



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

IN REPLY PLEASE
REFER TO OUR FILE

June 13, 2025

Docket No. R-2025-3055010
Utility Code 2220554

DEANNE M ODELL ESQUIRE
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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 2

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

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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-8. PWSA’s responses for many filing requirements under 52 Pa. Code §§ 53.52 – 53.53 did not provide the same or similar data for stormwater service. For example, PWSA’s responses for 52 Pa. Code §§ 53.52(a)(2) and (3) did not specify the number of affected stormwater customers, and numerous responses for filing requirements under 52 Pa. Code § 53.53, Exhibit D, including Filing Requirements (FR) II.1-II.13, did not provide stormwater data. Also, in PWSA’s Second Revised Stage 2 Stormwater Compliance Plan filed with the Commission on October 24, 2022, at Docket No. M-2018-2640802, Page 3, PWSA indicated, “PWSA believes the same filing requirements for water and wastewater rates and/or service apply to stormwater.” Please provide responses for each of the following:

- a. Explain this apparent discrepancy and provide supplemental responses to filing requirements for 52 Pa. Code §§ 53.52 – 53.53 that either include missing stormwater data or that specify the locations of the data in PWSA’s filing; and
- b. Either confirm that in future rate filings, PWSA will provide stormwater data with its initial rate filing that is the same or of a similar type, quantum, and nature as required water and wastewater data (e.g., where FR II.1.a.ii. requires “gallons sold” for water and wastewater data, similar stormwater data may include equivalent residential units, where FR II.12. requires data for consumption and billings for the ten largest water and wastewater customers, similar stormwater data may include equivalent residential units and billings for the ten largest stormwater customers, etc.) or explain why PWSA believes that this data is not required.

R-9. PWSA’s responses for many filing requirements under 52 Pa. Code §§ 53.52 – 53.53 did not provide separate and distinct information by utility type (i.e., water, wastewater, and stormwater) as required by 52 Pa. Code § 53.52(d), which provides that if a utility renders more than one type of public service, information required by §§ 53.51-53.53 relates solely to the kind of service to which the tariff supplement applies. Also, PWSA’s response for 52 Pa. Code § 53.52(d) indicated, “Not applicable”, despite that PWSA provides more than one type of public service. Please provide responses for each of the following:

- a. Explain this apparent discrepancy and provide supplemental responses to filing requirements for 52 Pa. Code §§ 53.52 – 53.53 that either include separate and distinct data by utility type or that specify the locations of the data in PWSA’s filing;
- b. Reconfirm whether 52 Pa. Code § 53.52(d) applies to PWSA and provide a supporting explanation; and

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- c. Either confirm that in future rate filings, PWSA will provide separate and distinct data by utility type or explain why PWSA believes that this data is not required.
- R-10. PWSA’s responses for 52 Pa. Code § 53.52(b)(5) and (6) did not provide the number of customers, by customer class, whose bills will be decreased, and calculations of the total decreases, by customer class, projected to an annual basis. Instead, PWSA’s responses included proofs of revenue that provided annual billing units and revenues at present and proposed rates showing total increases. However, PWSA’s removal of minimum allowances may result in bill decreases for PWSA customers whose typical usage is less than their minimum allowance. Please provide the number of water and wastewater customers, by customer class, whose bills will be decreased, and provide calculations of the total decreases, by customer class, projected to an annual basis.
- R-11. PWSA’s response for filing requirement 52 Pa. Code § 53.52(c)(1) and FR I.5. did not provide required data. Instead, PWSA’s response indicated “Not applicable”. However, it appears that PWSA should now have sufficient book data by utility type to determine rates of return (i.e., net income before interest and surplus divided by depreciated original cost). Please provide revised responses for 52 Pa. Code § 53.52(c)(1) and FR I.5. that include PWSA’s calculations of water, wastewater, and stormwater rates of return on original cost earned in the historic test year, the future test year, and the fully projected future test year under present rates, *pro forma* present rates, and proposed rates.
- R-12. The Cooperation Agreement between the City of Pittsburgh (Pittsburgh) and PWSA dated October 3, 2019 (2019 Cooperation Agreement) was filed with the Commission on December 20, 2019, at Docket No. U-2020-3015258. Section 9 of the 2019 Cooperation Agreement included an agreement by PWSA to pay to Pittsburgh “an amount calculated pursuant to the Pennsylvania Public Utility Realty Tax” (PURTA Payments). Also, PWSA’s response for FR IV.15.d. indicated, “Not applicable” for public utility realty tax data. Please provide responses for each of the following:
- a. Provide the amounts of PWSA’s PURTA Payments for the test year per books, *pro forma* at present rates, and *pro forma* at proposed rates;
 - b. Confirm that PWSA is exempt from the Pennsylvania Public Utility Realty Tax as a municipal authority and that PURTA Payments are only required as part of the consideration exchanged under the 2019 Cooperation Agreement; and
 - c. If PWSA’s rates include PURTA Payments, explain why it is prudent, just, and reasonable for PWSA to continue to include PURTA Payments in rates.
- R-13. In Section 5.b.i. of PWSA’s Quarterly Compliance Plan Progress Report filed with the Commission on April 30, 2025, at Docket No. M-2018-2640802, PWSA indicated that its next service life study report will be due June 1, 2025 (2025 SLS). While it does not appear that PWSA filed its 2025 SLS with the Commission by June 1, 2025, 52 Pa. Code § 73.5(b)(1) provides for an August 31 due date for water utility studies. Please clarify

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when PWSA will file its 2025 SLS with the Commission, including whether the 2025
SLS will be filed with the Commission by August 31, 2025.