



100 Pine Street • PO Box 1166 • Harrisburg, PA 17108-1166
Tel: 717.232.8000 • Fax: 717.237.5300

Teresa Harrold
Direct Dial: 717.237.5246
tharrold@mcneeslaw.com

August 19, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**RE: Joint Application of Veolia Environnement S.A., Veolia North America, Inc., SUEZ S.A., SUEZ Water Pennsylvania Inc. and SUEZ Water Bethel Inc. for all approvals pursuant to Sections 1102(a)(3), (4), and 1103 of the Pennsylvania Public Utility Code, and as otherwise required under the Pennsylvania Public Utility Code for the change in control of SUEZ Water Pennsylvania Inc. and SUEZ Water Bethel Inc.;
Docket No. A-2021-3026523**

Dear Secretary Chiavetta:


Attached please find the Supplemental Direct Testimony of John D. Hollenbach addressing the directed questions from Commissioner Ralph Yanora's July 13, 2021, Secretarial Letter.

As shown by the attached Certificate of Service and per the Commission's March 20, 2020, Emergency Order, all parties to this proceeding are being duly served via email only due to the current COVID-19 pandemic. We are also filing these documents electronically. Upon lifting of the aforementioned Emergency Order, we can provide parties with a hard copy of this pleading upon request.

If you have any questions regarding the attached documents, please contact the undersigned.

Sincerely,

McNEES WALLACE & NURICK LLC

By 
Teresa Harrold

Counsel to Veolia Environnement S.A.
and Veolia North America, Inc.

Enclosure

c: Shaun Sparks (shsparks@pa.gov)
Certificate of Service

www.McNeesLaw.com

HARRISBURG, PA • LANCASTER, PA • SCRANTON, PA • STATE COLLEGE, PA • YORK, PA • COLUMBUS, OH • FREDERICK, MD • WASHINGTON, DC

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving a true copy of the foregoing document upon the participants listed below in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA E-MAIL

David P. Zambito, Esq.
Jonathan Nas, Esq.
Cozen O'Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101
dzambito@cozen.com
jnase@cozen.com

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

Teresa Reed Wagner, Executive Director
Erin Fure, Esq.
Office of Small Business Advocate
Forum Place
555 Walnut St., 1st Floor
Harrisburg, PA 17101
tereswagne@pa.gov
efure@pa.gov

John W. Sweet, Esq.
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
PULP@pautilitylawproject.org
Counsel for CAUSE-PA



Teresa Harrold

Counsel to Veolia Environnement S.A. and
Veolia North America, Inc.

Dated this 19th day of August, 2021, in Harrisburg, Pennsylvania

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Veolia Environnement S.A., :
Veolia North America, Inc., SUEZ S.A., SUEZ :
Water Pennsylvania Inc. and SUEZ Water Bethel :
Inc. for all approvals pursuant to Sections : Docket No. A-2021-3026523
1102(a)(3), (4), and 1103 of the Pennsylvania :
Public Utility Code, and as otherwise required :
under the Pennsylvania Public Utility Code for the :
change in control of SUEZ Water Pennsylvania :
Inc. and SUEZ Water Bethel Inc. :

SUPPLEMENTAL DIRECT TESTIMONY

AND EXHIBITS

OF

JOHN D. HOLLENBACH

ADDRESSING COMMISSIONER YANORA'S JULY 13, 2021, LETTER

August 19, 2021

SUPPLEMENTAL DIRECT TESTIMONY OF JOHN D. HOLLENBACH

1 **Q. Please state your name and business address.**

2 A. John D. Hollenbach, 6310 Allentown Boulevard, Harrisburg PA 17112.

3 **Q. Did you submit testimony previously in this proceeding?**

4 A. Yes. I submitted Direct Testimony included with the case filing as Joint Applicants
5 Statement No. 2 dated June 11, 2021.

6 **Q. What is the purpose of your supplemental direct testimony?**

7 A. The purpose of this supplemental direct testimony is to address eleven questions raised by
8 Commissioner Ralph V. Yanora, under the cover of the July 13, 2021 Secretarial Letter,
9 which is attached as Exhibit JDH-2.

10 **Q. How will you distinguish your answers for SUEZ Water Pennsylvania Inc. and SUEZ
11 Water Bethel Inc.?**

12 A. When answering for SUEZ Water Pennsylvania Inc. the acronym SWPA will be used, and
13 when referring to SUEZ Water Bethel Inc. the acronym SWBE will be used. When the
14 answer is the same for both entities “Company” will be used.

15 **Q. Question No. 1 in Commissioner’s Yanora’s letter asks for the estimated number of
16 company-owned lead service lines and the number of customer-owned lead service
17 lines in the SUEZ system.**

18 A. The Company is in the process of updating its service inventory to comply with the
19 Environmental Protection Agency’s proposed Lead and Copper Rule. The Company has
20 no known lead service lines in any of its systems, either on the Company’s side or the
21 customers’ side. Based upon the age of SWPA’s systems, however, there may be a minimal

1 number of Company-side services that have a lead gooseneck, typically on a galvanized
2 service. In the rare cases when SWPA encounters a lead gooseneck, SWPA will replace
3 both the lead gooseneck and the galvanized service.

4 **Q. Question No. 2 in Commissioner’s Yanora’s letter asks for SUEZ’s plans to file a**
5 **new tariff or tariff supplement in compliance with Act 120 of 2018, 66 Pa. C.S.**
6 **§ 1311(b)(2), regarding customer-owned lead service line replacements.**

7 A. Due to the fact that the Company does not have any known lead service lines, the Company
8 has not filed a new tariff. At such time as the inventory required by the Lead and Copper
9 Rule is completed, if there is a need to file a new tariff, the Company will do so.

10 **Q. Question No. 3 in Commissioner’s Yanora’s letter asks for the compliance of the**
11 **SUEZ tariff cross-connection control requirements with 25 Pa. Code §§ 109.709,**
12 **109.609 and any applicable provisions of the International Plumbing Code.**

13 A. The Company believes Section 109.609, which addresses storage requirements, was
14 inadvertently referenced instead of Section 109.608, which prohibits designing or
15 constructing a public water system in a manner that creates a cross-connection. The
16 Company’s tariff and design specifications ensure compliance with Section 109.608.

17 25 Pa. Code § 109.709 places the obligation for eliminating any potential cross connections
18 on the customer. Section 109.709(a) outlines the customer’s responsibility:

19 (a) No person may introduce contaminants into a public water supply
20 through a service connection of a public water system.

21 (1) It shall be the responsibility of the customer to eliminate
22 cross-connections or provide backflow devices to prevent
23 contamination of the distribution system from both backsiphonage
24 and backpressure. Individual backflow preventors shall be
25 acceptable to the public water supplier.

1 (2) If the customer fails to comply with paragraph (1) within a
2 reasonable period of time, the water supplier shall discontinue
3 service after reasonable notice has been made to the customer.

4 Section 109.709(b) outlines the Company's responsibility:

5 (b) At the direction of the Department, the public water supplier shall
6 develop and implement a comprehensive control program for the
7 elimination of existing cross-connections or the effective
8 containment of sources of contaminations, and prevention of future
9 cross-connections. A description of the program, including the
10 following information, shall be submitted to the Department for
11 approval:

12 (1) A description of the methods and procedures to be used.

13 (2) An implementation schedule for the program.

14 (3) Legal authority for implementation of the program, such as,
15 by ordinance or rules.

16 (4) A time schedule for inspection of nonresidential customers'
17 premises for cross-connections with appropriate recordkeeping.

18 (5) A public education program for residential customers.

19 (6) A description of the methods and devices which will be used
20 to protect the water system.

21 (7) A program for the review of plans for new users to assure
22 that no new cross-connections are developed.

23 (8) Provisions for discontinuance of water service, after
24 reasonable notice, to premises where cross-connections exist.

25 The Company has taken the following steps to comply with Section 109.709(b).

- 26 • SWPA's tariff and SBE's tariff require the proper backflow device be installed for
27 all new services. SWPA's Fifth Revised Tariff Page 43, part 22 and Page 44, part
28 23; SBE's Original Tariff Page 38, paragraph 9 and Page 40, paragraphs 18 and
29 18A.
- 30 • The Company's specifications require the proper backflow device is installed for
31 all new services.
- 32 • The Company annually inspects its water and wastewater treatment plants, wells,
33 booster and other facilities' backflow devices.
- 34 • The Company annually inspects customers' backflow devices via an outside
35 contractor.

36 The Company's response to the Commissioner's question #7 provides more detail and data
37 on testable backflow prevention devices.

1 **Q. Question No. 4 in Commissioner’s Yanora’s letter asks for the compliance materials**
2 **of SUEZ’s operation and maintenance plans required by 25 Pa. Code § 109.702 as they**
3 **relate to adequate, safe, and reasonable service for utility customers and employees.**

4 **A.** The Company has implemented the following to ensure its compliance with 25 Pa. Code
5 §109.702.

- 6 • The Company has deployed Enterprise Management Planning to track and manage
7 its assets. The Company utilizes software from INFOR (a multi-national enterprise
8 software company) to manage its vertical assets and uses KloudGin (a cloud-based
9 provider of field service and asset management solutions) to manage its linear
10 assets.
- 11 • The Company’s Emergency Response Plan is updated annually.
- 12 • The Company has a robust cyber security plan, which also includes monthly
13 training for all its employees.
- 14 • The Company has several Standard Operating Procedures to ensure compliance
15 with 25 Pa. Code § 109.702.
- 16 • The Company requires its employees to participate in safety and environmental
17 training.
- 18 • The Company has deployed SAMS Water, which is a system that ensures
19 compliance with federal and state drinking water quality regulations. It is a
20 scheduling, monitoring and analysis software for water quality compliance
21 management.
- 22 • The Company utilizes a reverse calling system called Notify to provide its
23 customers with emergency notifications.
- 24 • The Company has a Commission-approved five year Long Term Infrastructure
25 Investment Plan (“LTIIIP”).
- 26 • The Company has installed auxiliary power at all of its major water supply
27 facilities.

1 **Q. Question No. 5 in Commissioner’s Yanora’s letter requests the number of SUEZ’s**
2 **commercial meters in the system, the number tested, and the number passed or failed**
3 **for year 2020.**

4 A. SWPA has 5,776 commercial, industrial and Public Authority meters and during 2020
5 replaced 45 of the 184 commercial meters in its system that are 3” and larger, and replaced
6 446 commercial meters in its system that are 2” and smaller.

7 SWPA Customer Classification by Meter Size:

Size	Commercial	Industrial	Public Authority
0058	2894	21	113
0075	67		1
0100	1169	15	44
0150	553	5	30
0200	540	10	71
0300	30	7	15
0400	61	3	6
0600	64	3	12
0800	31	2	3
1000	5	1	
Grand Total	5414	67	295

8
9 SWBE has 86 commercial, industrial and Public Authority meters and replaced 3 two-inch
10 meters in 2020.

11 SWBE Customer Classification by Meter Size:

Size	Commercial	Industrial	Public Authority
0058	46	2	1
0075			
0100	10		
0150	13		
0200	15		
Grand Total	84	2	1

12

1 **Q. Question No. 6 in Commissioner’s Yanora’s letter asks for the number of SUEZ’s**
2 **valves exercised in calendar year 2020 and the frequency of valve maintenance.**

3 A. SWPA has over 13,000 valves in its distribution system and, in 2020, it exercised 3,042.
4 SWPA’s valve maintenance program is to inspect and exercise each valve on a 5-year
5 cycle. SWBE has 424 valves in its distribution system and exercises them on a five-year
6 cycle. In 2020, none of the 424 SWBE valves were scheduled to be exercised.

7 **Q. Question No. 7 in Commissioner’s Yanora’s letter asks for the number of SUEZ’s**
8 **commercial and industrial customers that have testable backflow prevention devices**
9 **and the number of devices that were tested for calendar year 2020.**

10 A. SWPA does not have information on whether all 5,776 commercial, industrial and Public
11 Authority customers have a testable backflow prevention device. However, all 243
12 customers that have a meter 3” or larger are equipped with a testable backflow prevention
13 device. In 2018 and 2019, SWPA inspected 600 commercial/industrial customers’
14 backflow prevention devices. Due to health and safety measures implemented to curb the
15 spread of COVID-19, no inspections were performed in 2020 for either SWPA or SWBE.

16 **Q. Question No. 8 in Commissioner’s Yanora’s letter asks about SUEZ’s tariff backflow**
17 **prevention requirements regarding residential fire protection and irrigation and**
18 **whether SUEZ has a plan for inspection and testing of fire hydrants.**

19 A. All new Company services, including residential, fire, and irrigation, require backflow
20 preventers. Backflow preventers are specified and included in the design of all Company-
21 approved meter pits and meter vaults. The Fifth Revised Tariff Page 43, part 22 and Third
22 Revised Page 44, parts 22-23, specifically address backflow prevention in SWPA’s tariff:

23 22. An appropriately specified and sized backflow preventor, as
24 approved by the American Water Works Association, will be

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32
33
34
35
36
37
38
39
40
41
42
43

installed at the customer's expense on the discharge side of the meter at a point prior to the installation of any branch piping to prevent the backflow of water into the Company's meter. The type of backflow preventor will be determined by the Company and will be based on the customer's usage hazard classification.

In the case of meters two (2") inches and larger, the customer shall provide suitable piping and valves to by-pass the meter in order to provide uninterrupted service during testing and/or changing of the meter. All bypasses shall be fitted with a lockable control valve to prevent unauthorized and unmetered water use during normal periods of service. In the case of an unmetered fire sprinkler system, a double check valve backflow with a detector check shall be installed.

Backflow preventors shall be required for all new services and when feasible for replacement services.

- 23. A control valve shall be placed by the Customer on the service line on the inlet and outlet sides of the meter. When required, a suitable check valve should be placed by the Customer between the meter and the control valve on the outlet side of the meter. When a check valve, backflow prevention device or pressure reducing valve is installed, the Customer shall install a pressure relief valve and a thermal expansion tank (to be sized and designed by the Customer or his agent) at some convenient point on the house piping to relieve pressure fluctuations and/or excess pressure due to heating water. In accordance with the specifications of the Company, the Customer shall install a pressure reducing valve (PRV), to be set at a pressure not to exceed the applicable limits, as follows: 1) on the domestic service line when the pressure on the Company's distribution system exceeds 100 pounds per square inch (psi); 2) on the fire service line when the pressure exceeds 150 psi; or 3) when required in the discretion of the Company where it is believed that the pressure may exceed either limit. The Customer or his authorized agent shall check with the Company to determine whether a pressure reducing valve is required prior to finalizing the design of the internal plumbing system. In all cases, the pressure reducing valve must be installed at a location after the inlet control valve and before the meter, but in the case of the domestic service line an additional control valve must be installed between the PRV and the meter.

The Original Tariff Page 38, paragraph 9 and Page 40, paragraphs 18 and 18A address backflow prevention in SWBE's tariff:

- 1 9. No direct connection of pumping equipment for any purpose or
2 cross-connection with any other piping system will be allowed
3 unless approved in writing by the Company.
- 4 18. An appropriately specified and sized backflow preventer, as
5 approved by the American Water Works Association, will be
6 installed at the customer's expense on the discharge side of the meter
7 at a point prior to the installation of any branch piping to prevent the
8 backflow of water into the Company's meter. The type of backflow
9 preventer will be determined by the Company and will be based on
10 the customer's usage hazard classification.
- 11 18A. In the case of meters two (2") inches and larger, the customer shall
12 provide suitable piping and valves to by-pass the meter in order to
13 provide uninterrupted service during testing and/or changing of the
14 meter. All bypasses shall be fitted with a lockable control valve to
15 prevent unauthorized and unmetered water use during normal
16 periods of service. In the case of an unmetered fire sprinkler system,
17 a double check valve backflow with a detector check shall be
18 installed.

19 These tariff pages are attached to this testimony as Exhibit JDH-3.

20 As related to hydrants, SWPA has 3,669 hydrants in its distribution system and SWBE has
21 300 hydrants in its distribution system. The Company inspects its hydrants on an annual
22 basis. In 2020, despite the impact of COVID-19, SWPA tested 1,500 of its 3,669 hydrants
23 and SWBE tested each of its 300 hydrants.

24 **Q. Question No. 9 in Commissioner's Yanora's letter asks whether SUEZ has surveyed**
25 **the number of fire hydrants in its system that do not provide a minimum flow of 500**
26 **gallons per minute ("gpm") at 20 pounds/square inch ("psi").**

27 A. All of SWBE's hydrants have flows in excess of 500 gpm at 20 psi. Of SWPA's 3,669
28 hydrants, all have flows in excess of 500 gpm at 20 psi except for a portion of hydrants
29 that are on undersized mains. In SWPA, 85 hydrants are on undersized mains that limit
30 the flow to hydrants (*i.e.*, four-inch mains). Of those 85 hydrants, 24 had flows in excess
31 of 500 gpm at 20 psi. The remaining 61 hydrants had flows less than 500 gpm.

1 **Q. Question No. 10 in Commissioner’s Yanora’s letter asks whether SUEZ’s residential**
2 **customers have American Society of Sanitary Engineers 1024 backflow assemblies**
3 **installed at meter locations.**

4 A. SWPA’s tariff requires all new fire, residential, commercial, industrial, and/or irrigation
5 services install an approved backflow preventer. When feasible, backflow preventers are
6 required for replacement services. Third Revised Page 44, part 22.

7 SWBE’s tariff, Page 40, paragraph 18, requires an appropriately specified and sized
8 backflow preventer to be installed at the customer's expense on the discharge side of the
9 meter.

10 **Q. Question No. 11 in Commissioner’s Yanora’s letter asks whether SUEZ has evaluated**
11 **its lost and unaccounted-for water performance since 2018 and any relevant results.**

12 A. SWPA has a robust non-revenue water (“NRW”) program which focuses holistically on all
13 aspects of non-revenue and unaccounted-for water. Annually, SWPA submits AWWA
14 Audit forms to the PUC. The unaccounted-for-water (“UFW”) percentage for SWPA’s
15 combined systems in 2018 was 13.1%, in 2019 it was 14.6%, in 2020 it was 13.2%, and as
16 of June 2021 it is 14.2%. The UFW percentage for SWBE in 2018 was 10.4%, in 2019 it
17 was 13.2%, in 2020 it was 23.4%, and as of June 2021 it is 15.0%.

18 **Q. Does this conclude your supplemental direct testimony?**

19 A. Yes. I reserve the right to supplement my testimony as additional issues arise during the
20 course of this proceeding.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of Veolia Environnement S.A., :
Veolia North America, Inc., SUEZ S.A., SUEZ :
Water Pennsylvania Inc. and SUEZ Water Bethel :
Inc. for all approvals pursuant to Sections : Docket No. A-2021-3026523
1102(a)(3), (4), and 1103 of the Pennsylvania :
Public Utility Code, and as otherwise required :
under the Pennsylvania Public Utility Code for the :
change in control of SUEZ Water Pennsylvania :
Inc. and SUEZ Water Bethel Inc. :

EXHIBITS

OF

JOHN D. HOLLENBACH

August 19, 2021



COMMONWEALTH OF PENNSYLVANIA
PUBLIC UTILITY COMMISSION
400 NORTH STREET
HARRISBURG, PA 17120

RALPH V. YANORA
COMMISSIONER

July 13, 2021

Rosemary Chiavetta
Secretary, PA Public Utility Commission
400 North Street
Harrisburg, PA 17120

Re: Joint Application of Veolia Environnement S.A., Veolia North America, Inc., SUEZ S.A., SUEZ Water Pennsylvania Inc. and SUEZ Water Bethel Inc. for all approvals pursuant to Sections 1102(a)(3), (4), and 1103 of the Pennsylvania Public Utility Code, and as otherwise required under the Pennsylvania Public Utility Code for the change in control of SUEZ Water Pennsylvania Inc. and SUEZ Water Bethel Inc.; Docket No. A-2021-3026523

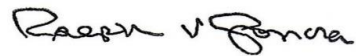
Dear Secretary Chiavetta,

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 SUEZ system;
- 2) SUEZ's plans to file a new tariff or tariff supplement in compliance with Act 120 of 2018, 66 Pa. C.S. § 1311(b)(2), regarding customer-owned lead service line replacements;
- 3) Compliance of the SUEZ tariff cross-connection control requirements with 25 Pa. Code §§ 109.709, 109.609 and any applicable provisions of the International Plumbing Code;
- 4) Compliance materials of SUEZ's 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 SUEZ's commercial meters in the system, the number tested, and the number passed or failed for year 2020;
- 6) The number of SUEZ's valves exercised in calendar year 2020 and the frequency of valve maintenance;

- 7) The number of SUEZ's commercial and industrial customers that have testable backflow prevention devices and the number of devices that were tested for calendar year 2020;
- 8) SUEZ's tariff backflow prevention requirements regarding residential fire protection and irrigation and whether SUEZ has a plan for inspection and testing of fire hydrants;
- 9) Whether SUEZ has surveyed the number of fire hydrants in its system that do not provide a minimum flow of 500 gpm at 20 psig;
- 10) Whether SUEZ's residential customers have American Society of Sanitary Engineers 1024 backflow assemblies installed at meter locations; and
- 11) Whether SUEZ has evaluated its 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 should you have any questions regarding my request.



Ralph V. Yanora
Commissioner

METER SETTING:

19. When the meter is installed inside the home or building, it shall be the responsibility of the customer to install the meter setting in a safe and readily accessible and protected location in the home or building in accordance with Company plans and specifications. The meter shall be installed at such a point where the customer service line enters the premise foundation wall so as to ensure all water is metered. Said location must be acceptable to the Company as most convenient for examination, reading, maintenance and/or removal of the meter.

20. The Customer shall install a meter pit or vault in accordance with Company plans and specifications. The meter pit or pit or vault shall be placed within the street or highway right-of-way at or just inside the Customer's property line, or at such other location as may be ordered by the Company.

21. The cover and locking device for each outside meter vault or meter box shall conform to a uniform standard established by the Company.

For meters requiring a confined space pit the meter shall have remote reading capability so as to eliminate the need to enter the pit to read the meter.

Meter pit lids shall be set flush with the surrounding surface and shall not have any obstruction overhanging the meter pit, such as shrubbery, porches or steps which would prevent reasonable ease in obtaining a meter reading or installing or replacing the meter.

22. An appropriately specified and sized backflow preventor, as approved by the American Water Works Association, will be installed at the customer's expense on the discharge side of the meter at a point prior to the installation of any branch piping to prevent the backflow of water into the Company's meter. The type of backflow preventor will be determined by the Company and will be based on the customer's usage hazard classification.

In the case of meters two (2") inches and larger, the customer shall provide suitable piping and valves to by-pass the meter in order to provide uninterrupted service during testing and/or changing of the meter. All bypasses shall be fitted with a lockable control valve to prevent unauthorized and unmetered water use during normal periods of service. In the case of an unmetered fire sprinkler system, a double check valve backflow with a detector check shall be installed.

Backflow preventors shall be required for all new services and when feasible for replacement services.

23. A control valve shall be placed by the Customer on the service line on the inlet and outlet sides of the meter. When required, a suitable check valve should be placed by the Customer between the meter and the control valve on the outlet side of the meter. When a check valve, backflow prevention device or pressure reducing valve is installed, the Customer shall install a pressure relief valve and a thermal expansion tank (to be sized and designed by the Customer or his agent) at some convenient point on the house piping to relieve pressure fluctuations and/or excess pressure due to heating water. In accordance with the specifications of the Company, the Customer shall install a pressure reducing valve (PRV), to be set at a pressure not to exceed the applicable limits, as follows: 1) on the domestic service line when the pressure on the Company's distribution system exceeds 100 pounds per square inch (psi); 2) on the fire service line when the pressure exceeds 150 psi; or 3) when required in the discretion of the Company where it is believed that the pressure may exceed either limit. The Customer or his authorized agent shall check with the Company to determine whether a pressure reducing valve is required prior to finalizing the design of the internal plumbing system. In all cases, the pressure-reducing valve must be installed at a location after the inlet control valve and before the meter, but in the case of the domestic service line an additional control valve must be installed between the PRV and the meter.

METER TESTING:

24. The quantity of water recorded by the meter shall be conclusive for both the customer and the Company, except when the meter has been found to be registering inaccurately or has ceased to register in either of such cases, the meter will be promptly repaired or replaced by the Company and the quantity of water consumed shall be estimated by the average registration of the meter on previous corresponding periods.

25. In case of a dispute bill involving the accuracy of a meter, such meter shall be tested, upon the request of the customer, in conformity with the provisions of the rules and regulations pertaining thereto of the Pennsylvania Public Utility Commission. If the meter so tested is found to have an error in registration of four per cent (4%) or more, the bills will be increased or decreased accordingly as provided by the said rules.

26. Each request for the testing of a meter for accuracy shall be in writing and shall be accompanied by a deposit, the amount of which shall be determined by the size of the meter as set forth in applicable rules and regulations of the Pennsylvania Public Utility Commission. If the meter so tested shall be found to have an error in registration of less than four per cent (4%), the deposit shall be retained by the Company as compensation for such test. If the error in registration is found to be four per cent (4%) or more, then the cost of the test shall be borne by the Company and the amount of the deposit shall be returned to the customer. A report of the test shall be made to the customer.

SERVICE CONNECTION

1. The Company will make all connections to its mains and will furnish, install and maintain all service lines from the main to and including the curb cock and box, which shall be placed inside the curb line, all of which service line shall be the property of the Company and shall be accessible to and under its control.
2. All service lines from the curb to the meter shall be approved by the Company as to size, kind of pipe and installation, and shall be kept in good repair by the customer at his expense. All such service lines shall be placed at least four feet below the final graded surface of the ground.
3. No service line shall be laid in the same trench or with less than four feet horizontal separation and 18 inches vertical separation from any gas pipe, sewer pipe, buried electric or telephone wires, or any other facility of a public service company or authority; and no line shall be laid within four feet horizontally of any open excavation vault, embankment or ditch.
4. Stop and waste valves, easily accessible to the occupants, shall be placed in the service line within the premises supplied with water. Such valves shall be located so that it will be possible to drain the meter and all pipes in the building.
5. All leaks in service lines from the curb to, and in and upon the premises supplied shall be promptly repaired. On failure to make such repairs, with reasonable dispatch, the Company may turn off the water and it will not be again turned on until repairs are completed. Residential customers will be notified in accordance with Section 56.71 of the consumer standards and billing practices for residential service.
6. Requests for the temporary shut-off or turn-on of service during normal business hours for routine maintenance or service will be honored with out charge to the customer. However, such requests for service during other than normal business hours will carry a charge for the Company's costs.
7. The Company shall, in no event, be responsible for maintenance of, or for damage done by, water escaping from the service line or any other pipe or fixture on the outlet side of the curb cock; and the customer, at all times, shall comply with state and municipal regulations in reference thereto and shall make any changes thereon which may be required because of change of grade, relocation of mains, or otherwise.
8. A customer shall not use, or allow use of water service through his service facilities for others or for purposes other than those covered by his application. To make service available for other purposes or character of use, a new application and contract is required.
9. No direct connection of pumping equipment for any purpose or cross-connection with any other piping system will be allowed unless approved in writing by the Company.

must be acceptable to the Company as most convenient for examination, reading, maintenance and/or removal of the meter.

16. The Customer shall install a meter pit or vault in accordance with Company plans and specifications. The meter pit or pit or vault shall be placed within the street or highway right-of-way at or just inside the Customer's property line, or at such other location as may be ordered by the Company.

17. The cover and locking device for each outside meter vault or meter box shall conform to a uniform standard established by the Company.

17A. For meters requiring a confined space pit the meter shall have remote reading capability so as to eliminate the need to enter the pit to read the meter.

17B. Meter pit lids shall be set flush with the surrounding surface and shall not have any obstruction overhanging the meter pit, such as shrubbery, porches or steps which would prevent reasonable ease in obtaining a meter reading or installing or replacing the meter.

18. An appropriately specified and sized backflow preventor, as approved by the American Water Works Association, will be installed at the customer's expense on the discharge side of the meter at a point prior to the installation of any branch piping to prevent the backflow of water into the Company's meter. The type of backflow preventor will be determined by the Company and will be based on the customer's usage hazard classification.

18A. In the case of meters two (2") inches and larger, the customer shall provide suitable piping and valves to by-pass the meter in order to provide uninterrupted service during testing and/or changing of the meter. All bypasses shall be fitted with a lockable control valve to prevent unauthorized and unmetered water use during normal periods of service. In the case of an unmetered fire sprinkler system, a double check valve backflow with a detector check shall be installed

METER TESTING

19. The quantity of water recorded by the meter shall be conclusive for both the customer and the Company, except when the meter has been found to be registering inaccurately or has ceased to register. In either of such cases, the meter will be promptly repaired or replaced by the Company and the quantity of water consumed shall be estimated by the average registration of the meter on previous corresponding periods except for an account where it is apparent that the information is clearly erroneous.