

Missing Application Information

1. Checklist Item No. 7 - The Application's Appendix A-7.2 includes a copy of the agreement between Gannett Fleming Valuation and Rate Consultants, LLC (GFVRC) and Valley Township and several invoices. However, Appendix A-7.2 does not state the total fees paid to GFVRC for providing the completed appraisals for the acquisition. Please amend the Application's Appendix A-7.2 to include a statement quantifying the total fees paid to GFVRC for providing the completed appraisals for the acquisition.
2. Checklist Item No. 12 – The Application's Appendix A-4.1 contains a response to Standard Data Request (SDR) Item No. 6, which lists three buildings receiving free service from Valley Township. However, the *pro forma* tariff supplement included in the Application's Appendix A-12-a does not contain a copy of a proposed tariff containing a rate equal to the existing rates of the seller at the time of acquisition or other supporting documentation evidencing that Valley Township will change the rates charged to customers identified in SDR Item No. 6 to match proposed tariff rates prior to closing. Please amend the Application's Appendix A-12 to include a proposed tariff containing a rate equal to the existing rates of seller at the time of acquisition for all customers.
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.
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

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

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.

5. Checklist Item No. 14. – “PAWC Exhibit KEG-1 WW” is identified on Page 3, Line 3 of the Application’s Appendix A-14-a, PAWC Statement No. 1 WW. However, PAWC Exhibit KEG-1 WW was not provided in the Application. Please amend the Application’s Appendix A-14-a to include a copy of PAWC Exhibit KEG-1 WW.
6. Checklist Item No. 15.a. – The Application’s Appendix A-15-a, Engineering Assessment and Original Cost (Engineer’s Assessment) does not separately identify utility plant held for future use. The facility information sheets included in Section 4 of the Engineering Assessment identify two odor control systems as “inactive” or “not in use” and a portable winch as “not installed”. However, it is not clear if these, or any other, assets are held for future use. Please amend the Application’s Appendix A-15-a to separately identify any utility plant that is held for future use.
7. Checklist Item No. 15.a – The List of Assets and Costs provided in Section 9 of the Engineer’s Assessment appears to include assets that are no longer used and useful with other assets that still are used and useful. For example, a line item under the list of Rock Run assets that states “6” CIP Force Main – Original Installation (partially abandoned)”. Please amend the Application’s Appendix A-15-a to revise the inventory of used and useful assets to exclude or separately identify assets that are not used and useful plant assets to be transferred or utility plant held for future use.
8. Checklist Item No. 15.d. – The Application’s Appendix A-15-d contains a response that refers to the Application’s Appendix A-16-f, Valley Township Sewer System Overview, to provide the elevations of major facilities and service areas. Appendix A-16-f does not clearly state the elevations of major facilities or service areas and instead relies on the interpolation of illegible contour lines. Please amend the Application’s Appendix A-15-d to state the approximate elevations of major facilities.
9. Checklist Item No. 16.a – The Application’s Page 12, Section 38 indicates the service area comprising the requested territory is consistent with Valley Township’s “Service Area” and “the Act 537 Service Area within [Valley Township]”. However, the requested service territory map provided as the Application’s Appendix A-16-a appears to include areas that are described as not requiring public utilities in Chapter IV, Page IV-3, Table IV-1 and Appendix M of the Valley Township Act 537 Plan Official Sewage Facilities Plan (Valley Act 537 Plan), provided as the Application’s Appendix A-22-b, including certain areas designated as “conservation”. Please amend the Application’s Appendix A-16-a to include a

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

revised requested service territory map that is consistent with the approved Act 537 Official Sewage Facilities Plan (Act 537 Plan) for each affected municipality.

10. Checklist Item No. 18.b. – The Application’s Appendix A-18-a includes Valley Township Ordinance No. 2012-11, which amends Sections 205.1 and 205.2 in Chapter 18 – Sewers and Sewage Disposal of the Valley Township Code of Ordinances. The Application’s Appendix A-18-b does not include Chapter 18 – Sewers and Sewage Disposal, of the Valley Township Code of Ordinances. Please amend the Application’s Appendix A-18-b to include a current copy of all Valley Township’s rules and regulations for service.
11. Checklist Item No. 19.a – The Valley Township Annual Audit and Financial Report as of December 31, 2019 (2019 Financial Report), included in the Application’s Appendix A-19-a, is missing Page 17. Please amend the Application’s Appendix A-19-a to include a copy of Page 17.
12. Checklist Item No. 20.b. – The Engineer’s Assessment identified six Valley Township-owned pump stations and one undedicated pump station permitted to Valley Township (Hill View Pump Station) and included copies of several water quality management (WQM) permits, issued by the Department of Environmental Protection (DEP), applicable to the pump stations identified. However, the Application’s Appendix A-20-b does not include copies of or a reference to the copies of the DEP WQM permits provided in the Engineer’s Assessment and appears to be missing copies of DEP permits applicable to the Country Ridge pump station. Please amend Appendix A-20-b to include copies of the following documentation:
 - a. Any DEP WQM permits and permit amendments applicable to the Country Ridge pump station;
 - b. The original WQM permit for the Rock Run pump station and subsequent amendments to that permit; and
 - c. Any DEP WQM permits and permit amendments related to the Hill View pump station.
13. Checklist Item No. 22.b – The Application’s Appendix A-22-b does not include evidence that the Valley Act 537 Plan Revised October 1, 2008 was approved by DEP. Please amend the Application’s Appendix A-22-b to provide evidence the Valley Act 537 Plan was approved by the DEP.

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

14. Checklist Item No. 22.a – The Application’s Appendix A-22-a includes a copy of a letter from Valley Township indicating that Valley Township’s sanitary sewer system is compliant with the Valley Act 537 Plan. This letter does not demonstrate that the extent of the boundaries of the requested service territory depicted in the Application’s Exhibit A-16-a are compliant with the Act 537 Plans for Valley, Sadsbury, East Fallowfield and West Caln Townships. Please amend the Application’s Exhibit A-22-a to provide evidence that the extent of the boundaries of the requested service territory are compliant with the Act 537 Plan for each affected municipality.
15. Checklist Item No. 22.b – The Application’s Appendix A-22-b does not include a copy of the DEP-approved Act 537 Plan for each affected municipality, including East Fallowfield, Sadsbury and West Caln Townships. Please amend the Application’s Appendix A-22-b to provide either a copy of the Act 537 Plan for each affected municipality or a detailed reference as to where this information may be found on file at a Commission-docketed proceeding.
16. Checklist Item No. 22.b. – The Valley Act 537 Plan, included as the Application’s Appendix A-22-b, is missing eleven exhibits identified on Page TOC-10. Please amend the Application’s Appendix A-22-b to include copies of these eleven exhibits.
17. Checklist Item No. 22.b. – The Connection Management Plan provided as Appendix I of the Valley Act 537 Plan is missing portions of the “Summary of Management Plan Goals for WWTP” Section due to an apparent scanning error. Please provide a complete copy of the Appendix I.
18. Checklist Item No. 22.e – The Application’s Appendix A-22-e included copies of letters addressed to the Chester County Planning Commission, East Fallowfield Township, the Sadsbury Township Planning Commission, the Valley Township Planning Commission and the West Caln Township Planning Commission requesting evidence that PAWC’s filing is consistent with affected municipality and county comprehensive plans. However, the Valley Township Planning Commission is the only entity that provided a response to these letters. Please provide evidence the filing is consistent with the affected municipality and county comprehensive plans.
19. Checklist Item No. 25 – The undated Sewage Conveyance Agreement between the City of Coatesville Authority and Valley Township (Sewage Conveyance Agreement), included in the Application’s Appendix A-25-a, is not executed. Please amend the Application’s Appendix A-25-a to include an executed copy of the Sewage Conveyance Agreement.

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

20. Checklist Item No. 25 - The Application's Appendix A-24-a, Schedule 4.13 – Assigned Contracts identifies eleven agreements to be assigned to PAWC-WD, whereas the Application's Appendices A-25-a and A-25-b only include three agreements to be assumed by PAWC-WD. Please amend the Application's Appendix A-25-a to provide copies of all municipal and affiliate contracts to be assumed by PAWC-WD as part of the acquisition and a list and annual dollar value of other contracts.

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