PENNSYLVANIA AMERICAN WATER

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February 21, 2019

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

Re: Pennsylvania Public Utility Commission v.
Pennsylvania-American Water Company – Water Division
Docket No. R-2018-3002502; C-2018-3003600

Re: Pennsylvania Public Utility Commission v.
Pennsylvania-American Water Company – Wastewater Division
Docket No. R-2018-3002501; C-2018-3003601

Dear Secretary Chiavetta:

Enclosed for filing is the Petition of Pennsylvania-American Water Company for Reconsideration of the Order Entered February 7, 2019 in the Above-Referenced Proceeding. This filing includes the Verification.

A copy of the Petition has been served upon the parties listed on the enclosed Certificate of Service.

Please contact me if you have any questions.

Very truly yours,

Susan Simms Marsh

Enclosures

cc: Per the Certificate of Service (w/encls.)
Chairman Gladys M. Brown (w/encls.)
Vice Chairman David W. Sweet (w/encls.)
Commissioner Norman J. Kennard (w/encls.)
Commissioner Andrew G. Place (w/encls.)
Commissioner John G. Coleman, Jr. (w/encls.)
Kathryn Sophy, Office of Special Assistants (w/encls.)

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION		
v.	**DOCKET NOS.**	**R-2018-3002502** **C-2018-3003600**
PENNSYLVANIA-AMERICAN WATER COMPANY – WATER DIVISION		
PENNSYLVANIA PUBLIC UTILITY COMMISSION		
v.	**DOCKET NO.**	**R-2018-3002504** **C-2018-3003601**
PENNSYLVANIA-AMERICAN WATER COMPANY – WASTEWATER DIVISION		

PETITION OF
PENNSYLVANIA-AMERICAN WATER COMPANY
FOR RECONSIDERATION OF THE ORDER ENTERED
FEBRUARY 7, 2019 IN THE ABOVE-REFERENCED PROCEEDING

I. INTRODUCTION

Pursuant to 52 Pa.C.S. § 5.572, Pennsylvania-American Water Company ("PAWC" or the "Company") petitions the Pennsylvania Public Utility Commission (the "Commission") to reconsider its Order entered February 7, 2019 in the above-captioned proceeding ("Order"). The Order affirmed in part and reversed in part the Recommended Decision of Administrative Law Judge Marta Guhl ("ALJ") issued on December 5, 2018. In so doing, the Commission held that PAWC should not place into effect the rates, rules and regulations set forth in Supplement No. 6 to Tariff Water-PA P.U.C. No. 5 and Supplement No. 6 to Tariff Wastewater-PA P.U.C. No. 16, filed by the Company on June 4, 2018 ("Tariff Filings"). If approved, the Tariff Filings would have authorized PAWC to adopt the "no gross-up method" with respect to customer advances for

construction ("CAC") and customer contributions-in-aid-of-construction ("CIAC") (except for those received from government entities).[1] The Order also provides that the requirement to "gross-up" CAC/CIAC[2] should be imposed retroactively to January 1, 2018, thereby rejecting the ALJ's recommendation that a decision to require a "gross-up" should only apply prospectively from and after the date of a final order in this case.[3]

As explained hereafter, this Petition satisfies the applicable criteria for reconsideration of a Commission order and should be granted. Additionally, the Commission is requested to act on this Petition at its Public Meeting scheduled for February 28, 2019, because a petition seeking review of the Order by the Commonwealth Court of Pennsylvania would have to be filed within thirty days of the entry of the Order,[4] and the filing of a Petition for Review would preclude the Commission from proceeding further in this matter (subject to limited exceptions set forth in the Pennsylvania Rules of Appellate Procedure).[5]

II. PETITION FOR RECONSIDERATION AND REQUESTED RELIEF

1. The colloquy that accompanied the 3-2 split decision to reject the Company's Tariff Filings at the February 7, 2019 Public Meeting signaled Vice Chairmen David W. Sweet's determination that further consideration should be given to the important issues presented by this

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[1] As explained in the Order (pp. 8-10), the Tax Cuts and Jobs Act ("TCJA") changed the Internal Revenue Code to provide that, after the TCJA's effective date, CAC and CIAC would be taxable income to investor-owned water and wastewater utilities.

[2] "Gross-up" refers to adding an amount to a CAC or CIAC such that, after a water or wastewater utility pays: (1) the Federal and state income tax on the CAC or CIAC; and (2) the Federal and state income tax on the recursive tax-adders (each one of which is also taxable income), the remaining, after-tax amount equals the required, net CAC or CIAC. Accordingly, a "gross-up" creates (and includes) a "tax-on-tax" effect. *See* PAWC Main Brief, p. 4 n.3, explaining how the "tax-on-tax" effect must be calculated.

[3] Rec. Dec., p. 31. Significantly, the ALJ's recommendation was supported by the Bureau of Investigation and Enforcement ("I&E") and not opposed by the Office of Consumer Advocate ("OCA").

[4] Pa.R.A.P. 1512(a)(1).

[5] Pa.R.A.P. 1701(a)-(b).

case – particularly in light of the well-reasoned legal analysis in Commissioner Norman J. Kennard's dissent, which Commissioner John F. Coleman, Jr. joined.

2. Vice Chairman Sweet stated that his vote reflected, in large part, the lack of sufficient time to thoroughly analyze the issues presented by the Tariff Filings and the fact that this case would be a bellwether for other major water utilities in the Commonwealth. The Vice Chairman expressed his willingness to work with Commissioner Kennard to more deeply analyze the impacts on the water and wastewater industries, existing and prospective customers and developers in the Commonwealth of a Commission decision to substantially increase the cost of extending PUC-jurisdictional utilities' water and wastewater facilities to serve new homes and businesses and new or expanding customer demands.[6]

3. The need to decide this case at the February 7, 2019 Public Meeting was a function of the terms of Section 1308(b) of the Public Utility Code,[7] which establishes an initial suspension period of only six months from the end of the 60-day notice period following the filing of a non-general rate case.[8] Although Section 1308(b) empowers the Commission to extend the initial suspension period for an additional three months, the PUC did not do so in this case nor did it explain why it declined to exercise that option notwithstanding the Vice

[6] The taxability of CAC and CIAC is not an issue for municipally-owned water and wastewater systems because they do not pay Federal or state income taxes, as Commissioner Kennard correctly pointed out in his dissent, noting that this asymmetry in taxation produces a decidedly un-level playing field between municipal and investor-owned water and wastewater systems. Statement of Commissioner Norman J. Kennard, p. 3.

[7] 66 Pa.C.S. § 1308(b).

[8] In this case, the suspension period ended February 8, 2019, reflecting a voluntary extension from February 4, 2019 to allow the Commission to consider the Tariff Filings at its Public Meeting of February 7, 2019 instead of January 17, 2019.

Chairman's desire for additional time to consider issues implicated by this case for both PAWC and the water and wastewater industries generally.

4. Because the Commission has entered a final order tolling the initial suspension period, there is no longer a risk that a delay in the Commission taking action could allow the Tariff Filings to become effective as of the end of the initial suspension period.[9]

5. The Commission now has the opportunity to grant reconsideration in order to expand the time for addressing the issues presented in this case and, thereby, develop the further analysis that Vice Chairman Sweet was seeking – and Commissioner Kennard supported when it was clear there was not a majority to approve the Tariff Filings at the February 7, 2019 Public Meeting. In granting reconsideration, the Commission could also solicit comments from the other major water utilities, which have expressed their desire to adopt the "no gross-up" method.[10]

6. In light of the solid evidentiary record that has already been developed in this case, granting reconsideration to address in greater depth the important issues presented by PAWC's Tariff Filings is far more prudent and administratively efficient than letting the Order stand in its current form only to revisit those issues in an entirely new proceeding initiated in the near future.

7. Granting reconsideration would also avoid a fundamental unfairness to contributors of CAC and CIAC that would be forced to pay a gross-up because of the entry of the

[9] *See* 66 Pa.C.S. § 1308(b).

[10] PAWC Exceptions, p. 5 n.7.

Order and before the entry of a Commission decision in a subsequent, separate proceeding that may validate the position advocated by PAWC (and other major water and wastewater utilities) and supported by Commissioners Kennard and Coleman. That unfairness would be particularly acute given the majority's rejection of the ALJ's recommendation that a decision imposing a gross-up requirement should be effective prospectively only.[11]

8. Applying the Order as written would create a subset of contributors who have the misfortune of paying a CAC or CIAC during the interval between January 1, 2018 (the retroactive effective date of the Order) and the entry of a future order in which the Commission, upon further consideration of the adverse effects of the Order, may lift the gross-up requirement for the water and wastewater industries. And, there is no question the Order will have industry-wide impact because the terms of base rate case settlements for other water and wastewater utilities are directly tied to the outcome of this case, as the Vice Chairman explained in his remarks at the February 7, 2019 Public Meeting. It might be possible to avoid that unfairness, but that could only occur if the Commission, in a subsequent change of position, once again made its decision retroactive to January 1, 2018. However, in the meantime, contributors will have already been required to pay the gross-up, utilities will have recorded and accounted for those payments, and the tax effects could potentially have already been reflected on utilities' filed tax returns. Additionally, utilities would have to deal with the practical and administrative issues of returning the gross-up payments, including locating former contributors – or the even more daunting task of locating successors or assigns of former contributors. Neither contributors nor water/wastewater companies should have to face those needless complications when there is

[11] *Compare* Rec. Dec. at p. 31 and Order, pp. 38-40.

a simpler solution at hand, namely, the Commission's granting reconsideration and taking the time now to achieve an informed decision on issues of industry-wide significance.

9. Additionally, the Order does not address at all one of the most important reasons for validating the Company's position,[12] which Commissioner Kennard properly emphasized in his dissent, as follows:

> There are other concerns that are specific to the water industry that are not acknowledged in the RD. Investor-owned water utilities are in competition with municipalities and authorities for the acquisition of new water and wastewater service customers. Unlike water utilities, municipalities and authorities do not pay federal income taxes (which renders the "gross up" issue for these local government entities moot). Given the choice, it should be obvious then that the developer would prefer local government water service. This creates an unfair playing field and is contrary to the water utility growth strategy that we and the General Assembly have applied for many years.[13]

10. The ability of investor-owned companies to compete on a level playing field with municipal water and wastewater service providers has a direct and substantial impact on the costs borne by the customers of PUC-jurisdictional utilities. When the number of customers is increased, a utility's fixed costs are spread over a larger base, the unit cost of providing service is reduced and the utility's rates are lower than they otherwise would be. When new customers or new load is lost to non-jurisdictional water and wastewater providers, the customers of PUC-jurisdictional utilities lose a significant benefit. Moreover, under PAWC's tariff rules for CAC/CIAC, *existing* customers are still significantly better off if new customers are added even

[12] *See* PAWC Exceptions, pp. 5-6 and n.10.

[13] Statement of Commissioner Norman J. Kennard, p. 3.

if the CAC/CIAC is *not* grossed-up, as PAWC's Director of Rates explained in unrefuted testimony:

> As shown on PAWC Exhibit No. 5, a new average residential water customer provides net revenue sufficient to fund $4,839 in rate base. Under the applicable provisions of the Company's water tariff, the Company's investment in the facility extension that might be needed to add that customer would be $2,632. The net benefit to the Company and its existing customers is $2,797, which includes the effect of the depreciation deductions on the new plant funded by CAC/CIAC. Based on that amount, the Company and its existing customer could receive up to $9,681 in contributed property and absorb the income taxes on that amount and still break-even. Any contribution less than that amount is a net benefit to the Company and its existing customers, because existing fixed costs that otherwise would be borne by existing customer are spread over a larger customer base, and the new customers are paying a level of fixed costs that exceeds the amount of rate base installed to serve them.[14]

As PAWC witness Cox also explained, for wastewater customers, the benefit is even larger because the Company does not fund any portion of the facility extension for non-bona-fide applicants.[15]

11. The Commission still purports to view "competition" as potentially relevant to its decision made thirty years ago to allow gas and electric companies to use the no gross-up method,[16] notwithstanding the comprehensive restructuring of those industries that occurred since then.[17] Nonetheless, the Commission appears to give no weight – and certainly not the weight that it deserves – to unrebutted record evidence that imposing the gross-up method on PUC-jurisdictional water and wastewater utilities would place them at a severe competitive

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[14] PAWC St. No. 1, p. 8. See also PAWC Main (pp. 8-9) and Reply (pp. 2-3) Briefs.

[15] *Id.*

[16] *See* Order, p. 31.

[17] PAWC Exceptions, p. 5. *See* PAWC Main Brief, pp. 7-8.

disadvantage relative to non-taxable municipal service providers and, thereby, harm *existing* water and wastewater customers. The evidence PAWC presented on the issue of competition between municipal and PUC-jurisdictional water and wastewater service providers is far more substantial – and more directly relevant to the issue at hand – than the 30-year old findings (made prior to gas and electric restructuring) that the Commission relied upon in the Order to reject the Tariff Filings. Commissioner Kennard's dissent properly underscored the Order's disregard for that important issue.[18]

12. Finally, the Order does not discuss the negative impact that the gross-up method is likely to have on economic development in the Commonwealth and, in particular, on the building industry and employment in the building trades. This issue was addressed at length by the Pennsylvania Builders Association ("PBA"), a professional trade organization that represents the interests of its more than 5,000 members throughout Pennsylvania that are engaged in the building industry as builders, developers, remodelers, material suppliers, subcontractors and consultants.[19] The PBA brings to this proceeding the voice of an important constituency that is directly affected by the imposition of a gross-up requirement. As explained by Daniel E Darden – the Chief Executive Office of PBA and a professional with many years of hands-on experience[20] – a mandated gross-up requirement for the PUC-regulated water and wastewater industries would create a "new financial burden" and "serve as a deterrent for developers" to undertake new building projects in Pennsylvania.[21] Mr. Darden stated further:

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[18] *See* Statement of Commissioner Norman J. Kennard, p. 3.

[19] PBA St. No. 1, p. 2.

[20] *Id.*

[21] *Id.* at 5. *See also* PAWC Main Brief, explaining that while CAC and CIAC were made taxable by the Tax Reform Act of 1986, the negative impact of that enactment on the water and wastewater industries led the Federal

> As such, approval of the no gross-up method in this case could have a serious impact on economic development in PAWC's service territory and negatively affect the public generally . . . Overall, I submit there is ample evidence to support the conclusion that encouraging new home construction to take advantage of public water/wastewater supplied by PAWC creates significant public benefits.[22]

13. The negative effect of mandating gross-up of CAC/CIAC for water and wastewater utilities would not be restricted to residential development. New commercial and industrial development, as well as new load to be derived from expanding existing small and large businesses, would be curtailed. Businesses weighing whether (or when) to make new investments to expand their operations would be forced to reassess whether their plans would still be economically viable if they need to bear the longer pay-back periods and higher financing costs that grossed-up CAC/CIAC would necessarily require.

14. The gross-up requirement's principal effect would be to reduce the overall level of economic activity in the Commonwealth either by killing otherwise viable projects before they can get off the ground or by causing developers to seek better environments for their investments in other states (such as New York[23]) that do not impose a pervasion gross-up requirement on CAC and CIAC for regulated, tax-paying water and wastewater utilities.[24] As PBA witness Darden also explained, even if it were possible for developers of residential

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government, in the 1996 Small Business Jobs Protection Act, to revise the Internal Revenue Code to provide that CAC and CIAC would not be taxable income to water and wastewater companies.

[22] PBA St. 1-R, p. 4.

[23] *See* PAWC Main Brief, p. 8 and n.15; PAWC Reply Brief, pp.7-8. The New York Public Service Commission ("NYPSC") recognized that its decision thirty years ago to require a gross-up of water utility CAC/CIAC did not stand the test of time. Therefore, the NYPSC reversed course when considering the impact of the TCJA and held that, absent exceptions not relevant to this case, water utilities in New York should not impose a gross-up on CAC or CIAC. *Proceedings on the Motion of the Commission on Changes in Law that May Affect Rates*, Case No. 17-M-0815 (NYPSC Order issued Aug. 9, 2018), pp. 32-33.

[24] PBA St. 1, p. 5; PBA St. 1-R, p. 4.

property to reflect the added costs of grossing up CAC and CIAC in new home prices (which is questionable), doing so would have a profound adverse effect on the affordability of housing in the Commonwealth by pricing many potential home buyers out of the market.[25]

15. The Commission also did not consider the impact of its gross-up mandate on bona fide applicants for service. Many bona fide applicants request main extensions for their existing residential dwellings because the wells they rely upon no longer provide water that is adequate in quality or quantity for domestic use.[26] Although the Company makes a substantial investment in main extensions for bona fide applicants pursuant to the Commission's main extension regulations,[27] CAC/CIAC is still required for projects that exceed the Company's share of main extension costs.[28] Additionally, under the Commission's regulations, even bona fide applicants for service bear the entire cost of facilities installed to furnish "special utility service."[29] Imposing a gross-up requirement means there will be some bona fide applicants for service that will pay materially more to fund the CAC/CIAC required from them under the terms of the Commission's regulations. The potential adverse effect of a gross-up requirement on bona fide applicants for service was not discussed in the Order.

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[25] *See* PBA St. 1-R, pp. 4-5 explaining that a National Association of Home Builders' study indicates that 9,374 households would be priced out of the market for medium-priced new homes in Pennsylvania if the price of a new home increases by $1,000.

[26] *See Popowsky v. Pa. P.U.C.*, 589 Pa. 605, 910 A.2d 38 (2006).

[27] *See* 52 Pa. Code §§ 65.21-65.22.

[28] *See Popowsky v. Pa. P.U.C., supra* (Upholding the validity of the Commission's main extension regulations and affirming the Commission's order requiring CACs from bona fide applicants to fund the costs of requested main extensions that exceeded the utility's share of such costs under the formula for economic justification set forth in the regulations.).

[29] *See* 52 Pa. Code § 65.23.

III. PAWC'S REQUEST FOR RECONSIDERATION SATISFIES THE APPLICABLE LEGAL STANDARD

16. In *Duick v. Pennsylvania Gas and Water Co.*,[30] the Commission provided the following guidance on the criteria it would consider in deciding requests for reconsideration:

> A petition for reconsideration, under the provisions of 66 Pa.C.S. § 703(g), may properly raise any matters designed to convince the Commission that it should exercise its discretion under this code section to rescind or amend a prior order in whole or in part. In this regard we agree with the Court in the *Pennsylvania Railroad Company* case, wherein it was said that "[p]arties . . ., cannot be permitted by a second motion to review and reconsider, to raise the same questions which were specifically considered and decided against them. . . ." What we expect to see raised in such petitions are new and novel arguments, not previously heard, or considerations which appear to have been overlooked or not addressed by the Commission. Absent such matters being presented, we consider it unlikely that a party will succeed in persuading us that our initial decision on a matter or issue was either unwise or in error.

17. The facts and circumstances that are relevant to this Petition, which were summarized in Section II, *supra*, are unique in several respects and present "new and novel" grounds for reconsideration and identify issues and concerns that the Commission did not address. Indeed, the Commission did not have a reasonable opportunity to address most of those new issues and concerns, as was demonstrated by the extemporaneous dialogue between the Vice Chairman and Commissioner Kennard at the February 7, 2019 Public Meeting.

18. As previously explained, the Vice Chairman candidly and forthrightly explained his position that the issues presented by the Tariff Filings are important and deserve more time, deeper analysis and further consideration than the temporal constraints a non-general rate filing

[30] 56 Pa. P.U.C. 553 (1982).

allows. As also previously explained, the entry of the Order, which tolled the initial suspension period, coupled with a grant of reconsideration as requested herein, will provide the Commission the opportunity it needs, and the Vice Chairman seeks, to give these industry-significant matters the attention they deserve.

19. The Vice Chairman and Commissioner Kennard left the door open to revisit, significantly modify and potentially reverse the water/wastewater industry-wide effects of the Order in a separate, future proceeding. However, their discussion – coming as it did at the Public Meeting where the Order was entered – did not afford the Company the opportunity to explain the fundamental unfairness the suggested path forward could create for contributors finding themselves sandwiched between the retroactive effective date of the Order and the effective date of a future order attempting to undo the adverse effects of that Order. That explanation has been presented in this Petition, and it provides a valid, independent basis for granting reconsideration.

20. Additionally, as explained in detail in Section II, *supra*, the Order is silent regarding the significant adverse impact the imposition of the gross-up method will have on the real and well-documented competition[31] that exists between unregulated, non-taxable municipal service providers and tax-paying, PUC-jurisdictional water and wastewater companies. Placing PUC-jurisdiction water and wastewater companies at a competitive disadvantage by forcing them to charge a gross-up of CAC and CIAC while municipal systems leverage their now even greater tax-advantaged status to attract new customers away from taxable companies will harm PUC-jurisdictional utilities' *existing* customers, for all the reasons summarized in Section II, *supra*. Thus, contrary to averments offered by I&E, forcing the imposition of a gross-up will *not*

[31] *See* PAWC Exceptions p. 6 and n.10.

benefit PUC-jurisdictional utilities' existing customers – it will, instead, place unnecessary upward pressure on the rates of those customers. The Order does not discuss this relevant and undisputed evidence, let alone provide a reasoned analysis to show why, despite that evidence, it rejected the Tariff Filings. This vitally important issue should not go unaddressed. Reconsideration should be granted so that this issue may receive the attention it deserves.

21. The Order is also silent on the effect that mandating a gross-up requirement on PUC-regulated water and wastewater companies will have on economic development in their respective service territories. In this case, PBA presented substantial evidence – discussed in detail in Section II, *supra* – that the public interest overall, and not just the interests of PAWC's existing customers, would be harmed by imposing a gross-up requirement. Economic development, employment in the building trades, and both the availability and affordability of housing in the Commonwealth would be adversely affected by the Order. The Commission should not pass final judgment on the issues raised by the Tariff Filings – which necessarily affects all PUC-regulated water and wastewater companies – without giving serious consideration to those important issues. As also discussed in Section II, *supra*, the Order does not discuss the impact the gross-up requirement will have on bona fide applicants requesting main extensions that exceed the Company's share of the cost of those extensions. Granting reconsideration would allow the PUC to address those deficiencies in the Order.

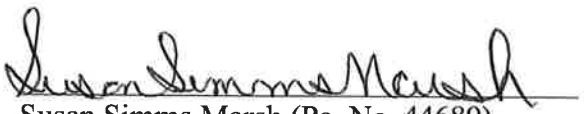
22. Although it is clear that the Order should be reversed in its entirety, the Commission should also grant reconsideration to address its decision to make the Order effective retroactively to January 1, 2018. As previously explained, the Company and I&E were in agreement that, if the Commission were to decide to impose a gross-up requirement, that

decision should be effective prospectively only. The OCA did not oppose that position, which the ALJ endorsed and recommended.

IV. CONCLUSION

WHEREFORE, for the reasons set forth above, the Commission should grant reconsideration, use the additional time afforded by reconsideration to address the concerns raised by Vice Chairman Sweet, and, for the reasons set forth herein and in the Company's Exceptions and Main and Reply Briefs, reverse the Order and withdraw its mandate that taxable, PUC-jurisdictional water and wastewater utilities must use a gross-up method for taxable CAC and CIAC.

Respectfully submitted,



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Counsel for Pennsylvania-American Water Company

Dated: February 21, 2019

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
v.	:	**Docket No. R-2018-3002502**
	:	**C-2018-3003600**
PENNSYLVANIA-AMERICAN WATER COMPANY – WATER DIVISION	:	
PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	**Docket No. R-2018-3002504**
v.	:	**C-2018-3003601**
PENNSYLVANIA-AMERICAN WATER COMPANY – WASTEWATER DIVISION	:	

VERIFICATION

I, John Cox, Director of Rates and Regulations, Pennsylvania-American Water Company, hereby state that the facts set forth in the foregoing Petition of Pennsylvania-American Water Company for Reconsideration of the Order Entered February 7, 2019, 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: 2/21/19

John Cox
Director of Rates and Regulations

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
v.	:	**Docket No. R-2018-3002502**
	:	**C-2018-3003600**
PENNSYLVANIA-AMERICAN WATER COMPANY – WATER DIVISION	:	
PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	**Docket No. R-2018-3002504**
v.	:	**C-2018-3003601**
PENNSYLVANIA-AMERICAN WATER COMPANY – WASTEWATER DIVISION	:	

Certificate of Service

I hereby certify that I have this day served a true copy of the Petition of Pennsylvania-American Water Company for Reconsideration of the Order Entered February 7, 2019 in the Above-Referenced Proceeding on the following persons, in the manner specified below, in accordance with the requirements of 52 Pa. Code § 1.54:

VIA ELECTRONIC AND FIRST CLASS MAIL

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Counsel for the Pennsylvania Builders Association

The Petition has been electronically filed on the Pennsylvania Public Utility Commission's eFiling system.

Date: February 21, 2019

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