

June 26, 2025

Via Electronic Filing

Matthew Homsher, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Petition of Pittsburgh Water for Authorization to Increase Water and Wastewater DSIC
Charge Caps to 7.5%
Docket Nos. P-2025-3055650 (water) P-2025-3055652 (wastewater)

The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water –
Water – R-2025-3055010;

The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water –
Wastewater – R-2025-3055011;

The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water –
Stormwater – R-2025-3055012

Dear Secretary Homsher:

Enclosed for electronic filing please find Pittsburgh Water's Petition to Consolidate DSIC Increase Petition and Base Rate Cased Filings for Water, Wastewater and Stormwater in regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/lww

Enclosure

cc: Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Pittsburgh Water’s Petition to Consolidate DSIC Increase and Base Rate Filings upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

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Deanne M. O’Dell, Esq.

Dated: June 26, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pittsburgh Water for	:	Docket Nos. P-2025-3055650 (Water)
Authorization to Increase Water and	:	P-2025-3055652 (Wastewater)
Wastewater DSIC Charge Caps to 7.5%	:	
Pennsylvania Public Utility Commission	:	
	:	Docket Nos. R-2025-3055010 (Water)
v.	:	R-2025-3055011 (Wastewater)
	:	R-2025-3055012 (Stormwater)
The Pittsburgh Water and Sewer Authority	:	
d/b/a Pittsburgh Water	:	

**PETITION OF PITTSBURGH WATER TO CONSOLIDATE
DSIC INCREASE PETITION AND BASE RATE CASE FILINGS FOR
WATER, WASTEWATER, AND STORMWATER**

Pursuant to Section 5.41 and 5.81 of the regulations of the Pennsylvania Public Utility Commission (“Commission”), 52 Pa. Code §§ 5.41, 5.81(a), The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water (“Pittsburgh Water”) respectfully requests that the Commission formally consolidate Pittsburgh Water’s Petition for Authorization to Increase Water and Wastewater Distribution System Improvement Charge (“DSIC”) Caps to 7.5% with its water, wastewater, and stormwater rate case proceedings¹ because the request for approval to increase its DSIC is an integral component of the base rate increase request. All of the supporting factual basis and financial analysis related to Pittsburgh Water’s DISC Petition have been included with Pittsburgh Water’s rate case filing made on June 4, 2025 so that the impacts of Pittsburgh Water’s proposals can be comprehensively considered within the context of its overall rate case proposals. Thus, consolidating the dockets enables interested stakeholders and the Commission to address the

¹ On June 4, 2025, Pittsburgh Water also filed a Petition to Consolidate the water, wastewater, and stormwater rate cases and for authority to use combined water, wastewater, and stormwater revenue requirements.

integrally related issues in one comprehensive proceeding. In support thereof, Pittsburgh Water represents the following:

I. BACKGROUND

1. On June 4, 2025, Pittsburgh Water filed its base rate request at Docket Nos. R-2025-3055010 (water), R-2025-3055011 (wastewater), and R-2023-3055012 (stormwater) (“Rate Filing”). Pursuant to the Rate Filing, Pittsburgh Water is asking the Commission for approval of a multi-year overall rate increase of \$84.4 million, which is inclusive of the proposed 7.5% DSIC increase and expansion of the PENNVEST charge. The Rate Filing includes a \$63.7 million or 25.9% increase in the FPFTY (FY 2026), \$20.7 million or 6.7% in FY 2027, and \$53.9 million or 17.9% in FY 2026. Pittsburgh Water is also proposing to remove the minimum water and wastewater charge to be effective January 1, 2027, and to expand the PENNVEST charge starting in FY 2026. Taken together, these filings are intended to balance the revenue needs of Pittsburgh Water to appropriately invest in infrastructure, which has suffered from years of deferred maintenance, to maintain and improve its safety, reliability and customer service levels taking into appropriate consideration the impact of the requests on its ratepayers.

2. On June 4, 2025, Pittsburgh Water also filed a Petition to consolidate the water, wastewater, and stormwater proceedings and to utilize combined water, wastewater, and stormwater revenue requirements.

3. Also on June 4, 2025, Pittsburgh Water filed its Petition for Authorization to Increase Water and Wastewater Distribution System Improvement Charge Caps to 7.5% (“DSIC Petition”). Pursuant to the DSIC Petition, Pittsburgh Water asks that the Commission: (1) authorize a Water DSIC Cap of 7.5% of intrastate revenue permitted by Section 1358(b) of the public utility code; and (2) waive the provisions of Section 1358(a) of the Public Utility Code and authorize Pittsburgh Water to implement a 7.5% cap for its Wastewater DSIC.

4. On June 24, 2025, the Office of Consumer Advocate (“OCA”) and the Bureau of Investigation and Enforcement (“I&E”) each filed answers in response to the DSIC Petition. Both parties recommend that the Commission deny the Petition or, alternatively consolidate it into Pittsburgh Water’s Rate Filing at Docket Nos. R-2025-3055010, R-2025-3055011, and R-2025-3055012.

II. REQUEST FOR CONSOLIDATION OF PROCEEDINGS

5. For the reasons set forth herein, Pittsburgh Water requests that the above-captioned proceedings be formally consolidated into a single proceeding.

6. Section 5.81(a) of the Commission’s regulations states that “[t]he Commission or presiding officer, with or without motion, may order proceedings involving a common question of law or fact to be consolidated. The Commission or presiding officer [also] may make orders concerning the conduct of the proceeding as may avoid unnecessary costs or delay.” 52 Pa. Code § 5.81(a).²

7. Among the considerations for consolidation are: (a) whether additional issues exist that could cloud the determination of common issues; (b) whether consolidation will reduce litigation costs and decision-making for the parties and the Commission; (c) whether the issues in one proceeding go to the heart of an issue in the other proceeding; (d) whether consolidation will unduly protect a hearing or produce a disorderly or unwieldy record; (e) whether different statutory and legal issues are involved; (f) whether the party with the burden of proof differs in the

² See *Pa. PUC et al v. PWSA*, Docket Nos. R-2021-3024773 et al., Prehearing Order issued June 8, 2021 (consolidating Pittsburgh Waters’s 2021 rate case proceedings); *Pa. PUC v. PWSA*, Docket Nos. R-2023-3039919 et al., Orders issued July 10, 2023 (consolidating Pittsburgh Water’s 2023 rate case proceedings). See, e.g., additional cases that have been consolidated for adjudication, *Re Middletown Taxi Co.*, 50 Pa. PUC 263 (1976); for hearing, *City of York v. York Telephone and Telegraph Co.*, 43 Pa. PUC 240 (1967); for briefing, *Clepper Farms, Inc. v. Grantham Water Co.*, 41 Pa. PUC 749 (1965); or for all purposes, *Commonwealth of Pennsylvania et al. v. Respond Power LLC*, Docket No. C-2014-2427659 and *Pa. PUC v. Respond Power LLC*, Docket No. C-2014-2438640 (Interim Order dated October 28, 2014).

proceedings; (g) whether consolidation will unduly delay the resolution of one of the proceedings; and (h) whether supporting data in both proceedings will be repetitive.³ As the Commission has previously determined, no single consideration, nor group of these considerations, is dispositive of consolidation. Rather, all factors must be evaluated, and a balancing of those favoring and disfavoring consolidation is required.⁴

8. Pittsburgh Water's DSIC Petition and Rate Filings are interrelated and raise common issues of law and fact. The Rate Filings comprehensively address Pittsburgh Water's overall financing plan which includes revenue received from base rates as well as from an increased DSIC and takes into consideration shifts in revenues anticipated to be collected with the removal of the minimum allowance. The Rate Filings set forth Pittsburgh Water's views about how each of these proposals can be best leveraged to provide overall long-term benefits for ratepayers by utilizing the various funding sources to their full potential. Pittsburgh Water's Rate Filings present a substantial amount of financial data in support of its proposals (including base rates and increased DSIC cap) and detailed explanations about how these proposals are designed to work together to balance Pittsburgh Water's revenue needs with the financial impacts on ratepayers. Streamlining the review of these issues in one proceeding is in the public interest because consolidation of the proceedings will ensure a more comprehensive record is developed and will allow interested parties to concentrate resources on one litigation rather than several.

9. As explained above, Pittsburgh Water's DSIC Petition is interrelated with its Rate Filing. Direct Testimony included with Pittsburgh Water's Rate Filing addresses the justification and development of the requested DSIC as well as how approval of the increased DSIC will

³ See *Pa. Pub. Util. Comm'n v. City of Lancaster Sewer Fund*, Docket No. R-2012-2310366, at p. 3-4 (Second Prehearing Order Nov. 26, 2012) ("*Lancaster Sewer Fund Prehearing Order*").

⁴ *Id.* at 3.

support Pittsburgh Water's overall financing plan. Given the interrelatedness of these issues within Pittsburgh Water's overall proposed rate plan, consolidating the DSIC Petition with the Rate Filing will offer the opportunity for a broader overview of how the proposed increase in DSIC fits within Pittsburgh Water's overall plans to address years of deferred maintenance on infrastructure within the overall framework of presenting a just and reasonable rate increase proposal for the benefit of all Pittsburgh Water ratepayers.

10. If consolidation were not to occur, then the DSIC Petition would likely be assigned to the Office of Administrative Law Judge for an on-the-record proceeding. Such an assignment would require the parties to essentially duplicate the efforts of the Rate Filings and then present the Commission with separate dockets to decide the interrelated issues.

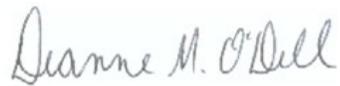
11. Thus, consolidation will reduce litigation costs and decision-making for the parties and the Commission; the issues in one proceeding go to the heart of the issues in the other proceedings; consolidation will produce an orderly record that can be used to adjudicate all proceedings; and consolidation will not unduly delay the resolution of the proceedings.

12. In summary, consolidating these proceedings for hearing and decision would promote judicial economy and conserve valuable resources of the parties and the Commission. Since the proceedings involve the same issues of fact and law, no reason exists to have them litigated on separate paths.

III. CONCLUSION

WHEREFORE, on the basis of the foregoing, Pittsburgh Water respectfully requests that the Commission consolidate Docket Nos. P-2025-3056550 (water DSIC), P-2025-3056552 (wastewater DSIC), and the previously requested to be consolidated rate filings at Docket Nos. R-2025-3055010 (water), R-2025-3055011 (wastewater), and R-2025-3055012 (stormwater).

Respectfully submitted,



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Dated: June 26, 2025

Attorneys for The Pittsburgh Water and Sewer Authority

VERIFICATION

I, William J. Pickering, am the Chief Executive Officer for Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water, and I hereby state that the facts set forth in the foregoing Petition to Consolidate DSIC Increase Petition and Base Rate Case Filings for Water, Wastewater and Stormwater are true and correct to the best of my knowledge, information and belief and that I expect Pittsburgh Water 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).

/s/ William J. Pickering

William J. Pickering
Chief Executive Officer
The Pittsburgh Water and Sewer Authority