

Sarah C. Stoner
717.237.6026
sstoner@eckertseamans.com

November 20, 2024

Via Email

Honorable Alphonso Arnold III
Honorable Steven K. Haas
Administrative Law Judge
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120
alphonarno@pa.gov
sthaas@pa.gov

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

Petition of The Pittsburgh Water and Sewer Authority for Waiver of Certain Regulations Regarding its Lead Service Line Replacement Program; Docket No. P-2024-3046465

Dear Judge Arnold and Judge Haas:

Pursuant to the Interim Order Holding Proceedings in Abeyance issued on April 30, 2024, please find enclosed the Third Joint Status Report of the parties to The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water's ("Pittsburgh Water") Lead Service Line Replacement Plan proceeding and accompanying Petition for Waiver proceeding. The Third Joint Status Report is being submitted on behalf of Pittsburgh Water, the Pennsylvania Office of Consumer Advocate, and Pittsburgh United Our Water Table (collectively, the "Parties"). In the Third Joint Status Report, the Parties respectfully request that the proceedings continue to be held in abeyance as the Parties continue to discuss settlement of the matters. The Parties respectfully request an additional thirty (30) days to facilitate ongoing settlement discussions and propose to file a fourth Joint Status Report on the status of settlement discussions on or before Friday, December 20, 2024.

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

Sincerely,

Sarah C. Stoner

Sarah C. Stoner

Enclosure

cc: Rosemary Chiavetta, Secretary (w/ enc.)
Cert. of Service (w/enc.)

CERTIFICATE OF SERVICE

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

Via Email Only

Harrison W. Breitman, Esq.
Office of Consumer Advocate
555 Walnut St., 5th Fl., Forum Place
Harrisburg, PA 17101-1923
HBreitman@paoca.org

Lauren N. Berman, Esq.
John W. Sweet, Esq.
Ria M. Pereira, Esq.
Elizabeth R. Marx, Esq.
The Pennsylvania Utility Law Project
118 Locust St.
Harrisburg, PA 17101
pulp@pautilitylawproject.org

Sarah C. Stoner

Sarah C. Stoner, Esq.

Dated: November 20, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of The Pittsburgh Water and Sewer Authority for Approval of its Lead Service Line Replacement Program	:	Docket No. P-2024-3046468
	:	
	:	
Petition of The Pittsburgh Water and Sewer Authority for Waiver of Certain Regulations Regarding its Lead Service Line Replacement Program	:	Docket No. P-2024-3046465
	:	
	:	

**THIRD JOINT STATUS REPORT OF THE PITTSBURGH WATER AND SEWER
AUTHORITY, THE PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE AND
PITTSBURGH UNITED OUR WATER TABLE**

The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water (“Pittsburgh Water”) submits the following Third Joint Status Report pursuant to the Interim Order Holding Proceedings in Abeyance issued on April 30, 2024 (“Interim Order”), issued by Administrative Law Judges Steven K. Haas and Alphonso Arnold III (“ALJs”) in the above referenced matters. Pittsburgh Water has been authorized to present this Third Joint Status Report on its behalf as well as on behalf of the Pennsylvania Office of Consumer Advocate (“OCA”) and Pittsburgh United Our Water Table (“Pittsburgh United”) (collectively, the “Parties”).

I. PROCEDURAL HISTORY

The ALJs assigned to Pittsburgh Water’s Petition for Approval of its Lead Service Line Replacement Program and its Petition for Waiver of Certain Regulations Regarding its Lead Service Line Replacement Program, issued an Interim Order directing that the Parties file a Joint Status Report informing the ALJs of the status of settlement discussions between the Parties, and proposing the next procedural step to be taken in the consolidated matters by September 20, 2024. Pittsburgh Water submitted a Joint Status Report on behalf of the Parties on September 20, 2024, and requested an additional thirty (30) days to facilitate ongoing settlement

discussions. Pittsburgh Water submitted a Second Joint Status Report on October 21, 2024, and requested an additional thirty (30) days to facilitate ongoing settlement discussions.

II. STATUS REPORT

Pittsburgh Water has conferred with OCA and Pittsburgh United to discuss potential settlement of these matters and Pittsburgh Water is reviewing a counter settlement term sheet prepared by OCA and Pittsburgh United. The Parties request an additional thirty (30) days to facilitate ongoing settlement discussions and propose to file a fourth Joint Status Report on the status of settlement discussions on or before Friday, December 20, 2024.

III. CONCLUSION

WHEREFORE, The Pittsburgh Water and Sewer Authority, the Pennsylvania Office of Consumer Advocate, and Pittsburgh United Our Water Table hereby jointly request that the ALJs accept this Joint Status Report as the Parties continue to work towards a settlement and direct that a fourth Joint Status Report be due on or before Friday, December 20, 2024.

Respectfully submitted,

Sarah C. Stoner

Daniel Clearfield, Esq. (PA I.D. No. 26183)
Deanne M. O'Dell, Esq. (PA I.D. No. 81064)
Sarah C. Stoner, Esq. (PA I.D. No. 313793)
Lauren M. Burge, Esq. (PA I.D. No. 311570)
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
717.237.6000
717.237.6019 (fax)
dclearfield@eckertseamans.com
dodell@eckertseamans.com
sstoner@eckertseamans.com
lburge@eckertseamans.com

Dated: November 20, 2024

*Counsel for
The Pittsburgh Water and Sewer Authority*