

COMMONWEALTH OF PENNSYLVANIA
PUBLIC UTILITY COMMISSION

3

THE MUNICIPAL AUTHORITY OF THE:
TOWNSHIP OF ROBINSON,

Complainant - Petitioner,

vs.

PENNSYLVANIA AMERICAN WATER
COMPANY,

Respondent.

No. C-20030092

DOCKETED

OCT 23 2003

TRANSCRIPT OF DIRECT TESTIMONY OF RAYMOND H. ANTONELLI,
SR., P.E., taken in the above-entitled matter,
stenographically taken by William Schock, Court Reporter, at
3:05 p.m., Thursday, October 9, 2003, at the law offices of
Yukevich, Marchetti, Liekar & Zangrilli, 11 Stanwix Street,
Suite 1024, Pittsburgh, Pennsylvania 15222.

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PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

SCHOCK REPORTING SERVICE
SUITE 900 ALLEGHENY BUILDING
PITTSBURGH, PENNSYLVANIA 15219
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APPEARANCES:

ALBERT J. ZANGRILLI, ESQ., Yukevich,
Marchetti, Liekar & Zangrilli, 11 Stanwix Street, Suite 1024,
Pittsburgh, Pennsylvania 15222, appearing on behalf of the
Complainant-Petitioner.

- - -

1 RAYMOND H. ANTONELLI, SR., P.E.

2 DIRECT TESTIMONY

3 - - -

4 BY MR. ZANGRILLI:

5 Q. State your full name.

6 A. Raymond H. Antonelli, Sr.

7 Q. Are you employed?

8 A. Yes.

9 Q. Where are you currently employed?

10 A. NIRA Consulting Engineers, Inc.

11 Q. What position do you hold with NIRA Consulting
12 Engineers, Inc., which I will refer to as "NIRA"?

13 A. President.

14 Q. State your educational background.

15 A. Stowe High School, Pittsburgh Academy Prep School,
16 Triangle Technical School for drafting and
17 engineering and related subjects and the University
18 of Pittsburgh for approximately two plus years.

19 Q. Are you a registered professional engineer in the
20 Commonwealth of Pennsylvania?

21 A. Yes.

22 Q. How long have you been so registered?

23 A. Since 1982 or 21 years.

24 Q. Trace your employment history with respect to
25 engineering experience in water treatment and

1 distribution.

2 A. Swindell Dressler Corporation, 1957 to 1959; Green
3 International Engineering Company, 1959 to 1975; NIRA
4 Consulting Engineers, Inc., 1975 to present.

5 Q. For how many municipal authorities engaged in water
6 treatment and/or water distribution does NIRA
7 currently provide consulting engineering services?

8 A. Seven.

9 Q. Can you provide the names of these clients and for
10 how long NIRA has served these clients?

11 A. Ambridge Water Authority, 17 years; Findlay Township
12 Municipal Authority, 9 years; Conway Borough, 24
13 years; Municipal Authority of the Township of
14 Robinson, 21 years; Wilkinsburg-Penn Joint Water
15 Authority, 13 years; Oakmont Water Authority, 6
16 years; Harrison Township Water Authority, 17 years.

17 Q. Have you provided similar professional engineering
18 services to other water treatment and/or water
19 distribution authorities or municipalities in the
20 past?

21 A. Yes.

22 Q. Can you provide the names of these municipalities
23 and/or authorities and for how long you were their
24 consulting engineer?

25 A. Coraopolis Borough, 1977 to 2002; 24 years.

1 BY MR. ZANGRILLI:

2 Q. I am showing you a document marked Exhibit
3 Antonelli-1 and this exhibit is captioned "Western
4 Allegheny County Municipal Authority Water
5 Distribution Map" (February 2003).

6 Does this exhibit fairly depict the location of the
7 two interconnects between the MATR and WACMA water
8 systems?

9 A. Yes.

10 Q. When were the two interconnects constructed?

11 A. The original eight-inch interconnect was constructed
12 in approximately 1965. The 12-inch interconnect was
13 constructed in 2001.

14 Q. What are the water transmission capabilities of each
15 interconnect?

16 A. The eight-inch interconnect is capable of more than
17 one million gallons per day when pumping is utilized.
18 The new 12-inch interconnect should be capable of two
19 million or more gallons per day when pumping is
20 utilized.

21 Q. Did NIRA design any of these interconnects? Did NIRA
22 supervise the construction of any of these
23 interconnects?

24 A. Yes as to both questions.

25 Q. Can you identify improvements made to the MATR system

1 in order to serve WACMA?

2 A. In 2001 MATR constructed a new 12-inch water line
3 along Mobay Road a distance of about 1,600 feet. The
4 new 12-inch line was connected to the existing
5 eight-inch WACMA Interconnect. The new 12-inch pipe
6 was also extended an additional 2,400 feet as part of
7 the McMetro Commercial Development Project. This
8 additional extension made it possible to construct
9 the second metered connection to the WACMA System.

10 Q. What were the approximate costs to construct each?

11 A. \$121,595.68 in construction costs and approximately
12 \$24,000.00 in engineering and administrative costs
13 for the new 12-inch interconnect.

14 The original eight-inch line serving WACMA, based on
15 old maps, indicate a date of around 1965. The cost
16 of this original line is not known.

17 Q. What are the production capabilities of MATR's water
18 treatment plant?

19 A. Six million gallons per day.

20 Q. What interconnections does MATR have with other water
21 suppliers?

22 A. One interconnection with Coraopolis Borough and one
23 with the Moon Township Municipal Authority. Three
24 interconnects with the Pennsylvania-American Water
25 Company.

1 supply most or all of WACMA's system by gravity if
2 WACMA's Transmission and Distribution System was
3 upgraded to take advantage of this available
4 hydrostatic pressure.

5 Q. Can you explain the hydraulic gradient of the WACMA
6 system in terms of the distribution of water to be
7 supplied by PAWC pursuant to the WACMA-PAWC
8 Agreement?

9 A. The hydraulic gradient of the PAWC System in the
10 WACMA/Robinson Service Area is not capable of
11 supplying water to WACMA without the need to
12 continuously pump into the WACMA System. All three
13 of the interconnects between MATR and PAWC require
14 pumping. The only area of the WACMA System which I
15 am aware of which can be served without the need for
16 pumping is the Oakdale Area which is located in the
17 southern most sector of WACMA's System.

18 - - -

19 (Whereupon, Exhibit
20 Antonelli-2 was marked for
21 identification.)

22 - - -

23 BY MR. ZANGRILLI:

24 Q. I show you Exhibit Antonelli-2 and ask you to
25 identify this Exhibit.

- 1 A. This is a United States Geological Survey Topographic
2 Map showing several U.S.G.S. 7.5 minute quads.
- 3 Q. Does this exhibit show the location of the various
4 municipalities we have been talking about; namely,
5 Robinson Township, North Fayette Township, Moon
6 Township and Coraopolis Borough, among others?
- 7 A. Yes.
- 8 Q. Does this exhibit show the topography of these
9 municipalities?
- 10 A. Yes.
- 11 Q. Does this exhibit provide the topographical data you
12 utilized in your discussions of hydraulic gradients
13 in your earlier answers?
- 14 A. Yes.
- 15 Q. Are you able to express an opinion as to whether MATR
16 will be able to compete with PAWC to be WACMA's water
17 supplier at the expiration of the WACMA-PAWC
18 Agreement; that is, within 15 years?
- 19 A. Yes.
- 20 Q. What is your opinion and what is the basis for your
21 opinion?
- 22 A. Because WACMA would likely represent an even larger
23 portion of MATR's overall Water System at the
24 expiration of the WACMA-PAWC Agreement, MATR would
25 not likely have sufficient capacity to serve WACMA

1 unless planning and infrastructure improvements were
2 being made in anticipation of providing such service.
3 Without the benefit of a long-term Service Agreement
4 MATR could not afford to make the necessary
5 improvements and would therefore not be prepared to
6 provide service at the expiration of the WACMA-PAWC
7 Agreement when WACMA's consumptive demands will be
8 even greater because of the growth of North Fayette
9 Township.

10 Q. Can you form an opinion as to whether WACMA can
11 maintain the daily load factor of .75 during the term
12 of its agreement with PAWC?

13 A. Yes.

14 Q. What is your opinion and what is the basis for your
15 opinion?

16 A. Maintaining a daily load factor of .75 could be a
17 problem since the major portion of WACMA's water
18 distribution load is located in the Northern Sector
19 of North Fayette Township where the MATR and the Moon
20 Township Municipal Authority Water Systems have
21 historically supplied water to North Fayette. WACMA
22 distribution and transmission capabilities are
23 concentrated in the Northern Tier. Therefore,
24 interruptions of service from water line breaks in
25 the piping system coming from the South would affect

1 the largest segment of the system population. Under
2 such circumstances WACMA would need to look at MATR's
3 and MTMA's emergency interconnects for water. During
4 these periods it is likely that the load factor could
5 not be maintained.

6 Q. Have you had an opportunity to read the Water Sales
7 Agreement between PAWC and WACMA dated March 22,
8 2003?

9 A. Yes.

10 - - -

11 (Whereupon, at 3:35 p.m., the
12 direct testimony of Raymond H.
13 Antonelli, Sr., P.E. was
14 concluded.)

15 - - -

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WA-3

OVER SIZED DOCUMENTS

UPDATED : FEBRUARY 1999

Victor Murphy

WESTERN ALLEGHENY COUNTY MUNICIPAL AUTHORITY

WATER DISTRIBUTION MAP
NORTH FAYETTE TWP., ALLEGHENY CO., PA

February 2003

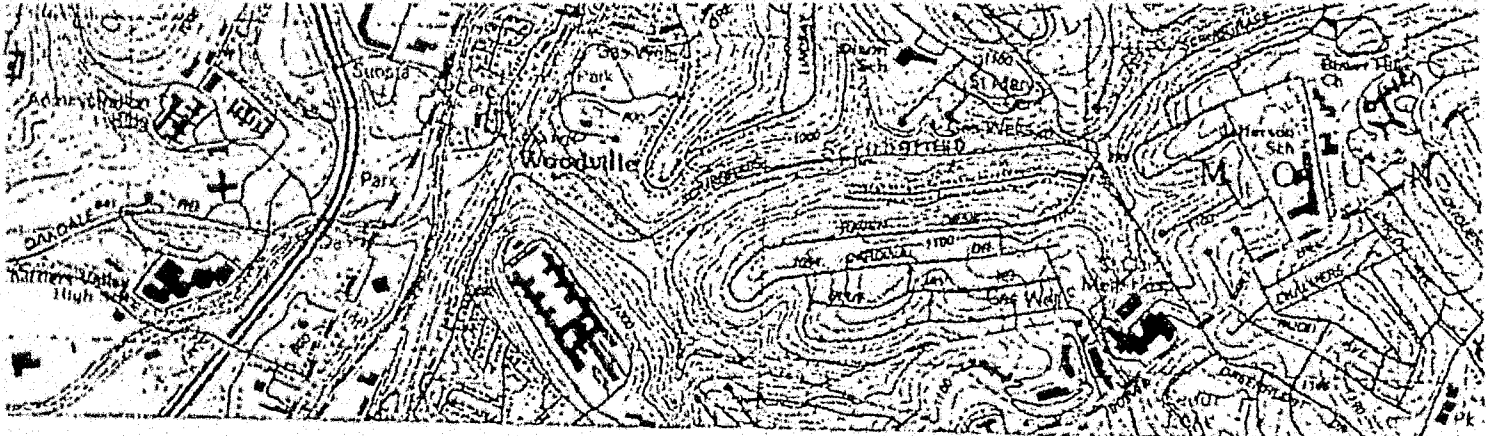
SCALE : 1"=1400'

SHEET NO. 1 of 1

EXHIBIT
ANTONELLI - 1

PLOT SCALE :

PLOT DATE : 04/01/03



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U.S.G.S. Topographic Map

THIS MAP IS A COPULATION OF SEVERAL U.S.G.S. 7.5 MINUTE QUADS
AMBRIDGE
CLINTON
CANONSBURG
EMSWORTH
OAKDALE
PITTSBURGH WEST

OVER SIZED DOCUMENTS

DATE: SEPT., 2003
DWN BY: JfC
CHK. BY: R.H.A.

PREPARED BY

NIRA Consulting Engineers, Inc.

950 FIFTH AVENUE
CORAOPOLIS, PA 15108

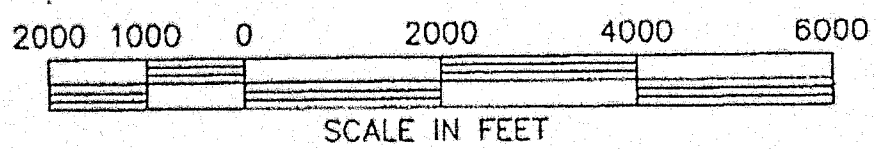


EXHIBIT
ANTONELLI - 2