

COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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April 30, 2020

**Via Electronic Mail Only**

Daniel Clearfield, Esquire  
Deanne O'Dell, Esquire  
Karen O. Moury, 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

Petition of 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

Dear Counsel:

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

In accordance with the Commission's Rules of Practice and Procedure, as modified during the April 22, 2020 Prehearing Conference, we request that PWSA provide verified answers to these inquiries within ten (10) days of service on a best-efforts basis, but no later than 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.

Daniel Clearfield, Esquire  
Deanne O'Dell, Esquire  
Karen O. Moury, Esquire  
April 30, 2020  
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We also request that you send a copy of the answers directly to our consultant, as listed below:

Scott J. Rubin  
333 Oak Lane  
Bloomsburg, PA 17815  
E-Mail: [OCAPWSA2020@paoca.org](mailto:OCAPWSA2020@paoca.org)

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](mailto:CHoover@paoca.org)

Enclosures:

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

\*287545

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

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 XIII, 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 30<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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Dated: April 30, 2020  
\*287547