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March 19, 2024

**Via Electronic Filing**

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

Re: Petition of The Pittsburgh Water and Sewer Authority for Approval of its Lead Service Line Replacement Program – Docket No. P-2024-3046468

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Dear Secretary Chiavetta:

Enclosed for electronic filing please find The Pittsburgh Water and Sewer Authority's ("PWSA") Revised Page 22 of its proposed Lead Service Line Replacement ("LSLR") Plan, which was originally filed on February 15, 2024 as Appendix A to PWSA's Petition for Approval of its Lead Service Line Replacement ("LSLR") Program. Clean and redline versions of the Revised Page 22 are attached.

Page 22 of the originally filed LSLR Plan inadvertently indicated that PWSA would use measurements exceeding 15 parts per billion ("ppb") of lead as an indicator of elevated lead levels triggering certain actions. In fact, PWSA intends to use measurements exceeding 10 ppb for these purposes, which is consistent with PWSA's current practices. PWSA is submitting Revised Page 22 to clarify that it is not proposing any change to its existing practices regarding these measurements and related actions.

Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

*Sarah C. Stoner*  
Sarah C. Stoner

SCS/lww  
Enclosure  
cc: Cert. of Service w/enc.

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of **PWSA's Revised Page 22 of its Proposed LSLR Plan** upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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Dated: March 19, 2024

*Sarah C. Stoner*

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Sarah C. Stoner, Esq.

a minimum of a 6-hour stagnation period. The test kit includes written instructions for collection of the samples, a link to a video that describes the sampling process, and a chain of custody where the customer and address information are pre-populated to reduce errors in the process.

Once the results are available from the laboratory, they are mailed to the customer within 30 days of PWSA receiving the results. If the results exceed ~~1015~~ ppb, the customer is informed as soon as practical after PWSA knows of the result, but no later than 3 calendar days after PWSA is aware of the results. The communication consists of the Lead Help Desk calling the customer to inform them of the results (results are also mailed to the customer), as well as measures they can take to reduce their exposure to lead in drinking water (including the continued use of the filtering water pitcher). The customer is provided with a new filtering water pitcher (with another 6-months of filtering capacity) and another sample kit is provided about 3 months after the initial post-construction sample kit was provided. If that test result exceeds 10 ppb, PWSA will assist the property owner in determining why elevated lead levels remain.

If the result is 50 ppb or higher, in addition to the action taken in the preceding paragraph, PWSA will offer to deliver a case of bottled water per day until a meter drop and flush is completed by PWSA. The water will be retested about 2 weeks after the meter drop and flush to determine the effectiveness of the flushing procedure.

### 3.5 Plan to Replace Remaining Lead Service Lines

PWSA has a goal to replace all remaining residential lead service lines in the system by the end of 2026. As efforts continue to refine the service line material inventory, and to understand where the remaining lead is located, that goal is being evaluated.

Notwithstanding PWSA's goal for replacing residential lead services lines in its system by the end of 2026, PWSA plans to replace all lead service lines, whether PWSA-owned or customer-owned, within its water distribution system as required by the PUC's regulations at 52 Pa. Code § 65.53.

#### 3.5.1 LSLR Programs

PWSA will continue to use a variety of Programs to complete the LSLR work, with the primary programs being the Neighborhood LSLR Projects, the SDWMR Projects and Emergency/Urgent LSLR. Each is described below.

##### *Neighborhood LSLR*

As previously described, PWSA conducted Neighborhood LSLR projects in 2017, 2018, 2019, 2022, 2023 and is planning for 2024. Since 2019, these projects have been funded by PENNVEST or by American Recovery Plan Act funds, and the magnitude of each has typically been dictated by the availability of this outside funding. This approach for the Neighborhood LSLR program will continue in the future.

In the Lead Infrastructure Plan prepared in 2020, PWSA envisioned completing most of the remaining LSLR through the SDWMR Program, with the potential need for a Neighborhood LSLR project to finish the work in 2025 or 2026. With the availability of the funding described above,

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