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

March 18, 2021

Docket Nos. M-2021-3024341

P-2017-2606100

Utility Code 212285

SUSAN SIMMS MARSH Esquire

PENNSYLVANIA AMERICAN WATER COMPANY

852 WESLEY DRIVE

MECHANICSBURG PA 17055

[SUSAN.MARSH@AMWATER.COM](mailto:SUSAN.MARSH@AMWATER.COM)

RE: Pennsylvania-American Water Company 2020 Annual Asset Optimization Plan at Docket No. M-2021-3024341

Dear Attorney Marsh:

On March 1, 2021, Pennsylvania-American Water Company (PAWC) filed the above-captioned document with the Public Utility Commission. For the Commission to complete its analysis of the filing, responses are required for the attached data requests. Please forward the requested information to the Commission within 10 business days of the date of this letter.

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

Secretary, Pennsylvania Public Utility Commission

400 North Street, 2nd Floor

Harrisburg, Pennsylvania 17120

During the pendency of the current Proclamation of Disaster Emergency, the Commission shall only accept e-filings in lieu of paper filings for all documents. Please e-file your responses at <http://www.puc.pa.gov/efiling/default.aspx>. A list of allowable e-filing document types is available at <http://www.puc.pa.gov/efiling/DocTypes.aspx>. All filings containing confidential or proprietary information shall be filed with the Commission by e-mailing the Secretary at [rchiavetta@pa.gov](mailto:rchiavetta@pa.gov). Use of encryption with the prior consent of the Secretary is permitted. All documents requiring notary stamps must have original signatures.

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

*I,* [print name of appropriate company representative], *hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).*

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

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

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

Please note that the Commission will be extending the review period of PAWC’s Annual Asset Optimization Plan to June 1, 2021 in order to review the additional information requested.

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

In addition, to expedite review of the 2020 Annual Asset Optimization Plan, please send a copy of the information to Ken Shaffer via e-mail at [kennshaffe@pa.gov](mailto:kennshaffe@pa.gov). Questions may be directed to Ken Shaffer in the Bureau of Technical Utility Services, at the same email, or by telephone at (717) 787-2359. Thank you in advance for your cooperation.

****Sincerely,

Rosemary Chiavetta

Secretary

Enclosure – Data Request Set 1

cc: Tanya McCloskey, Office of Consumer Advocate (w/enclosure), tmccloskey@paoca.org

John Evans, Office of Small Business Advocate (w/enclosure), jorevan@pa.gov

Richard Kanaskie, PUC BIE (w/enclosure), rkanaskie@pa.gov

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

1. The Commission’s Order entered October 3, 2019, at Docket No. P-2017-2606100 (October 2019 Order), Ordering Paragraph No. 4, directed that PAWC’s Annual Asset Optimization Plan (AAOP) filings shall include the number of Company-owned and customer-owned lead service pipes (LSPs) replaced regarding Parts 1 and 2 of PAWC’s plan to replace customer-owned LSPs (Replacement Plan). PAWC’s 2020 AAOP does not appear to quantify the number of Company-owned LSPs replaced in coordination with either Part of PAWC’s Replacement Plan or the number of customer-owned LSPs replaced under each Part of PAWC’s Replacement Plan. Please provide the following information for the 2020 calendar year:
   1. The number of Company-owned LSPs replaced in coordination with Part 1 of PAWC’s Replacement Plan.
   2. The number of Company-owned LSPs replaced in coordination with Part 2 of PAWC’s Replacement Plan.
   3. The number of customer owned LSPs replaced under Part 1 of PAWC’s Replacement Plan; and
   4. The number of customer owned LSPs replaced under Part 2 of PAWC’s Replacement Plan.
2. The October 2019 Order, Ordering Paragraph No. 4, directed that PAWC AAOP filings shall include the total annual cost and average unit cost of replacements, disaggregated by customer rate category and, secondarily, geographic location. PAWC’s 2020 AAOP does not appear to quantify total annual cost and average unit cost values by geographic location. Please the following information for the 2020 calendar year:
   1. The total annual cost of customer owned LSP replacements by geographic location; and
   2. The average unit cost of customer owned LSP replacements by geographic location.
3. The October 2019 Order, Ordering Paragraph No. 6, directed PAWC to report on its customer outreach efforts as part of AAOP filings. PAWC’s 2020 AAOP does not appear to clearly describe PAWC customer outreach efforts for the 2020 calendar year. Please provide a description of PAWC customer outreach efforts for the 2020 calendar year to advise customers to check their services for the possibility of lead, regarding the health effects of lead in drinking water, and regarding PAWC’s Replacement Plan.
4. The October 2019 Order, Ordering Paragraph No. 6, directed PAWC to report on the results of its outreach efforts as part of AAOP filings. PAWC’s 2020 AAOP does not appear to clearly describe the results of PAWC customer outreach efforts for the 2020 calendar year. Please provide a description of the results, both qualitatively and quantitatively, of PAWC outreach efforts for the 2020 calendar year to advise customers to check their services for the possibility of lead, regarding the health effects of lead in drinking water, and regarding PAWC’s Replacement Plan. This description should include, but not be limited to, the number of customers that requested a LSP replacement under Part 2 of PAWC’s Replacement Plan in the 2020 calendar year.
5. Please clarify how the COVID-19 pandemic impacted PAWC’s LSL Replacement Plan activities for the 2020 calendar year.