

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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April 1, 2020

Via Electronic Mail Only

Daniel Clearfield, Esquire
Deanne O'Dell, Esquire
Eckert, Seamans, Cherin, & Mellott, LLC
213 Market Street
8th Floor
Harrisburg, PA 17101

Re: Pennsylvania Public Utility Commission
v.
Pittsburgh Water and Sewer Authority
Docket Nos. R-2020-3017951 (Water)
C-2020-3019348
R-2020-3017970 (Wastewater)
C-2020-3019349

Dear Counsel:

Enclosed you will find two copies of Interrogatories of the Office of Consumer Advocate, Set I, Set II, and Set III, in the above-referenced proceedings.

In accordance with the Commission's Rules of Practice and Procedure, we request that the Authority provide verified answers to these inquiries within fifteen (15) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed. We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

We also request that you send a copy of the answers directly to our consultants, as listed below:

Roger D. Colton
Fisher, Sheehan, & Colton
34 Warwick Road
Belmont, MA 02478
E-Mail: OCAPWSA2020@paoca.org

Daniel Clearfield, Esquire
Deanne O'Dell, Esquire
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Page 2

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code § 5.341(b).

Sincerely,

/s/ Christine Maloni Hoover
Christine Maloni Hoover
Senior Assistant Consumer Advocate
PA Attorney I.D. # 50026
E-Mail: CHoover@paoca.org

Enclosures:

cc: PUC Secretary Rosemary Chiavetta, (Letter and Certificate of Service only)
Certificate of Service

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CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission :
v. : Docket Nos. R-2020-3017951 (Water)
Pittsburgh Water and Sewer Authority : R-2020-3017970 (Wastewater)

I hereby certify that I have this day served a true copy of the following documents, the Office of Consumer Advocate's Interrogatories to Pittsburgh Water and Sewer Authority, Set I, Set II, and Set III, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Dated this 1st day of April 2020.

SERVICE BY E-MAIL ONLY

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John M. Coogan, Esquire
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
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Dated: April 1, 2020
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