



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

June 16, 2026

IN REPLY PLEASE
REFER TO OUR FILE

Docket No. P-2024-3046468
Utility Code 2220554

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RE: Petition of The Pittsburgh Water and Sewer Authority for Approval of its Lead Service Line Replacement Program at Docket No. P-2024-3046468

Dear Attorneys Clearfield, O'Dell, Stoner, and Burge:

On February 15, 2024, The Pittsburgh Water and Sewer Authority (PWSA) filed the above-captioned document (Petition) with the Pennsylvania Public Utility Commission (Commission). For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

Please forward the information to the Secretary of the Commission **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

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

Please note your answers must be verified per 52 Pa. Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], hereby state that the facts above set forth 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. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature _____
Title _____
Date _____

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the review, please send a copy of the response to Matthew T. Lamb, P.E. in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at mlamb@pa.gov. Please also direct any questions to Matthew Lamb at telephone number (717) 783-1001. Thank you in advance for your cooperation.

Sincerely,



Matthew L. Homsher
Secretary

Enclosure: TUS Data Request Set 2

cc: Darryl Lawrence, Office of Consumer Advocate (w/enclosure), ra-oca@paoca.org
Harrison Breitman, Office of Consumer Advocate (w/enclosure), hbreitman@paoca.org
NazAarah Sabree, Office of Small Business Advocate (w/enclosure), ra-sba@pa.gov
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TUS Data Request Set 2

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Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

- P-22. Pursuant to the Commission’s Opinion and Order entered July 24, 2025, PWSA filed with the Commission on August 25, 2025, a copy of its revised Long-Term Infrastructure Improvement Plan (LTIIP), revised Lead Service Line Replacement Plan (LSLR Plan), and revised *pro forma* tariff supplement (Pro Forma Tariff). PWSA’s Pro Forma Tariff, Section 1.e. included a definition (Lead Service Line Definition) for “lead service line” of “[a]ny service line made of lead, or galvanized iron or galvanized steel that is or formerly was downstream of lead”. However, the Lead Service Line Definition does not comply with Commission LSLR regulations. Pursuant to 52 Pa. Code § 65.52, a lead service line (LSL) is a service line made of lead that connects the water main to a building inlet and a lead pigtail, gooseneck or other fitting that is connected to the lead line. A galvanized service line is considered a lead service line if it ever was or is currently downstream of any lead service line or service line of unknown material. Please provide a revised LSLR Plan and revised Pro Forma Tariff that include a Lead Service Line Definition that complies with 52 Pa. Code § 65.52.
- P-23. In the LSLR Plan’s Appendix B, PWSA included a copy of the Authorization for Replacement of the Lead Service Line on Your Property form (LSLR Authorization Form). The LSLR Authorization Form included the following language: “If Pittsburgh Water determines, in its sole discretion, that replacement of the portion of the lead water service line owned by the property owner at a particular property or related interior plumbing modification is not technically feasible safe and secure conditions are not present, or will result in excess expense, due to conditions such as length, terrain, obstructions, structures, pavement, trees, or other utilities, Pittsburgh Water may exclude such property from the Program and not replace the remaining portion of the lead water service line.” The Commission notes that the LSLR Authorization Form appears to allow PWSA to complete a partial LSLR. Further, PWSA should have already completed its feasibility assessment for a particular LSLR prior to submitting the LSLR Authorization Form to the customer. Pursuant to 52 Pa. Code § 65.62(b), an entity may not install, or cause to be installed, a partial LSLR. Please submit a revised LSLR Authorization Form that removes any language that indicates PWSA may complete the replacement of a portion of the customer-owned LSL and clarifies that PWSA will complete the replacement of the customer-owned portion of the LSL in its entirety.
- P-24. In the Pro Forma Tariff, Section 1.f., PWSA included a definition (Partial Lead Service Line Replacement) for “Partial Lead Service Pipe Replacement” of “[t]he replacement of a Customer Lead Service Line without the simultaneous replacement of a connected Public Lead Service Line”. However, the Partial Lead Service Line Replacement Definition does not comply with Commission LSLR regulations. Pursuant to 52 Pa. Code § 65.52, a partial LSLR is defined as a lead service line replacement that does not replace both the entity-owned and customer-owned portions of a lead service line. Please provide a revised Pro Forma Tariff, in redline format, that includes a definition for a partial LSLR that complies with 52 Pa. Code § 65.52.

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- P-25. In the Pro Forma Tariff, Section 2.b., PWSA indicated that the LSLR Plan applies to any LSL where the replacement of which is operationally feasible. However, pursuant to 52 Pa. Code § 65.52(a), an entity, other than a municipal corporation, shall remove and replace **all** [emphasis added] LSLs, whether entity-owned or customer-owned, within or connected to its water distribution systems within 25 years from the effective date of this section for a Class A public utility or authority. The Commission notes that the replacement of LSLs is not conditioned on operational feasibility and an offer for an LSLR shall be extended to all customers with an LSL. Please provide responses to the following:
- a. If it is PWSA’s intent to prioritize LSLRs to properties with more difficult or challenging replacements on a different schedule than standard LSLRs, submit a revised LSLR Plan that details the basis for determining the feasibility factors that would cause PWSA to shift the LSLR to a later date and indicate how PWSA will track those properties that have had an LSLR deferred due to feasibility challenges. The Commission notes that partial LSLRs are not permitted in order to facilitate deferring LSLRs to include extending an entity-owned LSL with new service line material to a new main; and
 - b. Submit a revised Pro Forma Tariff that removes the following tariff language “(3) the replacement of which is operationally feasible;” from Part VI, Section 2.b.; or
 - c. If it is PWSA’s intent to not complete LSLRs to properties with more difficult or challenging replacements, submit a revised LSLR Plan that details the basis for determining the feasibility factors that would cause PWSA to determine an LSLR is not feasible and indicate that this determination by PWSA will result in the termination of public water service to the property. The Commission notes that any portion of a customer-owned LSL that is not replaced up to the point of demarcation with the internal plumbing as part of the LSLR is considered a partial LSLR and is strictly prohibited; and
 - d. Submit a revised Pro Forma Tariff that adds tariff language to Part VI, Section 3.f. that enables PWSA to terminate service based on PWSA’s determination that an LSLR is not feasible due to conditions such as terrain, obstructions, structures, pavement, trees, or other utilities. The Commission notes that an LSLR must be completed regardless of expense unless the entity determines the LSLR may not be completed due to safety.
- P-26. In the Pro Forma Tariff, Section 4.b., PWSA specified that reimbursements will be issued no later than 45 days after the request is approved. However, this reimbursement term does not comply with Commission LSLR regulations. Pursuant to 52 Pa. Code § 65.58(d)(1)(ii), an entity’s *pro forma* tariff supplement reimbursement provisions must include the length of time by which the entity will issue a reimbursement for an eligible reimbursement request. Also, PWSA response to Data Request A-18 indicated that once the property owner submits the final plumber invoice and Allegheny County Health

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Department inspection report, a check is issued within 45 days. PWSA's response conflicts with the Tariff Supplement's Section 4.b., which specifies that reimbursements will be issued no later than 45 days after the request is approved, rather than 45 days from when the property owner submits the final plumber invoice and Allegheny County Health Department inspection report. Please provide a revised Pro Forma Tariff, in redline format, that includes reimbursement provisions that comply with 52 Pa. Code § 65.58(d)(1)(ii), such as by indicating the number of days after which PWSA will issue a reimbursement for an eligible reimbursement request, including PWSA's time to review and approve or deny requests.

- P-27. Pursuant to 52 Pa. Code § 65.58(c)(4), an entity's *pro forma* tariff supplement partial LSLR provisions must specify that the entity shall not connect an applicant for water service to the entity-owned service line at a property where a customer or property owner, if the customer is not the property owner, previously refused or failed to accept an entity's offer of a LSLR until the applicant verifies the replacement of the customer-owned LSL by providing a paid invoice from a licensed contractor where applicable or a verified statement from a licensed contractor attesting to completion of the LSLR. Please provide a revised Pro Forma Tariff, in redline format, that includes partial LSLR provisions that comply with 52 Pa. Code § 65.58(c)(4).
- P-28. Please provide revised LSLR Plan Appendixes to include revised copies of print and broadcast materials to be distributed under PWSA's LSLR Program, to the extent that the information provided in printed and broadcast materials does not conform with PWSA's revised LSLR Plan and Pro Forma Tariff provided in response to these Data Requests.
- P-29. Please confirm that PWSA's Modified LTIP does not include any modification to is Eligible Sewer System Property to be Improved or its Sewer System Eligible Properties Project Schedules and Costs.