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July 8, 2020

Via Electronic Filing

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

Re: Implementation of Chapter 32 of the Public Utility Code Re: Pittsburgh Water and Sewer Authority; Docket Nos. M-2018-2640802 and M-2018-2640803

Petition of the Pittsburgh Water and Sewer Authority for Approval of Its Long-Term Infrastructure Improvement Plan; Docket Nos. P-2018-3005037 and P-2018-3005039

Dear Secretary Chiavetta:

On behalf of the Pittsburgh Water and Sewer Authority's ("PWSA") enclosed please find Responses to the Technical Utility Service's Data Request 1 as served on July 1, 2020.

Copies to be served in accordance with the attached Certificate of Service.

Sincerely,

A handwritten signature in blue ink that reads "Deanne M. O'Dell". The signature is fluid and cursive.

Deanne M. O'Dell

Enclosure

cc: Hon. Conrad Johnson w/enc.(email only)
Hon. Mark Hoyer w/enc. (email only)
John Van Zant w/ enc. (via email only to jvanzant@pa.gov)
Ken Shaffer w/ enc. (via email only kennshaffe@pa.gov)
Certificate of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the PWSA's Responses to TUS Data Requests Set 1 upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via First Class Mail and/or Email

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Dated: July 8, 2020

A handwritten signature in dark ink, reading "Deanne M. O'Dell". The signature is written in a cursive, flowing style. The first name "Deanne" is written in a larger, more prominent script, followed by "M." and "O'Dell". The signature is positioned above a horizontal line.

Deanne M. O'Dell, Esq.

The Pittsburgh Water and Sewer Authority (PWSA) Responses to
Technical Utility Service (TUS) Data Request 1
Amended LTIIIP
Docket Nos. P-2018-3005037 and P-2018-3005039

Request No. 1: On April 28, 2020, Kristine Marsilio emailed Ken Shaffer in TUS with Excel versions of Amended tables 2-6 and 5-1 in PWSA's Amended LTIIIP Filing. Please formally file these tables with the Commission.

PWSA Response to Request No. 1: A complete version of the April 27, 2020 Amended LTIIIP including Amended tables 2-6 and Figure 5-1 as well as the unchanged Appendices from PWSA's initially filed LTIIIP on September 28, 2018 was filed on July 7, 2020.

Request No. 2: In the Amended filing an Appendix B is referenced, but not included. Is it to be understood that the unamended tables in Appendix B of PWSA's original LTIIIP stand as filed and will not be updated?

- a. If answering in the negative to question 2 above, please provide all amended and updated tables for Appendix B.

PWSA Response to Request No. 2: Yes, as noted in the cover letter submitted with the April 27, 2020 filing, Tables 2-4, 2-5, 3-2, 3-6, 4-1, 4-2, and 7-2 encompassing the remainder of Appendix B were not updated and were not included with the April 27, 2020 filing. However, a complete version of the April 27, 2020 Amended LTIIIP including the unchanged Appendices from PWSA's initially filed LTIIIP on September 28, 2018 was filed on July 7, 2020.

Request No. 3: In the Amended filing, updated table 2-6 included projected expenditures for year 2024. Is this a projection merely for reference purposes, or does PWSA intend to include 2024 in its LTIIIP?

- a. If answering in the affirmative to question 3, above, please provide all necessary amended and updated tables.

PWSA Response to Request No. 3: The projected expenditures for year 2024 are included for reference purposes only.

VERIFICATION

I, Edward Barca hereby state that I am Deputy Director of Finance/Treasurer of The Pittsburgh Water and Sewer Authority. I hereby verify that the facts set forth in the attached discovery responses which I am sponsoring are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).



Dated July 8, 2020

Edward Barca, Deputy Director of Finance/Treasurer
The Pittsburgh Water and Sewer Authority