

October 16, 2025

Via Electronic Filing

Matthew L. Homsher, Secretary
Pa. Public Utility Commission
400 North Street
Harrisburg, PA 17120

RE: Tirlochan S. Walia v. The Pittsburgh Water and Sewer Authority;
Docket No. F-2022-3032572

Dear Secretary Homsher:

On behalf of The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water (“Pittsburgh Water”), please accept this letter in lieu of a Reply Brief in the above-referenced matter. This reply addresses the Closing Statement dated September 22, 2025 that was submitted by Tirlochan Walia (“Complainant” or “Mr. Walia”) and is being submitted in accordance with the Interim Order issued by Administrative Law Judge Emily I. DeVoe on September 25, 2025.

In its Main Brief, Pittsburgh Water provided a detailed explanation of its method of calculating customer bills and billing in 1,000-gallon increments, how this method is consistent with its Commission-approved tariff and industry standard practices, and why the technological limitations of meters in Pittsburgh Water’s service territory necessitate billing in this way. Additionally, Pittsburgh Water provided a step-by-step description of how Mr. Walia’s November 18, 2021 and February 17, 2022 bills were calculated consistent with the tariff.

In the interest of brevity and to avoid unnecessary repetition concerning its position on the issues in this proceeding, Pittsburgh Water hereby incorporates herein by reference its Main Brief filed on October 2, 2025, which addresses many of the claims that Mr. Walia made in his Closing Statement.

Pittsburgh Water wishes to respond to Mr. Walia’s Closing Statement on two points. First, Mr. Walia cites the Commission’s prior Orders issued on April 20, 2023 and June 15, 2023, but he takes these Orders out of context. These were not final orders; rather, the Orders remanded this matter back to the Office of Administrative Law Judge for clarification and/or the receipt of additional evidence. Pittsburgh Water’s Main Brief properly explains why Mr. Walia’s bills were correct as issued and consistent with Pittsburgh Water’s tariff, as fully supported by the record in

this proceeding and testimony from two additional hearings on remand. In addition, Pittsburgh Water strongly denies Mr. Walia's unsupported allegations of "perjury" or "flagrant disregard" of the Public Utility Code, which are clearly not supported by the record in this proceeding.

As the Complainant, Mr. Walia has the burden of proving that Pittsburgh Water violated its tariff or any law, regulation or order within the Commission's jurisdiction. Mr. Walia has failed to prove any such violation and therefore has not met his burden of proof. For these reasons and those discussed herein and in Pittsburgh Water's Main Brief, Pittsburgh Water respectfully requests that Mr. Walia's Complaint be dismissed in its entirety.

Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

/s/ Lauren M. Burge

Lauren M. Burge

Enclosures

cc: Certificate of Service w/enc

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the enclosed **Letter in Lieu of Reply Brief** upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via First Class Mail

Tirlochan S. Walia
100 Denniston Street, Apt. 232
Pittsburgh, PA 15206

Via Email

Hon. Emily I. DeVoe
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
301 5th Avenue, Suite 220
Pittsburgh, PA 15222
edevoe@pa.gov

Date: October 16, 2025

/s/ Lauren M. Burge

Lauren M. Burge, Esquire

*Counsel for
The Pittsburgh Water and Sewer Authority
d/b/a Pittsburgh Water*