



THOMAS, NIESEN & THOMAS, LLC

*Attorneys and Counsellors at Law*

RECEIVED

2017 JUN 28 PM 4:25

THOMAS T. NIESEN  
Direct Dial: 717.255.7641  
tniesen@tntlawfirm.com

PA PUC  
SECRETARY'S BUREAU  
FRONT DESK

June 28, 2017

*Via Hand Delivery*

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

In re: Docket No. A-2017-2605434  
Application of Aqua Pennsylvania Wastewater, Inc. pursuant to Sections 1102 and 1329  
of the Public Utility Code for Approval of its Acquisition of the Wastewater System  
Assets of Limerick Township

Dear Secretary Chiavetta:

We are counsel to Aqua Pennsylvania Wastewater, Inc. in the above matter and are submitting, for filing with this letter, responses to the Bureau of Technical Utility Services Data Request 1, Nos. A-1 through A-12 and A-16 through A-18 and objections to Data Request 1, Nos. A-13 through A-15.

Very truly yours,

THOMAS, NIESEN & THOMAS, LLC

By

Thomas T. Niesen

cc: Certificate of Service (w/encl.)  
Jordan Van Order, TUS (via hand delivery, w/encl.)  
Alexander R. Stahl, Esquire (via overnight mail, w/encl.)

Respondent: Mark J. Bubel, Sr., P.E.

Date: 06/28/2017

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-1**            The Application identifies 750 feet of wastewater pipe to be acquired in the northeast corner of Royersford Borough. Please state the pipe size, material type, and whether it is gravity-flow pipe or force main.

**RESPONSE**

The Township has informed Aqua that the 750 feet of wastewater pipe to be acquired in the northeast corner of Royersford Borough is 8" diameter terra cotta gravity sewer pipe.

Respondent: Khaled Hassan, P.E.  
Date: 06/28/2017

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-2** Please separately quantify the total lengths of gravity-flow pipe and force main, and the total manhole count for each of Limerick Township's (Limerick's) two wastewater systems.

**RESPONSE**

Please see the summary below.

**King Road WWTF Basin**

Gravity-flow Pipe Total	355,079 feet
Force Main Pipe Total	34,071 feet
Manhole Total	1,465 manholes

**Possum Hollow WWTF Basin**

Gravity-flow Pipe Total	90,997 feet
Force Main Pipe Total	9,518 feet
Manhole Total	379 manhole

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

**A-3** The total number of pump stations which Aqua-WD will acquire from Limerick is unclear in the Application. Please clarify the total number of pump stations to be acquired from Limerick as well as separately identify and list the stations that exist and those that are proposed.

**RESPONSE**

A total of 17 pump stations will be acquired from Limerick Township. The following is a list of the 17 existing pump stations and the one proposed pump station:

<b>Pump Station No.</b>	<b>Drainage Area<sup>1</sup></b>	<b>Existing?</b>	<b>Proposed?</b>
1	Possum Hollow	Yes	No
16	Possum Hollow	Yes	No
17	Possum Hollow	Yes	No
18	Possum Hollow	Yes	No
2	King Road	Yes	No
3	King Road	Yes	No
4	King Road	Yes	No
5	King Road	Yes	No
6A	King Road	Yes	No
7	King Road	Yes	No
10	King Road	Yes	No
12	King Road	Yes	No
13	King Road	Yes	No
14	King Road	Yes	No
15	King Road	Yes	No
19	King Road	Yes	No
20	King Road	Yes	No
Sankey development proposed P.S.	King Road	No	Yes

<sup>1</sup> Drainage area refers to which treatment plant the flow from the subject pump station is directed.

Respondent: Khaled Hassan, P.E.  
Date: 06/28/2017

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-4** The Application's Exhibit A map identifies a proposed pump station near the requested territory's boundary Line Segment 53 which does not appear to be listed in the Exhibit W "Engineer's Assessment of Tangible Property". Please describe the proposed pump station and identify the pump station's estimated construction cost and date of construction completion.

**RESPONSE**

The proposed pump station will be a submersible pump station with Flygt N3102 – 5hp nonclog sewage pumps, duplex system with a grinder on the inlet. Pumps are rated at 223 GPM and will also have an emergency generator in the pump station building. The estimated cost of the pump station is \$590,000. The construction is estimated to be completed by the end of 2017.

Respondent: Mark J. Bubel, Sr., P.E.  
Date: 06/28/2017

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-5** Please describe the maintenance obligations related to grinder pumps on private properties for which Aqua-WD will liable per Section 2.04(a)(v) of the Application's Asset Purchase Agreement (APA).

**RESPONSE**

The operation and maintenance agreements for grinder pumps are included in the Application as CONFIDENTIAL Exhibit F. The maintenance obligations for the grinder pumps remain with the owners of the grinder pumps.

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

**A-6** Please state whether each of the Pending Development Plans (PDP) identified in Schedule 4.19 of the Application's APA have Act 537 Official Sewage Facilities Planning approval from the Department of Environmental Protection (DEP).

**RESPONSE**

Please see the below table:

<b>Residential Pending or Approved Land Development Plans (PDP)</b>	<b>Has PDP Received Act 537 DEP Sewage Facilities Planning Module Approval? Yes / No</b>
Ely Subdivision(fruitville & smith)	Yes
Sankey Residential (91)	Yes
28 Brownback Road (4)	Yes
Sankey Tract- Mark Quigley's (186 Towns)	No
Moscarello (292 W. Ridge) 72 Towns	No
<b>Commerical Pending or Approved Land Development Plans</b>	
100 W . Ridge Pike (Mazzamuto)	Yes
10th Ave 3620 retail pad (CR-4)	Yes
Evan's Industrial 394 W. Linfield Road, 125,000 SF	Yes
Sams Club/Wal mart	No
Micro Coax- 206 Jones Blvd (on bold)	Yes
1310 Main St. 6676 Pub/tavern	No
Carr- Penn Road 5000 SF Warehouse	Not Required
Crouse Building 826 N. Lewis Road	Not Required
Hampton Inn- 4,380 SF Restaurant Pad	Yes

Linfield Corp. Ctr Lot 59 & 60	Yes
Redgo- Phase 1 (49,000 SF commercial)	Yes
Redgo- Phase 2 (AQC)	Yes
Redgo- Phase 2 (20,000 SF Commercial)	Yes
Grass Sports	Exemption Granted
Sanatoga Springs Lot 2 Ph 2 & 3	Exemption Granted
J&D Thomas (2576 SF Office)	Exemption Granted
West Mont Soccer	Exemption Granted
Sankey Tract- Mark Quigley's Senior care (156 ILU + 152 ALU)	No
Sankey Tract- Mark Quigley's MS Commercial ( 18K SF comm.+14K SF drugstore+32 Apts)	No



Respondent: William C. Packer  
Date: 06/28/2017

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-7** Please quantify how the payment of \$400,000 identified in Section 7.10 of the Application's APA was calculated and provide any supporting documentation justifying the payment amount.

**RESPONSE**

The \$400,000 payment is a contract term negotiated between the buyer and the seller. The payment is to provide for work done by seller related to developments moving forward between the date of the agreement and closing.

Respondent: Khaled Hassan, P.E.

Date: 06/28/2017

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

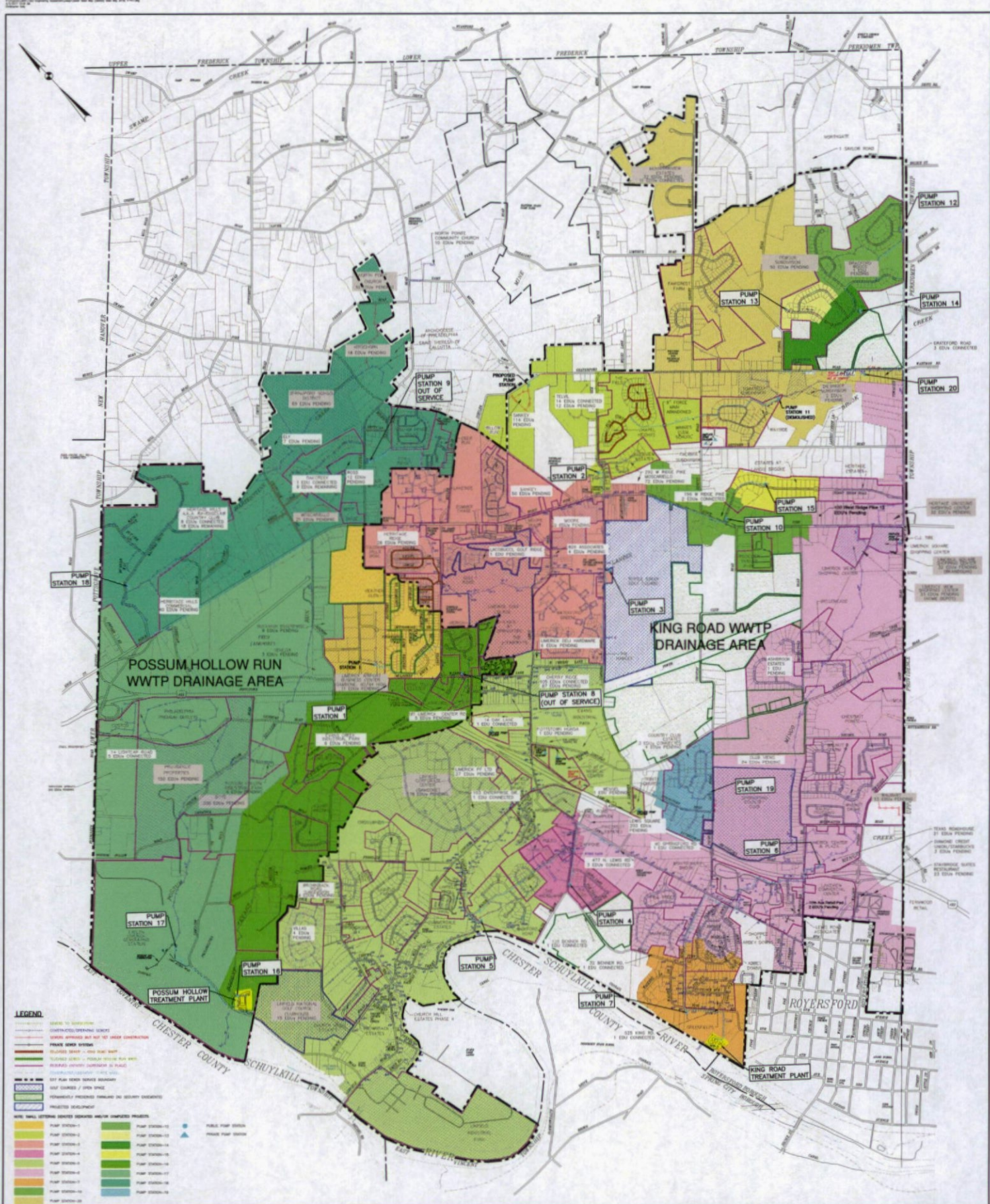
**DATA REQUEST 1**

---

**A-8** Please provide a map identifying the PDP locations identified in Schedule 4.19 of the Application's APA.

**RESPONSE**

Please see the attached map. A full size copy of the map is being filed with the Office of the Secretary of the Public Utility Commission and provided to the Bureau of Technical Utility Services, the Bureau of Investigation and Enforcement, the Office of Consumer Advocate and the Office of Small Business Advocate.



**LEGEND**

DASHED LINE: SEWER TO SUBSTITUTION  
 SOLID LINE: DEDICATED SEWER SERVICE  
 THICK SOLID LINE: SEWER SERVICE NOT TO BE USED FOR OTHER CONSTRUCTION  
 THIN SOLID LINE: PRIVATE SEWER SERVICE  
 THICK SOLID LINE: SEWER SERVICE - 1500 TO 2400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 100 TO 1500 GPD  
 THICK SOLID LINE: SEWER SERVICE - 2400 TO 4800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 100 TO 2400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 4800 TO 9600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 2400 TO 4800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 9600 TO 19200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 4800 TO 9600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 19200 TO 38400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 9600 TO 19200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 38400 TO 76800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 19200 TO 38400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 76800 TO 153600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 38400 TO 76800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 153600 TO 307200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 76800 TO 153600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 307200 TO 614400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 153600 TO 307200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 614400 TO 1228800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 307200 TO 614400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 1228800 TO 2457600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 614400 TO 1228800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 2457600 TO 4915200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 1228800 TO 2457600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 4915200 TO 9830400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 2457600 TO 4915200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 9830400 TO 19660800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 4915200 TO 9830400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 19660800 TO 39321600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 9830400 TO 19660800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 39321600 TO 78643200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 19660800 TO 39321600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 78643200 TO 157286400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 39321600 TO 78643200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 157286400 TO 314572800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 78643200 TO 157286400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 314572800 TO 629145600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 157286400 TO 314572800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 629145600 TO 1258291200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 314572800 TO 629145600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 1258291200 TO 2516582400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 629145600 TO 1258291200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 2516582400 TO 5033164800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 1258291200 TO 2516582400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 5033164800 TO 10066329600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 2516582400 TO 5033164800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 10066329600 TO 20132659200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 5033164800 TO 10066329600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 20132659200 TO 40265318400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 10066329600 TO 20132659200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 40265318400 TO 80530636800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 20132659200 TO 40265318400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 80530636800 TO 161061273600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 40265318400 TO 80530636800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 161061273600 TO 322122547200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 80530636800 TO 161061273600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 322122547200 TO 644245094400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 161061273600 TO 322122547200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 644245094400 TO 1288490188800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 322122547200 TO 644245094400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 1288490188800 TO 2576980377600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 644245094400 TO 1288490188800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 2576980377600 TO 5153960755200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 1288490188800 TO 2576980377600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 5153960755200 TO 10307921510400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 2576980377600 TO 5153960755200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 10307921510400 TO 20615843020800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 5153960755200 TO 10307921510400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 20615843020800 TO 41231686041600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 10307921510400 TO 20615843020800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 41231686041600 TO 82463372083200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 20615843020800 TO 41231686041600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 82463372083200 TO 164926744166400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 41231686041600 TO 82463372083200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 164926744166400 TO 329853488332800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 82463372083200 TO 164926744166400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 329853488332800 TO 659706976665600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 164926744166400 TO 329853488332800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 659706976665600 TO 1319413953331200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 329853488332800 TO 659706976665600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 1319413953331200 TO 2638827906662400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 659706976665600 TO 1319413953331200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 2638827906662400 TO 5277655813324800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 1319413953331200 TO 2638827906662400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 5277655813324800 TO 10555311626649600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 5277655813324800 TO 10555311626649600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 10555311626649600 TO 21110623253299200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 10555311626649600 TO 21110623253299200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 21110623253299200 TO 42221246506598400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 21110623253299200 TO 42221246506598400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 42221246506598400 TO 84442493013196800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 42221246506598400 TO 84442493013196800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 84442493013196800 TO 168884986026393600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 84442493013196800 TO 168884986026393600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 168884986026393600 TO 337769972052787200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 168884986026393600 TO 337769972052787200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 337769972052787200 TO 675539944105574400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 337769972052787200 TO 675539944105574400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 675539944105574400 TO 1351079888211148800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 675539944105574400 TO 1351079888211148800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 1351079888211148800 TO 2702159776422297600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 1351079888211148800 TO 2702159776422297600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 2702159776422297600 TO 5404319552844595200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 2702159776422297600 TO 5404319552844595200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 5404319552844595200 TO 10808639105689190400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 5404319552844595200 TO 10808639105689190400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 10808639105689190400 TO 21617278211378380800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 10808639105689190400 TO 21617278211378380800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 21617278211378380800 TO 43234556422756761600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 21617278211378380800 TO 43234556422756761600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 43234556422756761600 TO 86469112845513523200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 43234556422756761600 TO 86469112845513523200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 86469112845513523200 TO 172938225691027046400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 86469112845513523200 TO 172938225691027046400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 172938225691027046400 TO 345876451382054092800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 172938225691027046400 TO 345876451382054092800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 345876451382054092800 TO 691752902764108185600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 345876451382054092800 TO 691752902764108185600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 691752902764108185600 TO 1383505805528216371200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 691752902764108185600 TO 1383505805528216371200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 1383505805528216371200 TO 2767011611056432742400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 1383505805528216371200 TO 2767011611056432742400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 2767011611056432742400 TO 5534023222112865484800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 2767011611056432742400 TO 5534023222112865484800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 5534023222112865484800 TO 11068046444225730969600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 5534023222112865484800 TO 11068046444225730969600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 11068046444225730969600 TO 22136092888451461939200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 11068046444225730969600 TO 22136092888451461939200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 22136092888451461939200 TO 44272185776902923878400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 22136092888451461939200 TO 44272185776902923878400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 44272185776902923878400 TO 88544371553805847756800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 44272185776902923878400 TO 88544371553805847756800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 88544371553805847756800 TO 177088743107611695513600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 88544371553805847756800 TO 177088743107611695513600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 177088743107611695513600 TO 354177486215223391027200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 177088743107611695513600 TO 354177486215223391027200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 354177486215223391027200 TO 708354972430446782054400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 354177486215223391027200 TO 708354972430446782054400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 708354972430446782054400 TO 1416709944860893564108800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 708354972430446782054400 TO 1416709944860893564108800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 1416709944860893564108800 TO 2833419889721787128217600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 1416709944860893564108800 TO 2833419889721787128217600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 2833419889721787128217600 TO 5666839779443574256435200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 2833419889721787128217600 TO 5666839779443574256435200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 5666839779443574256435200 TO 11333679558887148512870400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 5666839779443574256435200 TO 11333679558887148512870400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 11333679558887148512870400 TO 22667359117774297025740800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 11333679558887148512870400 TO 22667359117774297025740800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 22667359117774297025740800 TO 45334718235548594051481600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 22667359117774297025740800 TO 45334718235548594051481600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 45334718235548594051481600 TO 90669436471097188102963200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 45334718235548594051481600 TO 90669436471097188102963200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 90669436471097188102963200 TO 181338872942194376205926400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 90669436471097188102963200 TO 181338872942194376205926400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 181338872942194376205926400 TO 362677745884388752411852800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 181338872942194376205926400 TO 362677745884388752411852800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 362677745884388752411852800 TO 725355491768777504823705600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 362677745884388752411852800 TO 725355491768777504823705600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 725355491768777504823705600 TO 1450710983537555009647411200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 725355491768777504823705600 TO 1450710983537555009647411200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 1450710983537555009647411200 TO 2901421967075110019294822400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 1450710983537555009647411200 TO 2901421967075110019294822400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 2901421967075110019294822400 TO 5802843934150220038589644800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 2901421967075110019294822400 TO 5802843934150220038589644800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 5802843934150220038589644800 TO 11605687868300440077178886400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 5802843934150220038589644800 TO 11605687868300440077178886400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 11605687868300440077178886400 TO 23211375736600880154357772800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 11605687868300440077178886400 TO 23211375736600880154357772800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 23211375736600880154357772800 TO 46422751473201760308715545600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 23211375736600880154357772800 TO 46422751473201760308715545600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 46422751473201760308715545600 TO 92845502946403520617431091200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 46422751473201760308715545600 TO 92845502946403520617431091200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 92845502946403520617431091200 TO 185691005892807041238862182400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 92845502946403520617431091200 TO 185691005892807041238862182400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 185691005892807041238862182400 TO 371382011785614082477724364800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 185691005892807041238862182400 TO 371382011785614082477724364800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 371382011785614082477724364800 TO 742764023571228164955448729600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 371382011785614082477724364800 TO 742764023571228164955448729600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 742764023571228164955448729600 TO 148552804714245628991097559200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 742764023571228164955448729600 TO 148552804714245628991097559200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 148552804714245628991097559200 TO 297105609428491257982195118400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 148552804714245628991097559200 TO 297105609428491257982195118400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 297105609428491257982195118400 TO 594211218856982515964390236800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 297105609428491257982195118400 TO 594211218856982515964390236800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 594211218856982515964390236800 TO 1188422437713965031928780473600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 594211218856982515964390236800 TO 1188422437713965031928780473600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 1188422437713965031928780473600 TO 2376844875427930063857560947200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 1188422437713965031928780473600 TO 2376844875427930063857560947200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 2376844875427930063857560947200 TO 4753689750855860127715121894400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 2376844875427930063857560947200 TO 4753689750855860127715121894400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 4753689750855860127715121894400 TO 9507379501711720255430243788800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 4753689750855860127715121894400 TO 9507379501711720255430243788800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 9507379501711720255430243788800 TO 19014759003423440510860487577600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 9507379501711720255430243788800 TO 19014759003423440510860487577600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 19014759003423440510860487577600 TO 38029518006846881021720975155200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 19014759003423440510860487577600 TO 38029518006846881021720975155200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 38029518006846881021720975155200 TO 76059036013693762043441950310400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 38029518006846881021720975155200 TO 76059036013693762043441950310400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 76059036013693762043441950310400 TO 152118072027387524086883900620800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 76059036013693762043441950310400 TO 152118072027387524086883900620800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 152118072027387524086883900620800 TO 304236144054775048173767801241600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 152118072027387524086883900620800 TO 304236144054775048173767801241600 GPD  
 THICK SOLID LINE: SEWER SERVICE - 304236144054775048173767801241600 TO 608472288109550096347535602483200 GPD  
 THIN SOLID LINE: SEWER SERVICE - 304236144054775048173767801241600 TO 608472288109550096347535602483200 GPD  
 THICK SOLID LINE: SEWER SERVICE - 608472288109550096347535602483200 TO 1216944576219100192695071204966400 GPD  
 THIN SOLID LINE: SEWER SERVICE - 608472288109550096347535602483200 TO 1216944576219100192695071204966400 GPD  
 THICK SOLID LINE: SEWER SERVICE - 1216944576219100192695071204966400 TO 2433889152438200385390142409932800 GPD  
 THIN SOLID LINE: SEWER SERVICE - 1216944576219100192695071204966400 TO 2433889152438200385390142409932800 GPD  
 THICK SOLID LINE: SEWER SERVICE - 2433889152438200385390142409932800 TO 4867778304876400770780284819865600 GPD  
 THIN SOLID LINE: SEWER SERVICE - 2433889152438200385390142409932800 TO

Respondent: William C. Packer

Date: 06/28/2017

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-9** Schedules 2.02(i) and 4.10 of the Application's APA state "(see also notations to asset list in data room)". Please clarify this statement and provide a copy of the referenced notations.

**RESPONSE**

The "notations to asset list in data room" are intended to supplement Schedule 2.02(i) – Excluded Assets. The only additional excluded asset is a Brush Hog for Mower. The "notations to asset list in data room" are also intended to supplement Schedule 4.10 – Equipment and Machinery. There are, however, no additional items of equipment or machinery for Schedule 4.10.

Respondent: Mark J. Bubel, Sr., P.E.  
Date: 06/28/2017

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-10** Please quantify in acres the real property listed in Schedule 4.09 of the Application's APA.

**RESPONSE**

**Schedule 4.09**

Real Property

<b>Property</b>	<b>Address</b>	<b>Owned by Twp. Parcel</b>	<b>Parcel Size, Acres</b>
King Road Wastewater Treatment Plant	529 King Rd	37-00-01267-00-1	10.13
North Limerick Road Pump Station (PS #2)	37 N. Limerick Rd	37-00-02352-00-5	0.13097
South Limerick Road Pump Station (PS #3)	302 S. Limerick Rd	37-00-02408-81-4	0.24277
Trinley Road Pump Station (PS #5)	64 Trinley Rd	37-00-05269-10-3	0.09183
King Road Pump Station (PS #7)	571 King Rd	37-00-01266-90-2	0.18540
Neiffer Rd (PS #9) decommissioned	62 Neiffer Rd	37-00-03175-04-6	0.12934
Township Line Pump Station (PS #12)	97 Bartlett Rd	37-00-05233-40-3	0.16129
Cambridge Drive Pump Station (PS #13)	3 Bradford	37-00-00350-81-9	0.06678
Bradford Woods (PS #14)	89 Bradford	37-00-00350-22-5	0.15418

Source: Montgomery County Tax Records

Respondent: William C. Packer  
Date: 06/28/2017

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-11** Section 7.10(b) of the Application's APA details potential EDU Fee Cash receipts. Please quantify the outstanding EDU Fee Cash from each respective source. Also, quantify the total amount of EDU Fee Cash Aqua-WD expects to receive from the collective sources and provide calculations or documentation supporting the amounts.

**RESPONSE**

There is no outstanding EDU Fee Cash currently. The amount future EDU Fee Cash is not known at this time.

Respondent: William C. Packer

Date: 06/28/2017

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-12**

Aqua-WD's current effective tariff specifies four classes of general metered service: residential, commercial, industrial, and public while Exhibit D from the Application's Exhibit U "Testimony of William C. Packer" indicates Limerick Township classified customers as Residential, Commercial, Apartment, School, Church, or Public. Please explain how Aqua-WD reclassified Limerick customers in compliance with its current effective tariff and quantify the number of Limerick customers to be assigned to each respective class.

**RESPONSE**

The classification of Apartments, Churches, and Schools are included in Commercial Class. The number of customers has already been provided in Exhibit U Testimony of William C. Packer, Exhibit D.

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

- A-13** Please explain why Herbert, Rowland & Grubic, Inc. (HRG) HRG used six percent as the state tax rate in Schedule F of the Application's Exhibit R "Fair Market Value - Appraisal Herbert, Rowland & Grubic, Inc."

**OBJECTION**

A-13 is one of three Data Requests of the Bureau of Technical Utility Services ("TUS") asking for information about the Fair Market Value Appraisal of Herbert, Rowland & Grubic, Inc. ("HRG"). As addressed further below, this is a contested proceeding in which TUS, the principal technical advisory bureau to the Public Utility Commission ("Commission"),<sup>1</sup> is not a party. While we have answered, without challenge, other TUS Data Requests as a courtesy to TUS, we decline to answer this Data Request and object to it for the several reasons that follow.

This Application proceeding is under Protest by the Office of Consumer Advocate ("OCA"). The Bureau of Investigation and Enforcement ("I&E"), the Commission's prosecutorial arm,<sup>2</sup> has intervened and is actively participating. With the filing of a formal Protest, the matter has been assigned to the Office of Administrative Law Judge with Administrative Law Judge Haas presiding. Evidentiary hearings are scheduled for July 20 and 21, 2017 with briefing, a recommended decision and final Commission decision to follow.

To date, the Office of Consumer Advocate has served 80 discovery requests and I&E has served 7 discovery requests with a five (5) day response time under a tightened time frame. A pre-hearing conference was held on June 28, 2017 where the parties held discussions on and off the record. In addition, at least one intervening party has had a telephone conference to discuss particular questions in the case.

The appraisal methodology of HRG and the HRG appraisal results are litigation issues that could be raised by I&E prosecutors and/or by OCA. I&E and OCA, in point of fact, have asked discovery about the HRG appraisal. Aqua has answered

---

<sup>1</sup> See *Implementation of Act 129 of 2008: Organization of Bureaus and Offices*, Docket No. M-2008-2071852, Final Procedural Order entered August 11, 2011 ("*Final Procedural Order*"), mimeo at 4.

<sup>2</sup> See *Final Procedural Order*, mimeo at 4 and 5.



the I&E and OCA discovery without waiving any objection it may seek to raise to the admissibility of evidence or the interpretation of Section 1329 at the hearing or briefing stages of the proceeding as explained in Judge Haas's discovery Order dated June 14, 2017.

With formal prosecution of the Application moving forward and appraisal methodology a possible contested issue in the proceeding, the effort of TUS, the advisory bureau, to also investigate appraisal methodology/results suggests an impermissible and illegal commingling of the Commission's prosecutorial and advisory/adjudicatory functions in violation of *Lyness v. Com., State Bd. of Medicine*, 529 Pa. 535, 605 A.2d 1204 (1992) and Section 308.2(b) of the Public Utility Code, 66 Pa.C.S. § 308.2(b), which expressly prohibits the commingling of the prosecutorial and advisory functions. Significantly, in this regard, the letter serving the Data Requests directs that Aqua provide copies of responses to the TUS Data Requests to I&E, the OCA and the Office of Small Business Advocate ("OSBA"). It is unclear how or why service upon I&E and the OCA is required. In addition, OSBA is not even intervened in the case.

Along with the foregoing, Aqua is also concerned with the possibility of improper and prejudicial *ex parte* communications, if, as it appears, TUS is taking on a prosecutorial function in this application proceeding. As an advisory bureau to the Commission, TUS would typically and likely communicate with Commissioner Offices. In a prosecutorial role, TUS would be prohibited from doing so but, yet, those communications could continue. Section 334 of the Public Utility Code, 66 Pa.C.S. § 334, prohibits *ex parte* communications in contested matters. On the other hand, if TUS is retaining its advisory function, any conversations between Aqua and TUS on any of the Data Requests could be considered *ex parte* communications.

Finally, TUS has no statutory authority to inquire of HRG in any event. HRG is a Utility Valuation Expert certified by the Commission to provide fair market value appraisals under Section 1329 of the Public Utility Code, 66 Pa.C.S. § 1329. HRG was engaged by Limerick Township to provide a Section 1329 fair market value appraisal of its wastewater system.

Through clear statutory language, Section 1329 creates a legislated process for establishing the fair market value of the Limerick Township wastewater system assets. The legislated process requires fair market value appraisals by utility valuation experts and a comparison of the fair market value appraisals to the negotiated purchase price. In this way, the public interest is protected. The process does not allow for TUS to involve itself in the decision making of the UVE.

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

- A-14** Please explain why HRG used an estimated number of customers Limerick will have in the year 2036 to determine the current estimated market value in Schedule D of the Application's Exhibit R "Fair Market Value - Appraisal Herbert, Rowland & Grubic, Inc." Also, please explain why the customer counts and purchase prices in the comparison of other wastewater system acquisitions were not adjusted to the respective 2036 values.

**OBJECTION**

A-14 is one of three Data Requests of the Bureau of Technical Utility Services ("TUS") asking for information about the Fair Market Value Appraisal of Herbert, Rowland & Grubic, Inc. ("HRG"). As addressed further below, this is a contested proceeding in which TUS, the principal technical advisory bureau to the Public Utility Commission ("Commission"),<sup>1</sup> is not a party. While we have answered, without challenge, other TUS Data Requests as a courtesy to TUS, we decline to answer this Data Request and object to it for the several reasons that follow.

This Application proceeding is under Protest by the Office of Consumer Advocate ("OCA"). The Bureau of Investigation and Enforcement ("I&E"), the Commission's prosecutorial arm,<sup>2</sup> has intervened and is actively participating. With the filing of a formal Protest, the matter has been assigned to the Office of Administrative Law Judge with Administrative Law Judge Haas presiding. Evidentiary hearings are scheduled for July 20 and 21, 2017 with briefing, a recommended decision and final Commission decision to follow.

To date, the Office of Consumer Advocate has served 80 discovery requests and I&E has served 7 discovery requests with a five (5) day response time under a tightened time frame. A pre-hearing conference was held on June 28, 2017 where the parties held discussions on and off the record. In addition, at least one intervening party has had a telephone conference to discuss particular questions in the case.

---

<sup>1</sup> See *Implementation of Act 129 of 2008: Organization of Bureaus and Offices*, Docket No. M-2008-2071852, Final Procedural Order entered August 11, 2011 ("*Final Procedural Order*"), mimeo at 4.

<sup>2</sup> See *Final Procedural Order*, mimeo at 4 and 5.

The appraisal methodology of HRG and the HRG appraisal results are litigation issues that could be raised by I&E prosecutors and/or by OCA. I&E and OCA, in point of fact, have asked discovery about the HRG appraisal. Aqua has answered the I&E and OCA discovery without waiving any objection it may seek to raise to the admissibility of evidence or the interpretation of Section 1329 at the hearing or briefing stages of the proceeding as explained in Judge Haas's discovery Order dated June 14, 2017.

With formal prosecution of the Application moving forward and appraisal methodology a possible contested issue in the proceeding, the effort of TUS, the advisory bureau, to also investigate appraisal methodology/results suggests an impermissible and illegal commingling of the Commission's prosecutorial and advisory/adjudicatory functions in violation of *Lyness v. Com., State Bd. of Medicine*, 529 Pa. 535, 605 A.2d 1204 (1992) and Section 308.2(b) of the Public Utility Code, 66 Pa.C.S. § 308.2(b), which expressly prohibits the commingling of the prosecutorial and advisory functions. Significantly, in this regard, the letter serving the Data Requests directs that Aqua provide copies of responses to the TUS Data Requests to I&E, the OCA and the Office of Small Business Advocate ("OSBA"). It is unclear how or why service upon I&E and the OCA is required. In addition, OSBA is not even intervened in the case.

Along with the foregoing, Aqua is also concerned with the possibility of improper and prejudicial *ex parte* communications, if, as it appears, TUS is taking on a prosecutorial function in this application proceeding. As an advisory bureau to the Commission, TUS would typically and likely communicate with Commissioner Offices. In a prosecutorial role, TUS would be prohibited from doing so but, yet, those communications could continue. Section 334 of the Public Utility Code, 66 Pa.C.S. § 334, prohibits *ex parte* communications in contested matters. On the other hand, if TUS is retaining its advisory function, any conversations between Aqua and TUS on any of the Data Requests could be considered *ex parte* communications.

Finally, TUS has no statutory authority to inquire of HRG in any event. HRG is a Utility Valuation Expert certified by the Commission to provide fair market value appraisals under Section 1329 of the Public Utility Code, 66 Pa.C.S. § 1329. HRG was engaged by Limerick Township to provide a Section 1329 fair market value appraisal of its wastewater system.

Through clear statutory language, Section 1329 creates a legislated process for establishing the fair market value of the Limerick Township wastewater system assets. The legislated process requires fair market value appraisals by utility valuation experts and a comparison of the fair market value appraisals to the negotiated purchase price. In this way, the public interest is protected. The process does not allow for TUS to involve itself in the decision making of the UVE.

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-15** Please separately explain why HRG did not include property taxes, regulatory assessments, and bad debt expenses in their income valuation.

**OBJECTION**

A-15 is one of three Data Requests of the Bureau of Technical Utility Services ("TUS") asking for information about the Fair Market Value Appraisal of Herbert, Rowland & Grubic, Inc. ("HRG"). As addressed further below, this is a contested proceeding in which TUS, the principal technical advisory bureau to the Public Utility Commission ("Commission"),<sup>1</sup> is not a party. While we have answered, without challenge, other TUS Data Requests as a courtesy to TUS, we decline to answer this Data Request and object to it for the several reasons that follow.

This Application proceeding is under Protest by the Office of Consumer Advocate ("OCA"). The Bureau of Investigation and Enforcement ("I&E"), the Commission's prosecutorial arm,<sup>2</sup> has intervened and is actively participating. With the filing of a formal Protest, the matter has been assigned to the Office of Administrative Law Judge with Administrative Law Judge Haas presiding. Evidentiary hearings are scheduled for July 20 and 21, 2017 with briefing, a recommended decision and final Commission decision to follow.

To date, the Office of Consumer Advocate has served 80 discovery requests and I&E has served 7 discovery requests with a five (5) day response time under a tightened time frame. A pre-hearing conference was held on June 28, 2017 where the parties held discussions on and off the record. In addition, at least one intervening party has had a telephone conference to discuss particular questions in the case.

The appraisal methodology of HRG and the HRG appraisal results are litigation issues that could be raised by I&E prosecutors and/or by OCA. I&E and OCA, in point of fact, have asked discovery about the HRG appraisal. Aqua has answered the I&E and OCA discovery without waiving any objection it may seek to raise to

---

<sup>1</sup> See *Implementation of Act 129 of 2008: Organization of Bureaus and Offices*, Docket No. M-2008-2071852, Final Procedural Order entered August 11, 2011 ("*Final Procedural Order*"), mimeo at 4.

<sup>2</sup> See *Final Procedural Order*, mimeo at 4 and 5.

the admissibility of evidence or the interpretation of Section 1329 at the hearing or briefing stages of the proceeding as explained in Judge Haas's discovery Order dated June 14, 2017.

With formal prosecution of the Application moving forward and appraisal methodology a possible contested issue in the proceeding, the effort of TUS, the advisory bureau, to also investigate appraisal methodology/results suggests an impermissible and illegal commingling of the Commission's prosecutorial and advisory/adjudicatory functions in violation of *Lyness v. Com., State Bd. of Medicine*, 529 Pa. 535, 605 A.2d 1204 (1992) and Section 308.2(b) of the Public Utility Code, 66 Pa.C.S. § 308.2(b), which expressly prohibits the commingling of the prosecutorial and advisory functions. Significantly, in this regard, the letter serving the Data Requests directs that Aqua provide copies of responses to the TUS Data Requests to I&E, the OCA and the Office of Small Business Advocate ("OSBA"). It is unclear how or why service upon I&E and the OCA is required. In addition, OSBA is not even intervened in the case.

Along with the foregoing, Aqua is also concerned with the possibility of improper and prejudicial *ex parte* communications, if, as it appears, TUS is taking on a prosecutorial function in this application proceeding. As an advisory bureau to the Commission, TUS would typically and likely communicate with Commissioner Offices. In a prosecutorial role, TUS would be prohibited from doing so but, yet, those communications could continue. Section 334 of the Public Utility Code, 66 Pa.C.S. § 334, prohibits *ex parte* communications in contested matters. On the other hand, if TUS is retaining its advisory function, any conversations between Aqua and TUS on any of the Data Requests could be considered *ex parte* communications.

Finally, TUS has no statutory authority to inquire of HRG in any event. HRG is a Utility Valuation Expert certified by the Commission to provide fair market value appraisals under Section 1329 of the Public Utility Code, 66 Pa.C.S. § 1329. HRG was engaged by Limerick Township to provide a Section 1329 fair market value appraisal of its wastewater system.

Through clear statutory language, Section 1329 creates a legislated process for establishing the fair market value of the Limerick Township wastewater system assets. The legislated process requires fair market value appraisals by utility valuation experts and a comparison of the fair market value appraisals to the negotiated purchase price. In this way, the public interest is protected. The process does not allow for TUS to involve itself in the decision making of the UVE.

Respondent: William C. Packer  
Date: 06/28/2017

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-16** Please identify if all purchased property is exempt from the public utility realty tax. If any property is not exempt, please estimate the annual public utility realty tax expense.

**RESPONSE**

All sewer property is exempt from public utility realty tax.

**APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2017-2605434**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**DATA REQUEST 1**

---

**A-18** Please quantify how the 0.50% bad debt expense located in Exhibits C and D of the of the Application’s Exhibit U “Testimony of William C. Packer” was calculated. Also, please provide a calculation of Aqua-WD’s bad debt expense relative to operating revenue for each of the last three years.

**RESPONSE**

Aqua Pennsylvania Wastewater, Inc.’s bad debt ratio for the last three years is as follows:

	<u>2016</u>	<u>2015</u>	<u>2014</u>
Wastewater Revenue	\$12,114,548	\$12,065,675	\$11,557,040
Bad Debt Expense	\$130,251	\$143,136	\$125,271
Bad Debt Ratio	1.08%	1.19%	1.08%

Please see the response to A-17 for further explanation of the bad debt expense factor.

**VERIFICATION**

I, Mark J. Bubel, Sr., Senior Project Engineer of Aqua Services, Inc., hereby state that the facts set forth in my responses to the Bureau of Technical Utility Services Data Request 1 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).



Mark J. Bubel, Sr.  
Senior Project Engineer  
Aqua Services, Inc.

RECEIVED  
2011 JUN 28 PM 4:27  
PA PUC  
SECRETARY'S BUREAU  
FRONT DESK



**VERIFICATION**

I, Khaled R. Hassan, Associate Vice President of Pennoni Associates, Inc., hereby state that the facts set forth in my responses to the Bureau of Technical Utility Services Data Request 1 (A-2, A-4, A-6, and A-8) 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).

*Khaled Hassan*

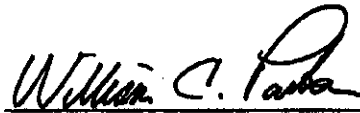
Khaled R. Hassan  
Associate Vice President  
Pennoni Associates, Inc.

6/28/17

RECEIVED  
2017 JUN 28 PM 4:27  
PA PUC  
SECRETARY'S BUREAU  
FRONT DESK

**VERIFICATION**

I, William C. Packer, Vice President – Controller of Aqua Pennsylvania, Inc., hereby state that the facts set forth in my responses to the Bureau of Technical Utility Services Data Request 1 are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



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

RECEIVED  
2017 JUN 28 PM 4:27  
PA PUC  
SECRETARY'S BUREAU  
FRONT DESK

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**The Honorable Steven K. Haas, Presiding**

**Application of Aqua Pennsylvania Wastewater, Inc., : Docket No. A-2017-2605434**  
**pursuant to Sections 1102 and 1329 of the Public Utility :**  
**Code for: (1) approval of the acquisition by Aqua of the :**  
**wastewater system assets of Limerick Township situated :**  
**within a portion of Limerick Township and within a portion :**  
**of the Borough of Royersford, Montgomery County, :**  
**Pennsylvania; (2) approval of the right of Aqua to begin to :**  
**offer, render, furnish and supply wastewater service to the :**  
**public in a portion of Limerick Township, Montgomery :**  
**County, Pennsylvania; and (3) an order approving the :**  
**acquisition that includes the ratemaking rate base of the :**  
**Limerick Township wastewater system assets pursuant to :**  
**Section 1329(c)(2) of the Public Utility Code :**

**RECEIVED**  
**2017 JUN 28 PM 4:27**  
**PA PUC**  
**SECRETARY'S BUREAU**  
**FRONT DESK**

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 28<sup>th</sup> day of June, 2017, served a true and correct copy of responses to the Bureau of Technical Utility Services Data Request 1, Nos. A-1 through A-12 and A-16 through A-18 and objections to Data Request 1, Nos. A-13 through A-15, upon the persons and in the manner set forth below:

**VIA HAND DELIVERY**

Christine Maloni Hoover  
Erin L. Gannon  
Senior Assistant Consumer Advocates  
Office of Consumer Advocate  
555 Walnut Street, Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
choover@paoca.org  
egannon@paoca.org

Carrie B. Wright, Prosecutor  
Phillip Kirchner, Prosecutor  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265  
carwright@pa.gov  
phikirchne@pa.gov

John Evans, Small Business Advocate  
Office of Small Business Advocate  
300 North Second Street, Suite 202  
Harrisburg, PA 17102

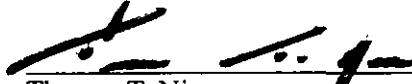
VIA OVERNIGHT DELIVERY

Thomas S. Wyatt, Esquire  
Ditworth Paxson LLP  
1500 Market Street  
Suite 3500E  
Philadelphia, PA 19102  
twyatt@dilworthlaw.com

Glenn Watkins  
Technical Associates, Inc.  
1503 Santa Rosa Road  
Suite 130  
Richmond, VA 23229  
watkinsg@tai-econ.com

RECEIVED  
2017 JUN 28 PM 4: 27

PA PUC  
SECRETARY'S BUREAU  
FRONT DESK



---

Thomas T. Niesen  
PA Attorney ID No. 31379

**NO SCANNED IMAGES ARE  
AVAILABLE FOR OVERSIZED  
MAPS OR PLANS**

**MAPS AND PLANS  
MAY BE VIEWED IN THE  
COMMISSION'S  
FILE ROOM**