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| PUC logo | COMMONWEALTH OF PENNSYLVANIA  PENNSYLVANIA PUBLIC UTILITY COMMISSION  400 NORTH STREET, HARRISBURG, PA 17120 | **IN REPLY PLEASE REFER TO OUR FILE** |

January 24, 2019

Docket No. R-2019-3007103

Utility Code 210260

THOMAS T NIESEN ESQUIRE

THOMAS NIESEN & THOMAS LLC

212 LOCUST STREET SUITE 302

hARRISBURG pa 17101

RE: Buck Hill Water Company Supplement No. 32 to Tariff Water – Pa. P.U.C. No. 3 at Docket No. R-2019-3007103

Dear Attorney Niesen:

On January 11, 2019, Buck Hill Water Company filed the above-captioned document with the Pennsylvania Public Utility Commission. For the Commission to complete its analysis of the filing, responses are required for the attached data requests. Please forward the requested information to the Commission within 10 working days of the date of this letter.

Please send all responses to the Secretary of the Commission at the following address:

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| --- |
| Secretary, Pennsylvania Public Utility Commission  400 North Street, 2nd Floor  Harrisburg, Pennsylvania 17120 |

All documents requiring notary stamps must have original signatures. Some responses may be e-filed at <http://www.puc.pa.gov/efiling/default.aspx>. A list of allowable e-filing document types is available at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

**Please note that your answers must be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

*I,* [print name of appropriate company representative], *hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that 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).*

Signature \_\_\_\_\_\_\_\_

Title \_\_\_\_\_\_\_\_\_\_\_\_

Date \_\_\_\_\_\_\_\_\_\_\_\_

*I, \_* [print name of appropriate company representative], *hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that 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).*

Signature \_\_\_\_\_\_\_\_

Title \_\_\_\_\_\_\_\_\_\_\_\_

Please contact the below staff person if any problems should arise that prevent a full response within ten working days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the application, please send a copy of the information to Paul Zander via e-mail at[**pzander@pa.gov**](mailto:pzander@pa.gov). Questions may be directed to Paul Zander in the Bureau of Technical Utility Services, Water/Wastewater Division at telephone number (717) 783-1372. Thank you in advance for your cooperation.

****Sincerely,

Rosemary Chiavetta

Secretary

Enclosure

cc: Tanya McCloskey, Office of Consumer Advocate (w/enclosure)

John Evans, Office of Small Business Advocate (w/enclosure)

Richard Kanaskie, PUC Bureau of Investigation and Enforcement (w/enclosure)

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

1. Buck Hill Water Company’s (BHWC’s) proposed tariff supplement (Supplement) does not appear to fully comply with applicable Commission regulations. Please revise the following Supplement pages to comply with Commission regulations found in Title 52 of the Pennsylvania Code:
   1. Title Page
      1. Section 53.21(10) requires title pages to contain certain notice language at the bottom of the tariff page. This language does not appear on the Supplement.
      2. Section 53.22 requires all modification to be identified. The Supplement appears to modify the name of BHWC’s responsible official. This modification does not appear to be identified.
   2. Page No. 2 - Section 53.22 requires all modifications to be identified. Page No. 2 “LIST OF CHANGES” does not appear to identify changes on Page No. 1 and Page No. 4.
   3. Page No. 4 – Section 53.22 requires all modifications to be identified. Page No. 4 does not appear to identify changes to the “Service Termination and Resumption Rates” section.
2. BHWC’s response to 52 Pa. Code §53.52(b)(3) indicates the Supplement proposes a 34.57% rate increase for all customer classes. However, the Supplement does not appear to increase rates for 6-inch meter customers and bulk water customers by 34.57%. Please either revise the Supplement to correct this issue or provide an explanation for why a different increase amount is proposed for these customer classes.
3. The Supplement contains a new sentence at the end of the “Service Termination or Resumption Rates” section. Please address the following:
   1. Please indicate whether this sentence is a clarification of service terms and conditions or a change in service terms and conditions. If this sentence is a change in service terms and conditions, please provide required responses pursuant to 52 Pa. Code § 53.52(a).
   2. Please explain why the fee is permissive as opposed to compulsory (i.e., the fee “may” be billed, as opposed to “shall”).
4. Please provide signed verification statements for the filing.
5. Please provide evidence of BHWC’s compliance with each term of Section 5 of the Joint Petition for Settlement at Docket No. R-00049493 and the associated BHWC notices required pursuant to 52 Pa. Code § 5.591. If BHWC will not fully comply with each settlement term, please provide an explanation for each term.
6. Please provide working electronic copies of the filing’s schedules (i.e., Excel spreadsheets, etc.).
7. Please provide copies of BHWC’s federal tax returns for the last two years.
8. Please provide a map of BHWC’s distribution system. This map should indicate the location of fire hydrants.
9. Please confirm if BHWC hydrants are used to bleed water during winter months.
10. Please provide a copy of a recent bill for a residential customer located within the Buck Hill Falls community, a recent bill for a residential customer located outside of the Buck Hill Falls community, and a recent bill for a non-residential customer.
11. Please indicate whether BHWC charges any fee for returned payments (i.e., payments returned for insufficient funds or other reasons). If so, please indicate the amount and whether this fee is found in BHWC’s tariff.
12. Please provide BHWC meter reading data for each commercial customer for the 12 months ended September 30, 2018.
13. Please verify that all properties owned by Buck Hill Falls Company are billed applicable tariff rates for service. If properties are not billed, please identify the facilities that are not billed and the associated unbilled revenue during the test year.
14. Please provide supporting documentation and working papers (i.e., BHWC unaudited financial statements or similar records) for the claimed BHWC per books values for the 12-month period ending September 30, 2018.
15. BHWC’s 2017 annual report indicates on Page 61, Line No. 13 that water was used for “Inn Demolition”. Please indicate the applicable tariff rates for water used for construction purposes and the entity billed for this water.
16. BHWC’s 2017 annual report indicates on Page 61, Line No. 27 that 2,425,000 gallons of water were used for a treatment plant. Please indicate whether the treatment plant is a BHWC customer and provide evidence (i.e., recent quarterly bills) that the treatment plant is billed applicable tariff rates for service.
17. The filing’s Page A-14 indicates seven of sixteen winter bleeders have been eliminated. However, BHWC’s 2017 annual report indicates on Page 61, Line No. 13 that there are fourteen bleeders. Please provide an explanation for this apparent discrepancy.
18. BHWC’s last rate filing at Docket No. R-00049493 identified three commercial connections with meters larger than 3/4-inch. However, the current filing’s Schedule I-1 indicates no customers have meters larger than 3/4-inch. Please reconfirm the number of customers, by meter size, with meters larger than 3/4-inch and revise Schedule I-1 as appropriate.
19. The filing’s Schedule I-1 indicates 1,161 residential bills and 7,888,300 gallons of water consumption for the 12 months ended September 30, 2018. However, the filing’s Schedule K-1 indicates 1,134 residential bills and 8,392,000 gallons of water consumption for the pro forma 12 months ending September 30, 2019. Please explain why BHWC anticipates fewer bills and greater consumption in the test year.
20. Please provide a justification for BHWC’s use of a 36-month normalization period for its rate case expense claim in the filing’s Schedule I-5.