



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

BUREAU OF
INVESTIGATION
&
ENFORCEMENT

August 24, 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)
Interrogatory – I&E-RR (no. 13). Please restate the Interrogatory before responding. The response
should identify the responding person(s).

Pursuant to the outcome of the first Prehearing Conference held in this matter on April 22,
2020, the response to this Interrogatory is due within ten (10) days. Please forward your response via
email to jcoogan@pa.gov and ginmiller@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
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 313920

Gina L. Miller
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney ID No. 313863

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	:	Docket No. P-2020-3019019
CAP, to Permit Levelization of DSIC Charges, and to	:	
Authorize the Pay-As-You-Go Method of Financing	:	

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Interrogatory** dated August 24, 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
*Counsel for Pittsburgh Water and
Sewer Authority*

Thomas J. Sniscak, Esq.
Kevin J. McKeon, Esq.
Whitney E. Snyder, Esq.
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
kjmckeon@hmslegal.com
wesnyder@hmslegal.com
Counsel for The City of Pittsburgh

Christine Maloni Hoover, Esq.
Erin L. Gannon, Esq.
Lauren E. Guerra, Esq.
Santo G. Spataro, Esq.
Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
OCAPWSA2020@paoca.org

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

Elizabeth R. Marx, Esq.
John W. Sweet, Esq.
Ria M. 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
Witness for OCA

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

Yvonne S. Hilton, Esq.
John F. Doherty, Esq.
Lawrence H. Baumiller, 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
Counsel for the City of Pittsburgh

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

Olivia Wein, Esq.
National Consumer Law Center
1001 Connecticut Avenue, NW
Suite 510
Washington, DC 20036
owein@nclc.org
Witness for Pittsburgh UNITED

Dante Mugrace
PCMG and Associates
90 Moonlight Court
Toms River, NJ 08753
OCAPWSA2020@paoca.org
Consultant for OCA



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