

**66 Pa. C.S. Section 1329 Application Completeness Review  
Pennsylvania-American Water Company – Wastewater Division Acquisition of  
Valley Township Wastewater System Assets at Docket No. A-2020-3020178**

**Missing Application Information**

3. Checklist Item No. 12 – The *pro forma* tariff supplement included in the Application’s Appendix A-12 specifies on Original Page 11.XX that all metered customers are subject to a service charge per “Customer Unit” (Customer Unit) and that this service charge includes the first 3,400 gallons of water usage per month per Customer Unit. However, Valley Township’s rates, rules and regulations provided in the Application’s Appendices A-18-a and A-18-b do not indicate that a customer’s service charge, or the volume of water included in a customer’s service charge, is based on Customer Units. Please amend the Application’s Appendix A-12 to include a proposed tariff containing a rate equal to the existing rates of the seller at the time of acquisition.

**Response:** Please see **Second Amended Appendix A-12**.

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4. Checklist Item No. 12 – The pro forma tariff supplement included in the Application’s Appendix A-12 specifies on Original Page 11.XX that all customers not metered for water consumption are subject to a service charge per Equivalent Dwelling Unit (EDU). Also, Appendix D of Valley Township’s 2019 Chapter 94 Report, included as the Application’s Appendix A-20-c, encompasses Chapter 18 of Valley Township’s Code of Ordinances. This Code of Ordinances includes a schedule indicating how Valley Township calculates EDUs on Page 18-9. This schedule does not conform with the definition for EDU indicated in Page 21 of PAWC’s effective wastewater tariff, which defines EDU as “a measure based upon the estimated average daily wastewater flow for the type of business, as calculated by the [Pennsylvania Department of Environmental Protection] Regulation at 25 Pa Code: 73.17 divided by the typical estimated average daily wastewater flow from a current single-family unit.” Please amend the Application’s Appendix A-12 to include a proposed tariff containing a rate equal to the existing rates of the seller at the time of acquisition.

**Response:** Please see **Second Amended Appendix A-12** and **Amended Appendix A-18-b**.