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| PUC logo | COMMONWEALTH OF PENNSYLVANIA  PENNSYLVANIA PUBLIC UTILITY COMMISSION  400 NORTH STREET, HARRISBURG, PA 17120 | **IN REPLY PLEASE REFER TO OUR FILE** |

August 11, 2020

Docket No. R-2020-3020919

Utility Code 210060

THOMAS J SNISCAK

HAWKE MCKEON AND SNISCAK LLP

100 NORTH TENTH STREET

HARRISBURG PA 17101

[tjsniscak@hmslegal.com](mailto:tniesen@tntlawfirm.com)

RE: Audubon Water Company Supplement No. 3 to Tariff Water – Pa. PUC No. 4 at Docket No. R-2020-3020919

Dear Attorney Sniscak:

On July 20, 2020, Audubon Water Company filed the above-captioned document with the Public Utility Commission. For the Commission to complete its analysis of the filing, responses are required for the attached data requests. Please forward the requested information to the Commission within 10 business days of the date of this letter.

During the pendency of the current Proclamation of Disaster Emergency, the Commission shall only accept e-filings in lieu of paper filings for all documents. Please e-file your responses at <http://www.puc.pa.gov/efiling/default.aspx>. A list of allowable e-filing document types is available at <http://www.puc.pa.gov/efiling/DocTypes.aspx>. All filings containing confidential or proprietary information shall be filed with the Commission by e-mailing the Secretary at [rchiavetta@pa.gov](mailto:rchiavetta@pa.gov). Use of encryption with the prior consent of the Secretary is permitted. All documents requiring notary stamps must have original signatures.

**Please note that your answers must be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

*I,* [print name of appropriate company representative], *hereby state that the facts above set forth 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 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).*

Signature \_\_\_\_\_\_\_\_

Title \_\_\_\_\_\_\_\_\_\_\_\_

Date \_\_\_\_\_\_\_\_\_\_\_\_

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the filing, please send a copy of the information to Paul Zander via e-mail at[**pzander@pa.gov**](mailto:pzander@pa.gov). Questions may be directed to Paul Zander in the Bureau of Technical Utility Services, Water/Wastewater Division at telephone number (717) 783-1372. Thank you in advance for your cooperation.

****Sincerely,

Rosemary Chiavetta

Secretary

Enclosure – TUS Data Request Set 2

cc: Tanya McCloskey, Office of Consumer Advocate (w/enclosure), [tmccloskey@paoca.org](mailto:tmccloskey@paoca.org)

John Evans, Office of Small Business Advocate (w/enclosure), [jorevan@pa.gov](mailto:jorevan@pa.gov)

Richard Kanaskie, PUC Bureau of Investigation and Enforcement (w/enclosure), [rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

1. The filing’s Section A, Page A-12 indicates that Audubon’s current usable storage capacity consists of four standpipes with a capacity in excess of 1.5 million gallons with a fifth tank currently under construction having a capacity of 300,000 gallons to be placed into service in the future test year. However, Audubon’s most recent base rate case at Docket No. R-2012-2286118 indicated in Section A, Page A-11 that Audubon’s current usable storage capacity consists of five standpipes with a capacity in excess of 1.8 million gallons with a sixth tank planned for construction having a capacity of 60,000. Please provide contracts, invoices and dated and captioned pictures of all existing Audubon storage facilities, including tanks required for chlorine contact time, and state which facilities, if any, are out of service or are currently under construction.
2. The filing’s Section A, Page A-12 indicates a fifth tank currently under construction having a capacity of 300,000 gallons to be placed into service in the future test year. However, the filing’s Schedules E-4 and E-5 do not appear to include entries describing this work. Please clarify this discrepancy.
3. Please provide copies of all Department of Environmental Protection Water Quality Management operating permits applicable to Audubon’s water storage facilities.
4. The account codes shown on the schedules provided in the filing’s Section J do not appear to comply with the Uniform System of Accounts for Class A Water Utilities prescribed by National Association of Regulatory Utility Commissioners (NARUC). Please provide a chart of accounts that converts the account codes used by Audubon, on the schedules provided in the filing’s Section J, to the equivalent NARUC uniform system of account numbers.
5. Audubon’s 2019 Annual Water Audit filed with the Commission identified non-revenue water as a percent by volume of water supplied to be 32.1%. Please describe Audubon’s leak detection and any other water loss prevention efforts being under undertaken to reduce this performance indicator.