

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

SUPPLEMENTAL DIRECT TESTIMONY OF

BETH DUTTON

ON BEHALF OF
THE PITTSBURGH WATER
AND SEWER AUTHORITY

Docket Nos.

R-2020-3017951 (Water)

R-2020-3017970 (Wastewater)

TOPICS:

STORMWATER

May 15, 2020

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1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND CURRENT POSITION WITH PWSA.**

3 A. My name is Beth Dutton. I am the Senior Group Manager, Stormwater for The
4 Pittsburgh Water and Sewer Authority (“PWSA” or “Authority”).

5 **Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS PROCEEDING?**

6 A. Yes, I submitted Direct Testimony on March 6, 2020 which accompanied the rate filing
7 package.

8 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT TESTIMONY?**

9 A. The purpose of this testimony is to: (1) modify PWSA’s projected timeline for proposal
10 of a stormwater fee; and (2) to correct an error in the stormwater tariff that came to light
11 during the discovery process.

12 **II. MODIFIED TIMELINE FOR STORMWATER FEE PROPOSAL**

13 **Q. IN YOUR DIRECT TESTIMONY, WHAT TIMELINE DID YOU PROVIDE FOR**
14 **PWSA TO PROPOSE A STORMWATER FEE?**

15 A. My direct testimony stated that PWSA anticipated proposing specific stormwater rates
16 during the third quarter of 2020 leading to a tariff decision by the Commission about nine
17 months later. (PWSA St. No. 9 at 28.)

18 **Q. ARE YOU PROPOSING A CHANGE TO THIS ANTICIPATED TIMELINE?**

19 A. Yes. PWSA now anticipates that it will be prepared to propose stormwater rates late in
20 the fourth quarter of 2020.

21 **Q. WHY ARE YOU PROPOSING THIS CHANGE?**

22 A. This delay of a few months will provide PWSA with additional time to more thoughtfully
23 develop its stormwater rate proposal particularly in light of changing circumstances due

1 to the COVID-19 pandemic. As discussed in my direct testimony, significant
2 background work must be completed before PWSA has the information necessary to
3 propose stormwater rates. As PWSA and other entities involved in this process continue
4 to evaluate and address issues related to COVID-19, the additional time will be useful in
5 gathering this information and fully developing PWSA's proposals, as well as educating
6 the public. It will also better align with PWSA's annual budgeting process which
7 typically concludes in October. This slight adjustment will not affect PWSA's overall
8 timeline to implement stormwater rates in early 2022.

9 **III. CORRECTION TO STORMWATER TARIFF LANGUAGE**

10 **Q. DO YOU HAVE A CORRECTION TO THE PROPOSED STORMWATER**
11 **TARIFF?**

12 A. Yes. As indicated in response to OCA-V-30, language from PWSA's wastewater tariff
13 was inadvertently included in Part III, Section L.2 of the proposed stormwater tariff.
14 This tariff language has been modified for purposes of the stormwater tariff and is
15 attached as Exhibit BD

16 **IV. CONCLUSION**


17 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

18 A. Yes. However, I reserve the right to supplement this testimony as may be appropriate.

VERIFICATION

I, Beth Dutton, hereby state that: (1) I am the Senior Group Manager, Stormwater for The Pittsburgh Water and Sewer Authority (“PWSA”); (2) the facts set forth in my testimony are true and correct (or are true and correct to the best of my knowledge, information and belief); and, (3) I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 15, 2020



Beth Dutton
Senior Group Manager, Stormwater
The Pittsburgh Water and Sewer Authority

Exhibit BD-5

The Pittsburgh Water
And Sewer Authority

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2. No Person shall discharge or permit the discharge or infiltration of any of the following substances into any Authority storm drain or sewer:
- a. mineral acids, waste acid, pickling or plating of liquors from the pickling or plating of iron, steel, brass, copper, or chromium, or any other dissolved or solid substances, ~~in such amounts that shall endanger health or safety, interfere with the flow in sewers, attack or corrode sewers, or otherwise interfere with the operation of the Sewer System or ALCOSAN;~~
 - b. cyanides or cyanogen compounds capable of liberating hydrocyanic gas on acidification
 - c. gas tar, phenols in concentrations greater than 60 parts per million, residues from petroleum storage, refining or processing, excess fuel or lubricating oil, gasoline, naphtha, benzene, or explosive, flammable liquids, solids, or gases;
 - d. ashes, cinders, sand, mud, lime, or acetylene sludges, straw, shavings, metals, glass, rags, feathers, tar, plastics, wood, sawdust, paunch manure, hair, hides, dead animals, spent mash and grain, pulp from food processing, water or wastes containing excess grease, cement or cementitious materials, or any other solid, semi-solid, or viscous substances capable of causing obstruction to the flow in sewers or other Interference with the proper operation of the Authority's or ALCOSAN's facilities;
 - i. The combined concentration of oil and grease shall not exceed 200 parts per million.
 - e. sludges or other materials from septic tanks or similar facilities or from sewage or industrial waste treatment plants or from water treatment plants, ~~unless the discharge of such sludges and other materials as permitted by existing permits, regulations, code, or orders of the Authority, the City, the Health Department, ALCOSAN, or the Commonwealth;~~
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- f. garbage, whether ground or not, ~~except properly shredded garbage In a private Dwelling Unit, hotel, commercial restaurant, or retail food store resulting from the proper use of a garbage grinder or disposer of a type approved by the City, the Health Department, or ALCOSAN and maintained in good operating condition;~~
 - g. water or wastes ~~having a pH lower than 5.0 or higher than 10.0 or~~ having any ~~other~~ corrosive property capable of causing damage or hazard to structures, equipment, or individuals;
 - h. any industrial, commercial, or medical waste or discharge ~~that violates Categorical or General Pretreatment Standards as established by authorized agencies of the federal government or of the Commonwealth of Pennsylvania or which violates specific ALCOSAN discharge standards;~~
 - i. any waste that exceeds the naturally occurring background levels for alpha, beta, or gamma radiation or any Wastewater containing any radioactive wastes or Isotopes of half-life or concentration ~~not In compliance with applicable federal or state regulations;~~
 - j. any wastes that are defined or listed as hazardous under the laws and regulations of the federal government or the Commonwealth of Pennsylvania; or
 - k. any noxious or malodorous liquids, gases, or solids that either singly or in combination with other wastes may create a public nuisance or adversely affect public health or safety.