



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265, HARRISBURG, PA 17105-3265

IN REPLY PLEASE
REFER TO OUR FILE

August 11, 2017

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

Re: 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
Docket No. A-2017-2605434

Dear Secretary Chiavetta:

Enclosed please find the Bureau of Investigation and Enforcement's (I&E) **Main Brief** in the above-captioned proceeding.

Copies are being served on parties as identified in the attached certificate of service. If you have any questions, please contact me at (717) 783-6156.

Sincerely,

Carrie B. Wright
Prosecutor
Bureau of Investigation and Enforcement
PA Attorney I.D. #208185

CBW/snc
Enclosure

cc: Certificate of Service
ALJ Steven Haas

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**MAIN BRIEF
OF THE
BUREAU OF INVESTIGATION AND ENFORCEMENT**

Carrie B. Wright
Prosecutor
PA Attorney ID No. 208182

Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Dated: August 11, 2017

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I. STATEMENT OF THE CASE

A. Introduction

By Secretarial Letter dated May 31, 2017, the Pennsylvania Public Utility Commission (“Commission”) acknowledged receipt of the Application of Aqua Pennsylvania Wastewater, Inc. (“Aqua” or “Company”) for approval of: 1) the acquisition of the wastewater systems assets of Limerick Township situated within a portion of Limerick Township and within a portion of the Borough of Royersford, Montgomery County, Pennsylvania, 2) 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) for 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.

B. History of the Proceeding

As noted above, on May 31, 2017, the Commission acknowledged receipt of the instant Application. On June 9, 2017, the Bureau of Investigation and Enforcement (“I&E”) filed a Notice of Appearance. Also on June 9, 2017, the Office of Consumer Advocate (“OCA”) filed a Protest in this proceeding. On June 21, 2017, counsel for Limerick Township filed a Notice of Appearance in the instant proceeding.

A Prehearing Conference was held on June 28, 2017, with Administrative Law Steven K. Haas (“ALJ”) presiding. A litigation schedule was developed that provided for the filing of testimony, hearings and briefs as follows:

Direct testimony of other parties	July 3, 2017
Rebuttal testimony	July 11, 2017
Surrebuttal testimony	July 18, 2017
Evidentiary hearing (with oral rejoinder)	July 20-21, 2017
Main Briefs	August 11, 2017
Reply Briefs	August 18, 2017

ALJ Haas conducted evidentiary hearings on July 20, 2017. At the hearing, testimony and exhibits were entered into the record and cross examination was conducted. I&E Statements Nos. 1 and 2 (with accompanying exhibits) and I&E Statement Nos. 1-SR and 2-SR were entered into the evidentiary record. Pursuant to the procedural schedule and in accordance with Commission regulations at Section 5.501, I&E submits this Main Brief.

II. LEGAL STANDARDS

A. Burden of Proof

The Public Utility Code (“Code”) mandates that the party seeking affirmative relief from the Commission bears the burden of proof.¹ To satisfy that burden, there is a duty to demonstrate by a preponderance of the evidence that the proposed transaction complies with Pennsylvania law.² Therefore, as the party requesting relief, the Applicant has the burden of proving that the proposed transaction satisfies Sections 1102, 1103, and 1329 of the Code.

¹ 66 Pa. C.S. § 332(a).

² *Samuel J. Lansberry, Inc. v. Pa. PUC*, 578 A.2d 600, 602 (Pa. Commw. 1990).

B. Standard for Approval

The Code requires that the Commission issue a Certificate of Public Convenience as a prerequisite to offering service, abandoning service and certain property transfers by public utilities or their affiliated interests.³

The standards for the issuance of a Certificate of Public Convenience are set forth in Sections 1102 and 1103 of the Code.⁴ A Certificate of Public Convenience shall be granted “only if the commission shall find or determine that the granting of such certificate is necessary or proper for the service, accommodation, convenience or safety of the public.”⁵ These provisions have been interpreted by the Pennsylvania Supreme Court in the *City of York v. Pennsylvania Public Utility Commission* for the proposition that to establish that a proposed transaction benefits the public, it must be shown to affirmatively promote the service, accommodation, convenience or safety of the public in some substantial way.⁶ To ensure that a transaction is in the public interest, the Commission may impose conditions on granting a Certificate of Public Convenience as it may deem to be just and reasonable.⁷

Section 1329 of the Code is a newly enacted statute which prescribes the process used to determine the fair market value of a municipal utility that is the subject of an acquisition. Section 1329 provides a framework for valuing, for ratemaking purposes, water and wastewater systems that are owned by a municipal corporation or authority that

³ 66 Pa. C.S. § 1102(a).

⁴ 66 Pa.C.S. §§ 1102, 1103.

⁵ 66 Pa. C.S. § 1103(a).

⁶ *City of York v. Pa. PUC*, 449 Pa. 136, 295 A.2d 825, 828 (1972).

⁷ 66 Pa. C.S. § 1103(a).

are to be acquired by an investor-owned water or wastewater utility under the Commission's jurisdiction. It allows the rate base of the municipal system being purchased to be incorporated into the rate base of the purchasing investor-owned utility at the lesser of either the purchase price or the fair market value as established by the two independent appraisals conducted by two utility valuation experts ("UVE").

Aqua has failed to demonstrate that its Application meets the criteria that it serves the public interest within the meaning of Sections 1102 and 1103 of the Code. Aqua, additionally, has failed to show that its proposal to split the rate base resulting from this proceeding into a rate base amount of \$60,000,000 and a \$15,100,000 regulatory asset is in the public interest. Furthermore, Aqua has not sought requisite approvals under Section 507 of the Code (pertaining to contracts between public utilities and municipalities), which is a fatal error to this transaction.

III. SUMMARY OF THE ARGUMENT

Aqua is seeking to acquire the Limerick system, which is a wastewater system that provides sewage collection and treatment services to approximately 5,434 customers within portions of Limerick Township. The Application, as filed, is not in the public interest. The Company has not alleged any substantial, affirmative public benefits that will be produced by the acquisition as required by *City of York*.⁸

Because the information contained within this filing is insufficient to establish that the acquisition is in the public interest and will result in affirmative benefits to Aqua's

⁸ *City of York v. Pa. PUC*, 449 Pa. 136, 295 A.2d 825, 828 (1972).

existing customers, I&E recommends that the Application be rejected. Furthermore, the deficiencies contained within the filing rendered I&E unable to determine whether the fair market value presented by Aqua is the appropriate amount to be placed into rate base in the Company's next base rate case.

In the alternative, should the Commission approve Aqua's Application, I&E respectfully requests that that the Commission require Aqua to provide a separate cost of service study ("COSS") for the Limerick system in its next base rate filing as the Company has indicated that the other Aqua ratepayers will be subsidizing the Limerick customers.

IV. ARGUMENT

A. Aqua's Acquisition is Contrary to the Public Interest

1. The Acquisition of the Limerick System Will Harm Aqua and Its Current Ratepayers.

As testified to by I&E Witness Apetoh, the proposed acquisition of the Limerick System by Aqua will have a negative impact on Aqua's current financial condition and will negatively impact Aqua's current customers due to both the purchase cost and the proposed rate stabilization plan.

Aqua's financial condition will be jeopardized because its positive net income will deteriorate to a negative if this transaction is approved. Per documentation provided by Aqua, the Company had a net income of approximately \$3.0 million dollars in 2016.⁹ Under Aqua's proposed rate stabilization plan, the Limerick System will be operated at a

⁹ Aqua Exhibit D – Income Statement.

loss of \$4.7 million dollars in 2018.¹⁰ This means that Aqua’s proposed operation of the Limerick System will create a deficit of \$1.7 million dollars, turning Aqua’s net income from positive to almost two million dollars in the negative. As such, this acquisition is imprudent and contrary to the public interest as it significantly harms the financial health of the Company.

Similarly, Aqua’s existing customers will be harmed because, according to the Company’s estimates, the total cost to existing Aqua customers resulting from this acquisition over a ten year period will be approximately \$27.8 million.

Section 1329 defines a rate stabilization plan as “[a] plan that will hold rates constant or phase rates in over a period of time after the next base rate case.”¹¹ Aqua has proposed a stabilization plan that commits the Company to “charg[ing] the same rates as those previously charged by the Township for a period of not less than three years.”¹² Considering the deficit outlined in the foregoing section and the proposed rate stabilization plan outlined in Aqua’s filing, the deficit created by Aqua’s acquisition of the Limerick system must be subsidized by other customers.¹³

As filed, there will be a \$7.778 million revenue shortfall created by the Limerick system by 2019.¹⁴ Given that the Company has committed to holding Limerick rates constant for at least three years¹⁵, this will necessitate other Aqua customers to subsidize

¹⁰ I&E Exhibit No. 1, Sch. No. 1, p. 1, Column B, Line 8.

¹¹ 66 Pa. C.S. § 1329(g).

¹² Aqua St. No. 1, p. 8.

¹³ I&E Statement No. 1, p. 8 *referencing* I&E Exhibit No. 1, Sch. No. 1, Column C, Line 12.

¹⁴ *Id.*

¹⁵ Aqua St. No. 1, p. 8.

this shortfall. Such subsidization is entirely unwarranted and causes financial harm to current Aqua customers. This harm is contrary to the public interest and warrants the rejection of this acquisition by the Commission. As noted by I&E Witness Apetoh, per the Company's rate stabilization plan, the Company is not projecting an increase for the Limerick system until 2021.¹⁶ In that year, the Company projects to double the revenue from this system.¹⁷ It must be assumed that Aqua will do this by doubling Limerick's rates. However, even when the rates for Limerick are doubled four years from now, Aqua's existing customers will still bear the burden of a \$3 million revenue shortfall for the Limerick System.¹⁸

Ultimately this loss will likely be a contributing factor in Aqua's decision to file a base rate case. While increasing rates is appropriate to ensure that utilities are able to continue to provide safe and reliable service, it is not in the public interest to increase rates because Aqua acquired the Limerick System that, as described below, does not need to be acquired and operated it at a loss for current customers to subsidize. As noted by I&E Witness Apetoh, Aqua has not indicated that it will absorb any of the revenue shortfall created by this acquisition, but instead will spread this to all existing Aqua customers.¹⁹ By placing itself in this position, Aqua is almost guaranteeing that it will have to file a rate case so that its current customers can subsidize a well performing,

¹⁶ I&E St. No. 1, p. 9.

¹⁷ Aqua St. No 1, Workpaper Exh. C.

¹⁸ I&E St. No. 1, p. 10.

¹⁹ I&E St. No. 1, pp. 9-10.

financially stable municipal utility. This is certainly no benefit to Aqua's current customers.

The potential for cross-subsidization is further highlighted by the high level of rate base per customer for the Limerick system as compared to Aqua's existing system. The ratio of rate base per customer for the Limerick system is approximately \$13,820, while the rate base per customer of Aqua's existing system is \$3,714.²⁰ The rate base per customer of the Limerick System is approximately 3.7 times higher than that of Aqua's existing system. This disparity is important to note because it is one more factor that points to the subsidization of Limerick by existing customers. This overall increase in rate base will lead to higher rates through more return dollars and depreciation expense than would occur in a base rate case without the acquisition of Limerick. Further, because Aqua is operating this system at a loss, rates for existing Aqua customers will be even higher to cover this shortfall.

Because the long and short term revenue impacts to the Company and its existing customers are significant, I&E recommends that the application be denied. It is inappropriate to ask current Aqua customers to subsidize and well performing, financially well situated municipal utility for the foreseeable future.

2. The Acquisition Does Not Provide the Requisite Affirmative Public Benefits to Aqua's Existing Customers.

As noted above, in an acquisition proceeding, a Certificate of Public Convenience will be granted "only if the commission shall find or determine that the granting of such

²⁰ I&E St. No. 1, p. 17

certificate is necessary or proper for the service, accommodation, convenience or safety of the public.”²¹ Further, in the *City of York v. Pennsylvania Public Utility Commission*, it was established that in order to show that a proposed transaction benefits the public, it must be shown to affirmatively promote the service, accommodation, convenience or safety of the public in some substantial way.²² Aqua has made unquantified and generalized assertions that current customers will benefit from the economies of scale, but I&E submits that this is simply insufficient to show any affirmative public benefits. Aqua Witness Packer merely states:

The NGSAs customers will become part of a larger-scale, efficiently operated, wastewater utility that over time will likely yield further operating efficiencies.²³

As regards the existing Aqua customers Witness Packer says only that:

By virtue of the Company’s larger customer base, future infrastructure investments across the state will be shared at a lower incremental cost per customer....²⁴

He further states:

...future incremental growth will be able to be accommodated utilizing the current sewer utility treatment infrastructure. This will further spread the cost of service across even more customers and improve the economies of scale.²⁵

The benefits alleged by Aqua are largely unsubstantiated. This does not equate to the showing of substantial affirmative public benefits as required by the *City of York*

²¹ 66 Pa. C.S. § 1103(a).

²² *City of York v. Pa. PUC*, 449 Pa. 136, 295 A.2d 825, 828 (1972).

²³ Aqua St. No. 1, p. 9.

²⁴ Aqua St. No. 1, p. 10.

²⁵ *Id.*

standard. Vague assertions of what is “likely” to occur fail to result in an affirmative public benefit. In order for this acquisition to be in the public interests, there must be benefits for Aqua's existing customers. The Commission simply cannot rely on Aqua’s vague assertions that there may be some operational efficiencies to determine that this acquisition is in the public interest and provides substantial, affirmative public benefits. Aqua has alleged no affirmative benefits to its existing customers, and therefore, this Application must be rejected.

As explained above, Aqua will be operating this system at a loss. OCA Witness Ashely Everette notes:

Mr. Packer does not testify to any cost reductions or efficiencies that will be produced by the Limerick acquisition. Generally for utilities, acquisitions increase economies of scale because fixed costs can be spread to more customers. However, as Mr. Packer testified to...Limerick customers will not even be covering their full cost of service under Aqua ownership...Therefore, they cannot make any contribution to the overall fixed costs.²⁶

She further states that:

Limerick’s system is much larger than many wastewater utilities in Pennsylvania, in terms of both number of customers and annual revenue...The financial statements indicate that Limerick’s sewer system is in good financial shape and that the management has appropriately planned for needed capital improvements.²⁷

The result of this acquisition for both Limerick and Aqua’s existing customers is that their rates will go up. According to Aqua Witness Packer, the target rate for the Limerick

²⁶ OCA St. No. 1, pp. 14-15.

²⁷ OCA St. No. 1, p. 10

customers would be approximately \$70 per month,²⁸ which is almost double the current rate of \$38 per month. Further, Aqua's current customers would see an increase of approximately \$2 per year to \$17 per year.²⁹ As noted by OCA, this is significant because even if one takes into account all the future growth that Aqua indicates makes the acquisition valuable, the existing Aqua customers are still realizing no cost benefits and are, in fact experiencing an increase to their rates as a result of this transaction.³⁰ Further, Mr. Packer has provided a schedule that shows that in year 16 existing customers might realize a savings of \$0.03 per month.³¹ The potential to save three cents per month, 15 years after potentially increasing customer rates, simply does not qualify as a substantial, affirmative public benefit.

In fact, as noted above, Limerick is currently well-run and financially sound. Therefore, it seems there will be no benefit to the Limerick customers as a result of this transaction either.

Aqua's application poses identifiable detriments to existing customers. The detriment imposed upon existing customers is relevant because, in its public interest analysis, the Commission should consider the benefits and **detriments** of the transaction "with respect to the impact on all affected parties"³² including existing customers. Accordingly, considering that the identified detriments of the transaction far outweigh any speculative benefits that existing ratepayers may hope to receive, I&E submits that

²⁸ Aqua St. 1, p. 14.

²⁹ OCA St. No. 1, p. 12.

³⁰ OCA St. No. 1, pp. 12-13.

³¹ OCA St. No. 1S, p. 3.

³² *Middletown Twp. v. Pa. P.U.C.*, 482 A.2d 674, 682 (Pa. Commw. 1984) (emphasis added).

Aqua's Application fails the public interest test and it should be rejected. The Limerick system is a large, well-functioning waste water system that is in sound financial condition. The instant acquisition presents merely speculative public benefits to Limerick and Aqua's existing customers. However, the detriments imposed are real and identifiable. Therefore, I&E believes the acquisition is not in the public interest and should not be approved.

B. In the Alternative, if this Acquisition is Approved, the Entirety of the Limerick Plant Should be Placed into Rate Base and Not into a Regulatory Asset

Aqua's proposal includes the inappropriate use of a cost-recovery mechanism that the Company incorrectly labels a regulatory asset. Specifically, Aqua is proposing to immediately place \$60 million into rate base while deferring approximately \$15 million into rate base. This proposal is improper and should be rejected.

Regulatory assets are used to defer the recognition of an expense that would otherwise have been included on the income statement during a certain timeframe and appears in the deferred debit portion of a balance sheet.³³ The main reason a regulatory asset is utilized by companies is to prevent a sudden steep increase in costs for certain expenses.³⁴ In other words, the Company has decided to place 80% of the assets immediately into rate base but is seeking to defer the last 20%, which will do little to prevent the steep increase necessitated by this acquisition. Because utility plant, such as this, is generally depreciated over 30 to 40 years, the concern over the large, one-time

³³ I&E Statement No. 2, p. 3.

³⁴ I&E Statement No. 2, p. 4.

impact on the income statement would not be present in this scenario. Therefore, the regulatory asset would not serve its intended purpose.

As noted by both I&E Witness Maurer and OCA Witness Everette, the regulatory asset proposal put forth by Aqua is neither consistent with longstanding ratemaking principles, nor consistent with the typical use of a regulatory asset as a ratemaking tool.³⁵ In general, regulatory assets are typically used for expense items and not for deferring rate base recognition. The proposal Aqua has made in this proceeding will cause a mismatch between the expected life of the asset and the time period over which the asset is recovered. OCA Witness Everette notes that:

The proposal to amortize the asset in increments as Aqua decides to file base rate cases means that it is not possible to know when the asset will be fully amortized and included in rate base. This is not consistent with the propose procedure for amortizing a regulatory asset, and potentially creates unnecessary risk for customers.³⁶

While delaying the recognition of the full amount in rate base does provide a temporary benefit to customers, it must also be recognized that depending on when the Company files its next base rate case, the Company may end up recovering more from ratepayers than it would have if the full amount was included in rate base. This temporary benefit is simply not sufficient to allow the Company to deviate from traditional, sound ratemaking principles.

³⁵ I&E St. No. 2, p. 5. OCA St. No.1, p. 6.

³⁶ OCA St. No. 1, p. 6.

Furthermore, this proposal is prohibited by 66 Pa.C.S.A. §1329(c)(1), which states that “the ratemaking rate base of the selling utility *shall be incorporated into the rate base...*” Accordingly, this component of Aqua’s proposal runs contrary to the law and achieves little, if any, benefit for consumers. Shall is a mandatory term. Not only does Section 1329 mandate that the ratemaking rate base be included in rate base, it also mandates the time frame in which this must occur. Section 1329 requires that, if the acquisition is approved, the rate base of the acquired utility must be incorporated either at the next base rate case or in the Company’s initial tariff filing.³⁷ Therefore, the Company’s proposal does not satisfy the requirements of Section 1329.

Given the risk created for customers and the fact that the Company’s proposed regulatory asset treatment violates Section 1329, the Company has failed to demonstrate why it would be appropriate in this instance to deviate from traditional ratemaking principles. As noted by I&E Witness Maurer, while Section 1329 is a newly enacted statute, recovery of assets such as these is not new at all.³⁸ These types of assets have traditionally been recovered through rate base and not through the type of regulatory asset procedure the Company is proposing in this proceeding. I&E sees no reason to deviate from traditional ratemaking principles. Therefore, I&E maintains, that if the Commission ultimately approves this transaction, the resulting rate base amount determined under Section 1329 must be incorporated into Aqua’s rate base during the filing of Aqua’s next base rate case and that no portion be set aside as a regulatory asset.

³⁷ 66 Pa. C.S. §1329(c)(1).

³⁸ I&E St. No. 2, pp. 6-7.

C. In the Alternative, if this Acquisition is Approved, a Cost of Service Study Should be Ordered

In this proceeding, the analysis conducted by Aqua points to the existence of a subsidization of Limerick customers by Aqua's current customers. Because this subsidization could be significant, it is important that the Commission know the extent of this subsidization, if this acquisition is approved. Accordingly, I&E recommends that the Commission require Aqua to provide a separate COSS for the Limerick system in its next base rate filing. The primary goal of a COSS is to determine a utility's revenue requirement to serve its different customer classes. A COSS determines the cost to operate the different systems, calculates the cost of the utility's services, separates the costs between the different customer classes, attributes the costs to the different classes, determines how the costs will be recovered from the different customer classes, and establishes the existence and extent of any inter or intra-class subsidizations. Therefore, I&E continues to recommend that Aqua be required to provide a separate COSS in its next base rate case should this acquisition be approved.

D. The Failure of Aqua to Seek Requisite § 507 Approvals in this Proceeding is a Fatal Flaw

Section 507 relates to contracts between public utilities and municipalities. It requires that any such contract or agreement between a certificated utility and a municipality, except for those contracts to furnish service at regularly filed tariff rates, be filed with the Commission at least 30 days before the effective date of the contract. Upon notice to both the municipality and utility, the Commission may, prior to the effective date of the contract, institute proceedings to determine the reasonableness, legality, or

any other matter affective the validity of the contract or agreement. The Commission approves these filings by issuing a certificate of filing. Section 507 notes that "...such contract or agreement shall not be effective until the commission grants its approval thereof."³⁹

One such document that would require approval under Section 507 of the Public Utility Code is the Asset Purchase Agreement ("APA"). This agreement requires approval under Section 507 because it is an agreement between Aqua and Limerick. However, Aqua's Application did not request the required approval under Section 507 for the Commission to approve the APA. I&E further notes that Aqua also failed to seek Section 507 approval of any municipal agreements in this proceeding. Exhibit F to the Company's Application which is labeled Copies of Contracts that Aqua is Accepting by Assignment appears to contain the agreements other than the APA that likely would require approvals under Section 507.

The Commission's Order in the recent *Pennsylvania American Water ("PAWC")/Scranton Sewer Authority* acquisition case acknowledged the need for approval of contracts or agreements between municipalities and public utilities.⁴⁰ That Order dedicated over five pages to the discussion of these Section 507 approvals and ultimately, the Commission granted approval of the APA and seven other agreements between PAWC and Scranton. Without the requisite approvals, Aqua cannot assume the

³⁹ 66 Pa. C.S. §507.

⁴⁰ *Joint Application of Pennsylvania-American Water Company and the Sewer Authority of the City of Scranton*, Docket No. A-2016-2537209, Opinion and Order at 87-92 (Order entered Oct. 19, 2016).

municipal contracts required for it to operate the Limerick system. Aqua's failure to request these approvals is a fatal flaw. Without these approvals, closing cannot occur and the acquisition ultimately cannot be approved. Therefore, based on Aqua's failure to seek the requisite approvals, I&E request that the application be denied.

V. CONCLUSION

The proposed transaction as filed will not affirmatively promote the public interest in a substantial way. Therefore, I&E recommends that the Application be denied. In the alternative, if the Commission approves Aqua's Application, I&E respectfully requests that the Commission: (1) require Aqua to provide a separate cost of service study for the Limerick system as part of its next base rate filing; and (2) deny Aqua's request for regulatory asset treatment, and instead, require that the resulting rate base amount determined in this proceeding be incorporated in Aqua's rate base in its next base rate filing.

Respectfully submitted,



Carrie B. Wright

Prosecutor

PA Attorney ID No. 208185

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Dated: August 10, 2017

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

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

CERTIFICATE OF SERVICE

I hereby certify that I am serving the foregoing **Main Brief** dated August 11 2017, in the manner and upon the persons listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party):

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