

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

July 9, 2025

Via Electronic 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

Re: Pennsylvania Public Utility Commission v.
Pittsburgh Water and Sewer Authority
d/b/a Pittsburgh Water
Docket No. R-2025-3055010 (Water)
R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)

Dear Counsel:

Enclosed please find Interrogatories of the Office of Consumer Advocate, Sets 3-4, in this matter.

In accordance with the Commission's Rules of Practice and Procedure, at 52 Pa. Code Section 5.342(d), we request that the Company provide verified answers to these inquiries within fifteen (15) calendar days of the date of this letter. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed.

We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

Deanne M. O'Dell, Esq.
Daniel Clearfield, Esq.
Lauren Burge, Esq.
July 9, 2025
Page 2

OCAPWSA2025@paoca.org

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Homsher of the Pennsylvania Public Utility Commission as required by 52 Pa. Code § 5.341(b).

Respectfully submitted,

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

Enclosures

cc: PUC Secretary Matthew L. Homsher (Letter and Certificate of Service only)
Certificate of Service

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission	:	
	:	Docket No. R-2024-3055010
v.	:	R-2025-3055011
	:	R-2025-3055012
Pittsburgh Water and Sewer Authority	:	
d/b/a Pittsburgh Water	:	

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 documents, the Office of Consumer Advocate's Interrogatories to Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water, Sets 3-4, 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 9th day of July 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 Pittsburgh Water

John F. Doherty, Esq.
Krysia 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
krysia.kubiak@pittsburghpa.gov
Counsel for The City of Pittsburgh

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

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

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

/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

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

Dated: July 9, 2025

Counsel for:
Darryl A. Lawrence
Consumer Advocate