

October 21, 2019

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

RECEIVED
2019 OCT 21 PM 2:29
Via Hand Delivery
PA PUC
SECRETARY'S BUREAU
RIGHT DESK

In re: Docket No. A-2019-3009052
Application of Aqua Pennsylvania Wastewater, Inc. pursuant to Sections 1102, 1329 and 507
of the Public Utility Code for Approval of its Acquisition of the Wastewater System Assets of
the Township of East Norriton

Dear Secretary Chiavetta:

We are counsel to Aqua Pennsylvania Wastewater, Inc. ("Aqua" or "Company") in connection with its above referenced Application, filed with the Public Utility Commission on July 30, 2019, pursuant to Sections 1102, 1329 and 507 of the Public Utility Code, for approval of the acquisition of the wastewater system assets of the Township of East Norriton. The Bureau of Technical Utility Services is reviewing the Application and has asked that we address certain requests for additional information. We addressed several requests in a letter filed with you on August 9, 2019. The remaining requests are addressed hereinafter.

INFORMATION REQUEST:

Checklist Item No. 18.c. – The *pro forma* tariff in the Application's Exhibit G does not appear to identify rates equal to certain existing rates of the seller referred to in the Application's Exhibit H. Provide either a revised *pro forma* tariff containing the existing rates of the seller or copies of effective ordinance(s) and/or resolution(s), including exhibits, repealing or amending the following East Norriton wastewater rates:

- a. §162-22.A., regarding rates for metered water users;
- b. §162-22.B., regarding rates for customers connected to the sewer system and receiving unmetered water service;
- c. §162-22.C., regarding volumetric rates for customers served by a shared lateral being determined by dividing the customers' total water usage by the number of customers served by the shared lateral;
- d. §162-23.B., regarding an additional charge for certain industrial wastes;
- e. §162-24.A.(3), regarding rate reductions for customers with deduct meters; and

- f. Additionally, Exhibit H does not identify the rates for East Norriton customers connected to Whitpain Township indicated in the Application's Exhibit G as Special Charges.

RESPONSE:

- a. Please see the current rate ordinances provided with our letter of August 9, 2019 addressing Checklist Item No. 18.b.
- b. Please see the current rate ordinances provided with our letter of August 9, 2019 addressing Checklist Item No. 18.b.
- c. Please see the attached letter from East Norriton Township dated August 12, 2019 stating that it does not have customers that fit this classification.
- d. Please see the attached letter from East Norriton Township dated August 12, 2019 stating that it does not have customers that fit this classification.
- e. Deduct meters are a billing determinant and not a separate rate. East Norriton Township nets out deduct meter reading consumption against total consumption.
- f. The rates charged to approximately 9 customers connected to Whitpain Township mains are subject to agreements between East Norriton Township and Whitpain Townships, included in the Application as Exhibits F2 and F4. Under these agreements Whitpain Township charges East Norriton Township based on Whitpain's rates. East Norriton then pays Whitpain those charges. East Norriton then bills these residents the amounts paid to Whitpain. Aqua is requesting assignment of these contracts and is implementing the rates that these customers are currently charged. The Whitpain Ordinance reflecting these rates is included with this letter.

INFORMATION REQUEST:

Checklist Item No. 22.a. – The Application's Section VIII, Paragraph 45 indicates the service area comprising the requested territory is consistent with East Norriton's service area and complies with the DEP-approved Act 537 Plan and Aqua is not proposing to expand beyond the existing plant footprint. However, the Application's Exhibit A, "Map of Requested Territory Including A Bearing and Angle Description", includes areas designated for other uses (e.g., on-lot disposal, streams/wetlands/detention basins and permanently protected) by the 2006 Plan Update and appears to contain area beyond the existing plant footprint. Please reconcile this apparent conflict or provide a revised requested service territory map with a revised boundary description, compliant with Figure 3-2 of the 2006 Plan Update provided in the Application's Exhibit P1.

RESPONSE:

A Revised Application Exhibit A "Map of Requested Territory Including A Bearing and Angle Description" is included with this letter. The Revised Map excludes areas designated for other uses by the 2006 Plan Update. It includes customer residents of East Norriton Township

located along the Township borders with Plymouth Township and with Whitpain Township. The mains that these border customers are connected to are owned by Plymouth Township and Whitpain Township, respectively. The service laterals within the East Norriton Township rights of way that connect the border residents to the Plymouth and Whitpain Township mains are owned by East Norriton Township. Correspondence between East Norriton Township and Plymouth and Whitpain Townships confirming East Norriton Township's ownership of the laterals within the rights of way is included with this letter.

INFORMATION REQUEST:

Checklist Item No. 22.e. – The Application's Exhibit A indicates APW is proposing a requested service territory beyond the limits of the existing plant footprint. While Page 10 Paragraph 46 of the Application provides web link addresses for the East Norriton Township and Montgomery County Comprehensive Plans, no evidence that the Application is consistent with these plans is provided. Please provide evidence the Application's proposed wastewater service territory is consistent with the East Norriton Township and Montgomery County Comprehensive Plans.

RESPONSE:

Please see the attached letters from East Norriton Township, dated October 9, 2019, and Montgomery County, dated October 9, 2019.

In addition to the foregoing, we have become aware that the Confidential Work Paper Files 13, 14 and 15, in Excel Format, of Gannett Fleming Valuation and Rate Consultants, LLC, included with the Application on July 30, 2019, are incorrect. A Confidential CD with Confidential replacement Files 13, 14 and 15, in Excel Format, is included with this letter. Gannett Fleming considers its Work Paper Files, in Excel Format, to be Confidential and Proprietary.

The Verification of William C. Packer verifying the foregoing and the facts set forth in our letter of August 9, 2019, is attached hereto.

Aqua believes that, with this letter and accompanying documentation, it has complied with the Bureau of Technical Utility Services requests for supplemental information and asks that the Public Utility Commission acknowledge that the Application has been perfected.

Please contact me with any questions about this matter.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By 

Thomas T. Niesen

cc: Certificate of Service (w/encl.)
Alexander R. Stahl, Esquire (via email, w/encl.)
Thomas S. Wyatt, Esquire (via email, w/encl.)

**EAST NORRITON TOWNSHIP LETTER
DATED AUGUST 12, 2019**

RECEIVED

2019 OCT 21 PM 2:29

PA PUC
SECRETARY'S BUREAU
FRONT DESK



EAST NORRITON TOWNSHIP

250 I Stanbridge Street. East Norriton, PA 19401-1616 U.S.A.
610-275-2800 Fax: 610-277-1879
info@eastnorritontwp.org www.eastnorritontwp.org

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Supervisor

Ashley DiPiero

Supervisor

Joseph Gavanus Jr.

Supervisor

Robert R. Hart, Esq.

Township Manager

August 12, 2019

Alexander R. Stahl
Regulatory Counsel
Aqua America Inc
762 W Lancaster Avenue
Bryn Mawr, PA 19010

Re: 66 Pa. C.S. Section 12329 Application Completeness Review
Aqua Pennsylvania Wastewater, Inc
East Norriton Township Wastewater System Acquisition at Docket No. A-2019-3009052

Dear Mr. Stahl,

Regarding East Norriton Township's code determining sewer system rates, please be advised as follows:

1. §162-22.C., regarding volumetric rates for customers served by a shared lateral
We have no customers in this rate category.
2. §162-23.B., regarding an additional charge for certain industrial wastes.
We have no customers in this rate category.

Please let me know if any additional information is required.

Sincerely,

David A. Crist
Director of Finance

WHITPAIN TOWNSHIP RATE ORDINANCE

RECEIVED

OCT 21 2019

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

**WHITPAIN TOWNSHIP
RESOLUTION No. 1273**

**A RESOLUTION ESTABLISHING SANITARY SEWER RATES TO BE
CHARGED COMMENCING APRIL 1, 2019**

WHEREAS, pursuant to §2511 of the Second Class Township Code, Act of May 1, 1933 (P.L. 103, No. 69) as amended, and Chapter 122, §122-15 and §122-40 of the Code of the township of Whitpain, by which authority, the Board of Supervisors are authorized by law to impose a quarterly charge, by Resolution, upon all persons whose property is connected to the Whitpain Township public sanitary sewer system;

NOW, THEREFORE, BE IT RESOLVED and it is hereby **RESOLVED** by the **BOARD OF SUPERVISORS OF WHITPAIN TOWNSHIP** that effective April 1, 2019 the Sewer Rentals for each quarter shall be as follows:

Section 1: Sewer Rentals. Effective April 1, 2019 and thereafter, the quarterly sewer rentals for properties connected to the public sanitary sewer system in Whitpain Township shall be predicated upon usage pursuant to the following Schedule of Sewer Rents:

SCHEDULE OF SEWER RENTS

Use	Quarterly Rate
Residential	\$95 for the first 20,000 gallons with a flat surcharge of \$23.75 thereafter;
Multi-Family/Unit	\$95 per unit for the first 20,000 gallons with a flat surcharge of \$23.75 thereafter;
Multi-Family/Club	\$168 for the first 12,000 gallons and \$8 for each additional 1,000 gallons or any portion thereof;
Commercial	\$168 for the first 12,000 gallons and \$8 for each additional 1,000 gallons or any portion thereof;
Hotel/Motel	\$168 for the first 12,000 gallons and \$8 for each additional 1,000 gallons or any portion thereof;

School

\$168 for the first 12,000 gallons and \$8 for each additional 1,000 gallons or any portion thereof;

Municipal

\$168 for the first 12,000 gallons and \$8 for each additional 1,000 gallons or any portion thereof.


Section Two: Effective Date. The effective date of this Schedule of Sewer Rents shall be April 1, 2019.

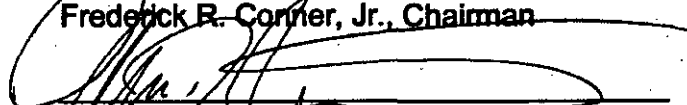
ENACTED and RESOLVED by the **BOARD OF SUPERVISORS OF WHITPAIN TOWNSHIP** this 19th day of February, 2019.


**WHITPAIN TOWNSHIP
BOARD OF SUPERVISORS**

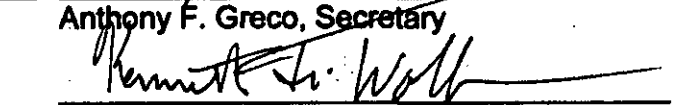
ATTEST:



Roman M. Pronczak, P.E.
Township Manager

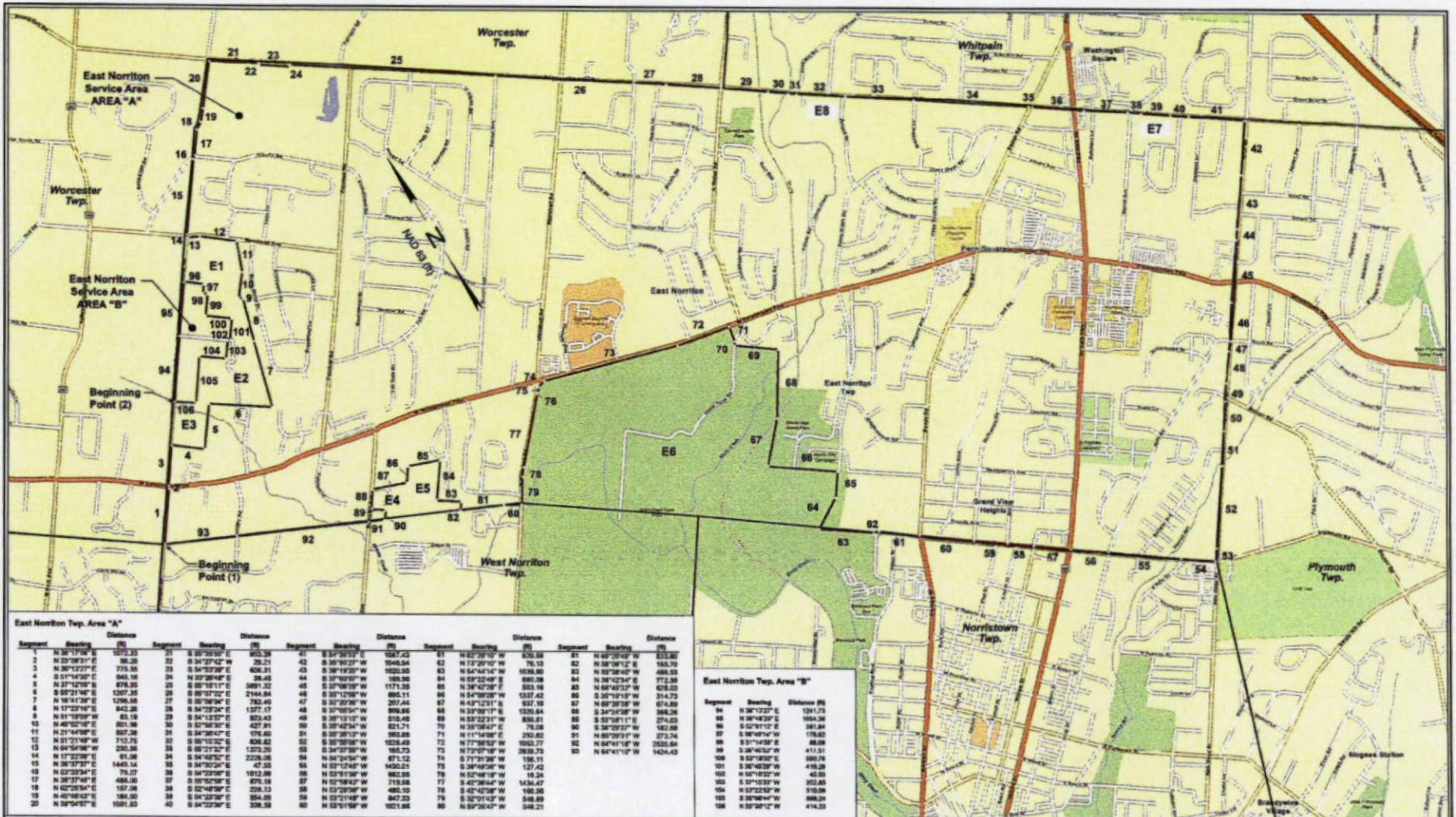

Frederick R. Corner, Jr., Chairman


Adam D. Zucker, Vice-Chairman


Anthony F. Greco, Secretary


Kenneth F. Wollman, Treasurer


Michele Minnick, Assistant Secretary



East Norriton Twp. Area "A"

Segment	Bearing	Distance (ft)	Segment	Bearing	Distance (ft)	Segment	Bearing	Distance (ft)	Segment	Bearing	Distance (ft)
1	N 38°17'06" E	1073.33	21	S 54°39'00" E	675.38	41	S 54°39'00" E	1047.23	61	N 62°20'10" W	630.38
2	N 23°38'31" E	96.28	22	S 34°27'42" W	78.21	42	S 38°30'27" W	1046.64	62	N 73°20'10" W	76.13
3	N 38°17'06" E	775.58	23	S 54°39'00" E	608.31	43	S 38°19'20" W	1020.80	63	S 54°44'14" W	1036.80
4	S 51°14'30" E	945.18	24	N 33°38'48" E	36.45	44	S 37°49'30" W	188.98	64	N 38°12'34" E	772.38
5	N 27°12'09" E	878.35	25	S 88°19'11" E	3489.32	45	S 37°09'38" W	1171.35	65	N 38°42'38" E	803.18
6	S 82°31'40" E	1357.25	26	S 82°31'40" E	2144.64	46	S 37°12'09" W	885.11	66	N 54°46'28" E	5337.42
7	N 18°41'38" E	1296.68	27	S 38°38'04" E	782.40	47	S 32°30'36" W	207.44	67	N 43°12'11" E	837.18
8	N 17°22'16" E	842.28	28	S 64°29'24" E	1377.17	48	S 37°09'34" W	896.86	68	N 33°38'17" E	1320.64
9	N 61°18'00" W	81.18	29	S 41°12'57" E	355.43	49	S 37°11'10" W	216.48	69	N 52°22'11" E	274.63
10	N 49°32'18" E	801.96	30	S 52°36'30" E	427.81	50	S 38°42'34" W	621.71	70	N 38°36'47" E	76.68
11	N 21°44'08" E	887.38	31	S 64°38'47" E	176.80	51	S 38°38'13" W	982.88	71	N 11°14'08" E	282.82
12	N 51°21'48" W	713.73	32	S 88°12'32" E	836.82	52	S 38°38'08" W	1025.49	72	N 77°38'52" W	1023.77
13	N 64°54'08" W	230.56	33	S 88°21'32" E	1372.20	53	S 34°37'38" W	188.73	73	N 73°07'18" W	283.70
14	S 17°23'08" E	81.08	34	S 64°48'32" E	2228.05	54	N 64°34'34" W	871.12	74	S 71°31'38" W	186.11
15	N 38°17'06" E	1448.14	35	S 64°30'26" E	47.56	55	N 52°12'48" W	1432.21	75	S 38°46'28" W	127.42
16	N 52°33'34" E	79.27	36	S 64°22'00" E	1012.00	56	N 52°18'18" W	802.88	76	N 52°48'18" W	18.34
17	N 38°17'06" E	488.28	37	S 54°22'08" E	876.18	57	N 52°18'02" W	715.88	77	S 42°18'04" W	1434.47
18	N 42°48'42" E	188.20	38	S 52°42'58" E	226.13	58	N 52°23'08" W	486.13	78	S 42°42'08" W	188.98
19	N 42°48'42" E	188.20	39	S 54°22'38" E	854.08	59	N 52°21'48" W	847.33	79	S 52°14'12" W	548.89
20	N 38°17'06" E	1601.53	40	S 64°22'38" E	338.58	60	N 52°19'18" W	1021.88	80	N 52°36'47" W	348.21

East Norriton Twp. Area "B"

Segment	Bearing	Distance (ft)	Segment	Bearing	Distance (ft)
81	N 38°12'27" E	1241.73			
82	N 38°14'20" E	1084.38			
83	S 52°31'12" E	381.84			
84	S 38°49'14" W	178.82			
85	S 51°14'58" E	88.88			
86	S 38°46'30" W	411.31			
87	S 52°18'02" E	980.78			
88	S 38°46'28" W	418.28			
89	N 10°12'02" W	43.83			
90	S 37°18'33" W	352.88			
91	N 10°22'02" W	110.88			
92	S 38°38'44" W	888.24			
93	N 52°39'12" E	414.33			



<p>East Norriton Twp. Area "A": 144,888.704 square ft. 3,274.4 Acres 0.272 square miles</p> <p>(1) Beginning (2)00: PAIPII Coordinates North: 293,384.47 East: 1,102,071.17. It is a point along the intersection of East Norriton, West Norriton, Local Providence and Worcester Twp. and Norristown, respectively to the North, South, East and West. Refer to the above plat for bearings and distances.</p>	<p>East Norriton Twp. Area "B": 1,377,188 square ft. 31.4 Acres 0.644 square miles</p> <p>(1) Beginning (2)00: PAIPII Coordinates North: 293,384.47 East: 1,102,071.17. It is a point along the north-south line of East Norriton, approximately 750 feet north of the intersection of East Norriton, West Norriton, Local Providence and Worcester Twp. and Norristown, respectively to the North, South, East and West. Refer to the above plat for bearings and distances.</p>
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<p>SERVICE AREA TERRITORY</p> <p>Total East Norriton Twp. Service Area: 146,265.892 square ft. 3,406.2 Acres 0.274 square miles</p> <p>EXCEPTIONS</p> <p>81: BALLARD WELPPE PARK, PARCELS 122000000000 82: "Y" PARCELS 433000141-340 83: "Y" PARCELS 433000000000 84: BURBANK ESTATES, 100700000 PARCELS 85: TWP. PARCELS 433000150014 86: PARKER PARK, PARCELS 433000000000 87: TWP. PARCELS 433000000000 88: "Y" PARCELS 433000000000</p>	<p>Legend</p> <p> Requested Territory</p>	<p>SCALE IN FEET</p> <p>0 400 800 1,600</p>
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**REVISED EXHIBIT A SERVICE TERRITORY MAP
AND DESCRIPTION**

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OCT 21 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**CORRESPONDENCE OF EAST NORRITON
TOWNSHIP AND PLYMOUTH TOWNSHIP RE
OWNERSHIP OF SERVICE LATERALS**

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



EAST NORRITON TOWNSHIP

250 I Stanbridge Street. East Norriton, PA I 9401-1616 U.S.A.
610-275-2800 Fax: 610-277-1879
info@eastnorritontwp.org www.eastnorritontwp.org

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Supervisor
Robert R. Hart, Esq.
Township Manager

September 17, 2019

Karen Weiss, Township Manager
Plymouth Township
700 Belvoir Road
Plymouth Meeting PA 19462

RE: East Norriton Ownership and Maintenance of Sewer Laterals in East Norriton's Right of Way

Dear Karen,

I am writing you regarding the ownership of certain sewer service laterals in the right of way of East Norriton Township ("East Norriton"). Currently, per an agreement dated August 13, 1991, between East Norriton Township and Plymouth Township ("Plymouth"), East Norriton and Plymouth have agreed that certain properties in their respective townships will send flows through the mains owned by the other township. Additionally, due to the existence of certain mains, certain customers in East Norriton have connected into mains owned by Plymouth.

The mains that these East Norriton residents are connected to are owned by Plymouth, but are in East Norriton's right of way. It is East Norriton's position that it owns the portion of the sewer lateral in the public rights of way within its municipal boundary, which includes that portion of the sewer laterals in the rights of way for these East Norriton customers that are connected to the Plymouth owned main.

East Norriton is selling its sewer assets to Aqua Pennsylvania Wastewater, Inc. ("Aqua"), which includes these sewer laterals in the rights of way of East Norriton. Per the August 13, 1991 agreement East Norriton bills these customers connected to the Plymouth mains at East Norriton rates. Upon closing of the transaction, Aqua will own and perform all repairs, operations and maintenance relating to the sewer assets within East Norriton and Aqua will similarly own and perform such duties concerning the sewer laterals of the East Norriton residents in the rights of way connecting to the Plymouth owned mains.

Aqua will coordinate any repairs or maintenance with East Norriton and Plymouth following the closing of the transaction. Please confirm that the above is consistent with your understanding.

If you have any questions regarding this letter, please contact me at 610-275-2800.

Sincerely,


Robert R. Hart, Esq.
Township Manager

From: Robert Hart <rhart@eastnorritontwp.org>

Date: September 27, 2019 at 11:00:58 AM EDT

To: "SHEARERS@pfm.com" <SHEARERS@pfm.com>, "thomas.wyatt@obermayer.com" <thomas.wyatt@obermayer.com>, David Crist <dcrist@eastnorritontwp.org>

Subject: Fwd: letter

Sent from my iPhone

Begin forwarded message:

From: "Weiss, Karen" <KWeiss@plymouthtownship.org>

Date: September 27, 2019 at 10:47:31 AM EDT

To: Robert Hart <rhart@eastnorritontwp.org>

Cc: Margaret Thomas <mthomas@eastnorritontwp.org>

Subject: FW: letter

Good morning Bob,

In response to the attached letter, I am confirming that Plymouth Township does not own any sewer laterals connected to its mains, whether in a street right-of-way (or on private property).

Regards,
Karen

Karen B. Weiss
Plymouth Township Manager
700 Belvoir Road
Plymouth Meeting, PA 19462
Ph. 610-233-0608
Fax 610-277-1452
kweiss@plymouthtownship.org

**CORRESPONDENCE OF EAST NORRITON
TOWNSHIP AND WHITPAIN TOWNSHIP RE
OWNERSHIP OF SERVICE LATERALS**

RECEIVED

OCT 21 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



EAST NORRITON TOWNSHIP

250 I Stanbridge Street, East Norriton, PA 19401-1616 U.S.A.
610-275-2800 Fax: 610-277-1879
info@eastnorritontwp.org www.eastnorritontwp.org

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Joseph Gavanus Jr.
Supervisor
Robert R. Hart, Esq.
Township Manager

October 8, 2019

Roman Pronczak, Township Manager
Whitpain Township
960 Wentz Road
Blue Bell PA 19422

RE: East Norriton Ownership and Maintenance of Sewer Laterals in East Norriton's Right of Way

Dear Roman,

I am writing you regarding the ownership of certain sewer service laterals in the right of way of East Norriton Township ("East Norriton"). Currently, per an agreement dated July 18, 1994, between East Norriton and Whitpain Township ("Whitpain") and John DiSanto, and an agreement dated September 9, 2007 between East Norriton, Whitpain, and the Automobile Dealers Association of Greater Philadelphia, East Norriton and Whitpain have agreed that certain properties in East Norriton will send flows through the mains owned by Whitpain.

The mains that these East Norriton residents are connected to are owned by Whitpain, but the laterals and pipes that connect to Whitpain's mains originate through East Norriton's portion of the right of way. It is East Norriton's position that it owns the portion of the sewer lateral in the public rights of way within its municipal boundary, which includes that portion of the sewer laterals in the rights of way for these East Norriton customers that are connected to the Whitpain owned main.

East Norriton is selling its sewer assets to Aqua Pennsylvania Wastewater, Inc. ("Aqua"), which includes these sewer laterals in the rights of way of East Norriton. Per the July 18, 1994 agreement and the September 9, 2007 agreement, Whitpain bills East Norriton, and East Norriton pays Whitpain, sewer rentals related to these properties. East Norriton then bills its residents the same amount it was billed by Whitpain. Upon closing of the transaction, Aqua will own and perform all repairs, operations and maintenance relating to the sewer assets within East Norriton and Aqua will similarly own and perform such duties concerning the sewer laterals of the East Norriton residents in the rights of way connecting to the Whitpain owned mains.

Aqua will coordinate any repairs or maintenance with East Norriton and Whitpain following the closing of the transaction. Please confirm that the above is consistent with your understanding.

If you have any questions regarding this letter, please contact me at 610-275-2800 or rhart@eastnorritontwp.org.

Sincerely,


Robert R. Hart, Esq.
Township Manager

From: Roman Pronczak <rpronczak@whitpaintownship.org>

Date: October 9, 2019 at 9:15:55 AM EDT

To: Robert Hart <rhart@eastnorringtonwp.org>, Margaret Thomas <mthomas@eastnorringtonwp.org>

Cc: Jim Blanch <jblanch@whitpaintownship.org>, Tom Farzetta <tfarzetta@whitpaintownship.org>, Gus Belmont <gbelmont@whitpaintownship.org>, David Mrochko <dmrochko@whitpaintownship.org>, Bob Iannozzi <riannozzi@djschellbartle.com>

Subject: RE: East Norriton-Whitpain Customer Laterals

Good morning Bob,

This is to confirm that your understanding of the ownership and maintenance responsibilities of sewer laterals serving properties in East Norriton Township that connect to the Whitpain Township sewer system described in your letter dated October 8, 2019 is consistent with our understanding. Please let me know if you require any additional information.

Take care,

Roman

Roman M. Pronczak
Whitpain Township Manager
960 Wentz Road
Blue Bell, PA 19422
(610) 277 - 2400

rpronczak@whitpaintownship.org

**EAST NORRITON TOWNSHIP LETTER
DATED OCTOBER 9, 2019**

RECEIVED

OCT 21 2019

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU



EAST NORRITON TOWNSHIP

250 I Stanbridge Street, East Norriton, PA 19401-1616 U.S.A.
610-275-2800 Fax: 610-277-1879
info@eastnorritontwp.org www.eastnorritontwp.org

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Ashley DiPiero

Supervisor

Joseph Gavanus Jr.

Supervisor

Robert R. Hart, Esq.

Township Manager

October 9, 2019

Thomas F. Rafferty
Director, Business Development
Aqua America, Inc
762 W. Lancaster Avenue
Bryn Mawr, PA 19010

Dear Mr. Rafferty:

Regarding Aqua Pennsylvania Wastewater Inc's application to serve portions of East Norriton Township, Montgomery County, please be advised that Aqua's application is consistent with the applicable comprehensive plans and zoning ordinances of East Norriton Township.

Sincerely,

Robert R. Hart, Esq
Township Manager

**MONTGOMERY COUNTY LETTER
DATED OCTOBER 9, 2019**

RECEIVED

OCT 21 2019

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

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BOARD OF COMMISSIONERS**

VALERIE A. ARKOOSH, MD, MPH, CHAIR
KENNETH E. LAWRENCE, JR., VICE CHAIR
JOSEPH C. GALE, COMMISSIONER



**MONTGOMERY COUNTY
PLANNING COMMISSION**

MONTGOMERY COUNTY COURTHOUSE • PO BOX 311
NORRISTOWN, PA 19404-0311
610-278-3722
FAX: 610-278-3941 • TDD: 610-631-1211
WWW.MONTCOPA.ORG

JODY L. HOLTON, AICP
EXECUTIVE DIRECTOR

October 9, 2019

Mr. Robert R Hart, - Township Manager
East Norriton Township
2501 Stanbridge Street
East Norriton, PA 19401- 1616

Re: Aqua Pennsylvania, Inc.
application to serve
portions of East Norriton Township

Dear Mr. Hart:

The planning Commission understands that Aqua Pennsylvania, Inc. (Aqua) is submitting an application with the Pennsylvania Public Utility Commission (PUC) to approve the right to offer, render, furnish, or provide wastewater service to the public in portions of East Norriton Township, Montgomery County.

As part of the application process, the PUC requested that Aqua seek the County's determination on consistency of the application with County land use planning. Below is our response.

1. Is there an adopted comprehensive plan for the township involved? It is our understanding that East Norriton Township's comprehensive plan was last updated in 2008.
2. Is there an adopted county comprehensive plan? Yes, adopted in 2015.
3. Is there an adopted multi-municipal or multi-county comprehensive plan? No.
4. Is there an adopted County or municipal zoning ordinance or joint municipal zoning ordinance? East Norriton Township maintains its own zoning ordinance. There is no County or joint municipal zoning ordinance.
5. Is the proposed project consistent with these comprehensive plans and/or zoning ordinances? It is consistent with the County Comprehensive Plan.

For any questions regarding this letter, please contact me at (610)-278-3733 or dshaw@montcopa.org.

Sincerely,

Drew Shaw, AICP
Environmental Planning Section Chief
Montgomery County Planning Commission

**VERIFICATION OF
WILLIAM C. PACKER**

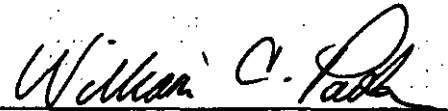
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OCT 21 2019

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

VERIFICATION

I, William C. Packer, Vice President - Controller of Aqua Pennsylvania Wastewater, Inc., hereby state that the facts set forth in the letters of Counsel of Aqua Pennsylvania Wastewater, Inc., dated August 9, 2019 and October 21, 2019, addressing information requests of the Bureau of Technical Utility Services in the matter at PaPUC Docket No. A-2019-3009052, 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).



William C. Packer
William C. Packer
Vice President - Controller
Aqua Pennsylvania Wastewater, Inc.

Dated: October 21, 2019

CERTIFICATE OF SERVICE

I hereby certify that I have this 21st day of October, 2019, served a true and correct copy of the foregoing Letter and Additional Information, including Confidential and Proprietary CD with Confidential and Proprietary Gannett Fleming Replacement Files, upon the persons and in the manner set forth below:

HAND DELIVERY

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Erika McLain, Prosecutor
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Thomas T. Niesen
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