



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

BUREAU OF  
INVESTIGATION  
&  
ENFORCEMENT

August 6, 2025

**Via Electronic Mail**

Deanne O'Dell, Esq.  
Daniel Clearfield, Esq.  
Lauren Burge, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)

Re: Pennsylvania Public Utility Commission v.  
The Pittsburgh Water and Sewer Authority  
Docket Nos. R-2025-3055010 (Water); R-2025-3055011 (Wastewater);  
R-2025-3055012 (Stormwater)

**I&E Interrogatories**

Dear Counsel:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Interrogatories Set RB (nos. 1-3) – Sakaya** in the above-captioned proceeding. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding person(s).

The responses to these Interrogatories are due within ten (10) calendar days of service. Please provide your responses via email to the email addresses listed below.

Copies are being served on parties per the attached Certificate of Service. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in grey ink that reads "Michael Podskoch".

Michael A. Podskoch, Jr., Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 330132  
(717) 783-6151  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)

Scott B. Granger, Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 63641  
(717) 425-7593  
[sgranger@pa.gov](mailto:sgranger@pa.gov)

Enclosures

cc: Matthew L. Homsher, Secretary (*Cover Letter and Certificate of Service only – via e-file*)  
Per Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

|                                          |   |                                    |
|------------------------------------------|---|------------------------------------|
| Pennsylvania Public Utility Commission   | : |                                    |
|                                          | : |                                    |
| v.                                       | : | Docket Nos. R-2025-3055010 (Water) |
|                                          | : | R-2025-3055011 (Wastewater)        |
| The Pittsburgh Water and Sewer Authority | : | R-2025-3055012 (Stormwater)        |

**CERTIFICATE OF SERVICE**

I hereby certify that I am serving the foregoing **Interrogatories** dated August 6, 2025, in the manner and upon the persons listed below:

**Served via Electronic Mail Only**

Deanne O'Dell, Esq.  
Daniel Clearfield, Esq.  
Lauren Burge, Esq.  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101  
[dodell@eckertseamans.com](mailto:dodell@eckertseamans.com)  
[dclearfield@eckertseamans.com](mailto:dclearfield@eckertseamans.com)  
[lburge@eckertseamans.com](mailto:lburge@eckertseamans.com)

Christy M. Appleby, Esq.  
Harrison W. Breitman, Esq.  
David T. Evrard, Esq.  
Katie Kennedy, Esq.  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[OCAPWSA2025@paoca.org](mailto:OCAPWSA2025@paoca.org)

Jesse I. Exilus, Deputy City Solicitor  
Krysia Kubiak, City Solicitor  
Pittsburgh Department of Law  
City-County Building, Suite 313  
414 Grant Street  
Pittsburgh, PA 15219  
[jesse.exilus@pittsburghpa.gov](mailto:jesse.exilus@pittsburghpa.gov)  
[krysia.kubiak@pittsburghpa.gov](mailto:krysia.kubiak@pittsburghpa.gov)

Steven C. Gray, Esq.  
Rebecca Lyttle, Esq.  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[sgray@pa.gov](mailto:sgray@pa.gov)  
[relyttle@pa.gov](mailto:relyttle@pa.gov)

John W. Sweet, Esq.  
Lauren N. Berman, Esq.  
Ria M. Pereira, Esq.  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101  
[pulp@pautilitylawproject.org](mailto:pulp@pautilitylawproject.org)



---

Michael A. Podskoch, Jr.  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 330132  
(717) 783-6151  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)

Scott B. Granger  
Prosecutor  
Bureau of Investigation and Enforcement  
PA Attorney ID No. 63641  
(717) 425-7593  
[sgranger@pa.gov](mailto:sgranger@pa.gov)