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October 28, 2025

Via Email

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

Re: Harry Bolton v. The Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water,
Docket No. C-2025-3056203

Dear Judge DeVoe:

Per the Prehearing Order dated October 17, 2025, enclosed please find the proposed hearing exhibits that The Pittsburgh Water and Sewer Authority ("Pittsburgh Water") may present into evidence during the telephonic hearing scheduled for Tuesday, November 4, 2025 at 1:00pm in the above-referenced proceeding. Pursuant to the Prehearing Order, the proposed exhibits are being provided in both Redacted and Unredacted (Confidential) formats.

Pittsburgh Water's Proposed Hearing Exhibits:	
1	Pittsburgh Water's Answer to Formal Complaint dated September 8, 2025
2	Account History for 318 Johnston Avenue

Copies to be served in accordance with the attached Certificate of Service. Please contact me with any questions or concerns.

Sincerely,

Lauren M. Burge

Lauren M. Burge

Enclosures

cc: Cert. of Service w/enc.
Matthew L. Homsher, Secretary (Cert. of Service only)

CERTIFICATE OF SERVICE

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

Via First Class Mail

Harry Bolton
318 Johnston Avenue
Pittsburgh, PA 15207

Date: October 28, 2025

/s/ Lauren M. Burge

Lauren M. Burge, Esquire

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

Pittsburgh Water Exhibit 1

*Pittsburgh Water's
Answer to Formal Complaint
dated September 8, 2025*

CFarley@pgh2o.com
Direct Dial: 412.393.0210

September 8, 2025

VIA ELECTRONIC FILING
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: Harry Bolton v. The Pittsburgh Water and Sewer Authority
Docket No. C-2025-3056203

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Pittsburgh Water and Sewer Authority's Answer to Formal Complaint regarding the above referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Respectfully Submitted,
/s/ Conor D. Farley
Conor D. Farley
Pa. Attorney Id. # 328617

Enclosure

cc: Certificate of Service (with Enclosures)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing PITTSBURGH WATER AND SEWER AUTHORITY'S ANSWER TO FORMAL COMPLAINT has been served in accordance with the requirements of 52 Pa. Code § 1.54 on this 8th day of September 2025, upon the following:

Via E-Filing / Email / U.S. Mail

Harry Bolton
318 Johnston Ave.
Pittsburgh, PA 15207
Via U.S. Mail only

Hon. Charles E. Rainey, Jr.
Chief Administrative Judge
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120
Email: dscheleig@pa.gov

Hon. Emily DeVoe
PA Public Utility Commission
301 Fifth Avenue, Suite 220
Pittsburgh, PA 15222
Email: edevoe@pa.gov

Respectfully submitted,

/s/Conor D. Farley

Conor D. Farley (Pa. I.D. No. 328617)
Pittsburgh Water and Sewer Authority
Attorney for Respondent
Pittsburgh Water and Sewer Authority

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Harry Bolton,	:	
	:	
Complainant,	:	
	:	
v.	:	Docket No. C-2025-3056203
	:	
	:	
The Pittsburgh Water and Sewer Authority,	:	
	:	
Respondent.	:	
	:	

**THE PITTSBURGH WATER AND SEWER AUTHORITY’S
ANSWER TO FORMAL COMPLAINT**

Pursuant to the regulations of the Pennsylvania Public Utility Commission (“Commission” or “PUC”) at 52 Pa. Code § 5.61, The Pittsburgh Water and Sewer Authority (“Pittsburgh Water”) submits this Answer to the Formal Complaint of Harry Bolton (“Mr. Bolton”, or “Complainant”) served on July 9, 2025. In support of this Answer, Pittsburgh Water avers as follows:

INTRODUCTION

Complainant objects to Pittsburgh Water’s proposed rate increase filed with the Pennsylvania Public Utility Commission (“Commission” or “PUC”) on June 4, 2025, which seeks approval to adjust water, wastewater conveyance, and stormwater rates. The Complaint does not allege any specific issues with the Complainant’s billing, service, or meter accuracy, but instead generally opposes the increase as unreasonable or unaffordable. He further indicates that he is in need of a payment plan.

Pittsburgh Water requests that this case be dismissed for two independent reasons. First, to the extent the Complainant disputes the proposed rate increase, that issue should be addressed as part of the consolidated proceedings currently pending before the Commission at Docket Nos. R-2025-3055010 (water), R-2025-3055011 (wastewater), and R-2025-3055012 (stormwater). Second, although Mr. Bolton also indicates in his formal complaint that he is seeking a payment

arrangement, Pittsburgh Water's records confirm that Mr. Bolton's account is current and carries no past due balance. As such, there is no valid basis for requesting or granting a payment plan at this time, and Pittsburgh Water respectfully requests the Commission dismiss this case.

ANSWER

1. To the best of Pittsburgh Water's knowledge and belief, the name and contact information for the Complainant is as provided in the formal Complaint. *Per* the Allegheny County Real Estate Assessment website, the owners of the subject single-family residential property located at 318 Johnston Avenue, Pittsburgh, PA are Harry and Kathleen Bolton.¹

2. It is admitted that the Formal Complaint is directed at Pittsburgh Water. By way of further answer, Pittsburgh Water is a municipal authority created in 1984 and is responsible for producing and supplying water along with maintaining and operating the water and sewer infrastructure in Pittsburgh. Effective April 1, 2018, Pittsburgh Water became subject to the jurisdiction of the Commission as a regulated public utility. 66 Pa. C.S. §§ 3201-3209. Pittsburgh Water's currently approved water, wastewater and stormwater tariffs became effective on February 15, 2024 (see February 13, 2024 Secretarial Letters entered at Docket Numbers: R-2023-3039920 [water], R-2023-3039921 [wastewater] and R-2023-3039919 [stormwater]).²

3. It is admitted that Pittsburgh Water provides water service to the Complainant. By way of further response, Pittsburgh Water also provides wastewater conveyance service and stormwater service to the Property. Additionally, the Complainant's bill includes sewage treatment charges from the Allegheny County Sanitary Authority ("ALCOSAN"), which are

¹ See Allegheny County tax records for 3198 Liberty Ave., Pittsburgh (Parcel ID: 0026-B-00056-0000-00), which are available at: <http://www2.alleghenycounty.us/RealEstate/search.aspx>.

² Pittsburgh Water's previously approved water, wastewater and stormwater tariffs became effective on January 12, 2022 (see January 11, 2022 Secretarial Letters entered at Docket Numbers: R-2021-3024773 [water], R-2021-3024774 [wastewater] and R-2021-3024779 [stormwater]). Further, by Secretarial Letter dated January 11, 2023, the Commission approved Pittsburgh Water's Compliance Tariffs at Docket Nos. M-2018-2640802 and M-2018-2640803, effective January 14, 2023.

established by ALCOSAN and paid by Pittsburgh Water to ALCOSAN pursuant to Pittsburgh Water's tariff.

4. The allegations in Paragraph 4 of the Formal Complaint are admitted and denied consistent with the following:³

Response to Complainant's Objection to Proposed Rate Increase

- (a) It is admitted that Pittsburgh Water filed Supplement No. 16 to Tariff Water – PA P.U.C. No. 1, Supplement No. 15 to Tariff Wastewater – PA P.U.C. No. 1, and Supplement No. 7 to Tariff Stormwater – PA P.U.C. No. 1, on June 4, 2025, seeking a total revenue increase of approximately \$84.4 million over a two-year period.
- (b) The proposed rates are designed to ensure ongoing investments in infrastructure, address rising operational and environmental costs, and promote rate equity among customer classes. By way of further response, the proposed rate filing includes a Statement of Reasons, cost of service study, and supporting testimony to justify the requested increase. The filing reflects costs necessary to maintain and improve essential public water, wastewater, and/or stormwater services for the city of Pittsburgh and borough of Millvale.
- (c) By way of further response, Pittsburgh Water would like to acknowledge that the Complainant may choose to participate in the Commission's ongoing investigation of the proposed rate filing at Docket Nos. R-2025-3055010, R-2025-3055011, and R-2025-3055012, in accordance with the Commission's regulations.

Response to Complainant's Request for a Payment Plan

- (d) It is denied that the Complainant needs a payment plan on his account. Pittsburgh Water records show that the account is current with no outstanding balance. Moreover, the Complainant has a consistent history of timely payments and has not demonstrated any prior difficulty in managing his billing obligations. Therefore, there is no factual or legal basis to support the need for a payment plan at this time.

Additional Responses by Pittsburgh Water

- (a) No response is required to the legal conclusions in the Formal Complaint.
- (b) After reasonable investigation, Pittsburgh Water does not have sufficient information to form a belief as to the truth of the remaining factual allegations in the Formal Complaint.

³ This Complaint was submitted on the Commission's Formal Complaint form. The allegations within each numbered paragraph of that the Formal Complaint are not styled in numbered paragraphs. Pittsburgh Water is answering the allegations within the numbered paragraphs under separate headings for ease of reference.

Such allegations are, therefore, denied. Strict proof of said allegations is demanded at the time of hearing in this matter.

- (c) The Formal Complaint fails to allege a violation by Pittsburgh Water of Pittsburgh Water's tariff.
- (d) The Formal Complaint fails to allege a violation by Pittsburgh Water of the Public Utility Code, another statute administered by the Commission, the Commission's Regulations and/or the Commission's Orders.

5. The Formal Complaint fails to allege that Pittsburgh Water has violated Pennsylvania law or Commission regulations. By way of further answer, Pittsburgh Water incorporates herein its response to Paragraph 4, above.

6-10. No response is required to Paragraphs 6 through 10 of the Formal Complaint. To the extent such allegations are deemed factual, the factual allegations in Paragraphs 6 through 10 of the Formal Complaint are admitted or denied consistent with Paragraphs 1 through 5 of this Answer.

CONCLUSION

WHEREFORE, The Pittsburgh Water and Sewer Authority respectfully requests that the Commission (a) dismiss the Complaint; and, (b) grant any other relief deemed appropriate. Notwithstanding Pittsburgh Water's requests for dismissal of the Complaint, Pittsburgh Water is willing to work with the Complainant to resolve this matter and therefore requests that the Office of Administrative Law Judge issue an "Interim Order Setting Resolution Conference" directing the parties to hold a conference about resolving the case.

Respectfully submitted,

/s/ *Conor D. Farley*

Conor D. Farley, Esquire (I.D. No. 328617)
Corporate Counsel for the
Pittsburgh Water and Sewer Authority
1200 Penn Ave.
Pittsburgh, PA 15222
Phone: (412) 393-0210
Email: cfarley@pgh2o.com

Date: September 8, 2025

Verification

I, Julie A. Mechling, am the Director of Customer Service for The Pittsburgh Water and Sewer Authority (“Pittsburgh Water”), and I hereby state that the facts set forth in the foregoing **Answer** are true and correct to the best of my knowledge, information and belief and that I expect the Authority to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: September 8, 2025

/s/ Julie A. Mechling
Julie A. Mechling
Director of Customer Service
The Pittsburgh Water and Sewer Authority

Pittsburgh Water Exhibit 2

Account History for 318 Johnston Ave.

HARRY BOLTON / [REDACTED]					
318 JOHNSTON AVE / PITTSBURGH PA 15207-1743					
Account History: [REDACTED], Open Amount \$0.00 USD, Amount Due \$0.00 USD					
Posting Date	Due Date	Description	Amount	Still Open	Running Balance
10/2/2025	10/2/2025	Payment Lot	-\$9.87	\$0.00	\$0.00
9/24/2025	10/17/2025	IS-U Invoicing	\$9.87	\$0.00	\$9.87
8/29/2025	8/29/2025	Payment Lot	-\$9.87	\$0.00	\$0.00
8/21/2025	9/15/2025	IS-U Invoicing	\$9.87	\$0.00	\$9.87
8/4/2025	8/4/2025	Payment Lot	-\$21.79	\$0.00	\$0.00
7/23/2025	8/15/2025	IS-U Invoicing	\$21.79	\$0.00	\$21.79
7/7/2025	7/7/2025	Payment Lot	-\$9.87	\$0.00	\$0.00
6/25/2025	7/18/2025	IS-U Invoicing	\$9.87	\$0.00	\$9.87
6/4/2025	6/4/2025	Payment Lot	-\$9.87	\$0.00	\$0.00
5/23/2025	6/16/2025	IS-U Invoicing	\$9.87	\$0.00	\$9.87
5/7/2025	5/7/2025	Payment Lot	-\$10.14	\$0.00	\$0.00
4/24/2025	5/19/2025	IS-U Invoicing	\$21.79	\$0.00	\$10.14
4/7/2025	4/7/2025	Payment Lot	-\$21.52	\$0.00	-\$11.65
3/27/2025	4/21/2025	IS-U Invoicing	\$9.87	\$0.00	\$9.87
3/10/2025	3/10/2025	Payment Lot	-\$21.52	\$0.00	\$0.00
2/25/2025	3/20/2025	IS-U Invoicing	\$21.79	\$0.00	\$21.52
2/18/2025	2/18/2025	Payment Lot	-\$9.96	\$0.00	-\$0.27
1/24/2025	2/18/2025	IS-U Invoicing	\$9.69	\$0.00	\$9.69
1/8/2025	1/8/2025	Payment Lot	-\$20.46	\$0.00	\$0.00
12/24/2024	1/13/2025	IS-U Invoicing	\$20.46	\$0.00	\$20.46
12/10/2024	12/10/2024	Payment Lot	-\$9.32	\$0.00	\$0.00
11/22/2024	12/12/2024	IS-U Invoicing	\$9.32	\$0.00	\$9.32
11/4/2024	11/4/2024	Payment Lot	-\$9.30	\$0.00	\$0.00
10/24/2024	11/13/2024	IS-U Invoicing	\$9.32	\$0.00	\$9.30
10/3/2024	10/3/2024	Payment Lot	-\$20.48	\$0.00	-\$0.02
9/25/2024	10/15/2024	IS-U Invoicing	\$20.46	\$0.00	\$20.46
9/3/2024	9/3/2024	Payment Lot	-\$9.32	\$0.00	\$0.00
8/23/2024	9/12/2024	IS-U Invoicing	\$9.32	\$0.00	\$9.32
8/1/2024	8/1/2024	Payment Lot	-\$20.46	\$0.00	\$0.00
7/23/2024	8/12/2024	IS-U Invoicing	\$20.46	\$0.00	\$20.46
7/3/2024	7/3/2024	Payment Lot	-\$9.32	\$0.00	\$0.00
6/21/2024	7/11/2024	IS-U Invoicing	\$9.32	\$0.00	\$9.32
5/31/2024	5/31/2024	Payment Lot	-\$20.46	\$0.00	\$0.00
5/21/2024	6/10/2024	IS-U Invoicing	\$20.46	\$0.00	\$20.46
5/1/2024	5/1/2024	Payment Lot	-\$9.32	\$0.00	\$0.00
4/23/2024	5/13/2024	IS-U Invoicing	\$9.32	\$0.00	\$9.32
3/28/2024	3/28/2024	Payment Lot	-\$20.46	\$0.00	\$0.00
3/20/2024	4/9/2024	IS-U Invoicing	\$20.46	\$0.00	\$20.46
3/4/2024	3/4/2024	Payment Lot	-\$53.03	\$0.00	\$0.00

2/21/2024	3/12/2024	IS-U Invoicing	\$53.03	\$0.00	\$53.03
2/1/2024	2/1/2024	Payment Lot	-\$62.23	\$0.00	\$0.00
1/23/2024	2/12/2024	IS-U Invoicing	\$62.23	\$0.00	\$62.23
12/29/2023	12/28/2023	Payment Lot	-\$50.77	\$0.00	\$0.00
12/19/2023	1/8/2024	IS-U Invoicing	\$50.77	\$0.00	\$50.77
12/7/2023	12/7/2023	Payment Lot	-\$50.77	\$0.00	\$0.00
11/21/2023	12/11/2023	IS-U Invoicing	\$50.77	\$0.00	\$50.77
10/30/2023	10/30/2023	Payment Lot	-\$61.18	\$0.00	\$0.00
10/19/2023	11/8/2023	IS-U Invoicing	\$61.18	\$0.00	\$61.18
10/2/2023	10/2/2023	Payment Lot	-\$50.77	\$0.00	\$0.00
9/19/2023	10/9/2023	IS-U Invoicing	\$50.77	\$0.00	\$50.77
9/1/2023	9/1/2023	Payment Lot	-\$50.77	\$0.00	\$0.00
8/18/2023	9/7/2023	IS-U Invoicing	\$50.77	\$0.00	\$50.77
8/3/2023	8/3/2023	Payment Lot	-\$61.18	\$0.00	\$0.00
7/21/2023	8/10/2023	IS-U Invoicing	\$61.18	\$0.00	\$61.18
7/6/2023	7/6/2023	Payment Lot	-\$50.77	\$0.00	\$0.00
6/20/2023	7/10/2023	IS-U Invoicing	\$50.77	\$0.00	\$50.77
5/31/2023	5/31/2023	Payment Lot	-\$11.52	\$0.00	\$0.00
5/19/2023	6/8/2023	IS-U Invoicing	\$50.77	\$0.00	\$11.52
4/21/2023	5/11/2023	IS-U Invoicing	\$50.77	\$0.00	-\$39.25
4/12/2023	4/12/2023	Manual Posting	-\$90.02	\$0.00	-\$90.02
4/4/2023	4/4/2023	Payment Lot	-\$69.13	\$0.00	\$0.00
3/23/2023	4/12/2023	IS-U Invoicing	\$69.13	\$0.00	\$69.13
3/6/2023	3/6/2023	Payment Lot	-\$58.72	\$0.00	\$0.00
2/23/2023	3/15/2023	IS-U Invoicing	\$58.72	\$0.00	\$58.72
2/1/2023	2/1/2023	Payment Lot	-\$67.63	\$0.00	\$0.00
1/25/2023	2/14/2023	IS-U Invoicing	\$67.63	\$0.00	\$67.63
1/5/2023	1/5/2023	Payment Lot	-\$55.57	\$0.00	\$0.00
12/23/2022	1/12/2023	IS-U Invoicing	\$55.57	\$0.00	\$55.57
12/5/2022	12/5/2022	Payment Lot	-\$60.59	\$0.00	\$0.00
11/23/2022	12/13/2022	IS-U Invoicing	\$55.57	\$0.00	\$60.59
11/23/2022	12/13/2022	Interest Document Invoicing	\$0.02	\$0.00	\$5.02
10/31/2022	10/31/2022	Payment Lot	-\$60.30	\$0.00	\$5.00
10/21/2022	11/10/2022	IS-U Invoicing	\$65.30	\$0.00	\$65.30
10/4/2022	10/4/2022	Payment Lot	-\$55.57	\$0.00	\$0.00
9/22/2022	10/12/2022	IS-U Invoicing	\$55.57	\$0.00	\$55.57
9/6/2022	9/6/2022	Payment Lot	-\$55.57	\$0.00	\$0.00
8/23/2022	9/12/2022	IS-U Invoicing	\$55.57	\$0.00	\$55.57
8/8/2022	8/1/2022	Payment Lot	-\$65.30	\$0.00	\$0.00
7/31/2022	1/13/2016	Migration Document	-\$0.26	\$0.00	\$65.30
7/31/2022	7/11/2022	Migration Document	\$0.23	\$0.00	\$65.56
7/31/2022	7/11/2022	Migration Document	\$0.02	\$0.00	\$65.33
7/31/2022	7/11/2022	Migration Document	\$0.01	\$0.00	\$65.31
7/31/2022	8/9/2022	Migration Document	\$11.92	\$0.00	\$65.30

7/31/2022	8/9/2022	Migration Document	\$1.35	\$0.00	\$53.38
7/31/2022	8/9/2022	Migration Document	\$0.40	\$0.00	\$52.03
7/31/2022	8/9/2022	Migration Document	\$16.54	\$0.00	\$51.63
7/31/2022	8/9/2022	Migration Document	\$8.09	\$0.00	\$35.09
7/31/2022	8/9/2022	Migration Document	\$27.00	\$0.00	\$27.00