 for the properties except 6053, 6055, and 6059 Bunkerhill.

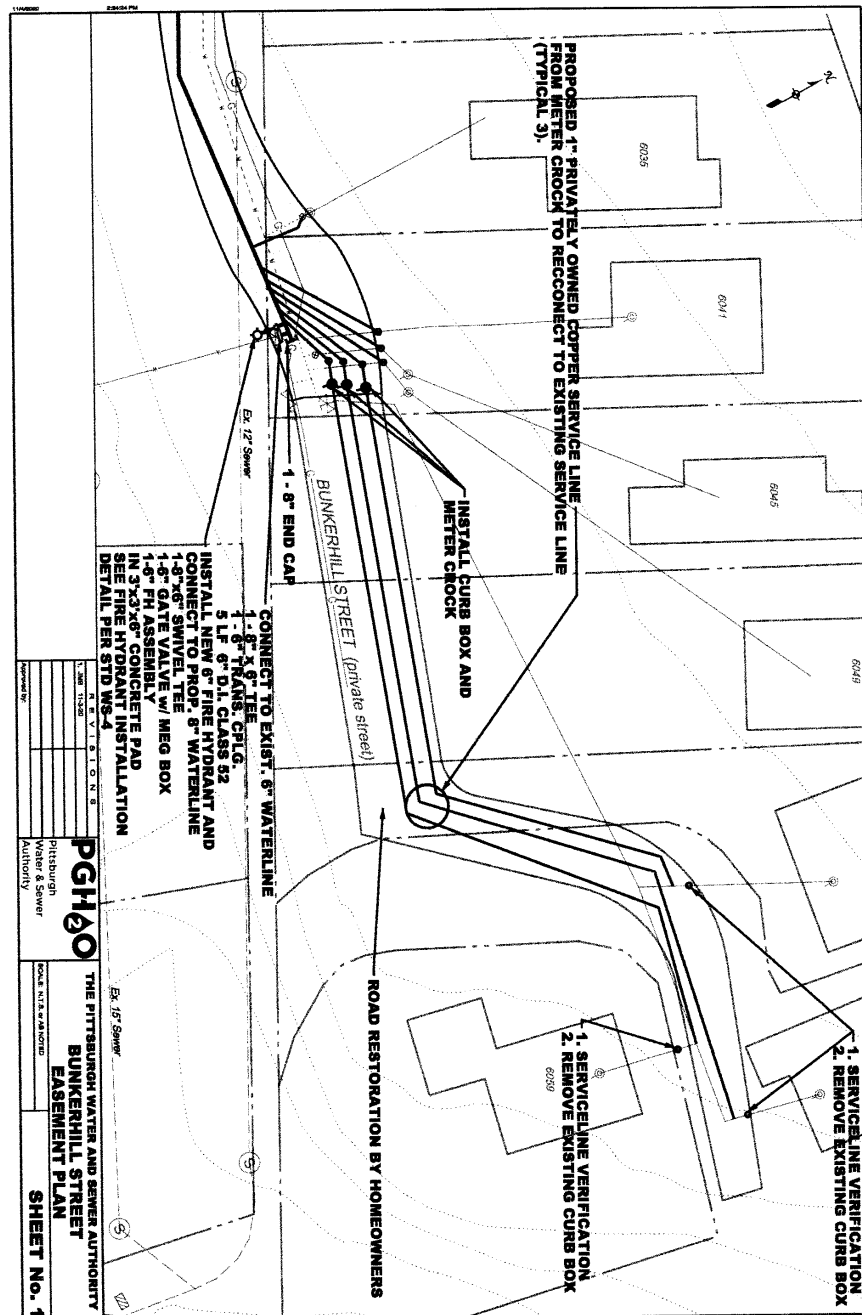
The circles shown on the map indicate approximate curb box locations. The parties note that this map is a rendering providing general locations of the curb boxes, not exact GPS locations. Additionally, PWSA's records may be incomplete. From PWSA's perspective, this is because the line at issue is a private water service line.



# Joint Stipulation of Facts Attachment B

The map below shows approximate curb box locations on the shared water service line on Bunkerhill Street prior to the water line replacement in November 2020, specifically for the properties at 6053, 6055, and 6059 Bunkerhill Street (as a supplement to Attachment A above).

The black circles shown on the map indicate approximate curb box locations for these properties prior to November 2020. The parties note that this map is a rendering providing general locations of the curb boxes, not exact GPS locations. Additionally, PWSA's records may be incomplete. From PWSA's perspective, this is because the line at issue is a private water service line.



## Joint Stipulation of Facts Attachment C

The map below shows the approximate current curb box and meter crock locations on Bunkerhill Street after the shared water service line replacement in November 2020.

The purple circles shown on the map indicate approximate curb box locations, and the blue circles indicate approximate meter crock locations. The parties note that this map is a rendering providing general locations of the curb boxes and meter crocks, not exact GPS locations. Additionally, PWSA's records may be incomplete. From PWSA's perspective, this is because the line at issue is a private water service line.

