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VIA E-Filing

February 26, 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 Improvement Plan, Questions 1 (a-c), 2(a) and 3(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 (Email) 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

- 1) Reference the PAWC-WD LTIP, Section 1 - Types and Age of Eligible Property.
- a. Reference Page 5. Under “Gravity,” provide clarification in regard to service laterals. Specifically, is PAWC-WD including the customer-owned portion of the service lateral when it refers to the “service laterals from the customer premise connect?” Is it PAWC-WD’s intent to replace customer-owned portions of the service lateral in its LTIP work?

Response: No, it is not the intent of PAWC-WD to replace the entirety of the customer-owned service laterals. However, when there is high influent at the connection of a service lateral to the sewer main the company may replace a portion of the service lateral to remedy or reduce the influent flow. This work is done either through the installation of a “top-hat” or through physical work on that portion in the right-of-way. This is only on a small percentage on an as needed basis.

- b. Reference Page 7, Table 2. The company notes that the entire customer service lateral on a gravity collection system is deemed to be DSIC-eligible property. Please clarify if PAWC-WD is including the customer-owned portion of the service lateral?

Response: No, PAWC-WD is not including the customer-owned portion of the service lateral. Table 2 does not include a breakdown of service laterals. Please note: Page 11 “*Service lateral replacement/rehabilitation -Work may consist of replacing gravity or low pressure sewer laterals.....Only the portion of the service lateral owned by PAWC is included in the scope of replacement/rehabilitation.*”

- c. Reference Page 14, Figure 2. Figure 2 notes that 53.8% of the Gravity Main Material breakdown by length is unknown. Describe in detail how PAWC-WD plans to reduce the amount of unknown Gravity Main Material.

Response: PAWC-WD has two paths to reducing the amount of unknown Gravity Main Material. The company performs regular maintenance of the wastewater collections systems. Regular maintenance and operation of the wastewater collection system includes regular cleaning and camera inspection of the collection pipe and manholes. During this routine process, the material and condition of the pipe is logged and entered in our data base. Additionally, often in the first years of ownership it is prudent and necessary to perform a more rigorous initial evaluation of the system. This initial evaluation of the system is often regulatory driven due to performance of the system in the years leading up to the acquisition by

PAWC-WD. In the evaluation process much of the system is cleaned and inspected. Condition assessment of pipe and manholes is done along with notation of type of material. This assessment also facilitates hydraulic modeling of the wastewater system to identify and plan for elimination of performance issues in the system.

Responsible Witness: Bruce Aiton
Vice President - Engineering

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 2 - Schedule for Planned Rehabilitation and Replacement of Eligible Property.
- a. Reference Page 18. Under “Service lateral replacement / rehabilitation” PAWC-WD describes the work related to service lateral replacements and/or rehabilitation. Provide clarification on whether PAWC-WD plans to replace or line customer-owned portions of the service lateral. If PAWC-WD plans to replace or line customer-owned portions of the service lateral, explain how what is outlined in the LTIP complies with the requirements of 66 Pa. C.S. § 1311(b).

Response: No, PAWC-WD does not plan to replace or line customer-owned portions of the service lateral.

Responsible Witness: Bruce Aiton
Vice President - Engineering

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 LTIIIP
Docket No. P-2014-2431005

- 3) Reference the PAWC-WD LTIIIP, Section 4 - Estimate of the Quantity of Property to be Improved.
- a. Reference Page 38, Table 8. Please indicate if the service laterals listed in the table include any customer-owned portions of the sewer lateral. If yes, explain how that inclusion complies with the requirements of 66 Pa. C.S. § 1311(b).

Response: No, the data shown is an estimate of the number of company-owned portions of the service laterals. Please note the quantity is shown as each “ea”. Not a linear footage.

Responsible Witness: Bruce Aiton
Vice President - Engineering

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 1 (a-c), 2 (a) and 3(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: 2/25, 2020



Bruce Aiton

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Pennsylvania-American	:	
Water Company Wastewater Operations	:	
for Approval of Modification of Long-Term	:	Docket No. P-2014-2431005
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 1 (a-c), 2(a) and 3(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

Scott B. Granger, Esq.
PA Public Utility Commission
Bureau of Investigation and Enforcement
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The above-referenced Responses to Data Requests were filed with the Pennsylvania Public Utility Commission on February 26, 2020, with a copy to Kenneth Shaffer.

Dated: February 26, 2020



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