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September 7, 2018

VIA eFiling

Rosemary Chiavetta, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Agreement for Providing Wastewater Consumption Readings between the
Municipal Authority of Westmoreland County and Pennsylvania-American
Water Company – Wastewater Division dated July 31, 2018
Docket No. U-2018-3003922

Dear Secretary Chiavetta:

Enclosed please find Pennsylvania-American Water Company's Responses to the Bureau of
Technical Utility Services Water/Wastewater Division Data Request Set 1, dated August 23,
2018, in the above-referenced matter.

A copy of Pennsylvania-American Water Company's Responses will be served on the parties
identified on the attached Certificate of Service.

Should you have any questions concerning this filing, please contact me.

Sincerely,

Susan Simms Marsh

Enclosures

cc: P. Zander VIA E-mail
Per Certificate of Service

Agreement for Providing Wastewater Consumption Readings
between the Municipal Authority of Westmoreland County and
Pennsylvania-American Water Company – Wastewater Division
dated July 31, 2018

Pennsylvania-American Water Company's Response to
the Bureau of Technical Utility Services
Data Request Set I
Dated August 23, 2018
Docket No. U-2018-3003922

U-1

Section 4 of Pennsylvania-American Water Company – Wastewater Division's (PAWC-WD's) response dated August 9, 2018 at Docket No. C-2018-3003515 affirmed a PAWC-WD customer bill dated June 13, 2018 is based on water meter readings provided by the Municipal Authority of Westmoreland County (MAWC). However, Page 1 of this filing's Agreement for Providing Wastewater Consumption Readings between the MAWC and PAWC-WD (Agreement) indicates the Agreement was entered on July 31, 2018. Please identify the date MAWC began providing water usage data to PAWC-WD and the terms for which MAWC was previously providing monthly water usage data updates to PAWC-WD.

Response:

MAWC started providing PAWC-WD usage data on or about the acquisition date, December 18, 2017. To ensure continuity of customer billing services, MAWC continued to provide usage data, as it had with The Municipal Authority of the City of McKeesport (MACM) providing a seamless customer billing transition. There was no historic written usage data agreement between MACM and MAWC. PAWC entered into discussions with MAWC and negotiated at arm's length to secure a usage data agreement.

Responsible Witness: Michael Salvo
Senior Manager, Business Development

Agreement for Providing Wastewater Consumption Readings
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U-2

Pennsylvania-American Water Company's municipal water usage data sharing agreements on file with the Commission, such as the agreement at Docket No. U-2017-2610150, utilize a unit rate of \$0.0589 per account. However, the Agreement's Part III, Section 3 indicates PAWC-WD will pay MAWC a unit rate of \$0.135 per account. Please explain why the proposed unit rate is reasonable and compare this agreement with the data sharing arrangement between the system's prior owner and MAWC (i.e., identify the amount the system's prior owner paid for water usage data).

Response:

The unit rate of \$0.135 per account was the rate MAWC charged The Municipal Authority of the City of McKeesport (MACM) per account data usage under MACM ownership.

Responsible Witness: Michael Salvo
Senior Manager, Business Development

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Agreement for Providing Wastewater :
Consumption Readings between the Municipal :
Authority of Westmoreland County and : Docket No. U-2018-3003922
Pennsylvania-American Water Company – :
Wastewater Division dated July 31, 2018 :

VERIFICATION

I, Michael Salvo, Senior Manager – Business Development, Pennsylvania-American Water Company, hereby state that the facts set forth in the foregoing responses to the Bureau of Technical Utility Services Water/Wastewater Division Data Request Set 1 dated August 23, 2018, 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 if 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).

Dated: 9/2/18



Michael Salvo
Senior Manager – Business Development

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Agreement for Providing Wastewater :
Consumption Readings between the Municipal :
Authority of Westmoreland County and : Docket No. U-2018-3003922
Pennsylvania-American Water Company – :
Wastewater Division dated July 31, 2018 :

Certificate of Service

I hereby certify that I have this day served a true copy of Pennsylvania-American Water Company's Responses to the Interrogatories of the Bureau of Technical Utility Services Water/Wastewater Division Data Request Set 1, dated August 23, 2018, upon the parties, listed below, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA Electronic Delivery

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Senior Assistant Consumer Advocate
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Agreement for Providing Wastewater Consumption Readings between the Municipal Authority of Westmoreland County and Pennsylvania-American Water Company – Wastewater Division dated July 31, 2018

Certificate of Service – PAWC’s Responses to the Interrogatories of the Bureau of Technical Utility Services Water/Wastewater Division

Page 2

The Certificate of Service for Pennsylvania-American Water Company’s Responses to the Interrogatories of the Bureau of Technical Utility Services Water/Wastewater Division Data Request Set 1, dated August 23, 2018 has been electronically filed on the Pennsylvania Public Utility Commission’s eFiling system.

Dated: September 7, 2018



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