



**Elizabeth Rose Triscari**

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September 4, 2020

**VIA ELECTRONIC FILING**

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

**In Re: Application and Related filings of Pennsylvania-American Water Company under Sections 507, 1102(a), and 1329 of the Pennsylvania Public Utility Code, 66 Pa C.S. §§507, 1102(a), 1329, for approval of its acquisition of the wastewater system assets of Royersford Borough, related to wastewater service rights, fair market valuation, ratemaking treatment, collection of distribution system improvement charge, deferral of the post-acquisition improvement costs and claim for transaction and closing costs  
Docket No. A-2020-3019634, et al.**

Dear Secretary Chiavetta:

Enclosed for filing with the Commission is the revised Response No. 8 of Pennsylvania-American Water Company to the 66 Pa. C.S. Section 1329 Application Completeness Review of Pennsylvania-American Water Company – Wastewater Division Acquisition of Royersford Borough Wastewater System at Docket No. A-2019-3019634 Missing Application Information, dated August 6, 2020.

Copies are being served upon the advocates in accordance with the attached Certificate of Service and in accordance with the Commission's *Final Supplemental Implementation Order* entered February 28, 2019 at Docket No. M-2016-2543193.

Rosemary Chiavetta, Secretary  
September 4, 2020  
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Please do not hesitate to contact me if you have any questions.

Sincerely,



Elizabeth Rose Triscari

enclosures

cc: Attached Certificate of Service (*via electronic mail*)  
Sean Donnelly, Bureau of Technical Utility Service (*via electronic mail*)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Pennsylvania-American Water Company :  
under Section 1102(a) of the Pennsylvania Public Utility Code, 66 :  
Pa. C.S. § 1102(a), for approval of (1) the transfer, by sale, of :  
substantially all of the Royersford Borough assets, properties and :  
rights related to its wastewater collection and treatment system to : Docket No. A-2020-3019634  
Pennsylvania-American Water Company, and (2) the rights of :  
Pennsylvania-American Water Company to begin to offer or :  
furnish wastewater service to the public in the Royersford :  
Borough, and portions of Upper Providence Township, :  
Montgomery County, Pennsylvania. :

In re: Application of Pennsylvania-American Water Company :  
under Section 1329 of the Pennsylvania Public Utility Code, 66 : Docket No. A-2020-\_\_\_\_\_  
Pa. C.S. § 1329, for approval of the use for ratemaking purposes :  
of the lesser of the fair market value or the negotiated purchase :  
price of the Royersford Borough assets related to its wastewater :  
collection and treatment system. :

Petition of Pennsylvania-American Water Company, related to its :  
acquisition of the Royersford Borough wastewater collection and :  
treatment system, for approval under Section 1329 of the :  
Pennsylvania Public Utility Code, 66 Pa. C.S. § 1329, to (i) collect : Docket No. P-2020-\_\_\_\_\_  
a distribution system improvement charge, (ii) for book and :  
ratemaking purposes, accrue Allowance for Funds Used During :  
Construction for post-acquisition improvements not recovered :  
through the distribution system improvement charge, (iii) for book :  
and ratemaking purposes, defer depreciation related to post- :  
acquisition improvements not recovered through the distribution :  
system improvement charge, and (iv) include, in its next base rate :  
case, a claim for transaction and closing costs. :

In re: Filing by Pennsylvania-American Water Company under : Docket No U-2020-\_\_\_\_\_  
Section 507 of the Pennsylvania Public Utility Code, 66 Pa. C.S. :  
§ 507, of the Asset Purchase Agreement Between Pennsylvania- :  
American Water Company and the Royersford Borough :  
:

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 4th day of September served a true copy of the foregoing filing upon the parties, listed below in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

**VIA ELECTRONIC MAIL**

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Respectfully submitted,



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**Attorneys for**  
***Pennsylvania-American Water Company***

**66 Pa. C.S. Section 1329 Application Completeness Review  
Pennsylvania-American Water Company – Wastewater Division  
Royersford Borough Wastewater System - Docket No. A-2020-3019634**

**Missing Application Information**

8. Checklist Item No. 16.c. – The Application’s Appendix A-16-c includes a written description of the boundaries of the proposed service territory which describes one segment as “[...] From Point 1, follow the Municipal boundary and County boundary in a northwestern direction within the centerline of the Schuylkill River approximately 5,700 ft. to the intersection of Limerick municipal boundary and Chester County boundary, said intersection being Point 2. [...]” which does not utilize bearing angles and distances. Please amend the Application’s Appendix A-16-c to include a written description by bearing angles and distances for all boundary segments of the proposed service territory.

**Response:**

Please see **Amended Appendix A-16-c** and **Amended Appendix A-16-d through e**.

**Application of Pennsylvania-American Water Company for Acquisition of  
the Wastewater Assets of Royersford Borough  
66 Pa. C.S. §1329  
Application Filing Checklist – Water/Wastewater  
Docket No. A-2020-3019634**

16. Map of Service Area - provide a scalable map or plan of suitable scale highlighting the boundaries of the proposed service area that includes:
- a. The extent of the proposed service area with any existing adjoining service areas identified.
  - b. A north arrow depicting map orientation.
  - c. A written description of the boundaries for the service territory utilizing bearing angles and distances.
  - d. Size of the service territory area in terms of acres or square miles.
  - e. Identification and depiction of all municipal boundaries relative to the service area.
  - f. Depiction of the location or route of the waterworks or wastewater collection, treatment or disposal facilities.

**AMENDED RESPONSE:**

For subparts a. through b. and d. through e., see **Appendix A-16-a through b and Amended Appendix A-16-d through e.**

For the descriptions called for in subpart c., see written descriptions of the boundaries of the service territory utilizing bearing angles and distances marked as **Amended Appendix A-16-c.**

For the depiction of the location or route of the waterworks or wastewater collection, treatment or disposal facilities please see **CONFIDENTIAL Amended Appendix A-16-f.**

**Amended Appendix A-16- c  
Amended Appendix A-16-d through e**

**Starting Point: At the southeast intersection of the municipal boundaries of Royersford, Spring City and Upper Providence PA where Chester County meets Montgomery County.**

From	To	Bearing	Distance(Ft)
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From Point 1, follow the municipal boundary and county boundary in a northwestern direction within the approximate centerline of the Schuylkill River approximately 5,700ft to the intersection of Limerick municipal boundary and Chester County boundary

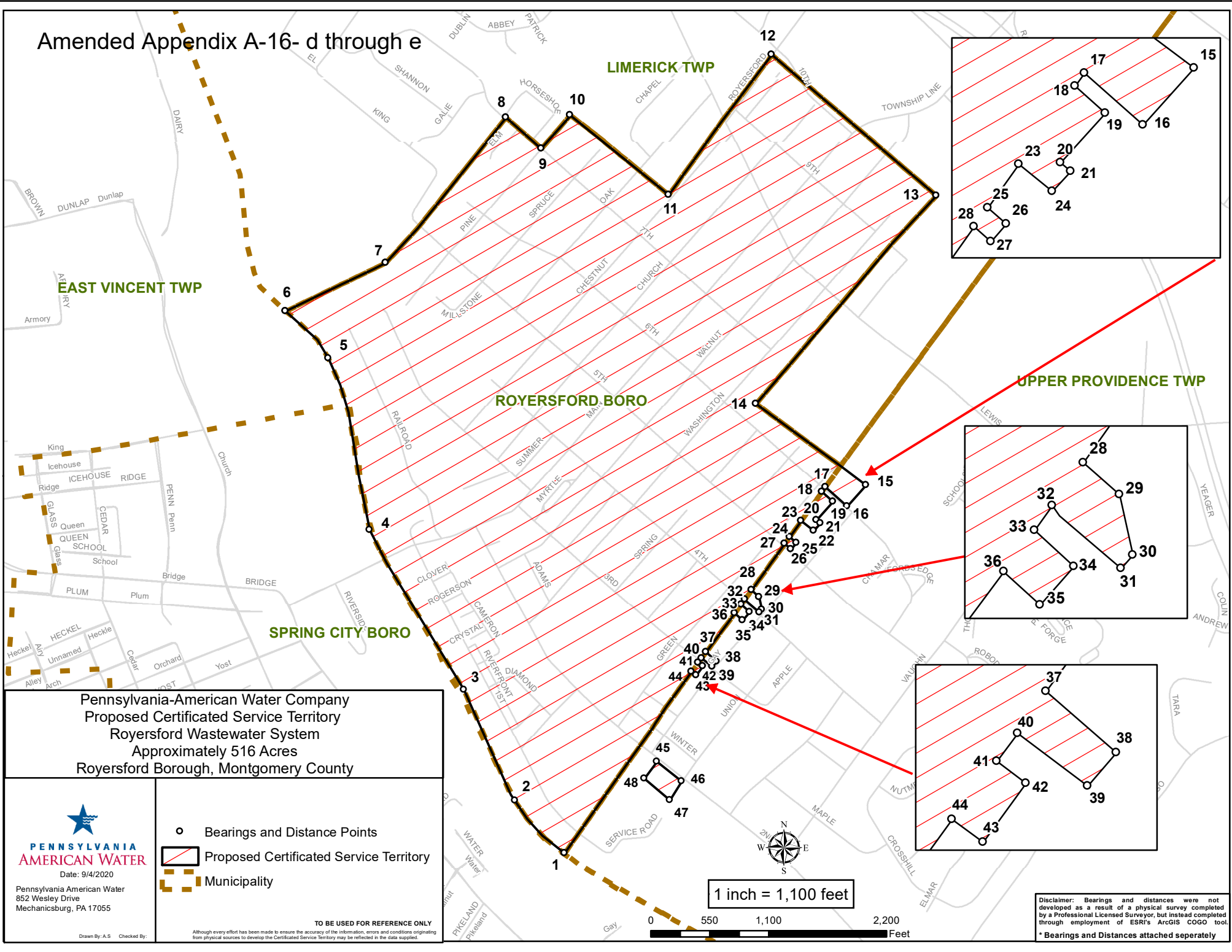
1	2	N43°04'15"W	674.755
2	3	N24°46'23"W	1136.418175
3	4	N30°29'37"W	1733.740263
4	5	N13°30'32"W	1649.700964
5	6	N42°12'32"W	592.437851
6	7	N64°16'13"E	1034.877059
7	8	N39°35'16"E	1761.248213
8	9	S48°54'35"E	440.646878
9	10	N40°39'14"E	409.499901
10	11	S51°03'16"E	1181.409632
11	12	N36°21'20"E	1623.1478
12	13	S49°26'11"E	2020.065379
13	14	S40°49'45"W	2570.133122
14	15	S53°28'19"E	1274.762344
15	16	S41°45'23"W	263.908104
16	17	N48°28'14"W	270.446395
17	18	S35°38'31"W	55.303939
18	19	S48°28'15"E	140.104749
19	20	S42°12'46"W	230.640454
20	21	S49°04'46"E	46.660579
21	22	S42°56'12"W	92.839795
22	23	N51°15'05"W	147.864329
23	24	S35°38'31"W	184.544285
24	25	S49°19'04"E	85.254123
25	26	S41°35'12"W	81.127733
26	27	N48°23'12"W	76.939274
27	28	S35°32'38"W	532.503092
28	29	S48°38'37"E	94.756565
29	30	S12°35'09"E	121.36141
30	31	S41°25'10"W	35.109481
31	32	N47°43'16"W	182.337623
32	33	S35°55'21"W	59.577412
33	34	S47°36'18"E	104.451556
34	35	S41°00'26"W	100.313452
35	36	N47°33'41"W	96.476838
36	37	S36°39'30"W	452.199056
37	38	S48°49'01"E	133.920317
38	39	S40°53'49"W	62.834326
39	40	N52°58'25"W	125.154877
40	41	S37°01'35"W	50.010955
41	42	S52°58'25"E	52.553708
42	43	S35°58'21"W	104.199046
43	44	N54°17'34"W	55.320713
44	1	S34°57'42"W	2068.728019



# Amended Appendix A-16-c

<b>From</b>	<b>To</b>	<b>Bearing</b>	<b>Distance(Ft)</b>
45	42	S51°32'27"E	296.542218
46	43	S31°42'08"W	207.056671
47	44	N50°20'29"W	312.424299
48	41	N36°00'01"E	199.261327

# Amended Appendix A-16- d through e

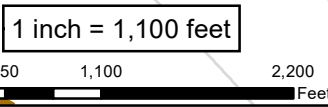


Pennsylvania-American Water Company  
 Proposed Certificated Service Territory  
 Royersford Wastewater System  
 Approximately 516 Acres  
 Royersford Borough, Montgomery County

**PENNSYLVANIA AMERICAN WATER**  
 Date: 9/4/2020  
 Pennsylvania American Water  
 852 Wesley Drive  
 Mechanicsburg, PA 17055

- Bearings and Distance Points
- ▨ Proposed Certificated Service Territory
- ▭ Municipality

**TO BE USED FOR REFERENCE ONLY**  
 Although every effort has been made to ensure the accuracy of the information, errors and conditions originating from physical sources to develop the Certificated Service Territory may be reflected in the data supplied.



**Disclaimer:** Bearings and distances were not developed as a result of a physical survey completed by a Professional Licensed Surveyor, but instead completed through employment of ESRI's ArcGIS COGO tool.  
 \* Bearings and Distances attached separately