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March 5, 2021

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 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 Upper Pottsgrove Township’s assets, properties and rights related to its wastewater collection and conveyance system to 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 Upper Pottsgrove Township, Montgomery County and a portion of Douglass Township, Berks County, Pennsylvania - Docket No. A-2020-3021460, et al

Pennsylvania-American Water Company to Begin Providing Individualized Customer Notice

Dear Secretary Chiavetta:

In compliance with the Secretarial Letter issued in the above-referenced proceeding on February 23, 2021 and the *Final Supplemental Implementation Order* entered February 28, 2019 at Docket No. M-2016-2543193, this correspondence is to inform the Pennsylvania Public Utility Commission (“Commission”) that Pennsylvania-American Water Company (“PAWC”) will soon begin providing individualized customer notice of the proposed acquisition to all potentially affected customers.

Enclosed please find a copy of the customer notice that PAWC intends to be distributed to all PAWC water and wastewater customers as well as the customer notice to be distributed to all Upper Pottsgrove Township wastewater customers. The notice to PAWC customers will be

provided with their water and wastewater bills during a billing cycle beginning March 8, 2021. The billing envelope and/or email, for PAWC customers who receive their bills electronically, will disclose the following: "Contains Notice of Proposed Rate Base Addition." The notice to Upper Pottsgrove Township wastewater customers will be provided via direct mailing. The notices indicate a deadline to file protests or petitions to intervene of May 17, 2021, consistent with the Secretarial Letter dated February 24, 2021. Please note that the enclosed notices have been revised from the draft notices that were included as an appendix to the Application to reflect an increase in the number of Upper Pottsgrove wastewater customers since the Application was filed.

Consistent with the directive of the February 23, 2021 Secretarial Letter, PAWC will also publish notice of the application once a week for two consecutive weeks in a newspaper having general circulation in the area of the Upper Pottsgrove Township Wastewater System. Upon completion, PAWC will file a proof of publication with the Commission.

PAWC will file a verification at this docket when the required individualized customer notice process has been completed. At which time, PAWC respectfully asks that the Commission promptly accept the application for official filing purposes via Secretarial Letter and publish notice of the application in the *Pennsylvania Bulletin*.

Thank you for your attention to this matter. 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*)

NOTICE OF PROPOSED WASTEWATER ACQUISITION AND RATE BASE ADDITION (Docket No. A-2020-3021460)



Dear Customer:

On February 23, 2021, the Pennsylvania Public Utility Commission (“PUC”) conditionally accepted for filing the application of Pennsylvania-American Water Co. (“Pennsylvania-American”) for approval to acquire the Upper Pottsgrove (“Upper Pottsgrove”) wastewater system assets. Upper Pottsgrove serves approximately 1,509 customers in Montgomery and Berks Counties. Pennsylvania-American’s application also requests that the PUC authorize an addition of \$13.75 million to Pennsylvania-American’s rate base pursuant to 66 Pa. C.S. § 1329. A utility’s rate base is the value of property used by the utility to provide service to its customers and is one of many components used to establish customer rates.

This acquisition will not immediately, but may in the future, affect water and/or wastewater bills of Pennsylvania-American customers, including Upper Pottsgrove wastewater customers. Pennsylvania-American is not requesting a rate increase as part of the acquisition. Your current rates will not change as a result of this acquisition until the conclusion of Pennsylvania-American’s first base rate case, filed after closing on the acquisition, where Pennsylvania-American requests and receives PUC approval to increase its rates. Based on a non-binding estimate of the potential rate impacts, Pennsylvania-American anticipates that the potential rate impact could be as follows:

PENNSYLVANIA-AMERICAN WASTEWATER				
Rate Class	Average Usage	Average Monthly Bill at PAWC Zone 1 Current Rates	Average Monthly Bill at PAWC Zone 1 Current Rate Adjusted for Potential Impact of Acquisition	Potential Increase
Residential	3,630 gal/month	\$64.93	\$66.23	\$1.30 or 2.0%
Commercial	22,000 gal/month	\$280.22	\$285.82	\$5.60 or 2.0%
Industrial	476,000 gal/month	\$5,547.08	\$5,658.02	\$110.94 or 2.0%

PENNSYLVANIA-AMERICAN WATER				
Rate Class	Average Usage	Average Monthly Bill at PAWC Zone 1 Current Rates	Average Monthly Bill at PAWC Zone 1 Current Rate Adjusted for Potential Impact of Acquisition	Potential Increase
Residential	3,630 gal/month	\$60.85	\$60.91	\$0.06 or 0.1%
Commercial	22,000 gal/month	\$291.80	\$292.09	\$0.29 or 0.1%
Industrial	476,000 gal/month	\$4,530.44	\$4,534.97	\$4.53 or 0.1%

These amounts could change and will depend on how the PUC chooses to apportion any increase among different types of utility service, rate zones and classes of customers. For Pennsylvania-American customers in a rate zone other than Rate Zone 1, the potential rate impact could vary from the chart above.

PUC ROLE

The state agency that approves acquisitions and rates for regulated public utilities is the PUC. The PUC will review and investigate the proposed acquisition. After examining the evidence, the PUC may approve, modify or deny the acquisition and may approve, modify or deny the requested addition to rate base.

ACTIONS YOU CAN TAKE

You can support or challenge Pennsylvania-American’s request by:

1. Sending a letter to the PUC. You can tell the PUC why you support or object to the application in your letter. This information can be helpful when the PUC investigates the application. Send your letter to the Pennsylvania Public Utility Commission, Post Office Box 3265, Harrisburg, PA 17105-3265.

2. Attending or presenting testimony at a PUC public input hearing. You can attend or be a witness at a PUC public input hearing. The PUC holds public input hearings if it opens an investigation of Pennsylvania-American’s transaction and if there is enough interest in the case. At these hearings, you can present your views in person to the PUC judge and to company

representatives. Testimony under oath becomes part of the application case record. The PUC holds these hearings in the service area of the company. For more information, call the PUC at 1-800-692-7380.

3. Filing a protest or a petition to intervene. If you want to be a party to the case, you must file a protest or a petition to intervene. You then have an opportunity to take part in all the hearings about the proposed acquisition. You can receive copies of all materials distributed by the other parties. Protests and petitions to intervene must be filed in accordance with 52 Pa. Code (relating to public utilities) on or before May 17, 2021. Filings must be made with the Secretary of the Pennsylvania Public Utility Commission at P.O. Box 3265, Harrisburg, PA 17105-3265, with a copy served on Pennsylvania-American’s counsel at:

David P. Zambito, Esq., Cozen O’Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101

The documents filed in support of the application are available on the PUC’s website at www.puc.pa.gov, and for inspection and copying at the Office of the Secretary of the PUC between 8 a.m. and 4:30 p.m., Monday through Friday, and at Pennsylvania-American’s offices at 852 Wesley Drive, Mechanicsburg, PA 17055. Inspection times may vary based on the COVID-19 state of emergency. The PUC docket number is A-2020-3021460. For more information, you may contact the PUC’s Bureau of Consumer Services at 1-800-692-7380.

NOTICE OF PROPOSED WASTEWATER ACQUISITION AND RATE BASE ADDITION (Docket No. A-2020-3021460)



Dear Upper Pottsgrove Customer:

On February 23, 2021, the Pennsylvania Public Utility Commission (“PUC”) conditionally accepted for filing the application of Pennsylvania-American Water Co. (“Pennsylvania-American”) for approval to acquire the Upper Pottsgrove (“Upper Pottsgrove”) wastewater system assets. Upper Pottsgrove serves approximately 1,509 customers in Montgomery and Berks Counties. Pennsylvania-American’s application also requests that the PUC authorize an addition of \$13.75 million to Pennsylvania-American’s rate base pursuant to 66 Pa. C.S. § 1329. A utility’s rate base is the value of property used by the utility to provide service to its customers and is one of many components used to establish customer rates.

This acquisition will not immediately, but may in the future, affect water and/or wastewater bills of Pennsylvania-American customers, including the Upper Pottsgrove wastewater customers. Pennsylvania-American is not requesting a rate increase as part of the acquisition. Your current wastewater rates will not change until the conclusion of Pennsylvania-American’s first base rate case, filed after closing on the acquisition, where Pennsylvania-American requests and receives PUC approval to increase its rates. Based on a non-binding estimate of the potential rate impacts, Pennsylvania-American anticipates that the potential wastewater rate impact could be as follows:

WASTEWATER				
Rate Class	Average Usage	Average Monthly Bill at Upper Pottsgrove Rates at Closing	Potential Average Monthly Bill	Potential Increase
Residential	3,630 gal/month	\$65.00	\$92.37	\$27.37 or 42.1%
Commercial	22,000 gal/month	\$65.00	\$92.37	\$27.37 or 42.1%
Industrial	476,000 gal/month	\$65.00	\$92.37	\$27.37 or 42.1%

These amounts could change and will depend on how the PUC chooses to apportion any increase among different types of utility service, rate zones and classes of customers and the period of time over which such rate increases could occur.

PUC ROLE

The state agency that approves acquisitions and rates for regulated public utilities is the PUC. The PUC will review and investigate the proposed acquisition. After examining the evidence, the PUC may approve, modify or deny the acquisition and may approve, modify or deny the requested addition to rate base.

ACTIONS YOU CAN TAKE

You can support or challenge Pennsylvania-American’s request by:

- 1. Sending a letter to the PUC.** You can tell the PUC why you support or object to the application in your letter. This information can be helpful when the PUC investigates the application. Send your letter to the Pennsylvania Public Utility Commission, Post Office Box 3265, Harrisburg, PA 17105-3265.
- 2. Attending or presenting testimony at a PUC public input hearing.** You can attend or be a witness at a PUC public input hearing. The PUC holds public input hearings if it opens an investigation of Pennsylvania-American’s transaction and if there is enough interest in the case. At these hearings, you can present your views in person to the PUC judge and to company representatives. Testimony under oath becomes part of the application case record. The PUC holds these hearings in the service area of the company. For more information, call the PUC at 1-800-692-7380.

- 3. Filing a protest or a petition to intervene.** If you want to be a party to the case, you must file a protest or a petition to intervene. You then have an opportunity to take part in all the hearings about the proposed acquisition. You can receive copies of all materials distributed by the other parties. Protests and petitions to intervene must be filed in accordance with 52 Pa. Code (relating to public utilities) on or before May 17, 2021. Filings must be made with the Secretary of the Pennsylvania Public Utility Commission at P.O. Box 3265, Harrisburg, PA 17105-3265, with a copy served on Pennsylvania-American’s counsel at:

David P. Zambito, Esq.
Cozen O’Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101

The documents filed in support of the application are available on the PUC’s website at www.puc.pa.gov, and for inspection and copying at the Office of the Secretary of the PUC between 8 a.m. and 4:30 p.m., Monday through Friday, and at Pennsylvania-American’s offices at 852 Wesley Drive, Mechanicsburg, PA 17055. Inspection times may vary based on the COVID-19 state of emergency. The PUC docket number is A-2020-3021460. For more information, you may contact the PUC’s Bureau of Consumer Services at 1-800-692-7380.

**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 Upper Pottsgrove’s assets, properties and :
rights related to its wastewater collection and conveyance system : Docket No. A-2020-3021460
to 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 Upper Pottsgrove :
Township, Montgomery County and a portion of Douglass :
Township, Berks County. :

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

Petition of Pennsylvania-American Water Company, related to its :
acquisition of the Upper Pottsgrove Township wastewater :
collection system, for approval under Section 1329 of the :
Pennsylvania Public Utility Code, 66 Pa. C.S. § 1329, to (i) collect :
a distribution system improvement charge, (ii) for book and : Docket No. P-2020-_____
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 :
Section 507 of the Pennsylvania Public Utility Code, 66 Pa. C.S. : Docket No U-2020-_____
§ 507, of (a) the Asset Purchase Agreement Between :
Pennsylvania-American Water Company and Upper Pottsgrove :
Township; (b) the Sewage Treatment Agreement between Upper :
Pottsgrove Township, Borough of Pottsgrove and Pottstown :
Borough Authority and (c) Joint Sewage Transportation :
Agreement between Upper Pottsgrove Township and Lower :
Pottsgrove Township :

CERTIFICATE OF SERVICE

I hereby certify that I have this 5th day of March 2021 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

Erin Fure, Esquire
Office of Small Business Advocate
555 Walnut Street
Forum Place, First Floor
Harrisburg, PA 17101-1923

Christine Hoover, Senior Consumer Advocate
Erin L. Gannon, Esquire
Harrison W. Breitman, Esquire
Santo G. Spataro, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, Fifth Floor
Harrisburg, PA 17101-1923

Gina Miller, Prosecutor
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
400 North Street, F West
Harrisburg, PA 17120

Respectfully submitted,



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