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March 1, 2019

VIA eFILING

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

**Re: Petition of Pennsylvania American Water Company Wastewater
Operations for Approval of Modification of Long Term Infrastructure
Improvement Plan
Docket No. P-2014-2431005**

Dear Secretary Chiavetta:

Enclosed for filing in the above-referenced matter is the **Prehearing Conference Memorandum on behalf of Pennsylvania-American Water Company**. Copies have been served on Deputy Chief Administrative Law Judge Joel H. Cheskis, Administrative Law Judge Andrew M. Calvelli, and the persons indicated on the attached Certificate of Service.

Very truly yours,




Anthony C. DeCusatis

ACD/ap
Enclosures

c: Per Certificate of Service (w/encls.)

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PENNSYLVANIA-
AMERICAN WATER COMPANY
WASTEWATER OPERATIONS FOR
APPROVAL OF MODIFICATION OF
LONG-TERM INFRASTRUCTURE
IMPROVEMENT PLAN** :
:
:
: **DOCKET NO. P-2014-2431005**
:
:
:

**PREHEARING CONFERENCE MEMORANDUM OF
PENNSYLVANIA-AMERICAN WATER COMPANY**

**TO DEPUTY CHIEF ADMINISTRATIVE LAW JUDGE JOEL H. CHESKIS AND
ADMINISTRATIVE LAW JUDGE ANDREW M. CALVELLI:**

Pursuant to the February 14, 2019 Prehearing Conference Order issued by Deputy Chief Administrative Law Judge Joel H. Cheskis and Administrative Law Judge Andrew M. Calvelli (the “ALJs”) and the Pennsylvania Public Utility Commission’s (“Commission”) regulations at 52 Pa. Code § 5.222(d), Pennsylvania-American Water Company (“PAWC” or the “Company”) hereby submits its Prehearing Conference Memorandum in the above-captioned proceeding.

I. HISTORY OF THE PROCEEDING

This proceeding relates to the Long-Term Infrastructure Improvement Plan (“2014 LTIIIP”) for the Company’s wastewater operations previously approved by the Commission on December 4, 2014.¹ The 2014 LTIIIP covers a five-year period (2014 through 2019) and focuses

¹ *Petition of Pennsylvania-American Water Co. Wastewater Operations for Approval of its Long-Term Infrastructure Improvement Plan and a Distribution System Improvement Charge*, Docket Nos. P-2014-2431005 and C-2014-243370 (Opinion and Order entered Dec. 4, 2014) (“December 2014 Order”). In the December 2014 Order, the Commission also approved PAWC’s request to establish a Distribution System Improvement Charge (“DSIC”) for its wastewater operations, subject to refund and recoupments after resolution of the issues the

on infrastructure improvements designed to maintain safe and reliable service as a result of aging collection system infrastructure and infiltration and in-flow (“I&I”) resulting from rainwater and groundwater.² The 2014 LTIIP reflects PAWC’s implementation of a plan designed to accelerate annual investments by approximately \$5.14 million annually for infrastructure upgrades, including: (1) replacement of approximately 94,000 linear feet of pipeline, 1,200 laterals, 400 manholes and one lift station; and (2) expansion of treatment, pumping and sludge disposal facilities to aggressively abate I&I.³

On February 29, 2016, February 28, 2017 and February 27, 2018, PAWC filed its Annual Asset Optimization Plan (“AAOP”), and those plans were subsequently approved by the Commission. As part of its approval of the February 27, 2018 AAOP, the Commission Bureau of Technical Utility Service (“TUS”) directed PAWC to modify its 2014 LTIIP in light of the acceleration of DSIC-eligible wastewater capital investments shown in the AAOP for 2015-2017. To that end, on December 12, 2018, PAWC filed the above-captioned Petition for Commission approval to replace the Company’s 2014 LTIIP for the year 2019 and include four additional years (2020-2023) (the “Modified LTIIP”).⁴

The Modified LTIIP, like the 2014 LTIIP, is designed to accelerate the rehabilitation, improvement and replacement of aging wastewater infrastructure, particularly for troubled systems acquired by PAWC, and continues to focus on reducing I&I. The Modified LTIIP

Commission referred to the Office of Administrative Law Judge for the parties to address in on-the-record proceedings. Thereafter, the parties resolved those issues by a Joint Stipulation that provided, among other things, that the DSIC was not applicable to PAWC’s Franklin and Koppel wastewater systems. On May 7, 2015, the Commission entered an Order approving the Joint Stipulation.

² See December 2014 Order, pp. 4-16, 12-15.

³ *Id.*, p. 16.

⁴ The Company originally filed a Petition for Approval of a Major Modification to its Existing Long-Term Infrastructure Improvement Plan and Approval of its Second Long-Term Infrastructure Improvement Plan on November 8, 2018, but withdrew that petition on December 10, 2018 following guidance from TUS.

reflects the following principal changes: (1) the Company's use of a more detailed risk-based condition assessment to prioritize projects; (2) increased spending of \$20 million annually to maintain an accelerated rate of investment; (3) addition of 11 wastewater districts, including both combined and sanitary sewer systems acquired since 2014; and (4) expansion of DSIC-eligible property to include assets associated with combined sewer systems and the entire customer service lateral on gravity wastewater collection systems.⁵

The Petition was served on the Office of Consumer Advocate ("OCA"), the Office of Small Business Advocate ("OSBA"), I&E, and all parties of record in PAWC's most recent base rate proceeding at Docket No. R-2017-2595853. On January 2, 2019, I&E filed an Answer to PAWC's Petition and subsequently filed an Amended Answer and Comments on January 10, 2019. Comments on PAWC's Modified LTIIP were filed by the OCA on January 9, 2019.

In its Amended Answer, I&E requested that this matter be assigned to the Office of Administrative Law Judge for an investigation. Accordingly, this matter was assigned to the ALJs; the Commission's Secretary issued a notice that a Prehearing Conference would be held on March 8, 2019 at 10:00 a.m.; and the ALJs subsequently issued their Prehearing Conference Order calling for, *inter alia*, the submission of this Prehearing Conference Memorandum.

II. RESPONSES TO PARAGRAPH 8 OF THE PREHEARING ORDER

A. Service List (Prehearing Order, ¶ 8.a.)

Pursuant to 52 Pa. Code § 1.55, PAWC hereby designates the following individual for the service list in this proceeding:

⁵ Petition, p. 7.

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Parties are requested to also serve documents on the following attorneys as a courtesy:

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B. Possibility Of Settlement (Prehearing Order, ¶ 8.b.)

PAWC intends to engage in settlement discussions with the other parties in this proceeding with the goal of facilitating an effective resolution of this matter. *See* Paragraph II.D., *infra*.

C. Discovery (Prehearing Order, ¶ 8.c.)

PAWC proposes that a Protective Order be adopted in this case to protect from public disclosure any sensitive information⁶ that may be produced in response to discovery or presented for the record. Therefore, PAWC respectfully requests that the ALJs approve the proposed Protective Order attached hereto as Appendix “A,” which is similar to the Protective Order entered in PAWC’s most recent base rate case proceeding at Docket No. R-2017-2595853.

⁶ *See, e.g., Public Utility Confidential Security Information Disclosure Protection Act*, 35 P.S. §§ 2141.1—2141.6 and 52 Pa. Code § 102.1-102.4.

D. Proposed Schedule (¶ 8.d.)

The Company, I&E, the OCA and the OSBA have discussed the procedure going forward that would be most efficient in light of the parties' positions in this case. The parties believe that there may be a reasonable opportunity to reach a resolution of the issues and concerns raised in I&E's Amended Answer and Comments and the OCA's Comments by means of a stipulation or settlement. Accordingly, the parties request that the ALJs hold in abeyance establishing a procedural schedule at this time so that the parties can focus on meeting and discussing I&E's and OCA's issues and concerns with the goal of reaching a resolution that does not require formal litigation. The parties will provide the ALJs a status report within 30 days after the Prehearing Conference. The parties will also notify the ALJs if it becomes necessary to establish a schedule for submitting written testimony and conducting an evidentiary hearing.

E. Witnesses (Prehearing Order, ¶ 8.e.)

If it should become necessary to present written testimony, the witness or witnesses PAWC would call will depend in large part upon the issue(s) other parties intend to pursue and the nature and scope of their case-in-chief. With that caveat, if written testimony is needed, the Company would expect to present testimony by Mr. David Kaufman to describe the key components of PAWC's Modified LTIP, including the types of property being replaced or rehabilitated, how the proposed infrastructure improvements will enhance system safety and reliability, customer service and environmental compliance and the acceleration of PAWC's investment provided for in the Modified LTIP. Mr. Kaufman is employed by PAWC as Vice President – Engineering. His business address is 852 Wesley Drive, Mechanicsburg, Pennsylvania 17055 and his phone number is 717.550.1610. While PAWC could foresee calling Mr. Kaufman as the Company's witness, it would not be able to determine its final list of all

witnesses until it obtains and reviews the other parties' direct testimony. Accordingly, in the event written testimony may be required, PAWC reserves the right to amend its list of witnesses as it determines necessary or appropriate to address issues as they develop over the course of this proceeding.

F. Statement Of Issues (Prehearing Order, ¶8.f.)

The issue in this proceeding is whether PAWC's Modified LTIP contains all of the elements required by 66 Pa.C.S. §§ 1352(a)(1)-(6) and 52 Pa. Code §§ 121.1 *et seq.* (the "LTIP Regulations") and thus is reasonable, cost-effective and designed to ensure and maintain adequate, efficient, safe, reliable and reasonable service.⁷ The key components of the Company's Modified LTIP that satisfy those requirements for Commission approval are summarized below.

1. Types and Ages of Eligible Property (66 Pa.C.S. § 1352(a)(1); 52 Pa. Code § 121.3(a)(1)); The Manner in Which the Replacement of Aging Infrastructure Will Be Accelerated Under the Modified LTIP and how the Repair, Improvement or Replacement Will Ensure and Maintain Adequate, Efficient, Safe, Reliable and Reasonable Service (66 Pa.C.S. § 1352(a)(6))

The accelerated investment totaling approximately \$116.4 million encompassed by the Modified LTIP consists entirely of "eligible property," as defined in 66 Pa.C.S. §1351.⁸ As described in detail in Section 1 of the Modified LTIP, such property includes a variety of wastewater facilities, including collection mains, manholes, lift stations, service laterals, combined sewer overflow ("CSO") structures, diversion chambers and inlets/catch basins.⁹

⁷ The LTIP Regulations were established pursuant to a May 23, 2014 Final Rulemaking Order at Docket No. L-2012-2317274 and became effective on December 20, 2014.

⁸ Petition, Attachment A, p. 32.

⁹ *Id.*, pp. 5-13.

As explained in Section 6, the Modified LTIP proposes to increase the Company's historic annual wastewater DSIC-eligible spending, on average, from approximately \$7.8 million annually to over \$20 million annually, representing a 159 percent increase, to continue making necessary system upgrades at an accelerated pace.¹⁰ This accelerated investment continues the 2014 LTIP's key objectives of replacing aging infrastructure and reducing I&I in newly acquired troubled wastewater systems.

2. Schedule for Planned Repair and Replacement of Eligible Property (66 Pa.C.S. § 1352(a)(2); 52 Pa. Code § 121.3(a)(2)) and Reasonable Estimates of the Quantity of the Eligible Property to Be Improved (66 Pa.C.S. § 1352(a)(4); 52 Pa. Code § 121.3(a)(2))

Section 2 of the Modified LTIP describes in detail the Company's rigorous framework for analyzing, prioritizing and accelerating the renewal of aging wastewater collection system infrastructure. The first step of that process involves a macro-level analysis of each wastewater system using the Company's Geographic Information System and other data to identify general categories of property for replacement or rehabilitation, including sewer collection basins with high I&I and older systems with terra cotta pipes, aging lift systems or deteriorated brick manholes.¹¹

From those general categories, specific manholes, pipes, service laterals, lift stations and CSO facilities were identified as potential candidates for replacement or rehabilitation based on wastewater system investigation studies that included flow measurement, smoke testing, closed circuit television inspection, system modeling and physical inspection.¹² PAWC then applied a risk-based condition assessment methodology to prioritize DSIC-eligible capital improvement projects identified through this micro-level planning process. The risk-based condition

¹⁰ *Id.*, pp. 37-38.

¹¹ *Id.*, pp. 14-15.

¹² *Id.*, pp. 15-16.

assessment scored each project using standard likelihood of failure (“LoF”) and consequence of failure (“CoF”) factors. The LoF score estimates the structural integrity of each asset while the CoF rating is related to the environmental, economic and social consequences of asset failure. After both ratings were determined, they were multiplied together to arrive at the risk score, which was then used to prioritize property in need of more aggressive maintenance and repair.¹³

Table 8 in Section 4 of the Modified LTIP shows the number of pipes, laterals, manholes and lift stations to be replaced by PAWC each year based on the results of its risk-based condition assessment. These figures are estimates in light of the ongoing sewer system evaluation and other planning studies performed by the Company as described in Section 2 of the Modified LTIP.¹⁴

3. Location of Eligible Property (66 Pa.C.S. § 1352(a)(3); 52 Pa. Code § 121.3(a)(3))

As explained in Section 3 of the Modified LTIP, PAWC wastewater systems include: Fairview North, Fairview South, Franklin, McEwensville, New Cumberland, Blue Mountain Lake, Lehman Pike, Marcel Lake, Pocono, Scranton, Coatesville, Clarion, Claysville, Koppel, McKeesport, Dravosburg, Duquesne and Paint-Elk. Since acquiring those wastewater systems, PAWC has made improvements based on studies and investigations that have identified the need to rehabilitate or replace deteriorated and failed pipes, manholes and lift stations.¹⁵ The Company’s accelerated investment under its Modified LTIP will be targeted and prioritized based on the factors described in Section 2 of the Modified LTIP and Section II.F.2 above.

¹³ See Petition, Attachment A, pp. 17-21.

¹⁴ *Id.*, p. 36.

¹⁵ *Id.*, pp. 22-36.

4. Projected Annual Expenditures to Implement the Modified LTIP and Measures to Ensure that the Plan is Cost Effective (66 Pa.C.S. § 1352(a)(5); 52 Pa. Code § 121.3(a)(5); 52 Pa. Code § 121.4(d))

The tables set forth in Sections 5 and 6 of the Modified LTIP show PAWC's plan to increase annual investment in infrastructure improvements to over \$20 million annually, excluding projects associated with regulatory compliance.¹⁶ The overall cost-effectiveness of PAWC's Modified LTIP is established by data presented in Section 2 of the Plan which show that accelerated investments to replace aging infrastructure and manage I&I are the focus of the Company's Modified LTIP. The eligible property within each project is being prioritized for improvement and replacement using risk assessment measures designed to help plan and optimize expenditures by, for example, grouping projects by geographic proximity to achieve unit cost savings.¹⁷ In addition, as explained in Section 5, the Company uses competitive bidding to ensure all major capital improvement projects are completed in a cost-effective manner.¹⁸

5. Workforce Management Plan (66 Pa.C.S. § 1359(a); 52 Pa. Code § 121.3(a)(7))

To ensure system reliability and public safety, PAWC's contractor workforce will be fully qualified, in accordance with the standards set forth in Section 1359 of the Public Utility Code. In that regard, PAWC administers a competitive process for soliciting contracts and uses a third party to monitor contractor safety performance through a pre-qualification process. During the pre-qualification screening process, contractors are required to submit documentation, including safety history, technical capabilities, staffing information and Worker's Compensation

¹⁶ *Id.*, pp. 36-38.

¹⁷ *Id.*, p. 20.

¹⁸ Petition, Attachment A, p. 37.

Experience Ratings. Additional information about PAWC's use of a qualified work force is provided in Section 7 of the Modified LTIP.¹⁹

6. Outreach and Coordination Activities (52 Pa. Code § 121.3(a)(8))

PAWC will continue to coordinate with municipalities, the Department of Transportation and other utilities to align their respective work schedules and minimize the impact of activities on the public. As explained in Section 8 of the Modified LTIP, such coordination includes maintaining open communication with applicable municipalities, agencies and utilities, use of technology to minimize roadway disturbance, delivery of high-speed notifications to customers when water emergencies occur, and leveraging opportunities to replace sewer and water lines simultaneously.²⁰

In summary, the accelerated investment included in the Modified LTIP will enable the Company to upgrade collection system infrastructure, reduce I&I levels to minimize overflow issues, and address deficiencies in certain newly acquired wastewater systems. These infrastructure improvements will improve safety and reliability, customer service and environmental compliance. Accordingly, the Commission should approve the Modified LTIP that contains all of the elements required by Section 1352 of the Public Utility Code and the LTIP Regulations.

¹⁹See *id.*, p. 38.

²⁰ *Id.*, p. 39.

III. CONCLUSION

WHEREFORE, Pennsylvania-American Water Company submits this Prehearing Memorandum and respectfully requests that the Administrative Law Judges approve the proposed schedule, and enter the proposed Protective Order provided herewith.

Respectfully submitted,



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Dated: March 1, 2019

Counsel for
Pennsylvania-American Water Company

APPENDIX A

PROPOSED PROTECTIVE ORDER

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PENNSYLVANIA-	:	
AMERICAN WATER COMPANY	:	
WASTEWATER OPERATIONS FOR	:	
APPROVAL OF MODIFICATION OF	:	DOCKET NO. P-2014-2431005
LONG-TERM INFRASTRUCTURE	:	
IMPROVEMENT PLAN	:	
	:	

PROTECTIVE ORDER

This Protective Order is hereby GRANTED with respect to all documents and information, as identified below, produced or presented, or hereafter produced or presented in this proceeding. All persons now or hereafter granted access to such documents and/or information shall use and maintain the same only in strict accordance with this Protective Order.

This Protective Order is being entered to facilitate the orderly production of information and documents during discovery and the presentation of evidence at the hearings in this case and to provide adequate protection of Confidential Information without prejudicing the rights of parties to have reasonable access to information that becomes part of the evidentiary record.

THEREFORE, IT IS ORDERED THAT:

1. Any information provided to the Pennsylvania Public Utility Commission (Commission) or any parties in connection with the above-captioned proceeding that a producing party claims constitutes or contains Confidential Information shall be specifically identified and marked as Confidential Information. The producing party shall designate data or documents as constituting or containing Confidential Information by affixing a conspicuous “CONFIDENTIAL” stamp or typewritten designation on such data or documents. Where only

part of data compilations or multi-page documents constitutes or contains Confidential Information, the producing party, insofar as reasonably practicable within time constraints imposed in this proceeding, shall designate only the specific data or pages of documents which constitute or contain Confidential Information and shall serve such documents separately from non-confidential information.

2. Each document and the information contained therein designated as “Confidential Information” shall be used by the recipient solely for purposes relating to the prosecution, review and processing of this proceeding and for no other purpose; and such documents and information shall be maintained in secure files, separate from public information, until returned to the producing party or destroyed pursuant to the terms hereof.

3. With respect to all Confidential Information, it is further ORDERED that:

(a) Access to the documents designated as “Confidential Information,” and to the information contained therein, shall be limited to the parties and their identified attorneys, employees, and consultants whose examination of the Confidential Information is required for the conduct of this proceeding.

(b) Recipients of Confidential Information shall not disclose the contents of the documents produced pursuant to this Protective Order to any person(s) other than their identified employees and any identified witnesses/consultants whom they may retain in connection with this proceeding, irrespective of whether any such expert is retained specially and is not expected to testify, or is called to testify in this proceeding. All employees (except Bureau of Investigation & Enforcement (BI&E) witnesses who are full-time employees and shall be entitled to receive documents without individually executing a Certification), consultants or experts of any of the parties bound by this Protective Order who are to receive copies of

documents or information produced pursuant to this Protective Order shall have executed a copy of the Certification attached hereto as Appendix A, which executed Certification shall be forthwith provided to counsel for the producing party with copies to counsel for other parties. The BI&E Prosecutors who enter an appearance in this proceeding shall represent that all BI&E witnesses/employees will be bound by this Protective Order.

(c) No other disclosure of Confidential Information shall be made to any person or entity except with the express written consent of the producing party or upon further order of the Commission or of any Court of competent jurisdiction which may review these matters.

4. The acceptance by the parties of documents or information which has been identified and marked as Confidential Information shall not serve to create a presumption that the material is in fact entitled to any special status in these or any other proceedings. Accordingly, as provided in 52 Pa. Code § 5.423, a party receiving Confidential Information retains the right, either before or after receipt of such Confidential Information, to challenge the legitimacy of the claim that the information is proprietary. Any party may initiate such a challenge by notifying the Commission, with reasonable notice to all other parties, that it wishes to challenge the designation of the material as Confidential Information. In that event, the producing party, as the provider of the Confidential Information, shall have the burden of proving that the material is entitled to protected status. However, notwithstanding such challenge, all parties shall continue to treat the documents and information subject to challenge as Confidential Information in accordance with the terms of this Protective Order, pending resolution by the Commission of the dispute as to its status.

5. The producing party retains the right to seek restrictions on the production, distribution and use by other parties of the Confidential Information beyond the protection expressly afforded such Confidential Information by this Protective Order.

6. This Protective Order shall not operate as a determination, for any purpose, that any documents or information produced pursuant to this Protective Order are either admissible or inadmissible in these or any other proceedings.

7. Documents or other materials containing Confidential Information filed with the Commission in this proceeding, including but not limited to pre-filed testimony and pre-filed exhibits, shall be labeled "CONFIDENTIAL" and shall be deemed filed under seal. During evidentiary hearings, if any, in this proceeding, all persons present for such hearings shall be subject to the terms of this Protective Order and may be required to so affirm for purposes of the record. The portion of the record containing the Confidential Information, including the portions of transcripts of oral testimony discussing Confidential Information, shall be placed under seal.

8. The Commission and any other state agency that may have access to, or receive copies of, the Confidential Information will deem and treat such information as within the exemption from disclosure provided in the Pennsylvania Right-to-Know Act set forth in 65 P.S. § 67.708(b) until such time as the information may be found to be non-proprietary by the Commission or by a court of competent jurisdiction.

9. Confidential Information which is placed on the record of this proceeding under seal shall remain with the Commission under seal after the conclusion of the proceeding. If such Confidential Information is provided to appellate courts for the purposes of appeal(s) from this proceeding, such information shall be provided, and shall remain, under seal.

10. Upon the final resolution of proceedings in which Confidential Information has been provided, which includes the exhaustion of appeals, if any, all documents and other materials containing Confidential Information shall, within 30 days of the producing party's request, be either: (1) returned to counsel for the producing party; or (2) destroyed. If a receiving party chooses to destroy the Confidential Information, then it shall, in the case of the BI&E, notify the producing party, and in the case of all other parties, certify to the producing party, that the Confidential Information has been destroyed by it and its employees, consultants, and other representatives, and that the terms of this Protective Order have been satisfied. Provided, however, that the BI&E, the OCA, and the Office of Small Business Advocate may maintain in their official files copies of all pleadings, briefs, statements, exhibits and transcripts in this proceeding and, further provided, that all such pleadings, briefs, statements, exhibits and transcripts containing Confidential Information shall remain subject to the terms of this Protective Order.

11. A single copy of documents returned to the producing party or certified as destroyed upon resolution of this proceeding, as provided in this Protective Order, shall be kept on file at the producing party's offices for two years after the final resolution of this proceeding, as defined previously, for review by the parties under the terms of this Protective Order upon at least twenty days' notice to counsel for the producing party.

12. The issuance of this Protective Order shall not prejudice the producing party's right to challenge the production of any documents or information sought in discovery by any party on the grounds that such documents or information are not properly discoverable.

IT IS HEREBY ORDERED:

Deputy Chief Administrative Law Judge Joel H. Cheskis

Dated: _____, 2019

Administrative Law Judge Andrew M. Calvelli

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

PETITION OF PENNSYLVANIA- :
AMERICAN WATER COMPANY :
WASTEWATER OPERATIONS FOR :
APPROVAL OF MODIFICATION OF : DOCKET NO. P-2014-2431005
LONG-TERM INFRASTRUCTURE :
IMPROVEMENT PLAN :
:

TO WHOM IT MAY CONCERN:

The undersigned is the _____ of _____
(the receiving party).

The undersigned has read, and understands that, the Protective Order deals with the treatment of Confidential Information. The undersigned agrees to be bound by, and comply with, the terms and conditions of said Order, which are incorporated herein by reference.

SIGNATURE

PRINT NAME

ADDRESS

EMPLOYER

DATE: _____

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PENNSYLVANIA	:	
AMERICAN WATER COMPANY	:	
WASTEWATER OPERATIONS FOR	:	DOCKET NO. P-2014-2431005
APPROVAL OF MODIFICATION OF	:	
LONG TERM INFRASTRUCTURE	:	
IMPROVEMENT PLAN	:	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a copy of the **Prehearing Conference Memorandum on behalf of Pennsylvania-American Water Company** 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

The Honorable Joel H. Cheskis
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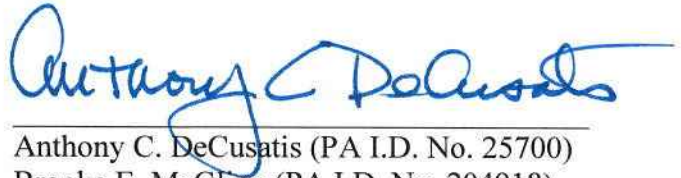
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Dated: March 1, 2019

Counsel for
Pennsylvania-American Water Company