



Thomas J. Sniscak
(717) 236-1300 x224
tjsniscak@hmslegal.com

Whitney E. Snyder
(717) 236-1300 x260
wesnyder@hmslegal.com

Bryce R. Beard
(717) 236-1300 x248
brbeard@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

June 25, 2021

By Electronic Filing

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – Second Floor North
Harrisburg, PA 17120

RE: Audubon Water Company; Docket No. R-2020-3020919; **AUDUBON WATER COMPANY'S RESPONSES TO BTUS DIRECTED QUESTIONS SET I**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission are Audubon Water Company's responses to BTUS Directed Questions, Set I, in the above-captioned matter.

For questions that requested excel format responses, those responses will be provided separately via email per the certificate of service. Portions of the responses contain CONFIDENTIAL SECURITY INFORMATION which will be mailed via flash drive to the Secretary separately.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (717) 236-1300.

Very truly yours,

/s/ Whitney E. Snyder

Thomas J. Sniscak
Whitney E. Snyder
Bryce R. Beard
Counsel for Audubon Water Company

WES/das

Enclosures

cc: Matthew Lamb, BTUS (via email only mlamb@pa.gov)
Per Certificate of Service

**MONITORING & REPORTING REQUIREMENTS FOR AUDUBON WATER
COMPANY AT DOCKET NO. R-2020-3020919**

Audubon Water Company's Responses to BTUS Directed Questions Set I

SYSTEM MAP

- (1) By July 1, 2021, please provide a map depicting the location of the Audubon Water Company's (Audubon's) water service facilities, including: (a) All isolation valves delineated by the company's numbering system; (b) Planned pressure monitoring points including the associated elevations and a unique identifier which will correlate to all field test logs; (c) All system fire hydrants delineated by the company's numbering system and its designation as either public or private; (d) The location and elevation of all water system facilities such as wells, water treatment plant, pumping stations, and storage tanks; and (e) The boundaries of Audubon's certificated service territory.

RESPONSE: Audubon objects to the questions as it requests a single map containing all of the information which Audubon does not currently possess and would be required to create in response to this question.

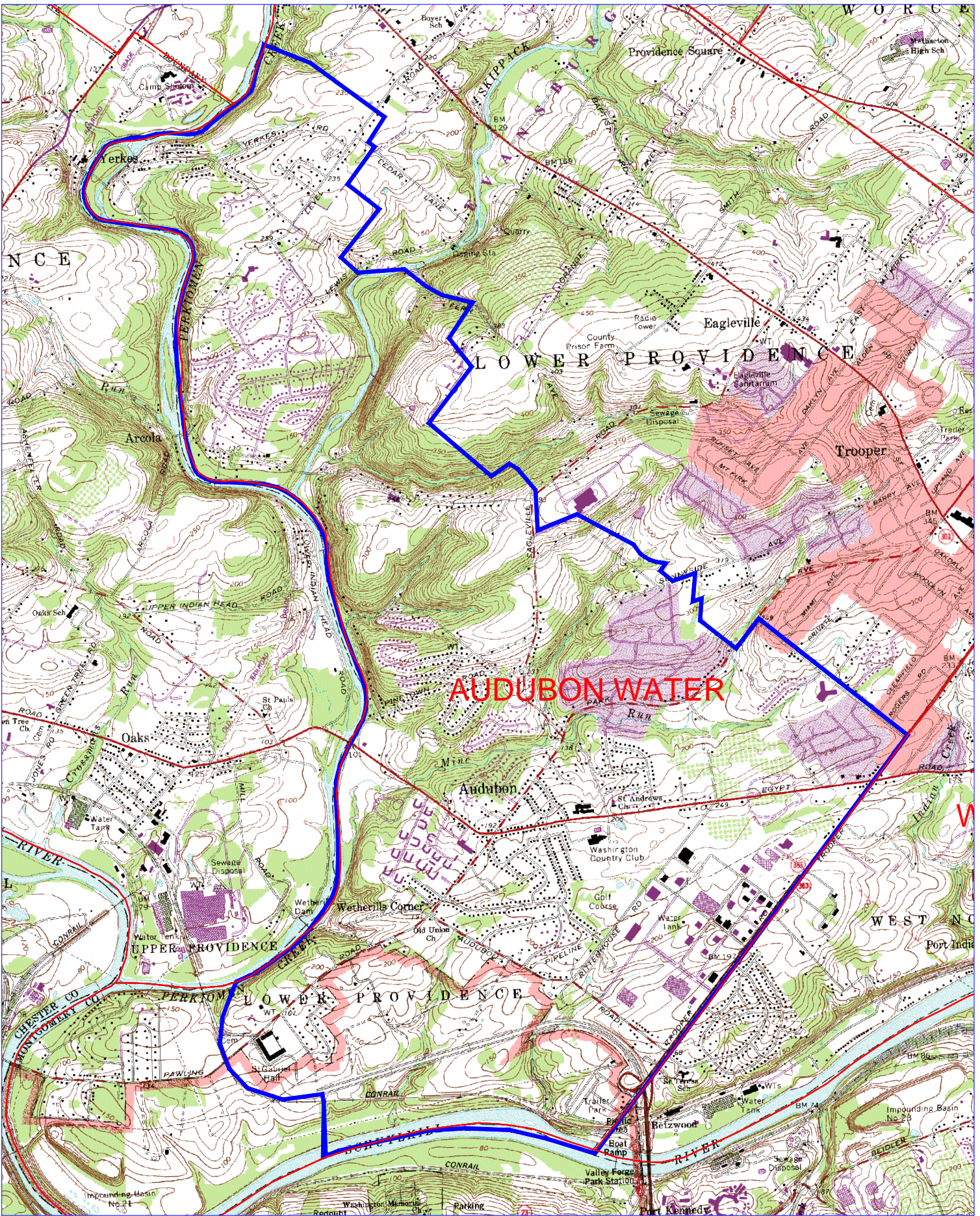
Without waiver of objection, Audubon is currently in the process of creating a digitized system wide map containing most of the requested items with an outside consultant. The process includes the digitizing and compiling of Audubon's records to modernize its system mapping. Audubon will provide the updated system map once it is completed. At this time, Audubon cannot currently guarantee a specific date for completion.

Subject to and without waiver of the above objection, Audubon is providing the following versions of various mapping parameters individually:

- (a) Audubon does not currently possess digital maps with valves identified by the labeling descriptors provided below in response to No. 2. Audubon has physical maps and cut sheets labeling valve locations as markers on water mains. Audubon is working to digitize its system mapping as described above and will provide once completed.
- (b) See **Confidential Security Information** files "b. CONFIDENTIAL SECURITY INFORMATION Audubon-LPT-Pressure Zone Map" and "b. CONFIDENTIAL SECURITY INFORMATION USGS_MAP"
- (c) See **Confidential Security Information** files "c. CONFIDENTIAL SECURITY INFORMATION Audubon Valley Forge Corp Center 2009" and "c. CONFIDENTIAL SECURITY INFORMATION Audubon-LPT-Map2014-800 Scale Map"
- (d) See **Confidential Security Information** files "d. CONFIDENTIAL SECURITY INFORMATION Audubon Water Pipes_Facilities"
- (e) See "e. Audubon Franchise Area"

PROVIDED BY: JH Russell, Manager

DATE: June 25, 2021



AUDUBON WATER FRANCHISE AREA

**MONITORING & REPORTING REQUIREMENTS FOR AUDUBON WATER
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ISOLATION VALVE TESTING

- (2) By July 1, 2021, please provide a list of all isolation valves, by unique identifier, and indicate the last date each valve was exercised or attempted to be exercised in an Excel format.

RESPONSE: Audubon objects to the request to identify the last date each valve was exercised to the extent it pre-dated the Commission-approved Settlement in R-2020-3020919. Per the settlement paragraph No. 23, Audubon is required to maintain a log going forward of all isolation valve exercising and data, and will submit such data per the terms of the Commission approved settlement.

See attached list "No. 2 - AWC VALVE SPREAD SHEET REDACTED". Audubon has redacted the Confidential Security Information valve location descriptors. See also Audubon's valve operation worksheet identifying valve exercising which has occurred in April 2021, "No. 2 - AWC Valve Operation WorksheetMASTER April."

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SYSTEM PRESSURE SURVEY PROGRAM

- (3) Please indicate if Audubon utilizes and maintains a computerized hydraulic model of its water system and, if so, identify the name and version of the modeling software it utilizes.

RESPONSE: Audubon does not utilize or maintain a computerized hydraulic model of its water system.

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- (4) If Audubon maintains a hydraulic model, please provide a copy of the inputs and outputs from the hydraulic network analysis of the Audubon water system, in both a graphical and numerical format to include all elements and attributes, depicting, at a minimum, the following operational conditions:
- (a) The peak hour demand;
 - (b) The maximum daily demand plus fire flow and state the fire flow assumptions;
 - (c) The minimum daily demand; and
 - (d) Any other operational conditions the company believes reflect service pressure constraints.

RESPONSE: Not applicable.

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- (5) If Audubon does not maintain a hydraulic model, please explain how Audubon manages a complete understanding of its water system's pressure and flow behaviors for each of the operational conditions stated in Question No. 4 and provide a working electronic copy of the data from SCADA systems and/or field measurements supporting Audubon's explanation in an Excel format.

RESPONSE: Audubon has operators with years of experience on its system. Audubon takes daily field measurements at all facilities and records them manually. The manual records are transferred into excel format at regular intervals.

Audubon does not have a SCADA system. Audubon's manual process is sufficient for managing system requirements within its territory, especially considering that Audubon's system demands are unlikely to substantially change due to the characteristics of Audubon's developed service territory.

See attached pressure records in excel format which contains Jan, Feb, April, and May 2021 daily monitoring. Audubon is working on the transfer from manual to digital excel records for March 2021 and will provide once complete.

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- (6) Please prepare a detailed pressure survey program which, at a minimum, specifies the company's monitoring approach; lists all planned pressure monitoring points along with a unique identifier, location, elevation, pipe size and material type, and pressure zone; and states how the company plans to use the information gathered in the survey to increase service pressure reliability.

RESPONSE: On a daily basis, Audubon personnel record pressures from active facilities throughout the water system. All recordings are from high points in the individual pressure zones of the system except for Falcon and Featherbed where pressures are taken at the pump stations and at VFCC #2 where pressures are recorded on the main gravity grid at the base of the water tower. As all these points represent small pressure areas, they accurately depict the grid they represent.

Also, there are four continuous monitoring locations throughout the system. They all have individual set points and parameters to alert operations in the station is offline or a pressure is out of a preset range. This allows Audubon Operations to respond prior to any individual pressure being less than Audubon Operations normal operating range.

This information will allow and has allowed Audubon to identify areas of Water Main looping and increased facilities redundancy to increase service pressure regularity.

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- (7) By July 1, 2021, and by December 31, 2021 thereafter, please provide a pressure survey log report of all system pressure readings completed by Audubon to include, at a minimum, those points at the highest and lowest ground elevations during periods near maximum and minimum usage for the period commencing January 1, 2021. Reports should be completed in an Excel format.

RESPONSE: Audubon collects daily pressure logs and has provided those in response to Question No. 5 above.

Audubon's daily testing typically occurs during peak morning usage with additional readings during late afternoon just before peak. See response to Question No. 6 above as if set forth in full.

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**MONITORING & REPORTING REQUIREMENTS FOR AUDUBON WATER
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FIRE HYDRANT REPLACEMENT PROGRAM

- (8) Please provide a list of all system fire hydrants by location, unique identifier, design fire flow rate, design rating pressure, and public/private designation in an Excel format and denote those hydrants identified by Lower Providence Township and its fire marshal as high importance.

RESPONSE: Audubon does not maintain records of each hydrant flow rate and pressure rating and relies on manufacturer specifications.

See attachment with location, identifiers, and designation titled "No. 8 – FIRE HYDRANTS".

For fire hydrants actively coordinated with Lower Providence Township and additional details, see response to No. 12 below.

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- (9) By July 1, 2021, please provide a copy of the fire hydrant test results for the flow tests conducted on the hydrants of concern identified by Lower Providence Township's Fire Marshal and for any other fire hydrant tests conducted during this period. Identify the test date, test time, hydrant location, unique identifier, elevation, nozzle diameter, nozzle coefficient, static pressure, residual pressure, fire flow rate, rating pressure, and pass/deficient status tabulated in an Excel format. If any additional fire hydrant tests are conducted after July 1, 2021, please provide the same information for such hydrants by December 31, 2021.

RESPONSE: Audubon is actively coordinating with Lower Providence Township for flow testing to occur during Audubon's fall hydrant flushing program to incorporate for flow test monitoring. Audubon visually confirmed adequate flows for its hydrants during its spring flushing. Audubon does not flush hydrants during summer months or conduct flow testing due to water use restrictions in the region.

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- (10) Please quantify and explain the basis of the fire flow rate that Audubon has determined to be deficient for fire hydrants.

RESPONSE: Audubon generally considers approximately 500gpm adequate. In circumstances where additional flow is required, Audubon adjusts its standard appropriately to reasonably accommodate the required flow rate.

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- (11) Please identify any industry-recognized codes, standards and practices that Audubon follows regarding fire hydrant service, testing and maintenance.

RESPONSE: Audubon relies on manufacturers operations and maintenance instructions as a guide to servicing, testing, and maintaining hydrants. Each manufacturer has an instruction manual on proper maintenance and practices for their hydrants. Audubon keeps copies of its hydrant's manuals on site for services, testing, and maintenance purposes.

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- (12) Based upon Audubon's review of the Lower Providence Township's Fire Marshal hydrant flow tests and the results of the fire hydrant tests conducted by Audubon, please prepare a fire hydrant remediation plan detailing the company's planned to remediate or replace fire hydrants found to provide a deficient level of service that includes a schedule for the expected start and completion date of each plan item by December 31, 2021.

RESPONSE: Audubon has already completed one hydrant replacement in coordination with the LPT fire marshal. The hydrant, Audubon Square #4 hotel, was replaced in April 2021. Audubon coordinated with LPT's fire marshall to confirm the need for and completion of the hydrant replacement.

Additionally, through coordination with Audubon, LPT's Fire Marshall suggested that Hydrant #12 at the corner of Ringneck and Morning dove be a target for replacement. Audubon has investigated to determine the process and costs for replacement and is scheduling the replacement to occur in September.

Audubon has identified the following hydrants which it will coordinate replacement with the LPT fire marshal, including 935 Jefferson, Egypt Rd. next to storage yard, 3640 Worthington to be determined during fall flushing operations, and Stoughton and Dorchester to be determined during fall flushing.

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VERIFICATION

I, JH Russell, Manager on behalf of Audubon Water Company, hereby state that the facts set forth in the foregoing document 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 in this matter. This verification is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.


JH Russell, Manager
Audubon Water Company

Dated: June 25, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the forgoing document upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party). This document has been filed electronically on the Commission's electronic filing system and served via electronic mail only on the following:

VIA ELECTRONIC MAIL ONLY

Christine Maloni Hoover, Esq.
Office of Consumer Advocate
555 Walnut Street
5th Floor Forum Place
Harrisburg, PA 17101
choover@paoca.org

Teresa Wagner, Esq.
Office of Small Business Advocate
555 Walnut Street
1st Floor Forum Place
Harrisburg, PA 17101
tereswagne@pa.gov

Richard Kanaskie, Esq.
Bureau of Investigation & Enforcement
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
P.O. Box 3265
Harrisburg, PA 17105-3265
rkanaskie@pa.gov

/s/ Whitney E. Snyder

Thomas J. Sniscak, Esq.
Whitney E. Snyder, Esq.
Bryce R. Beard, Esq.

Dated: June 25, 2021