


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

555 Walnut Street, 5th Floor, Forum Place
Harrisburg, Pennsylvania 17101-1923
(717) 783-5048
800-684-6560

 @pa_oca

 /pennoca

FAX (717) 783-7152
consumer@paoca.org

August 20, 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 XXIV, 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
August 20, 2020
Page 2

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

Barbara R. Alexander
Barbara Alexander Consulting, LLC
83 Wedgewood Drive
Winthrop, Maine 04364
E-Mail: 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).

Respectfully submitted,

/s/ Santo G. Spataro
Santo G. Spataro
Assistant Consumer Advocate
PA Attorney I.D. # 327494
E-Mail: SSpataro@paoca.org

Enclosures:

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

*294443

CERTIFICATE OF SERVICE

Re: Pennsylvania Public Utility Commission : Docket Nos. R-2020-3017951 (Water)
v. : C-2020-3019348
: R-2020-3017970 (WW)
Pittsburgh Water and Sewer Authority : C-2020-3019349
:
Petition of Pittsburgh Water and Sewer :
Authority for Waiver of Provisions of Act 11 : Docket No. P-2020-3019019
to Increase 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 document, the Office of Consumer Advocate's Interrogatories to Pittsburgh Water and Sewer Authority (PWSA), Set XXIV, 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 20th day of August 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
400 North Street, 2nd Floor
Harrisburg, PA 17120

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

Yvonne S. Hilton, Esquire
John F. Doherty, Esquire
Lawrence H. Baumiller, Esquire
City of Pittsburgh Department of Law
City-County Building
414 Grant Street, Suite 313
Pittsburgh, PA 15219

Sharon E. Webb, Esquire
Erin K. Fure, Esquire
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101-1923

Ria M. Pereira, Esquire
Elizabeth R. Marx, Esquire
John W. Sweet, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101

Thomas J. Sniscak, Esquire
Kevin J. McKeon, Esquire
Whitney E. Snyder, Esquire
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101

Brian Kalcic
Excel Consulting
225 S. Meramec Avenue
Suite 720 T
St. Louis, MO 63105

Ranjan R. Chaudhuri
113 Merriman Mews
Pittsburgh, PA 15203
ranjanraychaudhuri@gmail.com

Donald Kuhn
5827 Kentucky Ave.
Pittsburgh, PA 15232
donaljdkuhn@gmail.com

/s/ Santo G. Spataro
Santo G. Spataro
Assistant Consumer Advocate
PA Attorney I.D. # 327494
E-Mail: SSpataro@paoca.org

Erin L. Gannon
Senior Assistant Consumer Advocate
PA Attorney I.D. # 83487
E-Mail: EGannon@paoca.org

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

Lauren E. Guerra
Assistant Consumer Advocate
PA Attorney I.D. # 323192
E-Mail: LGuerra@paoca.org

Counsel for:
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
Phone: (717) 783-5048
Fax: (717) 783-7152
Dated: August 20, 2020
*294429