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VIA e-Filing

February 24, 2020

Rosemary Chiavetta, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

**Re: Petition of Pennsylvania-American Water Company Wastewater
Division for Approval of Modification of Long-Term Infrastructure
Improvement Plan**

Docket No. P-2014-2431005

Dear Secretary Chiavetta:

In response to the Commission's letter dated February 20, 2020, enclosed are Responses of Pennsylvania-American Water Company – Wastewater Division (PAWC-WD) to the Bureau of Technical Utility Services Data Request TUS – Set 1 dated February 20, 2020 to PAWC-WD Modified Long Term Infrastructure Investment Plan, Questions 2(b) and 4(a).

A copy of the responses are being provided to the parties as indicated on the enclosed Certificate of Service.

Please contact me if you have any questions.

Sincerely,


Susan Simms Marsh

Enclosures

cc: Certificate of Service
K. Shaffer, Bureau of Technical Utility Services (E-mail) w/Enclosures

Responses of
Pennsylvania-American Water Company – Wastewater Division (PAWC-WD)
to the Bureau of Technical Utility Services
Data Request TUS – Set 1 dated February 20, 2020 to
PAWC-WD Modified LTIP
Docket No. P-2014-2431005

- 2) Reference the PAWC-WD LTIP, Section 1 - Types and Age of Eligible Property.
- b. Reference Page 23. PAWC-WD references an Appendix A and Appendix B. These appendices do not appear to have been included in the filing of the revised LTIP. Please provide Appendices A and B, or direct TUS staff to the location of these Appendices in any of the filings of PAWC-WD to this petition.

Response: Please see DR 2 Attachment 1 (Appendix A) and DR 2 Attachment 2 (Appendix B).

Responsible Witness: Bruce Aiton
Vice President - Engineering

DR 2 ATTACHMENT 1

Appendix A

Condition Assessment Schedule

District	Total Gravity LF	2018	2019	2020	2021	2022	# Manholes
<i>New Aquisition</i>							
Franklin	55,239		55,239				198
McEwensville	12,669		12,669				57
New Cumberland	144,692		56,900	87,792			608
Fairview North	165,600	159,505	6,095				869
Fairview South	198,722		45,940	152,782			1,050
Paint Elk	89,425		5,000	0	0		432
Marcel Lakes	N/A						N/A
<i>Consent Order</i>							
Scranton	1,739,568	363,000	609,000	767,568	0		9,055
McKeesport	690,280		552,224				3,236
Dravosburg	52,148		52,148				308
Duquesne	184,559		184,559				1,125
<i>Routine</i>							
Blue Mountain	0						0
Claysville	62,082		62,082				342
Clarion	200,860		111,300	89,560			930
Coatesville	352,945		30,000	30,000	30,000	30,000	1,670
Koppel	25,909		25,909				87
Lehman Pike	0						0
Pocono	150,648		75,000	75,648			777

DR 2 ATTACHMENT 2

Appendix B

Waste Water LTIIP		2019					2020					2021					2022					2023					2019-2023					
DISTRICT		Linear Footage	Manholes	Laterals	Lift Stations	Investment	Linear Footage	Manholes	Laterals	Lift Stations	Investment	Linear Footage	Manholes	Laterals	Lift Stations	Investment	Linear Footage	Manholes	Laterals	Lift Stations	Investment	Linear Footage	Manholes	Laterals	Lift Stations	Investment	Linear Footage	Manholes	Laterals	Lift Stations	Investment	
2447-PA-Clanton WW	DSIC Qualified	7,378	38	72		\$1.47	2,500	4	12	1	\$1.61	5,000	21	43	1	\$1.64	7,500	32	98	1	\$1.91	10,800	42	34		\$2.22	33,178	137	259	3	\$8.84	
2458-PA-Pocono WW		2,245	17	0		\$0.61	2,415	17	0		\$0.64	2,510	19	0		\$0.66	2,700				\$0.70	2,800				\$0.75	12,670	53	0	0	\$3.36	
2467-PA-Coatesville WW		1,524	9	32	0	\$0.71	3,901	14	37		\$1.54	4,647	22	74		\$2.37	7,783	20	58		\$2.15	8,406	19	127		\$2.35	26,261	84	328	0	\$9.11	
2469-PA-Lehman Pike WW		0	0	150		\$0.23	0	0	200		\$0.30	0	0	200		\$0.38	0	0	200		\$0.38	0	0	200	1	\$0.60	0	0	950	1	\$1.88	
2426-PA-Claysville WW		1,600	2	2		\$0.18	1,600	2	3	1	\$0.24	2,200	0	0	0	\$0.26	0	0	0	0	\$0.04	0	0	0	0	\$0.05	5,400	4	5	1	\$0.77	
2476-PA-Pocono BlueMtn WW		0	0	0		\$0.00	0	0	0		\$0.00	0	0	0	1	\$0.23	0	0	0		\$0.00	0	0	0		\$0.00	0	0	0	1	\$0.23	
Subtotal		12,747	66	256	0	\$3.18	10,416	37	252	2	\$4.33	14,357	62	317	2	\$5.54	17,983	52	356	1	\$5.17	22,006	61	361	1	\$5.96	77,509	278	1,542	6	\$24.19	
2435-PA-Koppel WW	Future-DSIC Qualified	1,000	6	20		\$0.38	1,500	8	10		\$0.41	1,750	5	20		\$0.46	2,500	15	40		\$0.52	2,750	15	35		\$0.71	9,500	49	125	0	\$2.47	
2438-PA-Point Elk Twp WW		2,400	11	19	0	\$0.46	0	0	0	4	\$1.36	3,200	12	25		\$0.99	5,300	27	58		\$1.01	5,900	27	50		\$1.08	16,800	77	152	4	\$4.89	
2460-PA-Fairview WW - NORTH		6,125	10	60	1	\$1.04	6,550	10	60		\$0.93	8,300	10	80		\$1.21	10,000	9	88		\$1.45	12,700	8	110		\$1.83	43,675	47	398	1	\$6.46	
2460-PA-Fairview WW-SOUTH		0			1	\$0.15	1,000				\$0.41	1,500		15		\$0.37	2,000		20		\$0.28	2,500		25		\$0.35	7,000	0	60	1	\$1.56	
2487-PA-New Cumberland WW		100			1	\$0.10	12,435	10	150		\$2.00	13,450	14	175		\$1.91	14,100	19	180		\$2.11	16,500	18	200		\$2.45	56,585	61	705	1	\$8.58	
2492-PA-Scranton WW		9,126	62	67		\$5.32	7,185	51	135		\$5.35	11,495	69	62		\$5.33	18,305	102	103		\$5.38	19,220	115	178		\$5.83	65,331	389	545	0	\$27.20	
2412-PA-Mckeesport		3,800	36	20	2	\$1.00	18,145	50	20		\$4.85	19,300	57	25		\$4.52	20,850	62	25		\$4.37	23,125	74	30		\$4.38	85,220	279	120	2	\$19.11	
2436-PA-Cin Trm WW		0				\$0.00	5,000	6	5		\$0.33	10,434	11	28		\$0.61	0	17	18		\$0.00	0	74	82		\$0.00	15,434	114	144	0	\$0.94	
2483-PA-Franklin WW		0	6	11		\$0.06	300				\$0.10	0				\$0.05	0			1	\$0.05	0			1	\$0.05	300	0	0	5	\$0.31	
2485-PA-McJannetsville WW		0			1	\$0.06	300			1	\$0.10	0			1	\$0.05	0				\$0.05	0			1	\$0.05	300	0	0	5	\$0.31	
Subtotal		22,551	131	197	6	\$8.50	52,115	135	380	5	\$15.75	69,429	178	430	1	\$15.44	73,055	251	532	1	\$15.17	82,695	331	710	1	\$16.67	299,845	1,026	2,249	14	\$71.53	
Total		35,298	197	453	6	\$11.68	62,531	172	632	7	\$20.07	83,786	240	747	3	\$20.98	91,038	303	888	2	\$20.34	104,701	392	1,071	2	\$22.63	377,354	1,304	3,791	20	\$95.71	
Regulatory																																
Consent Order-Mckeesport		21,044	55	100		\$9.55																3,000				\$1.21	24,044	55	100	0	\$10.76	
CMP - Coatesville WW		14,955	50	13	1	\$9.26																					14,955	50	13	1	\$9.26	
Total		71,297	302	566	7	\$30.50	62,531	172	632	7	\$20.07	83,786	240	747	3	\$20.98	91,038	303	888	2	\$20.34	107,701	392	1,071	2	\$23.84	416,353	1,409	3,904	21	\$115.73	
longterm Control-Scranton WW						\$14.60					\$6.82				\$0.00						\$2.85					\$6.66	0	0	0	0	\$30.93	

*combined sewer systems

Responses of
Pennsylvania-American Water Company – Wastewater Division (PAWC-WD)
to the Bureau of Technical Utility Services
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- 4) Reference the PAWC-WD LTIP, Section 6 - Acceleration of Infrastructure Replacement / Renewal
- a. Reference Page 40. PAWC-WD references an Appendix C. This appendix does not appear to have been included in the filing of the revised LTIP. Please provide Appendix C, or direct TUS staff to the location of Appendix C in any of the filings of PAWC-WD to this petition.

Response: Please see DR 4 Attachment 1 (Appendix C).

Responsible Witness: Bruce Aiton
Vice President - Engineering

Historical Annual Expenditures 2015 to 2019

Year	Projected Annual Expenditures	Projected Cumulative Expenditures	Actual Annual Expenditures	Actual Cumulative Annual Expenditures
2015	\$5,265,244	\$5,265,244	\$8,923,443	\$8,923,443
2016	\$5,290,000	\$10,555,244	\$5,509,055	\$14,432,498
2017	\$5,682,655	\$16,237,899	\$8,416,554	\$22,849,052
2018	\$5,097,241	\$21,335,140	\$4,810,440	\$27,659,492
2019	\$4,350,000	\$25,685,140		\$27,659,492
Total	\$25,685,140		\$27,659,492	

WW DSIC 2015

District	Funding Project Number	Work Order Number	Description:	Capital Investment
Claysville WW				
26	R24-26B1	R24-26B1.15-P-0002	Replacement of sewer main CV 60' 8" SDR CLAYSVILLE	\$1,583.69
26	R24-26H1	R24-26H1.15-P-0001	Lateral Replacement	\$8,575.13
26 Total		Claysville WW		\$10,158.82
Clarion WW				
47	R24-47B1	R24-47B1.15-P-0003	Sewer line replacement project within Clarion Borough. The project included the installation of approximately 1,300 LF of 6" and 8" sewer main and 7 manholes.	\$262,941.19
47	R24-47B1	R24-47B1.15-P-0004	Sewer line replacement project within Clarion Borough and Clarion Township. The project included the installation of approximately 1,300 LF of 6", 8" and 12" sewer main and 4 manholes.	\$203,362.48
47	R24-47B1	R24-47B1.15-P-0006	Sewer line replacement project within Clarion Borough and Clarion Township. The project included the installation of approximately 1,700 LF of 6", 8" and 10" sewer main and 9 manholes.	\$358,616.81
47	R24-47D1	R24-47D1.13-P-0002 R24-47D1.15-P-0002	Sewer line replacement project within Clarion Borough and Clarion Township. The project included the installation of approximately 2,200 LF of 6", 8", 12" and 15" sewer main and 18 manholes.	\$362,405.47
47	R24-47F1	R24-47F1.15-P-0003	Manhole Replacement project within Monroe Township. The project included the replacement and epoxy lining of 15 manholes.	\$57,631.08
47 Total		Clarion WW		\$1,244,957.03
Pocono WW				
58	R24-58B1	R24-58B1.15-P-0001	Sewer line replacement project within the Pocono Country Place development. The project included the installation of approximately 150 LF of 8" sewer main, 2 manholes and 10 laterals.	\$117,567.70
58	R24-58B1	R24-58B1.15-P-0002	Sewer line replacement project within the Pocono Country Place development. The project included the installation of approximately 1,196 LF of 8" sewer main, 6 manholes and 26 laterals.	\$444,954.60
58	R24-58C1	R24-58C1.15-P-0001	Emergency sewer main replacement work.	5,882.69
58	R24-58H1	R24-58H1.15-P-0001	The replacement of two sanitary sewer laterals within the Pocono Country Place development.	16,313.56
58	R24-58Q1	R24-58Q1.15-P-0005	Lift Station H replacement project within the Pocono Country Place development. The project included the installation of an above grade suction lift station containing two pumps, flow meter and a valve vault.	\$325,746.33
58 Total		Pocono WW		\$910,464.88
Coatesville WW				
67	I24-670004	I24-670004-01	Sewer line replacement project within the City of Coatesville. The project included the installation of approximately 2,529 LF of 8", 24", and 30" sewer main, 14 manholes and 64 laterals.	\$1,408,985.67
67	I24-670004	I24-670004-02	Sewer line replacement project within the City of Coatesville. The project included the installation of approximately 1,050 LF of 30" sewer main within a 60" casing pipe performed by microtunneling.	\$3,161,867.69
67	R24-67B1	R24-67B1.15-P-0001	Sewer line replacement project within Parkesburg Borough. The project included the installation of approximately 2,310 LF of 8" sewer main, 6 manholes and 61 laterals.	\$893,435.30
67	R24-67B1	R24-67B1.15-P-0002	Sewer line replacement project within Parkesburg Borough. The project included the installation of approximately 300 LF of 10" sewer main, 3 manholes and 2 laterals.	\$302,488.90
67	R24-67B1	R24-67B1.15-P-0004	Sewer line replacement project within the City of Coatesville. The project included the installation of approximately 450 LF of 8" sewer main, 1 manholes and 9 laterals.	\$152,917.06
67	R24-67B1	R24-67B1.15-P-0005	Sewer line replacement project within Parkesburg Borough. The project included the installation of approximately 679 LF of 10" sewer main, 4 manholes and 7 laterals.	\$232,354.12
67	R24-67C1	R24-67C1.15-P-0001	Five unscheduled sewer main replacement projects totaling approximately 45 feet of sewer main replacement.	87,428.61
67	R24-67F1	R24-67F1.15-P-0001	The replacement of two sanitary sewer manholes that were determined to be defective during inspection.	45,233.26
67	R24-67H1	R24-67H1.15-P-0001	The replacement of nine sanitary sewer laterals that were determined to be defective and require replacement during televising	\$56,992.03
67	R24-67Q1	R24-67Q1.15-P-0001	Submersible Pump replacement at West Sadsbury Lift Station	\$19,256.99
67	R24-67Q1	R24-67Q1.15-P-0007	Submersible Pump replacement at Sandy Hill Lift Station	\$13,554.32
67 Total		Coatesville WW		\$6,374,513.95
Marcel Lakes WW				

District	Funding Project Number	Work Order Number	Description:	Capital Investment
69	R24-69C1	R24-69C1.15-P-0001	One unscheduled sewer main replacement on the low pressure portion of the Marcel Lakes collection system including approximately 5 feet of 4" PVC.	\$2,544.21
69 Total		Marcel Lakes WW		\$2,544.21
Lehman Pike WW				
69	R24-69H1	R24-69H1.15-P-0001	2015 sewer lateral replacement project including the replacement of 260 1-1/4" laterals.	\$380,803.88
69 Total		Lehman Pike WW		\$380,803.88
Total				\$8,923,442.77

WW DSIC 2016

District	Funding Project Number	Description:	Installed Quantity	Capital Investment 2016
Clarion WW				
47	R24-47A1	Sewer extension to Chernicky Lift Station to connect Chernicky LS basin to Stone House Road Lift Station basin. Demolition of Chernicky LS is also part of the project	250	\$42,245
47	R24-47B1	Sewer line replacement projects within Clarion Borough and Clarion Township. The projects include the installation of approximately 4,160 LF of sewer mains.	4,160	\$698,077
47	R24-47C1	Emergency sewer main replacement work.		\$0
47	R24-47F1	Manhole replacements at locations determined to be deficient during annual manhole inspection program id required.	6	\$50,084
47	R24-47H1	Lateral replacements at locations determined to be deficient during annual inspection program.	3	\$14,102
47	R24-47Q1	Process Plant Facilities and Equip - Lift Stations		
47 Total		Clarion WW		\$804,508
Pocono WW				
58	I24-580005			\$0
58	I24-580004			\$0
58	R24-58B1	Sewer line replacement project within the Pocono Country Place development. The project included the installation of approximately 1,063 LF	1,063	\$71,154
58	R24-58C1	Emergency sewer main replacement work.		
58	R24-58F1	Manhole replacements at locations determined to be deficient during annual manhole inspection program id required.		
58	R24-58H1	Lateral replacements at locations determined to be deficient during annual inspection program.	2	\$8,618
58	R24-58Q1	Process Plant Facilities and Equip - Lift Stations		\$10,780
58 Total		Pocono WW		\$90,552
Coatesville WW				
67	I24-670004	West End Trunkline project including the installation of approximately 100 LF of 30" sewer main.	100 LF	\$192,681
67	R24-67B1	Sewer line replacement projects within the City of Coatesville and Parkesburg Borough. The project included the installation of approximately 4,593 LF of 8" and 12" sewer main, 26 manholes, and 84 laterals.	4593 LF	\$1,371,548
67	R24-67C1	Emergency sewer main replacement work.	53 LF	\$130,958
67	R24-67F1	Manhole replacements at locations determined to be deficient during annual manhole inspection program.	1 EA	\$8,997
67	R24-67H1	Lateral replacements at locations determined to be deficient during annual inspection program.	7 EA	\$60,866
67	R24-67Q1	Pump replacement at Millview and Providence Hill Lift Stations. Electrical Panel Replacement at Short Hill and Windy Hill Lift Stations.	3	\$26,327
67 Total		Coatesville WW		\$1,791,377
Lehman Pike WW				
69	I24-690001	Sanitary Sewer replacement of the Marcel Lakes Collection system including a portion of 33,000 LF of 8" and 12" sewer main project and 29 manholes.	6600 LF	\$2,416,744
69	R24-69C1	Emergency sewer main replacement work.		\$26,028
69	R24-69F1	Manhole replacements at locations determined to be deficient during annual manhole inspection program id required.	1	\$790
69	R24-69H1	2016 lateral replacement project to replace approximately 223 1-1/4" laterals	223	\$379,020
69 Total		Lehman Pike WW		\$2,822,582
Total				\$5,509,019

WW DSIC 2017

District	Funding Project Number	Description:	Installed Quantity	Capital Investment 2017
Clarion WW				
47	R24-47B1	Sewer line replacement projects	2,195 ft	\$377,160.86
47	R24-47C1	Emergency sewer main replacement work.	5 ft	\$45,045.34
47	R24-47F1	Manhole replacements at locations determined to be deficient during annual manhole inspection program id required.	3	\$21,518.07
47	R24-47H1	Lateral replacements at locations determined to be deficient during annual inspection program.	8	\$48,908.62
47	R24-47Q1	Process Plant Facilities and Equip - Lift Stations		
47 Total		Clarion WW	2,200 ft	\$492,632.89
Pocono WW				
58	R24-58B1	Sewer line replacement projects	2,105 ft	\$377,673.44
58	R24-58C1	Emergency sewer main replacement work.		\$15,675.86
58	R24-58F1	Valve replacements at locations determined to be deficient	1	\$932.36
58	R24-58H1	Lateral replacements at locations determined to be deficient during annual inspection program.	5	\$29,022.15
58	R24-58Q1			
58 Total		Pocono WW	2,105 ft	\$423,303.81
Coatesville WW				
67	R24-67B1	Sewer line replacement projects 65 laterals, and 26 manholes.	6,690 ft	\$2,059,647.91
67	R24-67C1	Emergency sewer main replacement work.	25 ft	\$19,616.66
67	R24-67D1	Sewer line relocation projects	300 ft	\$64,667.22
67	R24-67F1	Manhole replacements at locations determined to be deficient during annual manhole inspection program.	3	\$21,148.87
67	R24-67H1	Lateral replacements at locations determined to be deficient during annual inspection program.	8	\$50,459.20
67	R24-67Q1			
67 Total		Coatesville WW	7,015 ft	\$2,215,539.86
Lehman Pike WW				
69	R24-69B1	Sewer line replacement projects	ft	
69	R24-69C1	Emergency sewer main replacement work.	10 ft	\$16,403.45
69	R24-69F1	Valve replacements at locations determined to be deficient	1	\$1,744.05
69	R24-69H1	2017 lateral replacement project to replace approximately 300 1-1/4" laterals	115	\$301,413.17
69 Total		Lehman Pike WW	10 ft	\$319,560.67
Marcel Lake WW				
69	I24-690001	Sanitary Sewer replacement of the Marcel Lakes Collection system including a portion of 25,347LF of 8" and 12" sewer main, 3 lift stations, 275 laterals, and 125 manholes.	25,347 ft	\$4,965,516.61
69 Total		Marcel Lake WW	25,347 ft	\$4,965,516.61
Total				\$8,416,553.84

WW DSIC 2018

District	Funding Project Number	Description:	Installed Quantity	Capital Investment 2018 * Jan/Feb 2019
Clarion WW				
47	R24-47B1	Sewer line replacement projects (including manholes and laterals)	6,109 ft	\$1,104,265.40
47	R24-47C1	Emergency sewer main replacement work.	9 ft	\$13,765.33
47	R24-47F1	Manhole replacements at locations determined to be deficient during annual manhole inspection program id required.	7	\$29,243.61
47	R24-47H1	Lateral replacements at locations determined to be deficient during annual inspection program.	2	\$16,955.37
47	R24-47Q1	Process Plant Facilities and Equip - Lift Stations		
47 Total		Clarion WW	6,118 ft	\$1,164,229.71
Pocono WW				
58	R24-58B1	Sewer line replacement projects (including manholes and laterals)	2,023 ft	\$309,371.79
58	R24-58C1	Emergency sewer main replacement work.		\$10,958.01
58	R24-58F1	Manhole replacements at locations determined to be deficient during annual manhole inspection program id required.		
58	R24-58H1	Lateral replacements at locations determined to be deficient during annual inspection program.	27	\$27,503.18
58	R24-58Q1			
58 Total		Pocono WW	2,023 ft	\$347,832.98
Coatesville WW				
67	R24-67B1	Sewer line replacement projects (including manholes and laterals)	5,237 ft	\$2,150,159.87
67	R24-67C1	Emergency sewer main replacement work.		\$39,298.04
67	R24-67F1	Manhole replacements at locations determined to be deficient during annual manhole inspection program.	28	\$85,911.34
67	R24-67H1	Lateral replacements at locations determined to be deficient during annual inspection program.	108	\$102,365.89
67	R24-67Q1			
67 Total		Coatesville WW	5,237 ft	\$2,377,735.14
Lehman Pike WW				
69	R24-69B1	Sewer line replacement projects (including manholes and laterals)	5,700 ft	\$590,134.11
69	R24-69C1	Emergency sewer main replacement work.	ft	\$12,867.56
69	R24-69F1	Valve replacements at locations determined to be deficient	1	\$14,237.84
69	R24-69H1	Lateral replacement project	130	\$303,402.42
69 Total		Lehman Pike WW	5,700 ft	\$920,641.93
Total				\$4,810,439.76

2015	Mains (LF)		Manholes	Laterals	Lift Stations
	Gravity	LP/Force			
Blue Mountain Lake					
Lehman-Pike				260	
Pocono Country Place (Pocono)	1,346		8	38	1
Claysville	60				
Coatesville	7,363		30	152	2
Clarion	6,500		53		
Marcel Lake	5				
Total	15,274		91	450	3

*submersible pump replacements

2016	Mains (LF)		Manholes	Laterals	Lift Stations
	Gravity	LP/Force			
Blue Mountain Lake					
Lehman-Pike			1	223	
Pocono Country Place (Pocono)	1,063			2	
Claysville					
Coatesville	4,746		27	91	3
Clarion	4,410		6	3	
Marcel Lake	6,600		29	-	
Total	16,819	-	63	319	3

APPENDIX C

2017	Mains (LF)		Manholes / Valves	Laterals	Lift Stations
	Gravity	LP/Force			
Blue Mountain Lake					
Lehman-Pike		10		115	
Pocono Country Place (Pocono)	2,105			5	
Claysville					
Coatesville	7,015		3	8	
Clarion	2,200		3	8	
Marcel Lake	25,347		125	275	3
Total	36,667	10	131	411	3

2018	Mains (LF)		Manholes	Laterals	Lift Stations
	Gravity	LP/Force			
Blue Mountain Lake					
Lehman-Pike		5,700	1	152	
Pocono Country Place (Pocono)	2,023		10	47	
Claysville					
Coatesville	4,582	655	47	128	
Clarion	6,118		37	71	
Total	12,723	6,355	95	398	-

VERIFICATION

I, Bruce Aiton, Vice President - Engineering for Pennsylvania-American Water Company, hereby state that the facts set forth in the foregoing Responses of Pennsylvania-American Water Company - Wastewater Division (PAWC – WD) to the Bureau of Technical Utility Services Data Request TUS – Set 1 dated February 20, 2020 to PAWC-WD Modified LTIIP, Questions 2(b) and 4(a) 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: February 21, 2020



Bruce Aiton

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

Certificate of Service

I hereby certify that I have this day served a true and correct copy of Pennsylvania-American Water Company Wastewater Division's Responses to Data Requests served by the Bureau of Technical Utility Services on February 20, 2020, Set 1, Questions 2(b) and 4(a), in the above-referenced proceeding, upon the parties, listed below, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

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The above-referenced Responses to Data Requests were filed with the Pennsylvania Public Utility Commission on February 24, 2020, with a copy to Kenneth Shaffer.

Dated: February 24, 2020



Susan Simms Marsh, Esquire
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