

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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April 13, 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 the Interrogatories of the Office of Consumer Advocate, Set X, in the above-referenced proceedings.

In accordance with the Commission's Rules of Practice and Procedure, we request that PWSA 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:

Dante Mugrace  
PCMG and Associates  
90 Moonlight Court  
Toms River, NJ 08753  
E-Mail: [OCAPWSA2020@paoca.org](mailto:OCAPWSA2020@paoca.org)

Daniel Clearfield, Esquire  
Deanne O'Dell, Esquire  
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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

\*286373

CERTIFICATE OF SERVICE

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

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 X, 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 13<sup>th</sup> day of April 2020.

**SERVICE BY E-MAIL ONLY**

Gina L. Miller, Esquire  
John M. Coogan, Esquire  
Bureau of Investigation & Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
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Harrisburg, PA 17120

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Brian Kalcic  
Excel Consulting  
225 S. Meramec Avenue  
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St. Louis, MO 63105

/s/ Christine Maloni Hoover  
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John W. Sweet, Esquire  
Pennsylvania Utility Law Project  
118 Locust Street  
Harrisburg, PA 17101

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Dated: April 13, 2020  
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