



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

June 9, 2025

Docket No. R-2025-3055010
Utility Code 2220554

DEANNE M ODELL ESQUIRE
ECKERT SEAMANS CHERIN & MELLOTT LLC
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RE: The Pittsburgh Water and Sewer Authority Supplement No. 16 Tariff Water – Pa. P.U.C.
No. 1 at Docket No. R-2025-3055010

Dear Attorney O’Dell:

On June 4, 2025, The Pittsburgh Water and Sewer Authority (PWSA) filed the above-captioned document (Tariff Supplement Filing) with the Pennsylvania Public Utility Commission (Commission). For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

Please forward the information to the Secretary of the Commission at the address listed below **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary’s Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary’s Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Please note your answers must be verified per 52 Pa. Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature _____
Title _____
Date _____

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the review, please send a copy of the response to Paul Zander, in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at pzander@pa.gov. Please also direct any questions to Paul Zander at telephone number (717) 783-1372. Thank you in advance for your cooperation.

Sincerely,



Matthew L. Homsher
Secretary

Enclosure: TUS Data Request Set 1

cc: Darryl Lawrence, Office of Consumer Advocate (w/enclosure), ra-oca@paoca.org
Melanie El Atieh, Office of Consumer Advocate (w/enclosure), melatieh@paoca.org
NazAarah Sabree, Office of Small Business Advocate (w/enclosure), ra-sba@pa.gov
Rebecca Lyttle, Office of Small Business Advocate (w/enclosure), relyttle@pa.gov
Allison Kaster, Bureau of Investigation & Enforcement (w/enclosure), akaster@pa.gov

TUS Data Request Set 1

The Pittsburgh Water and Sewer Authority Supplement No. 16 Tariff Water – Pa. P.U.C. No. 1
at Docket No. R-2025-3055010

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

- R-1. Ordering Paragraph 6 of the Commission’s Order entered January 18, 2024, for PWSA’s last base rate case at Docket No. R-2023-3039919 (January 2024 Order) directed that prior to or in conjunction with PWSA’s first tariff or tariff supplement filing to incorporate a PENNVEST loan into PWSA’s PENNVEST Charge (PVC), PWSA shall revise its PVC to propose any rate changes necessary to modify the PVC formula definitions for “Consumption” and “Conveyance” to include estimated consumption for unmetered customers and to impose flat rate charges and credits for unmetered customers based on estimated consumption. Also, Ordering Paragraph 8 of the Commission’s January 2024 Order directed that upon review of the supporting data submitted by PWSA, the Commission or its designee (i.e., the Bureau of Technical Utility Services) will notify PWSA by Secretarial Letter of any deficiency in PWSA’s submission; that upon notice of a deficiency in the supporting data as filed, PWSA shall rectify any deficiencies within ten business days; and that a tariff or tariff supplement not accompanied by required data or otherwise deemed deficient will be rejected unless the Commission, by Order and for good cause shown, allows the tariff or tariff supplement to be filed. While PWSA’s Tariff Supplement Filing incorporates loans into PWSA’s PVC, PWSA did not provide the required rate changes identified in Ordering Paragraph 6 of the January 2024 Order. Please provide responses for each of the following:
- a. Explain why PWSA did not propose rate changes to modify the PVC formula definition for “Consumption” to include estimated consumption for unmetered customers;
 - b. Explain why PWSA did not propose rate changes to impose flat rate charges and credits for unmetered customers based on estimated consumption;
 - c. Provide evidence of whether PWSA rectified these deficiencies within ten business days of the date of this Secretarial Letter; and
 - d. If PWSA did not rectify these deficiencies within ten business days of the date of this Secretarial Letter, demonstrate that PWSA has shown good cause to allow the proposed tariff supplement to be filed with the Commission without the required data. Please note that failure to provide the required data may result in rejection of the Tariff Supplement Filing.
- R-2. While the Tariff Supplement Filing included PENNVEST loans in PWSA’s PVC, PWSA did not provide the required data identified in Ordering Paragraph 7 of the January 2024 Order. For each PENNVEST loan that PWSA proposed to incorporate into its PVC, please provide responses for each of the following:
- a. A summary of the terms of the loan, including the loan date, amount, interest rates, term of loan, annual principal and interest payments, and security certificate

TUS Data Request Set 1

The Pittsburgh Water and Sewer Authority Supplement No. 16 Tariff Water – Pa. P.U.C. No. 1
at Docket No. R-2025-3055010

docket number. The date of each expected interest rate or annual principal and interest payment change must be identified for each loan;

- b. Copies of executed loan agreement documents and final amortization schedules;
 - c. A statement that the project funded by the loan is used and useful;
 - d. A copy of a proof of revenues and supporting calculations for the affected type of service reflecting PVC revenues under present and proposed rates;
 - e. Copies of any supporting documentation used to determine the PVC, including electronic working papers;
 - f. A copy of PWSA's customer notice that it issued in accordance with the January 2024 Order Settlement's Paragraph 9.A.3.b.ii.(a) and 52 Pa. Code § 53.45(g);
 - g. A copy of PWSA's affidavit of customer notice confirming that notice requirements have been met in accordance with 52 Pa. Code § 53.45(h);
 - h. Provide evidence of whether PWSA rectified these deficiencies within ten business days of the date of this Secretarial Letter; and
 - i. If PWSA did not rectify these deficiencies within ten business days of the date of this Secretarial Letter, demonstrate that PWSA has shown good cause to allow the proposed tariff supplement to be filed with the Commission without the required data. Please note that failure to provide the required data may result in rejection of the Tariff Supplement Filing.
- R-3. The Tariff Supplement Filing's Statement No. 8, Exhibit JAM-14 included a copy of PWSA's proposed Supplement No. 16 Tariff Water – Pa. P.U.C. No. 1 (Supplement No. 16). Supplement No. 16, Page 8C indicated that PWSA's PVC is subject to change on a semi-annual basis based on the status of applicable PENNVEST loans and that supporting data for each semi-annual update will be provided. Please provide responses for each of the following:
- a. Provide PWSA's proposed format and content for supporting data for semi-annual update filings with the Commission;
 - b. Provide examples of supporting data for the first and second semi-annual update filings after Supplement No. 16's effective date, including electronic working papers; and
 - c. Explain how PWSA would determine the value for Consumption for semi-annual update filings.

TUS Data Request Set 1

The Pittsburgh Water and Sewer Authority Supplement No. 16 Tariff Water – Pa. P.U.C. No. 1
at Docket No. R-2025-3055010

- R-4. Supplement No. 16, Page 8D indicated that the PVC will be subject to annual reconciliation based on actual consumption for the prior 12 months ending December 31, and that the PVC will be adjusted to reflect either a credit or an increase in the charge. Please provide responses for each of the following:
- a. Provide PWSA’s proposed format and content for supporting data for annual reconciliation filings with the Commission;
 - b. Provide an example of supporting data for the first annual reconciliation filing after Supplement No. 16’s effective date, including electronic working papers;
 - c. Explain whether PWSA intends for the annual reconciliation filing to provide for the recovery or recoupment of the difference between PVC revenue and PI costs for the reconciliation period, notwithstanding whether that difference is based on changes to PI, Consumption, or any net reconciliation refund or recoupment; and
 - d. Explain how PWSA will incorporate annual reconciliation procedures into its PVC formula (e.g., a separate “e” factor or a modified definition for PI to address these amounts, amounts will be calculated as a percentage amount or fixed/flat dollar value rounded to two decimal places, etc.).
- R-5. PWSA’s response for 52 Pa. Code § 53.52(b)(3) included a water revenue proof that identified 2026 revenue at existing rates of \$161,273,257. However, the water revenue proof included in the Tariff Supplement Filing’s Statement No. 8, Exhibit HJS-17W identified 2026 revenue at existing rates of \$162,521,898. This difference also affects revenue increase calculations in the Tariff Supplement Filing’s Statement No. 1, Exhibit WJP-1, where the 2026 rate increase is calculated as \$65,522,218, rather than the \$63.7 million identified Statement No. 1, Page 3, or PWSA’s response for Filing Requirement II.2. Please confirm that Exhibit HJS-17W includes the correct calculation of water revenues at existing rates, and that PWSA will amend Exhibit WJP-1 and/or Exhibit HJS- in rebuttal to use the same value as HJS-17W for 2026 revenue at existing rates.
- R-6. In the Tariff Supplement Filing’s Statement No. 6, Page 51 at 1-7, PWSA explained that it provides service to customers in added service territories but had inadvertently excluded listing them in its Initial Tariff effective March 1, 2019, that the customers and/or mains within the referenced service territories existed prior to the Commission’s assumption of jurisdiction over PWSA, and that the addition of these territories is intended as a tariff clean-up revision. Also, Supplement No. 16, Page 7 reflected the addition of the City of Pittsburgh’s Fox Chapel area and Ross, McKees Rocks, Sharpsburg, Penn Hills, Shaler, Swissvale and Wilkinsburg Townships (the Added Service Territories). Please provide responses for each of the following:
- a. Specify the number of customers, by customer class, served by PWSA in each of the Added Service Territories;

TUS Data Request Set 1

The Pittsburgh Water and Sewer Authority Supplement No. 16 Tariff Water – Pa. P.U.C. No. 1
at Docket No. R-2025-3055010

- b. Provide a map of suitable scale that depicts the location or route of PWSA’s water facilities in each of the Added Service Territories; and
 - c. If PWSA has any Added Service Territories where it owns or operates facilities within the Added Service Territory that do not serve any customers in that Added Service Territory, explain why PWSA is proposing to include the Added Service Territory in its tariff (e.g., a transmission main that runs through a municipality but does not serve any customers in that municipality).
- R-7. For PWSA’s last base rate case at Docket No. R-2023-3039920, in its response to TUS Data Request R-6, PWSA indicated that it served 7,551 public fire hydrants, of which 7,413 were for the City of Pittsburgh and the remaining 138 were for 11 other municipalities. However, PWSA’s response for Filing Requirement II.10. indicated that the City of Pittsburgh represents all of PWSA’s public fire protection customers, and that there are currently 7,553 hydrants. Also, PWSA’s response for Filing Requirement XI.6. did not identify all municipalities where PWSA provides service. Please clarify this apparent discrepancy and provide revised responses for Filing Requirements II.10 and XI.6. to identify all municipalities where PWSA provides service.