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April 27, 2020

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Implementation of Chapter 32 of the Public Utility Code Re: Pittsburgh Water
and Sewer Authority; Docket Nos. M-2018-2640802 and M-2018-2640803

Petition of the Pittsburgh Water and Sewer Authority for Approval of Its Long-Term
Infrastructure Improvement Plan; Docket Nos. P-2018-3005037 and P-2018-3005039

Dear Secretary Chiavetta:

Enclosed for electronic filing please find The Pittsburgh Water and Sewer Authority's ("PWSA") Amended Long-Term Infrastructure Improvement Plan ("Amended LTIIP"), which includes PWSA's Comprehensive Lead Infrastructure Plan (attached to the Amended LTIIP as "Amended Appendix C"). The Amended LTIIP and Lead Infrastructure Plan are being submitted pursuant to the Commission's March 26, 2020 Final Order ("Final Order") with regard to the above-referenced matter.¹

PWSA's initial LTIIP was filed on September 28, 2018. A revised LTIIP was submitted for the record on August 21, 2019 incorporating agreed-to revisions set forth in the Joint Petition for Partial Settlement that was filed with the Commission on September 13, 2019. The enclosed Amended LTIIP includes the revisions from the August 21, 2019 version of the LTIIP and has been modified to reflect current information. The Amended LTIIP includes an Amended Figure 5-1 (originally included as part of Appendix A), an Amended Table 2-6 (originally included as part of Appendix B) and, as noted, an Amended Appendix C. Appendices D and E, as well as Figures 1-1 and 1-2 (encompassing the remainder of Appendix A) and Tables 2-4, 2-5, 3-2, 3-6, 4-1, 4-2, and 7-2 (encompassing the remainder of Appendix B) have not been modified, and are, therefore, not included in this filing.

¹ In further compliance with the Final Order, PWSA is also filing under separate cover: (1) a Revised Compliance Plan; and, (2) Tariff Supplement No. 3 to the Water and Wastewater Tariffs.

Included as Amended Appendix C with the Amended LTIIP is PWSA's Comprehensive Lead Infrastructure Plan. PWSA appreciates the Commission's efforts to compile a comprehensive document that sets forth the entirety of PWSA's lead infrastructure plan in Appendix A of the Final Order and, for the most part, accepts the Commission's compilation. PWSA's enclosed Lead Infrastructure Plan (Amended Appendix C) does, however, reflect a few modifications to Appendix A of the Final Order, as explained below.

1. Appendix A Page 7 (Section G.2.a.vii) of the Final Order reflected that PWSA committed in the proceeding to complete a two-year project to add information about its Small Diameter Water Mains to its Geographic Information System ("GIS") database. Amended Appendix C (PWSA's Lead Infrastructure Plan) reflects the fact that while PWSA is still planning to update its GIS database, as detailed in PWSA's testimony, it has not begun that process.
2. With regard to the Community Environmental Project, PWSA clarified in footnote 3 of the Amended Appendix C (PWSA's Lead Infrastructure Plan) (Page 8) that in December 2019 the Pennsylvania Department of Environmental Protection approved increasing the eligibility threshold for this Program from households with income levels below 250 percent of the federal poverty level ("FPL"), as adjusted annually, to households with income levels below 300 percent of the FPL, as adjusted annually.
3. Paragraph I.5. of Appendix A of the Final Order states that PWSA estimates that the average cost of direct construction work to replace private side lead service lines by a customer's private contractor is \$5,500. Amended Appendix C (PWSA's Lead Infrastructure Plan) (Page 12, Section I.5) corrects the statement to reflect PWSA's testimony that it estimates the average cost of direct construction work to replace a private side lead service line by a customer's private contractor to be about 75% of the direct construction cost that PWSA averages (\$5,500).
4. The Commission modified the Partial Settlement in this proceeding to include subsections J.2.v. and vi. in Appendix A of the Final Order. Amended Appendix C (PWSA's Lead Infrastructure Plan) explains in footnotes 8 and 9 (Page 13) that these subsections are held in abeyance due to the pending Petitions for Reconsideration, Clarification and/or Amendment filed by PWSA and Pittsburgh UNITED on April 10, 2020.

If you have any questions regarding PWSA's Amended LTIIP or Lead Infrastructure Plan, please contact me. Additionally, please contact me if you want a redlined version of PWSA's Amended LTIIP.

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

Sincerely,



Deanne M. O'Dell

Enclosure

cc: Hon. Conrad Johnson w/enc.(email only)
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John Van Zant w/ enc. (via email only to jvanzant@pa.gov)
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Certificate of Service w/enc.

CERTIFICATE OF SERVICE

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

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Dated: April 27, 2020



Deanne M. O'Dell, Esq.

PITTSBURGH WATER & SEWER AUTHORITY

5-YEAR
LONG-TERM INFRASTRUCTURE
IMPROVEMENT PLAN

April 27, 2020

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LIST OF ACRONYMS & ABBREVIATIONS

AACE	Association for the Advancement of Cost Engineering
AAOP	Annual Asset Optimization Plan
ACHD	Allegheny County Health Department
ACO	Administrative Consent Order
AL	Lead & Copper Rule Action Limit
ALCOSAN	Allegheny County Sanitary Authority
Authority	The Pittsburgh Water and Sewer Authority (also, PWSA)
BBP	Blood Borne Pathogens
BMP	Best Management Practice
BODR	Basis Of Design Report
CCTV	Closed Circuit Television
Ch.	Chapter
CIP	Capital Improvement Plan; also, Capital Improvement Program
CIPP	Cured-in-place Pipe
City	The City of Pittsburgh
CMI	Compliance Management International
CMMS	Computer Monitoring Maintenance System
CMP	Corrugated Metal Pipe
CoF	Consequence of Failure
COA	Consent Order and Agreement
Commission	Public Utilities Commission
CSO	Combined Sewer Overflow
DOMI	Department Of Mobility and Infrastructure of the City of Pittsburgh
DSIC	Distribution System Improvement Charge
EOC	Equal Opportunity Contract
FIO	Final Implementation Order
FY	Fiscal Year
GI	Green Infrastructure
GIS	Geographic Information System

LIST OF ACRONYMS & ABBREVIATIONS

gpm	Gallons Per Minute
HDP	High Density Polyethylene
IDIQ	Indefinite Delivery/Indefinite Quantity
JSA	Job Safety Analysis
LF	Linear Feet
LOS	Level Of Service
LSL	Lead Service Lines
LSLR	Lead Service Line Replacement
LTIIP	Long Term Infrastructure Improvement Plan
MBE	Minority owned Business Enterprise
MOU	Memorandum of Understanding
MGD	Million Gallons per Day
mg/L	Milligrams per Liter
NASSCO	National Association of Sewer Service Companies
NMCs	Nine Minimum Control Measures
NPDES	National Pollutant Discharge Elimination System
OSHA	Occupational Safety & Health Act
P3	Public Private Partnership
PA (or Pa)	Pennsylvania
PACP	Pipeline Assessment Certification Program
PADEP	Pennsylvania Department of Environmental Protection
PAYGO	Pay As You Go
PAWC	Pennsylvania American Water Company
PCCP	Pre-stressed Concrete Cylinder Pipe
PennDOT	Pennsylvania Department of Transportation
PENNVEST	Pennsylvania Infrastructure Investment Authority
PMP	Program Management Plan
PPA	PWSA Project Audit
ppb	Parts Per Billion
PPE	Personal Protective Equipment

LIST OF ACRONYMS & ABBREVIATIONS

psi	Pounds per Square Inch
PVC	Polyvinyl Chloride
PWS	Public Water Suppliers
PWSA	Pittsburgh Water & Sewer Authority (also, Authority)
RCP	Reinforced Concrete Pipe
RFP	Request For Proposal
ROW	Right Of Way
SDWMR	Small Diameter Water Main Replacement
SIP	Safety Improvement Plan
SME	Subject Material Expert
SOW	Scope of Work
SRS	Source Reduction Study
SSO	Sanitary Sewer Overflow
TDH	Total Dynamic Head
TIO	Tentative Implementation Order
TM	Technical Design Memorandum
USEPA	United States Environmental Protection Agency
VCP	Vitrified Clay Pipe
WBE	Women-owned Business Enterprise
WIFIA	Water Infrastructure Finance and Innovation Act of 2014
WWTF	Wastewater Treatment Facility

1 INTRODUCTION

1.1 Regulatory Background

1.1.1 Overview

On December 21, 2017, Pennsylvania Governor Wolf signed Act 65 of 2017 (Act) into law amending the Pennsylvania (PA or Pa) Public Utility Code which, among other things, added a new Chapter 32 (Sections 3201 – 3209) addressing the Public Utility Commission’s (Commission) jurisdiction over the provision of utility water, wastewater, and stormwater service by entities created by Pennsylvania cities of the second class under the Municipality Authorities Act. As the City of Pittsburgh (City) is the only city of the second class in the Commonwealth, the Commission now has jurisdiction over the Pittsburgh Water and Sewer Authority (Authority). The Authority is the first municipal authority to be regulated by the Commission.

On January 18, 2018, the Commission issued a Tentative Implementation Order (TIO) which included methods by which the Commission and affected entities may carry out the tariff approval, ratemaking, compliance plan and assessment provision of Act 65. As part of the tariff approval process, the Authority is required to submit a Compliance Plan to the Commission which addresses how it will achieve full regulatory compliance including provisions to bring the Authority’s existing information technology, accounting, billing, collection and other operating systems and procedures into compliance with the requirements applicable to jurisdictional water and wastewater utilities.

On July 2, 2018, the Authority filed a tariff (rate request package) with the Commission and a final determination was approved in early 2019. PWSA filed a second tariff request on March 6, 2020. Both tariffs have been based upon a comprehensive review of the Authority’s operational and infrastructure needs. PWSA’s Long-Term Infrastructure Improvement Plan (LTIIP) (66 Pa C.S. §3202 (6) documents a multiyear investment program which is limited to the eligible projects. Note that PWSA has other capital investment needs for the water supply system that are not LTIIP eligible.

The Commission typically requires that a LTIIP be submitted to support a DSIC. In our July 2, 2018 rate request, the Authority elected not to request a separate DSIC and proposed to fund the short-term water distribution system and sanitary sewer collection system capital improvements through its current tariffs. However, the Authority has reconsidered the need for a DSIC as a result of our essential facilities improvement and has prepared this LTIIP to outline its proposed program of renewal and rehabilitation.

LTIIP requirements are identified in PA code Chapter 121 §121.3 as follows:

1. Identification of types and age of eligible property owned and operated by the utility
2. An initial schedule for planned repair and replacement of eligible property
3. A general description of location of eligible property
4. A reasonable estimate of quantity of eligible property to be improved or repaired
5. Projected annual expenditures and means to finance the expenditures

6. A description of the manner by which infrastructure replacements will be accelerated and how repair, improvement or replacement will ensure and maintain adequate, efficient, safe, reliable and reasonable service to customers
7. A workforce management and training program designed to ensure that the utility will have access to a qualified workforce to perform work in a cost-effective, safe and reliable manner
8. A description of the utility's outreach and coordination activities with other utilities, Department of Transportation and local governments regarding the planned maintenance/construction projects and roadways that may be impacted by the LTIIIP

Financing as listed in Item #5 above is not specifically addressed in this LTIIIP. Currently planned LTIIIP improvements will be funded through both current rates and future rate increases, and financed through revenue bonds, a capital line of credit, pay-as-you-go (PAYGO) funding, and PennVest low interest loans. The Authority is exploring the federal funded program called the Water Infrastructure Finance and Innovation Act of 2014 (WIFIA) to help finance certain planned improvements. The WIFIA program offers low, fixed interest rates and flexible financial terms. The Authority intends to utilize a mix of all funding options to invest in the planned improvements at the lowest possible ratepayer cost. The Authority also intends to explore the potential use of public-private partnerships in the future to lower the capital cost burden to our ratepayers.

LTIIIP "Eligible property" is defined in the code as property that is part of a distribution system and eligible for repair, improvement and replacement as defined in 66 PA C.S. § 1351, as follows:

"(3) For water utilities, eligible property shall include:

- (i) Utility service lines, meters and hydrants installed as in-kind replacements for customers.*
- (ii) Mains and valves installed as replacements for existing facilities that have worn out, are in deteriorated condition or are required to be upgraded to meet under 52 PA Code Ch. 65 (relating to water service).*
- (iii) Main extensions installed to eliminate dead ends and to implement solutions to regional water supply problems that present a significant health and safety concern for customers currently receiving service from the water utility.*
- (iv) Main cleaning and relining projects.*
- (v) Unreimbursed costs related to highway relocation projects where a water utility must relocate its facilities.*
- (vi) Other related capitalized costs."*

And,

"(4) For wastewater utilities, eligible property shall include:

- (i) Collection sewers, collecting mains and service laterals, including sewer taps, curb stops and lateral cleanouts installed as in-kind replacements for customers.*

(ii) Collection mains and valves for gravity and pressure systems and related facilities such as manholes, grinder pumps, air and vacuum release chambers, cleanouts, main line flow meters, valve vaults and lift stations installed as replacements or upgrades for existing facilities that have worn out, are in deteriorated condition or are required to be upgraded by law, regulation or order.

(iii) Collection main extensions installed to implement solutions to wastewater problems that present a significant health and safety concern for customers currently receiving service from the wastewater utility.

(iv) Collection main rehabilitation including inflow and infiltration projects.

(v) Unreimbursed costs related to highway relocation projects where a wastewater utility must relocate its facilities.

(vi) Other related capitalized costs.”

In general, “vertical” assets such as treatment plants, storage facilities, pump stations, etc. are not considered eligible property under the DCIS program. For the purposes of this LTIP, the term “sewers” refers to the sewers under the responsibility of the Authority which include separate sanitary sewers and “combined sewers” which convey sanitary sewage and precipitation diverted to the sewer system.

1.1.2 PUC LTIP Requirements

PUC requested that PWSA provide the following information in its LTIP:

- Details on how the Authority intends to replace or upgrade targeted eligible property, how aging infrastructure replacement will be accelerated, and how that activity will improve reliability and safety;
- Any metrics that the Authority uses to trace and evaluate the effectiveness of infrastructure improvements, e.g., lost or unaccounted for water, main breaks, or non-revenue water;
- Detail on how the programs and property eligible for LTIP consideration were determined and targeted, e.g., a risk-based approach, age, material type, lost or unaccounted for water, non-revenue water, regulatory directive, or audit findings.
- A schedule for eligible property repair and replacement by class and category for each year the LTIP will remain in effect;
- A projection of annual capital expenses to ensure that the LTIP is cost-effective;
- A description of its workforce management and training program; and,
- A description of any outreach and coordination with other utilities, Pennsylvania Department of Transportation (PennDOT), and local governments on planned maintenance or construction projects.

In addition to the LTIP, the TIO states that the Commission will request that the Authority provide it with an Annual Asset Optimization Plan (AAOP) which will include expenditure information for completed LTIP work for the reporting year and the projected year. Pursuant to PUC Regulations,

PWSA's AAOP will be filed annually with the Commission 60 days after the 12 months of its LTIP has expired.

This LTIP reflects asset and project data for water system distribution services and sewer services separately. For the purpose of this LTIP, the three major categories of infrastructure projects addressed are Water, Sewer, and Water/Sewer (Hybrid). Hybrid projects are those which contain elements of both water and sewer which are not easily separable from a cost standpoint. In the next few years, the Authority intends to file a LTIP which will also include stormwater projects.

1.2 Pittsburgh Water and Sewer Authority History and System Overview

The Authority was formed by the City to oversee a significant capital improvement program focused on the City of Pittsburgh water treatment and distribution systems to meet various requirements mandated by Federal and State regulations pertaining to safe drinking water. The Authority was formed under the provisions of the Pennsylvania Municipality Authorities Act, 53 Pa. C.S.A. §5601 et. seq. The Authority's Articles of Incorporation were originally approved on February 17, 1984, by the Commonwealth of Pennsylvania. Pursuant to a Lease and Management Agreement dated March 29, 1984, between the Authority and the City, the water and sewer system was leased to the Authority. Under the Lease and Management Agreement, the Authority was authorized to operate and maintain the water and sewer systems, construct all necessary improvements, establish and collect rates and charges for its service, and finance its operations and improvements through revenue collections and sale of bonds and notes payable solely from the Authority's revenues. The Authority appointed and designated the City as the Authority's agent to manage, operate, and maintain the water and sewer systems for the term of the lease, subject to the general supervision, direction, and the control of the Authority. The City provided the services necessary to operate the water and sewer systems to the Authority with the Authority reimbursing the City for all expenses actually incurred and expended by the City.

The Capital Lease Agreement and Cooperation Agreement, each between the Authority and City, as authorized in Resolution No. 47 of 1995, terminated the aforementioned Lease and Management Agreement. The Cooperation Agreement provided that the City render certain services to the Authority as set forth in the agreement and provided the basis of payment for such services to be rendered by the City. As of January 1, 1995, all positions in the City Water Department and certain positions in the Water and Sewer Division of the Department of Engineering and Construction were eliminated from the City's budget and similar positions were created and filled by the Authority. The Authority absorbed the existing City water department staff at that time, and became the sole operator of the sewer system in 1999.

In 2008, the Commonwealth approved an Amendment to the Articles of Incorporation as adopted by the City and the Authority to extend its term of existence to 2045 in order to ensure that its term covers the duration of certain bond obligations. Again, in 2020, the Commonwealth approved an amendment to the Article of Incorporation as adopted by the City and the Authority to further extend its term of existence to March 19, 2070.

Under the terms of the Capital Lease Agreement, the Authority will own the water and sewer systems on September 1, 2025 upon payment of \$1.00. The Authority is currently negotiating an Agreement to operate and maintain the City's storm sewer system as well. The Authority is in the final stages of *Pittsburgh Water & Sewer Authority Long-Term Infrastructure Improvement Plan I* April 27, 2020

negotiating a Memorandum of Agreement (MOA) for management of stormwater system assets in the City.

1.2.1 Water System Overview

The Authority, through its water supply and distribution system, provides water service to more than 300,000 people throughout the City and surrounding areas (see Figure 1-1 in Appendix A), which is estimated to swell to over 500,000 persons including the business workforce during working hours. The system consists of a 117 million gallons per day (MGD) rapid sand type water treatment plant, one 26 MGD microfiltration water treatment plant, approximately 964 miles of mains, 24,900 valves, and 7,450 fire hydrants (not including private), one raw water pump station located along the Allegheny River, two finished water pump stations, eight distribution pump stations, three covered finished water reservoirs, one uncovered source water reservoir, and ten distribution storage tanks/reservoirs. The total storage capacity of the reservoirs and the tanks is approximately 455 million gallons when fully operational. The useable storage capacity within the reservoir and tank system provides adequate volume and pressure and is sufficient to provide storage equivalent to approximately two days of normal water usage, at 65 to about 70 mgd. The average day demand for 2015, 2016, and 2017 was 64.5 MGD, 64.7 MGD, and 69.7 MGD, respectively. The maximum day demand for 2015, 2016, and 2017 was 80.6 MGD, 94.4 MGD, and 93.5 MGD, respectively.

The sole source of water for the water system is the Allegheny River. The Pennsylvania Department of Environmental Resources, now the Department of Environmental Protection (PADEP), issued a 50-year Water Allocation Permit to the Authority in March 1989, which allows for water withdrawal of up to 100 MGD from the river. The PADEP has advised the Authority that the permitted allocation would be re-evaluated in the future if the Authority's demand increases as a result of growth within the City or through the sale of water to surrounding municipalities.

The Authority's water system currently has over 80,000 service line connections from residential, commercial, industrial, and public customers for potable water and water for fire protection within the geographic boundaries of the City.

In addition to providing water to the City of Pittsburgh, the Authority also owns and operates the water system for the City of Millvale and provides bulk water to the town of Reserve and Fox Chapel. In addition, through interconnections with other systems, the Authority provides water for supply and/or emergency use to several adjacent municipalities: Blawnox, portions of the Pennsylvania American Water Company (PAWC) system, and intermittent provisions to a number of other neighboring communities.

The PAWC supplies water to approximately 27,000 customers in the southern and western sections of the City (the Authority provides sewer conveyance to these customers). The City entered an arrangement (City Ordinance No. 675; "South Hills Water Subsidy" Agreement December 28, 1973) with PAWC that offsets PAWC's water rates for these City customers. The subsidy supports PAWC water charges for Pittsburghers served by PAWC, so the customers' out-of-pocket water rates match the Authority's rates. This Subsidy Agreement ceased its existence in January 2020, based upon the agreement's terms that it becomes null and void upon reaching water cost parity between the two water companies that each serve sections of the City. PWSA's water tariff approval from the PUC in early 2019 resulted in water cost parity being reached.

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Two additional small areas, one in the eastern part and the other in the western end of the City, are served by the Wilkinsburg-Penn Joint Water Authority and the West View Water Authority, respectively. In each of these areas, the distribution system elements (waterlines, valves, hydrants, etc.) are owned and maintained by the respective independent water purveyor.

In April 2016, the Authority received an Administrative Order from PADEP for violations under the Pennsylvania Safe Drinking Water Act and regulations related to a modification of corrosion control treatment chemical in 2014. The Authority reinstituted the original corrosion control chemical in early 2016 and is fully cooperating with PADEP and the components of the Order. The Authority began a corrosion control study in 2017 to further improve lead and copper corrosion control, which ultimately became a regulatory mandate documented in a November 2017 Amended Consent Order (ACO). The study recommended an Orthophosphate treatment system which was installed and became operational in April 2019. The lead abatement issue is discussed in more detail in Section 2 of this LTIIP.

1.2.2 Sewer System Overview

The Authority's sewer collection system is comprised of a network of approximately 1,213 miles of sanitary, storm, and combined sewers (see Figure 1-2 in Appendix A). The system includes 29,000 manholes (which includes flow dividers and diversion chambers), approximately 30,000 inlets (which includes catch basins and storm inlets), 38 combined sewer overflow (CSO) outfalls, 185 storm sewer outfalls, four wastewater pump stations, and ancillary facilities. Approximately 77% of the sewer system is combined sewers, designed so that during wet weather events, a portion of the collected stormwater and diluted wastewater that exceeds the Allegheny County Sanitary Authority (ALCOSAN) conveyance and treatment capacity is discharged into natural watercourses through 98 CSO diversion chambers. Approximately 23% of the sewer system consists of separate sewers that are dedicated separate sanitary and storm sewer pipelines. The Authority's combined sewer system conveys wastewater collected from 24 neighboring suburban municipalities and sewage generated within the City boundaries to the ALCOSAN interceptors. These conveyance pipes are located along the rivers and tributaries which deliver the flow to ALCOSAN's wastewater treatment facility (WWTF) for treatment prior to discharge into the Ohio River. The ALCOSAN WWTF is operating under the National Pollutant Discharge Elimination System (NPDES) under Permit No. 0025984. In total, the ALCOSAN WWTF receives wastewater flows from 83 municipalities and authorities.

The 24 neighboring municipalities' sewer system connections were established pursuant to agreements with the City to convey their wastewater to the ALCOSAN WWTF. Many of these municipal agreements date back to the early 20th Century and do not provide for cost sharing of sewer system maintenance and reconstruction. Neither the City of Pittsburgh nor the PWSA have imposed any of these agreements' conditions relative to payments for sewer system maintenance, reconstruction or repair.

The sewer system has adequate capacity to convey dry weather wastewater flows; however, during wet weather events, the PWSA sewerage conveyance system often exceeds its capacity and the capacity of the ALCOSAN conveyance system, which results in overflows, bypassing, and flooding.

In 1994, the United States Environmental Protection Agency (USEPA) had adopted regulations regarding overflows from combined sewer outfalls during events that result in the discharge of untreated sanitary sewage into receiving waters. The USEPA regulations require owners of any sewer system having CSOs to acquire NPDES discharge permits for each overflow site. In January 1997, the owners of these

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systems were required to implement the USEPA's "Nine Minimum Control Measures" (NMCs). The NMCs define the basic steps for maintaining the combined sewer system in proper operational order and identifying potential areas requiring updates and repairs.

During dry weather conditions, the ALCOSAN interceptor system is designed to convey all wastewater flows from the City and surrounding municipalities to the ALCOSAN WWTF. ALCOSAN's interceptor system includes shallow-cut pipes, deep tunnels, and diversion structures. During wet weather conditions, the flow diversion structures, which are maintained by ALCOSAN, the Authority, and other municipalities, limit or "regulate" the amount of combined sewage that enters trunk sewers and ALCOSAN's interceptor system. In addition, there are regulator points in the sanitary sewer system that relieve or overflow untreated sewage (Sanitary Sewer Overflows or SSOs) to the nearest water body.

Administrative Consent Orders (ACOs) and Consent Order and Agreements (COAs) were issued in early 2004 to the City of Pittsburgh and the other 82 communities tributary to ALCOSAN. The Orders directed compliance with the Pennsylvania Clean Streams Law of 1937 and the Federal Clean Water Act, to eliminate SSOs, and fulfill the Pennsylvania and USEPA CSO Policy obligations. The ACOs were issued to separate sewer communities by the Allegheny County Health Department (ACHD) and the COAs were issued to combined sewer communities by the PADEP. The initial COA among the Authority, the City of Pittsburgh, PADEP, and the ACHD was entered into on January 29, 2004, and later amended in July 2007. The original Orders required communities to complete the following activities:

- Assess and map the sewer collection system
- Clean and televise the sewer collection system
- Make critical repairs
- Conduct flow monitoring
- Develop a long-term wet weather control plan in conjunction with ALCOSAN

Since 2004, the Authority has addressed the consent order's compliance requirements, including the preparation and submission of a Wet Weather Feasibility Study on July 31, 2013. A component of PWSA's Feasibility Study recommended the reduction of CSO's and SSO's by the removal of stormwater flows and the detention of peak storm flows to reduce the overflows during storm events. This study resulted in a recommended "Citywide CSO Plan" which identified critical areas of overflow, and possible abatement using stormwater detention methods. The report also recommended the removal of existing streams from the sewer system to reduce the overall flows to the wastewater treatment plant at all times. The City requested that the USEPA and PADEP agree to PWSA and the City being regulated as its own CSO Compliance Order, as opposed to conditionally being included in the ALCOSAN COA. The City and Authority's request was approved, and a separate Consent Order and Agreement will be negotiated with the USEPA in the near future.

On December 1, 2017, the Authority (with the City as co-permittee) submitted a response to the January 21, 2016 EPA 308 Information Requirement which consisted of a Source Reduction Study (SRS) report for the combined sewer system and sanitary sewer system. The SRS concluded that improvements to the combined portion of the collection system were predicted to have the greatest impacts on mitigating collection system overflows. Further, it was concluded that 85% combined sewage capture

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could be accomplished through the implementation of defined system improvements, which included managing thousands of impervious acres using Green Infrastructure (GI) techniques in priority combined sewersheds, selected stream inflow removal, and regional conveyance and treatment system improvements. These integrated improvements were estimated to result in an annual overflow reduction of over five billion gallons. The City's Green First strategy implements an effective regional CSO and SSO reduction implementation plan for the City and other communities. The plan addresses multiple issues including: regulatory requirements, outreach programs, stream separation and daylighting, CSO and SSO mitigation, flood hazard and basement sewage backup mitigation, and triple bottom line (economic, social, and environmental) benefits.

The Authority recognizes the importance of, and continues to embrace partnerships with neighboring municipalities and other key stakeholders to strategically address reduction of CSO, SSO, surface flooding, and basement sewage backups. Since CSO and SSO are hydraulically connected across the regional service area and storm inflows to the combined system are influenced beyond the City boundaries, partnerships with ALCOSAN during the implementation of their wet weather improvements program, with the connected municipalities, and with organizations such as the Saw Mill Run Watershed Association, will continue to create opportunities for significant source reduction and leverage capital investments to implement multi-problem focused solutions.

The majority of the Authority's sewers are combined. By virtue of these combined sewers and the broader mission of stormwater management within the Authority's service area, the Authority has been engaged in stormwater management since its formation in 1984. Historically, stormwater management services have been shared with the City of Pittsburgh because of the interconnected network of separate stormwater conveyances, combined sewers, street-related infrastructure like curbs and gutters, inlets, and natural channels. As mentioned above, the Authority is currently in the process of negotiating an agreement with the City to more clearly define stormwater asset and management responsibilities through the execution of a MOU with the City.

Despite this ongoing effort and substantial expenditures, drainage and infrastructure problems are numerous, with surface flooding and sewer system basement backups the most visible and vexing issues. The Authority is developing a plan to address these most significant stormwater issues, focused on three primary goals:

- Evaluate, rebuild and maintain parts of the City's stormwater management system; and,
- Evaluate, design, build and maintain projects that keep as much stormwater out of the sewer system as possible, so the existing infrastructure can carry flows most effectively and reduce sewer system basement backups and surface flooding.
- Review and modify existing local regulations and ordinances to establish development controls and mechanisms for dealing with these stormwater related problems.

1.3 The 40-Year Plan

"The Pittsburgh Water and Sewer Authority 40-Year Plan" dated September, 2012 (known as "The 40-Year Plan") estimated the resources needed for capital improvements to the Authority's system. The 40-Year Plan identified upgrades to maintain and enhance the performance of the water and sewer

systems. It contained an estimated system inventory (including pumping and treatment) but only in terms of future replacement requirements (not existing system condition assessments, etc.) and addressed potential acquisitions, system valuations, future water needs, sewer system needs, a waterline risk-based analysis, leak detection and repair, and cost estimates. Cost estimates were developed for distribution system improvements, pumping and storage facilities, treatment facilities, sewers, and Geographic Information System (GIS) improvements based upon regional cost information available at that time. Much of the information originally contained in the 40-Year Plan, including updated capital cost estimates, has been revised and updated since its release.

1.4 The 2019 – 2023 Capital Improvement Plan

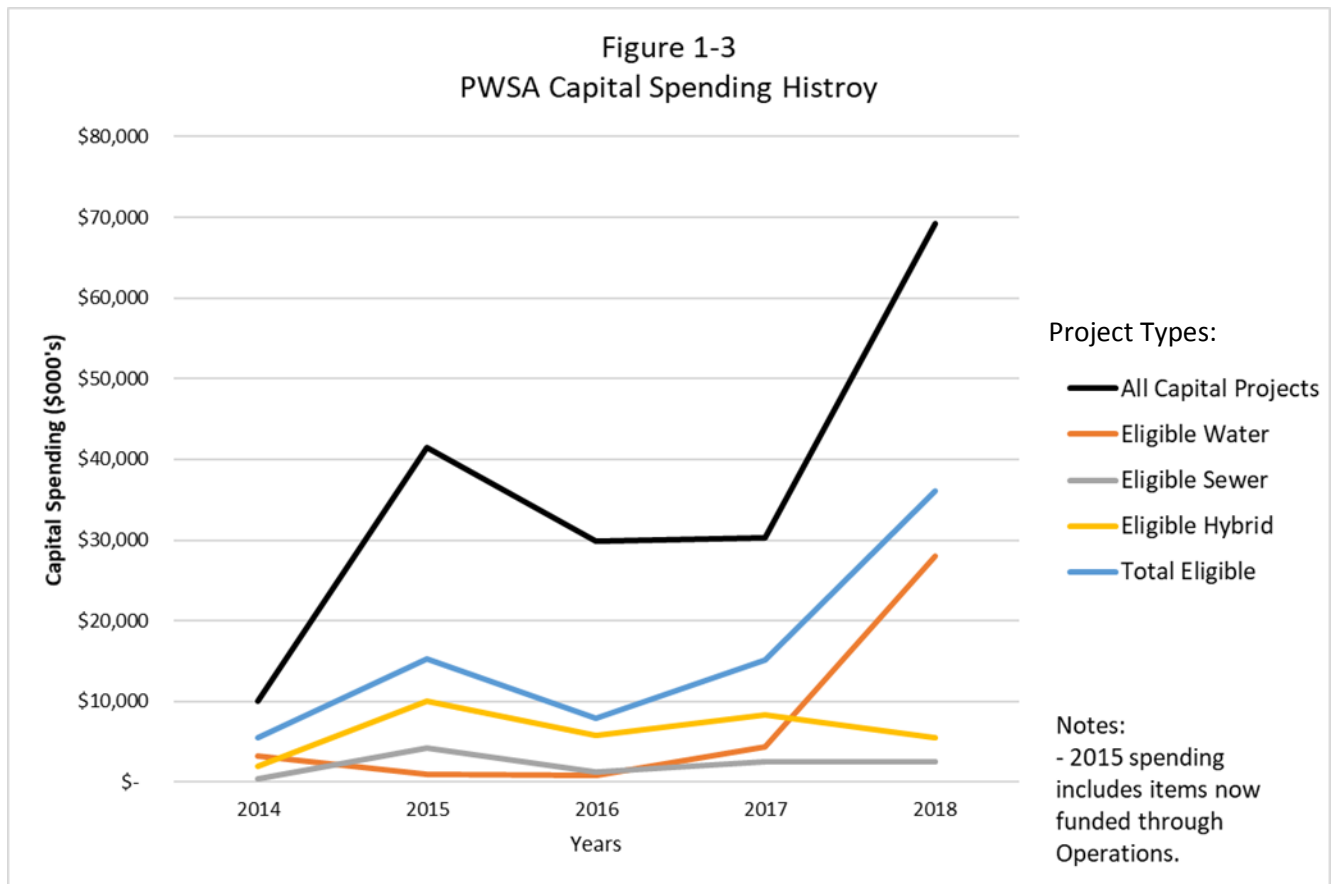
The Authority's overall 5-year Capital Improvement Plan (CIP) from 2019-2023 includes significant investments in the water, sewer and stormwater systems to address aging infrastructure, improvements necessary to meet regulatory requirements, and improve infrastructure reliability and performance. These improvements go well beyond the defined "LTIP" eligible project types defined earlier, but include essential water system improvements that mitigate primary risks of water system failure.

Water system renewal priorities within the CIP include improvements to the Aspinwall Water Treatment Plant, replacement or rehabilitation of the two major finished water pumping stations, upgrades of storage facilities; replacement of critical water transmission mains; continuation of the lead service line replacement program; and acceleration of the small diameter water main replacement program with an overall 5-year budget of approximately \$775 million.

The wastewater system renewal priorities include relocation of sewers under structures to reduce failure (including consequential damages), risk of service disruption and improve performance; projects to remove stormwater inflows and groundwater infiltration from the existing sanitary sewer system; and general sewer rehabilitation of the sewer system to improve the structural condition of the assets. The 5-year budget for these areas is approximately \$155 million.

The CIP also includes stormwater system priorities as well. The highlights include stormwater projects such as the 4-Mile Run stream separation project; separated stormwater sewer upgrades including water quality management systems to reduce siltation and errant sewer connections; and stormwater water detention projects to help mitigate peak stormwater flow impacts on the combined sewer systems, to reduce CSO and SSO's. These stormwater impacts primarily include basement sewage backups and localized street flooding. Approximately \$245 million has been allocated to address priority issues.

Figure 1-3 shows the historical levels of capital spending for all projects and for eligible properties only, not including stormwater projects. Stormwater projects to address property damages are not considered part of the current stormwater regulatory approach, which is focused on CSO and SSO abatement.



1.5 Organization of This LTIP

This LTIP is organized to address two of the three categories of services and infrastructure systems provided and maintained by the Authority: water and sewers (sanitary and combined). The third category of service is stormwater, which will be addressed in a subsequent LTIP if and when necessary. Items 1-6 of the LTIP requirements in PA Code Chapter 121 §121.3 identified above are described for each category, followed by separate sections on cost-effectiveness and evaluation metrics, workforce management, training, and outreach activities.

Water and sewer system maps and other over-size figures referred to in this LTIP are located in Appendix A and are noted as such in the text. Other figures are embedded in the text. In addition, the capital projects tables containing project descriptions, schedules, costs, and other information and other oversize tables are similarly noted and are located in Appendix B. Smaller tables are embedded in the text.

The Lead Service Line Replacement (LSLR) program is a significant part of the capital improvements being undertaken by the Authority over the next several years. This program is described in section 2.2 of this LTIP.

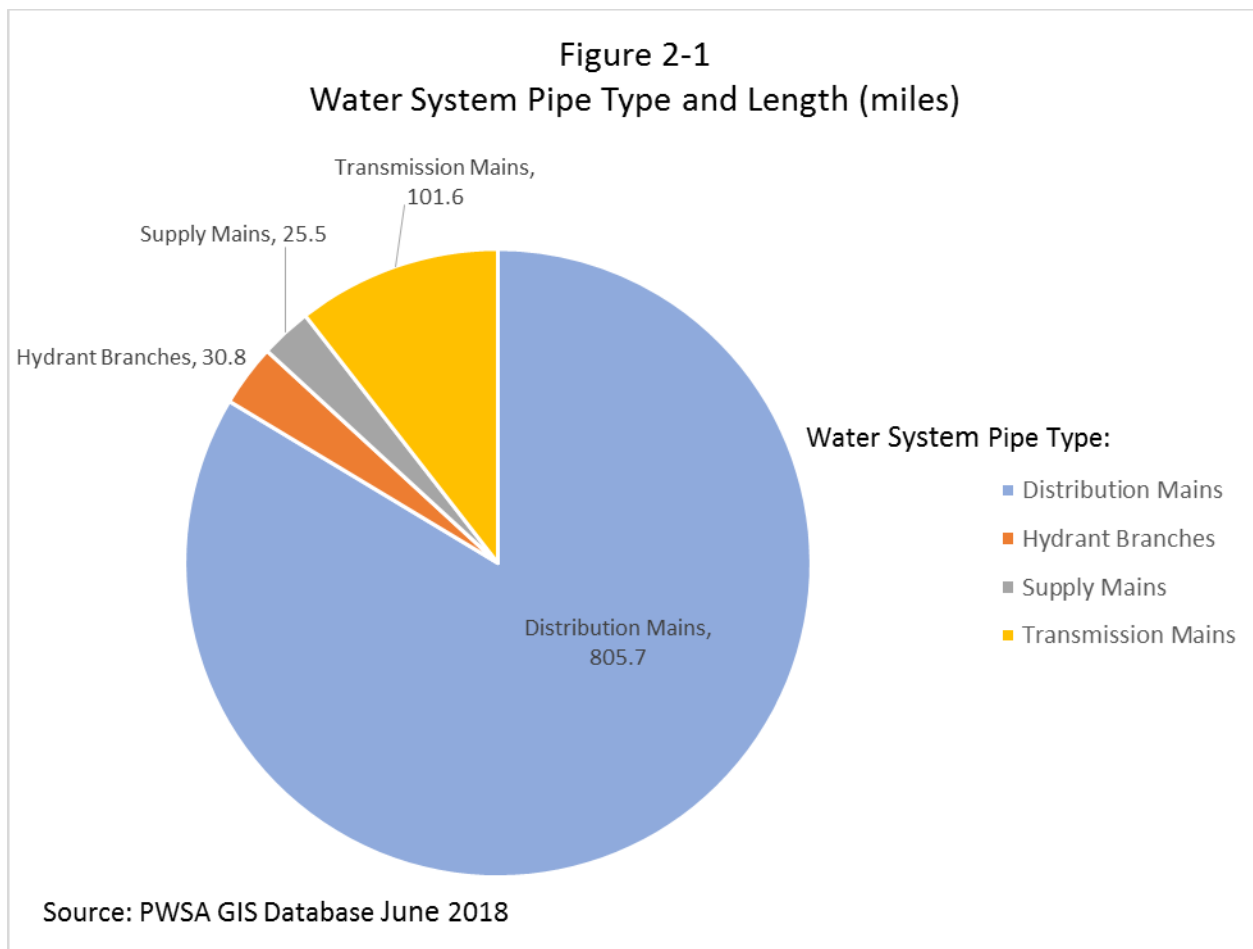
2 WATER SYSTEM

2.1 General Description of Eligible Water System Property

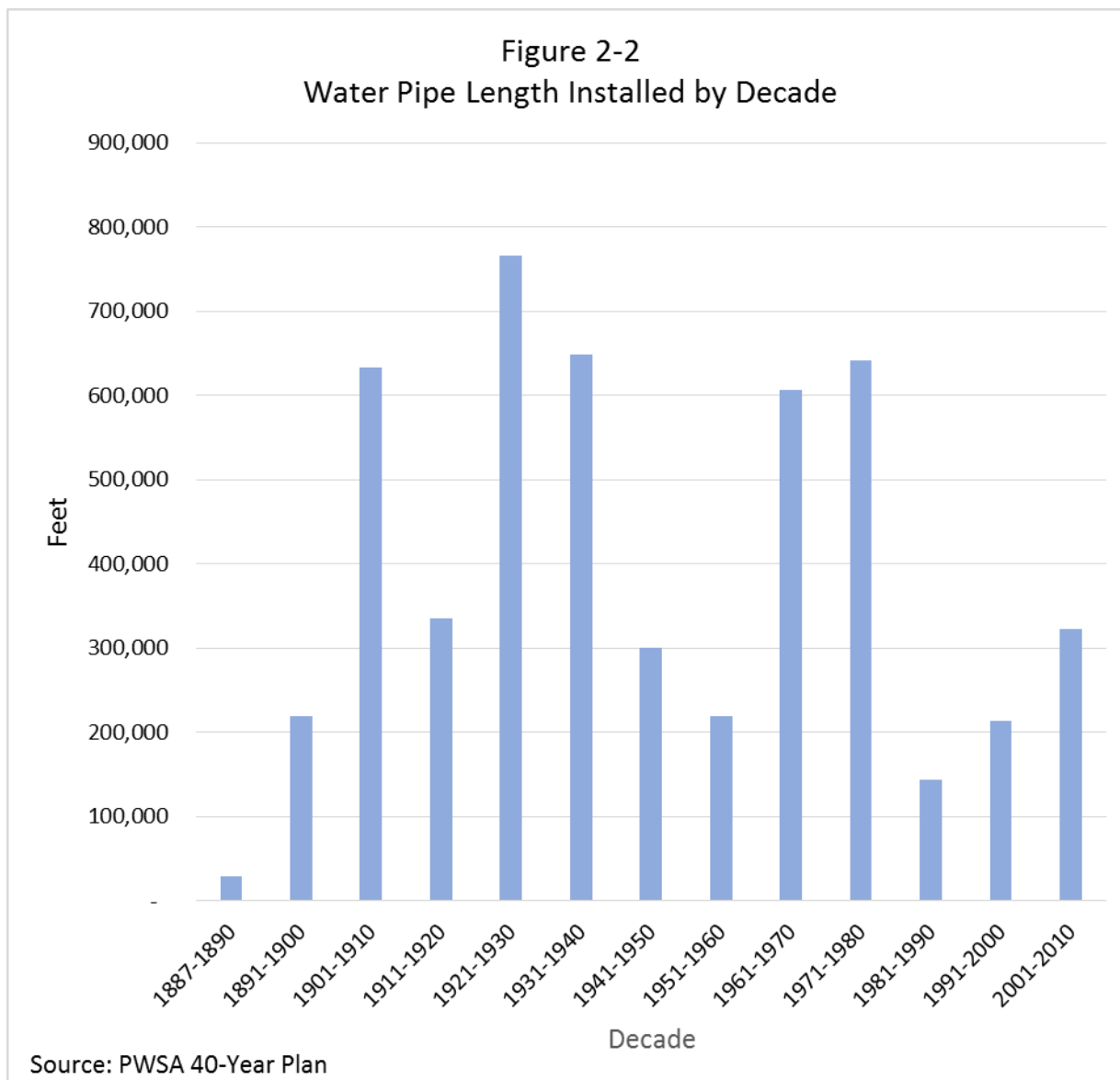
The eligible property associated with the Authority's water supply and distribution system consists of approximately 964 miles of mains, 24,900 valves, and 7,450 fire hydrants. According to the 40-Year Plan, the water pipes average more than 80 years old, with more than 40% installed prior to 1920, and 86% built prior to 1970. Upgrades to the water system have been primarily internal pipe coatings to the larger diameter (>16 inch) pipes, with concrete or carbon fiber linings.

The Authority's Geographic Information System (GIS) database is being updated constantly, and not all eligible property is currently updated in the system. The data input into GIS is an on-going effort, and statistics change with the on-going system updates, reorganization of data, and updates to the features within the system. The Authority's objective is to ultimately expand the GIS to support a mobile workforce digital monitoring and reporting system. As one of the key systems for managing and tracking data within the Authority's water, sanitary sewer and storm sewer systems, the GIS will be the repository of critical data that can be used to manage day-to-day operations as well as a valuable tool for analyzing future capital improvement needs. A digital communication and documentation system, supplied by a third party vendor, known as SpryMobile has been implemented to serve all field operations (maintenance, repairs and upgrades) and ultimately all construction monitoring and systemwide facilities' data updates.

Figure 2-1 shows the length of water lines identified by service type and diameters, a total length of 964 miles, of which almost 720 miles is constructed of small diameter pipes (defined as 12 inch diameter and smaller) Materials of construction include cast iron, riveted steel, wrought iron, ductile iron, and small quantities of High Density Polyethylene (HDPE) and Pre-stressed Concrete Cylinder Pipe (PCCP).



In 2012, an attempt was made to estimate the age of the water system. Figure 2-2 shows the results of that study. The method used to estimate the installation dates was an estimate of the system as a whole, and cannot be used to identify the age of a specific pipe segment. Secondly, the method used tends to skew the age to be newer than actual. Therefore, the information contained in Figure 2-2 is an estimate. A project is anticipated to start in 2018 to update water main material and age in the GIS system and the information contained in Figure 2-2 should be viewed as a high-level assessment of the overall age of the system.



Water valve sizes range from 4 inches to 96 inches and include those shown in Table 2-1.

Annual pipe breaks are much higher than that experienced in other water systems. These pipe breaks exceed 600 to 800 per year, and commonly occur within the small diameter water distribution pipes. Pipe breaks have recently been analyzed for the root cause, which appears to be caused primarily by one of three causes: (1) pipe metallic joint caulking materials used as a replacement for lead when scarcity occurred during the 1930's and 1940's, (2) use of steel slag materials for pipe bedding and general trench fill materials, and (3) general age and condition. The predominate mode of pipe failure has been shown to be related to corrosion of the external pipe surface as a result of the slag fill materials, which encourage cast iron, steel and ductile iron pipe pitting. The only successful methods of small diameter pipe restoration appear to be replacement, given their age and condition. The largest diameter pipe can often be structurally lined to restore the capacity and structural integrity of these key water transmission pipes.

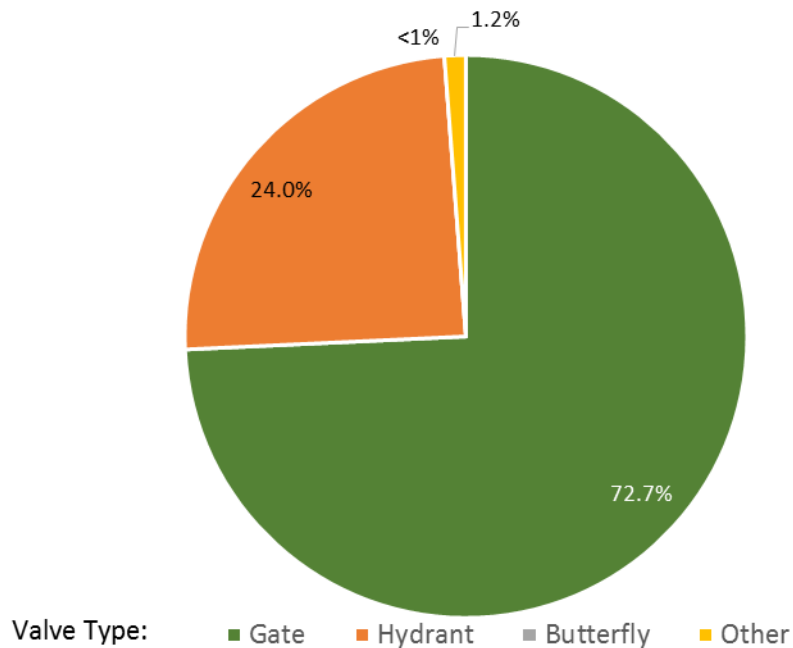
Table 2-1
Number of Water System Valves by Size

SIZE	ESTIMATED QUANTITY		SIZE	ESTIMATED QUANTITY
4"	637		42"	18
6"	14,595		42-1/2"	6
8"	6,136		48"	61
10"	351		50"	4
12"	2,528		50-1/4"	2
14"	8		60"	12
15"	27		72"	2
16"	573		96"	1
			TOTAL	24,961
Source: PWSA GIS Database June 2018				

Figure 2-3 identifies the types of valves in the system and their relative proportions.

Annual water loss statistics have consistently shown an elevated water loss rate, more than 50% of the produced water. This metric confirms the overall poor condition of the PWSA water mains. As mandated by the PUC compliance plan, PWSA has embarked on a continuous program of water leak detection. This program attempts to preempt resultant major water main breaks by identifying leak locations for immediate repair before a break occurs. Also, in accordance with the water main conditions exposed during the leak detection, specific water main replacement projects are identified and prioritized.

Figure 2-3 Water Valves by Type



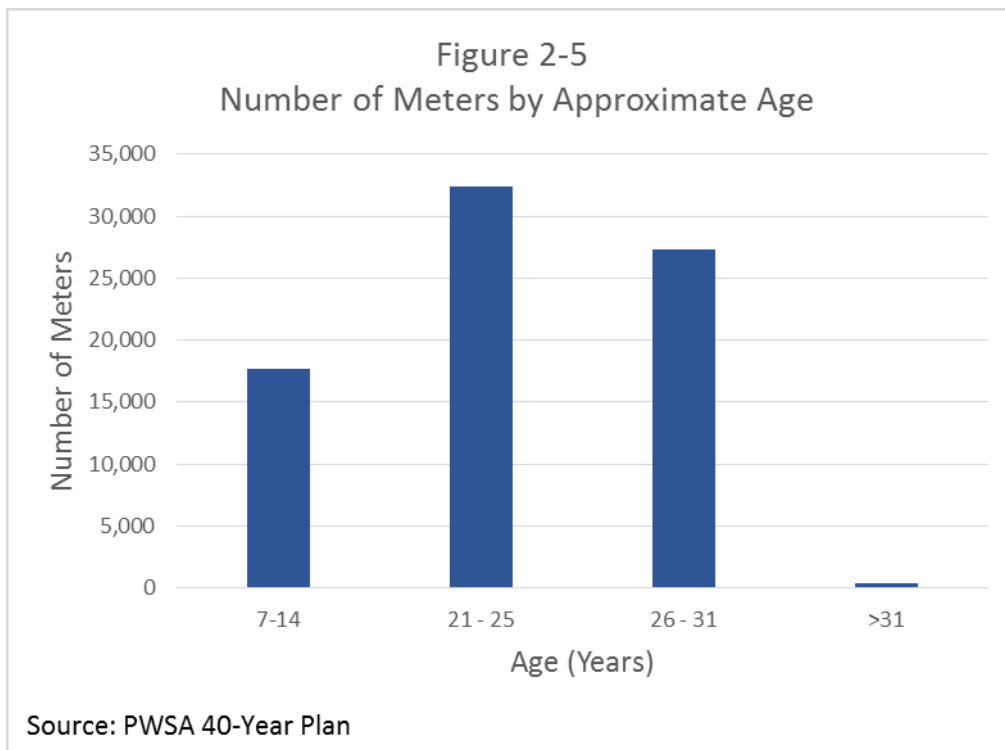
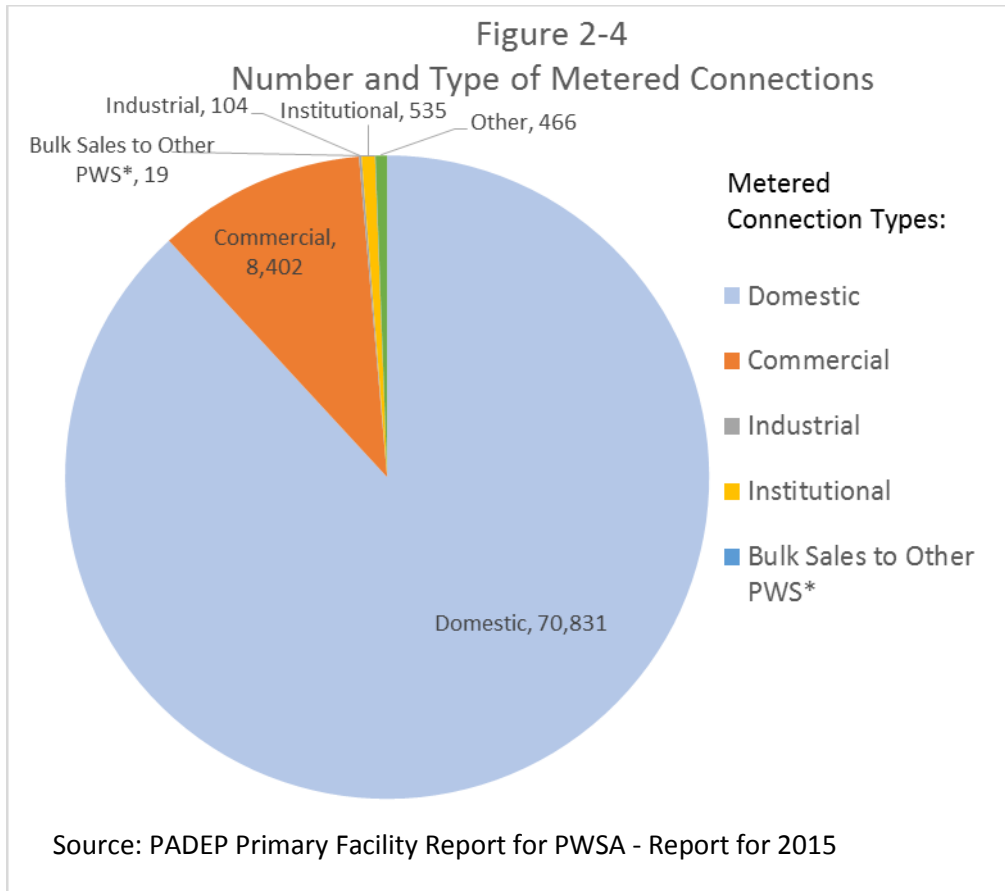
Source: PWSA GIS Database June 2018

Dividing pressure valves (currently closed) account for 486 of the valves shown in Figure 2-3. The “Other” valve category shown in the figure includes ball, cone, air control, check, pressure regulating, and vacuum release valves. Hydrant valves are typically gate valves.

The Authority’s GIS database is currently being reviewed to: a) confirm locations where meters are installed; b) identify locations where meters should be added; and, c) confirm locations where a meter is legitimately absent (e.g., flat rate customer or no water service). The total meter tally is currently over 80,000 based upon the information in Figure 2-4. Figure 2-5 shows the number of meters by approximate age.

The most recent systemwide valve assessment project was performed in 2010.

PWSA’s water system has over 400 water “blowoffs”, locations by which the water system can be drained for maintenance and repair. Many of these pipes are connected to adjacent sewers or drains which no longer comply with the design requirements. The PADEP has mandated in its November 2017 Consent Order and Agreement that these interconnections be eliminated as soon as possible. PWSA has embarked upon a comprehensive assessment of the blowoff locations and existing interconnections to the sewer and drainage systems. The PADEP has mandated that these blowoff connections be eliminated as a sanitary risk to the drinking water system. PWSA is currently identifying their locations and conditions to prioritize their removal from the system to lower risk of cross contamination.



There are approximately 7,474 public fire hydrants in the system.

2.2 Lead Service Line Replacement Program

During the June 30 and December 31, 2016, and December 31, 2017 rounds of compliance sampling of water in the Authority's distribution system, the lead action level of 15 ppb as enumerated in 25 Pa. Code § 109.1101 was exceeded. The Authority's Lead Service Line Replacement (LSLR) Program was developed to address the requirements of the aforementioned code, an April 25, 2016 Pennsylvania Department of Environment (PADEP) Administrative Order, and a November 17, 2017 PADEP COA. The LSLR Program has been modified in accordance with the Commission's March 26, 2020 Final Order in the Authority's underlying Long-Term Infrastructure Improvement Plan proceeding. The LSLR Program outlines a plan to complete the replacement of all public- and private-side lead service lines in the Authority's system. The Authority was also directed to optimize corrosion control measures in the system to mitigate the release of lead in drinking water.

2.2.1 Lead Service Line Replacement Policy

PWSA's current goal is to complete the replacement of all public- and private-side lead service lines in its system by 2026. The objectives of the Program are to:

- Reduce the amount of lead (and ultimately eliminate lead service lines entirely) in the Authority's water distribution system;
- Mitigate lead exposure through water consumption for the customer as quickly as possible;
- Comply with state and federal regulations; and
- Refrain from performing partial lead service line replacements at residential properties.

The Policy includes the replacement of public- and private-side lead service lines at any residence, of which PWSA is aware, where the replacement is operationally feasible. In the case of a private-side line, the owner must either authorize the replacement by PWSA, or replace the line in accordance with PWSA policy.

PWSA's LSLR Policy also provides for retroactive, private-side replacements to be performed by PWSA for partial replacements of public-side lead service lines previously completed by PWSA between February 1, 2016 and December 31, 2018. For customers who elected to replace their private LSL as a result of a PWSA public side LSL replacement between February 1, 2016 and December 31, 2018, PWSA will offer a direct reimbursement for costs incurred up to a maximum of \$5,500.

The Authority's lead policy in its entirety is contained in Appendix C of this LTIP.

2.2.2 Inventory of Lead Service Lines

PWSA is working with the University of Pittsburgh to develop a machine-learning model that will predict the material composition of public-side and private-side service lines, based on a model used in Flint, Michigan. After the machine-learning model generates predictions for the composition of all public- and private-side service lines and no later than March 31, 2020, PWSA will present to the Community Lead Response Advisory Committee (CLRAC), for its information and advisory input, PWSA's plan for completing its inventory of service lines, including the steps PWSA will take to further investigate the composition of service lines based on the model's predictions.

By December 31, 2020, PWSA will establish (and provide to the CLRAC, for its review and advisory input), an estimate of the number of private-side lead service lines connected to residential structures in PWSA's service area. PWSA will provide an update to this inventory on an annual basis. A full description of PWSA's inventory efforts and commitments is included in Appendix C.

2.2.3 Corrosion Control Program

In April 2016, the Authority initiated a Corrosion Control Study to determine the optimum chemical strategy for reducing lead release due to corrosion of lead service lines and building plumbing. The study's goal was to identify an effective, immediate and minimal cost approach to achieve compliance with the lead action level. The approach was assessed to ensure that it did not otherwise adversely impact water quality in the distribution system. The study tested two corrosion inhibitors: orthophosphate and silicate. Each has advantages and disadvantages for water quality management, risks to sustained performance and cost-effectiveness.

Orthophosphate is commonly used for distribution corrosion control by many world-wide water utilities. It establishes a microscopic "barrier" to prevent pipe corrosion. However, phosphates are a nutrient and can stimulate biofilms in the distribution piping and algal growth in downstream waters. This is a concern for the Authority, which uses an uncovered finished water reservoir (Highland Reservoir 1), and has public water uses for park amenities that are similarly uncovered ; therefore, to avoid algal growths, a number orthophosphate feed systems were installed downstream of the reservoir, compared to one central feed system.

Sodium silicate does not result in algae blooms but is only used for corrosion control by a limited number of water systems, i.e., data on its historical performance is more limited than that of orthophosphate.

The corrosion control study used water treatment plant filter effluent from the sedimentation basins (partially treated) and plant effluent which is to the clearwell (fully treated finished water). The study included both pipe loop stagnation/flow schemes focusing primarily on metal release from lead service line sections, coupled with complementary, but separate testing consisting of continuous flow monitoring metal corrosion stations.

The primary results of the interim study (the *Corrosion Control Study, Final Interim Report* dated December 29, 2107) found that orthophosphate addition would be much more successful in lowering average dissolved and particulate lead release than silicate addition. However, orthophosphate addition showed a large increase in microbial populations when the chemical was added. The study recommended continuation of the testing protocols to establish the preferred chemical treatment

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scheme and identify appropriate dosages to effectively treat the system, while minimizing any microbial impacts.

Additional pilot testing and monitoring was completed as recommended in the Interim Report and a Final Report was issued on March 29, 2018. The Final Report included recommended performing additional water quality testing in order to optimize the orthophosphate feed rate for lead and copper corrosion control and included review comments from the PADEP. While the report recommended the addition of orthophosphate at an initial dosage of 3.5 mg/L for lead corrosion control, additional testing at a dose of 1 mg/L is being performed. The lower dose may result in less of an increase in microbial populations and perhaps will still achieve satisfactory lead reduction. The Authority completed the design of the appropriate corrosion control chemical feed storage and feed facilities for the water system. Applications for permits for the addition of the corrosion inhibitor have been submitted to PADEP, and a construction permit was issued on September 24, 2018. PWSA will provide the Commission, the Parties, and the CLRAC with quarterly updates regarding the progress of PWSA's orthophosphate program, when PWSA started testing for lead levels, and the results of the lead level testing.

2.3 Water System Replacement and Prioritization Approach

The Authority is working to accelerate the replacement of small diameter water mains. In both 2018 and 2019, the Authority committed to replacing two miles of small diameter main per year. With approximately 720 miles of small diameter main in the system, this equates to 0.2% of the system per year. The Authority is targeting to annually replace 1% of the system by 2024. Planned distribution system modeling and water main break analyses will ultimately determine what level of spending will be required going forward to maintain an adequate, safe and reliable system. The Authority will consider increasing the annual water main replacement spending beyond the levels stated above to match the maximum funding available.

A small annual contract for the urgent replacement of water mains, valued at approximately \$1 to \$2 million a year is also part of the Small Diameter Water Main Replacement (SDWMR) Program. The purpose of this small contract is to replace small areas, typically a block or less, where a water main replacement is needed urgently due to a failure to a pipeline with a highly compromised condition.

2.3.1 2018 Small Diameter Water Main Replacement Program

The 2018 SDWMR Program consists of the projects identified in Table 2-2. These projects were qualitatively prioritized based on break history, available fire flow, and major users served. These projects were constructed in 2019.

Table 2-2
Location and Quantities of Materials for 2018 SDWMR Program

Neighborhood	Streets	Length (feet)	Diameter
Homewood	Hamilton Avenue from N. Dallas Avenue to N. Homewood Avenue	2,310	Replace existing 6-inch diameter main with 12-inch diameter main
Bloomfield	S. Millvale Avenue from Liberty Avenue to Friendship Avenue, Friendship Avenue from S. Millvale Avenue to Gross Street, Gross Street from Friendship Avenue to Friendship Avenue	1,372	Replace existing 6-inch diameter main with 12-inch diameter main
Strip District	Railroad Street from 25 th Street to 32 nd Street	4,347	Replace existing 10-inch diameter main with 12-inch diameter main
Millvale	New connection from the Lanpher Rising Main to Evergreen Avenue	2,500	Millvale only has one connection from the Lanpher system. This second connection will provide redundancy to the Millvale system.

2.3.2 Water Main Replacement Prioritization Program

Going forward, the Authority has developed a formal planning process for the SDWMR Program, which includes project scoring criteria to prioritize replacement projects. In 2019, the project scoring prioritized previously identified water main replacement projects (also known as “relays”). This list includes projects which were previously submitted for grant applications or other funding sources but never completed, projects which were identified as water main break problem areas by Authority Operations staff, and projects which were considered critical areas of the system in need of upgrade by Engineering staff. The prioritization model was used existing project information to select the specific water main locations that were included in the 2019 SDWMR program. Future SDWMR projects will be developed using a more comprehensive evaluation of each segment in the distribution system using available GIS data (including recent water main condition data), and the recently updated hydraulic model. The results of this analysis will update the Water System Master Plan and our proposed CMMS development.

The criteria to be used for this prioritization model were selected based on the current availability of data that could be used to anticipate the likelihood and consequences of failure as well as water quality impacts. Failure is defined as occurring in one of four possible modes: capacity, level of service (LOS), mortality, and efficiency. Capacity failure occurs when the volume of demand exceeds design capacity. LOS failure is defined as functional requirements exceeding the design capability. These failure analyses consider codes and permits regarding water quality and other criteria regarding service levels. Failure due to mortality is defined as the degradation of an asset below an acceptable level of performance due to physical deterioration (pipe failure and main breaks). An efficiency failure would arise when the operations costs exceed the cost of other alternatives, such as replacement or rehabilitation.

The following is a list of criteria used for the evaluation of potential projects for the 2019 Small Diameter Main program:

2.3.2.1 Likelihood of Failure

Pipe Diameter – Pipe diameters of less than 8 inches have been selected as a priority. The intent is to replace undersized pipes to improve flow volume performance. Prior investigations (Chester, 2012) correlated the incidence of inadequately performing fire hydrants with small diameter pipes.

Fire Flow Improvements – The purpose of this criteria is to prioritize the replacement of pipes located near underperforming fire hydrants. Flow test data from hydrants adjacent to the water mains are used to target locations with this deficiency.

Pipe Break History – Segments where multiple pipe breaks have been recorded are being prioritized. Also, pipe areas with known corrosion impact history will be prioritized.

Lead Service Lines – To coordinate with the Authority’s LSL replacement program, areas with a high concentration of LSLs have been prioritized for water main replacement. LSL locations were identified using approved historic record data, LSLR contract data, known replacements by Authority operations personnel, known water main relay areas, and curb box inspection results.

Working Pressure – The 40-Year Plan (Chester, 2012) identified an empirical relationship between main break frequency and normal working pressure. Mains under higher pressure were noted as being up to

three times as likely to experience breaks. Pressure monitors have been installed across the City and are now being operated.

Pipe Age – The 40-Year Plan (Chester, 2012) also noted an empirical relationship between main break frequency and pipe age. Water mains installed between 1935 – 1955 had by far the highest likelihood of failure. This can likely be attributed to the widespread use of leadite joints during this period. Leadite is a plasticized sulfur cement that was widely used during this period. Pipes installed prior to 1935 also show an elevated break frequency rate, though not as high as during the leadite era. The scoring criteria for pipe age have been calibrated to account for the above noted differences in the frequency of main breaks.

Recent studies of much younger distribution pipeline breaks (on pipes installed since 1980's) show that corrosion issues have impacted the ductile iron pipe segments. To address this issue, PWSA is modifying the design of water main materials to include metal coatings or other barriers to corrosion.

2.3.2.2 Consequence of Failure

Water Main Location – Water mains located outside of the roadway have been prioritized. These pipes are located under sidewalks or even outside of the right-of-way. Due to the difficulties that may be encountered if a water main break should occur in these locations, the replacement of these water mains has been prioritized.

Traffic Functional Classification – Pipe failures under high traffic locations cause high impacts, both to the water utility in the form of increased repair costs due to traffic control, higher risks to employees and contract workers, and traffic disruptions for the community. Water mains located underneath critical transportation routes have therefore been prioritized. Primary arterials and interstates have been given the highest rating, followed by minor arterials. Major/minor collectors and local streets are ranked lowest.

Critical Facilities – Water mains serving hospitals and medical facilities have been given a higher priority rating. The consequences of the loss of water service to such facilities should a water main break are much higher than for the typical customer.

Based on the selection criteria described above, a scoring system was developed and applied to each potential project (see Table 2-3).

Table 2-3
Selection Criteria for SDWMR Program

	Criteria	Description	Score	% of Total Score
Likelihood of Failure	Pipe Diameter	8" or Greater	0	10
		6"	50	
		4" or Smaller	100	

	Criteria	Description	Score	% of Total Score
	Fire Flow Improvements	Meets Fire Flow Requirement	0	10
		Fire Flows under 1000 gallons per minute (gpm)	50	
		Fire Flows under 500 gpm	100	
	Pipe Break History	No known pipe breaks	0	20
		1 - 2 breaks per segment	50	
		3 or more breaks per segment	100	
	Lead Service Lines	0 LSL/100 LF: Based on available information, there are zero identified lead service lines per 100 LF of main replacement	0	5
		0.01 to 2.99 LSL per 100 LF: Based on available information, there are between 0.01 to 2.99 lead service lines per 100 LF of main replacement	50	
		3 or more LSL per 100 LF: Based on available information, there are over 3 lead service lines per 100 LF of main replacement	100	
	Working Pressure	< 120 psi	0	7
		120 psi - 180 psi	50	
		> 180 psi	100	
	Pipe Age	> 1970	0	10
		1955 – 1970	25	
		1935 – 1955	100	
		1910 – 1935	50	

	Criteria	Description	Score	% of Total Score
		< 1910	100	
	Sub Total Percentage of Likelihood of Failure Criteria			62
Consequences of Failure	Water Main Location	Water main located inside roadway limits	0	10
		Water main outside limits of roadway	10	
		Water main located under structures	100	
	Traffic Functional Classification	Major/Minor Collectors, Local Roads	0	10
		Minor Arterials	25	
		Primary Arterials and Interstates	100	
	Critical Facilities	Noncritical customers	0	18
		Has Critical Customers Tap (Hospitals and Medical facilities)	100	
	Sub Total Likelihood of Likelihood of Failure Criteria			38
Total Percentage				100

The ranking criteria outlined above will be revisited on an annual basis to ensure that the SDWMR program is cost-effective and addressing the most critical issues in the distribution system. The need to coordinate future water main replacements in conjunction with sanitary sewer or storm sewer replacement/improvement projects to minimize disruptions to the community and save on surface restoration will be considered in the site selection process. In addition, coordination efforts will also be undertaken to coordinate water main replacement with the City, County and State road restoration projects to minimize surface restoration costs. Finally, there will be an active coordination program with other utilities to ensure the Authority's activities are integrated with other utility improvements to achieve a net savings in road restoration impacts.

2.3.3 2019 Small Diameter Water Main Replacement Program

As noted above, the 2019 SDWMR potential projects were prioritized from a list of previously identified potential projects. The highest scoring projects which fit within the allocated \$8.1 million construction budget for the 2019 SDWMR Program were selected for inclusion in this project. The selected projects and their scoring are shown in Table 2-4 in Appendix B.

Additional information related to the Authority's SDWM Accelerated Replacement Program is provided in Appendix C.

2.3.4 2019 Large Diameter Mains

The Authority is working to assess the condition and prioritize the rehabilitation or replacement of large diameter water mains.¹ In 2019, strategic replacement or rehabilitation of large diameter water mains (16-inch and larger) and appurtenances is being undertaken to improve system reliability and hydraulics, which will also result in more efficient and cost-effective internal and external inspections. By maintaining a proactive approach to asset management such as this program, efforts are directed towards remedying issues before assets fail, thus resulting in a savings in the replacement cost as compared to emergency/reactive repair costs. Typically, large diameter pipe is not readily available and has a 6- to 8-week lead time for delivery. A large percentage of the Authority's large diameter mains are riveted steel, which cannot be repaired without a premanufactured liner, specialized fittings and field fabricated specialty pipe repaired.

Rising mains transmit finished water from the Water Treatment and Primary Pumping stations to the three Finished Water Reservoirs. The Lanpher Rising 60-inch diameter riveted steel main has incurred two major breaks since 2014. Each break required emergency water pumping and system water operations to provide water to all users. Each of these projects has resulted in 4 to 6 month shutdown of the critical rising main, and cost more than \$2.5 M. To address this critical system defect, PWSA has embarked on constructing new rising main parallel to the existing Lanpher Rising Main. The project design will be completed in 2020, and construction of the new Rising Main will begin in 2021. Rising Mains 3 and 4 from the Bruecken Pump Station have been selected for improvements in 2019. These mains carry more than one third of the daily water demand and are approximately 2.3 miles in length. They will also be relied upon to maintain a higher percentage of the Citywide daily demand during the replacement of the clearwell. Therefore, it is imperative that they be inspected and rehabilitated, or replaced prior to the termination of the existing clearwell (disinfection contact system).

Prioritization of additional large diameter mains for condition assessment, rehabilitation, and replacement will be completed through future system modeling and analysis projects. Many of the large diameter mains are constructed of riveted steel, and past breaks have shown significant corrosion and loss of structural strength. At this time, in-pipe condition assessment for these riveted steel pipes is

¹ The Authority's efforts to rehabilitate or replace large diameter water mains are consistent with the September 2019 PADEP COA.

limited, and there are no “reliable” options for pipe materials testing. Further evaluation of in-pipe condition assessment tools for these pipes will be evaluated as part of the master planning process.

2.3.5 Annual Hydrant and Valve Replacement Program

The Authority maintains annual contracts to replace broken or inoperable hydrants and replace inoperable valves. These contracts do not include the replacement of hydrants and valves through watermain replacement projects.

Hydrants that are found to be inoperable during routine maintenance and flushing activities, or reported through the local fire departments, are assigned to be replaced via the annual contract. In both 2018 and 2019, the Authority has committed to replacing one hundred hydrants per year, which is approximately 1% of the total.

Valves 4 to 10 inches in diameter that are found to be inoperable are typically replaced by Authority maintenance personnel when encountered during routine operations. Valves 12 inches in diameter and larger are replaced under an annual contractor replacement contract. PWSA’s Valve Replacement Project will conduct a valve condition survey to identify valves that are paved over, inaccessible, or inoperable requiring repair or replacement. As inoperable valves are identified through the survey, they will be prioritized and included in the annual replacement contract. Planned system modeling and analysis will ultimately determine the primary valve locations and the level of spending that will be required to maintain an adequate, safe and reliable system.

In order to improve the efficiency of water operations staff managing the day-to-day maintenance of the system, as well as addressing emergent needs during water main breaks, the Authority has implemented an interim computerized work order maintenance system to track valve status and closures. As valve management is a long-term program, as an initial step, and as part of the valve survey, a valve database is being developed to document the location, size, type and operating condition of the valve in the system.

The valve location will be linked to geographic coordinates (GPS) and linked to the water GIS. The goal of the program is to have all valves in the system linked to the GIS and valve database so that field crews can have real-time access to this information. Field crews will be able to quickly identify inoperable valves, normally closed valves (boundary valves, for example) and valves that may be closed for routine maintenance or system operations. As the valve database is expanded, it will also facilitate rapid system analysis to identify which valves will need to be closed to isolate a main for repairs. In addition, the valve database will improve tracking of closed valves to ensure that all valves closed during a main repair are returned to open status.

2.3.6 Small Meter Changeout

According to the best available information, the Authority has as many as 50,000 meters that have exceeded the time allowed in the Commission’s recommended testing schedule and will need to be tested and replaced. Given the magnitude of the changeout program, the Authority is proceeding to perform this work over a 5-year period. Initially, the existing staff has accelerated the meter changeouts from about 4000 (2018) to 12000 (2019) per year, by expanding the Authority’s plumbing staff. The Authority has determined that its own plumbing staff offer a cost-effective and expedient approach to completing this program.

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2.3.7 Unmetered and Flat Rate Properties

Historically, the City of Pittsburgh did not provide water meters on municipal and government buildings. It is estimated that there are roughly 200 – 400 sites that are currently unmetered. Providing meters at these buildings is a critical program to improve overall metered consumption given the current unaccounted-for water in the system. In addition, the Authority has approximately 500 flat rate customers - customers who are charged a monthly flat rate for services. These flat rate customers are typically either party line customers, service lines that serve more than one property, or locations that are known to not have meters. The Authority is proposing a 5-year period to complete the Unmetered and Flat Rate Properties meter installation program. The Authority has engaged a technical consultant to evaluate these meter locations to determine the most practical manner to establish metering for these properties; a report on the recommended approach for these meters is due in June 2020.

Initially, the cost of the meters and installation costs including meter chambers, connective piping, backflow prevention devices, etc. will be borne by the Authority under the current CIP, and in some cases the Authority and the customer will share costs. Ultimately, any costs borne by the Authority will be billed to the customers in accordance with PWSA's Tariffs or separate agreements.

2.3.7.1 Unmetered Properties

The first step in this program will be to identify all facilities that do not contain flow meters. As many of these buildings are municipal-type structures with large service connections, it is imperative to identify the building address, locate the incoming service connection to verify the size, estimate the typical daily usage, and identify the need for separate fire suppression metering in order to determine the appropriate meter size and type for the facility.

The new meters will need to be installed in accordance with the Authority's design guidelines which may include meter vaults in sidewalk areas. It is anticipated that in many instances the installation of new meters will require that a detailed design be undertaken for each location including: field location surveys to determine underground utilities in the area; determination of the appropriate size and type of meter for the facility and the potential need for separate fire suppression lines and detector check-metering; meter orientation and accessories to assure accurate metering; means and methods to effectively install the new meter(s) while minimizing shutdown periods to the building; positioning the new meters in a location that will be easily accessible for future maintenance; etc.

Approximately 100 sites have already been identified and there is a program in place to locate and visit the remaining locations. Once the inventory of unmetered properties is completed, a prioritization process will be undertaken. It is envisioned that the priorities would be to install meters at the largest users first and concentrating on those facilities that can easily accommodate a new meter with minimal impact on the facility and surrounding areas. It is expected that the meter installations will be included in annual meter installation contracts which will include approximately 50 - 75 installations depending on overall complexity and cost of the installations.

PWSA commits to the following timeframes:

- By June 29, 2020 unmetered and/or unbilled locations shall be identified.

- PWSA will provide status updates regarding this process in the PWSA Compliance Plan Quarterly Reports and, once complete, PWSA will identify all the newly metered and/or previously unbilled properties.

2.3.7.2 Flat Rate Properties

The first step for flat rate properties will be to evaluate each site to determine the reason that the property is flat rate. Some meters can be installed by Authority operations. However, some properties, such as party line properties, will need assistance from engineering or an outside contracting service for design of the party line separation. The Authority anticipates that many of these party lines could be lead and will also require the assistance of the lead service line replacement program team to ensure proper customer outreach and regulatory compliance.

2.3.8 Large Meter Replacement Program

In addition to the installation of new meters at unmetered buildings, the Authority will also be undertaking a large meter changeout program. Those aged meters (estimated to be approximately 800, 3-inch and larger units and approximately 2,500 1.5-inch to 2-inch units) that are not in compliance with PUC regulations will be scheduled for replacement. These meter replacements will be undertaken by current staff over the next 5 years. However, the Authority will evaluate the need for additional outside contract services to perform pre-installation inspections of each location to determine work and equipment required prior to mobilization of meter crews.

2.4 Eligible Water System Property to be Improved

Table 2-5 in Appendix B describes the 12 projects or project categories which comprise the eligible water system projects of this LTIIP as discussed above. These projects conform to the definition of “eligible property” described in section 1.1.1.

2.5 Initial Planned Repair and Replacement Schedule and Projected Annual Expenditures

Table 2-6 in Appendix B identifies the costs associated with the 52 projects for each year of the project schedule through 2023 organized into the following major project categories:

- Hydrant Replacement
- Valve Replacement
- Water Relay Replacement
- Small Diameter Water Main Replacement
- Large Diameter Water Main Improvements
- Large Water Meters
- Small Water Meters
- Lead Service Line Replacement

2.6 Acceleration of Water Projects

2.6.1 Lead Service Line Replacement Program

Through an accelerated LSLR program needed to meet the COA deadlines, the Authority has developed a more complete understanding of the issues associated with lead service replacements in a City like Pittsburgh. Replacing lead service lines on public and private property in the Authority system has presented numerous construction challenges. The City's topography means that many private lead service lines run underneath obstructions such as concrete retaining walls and stairs. In addition, soil conditions vary in each neighborhood which can make trenchless techniques like boring or pulling infeasible. Water service line length also varies greatly at each property which can increase costs and impact constructability. In response to these challenges, the Authority and its contractors are applying innovation and ingenuity to minimize private property impact while also maintaining a pace of replacement to meet COA requirements.

The Authority Board of Directors approved a \$44 million budget in 2018 to fund both the public and private side replacement for lead service lines throughout the Authority service area. The public and private line replacements are performed by several contractors selected by an open public bid process. The replacements are organized by work area typically made up of several contiguous blocks. The work order areas were initially selected based upon curb box inspections and historical record analysis, and further prioritized by health and census data from the Allegheny County Health Department. To spread the replacement program across the Authority service area equitably, the 2018 replacement program includes work orders in areas in each Council District and Millvale.

The Authority submitted an application to the Pennsylvania Infrastructure Investment Authority (PENNVEST) for \$50 million in funding for a LSLR program in 2019. The process would be similar to 2018 in the selection of replacement areas, contractors, and other components of the program and would replace approximately 2,800 additional public (and corresponding private as applicable) lead service lines.

Based on the March 29, 2018 Updated Materials Evaluation report, there are an estimated 12,218 lead service lines within the Authority's water system. It is the Authority's intention to replace the remainder of the lead service lines through a combination of its annual water main renewal program, continued minor (as required) LSLR programs, and replacements by the Authority's Operations Department as a response to leaks. After the LSLR Programs of 2017, 2018 and 2019, there will be an estimated 6,600 lead service lines remaining that would be replaced under the annual water main renewal program.

After 2019, future LSLR programs will focus on areas of the City where water mains were installed due to unacceptable fire-flow in neighborhoods with existing mains in sidewalk areas. In these areas the new water mains only serve fire hydrants and the existing water mains located in sidewalk areas continue to serve the residences. In these areas new service lines will be connected to the new main (in all locations, not just where there is lead), and the old water mains in sidewalk areas will be taken out of service and abandoned. There will also be the potential of a future individual LSLR contract to address other locations (as compared to the neighborhood contracts previously described).

As previously described, one critical criteria for selecting future water main renewal locations is the presence of lead lines, which the Authority anticipates will be the focus of the water main renewal program for the next several years.

Finally, the Authority's Operations Department routinely replaces about 200-250 lead service lines per year in response to leaks in water mains or service lines. This number is anticipated to decrease in progressive years as the number of lead service lines are reduced in the system.

Based on the LSLR program outlined above, Table 2-7 shows the anticipated timetable for removal of lead service lines by 2026. Note that the number of lines replaced via LSLR Contracts and the SDWMR program will be refined as the concentration of lead service lines in individual areas is further characterized:

Table 2-7
Anticipated Timetable For Removal of Lead Service Line Lines by 2026

Year	Method			Total Removed	Cumulative Remaining
	LSLR Program	Small Diameter Water Main Replacement	Operations		
2016 - 2019	4925	277	984	6186	6614
2020		450	175	625	5989
2021		1100	150	1250	4739
2022		900	125	1025	3714
2023		1050	100	1150	2564
2024		825	75	900	1664
2025		800	50	850	814
2026		750	50	825	0

In order to replace the remaining lead service lines under the annual SDWMR program, it will be necessary to increase the number of miles of main replacement per year. Table 2-8 presents the current and "accelerated" SDWMR program currently under consideration by the Authority. The accelerated program is expected to be needed to effectively eliminate the remaining lead service lines from the system.

Table 2-8
Current and Proposed Accelerated SDWMR Program

Year	Existing Budgeted SDWMR Program*	Accelerated SDWMR Program
2019	\$10,880,000	-
2020	\$54,340,000	-
2021	\$54,630,000	\$114,770,000
2022	\$57,170,000	\$120,060,000

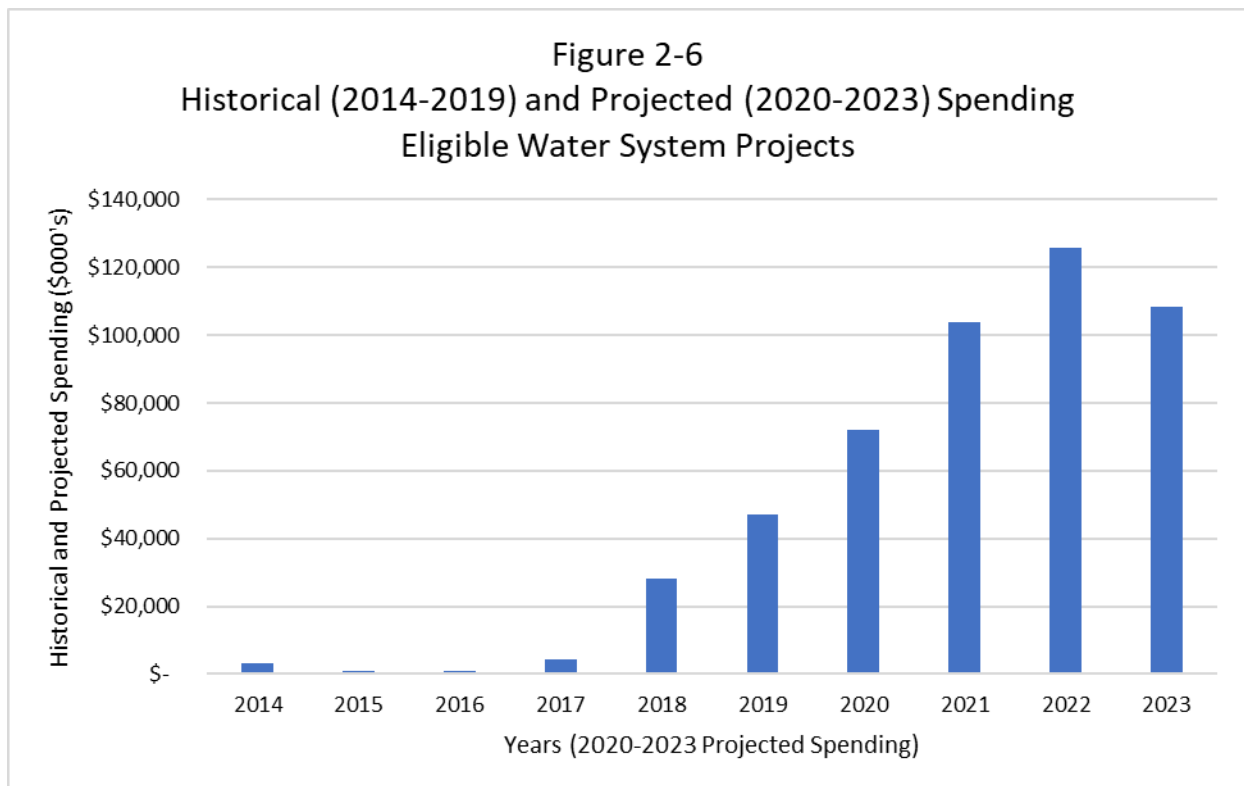
2023	\$58,880,000	\$123,610,000
2024	\$60,700,000	\$127,390,000
2025	\$61,570,000	\$129,160,000
2026	\$63,370,000	\$133,020,000

*Costs shown in Table 2-6 (previously presented) for years 2022 through 2024 represent incurred expenses and not the total budget of the project.

2.6.2 Acceleration of Other Water System Improvements

In addition to the accelerated LSR program described in section 2.6.1, the Authority is working to accelerate the replacement of small diameter water mains as described in section 2.3. Additional infrastructure replacements and rehabilitations will be identified and implemented on a case by case basis. Figure 2-6 shows the historical spending on water system improvements presented previously plus the proposed spending based on the information presented herein.

PWSA also has identified a number of critical water system deficiencies in water treatment and related improvements. Many of these projects have been mandated to be completed within specified dates. These projects represent high risks to the provision of adequate and fully compliant drinking water supply. These projects' scope and completion schedule are memorialized in a September 2019 Consent Order and Agreement with the PADEP.

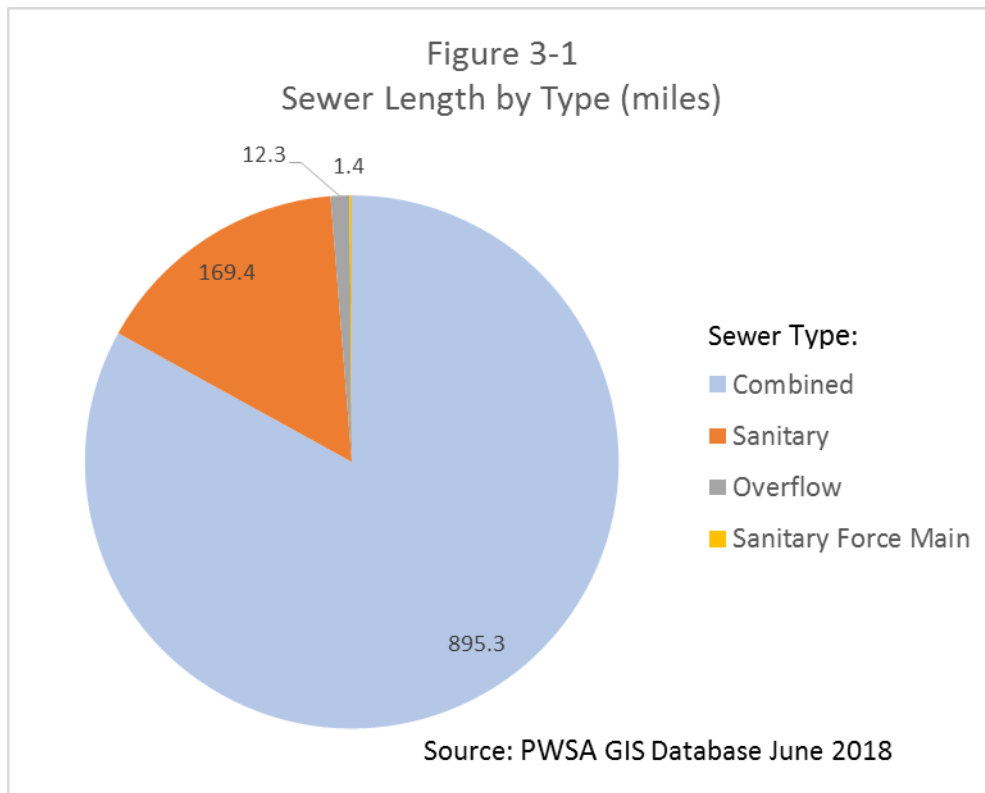


This graphic does not include the cost of the PADEP Mandated water treatment and supply projects incorporated into a September 2019 Consent Order and Agreement, to be completed in the next 4 years.

3 SEWER SYSTEM

3.1 General Description of Eligible Sewer Property

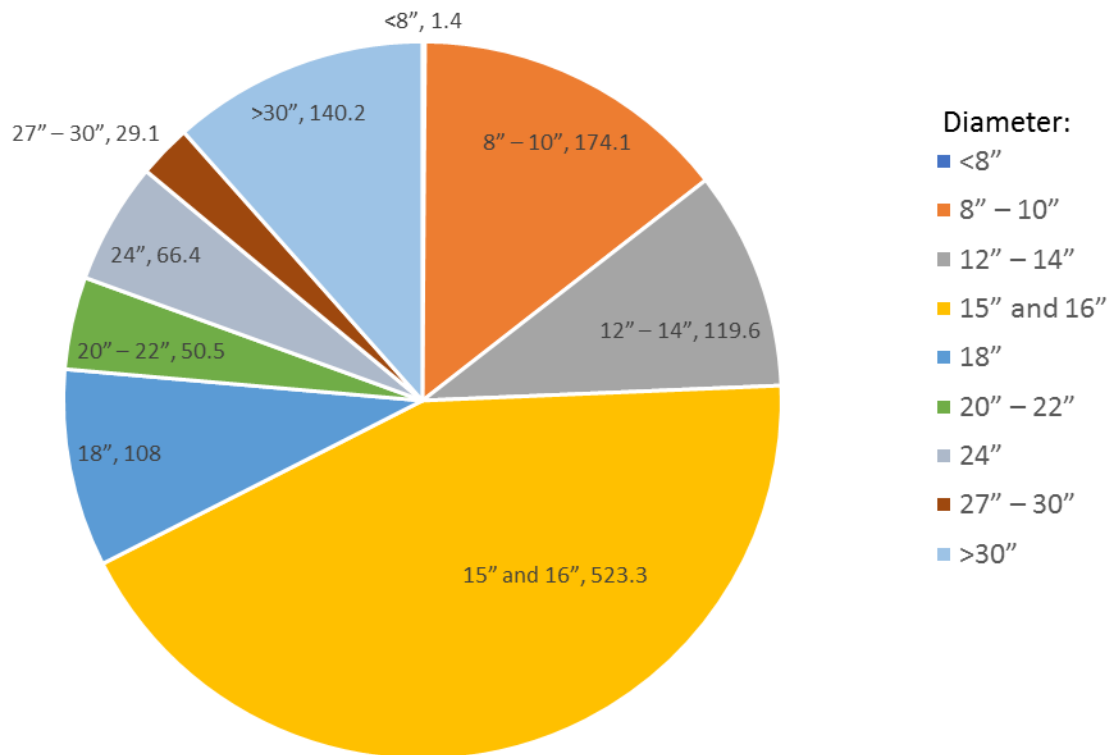
The eligible property associated with the Authority’s sewer system consists of approximately 1,080 miles of sewer comprising separate sanitary and combined sanitary and storm, overflows, and sanitary force mains as shown in Figure 3-1. Approximately three-quarters of the Authority’s sewers are combined (pipes that carry both sanitary and storm flows).



The eligible property within the system includes lift stations (also referred to as pump stations). The Authority operates and maintains four sanitary sewer lift stations: Browns Hill Road Pump Station, Evergreen Road Pump Station, Mifflin Road Pump Station, and Rodgers Street Pump Station. The Browns Hill Road Pump Station has two constant speed pumps/motors each rated at 250 gallons per minute (gpm) at 55 feet total dynamic head (TDH). The Evergreen Road Pump Station has two constant speed pumps/motors each rated at 150 gpm at 55 feet TDH. Mifflin Road Pump Station has two constant speed pumps/motors each rated at 500 gpm at 88 feet TDH. The Rodgers Street Pump Station has two constant speed pumps/motors each rated at 1,000 gpm at 95 feet TDH.

Sewer pipe sizes range from less than 8-inch diameter to greater than 30-inch diameter (up to 120 inch diameter), as shown in Figure 3-2, which includes the lengths of storm sewers because separate sizes for sanitary, combined, and storm are not presently available.

Figure 3-2
Sewer Length (in miles) by Diameter*

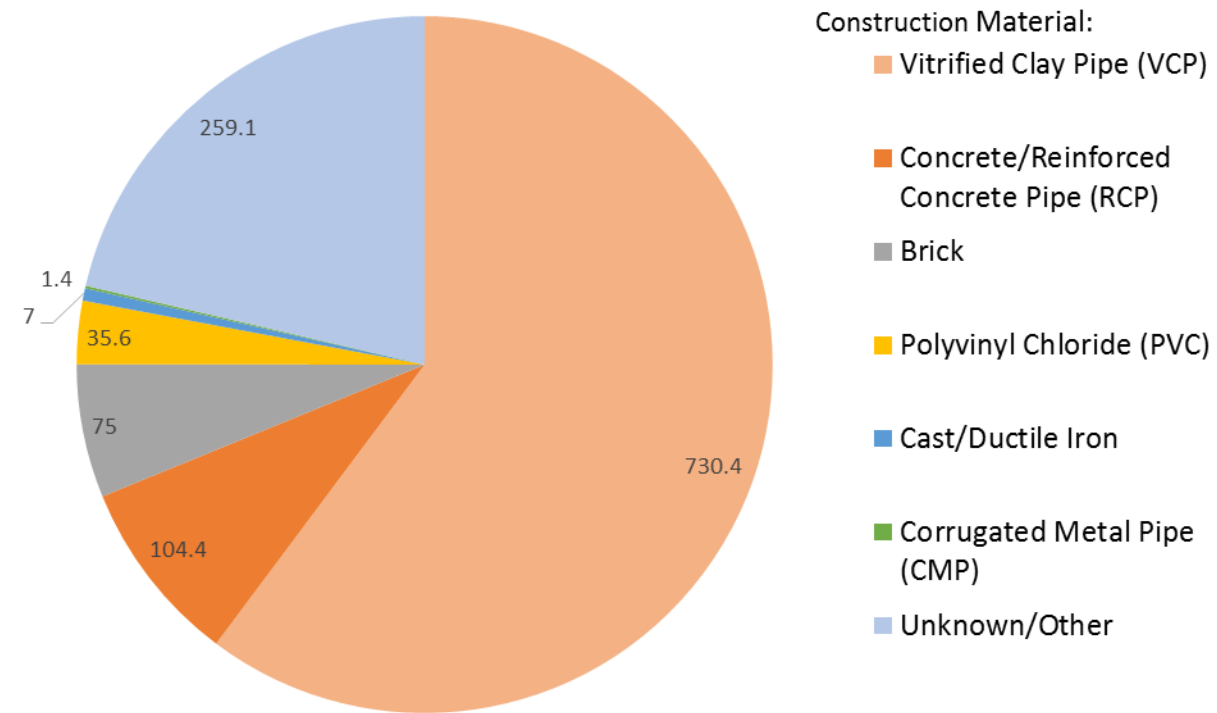


*includes storm pipe

Source: PWSA GIS Database June 2018

As would be expected of an older sewer system, a majority of the sewers are composed of Vitrified Clay Pipe (VCP), as shown in Figure 3-3.

Figure 3-3
Sewer Length (in miles) by Material of Construction*



*includes storm pipe

Source: PWSA GIS Database June 2018

The sewer system contains approximately 29,000 manholes including 98 CSO diversion chambers. Manhole types include standard, lamp hole, equalization chamber, and flow dividers. The total does not include 49 manholes with sewer use defined in the GIS system as “undefined”; these “undefined manholes” could be private manholes since no record drawings have been located to date to confirm ownership. The system also contains 38 CSO.

As noted above, the Authority’s GIS database is being updated constantly, and not all eligible property is currently “logged” into the system. The data upload to the GIS system is an on-going effort, and the statistics reported above may change as a result of ongoing system data review and “clean-ups”.

3.2 Eligible Sewer System Property to be Improved

Recognizing the need for continual renewal of the Authority’s sewer collection and conveyance system to maintain quality and reliable service to its customers, the Authority has established three annual rehabilitation and pipe reconstruction project types to accelerate the renewal of its system: Sewers Under Structures, Small Diameter Sewer Rehabilitation, and Large Diameter Sewer Rehabilitation. Sewers Under Structures will target existing sewer infrastructure located under or adjacent (within 20 feet) to buildings, bridges, or railroads or located on steep slopes. Small and Large Diameter Sewer Rehabilitation projects utilize cost effective trenchless technologies to restore the structural integrity,

reduce root intrusion, and reduce infiltration and inflow on mains less than 36-inch in diameter and 36-inch diameter or greater, respectively.

Little sewer system investment other than annual repair construction contracts and a few miles of sewer separation has been made to the PWSA sewer system in the past 20 years. To accelerate the sewer system CIP investments, the Authority has initiated the aforementioned sewer renewal contracts in 2018. Sites were selected based on the asset's physical condition, location, and/or regulatory compliance obligations. The projects are summarized in Table 3-1.

Table 3-1
Selected Sewer System Eligible Property Locations for Rehabilitation or Replacement

Year and Project Types	Sewer System Eligible Property Description
2020 Sewers Under Structures	<p><u>Contract 1</u></p> <ul style="list-style-type: none"> Carroll Street (A-23): 24" VCP line running from the intersection of Torley and Cullen Street to Carroll Street and the 15" VCP running from Comrie Way to Carroll Street. Approximately 440 linear feet planned for rehabilitation or relocation. All work on this site must be coordinated with Water Main Replacement work. Freeland Street (S-32): 15" and 20" VCP sewer lines running in Freeland Street between Asteroid Way and Knox Avenue as well as the 15" line running from Freeland Street to Loyal Way. Approximately 1,225 linear feet planned for rehabilitation or relocation. Also requesting condition verification of 15" sewer line running from Lillian to Freeland Street which was previously lined. Seaton Street (S-15): 8" VCP running behind 1720 – 1756 Seaton Street. Approximately 545 linear feet planned for rehabilitation or relocation. <p><u>Contract 2</u></p> <ul style="list-style-type: none"> 28th Street (A-20) 18" VCP line running from the intersection of 28th and Brereton Street to the connection with the 36" Brick Sewer near the Busway. Approximately 300 linear feet planned for rehabilitation or relocation. Bennett Street (A-42) 24" VCP line running from the intersection of N Dallas Avenue and Formosa Way to the connection with the 57" Brick Sewer near Bennett Street. Also includes 42" Brick line running from the intersection of Kelly and N Murtland Street to the connection with the 57" Brick Sewer near Bennett Street. Approximately 1,130 linear feet planned for rehabilitation or relocation.

Year and Project Types	Sewer System Eligible Property Description
	<ul style="list-style-type: none"> Flemington Street (M-29) 20" VCP line running from 1075 Flemington Street to a manhole in Beechwood Boulevard. Also includes 15" VCP line running behind 1025 – 1075 Flemington Street. Approximately 850 linear feet planned for rehabilitation or relocation. <p>Washington Landing (A-62) 15" DIP (Pipe size to be confirmed). Running from the southmost point on Washington's Landing to ALCOSAN Diversion Chamber A-62. Approximately 280 linear feet planned for rehabilitation or relocation.</p>
2020 Large Diameter Sewer Rehabilitation	<ol style="list-style-type: none"> Heth's Run/Zoo –Trenchless rehabilitation of a 48-inch and 60-inch combined trunk sewer, approximately 1,380 linear feet. East Busway– Trenchless rehabilitation of a 96-inch combined trunk sewer, approximately 157 linear feet.
2020 Sewers Under Structures	<p><u>Contract 1</u></p> <ul style="list-style-type: none"> Carroll Street (A-23): 24" VCP line running from the intersection of Torley and Cullen Street to Carroll Street and the 15" VCP running from Comrie Way to Carroll Street. Approximately 440 linear feet planned for rehabilitation or relocation. All work on this site must be coordinated with Water Main Replacement work. Freeland Street (S-32): 15" and 20" VCP sewer lines running in Freeland Street between Asteroid Way and Knox Avenue as well as the 15" line running from Freeland Street to Loyal Way. Approximately 1,225 linear feet planned for rehabilitation or relocation. Also requesting condition verification of 15" sewer line running from Lillian to Freeland Street which was previously lined. Seaton Street (S-15): 8" VCP running behind 1720 – 1756 Seaton Street. Approximately 545 linear feet planned for rehabilitation or relocation. <p><u>Contract 2</u></p> <ul style="list-style-type: none"> 28th Street (A-20) 18" VCP line running from the intersection of 28th and Brereton Street to the connection with the 36" Brick Sewer near the Busway. Approximately 300 linear feet planned for rehabilitation or relocation. Bennett Street (A-42) 24" VCP line running from the intersection of N Dallas Avenue and Formosa Way to the connection with the 57" Brick Sewer near Bennett Street. Also includes 42" Brick line running from the intersection of Kelly and N Murtland Street to the

Year and Project Types	Sewer System Eligible Property Description
	<p>connection with the 57" Brick Sewer near Bennett Street. Approximately 1,130 linear feet planned for rehabilitation or relocation.</p> <ul style="list-style-type: none"> Flemington Street (M-29) 20" VCP line running from 1075 Flemington Street to a manhole in Beechwood Boulevard. Also includes 15" VCP line running behind 1025 – 1075 Flemington Street. Approximately 850 linear feet planned for rehabilitation or relocation. <p>3. Washington Landing (A-62) 15" DIP (Pipe size to be confirmed). Running from the southmost point on Washington's Landing to ALCOSAN Diversion Chamber A-62. Approximately 280 linear feet planned for rehabilitation or relocation.</p>

These and the additional projects projected to be implemented throughout the 5-year duration of this LTIIIP are identified and described in Table 3-2 located in Appendix B.

3.3 Future Sewer Rehabilitation Prioritization Approach

In order to cost-effectively prioritize future sanitary sewer rehabilitation, the Authority will employ a risk-based approach to prioritize the neighborhoods and/or pipe segments that are included in the annual projects, where risk is defined as:

$$\text{Risk} = \text{Likelihood of Failure} \times \text{Consequence of Failure} \times \text{Redundancy}$$

To accomplish this cost-effective prioritization, the Authority plans to perform a GIS desktop analysis, which is anticipated to be completed by the first quarter of 2021. This analysis will assign a risk score to each pipe segment within its system when complete. Additionally, to reduce the impact to customers and save on mobilization and demobilization costs, projects will be formed by grouping prioritized assets by geographic proximity and similar risk rankings.

3.3.1 Likelihood of Failure

The likelihood of failure component represents the probability that the asset will fail based on the asset's physical condition. This score will be determined by reviewing internal, closed-circuit television (CCTV) inspections coded using the National Association of Sewer Service Companies (NASSCO) Pipeline Assessment Certification Program (PACP), which is an industry standard for performing condition assessments. Table 3-3 lists and describes the condition scoring for sewers in the wastewater collection system.

**Table 3-3
Likelihood of Failure Scoring**

PACP Grade	Description	General Guidelines for Timing of Pipe Failure
1	Minor Defects	Failure unlikely in the foreseeable future
2	Defects that have not begun to deteriorate	Failure unlikely for 20 years
3	Moderate defects that will continue to deteriorate	May fail in 10 to 20 years
4	Defects that will become a grade 5 in the foreseeable future	Likely to fail in 5 to 10 years
5	Defects requiring immediate action	Has failed, or will fail in less than 5 years

For assets without existing inspection data, desktop assessments using operations and maintenance history (if available), material, and date of construction will be used until condition assessment data is available. Collapses or other significant defects that cannot be rehabilitated using trenchless technology on critical pipe segments (e.g. deformation) will be repaired or replaced using open-cut methods as soon as possible using the Authority's annual urgent or reconstruction contracts. These segments will be assigned a condition score of 6.

3.3.2 Consequence of Failure

The consequence of failure (CoF) score represents the direct and indirect impact to the customers and environment if the asset fails; it will utilize the following "Triple Bottom Line" criteria:

- Financial impact resulting from the need to conduct an urgent repair: this accounts for the relative cost to repair failures (i.e. depth, pipe size, and accessibility) and any fines or other regulatory costs incurred due to a failure.
- Societal impact resulting from the loss of service of the asset: this takes in account the number of customers affected by the failure, the type of customers affected (i.e. hospitals, schools, etc.), and the location of the asset.
- Environmental impact resulting from any discharges: this accounts for the relative impact to the surrounding environment if a failure leads to a discharge.

An overall consequence of failure score will be calculated (see Table 3-4) as a weighted average of all the individual consequence of failure factors and the maximum score will be 6. The weighting factors will be 0.25 for each financial and social criterium and 0.50 for environmental criteria. Proposed weightings and ranges presented may be adjusted as the systemwide analysis is performed.

**Table 3-4
Consequence of Failure Scoring**

CoF Factor	Description	CoF Score	Triple Bottom Line Criteria
Diameter	Less than 10"	1	Financial, Social
	≥ 10" < 15"	2	
	≥ 15" < 24"	3	
	≥ 24" < 36"	4	
	≥ 36" < 60"	5	
	≥ 60"	6	
Depth	Less than 6'	1	Financial, Social
	≥ 6' < 10'	2	
	≥ 10' < 14'	3	
	≥ 14' < 18'	4	
	≥ 18' < 24'	5	
	>24'	6	
Location	Unpaved Road	1	Financial, Social
	Minor Local Road	2	
	Major Local Road	3	
	Collector Road	4	
	Arterial/Building/Pool	5	
	Highway/Waterway/Railroad	6	

CoF Factor	Description	CoF Score	Triple Bottom Line Criteria
Distance from Environmentally Sensitive Features	150 LF or more	1	Environmental
	100 - 150 LF	2	
	75 - 100 LF	3	
	50 - 75 LF	4	
	25 - 50 LF	5	
	Less than 25 LF	6	
Distance Between Downstream Pipe to a Service Lateral for Customer with High Importance	20,000 LF or more	1	Social
	15,000 – 20,000 LF	2	
	10,000 – 15,000 LF	3	
	5,000- 10,000 LF	4	
	1,000 – 5,000 LF	5	
	Less than 1,000 LF	6	
Accessibility of Pipe	On Right-of-Way - No Traffic Control	1	Financial
	On Right-of-Way - Traffic Control	2	
	On Public Land with Vehicle Access	3	
	On Public Land without Vehicle Access	4	
	On Private Lands with Vehicle Access	5	
	On Private Land without Vehicle Access	6	

3.3.3 Redundancy

The availability of redundant assets mitigates the consequences of asset failure and overall risk. Redundancy scores will range from 0.1 for complete redundancy to 1 for no redundancy. In general, the redundancy factor for most of the wastewater collection system will be 1 because gravity sewer systems do not typically have redundancy in their design. However, for specific assets known to have alternate flow paths where diversion can occur with no system impacts, redundancy will be factored into the risk calculation.

In summary, the proposed risk scoring methodology is summarized in Table 3-5.

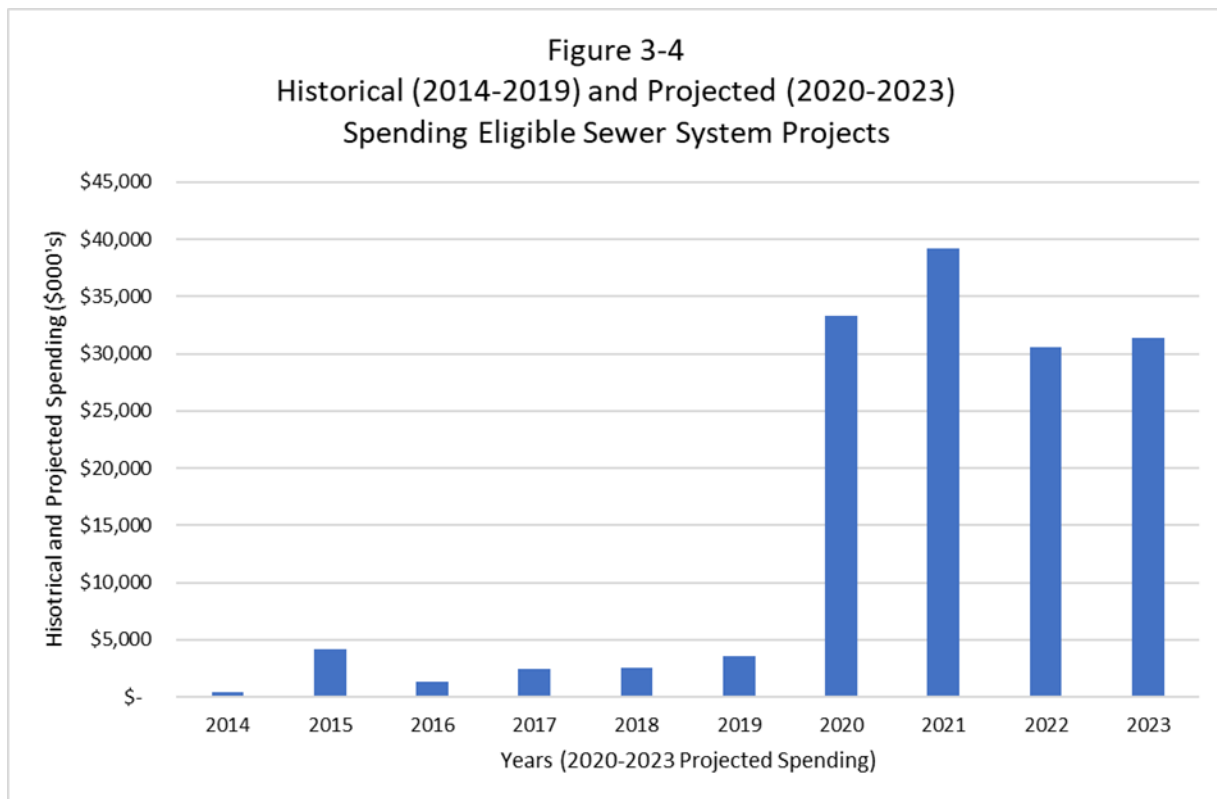
Table 3-5
Risk Scoring Methodology

Criteria	Scale (Best Case → Most Risk)
Likelihood of Failure	1 (almost new) to 6 (failed)
Consequence of Failure	1 (least critical) to 6 (most critical)
Redundancy	0.1 (complete redundancy) to 1 (no redundancy)
Risk	1 (least risk) to 36 (highest level of risk)

3.4 Initial Planned Repair and Replacement Schedule and Projected Annual Expenditures

Table 3-6 in Appendix B identifies the costs associated with the projects for each year of the project schedule (2018, 2019-2023), organized into the following major project categories:

- Small-Diameter Sewer Rehab
- Large-Diameter Sewer Rehab
- Sewer Reconstruction (Annual Indefinite Delivery Indefinite Quantity (IDIQ) Contract)
- Sewers Under Structures



3.5 Acceleration of Sewer Projects

Figure 3-4 shows past and projected spending on eligible sewer system projects for the period 2014 through 2023. The value for 2015 reflects projects which were funded through a combined capital and operations budget, which accounts for its disproportion to years prior and after.

4 WATER/SEWER (HYBRID) PROJECTS

4.1 General Description of Eligible Hybrid Projects

Water/Sewer (Hybrid) projects are defined as those which contain both water and sewer elements or sanitary and storm sewer elements and are not practicable to segregate those project costs associated with water and those project costs associated with sewer. Table 4-1 in Appendix B describes the three eligible properties projects which we have categorized as “Hybrid” as follows:

- **Utility Cost Shares:** Infrastructure replacement which is carried out as a result of projects in the vicinity by other agencies or utilities.
- **Smallman Street Reconstruction:** Sewer separation and water main replacement in association with local redevelopment.
- **Maytide Storm and Sanitary Sewer System Improvements:** reconstruction and realignment of local storm and sanitary sewers.

4.2 Initial Planned Repair and Replacement Schedule and Projected Annual Expenditures

Table 4-2 in Appendix B identifies the costs associated with the Hybrid Eligible Properties Projects for each year of the project schedule.

5 SUMMARY OF PAST AND PROJECTED CAPITAL SPENDING

Table 5-1 shows the past and projected spending for water, sewer, and hybrid projects, all previously described in this LTIP. These data are graphically displayed in Figure 5-1 in Appendix A. The projected spending (2020 – 2023) for all eligible property types is approximately \$551.8 million.

Table 5-1
Historical (2014-2019) and Projected (2020-2023) Capital Spending
(in Thousands of Dollars)

Fiscal Year	Total Capital Spending	Water Projects	Sewer Projects	Hybrid Projects	Total Eligible
2014	\$9,991	\$3,177	\$400	\$1,983	\$5,560
2015	\$41,502	\$998	\$4,186	\$10,040	\$15,225
2016	\$29,903	\$894	\$1,305	\$5,777	\$7,976
2017	\$30,283	\$4,331	\$2,476	\$8,330	\$15,137
2018	\$69,200	\$28,002	\$2,599	\$5,547	\$36,148
2019	\$107,966	\$47,071	\$3,586	\$73	\$50,730
2020	\$204,264	\$71,887	\$33,283	\$500	\$105,670
2021	\$330,000	\$103,975	\$39,142	\$3,000	\$146,117
2022	\$305,000	\$125,908	\$30,551	\$3,000	\$159,459
2023	\$265,000	\$108,401	\$31,392	\$750	\$140,543

6 COST EFFECTIVENESS AND EVALUATION METRICS

The increase in the volume of capital project delivery planned for the next 5 years demands an ever-increasing level of management excellence to achieve the efficiencies necessary to meet the challenge of adhering to project budgets and schedules. The Authority has for the past 30 years run an engineering and construction department comprised of Authority employees and contracted professionals. The Authority staff and its outside consultants and contractors will continue to work seamlessly as a unit in terms of controlling and monitoring all aspects of the capital program. Impediments to the attainment of the aggressive construction program proposed must be identified in advance and when barriers to the efficient attainment of pre-established budget and schedule goals are identified, they must be resolved quickly and consistently. This approach will ensure the success of the program, measured in large part by cost savings.

The rehabilitation and replacement of water mains, for example, will undoubtedly result in a reduction in non-revenue water losses and future main breaks. However, there is a need for a comprehensive and systematic approach to the delivery of the accelerated capital improvements program. The Authority has implemented (and is continuously improving) a number of tools which will ensure the cost-effective and efficient planning, design, procurement, construction, and close-out of projects. These tools include the e-Builder project management information system, the Program Management Plan (PMP), and contractor procurement process. All three tools are described in more detail below. In addition, cost-effectiveness will be ensured by the selection of the appropriate construction techniques (such as trenchless construction) during the planning stages of a project.

6.1 e-Builder Project Management Information System

e-Builder is a robust, web-based project management information system. It allows, through specifically defined permissions, both internal and external project managers to manage their project budgets, schedules, change orders, contractor/vendor invoice payments, and other critical project related activities in one centralized location. In addition, this system allows the Authority to better manage the interactions and integral project finances for multiple, related projects at a program level.

e-Builder was initiated by the Authority in July 2015. e-Builder has allowed the establishment of customized processes that best fit day-to-day project management activities. The e-Builder system allows Authority personnel at all levels to access data and tangible project status reports for the project. Dashboards have been developed for internal and external project participants, allowing the e-Builder users the ability to manage, monitor and quickly identify:

- Bottlenecks within the processes
- Staffing needs
 - Capital and operations expenditures
 - Change orders
 - Schedule adherence and deviations throughout the project cycle

Over the past 3 years, the e-Builder system has helped move the Authority from a manual paper-based management system to an electronic, collaborative, web-based system that captures critical project related data and information in one centralized repository. The Authority has designed their system to allow access by contractors and consultants who use e-Builder for a number of critical project processes, such as to process payments electronically, upload 30%-60%-90% and final design documents, and house daily site reports and construction photos/videos. e-Builder provides a vehicle for continuous communication between primary project participants.

Since the implementation of e-Builder, the Authority has experienced measurable results and improvements. For example:

- Reduction in the magnitude of change orders from 35% of original project budget to below the industry average of 5%
- Reduction in the time for vendor invoice approval from (on historic average) 45-60 days to 35 days
- Reduction in the time for contractor payment application approvals from on historic average) 45-60 days to 38 days
- New contractors bidding work for the first time
- Increased Women-owned Business Enterprise (WBE) participation nearing the Authority goal of 7% compared to past participation which was historically documented around 2%

The Authority will continue the development and refinement of its e-Builder system to accommodate the expansion of the capital improvement program.

6.2 Program Management Plan

A Program Management Plan (PMP) is being finalized to facilitate the incorporation of best industry practices to optimize project planning and delivery at the Authority. Standard processes and procedures supported e-Builder represent many of the documented primary tools outlined in this document. The PMP is a “living” document and is being updated on a continual basis to encourage uniformity in staff practices, record retention, and contracting practices.

The PMP describes the processes, activities, and procedures that the Authority’s project management and administrative staff will use to organize to manage the increased workload outlined in the CIP and to efficiently and effectively maintain its water and sewer utility systems. The draft table of contents of the PMP is contained in Appendix E of this LTIIP.

Development and use of standard processes and procedures by Authority staff assures the consistency, quality, and timeliness of actions taken by project personnel in the delivery of critical capital projects. Improved interfaces between Authority personnel and external resources improves the ability to deliver projects on time and within budget, while working to meet or exceed pre-established project performance goals.

The PMP provides a living template to successfully and sustainably manage and deliver the Authority's CIP projects. It is designed to provide a blueprint to track project activities and program progress against compliance obligations and other benchmarks, thus giving the Authority an accurate "finger on the pulse" for each project, and in aggregate, for each program. Its implementation outlines the processes to encourage timely and appropriate corrective action. It will also help the Engineering and Construction Department improve consistency and quality in many areas, such as data management, contract language, policies and procedures, standardized forms and formats, interpretation, design standards, analysis, problem resolution, change management, construction management, documentation, and more, all of which lead to better performance and productivity.

The PMP establishes the framework for a high-level overview of the processes inherent in the successful development, planning, design, and construction of a project. In addition, it includes core functional procedures to be performed on a routine basis. Procedures were developed by interviewing Authority staff and consultants with specific hands on per topic covered, and the development of workflows to optimize the steps associated with specific processes.

The PMP includes a number of tools, forms, and references to further support project activities. These tools provide the Authority with guidance, information, and supplemental materials for better comprehension and for use in conjunction with the procedures. These PMP materials are intended to keep the processes and procedures as concise as practical and limit the need to revise procedures when the tools and forms are revised.

6.3 Cost-effective Design, Project Management and Construction

6.3.1 Design and Constructability Reviews

In general, a majority of the Authority's construction projects are designed by contracted professional engineering consulting firms. Therefore, the Authority employs a robust review process that includes input from the Authority's engineering department and operations staff as well as independent third-party reviewers.

The design Scope of Work (SOW) generally requires the consultant to undertake an initial study or evaluation phase to document the detailed design in a Technical Design Memorandum (TM), or Basis of Design Report (BODR), depending on the complexity of the project. These documents are reviewed by the Authority and an independent third-party reviewer (typically a third-party engineering consulting firm). Following acceptance of the TM or BODR, the consultant will be notified to advance (or modify) the detailed design.

Independent reviews of the detailed design are typically performed following the completion of the 30%, 60% and 90% design phases. These technical reviews are completed prior to the issuance of final Contract Documents by the Authority. Constructability reviews, including a detailed evaluation of the cost estimate, are performed at a minimum at the 60% and 90% phases, and at 30% for more complex projects. Submittals include contract drawings developed at the appropriate level of detail, draft specifications incorporating the Authority's standard specifications, updated construction cost (to a level of refinement in accordance with the Association for the Advancement of Cost Engineering (AACE)), an update on the required permits for the project, and an update on the comments and actions from the previous reviews.

The overall design review process is designed to ensure that the project meets the Authority's goals and objectives, the implementation schedule is being maintained and the budget is being monitored to ensure it is within available project funding. The review process also includes stakeholder input and interaction, again depending on the type of project and potential impact on the community, other utilities, or concerned citizen groups.

As part of the Authority's design review, appropriately selected subject material experts (SME's) are included in the process to incorporate lessons learned from similar projects. Reviews are performed with the focus on potential areas of contract claims, design recommendations to improve the overall construction process, and avoidance of potential conflicts within the documents.

In addition to these design reviews, the Authority also has an internal post-construction review process that obtains feedback on recently completed construction projects to solicit lessons learned or construction techniques that can be utilized on future contracts to save money or avoid costly construction claims.

6.3.2 Project Audits

As the Authority continues to accelerate the CIP, staff are encouraged to identify potential obstacles and challenges in advance and mitigation actions before issues are encountered and cause project delays. By conducting internal project audits with project managers with specific "look ahead" and "cost to complete" reviews, the Authority will be alerted quickly and will be able to take action. The project audits are intended to review significant project milestones, final deliverables, and current project status. A workflow process has been developed in e-Builder called "PWSA Project Audit Process (PPA)", which will house all the talking points and discussions that take place during the project audit meeting. This information will then be summarized in a report used to brief the Director of Engineering and Construction.

To date, a number of valuable "Lessons Learned" have been identified and shared with staff to provide the basis for improved the performance of future projects. The Authority will build upon the aforementioned "lessons learned" which will result in the development of:

- Strategies which will increase the successful outcomes of future projects
- Project success criteria which will include schedule, budget, and customer and stakeholder satisfaction metrics
- Change management success criteria which will include metrics associated with staff involvement, public interaction, and change transition

6.4 Contract Bidding Procedures

As a Municipal Authority, the Authority is required to publicly bid construction contracts and the purchase of goods in accordance with Chapter 56, PL 287. The Authority has a long history of successfully bidding such services. Generally, large improvement projects such as pump stations or storage facility upgrades would be bid as one construction project with multiple contracts. The Authority is required to follow the Separations Act 53 P.S. 1003 and 71 C.S.A. 1618 which requires the use of a separate contract for plumbing, heating & ventilating, and electrical work. In addition, the

Authority has established an Equal Opportunity Contracting (EOC) Program effective December 15, 2017. The EOC Program specifics are available on the Authority's website. Potential vendors and contractors are encouraged to review the EOC Program information that defines the participation goals for the engagement of currently certified minority, women and service disabled veteran business contractors. The bidders are required to submit the package of certifications included with the contract documents relating to Equal Employment Opportunity.

For linear projects such as water main replacements, sewer rehabilitation, and hydrant and valve replacement contracts, the projects are organized into large enough contracts that provide economic incentive for contractors to bid.

The Authority has pre-qualified several engineering firms to provide expedited design phase services. These firms are selected based on the anticipated scopes of work and the firm's qualifications to complete the work, including availability and experience of the staff, proximity of the staff to the City, and other parameters. Firms are selected to perform expedited designs of water main and sewer line rehabilitation and/or replacement, green stormwater infrastructure projects, and other infrastructure improvements. As a project scope of work is developed, a request for proposal (RFP) is prepared by the Authority and issued to several (pre-qualified) on-call consultants. The RFP includes the detailed scope of work, contracting requirements, project delivery schedules and deliverables. For larger projects, separate RFPs are developed, and the engineering services are publicly advertised and a selection is made based on proposals submitted.

Given the need to ramp-up the overall CIP, the Authority is employing a Program Manager to assist the Authority's engineering department with executing the water, sewer and stormwater capital improvement program. The Program Management staff include embedded staff within the Authority's office working together with the Authority's staff as an extension of the engineering department. Depending on the nature of the project, or as specific engineering needs arise, additional technical resources will be engaged to cost-effectively and time-critically support the CIP.

7 WORKFORCE MANAGEMENT AND TRAINING PROGRAM

The Commission requires a utility to have a workforce management and training program adequate to ensure that the utility has access to a qualified workforce to perform work in a cost-effective, safe, and reliable manner. The Authority's proposed workforce management and training program is described below.

PWSA's primary Human Resource system is no longer supported by its developer. As a result, PWSA evaluated a number of vendor systems through an open procurement. Because of the need for a wide range of software capabilities, PWSA selected Ceridian's Dayforce program. Ceridian Dayforce is a single application that provides Payroll & Tax, Benefits, Human Resources, Talent Management, Workforce Management, Document Management and Analytics. By using the SaaS business model, Dayforce eliminates costly hardware, customization, and maintenance expenses-thus reducing the total cost of ownership. Key advantages are Single application, Compliance Automation, Speed, Accuracy, Self-Service and Configurability. Our Finance, IT and Human Resources expect to complete implementation of the application by the end of 2020.

7.1 Current and Proposed Workforce

7.1.1 Workforce Development

The challenges presented by an expanded infrastructure improvement program described in Section 5 of this LTIP are not insurmountable. The existing workforce at the Authority provides a solid foundation upon which to build the staff and skills it needs to become a high-performing organization.

The current and projected full-time workforce of the Authority is presented in Table 7-1. It is shown in the table that PWSA has added more than 115 employees since 2018 to address the range of operational, capital and other PUC mandated compliance responsibilities. In 2020, PWSA anticipates adding an additional 33 new employees to be hired to accomplish the work associated with the 2020 CIP and other PUC mandated compliance activities which include the eligible property infrastructure improvements. Onboard staff will be supplemented by contracted personnel as needed. PWSA intends to continue adding staff for Stormwater related activities, as well as additional Operations crews to construction water main and stormwater facilities as appropriate, in lieu of private contractors. The full extent of these additional workforce will depend upon their availability in the region, and the costs for contracted work compared to PWSA staff productivity.

**Table 7-1
Current and Projected Workforce**

Department	Current	2020 Budget	Proposed Additions	2023 Projected Total
Executive/Administration	6	6	0	7
Customer Service	65	65	4	69
Management Information Systems	13	13	6	19
Finance	14	21	0	21
Procurement	5	5	5	5
Human Resources	9	9	0	9
Legal	6	6	0	4
Warehouse	6	6	3	9
Public Affairs	11	11	1	12
Water Quality (Lab)	5	5	3	8
Water Treatment Plant	54	56	12	68
Water Distribution	131	140	6	146
Sewer Operations	32	34	10	44
Engineering & Construction	53	63	7	70
Environmental Compliance	5	6	2	8
Total	415	448	61	499

PWSA is not able to present an estimate of the exact number of contractors that may be needed at this time as that figure is dependent on both the progress of building an internal workforce and the final determination of actual needs and scope of the projects associated with the CIP. The objectives, commitments, outreach activities, and measures of success discussed below will enable PWSA to build a workforce to meet the needs of increased capital spending, as well as increased responsibilities to address PUC compliance requirements.

Success in hiring new permanent employees will depend upon the attainment of three major objectives:

1. Increasing our hiring effectiveness
2. Ability to attract staff domiciled in Pittsburgh or seek a Board exemption from Domicile policy
3. Enhancing workforce engagement and performance

Developing a strong workforce to meet the demands of planning, designing, and overseeing the construction of new and rehabilitated infrastructure and other capital improvement programs will rely upon identifying and hiring qualified applicants. To that end, the Authority is committed to:

- Implementing a new Human Resources Information System (HRIS). This system will include components to coordinate hiring of new staff.
- Reviewing and improving job postings and position descriptions. These activities will address the rapid expansion of staff, as well as modified and new job functions.
- PWSA's HR Department has been successful in hiring most of the required staff resources needed by the end of 2019. Currently, the Coronavirus has imposed a delay in many projects, so the need for all these staff will depend upon the implementation delays of the Capital projects, and operations improvements currently being implemented.
- PWSA has increased its compensation for many positions based upon the current salaries for similar positions in the region. The shortage of Water Treatment Operators and other key tradesmen appears to be an impediment to our expansion (and retention) of these staff positions. We believe that our current Compensation and Benefits are very competitive with both the Public and Private sectors competitors for professional resources.

The Authority has extended its outreach to industry publications, community partnerships, and other venues to reach prospective talent. We are specifically pursuing an effort to diversify our workforce to the greatest extent possible.

The Authority will use measures of success to determine the effectiveness of its hiring program:

1. Hiring response time: our goal will be that the average time to fill existing positions is less than three months from the date of the vacancy
2. Position vacancy rate: our goal will be an average vacancy rate of less than 3%
3. Achieve a workforce diversity which emulates the Allegheny County Region and the City of Pittsburgh to the greatest extent possible.

In terms of the second goal to enhance workforce engagement and performance, the Authority understands that increasing the efficiency and effectiveness of the organization requires engaged, developed, and high-performing employees. Growing and retaining the existing workforce will require the Authority to:

- Work cooperatively with unions to find and act on opportunities to increase workforce performance and effectiveness. In early 2020, local Union leadership has agreed to assist PWSA with specific training required for our laborers, equipment operators, electricians, plumbers and utility workers. Programs would be held at the Union's Training Facility at no cost to PWSA. Training can be coordinated such that new employees can be sent to training after hire.
- Complete a training program roadmap and inventory of the training requirements for all positions at the Authority. The Authority's training for 2019 is summarized in Table 7-2. Training for all staff has increased, and includes assisting the staff to acquire certifications and licenses

for their specialized capabilities (eg, Water Treatment Operators, Distribution System Operators, etc)

- Dedicate additional resources to training and development, as well as health, safety, and risk management. PWSA provides Safety Training by having a full time Contractor onsite, working with the Operation and Water Production Teams on a weekly basis. We are currently interviewing individuals to hire a permanent fulltime Senior Safety Manager.
- Establish and track productivity goals for work groups, where applicable. PWSA has implemented performance metrics for every group within the organization. More than 50 metrics are now being reported to the PUC on a quarterly basis.
- Develop a program to recognize high-performing employees. Since early-2019, PWSA has announced quarterly “Gold Water Drop” recognition of staff whose work performance showed efforts beyond the routine “Get Stuff Done” motto of the Authority. To date, more than 50 staff at all levels from all Departments have been so recognized.

Four measures of success will be used to determine effectiveness of its workforce engagement program:

- Training hours per year: with a goal of 20 hours per year per employee.
- Safety compliance: our goal will be to maintain a worker’s compensation experience modification rate of less than 1.0
- OSHA compliance: meet OSHA requirements
- Staff engagement survey: one every 3 years

The Authority will use a combination of internal and external resources to address the critical staffing needs associated with the infrastructure improvement program. The Authority will utilize Program Management support to execute the program with design and construction management services primarily provided by consultants. The Authority intends to cost-effectively increase staffing levels to ultimately assume the role of program management of the CIP.

7.1.2 Overcoming Workforce Challenges

In order for PWSA to implement the wide variety of improvements discussed in this LTIIP, PWSA must continue to restructure its resources, increase the number and expertise of Operations and Engineering Staff, and increase the number of available private consultants and contractors. PWSA has addressed its previous workforce challenges by stabilizing its senior and intermediate management leadership positions with experienced professionals, a union environment that limits workforce flexibility, residency requirements, limited availability of experienced water utility professional issues, and an aging workforce. PWSA has addressed these workforce challenges by focusing on its workforce objectives, adhering to its workforce commitments, extending its outreach activities, and evaluating its measures of success, as described in detail in Section 7.1.1. PWSA is committed to continuing these practices. PWSA’s success in overcoming its workforce challenges is demonstrated as follows:

- Operations has been reorganized. Four experienced (from Pennsylvania American Water Company) Senior Managers have been hired to manage the Operations field services teams.

Existing field service managers, three of whom have retired in the past 9 months, have been assigned to Valves, Hydrants and other related appurtenances management. The new senior management team is inculcating the staff with current water utility practices which is improving staff safety, productivity, and workforce job satisfaction.

- Operations is now realigning its resources to ensure that the key program metrics are being met, such as meter installation rates. A number of plumbers have been assigned to these tasks, and have increased the meter install rate from about 350 to 1000 per month. In addition, PWSA's meter installers do building reconnaissance to verify the plumbing system construction materials and existence of backflow preventers which facilitate the lead service line and water service backflow programs.
- Operations continues to hire laborers to the extent that they are available. Plumbers, electricians and other trades candidates have become limited because of the general economy, and hiring is impacted by the current domicile requirement.
- Engineering has been restructured under a full time Senior Program Manager, and a permanent Director of Engineering and Construction, as well as a Permanent Deputy Director, have been hired (most of these Senior Managers have been working for PWSA for several years as embedded consultants). Two new Senior Group Managers have been added to manage the Water and Stormwater programs. Four new mid-level project managers have been hired, as well as several additional consultants to manage the outstanding critical projects. Additional Project Managers are being hired as temporary staff as they become available to manage the existing projects.
- Consultants operate under On Call Services Agreements which permits a streamlined process of engagement for specific projects. These more than 20 selected consultants have ONCALL Services Agreements in several categories: Water, Wastewater, Stormwater, Water Treatment, among others.
- Construction Contractor outreach is being implemented to solicit contractors from outside the Allegheny County area. As project sizes increase, the interest by out of state contracting firms will be evident. Coordination of our work with the Allegheny County Contractor Association has led to interest from contractors who routinely serve PENNDOT and County projects. We will facilitate their ability to bid on PWSA work over the next year, as new work is being developed and designed.
- Metering activities have been accelerated by restructuring the process, and PWSA has now achieved a change out rate of more than 1000 per month. We continue to optimize the process and have demonstrated that the 10,000 meter per year rate can be exceeded.
- The metering of unmetered buildings began in December 2019. The initial assessment phase, during which consultants will determine what physical plumbing and other improvements are needed to install meters in unmetered public buildings. PWSA has identified 269 unmetered municipal services in its service area. As of March 31, 2020, 258 (96% of total) municipal properties have been inspected. So far, fifteen new meters have been installed in previously unmetered properties by PWSA personnel in properties identified as ready to meter. These initial studies are completed, PWSA will establish a formal schedule for the completion of

metering installations. PWSA has identified 495 flat rate services in its service area. As of March 31, 2020, 191 (43% of total) flat rate properties have been identified. (See Section 2 herein for additional information.)

The Authority continues to increase its staff and consultant resources to increase the rate of project implementation, at all levels and departments. The Authority is confident that the proposed schedules can be met, and possibly improved upon, dependent upon the ability of its Management Team to effectively add the additional resources. PWSA anticipates that its restructured Management Team in Engineering, Construction Management, Finance, Procurement, Operations, and Human Resources has the basic resources to implement the entire program, though we continue to add “ramp up” capacity as Authority takes on responsibilities for stormwater management and major systemwide upgrades. . The Authority is extremely sensitive to the need for its capacity increase to be sustainable, and is developing internal infrastructure and related systems, policies and procedures to continue project execution and delivery, including the hiring of more than 100 staff since 2018. The Authority continues to be deliberately cautious with the rate of personnel increase to ensure the sustainability and optimize performance of its organization.

PWSA continues to update its project schedules based upon the availability and capability of its workforce, and the commitments of its Consultants and Contractors. All schedules will account for the larger issues related to other mandates from Federal and State regulators, which could pre-empt some of PWSA’s commitments to the PUC.

7.2 Training Programs

7.2.1 e-Builder Training

The Authority’s Program Management Team with support of Authority Project Controls personnel have conducted e-Builder training for Authority personnel and others on the myriad elements of the system. The personnel trained and to be trained, and the topics of training, are shown in Table 7-2 (located in Appendix B). The Team provides one-on-one and group training and distributes reference materials to each participant. In addition to this formal training, “e-Builder Hot Topic Meetings” are held monthly. Typical topics include:

- Common issues of frequent occurrence that need to be addressed with project managers and others
- Feedback from project managers regarding any e-Builder issues
- Notification or updates related to existing internal processes or procedures
- Refresher training on any e-Builder module requested by Project or Program Manager
- Reinforcing rules to Project Managers and others;
- Introducing newly purchased e-Builder modules
- Notification on any e-Builder system updates or changes made by e-Builder
- Updates on Authority policies or procedures

7.2.2 Other Training

Other training programs are conducted by in-house and contracted personnel on such topics as hydraulic modeling, low impact development (LID), sustainability, and safety. Authority engineering staff are certified Sustainability Professionals (SPs) through the Institute for Sustainable Infrastructure training on the Envision rating system. Training programs associated with Health & Safety are described in Section 7.4 of this LTIP.

7.3 Construction Management and Inspection

The Authority utilizes subcontracted construction inspectors to provide numerous services during the installation of water mains, service lines, sewer lines, laterals and manholes in the collection system. The Authority maintains three inspectors on staff, is seeking additional inspection staff, and also utilizes qualified consultants to provide construction inspection services. These inspectors perform a wide range of services including the following tasks, as well as any other work that may be necessary to complete the construction activities.

- Monitor the installation of the water and sewer lines and appurtenances to confirm that they are properly bedded and installed in accordance with the Authority's specifications and/or Contract Documents
- Observe, perform testing to ensure that the new utilities meet specified performance requirements
- Monitor the pipe backfill for proper compaction in accordance with Authority's specifications and/or local municipal, county or PennDOT requirements
- Confirm that all materials such as pipe, fittings, hydrants, valves, service connections, backfill materials, etc. being used in the project meet the Authority's specifications
- Record the quantities of pipe and other materials installed
- Document the quantities of pipe and other materials, labor, equipment, etc., for accurate billing and payments
- Document all locations of pipe, valves, service connections, laterals, etc., for accurate mapping and record keeping
- Interact with City residents to coordinate water service line or sewer lateral installations, lessen the impact of the project and answer or address issues that may arise during the project
- Communicate with local businesses that may be impacted by the construction activities to ensure that service disruptions can be minimized to the greatest extent possible and service outages are minimized and do not disrupt business
- Coordinate contractors with school districts, various City agencies, and emergency services so that bus routes, trash pick-up, mail delivery, and emergency response are minimally impacted
- Monitor temporary restoration activities during construction to ensure that roads are restored to approved vehicular travel conditions and sidewalk areas are clear for pedestrians

- Monitor the final restoration required in projects to ensure that they are done in compliance with City of Pittsburgh, Allegheny County and/or PennDOT specifications
- Observe contractor's implementation of contractor safety plans and advise contractor of any observed conditions of imminent risks to public health or safety. Inspectors are authorized to advise supervisors of unsafe conditions and can shut down a project until an imminent danger situation is addressed.

7.4 Safety

In 2014, the Authority contracted with Compliance Management International (CMI) to assist in improving their current Health & Safety Program. CMI developed a Safety Improvement Plan (SIP) SIP to incorporate 12 key Health & Safety initiatives to expand and improve the overall program:

1. Written Safety Programs
 - a. PWSA currently has written safety policies/programs for Excavations, Confined Space, Personal Protective Equipment (PPE), Work Zone & Traffic Control, Blood Borne Pathogens, Chemical Right to Know, Control of Hazardous Energy (LOTO) as well as others in accordance with OSHA regulations.
 - b. The plans are reviewed annually and updated to reflect operational and procedural changes in accordance with the PWSA Health & Safety Strategic Plan.
2. Goals & Objectives
 - a. PWSA management establishes safety goals annually utilizing both leading and lagging indicators. The goals are related to injuries, accident investigations, training, inspections and reporting.
 - b. Goals are tracked monthly and reported to Executive Management to maintain communication and evaluate the need for immediate improvements.
3. Leadership/Management
 - a. In 2018 and 2019, PWSA conducted safety management and leadership training to all management staff. The training objectives were to provide all management with a current status of safety programs and goals and improve accident/incident investigations.
 - b. In 2019, the Management training included an interactive "Improving Safety Culture" component to further challenge managers in their role of safety.
4. Safety Training
 - a. PWSA has a well-established training program to educate employees on current PWSA safety programs as well as applicable regulatory requirements.
 - b. All employees receive an annual safety refresher training which covers OSHA mandated topics (e.g. fire extinguishers, confined space, LOTO authorized, chemical right to know, blood borne pathogens, etc.).
 - c. In 2019, PWSA completed Active Threats and Defensive Driver training for all employees.
 - d. A training matrix is utilized to ensure employees are provided necessary training for each job title/location.
5. Safety Inspections (Facility/Job Sites)
 - a. PWSA completes monthly inspections of each main facility via the Certified Safety Committee.
 - b. CMI completes an inspection of each PWSA facility semi-annually.

- c. In 2019, PWSA implemented a Field Observation Program to require front line managers to complete 50 field inspections/year.
 - d. PWSA is currently conducting Contractor Safety audits to ensure certain contractor protocols are being followed.
- 6. Safety Committees
 - a. PWSA currently maintains a “Certified” Safety Committee through the Pennsylvania Department of Labor. The committee consists of 14 members who represent various locations and departments in an effort to drive safety from “bottom-to-top.”
- 7. Job Safety Analysis (JSA)
 - a. PWSA has implemented a JSA program to ensure new/high risk tasks and processes are evaluated prior to commencing work.
 - b. JSA’s have previously been established for routine PWSA work and are reviewed with employees as necessary.
- 8. Accident Prevention/Incident Investigation
 - a. PWSA has an established Incident Investigation program and reporting process to ensure that all vehicle incidents, injuries and illnesses are reviewed.
 - b. Supervisors are trained on investigation procedures and a Root Cause Analysis is conducted by a designated team following each incident.
- 9. Corrective Action Tracking
 - a. All corrective actions resulting from the safety suggestion program, safety committee meetings, RCA’s, or other means are documented and tracked to completion utilizing an internal corrective action tracking system (CAT Tracker).
- 10. New Employee Orientation
 - a. PWSA has implemented a New Employee Orientation (NEO) program to ensure all new employees receive safety training within the first 10 days of hire. The training is specific to each job title/department.
- 11. Emergency Procedures
 - a. In 2019, PWSA updated the existing Emergency Action Plan (EAP) to establish facility specific plans for the main downtown office as well at the Water Treatment Plant.
 - b. The updated EAP added procedures for bomb threats, suspicious packages and active threats to already established emergency procedures.
- 12. Occupational Illness/Health
 - a. PWSA has completed two rounds of Industrial Hygiene monitoring for noise and various air constituents including chemicals utilized at the Water Treatment Plant as well as Crystalline Silica for field employees.
 - b. As a result of previous testing, a formal respiratory protection policy was developed and implemented and the Authority is continuing to upgrade equipment to provide better engineering controls.

Most of these trainings are provided on an annual basis as part of a full day safety refresher training. In May 2018, the Authority recertified over 80 employees as Certified Flaggers and another round of training for Competent Persons for Excavations certifications is being provided.

In 2016 and 2018, the Authority conducted Industrial Hygiene Monitoring including both air sampling and noise sampling. As a result of the monitoring program, the Authority implemented an Occupational Safety & Health Administration (OSHA)-compliant respiratory program. Safety metrics and injury trends are continuously tracked and improvements in the provision and use of PPE and other operational equipment to reduce employee risks and injuries have also been noted.

8 OUTREACH AND COORDINATION ACTIVITIES

8.1 Construction Coordination

The Authority has developed a coordination team with the City and its other utility members. In addition, PWSA is developing a robust GIS based data layer to communicate its plans to other utilities. At present, the critical coordination appears to be with the City, specifically the annual paving plans, and the local Gas Companies' piping improvements. Significant improvement is expected with the coordination between the PWSA and the City as a result of the City's hiring of a new Chief Engineer, and additional engineering staff, which has delayed coordination in the past. Additionally, PWSA has assigned specific utility coordination duties to a primary, internal utility coordination staff member within the Engineering Department.

Additionally, as previously indicated in this report, the Authority is currently updating its GIS to add water and sewer system data, evaluate and edit existing data, and refine its data retrieval processes in order to make the system more comprehensive, dependable, and easy to use. Annually, water and sewer system capital projects including replacements, rehabilitations, and repairs are selected and vetted to the Authority's engineering department before being prioritized for the coming budget year. As part of this process, the Authority solicits information from PennDOT, Allegheny County, homeowner's associations and other utilities as to their intentions to undertake paving and other public works projects during the budget year. The Authority attends monthly utility coordination meetings with the City's Department of Mobility and Infrastructure (DOMI) and other local utilities and coordinates construction and repair efforts when possible to avoid conflicts where overlapping work is identified. Additionally, PWSA will utilize resources, including the Pennsylvania 811 Coordination web service application, to identify opportunities for collaboration between projects and to meet the need for increased coordination with local utilities and local, state, county and city government agencies.

Whenever and wherever the Authority decides to undertake a pipe or manhole refurbishment project on a road pre-scheduled for paving, the project is coordinated with the State, County, City or appropriate municipality. The Authority works closely with the government agency to ensure that the design, permitting and construction of the Authority's infrastructure project will be completed in time to allow for the road to be paved.

In some cases, the government agencies will agree to postpone paving of its roads to match the Authority's completion of construction date, even if it extends into the subsequent year. Typically, where the Authority undertakes a project where paving has been pre-planned by the involved government agency, the Authority and its rate payers will benefit financially through the avoidance of road surface restoration.

The Authority will continue the proactive means to identify opportunities to coordinate pipe replacement and road paving.

8.2 Lead Service Line Replacement Program Outreach

In full support of the COA, the Authority has built a program to support its customers through the lead service replacement process. These outreach and communication efforts encourage property owners to participate in the current no-cost private lead service replacements offered in contract work areas. The

Authority is committed to these outreach efforts as a way of encouraging private line replacements and to reduce the number of partial (public-only) lead service line replacements.

The Authority's outreach and communications programs involve written communications with property owners and residents about the LSLR program and includes a letter describing the process, several information sheets and an agreement necessary for the Authority's contractors to perform the work. In addition to this initial information package, the Authority follows up with door hangers, service line work notices, 48-hour notices, post-replacement service line flushing instructions, test kit instructions and door-to-door canvassing of unresponsive customers. In addition to the written communications, the Authority also has a fully staffed Lead Help Desk team at the Authority's office. The Lead Help Desk team is responsible for the communication with the property owner and resident for the lead service line replacement program. Their primary goals are to inform property owners and residents about the program and reduce the number of partial lead service line replacements by encouraging eligible property owners to agree to private lead line replacements. Not only does the Lead Help Desk team respond to questions via their dedicated email and hotline, they also proactively call property owners in the work order areas to follow-up on unsigned property owner agreement forms and to schedule pre-construction coordination meetings.

The Authority also employs Field Liaisons who are responsible for coordinating lead service line replacement work between the Authority's contractors, property owners and often tenants. Field Liaisons contact each property owner to help them understand the replacement process and potential impacts of the work, and to encourage private property owners who have not responded to communications from the Authority's Lead Help Desk. Their presence on-site also helps assure that the Authority's contractor's meet all quality assurance and regulatory requirements such as providing NSF-approved filters and lead water test kits.

Other LSLR outreach includes presentations at community meetings within the work areas, advertisements in neighborhood publications, press releases (and resulting press coverage) of work areas, social media posts, collaboratively working with City Councilors regarding work done in their district, construction signage detailing the work and weekly updates concerning streets where work is occurring.

8.3 Other Capital Improvement Construction Outreach

As the Authority grows its capital improvement program, there is a greater need to work closely with stakeholders throughout the community to prepare them for water, sewer, and green stormwater infrastructure projects impacting their communities. The Authority has created a comprehensive capital improvement outreach protocol to connect project managers and the Authority's public affairs team in the early stages of a project to ensure that the Authority clearly communicates the benefits, impacts, and expectations of construction work. Public Affairs team members attend many of the engineering progress meetings to ensure they are in the loop as projects progress so that the public has the most pertinent, time-sensitive information on projects that will impact where they live or work. Since 2015, this protocol has been implemented on 28 projects and is currently being used to guide communications on 21 on-going projects.

The protocol sets timelines and expectations for communications on projects, from the 30% design phase until completion. Public Affairs has committed to providing direct contacts for customers when

they have issues or concerns on a project and will work directly with project managers to resolve issues. Project managers and members of the Authority's Public Affairs team are expected to use an approved set of communications templates, such as letters and informational handouts, to properly relay project details to residents, business owners, and other community leaders who represent those affected by the work. The information is also disseminated to stakeholders in the form of releases to media and government officials and emails to residents who may have concerns about construction impacts.

PWSA's website, which was updated to be more user-friendly and function for customers in late 2019, houses a project page for each PWSA capital project in design or construction. Residents can check an interactive map of their neighborhood to see which projects are upcoming and easily access contact information for project managers and members of the Public Affairs team.

PWSA hosts and participates in meetings and events throughout the city to share information on our programs and projects. Our staff attended 61 meetings in 2018, 83 meetings in 2019, and 30 meetings to date in 2020. With the COVID-19 shelter in place order, we will have to consider other ways to share information with the community. We are looking into digital resources that will allow us to host community meetings online and solicit project feedback using online engagement platforms.

8.4 Industry Relations Outreach

Throughout 2019, PWSA industry relations focused on enhancing the relationship with developer and contractor customers through increased outreach and technology. PWSA Public Affairs established a single point of contact for any development questions or commercial customer issues. The point of contact also schedules pre-development meetings which are typically the first contact with any potential applicants. At this meeting, the property owner, their consultants, and contractors meet with PWSA staff to ensure that the project complies with water and sewer regulations. To provide an equal level of service to each customer, the information provided at meetings has been standardized while maintaining the flexibility required for each unique project. Staff met with 118 potential applicants in 2019.

As a companion document to pre-development meetings, the Procedures Manual for Developers was revamped to more clearly outline processes and procedures. Renamed the Developer's Manual, the document aims to simplify the development process for our customers and staff. To align the information provided at pre-development meetings and in the Developer's Manual, a new developer and contractor dedicated section was created on our website. The upgraded functionality clearly delineates permit types, submission requirements, online forms and digital submittals. Lastly, we generated a development projects GIS layer for internal staff to coordinate planned work with any upcoming developments.

PWSA also ramped up efforts to reach industry partners including contractors, third party engineers, plumbers, and non-profits. We attended events to promote our upcoming work contracts to organizations such as the Engineering Society of Western Pennsylvania, Society of Engineering Outreach, Society of Military Engineers, Government Agency Procurement Office, MWDBE Governmental Committee, Building Owners and Manager Association, and more. We also attended open houses, office openings, and industry award ceremonies to meet and network with new talent and potential partners. A PWSA Public Affairs team member was also selected to serve as a board member for the ACE Mentor

Program of America Western PA affiliate. The program promotes careers in architecture, construction, and engineering to high schools students and is supported by the largest industry partners in Western PA

The Pittsburgh Water and Sewer Authority's (PWSA) Lead Infrastructure Plan
Docket Nos.: M-2018-2640802; M-2018-2640803; P-2018-3005037; P-2018-3005039

PWSA's service plan to remedy residential lead service lines (LSLs) existing within and connected to its water distribution system is contained in the following documents in this proceeding: Compliance Plan (CP), CP Supplement, the Long-Term Infrastructure Improvement Plan dated August 21, 2019 (Hearing Exh. 3) (LTIIP), PWSA's Board July 2019 Policy (Exh. RAW C/46), relevant expert testimony, and the Partial Settlement filed September 13, 2019. In the Opinion and Order entered in this proceeding (Final Order), the Commission, *inter alia*, approved in part and modified in part PWSA's LSL plan. Based on the foregoing documents and the Final Order, below is a summary of PWSA's LSL plan.

PWSA's Service Plan to Remove Lead Service Lines
Existing in and Connected to its Water Distribution System

- A. **Effective Dates:** The terms in this section will take effect on the entry date of the Final Order. Unless specifically noted, each term in this section will remain in effect until December 31, 2026. Partial Settlement at ¶ III.PP.

- B. **Goal:** PWSA's current goal is to complete the replacement of all public- and private-side lead service lines in its system by 2026. Partial Settlement at III.QQ.2. "Public-side service line" means the portion of the service line on the street side of the curb box. "Private-side service line" means the portion of the service line on the residence side of the curb box. Partial Settlement at ¶ III.OO.3-4.

- C. **Objective:** To refrain from performing partial lead service line replacements at residential properties. July 2019 Policy at 1. "Partial lead service line replacement" means the replacement of a public-side service line, made of any material, without the simultaneous replacement of a connected private-side lead service line. Partial Settlement at ¶ III.OO.6.

- D. **Eligibility Criteria:** This plan applies to:
 - 1. Any lead service line: (Partial Settlement at ¶ III.QQ.2)
 - a. serving any residence (as defined in Partial Settlement at ¶ III.VV.1.a.i) (defined below);
 - b. of which PWSA is aware;
 - c. the replacement of which is operationally feasible (as determined pursuant to ¶ 3.3 of PWSA's Board July 2019 Policy (defined below); and,

- d. in the case of a private-side line, the owner authorizes the replacement or replaces the line in accordance with PWSA policy. (Partial Settlement at ¶ III.QQ.2)
- 2. “Service Line” means the pipe or pipes that connects a water main to a building inlet and any pigtail, gooseneck, or other fitting connected to the pipe or pipes. Partial Settlement at ¶ III.OO.2.
- 3. “Lead service line” includes any service line made of lead, galvanized iron, or galvanized steel. Partial Settlement at ¶ III.OO.5.
- 4. “Residence” means a residential property with no more than four (4) dwelling units or a dual use property (commercial & residential) with service lines 1-inch in diameter or less, for which the PWSA has maintenance responsibility for the water service line from the water main to and including the curb stop, as more fully described in PWSA Rules and Regulations. Partial Settlement at ¶ III.VV.1.a; *see* Partial Settlement at 49, n. 36.
 - a. Includes any lead service line greater than 1-inch diameter that is connected to a single-family residence. If PWSA discovers such a line, PWSA will replace the line with a suitable-sized line. *See* Exhibit RAW/C-2, PWSA’s response to TUS-I-4.
- 5. If PWSA determines, in its sole discretion, that replacement of the portion of the lead service line owned by the property owner at a particular residence or related interior plumbing modification is not technically feasible, the residence is unsafe from a structural or sanitary condition, or will result in excess expense, due to conditions, such as length, terrain, obstructions, structures, pavements, trees, or other utilities, PWSA may exclude such residence and not replace the private side of the LSL. Partial Settlement at ¶ III.QQ.2; July 2019 Policy at 2, ¶ 3.3 (PWSA Exh. RAW/C-46).

E. Inventory of LSLs:

- 1. PWSA is working with the University of Pittsburgh to develop a machine-learning model that will predict the material composition of public-side and private-side service lines, based on a model used in Flint, Michigan. PWSA will continue to collaborate with the University of Pittsburgh on this project. Partial Settlement at ¶ III.QQ.1.

- a. After the model is peer-reviewed and quality assurance / quality control review is completed for its predictions of the locations of public- and private-side LSLs, PWSA will use the data from the model predictions as part of the lead service line mapping on PWSA's website. Partial Settlement at ¶ III.QQ.1.a.
 - b. PWSA will publicize these updates by, at a minimum, issuing a press release once they are final. Partial Settlement at ¶ III.QQ.1.b.
 - c. After the machine-learning model generates predictions for the composition of all public- and private-side service lines and no later than March 31, 2020, PWSA will present to the Community Lead Response Advisory Committee (CLRAC), for its information and advisory input, PWSA's plan for completing its inventory of service lines, including the steps PWSA will take to further investigate the composition of service lines based on the model's predictions. Partial Settlement at ¶ III.QQ.1.c.
2. By December 31, 2020, PWSA will establish (and provide to the CLRAC, for its review and advisory input), an estimate of the number of private-side lead service lines connected to residential structures in PWSA's service area. Partial Settlement at ¶ III.QQ.2.a.
 3. PWSA will provide an update to this inventory on an annual basis as described below in Section III.QQ.3 of the Partial Settlement. Partial Settlement at ¶ III.QQ.2.a.

F. Retroactive private-side replacements to be performed by PWSA for partial replacements of public-side lead service lines previously completed by PWSA between February 1, 2016 and December 31, 2018: PWSA's 2016 exceedance of the lead action level under the Lead and Copper Rule (Rule) triggered PWSA's requirement under the Rule to replace seven percent of its public-side LSLs within one year. When PWSA first began its replacement

efforts, it replaced only the public-side of the lead service lines.¹ PWSA suspended partial LSL replacements in June 2017 after post-replacement testing revealed elevated lead levels at several homes.²

1. Customers who received a partial public LSL replacement after February 1, 2016 due to a PWSA action, such as, for example, a LSLR contract, PWSA operation replacement or water main replacement, “will be eligible” to have their private LSL replaced by PWSA, at no charge to the customer. July 2019 Policy at 1-2.
2. For customers who elected to replace their private LSL as a result of a PWSA public side LSL replacement between February 1, 2016 and December 31, 2018, PWSA will offer a direct reimbursement for costs incurred up to a maximum of \$5,500 (based on the average cost for PWSA to replace private lines). July 2019 Policy at 2.
3. For customers who elected to replace their private LSL on their own, meaning, the decision was unrelated to a public side LSL, PWSA will not offer reimbursement. July 2019 Policy at 2.

G. Systematic program replacements performed by PWSA after January 1, 2019:

1. PWSA will offer to replace a private-side LSL at no direct cost to the property owner:
 - a. At any residence where PWSA replaces a public-side service line connected to a private-side LSL; and
 - b. At any residence with a private-side only LSL located within a work order area of a neighborhood-based LSL replacement program where LSL replacements are performed after completion of the 2019 LSL Replacement program which is currently scheduled to be completed by September 2020.
 Partial Settlement at ¶ III.VV.1.a.i-ii.
2. To complete the replacement of all LSLs by 2026, PWSA will perform

¹ As of August 2, 2019, PWSA performed 456 partial LSL replacements between February 1, 2016 and December 31, 2018, and PWSA has offered to replace the private LSL at all of those locations. Of the 456 locations, 245 property owners accepted PWSA’s offer and PWSA performed private LSL replaces at 215 of those locations. A total of 79 eligible property owners declined to have their line replaced, and the remainder 123 property owners were unresponsive. Twenty-five of the locations were determined to be non-lead after verification. PWSA St. No. C-1SD at 29.

² UNITED St. C-2 at 9-10 (citing PWSA to Temporarily Suspend Partial Lead Line Replacements (June 2, 2017), *available at* <http://lead.pgh2o.com/pwsa-to-temporarily-suspend-partial-lead-line-replacements/>).

the work in accordance with the following programs:

a. ***Small Diameter Water Main (SDWM) Accelerated Replacement Program:***

- i. “Small-diameter water main replacement program” means PWSA’s program for replacing small-diameter water mains and associated lead service lines between 2019 and 2026, as described in the Long-Term Infrastructure Improvement Plan (LTIP) on page 18 and Tables 2-7 and 2-8 on pages 28-29 (*See* PWSA Hearing Exh. No. 3). Partial Settlement at ¶ III.OO.11.
- ii. PWSA’s system has about 720 miles of SDWMs. LTIP at 18. PWSA estimates that, on average, each mile of SDWM has 40.9 private side LSLs connected to it. UNITED St. C-2SUPP-R at 4 (citing PWSA response to UNITED-I-13).
- iii. Between 2020 and 2026, PWSA is proposing to conduct most LSL replacements through its accelerated SDWM replacement program. LTIP at 28 (PWSA Hearing Exh. No. 3); PWSA St. C-1 at 56; UNITED St. C-2 at 12. PWSA is proposing to accelerate replacement of its SDWMs to reduce service disruptions from main breaks. LTIP at 18; UNITED St. C-2 at 12.
- iv. For 2020, PWSA has identified SDWMs for replacement. UNITED St. C-2 at 12; PWSA St. C-1 at 63; Exhibit RAW/C-25. These mains are located in the same areas as those covered by the 2019 neighborhood-based LSL replacement program. UNITED St. C-2 at 12; PWSA St. C-1 at 63.
- v. Starting January 1, 2021, PWSA will endeavor, to the maximum extent possible and consistent with balancing its other regulatory, infrastructure and consumer obligations and priorities, to replace at least ten (10) miles per year of SDWM in Priority Lead Neighborhoods. Partial Settlement at ¶ III.VV.2.a.

A. No later than July 1, 2020, PWSA, in

consultation with the CLRAC, will designate the census tracts or other appropriate geographic units in its service area that constitute Priority Lead Neighborhoods. Partial Settlement at ¶ III.VV.2.a.1.

- B. The designation of Priority Lead Neighborhoods will consider children's blood lead levels, the prevalence of children under six years of age and women of child-bearing age, income, lead service line density, or any combination of lead-related or public health-related factors recommended by the CLRAC. Partial Settlement at ¶ III.VV.2.a.ii.
- vi. By September 30, 2019, and each year thereafter until September 30, 2026, PWSA will create (and present to the CLRAC, for review and advisory input) a plan describing the areas where the SDWM replacements will occur in 2021 and each year thereafter. Partial Settlement at ¶ III.QQ.3.
- A. The plan will include an inventory update detailing the number and location of lead service lines replaced the preceding year, the mileage of SDWMs (and number of associated lead service line replacements) occurring in Priority Lead Neighborhoods (infra ¶ III.VV.2.a), the total mileage of small diameter water mains and number of lead service lines anticipated to be removed in the existing and following year, and the number and location of lead service lines remaining. Partial Settlement at ¶ III.QQ.3.a.
 - B. For the September 2022 update and each year thereafter until the September 2026 update if PWSA did not replace 10 miles of small diameter water main in Priority Lead Neighborhoods in the preceding year, *see* ¶ III.VV.2.a, the inventory update will explain the factors that prevented PWSA from doing so. Partial Settlement at ¶ III.QQ.3.b.

- C. The inventory update will also explain how PWSA plans to address those factors and endeavor to the maximum extent possible to replace at least ten (10) miles of small diameter water main in Priority Lead Neighborhoods in the existing and following year. Partial Settlement at ¶ III.QQ.3.c.
- vii. PWSA plans to complete a two-year project to add information about its SDWMs to its Geographic Information System (GIS) database. PWSA St. C-1 at 63; UNITED St. C-2 at 13 (citing UNITED St. C-2 Appendix B, 6, UNITED I-8).
- b. ***LSL Neighborhood-Based Replacement Program:***
 - i. “Neighborhood-based lead service line replacement program” means the program, described in part on pages 27-28 of the LTIIP (PWSA Hearing Exh. No. 3), in which PWSA replaces all public-side lead service lines and eligible private-side lead service lines in work order areas. Partial Settlement at ¶ III.OO.12.
 - ii. *Discontinuance of Existing 2019 LSL Replacement Program in September 2020:* During 2019 and 2020 LSL replacements under this program, which replaces lines on a neighborhood basis, overall work orders will be prioritized based on the prevalence of children under six years of age and women of child bearing age, and incidences of high blood levels in PWSA’s drinking water service territory. July 2019 Policy at 2; PWSA St. No. C-1SD at 27; PWSA St. C-1RJ at 16. PWSA is proposing to discontinue its neighborhood-based replacement program after completing replacements funded by PennVEST in September 2020. PWSA St. C-1 at 56-58; PWSA St. C-1R at 51-52; PWSA St. C-1SD at 27; UNITED St. C-2 at 12 (citing UNITED St. C-2 Appendix B, 24, I&E PS-30).
 - iii. *For any future neighborhood-based LSL replacement program:* PWSA will prioritize neighborhood-based LSL replacement program work orders according to factors identified in consultation with the CLRAC,

including but not necessarily limited to, children's blood lead levels, the prevalence of children under six years of age and women of child bearing age, income, and LSL density. Partial Settlement at ¶ III.VVV.3.a.i. PWSA will try to obtain a property owner's consent for a private-side LSL replacement by making at least one attempt to contact the property owner by mail, one attempt by telephone, and one attempt by visiting the residence in person. Partial Settlement at ¶ III.VV.3.a.ii.

- c. ***Community Environmental Project (CEP):*** As required under the DEP COA, by November 2020, PWSA will offer to replace the private-side LSLs of about 200 low-income customers (defined as households with income levels below 250 percent of the federal poverty level (FPL), as adjusted annually) at a program budget of \$1.8 million.³ July 2019 Policy at 3; 2017 DEP COA ¶ 4(c); UNITED St. C-2 at 11. Replacements performed under the CEP will be identified by customer-requests and vetted through a third-party administrator. July 2019 Policy at 3. The Dollar Energy Fund, Inc. is the current administrator. PWSA St. C-1SD at 32.⁴
- d. ***Ongoing Maintenance of Line Breaks/Leaks:*** PWSA will replace a private-side LSL when PWSA's operations crew replaces a public-side service line, regardless of material, as a result of line breaks or leaks, including unplanned emergency replacements. July 2019 Policy at 3.
- e. ***Additional Plan to be filed by March 31, 2021:***
 - i. By March 31, 2021, PWSA will formulate a plan and timeline for removing the known public-side and private-side LSLs connected to a residential structure that will not be replaced by PWSA's other LSL

³ In December 2019, PA DEP approved increasing the eligibility threshold from households with income levels below 250 percent of the federal poverty level (FPL), as adjusted annually, to households with income levels below 300 percent of the FPL, as adjusted annually.

⁴ As of July 29, 2019, a total of 269 customers have qualified under the CEP program and returned the customer consent agreement. The PWSA verified the service line matter of 185 CEP households. Of these households, the PWSA found non-lead lines on both sides of the curb stop at 79 locations. The PWSA replaced the private side LSL at 74 locations and the public side LSL at 66 locations, as some of the locations did not require a full LSL replacement. Work on the remaining locations is pending. PWSA St. C-1SD at 32. As of June 30, 2019, the PWSA expended a total of \$233,897.50 of CEP locations funded from the \$1.8 million budget established in the PA DEP COA. The PWSA also spent \$382,217 on the public side and other CEP-location related work that is not eligible to be funded from the \$1.8 million budget. PWSA St. C-1SD at 33.

replacement efforts, including the SDWM replacement program described above. The plan will describe how PWSA will locate and replace the remaining known LSLs in its system, identify a target date for replacing all LSLs, and establish milestones for measuring progress towards replacement of all LSLs by the target date. Partial Settlement at ¶ III.QQ.2.b.

- ii. If PWSA determines that it is not feasible to replace all LSLs by December 31, 2026, the plan will identify a new target date and include an explanation as to why that new target date represents the earliest feasible date for replacing all LSLs. The plan will be presented to the CLRAC for its review and advisory input. PWSA may revise the plan, including milestones and the target date for replacing all LSLs, as needed as new information becomes available. Any such revisions will be presented and explained to the CLRAC for its review and advisory input. In evaluating the feasibility of its plan, PWSA will consider factors such as financial considerations, operational constraints, federal and state regulatory requirements and the results of its inventory. Partial Settlement at III.QQ.2.c.

- f. ***Identification of Additional Funding Sources for LSL Replacements:*** PWSA will make a good faith effort to identify additional funding sources other than rates for lead service line replacements, including but not limited to low or no cost funding opportunities, such as loans and grants. PWSA will request funding from these sources if appropriate and reasonable. This commitment will continue for the duration of the replacement program for lead service lines. Partial Settlement at ¶ III.VV.1.c.

H. Terms and Conditions of Private Side Replacements Performed by PWSA:

The following terms and conditions of PWSA performing replacements of the private-side LSLs will apply:

1. Prior to conducting a private-side lead service line replacement, PWSA will provide the property owner with information about the property damage that might occur during the replacement and will describe the restoration that PWSA will perform. Partial Settlement at ¶ III.VV.1.d.

2. Property owners will be contacted in advance and asked to enter into an agreement to allow PWSA employees and contractors to gain access to their private property in order to replace their private LSLs. The agreement will include provisions that require the property owner(s) to release and hold harmless the PWSA from any and all claims, causes of action, damages or losses, of any nature, whatsoever with respect to the work performed by PWSA or its contractors.⁵ July 2019 Policy at 3.
3. Homeowners will then be asked to cooperate with PWSA's timeline for replacement and allow workers access to the service line. July 2019 Policy at 3.
4. PWSA will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations in the private home. No other restoration will be conducted for the private side replacement. PWSA will not replace any landscaping, interior finishes, paving, seeding, or walkways. All restoration costs shall be borne by the homeowner. July 2019 Policy at 4.

I. Ad hoc replacements initiated by property owners after January 1, 2019: “Ad hoc replacements” refer to when a property owner elects on their own initiative to arrange for the replacement of a private side LSL when PWSA is not then-currently replacing the public side of the line. PWSA developed this program in the context of PWSA's implementation in April 2019 of its new orthophosphate water treatment plan in accordance with DEP requirements, which PWSA expects will reduce lead levels to below the lead action level under the Lead and Copper Rule. PWSA M.B. at 60; PWSA St. C-1RJ at 3, 17-18.

1. If the private LSL is connected to a public LSL, PWSA proposes to replace the public side portion of the LSL when a customer elects to replace the

⁵ A limitation of liability provision in connection with the PWSA's tort liability for any work it performs to replace the customer-owned service line in accordance with the PWSA's plan must be filed for the Commission's approval in the PWSA's tariff. See 52 Pa. Code § 69.87 (state case law permits tariff provisions to limit the liability of utilities to specified dollar amounts for injury or damages as a result of negligence or intentional torts); see also *In re: Tariff Provisions That Limit the Liability of Utilities for Injury or Damage as a Result of Negligence or Intentional Torts*, Pa. PUC v. PECO Energy Company, M-00960882, R-00943065, Pa. PUC LEXIS 111 (Declaratory Order entered March 17, 1997); see also *DeFrancesco v. Western Pennsylvania Water Co.*, 478 A.2d 1295, 1307 (Pa. Super. 1984) (holding a tariff provision limiting the company's liability was exculpatory and void as against public policy because it completely negated the water company's liability for its acts of negligence or intentional tort); see also *State Farm Fire and Casualty Co. v. PECO Energy Company*, 54 A.2d 921, 926-927 (Pa. Super. 2012) (holding that the tariff provision limiting liability to \$500 was valid and enforceable because the Commission had determined the reasonableness of the tariff and because the provision limited liability rather than negating liability altogether). As clarification, any approved limitation of liability provision for tort liability would not extend to any separate service claim raised in a complaint filed with the Commission against the PWSA under 66 Pa. C.S. § 701.

private side. This proposal eliminates a partial line replacement.

2. PWSA proposes to reimburse the customer for all or a portion of the cost of the private side replacement based on the customer's income. The proposed income-based reimbursement of the cost to replace private LSL is tiered as follows:⁶
 - a. Full cost reimbursement for households with income levels below 300 percent of the federal poverty level (FPL),⁷ as adjusted annually;
 - b. 75 percent of the cost for households with income levels between 301 and 400 percent of the federal poverty level, as adjusted annually;
 - c. 50 percent of the cost for households with income level between 401 and 500 percent of FPL, as adjusted annually;
 - d. For all other households, a \$1,000 stipend towards the replacement cost of private side LSL replacement. July 2019 Policy at 4.
3. PWSA is not taking responsibility for replacement of private LSLs when it is not replacing the public side of the service line. A customer would be responsible to determine if they have a private side LSL at their home. UNITED St. C-2SUPP-R at 3. In these circumstances, the customer is required to hire a private contractor, and PWSA will reimburse the customer for the lead line replacement expenses based on the customer's income level. PWSA St. C-1RJ at 9.
4. PWSA is willing to directly pay the contractor rather than to require the customer to first fund it and wait for reimbursement from PWSA. PWSA St. C-1RJ at 11 (articulating PWSA's desire to do this and that it was exploring the option at the time of submitting rejoinder testimony); *see also* PWSA M.B. at 63.
5. PWSA estimates that it would incur administrative costs of \$1,000 for each ad hoc replacement. OCA St. 2R-Supp at 5 (citing UNITED-XII-15 Attach. A, note 3). PWSA estimates that the average cost of direct construction work to replace a private side LSL by a customer's private contractor is about 75% of the direct construction cost that PWSA averages (\$5,500).

⁶ The PWSA estimates that approximately 53.3% of households will qualify for full reimbursement, 12.1% will qualify for 75% reimbursement, 9% will qualify for a 50% reimbursement. PWSA St. C-1SD at 31.

⁷ The FPL is a sliding scale that is updated each year by the U.S. Department of Health and Human Services. The scale is based on the number of people living in the household. Each additional person in the household increases the FPL by \$4,420. OCA St. 2R-Supp at 4.

July 2019 Policy at 2. PWSA is budgeting for 8,000 to 20,000 replacements through this program. PWSA St. No. C-1RJ at 6, 9-10.

J. Partial replacements performed by PWSA after January 1, 2019:

1. “Partial lead service line replacement” means the replacement of a public-side service line made of any material without the simultaneous replacement of a connected private-side LSL. Partial Settlement at ¶ III.OO.6.
2. PWSA will complete the replacement of a public-side LSL without simultaneously completing the replacement of the private-side LSL in the following circumstances:
 - i. If PWSA determines, in its sole discretion, that replacement of the portion of the LSL owned by the property owner at a particular residence or related interior plumbing modification is not technically feasible, the residence is unsafe from a structural or sanitary condition, or will result in excess expense, due to conditions, such as length, terrain, obstructions, structures, pavements, trees, or other utilities, PWSA may exclude such residence and not replace private side of the LSL; (Partial Settlement at ¶ III.VV.1.b.i; July 2019 Policy at 2, ¶ 3.3)
 - ii. PWSA is replacing a public-side service line through the small-diameter water main replacement program or is moving a residential service line from an abandoned water main to a different water main, and PWSA is unable to obtain consent to replace the private-side LSL from the property owner after making at least one attempt to contact the property owner by mail, one attempt by telephone, and one attempt by visiting the residence in person; (Partial Settlement at ¶ III.VV.1.b.ii)
 - iii. A property owner who also resides at the property signs a formal agreement stating that they do not consent to a free private-side LSL replacement and that they understand the risks of a partial replacement; or (Partial Settlement at ¶ III.VV.1.b.iii)
 - iv. PWSA is replacing a public-side service line as a result of an emergency circumstance (e.g., water main leak, broken curb stop, or damage to other infrastructure requiring a public-side service line replacement), and PWSA is unable to obtain consent to replace the private-side LSL from the property owner after making at least one attempt to contact the property owner by telephone and one attempt by visiting the residence in person. (Partial Settlement at ¶ III.VV.1.b.iv.)

- v. In the event PWSA determines it will not complete the replacement of a private-side lead service line due to any of the circumstances described in the Partial Settlement at ¶ III.VV.1.b.i., PWSA will temporarily not replace the public-side service line until it has reported the factual circumstances to the CLRAC in accordance Partial Settlement at ¶ III.WW.4.b. After consulting with the CLRAC, PWSA should make a determination as to the appropriate next steps, including, but not limited to, potentially not replacing the public side of the line while corrosion control treatments and distribution of water filters remain in place or potentially receiving Commission approval to make reasonable changes, substitutions and extensions in or to service and facilities as may be necessary or proper for the accommodation and safety of patrons with extraordinary circumstances or potentially receiving Commission approval of tariff provisions quantifying specific limits on PWSA's financial responsibility for a private-side lead service line replacement in extraordinary circumstances.⁸
 - vi. In the event PWSA does not complete the replacement of a private-side lead service line due to any of the circumstances described in the Partial Settlement at ¶ III.VV.1.b.ii-iv., PWSA will not permit the re-connection of the private-side lead service line to the newly installed public-side service line in accordance with PWSA's tariff at Section B, Rules 1 and 4. PWSA will begin the process to terminate service to the residence with prior notice in accordance with PWSA'S tariff at Section C, Rule 3.j. Reconnection of service shall not be permitted until the customer certifies the removal of the private-side lead service line in accordance with PWSA's tariff at Section B, Rule 4.⁹
3. PWSA will provide residents who receive partial LSL replacements with information regarding the risks of lead exposure from partial LSL replacements. Partial Settlement at ¶ III.TT.3.a.

K. Post-Replacement Measures:

⁸ The Commission's March 26, 2020 Final Order unilaterally added this subsection to the Partial Settlement On April 10, 2020, PWSA filed a Petition for Reconsideration, Clarification and/or Amendment of the Commission's March 26, 2020 Final Order and requested modifications to this subsection. As the Petition for Reconsideration, Clarification and/or Amendment is pending before the Commission, this subsection is held in abeyance.

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1. ***Post-replacement notices and instructions:*** Following a LSL replacement, full or partial, PWSA does the following steps:
 - a. Leaves an informational door hanger at the residence. The door hanger informs the resident of the work done, instructs them how to flush their pipes and taps, and directs them to collect a post-replacement water sample after allowing the water to sit unused for 6 to 8 hours.
 - b. Provides the household with a tap water sample kit.
 - c. If a partial LSL was performed, and the resident fails to return the sample, PWSA will provide another door hanger reminder about one month after the date of replacement.
 - d. PWSA provides an additional free test to a customer when their previous post-replacement tap water sample reveals lead levels above 15 ppb.
 - e. If a post-replacement sample shows water lead levels above 50 ppb, PWSA will deliver to the residence at least one case of bottled water per day until PWSA completes a meter drop and flush at the residence. Residents who receive a meter drop and flush will remain eligible for additional filter cartridges and other assistance as described above in ¶¶ III.TT.1 and III.TT.3. Partial Settlement at ¶ III.UU.1.
2. ***Post-replacement water filter distribution program:***
 - a. PWSA presently offers an NSF-certified pitcher (not tap) filter and three replacement cartridges to customers free of charge after a partial or full LSL replacement. PWSA St. C-1 at 62-63.
 - b. PWSA will continue to provide, at no charge, a tap water lead testing kit, water filter NSF-certified to remove lead, and six months of filter cartridges to a residence whenever PWSA performs a LSL replacement. Partial Settlement at ¶ III.TT.3.
 - i. PWSA will provide residents who receive partial lead service line replacements with information regarding the risks of lead exposure from partial lead service line replacements. Partial Settlement at ¶ III.TT.3.a.
 - ii. If a resident's post-replacement tap water lead test reveals lead levels above ten (10) parts per billion, PWSA will provide to the resident an additional testing kit, at no charge, and instructions to return a follow-up test result three months after the initial test. Partial Settlement at ¶ III.TT.3.b.

- iii. If the three-month follow-up test result shows lead levels above ten (10) parts per billion, PWSA will assist the resident in determining why lead levels remain elevated. Partial Settlement at ¶ III.TT.3.c.

L. Interior Plumbing Inspections:

1. Whenever PWSA replaces a residential water meter, PWSA will inspect the interior plumbing adjacent to the water meter and inform residents in writing of the materials observed. If the interior plumbing is composed of galvanized steel or iron, PWSA will inform customers of the risks of lead release from such plumbing. Partial Settlement at ¶ III.RR.1.
2. Whenever PWSA performs a private-side lead service line replacement without a simultaneous meter replacement, PWSA will make good faith efforts to document the material making up the interior plumbing adjacent to the private-side lead service line and inform residents in writing of the materials observed. If the interior plumbing is composed of galvanized steel or iron, PWSA will inform customers of the risks of lead release from such plumbing. Partial Settlement at ¶ III.RR.2.

M. Meter Replacements and Processes Related to Potential LSLs:

1. Starting September 1, 2019 and ending three months thereafter, PWSA will provide, at no charge, a tap water lead testing kit, whenever PWSA replaces a water meter at a residence that has a private-side lead or galvanized service line or lead-bearing or galvanized interior plumbing adjacent to the water meter. Partial Settlement at ¶¶ III.SS.1 and III.TT.1.
2. Starting September 1, 2019, PWSA will conduct a three-month study to determine the potential impact of replacing a water meter at locations with a lead service line or adjacent lead-bearing or galvanized interior plumbing. Partial Settlement at ¶ III.SS.2.
3. By January 31, 2020, PWSA will present CLRAC with the results of the samples received pursuant to Section III.SS.1 to demonstrate potential impacts, for CLRAC's information and to solicit feedback. Partial Settlement at ¶ III.SS.3.
 - a. If more than ten percent of the results received exceed ten parts per billion of lead, PWSA will provide a water filter NSF-certified to remove lead, six months of filter cartridges, and written information

on how to request a free tap water lead testing kit whenever PWSA replaces a water meter at a residence that has a private-side lead or galvanized service line or lead-bearing or galvanized interior plumbing adjacent to the water meter. Partial Settlement at ¶ III.SS.3.a.

- b. PWSA will start providing the water filters NSF-certified to remove lead and the filter cartridges as soon as PWSA has evaluated the results of the study and determined that more than ten percent of the results received exceed ten parts per billion of lead. Partial Settlement at ¶ III.SS.3.b.

- 4. PWSA will ensure that a new meter installed at any residence is “lead free,” as defined at 42 U.S.C. § 300g-6(d). Partial Settlement at ¶ III.SS.4.

N. Tap Water Testing, Filter Distribution and Bottled Water (not in connection with PWSA’s completion of a LSL replacement):

- 1. PWSA will provide, at no charge, a tap water lead testing kit to any resident within its service area who requests one. Partial Settlement at III.TT.1. PWSA will also provide, at no charge, a tap water lead testing kit to any resident within its service area who receives a meter replacement pursuant to Section III.SS.1 of the Partial Settlement. Partial Settlement at ¶ III.TT.1.
 - a. If such testing reveals lead levels above ten (10) parts per billion, PWSA will provide to the resident, at no charge, a water filter NSF-certified to remove lead, six months of filter cartridges, and an additional tap water lead testing kit with instructions to return a follow-up test result three months after the initial test.
 - b. So long as the resident continues to return testing kits, PWSA will continue to provide additional testing kits at three-month intervals and additional filter cartridges at six-month intervals until the resident’s lead levels fall below ten parts per billion.
 - c. PWSA will include information on this filter distribution policy in all materials publicizing the availability of tap water lead testing kits.
- 2. PWSA will offer, at no charge, a NSF-certified water filter to remove lead and six months of filter cartridges to any customer enrolled for PWSA’s Customer Assistance Programs and any tenant that would be eligible for PWSA’s Customer Assistance Programs if they were a customer, when PWSA’s records (including predictions from the machine-learning model

described above in Inventory) indicate that the customer's or tenant's residence has a public-side or private-side service line made of lead or unknown material. This term will remain in effect until PWSA's Lead and Copper Rule sampling results fall below the lead action level during two consecutive six-month monitoring periods. Partial Settlement at ¶ III.TT.2.

“Customer Assistance Programs” means PWSA's Bill Discount Program, Hardship Fund program, Winter Shut Off Moratorium, Community Environmental Project, and any future programs created by PWSA to assist customers in paying for water service or securing access to safe drinking water. Partial Settlement at ¶ III.OO.9.

3. If a residence's tap water lead test reveals lead concentrations above 50 parts per billion, PWSA will deliver to the residence at least one case of bottled water per day until PWSA completes a meter drop and flush at the residence. Residents who receive a meter drop and flush will remain eligible for additional filter cartridges and other assistance as described above in Sections ¶¶ III.TT.1 and III.TT.3. Partial Settlement at ¶ III.UU.1.

O. Community Lead Response Advisory Committee (CLRAC):

1. “CLRAC” means the Community Lead Response Advisory Committee established pursuant to pages 9-13 of PWSA's Joint Petition for Partial Settlement, and as approved by Final Order of the Commission entered on February 7, 2019 in PWSA's first jurisdictional base rate case docketed at R-2018-3002645 *et al.* Partial Settlement at ¶ III.OO.13.
2. The term of the CLRAC is extended through December 31, 2026, unless active CLRAC members vote unanimously to terminate the CLRAC at an earlier date. Partial Settlement at ¶ III.WW.1.
3. Notwithstanding ¶ III.WW.1, PWSA may terminate the CLRAC after January 1, 2022, if there are just and reasonable circumstances for its termination, including insufficient participation and/or engagement in the CLRAC. Termination of the CLRAC will be effective 120 days after notice is provided by PWSA to CLRAC members. Partial Settlement at ¶ III.WW.2.
4. If a CLRAC member is no longer willing or able to continue to participate in the CLRAC, another representative of the departing member's organization may fill the departing member's position on the CLRAC. If no other representative of the departing member's organization is willing or able to fill the departing member's position, PWSA or any member of the CLRAC,

including the departing member, can nominate a candidate to fill the departing member's position. At least one active committee member must be a public health expert. Candidates must be approved by two-thirds of current CLRAC members. Partial Settlement at ¶ III.WW.3

5. PWSA will consult with the CLRAC regarding its lead remediation efforts on at least a quarterly basis. PWSA's consultation will include, but not be limited to:
 - a. Prioritization of residences for lead service line replacements based on children's blood lead levels, the prevalence of children under six years of age and women of child-bearing age, income, lead service line density, or any combination of factors recommended by the CLRAC, as part of:
 - i. Small-diameter water main replacements performed after January 1, 2021, including designation of Priority Lead Neighborhoods, as described above at ¶ III.VV.2.a; and
 - ii. The neighborhood-based lead service line replacement program, as described above at ¶ III.VV.3.
 (Partial Settlement at ¶ III.WW.4.a.i-ii)
 - b. An update every six months on the number of instances in which PWSA has been unable to replace a private-side lead service line because of the conditions set forth in ¶ III.VV.1.b. (Partial Settlement at ¶ III.WW.4.b)
 - c. An analysis of the costs incurred by customers seeking reimbursements for private-side lead service line replacements under Paragraph 3.2 of PWSA Exh. RAW/C-46 (PWSA Lead Service Line Replacement Policy Approved July 26, 2019), for CLRAC's information and to solicit feedback; (Partial Settlement at ¶ III.WW.4.c)
 - d. A quarterly update on PWSA's efforts to secure additional funding for lead service line replacements as described above at Section III.VV.1.c.; (Partial Settlement at ¶ III.WW.4.d)
 - e. Implementation of PWSA's water filter policies, including methods for reducing residents' burdens to obtain filters under the filter programs described above at ¶¶ III.SS and III.TT; (Partial Settlement at ¶ III.WW.4.e)

- f. Improving outreach efforts and exploring other methods for obtaining customer consent for private-side lead service line replacements conducted as part of the small-diameter water main replacement program, neighborhood-based lead service line replacement program, in response to a main or service line leak or break, or through the Community Environmental Project. PWSA will continue to report quarterly to the CLRAC, for its information and to solicit feedback, on the number of property owners who refuse to consent to private-side lead service line replacements, the reasons for their refusal, and PWSA's follow-up efforts to obtain consent; (Partial Settlement at ¶ III.WW.4.f)
- g. PWSA's efforts to increase customer participation in its pre- and post-lead service line replacement and post-meter replacement tap water lead testing programs; (Partial Settlement at ¶ III.WW.4.g)
- h. Public display of the machine-learning model's predictions of the locations of private- and public-side lead service lines and PWSA's plans for completing its inventory, as described above at Section III.QQ.1; (Partial Settlement at ¶ III.WW.4.h)
- i. PWSA's plan for replacing all known remaining lead service lines, as described above at ¶ III.QQ.2; (Partial Settlement at ¶ III.WW.4.i)
- j. PWSA's estimate of the number of private-side lead service lines located in its service area, as described above at ¶ III.QQ.2; and (Partial Settlement at ¶ III.WW.4.j)
- k. The results of the information determined in ¶¶ III.QQ.2 and III.QQ.3 above. (Partial Settlement at ¶ III.WW.4.k)

P. Corrosion Control:

- 1. PWSA will provide the Commission, the Parties, and the CLRAC with quarterly updates regarding the progress of PWSA's orthophosphate program, when PWSA started testing for lead levels, and the results of the lead level testing. Partial Settlement at ¶ III.XX.1.
- 2. PWSA's obligation to provide the quarterly updates set forth in this paragraph will cease when it is no longer required to provide quarterly updates on its orthophosphate program to the Pennsylvania Department of Environmental Protection. Partial Settlement at ¶ III.XX.2.

Q. Cost Tracking Relating to LSL Replacement Costs

1. PWSA will separately identify all projected lead service line replacement costs and details on its cost projections in its rate filings. Partial Settlement at ¶ III.YY.1.
2. PWSA will continue to provide information regarding actual replacement costs as part of its quarterly report provided to the parties pursuant to the Rate Case Partial Settlement Par. A.2.c. (Docket Number R-2018-3002645) that includes quarterly and cumulative year-to-date data. This reporting requirement will continue through the term of the lead service line replacement program. Partial Settlement at ¶ III.YY.2.

Actual replacement costs will be evaluated in future base rate proceedings and shared with the CLRAC. Partial Settlement at ¶ III.YY.2.

3. When PWSA adopts the Uniform System of Accounts, it will show projected and actual lead service line replacement costs as a sub account; PWSA will determine whether it would be appropriate to include in a sub account of Account 333. Partial Settlement at ¶ III.YY.3.