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**VIA ELECTRONIC FILING AND FIRST CLASS MAIL**

September 17, 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 revised 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 be "James C. Cagle", written over a large, light-colored scribble.

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).

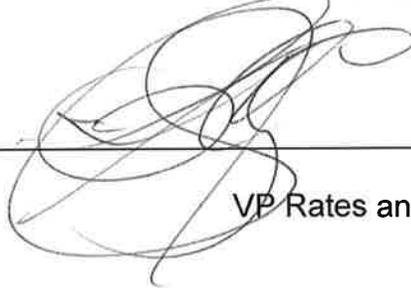
Tanya J. McCloskey, Esq.  
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*Via email:*  
Manasi Deshpande  
Bureau of Technical Utility Services  
Water/Wastewater Division  
**mdeshpande@pa.gov**

SUEZ Water Pennsylvania Inc.



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James Cagle  
VP Rates and-Regulatory Affairs

Dated: September 17, 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 (Revised)  
(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-2016-2546846 (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 (Revised)  
(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: The functions of an affiliated debt pool agreement referenced in the question are encompassed by the money pool in this docket G-2018-3002450 filed June 1, 2018. There would be no separate agreement as the Company believes the Money Pool Agreement encompasses both. 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.