

RCVD PUC SEC BUR
JUN 24 2025 PM 3:59

COMMONWEALTH OF PENNSYLVANIA



DARRYL A. LAWRENCE
Consumer Advocate

OFFICE OF CONSUMER ADVOCATE
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
(800) 684-6560

@pa_oca
/pennoca
FAX (717) 783-7152
consumer@paoca.org
www.ocb.pa.gov

June 24, 2025

Via Hand Delivery

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

Re: The Pittsburgh Water and Sewer
Authority d/b/a Pittsburgh Water- Water
Docket Nos. ~~R-2025-3055010~~
P-2025-3055587

The Pittsburgh Water and Sewer
Authority d/b/a Pittsburgh Water-
Wastewater
Docket Nos. R-2025-3055011
P-2025-3055588

The Pittsburgh Water and Sewer
Authority d/b/a Pittsburgh Water-
Stormwater
Docket Nos. R-2025-3055012
P-2025-3055588

Dear Secretary Homsher,

On June 4, 2025, in conjunction with its water, wastewater and stormwater rate filings seeking an overall multi-year rate revenue request of \$84.4 million (inclusive of a requested increase to the Distribution System Improvement Charge (DSIC) cap to 7.5% and expansion of the PENNVEST charge, Pittsburgh Water and Sewer Authority (Pittsburgh Water or Authority) filed a Petition for Consolidation of Water, Wastewater and Stormwater Rate Proceedings and for Authorization to Use Combined Water, Wastewater and Stormwater Revenue Requirements (Consolidation Petition) in the above-referenced dockets. In its Petition, Pittsburgh Water requests

the Commission's permission to do the following: (1) consolidate its water base rate proceeding, docketed at R-2025-3055010, its wastewater rate proceeding, docketed at R-2025-3055011, and its stormwater rate proceeding, docketed at R-2025-3055012 into a single proceeding; and (2) allow PWSA to use a consolidated water/wastewater/stormwater revenue requirement in the single proceeding for the requested base rate increases. Petition at ¶¶ 6,11.

Please allow this letter to serve as notice that the OCA does not oppose Pittsburgh Water's Consolidation Petition. Despite OCA's non-opposition, an important caveat exists. Specifically, the OCA's support should not be construed to operate as assent to Pittsburgh Water's request for rate relief (including the proposed increase to the DSIC cap and the expansion of the PENNVEST charge), the reasonableness or prudence of any costs it seeks, or any claims it is making. On the contrary, and consistent with Paragraph 15 of PWSA's Petition, issues of reasonableness, prudence, and appropriateness of any rate relief and allocation pursuant to Section 1311(c), are issues that are, and must remain, preserved for resolution before the Commission.

Sincerely,

/s/ Christy M. Appleby

Christy M. Appleby

Senior Assistant Consumer Advocate

PA Attorney I.D. # 85824

E-Mail: CAppleby@paoca.org

cc: Office of Administrative Law Judge
Office of Special Assistants
Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission,	:	
	:	
v.	:	Docket Nos. P-2025-3056550
	:	P-2025-3056552
	:	
Pittsburgh Water's Petition for Authorization	:	
To Increase DSIC Water and Wastewater	:	

I hereby certify that I have this day filed electronically on the Commission's electronic filing system and served a true copy of the following document, the Office of Consumer Advocate's letter regarding the Petition of Pittsburgh Water and Sewer Authority for Consolidation of Water, Wastewater, and Stormwater Rate Proceedings and for Authorization to Use Combined Water, Wastewater, and Stormwater Revenue Requirements, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below.

Dated this 24th day of June 2025.

SERVICE BY E-MAIL ONLY

Deanne M. O'Dell, Esq.
 Daniel Clearfield, Esq.
 Lauren Burge, Esq.
 Eckert Seamans Cherin & Mellott, LLC
 213 Market Street, 8th Floor
 Harrisburg, PA 17101
 dodell@eckertseamans.com
 dclearfield@eckertseamans.com
 lburge@eckertseamans.com
Counsel for PWSA

Scott B. Granger, Esq.
 Michael A. Podskoch, Jr., Esq.
 Pennsylvania Public Utility Commission
 Bureau of Investigation & Enforcement
 Commonwealth Keystone Building
 400 North Street, 2nd Floor West
 Harrisburg, PA 17120
 sgranger@pa.gov
 mpodskoch@pa.gov
Counsel for I&E

John F. Doherty, Esq.
Krycia Kubiak, City Solicitor
The City of Pittsburgh Dept. of Law
City-County Building, Suite 313
414 Grant Street
Pittsburgh, PA 15219
John.doherty@pittsburghpa.gov
krycia.kubiak@pittsburghpa.gov
Counsel for The City of Pittsburgh

John W. Sweet, Esq.
Elizabeth R. Marx, Esq.
Ria M. Pereira, Esq.
The Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
pulp@pautilitylawproject.org
Counsel for PULP

Steven C. Gray, Esq.
Rebecca Lyttle, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov
relyttle@pa.gov
Counsel for OSBA

/s/ Christy M. Appleby
Christy M. Appleby
Senior Assistant Consumer Advocate
PA Attorney I.D. # 85824
E-Mail: CAppleby@paoca.org

Harrison W. Breitman
Assistant Consumer Advocate
PA Attorney I.D. #320580
E-Mail: HBreitman@paoca.org

David T. Evrard
Assistant Consumer Advocate
PA Attorney I.D. # 33870
E-Mail: DEvrard@paoca.org

Katie Kennedy
Assistant Consumer Advocate
PA Attorney I.D. # 317237
E-Mail: KKennedy@paoca.org
E-Mail: OCAPWSA2025@paoca.org

Counsel for:
Darryl A. Lawrence
Consumer Advocate

Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: 717-783-5048
Fax: 717-783-7152

Dated: June 24, 2025