



Eckert Seamans Cherin & Mellott, LLC  
213 Market Street  
8<sup>th</sup> Floor  
Harrisburg, PA 17101

TEL 717 237 6000  
FAX 717 237 6019  
www.eckertseamans.com

Deanne M. O'Dell  
717.255.3744  
dodell@eckertseamans.com

September 17, 2020

**Via Email**

Hon. Mary Long  
Hon. Emily Devoe  
Office of Administrative Law Judge  
PA Public Utility Commission  
301 5<sup>th</sup> Avenue, Suite 220  
Pittsburgh, PA 15222

Re: The Pittsburgh Water and Sewer Authority Base Rate Filing  
Docket Nos. R-2020-3017951; and, R-2020-3017970

Dear Judges Long and Devoe:

On May 15, 2020, the Pittsburgh Water and Sewer Authority (“PWSA”) served to Your Honors and the parties in this proceeding Supplemental Direct Testimony which included, among other issues, updated proposals regarding PWSA’s March 6, 2020 initial rate filing following the Commission’s March 26, 2020 Order.<sup>1</sup> Subsequently, on July 30, 2020, Governor Wolf signed into law Act 70 which provides that the Cooperation Agreement between PWSA and the City of Pittsburgh has “the full force and effect of law.”<sup>2</sup> **Given this change in law, PWSA has elected to withdraw the proposals set forth in its Supplemental Direct Testimony addressing issues governed by the Cooperation Agreement and revert to its initial proposals as set forth in its March 6, 2020 initial filing.**

To effectuate the withdrawal of its revised positions regarding City Cooperation issues, PWSA redacted the relevant portions of its Supplemental Direct Testimony and is serving copies of the revised Supplemental Direct Testimony herein. PWSA is not withdrawing issues addressed in the Supplemental Direct Testimony beyond those governed by the Cooperation Agreement.

---

<sup>1</sup> See *Implementation of Chapter 32 of the Public Utility Code Regarding Pittsburgh Water and Sewer Authority – Stage I*, Docket Nos. M-2018-2640802 and M-2018-2640803 (Order entered March 26, 2020).

<sup>2</sup> Act 70, Section 2802-G.

Listed below is the Supplemental Direct Testimony served on May 15, 2020 and information about whether PWSA will move to submit a revised version for the record. Supplemental Direct Testimony with no revisions will be moved for the record as served on May 15, 2020. Revised Supplemental Direct Testimony is included herein. .

<b>Witness</b>	<b>St. No.</b>	<b>Redacted Version?</b>
<b>Robert A. Weimar</b>	<b>St. No. 1-SD As Revised due to passage of Act 70</b>	<b>Yes</b>
<b>Debbie M. Lestitian</b>	<b>St. No. 2-SD As Revised due to passage of Act 70</b>	<b>Yes</b>
<b>Jennifer Presutti</b>	<b>St. No. 3-SD As Revised due to passage of Act 70</b>	<b>Yes</b>
Barry King, P.E.	St. No. 4-SD	No
Edward Barca	St. No. 5-SD	No
Thomas F. Huestis	St. No. 6-SD	No
<b>Harold J. Smith</b>	<b>St. No. 7-SD As Revised due to passage of Act 70</b>	<b>Yes</b>
<b>Julie Quigley</b>	<b>St. No. 8-SD As Revised due to passage of Act 70</b>	<b>Yes</b>
Beth Dutton	St. No. 9-SD	No

PWSA is not proposing any changes to its subsequently served written testimony (rebuttal and rejoinder) as a result of Act 70

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

Sincerely,



Deanne M. O'Dell

DMO/lww

Enclosure

cc: Cert. of Service w/enc.  
Rosemary Chiavetta, Secretary (COS only)

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PWSA's Supplemental Direct Testimony upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

### **Via Email Only**

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

Christine Maloni Hoover, Esq.  
Erin L. Gannon, Esq.  
Lauren E. Guerra, Esq.  
Santo G. Spataro, Esq.  
Office of Consumer Advocate  
555 Walnut St., 5<sup>th</sup> Fl., Forum Place  
Harrisburg, PA 17101-1923  
[choover@paoca.org](mailto:choover@paoca.org)  
[egannon@paoca.org](mailto:egannon@paoca.org)  
[lguerra@paoca.org](mailto:lguerra@paoca.org)  
[SSpataro@paoca.org](mailto:SSpataro@paoca.org)

Gina L. Miller, Esq.  
John M. Coogan, Esq.  
Bureau of Investigation & Enforcement  
Commonwealth Keystone Building  
400 North St., 2<sup>nd</sup> Floor West  
Harrisburg, PA 17120  
[ginmiller@pa.gov](mailto:ginmiller@pa.gov)  
[jcoogan@pa.gov](mailto:jcoogan@pa.gov)

Brian Kalcic  
Excel Consulting  
225 S. Meramec Ave., Suite 720T  
St. Louis, MO 63105  
[Excel.consulting@sbcglobal.net](mailto:Excel.consulting@sbcglobal.net)

Elizabeth R. Marx, Esq.  
John W. Sweet, Esq.  
Ria M. Pereira, Esq.  
The Pennsylvania Utility Law Project  
118 Locust St.  
Harrisburg, PA 17101  
[pulp@palegalaid.net](mailto:pulp@palegalaid.net)

Roger D. Colton  
Fisher, Sheehan & Colton  
34 Warwick Road  
Belmont, MA 02478  
[roger@fsconlin.com](mailto:roger@fsconlin.com)

Yvonne S. Hilton, City Solicitor  
John F. Doherty, Associate City Solicitor  
Lawrence H. Baumiller, Assistant City  
City of Pittsburgh Department of Law  
City-County Building, Suite 313  
414 Grant Street  
Pittsburgh, PA 15219  
[yvonne.hilton@pittsburghpa.gov](mailto:yvonne.hilton@pittsburghpa.gov)  
[john.doherty@pittsburghpa.gov](mailto:john.doherty@pittsburghpa.gov)  
[lawrence.baumiller@pittsburghpa.gov](mailto:lawrence.baumiller@pittsburghpa.gov)

Thomas J. Sniscak, Esq.  
Kevin J. McKeon, Esq.  
Whitney E. Snyder, Esq.  
Hawke McKeon & Sniscak, LLP  
100 North Tenth Street  
Harrisburg, PA 17101  
[kjmckeon@hmslegal.com](mailto:kjmckeon@hmslegal.com)  
[tjsniscak@hmslegal.com](mailto:tjsniscak@hmslegal.com)  
[wesnyder@hmslegal.com](mailto:wesnyder@hmslegal.com)



Dated: September 17, 2020

---

Deanne M. O'Dell, Esq.