



November 17, 2025

Via Electronic Filing

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17120-3265

**Re: Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority,
d/b/a Pittsburgh Water**

**Docket Nos. R-2025-3055010 (Water); R-2025-3055011 (Wastewater);
R-2025-3055012 (Stormwater)**

*Pittsburgh United Our Water Table Pre-Served Testimony; Exhibits and Appendices; and
Verification Statement*

Dear Secretary Homsher,

In accordance with 52 Pa. Code § 5.412a, please accept for filing the following **Pre-Served Testimony; Exhibits and Appendices; and Verification Statement on behalf of Pittsburgh United Our Water Table** in the above-captioned proceeding. The following documents were admitted into the record via Administrative Law Judge Emily I. DeVoe's Interim Order Adopting Joint Stipulation for Admission of Evidence and Granting Motion to Admit into the Record that was issued on November 12, 2025 in this matter:

- Direct Testimony of Patrick M. Cicero on behalf of Pittsburgh United Our Water Table (OWT Statement 1)
 - 100 pages of written testimony
 - OWT St. 1, Cicero, Exhibit 1, Burden Tables
 - OWT St. 1, Cicero, Appendix A, Resume – Patrick M. Cicero
 - OWT St. 1, Cicero, Appendix B, Selected Interrogatory Responses cited and relied on throughout testimony

- Rebuttal Testimony of Patrick M. Cicero on behalf of Pittsburgh United Our Water Table (OWT Statement 1-R)
 - 8 pages of written testimony
- Surrebuttal Testimony of Patrick M. Cicero on behalf of Pittsburgh United Our Water Table (OWT Statement 1-SR)
 - 35 pages of written testimony
 - Pittsburgh United OWT Statement 1, Cicero, Exhibit 1, corrected – Burden Tables
- Verification of Patrick M. Cicero for Pittsburgh United Our Water Table

As indicated on the attached Certificate of Service, service on the parties was accomplished by email only.

Respectfully Submitted,



Ria M. Pereira, Esq.

Counsel for Pittsburgh United Our Water Table

CC: *Hon. Emily I. DeVoe (Cover Letter and Certificate of Service only - via email)*
Hon. Ann Quimby (Cover Letter and Certificate of Service only - via email)
Per Certificate of Service (Cover Letter and Certificate of Service only)

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission : Docket Nos. R-2025-3055010
: R-2025-3055011
v. : R-2025-3055012
:
Pittsburgh Water and Sewer Authority d/b/a :
Pittsburgh Water :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served copies of the foregoing **Letter** upon the parties of record in the above-captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54 in the manner and upon the persons listed below.

VIA EMAIL

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Respectfully Submitted,
PENNSYLVANIA UTILITY LAW PROJECT
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Date: November 17, 2025

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**DIRECT TESTIMONY OF PATRICK M. CICERO
ON BEHALF OF
PITTSBURGH UNITED OUR WATER TABLE**

September 5, 2025

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Pittsburgh United OWT St. 1, Exhibit 1

Appendix A: Resume of Patrick Cicero

Appendix B: Selected Interrogatory Responses cited and relied on throughout testimony

1 **PREPARED DIRECT TESTIMONY OF PATRICK M. CICERO**

2 **I. Introduction and Background**

3 **Q: Please state your name, occupation, and business address?**

4 A: My name is Patrick M. Cicero. I am employed by the Pennsylvania Utility Law Project, a
5 specialized component of Regional Housing Legal Services. My job title is Of Counsel, and my
6 role encompasses a broad range of responsibilities. For example, in cases such as this one where I
7 am not representing any client as an attorney, I provide analysis and testimony on utility matters
8 for eligible organizations and low income clients who are represented by members of the statewide
9 legal aid network. My business address is 118 Locust Street, Harrisburg, PA 17101.

10 **Q: For whom are you testifying in this proceeding?**

11 A: I am testifying on behalf of Pittsburgh United’s Our Water Table (OWT).

12 **Q: What is the purpose of your testimony?**

13 A: OWT intervened in this case to ensure that Pittsburgh Water and Sewer Authority’s
14 (hereinafter Pittsburgh Water or the Authority) proposed rate increase and proposed rate design
15 will not adversely affect low and moderate income customers’ ability to connect to, maintain, and
16 afford water, wastewater, and stormwater service, which are essential and critical components to
17 a safe and healthy home and a livable community.¹

18 My testimony assesses Pittsburgh Water’s existing and proposed rates, tariff, rules,
19 procedures, and programs to determine whether they are just, reasonable, and appropriately
20 designed to ensure that low income Pennsylvanians within the Authority’s service territory can
21 equitably access and maintain safe and affordable utility services. In addition, I analyze Pittsburgh
22 Water’s low income assistance programs and other assistance programs as well as its customer

¹ See OWT Pet. to Intervene and Answer at ¶¶ 7-11.

1 service offerings, including the way customers can pay their bills. Further, I outline why approving
2 any rate increase must be conditioned on significant improvements to its assistance program
3 service offerings and other tariff changes designed to ensure that the Authority’s low income
4 customers can afford to connect to and maintain service. I also recommend that the Public Utility
5 Commission (PUC or Commission) reject Pittsburgh Water’s multi-year rate plan as it would
6 unreasonably shift risk to customers based on uncertain projections and without sufficient
7 Commission oversight.

8 **Q: Have you provided testimony before the Pennsylvania Public Utility Commission in**
9 **any prior cases?**

10 A: Yes. I am currently a witness in several ongoing distribution rate case proceedings:

- Pennsylvania Public Utility Commission v UGI Utilities, Inc. – Gas Division, Docket No. R-2024-3052716. Distribution base rate proceeding.
- Pennsylvania Public Utility Commission v Philadelphia Gas Works, Docket No. R-2025-3053112. Distribution base rate proceeding.
- Pennsylvania Public Utility Commission v Columbia Gas of Pennsylvania, Docket No. R-2025-3053499 Distribution base rate proceeding.

11 Apart from those proceedings, my prior experience before the PUC has been as an attorney
12 representing clients and in my role as the statutory representative of consumers while serving as
13 Pennsylvania’s Consumer Advocate leading the Office of Consumer Advocate.

14 **Q: What are your qualifications to provide the testimony you are providing in this case?**

15 A: I have nearly 23 years of experience as an attorney, 20 years of which have been in the
16 practice of legal aid or consumer advocacy. I have attached my resume, which outlines my relevant
17 credentials and work experience as Appendix A. After 2 years clerking for a federal district court
18 judge, I spent approximately 5 years as a staff attorney at MidPenn Legal Services in Harrisburg
19 where I represented clients facing eviction, foreclosure, bankruptcy, and utility termination. After

1 returning briefly to clerk at the federal district court, in early 2011, I began working at the
2 Pennsylvania Utility Law Project (PULP) – first as a staff attorney and ultimately as its Executive
3 Director. In 2020, I was hired to lead the statewide legal aid network when I became the Executive
4 Director of the Pennsylvania Legal Aid Network. There, I coordinated the work of Pennsylvania’s
5 legal aid system that provides civil legal aid to low income Pennsylvanians on a range of civil legal
6 issues. On December 13, 2021, I was appointed as the Commonwealth’s Consumer Advocate
7 leading the Office of Consumer Advocate (OCA). I was confirmed by the Pennsylvania Senate in
8 June 2022. I served as the Consumer Advocate until January 31, 2025. On February 28, 2025, I
9 returned to PULP in my current role.

10 Throughout my tenure in each of these roles, I have had the opportunity to see firsthand
11 the extraordinary efforts that low income consumers take to remain stably housed and connected
12 to essential utility service. Day in and day out, low income consumers – almost all of whom
13 struggle to survive at income levels that are at or below 150% of the federal poverty guidelines² –
14 are forced to make difficult decisions about which bills to pay and which they must forgo. I have
15 relevant experience helping low income consumers understand their utility bills and rates, why
16 their charges are what they are, and what assistance, if any, is available to them to help pay their
17 bills.

18 Furthermore, for almost 15 years at PULP and the OCA, I was instrumentally involved in
19 the litigation of hundreds of cases before the PUC including rate cases, default service cases,
20 universal service and energy conservation proceedings, Act 129 cases, and numerous other

² To put this in context, the 2025 federal poverty income guidelines, known as the Federal Poverty Level (FPL) for a family of 4 require that a household not have more than \$32,150 in annual income to be considered poor, which translates to \$48,225 at 150% of the federal poverty guidelines. The complete guidelines are available here: Office of the Assistant Secretary for Planning and Evaluation (ASPE), “Poverty Guidelines”, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines> (last visited Aug. 20, 2025).

1 proceedings that require working knowledge and expertise in the issues about which I am testifying
2 in this proceeding. Throughout my career, I developed specialized expertise in the needs of low
3 income customers, the regulation of public utilities, the nuanced design and policy considerations
4 of utility rates, and the ways that our regulatory system often fails the very consumers it is designed
5 to protect. The imbalance of power between utilities and consumers has resulted in utilities
6 increasing rates at a significant pace. It has also resulted in utilities implementing more complex
7 rates and rate designs. Taken together, this means that consumers, particularly low income
8 consumers, are now more than ever struggling to understand the complexity of their utility bills,
9 including how they are calculated each month, and what they can do to rein in the ever-increasing
10 costs to allow them to afford and remain connected to essential utility service.

11 **Q: Have you prepared Exhibits or Appendices to accompany your testimony?**

12 A: Yes. I have attached Exhibit PC-1 to my testimony. In addition, I have attached my resume
13 as Appendix A and the interrogatory responses that I relied on throughout my testimony are
14 attached as Appendix B.

15 **Q: Do you have any preliminary matters to address?**

16 A: Yes. I am an attorney who has also represented clients before the PUC. My role in this case
17 is as a witness; I am not serving as counsel for OWT or any other client in this proceeding. I have
18 provided no legal opinion or services for OWT or any other client in this case. Throughout my
19 testimony, I refer to decisions by regulatory agencies and courts as well as reference statutes and
20 regulations. These statements should not be considered legal opinions and should not be confused
21 with the legal opinions or advocacy of the attorneys representing OWT in this case. Any reference
22 or citation is merely to provide context and support for my opinions about the public policy,
23 ratemaking or rate design issues that I address in my testimony.

1 **II. Purpose of this Rate Case**

2 **Q: Please describe the purpose of this case?**

3 A: In this case, as in all rate cases, the Commission must determine the just and reasonable
4 rates for Pittsburgh Water under Chapter 13³ and other provisions of the Public Utility Code,
5 including Chapter 32.⁴ According to Pittsburgh Water, its current rates are inadequate as they
6 would produce – without rate relief – a insufficient cash deficit at the end of the Fully Projected
7 Future Test Year (FPFTY).⁵ Pittsburgh Water asserts that its days of cash on hand at current rates
8 is not sufficient and, that, as a municipally owned utility regulated on a cash-flow basis, it is
9 completely dependent on revenues from its ratepayers to continue to provide service.⁶

10 Pittsburgh Water seeks a multi-year overall rate increase of \$84.4 million, which is
11 inclusive of its requested increase to the Distribution System Improvement Charge (DSIC) cap to
12 7.5%⁷ and its requested expansion of the PENNVEST Charge on March 3, 2026. The overall rate
13 increase includes a \$63.7 million or 25.9% increase in the Fully Projected Future Test Year (FY
14 2026) and \$20.7 million or 6.7% in FY 2027. In addition to determining whether the Authority’s
15 requested revenue requirement is just and reasonable, the Commission must also determine
16 whether the rates and rate design chosen to collect that revenue is just and reasonable. In making
17 this determination, the Commission must consider the impact of rates on consumers, including
18 Pittsburgh Water’s low income customers.⁸

³ 66 Pa. C.S. § 1301 *et seq.*

⁴ 66 Pa. C.S. § 3201 *et seq.*

⁵ Pittsburgh Water St. 2 at 5.

⁶ *Id.*

⁷ Separately, Pittsburgh Water filed a petition to increase its DSIC from 5% to 7.5% at the effective date of rates in this proceeding.

⁸ *Federal Power Comm’n v. Hope Nat’l Gas Co.*, 320 U.S. 591, 603 (1944) (“[T]he fixing of ‘just and reasonable rates’, involves a balance of the investor and consumer interests.”)

1 **Q: Please explain why the Commission must consider the impact to consumers in making**
2 **its determination about the appropriate rate increase.**

3 A: Fundamentally, the Commission’s job is to restrain the monopolistic tendencies of public
4 utilities.⁹ If left unchecked by regulatory oversight, a utility could charge whatever it wanted
5 because consumers have no other choice but to buy the utility’s product if they want service. This
6 is an intentional system design because multiple companies running pipes in the ground to deliver
7 service to customers within a geographic area would not function well. Thus, in exchange for the
8 right to serve customers without competition for its services, and the requirement and duty to
9 provide service to all customers, combined water, wastewater and stormwater utilities like
10 Pittsburgh Water submit to price regulation by the Commission, including oversight as to rates and
11 service quality. The Commission must permit Pittsburgh Water the opportunity to recover its
12 prudently and reasonably incurred costs, including its cost of debt, and maintain a suitable financial
13 profile to access capital at reasonable rates. This is what we call the regulatory compact.

14 **Q: Is the regulatory compact a legal concept?**

15 A: No, it is a public policy concept, but the Commission has statutory authority and discretion
16 to enforce the regulatory compact through the Public Utility Code. Traditionally, this is done
17 through cost-of-service ratemaking that allows a utility the opportunity to earn its allowed rate of

⁹ This principle, that it is the job of the PUC to restrain the monopolistic tendencies of public utilities is not new or novel, but rather foundational to the role of regulators. The PUC recently reaffirmed this principle in its Fully Projected Future Test Year Final Rulemaking Order when it said: “Inherent in the ‘cost of providing service’ principle of ratemaking is the recognition that public utilities are natural monopolies and that the PUC’s oversight through cost-of-service ratemaking regulation serves as a proxy for a competitive market in appropriately restraining, or exerting downward pressure on, the profit-maximizing prices a monopoly could otherwise charge in the absence of price regulation.” Use of Fully Projected Future Test Year 52 Pa. Code Chapter 53, PUC Docket No. L-2012-2317273, Final Form Order at 4 (order entered January 8, 2025), available at: <https://www.puc.pa.gov/pcdocs/1874340.pdf> (hereinafter “FPFTY Final Form Order”). (last visited August 22, 2025)

1 return through effective and efficient management. When done correctly, this benefits both
2 customers and the utility.

3 **Q: Please explain.**

4 A: As noted above, there is no competition for public utility service. Thus, traditional
5 ratemaking and regulation serves as a substitute for the beneficial aspects of competition because
6 it sets rates only on a forward-going basis.¹⁰ In a competitive market, a business is not guaranteed
7 a profit, instead it must operate efficiently and control its costs. With traditional ratemaking, this
8 is the same pattern for a utility. Rates are set at a point in time, based on the known and measurable
9 costs and need for revenue by the utility, and then only on a forward-going basis. Once set, the
10 rates are fixed until changed by the Commission in subsequent rate cases. This practice encourages
11 the utility to operate efficiently because it cannot increase rates again without Commission
12 permission. As a result, a utility faces the risk of under recovery due to normal business risks and
13 management underperformance. Utilities also face the risk of under recovery due to their
14 calculations about sales projections. This lack of any guaranteed revenue is the most important
15 protection that traditional cost of service ratemaking provides to consumers.

16 **Q: Given that Pittsburgh Water does not have a return on equity component to its rates,
17 are these concepts still applicable?**

18 A: Yes. While Pittsburgh Water does not have shareholders it is subject to the same temptation
19 to seek more revenue than necessary. Rigorous regulatory oversight that reins in high rates and
20 unreasonable rate design is still necessary to provide discipline on Pittsburgh Water to more
21 effectively manage its costs and accurately project its sales and revenues. Without these
22 constraints, Pittsburgh Water has little to no incentive to make accurate projections in its rate cases

¹⁰ See FPFTY Final Form Order at 4.

1 or to engage in effective and prudent management. Moreover, while Pittsburgh Water has no
2 shareholders, its customers remain captive in that they have no other alternative if they want water
3 or wastewater service.

4 **Q: Do we have traditional cost of service ratemaking in Pennsylvania?**

5 A: Pennsylvania has a modified version of traditional cost of service ratemaking in several
6 ways, three of which are:

- 7 • Use of Future Test Year or Fully Projected Future Test Year for setting rates to reduce
8 regulatory lag between plant investment and recovery;¹¹
- 9 • Alternative ratemaking such as through a multi-year rate plan and pass through
10 surcharges;¹²
- 11 • Approval of a DSIC to collect additional revenue over and above the authorized revenue
12 requirement between rate cases.¹³

13 Each of the above modifies the traditional paradigm and shifts the risk of under recovery
14 of the authorized revenue requirement from the utility to its customers in ways that are often subtle
15 but cumulatively add significantly more certainty for a utility's bottom line.

16 **Q: Please explain.**

17 A: First, there is the use of the fully projected future test year or FPFTY. As applied to this
18 case, Pittsburgh Water is projecting forward to what it believes its expenses, capital additions, and
19 other costs will be as of January 1, 2027, but is asking that rates be set as of the end of the
20 suspension period, which is March 3, 2026, on a prospective basis. Like all people and businesses,
21 Pittsburgh Water does not know the future, so it is making projections about what the world will

¹¹ 66 Pa. C.S. § 315(e).

¹² 66 Pa. C.S. § 1330.

¹³ 66 Pa. C.S. § 1353.

1 be like as of January 2027, but it is permitted to charge rates *as if* those projections will in fact be
2 true in March 2026. That is, effective with the end of the suspension, if any rate increase is granted,
3 Pittsburgh Water would be collecting more revenue than it needs at that time because its rates are
4 set to coincide with the world as Pittsburgh Water projects it to be in January 2027. The effect is
5 to reduce the risk of under collection for Pittsburgh Water and shift it to consumers because
6 consumers are, in effect, paying for the cost of providing water, wastewater, and stormwater
7 service as Pittsburgh Water projects those costs to be in the future – based on the series of allowed
8 assumptions in this case – not as it exists when the rates go into effect.

9 Second, the use of alternative ratemaking further seeks to reduce risk for Pittsburgh Water.
10 Specifically, Pittsburgh Water has proposed a multiyear rate plan in which it seeks to implement
11 an increase in rates of more than \$20 million in 2027 without the scrutiny of a full rate case. While
12 Pittsburgh Water has limited its request to recover only debt financing and increased DSIC in the
13 second year,¹⁴ and has proposed a minimal review by the Commission, the reality is that this
14 request shifts risk to consumers without the scrutiny typically associated with a full rate case. In
15 addition to requesting a multi-year rate increase, Pittsburgh Water is also seeking to change how
16 its PENNVEST debt payments are recovered. Specifically, it is seeking to expand the PENNVEST
17 Charge to cover all loans, not just loans closed on and after January 1, 2025, which was the
18 Settlement terms of the last base rate case.¹⁵ It also proposes to revise the current tariff language
19 so that it is clear that the surcharge permits the recovery of interest and/or interest and principal
20 that is charged by PENNVEST prior to the completion of a PENNVEST-loan financed project.¹⁶
21 Currently, there is more than \$14 million per year recovered in rates from the repayment of

¹⁴ Pittsburgh Water St. 2 at 56.

¹⁵ Id. at 34.

¹⁶ Id. at 59-60.

1 principal and interest on PENNVEST loans. By seeking to move recovery of this to the surcharge
2 – as well as any new PENNVEST debt – Pittsburgh Water is ensuring that it receives almost a
3 guarantee of recovery of these charges without rate case scrutiny associated with these expenses.
4 This shifts risk from Pittsburgh Water to its customers.

5 Third, Pittsburgh Water has an approved DSIC that allows it to charge a 5% additional
6 surcharge on billed distribution revenue and has filed a petition that was consolidated with this
7 case to increase the charge for both water and wastewater to 7.5%.¹⁷ Unlike other utilities that
8 must wait until they reach the end of their fully projected future test year and their net plant in
9 service spending, Pittsburgh Water is allowed to recover its DSIC at a levelized rate over 12
10 months.¹⁸ This results in significant additional dollars charged to residential customers for the
11 benefit of Pittsburgh Water. Under present rates, customers would pay approximately \$7.4 million
12 for water and \$2.7 million for wastewater annually for the DSIC.¹⁹ If the increase is permitted, it
13 would result in water DSIC revenues of \$13.9 million in the FPFTY and \$14.9 million in FY 2027
14 and, for the wastewater DSIC revenues, \$5.0 million in FPFTY and \$5.4 million in FY 2027.²⁰
15 The DSIC reduces Pittsburgh Water’s risk that rates set in this case will be insufficient to meet
16 Pittsburgh Water’s planned capital plant investments, regardless of its administrative efficiency,
17 and shifts risks to consumers instead.

18 Together, these modifications to traditional ratemaking require substantial scrutiny by the
19 Commission in its exercise of discretion in setting rates, as they insulate Pittsburgh Water from
20 risk while increasing risk borne by consumers.

¹⁷ *Id.* at 63.

¹⁸ *Pa. Pub. Util. Comm’n v. Pittsburgh Water and Sewer Auth.*, R-2020-3017951, R-2020-3017970, P-2020-3019019 (Order entered December 3, 2020).

¹⁹ Pittsburgh Water St. 2 at 63.

²⁰ *Id.*

1 **Q: Will you be addressing each of these issues through this direct testimony?**

2 A: Not entirely. I do not further address the fully projected future test year projections, the
3 DSIC, or the PENNVEST issues in this case. I simply urge the Commission to pay attention to the
4 projections provided by the statutory advocates in contrast to those of Pittsburgh Water, as it is
5 critical for consumers that Pittsburgh Water is not permitted to overestimate its expenses or plant
6 in service numbers.

7 As to the DSIC, I do not further address it in my direct testimony. However, I would urge
8 the Commission to remember that allowing an increase in the DSIC by an additional 2.5% would
9 provide substantial additional capital and flexibility to Pittsburgh Water in its cash flow and
10 PAYGO funding. This reduces Pittsburgh Water’s risk of under collection of needed internally
11 generated funds and is meant to ensure that its projected capital improvement plan remains on
12 track. Additionally, since DSIC is a percentage-based charge, the amount Pittsburgh Water collects
13 in the future is based on its billed distribution revenue amounts. The higher the approved rates in
14 this proceeding, the more DSIC revenue Pittsburgh Water can collect – this is particularly true if
15 the Commission grants Pittsburgh Water accompanying petition to increase its DSIC percentage.
16 In my view, this is relevant to the overall reasonableness of rates set in this proceeding and should
17 not be overlooked by the Commission.

18 Similarly, I will not be addressing the proposed change in PENNVEST funding in this case,
19 but if the Commission approves this change, I urge the Commission to ensure that the \$14 million
20 that currently is in rates will in fact be removed effective March 3, 2026 when new rates go into
21 effect because those amounts will be collected through the new PENNVEST charge. If approved,
22 this charge – along with the increased flexibility permitted by the DSIC increase – would allow

1 the Authority significant cash flow flexibility that should be considered in setting the overall level
2 of rates.

3 **Q: Will you be addressing Pittsburgh Water’s request for use of a multi-year rate plan?**

4 A: Yes. I am opposed to a multi-year rate increase proposed by Pittsburgh Water and urge the
5 Commission to reject this proposal. I address this more fully in a separate section of my testimony.

6 **Q: Do you support Pittsburgh Water’s overall proposed rate increase?**

7 A: No, I do not support Pittsburgh Water’s proposed rate increase, as it is neither just nor
8 reasonable, and is not in the public interest. I urge the Commission to pay attention to the overall
9 revenue requirement presented by the statutory advocates in this proceeding and to consider their
10 projections in reaching its conclusion about the scope of the revenue increase that is permitted.
11 Pittsburgh Water’s current rates are already unaffordable for many Pittsburgh Water customers,
12 making critical water and wastewater services inaccessible for hundreds of families in Pittsburgh
13 Water’s service territory each year – in turn creating a cascade of consequences for the household
14 and the surrounding community. Further increasing rates will only exacerbate this existing
15 problem.

16 Continued access to affordable water and wastewater service is vital to consumers in
17 Pittsburgh Water’s service territory to staying in their homes and helping to make ends meet. This
18 is made more critical considering the current economic pressures that have fallen hard on
19 vulnerable consumers – especially low income consumers who face disproportionate water and
20 wastewater burden levels and associated rates of payment trouble and termination.

21 Fundamentally, I do not believe that rates are just and reasonable if they are not affordable
22 to those seeking service, such that all Pennsylvanians – regardless of income – can maintain safe
23 and affordable water and wastewater to their homes. As I will discuss, the data shows that low

1 income families are unable to afford to maintain service to their home at current rates, and any
2 further rate increase will serve to exacerbate levels of existing rate unaffordability. While
3 Pittsburgh Water’s Bill Discount Program (BDP) provides critical assistance to the poorest
4 households, additional improvements are necessary to ensure that Pittsburgh Water’s low income
5 customers can maintain affordable services considering the substantial, multi-year rate increase
6 proposed by Pittsburgh Water. It would be both unjust and unreasonable to approve any rate
7 increase at this time, absent additional mitigation measures to address existing rate unaffordability
8 and to fully remediate compounded unaffordability created by Pittsburgh Water’s proposal to
9 substantially increase rates.

10 Throughout my testimony, I provide several recommendations for how Pittsburgh Water
11 can structure its services so that low income customers in its service territory are better able to
12 maintain access to water, wastewater, and stormwater services to their homes. These
13 recommendations are critical to address rate affordability and service access issues regardless of
14 whether rates increase, but it is even more vital to mitigate additional financial harm for
15 economically vulnerable consumers if the Commission allows Pittsburgh Water to increase its
16 rates.

17 **III. Impact of Rate Increase on Low Income Households**

18 **a. Low Income Households**

19 **Q: How much income must a household earn each month to be considered low income?**

20 A: The Commission considers “low income” customers to be those whose income is at or
21 below 150% of the federal poverty level (FPL). The FPL is a measure of poverty based exclusively
22 on household income and size. It does not take into consideration the composition of the household
23 (i.e. whether the household consists of adults or children) or household’s geography.

1 Table 1 shows household income, by FPL and household size:

2 **Table 1: Annual Income at Federal Poverty Levels Percentage and Household Size.**²¹

Household Size	50%	100%	150%	200%	250%
1	\$7,825	\$15,650	\$23,475	\$31,300	\$39,125
2	\$10,575	\$21,150	\$31,725	\$42,300	\$52,875
3	\$13,325	\$26,650	\$39,975	\$53,300	\$66,625
4	\$16,075	\$32,150	\$48,225	\$64,300	\$80,375

3 For comparison, a full time (40 hours/week) worker making a minimum wage (\$7.25 per
 4 hour) has a gross annual income of \$15,080, assuming no time off (52 weeks/year). The maximum
 5 income for Pittsburgh Water’s low income programming is 200% of poverty. A family of four
 6 with household income at or below 200% FPL has a maximum gross annual income of \$64,300 –
 7 or \$5,358 per month – while a family of four with income at or below 50% FPL has a maximum
 8 gross annual income of just \$16,075 – or \$1,340 per month.²²

9 While FPL is the measure used most often for utility assistance programs, a more accurate
 10 benchmark meant to assess how much income a household needs to live without assistance in
 11 Pennsylvania is the Self-Sufficiency Standard. This standard measures the income that a family
 12 must earn to meet their basic needs and consists of the combined cost of six (6) basic needs –
 13 housing, child care, food, health care, transportation, and taxes – without the help of public
 14 subsidies.²³ Unlike the federal poverty level, which does not change based on geographic location
 15 or family composition, the Self Sufficiency Standard accounts for the varied costs of the six basic

²¹ U.S. Dept. of Health and Human Services, FPL, available at:
<https://aspe.hhs.gov/sites/default/files/documents/dd73d4f00d8a819d10b2fdb70d254f7b/detailed-guidelines-2025.pdf>. (last visited August 28, 2025)

²² See US Dept. of Health & Human Services, HHS Poverty Guidelines for 2025, available at:
<https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>. (last visited August 28, 2025)

²³ See PathWays PA, Overlooked and Undercounted 2019 Brief: Struggling to Make Ends Meet in Pennsylvania, available at: <http://www.selfsufficiencystandard.org/Pennsylvania>. (last visited August 28, 2025)

1 needs in different geographic areas and for differently aged household members.²⁴ For reference,
2 the average Self Sufficiency Standard in Allegheny County for a family of four with two adults
3 and two school aged children is approximately \$81,594 a year, this is \$33,369 more than a 4-
4 person household with income at 150% FPL makes in a given year.²⁵

5 **Q: How many customers in Pittsburgh Water’s service territory are considered low**
6 **income?**

7 A: There are several metrics to assess poverty levels in Pittsburgh Water’s Service territory.
8 Pennsylvania’s large public utilities track and classify their low income customer populations in
9 two ways – estimated low income customers and confirmed low income.²⁶ Per the Commission’s
10 definition of low income customers required for electric and gas jurisdictional utilities, a household
11 must have income at or below 150% of FPL to be considered low income. Pittsburgh Water tracks
12 low income customers – both estimated and confirmed – at a higher income level – those at or
13 below 200% of FPL which is consistent with their low income program eligibility.

14 When asked to identify estimated low income customers, Pittsburgh Water points to its
15 Household Affordability Analysis.²⁷ In the underlying data provided through discovery related to
16 the Household Affordability Analysis, Pittsburgh Water estimates that 26,834 customers in its
17 service territory are BDP eligible and thus have income that is at or below 200% of the FPL.²⁸

²⁴ Id.

²⁵ See PathWays PA, 2024 Self Sufficiency Standard Table, by County, available at:
<http://www.selfsufficiencystandard.org/pennsylvania>. (last visited August 28, 2025)

²⁶ See Pa. PUC, BCS, 2023 Report on Universal Service Programs & Collections Performance, at 6,7, available at:
[2023 universal service report-final rev041525.pdf](https://www.puc.pa.gov/2023-universal-service-report-final-rev041525.pdf). (last visited August 28, 2025)

²⁷ Pittsburgh Water response to OWT 1-7, attached hereto at Appendix B.

²⁸ Pittsburgh Water Exhibit JAM-12 at 39.

1 PWSA also tracks “confirmed low income customers.” Pittsburgh Water indicates that it
2 designates confirmed low income customers as those customers who are identified as having
3 household income at or below 200% FPL²⁹ through enrollment in the BDP; when a customer
4 qualifies for payment arrangement; after a customer receives a Hardship Fund grant or
5 ALCOSAN³⁰ Clean Water Assistance Fund grant; or attestation through telephone conversations
6 with a Customer Service Representative or PHG2O Cares team.³¹ As of April 2025, Pittsburgh
7 Water reports that 7,265 of its customers are confirmed to be low income.³²

8 **Q: Do you have any concerns about Pittsburgh Water’s confirmed low income customer**
9 **count?**

10 A: Yes. I am concerned that Pittsburgh Water’s identification and classification of its
11 confirmed low income (CLI) customers are unnecessarily restrictive and has resulted in an
12 undercounting of its low income customers. I also question the accuracy of Pittsburgh Water’s
13 tracking and the integrity of its data, as it reports various numbers when asked for its CLI customer
14 count.

15 As an initial concern, it appears that there are reporting discrepancies. As of the most recent
16 data available (April 2025), Pittsburgh Water indicates that 7,265 of its customers were classified
17 as *confirmed* low income customers.³³ However, Pittsburgh Water also reports 8,397 BDP
18 participants as of that same date.³⁴ Pittsburgh Water indicates that its confirmed low income count
19 is inclusive of all BDP participants – in addition to multiple other confirmation methods. It is

²⁹ Pittsburgh Water response to OWT 1-5; OWT 1-6, attached hereto at Appendix B.

³⁰ ALCOSAN is the Allegheny County Sanitary Authority. It provides the actual wastewater treatment of all wastewater the flows through Pittsburgh Water’s system.

³¹ Id.

³² Pittsburgh Water response to OWT 1-3, Attachment, attached hereto at Appendix B.

³³ Pittsburgh Water response to OWT 1-3, Attachment, attached hereto at Appendix B.

³⁴ Pittsburgh Water response to OWT 4-31.A., Attachment, attached hereto at Appendix B.

1 unclear how Pittsburgh Water’s count of BDP enrollees for April 2025 was *higher than* its
2 confirmed low income customer count because BDP customer income, by definition, must be at
3 or below 200% FPL. As such, all BDP customers should be included in the Pittsburgh Water’s
4 count of confirmed low income customers.

5 **Q: Why is an inclusive and accurate count of CLI customers important?**

6 A: An inclusive and accurate count of low income customers is essential to determining the
7 adequacy and accessibility of Pittsburgh Water’s low income assistance programs; so that
8 Pittsburgh Water’s low income customers can access protection from the Winter Moratorium
9 Program; to assess Pittsburgh Water’s performance relative to economic need across its service
10 territories; and to identify solutions which are equitable to all Pittsburgh Water customers,
11 regardless of income.

12 Since there is inconsistent and seemingly unreliable information available about the actual
13 number of confirmed low income customers served by Pittsburgh Water, I will be using the
14 estimated low income customer count of 26,834 provided by the Authority in response to discovery
15 as it appears to me a more accurate baseline for the purpose of evaluating the affordability of
16 Pittsburgh Water’s rates and the accessibility and affordability of its low income assistance
17 programs. Regardless of the measure, there are a substantial number of low income customers in
18 Pittsburgh Water’s service territory who need to be considered in any decision regarding just,
19 reasonable, and affordable rates.

1 **b. Impact of Rate Increase on Low Income Households**

2 **Q: How would PWSA’s proposed rate increase impact low income households?**

3 A: The rate increase proposed by Pittsburgh Water is likely to cause increased arrearages
4 which lead to service terminations for low income consumers or, in the alternative, will cause low
5 income households to go without other critical life necessities such as food, medicine, childcare,
6 and other essential services to afford water, wastewater, and stormwater services.

7 Water terminations pose a serious threat to public health and human dignity. Termination
8 of water service:

- 9 • Renders families unable to cook, bathe, clean, or flush the toilet;³⁵
- 10 • Is tied directly to the health and well-being of the household, and the habitability
11 of the home;³⁶
- 12 • Is often akin to eviction from a home. A home may be deemed uninhabitable or
13 even condemned following termination of water service, forcing families to vacate
14 with little to no notice;³⁷
- 15 • Jeopardizes a parent’s custody of their children;³⁸
- 16 • Can result in the loss of housing assistance, and is often cited as a catalyst for
17 homelessness.³⁹

³⁵ Water/Color Report at 28.

³⁶ Id.

³⁷ Coty Montag, Water/Color: A Study of Race and the Water Affordability Crisis in America’s Cities, NAACP Legal Defense and Educational Fund, Inc, May 2019, at p. 28, (hereinafter “Water/Color Report”) available at: https://www.naacpldf.org/wp-content/uploads/Water_Report_FULL_5_31_19_FINAL_OPT.pdf. (last visited August 28, 2025)

³⁸ See Joint State Government Commission, General Assembly of the Commonwealth of Pennsylvania, Homelessness in Pennsylvania: Causes, Impacts, and Solutions: A Task Force and Advisory Committee Report (2016), available at: <http://jsg.legis.state.pa.us/resources/documents/ftp/documents/HR550%201%20page%20summary%204-6-2016.pdf>. (last visited August 28, 2025)

³⁹ See Joint State Government Commission, General Assembly of the Commonwealth of Pennsylvania, Homelessness in Pennsylvania: Causes, Impacts, and Solutions: A Task Force and Advisory Committee Report (2016), available at: <http://jsg.legis.state.pa.us/resources/documents/ftp/documents/HR550%201%20page%20summary%204-6-2016.pdf>. (last visited August 28, 2025)

1 At Pittsburgh Water’s current rates, many families already make difficult choices between
 2 paying for utility services and other necessities. Even in relatively good economic times, low
 3 income families struggle to make ends meet each month. Any increases in the cost of essential
 4 services, like water and wastewater, will severely impact low income households’ ability to afford
 5 and, in turn, maintain these critical life necessities.

6 As shown in its Cost of Service Study, Pittsburgh Water’s residential customers will see
 7 steep increases in their monthly bills depending on their usage:

8 **Table 2: Residential Bill Impacts from Proposed Rate Increase in Dollars**

Customer Impacts				FY 2026	FY 2027	FY 2026	FY 2026
<i>Residential</i>				<i>FTY</i>	<i>FPFTY</i>	<i>% Changes</i>	<i>\$ Changes</i>
5/8"	1 kgal	Tier 1		\$ 52.08	\$ 63.61	22.1%	\$ 11.52
5/8"	3 kgal	Tier 2		\$ 123.02	\$ 135.49	10.1%	\$ 12.48
5/8"	5 kgal	Tier 2		\$ 187.78	\$ 201.07	7.1%	\$ 13.29
5/8"	7 kgal	Tier 2		\$ 252.54	\$ 266.64	5.6%	\$ 14.10

9
 10 At current rates, residential customer with a 5/8” meter, a usage level of 3,000
 11 gallons/month and a Tier 2 stormwater fee, has a monthly bill of \$100.27 and will see it increased
 12 to \$123.02 in FY 2026 and \$135.49 in FY 2027 under Pittsburgh Water’s proposal.⁴⁰ While this is
 13 the average usage modeled by Pittsburgh Water, at least 1/3 of all customers have usage that
 14 exceeds this amount and, thus, will face a considerably higher increase. This includes a significant
 15 number of low income customers within Pittsburgh Water’s territory, whose usage exceeds 3,000
 16 kgal.⁴¹

⁴⁰ See Pittsburgh Water Cost of Service Study, “Impacts 26” tab, Cells G173 and H173, Current Rates to Proposed 2026 rates and “Impacts_27_No_Min” tab, cells G173 and H173, Proposed 2026 to Proposed 2027 rates.

⁴¹ Pittsburgh Water response to OWT 3-42, Attachment (showing that between 40-42% of BDP households have usage that is greater than 3,000 gallons per month for each year from 2022 – 2025). See also Table 7, infra.

1 Low income customers will see particularly pronounced levels of unaffordability at
2 proposed rates. A water, wastewater, and stormwater “burden” is defined as the percentage of
3 income a household pays towards its water, wastewater, and stormwater costs.⁴² While there is no
4 statutory or regulatory standard for water and wastewater affordability in Pennsylvania, the current
5 consensus amongst many experts is that – to be considered affordable – the combined cost for
6 water and wastewater service should not exceed 2.5-4% of household income.⁴³ For purposes of
7 this case, I would include stormwater costs within these burdens as well. Pittsburgh Water
8 customers pay significantly more than these water and wastewater burden levels at proposed rates.

9 OWT Exhibit 1-a through 1-c, attached to my direct testimony, show the relative water,
10 wastewater, and stormwater burdens for 2, 3, and 4- person households with income between 50%
11 - 200% FPL. As these Exhibits show, both at current and proposed 2026-2027 rates, Pittsburgh
12 Water’s rates exceed acceptable levels of affordability for many low income customers –
13 particularly those with lower income and higher usage levels.

14 For example, a 4-person household at 50% FPL, using 3,000 gallons/month at 2027
15 proposed rates, has a combined burden level of approximately 13%. By way of another example,
16 a 4-person household at 50% FPL, using 6,000 gallons/month at 2027 proposed rates, has a burden

⁴² Nina Lakhani and Juweek Adolphe, Key findings: the Guardian's water poverty investigation in 12 US cities, the Guardian (June 26, 2020), available at: <https://www.theguardian.com/us-news/2020/jun/26/running-drinking-water-poverty-us-cities> (last visited August 28, 2025); Roger Colton, The Affordability of Water and Wastewater Service in Twelve US Cities, The Guardian (May 2020), available at: <https://www.theguardian.com/environment/2020/jun/23/full-report-read-in-depth-water-poverty-investigation>. (last visited August 28, 2025)

⁴³ See, e.g., US Water Alliance, The Invisible Crisis: Water Affordability in the United States, at 33 (May 2016), available at: https://www.uusc.org/sites/default/files/the_invisible_crisis_web.pdf (last visited Sept. 2, 2025); NAACP Legal Defense and Educational Fund, Inc., Water/Color: A Study of Race & The Water Affordability Crisis in America’s Cities (2019), available at: https://www.naacpldf.org/wp-content/uploads/Water_Report_FULL_5_31_19_FINAL_OPT.pdf (last visited August 28, 2025); Roger Colton, The Affordability of Water and Wastewater Service in Twelve US Cities, The Guardian (May 2020), available at: <https://www.theguardian.com/environment/2020/jun/23/full-report-read-in-depth-water-poverty-investigation>. (last visited August 28, 2025)

1 level of approximately 23%. As I will discuss in detail below, BDP enrollment will lessen – though
2 not eliminate – unaffordability for some low income customers with higher usage. However,
3 Pittsburgh Water’s BDP continues to provide only limited relief to customers at the low end of the
4 poverty scale, and those with higher usage levels. It is again worth noting that of the more than
5 26,000 estimated BDP-eligible households within Pittsburgh Water’s service territory, only
6 slightly more than 8,000 low income customers are enrolled in BDP. This means that the vast
7 majority of Pittsburgh Water’s low income customers – approximately 18,000 – are paying these
8 extraordinary burdens. For ease of reference, I have inserted a condensed version of the FY 2026
9 and FY 2027 burdens at Pittsburgh Water’s proposed rates and discount levels Table 3 and Table
10 4 below. A more comprehensive version is attached as Exhibit 1-b and 1-c to this testimony:

1

Table 3: FY 2026 Burdens at Proposed Rates; 2-4 Person HH; 50-200% FPL

FY 2026 BURDENS AT PROPOSED RATES								
2 Person Household								
	Burden at Full Tariff 2026	Burden at BDP 2026	Burden at Full Tariff 2026	Burden at BDP 2026	Burden at Full Tariff 2026	Burden at BDP 2026	Burden at Full Tariff 2026	Burden at BDP 2026
	1000 Gal.		3000 Gal		6000 Gal		8000 Gal	
50% FPL	9%	3%	19%	8%	35%	17%	45%	23%
100% FPL	5%	1%	10%	6%	17%	13%	22%	18%
150% FPL	3%	1%	6%	4%	12%	9%	15%	12%
200% FPL	2%	<1%	5%	3%	9%	7%	11%	9%
3 Person Household								
	Burden at Full Tariff 2026	Burden at BDP 2026	Burden at Full Tariff 2026	Burden at BDP 2026	Burden at Full Tariff 2026	Burden at BDP 2026	Burden at Full Tariff 2026	Burden at BDP 2026
	1000 Gal.		3000 Gal		6000 Gal		8000 Gal	
50% FPL	7%	2%	15%	7%	27%	13%	35%	18%
100% FPL	4%	1%	8%	5%	14%	10%	18%	14%
150% FPL	2%	<1%	5%	3%	9%	7%	12%	9%
200% FPL	2%	<1%	4%	2%	7%	5%	9%	7%
4 Person Household								
	Burden at Full Tariff 2026	Burden at BDP 2026	Burden at Full Tariff 2026	Burden at BDP 2026	Burden at Full Tariff 2026	Burden at BDP 2026	Burden at Full Tariff 2026	Burden at BDP 2026
	1000 Gal.		3000 Gal		6000 Gal		8000 Gal	
50% FPL	6%	2%	13%	5%	23%	11%	29%	15%
100% FPL	3%	1%	6%	4%	11%	9%	15%	12%
150% FPL	2%	<1%	4%	3%	8%	6%	10%	8%
200% FPL	2%	<1%	3%	2%	6%	4%	7%	6%

1 **Table 4: FY 2027 Burdens at Proposed Rates; 2-4 Person HH; 50-200% FPL**

FY 2027 BURDENS AT PROPOSED RATES								
2 Person Household								
	Burden at Full Tariff 2027	Burden at BDP 2027	Burden at Full Tariff 2027	Burden at BDP 2027	Burden at Full Tariff 2027	Burden at BDP 2027	Burden at Full Tariff 2027	Burden at BDP 2027
	1000 Gal.		3000 Gal.		6000 Gal.		8000 Gal.	
50% FPL	10%	3%	20%	8%	36%	17%	46%	23%
100% FPL	5%	1%	10%	6%	18%	13%	23%	18%
150% FPL	3%	1%	7%	4%	12%	9%	15%	12%
200% FPL	3%	1%	5%	3%	9%	7%	11%	9%
3 Person Household								
	Burden at Full Tariff 2027	Burden at BDP 2027	Burden at Full Tariff 2027	Burden at BDP 2027	Burden at Full Tariff 2027	Burden at BDP 2027	Burden at Full Tariff 2027	Burden at BDP 2027
	1000 Gal.		3000 Gal		6000 Gal		8000 Gal	
50% FPL	8%	2%	16%	7%	28%	14%	36%	18%
100% FPL	4%	1%	8%	5%	14%	11%	18%	14%
150% FPL	3%	1%	5%	3%	9%	7%	12%	10%
200% FPL	2%	<1%	4%	2%	7%	5%	9%	7%
4 Person Household								
	Burden at Full Tariff 2027	Burden at BDP 2027	Burden at Full Tariff 2027	Burden at BDP 2027	Burden at Full Tariff 2027	Burden at BDP 2027	Burden at Full Tariff 2027	Burden at BDP 2027
	1000 Gal.		3000 Gal		6000 Gal		8000 Gal	
50% FPL	7%	2%	13%	6%	23%	11%	30%	15%
100% FPL	3%	1%	7%	4%	12%	9%	15%	12%
150% FPL	2%	<1%	4%	3%	8%	6%	10%	8%
200% FPL	2%	<1%	3%	2%	6%	4%	8%	6%

2 I note that it is both appropriate and necessary to take into consideration customers with
 3 higher usage levels when analyzing the affordability of Pittsburgh Water’s rates. As I will discuss
 4 below, Pittsburgh Water relies on a monthly usage level of 3,000 gallons in its updated Household
 5 Affordability Analysis, which creates an unrealistic picture of household usage and affordability.

1 A significant percentage of Pittsburgh Water’s low income customers have monthly usage
 2 levels well past the 3,000 gallons/ month. The table below shows the percentage of BDP household
 3 who have usage levels per month above 3,000 gallons/month between 2022 and to date in 2025:

4 **Table 5: Percent BDP HH above 3,000 gallons/month (2022 to 2025) by Tranche⁴⁴**

Year	>3 Kgal and ≤ 4 Kgal	>4 Kgal and ≤ 5 Kgal	>5 Kgal and ≤ 6 Kgal	> 6 Kgal
2022	15%	10%	5%	10%
2023	15%	11%	7%	9%
2024	15%	11%	6%	10%
2025	14%	10%	7%	11%

5 The above data shows that from 2022-2025, 40%-42% of BDP customers had usage above
 6 the median usage of 3,000 gallons. This is likely due to several factors. First, low income customers
 7 with higher usage levels may enroll in the BDP at higher rates – or report their income to seek a
 8 payment arrangement – thus resulting in higher average usage rates for these groups. Second, low
 9 income households are more likely to live in older homes with inadequate, damaged, or leaky
 10 plumbing/ fixtures – and may experience higher usage levels as a result.⁴⁵ These households are
 11 less likely to be able to afford to fix leaks, damaged plumbing or customer-side service lines, or
 12 purchase and install water efficiency devices.⁴⁶ The amount of water necessary to meet basic needs
 13 therefore varies significantly for each family – based not only on household composition, but also
 14 on the quality and condition of their home.

⁴⁴ Pittsburgh Water response to OWT 3-42, Attachment, attached hereto at Appendix B.

⁴⁵ Gary Adamkiwicz et al., Moving Environmental Justice Indoors: Understanding Structural Influences on Residential Exposure Patterns in Low Income Communities, 101 Am. J. Public Health 238-245 (2016), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3222513/> (finding that low income households have a higher likelihood of inside water leaks, which in turn leads to increased mold and moisture in the home that can cause or complicate the health of family members) (last visited August 28, 2025); see also US Dep’t of Health, Office of Disease Prevention & Health Promotion, Social Determinants of Health: Quality of Housing (2020), available at: <https://health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/quality-housing>. (last visited August 28, 2025)

⁴⁶ Id.

1 **Q: Is there other evidence that Pittsburgh Water’s low income customers already**
 2 **struggle to afford basic water, wastewater, and stormwater services – even at present rates?**

3 A: Yes. There are several indicators which show that Pittsburgh Water’s low income
 4 customers are already struggling to afford services, even before any rate increase is approved
 5 through the present proceeding. As the table below shows, even with the assistance of the BDP,
 6 Pittsburgh Water’s low income customers have carried substantial arrearage levels compared to
 7 residential customers overall.

8 **Table 6: Average Arrearages** ⁴⁷

Point in Time	Average Arrears, Res. Customers	Average Arrears BDP Customers	Average Arrears, CLI non-BDP Customers
Dec. 2022	\$996.86	\$1,178.25	\$2,195.94
Dec. 2023	\$441.42	\$1,317.47	\$2,224.74
Dec. 2024	\$483.15	\$1,391.33	\$2,276.22
Jun. 2025	\$452.84	\$1,439.88	\$2,356.43

9 As the above table shows, as of June 2025, Pittsburgh Water’s confirmed low income
 10 customers who were not enrolled in the BDP had an average arrearage level more than *five times*
 11 *higher* than the average arrearage level of residential customers overall. While enrollment in the
 12 BDP appears to have lessened the average arrears carried by program participants, BDP customers
 13 continue to carry average arrears substantially higher than residential customers overall.

14 Notably, wastewater costs appear to be a significant driver of arrearages of Pittsburgh
 15 Water’s low income customers. The following table shows the mean arrearages for BDP, and low

⁴⁷ Pittsburgh Water response to OWT 1-19, Attachment, “Residential”; “Confirmed Low Income no BDP”; “BDP”, attached hereto at Appendix B.

1 income customers who have not enrolled in the BDP, as of June 2025 disaggregated by utility
 2 type:

3 **Table 7: Average CLI Arrearages as of June 2025 Disaggregated by Utility Type⁴⁸**

	Water Only	Wastewater Only	Combination
CLI, non BDP	\$593.46	\$1,328.02	\$1,746.28
BDP	\$791.55	\$1,244.57	\$1,564.97

4
 5 As the above Table shows, Pittsburgh Water’s low income customers who only have
 6 wastewater services have significantly higher average arrearages compared to water only
 7 customers – regardless of whether low income customers have been able to enroll in the BDP.
 8 These figures underscore the need to ensure that low income customers can achieve affordable
 9 monthly bills across service types.

10 **Q: Should Pittsburgh Water’s requested rate increase be viewed in a vacuum?**

11 A: No. Pittsburgh Water’s rates should not be viewed in a vacuum when looking at levels of
 12 unaffordability faced by low income households. Pennsylvania’s consumers face a myriad of
 13 economic pressures, including high levels of inflation on the costs of basic goods and services.⁴⁹

14 In addition to these general economic pressures, Pennsylvania’s consumers have seen their
 15 overall utility bills increase in recent years, including the costs which they are required to pay for
 16 energy. In addition to the multiple increases to Pittsburgh Water rates borne by consumers, as
 17 discussed, consumers have had to contend with steep increases to their energy costs. For example,
 18 the below table shows how energy bills have increased for a resident of Allegheny County, based

⁴⁸ Pittsburgh Water response to OWT 1-20, Attachments, attached hereto at Appendix B.
⁴⁹ Tim Smart, Jaelyn Jeffrey-Wilensky, [How Bad Is Inflation?](https://money.usnews.com/money/personal-finance/articles/how-bad-is-inflation-tracking-the-price-of-eggs-housing-and-gas), U.S. News (Aug. 12, 2025), available at: <https://money.usnews.com/money/personal-finance/articles/how-bad-is-inflation-tracking-the-price-of-eggs-housing-and-gas>. (last visited August 28, 2025)

1 on the data from the Commission’s Rate Comparison Reports, for a customer with baseload
 2 electric service from Duquesne Light Company, and gas service from Peoples Gas or Columbia
 3 Gas, and who utilizes average usage levels for residential customers of 500kWh and 15 Mcf, per
 4 month, on average, respectively:

5 **Table 8: Duquesne Light Company (DLC) and Peoples and Columbia Gas,**
 6 **Rate Comparison (2018, 2025)⁵⁰**

	DLC \$/month at 500kwh	Peoples Gas \$/month at 15 Mcf	Columbia Gas \$/month at 15 Mcf
2018	\$84.27	\$144.22	\$184.63
2025	\$117.15	\$176.73	\$289.10
% Increase	39%	23%	57%

7 As the above table shows, customers in Pittsburgh Water’s service territory who also have
 8 Duquesne and Peoples Gas or Columbia Gas service have seen significant increases to their overall
 9 utility costs in recent years. As discussed, Pittsburgh Water’s rapid increases to their basic rates of
 10 service in these past several years have already added to the increased unaffordability faced by
 11 consumers in these communities. In my view, these are factors that the Commission must consider
 12 when assessing the overall affordability of utility rates including those of Pittsburgh Water. If
 13 Pittsburgh Water is permitted to increase its rates as it is proposing in this proceeding, its low
 14 income customers will face even more pronounced challenges to affording their monthly bills, and
 15 making ends meet each month.

16 To be clear, however, Pittsburgh Water’s own basic rates have increased substantially in
 17 recent years. Pittsburgh Water’s proposal to increase its basic rates in the context of the present
 18 proceeding represents an instance in a series of rate increases Pittsburgh Water has implemented

⁵⁰ Pa. PUC, 2018 Rate Comparison Report, available at:
https://www.puc.pa.gov/general/publications_reports/pdf/Rate_Comparison_Rpt2018.pdf (last visited August 22,
 2025); Pa. PUC, 2025 Rate Comparison Report, available at:
https://www.puc.pa.gov/media/3429/2025_rate_comparison_report.pdf. (last visited August 22, 2025)

1 since 2016. Pittsburgh Water’s most recent increase was approved via Commission Order entered
 2 on January 18, 2024.⁵¹ In its Order, the Commission permitted Pittsburgh Water to file revised
 3 tariffs on or after February 15, 2024.⁵²

4 As shown by the table below, Pittsburgh Water’s rates have increased from 2016 to
 5 proposed rates in 2027, for residential customers between 2,000 and 5,000 gallons/month of usage:

6 **Table 9: Residential Rates, 2016 vs. Current v. Proposed 2027⁵³**

Residential Water/WW Service	2016	Current	% Increase Since 2016	Proposed (2027)	% Increase: 2016 to proposed 2027 Rates
Total Bill (2,000 G)	\$30.25	\$76.56	153%	\$99.05	227%
Total Bill (3,000 G)	\$39.90	\$ 100.77	153%	\$128.47	222%
Total Bill (4,000 G)	\$49.55	\$124.98	152%	\$157.90	219%
Total Bill (5,000 G)	\$59.20	\$149.19	152%	\$187.32	216%

7 As shown above, residential customers have already seen their monthly Pittsburgh Water
 8 bills more than double since 2016, and if Pittsburgh Water is permitted to increase its base rates
 9 as it proposes through the present proceeding, by 2027 residential customers will see between a
 10 216%-227% increase to their monthly bills compared to 2016. These increases are untenable and
 11 cannot simply be absorbed by customers who have not seen a corresponding increase to their
 12 monthly incomes.⁵⁴ While low income customers may mitigate *some* of this increased

⁵¹ Pa. PUC v. PWSA, Order, Docket Nos. R-2023-3039919, et al (Order entered Jan. 18, 2024).

⁵² Id.

⁵³ See PWSA Notice of Rate Change (2016), available at: http://apps.pittsburghhpa.gov/pwsa/Rate_Brochure-2016.pdf. (last visited August 22, 2025) Pittsburgh Water Exhibits JAM-15; JAM-17; Jam-19. Assuming a 5/8” meter size. Current and Proposed 2027 Rates utilize a Tier 2 stormwater fee for calculation purposes. Inclusive of 5% DSIC in current rates; and 7.5% DSIC and \$2.13 PENNVEST Charge in 2027 proposed rates.

⁵⁴ By way of comparison, the median weekly earnings of all wage earners in the country in Q1 2016 was \$823. In Q1 2025, the median weekly wage was \$1,206. This is an increase of \$383 per week or 46% during this period. See Bureau of Labor Statistics, Usual Weekly Earnings, Median Usual Weekly Earnings of full-time wage and salary workers by sex, Show Table, Column 1 (Total). Available at: <https://www.bls.gov/charts/usual-weekly-earnings/usual-weekly-earnings-over-time-total-men-women.htm#> (last visited August 28, 2025). During this same

1 unaffordability by enrolling in the BDP, BDP does not entirely mitigate affordability particularly
2 for higher usage households. Additionally, as discussed throughout this testimony, many low
3 income customer have not been able to enroll in the BDP – and are therefore subject to the
4 unmitigated impact of unaffordability, both at current and proposed rates.

5 **Q: Are low income customers who are enrolled in Pittsburgh Water’s BDP protected**
6 **from the financial impact of the proposed rate increase?**

7 A: Only to an extent. I address Pittsburgh Water’s proposed changes to its BDP in detail in
8 Section V below. My analysis shows that BDP is effective in reducing but not eliminating
9 unaffordability for low income customers at both present and proposed rates. As discussed in detail
10 below, Pittsburgh Water is proposing to revise the discounts offered through its BDP because of
11 its proposal to eliminate its minimum usage charge. However, even assuming Pittsburgh Water’s
12 proposed changes to its BDP are approved, Pittsburgh Water’s BDP provides inconsistent bill
13 affordability to its customers, with customers who have lower incomes and higher usage levels
14 continuing to receive unaffordable monthly bills. In addition, the ability of the BDP to offset
15 unaffordability, both at present and proposed rates, is hamstrung by low BDP enrollment levels.
16 Low income customers who are not enrolled in the BDP shoulder unmitigated monthly bills at full
17 tariff rates and will bear the full extent of any rate increase approved for residential customers
18 through the present proceeding.

period, inflation was measured by the Consumer Price Index was approximately 34%. See CPI Inflation Calculator, Bureau of Labor Statistics, comparing \$100 in January 2016 to January 2025, available at: https://www.bls.gov/data/inflation_calculator.htm (last visited August 28, 2025). Either measure is significantly lower than the more than the 200% increase in Pittsburgh Water’s bills during this same period.

IV. Overview, Customer Charge, Rate Design, and Alternative Ratemaking

a. Residential Rate Design

Q: Please summarize Pittsburgh Water’s existing residential rate class and rate design.

A: Pittsburgh Water’s residential customers fall into two categories – general residential customers and residential BDP customers. The current rate structure for residential customers for both water and wastewater consists of a monthly minimum Charge that varies by meter size and a volumetric charge.

Table 10: Current Residential Rate Design⁵⁵

Service Type	Minimum Charge \$/month, 5/8” Meter, includes 1 kgal of usage	Volumetric Charge \$/kgal
Water	\$31.54	\$16.38
Wastewater	\$8.25	\$6.68

Pittsburgh Water witness Harold Smith asserts that the Minimum Charge is intended to recover Pittsburgh Water’s customer costs as well as some of Pittsburgh Water’s costs associated with providing capacity to meet customer demand, as well as the cost of a water and wastewater usage allowance of the first 1,000 gallons.⁵⁶ The volumetric charge is designed to recover Pittsburgh Water’s costs that vary based on customer demand as well as the portion of Pittsburgh Water’s fixed costs that are not recovered through the Minimum Charge.⁵⁷

⁵⁵ Pittsburgh Water and Sewer Authority, Supplement No. 14, Tariff Water – Pa. P.U.C. No. 1, Third Revised Page No. 8 and Original Page 8A. Available at: https://www.pgh2o.com/sites/default/files/2024-12/CURRENT%20-%20dba%20Pittsburgh%20Water_Water%20Tariff%20Thru%20%20Supp%2015.pdf (last visited Sept. 1, 2025). See also, Pittsburgh Water and Sewer Authority, Supplement No. 13, Tariff Wastewater – Pa. P.U.C. No. 1, Third Page 9 and Original Page 9A., available at: https://www.pgh2o.com/sites/default/files/2024-12/CURRENT%20-%20dba%20%20Pittsburgh%20Water_Wastewater%20Tariff%20thru%20Supp%2014.pdf. (Last visited Sept. 1, 2025). Exhibit JAM-12 at 18.

⁵⁶ Pittsburgh Water St. 8 at 30; 44.

⁵⁷ Id.

1 In addition to the charges outlined above, Pittsburgh Water recovers its storm water costs
 2 based on a three-tier rate structure that assesses a flat monthly fee based on what is called an
 3 Equivalent Residential Unit (ERU), which is equivalent to the amount of impervious area on a
 4 property. Most residential customers fall within tier 2, which is 1 ERU and is currently assessed at
 5 \$10.06 per month.⁵⁸

6 **Q. How do low income customers fit within the residential rate class?**

7 A. The vast majority of Pittsburgh Water’s low income customers are not enrolled in
 8 Pittsburgh Water’s Bill Discount Program and, thus, are served under the same rates as all other
 9 general residential rate classes. Customers enrolled in BDP currently receive certain percentage
 10 discounts of these charges. Pittsburgh Water proposes in this proceeding to additionally provide
 11 its BDP participants with certain flat credits. I will outline and discuss Pittsburgh Water’s existing
 12 and proposed BDP structure in Section V of my direct testimony.

13 **Q. Please summarize Pittsburgh Water’s proposed rate design for its residential**
 14 **customers.**

15 A. Pittsburgh Water is proposing to maintain its current rate design for rates that go into effect
 16 in March 2026. Under those rates, Pittsburgh Water proposes the following increases:

17 **Table 11: Proposed Rates for 2026 (FPFTY)⁵⁹**

Service Type	Minimum Charge \$/month, 5/8” Meter, includes 1 kgal of usage	Volumetric Charge \$/kgal
Water	\$34.34	\$19.42
Wastewater	\$8.37	\$7.69

⁵⁸ Pittsburgh Water St. 8, Exhibit HJS-13SW.

⁵⁹ Pittsburgh Water St. 8, Exhibit HJS-12W and 11WW.

1 The 2026 rates for stormwater increase for Tier 2, which is the equivalent of 1 ERU, is
 2 \$12.34.⁶⁰ For the second year of the increase, beginning in 2027, Pittsburgh Water has proposed
 3 to remove the minimum allowance from the Minimum Charge⁶¹ and flow all usage-based charges
 4 through the volumetric charge. The rate design for 2027 with this change would be:

5 **Table 12: Proposed Rates for 2027⁶²**

Service Type	Service Charge \$/month, 5/8” Meter, (No usage)	Volumetric Charge \$/kgal
Water	\$18.81	\$19.98
Wastewater	\$3.99	\$7.39

6 The 2027 rates for stormwater increase for Tier 2, which is the equivalent of 1 ERU, is
 7 \$12.62.⁶³

8 **Q. Do you have concerns about Pittsburgh Water’s proposed rate design?**

9 A. I support Pittsburgh Water’s decision to remove the minimum usage amount from its
 10 monthly service charge and charge for all usage on a volumetric basis. This will help improve bill
 11 clarity, increase transparency, and promote conservation. However, my support for this change is
 12 inextricably tied to my recommendations for revising Pittsburgh Water’s BDP and Arrearage
 13 Forgiveness Program (AFP) to ensure that households are able to achieve affordable monthly bills,
 14 even with the removal of the minimum allowance. As I discuss later in my testimony, removal of
 15 the minimum allowance from the monthly charge would adversely impact the structural design of
 16 Pittsburgh Water’s BDP tiered discount structure, in turn harming current and future program
 17 participants. Thus, the programmatic changes I recommend to both the BDP and AFP – along with

⁶⁰ Pittsburgh Water St. 8 at 51, Exhibit HJS9SW.

⁶¹ Pittsburgh Water was also proposed renaming the charge a monthly Service Charge. Pittsburgh Water St. 8 at 34.

⁶² Pittsburgh Water St. 8, Exhibit HJS-21W; 20WW; and 21WW.

⁶³ Pittsburgh Water St. 8 at 51, Exhibit HJS 9SW.

1 the improvements and additional changes that I recommend below – are necessary changes that
2 must be made in conjunction with any rate increase. However, as noted below, I do not support
3 Pittsburgh Water’s decision to request a multi-year rate plan. Given this, in addition to making the
4 critical programmatic changes to safeguard its BDP and AFP, Pittsburgh Water should be required
5 to remove its minimum charge and change its BDP structure with the effective date of rates in this
6 proceeding rather than in 2027.

7 **b. Multiyear Rate Plan (MYRP)**

8 **Q. What does Pittsburgh Water assert is the need for its multi-year rate plan?**

9 A. According to Pittsburgh Water witness Barca, the second-year increase is necessary
10 because “if the multi-year increase requested in this rate case is not approved, Pittsburgh Water
11 will be forced to make significant reductions to its FY 2027 [Capital Improvement Plan] CIP
12 budget.”⁶⁴ Mr. Barca asserts that “setting rates using a ‘test year’ concept—with the assumption
13 that the revenue requirement in the test year will reflect what Pittsburgh Water will experience not
14 only in that year but in subsequent years . . . is just not valid for a cash flow-regulated utility.”⁶⁵
15 Mr. Barca also asserts that it would promote administrative efficiencies because it would allow
16 Pittsburgh Water to “break the cycle of having to file a rate increase every 2-3 years in order to
17 recover its increased costs.”⁶⁶

18 **Q. What is your response?**

19 A. I do not support a multi-year rate request as it would permit an automatic increase for
20 Pittsburgh Water in 2027 at the expense of its customers without the full scrutiny of a rate case.
21 While I understand the desire by Pittsburgh Water to seek guarantees in its recovery of additional

⁶⁴ Pittsburgh Water St. 2 at 29:3-7.

⁶⁵ Pittsburgh Water St. 2 at 54:11-15.

⁶⁶ *Id.* at 54:22-23.

1 revenue after the fully-projected future test year, the use of a multiyear rate increase imposes a
2 significant burden on the Authority’s customers, specifically its low income customers who – as I
3 have outlined in this testimony – have significant difficulty paying their bills without assistance.
4 Furthermore, I do not agree with Mr. Barca that setting rates on a test year concept – especially
5 one that is fully projected – deprives Pittsburgh Water of the tools or revenue needed to manage
6 its revenue, expenses, and other costs. The simple reality is that based on the rates that will be set
7 in this case, Pittsburgh Water will begin collecting revenue in March 2026 based on the world as
8 it projects it to be in January 2027 and, thus, receives significant benefits from these future
9 projections already. Furthermore, while there are certainly administrative efficiencies to Pittsburgh
10 Water from this process, those efficiencies come at the expense of transparency and accountability
11 for customers.

12 Moreover, Pittsburgh Water has also requested several other changes in this proceeding
13 that would allow it to generate the revenue needed to ensure that it can meet its capital
14 improvement plan. For example, it has requested an increase in the DSIC cap from 5% to 7.5%,
15 which alone would generate millions of dollars in additional revenue each year from customers.
16 Additionally, Pittsburgh Water has proposed a change to its PENNVEST Surcharge recovery that
17 would allow it to recover on a reconcilable basis all its existing PENNVEST loan payments and
18 interest. If approved, both provide Pittsburgh Water with flexibility and more certain revenue
19 recovery – including its ability to service debt.

20 **Q. Pittsburgh Water has proposed a mini-review process and limited the scope of the**
21 **2027 increase, why is this not sufficient protection for consumers?**

22 A. While Pittsburgh Water has chosen to narrow the scope of the increase that it has proposed
23 for 2027 to only fund additional debt service costs and has proposed a mini review proceeding

1 prior to implementing its 2027 rate increase, I do not believe that either of these are sufficient
2 mitigation to overcome my opposition. The truncated review proceeding proposed by Pittsburgh
3 Water to allow the Commission a period of “60 days upon receipt of the reconciliation to review
4 and ask questions about the proposed debt issuance”⁶⁷ is hardly sufficient. First, it is clear from
5 this proposal that no other party to this case would be involved in the review contemplated by the
6 Pittsburgh Water’s process. Second, while that proposal would allow Commission the opportunity
7 to check Pittsburgh Water’s math, it does not allow for the sort of fulsome review that should be
8 required when a monopoly utility provider like Pittsburgh Water seeks to increase rates by more
9 than \$20 million.

10 **Q. Pittsburgh Water asserts that its proposed multiyear rate requests are just and**
11 **reasonable based on the factors outlined in the Commission’s policy statement related to**
12 **alternative ratemaking mechanisms at 52 Pa. Code § 69.3302. Do you agree?**

13 A. No. Pittsburgh Water witness Barca sponsored Joint Exhibit EB-10, which he purports
14 demonstrates that the multiyear rate request meets each of the factors outlined in Section 69.3302.
15 I have reviewed that document and his responses. While I will not provide response to all the
16 assertions that Mr. Barca makes in Exhibit EB-10, there are a few areas I wish to address.

17 First, Section 69.3202(7) requires the utility to explain how “the ratemaking mechanism
18 and rate design impact low-income customers and support customer assistance programs.”⁶⁸ In
19 response, Mr. Barca states simply that “Pittsburgh Water’s Multi-year rate plan proposal will have
20 no impact on its existing low-income customer assistance programs.”⁶⁹ This does not answer the
21 question. To be sure, Pittsburgh Water has followed through on its settlement commitment from

⁶⁷ Pittsburgh Water St. 2 at 58:19-20.

⁶⁸ 52 Pa Code § 69.3302(7).

⁶⁹ Pittsburgh Water St. 2, Exhibit EB-10.

1 the last rate case to make improvements to its BDP upon removal of the minimum allowance, but
2 that removal does not necessarily have to be made as a part of the second year of a multi-year rate
3 increase. In fact, it is my position that those changes need to be made with the effective date of
4 rates, *not in 2027*. Thus, these changes have nothing to do with the MYRP but result from
5 previously negotiated settlement agreements. Furthermore, even with these changes, customers’
6 bills are expected to increase significantly from 2025 to 2026 and then again from 2026 to 2027.
7 The BDP changes themselves do not mitigate the entirety of these increases, which will be felt by
8 participants and other ratepayers who support the program through rates. Finally, most of
9 Pittsburgh Water’s low income customers are not currently enrolled in BDP and thus receive no
10 protection or mitigation from these increases. As outlined more fully in other parts of my
11 testimony, there are more than 26,800 households estimated to be BDP-eligible within Pittsburgh
12 Water’s service territory and more than 70% of those households are not enrolled in BDP.⁷⁰ These
13 households who are low income, but not enrolled in BDP, certainly will be impacted by the
14 projected \$20 million year two rate increase.

15 Second, Mr. Barca asserts that the multiyear rate increase promotes rate *stability* for
16 customers because it will “provide rate *certainty* for customers which in turn permits them to
17 plan and facilitates investment in water efficiency measures.”⁷¹ It is difficult to see how this is
18 correct, as it conflates the concepts of stability and certainty. Surely having *no* increase in 2027
19 would be better for rate stability for customers than \$20 million increase without full scrutiny or
20 review. While it is possible that, in the absence of the Commission granting Pittsburgh Water’s

⁷⁰ See Pittsburgh Water Exhibit JAM-12 at 39. This is the most recently available data from Pittsburgh Water’s affordability study. According to that study, there were only 4,648 households enrolled in BDP as of 2023. As of September 2024, there were 7,695 households enrolled in BDP which translates into 28.6% of estimated BDP-eligible households enrolled in BDP. Pittsburgh Water Exh. JAM-12 at 26.

⁷¹ Pittsburgh Water St. 2, Exhibit EB-10.

1 request, Pittsburgh Water could come in for traditional base rate case, this is far from certain and,
2 even if this were the case, the customer would receive notice and could plan for a rate increase in
3 the same way that they could plan for the second year of the increase. In reality, however, as
4 evidenced in my discussion of the economic vulnerabilities of low income, these households have
5 no economic margin each month so there is really very little planning that they could do that would
6 materially improve their chances of affording service without substantial assistance.

7 Finally, Mr. Barca asserts in response to Policy Statement factor 10 that a “second major
8 benefit of a multi-year rate plan is that it will dramatically reduce the frequency of rate case filing
9 and regulatory lag.”⁷² There is simply no evidence that Pittsburgh Water will have “dramatically
10 reduce[d]” rate case filings. Pittsburgh Water did not propose a multi-year stay out in exchange
11 for this multi-year rate case request and made no effort to quantify how less frequent its rate case
12 filings would be if this request were granted. Absent specifics, the Commission should not rely on
13 vague promises and precatory statements as fact.

14 **Q: What is your overall conclusion about whether the multi-year rate plan should be**
15 **approved?**

16 A: Consistent with my testimony herein, it should not be approved.

17 **c. Pittsburgh Water’s Household Affordability Analysis**

18 **Q: Has Pittsburgh Water evaluated affordability of its water, wastewater, and**
19 **stormwater services for its customers?**

20 A: To a limited degree, yes. Pittsburgh Water recently updated its Household Affordability
21 Analysis, as provided in Pittsburgh Water Exhibit JAM-12 (2024 Household Affordability
22 Analysis), appended to the direct testimony of Pittsburgh Water witness Julie Mechling. As

⁷² Pittsburgh Water St. 2, Exhibit EB-10.

1 discussed in Ms. Mechling’s direct testimony, a draft of this Analysis was shared with the LIAAC
2 on February 8, 2025. As a result of feedback from the Pennsylvania Utility Law Project (PULP)⁷³,
3 which is a member of the LIAAC, limited revisions were made to the Analysis, which I will discuss
4 below.

5 My review of Pittsburgh Water’s 2024 Household Affordability Analysis reveals that this
6 Analysis provides only a limited view of affordability at a high level and fails to appropriately
7 consider Pittsburgh Water’s low income customers who face the deepest challenges affording
8 services. Notwithstanding what I consider to be flaws of the 2024 Household Affordability
9 Analysis, appended data in the Analysis shows that low income consumers in Pittsburgh Water’s
10 service territory – especially those consumers with the lowest household income and highest usage
11 levels – face significant levels of unaffordability – even at existing rates.

12 **Q: Please briefly summarize the findings of Pittsburgh Water’s 2024 Household**
13 **Affordability Analysis.**

14 A: Pittsburgh Water’s 2024 Household Affordability Analysis examines the annual water,
15 wastewater, stormwater, and ALCOSAN charges for low, median, and high consumption
16 customers *at current rates*.⁷⁴ The Analysis defines median residential consumption as 3,000
17 gallons/ month; low consumption as 1,000 gallons/ month; and high consumption as 5,000 gallons/
18 month.⁷⁵ The Analysis calculates that a “low consumption” bill is \$847 per year; a median

⁷³ I was not employed by the Pennsylvania Utility Law Project at the time this analysis was shared and had no role in providing feedback on this analysis.

⁷⁴ Pittsburgh Water Exhibit JAM-12 at 17-18.

⁷⁵ *Id.* at 18.

1 consumption bill is \$1,696 per year; and a high consumption bill is \$2,544 per year.⁷⁶ These
2 amounts are inclusive of charges assessed by ALCOSAN.

3 In assessing water, wastewater, and stormwater burdens, the Analysis applies the EPA
4 affordability metric of 4.5%, as well as the AWWA affordability metric. Specifically, the Analysis
5 applies EPA’s 4.5% burden level to (1) median household income (MHI) of \$66,298 and (2) the
6 upper limit of the lowest quantile household income of Pittsburgh Water’s service area (or the 20th
7 percentile income) of \$26,828 – which Pittsburgh Water claims is representative of low income
8 customers.⁷⁷ In addition, the Analysis examines households at 200% of the Federal Poverty Level
9 (FPL) – \$62,400/ year for a household of four.⁷⁸ The Analysis finds that the average percentage of
10 population in Pittsburgh Water’s service area living at 200% FPL or below is 35.3%.⁷⁹

11 Based on a determination of MHI and median consumption of 3,000 gallons/ month, the
12 Analysis finds that the “typical” customers pays 2.6% of their annual income to water, wastewater
13 conveyance and treatment, and stormwater services.⁸⁰ However, the Analysis acknowledges that
14 customers with high consumption (defined as 5,000 gallons/ month) and low income (defined to
15 be \$26,828 per year) pay 9.6% of their income towards water, wastewater conveyance and
16 treatment, and stormwater service.⁸¹ Similarly, the Analysis acknowledges that consumption and
17 income levels have a large effect on customer affordability.⁸² By way of example, the Analysis
18 finds that a customer with median consumption (3,000 gallons/ month) and \$10,000 in income
19 would pay 17.0% of their household income without assistance of the BDP, and 9.1% with BDP

⁷⁶ *Id.* at 18.

⁷⁷ *Id.* at 13.

⁷⁸ Pittsburgh Water Exhibit JAM-12 at 15.

⁷⁹ *Id.*

⁸⁰ Pittsburgh Water Exhibit JAM-12 at 20.

⁸¹ *Id.*

⁸² Pittsburgh Water Exhibit JAM-12 at 21.

1 assistance – both well above the 4.5% affordability standard relied on in the Analysis.⁸³ The
2 Analysis acknowledges a sizable number of eligible customers have not been able to successfully
3 enroll in the BDP – specifically that, while Pittsburgh Water has enrolled approximately 4,645
4 customers in its BDP, it estimates approximately 26,834 residential customers are eligible for the
5 BDP.⁸⁴

6 Importantly, the Analysis acknowledges that its findings are limited because (1) rates may
7 change; and (2) it is not meant to be a true representation of all financial challenges faced by
8 Pittsburgh Water customers – only an overview of affordability challenges of median household
9 income and those living at the upper level of the lowest quantile of income calculated by the
10 Analysis.⁸⁵

11 **Q: Do you have any concerns with Analysis’s reliance on the 1997 U.S. EPA standard for**
12 **assessing water/ wastewater affordability?**

13 A: Yes. As witness for Pittsburgh United, Olivia Wein, discussed extensively in her direct
14 testimony submitted in the 2020 Pittsburgh Water rate proceeding, the U.S. “EPA analyses were
15 derived to assess the financial capability of a water system to comply with water quality standards.
16 The analyses gauge the financial capability of the entire community to “afford” complying with
17 the federal water quality standard at issue and are not designed to assess individual residential
18 household water affordability.”⁸⁶ Furthermore, this standard was developed to screen for system-
19 wide affordability in the context of assessing whether a small water system (communities under

⁸³ Id. at 33.

⁸⁴ Id. at 39.

⁸⁵ Id. at 12.

⁸⁶ Pa. PUC v. PWSA, Pittsburgh United St. 1 at 24, Docket No. R-2020-3017951, et al (Direct Testimony dated July 21, 2020, submitted to Pa. PUC on Sept. 23, 2020) (hereinafter, 2020 PWSA Rate Proceeding).

1 10,000) is required to comply with safe drinking water contaminant standards.⁸⁷ This standard is
2 not applicable to the affordability of Pittsburgh Water rates.

3 While there is no statutory or regulatory standard for water and wastewater affordability in
4 Pennsylvania, the current consensus amongst many experts is that – to be considered affordable –
5 the combined cost for water and wastewater service should not exceed 2.5-4% of household
6 income.⁸⁸

7 **Q: Do you have any concerns about the Analysis’s use of Median Household Income**
8 **(MHI) and lowest quantile income (LQI) when analyzing water, wastewater, and stormwater**
9 **burdens of Pittsburgh Water rates?**

10 A: Yes, I have serious concerns about the Analysis’s reliance on MHI and LQI to assess the
11 affordability of Pittsburgh Water rates for its customers. As discussed, the Analysis acknowledges
12 that its findings are not meant to be a true representation of all financial challenges faced by
13 Pittsburgh Water customers – only an overview of affordability challenges of median household
14 income and those living at the upper level of the lowest quantile of income calculated by the
15 Analysis.⁸⁹ As Pittsburgh Water acknowledges, MHI is not representative of low income
16 households.⁹⁰ By its nature, reliance on MHI means that half of households will have incomes
17 below this median. The MHI utilized in the Analysis is \$66,298. This is \$51,218 above the annual

⁸⁷ 2020 PWSA Rate Proceeding, Pittsburgh United St. 1 at 24-25.

⁸⁸ See, e.g., NRDC, NCLC, Water Affordability Advocacy Toolkit, Affordability and Assistance Programs, available at: <https://www.nrdc.org/sites/default/files/water-affordability-toolkit-section-8.pdf>. (last visited August 29, 2025); NAACP Legal Defense and Educational Fund, Inc., [Water/Color: A Study of Race & The Water Affordability Crisis in America’s Cities](https://www.naacpldf.org/wp-content/uploads/Water_Report_FULL_5_31_19_FINAL_OPT.pdf) (2019), available at: https://www.naacpldf.org/wp-content/uploads/Water_Report_FULL_5_31_19_FINAL_OPT.pdf (last visited August 29, 2025); Roger Colton, [The Affordability of Water and Wastewater Service in Twelve US Cities](https://www.theguardian.com/environment/2020/jun/23/full-report-read-in-depth-water-poverty-investigation), *The Guardian* (May 2020), available at: <https://www.theguardian.com/environment/2020/jun/23/full-report-read-in-depth-water-poverty-investigation>. (last visited August 29, 2025)

⁸⁹ Pittsburgh Water Exhibit JAM-12 at 12.

⁹⁰ *Id.* at 12, 13-14.

1 income of a full-time minimum wage worker in Pennsylvania, and \$26,323 above the annual
2 income of a family four at 150% FPL (defined as \$39,975 per the 2025 FPL Guidelines).

3 Further, Pittsburgh Water’s reliance on the upper limit of LQI as a representation of low
4 income customers is flawed in several ways. First, calculation of LQI does not reveal the FPL of
5 households in the Analysis and is unmoored from the consideration of the impact of household
6 size on unaffordability. While energy usage is largely dependent on the square footage of a home,
7 water and wastewater usage is largely dependent on the number of individuals in a household. The
8 Analysis utilizes \$26,828 as the upper limit of the lowest quantile. However, \$26,828 annually
9 represents a fundamentally different level of affordability depending on household size, with a
10 household size of one at that income level having an FPL of 171% and a household size of four at
11 the same income level having an FPL of just 83%. Since water usage is largely dependent on
12 individual consumption, households with 4 people are likely to use far more water than households
13 with only 1 person.

14 Second, the Analysis fails to capture households with income *below* the upper limit of the
15 lowest quantile, or account for the fact that these households will likely have burden levels greater
16 than those of households at this upper limit. For context, at 40 hours a week, not accounting for
17 any sick time or holidays, a full-time worker making \$10/ hour could make a maximum total gross
18 income of \$20,800. The Analysis use of \$26,828, as the upper limit of the lowest quantile is \$6,028
19 above this amount. Reliance on this upper quantile masks unaffordability for many low income
20 customers with income below this upper quantile, or who may be experiencing increased
21 unaffordability due to several other factors – including differences in household composition.

1 **Q: Do you have any concerns about the analyses set forth in Appendix B to the Analysis?**

2 A: I have concerns about Pittsburgh Water’s interpretation of data contained in Appendix B.
3 As discussed, the data set forth in Appendix B of the Analysis was developed in response to
4 feedback provided by PULP and aimed towards expanding the Analysis’s examination of
5 affordability of Pittsburgh Water rates for its low income customers. Specifically, expanded data
6 in Appendix B examined burden levels for customers with FPL levels between 50-250% FPL, for
7 households with 1-5 members, with usage levels between 1,000-8,000 gallons/month.⁹¹ In
8 addition, Appendix B provided burden levels at the same FPLs, household sizes, and usage levels
9 for applying the discounts currently provided by the BDP.⁹²

10 I am concerned that, rather than incorporate this critical information directly into the
11 Analysis, Pittsburgh Water has chosen to relegate information essential to determining
12 affordability of rates for its low income customers to a separate Appendix, and to minimize the
13 importance of this data.

14 The Analysis claims that the tables included in Appendix B “begin to parse the information
15 in ways that are subject to misinterpretation” and that “juxtapose utility bill information with
16 publicly available data in granular ways that may reflect small sample sizes and outliers”.⁹³ I
17 disagree. By their own estimates, 26,834 Pittsburgh Water customers are low income (defined by
18 Pittsburgh Water as at or below 200% FPL). These are significant numbers of customers and
19 cannot be classified as either “small samples” or “outliers”. In addition, the usage amongst
20 Pittsburgh Water residential customers – including its low income customers – ranges well past

⁹¹ Pittsburgh Water Exhibit JAM-12 at 57-62.

⁹² Id.

⁹³ Pittsburgh Water Exhibit JAM-12 at 56.

1 the 3,000 gallons/ month utilized throughout the Updated Household Affordability Analysis. As
2 shown in Table 5 above, in 2025, approximately 42% of BDP customers reported usage above
3 3,000 gallons/month, with 11% of BDP customers reporting usage above 6,000 gallons/ month.
4 Arguments that higher usage levels should be excluded because they represent outliers in customer
5 data ignore the significant percentage of customers who have usage higher than the levels relied
6 on in the Updated Household Affordability Analysis.

7 In addition to these fundamental issues in how Pittsburgh Water has prefaced the data
8 contained in Appendix B, I am concerned that Pittsburgh Water attempts to minimize the
9 unaffordability of its rates for many of its low income customers by claiming that the data in
10 Appendix B fails to give a full sense of Pittsburgh Water’s performance – and that any essential
11 services can be viewed as unaffordable to some isolated customers.⁹⁴ Pittsburgh Water has
12 significant numbers of low income customers who, as Appendix B shows, are facing profound
13 burden levels each month. The data in Appendix B shows that – for many low income customers
14 – Pittsburgh Water rates are categorically unaffordable, even at lower usage levels. For example,
15 a one-person household at or below 150% will have burden levels exceeding a 4% affordability
16 standard, regardless of whether they consume 2,000 or 8,000 gallons/ month. As another example,
17 for customers with household incomes at or below 150% FPL and a 3-person household size, only
18 those customers at the top of this range (150%) and who have the lowest usage levels (2,000
19 gallons/month) will have burden levels at or below 4%. While enrollment in the BDP reduces these
20 burden levels, it appears that customers with higher usage levels and/or larger household sizes will
21 continue to receive unaffordable monthly bills. Again, the burden levels set forth throughout the
22 Analysis, including in Appendix B, are based on current rates, and do not account for the increased

⁹⁴ Id.

1 unaffordability if Pittsburgh Water is permitted to increase its rates in the context of the present
2 proceeding. This is a tremendous flaw in PWSA’s Analysis.

3 The challenges associated with water insecurity are neither hypothetical nor isolated, and
4 effect thousands of households in Pittsburgh Water’s service territory. Each month, low income
5 households must make the untenable decision between affording life-sustaining water services and
6 other necessities – such as food, medicine, and housing. The struggles of these low income
7 customers to access and afford services must be taken into consideration in a meaningful manner.

8 **Q: What is your conclusion regarding Pittsburgh Water’s 2024 Household Affordability**
9 **Analysis?**

10 A: The 2024 Household Affordability Analysis provides limited insight into low income
11 consumers in Pittsburgh Water’s service territory. The Analysis itself points out that it is not meant
12 to be a true representation of the financial challenges faced by Pittsburgh Water customers.⁹⁵ More
13 meaningful analysis illustrating the burden of Pittsburgh Water’s existing rates on low income
14 customers is relegated to Appendix B and prefaced by perspectives which seek to marginalize
15 broader consideration of the affordability of rates for low income customers. While the Analysis
16 may be, as it claims, a perspective on “enterprise fund utility performance overall”⁹⁶ it cannot and
17 should not be used as a guide for the affordability of Pittsburgh Water rates for its customers.

⁹⁵ Pittsburgh Water Exhibit JAM-12 at 12.

⁹⁶ Id. at 56.

1 **V. Low Income Assistance Programs**

2 **a. General Low Income Assistance Program Recommendations**

3 **Q: Do you have any overarching concerns about Pittsburgh Water’s low income**
4 **assistance programs which you would like to address in the context of this direct testimony?**

5 A: Yes. First, I am concerned that Pittsburgh Water’s low income assistance programs are
6 undersubscribed and reach just a fraction of its low income customers. Second, I am concerned
7 that the BDP is not appropriately structured to reach affordability for those at lower ends of the
8 eligibility threshold – particularly households up to 100% FPL. Third, I am concerned that the
9 BDP and AFP are not structured properly to work together to ensure that households receive not
10 only a discounted bill but forgiveness of arrears.

11 **Q: Please elaborate on your concerns about BDP and AFP enrollment.**

12 A: Pursuant to the Joint Petition for Settlement approved by the Commission in Pittsburgh
13 Water’s 2023 rate proceeding, Pittsburgh Water agreed to: (1) implement call scripting and
14 checklists for its CSRs to assist screen customers for eligibility in Pittsburgh Water’s low income
15 assistance programs; and (2) begin screening all new and moving customers for income level and
16 eligibility for assistance at the time their service is established, and provide warm referrals to such
17 customers.⁹⁷ In addition to these processes,⁹⁸ Pittsburgh Water appears to provide its customers
18 with information related to its low income assistance programs in a variety of situations, including
19 where there is no past balance due or if customers are having affordability challenges including
20 past due balances or termination notices.⁹⁹

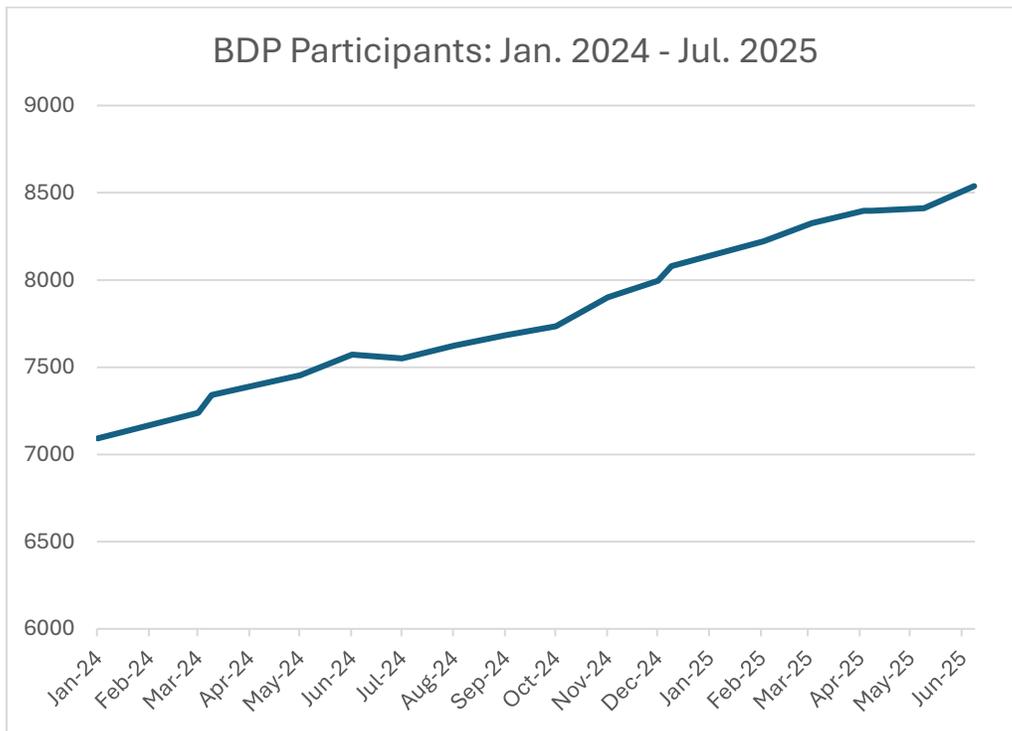
⁹⁷ Pa. PUC v. PWSA, Joint Pet. for Settlement at Para. D.2, Order approving Joint Petition, with modification Docket No. R-2023-3039919, et al (Order entered Jan. 18, 2024)

⁹⁸ Pittsburgh Water response to OWT 2-16, Attachment, E, attached hereto at Appendix B.

⁹⁹ Id.

1 It also appears that Pittsburgh Water has implemented certain enrollment goals related to
2 its BDP. In response to discovery, Pittsburgh Water indicates that its Cares Team set a total BDP
3 enrollment goal of 8,000 by the end of 2024, and 9,000 by the end of 2025.¹⁰⁰

4 It appears that Pittsburgh Water’s BDP enrollment has steadily progressed between January
5 2024 and July 2025:¹⁰¹



6
7 While BDP enrollment has steadily increased since the beginning of 2024, that there
8 continues to be a substantial gap in the number of customers which Pittsburgh Water estimates are
9 eligible for the BDP and those enrolled in the BDP. As of July 2025, Pittsburgh Water reports

¹⁰⁰ Pittsburgh Water response to OWT 4-31, attached hereto at Appendix B.

¹⁰¹ Pittsburgh Water response to OWT 4-31.A., Attachment, attached hereto at Appendix B.

1 8,538 customers enrolled in the BDP.¹⁰² By comparison, Pittsburgh Water estimates that 26,834
 2 customers in Pittsburgh Water’s service territory are BDP eligible.¹⁰³

3 Pittsburgh Water’s Arrearage Forgiveness Program (AFP) is likewise undersubscribed.
 4 Currently, there is a sizable gap between the number of customers enrolled in the AFP, and those
 5 enrolled in the BDP:

6 **Table 13: AFP v. BDP Participants** ¹⁰⁴

	AFP Participants	BDP Participants
Dec. 2023	1,003	6,961
Dec. 2024	735	7,995
Jul. 2025 (last available date)	844	8,538

7 Based on the data provided by Pittsburgh Water, there are a significant number of BDP
 8 participants who carry substantial pre-program arrears yet are not enrolled in AFP. As of the most
 9 recent date available, 976 BDP accounts carried balances eligible for AFP forgiveness but were
 10 not enrolled in the AFP.¹⁰⁵ The following Table shows the number of BDP customers entering the
 11 program with unpaid arrearages, as well as the median and mean amounts of these arrearages at
 12 the time of enrollment:

¹⁰² Pittsburgh Water response to OWT 4-31.A., Attachment, attached hereto at Appendix B.

¹⁰³ Pittsburgh Water Exhibit JAM-12 at 39.

¹⁰⁴ Pittsburgh Water response to OCA 4-3, “BDP”, “Arrearage Forgiveness”, attached hereto at Appendix B.

¹⁰⁵ Pittsburgh Water response to I&E RE-29, “Summary”, attached hereto at Appendix B.

1 **Table 14: BDP Enrollees w/ Arrearages; Mean/ Median Arrears at Enrollment¹⁰⁶**

	BDP Enrollees w/ Arrearages	Mean	Median
Dec. 2022	52	\$1,437.58	\$954.93
Dec. 2023	122	\$1,071.34	\$472.65
Dec. 2024	135	\$1,457.24	\$775.38
Jun. 2025	129	\$1,436.68	\$504.31

2 As discussed in detail below, there is also substantial undersubscription to Pittsburgh
 3 Water’s other low income assistance programs, including its Hardship Fund and Line Repair and
 4 Water Conversation Program. Enrollment in these programs is essential to mitigating
 5 unaffordability at present rates and is even more critical if Pittsburgh Water is ultimately permitted
 6 to further increase its rates of basic service within the context of this proceeding. Pittsburgh Water
 7 and its PGH2O Cares Team must expand systematic efforts so that more low income customers
 8 can learn about and ultimately enroll in available assistance programs.

9 **Q: Do you have any overall recommendations to improve the enrollment and uptake of**
 10 **Pittsburgh Water’s low income assistance programs?**

11 A: Yes, while I will discuss the accessibility of Pittsburgh Water’s low income assistance
 12 programs (including its BDP) in detail below, I recommend that Pittsburgh Water implement
 13 additional overarching metrics to increase enrollment in its low income assistance programs.

14 Pittsburgh Water indicates that it has implemented enrollment goals for its BDP for 2024
 15 and 2025. I recommend that Pittsburgh Water be required to implement annual enrollment metrics
 16 and goals on an ongoing basis which extend past 2025. I recommend that Pittsburgh Water target

¹⁰⁶ Pittsburgh Water response to OWT 1-10, Attachments A-D, attached hereto at Appendix B. Please note that Pittsburgh Water incorrectly labeled Attachment B to Pittsburgh Water response to OWT 1-10 as OCA 1-10, Attachment B.

1 an annual year over year increase of 10% in its BDP enrollment. I also recommend that Pittsburgh
2 Water work with its Low Income Assistance Advisory Committee (LIAAC) to determine
3 additional enrollment goals and metrics, including for its Line Repair and Conversation Program.
4 I recommend that these goals/ metrics are implemented within 6 months of effective date of rates
5 in this proceeding. I also recommend that Pittsburgh Water be required to report on any
6 implemented goals/ metrics on a quarterly basis to its LIAAC.

7 **b. Bill Discount Program**

8 **Q: Please describe the current benefits provided under Pittsburgh Water’s BDP.**

9 A: Currently, BDP customers receive a 100% discount on their water and wastewater fixed
10 monthly service charges. BDP customers who are at or below 50% FPL also receive a 60%
11 discount on their water and wastewater volumetric charges.¹⁰⁷ In addition, BDP participants
12 receive an 85% discount on their stormwater fee, and a 50% discount on PENNVEST charges.¹⁰⁸

13 **Q: Is Pittsburgh Water proposing any changes to its BDP in the context of this**
14 **proceeding?**

15 A: Yes. Pittsburgh Water proposes implementing three changes to its BDP in the context of
16 the present proceeding.

17 First, Pittsburgh Water proposes extending BDP recertification requirements from two to
18 five years for customers on fixed income from social security and/or retirement benefits.¹⁰⁹

¹⁰⁷ Pittsburgh Water, Tariff Water, Supplement No. 14 - Pa. P.U.C. No. 1 Third Page No. 19; Pittsburgh Water, Tariff Wastewater, Supplement No. 13 - Pa. P.U.C. No. 1, Third Page No. 17; Pittsburgh Water, Tariff Stormwater, Supplement No. 5, Pa. P.U.C. No. 1 First Page No. 17.

¹⁰⁸ Id.

¹⁰⁹ Pittsburgh Water St. 6 at 32.

1 Second, Pittsburgh Water propose to automatically enroll customers into the BDP who
 2 apply for and are granted a Hardship Fund grant through a community-based organization
 3 partnering with Dollar Energy Fund (DEF).¹¹⁰

4 Third, Pittsburgh Water proposes to revise the structure of the BDP and alleges that these
 5 revisions will account for its proposed elimination of the minimum usage charge. Pursuant to a
 6 Settlement approved by the Pennsylvania Public Utility Commission (Commission or PUC) its
 7 last base rate proceeding, Pittsburgh Water agreed to propose a BDP structure – to be implemented
 8 with the removal of the minimum usage charge – which would ensure that enrolled customers
 9 receive *at least the same discount* on a total bill as they receive with the current rate structure.¹¹¹
 10 Under its proposed revised structure, Pittsburgh Water would maintain the current percent
 11 discounts for water, wastewater, and stormwater BDP customers. In addition to these percentage
 12 discounts, Pittsburgh Water proposes providing customers with bill credits as follows:

13 **Table 15: Pittsburgh Water’s Proposed Changes to BDP¹¹²**

	2026	2027
CAP Customers between 51% - 200% of FPL	\$5.00 per bill for water charges	\$23.00 per bill for water charges
	\$2.50 per bill for wastewater conveyance charges	\$9.00 per bill for wastewater conveyance charges
CAP Customers at or below 50% of FPL	\$0.00 per bill for water charges	\$8.35 per bill for water charges
	\$0.00 per bill for wastewater conveyance charges	\$2.98 per bill for wastewater conveyance charges

14 Pittsburgh Water’s witness, Julie Mechling, indicates that the bill credits provided in 2026
 15 are intended to smooth the transition to the proposed 2027 rate structure.¹¹³ Pittsburgh Water also

¹¹⁰ *Id.* at 32-33.

¹¹¹ *Pa. Pub. Util. Comm’n v. Pittsburgh Water and Sewer Auth., Order*, Docket Nos. R-2023-3039920 (water); R-2023-3039921 (Wastewater); R-2023-3039919 (Stormwater) (Order approving Recommended Decision entered Jan. 18, 2024); See also, Recommended Decision dated Nov. 28, 2023, “Terms and Conditions of Settlement”, Section 9.E.3.d at p. 33.

¹¹² Pittsburgh Water St. 6 at 26.

¹¹³ *Id.* at 26-27.

1 proposes to continue its current tariff requirement that BDP customers receive a 50% discount on
2 the water and sewer PENNVEST Charge.¹¹⁴

3 **Q: Do you support Pittsburgh Water’s proposal to extend BDP recertification**
4 **requirements from two to five years for customers with social security income and/or**
5 **retirement benefits?**¹¹⁵

6 A: Yes. Low income customers often struggle to gather and submit documentation, and often
7 lack access to internet, printers, fax machines, and other communication tools necessary to meet
8 documentation requirements for recertification. Extending recertification requirements for
9 customers with fixed income will help reduce unnecessary and burdensome paperwork
10 requirements for low income households and help customers to better maintain BDP enrolment,
11 which is necessary to reduce unaffordability at full tariff rates. It will also cut down on unnecessary
12 administrative costs to perform more frequent recertification of households whose income does
13 not materially change.

14 **Q: Do you support Pittsburgh Water’s proposal to automatically enroll customers into**
15 **the BDP who apply for and are granted a Hardship Fund grant through a Community-Based**
16 **Organization partnering with DEF?**¹¹⁶

17 A: Yes. Eligibility for the Hardship Fund and BDP are both set at 200% FPL. Customers who
18 have successfully applied for the Hardship Fund should not have to provide duplicative
19 information to enroll in the BDP. Streamlining BDP enrollment for these customers will help to

¹¹⁴ *Id.* at 27, FN 5. “The Commission approved Pittsburgh Water’s proposed 50% discount for the PVC for BDP participants as part of the last base rate case and the provision is already included in Pittsburgh Water’s tariff. Until this proceeding, Pittsburgh Water had not begun assessing any costs to customer pursuant to the PVC.”

¹¹⁵ *Id.* at 32.

¹¹⁶ Pittsburgh Water St. 6 at 32-33.

1 enroll more eligible customers and better address the underlying affordability challenges which
 2 lead to payment troubles.

3 **Q: Do you support Pittsburgh Water’s proposed changes to the structure and discount**
 4 **levels of its BDP?**

5 A: I support changes to the BDP structure that improve affordability, but the changes proposed
 6 by Pittsburgh Water are insufficient and fail to provide consistently affordable rates, particularly
 7 those participants with lower incomes and higher usage levels.

8 **Q: Please explain.**

9 A: Households using 3,000 gallons/ month (the median consumption used by Pittsburgh Water
 10 in its Household Affordability Analysis),¹¹⁷ with 3 household members will have a similar burden
 11 level under Pittsburgh Water’s 2027 proposal to burden levels at current rates (assuming a Tier 2
 12 stormwater fee), as shown by the following table:

13 **Table 16: Current v. Proposed 2027 –BDP Customer; 3-Person Household; 3,000**
 14 **gallons/month; Tier 2 Stormwater Fee¹¹⁸**

FPL	Current			Pittsburgh Water Proposed (2027)		
	Monthly BDP	Annual BDP	BDP Burden	Monthly BDP	Annual BDP	BDP Burden
50%	\$ 65.06	\$ 780.72	6%	\$ 74.12	\$ 889.44	7%
100%	\$ 94.12	\$ 1,129.44	4%	\$ 104.86	\$ 1,258.32	5%
150%	\$ 94.12	\$ 1,129.44	3%	\$ 104.86	\$ 1,258.32	3%
200%	\$ 94.12	\$ 1,129.44	2%	\$ 104.86	\$ 1,258.32	2%

15 By comparison if this same household used 6,000 gallons/month, households with income
 16 under 100% FPL would see notable increases to their burden levels under Pittsburgh Water’s
 17 proposal:

¹¹⁷ Pittsburgh Water Exhibit JAM-12 at 54.

¹¹⁸ OWT Exhibit 1-a; Exhibit 1-c.

1 **Table 17: Current v. Proposed 2027 – BDP Customer; 3-Person Household; 6,000**
 2 **gallons/month; Tier 2 Stormwater Fee**¹¹⁹
 3

	Current			Pittsburgh Water Proposed (2027)		
FPL	Monthly BDP	Annual BDP	BDP Burden	Monthly BDP	Annual BDP	BDP Burden
50%	\$ 129.88	\$ 1,558.56	12%	\$ 150.05	\$ 1,801.60	14%
100%	\$ 202.52	\$ 2,430.24	9%	\$ 233.75	\$ 2,805.00	11%
150%	\$ 202.52	\$ 2,430.24	6%	\$ 233.75	\$ 2,805.00	7%
200%	\$ 202.52	\$ 2,430.24	5%	\$ 233.75	\$ 2,805.00	5%

4 As the above tables above, Pittsburgh Water’s proposed changes to its BDP fail to maintain
 5 current burden levels for BDP customers who have higher usage levels. Counsel will address the
 6 legal impact of this failure, including whether the failure to maintain current burden levels is
 7 consistent with the settlement agreement in the last rate case. These unaffordable burden levels are
 8 particularly pronounced for customers with lower FPLs. For example, a 3-person household at
 9 100% FPL using 6,000 gallons/ month, who is enrolled in the BDP (again assuming a Tier 2
 10 stormwater fee) will have a combined burden of 11%.

11 Importantly, Pittsburgh Water’s BDP proposal fails to provide affordable burden levels for
 12 most of its program participants. As noted above, to be affordable, experts generally agree that
 13 combined water/wastewater/stormwater costs should be no more than 4% of household income.
 14 As Table 16 shows, at 2027 proposed rates, a 3-person household using 3,000 gallon/ month with
 15 a Tier 2 stormwater fee, will not be able to achieve affordable burden levels if their household
 16 income is at or below 100% FPL. As Table 17 shows, a 3-person household using 6,000 gallons/

¹¹⁹ OWT Exhibit 1-a and Exhibit 1-c. Note that the Proposed BDP amounts set forth in this Table and Exhibit 1-c are not inclusive of ALCOSAN discounts. If a household also receives a Clean Water Fund discount from ALCOSAN, they will receive an additional \$50 discount quarterly that would be applied to their ALCOSAN charges billed by Pittsburgh Water. This would further reduce their overall bill, but since the provision of this discount is not within the scope of this case, and since very few customers receive this discount, it is not reflected in these burden charts. This is consistent with the discussion by Pittsburgh Water in its Household Affordability Analysis.

1 month with a Tier 2 stormwater fee will not be able to achieve an affordable burden level –
2 regardless of their FPL.

3 It is essential that customers with higher usage levels and/or lower income tiers are taken
4 into consideration when analyzing whether the BDP is providing consistently affordable bills to
5 customers. Data provided by Pittsburgh Water in response to discovery shows that 28% of BDP
6 customers had monthly consumption at or above 4,000 gallons/month with 18% of BDP customers
7 had monthly consumptions at or above 5,000 gallons/ month.¹²⁰

8 **Q: Do you have any recommendations to improve the structure and discount levels of**
9 **Pittsburgh Water’s BDP?**

10 A: Yes. I recommend that Pittsburgh Water be required to implement additional reforms to
11 the structure and discount levels of the BDP to better address customers with higher usage levels
12 and income that places them on a lower FPL tier. Pittsburgh Water continues to kick the can down
13 the road on all these changes by delaying planning and implementation and through the proposal
14 of MYRPs in the last several rate cases. I do not think we should delay. Since I do not support the
15 MYRP, I recommend that Pittsburgh Water be required, with the effective date of rates, to remove
16 its minimum usage amount from rates *and* implement the changes that it has proposed to the BDP,
17 as well as those that I have proposed, with the effective date of rates in this proceeding.

18 I also have several improvements to the BDP that seek to better address the immediate
19 increases to unaffordability that low income customers will experience in 2026 if Pittsburgh Water
20 is permitted to increase its base rates, I recommend that discounts Pittsburgh Water proposes for

¹²⁰ Pittsburgh Water response to OWT 3-42, Attachment, attached hereto at Appendix B.

1 its BDP for 2027 go into full effect as of the date of effective rates in this proceeding. I further
2 recommend the following changes:

3 First, Pittsburgh Water should provide the same percentage discount levels on volumetric
4 usage to customers between 51-100% FPL as it proposes to provide to BDP participants between
5 0-50% FPL. Thus, all BDP customers between 0-100% FPL would receive 100% discount on their
6 water and wastewater service charges, and a 60% discount on their water and wastewater
7 volumetric charges – in addition to the 85% discount on their stormwater fee, the 50% discount on
8 PENNVEST charges, and the bill credits outlined above. Extending the volumetric discount to
9 BDP customers between 0-100% FPL will help to address the need for increased affordability for
10 customers who have lower FPL levels, and those with higher usage levels that I have outlined
11 above.

12 Second, I recommend that Pittsburgh Water change the bill fixed bill credit structure for
13 households with income between 0-50% FPL and for households between 51-100% FPL. For
14 water service, households at 0-50% FPL, the bill credit should be \$16.70 per month in addition to
15 the discounts noted above and a fixed discount of \$5.96 for wastewater service. Households at 51-
16 100% the fixed bill credit should be \$8.35 per month for water service and \$2.98 for wastewater
17 service, in addition to the volumetric discount that should be implemented for this group of
18 customers. The bill credit for households from 101-200% should remain at the proposed \$23 per
19 month for water and \$9 per month for wastewater because these customers do not receive any
20 volumetric discounts.

21 Here is a summary chart of the changes I have proposed as compared to those proposed by
22 Pittsburgh Water:

1

Table 18: Pittsburgh Water 2027 BDP proposal v. OWT BDP Proposal

	Pittsburgh Water 2027 BDP Proposal	OWT BDP Proposal
Percentage Bill Discounts	<ul style="list-style-type: none"> • 0-50% FPL: <ul style="list-style-type: none"> ○ 100% discount, w/ww service charges ○ 60% discount, w/ww volumetric charges ○ 85% discount, stormwater fee ○ 50% discount, PENNVEST charges • 51-200% FPL: <ul style="list-style-type: none"> ○ 100% discount, w/ww service charge ○ 85% discount, stormwater fee ○ 50% discount, PENNVEST charges 	<ul style="list-style-type: none"> • 0-100% FPL: <ul style="list-style-type: none"> ○ 100% discount, w/ww service charges ○ 60% discount, w/ww volumetric charges ○ 85% discount, stormwater fee ○ 50% discount, PENNVEST charges • 101-200% FPL: <ul style="list-style-type: none"> ○ 100% discount, w/ww service charge ○ 85% discount, stormwater fee ○ 50% discount, PENNVEST charges
Fixed Bill Discounts	<ul style="list-style-type: none"> • 0-50% FPL: <ul style="list-style-type: none"> ○ \$8.35/ bill (w) ○ \$2.98/ bill (ww) • 51-200% FPL: <ul style="list-style-type: none"> ○ \$23/ bill (w) ○ \$9.00/ bill (ww) 	<ul style="list-style-type: none"> • 0-50% FPL: <ul style="list-style-type: none"> ○ \$16.70/ bill (w) ○ \$5.96/ bill (ww) • 51-100% FPL: <ul style="list-style-type: none"> ○ \$8.35/ bill (w) ○ \$2.98/ month (ww) • 101-150% FPL: <ul style="list-style-type: none"> ○ \$23/ month (w) ○ \$9/ month (ww)

2 **Q: What is the impact of these changes on affordability?**

3 A: These changes would materially improve affordability for Pittsburgh Water’s lowest
4 income BDP customers at higher usage levels. For example, and as illustrated in Exhibit 1-d
5 attached to my direct testimony, a family of four at 50% FPL using 6,000 gallons/month will have
6 a combined burden (assuming a Tier 2 stormwater fee) of approximately 9.7% under my proposal
7 – compared to approximately 11.2% under Pittsburgh Water’s 2027 proposed BDP structure. By
8 way of another example, illustrated in OWT Exhibit 1-d, a family of four at 100% FPL using 6,000
9 gallons/month will have a combined burden (assuming a Tier 2 stormwater fee) of 5.6% under my
10 proposal – compared to 8.7% under Pittsburgh Water’s 2027 proposed BDP structure. While there

1 remain households who have bills that do not reach an objective measure of affordability, the
2 structure that I have proposed improves affordability while working within the structure that
3 Pittsburgh Water has chosen. These are meaningful improvements that will help Pittsburgh
4 Water’s BDP customers to better afford their monthly bills.

5 **c. Arrearage Forgiveness Program**

6 **Q: Please briefly describe Pittsburgh Water’s Arrearage Forgiveness Program, as**
7 **currently structured.**

8 A: Pittsburgh Water’s Arrearage Forgiveness Program – or AFP – is available only to BDP
9 customers and provides a \$40 credit towards BDP customers’ arrears for every on-time, in full
10 payment while enrolled in the program.¹²¹ In order to qualify for AFP credits, customers must
11 also be on an active payment arrangement.¹²² They may also separately enroll on AFP from BDP.

12 **Q: Is Pittsburgh Water proposing any changes to its Arrearage Forgiveness Program in**
13 **the present proceeding?**

14 A: Yes. Pursuant to Settlement commitments approved by the Commission in Pittsburgh
15 Water’s last base rate proceeding, Pittsburgh Water was required in this proceeding to propose an
16 AFP that would allow existing and future participants to receive arrearage forgiveness over no
17 longer than 36 months, without requiring participants to make any copayments toward their frozen
18 preprogram arrears.¹²³

¹²¹ Pittsburgh Water Exhibit JAM-4.

¹²² Id.

¹²³ PWSA St. 2 at 67. Pa. PUC v. PWSA, Joint Pet. for Settlement, Paragraph E.3. Docket No. R-2023-3039919, et al, (Order approving Joint Petition for Settlement, with modifications entered Jan. 18, 2024).

1 Pittsburgh Water proposes to amend the structure of its AFP to allow all existing and future
2 participants to receive arrearage forgiveness over a period of 24 months, so long as they stay
3 current on future bills or payment plans.¹²⁴ Failure to stay current would pause forgiveness through
4 the AFP.¹²⁵

5 Pittsburgh Water is requesting cost recovery in the amount of \$280,094 in both the FPFTY
6 and FY 2027, and indicates that cost recovery is to eliminate additional revenue requirements for
7 FY 2027 which are not associated with debt service costs.¹²⁶ Such costs would be recovered via a
8 new Rider AFP as a component of Pittsburgh Water’s rates, but not billed as a separate
9 surcharge.¹²⁷

10 **Q: Do you support Pittsburgh Water’s proposed changes to its AFP?**

11 A: To a certain extent, yes. I am supportive of Pittsburgh Water’s proposal to revise the design
12 and structure of the AFP to allow program participants to receive full forgiveness on their pre-
13 program arrears within 24 months. As of June 2025, Pittsburgh Water reports that BDP customers
14 carried an average arrearage level of approximately \$1,440.¹²⁸ These are significant levels of past
15 due debt and underscore that – even with the assistance of the BDP – low income customers carry
16 sizable debts because of the unaffordability of Pittsburgh Water’s rates.

17 Notwithstanding this support, I have several concerns. First, Pittsburgh Water indicates
18 that AFP participants “are not required to make a payment towards the pre-program, frozen
19 arrears”.¹²⁹ However, I am concerned that Pittsburgh Water’s proposed tariff submitted in its initial

¹²⁴ PWSA St. 2 at 67.

¹²⁵ Id.

¹²⁶ PWSA St. 6 at 36. PWSA St. 2 at 67.

¹²⁷ PWSA St. 6 at 36.

¹²⁸ Pittsburgh Water response to OWT 1-19, Attachment, “BDP”, attached hereto at Appendix B.

¹²⁹ PWSA St. 6 at 35-36.

1 filing continues to require AFP participants to enter into payment arrangements as a requirement
2 of AFP enrollment, thereby imposing a monthly co-payment toward the arrears – instead of
3 allowing the arrears to be frozen at the time the participant enters the program.

4 Pittsburgh Water’s proposed tariff specifically maintains its current language:¹³⁰

5 (a) Customers receiving residential service pursuant to Rider BDP *who maintain an active,*
6 *income based payment plan as documented by the Authority* shall be eligible to participate
7 in the Arrearage Forgiveness Program. Customers who negotiate a payment arrangement
8 for their pre-existing arrearages will be automatically enrolled in the Arrearage Forgiveness
9 Program.

10 ...

11 (c) The Authority will cease assessing any interest on the arrears and pursuing collections
12 while the customer is in an active, income based payment plan.

13 (d) Should the participating customer default on the payment plan, he or she will have the
14 opportunity to make two catch-up payments to continue to receive the benefits of the
15 Arrearage Forgiveness Program. Failure to make the two catch-up payments will result in
16 immediate removal of the customer from the Arrearage Forgiveness Program.

17 These proposed tariff provisions retain current requirements that AFP participants must
18 enter and maintain a payment arrangement to receive the benefits of the program. Counsel for
19 OWT will address the legal question of whether Pittsburgh Water’s AFP proposal meets the
20 requirements agreed to and approved in its last rate proceeding. Setting legal questions aside, I am
21 concerned that Pittsburgh Water’s tariff proposals would continue to subject AFP participants to
22 increased unaffordability due to payment arrangements requirements that undercut the purpose of
23 the AFP, as well as Pittsburgh Water’s other low income assistance programs.

¹³⁰ Pittsburgh Water Exh JAM-15, Supplement No. 16, Tariff Water - Pa. P.U.C. No. 1, Second Page No. 19A, Canceling First Revised Page No. 19A. (emphasis added).

1 As I address further below, it is unclear whether Pittsburgh Water intends to allow AFP
2 participants to earn forgiveness if they catch up on missed payments.¹³¹ Most other arrearage
3 management programs in the Commonwealth provide monthly forgiveness for every in-full
4 payment, rather than also requiring on-time payments, as it serves as an important incentive for
5 participants to catch up when they fall behind.¹³²

6 **Q: What do you recommend?**

7 A: Pittsburgh Water should not require AFP participants to enter into a separate payment
8 agreement. As currently structured, AFP participants must enter a payment arrangement to qualify
9 for arrearage forgiveness. This payment arrangement adds to customers' monthly bill obligations,
10 and further compounds unaffordability of monthly rates for program participants. For AFP
11 participants also enrolled in the BPD, requiring an additional payment arrangement amount above
12 the BDP rate undercuts the purpose of the BDP to provide customers with affordable monthly bills.

13 For existing AFP participants who have a payment arrangement, within 60 days from the
14 effective date of rates, Pittsburgh Water should communicate with the customer that they no longer
15 need to make the additional payment to receive forgiveness and cancel that arrangement. Any
16 customers who are behind on their bills or payment arrangement at the time of this change should
17 have all their arrears swept into AFP and be subject to future forgiveness.

¹³¹ See Pa. PUC v. PWSA, Order, Docket Nos. R-2020-3017951 et al (Order Approving Joint Petition for Settlement entered Dec. 3, 2020). Joint Petition for Settlement, Paragraph F.2.c. provides, in relevant part that “Should the customer default on the payment plan, they will have the opportunity to make two catch-up payments to receive the incremental arrearage forgiveness. Future defaults will result in an immediate removal of the customer from the Pilot Arrearage Forgiveness Program.”). However, there is no indication to what extent catch-up payments will result in arrearage forgiveness credits for these customers. See Pittsburgh Water Exhibit JAM-14, Supplement No. 16, Tariff Water - Pa. P.U.C. No. 1, Second Page No. 19A, Canceling First Revised Page No. 19A,

¹³² 2023 Universal Service Programs & Collections Performance Report at p. 66, available at: https://www.puc.pa.gov/media/3433/2023_universal_service_report-final_rev041525.pdf (“All utilities now apply arrearage forgiveness to any full CAP payments amount covered, regardless of the timeliness of the payment.”) (last visited Sept. 3, 2025)

1 Pittsburgh Water should work with its LIAAC to develop outreach and education for
2 current AFP participants to explain that their arrears will be forgiven with each in-full BDP
3 payment moving forward, and that they do not have to enter a payment arrangement to receive this
4 forgiveness.

5 **Q: Do you have an additional recommendation?**

6 A: Yes, I am also concerned that Pittsburgh Water’s tariff language continues to not clearly
7 allow AFP participants to earn forgiveness on catch-up payments and limits catch up payments to
8 two. Refusing to provide forgiveness for full payments which customers make because these
9 payments do not fall within a narrow time period fails to recognize the reality of the lived lives of
10 low income households and penalizes low income customers who often face additional economic
11 pressures as a result of a number of factors, including fluctuations in their monthly incomes,
12 reliance on fixed incomes, or other financial emergencies and unforeseen expenses which stretch
13 their already limited monthly budgets. It also discourages payment in full when that payment can
14 be made. The AFP is an alternative collections program which should be designed to incentivize
15 low income households with insufficient resources to prioritize payment of Pittsburgh Water bills.

16 The AFP must be designed to adequately acknowledge the realities faced by low income
17 households who, by definition, have inadequate incomes to pay for necessities, including housing
18 costs, food, energy costs, childcare, and transportation. As such, Pittsburgh Water’s program and
19 tariff language should be modified to make clear that AFP participants will receive forgiveness for
20 each in full payment regardless of whether the payment is made on time.

21 Additionally, Pittsburgh Water should eliminate the restriction that a household only can
22 make two catch up payments before being removed from AFP. Removal from AFP causes a
23 cascade of consequences where a household may have their full bill accelerated such that their past

1 due balance is immediately due. While households need to make payments to remain in BDP and
2 receive AFP forgiveness, limiting the number of catch-up payments to two does not serve
3 customers well. Instead, customers should be able to make any and all catch up payments in order
4 to remain in BDP and receive AFP forgiveness so long as they remain a customer. The remedy for
5 Pittsburgh Water for customers who are not paying BDP bills is to place them in the normal
6 collections process that includes the possibility of termination of service rather than removing
7 them from BDP and AFP. Customers should be able to catch up past-due BDP bills and receive
8 AFP so long as they remain a customer.

9 **Q: Do you have concerns about the interaction between AFP and BDP?**

10 A: Yes. I am concerned that Pittsburgh Water appears to be proposing to continue to operate
11 its AFP separately from its BDP. These should be viewed as two integral and inseparable programs
12 under the umbrella of a customer assistance program. As discussed, as of July 2025, Pittsburgh
13 Water reports that only 844 customers were enrolled in the AFP.¹³³ By comparison, Pittsburgh
14 Water reports 8,538 customers enrolled in the BDP as of July 2025, of which 976 BDP accounts
15 carried balances but were not enrolled in the AFP.¹³⁴ For customers not enrolled in the AFP,
16 Pittsburgh Water indicates that, if a customer reaches out to its PGH2O Cares team related to an
17 account balance and/or related to the BDP, they are vetted for the AFP.¹³⁵ In addition, Pittsburgh
18 Water explains that customers do not need to apply directly for the AFP. Instead, customers “who
19 enroll in the Bill Discount Program *and who also enroll in a payment arrangement* automatically
20 receive arrearage forgiveness with each on-time payment in an active payment plan.”¹³⁶ As

¹³³ Pittsburgh Water response to OCA 4-3, Attachment, “Arrearage Forgiveness”, attached hereto at Appendix B.

¹³⁴ Pittsburgh Water response to OCA 4-3, Attachment, “BDP”; “Arrearage Forgiveness” and Pittsburgh Water response to I&E RE-29, Attachment, “Summary”, attached hereto at Appendix B.

¹³⁵ Pittsburgh Water response to OWT 2-16.C., attached hereto at Appendix B.

¹³⁶ Pittsburgh Water response to OWT 2-24, attached hereto at Appendix B. (emphasis added).

1 articulated above, I have the same concerns about the requirement of BDP enrollees to enroll in a
2 payment plan to participate in the AFP. This copayment requirement should be eliminated. In
3 addition, the AFP should operate as a streamlined component of the BDP – allowing BDP enrollees
4 with arrears to receive the benefits of AFP without taking any further steps to enroll. This
5 streamlined program design is consistent with best practices and nearly every other utility rate
6 assistance program in the state.

7 **Q: What does Pittsburgh Water propose for the current BDP participants with balances**
8 **who are not receiving AFP benefits?**

9 A: Pittsburgh Water does not specifically explain how it intends to treat current BDP
10 participants that are not currently receiving arrearage forgiveness through the AFP. Based on
11 available data, there are 976 customers already enrolled in the BDP who have balances but not the
12 AFP, it is unclear how Pittsburgh Water plans to promptly enroll these customers in the AFP.
13 Counsel for OWT will brief the legal issues related to whether Pittsburgh Water has fulfilled its
14 obligations under the approved Settlement in the last rate proceeding related to the AFP. That said,
15 based on my review of the cost projections and exhibits it appears that Pittsburgh Water seeks to
16 enroll these customers in AFP only at the time of their two year recertification.¹³⁷ Delaying
17 provision of AFP benefits for existing BDP customers until their recertification date unnecessarily
18 delays arrearage forgiveness for customers who have already taken affirmative steps to enroll in
19 the BDP, and creates an arbitrary distinction between existing and new BDP enrollees, and risks
20 significant hardship for these households.

¹³⁷ Pittsburgh Water Response to I&E RE-29, Attachment, “Summary”, attached hereto at Appendix B.

1 **Q: Do you have a recommendation about what should occur?**

2 A: Yes. All BDP participants that have arrears and are not enrolled in AFP should be enrolled
3 in AFP within 60 days of the effective date of rates. Pittsburgh Water should work with its LIAAC
4 to develop outreach and education to these customers to explain that their arrears will be forgiven
5 with each in full BDP payment moving forward and that they do not have to enter a payment
6 arrangement to receive this forgiveness. If Pittsburgh Water’s systems do not have the ability to
7 automatically provide arrearage forgiveness for BDP customers with pre-program arrears, I
8 recommend that BDP customers who are not enrolled in the AFP should be given an opportunity
9 to enroll in the AFP prior to their recertification dates by letter, as well as through additional
10 outreach - including outbound calls or text messages.

11 Pittsburgh Water should also clarify that all new BDP participants who enroll in BDP from
12 the effective date of these changes and who have arrears will automatically be enrolled in AFP
13 without an additional application and without additional steps. In other words, from the time these
14 changes are made, BDP and AFP should be viewed as two components that are linked in an overall
15 customer assistance plan, not as separate programs.

16 **Q: What is your final concern about Pittsburgh Water’s AFP?**

17 A: I am concerned that Pittsburgh Water does not appear to track a significant amount of data
18 necessary to assess the effectiveness of the AFP. When asked in response to discovery to provide
19 the following metrics, Pittsburgh Water indicated that they do not have a mechanism which permits
20 such data to be tracked and reported.¹³⁸

- 21 • The number of customers removed from the AFP, by reason of removal;
- 22 • Mean and median AFP forgiveness dollars provided to customers;

¹³⁸ Pittsburgh Water response to OWT 2-27, attached hereto at Appendix B.

- 1 • The number of participants who had their entire arrearage balances forgiven
2 through the AFP;
- 3 • The mean arrearage balance for participants enrolled in the AFP per calendar
4 quarter;
- 5 • The mean length of time it would take to completely retire mean arrearage balances
6 for AFP participants.

7 Each of these metrics represents crucially important data which is necessary to gauge
8 whether the AFP is providing its participants with a reasonable means to manage and ultimately
9 retire their arrearages and should be tracked. I recommend that Pittsburgh Water be required to
10 track these metrics, disaggregated on a monthly and yearly basis, and be required to report on these
11 metrics to its LIAAC on a quarterly basis.

12 **Q: Please summarize your recommendations related to Pittsburgh Water’s AFP.**

13 A: Yes. As discussed in detail above, I recommend that:

- 14 • The AFP is integrated as a component of the BDP, so that BDP customers who carry pre-
15 program arrears which are eligible for AFP forgiveness should be able to automatically
16 access arrearage forgiveness.
- 17 • Pittsburgh Water revise its tariffs – as well as attendant policies, procedures, training
18 materials, and call scripts – to make clear that AFP participants are not required to enter
19 payment arrangements or provide any form of copay towards their pre-program arrears to
20 qualify for the AFP.
- 21 • The AFP is revised to allow its participants to earn forgiveness on catch-up payments.
- 22 • Pittsburgh Water be directed to meaningfully improve its tracking data related to its AFP,
23 as outlined above, and be required to report on these metrics to its LIAAC on a quarterly
24 basis.

25 I recommend that Pittsburgh Water be required to make the above reforms to its AFP no
26 later than 6 months from the effective date of rates in this proceeding, September 2026. I also
27 recommend that Pittsburgh Water be required to revise its tariff language related to its AFP as
28 follows. I have provided these recommended tariff changes in strike through for ease of reference:

1 (a) Customers receiving residential service pursuant to Rider BDP ~~who maintain an active,~~
2 ~~income based payment plan as documented by the Authority~~ shall be eligible to participate
3 in the Arrearage Forgiveness Program. Customers ~~who negotiate a payment arrangement~~
4 ~~for their pre-existing arrearages~~ who enroll in the BDP Program and have arrearages which
5 are accrued prior to entry in the BDP will be automatically have access to ~~enrolled in the~~
6 Arrearage Forgiveness benefits ~~Program~~.

7 ...

8 (c) The Authority will cease assessing any interest on the arrearages and pursuing collections
9 while ~~the customer is enrolled in the Arrearage Forgiveness Program in an active, income~~
10 ~~based payment plan~~.

11 (d) Should the participating customer fail to ~~keep up with their monthly BDP payments by~~
12 ~~the due dated default on the payment plan~~, he or she will have the opportunity to make ~~two~~
13 catch-up payments to continue to receive the benefits of the Arrearage Forgiveness
14 Program. Failure to make ~~the two~~ catch-up payments will result in the household being
15 placed in the normal collection process, including collections that may result in service
16 disconnection. ~~will result in immediate removal of the customer from the Arrearage~~
17 ~~Forgiveness Program~~. Any catch-up payments will be eligible for forgiveness credits for
18 the months which the payments were missed while the customer was enrolled in the AFP.

19 d. Hardship Fund

20 **Q: Please briefly describe Pittsburgh Water’s Hardship Fund.**

21 A: Pittsburgh Water’s Hardship Fund Program is administered by Dollar Energy Fund (DEF)
22 and provides emergency grant assistance of up to \$450 for households with income at or below
23 200% FPL who are facing a hardship. Eligible applicants can receive a grant once every 12 months
24 for water and wastewater, respectively.¹³⁹

25 **Q: Is Pittsburgh Water proposing to make any changes to its Hardship Fund pursuant**
26 **to the present rate filing?**

27 A: Yes. As discussed, Pittsburgh Water proposes that Hardship Fund grant recipients will be
28 automatically enrolled in the BDP.¹⁴⁰ I am supportive of this proposal as noted above.

¹³⁹ Pittsburgh Water Exhibit JAM-4.

¹⁴⁰ Pittsburgh Water Exhibit JAM-17, p. 17.

1 **Q: Please describe how Pittsburgh Water’s Hardship Fund is currently funded.**

2 A: The Hardship Fund Program was originally funded with \$500,000 received as a result of a
3 legal settlement.¹⁴¹ Pursuant to the Settlement approved by the Commission in Pittsburgh Water’s
4 2023 rate proceeding, Pittsburgh Water agreed to include an allocation in rates as necessary to
5 continue to fund the Hardship Fund when current settlement funds are exhausted and to the extent
6 employee and other volunteer donations are insufficient.¹⁴² As a result of this Settlement
7 obligation, Pittsburgh Water paid the following amounts to replenish its Hardship Fund:¹⁴³

- 8 • \$101,250 on 4/1/2024
- 9 • \$200,000 on 4/24/2024
- 10 • \$200,000 on 7/25/2024
- 11 • \$50,000 on 11/21/2024
- 12 • \$600,000 on 12/24/2024

13 In addition to these contributions, Pittsburgh Water appears to source a portion of Hardship
14 Funds through donations.¹⁴⁴ In 2024, Pittsburgh Water reports that, as of December 31, 2024,
15 \$1,042,051 was contributed to its Hardship Fund, sourced from its operating budget and
16 donations.¹⁴⁵ Pittsburgh Water projects annual funding levels of \$900,000 for 2026-2028.¹⁴⁶

17 **Q: Do you have any concerns related to Pittsburgh Water’s Hardship Fund which you**
18 **would like to address in the context of this testimony?**

19 A: Yes. First, I am concerned that the Hardship Fund is not adequately funded to serve the
20 well documented need for assistance for Pittsburgh Water’s low income customers. As evidenced

¹⁴¹ See Implementation of Chapter 32 of the Public Utility Code RE: Pittsburgh Water and Sewer Authority, Compliance Plan, Docket Nos. M-2018-2640802 and M-2018-2640803 (Compliance Plan filed April 27, 2020)..

¹⁴² Pa. PUC v. PWSA, Order, Docket Nos. R-2023-3039919, et al (Order entered Jan. 18, 2024, approving Joint Petition for Settlement, Paragraph E.4.C.).

¹⁴³ Pittsburgh Water response to OWT 2-8, E, attached hereto at Appendix B.

¹⁴⁴ Pittsburgh Water response to OWT 2-10, attached hereto at Appendix B.

¹⁴⁵ Id.

¹⁴⁶ Pittsburgh Water response to OWT 2-9; OWT 2-10, attached hereto at Appendix B.

1 by the disproportionately high arrearage levels carried by Pittsburgh Water’s low income
2 customers, discussed above, Pittsburgh Water’s low income customers are struggling to afford
3 basic services, even at present rates – and face extraordinarily high water and wastewater burdens.
4 Despite this clear need, Pittsburgh Water has issued comparably few Hardship Fund grants:

5 **Table 19: Hardship Fund Applicants and Hardship Fund Grants Awarded¹⁴⁷**

	2022	2023	2024	2025 (Jan-June)
Total HF Applications	369	582	1167	735
Total Awarded HF Grants	337	532	1100	697
Water & Sewer or Water Only, HF Grants	232	379	751	418
Sewer Only, HF Grants	131	198	410	215

6 While it appears that a significant portion of Hardship Fund grants were approved, the
7 number of applicants to the Hardship Fund is low compared to the number of BDP customers in
8 arrears. For example, between January and June 2025, Pittsburgh Water reports that it issued 697
9 Hardship Fund grants. By comparison, as of just one point in time (April 1, 2025), Pittsburgh
10 Water reports that 976 BDP customers had past due balances.

11 I am similarly concerned that, despite the clear need for grant assistance by its low income
12 customers, Pittsburgh Water’s Hardship Fund is underspent compared to the need. The following
13 Table shows unspent Pittsburgh Water Hardship Funds by year from 2022 through June 2024:

¹⁴⁷ Pittsburgh Water response to OWT 2-2, 3 and 5, Attachment, attached hereto at Appendix B.

1 **Table 20: Unspent Pittsburgh Water Hardship Funds (2022-June 2025)¹⁴⁸**

Hardship Fund Balance as of:	Hardship Fund Balance:
Dec. 31, 2022	\$213,993
Dec. 31, 2023	\$85,998
Dec. 31, 2024	\$28,670
June 30, 2025	\$193,682

2 As the above Table illustrates, Pittsburgh Water is significantly underspending its allocated
 3 Hardship Funds, with \$28,670 funds unspent at the end of 2024. This data shows the need for
 4 Pittsburgh Water to better connect its customers with Hardship Fund assistance.

5 **Q: Do you have any other concerns about Pittsburgh Water’s Hardship Fund that you**
 6 **would like to address in the context of your direct testimony?**

7 A: Yes. Pittsburgh Water’s Hardship Fund grant allows a customer to receive up to \$450 each
 8 for water and wastewater charges.¹⁴⁹ Hardship Fund applicants can only receive a grant once every
 9 12 months.¹⁵⁰ I am concerned that customers who are not dual service customers, but may have
 10 high arrearage balances accumulated in water or wastewater – offering a \$450 grant for water and
 11 \$450 grant for wastewater is insufficient to meet the needs for grant assistance of Pittsburgh
 12 Water’s low income customers. As shown in Table 7 above, the average arrearage levels of BDP
 13 customers was significantly higher than this \$450 maximum, with Pittsburgh Water reporting an

¹⁴⁸ Pittsburgh Water response to OWT 2-9, attached hereto at Appendix B.

¹⁴⁹ Pittsburgh Water St. 6 at 46-47.

¹⁵⁰ Id.

1 average arrearage level of approximately \$1,440 for its BDP participants as of June 2025.¹⁵¹ As a
2 function of averages, many low income customers will have arrearage balances exceeding these
3 amounts. Providing customers the ability to access one grant up to \$450 a year for water, and one
4 up to \$450 for wastewater, helps to expand access for some dual service customers. However,
5 customers who do not have combined service will be limited to one \$450 grant per year.

6 I am also concerned that Pittsburgh Water indicates in response to discovery that they do
7 not track several important metrics related to its Hardship Fund. In particular, I am concerned that
8 Pittsburgh Water indicates that they do not track who have received Hardship Fund grants by FPL
9 range.¹⁵² This is important information to determine whether customers at the very bottom of the
10 poverty scale – those under 50% FPL – who represent those households with the greatest economic
11 need are adequately and equitably accessing the Hardship Fund. I am also concerned that
12 Pittsburgh Water does not appear to track the number of its BDP customers who receive a Hardship
13 Fund grant.¹⁵³ Determining to what extent BDP customers have had to rely on Pittsburgh Water’s
14 Hardship Fund provides important information about whether BDP customers are facing
15 unaffordability challenges which require Hardship Funding to mitigate.

16 **Q: What changes do you recommend related to Pittsburgh Water’s Hardship Fund?**

17 A: I have already discussed my recommendations for how Pittsburgh Water should expand
18 outreach and enrollment across all its low income assistance programs. In addition, I recommend
19 that Pittsburgh Water take several additional steps to improve the accessibility of its Hardship
20 Fund to address the significant unmet need of its low income customers. These modifications are

¹⁵¹ Supra, Table 7; Pittsburgh Water response to OWT 1-19, Attachment, “BDP”, attached hereto at Appendix B.

¹⁵² Pittsburgh Water response to OWT 2-4, attached hereto at Appendix B.

¹⁵³ Pittsburgh Water response to OWT 2-6, attached hereto at Appendix B.

1 essential to improve access to Hardship Fund assistance and, in turn, to mitigate the effect on low
2 income households from the hardship that would result if Pittsburgh Water were permitted to
3 increase its rates within the context of the present proceeding.

4 First, I recommend that Pittsburgh Water permit households to apply and qualify for
5 Hardship Fund assistance twice a year – regardless of whether a customer elects to apply each
6 grant to their water and wastewater accounts. As discussed, this change will help customers to
7 meet their need for assistance, regardless of whether they have combined services, and will help
8 to address the high arrearage balances carried by many low income customers.

9 Second, I recommend that Pittsburgh Water revise its policies and procedures to require
10 customers to be provided with clearer information about how to access the Hardship Fund. Call
11 scripting provided by Pittsburgh Water for its Customer Service Representatives (CSRs) directs
12 CSRs to provide information related to payment arrangements, the BDP, and AFP if customers
13 have past due balances, are facing service termination, or have already lost service.¹⁵⁴ However,
14 customers are not screened for, or provided any information related to, the Hardship Fund
15 Program. To address the low uptake rate of the Hardship Fund, Pittsburgh Water should revise
16 policies, procedures, call scripts, and training materials so that customers are provided information
17 about and a referral to the Hardship Fund if they have a past due balance, are facing service
18 termination, or have already had their service terminated. If a customer indicates that they are
19 interested in applying for the Hardship Fund, they should be provided with a warm referral by
20 Pittsburgh Water’s CSRs to DEF, in a manner that does not require the customers to provide
21 duplicative information.

¹⁵⁴ Pittsburgh Water response to OWT 2-16, Attachment B, attached hereto at Appendix B.

1 Third, I recommend that Pittsburgh Water begin to track additional metrics related to its
2 Hardship Fund. Specifically, I recommend that Pittsburgh Water be required to track the number
3 of Hardship Fund applicants and recipients by FPL range, as well as the number of BDP customers
4 to have accessed the Hardship Fund. As discussed, these are important metrics to gauge the
5 economic hardship of low income customers, including BDP customers, and whether these
6 customers are equitably accessing grants funding.

7 **e. Line Repair and Water Conservation Program**

8 **Q: Please briefly describe Pittsburgh Water’s Line Repair and Water Conservation Pilot**
9 **Program.**

10 A: Pittsburgh Water’s Line Repair and Water Conservation (LRWC) Pilot Program is
11 available to customers with household income at or below 200% FPL and provides free leak repairs
12 related to exposed plumbing and installation of water saving devices.

13 Pursuant to the Commission approved Settlement, Pittsburgh Water agreed to a budget for
14 the LRWC Pilot Program of \$400,000.¹⁵⁵ In response to discovery, Pittsburgh Water indicates that
15 it interpreted this requirement to mean that “the total budget for the Line Repair and Conservation
16 Pilot Program would not exceed \$400,000.”¹⁵⁶ Pittsburgh Water explains that they initially
17 determined that they would be able to complete the Pilot with a total budget of \$396,500, but later
18 adjusted this budget to \$324,084 to reflect updated contractor pricing – and subsequently filed a
19 revised budget at Docket No. P-2022-3030253.¹⁵⁷ Pittsburgh Water indicates the following

¹⁵⁵ Petition of PWSA for Pilot Price Service Line Leak Repair and Expanded Conservation Program for Eligible Low Income Customers and Authorization to Track Costs as a Regulatory Asset for Future Base Rate Recovery, Joint Petition for Settlement, Paragraph B “Cost Recovery”, Order, Docket No. P-2022-3030253 (Order approving Joint Petition for Settlement entered March 2, 2023).

¹⁵⁶ Pittsburgh Water response to OWT 6-1, attached hereto at Appendix B.

¹⁵⁷ Id.

1 budgeted amounts for the LRWC Program between 2023 to date in 2025: \$324,084 in 2023;¹⁵⁸
2 \$260,004 in 2024; and \$95,000 2025 YTD.¹⁵⁹ Pittsburgh Water explains that annual amounts
3 budgeted after FY 2023 reflect estimated annual amounts that would be spent rather than the total
4 remaining budget for the LRWC Program.¹⁶⁰ As discussed below, Pittsburgh Water has greatly
5 underspent in its LRWC Program, compared to estimated annual budgets.

6 Importantly, Pittsburgh Water is greatly underspending available LRWC program funds
7 despite the clear need for usage reduction assistance of its low income customers. As discussed
8 above, as of June 2025, Pittsburgh Water reports 8,458 customers enrolled in the BDP.¹⁶¹ Out of
9 the total numbers of BDP participants, Pittsburgh Water further reports that, in 2025, 42% of BDP
10 participants had usage above 3,000 gallons/month – the median consumption for residential
11 customers as of June 2025. By comparison, Pittsburgh Water reports that, as of the date of the
12 filing of its rate proceeding, only 159 customers were assisted through the LRWC Program.¹⁶²

13 **Q: Is Pittsburgh Water proposing any changes to its Line Repair and Water**
14 **Conservation Pilot in the context of this proceeding?**

15 A: Yes. Pittsburgh Water proposes converting its Line Repair and Water Conservation
16 (LRWC) pilot program to a permanent program.¹⁶³ Pittsburgh Water reports that in 2024 LRWC
17 Program participants achieved a reduction in their monthly consumption by an average of 17%.¹⁶⁴
18 Pittsburgh Water proposes that the LRWC Program will be included in offerings of customer

¹⁵⁸ Pittsburgh Water response to OWT 6-1, attached hereto at Appendix B.

¹⁵⁹ Pittsburgh Water response to OWT 3.4.A.-B, attached hereto at Appendix B. Pittsburgh Water response to OWT 6-1, attached hereto at Appendix B.

¹⁶⁰ Pittsburgh Water response to OWT 6-1, attached hereto at Appendix B.

¹⁶¹ Pittsburgh Water response to OWT 1-1, Attachment, “BDP”, attached hereto at Appendix B.

¹⁶² Pittsburgh Water St. 6 at 6.

¹⁶³ Pittsburgh Water St. 1 at 4.

¹⁶⁴ Pittsburgh Water St. 6 at 32.

1 assistance program and will be funded through rates.¹⁶⁵ Pittsburgh Water has included \$150,000
2 in its revenue requirements for both the FPFTY and FY 2027.¹⁶⁶

3 Pittsburgh Water also proposes through this proceeding to increase the per-property benefit
4 from \$1,356 to \$1,600.¹⁶⁷ Pittsburgh Water indicates that this increase is based on contractor
5 feedback following appointments and will ensure that customers with repairs in excess of the
6 current limit will be covered in the LRWC in the future.¹⁶⁸ However, Pittsburgh Water indicates
7 that the increase to the maximum limit to \$1,600 is not expected to significantly increase the \$931
8 average repair cost.¹⁶⁹

9 **Q: Do you support Pittsburgh Water’s proposed changes to its LRWC Program?**

10 A: Yes. I support Pittsburgh Water’s proposal to make its line repair and conservation
11 offerings a permanent program. It appears that customers who access the LRWC Program achieve
12 meaningful bill savings. Data provided by Pittsburgh Water between September 7, 2023 – August
13 6, 2024 shows that that LRWC participants saved an average of \$130.39 on their monthly bills
14 after program measures.¹⁷⁰ These are significant bills saving and underscore the importance of
15 repair and conservation assistance to help control monthly bills – as well as potentially decrease
16 the cost of providing rate assistance and debt forgiveness through PWSA’s BDP and AFP for those
17 also enrolled in these other programs.

18 I also support Pittsburgh Water’s proposal to increase its per-property limit, through I
19 believe that the \$1,600 should be a target and/or an average cost per job rather than a strict per
20 customer limit as customers who may have repairs with costs more than the limit can access

¹⁶⁵ Pittsburgh Water St. 6 at 34.

¹⁶⁶ Id.

¹⁶⁷ Id.

¹⁶⁸ Id.

¹⁶⁹ Id.

¹⁷⁰ Pittsburgh Water response to OWT 3-7, Attachment, attached hereto at Appendix B (average monthly savings when utilizing the prior 12 month billed amount compared to the first bill post repair).

1 services under the program. Low income customers most often lack any discretionary income and
2 cannot reasonably afford the high costs of necessary repairs – including to customer-side service
3 lines. When faced with a high-cost repair, many low income households, unable to make repairs,
4 see their bills increase and soon face involuntary termination. It is essential that Pittsburgh Water
5 provide robust assistance to address need for repair assistance amongst its low income customers.

6 **Q: Are these changes to the LRWC sufficient?**

7 A: No. I am concerned that the effectiveness of the LRWC Program will continue to be limited
8 by (1) the Program failing to provide comprehensive usage reduction, repair, and conservation
9 measures; and (2) the low uptake of the Program despite the clear need for usage reduction services
10 by Pittsburgh Water’s low income customers. I will address each of these concerns in turn.

11 As noted, the LRWC Program currently provides free leak repairs on exposed plumbing
12 and installation of water saving devices to customers with household incomes at or below 200%
13 FPL.¹⁷¹ It appears that provision of water conservation savings devices are provided concurrently
14 with the provision of repair services.¹⁷² Pittsburgh Water’s proposed tariff indicates that the LRWC
15 Program, if approved as a permanent program, will be to address leaking pipes as well as old,
16 inefficient water fixtures, there is no indication how – and to what extent – Pittsburgh Water
17 intends to address the broader need for usage reduction services of its low income customers if
18 they are not experiencing leaks related to their exposed plumbing.¹⁷³ This is a shortcoming of the
19 program.

20 As discussed in detail above, Pittsburgh Water’s low income customers carry substantially
21 higher usage levels compared to residential customers overall. The higher usage levels of low

¹⁷¹ Pittsburgh Water Exhibit JAM-4.

¹⁷² Line Repair and Conservation Agreement, available at: <https://www.pgh2o.com/sites/default/files/2025-01/Line%20Repair%20and%20Conservation%20Agreement%201.7.25.pdf>. (last visited September 2, 2025)

¹⁷³ Proposed Tariff, Supplement No. 16; Tariff Water - Pa. P.U.C. No. 1 Original Page No. 19B.

1 income customers is likely due to a number of factors, including that low income households are
 2 more likely to live in older homes with inadequate, damaged, or leaky plumbing/ fixtures – and
 3 may experience higher usage levels as a result.¹⁷⁴ These households are less likely to be able to
 4 afford to fix leaks, damaged plumbing or customer-side service lines, or purchase and install water
 5 efficiency devices.¹⁷⁵ It is essential that low income customers are provided comprehensive usage
 6 reduction assistance to address these underlying causes of high usage which lead to higher bill
 7 amounts and higher arrearage levels.

8 I am also concerned that only a limited number of customers have been able to access
 9 services under the LRWC Program to date. The Table below shows the number of customers
 10 service through the LRWC Program, between 2023 and thus far in 2025:

11 **Table 21: LRWC Program Participants (2023-YTD 2025)¹⁷⁶**

	LRWC (Leak Repairs)
2023	46
2024	112
2025 (Jan. – Jul.)	71

12
 13 As the above Table shows, between 2023 and to date in 2025, only 229 customers received services
 14 through the LRWC Program.

15 Similarly, as discussed, Pittsburgh Water has expended only a portion of its budget for the
 16 LRWC Program in 2023 to date in 2025, as shown by the following Table:

¹⁷⁴ Gary Adamkiwicz et al., Moving Environmental Justice Indoors: Understanding Structural Influences on Residential Exposure Patterns in Low Income Communities, 101 Am. J. Public Health 238-245 (2016), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3222513/> (last visited September 2, 2025) (finding that low income households have a higher likelihood of inside water leaks, which in turn leads to increased mold and moisture in the home that can cause or complicate the health of family members); see also US Dep’t of Health, Office of Disease Prevention & Health Promotion, Social Determinants of Health: Quality of Housing (2020), available at: <https://health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/quality-housing>. (last visited September 2, 2025)

¹⁷⁵ Id.

¹⁷⁶ Pittsburgh Water response to OWT 3-3, Attachment, attached hereto at Appendix B.

1 **Table 22: LRWC Budgeted v. Actual Spending (2023-YTD 2025)¹⁷⁷**

	Budgeted	Spent
2023	\$396,500.00	\$43,099.00
2024	\$260,004.00	\$108,123.51
2025 YTD	\$95,000.00	\$33,186.30

2
 3 As the above Table shows, Pittsburgh Water only spent a fraction of budgeted dollars for
 4 the LRWC Program in 2023 and 2024 and has only spent approximately 35% of its available
 5 budget thus far in 2025. Notably, the budget for the LRWC decreased substantially between 2023
 6 and 2025. Pittsburgh Water’s proposed allocation of \$150,000 for the LRWC discussed above
 7 represents a reduction to the 2023 and 2024 LRWC budgets, despite the clear need for usage
 8 reduction services amongst Pittsburgh Water’s low income customers. While I support the
 9 proposed addition of \$150,000 for the budget, Pittsburgh Water should not turn any eligible
 10 customer away and the annual budget should not be viewed as a spending cap for the program.

11 I am similarly concerned that Pittsburgh Water’s current processes for screening and
 12 referring customers to the LRWC Program appear to be limited. Pittsburgh Water provided in its
 13 initial filing call scripting which describe examples of how its CSRs refer customers to this
 14 Program.¹⁷⁸ CSRs are directed per this script to screen for high consumption, and to ask if there’s
 15 any visible leaks to exposed pipes.¹⁷⁹ If this customer indicates that they are aware of such leaks,
 16 they are only then referred to the LRWC Program.¹⁸⁰ While these procedures help to direct

¹⁷⁷ Pittsburgh Water response to OWT 3.4.A.-B, attached hereto at Appendix B.

¹⁷⁸ Pittsburgh Water Exhibit JAM-9.

¹⁷⁹ Id.

¹⁸⁰ Id.

1 customers with certain visible leaks to the LRWC Program, Pittsburgh Water’s referral processes
2 fail to direct many customers who are in need of repairs and usage reductions services to assistance.

3 I am also concerned about the limited scope of repairs included through the program,
4 including for water leaks inside drywall or flooring. These can be some of the more costly repairs,
5 and if unresolved can quickly create habitability issues in the home – as well as raise water and
6 wastewater rates substantially. Low income households are unlikely to be able to shoulder the high
7 costs of these repairs and will not, as it is currently structured, be able to access LRWC assistance
8 to remediate these issues.

9 Finally, I am concerned that it appears that customers are only eligible of the LRWC
10 Program if they are actively enrolled in the BDP.¹⁸¹ While I am certainly supportive of Pittsburgh
11 Water ensuring that its low income customers access its assistance programs, including its BDP,
12 in a comprehensive an integrated manner, requiring that LRWC Program participants are enrolled
13 in the BDP prior to receiving critical repair and conservation measures creates a barrier to receive
14 LRWC services, and further drives down program participation.

15 **Q: Do you have any recommendations related to the LRWC Program?**

16 A: Yes. I recommend that Pittsburgh Water develop and implement comprehensive
17 improvements to its conservation and line repair/replacement program available to all customers
18 at or below 200% FPL. A comprehensive conservation and line repair/replacement assistance
19 program that not only repairs exposed plumbing, but that also makes more comprehensive fixes to
20 plumbing issues that cause high bills will help to reduce inefficiencies in low income participants’
21 homes and control BDP and AFP program costs. With the substantial rate increase that Pittsburgh
22 Water is proposing, and the preexisting unaffordability at existing rates, a comprehensive

¹⁸¹ Id.

1 conservation and line repair program is essential to mitigate the costs of unaffordability both at
2 existing and proposed rates for low income customers with higher usage levels. This program
3 should include conservation measures, including provision of water conservation kits, but also
4 include deeper savings measures – including service line repair and replacement.

5 Repair and replacements assistance should be offered in a more comprehensive manner,
6 and not just when a low income customer has exposed, visible leaks. Data provided by Pittsburgh
7 Water in response to discovery reveals a variety of reasons that a repair under its current LRWC
8 may not be covered, including leaking drain pipes.¹⁸² I recommend that Pittsburgh Water work
9 with its LIAAC to develop a broader and more comprehensive list, of measures to be covered
10 under the LRWC Program.

11 I also recommend that Pittsburgh Water eliminate its current requirement that customers
12 must be enrolled in the BDP to participate in the LRWC Program. If a customer is otherwise
13 eligible for the LRWC Program, they should be provided a warm referral to enroll in the BDP.
14 However, they should not be prevented from receiving usage reduction and repair assistance until
15 they have enrolled in the BDP. For existing BDP customers, I recommend that this Program target
16 high usage low income customers enrolled in the BDP. Targeting BDP customers with high usage
17 will help to prioritize customers who have already had affordability challenges, and who have
18 enrolled in the BDP, and help to control BDP cost which may exist as a result of high usage
19 stemming from unaffordable repairs and upgrades in low income households.

20 Finally, Pittsburgh Water should be required to coordinate its service delivery with other
21 utilities in its service territories that operate energy efficiency and conservation programs, such as
22 Low Income Usage Reduction Programs (LIURP) and Act 129 programs. Many utility

¹⁸² Pittsburgh Water response to OWT 3-6, Attachment, attached hereto at Appendix B.

1 conservation programs already provide a number of measures that increase water efficiency in
2 homes, such as low flow faucets and shower heads.¹⁸³ Partnering with other energy efficiency
3 programs will not only allow Pittsburgh Water to leverage other utility conservation programs, it
4 will also ensure that customers can obtain comprehensive conservation measures to reduce their
5 overall water and energy usage.

6 I recommend that Pittsburgh Water be required to implement the comprehensive repair and
7 usage reduction program, as I have outlined above, within 6 months of effective date of rates in
8 this proceeding.

9 **f. Leak Repair Program**

10 **Q: Please briefly summarize Pittsburgh Water’s proposed improvements to the process**
11 **for customers to obtain leak credits.**

12 A: Pittsburgh Water witness, Ms. Mechling, explains that, when a customer files a dispute or
13 complaint related to high Pittsburgh Water bills and a known leak on their property, the customer
14 must currently make the leak repair and file a Leak Credit request with ALCOSAN.¹⁸⁴ If the
15 customer is income eligible, the leak repair can be facilitated through the LRWC Program.¹⁸⁵ This
16 review process often takes months, and normally results in a reduction to billed usage to decrease
17 ALCOSAN charges and Pittsburgh Water wastewater conveyance charges.¹⁸⁶ Pittsburgh Water is
18 proposing to implement a process and revise its tariff accordingly to allow customers to:

- 19 • Provide evidence that the leak causing higher usage was repaired; and,
20 • Enroll in free leak alerts from the Customer Advantage Portal.

¹⁸³ See 52 Pa. Code § 58.14.

¹⁸⁴ Pittsburgh Water St. 6 at 38.

¹⁸⁵ Id.

¹⁸⁶ Id.

1 Pittsburgh Water has the discretion to reduce the initial invoice for the customer down to the
2 average monthly consumption for the customer, calculated based on the average number of gallons
3 used in a 12 month period preceding the apparent beginning of the leak.¹⁸⁷ Pittsburgh Water would
4 also have the discretion to reduce the subsequent invoice for higher than usual charges down to
5 the average monthly consumption for the customer. These reductions would only be applied once
6 per incident and per customer throughout their residency at a particular property.¹⁸⁸

7 It appears that a sizable number of customers would potentially be able to receive leak credits
8 through this process based on the number of customers who received a reduction in their Pittsburgh
9 Water charges after filing a leak credit request with ALCOSAN: 514 customers in 2023; 286
10 customers in 2024, and 172 customers between January and July 2025.¹⁸⁹

11 **Q: Do you support Pittsburgh Water’s proposed changes to how certain customers**
12 **receive leak credits, as you have outlined?**

13 A: Yes. Pittsburgh Water’s proposal will help to streamline the process for how customers
14 who file leak reports are able to obtain adjustment to their Pittsburgh Water charges after they are
15 able to mitigate these leaks. This will help incentivize customers to make necessary leak repairs
16 and mitigate costs for customers which often occur as a result of home repair emergencies.

17 As discussed, low income customers cannot afford to make necessary repairs to mitigate
18 leaks and to receive leak credits. I support Pittsburgh Water’s proposal to refer low income
19 customers to the LRWC Program to help with necessary repairs. However, I believe that this leak
20 credit offering should be integrated better into the comprehensive LRWC Program which I
21 recommend above. Thus, when a customer who is low income indicates high usage, they should

¹⁸⁷ Pittsburgh Water St. 6 at 38-39.

¹⁸⁸ Id.

¹⁸⁹ Pittsburgh Water response to OWT 3-13, Attachment, attached hereto at Appendix B.

1 be referred to both the LRWC Program and to receive a leak credit once the repairs are made. This
2 will help streamline participation in both offerings, and help customers to better access repair,
3 conservation, and leak credit offerings in a timely manner to help more swiftly alleviate the
4 financial burden associated with a water leak.

5 **VI. Customer Service and Quality of Service Issues**

6 **Q: Please describe this section of your testimony.**

7 A: In this section of my testimony, I examine Pittsburgh Water’s quality of customer service
8 that the Authority provides to residential customers, including: (1) its decision to defer certain
9 stormwater replacement projects, (2) its proposal to remove the 60-day safe-harbor period before
10 changing a customer’s stormwater fee based on a redesignation of ERUs; (3) its decision to revert
11 to its prior policy of requiring individual residential customers to pay a convenience fee for
12 payment of their bills while using credit and debit cards; (4) its decision to provide a bill credit to
13 encourage customers to set up electronic billing; and, (5) its decision to forgo proposing a damaged
14 wastewater lateral program in this proceeding.

15 **VII. Storm Water Planning**

16 **Q: Do you have concerns about the fact that Pittsburgh Water is delaying some needed**
17 **stormwater mitigation projects despite already engaging in community outreach and**
18 **planning for these projects?**

19 A: Yes, I have significant concerns that Pittsburgh Water’s public relations and outreach has
20 led to commitments that the Authority is choosing not to meet within its existing stormwater capital
21 improvement plan (CIP) over the next several years. Yet, at the same time, the Authority has
22 dedicated significant capital to projects that are prioritized by the City of Pittsburgh. For example,
23 in her testimony on these issues, Pittsburgh Water Witness Kate Mechler highlights the fact that

1 the Authority acts as the agent for the City of Pittsburgh to perform maintenance of all publicly
2 owned catch basins¹⁹⁰ and that in FY 2026 and FY 2027 combined the Authority will spend almost
3 \$3.3 million (34%) of a total \$9.6 million for that period on a project to repair and replace some
4 of this infrastructure. In addition, the Authority proposes to spend more than \$4 million (42%) of
5 the total \$9.6 million for FY 2026 and FY 2027 on Pittsburgh Regional Transit on the Bus Rapid
6 Transit (“BRT”) Project. Both projects total more than \$7.3 million of the total projected spending
7 on stormwater management in the Authority’s CIP over the FY 2026 and FY 2027 years.¹⁹¹ In
8 contrast, Ms. Mechler notes that there are several projects that are in its current CIP that the
9 Authority has chosen not to fund. She states: “For stormwater, construction was deferred for six
10 projects that are currently in various stages of planning and design. These projects include Fowler
11 Park, Oakridge Stormwater Separation, Southside Park, Four Mile Run, Stewart Avenue, and
12 MLK Field.”¹⁹²

13 **Q: Please elaborate on your concerns.**

14 A: My concern stems from the fact that Pittsburgh Water has a Stormwater Strategic Plan that
15 it has articulated informs its prioritization of work on storm water issues, including a ranking of
16 priority water sheds where work is prioritized and funded. In response to discovery, Pittsburgh
17 Water indicated that is has used “the priority sheds identified in the Stormwater Strategic Plan as
18 a key factor in ranking potential projects during the Capital Improvement Planning process.
19 Projects located in higher priority sheds are given a higher weight, ensuring that funding and
20 resources are directed towards areas with the most significant needs or impacts.”¹⁹³ Despite this,

¹⁹⁰ Pittsburgh Water St. 4 at 13:6-7.

¹⁹¹ *Id.* at 18-19. See also, Pittsburgh Water’s Capital Improvement Plan for 2025-2029 available at: https://www.pgh2o.com/sites/default/files/2025-03/2025-2029%20CIP_FINAL_3.3.25.pdf (last visited August 19, 2025).

¹⁹² Pittsburgh Water St. 4 at 20:16-19.

¹⁹³ Pittsburgh Water response to OWT 5-6(a), attached hereto at Appendix B.

1 the projects that the Authority has prioritized for 66% of its stormwater mitigation funding are in
2 lower priority watersheds than those that it has deferred and elected not to fund over the next two
3 years.

4 **Q: What reason does Pittsburgh Water provide for deferring funding for these projects?**

5 A: Pittsburgh Water asserts that because the last rate case had a stay out clause that prohibited
6 a rate increase to begin prior to January 1, 2026, along with “the denial of Pittsburgh Water’s prior
7 multi-year rate increase request, forced Pittsburgh Water to dramatically reduce its CIP starting in
8 FY 2026.”¹⁹⁴ They ominously warn: “Failure to approve the full amounts of the revenue
9 requirements would further decrease sewer and stormwater infrastructure improvements.”¹⁹⁵

10 **Q: What is your response to these concerns?**

11 A: I certainly understand that Pittsburgh Water must manage its programs within a budget,
12 but Ms. Mechler’s statements amount to gaslighting of other parties and the Commission for
13 Pittsburgh Water’s inadequate prioritization and planning and its decision to agree to settlement
14 terms – such as a reduced revenue requirement, a stay out, and withdrawal of its previous requests
15 for a multi-year rate plan.¹⁹⁶ No one forced Pittsburgh Water to enter a settlement in the last rate
16 case or any of the rate cases that preceded it. No one forced Pittsburgh Water to agree to a rate
17 case stay out or to withdraw its proposal for a multi-year rate increase. These were concessions
18 that the Authority made in an overall settlement agreement. All parties make concessions in
19 settling cases, and it is patently unreasonable for Pittsburgh Water to hold those settlements up as
20 a reason why it cannot meet its commitments in its CIP. Pittsburgh Water has many resources at
21 its disposal to fund these projects other than ratepayer funds and bond debt, including applying for

¹⁹⁴ Pittsburgh Water St. 4 at 21:1-3.

¹⁹⁵ *Id.* at 21:6-8.

¹⁹⁶ Pa. PUC v. PWSA, Order, Docket Nos. R-2023-3039919 (Order entered Jan. 18, 2024, approving Joint Petition for Settlement filed Oct. 30, 2023, with modification).

1 grants and loans from PENNVEST. Since PENNVEST loans are paid from through a PENNVEST
2 rider that is reconcilable and not tied to base rates, this along with the increase in the DSIC that is
3 sought in this case, should significantly mitigate what Pittsburgh Water describes as the “stop and
4 go” effect of its planning.

5 **Q: Do you have specific recommendations for the 2026 and 2027 planning period for**
6 **stormwater project funding?**

7 A: Yes. I have several. First, Pittsburgh Water should begin to more closely follow its strategic
8 plan and prioritize those projects that it has deferred for funding based on their rank in its storm
9 water strategic plan. In response to discovery, Pittsburgh Water indicated that it considers its
10 strategic plan to be “aspirational” and provides guidance only to Pittsburgh Water.¹⁹⁷ This should
11 change. While Pittsburgh Water needs operational flexibility to ensure that it can re-prioritize
12 funding and work as necessary, its strategic plan should provide the foundation such that members
13 of the public have a roadmap, plans, and timelines when the highest priority projects will be
14 completed. To that end, Pittsburgh Water should ensure that all the projects identified in the
15 developmental stage that have since been deferred have clear timelines for completion before the
16 end of their current CIP.

17 Second, I also recommend that Pittsburgh Water more clearly communicate with
18 stakeholders within the impacted projects and watersheds about the timelines for their completion.
19 As evidenced by the testimony of many members of the public during public input hearings, there
20 are deep concerns about Pittsburgh Water’s lack of communication during this process.¹⁹⁸ More

¹⁹⁷ Pittsburgh Water response to OWT 5-3, attached hereto at Appendix B.

¹⁹⁸ See Tr. of Proceedings, Testimony of Anna Dekleva, at 81:8-17 (“I do not see sufficient evidence that this rate increase will benefit the people of Pittsburgh. My neighbors in the Run experience routine flooding that has not been adequately addressed with available solutions, despite persistent advocacy and despite a recent increase in rates

1 transparency and communication is needed. I specifically recommend that Pittsburgh Water be
2 required to submit progress reports which is available publicly and its publishes on its website
3 which detail to what extent it has implemented the goals and projects set forth in its Stormwater
4 Strategic Plan. I recommend that these reports be published on an annual basis. I also recommend
5 that these reports contain any updates that Pittsburgh Water may have related to how it intends to
6 implement the goals and projects contained in the Stormwater Strategic Plan, and how it intends
7 to engage with stakeholders related to these goals and projects.

8 **a. Notice of Redesignation of ERUs.**

9 **Q: What changes to its tariff does Pittsburgh Water propose regarding notice to**
10 **customers of adjustments to its ERU designation?**

11 A: Under its current tariff, if Pittsburgh Water adjusts a customer’s ERU designation either up
12 or down based on new information about the property, Pittsburgh Water will provide 60 days
13 advance notice of the effective date of the ERU to allow the household to challenge the adjustment
14 before it takes effect.¹⁹⁹ Pittsburgh Water is proposing to eliminate the requirement that it provide
15 60-day advance notice, and instead proposes to only provide notice at the time an ERU adjustment
16 is made as a result of impervious area updates or annual parcel updates, allowing adjustment of
17 the customer’s bill to take effect immediately.²⁰⁰ The modified language also clarifies that notice
18 is not required when the change was initiated by the customer.

specifically for stormwater. There is little transparency available to the people as to how our stormwater fees are being spent specifically.”); Tr. of Proceedings, Testimony of Ray Gerard, at 89:9-99:14; 104:14-106:4 (explaining concerns about flooding and deferred plans to address flooding in Four Mile Run as well as lack to transparency about the process); Tr. of Proceedings, Testimony of Ziggy Edwards, at 108:9-112:6) (discussing concerns storm water planning and coordination); Tr. of Proceedings, Testimony of Anne Quinn, at 187:24-201:1 (discussing concerns about a lack of transparency and the failure to follow through in priority areas).

¹⁹⁹ Pittsburgh Water St. 4 at 27.

²⁰⁰ Id.

1 **Q: What is the reason that Pittsburgh Water provides for making this change?**

2 A: Pittsburgh Water witness Mechler asserts that “the process to provide 60-day written
3 advance notice of ERU changes has proven to be overly burdensome in terms of customer service
4 staff time, printing and mailing costs, and in development of technology to carry out this
5 requirement.”²⁰¹ She also asserts that a number of the customer-initiated requests fall within this
6 process – such as when “parcels are aggregated or split and thus resulting in changes to the billed
7 ERU”²⁰²

8 **Q: Do you support these changes to Pittsburgh Water’s tariff?**

9 A: Not entirely, no. I have two separate concerns. First, I do not support Pittsburgh Water’s
10 proposal to eliminate *advance* notice to customers when the ERU redesignation would result in an
11 increase in monthly storm water expenses for the customer that was the result of a Pittsburgh Water
12 directed impervious area update or annual parcel update. In those situations, customers should still
13 receive 60-day advance notice of the proposed changes. Customers, particularly low income
14 customers, should not have their rates increased by Pittsburgh Water because of a Pittsburgh Water
15 driven-ERU redesignation without advance notice and an opportunity to challenge the assessment
16 before that assessment is made. The ability to issue a credit following a successful challenge is not
17 an appropriate resolution, as it does not alleviate the potential harm caused to the customer as a
18 result of the original assessment.

19 Second, I do not support Pittsburgh Water’s proposal to eliminate all notice when the ERU
20 redesignation is the result of customer-led changes – such as parcel consolidation or split. In the
21 case of customer-led redesignations, I do not have concern that these customers receive *advance*
22 *notice* because I agree that when the change was customer led the customer will likely understand

²⁰¹ *Id.* at 27:16-19.

²⁰² *Id.* at 28:4-5.

1 that the change will result in a change to their monthly stormwater fee. However, Pittsburgh Water
2 should provide notice at the time that the change is made in its system so customers will still
3 receive notice separate from their bill. In general, I do not believe that it is sufficient for Pittsburgh
4 Water to rely on the bill as a method of notifying customers of rate changes, even those that result
5 from customer-led initiatives.

6 **b. Bill Payment Methods**

7 **Q: Based on the data available in this proceeding, in what ways can a residential**
8 **customer pay their bills?**

9 A: Pittsburgh Water customers can pay their bills by check, direct transfer from a checking or
10 savings account via ACH, debit card and credit card and in cash at select retailers listed on the bill
11 coupon.²⁰³ Currently, the costs and fees associated with customers paying their bills by check,
12 ACH, debit or credit cards are included in rates and no separate or additional fee is charged to a
13 customer. However, Pittsburgh Water does not cover the cost of customers paying in cash at
14 authorized retailers and the fee to do so is \$1.49 per transaction.²⁰⁴

15 **Q: Is Pittsburgh Water proposing to make any changes to its bill payment methods in**
16 **this case?**

17 A: Yes. Pittsburgh Water is proposing to remove from rates the costs associated with
18 customers paying their bills by credit and debit cards and proposes to reimpose those costs onto
19 customers.²⁰⁵

²⁰³ Pittsburgh Water Response to OWT 3-23 and 24, attached hereto at Appendix B.

²⁰⁴ Pittsburgh Water response to OWT 3-23, attached hereto at Appendix B.

²⁰⁵ Pittsburgh Water St. 2 at 26.

1 **Q: What reasons does Pittsburgh Water provide for proposing this change in this case?**

2 A: Other than vague assertions that it would be fairer because it would treat all customer
3 classes the same²⁰⁶ and that it is a rate mitigation tool,²⁰⁷ Pittsburgh Water states that it would
4 allow them to remove approximately \$500,000 in fees per year from the revenue requirement.²⁰⁸

5 **Q: Do you support Pittsburgh Water’s decision to return these fees to customers rather
6 than including them in the revenue requirement?**

7 A: No, I do not. These fees have been included in rates since 2020, and they should remain
8 included in rates. While Pittsburgh Water characterizes this as a rate mitigation tool, the potential
9 for mitigation is illusory. Customers are not saving \$500,000 per year if these fees are not included
10 in rates; instead, customers who pay by these means will be required to pay these fees directly. For
11 low income customers, this is a problematic shift in fees from all ratepayers to the household
12 directly. Given the difficulty for these households to afford to remain connected to service,
13 imposing a fee to pay their bill is particularly problematic. Customers should not have to pay a fee
14 to pay their bill.

15 **Q: Is there any data available about how often low income customers use electronic
16 means to pay their bills?**

17 A: Not from Pittsburgh Water. When asked in discovery to provide this information,
18 Pittsburgh Water states that it does not track this data point.²⁰⁹ However, there is national data
19 from the Federal Reserve that shows that low income households are far less likely to use ACH
20 transfers and credit cards than households at higher income levels. Based on data from the Federal
21 Reserve, lower income households use cash and debit cards far more often than other payment

²⁰⁶ Id.

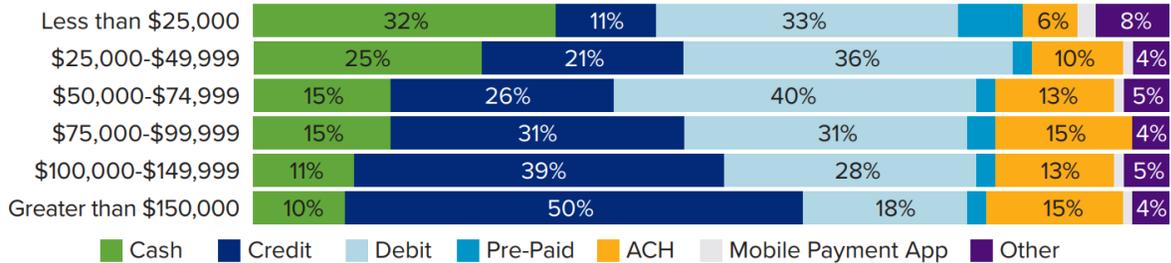
²⁰⁷ Pittsburgh Water St. 6 at 40.

²⁰⁸ Pittsburgh Water St. 4 at 26.

²⁰⁹ Pittsburgh Water response to OWT 3-14, attached hereto as Appendix B.

1 types – together these two payment types comprise 65% of the payment instrument used for
 2 households with income less than \$25,000.

3 **Table 23: Share of payment instrument use by household income.²¹⁰**



5 In conducting its study, the Federal Reserve found that approximately 20% of the share of
 6 households earning less than \$25,000 per year reported being unbanked.²¹¹

7 **Q: If low income households use credit cards for bill payment in general far less than**
 8 **other payment methods why are you concerned with removal of this fee?**

9 A: I am concerned because Pittsburgh Water treats debit and credit transactions as the same
 10 and, fundamentally, economically vulnerable customers should not have to pay a fee to pay their
 11 bill. While these households use credit cards less often, they still use them some of the time for
 12 payment and use debit cards frequently for payment based on the Federal Reserve data. Pittsburgh
 13 Water does not differentiate these payments in terms of the fee and imposes the same \$2.01 per
 14 transaction cost for credit or debit card payments.²¹²

15 **Q: What do you recommend about cash payments as authorized retailers?**

16 A: I recommend that Pittsburgh Water begin covering the cost of making cash payments at
 17 authorized retailers in rates rather than imposing them on customers. Low income customers are

²¹⁰ The Federal Reserve Financial Services, *2024 Findings from the Diary of Consumer Payment Choice* at 10, Figure 8, available at: <https://www.frbservices.org/news/research/2024-findings-from-the-diary-of-consumer-payment-choice>. (last visited August 22, 2025)

²¹¹ *Id.*

²¹² Pittsburgh Water response to OWT 3-24, attached hereto at Appendix B.

1 far more likely to pay their bills in case than any other customer segment and thus the imposition
2 of a fee to pay in cash imposes an undue burden on this group of customers – those who can least
3 afford to pay an additional fee. Pittsburgh Water should develop and implement a “pay with cash”
4 method that allows customers to present their bill, scan a bar code and pay their utility bill with
5 cash *without payment of a fee*. This is an increasingly common means of bill payment for low
6 income households and has been implemented by PGW for its customers.²¹³

7 **Q: Do you have any additional recommendations regarding bill payment methods?**

8 A: Yes, I recommend that Pittsburgh Water explore additional means of encouraging use of
9 other forms of payment from all households and accept payment using commonly used payment
10 applications like Venmo, CashApp, Zelle, PayPal and the like. These applications are increasingly
11 used for peer-to-peer payments and business transactions alike, including at retail establishments.
12 Specifically, I recommend that no later than its next rate case that Pittsburgh Water present a
13 proposal to accept payment by non-bank payment applications like those listed above without a
14 customer having to incur a fee.

15 **c. Bill Credit for Electronic Billing**

16 **Q: Has Pittsburgh Water proposed a new bill credit for households who opt in to**
17 **receiving an electronic bill?**

18 A: Yes. Pittsburgh Water is proposing a one-time bill credit of \$15 per account for customer
19 to enroll in paperless billing.²¹⁴ This credit will be applied to the customer’s first bill after
20 enrollment and “enrolled customers would also be prohibited from switching back to paper billing

²¹³ See PGW website: Ways to Pay, available at: <https://www.pgworks.com/customer-care/your-home/ways-to-pay>
(Last visited 08/26/2025).

²¹⁴ Pittsburgh Water St. 2 at 27.

1 for 6 months.”²¹⁵ The 6-month period generally represents the amount of time it would take for
2 the credit to pay for itself with savings from a mailed bill.²¹⁶

3 **Q: Do you support this bill credit?**

4 A: Yes, but I do not support the structure that prohibits a customer from returning to a mailed
5 paper bill for 6 months after enrollment. While Pittsburgh Water asserts that this six-month period
6 is meant to “stop customers from taking advantage of the credit who would otherwise prefer to
7 continue to receive paper bills,”²¹⁷ there are many valid reasons why a customer may opt-in to
8 electronic billing and then decide to return to paper billing and they should not be prohibited from
9 doing so.

10 I certainly understand that the incentive is meant to pay for itself through savings associated
11 with not mailing a bill to customers, and I understand why Pittsburgh Water seeks to incentivize
12 customers to remain on for 6 months or more. Thus, rather than prohibiting customers from
13 returning to a mailed bill, I recommend that Pittsburgh Water provide a bill credit of \$2.50 per
14 month for each month – up to 6 months – that a customer receives an electronic bill. This would
15 total the same dollar amount, provide an incentive to remain on electronic billing, but it is
16 preferable to a penalty structure the locks customers into electronic billing if they realize after they
17 sign up that they prefer mailed bills.

²¹⁵ *Id.* at 27:6-7.

²¹⁶ Pittsburgh Water asserts that the cost of a mailed bill is \$2.82 per month of approximately \$16.92 over six months. Pittsburgh Water St. 2 at 27:12.

²¹⁷ Pittsburgh Water St. 2 at 27:7-8.

1 **VIII. Damaged Wastewater Laterals**

2 **Q: Please describe the history of Pittsburgh Water’s damaged wastewater lateral**
3 **replacement program.**

4 A: This issue has been ongoing since Pittsburgh Water has come under the jurisdiction of the
5 Public Utility Commission. While Pittsburgh Water has taken steps over the years to seek to
6 implement a program,²¹⁸ it has not resulted in a successful program launch. For example, coming
7 out of its 2021 base rate case,²¹⁹ Pittsburgh Water committed in a settlement agreement to file a
8 separate petition for the repair and replacement of damaged wastewater laterals. It did so on March
9 18, 2022. However, the Commission rejected that petition by Order dated December 29, 2022.²²⁰
10 The Commission reasoned that Pittsburgh Water’s plan did not meet the requirements of Act 120
11 of 2018 or the Commission’s regulations.²²¹ The Commission order was without prejudice,
12 meaning that the Authority could have re-filed a plan that was compliant. The Authority has yet to
13 file such a plan, perhaps because in its 2023 rate case, Pittsburgh Water explained in testimony
14 that it was developing a comprehensive proposal that it planned to file with the Commission

²¹⁸ See Pittsburgh Water response to OWT 3-34(d), attached hereto at Appendix B.

²¹⁹ See Pa. Public Utility Commission v. Pittsburgh Water and Sewer Authority – Water, et al., Docket Nos. R-2021-3024773, R-2021-3024774, R-2021-3024779 (Order entered November 18, 2021) adopting the recommended decision of Administrative Law Judge Eranda Vero, dated October 6, 2021, which granted the Joint Petition for Settlement filed September 7, 2021, and adopted the Settlement, in full, without modification or correction.

²²⁰ Petition of Pittsburgh Water and Sewer Authority – Wastewater Division for Approval of Damaged Wastewater Sewer Lateral Program, Docket No. R-2022-3031586 and R- 2022-3031597 (Order entered December 29, 2022) (“2022 PWSA DWSL Order”).

²²¹ Specifically, the Commission reasoned that:

Accordingly, we find that PWSA-WD’s Petition does not meet the requirements of 52 Pa. Code § 66.33(b) because PWSA-WD’s DWSL Program is not specifically linked to PWSA-WD’s efforts to address excessive I&I causing, or which is reasonably expected to cause within the next 5 years, a hydraulically overloaded condition, wastewater overflows or additional flow which is prudent for the entity to avoid, or the design of construction conditions causing, or which are reasonably expected to cause with the next 5 years, wastewater overflows. 52 Pa. Code § 66.33(b).

1 seeking authority to implement a Pilot Infiltration and Inflow Reduction Program and Damaged
2 Wastewater Lateral Program for eligible low-income customers that presumably would be
3 complaint with the Commission’s 2022 PWSA DWSL Order.²²² Despite this more than two year
4 old commitment by the Authority, it has still not completed or filed a Pilot Infiltration and Inflow
5 Reduction and Damaged Wastewater Lateral Program petition.

6 **Q: What reasons does the Authority provide for not having filed this plan?**

7 A: Ms. Mechler states simply that the Authority has not filed this plan “largely due to the
8 ongoing Consent Decree negotiations and unavailable resources required for implementation.”²²³

9 When asked for clarification about this in discovery, the Authority responded: “With the unknown
10 requirements and costs of the Consent Decree, Pittsburgh Water cannot allocate resources to the
11 Damaged Wastewater Lateral Pilot Program at this time.”²²⁴

12 **Q: What are your concerns about Pittsburgh Water not having followed through with
13 the proposals that it has made in the last few rate cases?**

14 A: There are serious concerns about the health and safety of impacts of damaged wastewater
15 laterals not only for the households who face this significant expense associated with repairing
16 them but also to their neighbors and the service area. This not only affects the immediate customer
17 whose lateral is damaged, it impacts the integrity of the system. I am particularly concerned about
18 the Authority’s inaction because its current practice is to send a letter to customers with damaged
19 laterals that requires those customers to make the repairs within 30 days and then will begin issuing
20 fines to the property owner and pursue action at the local magistrates office.²²⁵ Low income

²²² See Pittsburgh Water response to OWT 3-34(d), attached hereto at Appendix B.

²²³ Pittsburgh Water St. 4 at 10:15-16.

²²⁴ Pittsburgh Water response to OWT 3-34(b), attached hereto at Appendix B.

²²⁵ Pittsburgh Water response to OWT 6-3 and 6-3, Attachment A, attached hereto at Appendix B. Note that Pittsburgh Water incorrectly labeled Attachment A to Pittsburgh Water response to OWT 6-3 as OWT 6-2A.

1 households simply do not have sufficient resources to make these repairs, the costs of which are
2 in the thousands or tens of thousands of dollars. I am deeply concerned that rather than proactively
3 plan for replacement of these laterals through the filing of a complaint plan, Pittsburgh Water has
4 taken a hands-off approach involving penalties and threats to customers who may be unable to
5 afford to make the repair.

6 I understand the Authority’s desire to have this project be a part of the outcomes and
7 certainty that will be in place once the consent decree is negotiated, but given that the Authority
8 has said that it has no idea when that will occur,²²⁶ it is OWT’s position that the Authority should
9 file a petition for a Damaged Sewer and Wastewater Lateral program that is fully compliant with
10 the Commission’s 2022 PWSA DWSL Order, Act 120, and Commission regulations within 90
11 days of the effective date of rates in this proceeding. While the consent decree may change some
12 of the scope of this, it seems farfetched to think that any outcome of those negotiations will not
13 involve remediation of infiltration and inflow resulting from damaged wastewater laterals.

14 **Q: The Authority has proposed a new partnership with an insurance company to sell and**
15 **provide insurance for damaged water and sewer lines in this proceeding.²²⁷ How does that**
16 **program interact with your recommendation?**

17 A: The water line and insurance lateral program just launched in July 2025, so it is unclear
18 how many households will sign up for this insurance, whether it is an affordable product as
19 compared to other options such as a homeowner’s insurance rider, and whether as claims begin to
20 materialize the insurance product will be sufficient and the provider will be responsive to those
21 claims in a timely manner. I am aware of significant concerns about the responsiveness of the
22 chosen insurance provider so time will tell whether this is a worthwhile product for Pittsburgh

²²⁶ See Pittsburgh Water response to OWT 3-34(a), attached hereto at Appendix B.

²²⁷ Pittsburgh Water St. 2 at 24-25.

1 Water’s customers.²²⁸ Regardless, the availability of this insurance product is immaterial for those
2 households who already have a damaged sewer lateral, as it is extremely likely that this would not
3 be a covered event under insurance. The availability of insurance is also immaterial to those who
4 cannot afford or choose not to purchase the product. Thus, I do not believe the availability of this
5 new insurance product resolves the outstanding issues related to damaged wastewater laterals and
6 the need for a comprehensive and structured Act 120 filing as noted above.

7 **IX. Medical Certificates/ Payment Arrangements**

8 **Q: Do you have concerns related to Pittsburgh Water’s medical certificate policies and**
9 **procedures which you would like to raise in the context of this testimony?**

10 A: Yes. Pittsburgh Water has a policy to negotiate payment arrangements for customers with
11 approved medical certificates that “apply the Commission’s regulations and an income
12 calculator.”²²⁹ While Pittsburgh Water indicates that it works with its customers to “establish an
13 equitable payment arrangement to address any outstanding balances and the grounds for
14 termination”,²³⁰ I am concerned that Pittsburgh Water’s stated process for issuing payment
15 arrangements for customers with medical certificates is not appropriately flexible to address
16 payment difficulties faced by medically-vulnerable customers.

17 Pittsburgh Water uses an income-based payment plan calculator for all payment
18 arrangements – including those established for medically vulnerable households who obtain a
19 medical certificate. This calculator is built into its Customer Information System (CIS), and

²²⁸ Pittsburgh Water is not including this product on its bills and not billing for this product. See Pittsburgh Water response to OWT 3-27(e), attached hereto at Appendix B. I support this decision as on-bill billing for non-commodity goods and services creates significant complications as well provides that false sense that this is a Pittsburgh Water product.

²²⁹ Pittsburgh Water response to OWT 4-7, attached hereto at Appendix B.

²³⁰ Pittsburgh Water response to OWT 4-2, Attachment at p. 8 of 15, attached hereto at Appendix B.

1 updated annually based on FPL guidelines.²³¹ Additional information provided by Pittsburgh
2 Water in response to discovery shows that Pittsburgh Water issues payment arrangements based
3 on certain formulaic inputs into its CIS, which follow rules for PUC payment arrangements,
4 including for determining the length of the agreement, and a limitation to two payment
5 arrangements through Pittsburgh Water with narrow exceptions.²³² Counsel for OWT has indicated
6 to me that it will address through briefing the legal analyses of whether Pittsburgh Water’s policies
7 and procedures related to issuing payment arrangements for customers with medical certificates
8 complies with the Commission’s regulations.

9 Putting legal analyses aside, I am concerned that the formulaic nature of the payment
10 arrangements being issued by Pittsburgh Water based on inputs into its CIS system does not
11 equitably address the arrearages for medically vulnerable households. To be equitable, payment
12 arrangements provided to customers with medical certificates must be flexible to account for the
13 acute payment issues that customers with underlying medical conditions in their household may
14 face. I am particularly concerned that customers with medical certificates may be deemed
15 ineligible for payment arrangements if they have more than one broken one payment arrangement.
16 From my experience, customers often obtain medical certificates when they are facing acute
17 medical conditions in their household and cannot afford to keep up with their monthly bills
18 alongside increased medical expenses. There is no indication in Pittsburgh Water’s training
19 materials that its CIS, or its customer service representatives, are instructed on how to consider

²³¹ Pittsburgh Water response to OWT 4-12, attached hereto at Appendix B.

²³² Pittsburgh Water response to OWT 3-17, Attachment; Pittsburgh Water response to OWT 6-4, attached hereto at Appendix B.

1 unique factors that may be faced by medically vulnerable households when issuing payment
2 arrangements.²³³

3 **Q: Do you have any recommendations related to Pittsburgh Water’s policies and**
4 **procedures related to payment arrangements for customers with medical certificates?**

5 A: Yes. I recommend that Pittsburgh Water revise its policies, procedures, and training
6 materials so that households with medical certificates can access more equitable payment
7 arrangement terms. I specifically recommend that customers who have medical certificates be
8 prioritized for outreach through the PGH2O Cares Team. I recommend that Pittsburgh Water
9 develop clear guidelines, which specifically allow more flexible payment arrangement standards
10 to protect these medically-vulnerable households. Specifically, Pittsburgh Water should follow the
11 factors outlined in the Commission’s regulations regarding disputes in section 56.151(3).

12 I also recommend that Pittsburgh Water be directed to develop policies and procedures which
13 allow households with medical certificates to access payment arrangements, even if they have
14 broken payment arrangements in the past. I similarly recommend that Pittsburgh Water be required
15 to update its training materials related to providing more flexible payment arrangements for
16 customers on medical certificates. These changes should be implemented no later than 6 months
17 from the effective date of rates in this proceeding.

18 **X. Conclusion**

19 **Q: Does this conclude your direct testimony?**

20 A: Yes.

²³³ See Pittsburgh Water OWT 3-17, Attachment, attached hereto at Appendix B.

Pittsburgh United OWT Statement 1, Cicero

Exhibit 1, Burden Tables

Pittsburgh UNITED Our Water Table Exhibit 1-a
Water/Wastewater/Stormwater Burden Tables
Current Full Tarriff vs. Current BPD

2 Person Household							
	Income	PWSA Monthly (\$) CURRENT	PWSA Annual (\$) CURRENT	Burden (%) CURRENT	PWSA Monthly (\$) BDP CURRENT	PWSA Annual (\$) BDP CURRENT	Burden (%) PWSA BDP CURRENT
1000 Gal.							
50% FPL	\$ 10,575	\$ 72.61	\$ 871.32	8.24%	\$ 21.85	\$ 262.20	2.48%
100% FPL	\$ 21,150	\$ 72.61	\$ 871.32	4.12%	\$ 21.85	\$ 262.20	1.24%
150% FPL	\$ 31,725	\$ 72.61	\$ 871.32	2.75%	\$ 21.85	\$ 262.20	0.83%
200% FPL	\$ 42,300	\$ 72.61	\$ 871.32	2.06%	\$ 21.85	\$ 262.20	0.62%
3000 Gal							
50% FPL	\$ 10,575	\$ 144.88	\$ 1,738.56	16.44%	\$ 65.06	\$ 780.72	7.38%
100% FPL	\$ 21,150	\$ 144.88	\$ 1,738.56	8.22%	\$ 94.12	\$ 1,129.44	5.34%
150% FPL	\$ 31,725	\$ 144.88	\$ 1,738.56	5.48%	\$ 94.12	\$ 1,129.44	3.56%
200% FPL	\$ 42,300	\$ 144.88	\$ 1,738.56	4.11%	\$ 94.12	\$ 1,129.44	2.67%
6000 Gal							
50% FPL	\$ 10,575	\$ 253.28	\$ 3,039.36	28.74%	\$ 129.88	\$ 1,558.56	14.74%
100% FPL	\$ 21,150	\$ 253.28	\$ 3,039.36	14.37%	\$ 202.52	\$ 2,430.24	11.49%
150% FPL	\$ 31,725	\$ 253.28	\$ 3,039.36	9.58%	\$ 202.52	\$ 2,430.24	7.66%
200% FPL	\$ 42,300	\$ 253.28	\$ 3,039.36	7.19%	\$ 202.52	\$ 2,430.24	5.75%
8000 Gal							
50% FPL	\$ 10,575	\$ 324.49	\$ 3,893.88	36.82%	\$ 173.09	\$ 2,077.08	19.64%
100% FPL	\$ 21,150	\$ 324.49	\$ 3,893.88	18.41%	\$ 274.79	\$ 3,297.48	15.59%
150% FPL	\$ 31,725	\$ 324.49	\$ 3,893.88	12.27%	\$ 274.79	\$ 3,297.48	10.39%
200% FPL	\$ 42,300	\$ 324.49	\$ 3,893.88	9.21%	\$ 279.79	\$ 3,357.48	7.94%

3 Person Household							
	Income	PWSA Monthly (\$) CURRENT	PWSA Annual (\$) CURRENT	Burden (%) CURRENT	PWSA Monthly (\$) BDP CURRENT	PWSA Annual (\$) BDP CURRENT	Burden (%) PWSA BDP CURRENT
1000 Gal.							
50% FPL	\$ 13,325	\$ 72.61	\$ 871.32	6.54%	\$ 21.85	\$ 262.20	1.97%
100% FPL	\$ 26,650	\$ 72.61	\$ 871.32	3.27%	\$ 21.85	\$ 262.20	0.98%
150% FPL	\$ 39,975	\$ 72.61	\$ 871.32	2.18%	\$ 21.85	\$ 262.20	0.66%
200% FPL	\$ 53,300	\$ 72.61	\$ 871.32	1.63%	\$ 21.85	\$ 262.20	0.49%
3000 Gal							
50% FPL	\$ 13,325	\$ 144.88	\$ 1,738.56	13.05%	\$ 65.06	\$ 780.72	5.86%
100% FPL	\$ 26,650	\$ 144.88	\$ 1,738.56	6.52%	\$ 94.12	\$ 1,129.44	4.24%
150% FPL	\$ 39,975	\$ 144.88	\$ 1,738.56	4.35%	\$ 94.12	\$ 1,129.44	2.83%
200% FPL	\$ 53,300	\$ 144.88	\$ 1,738.56	3.26%	\$ 94.12	\$ 1,129.44	2.12%
6000 Gal							
50% FPL	\$ 13,325	\$ 253.28	\$ 3,039.36	22.81%	\$ 129.88	\$ 1,558.56	11.70%
100% FPL	\$ 26,650	\$ 253.28	\$ 3,039.36	11.40%	\$ 202.52	\$ 2,430.24	9.12%
150% FPL	\$ 39,975	\$ 253.28	\$ 3,039.36	7.60%	\$ 202.52	\$ 2,430.24	6.08%
200% FPL	\$ 53,300	\$ 253.28	\$ 3,039.36	5.70%	\$ 202.52	\$ 2,430.24	4.56%
8000 Gal							
50% FPL	\$ 13,325	\$ 324.49	\$ 3,893.88	29.22%	\$ 173.09	\$ 2,077.08	15.59%
100% FPL	\$ 26,650	\$ 324.49	\$ 3,893.88	14.61%	\$ 274.79	\$ 3,297.48	12.37%
150% FPL	\$ 39,975	\$ 324.49	\$ 3,893.88	9.74%	\$ 274.79	\$ 3,297.48	8.25%
200% FPL	\$ 53,300	\$ 324.49	\$ 3,893.88	7.31%	\$ 279.79	\$ 3,357.48	6.30%

4 Person Household							
	Income	PWSA Monthly (\$) CURRENT	PWSA Annual (\$) CURRENT	Burden (%) CURRENT	PWSA Monthly (\$) BDP CURRENT	PWSA Annual (\$) BDP CURRENT	Burden (%) PWSA BDP CURRENT
1000 Gal.							
50% FPL	\$ 16,075	\$ 72.61	\$ 871.32	5.42%	\$ 21.85	\$ 262.20	1.63%
100% FPL	\$ 32,150	\$ 72.61	\$ 871.32	2.71%	\$ 21.85	\$ 262.20	0.82%
150% FPL	\$ 48,225	\$ 72.61	\$ 871.32	1.81%	\$ 21.85	\$ 262.20	0.54%
200% FPL	\$ 64,300	\$ 72.61	\$ 871.32	1.36%	\$ 21.85	\$ 262.20	0.41%
3000 Gal							
50% FPL	\$ 16,075	\$ 144.88	\$ 1,738.56	10.82%	\$ 65.06	\$ 780.72	4.86%
100% FPL	\$ 32,150	\$ 144.88	\$ 1,738.56	5.41%	\$ 94.12	\$ 1,129.44	3.51%
150% FPL	\$ 48,225	\$ 144.88	\$ 1,738.56	3.61%	\$ 94.12	\$ 1,129.44	2.34%
200% FPL	\$ 64,300	\$ 144.88	\$ 1,738.56	2.70%	\$ 94.12	\$ 1,129.44	1.76%
6000 Gal							
50% FPL	\$ 16,075	\$ 253.28	\$ 3,039.36	18.91%	\$ 129.88	\$ 1,558.56	9.70%
100% FPL	\$ 32,150	\$ 253.28	\$ 3,039.36	9.45%	\$ 202.52	\$ 2,430.24	7.56%
150% FPL	\$ 48,225	\$ 253.28	\$ 3,039.36	6.30%	\$ 202.52	\$ 2,430.24	5.04%
200% FPL	\$ 64,300	\$ 253.28	\$ 3,039.36	4.73%	\$ 202.52	\$ 2,430.24	3.78%
8000 Gal							
50% FPL	\$ 16,075	\$ 324.49	\$ 3,893.88	24.22%	\$ 173.09	\$ 2,077.08	12.92%
100% FPL	\$ 32,150	\$ 324.49	\$ 3,893.88	12.11%	\$ 274.79	\$ 3,297.48	10.26%
150% FPL	\$ 48,225	\$ 324.49	\$ 3,893.88	8.07%	\$ 274.79	\$ 3,297.48	6.84%
200% FPL	\$ 64,300	\$ 324.49	\$ 3,893.88	6.06%	\$ 279.79	\$ 3,357.48	5.22%

*Rates Include Tier 2 Stormwater Fee, PennVest Charge, DSIC, and full tariff 2025 Alcosan charges

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2025 federal poverty guidelines.

See HHS Poverty Guidelines for 2025, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Pittsburgh UNITED Our Water Table Exhibit 1-b
Water/Wastewater/Stormwater Burden Tables
Proposed Full Tariff 2026 vs. Proposed BDP 2026

2 Person Household							
	Annual Income	PWSA Monthly (\$) 2026	PWSA Annual (\$) 2026	Burden (%) PWSA 2026	PWSA Monthly (\$) BDP 2026	PWSA Annual (\$) BDP 2026	Burden (%) PWSA BDP 2026
1000 Gal.							
50% FPL	\$ 10,575	\$ 82.68	\$ 992.16	9.38%	\$ 23.88	\$ 286.56	2.71%
100% FPL	\$ 21,150	\$ 82.68	\$ 992.16	4.69%	\$ 16.44	\$ 197.28	0.93%
150% FPL	\$ 31,725	\$ 82.68	\$ 992.16	3.13%	\$ 16.44	\$ 197.28	0.62%
200% FPL	\$ 42,300	\$ 82.68	\$ 992.16	2.35%	\$ 16.44	\$ 197.28	0.47%
3000 Gal							
50% FPL	\$ 10,575	\$ 171.28	\$ 2,055.36	19.44%	\$ 73.43	\$ 881.16	8.33%
100% FPL	\$ 21,150	\$ 171.28	\$ 2,055.36	9.72%	\$ 101.18	\$ 1,214.16	5.74%
150% FPL	\$ 31,725	\$ 171.28	\$ 2,055.36	6.48%	\$ 101.18	\$ 1,214.16	3.83%
200% FPL	\$ 42,300	\$ 171.28	\$ 2,055.36	4.86%	\$ 101.18	\$ 1,214.16	2.87%
6000 Gal							
50% FPL	\$ 10,575	\$ 304.18	\$ 3,650.16	34.52%	\$ 149.85	\$ 1,798.20	17.00%
100% FPL	\$ 21,150	\$ 304.18	\$ 3,650.16	17.26%	\$ 229.22	\$ 2,750.64	13.01%
150% FPL	\$ 31,725	\$ 304.18	\$ 3,650.16	11.51%	\$ 229.22	\$ 2,750.64	8.67%
200% FPL	\$ 42,300	\$ 304.18	\$ 3,650.16	8.63%	\$ 229.22	\$ 2,750.64	6.50%
8000 Gal							
50% FPL	\$ 10,575	\$ 392.78	\$ 4,713.36	44.57%	\$ 200.24	\$ 2,402.88	22.72%
100% FPL	\$ 21,150	\$ 392.78	\$ 4,713.36	22.29%	\$ 314.58	\$ 3,774.96	17.85%
150% FPL	\$ 31,725	\$ 392.78	\$ 4,713.36	14.86%	\$ 314.58	\$ 3,774.96	11.90%
200% FPL	\$ 42,300	\$ 392.78	\$ 4,713.36	11.14%	\$ 314.58	\$ 3,774.96	8.92%

3 Person Household							
	Annual Income	PWSA Monthly (\$) 2026	PWSA Annual (\$) 2026	Burden (%) PWSA 2026	PWSA Monthly (\$) BDP 2026	PWSA Annual (\$) BDP 2026	Burden (%) PWSA BDP 2026
1000 Gal.							
50% FPL	\$ 13,325	\$ 82.68	\$ 992.16	7.45%	\$ 23.88	\$ 286.56	2.15%
100% FPL	\$ 26,650	\$ 82.68	\$ 992.16	3.72%	\$ 16.44	\$ 197.28	0.74%
150% FPL	\$ 39,975	\$ 82.68	\$ 992.16	2.48%	\$ 16.44	\$ 197.28	0.49%
200% FPL	\$ 53,300	\$ 82.68	\$ 992.16	1.86%	\$ 16.44	\$ 197.28	0.37%
3000 Gal							
50% FPL	\$ 13,325	\$ 171.28	\$ 2,055.36	15.42%	\$ 73.43	\$ 881.16	6.61%
100% FPL	\$ 26,650	\$ 171.28	\$ 2,055.36	7.71%	\$ 101.18	\$ 1,214.16	4.56%
150% FPL	\$ 39,975	\$ 171.28	\$ 2,055.36	5.14%	\$ 101.18	\$ 1,214.16	3.04%
200% FPL	\$ 53,300	\$ 171.28	\$ 2,055.36	3.86%	\$ 101.18	\$ 1,214.16	2.28%
6000 Gal							
50% FPL	\$ 13,325	\$ 304.18	\$ 3,650.16	27.39%	\$ 149.85	\$ 1,798.20	13.49%
100% FPL	\$ 26,650	\$ 304.18	\$ 3,650.16	13.70%	\$ 229.22	\$ 2,750.64	10.32%
150% FPL	\$ 39,975	\$ 304.18	\$ 3,650.16	9.13%	\$ 229.22	\$ 2,750.64	6.88%
200% FPL	\$ 53,300	\$ 304.18	\$ 3,650.16	6.85%	\$ 229.22	\$ 2,750.64	5.16%
8000 Gal							
50% FPL	\$ 13,325	\$ 392.78	\$ 4,713.36	35.37%	\$ 200.24	\$ 2,402.88	18.03%
100% FPL	\$ 26,650	\$ 392.78	\$ 4,713.36	17.69%	\$ 314.58	\$ 3,774.96	14.16%
150% FPL	\$ 39,975	\$ 392.78	\$ 4,713.36	11.79%	\$ 314.58	\$ 3,774.96	9.44%
200% FPL	\$ 53,300	\$ 392.78	\$ 4,713.36	8.84%	\$ 314.58	\$ 3,774.96	7.08%

4 Person Household							
	Annual Income	PWSA Monthly (\$) 2026	PWSA Annual (\$) 2026	Burden (%) PWSA 2026	PWSA Monthly (\$) BDP 2026	PWSA Annual (\$) BDP 2026	Burden (%) PWSA BDP 2026
1000 Gal.							
50% FPL	\$ 16,075	\$ 82.68	\$ 992.16	6.17%	\$ 23.88	\$ 286.56	1.78%
100% FPL	\$ 32,150	\$ 82.68	\$ 992.16	3.09%	\$ 16.44	\$ 197.28	0.61%
150% FPL	\$ 48,225	\$ 82.68	\$ 992.16	2.06%	\$ 16.44	\$ 197.28	0.41%
200% FPL	\$ 64,300	\$ 82.68	\$ 992.16	1.54%	\$ 16.44	\$ 197.28	0.31%
3000 Gal							
50% FPL	\$ 16,075	\$ 171.28	\$ 2,055.36	12.79%	\$ 73.43	\$ 881.16	5.48%
100% FPL	\$ 32,150	\$ 171.28	\$ 2,055.36	6.39%	\$ 101.18	\$ 1,214.16	3.78%
150% FPL	\$ 48,225	\$ 171.28	\$ 2,055.36	4.26%	\$ 101.18	\$ 1,214.16	2.52%
200% FPL	\$ 64,300	\$ 171.28	\$ 2,055.36	3.20%	\$ 101.18	\$ 1,214.16	1.89%
6000 Gal							
50% FPL	\$ 16,075	\$ 304.18	\$ 3,650.16	22.71%	\$ 149.85	\$ 1,798.20	11.19%
100% FPL	\$ 32,150	\$ 304.18	\$ 3,650.16	11.35%	\$ 229.22	\$ 2,750.64	8.56%
150% FPL	\$ 48,225	\$ 304.18	\$ 3,650.16	7.57%	\$ 229.22	\$ 2,750.64	5.70%
200% FPL	\$ 64,300	\$ 304.18	\$ 3,650.16	5.68%	\$ 229.22	\$ 2,750.64	4.28%
8000 Gal							
50% FPL	\$ 16,075	\$ 392.78	\$ 4,713.36	29.32%	\$ 200.24	\$ 2,402.88	14.95%
100% FPL	\$ 32,150	\$ 392.78	\$ 4,713.36	14.66%	\$ 314.58	\$ 3,774.96	11.74%
150% FPL	\$ 48,225	\$ 392.78	\$ 4,713.36	9.77%	\$ 314.58	\$ 3,774.96	7.83%
200% FPL	\$ 64,300	\$ 392.78	\$ 4,713.36	7.33%	\$ 314.58	\$ 3,774.96	5.87%

*Proposed Rates Include Tier 2 Stormwater Fee, PENNVest Charge, DSIC, and full tariff 2025 Alcosan charges

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2025 federal poverty guidelines.

See HHS Poverty Guidelines for 2025, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Pittsburgh UNITED Our Water Table Exhibit 1-c
Water/Wastewater/Stormwater Burden Tables
Proposed Full Tariff 2027 vs. Proposed BDP 2027

2 Person Household							
	Annual Income	PWSA Monthly (\$) 2027	PWSA Annual (\$) 2027	Burden (%) PWSA 2027	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027
1000 Gal.							
50% FPL	\$ 10,575	\$ 91.01	\$ 1,092.12	10.33%	\$ 23.52	\$ 282.24	2.67%
100% FPL	\$ 21,150	\$ 91.01	\$ 1,092.12	5.16%	\$ 19.13	\$ 229.56	1.09%
150% FPL	\$ 31,725	\$ 91.01	\$ 1,092.12	3.44%	\$ 19.13	\$ 229.56	0.72%
200% FPL	\$ 42,300	\$ 91.01	\$ 1,092.12	2.58%	\$ 19.13	\$ 229.56	0.54%
3000 Gal.							
50% FPL	\$ 10,575	\$ 180.16	\$ 2,161.92	20.44%	\$ 74.12	\$ 889.44	8.41%
100% FPL	\$ 21,150	\$ 180.16	\$ 2,161.92	10.22%	\$ 104.86	\$ 1,258.32	5.95%
150% FPL	\$ 31,725	\$ 180.16	\$ 2,161.92	6.81%	\$ 104.86	\$ 1,258.32	3.97%
200% FPL	\$ 42,300	\$ 180.16	\$ 2,161.92	5.11%	\$ 104.86	\$ 1,258.32	2.97%
6000 Gal.							
50% FPL	\$ 10,575	\$ 313.90	\$ 3,766.80	35.62%	\$ 150.05	\$ 1,800.60	17.03%
100% FPL	\$ 21,150	\$ 313.90	\$ 3,766.80	17.81%	\$ 233.75	\$ 2,805.00	13.26%
150% FPL	\$ 31,725	\$ 313.90	\$ 3,766.80	11.87%	\$ 233.75	\$ 2,805.00	8.84%
200% FPL	\$ 42,300	\$ 313.90	\$ 3,766.80	8.90%	\$ 233.75	\$ 2,805.00	6.63%
8000 Gal.							
50% FPL	\$ 10,575	\$ 403.05	\$ 4,836.60	45.74%	\$ 200.66	\$ 2,407.92	22.77%
100% FPL	\$ 21,150	\$ 403.05	\$ 4,836.60	22.87%	\$ 319.67	\$ 3,836.04	18.14%
150% FPL	\$ 31,725	\$ 403.05	\$ 4,836.60	15.25%	\$ 319.67	\$ 3,836.04	12.09%
200% FPL	\$ 42,300	\$ 403.05	\$ 4,836.60	11.43%	\$ 319.67	\$ 3,836.04	9.07%

3 Person Household							
	Annual Income	PWSA Monthly (\$) 2027	PWSA Annual (\$) 2027	Burden (%) PWSA 2027	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027
1000 Gal.							
50% FPL	\$ 13,325	\$ 91.01	\$ 1,092.12	8.20%	\$ 23.52	\$ 282.24	2.12%
100% FPL	\$ 26,650	\$ 91.01	\$ 1,092.12	4.10%	\$ 19.13	\$ 229.56	0.86%
150% FPL	\$ 39,975	\$ 91.01	\$ 1,092.12	2.73%	\$ 19.13	\$ 229.56	0.57%
200% FPL	\$ 53,300	\$ 91.01	\$ 1,092.12	2.05%	\$ 19.13	\$ 229.56	0.43%
3000 Gal.							
50% FPL	\$ 13,325	\$ 180.16	\$ 2,161.92	16.2%	\$ 74.12	\$ 889.44	6.67%
100% FPL	\$ 26,650	\$ 180.16	\$ 2,161.92	8.1%	\$ 104.86	\$ 1,258.32	4.72%
150% FPL	\$ 39,975	\$ 180.16	\$ 2,161.92	5.4%	\$ 104.86	\$ 1,258.32	3.15%
200% FPL	\$ 53,300	\$ 180.16	\$ 2,161.92	4.1%	\$ 104.86	\$ 1,258.32	2.36%
6000 Gal.							
50% FPL	\$ 13,325	\$ 313.90	\$ 3,766.80	28.27%	\$ 150.05	\$ 1,800.60	13.51%
100% FPL	\$ 26,650	\$ 313.90	\$ 3,766.80	14.13%	\$ 233.75	\$ 2,805.00	10.53%
150% FPL	\$ 39,975	\$ 313.90	\$ 3,766.80	9.42%	\$ 233.75	\$ 2,805.00	7.02%
200% FPL	\$ 53,300	\$ 313.90	\$ 3,766.80	7.07%	\$ 233.75	\$ 2,805.00	5.26%
8000 Gal.							
50% FPL	\$ 13,325	\$ 403.05	\$ 4,836.60	36.30%	\$ 200.66	\$ 2,407.92	18.07%
100% FPL	\$ 26,650	\$ 403.05	\$ 4,836.60	18.15%	\$ 319.67	\$ 3,836.04	14.39%
150% FPL	\$ 39,975	\$ 403.05	\$ 4,836.60	12.10%	\$ 319.67	\$ 3,836.04	9.60%
200% FPL	\$ 53,300	\$ 403.05	\$ 4,836.60	9.07%	\$ 319.67	\$ 3,836.04	7.20%

4 Person Household							
	Annual Income	PWSA Monthly (\$) 2027	PWSA Annual (\$) 2027	Burden (%) PWSA 2027	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027
1000 Gal.							
50% FPL	\$ 16,075	\$ 91.01	\$ 1,092.12	6.79%	\$ 23.52	\$ 282.24	1.76%
100% FPL	\$ 32,150	\$ 91.01	\$ 1,092.12	3.40%	\$ 19.13	\$ 229.56	0.71%
150% FPL	\$ 48,225	\$ 91.01	\$ 1,092.12	2.26%	\$ 19.13	\$ 229.56	0.48%
200% FPL	\$ 64,300	\$ 91.01	\$ 1,092.12	1.70%	\$ 19.13	\$ 229.56	0.36%
3000 Gal							
50% FPL	\$ 16,075	\$ 180.16	\$ 2,161.92	13.45%	\$ 74.12	\$ 889.44	5.53%
100% FPL	\$ 32,150	\$ 180.16	\$ 2,161.92	6.72%	\$ 104.86	\$ 1,258.32	3.91%
150% FPL	\$ 48,225	\$ 180.16	\$ 2,161.92	4.48%	\$ 104.86	\$ 1,258.32	2.61%
200% FPL	\$ 64,300	\$ 180.16	\$ 2,161.92	3.36%	\$ 104.86	\$ 1,258.32	1.96%
6000 Gal							
50% FPL	\$ 16,075	\$ 313.90	\$ 3,766.80	23.43%	\$ 150.05	\$ 1,800.60	11.20%
100% FPL	\$ 32,150	\$ 313.90	\$ 3,766.80	11.72%	\$ 233.75	\$ 2,805.00	8.72%
150% FPL	\$ 48,225	\$ 313.90	\$ 3,766.80	7.81%	\$ 233.75	\$ 2,805.00	5.82%
200% FPL	\$ 64,300	\$ 313.90	\$ 3,766.80	5.86%	\$ 233.75	\$ 2,805.00	4.36%
8000 Gal							
50% FPL	\$ 16,075	\$ 403.05	\$ 4,836.60	30.09%	\$ 200.66	\$ 2,407.92	14.98%
100% FPL	\$ 32,150	\$ 403.05	\$ 4,836.60	15.04%	\$ 319.67	\$ 3,836.04	11.93%
150% FPL	\$ 48,225	\$ 403.05	\$ 4,836.60	10.03%	\$ 319.67	\$ 3,836.04	7.95%
200% FPL	\$ 64,300	\$ 403.05	\$ 4,836.60	7.52%	\$ 319.67	\$ 3,836.04	5.97%

*Proposed Rates Include Tier 2 Stormwater Fee, PENNVest Charge, DSIC, and full tariff 2025 Alcosan charges

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2025 federal poverty guidelines.

See HHS Poverty Guidelines for 2025, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Pittsburgh UNITED Our Water Table Exhibit 1-d
Water/Wastewater/Stormwater Burden Tables
Proposed PWSA BDP 2027 vs. OWT BDP

2 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 10,575	\$ 23.52	\$ 282.24	2.67%	\$ 13.82	\$ 165.84	1.57%
100% FPL	\$ 21,150	\$ 19.13	\$ 229.56	1.09%	\$ 23.52	\$ 282.24	1.33%
150% FPL	\$ 31,725	\$ 19.13	\$ 229.56	0.72%	\$ 19.13	\$ 229.56	0.72%
200% FPL	\$ 42,300	\$ 19.13	\$ 229.56	0.54%	\$ 19.13	\$ 229.56	0.54%
3000 Gal.							
50% FPL	\$ 10,575	\$ 74.12	\$ 889.44	8.41%	\$ 58.72	\$ 704.64	6.66%
100% FPL	\$ 21,150	\$ 104.86	\$ 1,258.32	5.95%	\$ 74.12	\$ 889.44	4.21%
150% FPL	\$ 31,725	\$ 104.86	\$ 1,258.32	3.97%	\$ 104.86	\$ 1,258.32	3.97%
200% FPL	\$ 42,300	\$ 104.86	\$ 1,258.32	2.97%	\$ 104.86	\$ 1,258.32	2.97%
6000 Gal.							
50% FPL	\$ 10,575	\$ 150.05	\$ 1,800.60	17.03%	\$ 129.78	\$ 1,557.36	14.73%
100% FPL	\$ 21,150	\$ 233.75	\$ 2,805.00	13.26%	\$ 150.05	\$ 1,800.60	8.51%
150% FPL	\$ 31,725	\$ 233.75	\$ 2,805.00	8.84%	\$ 233.75	\$ 2,805.00	8.84%
200% FPL	\$ 42,300	\$ 233.75	\$ 2,805.00	6.63%	\$ 233.75	\$ 2,805.00	6.63%
8000 Gal.							
50% FPL	\$ 10,575	\$ 200.66	\$ 2,407.92	22.77%	\$ 177.16	\$ 2,125.92	20.10%
100% FPL	\$ 21,150	\$ 319.67	\$ 3,836.04	18.14%	\$ 200.66	\$ 2,407.92	11.38%
150% FPL	\$ 31,725	\$ 319.67	\$ 3,836.04	12.09%	\$ 319.67	\$ 3,836.04	12.09%
200% FPL	\$ 42,300	\$ 319.67	\$ 3,836.04	9.07%	\$ 319.67	\$ 3,836.04	9.07%

3 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 13,325	\$ 23.52	\$ 282.24	2.12%	\$ 13.82	\$ 165.84	1.24%
100% FPL	\$ 26,650	\$ 19.13	\$ 229.56	0.86%	\$ 23.52	\$ 282.24	1.06%
150% FPL	\$ 39,975	\$ 19.13	\$ 229.56	0.57%	\$ 19.13	\$ 229.56	0.57%
200% FPL	\$ 53,300	\$ 19.13	\$ 229.56	0.43%	\$ 19.13	\$ 229.56	0.43%
3000 Gal.							
50% FPL	\$ 13,325	\$ 74.12	\$ 889.44	6.67%	\$ 58.72	\$ 704.64	5.29%
100% FPL	\$ 26,650	\$ 104.86	\$ 1,258.32	4.72%	\$ 74.12	\$ 889.44	3.34%
150% FPL	\$ 39,975	\$ 104.86	\$ 1,258.32	3.15%	\$ 104.86	\$ 1,258.32	3.15%
200% FPL	\$ 53,300	\$ 104.86	\$ 1,258.32	2.36%	\$ 104.86	\$ 1,258.32	2.36%
6000 Gal.							
50% FPL	\$ 13,325	\$ 150.05	\$ 1,800.60	13.51%	\$ 129.78	\$ 1,557.36	11.69%
100% FPL	\$ 26,650	\$ 233.75	\$ 2,805.00	10.53%	\$ 150.05	\$ 1,800.60	6.76%
150% FPL	\$ 39,975	\$ 233.75	\$ 2,805.00	7.02%	\$ 233.75	\$ 2,805.00	7.02%
200% FPL	\$ 53,300	\$ 233.75	\$ 2,805.00	5.26%	\$ 233.75	\$ 2,805.00	5.26%
8000 Gal.							
50% FPL	\$ 13,325	\$ 200.66	\$ 2,407.92	18.07%	\$ 177.16	\$ 2,125.92	15.95%
100% FPL	\$ 26,650	\$ 319.67	\$ 3,836.04	14.39%	\$ 200.66	\$ 2,407.92	9.04%
150% FPL	\$ 39,975	\$ 319.67	\$ 3,836.04	9.60%	\$ 319.67	\$ 3,836.04	9.60%
200% FPL	\$ 53,300	\$ 319.67	\$ 3,836.04	7.20%	\$ 319.67	\$ 3,836.04	7.20%

4 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 16,075	\$ 23.52	\$ 282.24	1.76%	\$ 13.82	\$ 165.84	1.03%
100% FPL	\$ 32,150	\$ 19.13	\$ 229.56	0.71%	\$ 23.52	\$ 282.24	0.88%
150% FPL	\$ 48,225	\$ 19.13	\$ 229.56	0.48%	\$ 19.13	\$ 229.56	0.48%
200% FPL	\$ 64,300	\$ 19.13	\$ 229.56	0.36%	\$ 19.13	\$ 229.56	0.36%
3000 Gal							
50% FPL	\$ 16,075	\$ 74.12	\$ 889.44	5.53%	\$ 58.72	\$ 704.64	4.38%
100% FPL	\$ 32,150	\$ 104.86	\$ 1,258.32	3.91%	\$ 74.12	\$ 889.44	2.77%
150% FPL	\$ 48,225	\$ 104.86	\$ 1,258.32	2.61%	\$ 104.86	\$ 1,258.32	2.61%
200% FPL	\$ 64,300	\$ 104.86	\$ 1,258.32	1.96%	\$ 104.86	\$ 1,258.32	1.96%
6000 Gal							
50% FPL	\$ 16,075	\$ 150.05	\$ 1,800.60	11.20%	\$ 129.78	\$ 1,557.36	9.69%
100% FPL	\$ 32,150	\$ 233.75	\$ 2,805.00	8.72%	\$ 150.05	\$ 1,800.60	5.60%
150% FPL	\$ 48,225	\$ 233.75	\$ 2,805.00	5.82%	\$ 233.75	\$ 2,805.00	5.82%
200% FPL	\$ 64,300	\$ 233.75	\$ 2,805.00	4.36%	\$ 233.75	\$ 2,805.00	4.36%
8000 Gal							
50% FPL	\$ 16,075	\$ 200.66	\$ 2,407.92	14.98%	\$ 177.16	\$ 2,125.92	13.23%
100% FPL	\$ 32,150	\$ 319.67	\$ 3,836.04	11.93%	\$ 200.66	\$ 2,407.92	7.49%
150% FPL	\$ 48,225	\$ 319.67	\$ 3,836.04	7.95%	\$ 319.67	\$ 3,836.04	7.95%
200% FPL	\$ 64,300	\$ 319.67	\$ 3,836.04	5.97%	\$ 319.67	\$ 3,836.04	5.97%

*Proposed Rates Include Tier 2 Stormwater Fee, PENNVest Charge, DSIC, and full tariff Alcosan charges

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2025 federal poverty guidelines.

See HHS Poverty Guidelines for 2025, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Pittsburgh UNITED Our Water Table Exhibit 1-e
Water/Wastewater/Stormwater Burden Tables
Proposed PWSA BDP 2027 vs. OWT BDP (with Alcosan Discount)

2 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 10,575	\$ 6.85	\$ 82.20	0.78%	\$ (2.85)	\$ (34.20)	-0.32%
100% FPL	\$ 21,150	\$ 2.46	\$ 29.52	0.14%	\$ 6.85	\$ 82.20	0.39%
150% FPL	\$ 31,725	\$ 2.46	\$ 29.52	0.09%	\$ 2.55	\$ 30.60	0.10%
200% FPL	\$ 42,300	\$ 2.46	\$ 29.52	0.07%	\$ 2.55	\$ 30.60	0.07%
3000 Gal.							
50% FPL	\$ 10,575	\$ 57.45	\$ 689.40	6.52%	\$ 42.05	\$ 504.60	4.77%
100% FPL	\$ 21,150	\$ 88.19	\$ 1,058.28	5.00%	\$ 54.23	\$ 650.76	3.08%
150% FPL	\$ 31,725	\$ 88.19	\$ 1,058.28	3.34%	\$ 84.96	\$ 1,019.52	3.21%
200% FPL	\$ 42,300	\$ 88.19	\$ 1,058.28	2.50%	\$ 84.96	\$ 1,019.52	2.41%
6000 Gal.							
50% FPL	\$ 10,575	\$ 133.38	\$ 1,600.56	15.14%	\$ 113.11	\$ 1,357.32	12.84%
100% FPL	\$ 21,150	\$ 217.08	\$ 2,604.96	12.32%	\$ 133.42	\$ 1,601.04	7.57%
150% FPL	\$ 31,725	\$ 217.08	\$ 2,604.96	8.21%	\$ 216.17	\$ 2,594.04	8.18%
200% FPL	\$ 42,300	\$ 217.08	\$ 2,604.96	6.16%	\$ 216.17	\$ 2,594.04	6.13%
8000 Gal.							
50% FPL	\$ 10,575	\$ 183.99	\$ 2,207.88	20.88%	\$ 160.49	\$ 1,925.88	18.21%
100% FPL	\$ 21,150	\$ 303.00	\$ 3,636.00	17.19%	\$ 183.99	\$ 2,207.88	10.44%
150% FPL	\$ 31,725	\$ 303.00	\$ 3,636.00	11.46%	\$ 309.46	\$ 3,713.52	11.71%
200% FPL	\$ 42,300	\$ 303.00	\$ 3,636.00	8.60%	\$ 309.46	\$ 3,713.52	8.78%

3 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 13,325	\$ 6.85	\$ 82.20	0.62%	\$ (2.85)	\$ (34.20)	-0.26%
100% FPL	\$ 26,650	\$ 2.46	\$ 29.52	0.11%	\$ 6.85	\$ 82.20	0.31%
150% FPL	\$ 39,975	\$ 2.46	\$ 29.52	0.07%	\$ 2.55	\$ 30.60	0.08%
200% FPL	\$ 53,300	\$ 2.46	\$ 29.52	0.06%	\$ 2.55	\$ 30.60	0.06%
3000 Gal.							
50% FPL	\$ 13,325	\$ 57.45	\$ 689.40	5.17%	\$ 42.05	\$ 504.60	3.79%
100% FPL	\$ 26,650	\$ 88.19	\$ 1,058.28	3.97%	\$ 54.23	\$ 650.76	2.44%
150% FPL	\$ 39,975	\$ 88.19	\$ 1,058.28	2.65%	\$ 84.96	\$ 1,019.52	2.55%
200% FPL	\$ 53,300	\$ 88.19	\$ 1,058.28	1.99%	\$ 84.96	\$ 1,019.52	1.91%
6000 Gal.							
50% FPL	\$ 13,325	\$ 133.38	\$ 1,600.56	12.01%	\$ 113.11	\$ 1,357.32	10.19%
100% FPL	\$ 26,650	\$ 217.08	\$ 2,604.96	9.77%	\$ 133.42	\$ 1,601.04	6.01%
150% FPL	\$ 39,975	\$ 217.08	\$ 2,604.96	6.52%	\$ 216.17	\$ 2,594.04	6.49%
200% FPL	\$ 53,300	\$ 217.08	\$ 2,604.96	4.89%	\$ 216.17	\$ 2,594.04	4.87%
8000 Gal.							
50% FPL	\$ 13,325	\$ 183.99	\$ 2,207.88	16.57%	\$ 160.49	\$ 1,925.88	14.45%
100% FPL	\$ 26,650	\$ 303.00	\$ 3,636.00	13.64%	\$ 183.99	\$ 2,207.88	8.28%
150% FPL	\$ 39,975	\$ 303.00	\$ 3,636.00	9.10%	\$ 309.46	\$ 3,713.52	9.29%
200% FPL	\$ 53,300	\$ 303.00	\$ 3,636.00	6.82%	\$ 309.46	\$ 3,713.52	6.97%

4 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 16,075	\$ 6.85	\$ 82.20	0.51%	\$ (2.85)	\$ (34.20)	-0.21%
100% FPL	\$ 32,150	\$ 2.46	\$ 29.52	0.09%	\$ 6.85	\$ 82.20	0.26%
150% FPL	\$ 48,225	\$ 2.46	\$ 29.52	0.06%	\$ 2.55	\$ 30.60	0.06%
200% FPL	\$ 64,300	\$ 2.46	\$ 29.52	0.05%	\$ 2.55	\$ 30.60	0.05%
3000 Gal							
50% FPL	\$ 16,075	\$ 57.45	\$ 689.40	4.29%	\$ 42.05	\$ 504.60	3.14%
100% FPL	\$ 32,150	\$ 88.19	\$ 1,058.28	3.29%	\$ 54.23	\$ 650.76	2.02%
150% FPL	\$ 48,225	\$ 88.19	\$ 1,058.28	2.19%	\$ 84.96	\$ 1,019.52	2.11%
200% FPL	\$ 64,300	\$ 88.19	\$ 1,058.28	1.65%	\$ 84.96	\$ 1,019.52	1.59%
6000 Gal							
50% FPL	\$ 16,075	\$ 133.38	\$ 1,600.56	9.96%	\$ 113.11	\$ 1,357.32	8.44%
100% FPL	\$ 32,150	\$ 217.08	\$ 2,604.96	8.10%	\$ 133.42	\$ 1,601.04	4.98%
150% FPL	\$ 48,225	\$ 217.08	\$ 2,604.96	5.40%	\$ 216.17	\$ 2,594.04	5.38%
200% FPL	\$ 64,300	\$ 217.08	\$ 2,604.96	4.05%	\$ 216.17	\$ 2,594.04	4.03%
8000 Gal							
50% FPL	\$ 16,075	\$ 183.99	\$ 2,207.88	13.73%	\$ 160.49	\$ 1,925.88	11.98%
100% FPL	\$ 32,150	\$ 303.00	\$ 3,636.00	11.31%	\$ 183.99	\$ 2,207.88	6.87%
150% FPL	\$ 48,225	\$ 303.00	\$ 3,636.00	7.54%	\$ 309.46	\$ 3,713.52	7.70%
200% FPL	\$ 64,300	\$ 303.00	\$ 3,636.00	5.65%	\$ 309.46	\$ 3,713.52	5.78%

*Proposed Rates Include Tier 2 Stormwater Fee, PENNVest Charge, DSIC, and Alcosan charges with Clean Water Assistance Fund Discount

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2025 federal poverty guidelines.

See HHS Poverty Guidelines for 2025, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

OWT Statement 1, Cicero

Appendix A

Resume – Patrick M. Cicero

Patrick M. Cicero

pcicero@pautilitylawproject.org | 717-576-2588

PROFESSIONAL EXPERIENCE

PENNSYLVANIA UTILITY LAW PROJECT

HARRISBURG, PENNSYLVANIA

Of Counsel, February 2025 - Present

Executive Director, July 2015 - January 2020

Co-Director, January 2013 - June 2015

Staff Attorney, January 2011 - December 2012

The Pennsylvania Utility Law Project (PULP) is a specialized legal aid office of the Pennsylvania Legal Aid Network administratively housed within Regional Housing Legal Services. PULP's mission is to promote policies that enable consumers with low and moderate income to receive and maintain affordable utility and energy services and to live in energy-efficient homes.

As Of Counsel, in cases where I am not serving as an attorney, I provide analysis and testimony for PULP's clients in administrative proceedings before relevant state and federal agencies.

In cases where I am not serving as a policy or technical expert, I lead the legal and policy work of the office and provide high-level legal expertise and strategic guidance to the organization. I seek to ensure that PULP's legal and policy advocacy and strategies are designed to effectively and zealously represent the interests of PULP's clients. I work to help shape PULP's legal strategy, influencing policy decisions, and ensuring equitable access to utility services for marginalized communities across Pennsylvania.

PENNSYLVANIA OFFICE OF CONSUMER ADVOCATE

HARRISBURG, PENNSYLVANIA

Consumer Advocate, December 2021 – January 2025

(Confirmed by the Pennsylvania Senate June 7, 2022)

The Office of Consumer Advocate (OCA) is a state agency that represents the interests of Pennsylvania utility consumers before the Pennsylvania Public Utility Commission (PUC), federal regulatory agencies, and state and federal courts. The OCA was created by the Pennsylvania General Assembly in 1976 and is an independent office within the Office of Attorney General. As Consumer Advocate, I served as the head of the office and directed all policy and legal advocacy.

PENNSYLVANIA LEGAL AID NETWORK, INC.

HARRISBURG, PENNSYLVANIA

Executive Director, January 2020 – December 2021

The Pennsylvania Legal Aid Network, Inc. (PLAN, Inc.) is a client-centered organization that provides leadership, funding, training, and support to a coordinated network of independent legal aid organizations that deliver civil legal aid to low-income Pennsylvanians and victims of domestic violence. As Executive Director, I provided strategic leadership and direction to PLAN Inc.'s activities and oversaw its advocacy, fundraising, and management.

PROFESSIONAL EXPERIENCE – CONT.

HONORABLE SYLVIA H. RAMBO, DISTRICT JUDGE HARRISBURG, PENNSYLVANIA
THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
Senior Judicial Law Clerk, May 2009 - December 2010

Analyzed federal and state law on civil and criminal motions in all phases of litigation. Drafted judicial opinions in response to civil and criminal motions, including motions to suppress, motions to dismiss, summary judgment, post-trial motions, and habeas corpus petitions. Drafted comments that were given by Judge Rambo at public speaking events and supervised her law clerks and judicial interns.

MIDPENN LEGAL SERVICES HARRISBURG, PENNSYLVANIA
Managing Attorney, January 2009 - April 2009
Staff Attorney, September 2004 - December 2008

MidPenn Legal Services (MidPenn) is a non-profit organization providing legal services to low-income individuals and families, the disabled, the elderly, children, and survivors of domestic violence. I led MidPenn's Consumer Unit where I focused on litigating consumer and housing cases related to anti-predatory mortgage lending and consumer bankruptcy and defended clients against unscrupulous debt collection practices.

THE HONORABLE SYLVIA H. RAMBO, DISTRICT JUDGE HARRISBURG, PENNSYLVANIA
THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
Judicial Law Clerk, August 2002 - August 2004

Researched and analyzed federal and state law on civil and criminal motions in all phases of litigation. Drafted judicial opinions in response to civil and criminal motions, including motions to suppress, motions to dismiss, summary judgment, post-trial motions, and habeas corpus petitions.

TEACHING EXPERIENCE

MESSIAH UNIVERSITY MECHANICSBURG, PENNSYLVANIA

Adjunct Professor of Sociology and Criminal Justice (Periodic since 2015)

Courses Taught: Social Inequality
 Criminal Law and Criminal Procedure
 Ethics in the Criminal Justice System

Visiting Lecturer of Sociology and Criminal Justice, August 2014 - May 2015

Courses Taught: Introduction to Sociology
 Sociocultural Theory
 Social Inequality
 Social Conflict, Justice and Peacemaking
 Religion and Society
 Evidence, Search and Seizure

Adjunct Instructor in General Education

Courses Taught: Law and Social Issues

EDUCATION

TEMPLE UNIVERSITY, BEASLEY SCHOOL OF LAW

PHILADELPHIA, PENNSYLVANIA

Juris Doctor, magna cum laude, 2002

MESSIAH COLLEGE (NOW MESSIAH UNIVERSITY)

MECHANICSBURG, PENNSYLVANIA

Bachelor of Arts in Sociology, magna cum laude, 1999

PUBLICATIONS

Pennsylvania Consumer Law by Carolyn Carter, Bisel Publishing Co., 2003, Supp. 2010-2012, Contributing Author.

MEMBERSHIPS, AFFILIATIONS, COMMITTEES

Pennsylvania State Bar (admitted 2002)

Middle District of Pennsylvania Bar (admitted 2004)

Dauphin County Bar Association

Pennsylvania Bar Association

Pennsylvania Bar Association, House of Delegates, Zone 3, (2021-2024)

Pennsylvania Department of Human Services

- LIHEAP Advisory Committee (2015-2020 and 2021-2025)

Pennsylvania Department of Environmental Protection,

- Pennsylvania Energy Development Authority, *ex officio* (2021-2025)

Pennsylvania Public Utility Commission

- Consumer Advisory Council (2025-Present)

- Pennsylvania Sustainable Energy Board, *ex officio* (2021-2025)

Pennsylvania Department of Community and Economic Development

- Weatherization Assistance Program, Policy Advisory Council (2015-2020)

National Association of State Utility Consumer Advocates (NASUCA), Executive Committee (2023-2025)

OWT Statement 1, Cicero

Appendix B

Interrogatories of OWT to PW

Pittsburgh Water response to OWT 1-1, Attachment
Pittsburgh Water response to OWT 1-3, Attachment
Pittsburgh Water response to OWT 1-5
Pittsburgh Water response to OWT 1-6
Pittsburgh Water response to OWT 1-7
Pittsburgh Water response to OWT 1-10, Attachments A-D
Pittsburgh Water response to OWT 1-19, Attachments
Pittsburgh Water response to OWT 1-20, Attachments

Pittsburgh Water response to OWT 2-2
Pittsburgh Water response to OWT 2-3
Pittsburgh Water response to OWT 2-5
Attachment to OWT 2-2, 2-3, and 2-5
Pittsburgh Water response to OWT 2-4
Pittsburgh Water response to OWT 2-6
Pittsburgh Water response to OWT 2-8
Pittsburgh Water response to OWT 2-9
Pittsburgh Water response to OWT 2-10
Pittsburgh Water response to OWT 2-16.C
Pittsburgh Water response to OWT 2-16, Attachment B
Pittsburgh Water response to OWT 2-16, Attachment E
Pittsburgh Water response to OWT 2-24
Pittsburgh Water response to OWT 2-27

Pittsburgh Water response to OWT 3-3, Attachment
Pittsburgh Water response to OWT 3.4, Attachments A-B
Pittsburgh Water response to OWT 3-6, Attachment
Pittsburgh Water response to OWT 3-7, Attachment
Pittsburgh Water response to OWT 3-13, Attachment
Pittsburgh Water response to OWT 3-14
Pittsburgh Water response to OWT 3-17, Attachment
Pittsburgh Water response to OWT 3-23
Pittsburgh Water response to OWT 3-24, Attachment
Pittsburgh Water response to OWT 3-27(e)
Pittsburgh Water response to OWT 3-34(a)(b)(d)
Pittsburgh Water response to OWT 3-42, Attachment

Pittsburgh Water response to OWT 4-2, Attachment
Pittsburgh Water response to OWT 4-7
Pittsburgh Water response to OWT 4-12
Pittsburgh Water response to OWT 4-31A, Attachment

Pittsburgh Water response to OWT 5-3
Pittsburgh Water response to OWT 5-6(a)
Pittsburgh Water response to OWT 6-1, Attachment
Pittsburgh Water response to OWT 6-3, Attachment A
Pittsburgh Water response to OWT 6-4

Interrogatories of OCA to PW

Pittsburgh Water response to OCA 4-3, Attachments

Interrogatories of I&E to PW

Pittsburgh Water response to I&E RE-29, Attachment

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set I
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-I-1 From January 2022 to present, disaggregated by month and year, as of the last day of the month/ year, the total number of Pittsburgh Water customers, disaggregated by the following customer segments:

- A. All residential customers;
- B. Residential customers, excluding confirmed low income customers and Bill Discount Program (BDP) customers;
- C. Confirmed low income customers, excluding BDP customers;
- D. Customers enrolled in Pittsburgh Water’s BDP.

Please provide this data in a live Excel spreadsheet.

Response:

See attachment OWT-1-1 (excel).

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: August 21, 2025

OWT-1-1

Residential Customer Segments Aug 2022 Forward

Date	Customers	Date	Customers
Aug-22	6,792	Jan-24	7,565
Sep-22	6,820	Feb-24	7,628
Oct-22	6,856	Mar-24	7,677
Nov-22	6,883	Apr-24	7,740
Dec-22	6,917	May-24	7,808
Jan-23	6,945	Jun-24	7,873
Feb-23	6,994	Jul-24	7,924
Mar-23	7,042	Aug-24	7,983
Apr-23	7,069	Sep-24	8,038
May-23	7,136	Oct-24	8,104
Jun-23	7,173	Nov-24	8,173
Jul-23	7,259	Dec-24	8,226
Aug-23	7,310	Jan-25	8,277
Sep-23	7,354	Feb-25	8,314
Oct-23	7,415	Mar-25	8,370
Nov-23	7,462	Apr-25	8,410
Dec-23	7,519	May-25	8,440
		Jun-25	8,458

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table(“OWT”), Set I
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-I-3 From January 2022 to present, how many confirmed low income customers did Pittsburgh Water serve, disaggregated by month and year, as of the last day of the month?

Please provide this data in a live Excel spreadsheet.

Response:

See attachment OWT-1-3 Confirmed Low Income Served (excel).

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: August 19, 2025

OWT-I-3 Confirmed Low Income Served

Date	Count
Aug-22	1934
Sep-22	1935
Oct-22	1981
Nov-22	1984
Dec-22	2015
Jan-23	2051
Feb-23	2079
Mar-23	2114
Apr-23	2194
May-23	2240
Jun-23	2404
Jul-23	2550
Aug-23	2711
Sep-23	2902
Oct-23	3119
Nov-23	3434
Dec-23	3671
Jan-24	3983
Feb-24	4296
Mar-24	4562
Apr-24	4742
May-24	4987
Jun-24	5254
Jul-24	5440
Aug-24	5696
Sep-24	5849
Oct-24	5996
Nov-24	6279
Dec-24	6539
Jan-25	6802
Feb-25	7082
Mar-25	7264
Apr-25	7265

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table(“OWT”), Set I
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-I-5 Please identify all categories or identifiers that Pittsburgh Water includes when calculating its “confirmed low income customer”. If Pittsburgh Water uses a different definition or categorization criteria for “confirmed low income customer” for any purpose, please identify the alternative definition and/or criteria and explain why a different definition is used.

Response: A Confirmed Low Income flag is placed on an account whenever a customer is identified as being at or below 200% of the Federal Poverty Level (FPL). Most customers are identified during enrollment into the Bill Discount Program or a qualifying payment arrangement. Other customers may be identified after receiving a Hardship Grant or ALCOSAN Clean Water Assistance Fund grant. A customer may also be identified during a telephone conversation with a Customer Service Representative.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table(“OWT”), Set I
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-I-6 Please indicate how Pittsburgh Water identifies low income customers (customers at or below 150% the FPIG) as confirmed low income customers, and what information and/or documentation Pittsburgh Water relies on to identify such customers. Please also provide a copy of any current policies, procedures, or other documents which describe how Pittsburgh Water identifies confirmed low income customers.

Response: When Pittsburgh Water increased the eligibility limit for its Customer Assistance Programs from 150% to 200% of the FPL, effective February 15, 2024, the Confirmed Low Income criteria was also increased to 200%. Customers are identified through verbal attestation in conversations with PGH2O Cares and Customer Service Representatives. Accounts are identified by a Confirmed Low Income banner that displays at the top of an account in our Customer Information System. Please see the .pdf titled, “OWT-I-6 Confirmed Low Income Banner”.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table(“OWT”), Set I
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-I-7 As of the most recent date available, how many estimated low income customers does Pittsburgh Water serve? Please explain how Pittsburgh Water arrived at these estimates, and provide a copy of any supporting documentation used to determine these estimates.

Response: Please see Pittsburgh Water Exhibit JAM-12 Updated Household Affordability Analysis.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table(“OWT”), Set I
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-I-10 For 2022 to present, disaggregated by month and year, as of the last day of the month/ year, please indicate the following:

- A. The number of participants who entered the Pittsburgh Water’s BDP with unpaid account balances; and
- B. The mean and median amount of dollars of unpaid account balances for BDP participants, at the time that those participants entered the BDP.

Please provide this data in a live Excel spreadsheet.

Response:

See OWT-1-10 Attach A through Attach D (excel).

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: August 19, 2025

OWT-1-10 Attach A

2022 Unpaid Balances Entering BDP with Mean and Median Unpaid Dollars

Month/Year	Count	Mean	Median
Jan-22	13	825.8984615	430.94
Feb-22	11	851.524	328.995
Mar-22	6	606.9316667	231.375
Apr-22	8	737.0425	248.635
May-22	6	2554.845	2269.105
Jun-22	6	1115.248326	219.565
Jul-22	8	140.765	32.355
Aug-22	14	461.7428571	370.01
Sep-22	26	1117.629231	760.7
Oct-22	29	1085.178276	513.69
Nov-22	19	1176.011579	763.15
Dec-22	52	1437.583654	954.925

OCA-1-10 Attach B 2023 Unpaid Balances Entering BDP with Mean and Median Unpaid Dollars

Month/Year	Count	Mean	Median
Jan-23	29	1284.294828	615.59
Feb-23	26	1581.636154	830.435
Mar-23	42	1615.249286	1039.21
Apr-23	38	1338.545	869.045
May-23	54	961.8681481	667.825
Jun-23	47	1550.275957	712.33
Jul-23	37	2522.352973	2152.64
Aug-23	90	1340.003667	630.04
Sep-23	71	735.6953521	537.73
Oct-23	99	954.0352525	410
Nov-23	88	951.7672727	514.9
Dec-23	122	1071.343279	472.645

OWT-1-10 Attach C 2024 Unpaid Balances Entering BDP with Mean and Median Unpaid Dollars

Month/Year	Count	Mean	Median
Jan-24	172	1419.477442	519.955
Feb-24	130	1209.798154	575.46
Mar-24	168	1239.549107	563.24
Apr-24	226	1884.555133	1018.445
May-24	206	1315.440485	574.85
Jun-24	117	1207.788376	535.44
Jul-24	183	1328.699836	630.35
Aug-24	168	1316.113631	395.305
Sep-24	128	1244.872813	367.925
Oct-24	136	1072.740147	532.615
Nov-24	132	1218.781212	534.72
Dec-24	135	1457.240815	775.38

OWT-1-10 Attach D 2025 Unpaid Balances Entering BDP with Mean and Median Unpaid Dollars

Month/Year	Count	Mean	Median
Jan-25	206	1016.867379	501.69
Feb-25	193	1451.785026	567.18
Mar-25	228	1279.10364	622.72
Apr-25	221	1508.116425	649.1
May-25	164	1960.56189	717.86
Jun-25	129	1436.684806	504.31

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set I
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-I-19 From January 2022 to present, please provide the median and mean arrearages for Pittsburgh Water customers, disaggregated by month and year, as of the last day of the month/ year, for each of the following customer segments:

- A. All residential customers;
- B. Residential customers, excluding confirmed low income customers and BDP customers;
- C. Confirmed low income customers;
- D. Confirmed low income customers, excluding BDP customers;
- E. BDP customers.

Please provide this data in a live Excel spreadsheet.

Response:

See attachments OWT-1-19 (excel).

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: August 26, 2025

	Mean arrearage	Median arrearage
Jan-22	426.96	129.88
Feb-22	396.17	133.56
Mar-22	388.09	126.95
Apr-22	436.92	121.83
May-22	412.16	130.27
Jun-22	408.21	121.97
Jul-22	430.63	123.58
Aug-22	781.55	177.98
Sep-22	465.54	120.99
Oct-22	914.81	236.02
Nov-22	991.93	293.65
Dec-22	996.86	300.42
Jan-23	982.51	290.46
Feb-23	1,026.66	317.21
Mar-23	1,058.57	338.66
Apr-23	1,050.45	335.12
May-23	1,076.81	326.59
Jun-23	421.58	101.36
Jul-23	433.57	116.35
Aug-23	412.97	120.97
Sep-23	450.27	101.16
Oct-23	439.12	116.99
Nov-23	451.05	112.58
Dec-23	441.42	117.53
Jan-24	444.63	105.67
Feb-24	464.22	120.72
Mar-24	462.08	119.76
Apr-24	398.83	100.12
May-24	489.04	116.20
Jun-24	483.51	128.75
Jul-24	488.14	131.73
Aug-24	483.70	125.14
Sep-24	470.31	131.90
Oct-24	487.47	119.51
Nov-24	461.63	122.07
Dec-24	483.15	116.20
Jan-25	482.00	130.25
Feb-25	488.22	139.35
Mar-25	469.87	119.11
Apr-25	470.99	112.24
May-25	468.00	116.76
Jun-25	452.84	118.31

	Mean arrearage	Median arrearage
Jan-22	\$2,663.35	\$1,436.89
Feb-22	\$2,729.09	\$1,440.58
Mar-22	\$2,698.99	\$1,442.58
Apr-22	\$2,874.19	\$1,523.20
May-22	\$3,028.28	\$1,576.71
Jun-22	\$2,992.71	\$1,551.43
Jul-22	\$3,063.09	\$1,561.59
Aug-22	\$2,177.71	\$818.97
Sep-22	\$2,184.43	\$826.00
Oct-22	\$2,188.87	\$828.69
Nov-22	\$2,214.75	\$839.35
Dec-22	\$2,195.94	\$834.40
Jan-23	\$2,196.10	\$834.55
Feb-23	\$2,206.65	\$839.97
Mar-23	\$2,205.39	\$844.72
Apr-23	\$2,210.29	\$846.44
May-23	\$2,213.26	\$849.57
Jun-23	\$2,215.32	\$852.68
Jul-23	\$2,217.42	\$854.47
Aug-23	\$2,220.43	\$857.29
Sep-23	\$2,218.69	\$853.63
Oct-23	\$2,218.62	\$852.49
Nov-23	\$2,220.08	\$854.70
Dec-23	\$2,224.74	\$858.07
Jan-24	\$2,230.50	\$862.85
Feb-24	\$2,245.21	\$867.58
Mar-24	\$2,257.34	\$891.00
Apr-24	\$2,260.72	\$891.23
May-24	\$2,296.17	\$898.52
Jun-24	\$2,273.55	\$892.24
Jul-24	\$2,267.38	\$892.39
Aug-24	\$2,268.10	\$891.51
Sep-24	\$2,285.63	\$893.84
Oct-24	\$2,292.44	\$898.17
Nov-24	\$2,272.62	\$896.07
Dec-24	\$2,276.22	\$898.82
Jan-25	\$2,280.27	\$900.96
Feb-25	\$2,300.96	\$903.62
Mar-25	\$2,288.18	\$904.62
Apr-25	\$2,337.26	\$914.97
May-25	\$2,333.59	\$911.51
Jun-25	\$2,356.43	\$911.62

	Mean arrearage	Median arrearage
Jan-22	\$815.16	\$284.51
Feb-22	\$805.20	\$195.69
Mar-22	\$823.00	\$201.70
Apr-22	\$794.61	\$183.94
May-22	\$760.02	\$170.59
Jun-22	\$774.18	\$179.66
Jul-22	\$824.80	\$185.33
Aug-22	\$1,185.50	\$580.67
Sep-22	\$1,067.46	\$442.38
Oct-22	\$1,102.06	\$483.77
Nov-22	\$1,170.47	\$539.38
Dec-22	\$1,178.25	\$552.18
Jan-23	\$1,171.40	\$549.39
Feb-23	\$1,223.89	\$602.64
Mar-23	\$1,259.82	\$619.03
Apr-23	\$1,290.52	\$634.74
May-23	\$1,317.15	\$656.92
Jun-23	\$1,323.07	\$669.97
Jul-23	\$1,337.93	\$675.70
Aug-23	\$1,331.53	\$665.98
Sep-23	\$1,312.27	\$621.58
Oct-23	\$1,301.76	\$599.13
Nov-23	\$1,300.59	\$598.36
Dec-23	\$1,317.47	\$595.28
Jan-24	\$1,315.84	\$582.05
Feb-24	\$1,347.03	\$602.55
Mar-24	\$1,360.16	\$630.36
Apr-24	\$1,374.02	\$633.57
May-24	\$1,403.39	\$629.19
Jun-24	\$1,403.29	\$620.66
Jul-24	\$1,390.70	\$606.15
Aug-24	\$1,379.42	\$593.84
Sep-24	\$1,382.62	\$593.91
Oct-24	\$1,400.28	\$613.46
Nov-24	\$1,381.65	\$589.91
Dec-24	\$1,391.33	\$595.03
Jan-25	\$1,427.84	\$617.59
Feb-25	\$1,454.14	\$622.12
Mar-25	\$1,444.82	\$602.14
Apr-25	\$1,471.53	\$615.67
May-25	\$1,465.04	\$589.22
Jun-25	\$1,439.88	\$558.77

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set I
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-I-20 For the Responses to OWT to PWSA 1-19, please additionally disaggregate by service type (e.g. water only; wastewater only; stormwater only; combined, specifying the combined services). Please provide this data in a live Excel spreadsheet.

Response:

See attachment OWT-1-20 (excel)

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: August 27, 2025

OWT-1-20

Mean Median Arrearages by Customer Type and Service Type

Water only			Sewer only			Combination		
	Mean arrearage	Median arrearage		Mean arrearage	Median arrearage		Mean arrearage	Median arrearage
Aug-22	575.47	113.40	Aug-22	819.30	346.21	Aug-22	1,171.88	399.11
Sep-22	454.32	112.90	Sep-22	588.76	152.52	Sep-22	813.71	201.85
Oct-22	402.23	110.88	Oct-22	621.80	186.34	Oct-22	919.82	273.18
Nov-22	519.69	152.57	Nov-22	773.48	307.08	Nov-22	965.24	313.00
Dec-22	418.57	125.72	Dec-22	682.29	235.15	Dec-22	1,073.46	392.67
Jan-23	431.91	128.76	Jan-23	663.30	218.54	Jan-23	1,062.74	383.00
Feb-23	490.48	166.73	Feb-23	712.39	256.78	Feb-23	1,116.45	424.16
Mar-23	528.79	203.11	Mar-23	737.88	295.10	Mar-23	1,159.43	453.37
Apr-23	588.11	196.81	Apr-23	732.98	285.02	Apr-23	1,118.57	457.35
May-23	584.01	159.19	May-23	739.80	270.11	May-23	1,185.32	454.49
Jun-23	585.13	148.11	Jun-23	758.50	278.84	Jun-23	1,230.27	465.91
Jul-23	551.60	101.49	Jul-23	774.39	269.76	Jul-23	1,222.55	442.69
Aug-23	555.45	104.71	Aug-23	761.61	254.13	Aug-23	1,219.80	444.51
Sep-23	571.29	120.24	Sep-23	795.18	282.80	Sep-23	1,261.80	482.74
Oct-23	605.57	151.45	Oct-23	781.96	258.83	Oct-23	1,236.05	447.94
Nov-23	626.98	158.10	Nov-23	809.77	288.23	Nov-23	1,269.10	463.49
Dec-23	623.71	142.36	Dec-23	828.63	306.06	Dec-23	1,268.89	451.31
Jan-24	653.16	169.91	Jan-24	787.95	247.42	Jan-24	1,274.68	451.31
Feb-24	678.25	169.37	Feb-24	829.24	282.64	Feb-24	1,319.27	482.70
Mar-24	633.93	136.45	Mar-24	861.71	308.60	Mar-24	1,326.51	479.84
Apr-24	626.68	121.69	Apr-24	831.86	271.32	Apr-24	1,366.93	490.19
May-24	681.95	152.22	May-24	890.93	304.82	May-24	1,390.45	485.02
Jun-24	663.08	136.31	Jun-24	862.66	260.19	Jun-24	1,430.61	522.08
Jul-24	705.89	137.92	Jul-24	875.91	276.56	Jul-24	1,419.09	499.73
Aug-24	700.80	138.96	Aug-24	878.21	280.21	Aug-24	1,399.10	493.60
Sep-24	661.70	133.69	Sep-24	858.88	256.75	Sep-24	1,407.63	488.77
Oct-24	684.43	166.09	Oct-24	891.55	290.54	Oct-24	1,450.21	528.36
Nov-24	655.92	137.60	Nov-24	842.30	239.83	Nov-24	1,404.92	473.14
Dec-24	670.31	151.74	Dec-24	875.09	258.42	Dec-24	1,444.60	485.21
Jan-25	764.42	156.77	Jan-25	899.53	276.51	Jan-25	1,499.20	522.89
Feb-25	726.16	118.29	Feb-25	900.31	263.68	Feb-25	1,540.54	538.53
Mar-25	744.29	151.68	Mar-25	869.89	234.34	Mar-25	1,484.72	466.21
Apr-25	787.42	139.00	Apr-25	914.85	254.49	Apr-25	1,533.38	469.41
May-25	810.29	122.47	May-25	895.01	236.88	May-25	1,505.99	431.69
Jun-25	731.10	100.76	Jun-25	877.88	223.61	Jun-25	1,509.26	437.19

Mean Median Arrearages by Customer Type and Service Type

Water only			Sewer only			Combination		
	Mean arrearage	Median arrearage		Mean arrearage	Median arrearage		Mean arrearage	Median arrearage
Aug-22	553.24	107.49	Aug-22	731.69	275.23	Aug-22	1,126.44	342.60
Sep-22	414.74	104.35	Sep-22	498.47	126.24	Sep-22	750.60	179.66
Oct-22	367.04	97.10	Oct-22	531.10	155.54	Oct-22	857.82	239.69
Nov-22	479.11	141.25	Nov-22	677.36	244.65	Nov-22	903.37	275.62
Dec-22	386.26	116.49	Dec-22	585.21	190.74	Dec-22	1,016.33	348.90
Jan-23	399.33	126.59	Jan-23	567.37	175.89	Jan-23	1,004.99	340.30
Feb-23	452.01	151.06	Feb-23	612.01	211.80	Feb-23	1,056.68	373.09
Mar-23	485.19	191.82	Mar-23	630.18	241.39	Mar-23	1,101.16	401.22
Apr-23	551.16	173.19	Apr-23	624.50	229.56	Apr-23	1,039.78	401.82
May-23	554.26	145.18	May-23	628.92	209.13	May-23	1,114.69	390.82
Jun-23	547.97	135.45	Jun-23	646.84	216.47	Jun-23	1,160.63	393.12
Jul-23	511.33	89.33	Jul-23	662.51	208.03	Jul-23	1,149.35	370.34
Aug-23	511.00	101.39	Aug-23	650.82	203.55	Aug-23	1,145.96	376.86
Sep-23	529.06	116.75	Sep-23	684.14	218.31	Sep-23	1,202.65	424.64
Oct-23	566.37	139.25	Oct-23	672.45	193.16	Oct-23	1,175.51	389.18
Nov-23	587.55	143.55	Nov-23	701.78	219.58	Nov-23	1,214.34	411.88
Dec-23	589.57	125.96	Dec-23	719.27	230.93	Dec-23	1,213.44	391.57
Jan-24	619.99	145.08	Jan-24	677.75	186.54	Jan-24	1,215.90	391.80
Feb-24	647.12	155.31	Feb-24	716.29	210.59	Feb-24	1,261.21	422.54
Mar-24	602.23	110.25	Mar-24	734.29	227.50	Mar-24	1,268.36	421.09
Apr-24	589.80	107.72	Apr-24	703.51	191.38	Apr-24	1,312.76	434.76
May-24	650.45	146.83	May-24	763.70	221.49	May-24	1,331.66	421.27
Jun-24	646.40	135.74	Jun-24	737.99	190.42	Jun-24	1,374.63	459.87
Jul-24	689.02	131.09	Jul-24	752.04	208.80	Jul-24	1,364.90	447.15
Aug-24	680.14	135.23	Aug-24	756.19	212.39	Aug-24	1,342.57	437.71
Sep-24	636.84	105.75	Sep-24	731.99	197.23	Sep-24	1,354.19	440.46
Oct-24	660.91	153.51	Oct-24	768.04	223.19	Oct-24	1,399.51	479.26
Nov-24	638.06	129.00	Nov-24	716.28	181.14	Nov-24	1,347.99	418.23
Dec-24	654.42	134.54	Dec-24	749.63	198.34	Dec-24	1,392.92	424.91
Jan-25	747.34	122.00	Jan-25	770.07	206.48	Jan-25	1,454.43	464.83
Feb-25	717.08	101.91	Feb-25	767.22	192.90	Feb-25	1,495.90	480.46
Mar-25	728.14	135.11	Mar-25	735.31	178.72	Mar-25	1,427.83	398.08
Apr-25	787.36	120.19	Apr-25	783.01	189.29	Apr-25	1,480.38	397.43
May-25	802.20	117.89	May-25	764.35	174.73	May-25	1,439.80	350.07
Jun-25	725.39	99.48	Jun-25	749.83	167.89	Jun-25	1,451.33	363.55

OWT-1-20

Mean Median Arrearages by Customer Type and Service Type

Water only			Sewer only			Combination		
	Mean arrearage	Median arrearage		Mean arrearage	Median arrearage		Mean arrearage	Median arrearage
Aug-22	785.27	383.68	Aug-22	1,184.36	693.37	Aug-22	1,392.57	729
Sep-22	854.46	469.12	Sep-22	1,100.30	546.47	Sep-22	1,263.95	599.03
Oct-22	772.91	365.29	Oct-22	1,117.27	553.41	Oct-22	1,325.90	649.89
Nov-22	885.55	536.71	Nov-22	1,205.20	651.69	Nov-22	1,369.49	695.66
Dec-22	739.67	401.80	Dec-22	1,163.03	610.67	Dec-22	1,426.85	735.30
Jan-23	738.72	401.80	Jan-23	1,153.81	594.91	Jan-23	1,425.15	734.24
Feb-23	846.85	486.58	Feb-23	1,192.51	633.56	Feb-23	1,482.00	797.27
Mar-23	941.14	558.20	Mar-23	1,243.62	684.45	Mar-23	1,521.73	806.75
Apr-23	895.25	557.78	Apr-23	1,254.10	698.78	Apr-23	1,578.19	836.21
May-23	796.46	491.35	May-23	1,276.00	711.16	May-23	1,592.83	832.13
Jun-23	872.16	443.32	Jun-23	1,266.29	699.67	Jun-23	1,616.40	856.33
Jul-23	873.27	495.28	Jul-23	1,278.05	731.63	Jul-23	1,614.59	848.68
Aug-23	951.05	604.72	Aug-23	1,277.56	719.54	Aug-23	1,601.28	836.36
Sep-23	867.74	424.51	Sep-23	1,274.90	712.17	Sep-23	1,570.71	772.80
Oct-23	852.82	484.62	Oct-23	1,251.18	676.75	Oct-23	1,552.57	736.09
Nov-23	882.39	412.05	Nov-23	1,255.05	682.39	Nov-23	1,551.22	735.57
Dec-23	794.38	311.14	Dec-23	1,280.55	707.16	Dec-23	1,552.17	716.41
Jan-24	808.42	345.22	Jan-24	1,241.44	632.12	Jan-24	1,570.19	738.64
Feb-24	792.95	372.62	Feb-24	1,270.34	663.05	Feb-24	1,608.67	768.17
Mar-24	791.53	313.67	Mar-24	1,316.88	703.01	Mar-24	1,596.31	753.57
Apr-24	907.52	502.47	Apr-24	1,321.84	699.57	Apr-24	1,621.03	770.63
May-24	827.31	504.67	May-24	1,343.24	725.69	May-24	1,652.93	763.44
Jun-24	680.95	221.77	Jun-24	1,311.99	672.30	Jun-24	1,671.56	765.60
Jul-24	714.30	273.85	Jul-24	1,313.88	651.50	Jul-24	1,648.48	747.81
Aug-24	720.36	342.99	Aug-24	1,301.39	660.98	Aug-24	1,642.62	730.68
Sep-24	740.78	363.23	Sep-24	1,319.53	684.78	Sep-24	1,643.78	730.40
Oct-24	748.34	412.87	Oct-24	1,313.70	667.05	Oct-24	1,673.44	743.30
Nov-24	668.89	387.28	Nov-24	1,307.50	672.51	Nov-24	1,660.22	723.28
Dec-24	654.85	414.37	Dec-24	1,318.96	698.47	Dec-24	1,674.92	731.53
Jan-25	740.63	504.67	Jan-25	1,349.73	719.54	Jan-25	1,696.09	738.93
Feb-25	632.70	363.25	Feb-25	1,354.47	708.62	Feb-25	1,731.54	738.39
Mar-25	679.55	432.59	Mar-25	1,348.86	682.88	Mar-25	1,730.86	726.18
Apr-25	599.50	326.35	Apr-25	1,376.99	719.11	Apr-25	1,754.27	724.71
May-25	662.74	404.70	May-25	1,349.99	659.60	May-25	1,769.54	726.41
Jun-25	570.00	259.60	Jun-25	1,335.24	633.44	Jun-25	1,750.51	694.22

OWT-1-20

Mean Median Arrearages by Customer Type and Service Type

Water only			Sewer only			Combination		
	Mean arrearage	Median arrearage		Mean arrearage	Median arrearage		Mean arrearage	Median arrearage
Aug-22	785.27	383.68	Aug-22	1,178.82	695.67	Aug-22	1,418.18	747.60
Sep-22	854.46	469.12	Sep-22	1,093.78	553.07	Sep-22	1,289.47	624.00
Oct-22	772.91	365.29	Oct-22	1,107.34	557.66	Oct-22	1,350.43	674.50
Nov-22	885.55	536.71	Nov-22	1,191.15	648.39	Nov-22	1,393.74	718.01
Dec-22	776.38	421.50	Dec-22	1,159.06	617.60	Dec-22	1,441.54	735.62
Jan-23	775.39	421.50	Jan-23	1,148.36	607.23	Jan-23	1,444.05	737.43
Feb-23	846.85	486.58	Feb-23	1,181.00	631.31	Feb-23	1,507.09	816.04
Mar-23	941.14	558.20	Mar-23	1,229.72	682.48	Mar-23	1,538.32	816.70
Apr-23	941.39	565.40	Apr-23	1,244.01	699.60	Apr-23	1,606.96	847.89
May-23	837.85	514.80	May-23	1,265.61	712.60	May-23	1,614.92	842.67
Jun-23	920.13	445.50	Jun-23	1,253.14	690.83	Jun-23	1,638.82	869.45
Jul-23	923.87	565.20	Jul-23	1,268.18	736.66	Jul-23	1,625.47	860.52
Aug-23	951.05	604.72	Aug-23	1,265.46	716.36	Aug-23	1,606.63	840.50
Sep-23	867.74	424.51	Sep-23	1,263.42	711.90	Sep-23	1,570.32	773.60
Oct-23	852.82	484.62	Oct-23	1,233.68	678.31	Oct-23	1,551.43	736.49
Nov-23	882.39	412.05	Nov-23	1,237.96	686.14	Nov-23	1,553.08	756.72
Dec-23	794.38	311.14	Dec-23	1,264.88	707.16	Dec-23	1,553.56	716.96
Jan-24	808.42	345.22	Jan-24	1,220.50	627.80	Jan-24	1,567.29	735.38
Feb-24	792.95	372.62	Feb-24	1,253.85	654.44	Feb-24	1,601.58	760.60
Mar-24	791.53	313.67	Mar-24	1,295.96	687.26	Mar-24	1,591.26	754.73
Apr-24	962.36	597.70	Apr-24	1,300.67	684.81	Apr-24	1,615.57	775.11
May-24	827.31	504.67	May-24	1,321.61	708.79	May-24	1,659.70	785.12
Jun-24	711.48	304.86	Jun-24	1,295.07	660.51	Jun-24	1,672.32	783.18
Jul-24	714.30	273.85	Jul-24	1,298.32	640.61	Jul-24	1,651.07	754.30
Aug-24	720.36	342.99	Aug-24	1,281.03	651.95	Aug-24	1,643.29	735.40
Sep-24	740.78	363.23	Sep-24	1,304.59	684.83	Sep-24	1,650.48	740.77
Oct-24	748.34	412.87	Oct-24	1,304.30	660.27	Oct-24	1,677.44	748.15
Nov-24	699.75	497.99	Nov-24	1,292.37	655.21	Nov-24	1,659.29	721.33
Dec-24	654.85	414.37	Dec-24	1,307.56	695.77	Dec-24	1,670.81	726.90
Jan-25	740.63	504.67	Jan-25	1,344.77	716.54	Jan-25	1,690.14	733.16
Feb-25	632.70	363.25	Feb-25	1,347.86	708.62	Feb-25	1,724.83	728.44
Mar-25	679.55	432.59	Mar-25	1,337.24	670.56	Mar-25	1,726.98	716.63
Apr-25	599.50	326.35	Apr-25	1,371.04	720.08	Apr-25	1,745.17	711.50
May-25	692.56	445.15	May-25	1,335.75	650.73	May-25	1,762.60	716.65
Jun-25	593.46	304.50	Jun-25	1,328.02	632.98	Jun-25	1,746.28	683.17

OWT-1-20

Mean Median Arrearages by Customer Type and Service Type

Water only			Sewer only			Combination		
	Mean arrearage	Median arrearage		Mean arrearage	Median arrearage		Mean arrearage	Median arrearage
Aug-22	811.58	391.23	Aug-22	1,121.08	563.94	Aug-22	1,233.78	601.06
Sep-22	897.47	457.38	Sep-22	1,012.90	412.21	Sep-22	1,105.19	458.36
Oct-22	771.46	344.35	Oct-22	1,024.39	427.76	Oct-22	1,157.57	523.29
Nov-22	928.29	458.29	Nov-22	1,122.78	514.20	Nov-22	1,201.28	550.54
Dec-22	713.12	264.77	Dec-22	1,083.93	508.62	Dec-22	1,246.83	583.93
Jan-23	711.95	264.77	Jan-23	1,074.92	486.45	Jan-23	1,242.04	588.68
Feb-23	862.17	435.77	Feb-23	1,119.42	544.43	Feb-23	1,298.99	642.65
Mar-23	973.48	558.20	Mar-23	1,154.39	567.13	Mar-23	1,331.63	669.99
Apr-23	897.50	542.38	Apr-23	1,167.80	583.61	Apr-23	1,377.22	692.64
May-23	772.91	205.40	May-23	1,194.75	591.91	May-23	1,404.12	702.19
Jun-23	919.77	263.81	Jun-23	1,181.71	574.52	Jun-23	1,423.04	731.48
Jul-23	958.72	305.59	Jul-23	1,193.06	603.92	Jul-23	1,436.52	726.00
Aug-23	1,021.53	364.82	Aug-23	1,177.87	570.26	Aug-23	1,436.94	730.46
Sep-23	978.28	321.30	Sep-23	1,189.61	591.27	Sep-23	1,393.89	654.58
Oct-23	953.61	301.73	Oct-23	1,173.88	547.11	Oct-23	1,386.74	627.64
Nov-23	998.34	278.55	Nov-23	1,176.07	549.59	Nov-23	1,383.05	626.85
Dec-23	897.40	308.32	Dec-23	1,201.02	559.90	Dec-23	1,393.07	613.45
Jan-24	913.85	258.26	Jan-24	1,169.19	504.49	Jan-24	1,413.65	621.63
Feb-24	892.14	302.57	Feb-24	1,197.30	538.85	Feb-24	1,447.31	659.97
Mar-24	879.08	232.48	Mar-24	1,243.84	589.21	Mar-24	1,432.84	660.20
Apr-24	1,042.87	431.48	Apr-24	1,235.73	593.04	Apr-24	1,461.33	660.31
May-24	929.98	310.45	May-24	1,268.52	613.28	May-24	1,486.27	637.27
Jun-24	731.21	221.77	Jun-24	1,237.18	558.37	Jun-24	1,514.01	668.84
Jul-24	767.84	273.85	Jul-24	1,233.92	550.77	Jul-24	1,492.63	641.11
Aug-24	820.16	370.88	Aug-24	1,227.07	543.33	Aug-24	1,477.41	630.79
Sep-24	806.24	243.30	Sep-24	1,238.33	545.75	Sep-24	1,474.71	612.26
Oct-24	817.61	331.15	Oct-24	1,233.13	542.95	Oct-24	1,509.21	652.94
Nov-24	758.99	321.08	Nov-24	1,221.46	546.99	Nov-24	1,484.27	620.52
Dec-24	752.24	406.85	Dec-24	1,231.07	550.49	Dec-24	1,494.67	622.68
Jan-25	881.54	521.36	Jan-25	1,265.60	581.41	Jan-25	1,528.40	637.96
Feb-25	761.71	363.25	Feb-25	1,279.87	588.96	Feb-25	1,566.56	640.13
Mar-25	816.18	411.73	Mar-25	1,269.30	566.45	Mar-25	1,553.43	620.92
Apr-25	783.90	331.71	Apr-25	1,291.93	572.97	Apr-25	1,585.36	640.36
May-25	867.32	404.70	May-25	1,270.06	549.24	May-25	1,588.57	624.95
Jun-25	791.55	304.50	Jun-25	1,244.57	510.51	Jun-25	1,564.97	595.23

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table("OWT"), Set 2
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-2-2 Please indicate how many total customers applied for a Pittsburgh Water Hardship Fund grant from January 2022 to date, disaggregated by month and year, as of the last day of the month/ year.

Please provide this data in a live Excel spreadsheet.

Response: Please see the MS Excel spreadsheet titled, "OWT-2-2, 3 & 5".

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table(“OWT”), Set 2
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-2-3 Please indicate how many total customers received a Pittsburgh Water Hardship Fund grant from January 2022 to date, disaggregated by month and year, as of the last day of the month/ year.

Please provide this data in a live Excel spreadsheet.

Response: Please see the MS Excel spreadsheet titled, “OWT-2-2, 3 & 5”.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table(“OWT”), Set 2
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-2-5 For the Responses to OWT to PWSA 2-3, please additionally disaggregate by service type (e.g. water only; wastewater only; stormwater only; combined, specifying the combined services). Please provide this data in a live Excel spreadsheet.

Response: Please see the MS Excel spreadsheet titled, “OWT-2-2, 3 & 5”.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 2
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-2-4 From January 2022 to present, disaggregated by month and year, as of the last day of the month/ year, please identify how many customers received a Pittsburgh Water Hardship Fund grant, disaggregated by the following Federal Poverty Level (FPL) ranges: 0-50% of the Federal Poverty Level (FPL); 51-100% FPL; 101-150% FPL; and 151-200% FPL.

Please provide this data in a live Excel spreadsheet.

Response: Pittsburgh Water does not have a mechanism in place to track this requested data.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table(“OWT”), Set 2
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-2-6 From January 2022 to present, disaggregated by month and year, as of the last day of the month/ year, please indicate:

- A. How many confirmed low income customers applied for a Pittsburgh Water Hardship Fund grant?
- B. How many confirmed low income customers received a Pittsburgh Water Hardship Fund grant?
- C. How many BDP customers applied for a Pittsburgh Water Hardship Fund grant?
- D. How many BDP customers received a Pittsburgh Water Hardship Fund grant?

Please provide this data in a live Excel spreadsheet.

Response:

- A. Pittsburgh Water does not have a mechanism in place to track the requested data.
- B. Because Hardship Grant recipients must be at or below 200% of the Federal Poverty Level, all Hardship Grant recipients would be considered Confirmed Low Income.
- C. Please see the MS Excel spreadsheet titled, “OWT-2-6.C Hardship Grant Applicants with BDP Status”.
- D. See OWT-2-6.C. Pittsburgh Water does not have a mechanism in place to provide this data for recipients only; however, the PGH2O Cares team attempts to contact by telephone every customer who receives a Hardship Grant and who is not already enrolled in the Bill Discount Program. If Cares is unable to reach a customer by telephone, they send an email to the customer. If neither method of contact is available, Cares mails a letter to the customer.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 2
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-2-8 From January 2022 to present, disaggregated by month and year, as of the last day of the month/year, please indicate:

- A. The average amount of approved Pittsburgh Water Hardship Fund grants;
- B. The total dollar value of approved Pittsburgh Water Hardship Fund grants;
- C. The total grant dollars available through Pittsburgh Water Hardship Fund;
- D. The total administrative costs of Pittsburgh Water Hardship Fund;
- E. Any months in which Pittsburgh Water Hardship Fund was fully depleted.

Please provide this data in a live Excel spreadsheet.

Response:

- A. Please see the MS Excel spreadsheet titled, “OWT-2-8.A and B”.
- B. Please see OWT-2-8.A.
- C. Please see OWT-2-8.A. Pittsburgh Water replenishes the Hardship Fund as the balance gets low. A sufficient balance is maintained to ensure grants can continue to be provided to approved applicants See OWT-2-9.
- D. Dollar Energy Fund manages Pittsburgh Water’s Hardship Fund. They charge an 8.75% Operating Fee of all grants awarded.
- E. One of the settlement terms from the last base rate case required Pittsburgh Water to fund the Hardship Fund using rate dollars. Pittsburgh Water paid the following amounts to replenish the Hardship Fund.
 - a. \$101,250 on 4/1/2024
 - b. \$200,000 on 4/24/2024
 - c. \$200,000 on 7/25/2024
 - d. \$50,000 on 11/21/2024
 - e. \$600,000 on 12/24/2024

Response provided by: Julie A. Mechling, Director of Customer Service / Edward Barca,
Director of Finance for Pittsburgh Water

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 2
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-2-9 For 2022 to present, disaggregated by year, as of the last day of the year, please indicate the total annual funding available for Pittsburgh Water’s Hardship Fund. Please also indicate for 2026, 2027, and 2028, disaggregated by year, what Pittsburgh Water projects as the annual funding levels for its Hardship Fund.

Response:

Hardship Grant funding balances as of:

12/31/2022 - \$213,993

12/31/2023 - \$85,998

12/31/2024 - \$28,670

06/30/2025 - \$193,682

Annual funding levels:

2026 - \$900,000

2027 - \$900,000

2028 - \$900,000

R Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
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Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-2-10 For 2022 to present, disaggregated by year, as of the last day of the year, please indicate the amount of contributions to Pittsburgh Water’s Hardship Fund, and indicate the source(s) these contributions. Please also indicate for 2026, 2027, and 2028, disaggregated by year, what Pittsburgh Water projects as the annual contribution amount to its Hardship Fund, and the source(s) of contribution of these funds.

Response:

Hardship Grant fund contributions:

12/31/2022 - \$4,110; sourced from donations

12/31/2023 - \$5,929; sourced from donations

12/31/2024 - \$1,042,051; sourced from Operating Budget and donations

12/31/2025 - \$100,000; sourced from Operating Budget and donations (forecast)

Annual funding levels:

2026 - \$900,000; sourced from the Operating Budget and donations

2027 - \$900,000; sourced from the Operating Budget and donations

2028 - \$900,000; sourced from the Operating Budget and donations

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
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Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-2-16 Please describe in detail how Pittsburgh Water screens for eligibility for each of the follow of its assistance programs:

- A. BDP;
- B. Hardship Fund;
- C. Arrearage Forgiveness Program;
- D. Line Repair and Water Conservation Program;
- E. Lead Service Line Replacement Program.

Please also provide a copy of all current written policies, procedures, training materials, call scripts, or other documents which discuss how Pittsburgh Water screens for eligibility related to any of these programs.

Response:

- A. If a customer receives a Hardship Grant or an ALCOSAN Clean Water Assistance Fund Grant, or if the account is enrolled in a payment arrangement with qualifying income and the account is found to not be enrolled in the Bill Discount Program, a PGH2O Cares team representative will reach out to the customer to vet them for the Bill Discount Program. Customers are also prompted on the Application for Service to indicate if they are interested in Customer Assistance Programs. In all of these instances, an outbound call is attempted first. If the call is unsuccessful, an email is sent. If neither attempt is successful, Cares mails a letter to the customer. Customers are also screened by Pittsburgh Water representatives in the Contact Center and are transferred to the Cares team when appropriate.
- B. If a customer reaches out to the PGH2O Cares team regarding an account balance and/or to enroll or recertify for the Bill Discount Program, the customer is provided with all of the information necessary to apply for the Hardship Grant, if they have an account balance >\$1.00.
- C. If a customer reaches out to the PGH2O Cares team regarding an account balance and/or to enroll or recertify for the Bill Discount Program, Cares reviews the customer’s account to determine if a payment arrangement with Arrearage Forgiveness is appropriate.
- D. If a customer reaches out to the PGH2O Cares team regarding an account balance or to enroll or recertify for the Bill Discount Program, and the customer’s billing history indicates higher than usual consumption, a Cares representative will explain the Line Repair and Water Conservation Pilot Program to the customer and will complete an

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application if the customer is found to be interested and eligible for the program. Additionally, accounts enrolled in the Bill Discount Program and also exhibiting high water usage, found during the pre-bill editing process, are forwarded to the Cares team for review. A Cares representative will reach out to the customer by telephone to explain the Line Repair and Water Conservation Pilot Program to the customer and will complete an application if the customer is found to be interested and eligible for the program. If the customer cannot be reached by telephone, an email is sent to the customer. A High Consumption Notification is also mailed by the Billing team, which informs the customer of the Line Repair and Water Conservation Program.

- E. The customer is asked by the PGH2O Cares team, during Bill Discount Program enrollment, whether or not they are interested in applying for or receiving more information about Pittsburgh Water’s Lead Service Line Replacement Reimbursement Program. If a customer answers in the affirmative, and if Pittsburgh Water’s records show that the customer has not already had their line lead lines replaced and their service line material has *not* been confirmed as non-lead, then the Bill Discount Program application itself serves as the Lead Service Line Replacement Reimbursement Program application, and the account moves to the Lead Help team for next steps.

Please see OWT-2-16 Attach A through Attach E.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025



Customer Assistance Program Call Script

CSR: Thank you for calling Pittsburgh Water. My name is <CSR Name>. May I have your account number or service address?

Customer: Provides information.

CSR: Thank you; and may I have your name and affiliation to the property?

Customer: Provides information.

CSR: Thank you <use customer's name>. Can you confirm the telephone number associated with the account? [Update any customer contact information that does not match the SAP account.]

Customer: Provides information.

CSR: Thank you; and how can I assist you today?

Customer: Indicates they are calling about Customer Assistance Programs.

CSR: I can certainly assist you with this today. May I place you on a brief hold to review your account?
[Review SAP.]

IF THE CUSTOMER DOES NOT HAVE A PAST DUE BALANCE:

CSR: Thank you for your patience. After reviewing your account, I was able to confirm that your account is current, and your monthly bill is <\$amount of bill due>.

Customer: Explains that they cannot afford the monthly bill.

CSR: PWSA does offer several Customer Assistance Programs which include a monthly bill discount that could lower your monthly bill. Are you interested in hearing more about our Customer Assistance Programs?

Customer: Answers yes.

[Provide direct dial number of 412-255-2457 in case the call is disconnected and transfer the call to PGH2O Cares.]



IF THE CUSTOMER HAS A PAST DUE BALANCE BUT NO ACTIVE TERMINATION:

CSR: Thank you for your patience. After reviewing your account, I was able to confirm that you have an account balance of (\$amount of account balance).

Customer: Explains that they cannot afford to pay the balance.

[Account indicates that the customer is eligible for a payment arrangement.]

CSR: You can establish an income-based payment arrangement on the balance. This would allow you to pay your current monthly bill, in addition to a monthly installment amount, over a period of time. Would you like to set up a payment arrangement at this time?

Customer: Answers yes.

CSR: Can you provide your gross monthly income and number of occupants at the property?

Customer: Provides a response that calculates to a 60-month payment arrangement.

CSR: Based on this information you are eligible for a 60-month payment arrangement which will be <\$installment amount> plus the current monthly charges. Also, your reported income and occupancy indicate that you may be eligible for our monthly bill discount program. If enrolled, you are also eligible to receive a monthly forgiveness credit in the amount of \$40 for every on-time monthly payment. Are you interested in applying for the Bill Discount Program?

Customer: Answers yes.

[Provide direct dial number of 412-255-2457 in case the call is disconnected and transfer the call to PGH2O Cares.]

IF THE CUSTOMER HAS A PAST DUE BALANCE AND AN ACTIVE TERMINATION NOTICE:

CSR: Thank you for your patience. After reviewing your account, I was able to confirm that you have an account balance of <\$amount of account balance>.

Customer: Calling about pending termination.

[Account indicates that the customer is eligible for a payment arrangement.]

CSR: You can establish an income-based payment arrangement on the balance. This would allow you to pay your current monthly bill, in addition to a monthly installment amount, over a period of time and would eliminate the pending termination activity. Would you like to set up a payment arrangement at this time?

Customer: Answers yes.

CSR: Can you provide your gross monthly income and number of occupants at the property?

Customer: Provides a response that calculates to a 60-month payment arrangement.

CSR: Based on this information you are eligible for a 60-month payment arrangement which will be <\$installment amount> plus the current monthly charges. Accepting this arrangement will stop any pending termination activity. Also, your reported income and occupancy indicate that you may be eligible for our monthly bill discount program. If enrolled, you are also eligible to receive a monthly forgiveness credit in the amount of \$40 for every on-time monthly payment. Are you interested in applying for the Bill Discount Program?

[Provide direct dial number of 412-255-2457 in case the call is disconnected and transfer the call to PGH2O Cares.]



IF THE WATER SERVICE IS OFF:

CSR: Thank you for your patience. After reviewing your account, I was able to confirm that the water service is coded as inactive and you have an account balance of <\$amount of account balance>. Can you confirm if the property is currently occupied?

Customer: Calling to have the water service restored at the unoccupied property.

[Account indicates that the customer is eligible for a payment arrangement.]

CSR: You can establish an income-based payment arrangement on the balance to have the water service restored. This would allow you to make a partial payment today for the service to be restored, then you would pay your current monthly bill, in addition to the monthly installment amount, over a period of time. Would you like to set up a payment arrangement at this time?

Customer: Answers yes.

CSR: Can you provide your gross monthly income and number of occupants at the property?

Customer: Provides a response that calculates to a 24-month payment arrangement.

CSR: Based on this information you are eligible for a 24-month payment arrangement which will be <\$installment amount> plus the current monthly charges. You would have to submit <\$first installment amount> before the water service can be restored. Also, your reported income and occupancy indicate that you may be eligible for our monthly bill discount program. If enrolled, you are also eligible to receive a monthly forgiveness credit in the amount of \$40 for every on-time monthly payment. Are you interested in applying for the Bill Discount Program?

[Provide direct dial number of 412-255-2457 in case the call is disconnected and transfer the call to PGH2O Cares.]

IF THERE IS HIGH CONSUMPTION:

CSR: Thank you for your patience. After reviewing your account, I can see that the water consumption indicates that there may be a leak at the property. The high consumption began to register as of <provide date> and as of today water use is still actively registering through the meter. Are you aware of any leaks or causes for the increased consumption?

Customer: Indicates that there is a leak at the property.

CSR: Is the leak visible on an exposed pipe? This may be from a faucet, showerhead, toilet, or valve.

Customer: Confirms that the leak is on exposed plumbing.

CSR: You may be eligible for Pittsburgh Water's Line Repair and Conservation Pilot Program. This program offers free repairs of private side service line leaks on exposed plumbing. To be eligible for the program you must be an active Bill Discount Program customer. Are you interested in applying for the Bill Discount Program and speaking with a PGH2O Cares Analyst regarding the potential leak repair?

[Provide direct dial number of 412-255-2457 in case the call is disconnected and transfer the call to PGH2O Cares.]



CLOSING

CSR: Is there anything else that I can assist you with today?

Customer: Confirms that they have no additional questions.

CSR: Great; and are you satisfied with the information that I have provided today?
[Document customer's response in an Interaction Record.] There is a brief 5-question survey at the end of this call, and we would appreciate your feedback. Again, my name is <CSR Name>, and thank you for calling Pittsburgh Water .

Penn Liberty Plaza I | 1200 Penn Avenue | Pittsburgh, PA 15222

Phone: 412.255.2423 | **Fax:** 412.255.2475 | **Email:** info@pgh2o.com | **Visit:** www.pgh2o.com



CUSTOMER ASSISTANCE PROGRAM CHECKLIST

Checklist: Assistance Program Screening
<p><i>If there is NO past due balance:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> Handle customer initial inquiry per Call Sequencing Model. Ask if customer is interested in hearing more about Customer Assistance Programs and <input type="checkbox"/> transfer to Cares if applicable.
<p><i>If there is a past due balance but NO active termination:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> Handle customer initial inquiry per Call Sequencing Model. <input type="checkbox"/> Determine if customer is eligible for a payment arrangement. Based on income eligibility, ask if customer is interested in applying for Customer <input type="checkbox"/> Assistance Programs and transfer to Cares if applicable.
<p><i>If there is a past due balance AND an active termination notice:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> Review past due balance with customer. <input type="checkbox"/> Determine if customer is eligible for a payment arrangement. Based on income eligibility, ask if customer is interested in applying for Customer <input type="checkbox"/> Assistance Programs and transfer to Cares if applicable.
<p><i>If the water service is OFF:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> Confirm if the property is currently occupied. <input type="checkbox"/> Determine if customer is eligible for a payment arrangement. Based on income eligibility, ask if customer is interested in applying for Customer <input type="checkbox"/> Assistance Programs and transfer to Cares if applicable.
<p><i>If the caller is applying to become a customer:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> Refer customer to the Application for Service online application. <input type="checkbox"/> Explain interest in Customer Assistance Programs can be indicated on the application.
<p><i>If there is high consumption:</i></p> <ul style="list-style-type: none"> <input type="checkbox"/> Provide dates of high consumption. Determine if a leak is present on exposed pipe, from a faucet, showerhead, toilet, or <input type="checkbox"/> valve. <input type="checkbox"/> Determine if customer is eligible for a payment arrangement. Based on income eligibility, ask if customer is interested in applying for Customer <input type="checkbox"/> Assistance Programs and transfer to Cares if applicable.



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R-2025-3055012 (Storm Water)**

Request: OWT-2-24 Does Pittsburgh Water provide customers who are already enrolled in its BDP with a streamlined process to apply for and enroll in its Arrearage Forgiveness Program? If the answer to this question is yes or in the affirmative, please describe this streamlined process, and provide a copy of any current policies, procedures, call scripting, training materials, and any other document which describes this streamlined enrollment process. If Pittsburgh Water provides this streamlined enrollment process, please also provide a copy of any streamlined application for the Arrearage Forgiveness Program for BDP participants.

Response: Please see the response to OWT-2-16.C. Additionally, customers do not need to apply directly to the Arrearage Forgiveness Program. Customers who enroll in the Bill Discount Program and who also enroll in a payment arrangement automatically receive arrearage forgiveness with each on-time payment in an active payment plan. All customers who contact our Customer Service Representatives to enroll in a payment arrangement are warm transferred to the Cares team for enrollment in the Bill Discount Program, providing they are income eligible. All customers who contact the Cares team are screened to determine if a payment plan is appropriate at the time of Bill Discount Program enrollment.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 24, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
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R-2025-3055012 (Storm Water)**

Request: OWT-2-27 From January 2022 to present, disaggregated by month and year, as of the last day of the month/ year, please indicate:

- d. How many customers were removed from the Arrearage Forgiveness Program, disaggregated by reason for removal;
- e. The mean and median dollar amount of forgiveness provided to customers through the Arrearage Forgiveness Program;
- f. The number of participants in the Arrearage Forgiveness Program who had their entire arrearage balance forgiven while enrolled in the Arrearage Forgiveness Program;
- g. The mean arrearage balance for participants enrolled in the Arrearage Forgiveness Program as of the end of each calendar quarter from January 2022 to present;
- h. The mean length of time it would take to completely retire the mean arrearage balance for participants enrolled in the Arrearage Forgiveness Program as of the end of each calendar quarter from January 2022 to present.

Please provide this data in a live Excel spreadsheet.

Response:

Pittsburgh Water does not have a mechanism in place to track the requested data.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: August 7, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 3
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-3-3 See Pittsburgh Water Exhibit JAM-5. From the commencement of the Line Repair and Water Conservation Pilot to present, disaggregated by month and year, as of the last day of the month/ year, please indicate the number of customers service through the Line Repair and Water Conservation Pilot, disaggregated by type of service received (e.g. line repair services, provisions of conservation kits, etc.).

Response: Please see the MS Excel spreadsheet titled, “OWT-3-3 Line Repair and Water Conservation Pilot Program Participants”.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 25, 2025

Line Repair and Water Conservation Pilot Program Participants

Leak Repairs	January	February	March	April	May	June	July	August	September	October	November	December
2023	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	10	15	9	12
2024	10	11	7	10	9	11	8	14	10	8	6	8
2025	13	11	7	11	13	9	7	n/a	n/a	n/a	n/a	n/a

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R-2025-3055012 (Storm Water)**

Request: OWT-3-4

From the commencement of the Line Repair and Water Conservation Pilot to present, disaggregated by year, as of the last day of the year, please indicate:

- A. The total amount of budgeted dollars for the Line Repair and Water Conservation Pilot;
- B. The total amount spent for service delivery (e.g. measures, installation) for the Line Repair and Water Conservation Pilot;
- C. The total amount spent for program administration for the Line Repair and Water Conservation Pilot;
- D. Whether Pittsburgh Water exhausted its budget for the Line Repair and Water Conservation Pilot;
- E. If the Pilot budget was exhausted in a given year, the number of applicants for the Pilot that did not receive services despite being found as eligible.

Please provide this data in a live Excel spreadsheet.

Response: Please see the MS Excel spreadsheet titled, “OWT-3-4.A. and B.”. To date, the original budget has not been exhausted.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 25, 2025

OWT-3-4.A. and B.

Line Repair Pilot Budgeted and Spent Amounts

	2023 Budget	2023 Actual	2024 Budget	2024 Actual	2025 Budget	2025 Actual YTD
Line Repair and Water Conservation Pilot Program	\$396,500.00	\$43,099.00	\$260,004.00	\$108,123.51	\$95,000.00	\$33,186.30

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Request: OWT-3-6 From the commencement of the Line Repair and Water Conservation Pilot to present, disaggregated by month and year, as of the last day of the month/year, please indicate how many Pittsburgh Water customers were denied services for the Line Repair and Water Conservation Pilot, disaggregated by reason of denial. Please provide this data in a live Excel spreadsheet.

Response: Please see MS Excel spreadsheet titled, “OWT-3-6”. Pittsburgh Water’s records reflect only one instance of a customer who applied for the Line Repair and Water Conservation Pilot Program and was discovered to be over-income. That application was received in October 2023. Most of the repairs that were not completed, as itemized in the spreadsheet, were the result of a leak not being covered by the program. These instances were tracked with customer account information but were not tracked with a date. Customers with toilets that could not be replaced due to structural problems with the floor underneath were referred by the PGH2O Cares team to Rebuilding Together Pittsburgh. Customers who were in need of water heater replacements were referred by Cares to their gas/electric company’s programs. If a leak was not accessible to Pittsburgh Water’s contractor, the customer was advised that they could reschedule the appointment once the plumbing was exposed. It is important to note that, in the majority of these instances, other leaks were present in the property and were repaired. One customer was denied additional repairs because they exceeded the \$1,356 per property program limit as of February 2024.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 25, 2025

Reasons Repairs Not Covered
Health and safety issue; not all leaks addressed
Water heater and tub drain leak
Toilet not replaced due to floor condition
Boiler and water heater already tagged for Peoples' ERP
Toilet not replaced due to floor condition
Shower faucet; plumbing not exposed
Tub spout; plumbing not exposed
Could not replace top floor tub faucet; customer-requested parts unavailable
Kitchen faucet commercial grade; traditional faucet will not work
Toilet not replaced due to floor condition; tub/shower parts not exposed
Leaking drain pipe
Leaking drain pipe
Toilet not replaced due to floor condition
Toilet not replaced due to floor condition
Toilet not replaced due to floor condition
Shower faucet of freestanding tub not replaced due to customer-requested style
Bathtub faucets in two bathroom; plumbing not exposed; water heater
Leaking drain pipe
Leaking drain pipe
Lead service line leak; referred to Lead Help
Water heater; referred to gas company program
Leaking drain pipe
Leaking drain pipe; bathtub faucet; plumbing not exposed
Leaking drain pipe
Toilet not replaced due to floor condition
Water heater; referred to gas company program

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Request: OWT-3-7 Please provide the table(s) contained in Pittsburgh Water Exhibit JAM-5 as a live Excel spreadsheet.

Response: Please see the MS Excel spreadsheet titled, “OWT-3-7 JAM-5 Line Repair and Water Conservation Pilot Program Data Tracking”.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 25, 2025

Appointment Date	Completed	Association to Property	Occupancy	FPIG Level	Enrolled in Customer Advantage Portal	\$Parts	\$Labor	Total Cost	Same Period Last Year	Prior 12-Month Average	Post 12-Month Average	First Read Post Repair	Prior 12-Month Billed Amount	Post 12-Month Billed Amount	First Bill Post Repair	Prior 12-Month Payments	Post 12-Month Payments	Prior 12-Month Number of Payments	Post 12-Month Number of Payments	Prior 12-Month Delinquent Amount	Delinquent Amount	Post 12-Month Delinquent Amount
9/7/2023	Yes	OWNER	1	92.51%	NO	\$375.00	\$765.00	\$1,140.00	10	13		7	\$4,799.60		\$215.05	\$50.00		1		\$4,799.60	\$9,595.19	
9/7/2023	Yes	OWNER	2	146.04%	NO	\$25.00	\$765.00	\$790.00	3	6		3	\$2,954.08		\$40.89	\$1,937.22		8			\$1,190.99	
9/15/2023	Yes	TENANT	2	85.19%	NO	\$591.00	\$765.00	\$1,356.00	9	8		8	\$3,054.77		\$242.05	\$1,706.93		7		\$3,054.77	\$3,838.21	
9/13/2023	Yes	TENANT	4	24.00%	NO	\$507.00	\$802.00	\$1,309.00	6	5		2	\$1,728.90		\$124.64	\$573.70		3		\$1,728.90	\$2,314.45	
9/18/2023	Yes	OWNER	6	32.77%	YES	\$35.00	\$358.00	\$393.00	7	7		6	\$2,324.28		\$145.79	\$640.00		3		\$2,324.28	\$2,777.64	
9/19/2023	Yes	OWNER	6	77.46%	NO	\$522.00	\$765.00	\$1,287.00		9		5	\$1,096.99		\$146.41	\$586.30		3			\$510.69	
9/19/2023	Yes	OWNER	4	64.00%	NO	\$230.00	\$839.00	\$1,069.00	10	6		3	\$1,996.36		\$82.64	\$55.22		1		\$1,996.36	\$2,384.32	
9/25/2023	Yes	TENANT	2	91.28%	NO	\$265.00	\$691.00	\$956.00		12		1	\$398.88		\$18.88	\$-		0		\$398.88	\$398.88	
9/25/2023	Yes	OWNER	2	121.70%	NO	\$443.00	\$913.00	\$1,356.00		8		2	\$1,084.71		\$50.76	\$345.53		2			\$439.18	
9/29/2023	Yes	OWNER	1	74.32%	NO	\$517.00	\$839.00	\$1,356.00	2	6		2	\$1,908.61		\$50.76	\$420.53		3		\$420.53	\$1,524.36	
10/3/2023	Yes	OWNER	1	123.46%	NO	\$578.00	\$765.00	\$1,343.00	6	6		5	\$1,995.85		\$146.41	\$2,014.58		13		\$-	\$-	
10/6/2023	Yes	TENANT	4	24.00%	NO	\$220.00	\$654.00	\$874.00	4	5		5	\$1,291.41		\$103.48	\$460.00		4		\$1,291.41	\$1,487.01	
10/6/2023	Yes	OWNER	3	62.75%	NO	\$304.00	\$664.00	\$968.00	6	7		7	\$1,607.06		\$145.79	\$382.30		3		\$1,607.06	\$5,671.62	
10/9/2023	Yes	OWNER	2	139.96%	NO	\$320.00	\$543.00	\$863.00	1	1		2	\$762.25		\$50.17	\$768.44		16		\$-	\$-	
10/18/2023	Yes	OWNER	1	148.15%	YES	\$412.00	\$944.00	\$1,356.00	2	3		2			\$50.76							
10/17/2023	Yes	OWNER	2	94.08%	YES	\$320.00	\$661.00	\$981.00	2	6		3	\$2,260.78		\$82.64	\$1,548.66		10			\$1,224.86	
10/19/2023	Yes	TENANT	1	65.84%	NO	\$517.00	\$839.00	\$1,356.00	4	6		6	\$2,251.86		\$178.29	\$1,743.10		14			\$669.18	
10/19/2023	Yes	OWNER	1	24.86%	NO	\$443.00	\$913.00	\$1,356.00	2	2		2	\$539.52		\$40.04	\$331.16		7			\$-	
10/23/2023	Yes	OWNER	1	103.05%	YES	\$390.00	\$543.00	\$933.00	1	1		1	\$287.24		\$18.88	\$123.13		5			\$-	
10/23/2023	Yes	TENANT	8	17.23%	NO	\$298.00	\$543.00	\$841.00	n/a	7		7	\$564.89		\$145.79	\$-		0			\$-	
10/23/2023	Yes	OWNER	5	74.45%	YES	\$458.00	\$898.00	\$1,356.00	5	5		7	\$2,358.39		\$210.17	\$2,228.94		10			\$317.63	
10/23/2023	Yes	OWNER	1	132.19%	NO	\$320.00	\$533.00	\$853.00	3	2		2	\$149.79		\$15.37	\$901.87		2			\$59.26	
10/25/2023	Yes	OWNER	3	135.16%	NO	\$590.00	\$766.00	\$1,356.00	4	1		1	\$922.88		\$30.44	\$371.14		2			\$732.45	
10/30/2023	Yes	TENANT	3	96.54%	YES	\$495.00	\$580.00	\$1,075.00	4	7		3	\$1,980.02		\$82.64	\$1,598.88		11			\$488.74	
10/31/2023	Yes	OWNER	2	139.92%	NO	\$221.00	\$654.00	\$875.00	3	3		2	\$630.75		\$40.64	\$485.58		11			\$-	
11/3/2023	Yes	OWNER	1	76.54%	NO	\$526.00	\$830.00	\$1,356.00	22	18		1	\$7,189.19		\$20.84	\$220.00		1			\$15,192.04	
11/6/2023	Yes	TENANT	3	135.16%	NO	\$76.00	\$395.00	\$471.00	11	8		6	\$3,142.11		\$179.48	\$1,675.00		4			\$10,258.14	
11/3/2023	Yes	TENANT	4	17.57%	NO	\$527.00	\$790.00	\$1,317.00	11	13		17	\$3,361.70		\$357.31	\$2,292.00		7			\$1,437.39	
11/6/2023	Yes	OWNER	1	74.07%	NO	\$472.00	\$884.00	\$1,356.00	n/a	8		0	\$2,065.29		\$8.47	\$-		0			\$2,001.40	
11/10/2023	Yes	OWNER	1	75.23%	NO	\$544.00	\$812.00	\$1,356.00	5	7		7	\$2,546.73		\$210.17	\$55.50		2			\$1,442.45	
11/14/2023	Yes	Owner	1	57.61%	NO	\$690.00	\$666.00	\$1,356.00	1	1		1	\$617.39		\$19.74	\$660.16		8			\$-	
11/20/2023	Yes	OWNER	1	107.00%	NO	\$520.00	\$836.00	\$1,356.00	0	1		1	\$670.06		\$19.85	\$700.79		12			\$-	
11/21/2023	Yes	OWNER	7	77.94%	YES	\$565.00	\$791.00	\$1,356.00	6	7		8	\$2,643.01		\$243.60	\$2,163.61		9			\$896.94	
11/22/2023	Yes	OWNER	3	0.00%	YES	\$65.00	\$247.00	\$312.00	5	5		3	\$1,733.85		\$84.61	\$1,496.00		12			\$863.42	
12/5/2023	Yes	OWNER	1	143.79%	NO	\$390.00	\$839.00	\$1,229.00	2	3		1	\$982.14		\$19.15	\$637.56		12			\$310.72	
12/5/2023	Yes	OWNER	4	50.52%	NO	\$648.00	\$708.00	\$1,356.00	5	5		4	\$1,086.59		\$65.61	\$618.79		7			\$684.01	
12/6/2023	Yes	OWNER	1	74.81%	NO	\$50.00	\$469.00	\$519.00	2	6		3	\$2,053.43		\$84.34	\$648.46		9			\$1,001.54	
12/11/2023	Yes	OWNER	21	145.19%	NO	\$639.00	\$717.00	\$1,356.00	n/a	5		3	\$614.87		\$30.74	\$599.50		7			\$-	
12/14/2023	Yes	OWNER	6	148.15%	YES	\$665.00	\$592.00	\$1,356.00	2	3		3	\$1,299.08		\$85.35	\$1,338.56		12			\$-	
12/15/2023	Yes	OWNER				\$378.00	\$938.00	\$1,316.00	6	6		8	\$2,044.66		\$248.41	\$1,008.00		4			\$2,160.00	
12/15/2023	Yes	TENANT	9	0.00%	NO	\$396.00	\$518.00	\$1,013.00	2	5		1	\$1,944.75		\$19.85	\$830.74		6			\$1,098.10	
12/19/2023	Yes	TENANT	10	116.80%	NO	\$265.00	\$432.00	\$697.00	6	5		3	\$1,760.82		\$85.77	\$1,127.41		8			\$746.20	
12/20/2023	Yes	OWNER	8	121.52%	NO	\$295.00	\$395.00	\$690.00	2	8		2	\$3,181.01		\$52.74	\$1,385.91		10			\$1,764.73	
12/22/2023	Yes	OWNER	1	92.92%	NO	\$445.00	\$911.00	\$1,356.00	1	1		1	\$435.61		\$21.44	\$482.08		12		\$-	\$-	
12/22/2023	Yes	TENANT	8	96.40%	NO	\$395.00	\$469.00	\$864.00	3	5		3	\$2,199.64		\$86.54	\$1,164.58		11			\$1,164.41	
12/27/2023	Yes	OWNER	1	86.42%	NO	\$145.00	\$543.00	\$688.00	2	2		2	\$673.81		\$52.74	\$503.40		12			\$6.69	
1/2/2024	Yes	OWNER	8	69.37%	NO	\$665.00	\$691.00	\$1,356.00	1	2		1	\$759.10		\$20.13	\$3,221.66		4		\$-	\$484.86	
1/8/2024	Yes	OWNER	2	133.87%	NO	\$169.00	\$543.00	\$712.00	4	5		4	\$2,352.12		\$117.97	\$1,443.73		8			\$1,069.89	
1/9/2024	Yes	OWNER	2	146.04%	NO	\$340.00	\$913.00	\$1,253.00	4	4		1	\$1,344.10		\$20.13	\$350.00		5			\$1,198.55	
1/15/2024	Yes	OWNER	1	131.69%	NO	\$245.00	\$679.00	\$924.00	5	3		2	\$1,280.93		\$54.78	\$718.63		5			\$2,772.86	
1/18/2024	Yes	OWNER	1	87.90%	NO	\$617.00	\$326.00	\$943.00	2	2		2	\$610.86		\$53.29	\$558.36		12			\$-	
1/19/2024	Yes	OWNER	2	63.23%	n/a	\$76.00	\$321.00	\$397.00	4	5		5	\$1,300.02		\$157.01	\$1,263.26		12			\$-	
1/22/2024	Yes	OWNER	1	90.37%	n/a	\$445.00	\$691.00	\$1,136.00	0	1		5	\$402.86		\$161.42	\$170.35		8			\$84.30	
1/22/2024	Yes	TENANT	9	38.78%	NO	\$6.00	\$284.00	\$290.00	n/a	21		6	\$3,297.55		\$126.74	\$188.84		1			\$8,849.95	
1/30/2024	Yes	OWNER	2	137%	NO	\$526.00	\$654.00	\$1,180.00	2	3		1	\$714.53		\$45.03	\$619.75		12			\$100.52	
1/31/2024	Yes	OWNER	1	148%	n/a	\$31.00	\$284.00	\$315.00	1	3		0	\$695.59		\$9.32	\$484.03		11			\$130.84	
2/1/2024	Yes	OWNER	1	108%	n/a	\$139.00	\$395.00	\$534.00	5	7		3	\$2,517.09		\$92.69	\$1,250.00		6			\$1,258.53	
2/5/2024	Yes	TENANT	2	55.36%	NO	\$752.00	\$613.00	\$1,365.00	0	1		2	\$218.22		\$54.91	\$102.35		4			\$-	
2/15/2024	Yes	OWNER	1	98.77%	NO	\$64.00	\$469.00	\$533.00	4	7		4	\$2,633.78		\$126.52	\$1,343.23		10			\$1,993.87	
2/15/2024	Yes	OWNER	4	51.84%	NO	\$395.00	\$691.00	\$1,086.00	1	2		1	\$933.92		\$20.46	\$664.45		7			\$253.11	
2/15/2024	Yes	TENANT	1	109.47%	n/a	\$390.00	\$839.00	\$1,229.00	5	3		6	\$967.62		\$197.23	\$466.79		3			\$1,303.57	
2/15/2024	Yes	TENANT	3	63.72%	n/a	\$470.00	\$543.00	\$1,013.00	n/a	11		5	\$3,241.75		\$161.88	\$-		0			\$4,091.43	
2/16/2024	Yes	OWNER	1	72.75%	NO	\$97.00	\$395.00	\$492.00	4	4		3	\$1,222.12		\$91.17	\$1,360.43		14			\$54.71	
2/20/2024	Yes	OWNER	1	111.55%	NO	\$295.00	\$1,061.00	\$1,356.00	1	3		1	\$908.18		\$20.46	\$508.58		5			\$2,016.07	

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 3
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-3-13 From 2022 to present, disaggregated by month and year, as of the last day of the month/year, please indicate how many customers filed a Leak Credit Request with ALCOSAN which resulted in a reduction of billed Pittsburgh Water charges. Please provide this data in a live Excel spreadsheet.

Response: Please see the MS Excel spreadsheet titled, “OWT-3-13 ALCOSAN Leak Credits”.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 25, 2025

OWT-3-13 ALCOSAN Leak Credits

Month and Year	Count
September-22	66
October-22	66
November-22	26
December-22	19

January-23	49
February-23	26
March-23	16
April-23	60
May-23	80
June-23	23
July-23	80
August-23	22
September-23	72
October-23	22
November-23	11
December-23	53

January-24	21
February-24	5
March-24	29
April-24	17
May-24	40
June-24	6
July-24	59
August-24	2
September-24	26
October-24	35
November-24	4
December-24	42

January-25	9
February-25	55
March-25	4
April-25	34
May-25	33
June-25	23
July-25	14

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 3
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-3-14 Under Pittsburgh Water’s current Arrearage Forgiveness Program (AFP), please answer:

- A. If a customer cannot keep up with their current charges, are they removed from the AFP? Please specifically explain.
- B. If a customer cannot up with their current charges, does Pittsburgh Water provide an opportunity for the customer to remain in the AFP? Please specifically explain. Please also explain any requirements for a customer who does not keep up with their current charges to remain in the AFP.

Response:

- A. Customers are afforded the opportunity to catch-up on defaulted payment plan amounts through the Collections process to maintain their enrollment in the Arrearage Forgiveness Program. When an Arrearage Forgiveness Program enrollee calls in response to a collection notice, Pittsburgh Water Customer Service Representatives advise them of the amount due to catch-up on their payment plan.
- B. If an Arrearage Forgiveness Program enrollee has defaulted on a payment plan and fails to pay the amount due to catch-up and reinstate the plan, their plan becomes defaulted, and they are removed from the Arrearage Forgiveness Program. If they have not exceeded the regulated number of payment plans, the customer may apply for new payment arrangements and reinstate their enrollment in the Arrearage Forgiveness Program.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 25, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 3
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-3-17 Please specifically describe any requirement for customers who enroll in the AFP to enter into a payment arrangement, including but not limited to:

- A. The length and terms of payment arrangements which are offered to customers who enter the AFP;
- B. Whether enrollment in the BDP satisfies the requirement that AFP participants enter into a payment arrangement.

Please also provide a copy of all current internal policies, procedures, standard operation procedures, or other documents which describes the length and/or terms of payment arrangements which are offered to customers enrolling in the AFP.

Response:

- A. The length and term of payment plans in the Arrearage Forgiveness Program are driven by the customer’s household income inputted into the Commission’s payment plan calculator.
- B. Enrollment in the Bill Discount Program and an active payment plan are the precursors for enrollment into the Arrearage Forgiveness Program.

See **attachment** OWT-3-17 Installment Plans Contact Center Training Jan 21 2025.

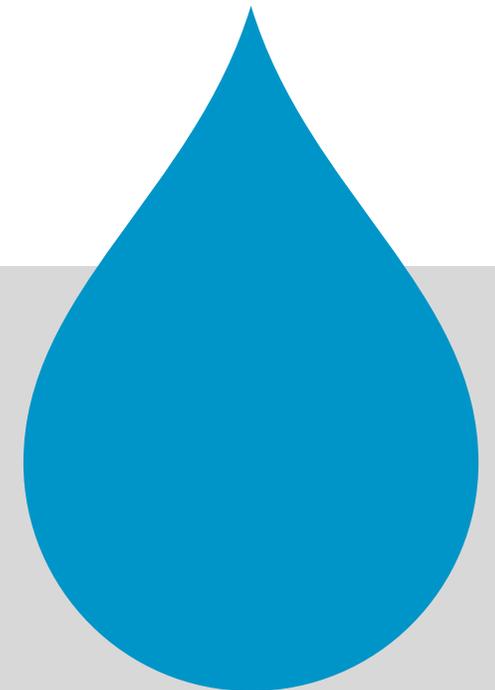
Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 29, 2025



Installment Plans

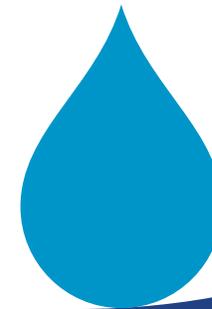
Contact Center Training
January 21, 2025



Definition

The PUC defines an installment plan as:

An agreement whereby a customer who admits liability for billed service is permitted to amortize or pay the unpaid balance of the account in one or more payments.



Customers

Confirm that the person you are speaking with is listed on the account as either the owner or the tenant:

Owner:

Or

Tenant

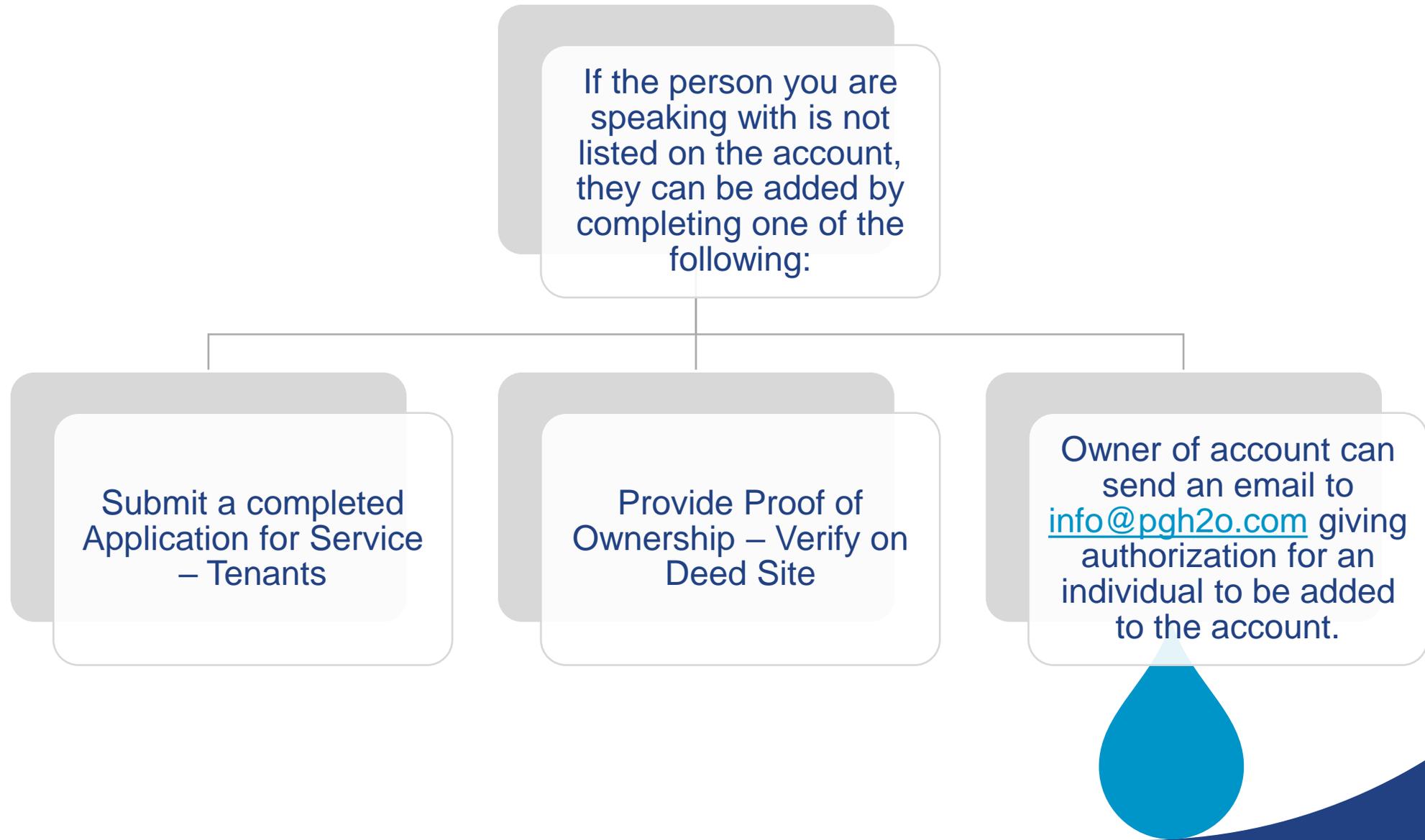
The screenshot displays a web interface for managing a utility account. The main section is titled "More Fields: Premise (5079584):" and contains several data fields. Two green arrows point to the "Current Account" and "Owner" fields, which are "SUSAN SCHACHT" and "MICHAEL SCHACHT II" respectively. Other visible fields include "House No/Street/Supplement" (3120 WESTBORN ST), "Postal Code/City" (15212 PITTSBURGH), "Number of Persons" (000), "Premise Type" (Single: Single family residential), "Premise" (5079584), and "Avg. Consumption" (EST). The interface also includes a "Confirm" button and a "Result List" link at the bottom.

House No/Street/Supplement:	3120	WESTBORN ST
AKA Address:		
Postal Code/City:	15212	PITTSBURGH
Number of Persons:	000	
Premise Type:	Single: Single family residential	
Premise:	5079584	
Current Account:	SUSAN SCHACHT	
Owner:	MICHAEL SCHACHT II	
Avg. Consumption:		EST

Confirm: Unconfirm

Interaction Overview [Result List](#)

Customer Authorization



Installment Plans

- If a customer is delinquent on their payment arrangement, Pittsburgh Water will begin the termination process from the beginning.
- When a customer receives a termination notice, they have the ability to bring their payment arrangement current to cancel the pending termination of service.
- A payment arrangement is not considered deactivated until the water service is terminated.



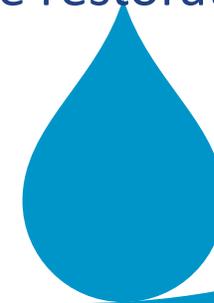
Installment Plans (continued)

- If a payment plan is established for an account that has not received a shut-off notice, no payment is required at this time. The balance is included in the plan and is not yet due. Customers will receive a new bill and will be responsible for paying the SPA amount as well as the CMC (current monthly balance) upon receipt of the bill. No lock is required.
- If a customer receives a shut-off notice (any notice 37, 10 or 3) , ensure that you either establish a Special Payment Arrangement (SPA) or inform them that they must pay the past due amount (dunning amount) by the due date stated on notice. Paying current charges will not stop a termination, it is the past due amount (dunning) that determines the shut.
 - * If they are not eligible for the plan or exceeded their allotted number of plans, they will need to catch up on the plan or pay the dunning amount to cancel the termination. CSRs will need to look in the dunning history for the past due amount.
- If a customer is disputing the bill, add the dispute lock to the account and it will stop any collection activity.



Installation Plans (continued)

- If the customer has a termination notice and the CSR creates a payment plan for the account, the current monthly charge plus SPA amount will need to be paid by SPA plan due date, no charges/payment due at this time. If the shut is pending, then service order needs to be cancelled.
- If customer has been terminated, and no SPA established. CSR can create a payment plan for account, if eligible. Reference 2025 Collection Fact Sheet for monthly terms. The customer must pay the 1st installment payment of the SPA. (Remember they are paying their catch-up amount), Once the payment is verified. Service Order for Restoration is created.
- If an unlisted Tenant has received a shut notice or is already shut, advise Customer to make an unlisted tenant payment of the previous months bill. Once payment is confirmed, place a 30 – day tenant payment lock and schedule restoration if already shut.



Second Installment Plan

- Customers are eligible for a maximum of TWO payment arrangements, unless the customer has experienced a life changing event, such as job loss, change in residents, or income change.
- If a customer requests a second payment arrangement, follow the same steps to calculate the payment arrangement, and update the locks.



Second Installment Plan List

EMILY SLAGEL / 2095958
 1514 BUENA VISTA ST / PITTSBURGH PA 15211

Disconnection Completed

Installment Plan List: 1174475/2095958



[Change Search Criteria](#)

St...	Contract Acct...	Installment...	Installment ...	Open Amount	Total Due	Start Date	End Date	Inst...	Deactivated	Explanation
	2095958	40000004840	233.54	233.54	0.00	06/12/2023	05/10/2028	060	<input type="checkbox"/>	
	2095958	40000004827	233.54	0.00	0.00	03/13/2023	02/14/2028	060	<input checked="" type="checkbox"/>	Renegotiation



Calculating an Installment Plan

Installment Plans are offered to Residential and Commercial Customers. Refer to the Collection Fact Sheet to see the months available.

The classification can be confirmed under the Premise Type.

More Fields Premise (5070935): [More Fields](#)

House No/Street/Supplement:	1514	BUENA VISTA ST
AKA Address:		
Postal Code/City:	15212	PITTSBURGH
Number of Persons:	000	
Premise Type:	Single: Single family residential. ←	
Premise:	5070935	
Current Account:	EMILY SLAGEL	
Owner:		
Avg. Consumption:		EST

Confirm Unconfirm

More Fields Premise (5030089): [More Fields](#)

House No/Street/Supplement:	64...	FRANKSTOWN AVE
AKA Address:		
Postal Code/City:	15206	PITTSBURGH
Number of Persons:	000	
Premise Type:	Commercial: Restaurants-churches-club ←	
Premise:	5030089	
Current Account:	GREYHOUND PETROLEUM CO	
Owner:		
Avg. Consumption:		2.89

Confirm Unconfirm

Calculating an Installment Plan (continued)

Click on Account Balance Overview to see the open balance

EMILY SLAGEL / 2095958
1514 BUENA VISTA ST / PITTSBURGH PA 1521:

Disconnection Completed

Account Overview: 1174475/2095958, All Items 🖨️ ?

Account Balance Overview Change Search Criteria

Account History
Open Item List
Installment Plan Calculator
Installment Plan List
Account History Report

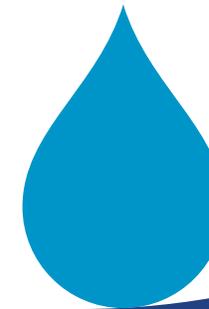
Dunning Procedure...	Coll. Strategy - Text	Contract	Description	Contract Acct...	Open Amount	Amount Due	Lock
	Residential Collecti...		EMILY SLAGEL	2095958	233.54	0.00	
Total					233.54	0.00	

Balance Overview Lock Credit Memo Installment Plan

Calculating an Installment Plan (continued)

Click on Account Balance to access the Installment Plan Calculator

The screenshot shows a web application interface for account management. On the left is a navigation menu with the following items: Agent Dashboard, Apps, Recent Items, Identification, Overview, Interaction Record, Account Balance (highlighted in yellow), Billing Overview, Meter Readings, Payments, Service Orders, Move In/Move Out, Owner Allocation, Collections Process, and Correspondence. The main content area displays account information for 'EMILY SLAGEL / 2095958' at '1514 BUENA VISTA ST / PITTSBURGH PA 15212', with a 'Disconnect' button. Below this is an 'Account Overview: 1174475/2095958, All Items' section. A dropdown menu is open over the 'Account Balance' menu item, listing options: Account Balance Overview, Account History, Open Item List, Installment Plan Calculator (highlighted in yellow), Installment Plan List, and Account History Report. At the bottom of the main content area, there are buttons for 'Balance Overview', 'Lock', 'Credit Memo', and 'Installment Plan'.



Calculating an Installment Plan (continued)

In the Installment Plan Income Calculator

- Enter the Customer's Gross Monthly Income. (Commercial - \$0)
- Number of Residents in the Household. (Commercial - 0)
- Hit Execute

Installment Plan Calculator

< **SAP** Installment Plan Income Calculator

Save as Variant... More ▾

* Contract Account:

Gross Monthly Income:

* Household Residents:

Proposed Results

Total Amount Owned:

Poverty Line Level %:

Number of Installments:

Override Calculations:

Monthly Payment Installment:

First Payment Date:

Execute



Calculating an Installment Plan (continued)

The calculator will automatically provide the following information:

- Total Amount Owned
- Poverty Line Level
- Number of Payments
- Monthly Payment
- First payment Date

Installment Plan Calculator

< **SAP** Installment Plan Income Calculator

Save as Variant... More ▾

* Contract Account: 

Gross Monthly Income:

* Household Residents:

Proposed Results

Total Amount Owned: ←

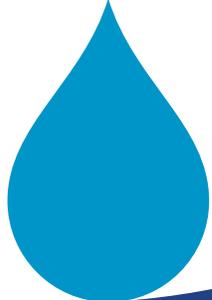
Poverty Line Level %: ←

Number of Installments: ←

Override Calculations:

Monthly Payment Installment: ←

First Payment Date: ←





Initiating an Installment Plan

Once the customer has accepted the terms of the payment arrangement

- Click Execute

The screen will show the installment plan has been created for the account with a plan number.

Installment Plan Calculator

< **SAP** Installment Plan Income Calculator

Save as Variant... More ▾

* Contract Account:

Gross Monthly Income:

* Household Residents:

Proposed Results

Total Amount Owned:

Poverty Line Level %:

Number of Installments:

Override Calculations:

Monthly Payment Installment:

First Payment Date:

Execute

Installment Plan Calculator

< **SAP** Installment Plan Income Calculator

🔍 📄 📊 📈 📉 📊 📈 📉 More ▾

Table Row	Contract Account	
1	2095958	Installation plan created for contract account 000002095958 with plan 040000004840

Installment Plan Notification



05/11/2023

EMILY SLAGEL
1514 BUENA VISTA ST
PITTSBURGH PA 15212

Customer Account No: 2095958

RE: 1514 BUENA VISTA ST

SPECIAL PAYMENT ARRANGEMENTS



Dear EMILY SLAGEL:

The Pittsburgh Water and Sewer Authority has agreed to allow you to pay your balance in the amount of \$233.54 over a 60 month period. The monthly installment amount of \$3.80 should be remitted with your current monthly charges prior to the due date, beginning 06/12/2023.

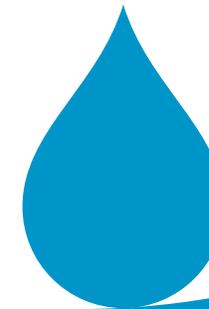
Failure to comply with this payment plan may result in additional collection procedures and/or termination of water service.

If you have any questions, please contact Customer Service at 412.255.2423 and choose Option #5 or via email to info@pgh2o.com. Office hours are Monday through Friday from 8:00 am to 6:00 pm. It is PWSA's mission to support our region by protecting public health and the environment through the delivery of safe and reliable water services with a commitment to future generations.

Sincerely,

Customer Service

Special Payment Arrangement letter will automatically be generated. This letter details the terms of the arrangement and is sent to customer following the acceptance of the arrangement.



Documenting an Installment Plan

Once the customer has accepted the terms of the payment arrangement the account locks must be added, and the account noted.

Account notes should include:

- Name of the person you spoke with
- Relationship to the property
- Monthly gross income
- Number of residents in Household
- Customer's acceptance.
- Category: ex: Installment Plans
- Reason: ex: Renegotiate
- Click Save

Interaction Record*

Overview | Organizational Data | Partner

Change History: Transaction History

Category/Reason: Installment Plans | Renegotiate Plan

Channel/Priority: Telephone call | Medium

Contract Account/Premise: 2095958 | 0005070935

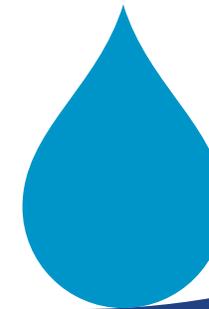
Direction: No Entry

Notes

Type: Note | English

Emily called in about balance \$233.54.
Had to renegotiate the current Installment plan 40000004827 deactivated: business agreement 2095958
Spoke with Emily owner ref New Installment Plan
Created New installment plan on 05/11/23 - customer accepted the terms.

Import Scratch Pad



How to Deactivate an Installment Plan

EMILY SLAGEL / 2095958
1514 BUENA VISTA ST / PITTSBURGH PA 15211

Disconnection Completed

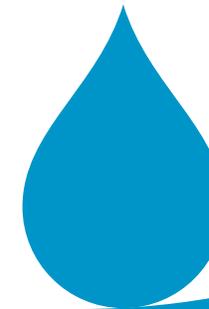
Installment Plan List: 1174475/2095958

Change Search Criteria

Search Deactivate Link to Interaction Record

St...	Contract Acct...	Installment...	Installment ...	Open Amount	Total Due	Start Date	End Date	Inst...	Deactivated	Explanation
000	2095958	40000004827	233.54	233.54	7.60	03/13/2023	02/14/2028	060	<input type="checkbox"/>	

- Click Installment List
- Select the Installment Plan
- Click Deactivate Button



How to Deactivate an Installment Plan (continued)

Installment Plan: 40000004827 

Sta...	Amount	Open Amount	Posting Date	Net Due Date	Clearing Document	Clearing Date	Item Text
●○○	3.80	3.80	02/10/2023	03/13/2023			2000.00 ,4 ,129.7...
●○○	3.80	3.80	02/10/2023	04/12/2023			2000.00 ,4 ,129.7...
○○○	3.80	3.80	02/10/2023	05/12/2023			2000.00 ,4 ,129.7...
○○○	3.80	3.80	02/10/2023	06/12/2023			2000.00 ,4 ,129.7...
○○○	3.80	3.80	02/10/2023	07/12/2023			2000.00 ,4 ,129.7...
○○○	3.80	3.80	02/10/2023	08/14/2023			2000.00 ,4 ,129.7...
○○○	3.80	3.80	02/10/2023	09/12/2023			2000.00 ,4 ,129.7...
○○○	3.80	3.80	02/10/2023	10/12/2023			2000.00 ,4 ,129.7...

Deactivate

Installment Plan Number: 40000004827

Deactivation Reason: **Deactivated by Dunning Run** ▼

Print Parameter: **No printing** ▼

Reverse Interest:

Go X Cancel

Deactivated by Dunning Run

Renegotiation

Supervisor Approval

Leak

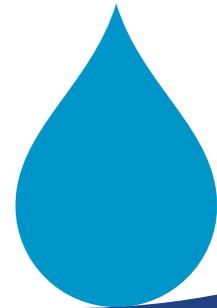
Change of income

Household size

PFA




- Select the reason why you are deactivating the installment plan
- Select Go



How to Deactivate an Installment Plan (continued)

You will see the Deactivated button checked and the explanation you selected.

Installment Plan List: 1174475/2095958



[Change Search Criteria](#)

St...	Contract Acct...	Installment...	Installment ...	Open Amount	Total Due	Start Date	End Date	Inst...	Deactivated	Explanation
○○○	2095958	40000004827	233.54	0.00	0.00	03/13/2023	02/14/2028	060	<input checked="" type="checkbox"/>	Renegotiation



How to Override Installment Plan

BRENDAN RENNE / 2124453
315 VIRGINIA AVE / PITTSBURGH PA 15211 Alerts

Clear Interaction End

Installment Plan Calculator

SAP Installment Plan Income Calculator

Save as Variant... More ▾ Exit

Contract Account: 2124453

Gross Monthly Income: 2,000.00

Household Residents: 4

Proposed Results

Total Amount Owed: 252.47

Poverty Line Level %: LEVEL_01

Number of Installments: 6

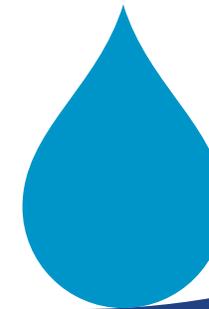
Override Calculations: [v]

Monthly Payment Installment: 4.21

First Payment Date: 11/01/2023

Execute

- Enter the Customer's Gross Monthly Income. (Commercial - \$0)
- Number of Residents in the Household. (Commercial - 0)
- Hit Execute
- Enter the Check the Override Button.
- Enter the appropriate number of months needed. (Commercial and Landlords properties - 6 months.)
- Select Execute



Protection from Abuse Orders

If a customer has a protection from abuse order or a court order issued by a court of competent jurisdiction in the Commonwealth, which provides clear evidence of domestic abuse, payment arrangements will be based on their individual circumstances, regardless of their previous payment arrangement history. Payment arrangements may also exceed the standard term lengths based on the customer's individual facts and circumstances.



Protection from Abuse Orders

If the customer has exhausted their two-installment plan limit, the customer may dispute the installment plan request denial or file an Informal Complaint with the PUC regarding the installment plan request. The internal dispute process should be followed accordingly for disputes related to installment plan requests.



Installment Plan When Water is Off

If the water service is off, payment arrangements terms are as follows:

- If the customer's income is above 300% of the Federal Poverty level, the customer is required to pay the past due balance in full, unless they have experienced a life event that would permit a 3-month payment arrangement.
- If the customer's income is between 150% and 300% of the Federal Poverty level, the customer would be eligible for a 12-month payment arrangement and is required to pay the first installment (1/12th of the balance) to have the water service restored.
- If the customer's income is below 150% of the Federal Poverty level, the customer would be eligible for a 24-month payment arrangement and is required to pay the first installment (1/24th of the balance) to have the water service restored.



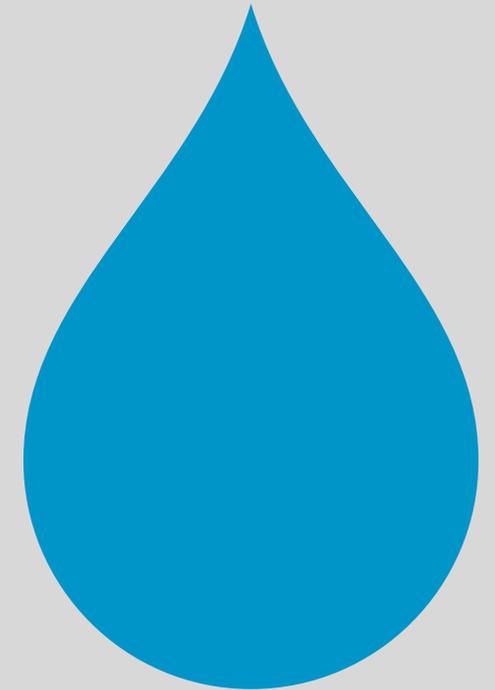
Installment Plans Q&A

- When there is a shut off notice and the customer is unable to make the payment, will the CSR need to set up a SPA? **YES, if customer is eligible** and direct them to CARES or Customer Assistance Programs at PGH2O.com
- Will setting up a SPA stop an active shut notice termination? **YES – Cancel SO if one has been created for shut.**
- Is the SPA amount due immediately to avoid the shut off? **NO – no money is warranted unless account is already shut.** We cannot ask for money up front when setting up an income-based payment plan.
- Is there an automatic lock placed on an account, if you establish a payment plan? **NO – no need for lock** – a SPA automatically cancels the dunning process in the back office.
- Can a short-term lock (7- day) be placed on a customer’s account to ensure it will not be shut after payment has been confirmed? **YES** – follow guidelines.



End Slide

Thank you



**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 3
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-3-23 Can Pittsburgh Water customers pay their bills in cash? If so, please list all of the ways that they can do so and whether there is a fee associated with any such method whether that fee is imposed by Pittsburgh Water or a third-party.

Response: Yes; Pittsburgh Water customers may pay in cash at each of the retailers listed on the bill coupon, which is on page two of the .pdf document, “Pittsburgh Water Exhibit JAM-2 Sample Customer Bill With Rebranding-New Due Date-Inserts”. The transaction fee is \$1.49.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 25, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 3
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-3-24 Reference Pittsburgh Water Statement No. 2 (Barca) at 26 concerning Pittsburgh Water’s proposal to shift the cost of paying by credit or debit card to customers in this rate case. Please provide the following information:

- A. What is the cost per credit card transaction that customers will be responsible for if Pittsburgh Water’s proposal is implemented?
- B. What is the cost per debit card transaction that customers will be responsible for if Pittsburgh Water’s proposal is implemented?
- C. How many payments were made by residential customers via credit card by month for each year from January 2022 to present?
- D. How many payments were made by residential customers via debit card by month for each year from January 2022 to present?
- E. How many payments were made by confirmed low income customers by credit card by month for each year from January 2022 to present?
- F. How many payments were made by confirmed low income customers by debit card by month for each year from January 2022 to present?

Please provide this data in a live Excel spreadsheet.

Response:

Please see the MS Excel spreadsheet titled, “OWT-3-24 Payment Details Jan 2022-June 2025”. Pittsburgh Water currently offers free payment channels for customers through ACH and paper checks mailed to our lockbox with PNC Bank. It is Pittsburgh Water’s goal to enroll all customers in ACH payments in the future, which will save all ratepayers credit card fees, credit card interest charges, fees/labor for processing paper checks, and paper waste.

- A. \$2.01/transaction for 2026 and 2027; this rate is in our contract with our electronic bill presentment, payment, bill printing, and mailing supplier, Kubra.
- B. \$2.01/transaction for 2026 and 2027; this rate is in our contract with our electronic bill presentment, payment, bill printing, and mailing supplier, Kubra.

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 3
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

- C. Please see the MS Excel spreadsheet titled, “OWT-3-24 Payment Details Jan 2022-June 2025” for debit card and credit card transactions per month for residential customers. Pittsburgh Water is unable to disaggregate the proportion of residential credit card and debit card payments but has provided a breakout of the total of the two combined. Any negative values present for other transactions are the result of a timing issue where transactions are made in one month, but the charges are not posted to the accounting system until the next month.

- D. Please see OWT-3-24.C.

- E. Pittsburgh Water does not have a reporting mechanism in place to track this.

- F. Pittsburgh Water does not have a reporting mechanism in place to track this.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 25, 2025

FEES

Sum of Amount in CC Crcy	Column Labels												Grand Total
Row Labels	001	002	003	004	005	006	007	008	009	010	011	012	
2022	34,146.45	33,430.80	41,761.20	34,214.70	38,586.60	38,619.75	36,817.95	33,446.40	34,320.00	34,265.40	34,944.00	35,759.10	430,312.35
2023	33,733.05	35,907.30	42,010.80	35,893.65	42,995.55	33,746.70	35,119.50	43,750.20	37,555.05	39,313.95	39,540.15	37,982.10	457,548.00
2024	42,287.70	39,282.75	41,847.00	43,017.00	43,802.85	38,894.70	43,988.10	42,981.90	40,443.00	47,488.35	42,589.95	43,288.05	509,911.35
2025	42,862.95	42,777.15	45,329.70	47,948.55	46,755.15	43,011.15							268,684.65
Grand Total	153,030.15	151,398.00	170,948.70	161,073.90	172,140.15	154,272.30	115,925.55	120,178.50	112,318.05	121,067.70	117,074.10	117,029.25	1,666,456.35

of Residential Transactions

Sum of Amount in CC Crcy	Column Labels												Grand Total
Row Labels	001	002	003	004	005	006	007	008	009	010	011	012	
2022	17,511	17,144	21,416	17,546	19,788	19,805	18,881	17,152	17,600	17,572	17,920	18,338	220,673
2023	17,299	18,414	21,544	18,407	22,049	17,306	18,010	22,436	19,259	20,161	20,277	19,478	234,640
2024	21,686	20,145	21,460	22,060	22,463	19,946	22,558	22,042	20,740	24,353	21,841	22,199	261,493
2025	21,981	21,937	23,246	24,589	23,977	22,057	-	-	-	-	-	-	137,787
Grand Total	78,477	77,640	87,666	82,602	88,277	79,114	59,449	61,630	57,599	62,086	60,038	60,015	854,593

Total Transactions

Sum of Amount in CC Crcy	Column Labels												Grand Total
Row Labels	001	002	003	004	005	006	007	008	009	010	011	012	
2022	17,129	17,553	21,335	17,713	19,258	20,474	19,904	16,970	18,106	17,969	18,453	18,384	223,248
2023	18,476	19,493	22,075	19,343	23,906	22,303	18,357	23,037	19,791	21,829	19,715	20,172	248,497
2024	22,581	20,211	21,967	23,209	22,692	20,161	23,854	22,537	21,459	24,801	21,890	23,989	269,351
2025	22,620	22,308	23,760	25,665	24,791	23,097							142,241
Grand Total	80,806	79,565	89,137	85,930	90,647	86,035	62,115	62,544	59,356	64,599	60,058	62,545	883,337

of Other Transactions

Sum of Amount in CC Crcy	Column Labels												Grand Total
Row Labels	001	002	003	004	005	006	007	008	009	010	011	012	
2022	(382)	409	(81)	167	(530)	669	1,023	(182)	506	397	533	46	2,575
2023	1,177	1,079	531	936	1,857	4,997	347	601	532	1,668	(562)	694	13,857
2024	895	66	507	1,149	229	215	1,296	495	719	448	49	1,790	7,858
2025	639	371	514	1,076	814	1,040	-	-	-	-	-	-	4,454
Grand Total	2,329	1,925	1,471	3,328	2,370	6,921	2,666	914	1,757	2,513	20	2,530	28,744

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 3
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-3-27 Reference Pittsburgh Water Statement No. 2 (Barca) at 24-25 referencing the “Private Water Line and Sewer Lateral Insurance Program” that Pittsburgh Water recently implemented. Please answer the following questions:

- A. Please provide a copy of the contract between Pittsburgh Water and this insurance provider.
- B. Has this program been marketed to customers? If so, please provide any and all marketing material that has been sent to customers. If not, when will the program commence?
- C. How many customers have signed up for the program as of the date of your response to these interrogatories?
- D. What is the monthly cost of the program for a residential customer?
- E. Will Pittsburgh Water be billing for these services on its bills?
- F. Does Pittsburgh Water consider any such insurance products to be basic services such that non-payment could result in termination of utility service?
- G. Does Pittsburgh Water have a payment prioritization policy if a customer makes a partial payment rather than a full payment? If so, please provide a copy of that policy and describe the order of payment from first to last.

Response:

A. Please see the .pdf titled, “OWT-3-27.A Marketing Services Agreement with American Water Resources May 2025”.

B. The optional line warranty program for residential customers will be digitally launched on July 28, 2025 with a print launch slated for September.

C. N/A

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
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Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

D.



Protection Plan	Monthly Pricing through July 2026	Coverage
Exterior Water Line Protection Program	\$5.55	\$25,000 per occurrence <ul style="list-style-type: none"> \$12,500 private water line \$12,500 public sidewalk/roadway \$1,000 reimbursement for pavement and structure restoration No annual limit; No service fees
Exterior Sewer Line Protection Program	\$9.45	\$25,000 per occurrence <ul style="list-style-type: none"> \$12,500 private sewer line \$12,500 public sidewalk/roadway \$1,000 reimbursement for pavement and structure restoration No annual limit; No service fees
Exterior Water and Sewer Line Protection Program (Combo)	Year 1 Promo: \$9.99 (\$5.01 in savings) Year 2 at renewal: \$13.50 (\$1.50 in savings)	See individual coverages above
In-Home Emergency Plumbing	\$6.10	\$1,800 per occurrence Unlimited service calls No service fees
Exterior Water, Sewer Line and In-Home Protection Program (Triple)	Year 1 Promo: \$16.99 (\$4.11 in savings) Year 2 at renewal: \$19.60 (\$1.50 in Savings)	See individual coverages above

E. No.

F. No.

G. Please see OWT-3-27.E.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 25, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 3
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-3-34 Reference Pittsburgh Water Statement No. 4 (Mechler) at 10.

- A. Please identify what Consent Decree negotiations Mr. Mechler is referring to, whether they involve Pittsburgh Water or ALCOSAN or both, and when PWSA expects these negotiations to conclude.

- B. Please identify what specific aspects of the Damaged Wastewater Lateral Pilot Program are impacted by the ongoing Consent Decree negotiations.

- C. Has Pittsburgh Water estimated the cost of the Damaged Wastewater Lateral Pilot Program?

- D. Please specify what steps Pittsburgh Water took to comply with its settlement obligations to pursue a Damaged Wastewater Lateral Program.

- E. What specific resources were “unavailable” to Pittsburgh Water that were required for implementation of this program?

Response:

- A. Pittsburgh Water and the City of Pittsburgh are negotiating a consent decree concerning the control of combined sewer overflows (CSOs) and sanitary sewer overflows (SSOs) with the United States Department of Justice (representing the United States Environmental Protection Agency), the Pennsylvania Department of Environmental Protection, and the Allegheny County Health Department (collectively, the Agencies). The consent decree would resolve the Agencies’ claims asserted under the federal Clean Water Act, the Pennsylvania Clean Streams Law, and Article XIV of the Rules and Regulations of the Allegheny County Health Department. The Allegheny County Sanitary Authority is not a party to these negotiations. Pittsburgh Water cannot at this time estimate a timeframe for the conclusion of the negotiations.

- B. With the unknown requirements and costs of the Consent Decree, Pittsburgh Water cannot allocate resources to the Damaged Wastewater Lateral Pilot Program at this time.

- C. Pittsburgh Water has not assessed the estimated cost of the Damaged Wastewater Lateral Pilot Program. \$500,000 was originally allocated from the City of Pittsburgh via the ARPA funds; however, that was later rescinded.

- D. Pittsburgh Water has taken numerous steps to pursue a Damaged Wastewater Lateral Program in compliance with its prior settlement obligations. An outline of these steps is provided below:

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
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Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

- a. In the Settlement of its 2021 Rate Case (Docket Nos. R-2021-3024773 et al.), Pittsburgh Water agreed to file a plan with the PUC for approval to repair and replace privately owned damaged sewer laterals at Pittsburgh Water’s expense. See 2021 Rate Case Settlement at ¶ 9.E.6.
 - b. On March 18, 2022, Pittsburgh Water filed a Petition with the PUC seeking approval of its Damaged Wastewater Sewer Lateral program, consistent with the 2021 Rate Case Settlement (Docket Nos. P-2022-3031586 and R-2022-3031597).
 - c. On December 29, 2022, the PUC entered an Order denying Pittsburgh Water’s DWSL Petition without prejudice.
 - d. The Settlement of Pittsburgh Water’s 2023 Rate Case (Docket Nos. R-2023-3039919 et al.) did not include terms addressing damaged wastewater laterals. However, Pittsburgh Water explained in testimony that it was developing a comprehensive proposal that it planned to file with the PUC seeking authority to implement a Pilot Infiltration and Inflow Reduction Program and Damaged Wastewater Lateral Program for eligible low-income customers. (See Pittsburgh Water 2023 Rate Case, Pittsburgh Water St. No. 4 (King) at 21-27.)
 - e. To date, Pittsburgh Water has not yet sought authority for Pilot Infiltration and Inflow Reduction Program and Damaged Wastewater Lateral Program for the reasons discussed in my direct testimony in this rate case (Pittsburgh Water St. No. 4 (Mechler) at 10).
- E. Pittsburgh Water did not have the human and financial capital to dedicate to initiating and implementing the Program.

Response provided by: Kate Mechler, P.E., Director of Engineering and Construction, WW, SW, and GI Systems

Date Response provided: July 25, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 3
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-3-42 How many households enrolled in the BDP as of June 30, 2025, had an average annual usage of:

- A. Less than 1,000 gallons per month.
- B. 1001-2000 gallons per month.
- C. 2001-3000 gallons per month.
- D. 3001-4000 gallons per month.
- E. 4001-5000 gallons per month.
- F. 5001-6000 gallons per month.
- G. Over 6000 gallons per month.

Please provide this data in a live Excel spreadsheet.

Response:

See OWT-3-42 (excel).

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: August 18, 2025

OWT-3-42

Average Annual Usage by Band BDP Households

Year	>=0 and <=1	>1 and <=2	>2 and <=3	>3 and <=4	>4 and <=5	>5 and <=6	>6
2022	737	1072	945	670	473	242	457
2023	694	1130	1076	745	533	325	461
2024	793	1236	1120	840	573	342	526
2025	1042	1152	1028	777	574	372	600

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 4
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-4-2 Please describe in detail what information is provided to customers who submit a medical certificate about their right to renew medical certificates, and under what circumstances this information is provided. Please also provide a copy of any policies, procedures, call scripts, training materials, or other documents which describe what information Pittsburgh Water provides to customers related to accessing and renewing medical certificates.

Response:

When a customer’s medical is approved, Collections personnel contact the customer by telephone to advise of the approval, remind the customer of their responsibility to pay current charges moving forward, and explain the medical renewal process. An interaction record is added to the account, documenting the medical approval and subsequent conversation. Please also see the .pdf titled, “OWT-4-2 Medical Certificates Customer Service Training Feb 2023”.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 31, 2025



Medical Certificates

Customer Service Training

February 2023

Definition

The Pennsylvania Public Utility Commission (PA PUC) defines a “Medical Certificate” as:

A written document, in a form approved by the Commission:

(1) certifying that a customer or member of the customer’s household is seriously ill or has been diagnosed with a medical condition which requires the continuation of service to treat the medical condition; and

(2) signed by a licensed physician, nurse practitioner or physician’s assistant.

66 Pa.C.S. §§ 1401-1418

Pa Code 52 §§ 56.111 – 56.118

Medical Certificates

Medical certificates will contain the following information:

1. All certifications must be written.
 - ✓ PWSA has the option to verify the authenticity of the certification with the physician, nurse practitioner or physician's assistant.
2. The name and address of the customer or applicant in whose name the account is registered.
3. The name and address of the afflicted person and relationship to the customer or applicant.

Medical Certificates (continued)

Medical certificates will contain the following information:

4. The anticipated length of the affliction.
 - ✓ PWSA may not question the medical determination of the physician, nurse practitioner or physician's assistant.
5. The name, office address and telephone number of the certifying physician, nurse practitioner or physician's assistant.
6. The signature of the certifying physician, nurse practitioner or physician's assistant.
 - ✓ Electronic signatures and medical certificates that are electronically transmitted (faxed, emailed, etc.) are valid.



Medical Certificates (continued)

If any of the aforementioned, required information is missing, PWSA may deny the medical certificate and request that an additional medical certificate be issued with the required information. If a medical is denied for insufficient information, Collections personnel will contact the customer via telephone to explain to them at length the information that needs to be provided to PWSA so that their medical can be approved.

Termination Notices

All PWSA termination of service notices contain a Medical Emergency Notice which states:

MEDICAL EMERGENCY NOTICE:

Let us know if someone living in your home is seriously ill or has a medical condition that will be aggravated by the shut-off of service. We will not shut off your service during such illness provided you:

- (a) Have a licensed physician, nurse practitioner or physician's assistant certify in writing that such illness exists and that it may be aggravated if your service is stopped; and
- (b) Make some equitable arrangements to pay your bill.
- (c) Contact us by calling 412-255-2423.
- (d) Have your licensed physician send a letter to PWSA within 3 days verifying the medical condition.

Termination Notices and Medicals

If, prior to termination, a customer reports that a member of the household is seriously ill or requires service to treat a medical condition, place a Medical Hold lock on the account for three days. The medical professional will then have three days to submit a medical certificate. If a medical certificate is not received after three days, the Collections process will resume.

If the water service is active and a medical certificate is received, the pending termination is canceled.

Duty of Customers and PWSA



Once a medical certificate is accepted, PWSA notifies customers that they are required to pay all current, undisputed bills while the medical certificate is active.



Customers are not required to pay any outstanding balances while the medical is active.



PWSA works with customer to establish an equitable payment arrangement to address any outstanding balances and the grounds for termination.



PWSA informs customers of their payment obligations for medical certificate renewals at the time that the medical is submitted.

Duty of Customers and PWSA (continued)

If a customer continues to pay their ongoing, monthly charges while their medical certificates are in effect, they are entitled to submit a third renewal and subsequent medical certificate renewals for as long as they continue to pay the ongoing, monthly charges. If a customer fails to pay the ongoing, monthly charges, they are limited to one medical certificate and two renewals.

If an unlisted tenant submits a medical certificate, PWSA will explain the application for service and/or the tenant's rights under the Discontinuance of Service to Leased Premises Act.

Medical Certificate Renewals

Service may not be terminated for the time period specified in a medical certification. The maximum time period is 30 days.

If the customer pays their current, monthly bills while the medical is active, there is no limitation on the number of times a customer can renew a medical certificate.

If PWSA denies a medical certificate renewal due to the customer failing to pay their current, monthly bills, the customer may initiate a Dispute and the PUC Compliance team process would commence.

Medical Certificate Expiration

When a medical certificate expires and it is within 60 days of the delivery of the termination of service notice, PWSA may resume the termination process from the point it was suspended. No additional written notice is required prior to termination.

If a medical certificate expires after the 60-day period, the termination process must restart from the beginning.

Restoration of Service



If the water service is off and the customer submits a medical certificate, the water service must be restored within 24 hours.



PWSA makes a diligent effort to have service restored on the day that the medical certificate is received.

PWSA's Rights Pertaining to Medical Certificates

At any time, PWSA may petition the Commission for waiver from the medical certification procedures for the following reasons:

1. To contest the validity of a medical certificate;
2. To terminate service prior to the expiration of a medical certificate; or
3. To Contest the renewal of a medical certificate.

Questions



Thank you

Questions or comments about this training? Please contact the Customer Service Training Coordinator.



**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 4
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-4-7 What is Pittsburgh Water’s policy of negotiating a payment arrangement for a household who obtains a medical certificate?

Response:

Pittsburgh Water negotiates payment arrangements for customers with approved medical certificates that apply the Commission’s regulations and income calculator.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 31, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 4
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-4-12 Please describe Pittsburgh Water’s process for establishing payment arrangements for residential customers. Please also specifically describe what factors Pittsburgh Water utilizes to determine the length and terms and conditions of payment arrangements provided to residential customers, including how and to what extent confirmed low income status and payment troubled status are considered in this assessment.

Response:

Pittsburgh Water utilizes an income-based payment plan calculator that is built into the Customer Information System and is updated annually based on Federal Poverty Level guidelines. Customer Service Representatives input the customer’s monthly income and number of people in the household, and the plan term is automatically calculated.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 31, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 4
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-4-31 Has Pittsburgh Water developed any metrics and/or enrollments goals which since 2022 related to:

- A. Enrollment in its BDP;
- B. To gauge the success of outreach and education events related to its low income assistance programs;
- C. Unsolicited communications and/or contacts with customers related to its low income customer assistance programs.
- D. Please list what those metrics and goals are for each subpart A.-C., above.
- E. If any written materials exist establishing the goals or metrics for each subpart A.-C., above, please provide those materials, including any data collected about performance in meeting the goals or metrics and any assessment of performance.

Response:

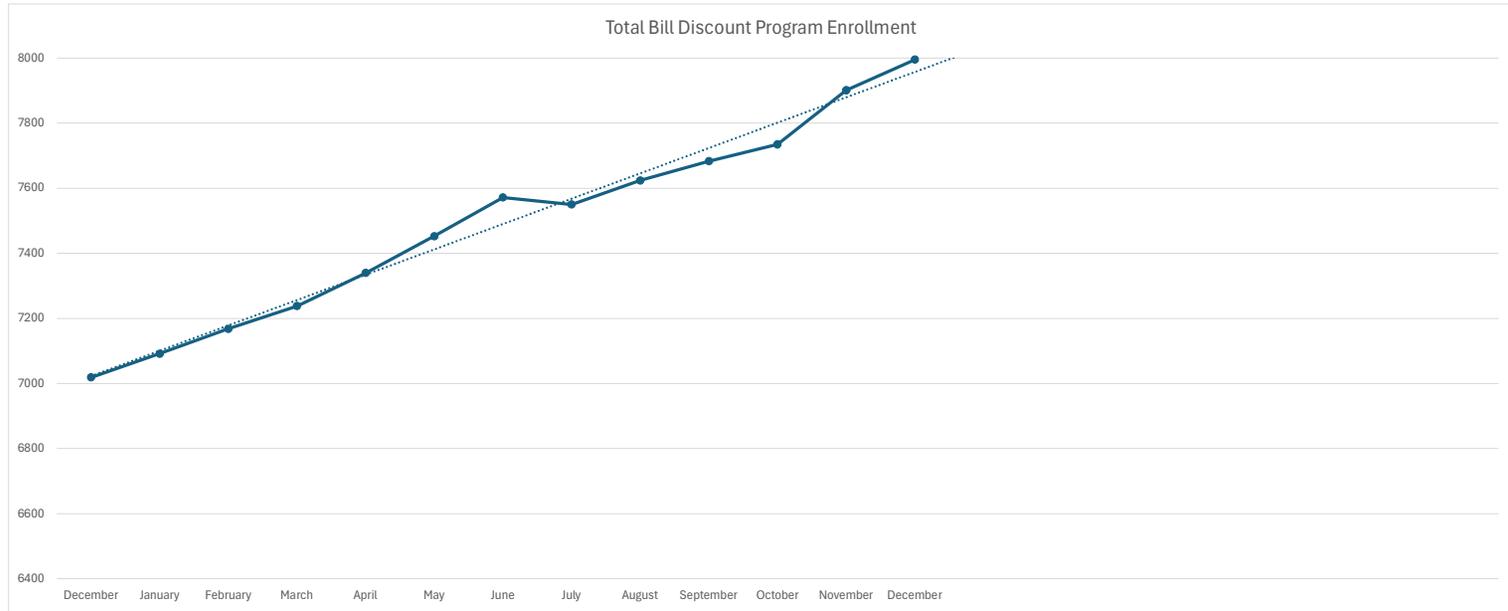
- A. The Cares team set a total Bill Discount Program enrollment goal of 8,000 by year-end 2024 and currently has a goal of 9,000 enrollments by the end of 2025.
- B. During the intake process, the Cares team asks how the customer heard about Pittsburgh Water’s customer assistance programs. The online application includes a drop-down menu for this question, and the menu includes “Pittsburgh Water Event” as a response.
- C. The Cares team tracks the source of all applications, including those that result from outbound cold calling.
- D. See OWT-4-31.A.-C.
- E. Please see the MS Excel spreadsheets titled, “OWT-4-31.A BDP Enrollments 2024-2025” and “OWT-4-31.B.-C”.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 31, 2025

Month Enrollments (1st week of the month)

December	7019
January	7092
February	7168
March	7238
April	7340
May	7453
June	7572
July	7550
August	7624
September	7683
October	7735
November	7901
December	7995



**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 5
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-5-3 For each of the six priorities set forth in Pittsburgh Water’s stormwater strategic plan at p. 11 (https://www.pgh2o.com/sites/default/files/2024-02/PWSA_SWSP_2023.12.22_Digital%20Viewing_Pages_Optimized.pdf) (hereinafter, stormwater strategic plan), please describe in detail all steps that Pittsburgh Water has taken to date to implement each of these priority areas since the strategic plan was launched through the date of the response to this interrogatory.

Response:

In response to questions about the level of implementation of various recommendations in the Stormwater Strategic Plan it should be noted that the plan is aspirational and was intended to set a road map that gives Pittsburgh Water a clear path to effective stormwater management for now and future generations. The Stormwater Strategic Plan provides guidance but is not binding on Pittsburgh Water, and anticipates future in-depth stormwater planning that will provide a more detailed stormwater management approach within Pittsburgh. (See Stormwater Strategic Plan at page 5.)

- A. **Develop a communications framework** – The detail of this framework was presented in Appendix A of the Plan. During implementation, Pittsburgh Water invited various “Stormwater Partners” to help with the planning approach for stakeholder communications. These partners included – Clean Water Action, Grounded Strategies, Pittsburgh United, Mon Water Project, Negley Run Watershed Taskforce, Pittsburgh Parks Conservancy, Watersheds of South Pittsburgh, Upstream Pittsburgh and various City Departments. The next step in this approach is to use it for the Wet Weather Planning Program as it advances.
- B. **Institute a Joint Task Force** – This Taskforce has been instituted with City Departments of Planning, Public Works and Mobility. As the work progresses, other agencies will be added as needed.
- C. **Analyze Priority Areas** – The two areas (Negley Run and Sawmill Run) have been used to help Pittsburgh Water rank projects during capital improvement program planning process. These areas have been used as tiebreakers for project prioritization.
- D. **Define Initial Investment Strategies** – Pittsburgh Water continues its efforts to identify funding opportunities.
- E. **Establish Guiding Principles for Level of Service & Flooding** – The Plan established guiding principles for use in establishing a level of service for the Pittsburgh Water system. The first step is understanding the current level of service that exists across the system and especially around “critical areas” – defined as areas that have experienced overland flooding or potentially basement backups. The Wet Weather Program Team is currently performing these analyses. Work is progressing on this front.

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 5
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

- F. **Leverage Stormwater Fee Impact** – Efforts to leverage stormwater fee impacts will be initiated in the future when the revenues from the fee fully cover existing stormwater revenue requirements.

Response provided by: Kate Mechler, Director of Engineering & Construction, Wastewater, Stormwater, and Green Infrastructure Programs

Date Response provided: August 18, 2025

Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 5 Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater) R-2025-3055012 (Storm Water)

Request: OWT-5-6 Reference pp. 26-27 of Pittsburgh Water’s stormwater strategic plan:

- A. Please specifically describe how Pittsburgh Water has concentrated investments in the priority sheds set forth on p. 26 of its stormwater strategic plan;
- B. Please indicate the number of projects completed by Pittsburgh Water in each of the priority sheds set forth on p. 26 of its stormwater strategic plan, and the date of completion of each project;
- C. Please indicate the percentage of projects completed by Pittsburgh Water in each of the priority sheds set forth on p. 26 of its stormwater strategic plan, as part of the total stormwater projects completed by Pittsburgh Water across its service territory;
- D. Please indicate the dollars spent in stormwater projected by Pittsburgh Water in each of the priority sheds set forth on p. 26 of its stormwater strategic plan;
- E. Please indicate the percent of dollars spent in stormwater projects by Pittsburgh Water in each of the priority sheds set forth on p. 26 of its stormwater strategic plan as part of the total amount spent stormwater projects by Pittsburgh Water across its service territory.

Response:

- A. Pittsburgh Water has used the priority sheds identified in the Stormwater Strategic Plan as a key factor in ranking potential projects during the Capital Improvement Planning process. Projects located in higher priority sheds are given a higher weight, ensuring that funding and resources are directed towards areas with the most significant needs or impacts.
- B. To date Pittsburgh Water has completed construction on 26 stormwater projects, 4 projects are in the construction phase, and 9 projects are in the design phase. The table below includes Project Name, Date of Completion, and Watershed based on the Stormwater Strategic Plan.

ID	Phase	Project Name	Year Completed	Watershed
1	Completed	Aspinwall Water Treatment Plant Rain Garden		
2	Completed	River Avenue Rain Garden	2015	Lower Allegheny North
3	Completed	Rosedale Runoff Reduction	2016	Negley Run
4	Completed	Red Oak and Hayson	2017	Upper Saw Mill Run
5	Completed	Melwood and Finland	2018	Two Mile Run
6	Completed	Hillcrest	2018	Two Mile Run
7	Completed	Centre and Herron	2018	Lower Monongahela

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 5
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

ID	Phase	Project Name	Year Completed	Watershed
8	Completed	McKinley Park	2020	Lower Saw Mill Run
9	Completed	Wightman Park Phase 1	2020	Four Mile Run
10	Completed	Saw Mill Run Stream Restoration Project	2020	Lower Saw Mill Run
11	Completed	Four Mile Run Early Action	2020	Four Mile Run
12	Completed	Volunteers Field Rain Garden	2020	Lower Saw Mill Run
13	Completed	Woods Run Phase 1	2021	Woods Run
14	Completed	Winchester Drive	2021	Upper Saw Mill Run
15	Completed	Volunteers Field Ballfield Regrading	2022	Lower Saw Mill Run
16	Completed	Liberty Green Park	2022	Negley Run
17	Completed	Maryland Avenue	2022	Two Mile Run
18	Completed	Woodland Road	2022	Two Mile Run
19	Completed	Lawn and Ophelia	2022	Lower Monongahela
20	Completed	Thomas and McPherson	2022	Negley Run
21	Completed	Wightman Park Phase 2	2022	Four Mile Run
22	Completed	Fleury Way	2022	Negley Run
23	Completed	Nobles Lane	2022	Lower Saw Mill Run
24	Completed	Phillips Park	2023	Lower Saw Mill Run
25	Completed	Dragoon Way	2024	Allegheny South / Heths Run
26	Completed	Braywood Way	2025	Upper Monongahela
27	Construction	Southside Flats Sewer Separation	TBD	South Side Slopes
28	Construction	Bus Rapid Transit (BRT)	TBD	Lower Monongahela
29	Construction	SMR Stream Restoration Moore Park and Crane Avenue	TBD	Lower Saw Mill Run
30	Construction	Glass Run and Chartiers Creek Stream Stabilization	TBD	Lower Chartiers Creek/ Becks Run
31	Design	Southside Park	TBD	South side slopes
32	Design	Woods Run Phase 2	TBD	Woods Run
33	Design	Four Mile Run	TBD	Four Mile Run
34	Design	Haverhill Street	TBD	Negley Run
35	Design	Stewart Avenue	TBD	Lower Saw Mill Run
36	Design	Maytide	TBD	Lower SMR
37	Design	Oakridge	TBD	Lower Saw Mill Run
38	Design	Fowler Park	TBD	Woods Run
39	Design	MLK	TBD	Lower Monongahela

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 5
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

C.

Watershed	Percentage of projects completed
Allegheny South / Heths Run	3%
Completed	3%
Four Mile Run	9%
Completed	5%
In-Design	4%
Lower Allegheny North	0%
Completed	0%
Lower Chartiers Creek/ Becks Run	4%
In-Construction	4%
Lower Monongahela	12%
Completed	3%
In-Construction	3%
In-Design	5%
Lower Saw Mill Run	29%
Completed	12%
In-Construction	4%
In-Design	14%
Negley Run	12%
Completed	8%
In-Design	4%
South Side Slopes	7%
In-Construction	3%
In-Design	4%
Two Mile Run	6%
Completed	6%
Upper Monongahela	4%
Completed	4%
Upper Saw Mill Run	2%
Completed	2%
Woods Run	11%
Completed	2%
In-Design	9%

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 5
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

D.

Watershed	Pittsburgh Water Dollars Spent to Date
Allegheny South / Heths Run	\$1,666,870.65
Four Mile Run	\$13,255,796.68
Lower Allegheny North	\$933,260.56
Lower Chartiers Creek/ Becks Run	\$1,447,651.90
Lower Monongahela	\$4,036,040.11
Lower Saw Mill Run	\$10,637,923.63
Negley Run	\$10,411,588.81
South Side Slopes	\$12,918,696.41
Two Mile Run	\$9,020,987.53
Upper Monongahela	\$1,562,248.27
Upper Saw Mill Run	\$1,617,095.70
Woods Run	\$2,685,321.21
Grand Total	\$70,193,481.46

E.

Watershed	Pittsburgh Water Percentage of Dollars Spent to Date
Allegheny South / Heths Run	2%
Four Mile Run	18%
Lower Allegheny North	1%
Lower Chartiers Creek/ Becks Run	2%
Lower Monongahela	5%
Lower Saw Mill Run	21%
Negley Run	14%
South Side Slopes	17%
Two Mile Run	12%
Upper Monongahela	2%
Upper Saw Mill Run	2%
Woods Run	4%

Response provided by: Kate Mechler, Director of Engineering & Construction, Wastewater, Stormwater, and Green Infrastructure Programs

Date Response provided: August 18, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 6
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-6-1 In response to OWT to PWSA 1-8, Attachment D. PWSA reports the pilot Line Repair and Conservation Pilot Program (LRC) total budget was \$384,084 and that the program would run until that amount was exhausted. In response to OWT to PWSA 3-4 A. and B., Pittsburgh Water indicated that the budget for 2023 was \$396,500. Please explain this discrepancy in numbers.

Response:

Per the Commission approved settlement, the total budget for the Line Repair and Conservation Pilot Program would not exceed \$400,000. Pittsburgh Water estimated at that time that they would be able to complete the Pilot with a total budget of \$396,500, which was budgeted in FY 2023 and provided in the OWT-3-4 A. and B “Line Repair Pilot Budgeted and Spent Amounts” attachment.

The budget of \$384,084 that was stated in OWT-I-8 Attach D “Line Repair and Water Conservation Pilot Program PGH2O Cares Training” was a typo in the presentation and should have been **\$324,084**. The lower budget of \$324,084 reflected the updated budget after the contractor pricing was received for the project – meaning that Pittsburgh Water received better than expected pricing. On March 24, 2023, Pittsburgh Water filed a revised Line Repair and Water Conservation Pilot Program budget under P-2022-3030253, allocating a total of \$324,084 to approved leak repairs. Please see the MS Excel spreadsheet titled, “OWT-6-1.” for the spend on these repairs in each year of the Pilot.

Pittsburgh Water also realized during FY 2023 that it would take multiple years to spend the entire \$324,084 budget. As a result, the annual amount budgeted after FY 2023 reflected the estimated annual amount that would be spent rather than the total remaining budget for the Pilot.

Response provided by: Edward Barca, Director of Finance for Pittsburgh Water

Date Response provided: August 22, 2025

OWT-6-1

Short Text	Supplier Name	Order Quantity	Spend	Year	Remain	Notes
Line Repair and Conservation Program	MITCHELL PLUMBING & HEATING, INC.	324,084.00	43,099.00	2023	280,985.00	
Line Repair and Conservation Program	MITCHELL PLUMBING & HEATING, INC.	324,084.00	108,123.51	2024	172,861.49	
Line Repair and Conservation Program	MITCHELL PLUMBING & HEATING, INC.	324,084.00	45,459.30	2025	127,402.19	to 08/20/2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 6
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-6-3 Reference Pittsburgh Water response to OWT to PWSA 3-33. Please provide a copy of a “Failed Sewer Lateral” letter and describe what happens to the customer account if the sewer lateral is not repaired.

Response:

See OWT-6-3 Attach A and Attach B for (word) copies of the Failed Sewer Lateral letter and Failed Common Sewer Lateral and Notice letter, respectively.

If the lateral is not repaired, the City of Pittsburgh (City) will start issuing fines to the property owner. If the repairs are still not made, the City will pursue action at the local magistrate’s office.

Response provided by: William McFaddin, Director of Operations

Date Response provided: August 22, 2025



[Month] ____, 202__

[Customer First/Last Name]
 [Address]
 Pittsburgh, PA ____

Customer Account No.:

Re: [Property/Address]

FAILURE NOTICE, SEWER LATERAL

Dear Customer:

This letter is to notify you that Pittsburgh Water investigated a hazardous condition at the above-referenced address and determined the sewer lateral serving this property is damaged and is a risk to public health and safety, and/or creates a risk to public property.

Although sewer main lines are public property, sewer lateral lines are owned and maintained by the owner of the property being served. As the owner of record, you will need to verify the condition of the sewer lateral and make all necessary repairs.

Due to the urgency of this matter, please submit a plan of action for repair work to the City of Pittsburgh Department of Mobility and Infrastructure (DOMI) and to Pittsburgh Water Operations, attention William McFaddin, within ten (10) calendar days of the date of this letter. Before starting repairs, you or your contractor must obtain a plumbing permit from the Allegheny County Health Department (ACHD). If work is being performed in the street, a street opening permit will also be required from DOMI. Repairs should be completed within thirty (30) calendar days of receipt of the above-referenced permits.

If you fail to take prompt action to remedy the problem, Pittsburgh Water has the right, but not the duty, to make the necessary repairs and to charge you for the reasonable cost of those repairs. Should you fail to reimburse Pittsburgh Water for costs incurred in repairing your sewer lateral, action taken may include a lien on the property, legal action to recover the costs incurred in making the repairs, or termination of water service.

For your reference, attached is Part III, Section B.7 of the Wastewater Tariff approved by the Pennsylvania Public Utility Commission. A complete version of the Pittsburgh Water's Tariffs may be found at <http://www.pgh2o.com/about-us/rules-regulations>.



If you have any questions about this matter, please contact Pittsburgh Water Dispatch at 412-255-2429 or via email at info@pgh2o.com. Office hours are Monday through Friday 8:00 a.m. to 6:00 p.m. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "BJ McFaddin".

BJ McFaddin
Director of Operations

WM/

Enclosure

CERTIFIED MAIL #:

CC: Don Bottles, Jeff Czochara, Jeff Akalican, Acting Plumbing Program Manager, Allegheny County Health Department, City of Pittsburgh Department of Mobility and Infrastructure

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Pittsburgh United Our Water Table (“OWT”), Set 6
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: OWT-6-4 Reference Pittsburgh Water response to OWT to PWSA 4-12. Do the payment arrangement lengths that Pittsburgh Water’s “payment plan calculator” differ from those used by the Public Utility Commission as reflected in former Chapter 14, Section 1405 (66 Pa. C.S. § 1405 (expired))? If so, please provide the payment plan lengths used by Pittsburgh Water’s payment plan calculator.

Response: No.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: August 22, 2025

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Interrogatories of the Office of Consumer Advocate (“OCA”), Set IV
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

- Request: OCA-IV-3** Where applicable, in Excel format, by month for the most recent 24 months available, please provide, disaggregated by Bill Discount Program (BDP) tier, the number of actual participants in (or recipients of):
- a. Pittsburgh Water’s Bill Discount Program;
 - b. Pittsburgh Water’s Arrearage Forgiveness Program;
 - c. Pittsburgh Water’s hardship grant program.

Response: Please see the MS Excel document titled, “OCA-4-3 Bill Discount, Arrearage Forgiveness, Hardship Grant Participants July 2023-July 2025”.

Response provided by: Julie A. Mechling, Director of Customer Service

Date Response provided: July 23, 2025

Bill Discount, Arrearage Forgiveness, Hardship Grant Participants July 2023-2025

2023	Participants
July	6654
August	6709
September	6746
October	6832
November	6832
December	6961

2024	Participants
January	7092
February	7168
March	7238
April	7340
May	7453
June	7572
July	7550
August	7624
September	7683
October	7735
November	7901
December	7995

2025	Participants
January	8079
February	8221
March	8326
April	8397
May	8397
June	8411
July	8538

Bill Discount, Arrearage Forgiveness, Hardship Grant Participants July 2023-2025

2023	Recipients
July	1029
August	820
September	835
October	781
November	831
December	1003

2024	Recipients
January	684
February	726
March	708
April	540
May	621
June	755
July	689
August	807
September	813
October	783
November	749
December	735

2025	Recipients
January	644
February	658
March	735
April	745
May	778
June	869
July	844

Bill Discount, Arrearage Forgiveness, Hardship Grant Participants July 2023-2025

2023	Recipients
July	45
August	46
September	34
October	41
November	40
December	39

2024	Recipients
January	45
February	62
March	85
April	139
May	99
June	86
July	102
August	134
September	89
October	111
November	85
December	63

2025	Recipients
January	69
February	83
March	138
April	175
May	130
June	102

**Response of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water
to the Data Requests of the
Bureau of Investigation and Enforcement (I&E”), Set RE 20 - 32
Docket Nos. R-2025-3055010 (Water), R-2025-3055011 (Wastewater)
R-2025-3055012 (Storm Water)**

Request: I&E-RE-29 Reference Pittsburgh Water Statement No. 2, pp. 67-68 and Pittsburgh Water Statement No. 6, pp. 35-38 regarding enhancements to the Arrearage Forgiveness Program. Provide the following:

- A. Detailed basis and calculation for the \$280,094 projected in the FPFTY and \$291,828 projected in fiscal year (FY) 2027.
- B. Lost revenues incurred in relation to this program in FY 2022, FY 2023, and FY 2024.

Response:

- A. See I&E-RE-29 (excel).
- B. Pittsburgh Water does not have this information.

Response provided by: Edward Barca, Director of Finance for Pittsburgh Water

Date response provided: August 12, 2025

	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Total	
Current AFP	269,178.04	269,178.04	-	-	-	-	-	-	-	-	-	-	-	-	538,356.08	
New AFP Participants	10,915.79	22,650.25	24,349.02	26,175.20	28,138.34	30,248.72	32,517.37	34,956.17	37,577.88	40,396.23	43,425.94	46,682.89	31,975.72	7,790.61	417,800.13	
	280,093.83	291,828.29	24,349.02	26,175.20	28,138.34	30,248.72	32,517.37	34,956.17	37,577.88	40,396.23	43,425.94	46,682.89	31,975.72	7,790.61	956,156.21	
New AFP Participants	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	Year 12	Year 13	Year 14	Total	
Year 1	51	10,915.79	10,915.79												21,831.57	
Year 2	55		11,734.47	11,734.47											23,468.94	
Year 3	59			12,614.55	12,614.55										25,229.11	
Year 4	63				13,560.65	13,560.65									27,121.29	
Year 5	68					14,577.69	14,577.69								29,155.39	
Year 6	73						15,671.02	15,671.02							31,342.04	
Year 7	79							16,846.35	16,846.35						33,692.70	
Year 8	85								18,109.82	18,109.82					36,219.65	
Year 9	91									19,468.06	19,468.06				38,936.12	
Year 10	98										20,928.17	20,928.17			41,856.33	
Year 11	105											22,497.78	22,497.78		44,995.55	
Year 12	113												24,185.11	24,185.11	48,370.22	
Year 13	36													7,790.61	15,581.22	
	976	10,915.79	22,650.25	24,349.02	26,175.20	28,138.34	30,248.72	32,517.37	34,956.17	37,577.88	40,396.23	43,425.94	46,682.89	31,975.72	7,790.61	417,800.13

Current AFP	
Number of Accounts	642
Total Balance	538,356.08
Average Balance	838.56
Average Acct. Increa. Per Month	4.00
Average Balance Increase Per Month	428.07

BDP but not in AFP	
Number of Accounts	976
Total Balance	417,800.13
Average Balance	428.07

In the next base rate case filed by PWSA, it shall propose to implement a change to its AFP that would allow then existing and all future participants to receive arrearage forgiveness over no longer than a 36 month period and will not require AFP participants to make a co-payment towards the pre-program frozen arrears. All parties reserve their rights regarding any cost recovery proposal proposed regarding the AFP.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**REBUTTAL TESTIMONY OF PATRICK M. CICERO
ON BEHALF OF
PITTSBURGH UNITED OUR WATER TABLE**

September 30, 2025

PREPARED REBUTTAL TESTIMONY OF PATRICK M. CICERO

Q: Please state your name, occupation, and business address.

A: My name is Patrick M. Cicero. I am employed as Of Counsel by the Pennsylvania Utility Law Project (PULP), a specialized component of Regional Housing Legal Services. My business address is 118 Locust Street, Harrisburg, PA 17101.

Q: Did you previously submit testimony in this proceeding?

A: Yes. On September 5, 2025, I submitted direct testimony on behalf of Pittsburgh United Our Water Table that is pre-marked as Our Water Table (OWT) Statement 1.

Q: What is the purpose of your rebuttal testimony?

A: My rebuttal testimony responds to the direct testimony of Office of Small Business Advocate (OSBA) witness, Joseph Kubas. As discussed in detail below, I disagree with Mr. Kubas’s arguments and recommendations that costs associated with Pittsburgh Water’s low income assistance programs should be recovered solely from the residential customer class. I support Pittsburgh Water’s current allocation of costs as the provision of assistance to Pittsburgh Water’s low income customers provide tangible benefits to all customer classes.

This rebuttal testimony does address every issue raised or otherwise discussed by other parties’ witnesses in direct testimony. This does not mean that I agree with every other witness. Unless required for context in providing a further response to direct testimony, I will not reiterate the extensive arguments and evidence that I provided in my direct testimony. To the extent an argument raised by any party in rebuttal is already sufficiently addressed in my direct testimony, I

1 do not intend to respond, and stand on my evaluation, analysis, and recommendations in my direct
2 testimony.

3 **Q: Please summarize Mr. Kubas’s direct testimony to which you wish to respond.**

4 A: Mr. Kubas explains that Pittsburgh Water’s class cost of service study (CCOS) sets forth
5 certain forgone revenue in 2026 and 2027 related to Pittsburgh Water’s Bill Discount Program
6 (BDP), Hardship Fund; Leak Credit expenses; Arrearage Forgiveness Program (AFP); and service
7 line repairs.¹ Mr. Kubas argues that customer assistance program costs for 2026 and 2027 should
8 be recovered solely from residential customers (excluding stormwater customers).² Mr. Kubas
9 incorrectly argues that these programs exist solely for the benefit of residential customers, and that
10 cost allocation principles direct that residential customers should therefore bear the costs of these
11 programs.³ Mr. Kubas also argues that nonresidential customers should only be responsible for
12 paying bills based on their own consumption – again, with the exception of stormwater costs.⁴

13 Based on Mr. Kubas’s calculations, if his recommendations related to allocation of
14 customer assistance program costs were accepted, the water system revenue requirement for
15 residential customers would increase by approximately \$2.8 million in the FPFTY, and by \$2.9
16 million in the FY 2027.⁵ Mr. Kubas estimates that his recommendations would increase the
17 wastewater system revenue requirement for the residential class by approximately \$797,000 in the
18 FPFTY, and by approximately \$889,000 in the FY 2027.⁶

¹ OSBA St. 1 at 17-18.

² Id. at 19: 1-6.

³ Id. at 19: 1-14.

⁴ Id.

⁵ OSBA St. 1 at 20.

⁶ Id.

1 Mr. Kubas also argues that revenue shortfalls associated with Pittsburgh Water providing
2 PENNVEST surcharge discounts to customers enrolled in the BDP should be recovered solely
3 from residential customers.⁷ Mr. Kubas notes that, based on the Company’s original filing, the
4 revenue shortfall from providing residential CAP customers a 50% discount on PENNVEST
5 surcharges is \$206,626 in 2026 and \$299,072 in FY 2027.⁸ Mr. Kubas again incorrectly argues that
6 cost allocation principles prescribe that each customer class bear the costs of service which directly
7 benefit them,⁹ and that non-residential customers should not have to share in these costs because
8 they are not eligible for this discount.¹⁰ Mr. Kubas acknowledges that recovering the PENNVEST
9 CAP discount solely from residential customers will increase residential PENNVEST rates.¹¹

10 **Q: What is your response to Mr. Kubas’s testimony that the costs associated with**
11 **Pittsburgh Water’s low income assistance programs should be recovered solely from**
12 **residential customers?**

13 A: I disagree with Mr. Kubas’s assessment that Pittsburgh Water should recover costs
14 associated with Pittsburgh Water’s low income assistance programs solely from residential
15 customers. It is unreasonable for residential customers to solely bear the burden of these costs.
16 These programs are meant to remediate the impacts of poverty and utility insecurity which impact
17 all customer classes. Poverty is a societal problem, affecting all customers. It requires holistic
18 solutions. Similarly, utility insecurity is a broad societal problem with long-term and far-ranging
19 impacts for low income households, as well as the surrounding communities in which they live

⁷ Id. at 13: 13-21.

⁸ Id. at 13: 1-6.

⁹ Id. at 13: 13-21.

¹⁰ Id. at 13: 13-21.

¹¹ Id. at 23: 14-21.

1 and work.¹² Households who cannot afford utility services are more prone to a host of adverse
2 consequences, including increased rates of health complications and hospitalization, eviction, and
3 food insecurity.¹³ For children in low income households, utility insecurity has been linked to
4 adverse impacts on long-term health and developmental delays.¹⁴ Communities of color also
5 continue to experience utility insecurity at disproportionate and high levels.¹⁵

6 While low income residential customers who participate in assistance programs may
7 realize the most direct and easily quantifiable benefits as a result of these programs, the programs
8 and discounts provided by Pittsburgh Water for eligible low income customers provide important

¹² NRDC, NCLC, Water Affordability Advocacy Toolkit, at pp. 11-12, 22-23, available at <https://www.nrdc.org/sites/default/files/water-affordability-toolkit-full-report.pdf> (last visited Sept. 22, 2025) (hereafter, Water Affordability and Advocacy Toolkit) (discussing how water affordability issues impact consumers on the individual, community, regional, and state levels); Nina Lakhani, Revealed: millions of Americans can't afford water as bills rise 80% in a decade (June 23, 2020), available at <https://www.theguardian.com/us-news/2020/jun/23/millions-of-americans-cant-afford-water-bills-rise>, (last visited Sept. 22, 2025) (discussing the impacts of water unaffordability on low income households and their communities); See Diana Hernández, Energy Insecurity And Health: America's Hidden Hardship, Health Affairs, available at: <https://www.healthaffairs.org/doi/10.1377/hpb20230518.472953/> (last visited Sept. 22, 2025) (as a parallel to energy affordability, discussing the links between energy insecurity and adverse outcomes in health, food insecurity, and access to stable and affordable housing).

¹³ See Final Report, Recommendations for Implementation of a Statewide Low-Income Water Rate Assistance Program (Feb. 2020) at pp 15-17 (when water is unaffordable, families consume less than is healthy or sacrifice other necessities), available at https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/assistance/docs/ab401_report.pdf (last visited Sept. 22, 2025); Water Affordability Advocacy Toolkit, at 12, 22, 26 (last visited Sept. 22, 2025) (discussing the broad impacts of water insecurity and shutoffs, including but not limited to threats to housing access and individual and community health).

¹⁴ Water Affordability Advocacy Toolkit at 23 (last visited Sept. 17, 2025) (discussing the impacts on children and family unity as a result of loss of water services); Thurgood Marshall Institute at the NAACP Legal Defense and Education Fund, Water/ Color: A Study of Race & the Water Affordability Crisis in America's Cities (hereafter Water/ Color Report), at pp. 57-58, available at: http://www.naacpldf.org/wp-content/uploads/Water_Report_FULL_5_31_19_FINAL_OPT.pdf (last visited Sept. 22, 2025) (discussing impacts on children from lack of access to water and sanitation infrastructure). See also Diana Hernández, Yumiko Aratani, and Yang Jiang, Energy Insecurity Among Families with Children (January 2014), available at http://www.nccp.org/publications/pdf/text_1086.pdf (last visited Sept. 22, 2025) (while the author discusses energy insecurity, parallels exist related to utility insecurity as a whole).

¹⁵ Water/ Color Report at 4, 26, 31 (last visited Sept. 22, 2025) (discussing how rising water rates and water insecurity is more likely to impact communities of color); Water Affordability and Advocacy Toolkit at 4, 10 (last visited Sept. 22, 2025) (discussing how the negative impacts of water insecurity and shutoffs disproportionately impact communities of color); Environmental and Climate Justice Program, NAACP, Lights Out In The Cold: Reforming Utility Shut-Off Policies as If Human Rights Matter at ix (March 2017), available at <https://naacp.org/resources/lights-out-cold> (last visited Sept. 22, 2025) (while the author primarily discusses energy insecurity, parallels exist to utility insecurity as a whole, and its disproportionate impact on communities of color).

1 societal benefits which are shared by non-residential ratepayers, and cannot be ignored. Similarly,
2 since low income customers who do not participate in these programs often have arrearages that
3 are higher than customers who do participate,¹⁶ these costs cannot be avoided in rates. They will
4 either be paid as a part of foregone revenue upfront through assistance programs or collected
5 through uncollectible expenses. Furthermore, to the point that all customers benefit when low
6 income customers can maintain service, it is important to note that residential customers do not
7 cause poverty or the hardship that requires assistance in the first place. Many low income
8 assistance program participants are employed, but do not receive a wage that is adequate to afford
9 basic household needs.¹⁷ Other low income assistance program participants are retired seniors or
10 individuals on disability who do not receive sufficient social security, disability, or retirement
11 benefits to afford basic life necessities, including water and wastewater services.

12 In addition to the adverse physical health impacts which result from lack of utility services,
13 low income customers who face utility insecurity often struggle with heightened levels of stress,
14 anxiety and depression – and must take time away from work to arrange payments, locate or apply
15 for assistance programs, and arrange for reconnections.¹⁸ These consequences of utility insecurity

¹⁶ OWT St. 1 at 26, Table 6 (illustrating the higher average arrearage levels of confirmed low income non-BDP customers, compared to the average arrears of BDP customers and residential customers).

¹⁷ See, e.g., OWT St. 1 at 15-16, citing to PathWays PA, 2024 Self Sufficiency Standard Table, by County, available at:

<http://www.selfsufficiencystandard.org/pennsylvania> (For reference, the *average* Self Sufficiency Standard in Allegheny County for a family of four with two adults and two school aged children is approximately \$81,594 a year.) (last visited Sept. 24, 2025).

¹⁸ Water Affordability Advocacy Toolkit at 10 (last visited Sept. 22, 2025) (discussing the severe impacts of rising water costs on households and communities, including economic hardship and mental stress); Dahlia Rockowitz, Chris Askew-Merwin, Malavika Sahai *et al*, Household Water Security in Metropolitan Detroit: Measuring the Affordability Gap, University of Michigan Poverty Solutions (Aug. 2018) at 4 (correlation between water insecurity, psychological distress, and impacts on work as a result of bill unaffordability), available at <https://poverty.umich.edu/research-publications/policy-briefs/household-water-security-in-metropolitan-detroit-measuring-the-affordability-gap/> (last visited Sept. 22, 2025); see also, Diana Hernadez, Understanding ‘energy insecurity’ and why it matters to health, Social Science & Medicine, Volume 167, October 2016, available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5114037/> (similar utility insecurity stress with energy) (last visited Sept. 22, 2025).

1 significantly undermine worker productivity, which – in turn – impacts businesses, nonprofits,
2 governmental entities, schools, and other non-residential customer groups. In addition, low income
3 assistance programs help utility companies to control uncollectible expenses which ultimately
4 impact all ratepayers.

5 In sum, all customer classes (including industry, business, commerce, educational
6 institutions, hospitals, local and state governments, and other residential customers) benefit from
7 the availability and existence of universal service programs and assistance. It is a sound policy
8 decision for all customers to share the costs of providing these programs to our most vulnerable
9 consumers.

10 **Q: Has the Commission addressed these issues?**

11 A: Yes. In its Final CAP Policy Statement and Order, the Commission addressed the recovery
12 of universal service program costs.¹⁹ While the Commission did not require jurisdictional utilities
13 to propose specific allocations, the Commission indicated that it is appropriate to consider recovery
14 of the costs of customer assistance programs from all ratepayer classes because “poverty, poor
15 housing stock, and other factors that contribute to households struggling to afford utility service
16 are not just ‘residential class’ problems.” The Commission explained that the provision of universal
17 services to help low income families maintain service to their homes is “a benefit to the economic
18 climate of a community.”²⁰ The Commission directed utilities and stakeholders to address CAP
19 cost recovery in utility-specific rate proceedings, indicating that “the Commission will no longer
20 routinely exempt non-residential classes from universal service obligations.”²¹

¹⁹ Final CAP Policy Statement and Order, Docket No. M-2019-3012599, at 97 (Order entered Nov. 5, 2019); see also 52 Pa. Code §§ 69.265(1), 69.266(b).

²⁰ Final CAP Policy Statement and Order at 7, 94-96, 107.

²¹ Id. at 97; see also 66 Pa. C.S. § 69.266(b).

1 **Q: Are you providing your opinion about these issues as an attorney in this proceeding?**

2 A: No. Importantly, though I am an attorney, I am not serving in that capacity in this
3 proceeding, and I am not providing a legal position related to universal service cost recovery, or
4 the legal applicability of the Commission’s Final CAP Policy Statement to the current proceeding.
5 These legal aspects will be addressed through briefing. My testimony focuses on the policy reasons
6 why cross-class recovery of low income assistance program costs is appropriate.

7 **Q: Does Pittsburgh Water’s status as a publicly-owned utility have any bearing on how**
8 **low income assistance program costs are recovered?**

9 A: Yes, Pittsburgh Water’s status as a publicly owned and operated jurisdictional utility is
10 relevant to consideration of cross-class recovery of low income assistance program costs.²²
11 Pittsburgh Water has a public Board of Directors which acts as the governing body for the
12 Authority and is responsible for “making decisions on project and program expenditures, approve
13 our annual budget, and provide direction on initiatives to improve water, sewer, and stormwater
14 services.”²³ The decision to recover low income assistance program costs from all ratepayers was
15 a policy decision of a public board. Notably, at present, the only other publicly owned utility
16 subject to PUC regulation, Philadelphia Gas Works (PGW), also recovers universal service
17 programming from all ratepayers - rather than residential ratepayers alone.²⁴

²² Pittsburgh Water’s status as a municipal utility is relevant, but not dispositive of whether cross class recovery should occur. As noted above, the public policy basis for supporting cross-class recovery of low income assistance program costs exists regardless of whether a utility is public or private.

²³ PWSA, Board & Board Meetings, available at <https://www.pgh2o.com/about-us/board-board-meetings>. (last visited Sept. 24, 2025).

²⁴ 2023 Report on Universal Service Programs & Collections Performance, at 81, available at: https://www.puc.pa.gov/media/3433/2023_universal_service_report-final_rev041525.pdf (last visited Sept. 24, 2025).

1 **Q: What is your recommendation regarding the allocation of costs associated with**
2 **Pittsburgh Water’s low income assistance programs?**

3 A: I recommend that the Commission reject Mr. Kubas’s proposal that costs associated with
4 the BDP, AFP, Hardship Fund, service line repair and leak credit offerings, and PENNVEST
5 discounts be recovered solely from the residential customer class. Instead, I support the allocation
6 of these costs as proposed by Pittsburgh Water.

7 **Q: Does this conclude your rebuttal testimony in this matter?**

8 A: Yes.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

**SURREBUTTAL TESTIMONY OF PATRICK M. CICERO
ON BEHALF OF
PITTSBURGH UNITED OUR WATER TABLE**

October 14, 2025

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PREPARED SURREBUTTAL TESTIMONY OF PATRICK M. CICERO

Q: Please state your name, occupation, and business address.

A: My name is Patrick M. Cicero. I am employed as Of Counsel by the Pennsylvania Utility Law Project (PULP), a specialized component of Regional Housing Legal Services. My business address is 118 Locust Street, Harrisburg, PA 17101.

Q: Did you previously submit testimony in this proceeding?

A: Yes. On September 5, 2025, I submitted direct testimony on behalf of Pittsburgh United Our Water Table that is pre-marked as Our Water Table (OWT) Statement 1. I also submitted rebuttal testimony on September 30, 2025, that is pre-marked as OWT Statement 1-R.

Q: What is the purpose of your surrebuttal testimony?

A: To respond to the testimony of Pittsburgh Water witnesses Harold Smith,¹ Julie Mechling,² Edward Barca,³ Kate Mechler,⁴ and Rockey Craley.⁵ I also briefly respond to Office of Small Business Advocate (OSBA) witness Joseph Kubas.⁶ I have divided my surrebuttal testimony thematically to address the substantive issues addressed by various witnesses. The fact that I do not address every issue discussed by these witnesses, other witnesses of Pittsburgh Water, or the witnesses of other parties as to their respective rebuttal testimony does not signal my agreement with their positions. Unless otherwise stated in this testimony, I fully support and stand by the positions advanced in my direct and rebuttal testimony.

¹ Pittsburgh Water St. 8R.

² Pittsburgh Water St. 6R.

³ Pittsburgh Water St. 2R.

⁴ Pittsburgh Water St. 4R.

⁵ Pittsburgh Water St. 9R.

⁶ OSBA St. 1R.

1 **I. Multi Year Rate Plan and Ratemaking**

2 **Q: What will you address in this section of your testimony?**

3 A: I address the testimony of Pittsburgh Water witnesses Harold Smith and Julie Mechling,
4 concerning my proposal that Pittsburgh Water eliminate its minimum charge at the effective date
5 of rates in this proceeding rather than in 2027 as proposed by the Authority. I will also address
6 Pittsburgh Water witness Mr. Edward Barca’s⁷ response to my recommendations and the
7 recommendations of other witnesses that the Commission reject Pittsburgh Water’s request for a
8 multi-year rate plan, as well as his response to my testimony concerning the Authority’s proposal
9 to increase the amount collected through its PENNVEST surcharge.

10 **Q: Please describe Mr. Smith’s and Ms. Mechling’s response to your proposal to**
11 **eliminate the minimum charge with the effective date of rates.**

12 A: Mr. Smith asserted that the Authority “believes that the removal should be delayed until
13 FY 2027 in order to allow for adequate time to change the billing system and notify customers.”⁸
14 He also detailed the impact of this change on customers’ bills, as either a decrease or an increase
15 in bills. Specifically, 26.6% of Bill Discount Program (BDP) customers would see a decrease in
16 their bill relative to the same bill with a minimum usage threshold, and the remaining 73.4% would
17 see an increase.⁹ Finally, because of the complexity of the changes involved, he asserts:

18 Pittsburgh Water intends to engage in public education and outreach in order to help
19 its customers understand these changes and the effects on their bills. In my
20 experience, properly implementing this type of change can take 6–12 months.
21 Attempting to accomplish all of this immediately after the Commission issues its
22 order in February 2026 for rates effective in March 2026 would create a significant
23 chance for errors and increased complaints.¹⁰

⁷ Pittsburgh Water St. 2R.

⁸ Pittsburgh Water St. 8R at 8:13-15.

⁹ *Id.* at 9, Table.

¹⁰ *Id.* at 11:11-16.

1 Ms. Mechling asserts that the goal of Pittsburgh Water delaying the implementation of this
2 change was to “smooth out some of the rate swings that would occur if a wholesale change was
3 made in 2026.”¹¹ She also contends that it would not have been reasonable for the Authority to
4 have designed this change to take effect in FY 2026 because there was too much uncertainty about
5 what the Commission would approve, whether other parties would have made different proposals,
6 or whether their approach would be revised in this case.¹²

7 **Q: What is your response to the concerns raised by these witnesses?**

8 A: I appreciate the additional information, context and clarification about the bill impacts to
9 customers that would result from making this change in FY 2026 rather than FY 2027. In my direct
10 testimony, I recognized the impact that removing the minimum charge would have on low income
11 customers, including those enrolled in BDP, which is why I recommend additional BDP changes
12 to accommodate this impact.¹³ My direct testimony was clear that my recommendation to remove
13 the minimum allowance and my recommended changes to BDP were connected and designed to
14 work together.¹⁴ Despite its commitments in the last several rate cases, the Authority continues to
15 delay implementing this change.¹⁵ I continue to be concerned about Pittsburgh Water’s trend of
16 proposing to implement this change 2 years out from the filing of a rate case because of its desire
17 to implement a multi-year rate plan. However, in light of the articulated concerns raised by Mr.
18 Smith and Ms. Mechling about needed billing system changes and needed time for consumer
19 education, I am revising my recommendation to be consistent with the other parties in this case
20 who have addressed this issue. Specifically, consistent with the recommendation of the Office of

¹¹ Pittsburgh Water St. 6R at 3:17-18.

¹² Id. at 6.

¹³ Our Water Table St. 1 at 56.

¹⁴ Id.

¹⁵ Id.

1 Consumer Advocate (OCA)¹⁶ and the Bureau of Investigation and Enforcement (I&E),¹⁷ I
2 recommend that Pittsburgh Water be required to implement its removal of the minimum charge by
3 no later than January 2027. I continue to oppose the implementation of a multi-year rate plan so
4 the implementation of this change would be to rates as established in this case.

5 While my recommended changes to the BDP structure were connected and designed to
6 work in coordination with the removal of the minimum charge, they were not contingent on
7 immediate removal of those charges and, thus, I am not modifying my recommendation about the
8 needed BDP bill structure changes. I address Pittsburgh Water’s concerns about my recommended
9 changes later in my testimony.

10 **Q: Please explain why you continue to oppose the multi-year rate plan (MYRP).**

11 A: Pittsburgh Water’s rebuttal testimony does not present a compelling case as to why it
12 requires a multiyear rate increase. Pittsburgh Water witness Barca consistently misconstrues the
13 requirements under the Public Utility Code for analyzing whether to approve a MYRP. For
14 example, he asserts that “[s]ection 1330 of the Public Utility Code *specifically directs the PUC to*
15 *approve* a variety of alternative rate mechanisms, including an MYRP.”¹⁸ This is incorrect. Counsel
16 for OWT will fully brief the requirements of Section 1330 and the approval of an alternate
17 ratemaking mechanism, but Mr. Barca is simply incorrect when he says that the Code *directs* the
18 PUC to approve alternative ratemaking. The Code permits the PUC to do so, but it does not direct
19 it to do so. Here, Pittsburgh Water has requested an alternative ratemaking mechanism but there is
20 nothing that compels the Commission to approve it.

¹⁶ OCA St. 4 at 13-14, 19-20 and OCA St. 1 at 37-40.

¹⁷ I&E St. 1 at 19-21.

¹⁸ Pittsburgh Water St. 2R at 59:3-5 (emphasis added).

1 Furthermore, Mr. Barca’s testimony presents contradictory processes that the Authority
2 envisions. In his direct testimony, Mr. Barca indicated that the Commission would have the ability
3 to comment on the proposed debt issuance, not other parties.¹⁹ In rebuttal, he expands that review
4 to “the Parties and the Commission”²⁰ This expansion does not save the proposal. As indicated in
5 my direct testimony, the mini review proceeding Pittsburgh Water anticipates and requests would
6 allow the Commission (and now the Parties) to check the Authority’s math but would not allow
7 the Parties or the Commission to contest the increase if the math is correct. This does not benefit
8 consumers or the public in any meaningful way. Customers should not have their rates increased
9 between cases without a fulsome review of whether this increase is needed given the resources
10 available at the time of the request. This is why rate cases are important as all costs and expenses
11 can be examined.

12 **Q: Mr. Barca, in addressing your direct testimony, asserts that the use of the fully**
13 **projected future test year (FPFTY) is insufficient to provide the Authority with the resources**
14 **that it needs to manage its revenue, expenses, and costs,²¹ what is your response?**

15 A: I disagree with Mr. Barca. In the absence of an approved MYRP, it is accurate that the use
16 of the FPFTY does not allow the Authority to roll into rates all of its costs for new debt in 2027,
17 on a dollar-for-dollar basis. However, I see this as a benefit to consumers – not a detriment. While
18 Pittsburgh Water wants to lock in its ability to recover its costs of debt on a dollar-for-dollar basis,
19 this is not how ratemaking works – even for a cash flow utility. By using an FPFTY, Pittsburgh
20 Water gets the benefit of setting rates as it anticipates the world to be in March 2027 at the end of
21 the FPFTY. This future projection allows it to recover anticipated expenses and capital costs well

¹⁹ Pittsburgh Water St.2 at 58.

²⁰ Pittsburgh Water St. 2R at 60:3-4.

²¹ Id. at 84.

1 into the future and provides the Authority with significant flexibility in its projections. While I
2 agree that it is not as flexible as allowing a MYRP, the balance of consumer interests with those of
3 the Authority weigh heavily against allowing an MYRP for all the reasons outlined in my direct
4 testimony²² as well as the testimony of witnesses for the OCA²³ and I&E.²⁴

5 **Q: In response to your testimony on the Authority’s proposed changes to its PENNVEST**
6 **recovery, Mr. Barca asserts that the changes it proposes will not result in a shifting of risk**
7 **from the Authority to customers, will not create a guarantee of recovery, and will not provide**
8 **increased flexibility in cash flow.²⁵ What is your response?**

9 A: I simply disagree with Mr. Barca. By removing the repayment of PENNVEST loans from
10 rates that are not fully reconcilable into a rider that is fully reconcilable, the risks shift to customers
11 because there is little to no risk to the Authority from under collection. These now become
12 passthrough charges that increase or decrease with the amount of the outstanding loans in
13 repayment and can be adjusted up and down outside of a rate case. This shifts risk to consumers
14 rather than the management of the Authority, and provides the Authority with flexibility because
15 the recovery of this debt expense is separately assessed from rates. To be clear, I am not opposing
16 the Authority’s proposal in this case. My testimony in Direct merely discusses the fact that since
17 this recovery will now be outside of a base rates, it is one more reason why an MYRP is not
18 necessary because Pittsburgh Water is already substantially insulated from risk. I stand by my
19 conclusion for all the reasons outlined here and in my Direct Testimony.

²² Our Water Table St. 1 at 34-38.

²³ OCA St. 1 at 10-27.

²⁴ I&E St. 1 at 7-12.

²⁵ Pittsburgh Water St. 2R at 88-89.

1 **II. Programs that Assist Low Income Customers**

2 A. Arrearage Forgiveness Program (AFP)

3 1. *AFP Copayment Requirements*

4 **Q: In your direct testimony, you recommend that Pittsburgh Water be required to revise**
5 **its proposed tariffs to accurately reflect that AFP participants are not required to make**
6 **copayments.²⁶ Did Pittsburgh Water clarify its position on this issue in rebuttal?**

7 A: Yes. Ms. Mechling agreed that this was the intent of the new program and that the language
8 in Pittsburgh Water’s current proposed water and wastewater tariffs should remove references to
9 payment arrangements for AFP participants.²⁷ I appreciate Pittsburgh Water’s clarification and its
10 commitment to remove references to payment arrangements in its compliance tariff.

11 **Q: Please summarize Ms. Mechling’s rebuttal testimony regarding your**
12 **recommendation that AFP participants receive forgiveness for each in-full payment?²⁸**

13 A: In my direct testimony I recommend that Pittsburgh Water eliminate its current practice of
14 removing participants from the AFP after two missed payments, and instead allow customers to
15 receive AFP forgiveness for each in-full payment made while enrolled in the Program, regardless
16 of whether these payments are made on time.²⁹ OCA witness Roger Colton similarly argues that
17 requiring on-time payments as part of the new AFP “may serve as a disincentive for customer
18 participation.”³⁰

19 Ms. Mechling disagreed. It is her position that (1) the Authority’s proposals are consistent
20 with current requirements, and changes could create additional costs; (2) it is important to
21 encourage customers structure their monthly bills to consistently pay by due dates to avoid debt

²⁶ OWT St. 1 at 61.

²⁷ Pittsburgh Water St. 6R at 18: 15-22.

²⁸ OWT St. 1 at 63–64.

²⁹ Id.

³⁰ OCA St. 6 at 61.

1 accumulation; and (3) customer payments are achievable because AFP participants are eligible for
2 BDP enrollment.³¹

3 **Q: What is your response?**

4 A: I disagree with Ms. Mechling’s arguments that strict timeliness requirements are necessary
5 to incentivize customers to pay their bills. This position fails to recognize the precarious financial
6 nature of poverty which often is accompanied by inconsistent income and unexpected bills that
7 require immediate attention. Furthermore, the AFP encourages participants to pay their monthly
8 bills by providing forgiveness for in-full payments. Restricting forgiveness where customers
9 cannot consistently make in-full payments within a narrowly prescribed timeframe fails to
10 acknowledge the economic realities faced by those experiencing poverty, and discourages in full
11 payments from BDP participants, as I have outlined further in my direct testimony.³²

12 I also disagree with Ms. Mechling’s assertion that AFP participants should be able to
13 consistently pay bills within narrowly prescribed timeframes because they have access to the
14 BDP.³³ As discussed in detail below, Pittsburgh Water continues to operate the AFP and BDP as
15 separate programs – and, thus, AFP enrollment is not a guarantee of BDP enrollment or vice versa.
16 Further, as outlined extensively in my direct testimony, Pittsburgh Water’s BDP customers may be
17 subject to unaffordable bills, both at present BDP rates and under Pittsburgh Water’s BDP
18 proposal.³⁴ Persistent unaffordability within Pittsburgh Water’s BDP is particularly acute for larger
19 families and high usage customers. Pittsburgh Water customers who cannot achieve consistently
20 affordable monthly bills, even while enrolled in the BDP, should have access to AFP forgiveness
21 if they are able to pay their bills in full – even if they cannot do so by due dates.

³¹ Pittsburgh Water St. 6R at 19-20.

³² OWT St. 1 at 63: 6-16.

³³ Pittsburgh Water St. 6R at 20.

³⁴ OWT St. 1 at 22-24, 54-56. See also OWT St. 1, Exhibit 1.

1 Finally, I understand that changing Pittsburgh Water’s current restrictions related to catch-
2 up payments may incur some additional costs. Ms. Mechling does not quantify what these costs
3 may be, nor does she take into consideration the costs that will be saved to Pittsburgh Water if
4 customers are able to achieve forgiveness through the AFP – including to the potential for reduced
5 uncollectible expenses if customers can afford and remain connected to services. I continue to
6 support my recommendation from direct testimony: All customers enrolled in AFP should remain
7 in AFP until their arrearages are fully forgiven and should receive forgiveness for each in full
8 payment regardless of whether that payment is timely made.

9 2. *Auto-Enrollment – BDP and AFP*

10 **Q: Ms. Mechling and Pittsburgh Water insist on operating AFP and BDP as separate**
11 **programs, please summarize their position in response to your direct testimony.**

12 A: In my direct testimony, I explain that Pittsburgh Water continues to operate its BDP and
13 AFP as separate programs.³⁵ In my view, this is counterproductive and minimizes the effectiveness
14 of both programs in accomplishing their goals. I recommend that BDP customers with arrears, who
15 are not already enrolled in the AFP, be enrolled in the AFP within 60 days of the effective date of
16 the final Commission approved rates, and that Pittsburgh Water work with its LIAAC on related
17 outreach and education.³⁶ I also recommend that all customers who enroll in the BDP following
18 the effective date of these changes should be automatically enrolled in the new AFP without
19 additional application or required steps.³⁷

³⁵ OWT St. 1 at 64-65.

³⁶ Id. at 66: 1-15.

³⁷ Id.

1 Ms. Mechling opposes these recommendations, and argues simply that the Authority’s team
2 is diligent in evaluating new AFP participants’ eligibility for the BDP.³⁸ Ms. Mechling disagrees
3 with my assessment that the AFP and BDP operate as separate programs because the AFP is only
4 available to customers who qualify for the BDP.³⁹ Despite alleging that the Programs operate in
5 tandem, Ms. Mechling argues that cross-enrollment of existing BDP participants is inappropriate
6 because customers will be forced into programs without their consent or knowledge, and thus set
7 them up for failure.⁴⁰

8 **Q: What is your response.**

9 A: I disagree with Ms. Mechling. First, BDP and AFP operate as separate programs because
10 they require separate enrollment. Despite being coordinated in certain ways, customers must
11 separately be enrolled in the AFP, and there are many BDP accounts which carry balances but were
12 not enrolled in the AFP.⁴¹ Indeed, Ms. Mechling’s opposition to cross-enrollment in the AFP, as I
13 recommend, is evidence that these programs are not fully integrated.

14 Second, I acknowledge that an argument could be made under the existing BDP that
15 households should not be enrolled in AFP without first explaining the payment agreement
16 requirements necessary to earn forgiveness. However, Ms. Mechling clarified that there is no co-
17 payment or payment arrangement requirement in the AFP as proposed in this case. To earn
18 forgiveness of debt under the program proposed by the Authority, all that the customer is required
19 to do is make their BDP payment. While this should be explained to customers, it is not a separate

³⁸ Pittsburgh Water St. 6R at 21: 15-25.

³⁹ Id.

⁴⁰ Id. at 21-22.

⁴¹ See OWT St. 1 at 64 at 15-17. (“For customers not enrolled in the AFP, Pittsburgh Water indicates that, if a customer reaches out to its PGH2O Cares team related to an account balance and/or related to the BDP, they are vetted for the AFP.”) (internal citation omitted) See also OWT St. 1 at 64: 12-20 (showing that of the 8,538 customers enrolled in BDP as of July 2025, 976 of these BDP accounts carried balanced but were not enrolled in BDP).

1 program with separate requirements and should not be treated as such by Pittsburgh Water. Thus,
2 I stand by my recommendations set forth in my direct testimony related to integration of the BDP
3 and AFP.⁴²

4 3. *AFP Data Tracking*

5 **Q: Please summarize Ms. Mechling’s rebuttal regarding AFP data tracking.**

6 A: In my direct testimony, I recommended that Pittsburgh Water implement meaningful data
7 tracking related to the AFP, including tracking and reporting of the specific metrics outlined more
8 fully in my direct testimony.⁴³ Ms. Mechling, while not expressing disagreement with the specific
9 metrics that I recommended, argues that “a collaborative effort with *all* stakeholders is the better
10 way to reach mutual agreement about what Pittsburgh Water can and should track.”⁴⁴

11 **Q: What is your response?**

12 A: I agree that a collaborative effort through the LIAAC is helpful to determine the full scope
13 of data that Pittsburgh Water should be tracking related to the AFP. Seeking the view of other
14 voices and implementing the tracking of basic information are not mutually exclusive. The data
15 tracking that I recommend is a baseline of AFP data that Pittsburgh Water should be required to
16 track and report, as this data is essential to determining the accessibility and efficacy of the AFP. I
17 further recommend that Pittsburgh Water also be required to consult with its LIAAC related to
18 additional AFP data which should be tracked. I recommend that this additional data tracking be
19 implemented within 6 months of the effective date of rates in this proceeding, and that Pittsburgh
20 Water be required to report on these additional metrics to its LIAAC on a quarterly basis.

⁴² OWT St. 1 at 65: 1-6.

⁴³ *Id.* at 66-67.

⁴⁴ Pittsburgh Water St. 6R at 22: 13-20.

1 **B. Bill Discount Program**

2 **Q: Please summarize Ms. Mechling’s rebuttal testimony concerning your**
3 **recommendations to revise the structure and discount levels of the BDP.**

4 A: In my direct testimony, I explain that Pittsburgh Water’s BDP proposal would not maintain
5 current burden levels for most BDP participants and would result in unaffordable burden levels for
6 many program participants, particularly those with lower income and higher usage levels.⁴⁵

7 Ms. Mechling opposes my recommended changes to the BDP.⁴⁶ She argues that my
8 recommendations would require billing software changes, costs related to retaining customer
9 service personnel and to revise materials, and costs related to additional recommended discounts.⁴⁷

10 Ms. Mechling similarly argues that the additional costs incurred by my recommendations will
11 increase the risk that Pittsburgh Water will receive less revenue.⁴⁸ Ms. Mechling specifically points
12 to my recommendation that Pittsburgh Water provide a 60% discount of consumption conveyance
13 charges to include all customers with a FPL at 0-100% FPL.⁴⁹ She argues that this reform will
14 result in an additional \$731,493 in lost base rate revenue.⁵⁰ She also opposes my proposed changes
15 to the BDP bill credits, arguing that this change would result in an additional \$1,134,090 in
16 foregone revenue in 2026.⁵¹

17 Ms. Mechling similarly disagrees with my recommendation that Pittsburgh Water should
18 be required to implement changes to its BDP in 2026, with the effective date of rates.⁵² Ms.
19 Mechling argues that implementing these changes to the BDP in 2026, rather than 2027, would

⁴⁵ OWT St. 1 at 54-56.

⁴⁶ Pittsburgh Water St. 6R at 25.

⁴⁷ Id. at 25-26.

⁴⁸ Id.

⁴⁹ OWT St. 1 at 57–58.

⁵⁰ Pittsburgh Water St. 6R at 28: 9-19.

⁵¹ Id. at 31: 7-9.

⁵² Id. at 29-30.

1 increase the amount of foregone revenue, including from costs associated with additional training
2 materials and education for customer service personnel.⁵³

3 **Q: What is your response to Ms. Mechling’s rebuttal testimony in opposition to your**
4 **recommended BDP reforms?**

5 A: I agree these reforms would cost money. But in the absence of these critical BDP reforms,
6 the dollars that Ms. Mechling notes above would be assessed directly to low income-BDP-eligible
7 households on their bills, which would render them unaffordable. This is the outcome I am trying
8 to avoid. Instead, I recommend that these costs be incurred as a part of the program, paid for by all
9 ratepayers, thus increasing the likelihood that BDP customers receive a bill that they can afford.
10 This results in additional program costs, but not foregone revenue. Since BDP customers have high
11 arrearage levels at current rates and current BDP-discounts,⁵⁴ it is likely that *in the absence of*
12 *program changes* revenue will be foregone in the form of higher uncollectible expenses. My
13 proposal does not negate the Authority’s ability to recover these costs through appropriately set
14 base rates, and results in improved affordability for a targeted group of the most economically
15 vulnerable set of customers. Thus, I disagree with Ms. Mechling’s characterization of these
16 expenses as added costs or foregone revenue.

17 Furthermore, it is important to contextualize that the reforms I recommend to the structure
18 and discount levels of the BDP are designed based on Pittsburgh Water’s proposed BDP structure.
19 I did not propose a new structure for the delivery of rate relief – such as through a percentage of
20 income program – in the context of this proceeding because I want to minimize the administrative
21 complexity for the Authority and the costs of making the changes I recommend. Pittsburgh Water’s
22 own BDP proposals will necessarily require changes to its systems; training and education for its

⁵³ Pittsburgh Water St. 6R at 30: 1-16.

⁵⁴ OWT St. 1 at 49-50.

1 representatives; and consumer outreach and education. It is unclear, and Ms. Mechling does not
2 explain why implementing my proposal would require additional outreach or administrative
3 changes, over and above the changes which must necessarily occur if Pittsburgh Water’s proposals
4 are implemented.

5 Fundamentally, it is imperative that the BDP is designed to provide BDP participants with
6 consistently affordable bills and, in turn, to improve access to safe and reliable services regardless
7 of income. This is sound public policy, and necessary to ensure that Pittsburgh Water’s rates are
8 just and reasonable. As such, I stand firmly by my recommended improvements to the BDP, as
9 outline more fully in my direct testimony.

10 **Q: Pittsburgh Water witness Rocky Craley disagrees with your assessment of the**
11 **affordability of Pittsburgh Water rates which underpin your recommended reforms to**
12 **Pittsburgh Water’s low income assistance programs. Please briefly describe Mr. Craley’s**
13 **rebuttal testimony.**

14 A: Pittsburgh Water witness Rocky Craley attempts to diminish the affordability concerns
15 which underpin my recommendations to improve Pittsburgh Water’s low income assistance
16 programs. Mr. Craley argues that there is no industry standard related to water affordability, and
17 that there are different ways to determine burden levels, including the lowest quantile of income.⁵⁵
18 He argues that Pittsburgh Water has robust assistance programs,⁵⁶ and that affordability concerns
19 raised by myself and OCA witness Mr. Colton largely ignore administrative costs,⁵⁷ which impact
20 all customers,⁵⁸ and a range of other factors – such as the need to invest in system safety and

⁵⁵ Pittsburgh Water St. 9R at 7: 12-21.

⁵⁶ Id. at 6: 1-12.

⁵⁷ Id. at 6: 12-5:5.

⁵⁸ Id. at 5-6.

1 quality.⁵⁹ Mr. Craley argues that there can be reasonable disagreement of what to prioritize, but
2 Pittsburgh Water is committed to improving benefits to low income customers within limits.⁶⁰

3 Despite arguing against my assessment of low income rate affordability in Pittsburgh
4 Water’s service territory, Mr. Craley admits that Raftelis, who drafted the Household Affordability
5 Analysis, did not (1) determine the affordability threshold for individual households in the
6 Pittsburgh Water’s service area; or (2) play a role in designing the proposed enhancements to the
7 customer assistance programs.⁶¹ Mr. Craley further admits that Pittsburgh Water has acknowledged
8 that affordability concerns exist in “a portion of the service population”⁶², and that “there are
9 significant bill burdens for low income households, especially those with high usage.”⁶³

10 **Q: What is your response to Mr. Craley’s rebuttal testimony.**

11 A: Mr. Craley claims that there are various ways to assess affordability and burden levels
12 borne by low income customers. These claims attempt to complicate and thereby obscure the clear
13 weight of evidence that Pittsburgh’s low income customers are struggling with unmanageable
14 monthly burdens, even before any rate increase is permitted through the present proceeding. I do
15 not dispute that other methods may exist to assess the affordability and burden levels for low
16 income customers. However, as discussed in my direct testimony, the current consensus is that, to
17 be affordable, the combined cost of water and wastewater services should not exceed 2.5-4% of
18 household income.⁶⁴ In addition, I have already discussed at length my concerns of measuring
19 burden levels based on the lowest quantile of income, which fails to account for a number of

⁵⁹ Id. at 12: 13-22.

⁶⁰ Id. at 12: 13-22.

⁶¹ Id. at 8: 1-13.

⁶² Id. at 12: 1-2.

⁶³ Id. at 12: 4-5.

⁶⁴ OWT St. 1 at 21: 1-8.

1 important factors, including household size.⁶⁵ Mr. Craley does not address these concerns, or
2 indicate what he believes is a more accurate baseline to calculate burden levels.

3 Mr. Craley also generally argues against my analyses and recommendations to improve
4 affordability for Pittsburgh Water’s low income customers and argues that Pittsburgh Water must
5 consider and prioritize other factors, including impacts on all customers.⁶⁶ I disagree with Mr.
6 Craley’s premise that ensuring that low income customers are able to afford services disadvantages
7 other consumers. Low income assistance programs, when properly designed, are meant to serve as
8 an alternative path to collections, and provide tangible benefits to all ratepayers, including by
9 helping to reduce payment troubles and control uncollectible expenses. For these assistance
10 programs to achieve program goals, these programs must deliver holistic services designed to
11 meaningfully address bill unaffordability. Failure to deliver consistent and affordable bills
12 undermines the ability of the program to reduce collections activities, uncollectible expenses, and
13 termination rates.

14 Importantly, Pittsburgh Water’s low income customers make up a significant portion of its
15 customer base, with Pittsburgh Water estimating 26,834 customers to be low income (at or below
16 200% FPL).⁶⁷ Contrary to Mr. Craley’s arguments, affordability for these struggling customers
17 must be prioritized. I continue to support the recommendations I made in direct about the need to
18 apply the volumetric discount to all customers from 0-100% of the federal poverty level, and to
19 change the fixed discounts for each tier to properly address affordability.⁶⁸

⁶⁵ OWT St. 1 at 43.

⁶⁶ Pittsburgh Water St. 9R at 12.

⁶⁷ OWT St. 1 at 16.

⁶⁸ See OWT St. 1 at 58, Table 18. In reviewing the burden tables attached to my direct testimony (Pittsburgh United OWT Exhibit 1a through 1e), I realized that I applied the proposed DSIC to stormwater charges as well as to water and wastewater charges. This had a slight impact on the burden levels in these charts, but it does not make a material difference in my overall analysis. I have attached the revised burden charts as Pittsburgh United OWT Exhibits 1-a through 1-d, corrected.

1 C. Hardship Fund

2 **Q: Please summarize Ms. Mechling’s testimony concerning your recommended**
3 **improvements to Pittsburgh Water’s Hardship Fund.**

4 A: In my direct testimony, I raise concerns that Pittsburgh Water’s Hardship Fund is
5 underfunded and underspending compared to the clear need for grant assistance of its low income
6 customers.⁶⁹ I recommend that Pittsburgh Water be required (1) to modify its Hardship Fund to
7 allow households to qualify for a grant twice per year, regardless of whether the grant is applied
8 to water and wastewater;⁷⁰ (2) screen customers for eligibility for the Hardship Fund, and direct
9 customer service personnel to provide customers with information and referrals to the Hardship
10 Fund if they have past due balance or are facing service terminations; and (3) track additional
11 metrics related to Hardship Fund, as I outline in my direct testimony.⁷¹

12 Ms. Mechling disagrees with my concerns related to Pittsburgh Water’s Hardship Fund.
13 She argues that Pittsburgh Water has significantly increased Hardship Fund grants processed since
14 2023, and that further screening or promotion is inappropriate because the Hardship Fund is
15 “intended to assist a more limited subset of customers in specific situations.”⁷² Ms. Mechling
16 incorrectly argues that allowing customers to access the Hardship Fund grant more than once,
17 regardless if they apply the grant to water/ wastewater, will undermine the AFP by allegedly
18 perpetuating delinquency that is shouldered by other ratepayers.⁷³

⁶⁹ OWT St. 1 at 71-72.

⁷⁰ Id. at 73.

⁷¹ Id. at 73-74.

⁷² Pittsburgh Water St. 6R at 33; 34: 13-15.

⁷³ Id. at 33: 16-34: 7.

1 **Q: What is your response to Ms. Mechling’s rebuttal in opposition to your**
2 **recommendations to reform Pittsburgh Water’s Hardship Fund?**

3 A: While I commend Pittsburgh Water for increasing access to its Hardship Fund in recent
4 years, the Hardship Fund continues to be underspent and underutilized compared the evidenced
5 need for grant assistance amongst Pittsburgh Water low income customers.⁷⁴ To address these
6 concerns, I continue to recommend that Pittsburgh Water take steps to improve its Hardship Fund,
7 including to provide customers with clearer information about how to access the Hardship Fund.⁷⁵
8 These recommendations are designed to improve access to the Hardship Fund to customers who
9 have past due balances, face service termination, or are already terminated.⁷⁶ Contrary to Ms.
10 Mechling’s arguments, these are precisely the customers who should have access to hardship
11 funding to help resolve unmanageable arrears or to address service termination issues.

12 I also disagree with Ms. Mechling that allowing customers to access a Hardship Fund grant
13 twice annually, regardless of whether they apply the grant to water or wastewater, undermines the
14 AFP or perpetuates delinquencies. Pittsburgh Water’s rates, both at present and as proposed, are
15 unaffordable for many of its customers.⁷⁷ Allowing eligible customers to access the Hardship Fund
16 twice annually helps to increase the ongoing unaffordability which may quickly lead to accrued
17 arrears and service terminations. In addition, there are a variety of reasons that a customer may not
18 be able to retire their arrears through the AFP – including the Authority’s insistence on removing
19 customers from AFP if they miss two payments. For these reasons, and the reasons I outline in my
20 direct testimony, I stand by recommended reforms to Pittsburgh Water’s Hardship Fund.

⁷⁴ OWT St. 1 at 69-71.

⁷⁵ *Id.* at 73.

⁷⁶ OWT St. 1 at 73: 9-21.

⁷⁷ *Id.* at 13-14.

1 **D. Line Repair and Water Conservation Program**

2 **Q: Please summarize Ms. Mechling’s rebuttal of your recommendations to improve**
3 **Pittsburgh Water’s Line Repair and Water Conservation Program (LRWC).⁷⁸**

4 A: In my direct testimony, I recommend that Pittsburgh Water take the following steps to
5 improve the assistance and accessibility of the LRWC Program: (1) revise the \$1,600 per-property
6 program benefit to be a target or an average cost per job rather than a strict limit; (2) include a
7 range of comprehensive measures including plumbing issue fixes, conservation kits, and service
8 line repair and replacement, and work with the LIAAC to develop a more comprehensive LRWC
9 Program; (3) eliminate the requirement that LRWC participants be enrolled in the BDP to qualify;
10 (4) target high usage BDP customers for measures; and (5) coordinate with other utilities’ energy
11 efficiency and conservation programs to leverage resources and expand reach.⁷⁹

12 Ms. Mechling disagrees with several of these recommendations.⁸⁰ She argues that
13 Pittsburgh Water already integrates LIAAC coordination related to the Program; coordinates with
14 other home repair programs; coordinates with other utilities; and refers eligible customers to local,
15 state, and federal programs related to health and safety issues.⁸¹ She further argues that the LRWC
16 Program provides flexibility for needed repairs, and that developing a specific list of issues is not
17 an efficient use of time or resources, and may result in issues finding a contractor to perform
18 services.⁸² Ms. Mechling also observes, under the advice of counsel, that Pittsburgh Water does
19 not have statutory or regulatory requirements to offer their programs.⁸³ Ms. Mechling also argues
20 that water conservation kits place the onus on financially struggling customers, and available funds

⁷⁸ In her rebuttal, Ms. Mechling refers to this program as the LRC. In my direct, I referred to it as the LRWC. For consistency, I have maintained using the LRWC.

⁷⁹ OWT St. 1 at 76: 18-20; 80-82.

⁸⁰ Pittsburgh Water St. 6R at 36-37.

⁸¹ Id. at 37: 1-10.

⁸² Id. at 37: 13-27.

⁸³ Id. at 38: 3-12.

1 are better spent on other measures, including increasing the amount allotted for each property
2 repair.⁸⁴

3 **Q: What is your response.**

4 A: I appreciate the additional details provided by Ms. Mechling related to the coordination of
5 LRWC offerings with the LIAAC, and other entities and programs. That said, I strongly disagree
6 with Ms. Mechling’s arguments that my recommendations to improve the LRWC should not be
7 implemented because Pittsburgh Water is not required by statute or regulation to provide this
8 Program. Pittsburgh Water is required to have just and reasonable rates, which are in the public
9 interest. The legal aspects of Pittsburgh Water’s obligations will be addressed through briefing.
10 However, I would note that to access affordable rates, low income customers must also have access
11 to sufficient assistance designed to mitigate unaffordability. Pittsburgh Water’s LRWC Program is
12 essential so that low income customers who cannot otherwise afford to make necessary repairs and
13 upgrades can access these services to reduce their usage levels.

14 I also disagree with Ms. Mechling that providing for more comprehensive measures
15 through the LRWC will limit the flexibility of the program to assist customers. To the contrary,
16 providing for more comprehensive measures through the LRWC Program will help to clarify what
17 repair and conservation measures are offered through the Program, other than repairs to exposed
18 plumbing.⁸⁵ Once additional measures are identified, Pittsburgh Water could retain the ability to
19 address customer needs related to repairs and conservation outside of these measures.

20 Finally, I will withdraw my recommendation that the program include conservation kits as
21 I agree with Ms. Mechling’s concerns about water saving kits being integrated as a component of
22 the comprehensive measures offered through the LRWC Program. I concur that the limited budget

⁸⁴ *Id.* at 38-39.

⁸⁵ OWT St. 1 at 80.

1 would be better spent on more comprehensive measures and continue to recommend that
2 Pittsburgh Water should work with its LIAAC to develop broader and more comprehensive list of
3 measures for this Program.

4 **E. Confirmed Low Income Customer Tracking**

5 **Q: Please summarize Ms. Mechling’s rebuttal testimony related your evaluation of**
6 **Pittsburgh Water’s data concerning its low income customers.**

7 A: In my direct testimony, I explain that Pittsburgh Water’s identification and classification of
8 confirmed low income (CLI) customers is flawed,⁸⁶ and conclude that Pittsburgh Water’s estimated
9 low income customers count is a more accurate baseline to evaluate the affordability and
10 accessibility of Pittsburgh Water’s low income assistance programs.⁸⁷ Utilizing this baseline, I
11 explain that Pittsburgh Water’s low income assistance programs are significantly
12 undersubscribed.⁸⁸

13 Ms. Mechling argues that my attempts to quantify low income customers, and hence unmet
14 need within this customer segment, is inappropriate because I treat estimated low income customer
15 counts as an “absolute” number.⁸⁹ Ms. Mechling argues that an estimated count should not form
16 the basis for determining the success of Pittsburgh Water’s low income assistance programs.⁹⁰ Ms.
17 Mechling points to limited processes utilized by Pittsburgh Water’s PGH2O Cares team to record
18 income and household size information based on BDP applications.⁹¹ Despite these limited

⁸⁶ OWT St. 1 at 17-18.

⁸⁷ Id. at 18: 12-18.

⁸⁸ Id. at 22. See also OCA St. 6 at 37–38. Witness for the Office of Consumer Advocate (OCA) Roger Colton raises similar concerns related to Pittsburgh Water’s identification of its low income customers, and concludes that “Pittsburgh Water maintains no mechanism by which it might reasonably identify a customer as low-income outside the enrollment of that customer in one of Pittsburgh Water’s customer assistance programs.”

⁸⁹ Pittsburgh Water St. 6R at 9.

⁹⁰ Id. at 10: 12-18.

⁹¹ Id. at 11-12.

1 processes, Ms. Mechling argues that broader identification of low income customers would be
2 “intrusive and would require a significant amount of employee time.”⁹²

3 **Q: What is your response?**

4 A: I disagree with Ms. Mechling’s conclusion that it is inappropriate to use Pittsburgh Water’s
5 estimated low income customer count as a baseline for evaluating Pittsburgh Water’s low income
6 assistance programs. Pittsburgh Water’s tracking of its confirmed low income customers is
7 substantially flawed and results in obvious discrepancies. For example, Pittsburgh Water has a
8 higher count of BDP participants than CLI customers, even though Pittsburgh Water’s CLI count
9 is inclusive of BDP customers.⁹³ These discrepancies result in the undercounting of low income
10 customers and render PWSA’s CLI customer count unreliable for the purposes of assessing relative
11 need for assistance. Thus, it is reasonable to use Pittsburgh Water’s own estimated low income
12 customer count as a reasonable proxy for the number of customers in need within its service
13 territory.

14 I also disagree with Ms. Mechling that Pittsburgh Water’s reported processes for
15 identifying and classifying CLI customers are sufficient. From information Ms. Mechling provides
16 in her rebuttal testimony,⁹⁴ it appears that Pittsburgh Water’s primary mechanism to identify CLI
17 customers is when a customer applies for the BDP. This method of classifying CLI customers is
18 circular and only counts those customers who have already applied for assistance to gauge unmet
19 need of low income customers. These customers represent only a narrow subset of customers for
20 whom Pittsburgh Water has information about low income status.

⁹² *Id.* at 12: 6-8.

⁹³ OWT St. 1 at 17-18.

⁹⁴ Pittsburgh Water St. 6R at 11-12. See also OWT St. at 1 at 17: 1-7. Note that Ms. Mechling’s description of how Pittsburgh Water identifies confirmed low income customers appears to contradict earlier information provided in discovery, in which Pittsburgh Water indicated that confirmed low income customers were designated through a variety of means, including when customers qualify for payment arrangements, or receive Hardship Fund or ALCOSAN Clean Water Assistance Fund grants.

1 Finally, I disagree with Ms. Mechling that a more inclusive count of Pittsburgh Water’s
2 CLI customers would be intrusive to customers. Providing customers with the opportunity to
3 provide income information to determine if they qualify for assistance does not require customers
4 to provide such information. In addition, asking the single question of whether customers would
5 like to provide their income to be screened for eligibility in low income assistance programs would
6 not unreasonably complicate customer calls. As such, I stand by my evaluations related to
7 Pittsburgh Water’s tracking and reporting of its low income customers.

8 **Q: Please summarize Ms. Mechling’s rebuttal testimony concerning your**
9 **recommendations that Pittsburgh Water implement additional metrics to assess the**
10 **effectiveness of its enrollment of customers in its low income assistance programs.**⁹⁵

11 A: In my direct testimony, I recommend that Pittsburgh Water be required to implement
12 additional overarching metrics to increase enrollment in its low income assistance programs,⁹⁶
13 including targeting an annual increase of 10% of its BDP enrollment.⁹⁷

14 Ms. Mechling believes that the metrics I recommend are unnecessary to incentivize
15 Pittsburgh Water to enroll more residential customers in low income assistance programs,⁹⁸ and
16 points to Pittsburgh Water’s existing outreach efforts.⁹⁹ Ms. Mechling further argues that there are
17 many reasons why customers may elect not to enroll in an assistance program which are outside
18 of Pittsburgh Water’s control.¹⁰⁰ Despite these arguments, Ms. Mechling concedes that Pittsburgh
19 Water has implemented annual enrollment targets in the past two calendar years.¹⁰¹

⁹⁵ OWT St. 1 at 50–51.

⁹⁶ Id. at 50.

⁹⁷ Id. at 50–51.

⁹⁸ Pittsburgh Water St. 6R at 13: 1-7.

⁹⁹ Id. at 15: 5-13.

¹⁰⁰ Id. at 13: 4-14.

¹⁰¹ Id. at 13: 4-6.

1 **Q: What is your response to Ms. Mechling’s rebuttal of your recommendations that**
2 **Pittsburgh Water implement additional metrics for its low income assistance programs?**

3 A: I disagree with Ms. Mechling that implementing the additional metrics I recommend in my
4 direct testimony are unnecessary. As Ms. Mechling notes, Pittsburgh Water already establishes
5 annual enrollment targets related to its low income assistance programs. Implementing a specific
6 target, as I recommend, helps augment Pittsburgh Water’s existing efforts to increase enrollment
7 in these Programs, and should be viewed as a way to gauge the progress of Pittsburgh Water’s
8 efforts. I stand by recommendations that Pittsburgh Water be required to implement certain metrics
9 related to its low income assistance program enrollment, as I fully outline in my direct testimony.

10 **F. Recovery of Low Income Assistance Program Costs**

11 **Q: Please summarize OSBA witness Mr. Kubas’s rebuttal testimony related to cost**
12 **recovery for low income assistance programs.**

13 A: Ms. Kubas explains in his rebuttal that Pittsburgh Water claimed certain costs associated
14 with its Hardship Fund; the Leak Credit Program; Arrearage Forgiveness Program; and the Service
15 Line Repair Program – to be recovered from all customers, excluding contract and public fire
16 customers.¹⁰² Consistent with his positions in direct testimony, Mr. Kubas recommends that
17 customer assistance program costs be recovered from residential customers, excluding stormwater
18 customers.¹⁰³ Mr. Kubas estimates that these recommendations would increase the revenue
19 requirement for the residential class by approximately \$2.8 million, decrease the revenue
20 requirement for the commercial class by approximately \$1.7 million, and decrease the revenue
21 requirement for all other classes by approximately \$1.1 million.¹⁰⁴ In addition, while Mr. Kubas

¹⁰² OSBA 1-R at 3: 6-17.

¹⁰³ Id. at 3-4.

¹⁰⁴ Id. at 4: 4-13.

1 does not object to my recommendations in direct, he again emphasizes that customer assistance
2 program costs should be recovered from the residential class.¹⁰⁵

3 **Q: What is your response to Mr. Kubas’s rebuttal testimony related to recovery of low**
4 **income assistance programs?**

5 A: In my rebuttal testimony, I explain in extensive detail why Mr. Kubas’s recommendation
6 related to recovery of low income assistance program costs should be rejected.¹⁰⁶ These programs
7 are intended to remediate the impacts of poverty and utility insecurity which impact all customers,
8 and it is therefore inappropriate to recovery program costs solely from residential customers.¹⁰⁷
9 After review of Mr. Kubas’s rebuttal, I stand by my recommendation that the Commission reject
10 Mr. Kubas’s proposal.¹⁰⁸

11 **III. Payment Arrangements Standards**

12 **Q: Please summarize Ms. Mechling’s rebuttal testimony related to payment**
13 **arrangements.**

14 A: In my direct testimony, I explained that Pittsburgh Water’s procedures for issuing payment
15 arrangements for customers with medical certificates are not appropriately flexible. I recommend
16 that Pittsburgh Water develop clear guidelines that allow more flexible payment arrangements for
17 medically vulnerable households that obtain a medical certificate to prevent termination of service
18 which may exacerbate an acute illness or medical condition.¹⁰⁹ The goal of my recommendation
19 is to ensure that households have a bill that they can pay and remain connected to essential services
20 during a medical crisis. Since a medical certificate only pauses termination of service, and does

¹⁰⁵ Id. at 7: 9-14.

¹⁰⁶ OWT St. 1-R at 3-8.

¹⁰⁷ Id. at 3-8.

¹⁰⁸ Id. at 8: 1-7.

¹⁰⁹ Id. at 98-100.

1 not necessarily resolve the underlying payment trouble, it is imperative that the Authority allow
2 flexibility for these households to remain connected.

3 Ms. Mechling disagrees with these recommendations.¹¹⁰ She argues that Pittsburgh Water
4 is not required to provide additional flexibility related to payment arrangements, and that providing
5 flexibility would be time-consuming and costly.¹¹¹ While opposing my recommendations, Ms.
6 Mechling acknowledges that Pittsburgh Water does follow Section 56.151(3) related to negotiating
7 a reasonable payment arrangement for customers who dispute their bills.¹¹²

8 I note that Ms. Mechling, in responding to OCA witness Barbara Alexander’s direct
9 testimony, also makes concerning and inaccurate arguments related to issuing payment
10 arrangements.¹¹³ Specifically, Ms. Mechling claims that customer’s personal decisions drive their
11 payment plan success or failure, and customers may not succeed in these plans for a variety of
12 reasons, including decisions “to make a purchase in lieu of plan payment.”¹¹⁴ Ms. Mechling
13 concludes that Pittsburgh Water has no influence over factors affecting customers maintaining
14 payment plans, and they should not have to further evaluate the success/ failure of plans as Ms.
15 Alexander proposes.¹¹⁵

16 **Q: What is your response to Ms. Mechling?**

17 A: I disagree with Ms. Mechling’s conclusion that improvements to Pittsburgh Water’s
18 payment arrangement processes – particularly for those with medical certificates – are unnecessary
19 and specifically disagree with her conclusion that customers’ success or failure in payment
20 arrangements are driven by their personal decisions. As discussed extensively in my direct

¹¹⁰ Pittsburgh Water St. 6R at 55: 1-17.

¹¹¹ Pittsburgh Water St. 6R at 55: 1-17.

¹¹² *Id.* at 55: 1-17.

¹¹³ *Id.* at 52.

¹¹⁴ *Id.* at 52-53.

¹¹⁵ *Id.* at 53: 1-9.

1 testimony, Pittsburgh Water’s rates are already unaffordable for many of its customers, particularly
2 those customers with the lowest income levels. Pittsburgh Water’s payment plans add payment
3 obligations to these already unaffordable monthly bills. In my extensive experience advocating for
4 low income utility consumers, struggling customers often default on payment plans because they
5 are simply unable to keep up with these significant payment requirements. Contrary to Ms.
6 Mechling’s arguments, Pittsburgh Water certainly has control over the underlying affordability of
7 customers’ monthly payments.

8 I continue to submit that Pittsburgh Water should be required to provide additional
9 flexibility for payment arrangements provided to customers with medical certificates. Pittsburgh
10 Water’s continued refusal to do so, deprives these customers of a reasonable way of addressing
11 their accrued arrears which ultimately leads to loss of service. It is therefore essential that
12 Pittsburgh Water’s payment arrangement procedures, including payment arrangements provided
13 to customers with medical certificates, be appropriately flexible, as I recommend in detail in my
14 direct testimony.

15 **IV. Stormwater**

16 **A. Stormwater Investment and Planning**

17 **Q: Please summarize Ms. Mechler’s rebuttal testimony concerning your**
18 **recommendations related to Pittsburgh Water’s stormwater planning and investments.**

19 A: In my direct testimony, I explain that Pittsburgh Water has made certain commitments
20 related to stormwater mitigation projects which they have chosen not to meet.¹¹⁶ I recommend that
21 Pittsburgh Water more closely follow its stormwater strategic plan, prioritize projects that were

¹¹⁶ OWT St. 1 at 84: 16 – 86: 9.

1 deferred for funding based on ranking in the Plan,¹¹⁷ and more clearly communicate with
2 stakeholders within impacted projects and watersheds, including through annual progress
3 reports.¹¹⁸

4 Ms. Mechler asserts that I misunderstand the purpose of the Stormwater Strategic Plan
5 (Plan),¹¹⁹ which she claims is merely “aspirational.”¹²⁰ Ms. Mechler also argues that it is unclear
6 whether options in the Plan are even technically feasible, and that the Plan does not include specific
7 projects or timelines for completion.¹²¹ Instead of utilizing the Plan as a roadmap for stormwater
8 projects, Ms. Mechler indicates that Pittsburgh Water determines stormwater spending based on a
9 variety of factors, has prioritized other investments,¹²² and has not prioritized any specific areas or
10 communities for stormwater investment.¹²³

11 Ms. Mechler also disagrees with my attempts to shed light on the stormwater issues faced
12 by Four Mile Run.¹²⁴ Ms. Mechler indicates that Pittsburgh Water anticipates additional
13 stormwater planning, including development of a master plan, but indicates that Pittsburgh Water
14 does not have funding to undertaking such planning.¹²⁵ Instead, Ms. Mechler points to past efforts
15 related to stormwater outreach and education,¹²⁶ and related to the OWT Stormwater Working
16 Group.¹²⁷

¹¹⁷ *Id.* at 87: 9-20.

¹¹⁸ *Id.* at 87-88.

¹¹⁹ Pittsburgh Water St. 4R at 3: 6-10.

¹²⁰ *Id.* at 3: 16-34.

¹²¹ *Id.* at 4: 16-23.

¹²² *Id.* at 5: 1-10; 13: 7-22.

¹²³ *Id.* at 4: 14-16.

¹²⁴ *Id.* at 17-19. Ms. Mechler also disagrees with my attempts to shed light on the stormwater issues faced by Four Mile Run (Run). Ms. Mechler argues the Run project is not advancing because (1) stormwater management is complex;¹²⁴ (2) the project scope was changed in 2022 to not include Schenley Park; (3) certain constructability risks were identified; (4) certain easements and permits for the project were not granted; and (5) as a result of certain funding limitations.¹²⁴ Ms. Mechler indicates that final design work related to the project is on hold.¹²⁴

¹²⁵ *Id.* at 5: 11-20.

¹²⁶ *Id.* at 6: 9-12.

¹²⁷ *Id.* at 8.

1 **Q: What is your response?**

2 A: I understand that stormwater investment can be complex. The complexity of these
3 investments makes it more important that Pittsburgh Water have transparent planning and
4 communication related to its stormwater projects. Currently, Pittsburgh Water indicates that its
5 Stormwater Strategic Plan is purely “aspirational” and that it largely does not adhere to it for a
6 variety of stated reasons, including because the Authority has not evaluated whether Plan items
7 are technically feasible. It thus appears that Pittsburgh Water’s strategic plan is neither strategic
8 nor a plan. While Ms. Mechler points to a variety of stormwater outreach events, these specific
9 events do not substitute for broader planning and communication related to stormwater priorities,
10 investments, and progress.

11 I am also concerned with Ms. Mechler’s arguments that Pittsburgh Water cannot improve
12 its stormwater planning, and communications related to stormwater investments, because of a lack
13 of funding. As I have described throughout my direct and surrebuttal testimonies, Pittsburgh Water
14 is asking for a substantial rate increase in this proceeding, including increases to stormwater fees.
15 While I understand that available funds must be prioritized in certain ways, Pittsburgh Water’s
16 prioritization of funds should be transparent, and based on clear goals and priorities as outlined in
17 its planning documents. To that end, I continue to stand by the recommendations in my direct
18 testimony.¹²⁸

¹²⁸ OWT St. 1 at 87-88.

1 **B. Damaged Wastewater Laterals**

2 **Q: Please summarize Ms. Mechler’s rebuttal to your analysis and recommendations**
3 **related to Damaged Wastewater Service Laterals (DWSL).**

4 A: In my direct testimony, I explain that Pittsburgh Water has failed to refile a petition for the
5 repair and replacements of DWSLs after the Commission rejected Pittsburgh Water’s petition
6 without prejudice because Pittsburgh Water failed to meet the requirements of Act 120.¹²⁹ I
7 recommend that Pittsburgh Water be required to file another DWSL Petition within 90 days of the
8 effective date of rates in this proceeding.¹³⁰

9 Ms. Mechler argues that Pittsburgh Water did not refile the Petition because the
10 Commission found that an Act 120 program could not be structured in a way that would address
11 Pittsburgh Water’s circumstances as a largely combined system.¹³¹ Ms. Mechler argues that the
12 Commission did not approve Pittsburgh Water’s request for modification to align the purpose of
13 Act 120 with its system.¹³²

14 **Q: What is your response to Ms. Mechler’s rebuttal to your recommendations related**
15 **to Pittsburgh Water’s DWSL petition?**

16 A: I stand by my recommendation that Pittsburgh Water should be required to file a new
17 Petition related to DWSL with the Commission and in conformity with the requirements of Act
18 120. While Ms. Mechler initially indicated that Pittsburgh Water’s choice to not file a modified
19 petition was a result of consent decree negotiations,¹³³ it appears that Pittsburgh Water has decided
20 to forgo – rather than delay – filing its DWSL proposal. This raises serious concerns about the

¹²⁹ Id. at 95-96.

¹³⁰ OWT St. 1 at 97: 1-14.

¹³¹ Pittsburgh Water St. 4R at 24-25.

¹³² Id. at 25: 16-25.

¹³³ OWT St. 1 at 96: 7-11.

1 health and safety impacts of damaged wastewater laterals for households who bear significant
2 expenses associated with repair of these laterals – and these household’s surrounding
3 neighborhoods.¹³⁴

4 I also disagree with Ms. Mechler that the Commission found that an Act 120 program could
5 not be structured in a way that would address Pittsburgh Water’s circumstances as a largely
6 combined system. While legal analyses related to the Commission Order are reserved for briefing,
7 it appears that the Commission rejected Pittsburgh Water’s Petition because it failed to meet, or
8 was unclear about, the requirements set forth in Act 120.¹³⁵ The Commission dismissed Pittsburgh
9 Water’s DWSL Petition without prejudice so that “[i]f PWSA-WD desires to implement a DWSL
10 program pursuant to Act 120 of 2018 (Act 120), it may file a new petition that complies with
11 Commission regulations.”¹³⁶ There is no indication that the Commission found that Pittsburgh
12 Water’s systems were somehow unreconcilable with Act 120 requirements.

13 **V. Miscellaneous Issues**

14 **Q: What issues will you be addressing in this section of your testimony?**

15 A: I will be addressing Ms. Mechling’s response to my alternative proposal regarding
16 electronic billing credits, the Authority’s position that credit and debit cards fees should be paid
17 for by customers, not the Authority, and her rejection of my proposal to include cash payments
18 made by consumers in the fees absorbed by the Authority.

¹³⁴ Id. at 96-97.

¹³⁵ Petition of Pittsburgh Water and Sewer Authority – Wastewater Division for Approval of its Damaged Wastewater Sewer Lateral Program, Order, Docket No. P-2022-3031586; R-2022-3031597, at 13-14 (Order entered Dec. 29, 2022) (DWSL Order).

¹³⁶ DWSL Order at 3.

1 **Q: Please summarize Ms. Mechling’s response to your proposal to allocate the electronic**
2 **bill credit as \$2.50 per month for 6 months with no prohibition to switch back to a paper bill**
3 **rather than \$15 per account and a 6-month prohibition for returning to paper billing.**

4 A: In her rebuttal, Ms. Mechling does not support my recommendation because she asserts
5 that the programming would be more expensive, it would introduce more points of failure in the
6 identification of eligible customers and posting of the credit. She also asserts that any customer
7 could call the call center to receive a mailed or emailed copy of their bill if they cannot access their
8 electronic copy.¹³⁷

9 **Q: What is your response to these concerns?**

10 A: I accept Mr. Mechling’s explanation as to why the Authority chose to implement this as a
11 single \$15 credit rather than a monthly credit of \$2.50 for 6 months. I am not interested in creating
12 unnecessary complexity for the Authority as to this issue and my recommendation was meant
13 merely to accommodate the same structure it proposed with the same result, but without locking
14 in or penalizing a customer who realizes that electronic billing does not meet their needs. Because
15 all customers can continue to receive their bill mailed to them, and even customers who opt in to
16 electronic billing can call and request a copy of their bill be mailed to them, I will withdraw my
17 alternative proposal to split the credit up monthly. However, I continue to oppose the Authority’s
18 proposal that customers are prohibited from returning to a mailed paper bill for 6 months. As noted
19 in my direct testimony, customers may realize after they switch that they would prefer a paper bill
20 and should not be prohibited from receiving one. Thus, my revised recommendation is that
21 customers be permitted to return to receiving a mailed bill at any time, but that if they do so within

¹³⁷ Pittsburgh Water St. 6R at 57.

1 the first 6 months, that the Authority be permitted to reverse the credit that was initially applied
2 after explaining this fact to the customer.

3 **Q: Please summarize the reasons why the Authority continues to insist on removing**
4 **credit and debit card fees from rates and requiring customers to pay for them directly.**

5 A: Ms. Mechling and the Authority continue to take the position that this is a rate mitigation
6 decision and present evidence that 73% of customers do not use credit or debit cards to pay their
7 utility bill.¹³⁸ She also asserts that customers can avoid any fees by paying with other options, and
8 asserts that it is “Pittsburgh Water’s goal to enroll *all* customers in ACH payment in the future.”¹³⁹
9 Regarding my recommendation that the Authority allow for additional fee-free payment options
10 for customers – including payment by non-bank applications such as Venmo, CashApp, Paypal,
11 ApplePay and GooglePay, she indicated that these methods are available to customers as of March
12 2025, but indicated that “payment processing fees are still incurred.”¹⁴⁰ Finally, with regard to
13 allowing customers who pay with cash to pay without a fee, Ms. Mechling says that the Authority
14 does not have the resources available to pursue this option.¹⁴¹

15 **Q: What is your response?**

16 A: I stand by my recommendations in my direct testimony. I do not support the reimposition
17 of these fees onto customers directly. The use of credit cards and debit cards is a routine form of
18 payment where most merchants do not impose a surcharge and Pittsburgh Water should not
19 reimpose these fees onto customers. While I recognize that there is a cost associated with the
20 processing of these payments, there is a cost associated with the processing of all payments. For
21 example, Ms. Mechling’s testimony makes clear that 42% of all payments still arrive via mailed

¹³⁸ *Id.* at 59.

¹³⁹ Pittsburgh Water St. 6R at 60:7 (emphasis added).

¹⁴⁰ *Id.* at 61:9.

¹⁴¹ *Id.* at 62.

1 check or money order. Someone must collect these payments, deposit them, and post them to the
2 correct account. There are costs associated with this that are a part of rates. Payment of electronic
3 processing fees is no different, these fees are just more apparent. While I understand that the
4 Authority hopes to transition all customers to ACH, this is neither realistic in the short run nor
5 inevitable that all customers will want to or be able to make this transition. Based on the data
6 provided by the Authority, 69% of all customers pay by means other than ACH.¹⁴² Furthermore,
7 as I state in my direct low income customer are far less likely to use ACH than other groups of
8 customers – with households at income of less than \$25,000 per year using ACH for bill payment
9 only 6% of the time.¹⁴³ Thus, I maintain my recommendation that the Authority continue to cover
10 these fees.

11 Regarding the recently launched additional means of payment in March 2025, it is not clear
12 whether the Authority is covering the fees for these services and/or they are being assessed to
13 customers. If the latter, it is my position that these fees should be included in the fees paid through
14 rates like other electronic payment fees.

15 Finally, regarding my recommendation that the Authority begin covering the cost of
16 making cash payments at authorized retailers, I continue to support this recommendation. There
17 is no other means for a customer to pay their bill with cash and given the propensity of low income
18 households to be far more likely to pay with cash than other methods,¹⁴⁴ I submit that it is
19 reasonable for the Authority to ensure that this option is available to customers without payment
20 of a fee. Simply put, customers should not have to pay a fee to pay their bill with cash.

¹⁴² Id. at 59.

¹⁴³ OWT St. 1 at 92, Table 23.

¹⁴⁴ Id. (showing that 32% of payments for households with income less than \$25,000 is made with cash).

1 Q: Does this conclude your rebuttal testimony.

2 A: Yes.

Pittsburgh United OWT Statement 1, Cicero

Exhibit 1, corrected - Burden Tables

Pittsburgh UNITED Our Water Table Exhibit 1-a
Water/Wastewater/Stormwater Burden Tables
Current Full Tarriff vs. Current BPD

Corrected

2 Person Household							
	Income	PWSA Monthly (\$) CURRENT	PWSA Annual (\$) CURRENT	Burden (%) CURRENT	PWSA Monthly (\$) BDP CURRENT	PWSA Annual (\$) BDP CURRENT	Burden (%) PWSA BDP CURRENT
1000 Gal.							
50% FPL	\$ 10,575	\$ 72.11	\$ 865.32	8.18%	\$ 21.78	\$ 261.36	2.47%
100% FPL	\$ 21,150	\$ 72.11	\$ 865.32	4.09%	\$ 21.78	\$ 261.36	1.24%
150% FPL	\$ 31,725	\$ 72.11	\$ 865.32	2.73%	\$ 21.78	\$ 261.36	0.82%
200% FPL	\$ 42,300	\$ 72.11	\$ 865.32	2.05%	\$ 21.78	\$ 261.36	0.62%
3000 Gal							
50% FPL	\$ 10,575	\$ 144.38	\$ 1,732.56	16.38%	\$ 64.98	\$ 779.76	7.37%
100% FPL	\$ 21,150	\$ 144.38	\$ 1,732.56	8.19%	\$ 94.05	\$ 1,128.60	5.34%
150% FPL	\$ 31,725	\$ 144.38	\$ 1,732.56	5.46%	\$ 94.05	\$ 1,128.60	3.56%
200% FPL	\$ 42,300	\$ 144.38	\$ 1,732.56	4.10%	\$ 94.05	\$ 1,128.60	2.67%
6000 Gal							
50% FPL	\$ 10,575	\$ 252.77	\$ 3,033.24	28.68%	\$ 129.79	\$ 1,557.48	14.73%
100% FPL	\$ 21,150	\$ 252.77	\$ 3,033.24	14.34%	\$ 202.45	\$ 2,429.40	11.49%
150% FPL	\$ 31,725	\$ 252.77	\$ 3,033.24	9.56%	\$ 202.45	\$ 2,429.40	7.66%
200% FPL	\$ 42,300	\$ 252.77	\$ 3,033.24	7.17%	\$ 202.45	\$ 2,429.40	5.74%
8000 Gal							
50% FPL	\$ 10,575	\$ 325.04	\$ 3,900.48	36.88%	\$ 172.99	\$ 2,075.88	19.63%
100% FPL	\$ 21,150	\$ 325.04	\$ 3,900.48	18.44%	\$ 274.71	\$ 3,296.52	15.59%
150% FPL	\$ 31,725	\$ 325.04	\$ 3,900.48	12.29%	\$ 274.71	\$ 3,296.52	10.39%
200% FPL	\$ 42,300	\$ 325.04	\$ 3,900.48	9.22%	\$ 274.71	\$ 3,296.52	7.79%

3 Person Household							
	Income	PWSA Monthly (\$) CURRENT	PWSA Annual (\$) CURRENT	Burden (%) CURRENT	PWSA Monthly (\$) BDP CURRENT	PWSA Annual (\$) BDP CURRENT	Burden (%) PWSA BDP CURRENT
1000 Gal.							
50% FPL	\$ 13,325	\$ 72.11	\$ 865.32	6.49%	\$ 21.78	\$ 261.36	1.96%
100% FPL	\$ 26,650	\$ 72.11	\$ 865.32	3.25%	\$ 21.78	\$ 261.36	0.98%
150% FPL	\$ 39,975	\$ 72.11	\$ 865.32	2.16%	\$ 21.78	\$ 261.36	0.65%
200% FPL	\$ 53,300	\$ 72.11	\$ 865.32	1.62%	\$ 21.78	\$ 261.36	0.49%
3000 Gal							
50% FPL	\$ 13,325	\$ 144.38	\$ 1,732.56	13.00%	\$ 64.98	\$ 779.76	5.85%
100% FPL	\$ 26,650	\$ 144.38	\$ 1,732.56	6.50%	\$ 94.05	\$ 1,128.60	4.23%
150% FPL	\$ 39,975	\$ 144.38	\$ 1,732.56	4.33%	\$ 94.05	\$ 1,128.60	2.82%
200% FPL	\$ 53,300	\$ 144.38	\$ 1,732.56	3.25%	\$ 94.05	\$ 1,128.60	2.12%
6000 Gal							
50% FPL	\$ 13,325	\$ 252.77	\$ 3,033.24	22.76%	\$ 129.79	\$ 1,557.48	11.69%
100% FPL	\$ 26,650	\$ 252.77	\$ 3,033.24	11.38%	\$ 202.45	\$ 2,429.40	9.12%
150% FPL	\$ 39,975	\$ 252.77	\$ 3,033.24	7.59%	\$ 202.45	\$ 2,429.40	6.08%
200% FPL	\$ 53,300	\$ 252.77	\$ 3,033.24	5.69%	\$ 202.45	\$ 2,429.40	4.56%
8000 Gal							
50% FPL	\$ 13,325	\$ 325.04	\$ 3,900.48	29.27%	\$ 172.99	\$ 2,075.88	15.58%
100% FPL	\$ 26,650	\$ 325.04	\$ 3,900.48	14.64%	\$ 274.71	\$ 3,296.52	12.37%
150% FPL	\$ 39,975	\$ 325.04	\$ 3,900.48	9.76%	\$ 274.71	\$ 3,296.52	8.25%
200% FPL	\$ 53,300	\$ 325.04	\$ 3,900.48	7.32%	\$ 274.71	\$ 3,296.52	6.18%

4 Person Household							
	Income	PWSA Monthly (\$) CURRENT	PWSA Annual (\$) CURRENT	Burden (%) CURRENT	PWSA Monthly (\$) BDP CURRENT	PWSA Annual (\$) BDP CURRENT	Burden (%) PWSA BDP CURRENT
1000 Gal.							
50% FPL	\$ 16,075	\$ 72.11	\$ 865.32	5.38%	\$ 21.78	\$ 261.36	1.63%
100% FPL	\$ 32,150	\$ 72.11	\$ 865.32	2.69%	\$ 21.78	\$ 261.36	0.81%
150% FPL	\$ 48,225	\$ 72.11	\$ 865.32	1.79%	\$ 21.78	\$ 261.36	0.54%
200% FPL	\$ 64,300	\$ 72.11	\$ 865.32	1.35%	\$ 21.78	\$ 261.36	0.41%
3000 Gal							
50% FPL	\$ 16,075	\$ 144.38	\$ 1,732.56	10.78%	\$ 64.98	\$ 779.76	4.85%
100% FPL	\$ 32,150	\$ 144.38	\$ 1,732.56	5.39%	\$ 94.05	\$ 1,128.60	3.51%
150% FPL	\$ 48,225	\$ 144.38	\$ 1,732.56	3.59%	\$ 94.05	\$ 1,128.60	2.34%
200% FPL	\$ 64,300	\$ 144.38	\$ 1,732.56	2.69%	\$ 94.05	\$ 1,128.60	1.76%
6000 Gal							
50% FPL	\$ 16,075	\$ 252.77	\$ 3,033.24	18.87%	\$ 129.79	\$ 1,557.48	9.69%
100% FPL	\$ 32,150	\$ 252.77	\$ 3,033.24	9.43%	\$ 202.45	\$ 2,429.40	7.56%
150% FPL	\$ 48,225	\$ 252.77	\$ 3,033.24	6.29%	\$ 202.45	\$ 2,429.40	5.04%
200% FPL	\$ 64,300	\$ 252.77	\$ 3,033.24	4.72%	\$ 202.45	\$ 2,429.40	3.78%
8000 Gal							
50% FPL	\$ 16,075	\$ 325.04	\$ 3,900.48	24.26%	\$ 172.99	\$ 2,075.88	12.91%
100% FPL	\$ 32,150	\$ 325.04	\$ 3,900.48	12.13%	\$ 274.71	\$ 3,296.52	10.25%
150% FPL	\$ 48,225	\$ 325.04	\$ 3,900.48	8.09%	\$ 274.71	\$ 3,296.52	6.84%
200% FPL	\$ 64,300	\$ 325.04	\$ 3,900.48	6.07%	\$ 274.71	\$ 3,296.52	5.13%

*Rates Include Tier 2 Stormwater Fee, PennVest Charge, DSIC, and full tariff 2025 Alcosan charges

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2025 federal poverty guidelines.

See HHS Poverty Guidelines for 2025, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Pittsburgh UNITED Our Water Table Exhibit 1-b
Water/Wastewater/Stormwater Burden Tables
Proposed Full Tariff 2026 vs. Proposed BDP 2026

Corrected

2 Person Household							
	Annual Income	PWSA Monthly (\$) 2026	PWSA Annual (\$) 2026	Burden (%) PWSA 2026	PWSA Monthly (\$) BDP 2026	PWSA Annual (\$) BDP 2026	Burden (%) PWSA BDP 2026
1000 Gal.							
50% FPL	\$ 10,575	\$ 81.76	\$ 981.12	9.28%	\$ 23.74	\$ 284.88	2.69%
100% FPL	\$ 21,150	\$ 81.76	\$ 981.12	4.64%	\$ 15.68	\$ 188.16	0.89%
150% FPL	\$ 31,725	\$ 81.76	\$ 981.12	3.09%	\$ 15.68	\$ 188.16	0.59%
200% FPL	\$ 42,300	\$ 81.76	\$ 981.12	2.32%	\$ 15.68	\$ 188.16	0.44%
3000 Gal							
50% FPL	\$ 10,575	\$ 170.36	\$ 2,044.32	19.33%	\$ 74.16	\$ 889.92	8.42%
100% FPL	\$ 21,150	\$ 170.36	\$ 2,044.32	9.67%	\$ 101.05	\$ 1,212.60	5.73%
150% FPL	\$ 31,725	\$ 170.36	\$ 2,044.32	6.44%	\$ 101.05	\$ 1,212.60	3.82%
200% FPL	\$ 42,300	\$ 170.36	\$ 2,044.32	4.83%	\$ 101.05	\$ 1,212.60	2.87%
6000 Gal							
50% FPL	\$ 10,575	\$ 303.25	\$ 3,639.00	34.41%	\$ 149.78	\$ 1,797.36	17.00%
100% FPL	\$ 21,150	\$ 303.25	\$ 3,639.00	17.21%	\$ 229.11	\$ 2,749.32	13.00%
150% FPL	\$ 31,725	\$ 303.25	\$ 3,639.00	11.47%	\$ 229.11	\$ 2,749.32	8.67%
200% FPL	\$ 42,300	\$ 303.25	\$ 3,639.00	8.60%	\$ 229.11	\$ 2,749.32	6.50%
8000 Gal							
50% FPL	\$ 10,575	\$ 391.85	\$ 4,702.20	44.47%	\$ 200.19	\$ 2,402.28	22.72%
100% FPL	\$ 21,150	\$ 391.85	\$ 4,702.20	22.23%	\$ 314.49	\$ 3,773.88	17.84%
150% FPL	\$ 31,725	\$ 391.85	\$ 4,702.20	14.82%	\$ 314.49	\$ 3,773.88	11.90%
200% FPL	\$ 42,300	\$ 391.85	\$ 4,702.20	11.12%	\$ 314.49	\$ 3,773.88	8.92%

3 Person Household							
	Annual Income	PWSA Monthly (\$) 2026	PWSA Annual (\$) 2026	Burden (%) PWSA 2026	PWSA Monthly (\$) BDP 2026	PWSA Annual (\$) BDP 2026	Burden (%) PWSA BDP 2026
1000 Gal.							
50% FPL	\$ 13,325	\$ 81.76	\$ 981.12	7.36%	\$ 23.74	\$ 284.88	2.14%
100% FPL	\$ 26,650	\$ 81.76	\$ 981.12	3.68%	\$ 15.68	\$ 188.16	0.71%
150% FPL	\$ 39,975	\$ 81.76	\$ 981.12	2.45%	\$ 15.68	\$ 188.16	0.47%
200% FPL	\$ 53,300	\$ 81.76	\$ 981.12	1.84%	\$ 15.68	\$ 188.16	0.35%
3000 Gal							
50% FPL	\$ 13,325	\$ 170.36	\$ 2,044.32	15.34%	\$ 74.16	\$ 889.92	6.68%
100% FPL	\$ 26,650	\$ 170.36	\$ 2,044.32	7.67%	\$ 101.05	\$ 1,212.60	4.55%
150% FPL	\$ 39,975	\$ 170.36	\$ 2,044.32	5.11%	\$ 101.05	\$ 1,212.60	3.03%
200% FPL	\$ 53,300	\$ 170.36	\$ 2,044.32	3.84%	\$ 101.05	\$ 1,212.60	2.28%
6000 Gal							
50% FPL	\$ 13,325	\$ 303.25	\$ 3,639.00	27.31%	\$ 149.78	\$ 1,797.36	13.49%
100% FPL	\$ 26,650	\$ 303.25	\$ 3,639.00	13.65%	\$ 229.11	\$ 2,749.32	10.32%
150% FPL	\$ 39,975	\$ 303.25	\$ 3,639.00	9.10%	\$ 229.11	\$ 2,749.32	6.88%
200% FPL	\$ 53,300	\$ 303.25	\$ 3,639.00	6.83%	\$ 229.11	\$ 2,749.32	5.16%
8000 Gal							
50% FPL	\$ 13,325	\$ 391.85	\$ 4,702.20	35.29%	\$ 200.19	\$ 2,402.28	18.03%
100% FPL	\$ 26,650	\$ 391.85	\$ 4,702.20	17.64%	\$ 314.49	\$ 3,773.88	14.16%
150% FPL	\$ 39,975	\$ 391.85	\$ 4,702.20	11.76%	\$ 314.49	\$ 3,773.88	9.44%
200% FPL	\$ 53,300	\$ 391.85	\$ 4,702.20	8.82%	\$ 314.49	\$ 3,773.88	7.08%

4 Person Household							
	Annual Income	PWSA Monthly (\$) 2026	PWSA Annual (\$) 2026	Burden (%) PWSA 2026	PWSA Monthly (\$) BDP 2026	PWSA Annual (\$) BDP 2026	Burden (%) PWSA BDP 2026
1000 Gal.							
50% FPL	\$ 16,075	\$ 81.76	\$ 981.12	6.10%	\$ 23.74	\$ 284.88	1.77%
100% FPL	\$ 32,150	\$ 81.76	\$ 981.12	3.05%	\$ 15.68	\$ 188.16	0.59%
150% FPL	\$ 48,225	\$ 81.76	\$ 981.12	2.03%	\$ 15.68	\$ 188.16	0.39%
200% FPL	\$ 64,300	\$ 81.76	\$ 981.12	1.53%	\$ 15.68	\$ 188.16	0.29%
3000 Gal							
50% FPL	\$ 16,075	\$ 170.36	\$ 2,044.32	12.72%	\$ 74.16	\$ 889.92	5.54%
100% FPL	\$ 32,150	\$ 170.36	\$ 2,044.32	6.36%	\$ 101.05	\$ 1,212.60	3.77%
150% FPL	\$ 48,225	\$ 170.36	\$ 2,044.32	4.24%	\$ 101.05	\$ 1,212.60	2.51%
200% FPL	\$ 64,300	\$ 170.36	\$ 2,044.32	3.18%	\$ 101.05	\$ 1,212.60	1.89%
6000 Gal							
50% FPL	\$ 16,075	\$ 303.25	\$ 3,639.00	22.64%	\$ 149.78	\$ 1,797.36	11.18%
100% FPL	\$ 32,150	\$ 303.25	\$ 3,639.00	11.32%	\$ 229.11	\$ 2,749.32	8.55%
150% FPL	\$ 48,225	\$ 303.25	\$ 3,639.00	7.55%	\$ 229.11	\$ 2,749.32	5.70%
200% FPL	\$ 64,300	\$ 303.25	\$ 3,639.00	5.66%	\$ 229.11	\$ 2,749.32	4.28%
8000 Gal							
50% FPL	\$ 16,075	\$ 391.85	\$ 4,702.20	29.25%	\$ 200.19	\$ 2,402.28	14.94%
100% FPL	\$ 32,150	\$ 391.85	\$ 4,702.20	14.63%	\$ 314.49	\$ 3,773.88	11.74%
150% FPL	\$ 48,225	\$ 391.85	\$ 4,702.20	9.75%	\$ 314.49	\$ 3,773.88	7.83%
200% FPL	\$ 64,300	\$ 391.85	\$ 4,702.20	7.31%	\$ 314.49	\$ 3,773.88	5.87%

*Proposed Rates Include Tier 2 Stormwater Fee, PENNVest Charge, DSIC, and full tariff 2025 Alcosan charges

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2025 federal poverty guidelines.

See HHS Poverty Guidelines for 2025, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Pittsburgh UNITED Our Water Table Exhibit 1-c
Water/Wastewater/Stormwater Burden Tables
Proposed Full Tariff 2027 vs. Proposed BDP 2027

Corrected

2 Person Household							
	Annual Income	PWSA Monthly (\$) 2027	PWSA Annual (\$) 2027	Burden (%) PWSA 2027	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027
1000 Gal.							
50% FPL	\$ 10,575	\$ 90.06	\$ 1,080.72	10.22%	\$ 23.41	\$ 280.92	2.66%
100% FPL	\$ 21,150	\$ 90.06	\$ 1,080.72	5.11%	\$ 18.81	\$ 225.72	1.07%
150% FPL	\$ 31,725	\$ 90.06	\$ 1,080.72	3.41%	\$ 18.81	\$ 225.72	0.71%
200% FPL	\$ 42,300	\$ 90.06	\$ 1,080.72	2.55%	\$ 18.81	\$ 225.72	0.53%
3000 Gal.							
50% FPL	\$ 10,575	\$ 179.22	\$ 2,150.64	20.34%	\$ 74.10	\$ 889.20	8.41%
100% FPL	\$ 21,150	\$ 179.22	\$ 2,150.64	10.17%	\$ 104.74	\$ 1,256.88	5.94%
150% FPL	\$ 31,725	\$ 179.22	\$ 2,150.64	6.78%	\$ 104.74	\$ 1,256.88	3.96%
200% FPL	\$ 42,300	\$ 179.22	\$ 2,150.64	5.08%	\$ 104.74	\$ 1,256.88	2.97%
6000 Gal.							
50% FPL	\$ 10,575	\$ 312.95	\$ 3,755.40	35.51%	\$ 150.14	\$ 1,801.68	17.04%
100% FPL	\$ 21,150	\$ 312.95	\$ 3,755.40	17.76%	\$ 233.64	\$ 2,803.68	13.26%
150% FPL	\$ 31,725	\$ 312.95	\$ 3,755.40	11.84%	\$ 233.64	\$ 2,803.68	8.84%
200% FPL	\$ 42,300	\$ 312.95	\$ 3,755.40	8.88%	\$ 233.64	\$ 2,803.68	6.63%
8000 Gal.							
50% FPL	\$ 10,575	\$ 402.11	\$ 4,825.32	45.63%	\$ 200.83	\$ 2,409.96	22.79%
100% FPL	\$ 21,150	\$ 402.11	\$ 4,825.32	22.81%	\$ 319.57	\$ 3,834.84	18.13%
150% FPL	\$ 31,725	\$ 402.11	\$ 4,825.32	15.21%	\$ 319.57	\$ 3,834.84	12.09%
200% FPL	\$ 42,300	\$ 402.11	\$ 4,825.32	11.41%	\$ 319.57	\$ 3,834.84	9.07%

3 Person Household							
	Annual Income	PWSA Monthly (\$) 2027	PWSA Annual (\$) 2027	Burden (%) PWSA 2027	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027
1000 Gal.							
50% FPL	\$ 13,325	\$ 90.06	\$ 1,080.72	8.11%	\$ 23.41	\$ 280.92	2.11%
100% FPL	\$ 26,650	\$ 90.06	\$ 1,080.72	4.06%	\$ 18.81	\$ 225.72	0.85%
150% FPL	\$ 39,975	\$ 90.06	\$ 1,080.72	2.70%	\$ 18.81	\$ 225.72	0.56%
200% FPL	\$ 53,300	\$ 90.06	\$ 1,080.72	2.03%	\$ 18.81	\$ 225.72	0.42%
3000 Gal.							
50% FPL	\$ 13,325	\$ 179.22	\$ 2,150.64	16.1%	\$ 74.10	\$ 889.20	6.67%
100% FPL	\$ 26,650	\$ 179.22	\$ 2,150.64	8.1%	\$ 104.74	\$ 1,256.88	4.72%
150% FPL	\$ 39,975	\$ 179.22	\$ 2,150.64	5.4%	\$ 104.74	\$ 1,256.88	3.14%
200% FPL	\$ 53,300	\$ 179.22	\$ 2,150.64	4.0%	\$ 104.74	\$ 1,256.88	2.36%
6000 Gal.							
50% FPL	\$ 13,325	\$ 312.95	\$ 3,755.40	28.18%	\$ 150.14	\$ 1,801.68	13.52%
100% FPL	\$ 26,650	\$ 312.95	\$ 3,755.40	14.09%	\$ 233.64	\$ 2,803.68	10.52%
150% FPL	\$ 39,975	\$ 312.95	\$ 3,755.40	9.39%	\$ 233.64	\$ 2,803.68	7.01%
200% FPL	\$ 53,300	\$ 312.95	\$ 3,755.40	7.05%	\$ 233.64	\$ 2,803.68	5.26%
8000 Gal.							
50% FPL	\$ 13,325	\$ 402.11	\$ 4,825.32	36.21%	\$ 200.83	\$ 2,409.96	18.09%
100% FPL	\$ 26,650	\$ 402.11	\$ 4,825.32	18.11%	\$ 319.57	\$ 3,834.84	14.39%
150% FPL	\$ 39,975	\$ 402.11	\$ 4,825.32	12.07%	\$ 319.57	\$ 3,834.84	9.59%
200% FPL	\$ 53,300	\$ 402.11	\$ 4,825.32	9.05%	\$ 319.57	\$ 3,834.84	7.19%

4 Person Household							
	Annual Income	PWSA Monthly (\$) 2027	PWSA Annual (\$) 2027	Burden (%) PWSA 2027	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027
1000 Gal.							
50% FPL	\$ 16,075	\$ 90.06	\$ 1,080.72	6.72%	\$ 23.41	\$ 280.92	1.75%
100% FPL	\$ 32,150	\$ 90.06	\$ 1,080.72	3.36%	\$ 18.81	\$ 225.72	0.70%
150% FPL	\$ 48,225	\$ 90.06	\$ 1,080.72	2.24%	\$ 18.81	\$ 225.72	0.47%
200% FPL	\$ 64,300	\$ 90.06	\$ 1,080.72	1.68%	\$ 18.81	\$ 225.72	0.35%
3000 Gal							
50% FPL	\$ 16,075	\$ 179.22	\$ 2,150.64	13.38%	\$ 74.10	\$ 889.20	5.53%
100% FPL	\$ 32,150	\$ 179.22	\$ 2,150.64	6.69%	\$ 104.74	\$ 1,256.88	3.91%
150% FPL	\$ 48,225	\$ 179.22	\$ 2,150.64	4.46%	\$ 104.74	\$ 1,256.88	2.61%
200% FPL	\$ 64,300	\$ 179.22	\$ 2,150.64	3.34%	\$ 104.74	\$ 1,256.88	1.95%
6000 Gal							
50% FPL	\$ 16,075	\$ 312.95	\$ 3,755.40	23.36%	\$ 150.14	\$ 1,801.68	11.21%
100% FPL	\$ 32,150	\$ 312.95	\$ 3,755.40	11.68%	\$ 233.64	\$ 2,803.68	8.72%
150% FPL	\$ 48,225	\$ 312.95	\$ 3,755.40	7.79%	\$ 233.64	\$ 2,803.68	5.81%
200% FPL	\$ 64,300	\$ 312.95	\$ 3,755.40	5.84%	\$ 233.64	\$ 2,803.68	4.36%
8000 Gal							
50% FPL	\$ 16,075	\$ 402.11	\$ 4,825.32	30.02%	\$ 200.83	\$ 2,409.96	14.99%
100% FPL	\$ 32,150	\$ 402.11	\$ 4,825.32	15.01%	\$ 319.57	\$ 3,834.84	11.93%
150% FPL	\$ 48,225	\$ 402.11	\$ 4,825.32	10.01%	\$ 319.57	\$ 3,834.84	7.95%
200% FPL	\$ 64,300	\$ 402.11	\$ 4,825.32	7.50%	\$ 319.57	\$ 3,834.84	5.96%

*Proposed Rates Include Tier 2 Stormwater Fee, PENNVest Charge, DSIC, and full tariff 2025 Alcosan charges

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2025 federal poverty guidelines.

See HHS Poverty Guidelines for 2025, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Pittsburgh UNITED Our Water Table Exhibit 1-d
Water/Wastewater/Stormwater Burden Tables
Proposed PWSA BDP 2027 vs. OWT BDP

Corrected

2 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 10,575	\$ 23.41	\$ 280.92	2.66%	\$ 11.23	\$ 134.76	1.27%
100% FPL	\$ 21,150	\$ 18.81	\$ 225.72	1.07%	\$ 23.41	\$ 280.92	1.33%
150% FPL	\$ 31,725	\$ 18.81	\$ 225.72	0.71%	\$ 18.81	\$ 225.72	0.71%
200% FPL	\$ 42,300	\$ 18.81	\$ 225.72	0.53%	\$ 18.81	\$ 225.72	0.53%
3000 Gal.							
50% FPL	\$ 10,575	\$ 74.10	\$ 889.20	8.41%	\$ 61.92	\$ 743.04	7.03%
100% FPL	\$ 21,150	\$ 104.74	\$ 1,256.88	5.94%	\$ 74.10	\$ 889.20	4.20%
150% FPL	\$ 31,725	\$ 104.74	\$ 1,256.88	3.96%	\$ 104.74	\$ 1,256.88	3.96%
200% FPL	\$ 42,300	\$ 104.74	\$ 1,256.88	2.97%	\$ 104.74	\$ 1,256.88	2.97%
6000 Gal.							
50% FPL	\$ 10,575	\$ 150.14	\$ 1,801.68	17.04%	\$ 137.96	\$ 1,655.52	15.66%
100% FPL	\$ 21,150	\$ 233.64	\$ 2,803.68	13.26%	\$ 150.14	\$ 1,801.68	8.52%
150% FPL	\$ 31,725	\$ 233.64	\$ 2,803.68	8.84%	\$ 233.64	\$ 2,803.68	8.84%
200% FPL	\$ 42,300	\$ 233.64	\$ 2,803.68	6.63%	\$ 233.64	\$ 2,803.68	6.63%
8000 Gal.							
50% FPL	\$ 10,575	\$ 200.83	\$ 2,409.96	22.79%	\$ 188.65	\$ 2,263.80	21.41%
100% FPL	\$ 21,150	\$ 319.57	\$ 3,834.84	18.13%	\$ 200.83	\$ 2,409.96	11.39%
150% FPL	\$ 31,725	\$ 319.57	\$ 3,834.84	12.09%	\$ 319.57	\$ 3,834.84	12.09%
200% FPL	\$ 42,300	\$ 319.57	\$ 3,834.84	9.07%	\$ 319.57	\$ 3,834.84	9.07%

3 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 13,325	\$ 23.41	\$ 280.92	2.11%	\$ 11.23	\$ 134.76	1.01%
100% FPL	\$ 26,650	\$ 18.81	\$ 225.72	0.85%	\$ 23.41	\$ 280.92	1.05%
150% FPL	\$ 39,975	\$ 18.81	\$ 225.72	0.56%	\$ 18.81	\$ 225.72	0.56%
200% FPL	\$ 53,300	\$ 18.81	\$ 225.72	0.42%	\$ 18.81	\$ 225.72	0.42%
3000 Gal.							
50% FPL	\$ 13,325	\$ 74.10	\$ 889.20	6.67%	\$ 61.92	\$ 743.04	5.58%
100% FPL	\$ 26,650	\$ 104.74	\$ 1,256.88	4.72%	\$ 74.10	\$ 889.20	3.34%
150% FPL	\$ 39,975	\$ 104.74	\$ 1,256.88	3.14%	\$ 104.74	\$ 1,256.88	3.14%
200% FPL	\$ 53,300	\$ 104.74	\$ 1,256.88	2.36%	\$ 104.74	\$ 1,256.88	2.36%
6000 Gal.							
50% FPL	\$ 13,325	\$ 150.14	\$ 1,801.68	13.52%	\$ 137.96	\$ 1,655.52	12.42%
100% FPL	\$ 26,650	\$ 233.64	\$ 2,803.68	10.52%	\$ 150.14	\$ 1,801.68	6.76%
150% FPL	\$ 39,975	\$ 233.64	\$ 2,803.68	7.01%	\$ 233.64	\$ 2,803.68	7.01%
200% FPL	\$ 53,300	\$ 233.64	\$ 2,803.68	5.26%	\$ 233.64	\$ 2,803.68	5.26%
8000 Gal.							
50% FPL	\$ 13,325	\$ 200.83	\$ 2,409.96	18.09%	\$ 188.65	\$ 2,263.80	16.99%
100% FPL	\$ 26,650	\$ 319.57	\$ 3,834.84	14.39%	\$ 200.83	\$ 2,409.96	9.04%
150% FPL	\$ 39,975	\$ 319.57	\$ 3,834.84	9.59%	\$ 319.57	\$ 3,834.84	9.59%
200% FPL	\$ 53,300	\$ 319.57	\$ 3,834.84	7.19%	\$ 319.57	\$ 3,834.84	7.19%

4 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 16,075	\$ 23.41	\$ 280.92	1.75%	\$ 11.23	\$ 134.76	0.84%
100% FPL	\$ 32,150	\$ 18.81	\$ 225.72	0.70%	\$ 23.41	\$ 280.92	0.87%
150% FPL	\$ 48,225	\$ 18.81	\$ 225.72	0.47%	\$ 18.81	\$ 225.72	0.47%
200% FPL	\$ 64,300	\$ 18.81	\$ 225.72	0.35%	\$ 18.81	\$ 225.72	0.35%
3000 Gal							
50% FPL	\$ 16,075	\$ 74.10	\$ 889.20	5.53%	\$ 61.92	\$ 743.04	4.62%
100% FPL	\$ 32,150	\$ 104.74	\$ 1,256.88	3.91%	\$ 71.10	\$ 853.20	2.65%
150% FPL	\$ 48,225	\$ 104.74	\$ 1,256.88	2.61%	\$ 104.74	\$ 1,256.88	2.61%
200% FPL	\$ 64,300	\$ 104.74	\$ 1,256.88	1.95%	\$ 104.74	\$ 1,256.88	1.95%
6000 Gal							
50% FPL	\$ 16,075	\$ 150.14	\$ 1,801.68	11.21%	\$ 137.96	\$ 1,655.52	10.30%
100% FPL	\$ 32,150	\$ 233.64	\$ 2,803.68	8.72%	\$ 150.14	\$ 1,801.68	5.60%
150% FPL	\$ 48,225	\$ 233.64	\$ 2,803.68	5.81%	\$ 233.64	\$ 2,803.68	5.81%
200% FPL	\$ 64,300	\$ 233.64	\$ 2,803.68	4.36%	\$ 233.64	\$ 2,803.68	4.36%
8000 Gal							
50% FPL	\$ 16,075	\$ 200.83	\$ 2,409.96	14.99%	\$ 188.65	\$ 2,263.80	14.08%
100% FPL	\$ 32,150	\$ 319.57	\$ 3,834.84	11.93%	\$ 200.83	\$ 2,409.96	7.50%
150% FPL	\$ 48,225	\$ 319.57	\$ 3,834.84	7.95%	\$ 319.57	\$ 3,834.84	7.95%
200% FPL	\$ 64,300	\$ 319.57	\$ 3,834.84	5.96%	\$ 319.57	\$ 3,834.84	5.96%

*Proposed Rates Include Tier 2 Stormwater Fee, PENNVest Charge, DSIC, and full tariff Alcosan charges

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2025 federal poverty guidelines.

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Pittsburgh UNITED Our Water Table Exhibit 1-e
Water/Wastewater/Stormwater Burden Tables
Proposed PWSA BDP 2027 vs. OWT BDP (with Alcosan Discount)

Corrected

2 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 10,575	\$ 6.74	\$ 80.88	0.76%	\$ (5.44)	\$ (65.28)	-0.62%
100% FPL	\$ 21,150	\$ 2.14	\$ 25.68	0.12%	\$ 6.74	\$ 80.88	0.38%
150% FPL	\$ 31,725	\$ 2.14	\$ 25.68	0.08%	\$ 2.14	\$ 25.68	0.08%
200% FPL	\$ 42,300	\$ 2.14	\$ 25.68	0.06%	\$ 2.14	\$ 25.68	0.06%
3000 Gal.							
50% FPL	\$ 10,575	\$ 57.43	\$ 689.16	6.52%	\$ 45.25	\$ 543.00	5.13%
100% FPL	\$ 21,150	\$ 88.07	\$ 1,056.84	5.00%	\$ 57.23	\$ 686.76	3.25%
150% FPL	\$ 31,725	\$ 88.07	\$ 1,056.84	3.33%	\$ 88.07	\$ 1,056.84	3.33%
200% FPL	\$ 42,300	\$ 88.07	\$ 1,056.84	2.50%	\$ 88.07	\$ 1,056.84	2.50%
6000 Gal.							
50% FPL	\$ 10,575	\$ 133.47	\$ 1,601.64	15.15%	\$ 121.29	\$ 1,455.48	13.76%
100% FPL	\$ 21,150	\$ 216.97	\$ 2,603.64	12.31%	\$ 133.47	\$ 1,601.64	7.57%
150% FPL	\$ 31,725	\$ 216.97	\$ 2,603.64	8.21%	\$ 216.97	\$ 2,603.64	8.21%
200% FPL	\$ 42,300	\$ 216.97	\$ 2,603.64	6.16%	\$ 216.97	\$ 2,603.64	6.16%
8000 Gal.							
50% FPL	\$ 10,575	\$ 184.16	\$ 2,209.92	20.90%	\$ 171.98	\$ 2,063.76	19.52%
100% FPL	\$ 21,150	\$ 302.90	\$ 3,634.80	17.19%	\$ 184.16	\$ 2,209.92	10.45%
150% FPL	\$ 31,725	\$ 302.90	\$ 3,634.80	11.46%	\$ 302.90	\$ 3,634.80	11.46%
200% FPL	\$ 42,300	\$ 302.90	\$ 3,634.80	8.59%	\$ 302.90	\$ 3,634.80	8.59%

3 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 13,325	\$ 6.74	\$ 80.88	0.61%	\$ (5.44)	\$ (65.28)	-0.49%
100% FPL	\$ 26,650	\$ 2.14	\$ 25.68	0.10%	\$ 6.74	\$ 80.88	0.30%
150% FPL	\$ 39,975	\$ 2.14	\$ 25.68	0.06%	\$ 2.14	\$ 25.68	0.06%
200% FPL	\$ 53,300	\$ 2.14	\$ 25.68	0.05%	\$ 2.14	\$ 25.68	0.05%
3000 Gal							
50% FPL	\$ 13,325	\$ 57.43	\$ 689.16	5.17%	\$ 45.25	\$ 543.00	4.08%
100% FPL	\$ 26,650	\$ 88.07	\$ 1,056.84	3.97%	\$ 57.23	\$ 686.76	2.58%
150% FPL	\$ 39,975	\$ 88.07	\$ 1,056.84	2.64%	\$ 88.07	\$ 1,056.84	2.64%
200% FPL	\$ 53,300	\$ 88.07	\$ 1,056.84	1.98%	\$ 88.07	\$ 1,056.84	1.98%
6000 Gal							
50% FPL	\$ 13,325	\$ 133.47	\$ 1,601.64	12.02%	\$ 121.29	\$ 1,455.48	10.92%
100% FPL	\$ 26,650	\$ 216.97	\$ 2,603.64	9.77%	\$ 133.47	\$ 1,601.64	6.01%
150% FPL	\$ 39,975	\$ 216.97	\$ 2,603.64	6.51%	\$ 216.97	\$ 2,603.64	6.51%
200% FPL	\$ 53,300	\$ 216.97	\$ 2,603.64	4.88%	\$ 216.97	\$ 2,603.64	4.88%
8000 Gal							
50% FPL	\$ 13,325	\$ 184.16	\$ 2,209.92	16.58%	\$ 171.98	\$ 2,063.76	15.49%
100% FPL	\$ 26,650	\$ 302.90	\$ 3,634.80	13.64%	\$ 184.16	\$ 2,209.92	8.29%
150% FPL	\$ 39,975	\$ 302.90	\$ 3,634.80	9.09%	\$ 302.90	\$ 3,634.80	9.09%
200% FPL	\$ 53,300	\$ 302.90	\$ 3,634.80	6.82%	\$ 302.90	\$ 3,634.80	6.82%

4 Person Household							
	Annual Income	PWSA Monthly (\$) BDP 2027	PWSA Annual (\$) BDP 2027	Burden (%) PWSA BDP 2027	OWT Monthly (\$) BDP	OWT Annual (\$) BDP	Burden (%) OWT BDP
1000 Gal.							
50% FPL	\$ 16,075	\$ 6.74	\$ 80.88	0.50%	\$ (5.44)	\$ (65.28)	-0.41%
100% FPL	\$ 32,150	\$ 2.14	\$ 25.68	0.08%	\$ 6.74	\$ 80.88	0.25%
150% FPL	\$ 48,225	\$ 2.14	\$ 25.68	0.05%	\$ 2.14	\$ 25.68	0.05%
200% FPL	\$ 64,300	\$ 2.14	\$ 25.68	0.04%	\$ 2.14	\$ 25.68	0.04%
3000 Gal							
50% FPL	\$ 16,075	\$ 57.43	\$ 689.16	4.29%	\$ 45.25	\$ 543.00	3.38%
100% FPL	\$ 32,150	\$ 88.07	\$ 1,056.84	3.29%	\$ 57.23	\$ 686.76	2.14%
150% FPL	\$ 48,225	\$ 88.07	\$ 1,056.84	2.19%	\$ 88.07	\$ 1,056.84	2.19%
200% FPL	\$ 64,300	\$ 88.07	\$ 1,056.84	1.64%	\$ 88.07	\$ 1,056.84	1.64%
6000 Gal							
50% FPL	\$ 16,075	\$ 133.47	\$ 1,601.64	9.96%	\$ 121.29	\$ 1,455.48	9.05%
100% FPL	\$ 32,150	\$ 216.97	\$ 2,603.64	8.10%	\$ 133.47	\$ 1,601.64	4.98%
150% FPL	\$ 48,225	\$ 216.97	\$ 2,603.64	5.40%	\$ 216.97	\$ 2,603.64	5.40%
200% FPL	\$ 64,300	\$ 216.97	\$ 2,603.64	4.05%	\$ 216.97	\$ 2,603.64	4.05%
8000 Gal							
50% FPL	\$ 16,075	\$ 184.16	\$ 2,209.92	13.75%	\$ 171.98	\$ 2,063.76	12.84%
100% FPL	\$ 32,150	\$ 302.90	\$ 3,634.80	11.31%	\$ 184.16	\$ 2,209.92	6.87%
150% FPL	\$ 48,225	\$ 302.90	\$ 3,634.80	7.54%	\$ 302.90	\$ 3,634.80	7.54%
200% FPL	\$ 64,300	\$ 302.90	\$ 3,634.80	5.65%	\$ 302.90	\$ 3,634.80	5.65%

*Proposed Rates Include Tier 2 Stormwater Fee, PENNVest Charge, DSIC, and Alcosan charges with Clean Water Assistance Fund Discr

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2025 federal poverty guidelines.

See HHS Poverty Guidelines for 2025, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

VERIFICATION OF PATRICK M. CICERO

I, Patrick M. Cicero, verify that the following testimony, exhibits, and appendices were prepared by me or under my direct supervision, and are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter:

- Direct Testimony of Patrick M. Cicero on behalf of Pittsburgh United Our Water Table (OWT Statement 1)
 - 100 pages of written testimony
 - OWT St. 1, Cicero, Exhibit 1, Burden Tables
 - OWT St. 1, Cicero, Appendix A, Resume – Patrick M. Cicero
 - OWT St. 1, Cicero, Appendix B, Selected Interrogatory Responses cited and relied on throughout testimony
- Rebuttal Testimony of Patrick M. Cicero on behalf of Pittsburgh United Our Water Table (OWT Statement 1-R)
 - 8 pages of written testimony
- Surrebuttal Testimony of Patrick M. Cicero on behalf of Pittsburgh United Our Water Table (OWT Statement 1-SR)
 - 35 pages of written testimony
 - Pittsburgh United OWT Statement 1, Cicero, Exhibit 1, corrected – Burden Tables

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in blue ink, appearing to read "Patrick", is positioned above a solid black horizontal line.

Dated: October 17, 2025

Patrick M. Cicero
Witness, Pittsburgh United Our Water Table