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**VIA ELECTRONIC FILING AND FIRST CLASS MAIL**

September 13, 2018

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**RE: Affiliated Interest Agreement between SUEZ Water Pennsylvania Inc. –  
Wastewater and Multiple Affiliated Corporations (Money Pool Agreement) at  
Docket No. G-2018-3002450**

Dear Secretary Chiavetta:

Enclosed for filing please find responses to Data Requests G-15 and G-16 from the Bureau of  
Technical Utility services Water/Wastewater Division in the above captioned case.

Best regards,

A handwritten signature in black ink, appearing to read "James C. Cagle", written over a horizontal line.

James C. Cagle  
Vice President – Rate and Regulatory Affairs

JC:dmv  
Enc.

cc: Tanya McCloskey, Office of Consumer Advocate (w/ enclosure)  
John Evans, Office of Small Business Advocate (w/ enclosure)  
Richard Kanaskie, PUC Bureau of Investigation and Enforcement (w/ enclosure)  
Manasi Deshpande, Bureau of Technical Utility Services (w/enclosure) *VIA EMAIL*  
David P. Zambito, Esq. – Cozen O'Connor (w/ enclosure)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of SUEZ Water Pennsylvania Inc.'s responses to Bureau of Technical Utility Services data requests at **Docket No. G-2018-3002450**, upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).


Tanya J. McCloskey, Esq.  
Office of Consumer Advocate  
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John Evans  
Office of Small Business Advocate  
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Richard A. Kanaskie  
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*Via email:*  
Manasi Deshpande  
Bureau of Technical Utility Services  
Water/Wastewater Division  
**mdeshpande@pa.gov**

SUEZ Water-Pennsylvania Inc.



James Cagle  
VP Rates and-Regulatory Affairs

Dated: September 13, 2018

Affiliated Interest Agreement between SUEZ Water Pennsylvania Inc. -- Wastewater  
and Multiple Affiliated Corporations (Money Pool Agreement)  
at Docket No. G-2018-3002450  
Bureau of Technical Utility Services Water/Wastewater Division  
Data Request Set 1

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BTS-G-15  
(Cagle)

BTS-G-15 The response to Data Request G-6 indicated SUEZ Water Pennsylvania Inc. Wastewater Division (SWPA-WD) will receive money pool administrative services through the Affiliated Interest Agreement (AIA) filed at Docket No. G-2016-2546481 (2016 AIA). The 2016 AIA's Section II, Paragraph 11, indicated SWPAWD will pay SUEZ Water Management and Services (SWM&S) the lower of cost or market for providing services. However, this AIA's Section II, Paragraph 12, indicates SWM&S will administer the money pool on an at cost basis. Please identify each service in the AIA that is duplicative of a service under the 2016 AIA and identify each service which would have a change in how its cost basis is determined upon AIA approval.

Response: SWM&S will administer the money pool and the costs of doing so are included in the AIA as approved under Docket G-2016-2546481. No additional or separate fees will be assessed by SWM&S or any other affiliate for administering the money pool outside of the allocation methodology of the AIA filed in Docket G-2016-2546481. The phrase referred to above in Article II, Section 2.01 a) is not intended to imply differently.

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BTS-G-16  
(Cagle)

BTS-G-16 SWPA-WD's response to Data Request G-13 states SWM&S will manage the nonregulated money pool for SWM&S and SUEZ Water Environmental Services Inc. However, Page Nos. 7, 24 and 33 of the Focused Management Audit Report prepared by the Commission's Bureau of Audits indicated the SWM&S treasury department also manages the consolidated debt pool for SUEZ Water Resources Inc.'s subsidiaries. Please state if SWPA-WD and its affiliates intend to continue receiving debt pool management services from SWM&S. If yes, please provide the estimated date by which SWPA-WD will file the affiliated debt pool agreement with the Commission.

Response: Yes. The affiliated money pool agreement referenced in the question is the money pool in this docket G-2018-3002450 filed June 1, 2018. The parties to this Money Pool agreement are the SUEZ Water Resources Inc. subsidiaries.

SWM&S will administer only (as administrative agent) but will not participate in the money pool.