July 1, 2021

Rosemary Chiavetta

Secretary, PA Public Utility Commission

400 North Street

Harrisburg, PA 17120

**Re: Application of Pennsylvania-American Water Company Pursuant to Sections 507, 1102, and 1329 of the Public Utility Code for Approval of its Acquisition of the** **Valley Township Water Treatment and Distribution System and Valley Township Wastewater Collection and Conveyance System; Docket Nos. A-2020-3019859, A-2020-3020178**

Dear Secretary Chiavetta,

Pursuant to Section 106 of the Procedures Manual of the Pennsylvania Public Utility Commission, I request that you inform the appropriate parties of the following issues that I wish the parties to examine in the above-referenced docket.

1. The estimated number of company-owned lead service lines and the number of customer-owned lead service lines in the Valley Township water distribution system (VTWDS);
2. PAWC’s efforts to include VTWDS in its Act 120 of 2018, 66 Pa. C.S. § 1311(b)(2), customer-owned lead service line replacements;
3. PAWC’s efforts to include VTWDS in its tariff cross-connection control requirements regarding 25 Pa. Code §§ 109.709, 109.609 and any applicable provisions of the International Plumbing Code;
4. Compliance materials of PAWC’s efforts to include VTWDS in its operation and maintenance plans required by 25 Pa. Code §109.702 as they relate to adequate, safe, and reasonable service for utility customers and employees;
5. The number of VTWDS commercial meters in the system, the number tested, and the number passed or failed for year 2020;
6. The number of VTWDS valves exercised in calendar year 2020 and the frequency of valve maintenance;
7. The number of VTWDS commercial and industrial customers that have testable backflow prevention devices and the number of devices that were tested for calendar year 2020;
8. The integration of VTWDS into PAWC tariff backflow prevention requirements regarding residential fire protection and irrigation and whether PAWC has a plan for inspection and testing of fire hydrants;
9. Whether PAWC has surveyed the number of VTWDS fire hydrants that do not provide a minimum flow of 500 pgm at 20 psig;
10. Whether PAWC has determined if VTWDS residential customers have American Society of Sanitary Engineers 1024 backflow assemblies installed at meter locations; and
11. Whether PAWC has evaluated the VTWDS lost and unaccounted water performance since 2018 and any relevant results.

Thank you for your attention to this matter. Please contact Shaun Sparks of my office at 717-787-3464 or [shsparks@pa.gov](mailto:shsparks@pa.gov) should you have any questions regarding my request.