



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

May 1, 2020

Via Electronic Mail

Deanne M. O'Dell, Esq.
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) and R-2020-3017970 (wastewater)

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 Attorney O'Dell:

Enclosed please find a copy of the Bureau of Investigation & Enforcement's (I&E) **Interrogatories – I&E-RS (nos 13-15)**. Please restate each Interrogatory before responding and start each Interrogatory and response on a separate page. The responses should identify the responding persons.

Pursuant to the outcome of the first Prehearing Conference held in this matter on April 22, 2020, the responses to these Interrogatories are due within fifteen (15) calendar days, but PWSA has committed to use its best efforts to answer them within ten (10) days. Please forward your responses via email to ginmiller@pa.gov and jcoogan@pa.gov.

Consistent with Paragraph 8 of the Commission's March 20, 2020 Emergency Order at Docket No. M-2020-3019262 (Re: Suspension of Regulatory and Statutory Deadlines; Modification to Filing and Service Requirements), electronic copies only are being served on all active parties of record as evidenced in the attached Certificate of Service. If you have any questions, please do not hesitate to contact me.

Respectfully,

John M. Coogan, Esq.
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 313920
(717) 783-6151
jcoogan@pa.gov

JMC/ac
Enclosures

cc: Secretary Rosemary Chiavetta (*Cover Letter and Certificate of Service only via e-file*)
Per Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2020-3017951
	:	
Pittsburgh Water and Sewer Authority - Water	:	
	:	
Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2020-3017970
	:	
Pittsburgh Water and Sewer Authority - Wastewater	:	
	:	
Petition of Pittsburgh Water and Sewer Authority	:	
For Waiver of Provisions of Act 11 to Increase the	:	
DSIC CAP, to Permit Levelization of DSIC	:	Docket No. P-2020-3019019
Charges, and to Authorize the Pay-As-You-Go	:	
Method of Financing	:	

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatories** dated May 1, 2020
in the manner and upon the persons listed below:

Served via Electronic Mail Only

Deanne M. O'Dell, Esq.
Daniel Clearfield, Esq.
Karen O. Moury, Esq.
Eckert Seamans Cherin & Mellott LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
dodell@eckertseamans.com
dclearfield@eckertseamans.com
kmoury@eckertseamans.com

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


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

Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Ria Pereira, Esq.
The Pennsylvania Law Utility Project
118 Locust Street
Harrisburg, PA 17102
pulp@palegalaid.net
Counsel for Pittsburgh UNITED

Roger D. Colton
Fisher Sheehan & Colton
34 Warwick Road
Belmont, MA 02478
roger@fsconline.com

Yvonne S. Hilton, Esq.
John F. Doherty, Esq.
Lawrence H. Baumiller, Esq.
John V. DeMarco, Esq.
City of Pittsburgh, Department of Law
City -County Building, Suite 313
414 Grant Street
Pittsburgh, PA 15219
yvonne.hilton@pittsburghpa.gov
john.doherty@pittsburghpa.gov
lawrence.baumiller@pittsburghpa.gov
john.demarco@pittsburghpa.gov

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue
Suite 720T
St. Louis, MO 63105
excel.consulting@sbcglobal.net
Witness for OCA



John M. Coogan, Esq.
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 313920