

March 13, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of the Pittsburgh Water and Sewer Authority for Waiver of Provisions of Act 11 to Increase the DSIC Cap, to Permit Levelization of DSIC Charges, and to Authorize the Pay-As-You-Go Method of Financing – Docket No. P-2020-3019019

Waiver of Answer Period

Dear Secretary Chiavetta:

On March 3, 2020, the Pittsburgh Water and Sewer Authority (“PWSA”) filed the above-captioned Petition to begin to charge a Distribution System Improvement Charge (“DSIC”) to permit levelization of the DSIC charges and to authorize the use of the pay-as-you-go financing of DSIC eligible infrastructure improvements (“DSIC Petition”). By rule (52 Pa. Code § 5.61), answers to the DSIC Petition are due on or before March 23, 2020.

On March 6, 2020 PWSA filed a general rate increase request docketed at R-2020-3017951 (water) and R-2020-3017970 (wastewater) (“General Rate Case”). Also on March 6, PWSA filed a Petition for Consolidation of the DSIC Petition and the General Rate Case.

PWSA believes that the DSIC Petition and the General Rate Case should be considered together as the resolution of the DSIC Petition will have a material effect on the resolution of the General Rate Case. For this reason, PWSA submits that responses to the merits of the DSIC Petition should be made in the context of the General Rate Case and that there is no need for separate answers to be filed to the DSIC Petition.

Accordingly, PWSA respectfully requests that the Commission waive any requirement that parties separately file an answer to the DSIC Petition, grant the Petition for Consolidation and direct that the merits of the DSIC Petition be adjudicated in the course of the General Rate Case. PWSA hereby waives any right it may have to receive answers to the DSIC Petition from any party by the due date established by PUC Rules, and will not assert that any answer that might be filed by any party is untimely regardless of when that answer is filed.

PWSA has shared the contents of this letter with the Parties from PWSA's prior cases¹ and none has expressed opposition to the requests set forth above.

Please contact me if you have any questions regarding the content of this letter.

Sincerely,

A handwritten signature in cursive script that reads "Daniel Clearfield". The signature is written in dark ink and is positioned above the printed name.

Daniel Clearfield

DC/lww

cc: Cert. of Service

¹ These entities include: (1) the Bureau of Investigations and Enforcement; (2) the Office of Consumer Advocate; (3) the Office of Small Business Advocate; and, (2) Pittsburgh UNITED.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PWSA's foregoing letter upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Hand Delivery

Sharon Webb, Esq.
Erin K. Fure, Esq.
Office of Small Business Advocate
Forum Place Building
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
swebb@pa.gov
efure@pa.gov

Christine Maloni Hoover, Esq.
Erin L. Gannon, Esq.
Lauren E. Guerra, Esq.
Office of Consumer Advocate
555 Walnut St., 5th Fl., Forum Place
Harrisburg, PA 17101-1923
choover@paoca.org
egannon@paoca.org
lguerra@paoca.org

Gina L. Miller, Esq.
John M. Coogan, Esq.
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North St., 2nd Floor West
Harrisburg, PA 17120
ginmiller@pa.gov
jcoogan@pa.gov

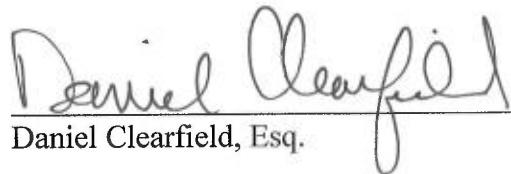
Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
The Pennsylvania Utility Law Project
118 Locust St.
Harrisburg, PA 17101
pulp@palegalaid.net

Michael A. Gruin, Esq.
Stevens & Lee
17 North Second St., 16th Fl.
Harrisburg, PA 17101
mag@stevenslee.com

Via First Class Mail

Dimple Chaudhary, Esquire
Peter J. DeMarco, Esquire
Cecilia Segal, Esquire
Natural Resources Defense Council
1152 15th Street, NW, Ste. 300
Washington, DC 20005
dchaudhary@nrdc.org
pdemarco@nrdc.org
csegal@nrdc.org

Brian Kalcic
Excel Consulting
225 S. Meramec Ave., Suite 720T
St. Louis, MO 63105
Excel.consulting@sbcglobal.net


Daniel Clearfield, Esq.

Dated: March 13, 2020