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October 4, 2021

Via Electronic Filing

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

In Re: Application of Columbia Water Company Pursuant to Sections 1102 of the Public Utility Code For: Approval Of the Acquisition Of the Water System Of East Donegal Township Municipal Authority; Approval Of The Right For Columbia Water Company To Offer, Render Furnish And Supply Water Service To The Public In Portions Of East Donegal Township, Lancaster County; Registration Of A Securities Certificate; And all Other Approvals Or Certificates Appropriate, Customary Or Necessary Under The Public Utility Code To Carry Out The Transactions Described In The Application; Request For Certificates Of Filing For Contracts Between Columbia Water Company And East Donegal Township Municipal Authority, Pursuant To Section 507 Of The Public Utility Code; Docket No. A-2021-3027134 and S-2021-3027145; **RESPONSES TO OFFICE OF CONSUMER ADVOCATE'S INFORMAL DISCOVERY REQUESTS**

Dear Secretary Chiavetta,

Enclosed for filing on behalf of Columbia Water Company please find responses to informal data requests in this proceeding. These materials are being filed for inclusion in the Commission's official docket of the proceeding.

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

Respectfully submitted,

/s/ Whitney E. Snyder

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

Counsel for Columbia Water Company

WES/das
Enclosure

cc: Erin L. Gannon
David Lewis
Michael Davis (mdavis@barley.com)
Daniel Desmond (ddesmond@barley.com)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA EMAIL ONLY

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/s/ Whitney E. Snyder
Thomas J. Sniscak
Whitney E. Snyder
Bryce R. Beard

Dated: October 4, 2021

Columbia Water Company Response to OCA Informal Discovery Requests
Docket Nos. A-2021-3027134 *et al.*

1. Please provide the current rates for the Authority's customers and, if known, how long they have been in effect.

Response:

Attached are the current rates for the Authority's customers. These rates became effective 07/01/2020.

RATE SCHEDULE
EAST DONEGAL TOWNSHIP MUNICIPAL AUTHORITY
EFFECTIVE AS OF JULY 1, 2020

USE CLASSIFICATION	WATER USE RATES
CENTRAL RATE DISTRICT	
Residential Users:	
First 9,000 Gallons per Quarter	$48.00 /Quarter
All over 9,000 Gallons per Quarter	$2.10 /1000 gal.
Commercial Users:	
First 14,000 Gallons per Quarter	$73.00 /Quarter
All over 14,000 Gallons per Quarter	$2.10 /1000 gal.
Industrial Users:	
First 75,000 Gallons per Month	$390.26 /Month
All over 75,000 Gallons per Month	$3.00 /1000 gal.
Farm Users:	
First 35,000 Gallons per Quarter	$182.58 /Quarter
All over 35,000 Gallons per Quarter	$2.10 /1000 gal.
Late Payment Charge	$8.00 /Quarter

2. With regard to the rate freeze provision of the Purchase Agreement, does Columbia Water acknowledge that the Commission has authority to set rates that differ from those agreed upon by Columbia Water and the Authority?

Response:

Columbia Water Company acknowledges that the Commission has authority under certain circumstances and conditions to set rates that differ from those agreed upon by Columbia Water and the Authority.

3. When does Columbia Water anticipate filing its next base rate case?

Response:

No firm plans have been set at this time but the possibility exists that Columbia Water Company could make a rate filing in 2023 depending upon financial conditions.

4. The Application indicates that an Income Statement for the Authority is provided in Appendix 3. Please provide an Income Statement and, to the extent not provided therein, please provide information regarding Columbia Water's estimated annual revenues and expenses for the acquired water system.

Response:

Attached are the Authority's financial statements for the period ending September 30, 2020. The Authority's fiscal year runs October 1 through September 30. Columbia Water Company anticipates annual revenues of approximately $600,000 and expenses of approximately $450,000.

EAST DONEGAL TOWNSHIP MUNICIPAL AUTHORITY
MAYTOWN, PENNSYLVANIA

FINANCIAL STATEMENTS
SEPTEMBER 30, 2020

AND

REPORT OF CERTIFIED PUBLIC ACCOUNTANTS

EAST DONEGAL TOWNSHIP MUNICIPAL AUTHORITY
MAYTOWN, PENNSYLVANIA

SEPTEMBER 30, 2020

C O N T E N T S

SAGER, SWISHER AND COMPANY, LLP

Certified Public Accountants and Consultants

Members

American Institute of
Certified Public Accountants

Pennsylvania Institute of
Certified Public Accountants

Partners

John D. Murr, CPA
Michael L. Reiner, CPA
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619 West Chestnut Street
Lancaster, Pennsylvania 17603

15 North Third Street
Columbia, Pennsylvania 17512

Consultants

Edward M. Sager (1932-2011)
C. Edwin Swisher, III, CPA, Inactive

INDEPENDENT AUDITOR'S REPORT

To the Members of the Board
East Donegal Township Municipal Authority
Maytown, Pennsylvania

Report on the Financial Statements

We have audited the accompanying financial statements of the East Donegal Township Municipal Authority as of and for the year ended September 30, 2020, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements as listed in the table of contents.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express opinions on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinions.

Opinions

In our opinion, the financial statements referred to above presented fairly, in all material respects, the respective financial position of East Donegal Township Municipal Authority as of September 30, 2020 and the respective changes in financial position and cash flows thereof for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Lancaster 717-299-4563
Fax 717-299-1364

www.sagerswisher.com

Columbia 717-684-2077
Fax 717-684-7433

Other Matters

Required Supplementary Information

Management has omitted the management's discussion and analysis that accounting principles generally accepted in the United States of America require to be presented to supplement the basic financial statements. Such missing information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board, who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. Our opinion on the basic financial statements is not affected by this missing information.

Sager, Swisher and Company, LLP

Columbia, Pennsylvania
June 11, 2021

EAST DONEGAL TOWNSHIP MUNICIPAL AUTHORITY
MAYTOWN, PENNSYLVANIA

STATEMENT OF NET POSITION
SEPTEMBER 30, 2020

ASSETS	
Current Assets	
Cash and Cash Equivalents	$ 1,000,136
Cash - Escrow Deposits	41,180
Accounts Receivable – Other	27,796
Accounts Receivable – Water Rents	153,987
Total Current Assets	1,223,099
Restricted Assets	
Cash and Cash Equivalents	13,043
Total Restricted Assets	13,043
Capital Assets	
Property, Plant and Equipment (Net of Accumulated Depreciation)	2,590,313
Total Capital Assets	2,590,313
Total Assets	$ 3,826,455
LIABILITIES	
Current Liabilities	
Accounts Payable	$ 28,154
Payroll Withholdings	3,211
Developer Escrows	41,088
Total Current Liabilities	72,453
TOTAL LIABILITIES	72,453
NET POSITION	
Net Investment in Capital Assets	2,590,313
Restricted	13,043
Unrestricted	1,150,646
TOTAL NET POSITION	3,754,002
TOTAL LIABILITIES AND NET POSITION	$ 3,826,455

The accompanying notes are an integral part of these financial statements.

EAST DONEGAL TOWNSHIP MUNICIPAL AUTHORITY
MAYTOWN, PENNSYLVANIA

STATEMENT OF REVENUE, EXPENSES, AND CHANGES IN NET POSITION
YEAR ENDED SEPTEMBER 30, 2020

OPERATING REVENUE	
Charges and Fees	
User Fees	$ 488,829
Administrative Fees	1,774
TOTAL OPERATING REVENUE	490,603
OPERATING EXPENSES	
Administrative Expenses	
Personnel Costs	17,020
Officer Compensation	21,125
Legal Services	39,873
Professional Services	23,607
Office Expenses	6,563
Total Administrative Expenses	108,188
Plant Expenses	
Personnel Costs	111,486
Payroll Taxes	9,946
Engineering Fees	36,259
Plant Maintenance	72,199
Plant Utilities	39,610
Chemicals	46,019
Insurance	17,024
Lab Testing	13,438
Other Plant Expenses	6,125
Permits	6,500
Depreciation	198,633
Total Plant Expenses	557,239
TOTAL OPERATING EXPENSES	665,427
OPERATING INCOME (LOSS)	(174,824)
NON-OPERATING REVENUES (EXPENSES)	
Interest Income	11,403
Rental Income	24,394
Tapping Fees	6,000
Refund of Prior Year's Revenues	(8,859)
TOTAL NON-OPERATING REVENUES (EXPENSES)	32,938
Changes in Net Position	(141,886)
Net Position – Beginning of Year	3,895,888
Net Position – End of Year	$ 3,754,002

The accompanying notes are an integral part of these financial statements.

EAST DONEGAL TOWNSHIP MUNICIPAL AUTHORITY
MAYTOWN, PENNSYLVANIA

STATEMENT OF CASH FLOWS
YEAR ENDED SEPTEMBER 30, 2020

CASH FLOWS FROM OPERATING ACTIVITIES	
Cash Received from Customers	$ 479,397
Cash Payments for Goods and Services	(314,663)
Cash Payments to Employees	(124,497)
NET CASH PROVIDED BY OPERATING ACTIVITIES	40,237
CASH FLOWS FROM NONCAPITAL FINANCING ACTIVITIES	--
CASH FLOWS FROM CAPITAL AND RELATED FINANCING ACTIVITIES	
Payments for Capital Acquisitions	(335,305)
Tapping Fee Revenue	6,000
Rental Income	24,394
NET CASH PROVIDED BY (USED FOR) CAPITAL AND RELATED FINANCING ACTIVITIES	(304,911)
CASH FLOWS FROM INVESTING ACTIVITIES	
Earnings on Investments	11,403
NET CASH PROVIDED BY INVESTING ACTIVITIES	11,403
Net (Decrease) in Cash and Cash Equivalents	(253,271)
Cash and Cash Equivalents – Beginning of Year	1,307,630
Cash and Cash Equivalents – End of Year	$ 1,054,359

Reconciliation of Operating Income to Net Cash Provided by Operating Activities	
Operating (Loss)	$ (174,824)
Adjustments to Reconcile Operating Income (Loss) to Net Cash Provided by Operating Activities	
Depreciation	198,633
(Increase) Decrease In	
Accounts Receivable	(11,203)
Increase (Decrease) In	
Accounts Payable	8,140
Payroll Withholdings	(1,469)
Developer Escrows	20,960
NET CASH PROVIDED BY OPERATING ACTIVITIES	$ 40,237

The accompanying notes are an integral part of these financial statements.

EAST DONEGAL TOWNSHIP MUNICIPAL AUTHORITY
MAYTOWN, PENNSYLVANIA

NOTES TO THE FINANCIAL STATEMENTS
SEPTEMBER 30, 2020

NOTE 1 – REPORTING ENTITY AND SIGNIFICANT ACCOUNTING POLICIES

The East Donegal Township Municipal Authority (the "Authority"), Maytown, Pennsylvania, was organized by the Supervisors of East Donegal Township, Pennsylvania, under the laws of the Commonwealth of Pennsylvania pursuant to the Municipal Authorities Act of 1945, approved May 2, 1945 P.L. 382 as amended. The Authority, which was incorporated in 1949, operates a water supply and distribution system in East Donegal Township. The Board of Directors amended the Articles of Incorporation on November 4, 1989 to extend the existence of the Authority to November 1, 2039. Water rents are billed on a quarterly basis to customers based on individual meter readings.

The financial statements of the East Donegal Municipal Authority have been prepared in accordance with generally accepted accounting principles (GAAP) as applied to governmental units. The Governmental Accounting Standards Board (GASB) is the authoritative standard-setting body for the establishment of governmental accounting and financial reporting principles. The more significant of these accounting policies are as follows:

A. Basis of Accounting

The Authority uses the accrual method of accounting. Revenue is recognized in the period in which earned and becomes measurable. Expenses are recognized at the time they are incurred.

The accounts of the Authority are organized on the basis of funds, each of which is considered a separate accounting entity. The operations of each fund are accounted for by providing a separate set of self-balancing accounts which comprise its assets, liabilities, fund equity, revenues, and expenses. Resources are allocated to and accounted for in individual funds based upon the purposes for which they are to be spent.

B. Basis of Presentation

The Authority reports one major fund type as follows:

Proprietary Fund Types – these funds account for operations that are organized to be self-supporting through user charges. Included in this category are Enterprise Funds.

Enterprise Funds – these funds are established to account for operations in a manner similar to private business enterprises, where the costs of providing goods or services to the general public on a continuing basis are intended to be financed or recovered primarily through user charges. The Enterprise Funds of the Authority are as follows:

Water Revenue Fund – used to account for revenues earned and expenses incurred in the operation of the water distribution system.

C. Measurement Focus

The Proprietary Fund is accounted for on a flow of economic resources measurement focus. All assets and liabilities (current and noncurrent) associated with the activity funds are included on the Statement of Net Position. The Statement of Revenue, Expenses and Changes in Net Position presents increases and decreases in total net position.

D. Cash and Restricted Cash

The Authority considers all cash accounts and all highly liquid, including restrict assets, to be cash equivalents. Restricted cash represents cash received from developers and held in separate accounts. The funds will be utilized for development plan reviews and inspection fees. Any unused funds will be returned to the developer.

NOTE 1 – REPORTING ENTITY AND SIGNIFICANT ACCOUNTING POLICIES (Continued)

E. Accounts Receivable

It is the Authority's policy to record an allowance for doubtful accounts based on management's assessment of the collectability of specific balances and the aging of accounts receivable. Management has determined that no valuation allowance for uncollectible account is required as of September 30, 2020.

F. Inventories

Inventories of supplies are minimal and expensed by the Authority and therefore are not reflected on the financial statements.

G. Capital Assets

Capital assets, which include property, plant, equipment, and infrastructure assets (e.g. water lines), are defined by the Authority as assets with an initial cost of more than $1,000 and an estimated useful life in excess of two years. Assets are reported at cost. Contributed capital assets are recorded at fair market value at the time they are received and consist primarily of distribution lines and connections constructed and donated by developers.

The cost of normal maintenance and repairs that do not add to the value of the asset or materially extend asset lives are not capitalized. Major outlays for capital assets and improvements are capitalized as projects are constructed.

All reported capital assets are depreciated using the straight-line method over the following estimated useful lives:

Assets	Years
Land	--
Water source of supply and treatment	40 to 50
Water storage and distribution	40 to 50
Capacity rights	40
Meters and service connections	20 to 25
Buildings and improvements	10 to 50
Office and general equipment	5 to 10

H. Compensated Absences

Some employees of the Authority are eligible for compensation for vacation and sick leave. Compensated absences for vacation and sick pay have not been accrued since management considers the amount to be insignificant and are expensed as incurred.

I. Estimates

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect certain reported amounts and disclosures. Accordingly, actual results could differ from those estimates.

J. Deferred Outflows/Inflows of Resources

In addition to assets, the statement of financial position will sometimes report a separate section for deferred outflows of resources. This separate financial statement element, deferred outflows of resources, represents a consumption of net position that applies to a future period and so will not be recognized as an outflow of resources until then. During the year ended September 30, 2020, the Authority did not have any deferred outflows of resources.

NOTE 1 – REPORTING ENTITY AND SIGNIFICANT ACCOUNTING POLICIES (Continued)

J. Deferred Outflows/Inflows of Resources (Continued)

In addition to liabilities, the statement of financial position will sometimes report a separate section for deferred inflows of resources. This separate financial statement element, deferred inflows of resources, represents an acquisition of net position that applies to a future period and so will not be recognized as an inflow of resources until that time. During the year ended September 30, 2020, the Authority did not have any deferred inflows of resources.

K. Net Position Flow Assumption

Sometimes the Authority will fund outlays for a particular purpose from both restricted and unrestricted resources. It is the Authority's policy to consider restricted – net position to have been depleted before unrestricted – net position is applied.

L. Budget

The Authority is not required to adopt a budget on an annual basis; however, a budget is adopted annually in order to enhance the operating effectiveness of the Authority.

M. Date of Management's Review

Management has evaluated subsequent events through June 11, 2021, the date the financial statements were available to be issued.

NOTE 2 – CASH AND CASH EQUIVALENTS AND INVESTMENTS

The Pennsylvania Municipal Authorities Act, Section 7.1 requires that the Authority's deposits be federally insured. Deposits above the insured maximum are required to have collateral pledged in the name of the financial institution. In addition, the following types of investments are authorized:

1. United States Treasury Bills
2. Short-term obligations of the United States Government, its agencies or its instrumentalities
3. Obligations of the United States of America or any of its agencies or instrumentalities backed by the full faith and credit of the United States of America, the Commonwealth of Pennsylvania or any of its agencies or instrumentalities

The statutes do not prescribe regulations related to demand deposits; however, they do allow the pooling of governmental funds for investment purposes. Deposits of the Authority's funds are maintained in demand deposits at various financial institutions. The cash and cash equivalents are stated at cost, which is equal to market value. Cash and cash equivalents are defined as short-term highly liquid investments that are readily convertible to known amounts of cash and include investments with original maturities of three months or less.

Cash

Custodial Credit Risk – Deposits

Custodial credit risk is the risk that in the event of a bank failure, the Authority's deposits may not be returned. The Authority does not have a policy for custodial credit risk. As of September 30, 2020, none of the Authority's bank balance of $179,381 was exposed to custodial credit risk.

NOTE 2 – CASH AND CASH EQUIVALENTS AND INVESTMENTS (Continued)

Reconciliation to Financial Statements

Insured Amount	$ 179,381
Less: Outstanding Checks	(629)
Carrying Amount – Bank Balances	178,752
Plus: Pooled Cash and Cash Equivalents – PLGIT	875,607
Total Cash per Financial Statements	$ 1,054,359

Interest Rate Risk

The Authority does not have a formal investment policy that limits investment maturities as a means of managing its exposure to fair value losses arising from increasing interest rates. Management does monitor rates of returns for investments on a monthly basis.

Credit Risk

The Authority does not have an investment policy that would limit its investment choices to certain credit ratings.

Concentration of Credit Risk

The Authority holds deposit accounts at various financial institutions. The total deposits of $1,054,988 as of September 30, 2020 were invested in the various financial institutions as follows:

Financial Institution	Deposit Amount	Concentration Percentage
PLGIT	$ 875,607	82.99%
Northwest Bank	179,381	17.01%
	$ 1,054,988	100.00%

NOTE 3 – ACCOUNTS RECEIVABLE - OTHER

During the year ended September 30, 2018, the Authority signed a cost-sharing agreement with the Commonwealth of Pennsylvania (the “Commonwealth”) for the re-paving of Route 743. Under this agreement, the Commonwealth agreed to reimburse the Authority 75% of the costs of the construction. During the year ended September 30, 2018, the Authority incurred costs of $44,576 and expected to be reimbursed $36,655, which was included in the Authority’s financial statements at September 30, 2019. The amount remained an outstanding receivable as of September 30, 2020, however, only $27,796 was received by the Authority in February 2021. As a result, the receivable was adjusted to $27,796 and is reflected in these financial statements as Accounts Receivable – Other.

NOTE 4 – ACCOUNTS RECEIVABLE – WATER RENTS

The Authority recognizes revenue for water rents in the period when the water is used rather than in the period when the bills are sent out. Metered water accounts are read and billed on a quarterly basis. Therefore, water used during the last quarter of the fiscal year ended September 30, 2020, but not billed until after that date, is recognized as revenue in the fiscal year ended September 30, 2020. As of September 30, 2020, unbilled receivables, which are a part of accounts receivable, were $109,016.

NOTE 5 – ESCROWS

The Authority receives and disburses escrow deposits for various development and construction projects to ensure proper compliance with Authority regulations. The cash balance of escrow deposits at September 30, 2020 was $41,180 and is included as cash - escrow deposits in these financial statements. This amount includes $92 of interest available for operations. The liability for these deposits is included in these financial statements as Developer Escrows in the amount of $41,088.

NOTE 6 – CHANGES IN CAPITAL ASSETS

	Beginning Balance	Increases	Decreases	Ending Balance
Water Fund				
Capital Assets, Not Being Depreciated				
Land	$ 93,047	$ --	--	93,047
Construction in Progress	218,785	--	218,785	--
Total Capital Assets Not Being Depreciated	311,832	--	218,785	93,047
Capital Assets Being Depreciated				
Building, water tanks, wells and spring basin	2,584,672	--	--	2,584,672
Water distribution system and equipment	3,909,653	363,984	--	4,273,637
Office Equipment	4,145	--	--	4,145
Total Capital Assets Being Depreciated	6,498,470	363,984	--	6,862,454
Less Accumulated Depreciation for:				
Building, water tanks, wells and spring basin	2,133,875	83,477	--	2,217,352
Water distribution system and equipment	2,032,015	114,327	--	2,146,342
Office Equipment	665	829	--	1,494
Total Accumulated Depreciation	4,166,555	198,633	--	4,365,188
Total Capital Assets, Being Depreciated, Net	2,331,915	165,351	--	2,497,266
Water Fund, Capital Assets, Net	$ 2,643,747	$ 165,351	$ 218,785	$ 2,590,313

NOTE 7 – CONTRIBUTED CAPITAL

Capital contributions consist of contributed capital assets and special charges that are legally restricted for capital expenditures by state law or by the Board of Directors action that establishes those charges. Contributed capital is included on these statements in Net Investment in Capital Assets. The contributed capital is composed of the following:

Water Distribution Systems assumed from Developers	$ 417,759
Lancaster County Redevelopment Authority Community Development Block Grant for the Rowenna Project	298,949
	$ 716,708

NOTE 8 – LEASES

The Authority leases space on top of the water tower to a cell phone company to use for wireless communication services. The lease began in 1999 with an initial five-year term. The lease automatically renews on January 1 for four successive five-year terms with a 12.5% increase at each renewal period. Payments on this lease are due at the beginning of each month in the amount of $1,859 through 2019 and in the amount of $2,091 for months during 2020. The Authority received $24,394 in rental income during the year ended September 30, 2020.

The future annual lease payments for the Authority for the next five years are as follows:

Year Ended September 30,	
2021	$ 25,092
2022	25,092
2023	25,092
2024	25,092
2025	6,273
	$ 106,641

NOTE 9 – CONCENTRATION OF RISK

The Authority has one large industrial customer that comprised 23.18% of total user fees during the year ended September 30, 2020.

NOTE 10 – COVID-19

On March 11, 2020, the World Health Organization declared the outbreak of a coronavirus (COVID-19) a pandemic. As a result, economic uncertainties have arisen which are likely to negatively impact financial position. Other financial impact could occur though such potential impact is unknown at this time.

NOTE 11 – SUBSEQUENT EVENT

In May 2021, the Authority entered into a Sale and Purchase Agreement with the Columbia Water Company for the sale of the water production and distribution system. The purchase price for the system and related assets shall be $2,500,000, which is to be increased and/or decreased for various contingencies. The Authority received a deposit in the amount of $50,000 in May 2021 when the agreement was signed by both parties. The Authority will also receive a seven-year promissory note at 3% interest in the amount of $2,250,000 at closing. The remaining balance of the purchase price will be received in cash at closing.

5. Please provide the anticipated impact of the proposed financing on Columbia Water's capital structure, cost of debt and overall rate of return.

Response:

Columbia Water Company's anticipated capital structure and cost of debt are shown in Exhibit 2 in the filing we made on July 7, 2021. An anticipated overall rate of return after acquisition of the Authority's system is 4.0%.

6. Please provide system maps (redacted pages 32 and 33 of Exhibit A to the Sale and Purchase Agreement) to the extent not provided in Appendix 10 to the Application. The OCA will treat them as confidential.

Response:

A link will be provided to these exhibits, which are Confidential Security Information.

These materials are not being filed with the Commission as they were previously included with the original filing in hard copy.

7. Will Columbia Water operate the Authority as a stand-alone system? If so, does Columbia Water have any future plans to interconnect? Please explain.

Response:

The Authority's water system has its own sources of supply, distribution system and storage facilities. An emergency interconnection has existed between the Authority's system and the Marietta system for at least 3 decades and has been used rarely. It is the intent of Columbia Water Company to operate the water system as a stand-alone system and to maintain the emergency interconnection.

8. Please provide a copy of the Condition Assessment (dated August 2020) that is referenced in the Purchase Agreement.

Response:

Attached is a copy of the Condition Assessment.

COLUMBIA WATER COMPANY
EDTMA CONDITION ASSESSMENT

August 2020

BUCHART HORN
ENGINEERS • ARCHITECTS • PLANNERS

Table of Contents

1.0 BACKGROUND

Columbia Water Company (CWC) is evaluating the purchase of the East Donegal Township Municipal Authority's (EDTMA) water system and has requested that Buchart Horn, Inc. (BH) conduct a condition assessment of the system. In general, the EDTMA water system consists of two groundwater well sources and a spring source, a treatment facility designed for the removal of nitrates from the raw water, and a storage and distribution system. The following assets have been identified:

1. Spring and Pump House
2. Well No. 1
3. Well No. 2
4. Nitrate Treatment Plant
5. 500,000 gallon Fluted Column Elevated Storage Tank
6. 300,000 gallon Multi Column Elevated Storage Tank
7. 100,000 gallon Multi Column Elevated Storage Tank
8. Route 441 Chlorine Booster Station
9. 97,509 feet of distribution system piping (24,732 feet AC, 71,399 feet DIP, 1,378 feet PVC)
10. 130 fire hydrants and 494 valves in the distribution system
11. 11,477 feet of raw water piping (7,230 feet DIP, 4,247 feet PVC).

2.0 FACILITY DESCRIPTIONS

2.1 Spring

Site – The spring is located in the middle of a farm field within a fenced property at 2651 Maytown Road, Marietta, PA. Access is by an asphalt/gravel road shared with the farmer. The buildings include door switches, a motion detector, and basement flooding alarm. There is no video surveillance at the site.

Spring Facility – The Spring began operation in 1948 when an open spring and the Pump Building was constructed. The Pump Building is a 725 square foot, two story block structure (ground floor and basement), with concrete foundation walls and ground level floor, and a wood truss roof structure. In 1982, the Spring was enclosed with concrete walls and stone floor and covered with a roof consisting of block end walls and wood truss roof structure. It is believed that the pumps (two), rated at 250 gpm each, were originally installed in 1993. One of the pumps and the piping were replaced in 2009. The inspection form for the Spring is provided in Appendix A.

Electrical System – The site is served by a 400 amp, 3-phase, 120/240 volt service. There is no emergency/standby generator. The electrical inspection form for the Spring is also provided in Appendix A.

2.2 Well No. 1

Site – Well No. 1 is located on property owned by East Donegal Township at their Municipal Complex at 190 Rock Point Rd, Marietta, PA. The building includes a door switch and motion detector. There is no video surveillance at the site.

Well House – The well is housed within a 988 square foot building attached to a Township storage building. Approximately 728 square feet of the building houses the generator and storage area and the remaining 260

square feet is the well house. Block on the east wall shows joint cracks and possible water/moisture damage. An apparent prior repair on north wall is evident.

The well was drilled in 1980 to a depth of approximately 492 feet. A line shaft vertical turbine pump is installed in the well. It appears that a new pump and column pipe was installed in 2012, but the motor is original from 1981. The pump is rated at 250 gpm. Well was drilled as an alternate source when the spring came under the scrutiny of DEP in 1980 due to high nitrate levels, but the well also showed high levels of nitrate. The inspection form for Well No. 1 is provided in Appendix B.

Electrical System – The site is served by a 200 amp, 3-phase, 120/208 volt service. There is a 125kW/156kVA emergency/standby diesel generator and manual transfer switch. The electrical inspection form for Well No. 1 is also provided in Appendix B.

2.3 Well No. 2

Site – Well No. 2 is located on a fenced site just east of Well No. 1 at 215 Rock Point Rd, Marietta, PA. Access is by a gravel road. The building includes a door switch and motion detector. There is no video surveillance at the site.

Well House – Well No. 2 was drilled in 1998 after EDTMA had difficulty meeting the system demand during drought conditions. The well was drilled to a depth of 309 feet, then backfilled with cement grout to a depth of 168.5 feet to isolate zones producing high total dissolved solids water. The well is housed within a 330 square foot block and brick building. A line shaft vertical turbine pump is installed in the well at a pump setting of 120 feet. It appears that a new pump was installed in 2005. The 40 HP motor and discharge head appear to be original from 2000. Pump is rated for 225 gpm at 80% speed and is provided with a variable frequency drive (VFD). The inspection form for Well No. 2 is provided in Appendix C.

Electrical System – The site is served by a 200 amp, 3-phase, 480 volt service. There is an 80kW/100kVA emergency/standby propane generator and automatic transfer switch. The electrical inspection form for Well No. 2 is also provided in Appendix C.

2.4 Nitrate Treatment Plant

The facility consists of an 820 square foot building that houses three seven foot diameter steel pressure ion exchange vessels designed for nitrate removal, sodium hypochlorite feed equipment, a regeneration waste holding tank (concrete tank below the treatment room), and a 160 square foot office. Two fiberglass salt/brine silos are located outside the building. The inspection form for the nitrate treatment plant is provided in Appendix D.

Site – The Nitrate Treatment Plant is located at 34 East Jacob Street Maytown, PA. The site is enclosed by a 6-foot high fence installed in 2018. The fence includes a 25-foot gate with an automatic gate opener. There is an asphalt paved access road. The building includes a motion detector, door switches, and fire alarm. There is no video surveillance at the site. The 300,000 gallon and the 100,000 gallon elevated finished water storage tanks are also located on the site within the fenced area.

Treatment System – The Nitrate Treatment Plant is rated for a capacity of 600 gpm (0.864 MGD), but operated at an average of 0.377 MGD and maximum of 0.494 MGD during 2017 and 2018. The Raw water from Well No. 1, Well No. 2, and the Spring is pumped in dedicated raw water mains to the treatment building, through the pressure

ion exchange vessels and to the distribution system after being dosed with sodium hypochlorite for disinfection. It appears that the two wells are remotely stopped and started from the plant to maintain the system pressure, with the lead well selectable. Generally, about 12-15 percent of the raw water is bypassed around the ion exchange vessels and blended with the treated water to maintain a finished water nitrate concentration in the range of 3-6 mg/l. The raw water nitrate concentrations are unknown. Other notable raw water quality data that is available is that the water is very hard (370-390 mg/l) and has relatively high levels of ammonia (1.5-8.7 mg/l).

Sodium hypochlorite is dosed into the treated water for disinfection. There are five feed pumps and three day tanks. Drums of sodium hypochlorite are stored in the treatment area. There is no secondary containment. Chlorine contact is provided in three underground contact tanks (4,000 gallon, 6,000 gallon, and 7,000 gallon) located on the site. Corrosion on the treatment system, controls, and electrical components is visible and is due to the open chlorine feed system.

Sodium chloride (salt) is used to regenerate the ion exchange resin. Salt is purchased in bulk and stored in the two salt/brine silos located outside. The brine is transferred to a 600 gallon brine tank located in the building and from there is educted into the vessel to be regenerated. Approximately 6,000 gallons of waste brine is produced per regeneration. It appears that on average about one ion exchange vessel is regenerated per day. The waste brine is discharged into the waste holding tank and then flows by gravity to the sanitary sewer. Apparently the sewer piping becomes clogged periodically with scale from the brine and must be cleaned by discharging a significant volume of hydrochloric acid (55 gallons).

The plant has a water softener that is used to produce softened water for use in making up the brine solution and the sodium hypochlorite solution.

Electrical System – The site is served by a 200 amp, 1-phase, 120/240 volt service. There is a 20kW/25kVA emergency/standby propane generator located outside and automatic transfer switch. The electrical inspection form for the Nitrate Treatment Plant is also provided in Appendix D.

2.5 Elevated Storage Tanks

The distribution system storage consists of a 100,000 gallon tank, 300,000 gallon tank, and 500,000 gallon tank, for a total finished water storage volume of 900,000 gallons, or approximately 2.4 times the average day demand of the system. The inspection form for the Elevated Storage Tanks are provided in Appendix E.

100,000 Gallon Tank – This tank is an 86 foot high multi-column tank constructed in 1948 and located on the Nitrate Treatment Plant site. The tank was repainted and several upgrades were completed in 2001.

300,000 Gallon Tank – This tank is an 86 foot high multi-column tank constructed in 1982 and is also located on the Nitrate Treatment Plant site. The tank was repainted and several upgrades were completed in 2001.

500,000 Gallon Tank – This tank is a 144 foot high fluted column tank constructed in 1999. The tanks is located on a fenced site at 335 Coffee Goss Road, Marietta, PA. The site is accessed by a gravel road shared with the adjacent horse farm. The tank was inspected in 2015 and several OSHA/safety deficiencies and cracked welds in the base plates were noted. It appears that the cracked welds in the base plate may have been repaired. The inspection report recommended that wetted interior of the tank be repainted in 2018.

2.6 Chlorine Booster Station

The Chlorine Booster Station was installed in 1993 on Route 441 between Vinegar Ferry Road and Depot Road. It consists of a 24 square foot package fiberglass building with heater, exhaust fan, and sample sink. The site has an asphalt drive and a 60 amp, 120/240 volt electrical service. The site was not inspected. It is reported that the chlorine gas feed equipment still exists, but there are no cylinders onsite. The site is not currently used for chlorination, but is used for sampling only. Chlorination equipment may be approaching the end of the expected service life.

2.7 Distribution System

Piping – Based on the available information, the distribution system consist of 97,509 feet of distribution system piping. A breakdown of the size, type and age of the piping is available in the mass property inventory.

It has been reported that there are no lead service lines. All of the service lines are copper.

Fire Hydrants –The system includes 130 fire hydrants.

Valves – The system includes 494 valves, but no valve size information has been made available.

2.8 Raw Water Piping

Piping – Based on the available information, the system includes 11,477 feet of raw water piping. A breakdown of the size, type and age of the piping is available in the mass property inventory.

Valves – No data has been made available on the number or size of valves on the raw water piping.

3.0 REGULATORY STATUS

3.1 Susquehanna River Basin Commission (SRBC)

Based on a review of Docket No. 20190314, the SRBC has approved the following withdrawals effective until March 6, 2026:

Source	30-Day Avg. (MGD)	Max. Instantaneous (gpm)	Comments
Well No. 1	0.260	250	
Well No. 2	0.324		
Combined Well No. 1 and No. 2	0.584		
Spring	0.351		Grandfathered
Total Withdrawal	0.835		

3.2 Pennsylvania Department of Environmental Protection (DEP)

Copies of all or complete DEP Public Water Supply (PWS) permits were not available for review, so we were unable to confirm specific permit requirements or constraints. Based on the available information, the following summary of the DEP PWS permitting can be provided:

Spring - The EDTMA Engineer has provided the following summary of the Spring permitting status: *"In 2018-2019, Dewberry worked with the Authority to re-apply for a grandfather permit for their spring groundwater source with SRBC. In applying for this permit, coordination with DEP revealed that the current DEP permit for the spring (a 50-year permit) had recently expired. Accurate information for the permit re-application could not be determined until the permit process with SRBC was complete, since a new allocation withdrawal value was being requested. Data also needed to be obtained to determine the flow discharged to the downstream tributary (for which the spring is the main water source) versus how much water was being pumped. Obtaining final approval from SRBC and obtaining data for the spring took until fall of 2019.*

Further research into historical permitting of the spring and current DEP permitting requirements yielded uncertain results. The Spring permit would need to be applied for as a new source, meaning that items such as Engineer's/Geologist's reports, historical data, and water quality testing including a new SWIP test, would be required."

SWIP Testing was conducted in 1996 and DEP did not change the designation of the Spring from groundwater to groundwater under the direct influence of surface water, but concluded that *"there are indications that the spring is at risk of being directly influenced by surface water"*. In addition, EDTMA staff have indicated that there have been turbidity spikes in the Spring associated with rain events in the past.

Well No. 1 – No documented permit status.

Well No. 2 – Permitted pumping rate of 225 gpm.

Nitrate Treatment Plant – Permitted for a maximum flow of 600 gpm and approved for 4-log inactivation of viruses with a minimum entry point free chlorine residual of 0.4 mg/l.

Chlorine Booster Station – Permitted for disinfection in the distribution system.

4.0 ASSETS IN NEED OF IMMEDIATE REPLACEMENT/REPAIR

Immediate replacement/repairs are those expected to be required in the next 1 to 5 years.

4.1 Spring

There does not appear to be a valid DEP PWS permit for the Spring. EDTMA's Engineer has indicated that the Spring will need to be permitted as a new source. It will also be necessary to conduct new SWIP testing of the Spring, and there are indications that the testing could result in the Spring being designated as under the direct influence of surface water. In addition, the following immediate repairs to the Spring are recommended:

- Repair of the cast in place concrete ground floor
- Painting of building surfaces
- Replacement of the main electrical distribution panel

- Replacement of the manual transfer switch and generator disconnect switch
- Install emergency/standby generator to meet DEP uninterrupted system service plan requirements.

4.2 Well No. 1

The following immediate repairs are recommended:

- Confirmation of DEP PWS valid permitting
- Repoint and paint the east wall of building
- Install additional the pipe supports.

4.3 Well No. 2

The following immediate repairs are recommended:

- Inspection and painting of piping and pump discharge head
- Painting of steel doors.

4.4 Nitrate Treatment Plant

In general, much of the treatment equipment at the Nitrate Treatment Plant is nearly 30 years old, shows signs of corrosion and deterioration, and is approaching the end of its expected service life. The following work is expected to be required in the immediate future:

- Refurbishment/replacement of the ion exchange vessels. If the vessels interiors are recoated, it is recommended that the resin be replaced at that time
- Replacement of the ion exchange system controls
- Inspection and painting or replacement of system piping and valves
- Construction of a separate ventilated room/building with secondary containment for chlorine feed and chemical storage
- Replacement of the water softener
- Resolution of the waste brine disposal issues. The current method of addressing clogging of the sanitary sewer system is not expected to be permittable
- Replacement of electrical main breaker
- Replacement of electrical panel PRL#-1.

4.5 Elevated Storage Tanks

The following immediate upgrades are recommended:

- Addition of intrusion detection (switches) on the ladder and hatches on the 300,000 and 100,000 gallon tanks.
- Painting and safety upgrade of 500,000 gallon tank.

4.6 Distribution System

No immediate repair needs have been identified.

4.7 Conceptual Cost Estimates

Concept level cost estimates for the assets in need of immediate replacement/repair are provided on the following page.

5.0 ASSETS IN NEED OF MEDIUM TERM REPLACEMENT/REPAIR

Medium term replacement/repairs are those expected to be required in the next 5 to 10 years.

5.1 Spring

The following medium term repair requirements are expected:

- Replacement of Pump Building roof
- Replacement of older pump.

5.2 Well No. 1

The following medium term repair requirements are expected:

- Painting of pump and piping
- Painting of building exterior
- Replacement of roof
- Replacement of the generator (in good shape, but obsolete and replacement parts will become hard to find).

5.3 Well No. 2

No medium term repair requirements have been identified.

5.4 Nitrate Treatment Plant

The following medium term repair requirements are expected:

- Replacement of the ion exchange resin
- Replacement of the generator (in good shape, but obsolete and replacement parts will become hard to find).

5.5 Elevated Storage Tanks

The following medium term repair requirements are expected:

- Inspection of the 300,000 gallon and 100,000 gallon tanks

5.6 Distribution System

The following medium term repair requirements are expected:

- Replacement of the approximately 10,700 feet of AC pipe installed prior to 1950 on a programmed basis.

EDTMA Condition Assessment
Assets in Need of immediate Repair/Replacement
Conceptual Cost Estimates

Spring		
SWIP testing and permitting	$	50,000
Repair of the cast in place concrete ground floor	$	5,500
Paint building interior	$	2,000
Replace the main electrical distribution panel	$	5,000
Install emergency/standby generator with automatic transfer switch	$	50,000
Well No. 1		
Repoint and paint the east wall of building	$	2,000
Install additional the pipe supports	$	1,000
Well No. 2		
Paint piping and pump discharge head	$	2,000
Paint steel doors	$	500
Nitrate Treatment Plant		
Refurbish/paint ion exchange vessels	$	80,000
Replace resin	$	125,000
Replace ion exchange system controls	$	25,000
Paint system piping and valves	$	30,000
Construct of a fiberglass chemical building with secondary containment	$	100,000
Replace water softener	$	10,000
Add acid metering system to lower pH of waste brine	$	25,000
Replace electrical main breaker	$	5,000
Replace electrical panel PRL#-1	$	5,000
Elevated Storage Tanks		
Add intrusion detection (switches) on the 300,000 and 100,000 gallon tanks	$	10,000
Paint and safety upgrade of 500,000 gallon tank	$	725,000
TOTAL	**$**	**1,258,000**

APPENDIX A

Facility Inspection Form - East Donegal Township Municipal Authority Water System

FACILITY NAME	**Spring**	**TYPE OF FACILITY**	**Water Source**
DATE INSPECTED	**2/18/2020**	**YEAR CONSTRUCTED**	**1948**

ASSET	MAKE	MODEL	YEAR INSTALLED	CONDITION RANKING	COMMENTS	PHOTOS
Pump House Building	-	-	1948	3	725 sq ft block two story building (basement and ground floor). Concrete foundation walls and ground floor. Wood truss roof structure. Asphalt shingle roof. Steel doors require painting. Ground floor is cast in place concrete that appears to be failing in at least one location. Concrete is spalled/cracked and rebar is exposed and corroded.	1,2,3
Mechanical Systems	-	-	1948?	2	Unit heater and exhaust fan on first floor. No heat or ventilation on lower floor.	
Spring Basin Upgrade	-	-	1982	2	Concrete below grade walls. Stone bottom. Block above grade walls. Wood truss roof structure. Asphalt shingle roof.	4,5
Fencing	-	-	?	2	6 ft high fence with 10 ft wide gate.	6
Security System	Select Security	-	?	1	Motion detector, door switches, and lower level flooding switch.	
Pumps (2)	Peerless	-	2009 & 1993	2	Horizontal, direct coupled, 25 HP. Rated at 250 gpm.	7,8
Piping & Valves	-	-	2009	2	No significant corrosion.	9

CONDITION RATING LEGEND				
	5	Unserviceable - Failure is imminent	2	Good - Shows age, but no apparent signs of deterioration
	4	Poor - Shows severe signs of deterioration	1	Excellent - Like new condition
	3	Fair - Shows moderate signs of deterioration		

Facility Inspection Form - East Donegal Township Municipal Authority Water System

FACILITY NAME	**Spring Electrical**	**TYPE OF FACILITY**	**Water Source**
DATE INSPECTED	**2/18/2020**	**YEAR CONSTRUCTED**	**1948**

ASSET	MAKE	MODEL	YEAR INSTALLED	CONDITION RANKING	COMMENTS	PHOTOS
Main Distribution Panel	Square D	QMB Saflex	Unknown	4	400A, 120/240V, 3-phase, 4-wire distribution panelboard showing signs of rusting, replacement parts would be difficult to find. Panel might be original to when structure was added over pump vault.	10
Lighting Panel	Square D	Type NQO Panelboard	Unknown	2	100A MLO panelboard in good condition. Feeds lights, receptacles, SCADA RTU, and instrumentation.	
Disconnect Switch	Square D	Series 1	Unknown	4	300A disconnect switch showing severe signs of rust. Nothing is connected to switch and is therefore out of service. Disconnect may be original to when structure was added over pump vault.	
Manual Transfer Switch	General Electric	Enclosed switch MTS	Unknown	4	MTS is showing severe signs of rust. Generator has been removed and therefore the emergency side of the switch is out of service. However, normal power might still be running through normal side of switch. MTS may be original to when structure was added over pump vault.	11
Generator Disconnect	General Electric	Model 1	Unknown	4	Disconnect switch for a generator. Showing severe signs of rust. The generator was removed so therefore the switch is out of service. Disconnect may be original to when structure was added over pump vault.	11
Pump 1 Disconnect	Square D	Safety Switch	Unknown	2	Disconnect switch for pump 1 in good condition. May have been replaced when pump 1 was replaced in 2009.	

Pump 2 Disconnect	General Electric	Enclosed Circuit Breaker	Unknown	2	Enclosed circuit breaker for pump 2 in good condition. Appears to be older than disconnect for pump 1 and is labeled as feeding a 25HP pump. Breaker frame was not able to be determined and may be obsolete.	
SCADA RTU	Built by Tri-Star Inc	Various Components	2000	2	Panel exterior shows a few spots of paint chipping and deterioration, but all internal components are like new. Panel houses Allen Bradley MicroLogix PLC and MDS Radio for communication as well as miscellaneous control components. Components may become obsolete in the near future.	
Conduit System	Various	Various	Various	2	Conduit throughout the building is aging, but shows no signs imminent problems.	

CONDITION RATING LEGEND	5	Unserviceable - Failure is imminent	2	Good - Shows age, but no apparent signs of deterioration
	4	Poor - Shows severe signs of deterioration	1	Excellent - Like new condition
	3	Fair - Shows moderate signs of deterioration		

SPRING PHOTOS

Photo 1

Photo 2

Photo 3

Photo 4

Photo 5

Photo 6

Photo 7

Photo 8

Photo 9

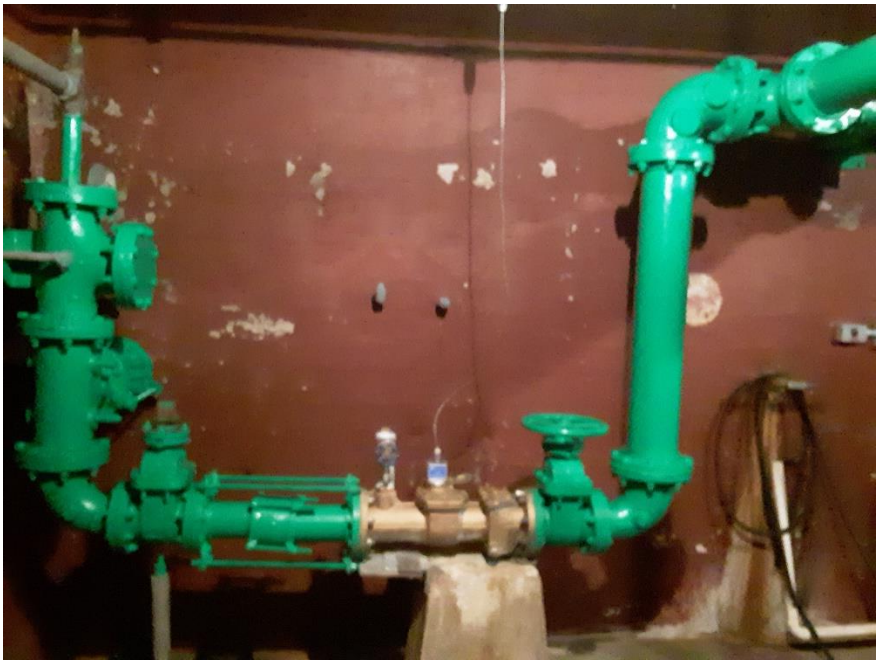
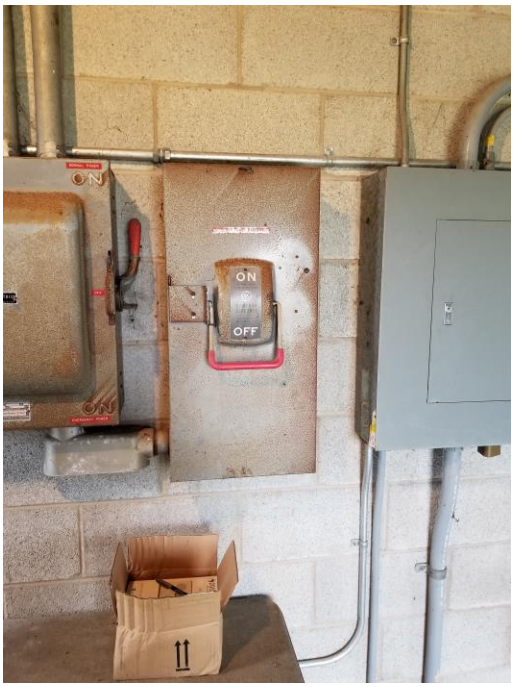


Photo 10

Photo 11



APPENDIX B

Facility Inspection Form - East Donegal Township Municipal Authority Water System

FACILITY NAME	**Well No. 1**	**TYPE OF FACILITY**	**Water Source**
DATE INSPECTED	**2/18/2020**	**YEAR CONSTRUCTED**	**1981**

ASSET	MAKE	MODEL	YEAR INSTALLED	CONDITION RANKING	COMMENTS	PHOTOS
Building	-	-	1981	3	988 sq ft building is attached to Municipal Building. 728 sq ft storage area/generator room and 260 sq ft pump room. Common wall with Municipal storage building. Block building with wood truss roof structure. Roof is 1/2 metal, 1/2 asphalt shingle. Block on east wall shows joint cracks and possible water/moisture damage. Prior repair on north wall is evident.	1,2,3,4,5
Mechanical Systems	-	-	1981	2	Unit heater and exhaust fan.	
Security System	Select Security	-	?	1	Motion detector, door switches and fire alarm	
Pump	Peerless	8MA - 11 stage, 30 HP motor	Pump-2012 Motor-1981	2	Line shaft vertical turbine pump. New pump and column pipe installed in 2012. Motor is original. Rated at 250 gpm. Provided with pre-lube system.	6
Piping & Valves	-	-	1981	3	Additional pipe supports are suggested.	7
Well	Drilled by Eichelberger	-	1980	Unknown	8 inch steel casing to approx. 97 ft. Depth of well indicated to be 492 ft on drilling log. Pump set at 207 ft.	

CONDITION RATING LEGEND				
	5	Unserviceable - Failure is imminent	2	Good - Shows age, but no apparent signs of deterioration
	4	Poor - Shows severe signs of deterioration	1	Excellent - Like new condition
	3	Fair - Shows moderate signs of deterioration		

Facility Inspection Form - East Donegal Township Municipal Authority Water System

FACILITY NAME	**Well No. 1**	**TYPE OF FACILITY**	**Water Well**
DATE INSPECTED	**2/18/2020**	**YEAR CONSTRUCTED**	**1981**

ASSET	MAKE	MODEL	YEAR INSTALLED	CONDITION RANKING	COMMENTS	PHOTOS
Panel P	Cutler Hammer	Class CTL Panelboard	1981	2	200A, 120/208V, 3-phase, 4-wire distribution panelboard with main circuit breaker in good condidtion. Feeds power to all equipment in the well house. Breaker frame types were not able to be determined and may be obsolete.	
Generator	Martin Electric Plants	125kW	1986	2	125kW/156kVA standby diesel generator in good condition. Generator has two output circuit breakers, one for well station and the other for the township building, which has been disconnected. Fuel is feed from 500 gallon diesel tank located within building. Generator is ran monthly and serviced yearly under a service contract. Generator is obsolete and replacement parts will be hard to find.	8
Manual Transfer Switch	Meter-Rite	Transfer Switch	1986	2	Manual transfer switch in good condition. Used to manually switch well house power to generator.	
Pump Starter	Cutler Hammer	CH Control	1981	2	Combination Pump Starter that provides power to the well pump in good shape. Starter is obsolete and replacement parts will be hard to find.	
Pump Control Panel	AutoCon Industries	Various Components	1981	2	Original Pump Control Panel with status lights and pump relay controls showing signs of paint deterioration on the outside of the panel. Panel may still be in use for status and control passed to newer SCADA RTU.	

SCADA RTU	Built by Tri-Star Inc	Various Components	2000	2	Panel exterior shows a few spots of paint chipping and deterioration, but all internal components are like new. Panel houses Allen Bradley MicroLogix PLC and MDS Radio for communication as well as miscellaneous control components. Components may become obsolete in the near future.	
Conduit System	Various	Various	Various	2	Conduit throughout the building is aging, but shows no signs imminent problems.	

CONDITION RATING LEGEND	5	Unserviceable - Failure is imminent	2	Good - Shows age, but no apparent signs of deterioration
	4	Poor - Shows severe signs of deterioration	1	Excellent - Like new condition
	3	Fair - Shows moderate signs of deterioration		

WELL NO. 1 PHOTOS

Photo 1

Photo 2

Photo 3

Photo 4

Photo 5

Photo 6

Photo 7

Photo 8

APPENDIX C

Facility Inspection Form - East Donegal Township Municipal Authority Water System

FACILITY NAME	**Well No. 2**	**TYPE OF FACILITY**	**Water Source**
DATE INSPECTED	**2/18/2020**	**YEAR CONSTRUCTED**	**2001**

ASSET	MAKE	MODEL	YEAR INSTALLED	CONDITION RANKING	COMMENTS	PHOTOS
Building	-	-	2001	2	330 sq ft block and brick building. Asphalt shingle roof. Steel doors require painting.	1,2
Mechanical Systems	-	-	2001	2	Unit heater and exhaust fan.	
Fencing	-	-	?	2	6 ft high fence with 25 ft wide automatic opening gate.	3
Security System	Select Security	-	?	1	Motion detector and door switches.	
Pump	Crane-Deming?	-	Pump-2005 Motor-2001	3	Line shaft vertical turbine pump. Appears that a new pump was installed in 2005. 40 HP motor and discharge head appear to be original. Discharge head is rusting. Rated for 225 gpm at 80% speed. Provided with a VFD. No pre-lube system.	4,5
Piping & Valves	-	-	2001	3	Piping insulated. Exposed valves show rust - require painting.	6
Well	Completed by Kohler Well Drilling	-	1997-1998	Unknown	Well drilled to 309 ft. Then backfilled with cement grout to depth of 168.5 ft to isolate zones producing high TDS water. 8 inch steel casing to approx. 90 ft. Pump set at 120 ft.	

CONDITION RATING LEGEND	5	Unserviceable - Failure is imminent	2	Good - Shows age, but no apparent signs of deterioration
	4	Poor - Shows severe signs of deterioration	1	Excellent - Like new condition
	3	Fair - Shows moderate signs of deterioration		

Facility Inspection Form - East Donegal Township Municipal Authority Water System

FACILITY NAME	**Well 2 Electrical**	**TYPE OF FACILITY**	**Water Source**
DATE INSPECTED	**2/18/2020**	**YEAR CONSTRUCTED**	**2001**

ASSET	MAKE	MODEL	YEAR INSTALLED	CONDITION RANKING	COMMENTS	PHOTOS
Panel H	Square D	NF Panelboard	2001	1	200A, 480V, 3-phase, 4-wire distribution panelboard with main circuit breaker in great condition. Feeds power to the normal side of the ATS as well as a unit heater that isn't backed-up by the generator.	
Panel P	Square D	NF Panelboard	2001	1	225A, 480V, 3-phase, 4-wire MLO distribution panelboard in great condition. Feeds power to well pump and low voltage panelboard via transformer. Panel is fed from the load side of the ATS and therefore all loads in this panel are backed-up by the generator.	
Transformer	Square D	General Purpose Transformer	2000	2	480V - 120/240V, 1-phase 7.5kVA transformer in good condition. Transforms power for use by 120/240V panelboard. Has a few small dents in the cover.	
Panel R	Square D	NQOD Panelboard	2000	1	100A, 120/240V, 1-phase, 3-wire lighting panelboard with main breaker in great condition. Feeds power to lighting, receptacles, instrumentation, and generator appurtenances.	
Generator	Cummins Onan	GGHC 80kW	2001	1	80kW/100kVA standby propane generator in great condition. Propane is feed from two (2) 1000 gallon propane tanks located exterior to the building. Generator is ran weekly and serviced yearly under a service contract. Generator is obsolete and replacement parts will be hard to find.	
Auto Transfer Switch	Cummins Onan	LTD	2001	1	Automatic Transfer Switch in great condition. Automatically transfers power to generator well utility power is lost.	
Well VFD	Schneider Electric	Altivar 61	2015	1	Variable Frequency Drive that provides power to the well (when selected) in great shape. VFD can vary the speed at which the well pump runs.	

VFD Disconnect	Square D	Heavy Duty Enclosed Switch	2001	2	Disconnect Switch in good condition. Enlosure beginning to show the first signs or rust.	
Manual Transfer Switch	Square D	Double Throw Safety Switch	2015	1	Manual transfer switch in great condition. Used to select whether combination starter of VFD is used to power the well pump. Was installed when VFD was replaced so that combination starter could power the pump while VFD was unavailable.	
Combination Starter	Furnas	Various Components	2001	2	Combination Pump Starter that provides power to the well (when selected) in good shape. Outer enclosure beginning to show minor signs of deterioration.	
SCADA RTU	Built by Tri-Star Inc	Various Components	2001	2	Panel exterior shows a few spots of paint chipping and deterioration, but all internal components are like new. Panel houses Allen Bradley MicroLogix PLC and MDS Radio for communication as well as miscellaneous control components. Components may become obsolete in the near future.	7
Conduit System	Various	Various	Various	2	Conduit throughout the building is aging, but shows no signs imminent problems.	

CONDITION RATING LEGEND	5	Unserviceable - Failure is imminent	2	Good - Shows age, but no apparent signs of deterioration
	4	Poor - Shows severe signs of deterioration	1	Excellent - Like new condition
	3	Fair - Shows moderate signs of deterioration		

WELL NO. 2 PHOTOS

Photo 1

Photo 2

Photo 3

Photo 4

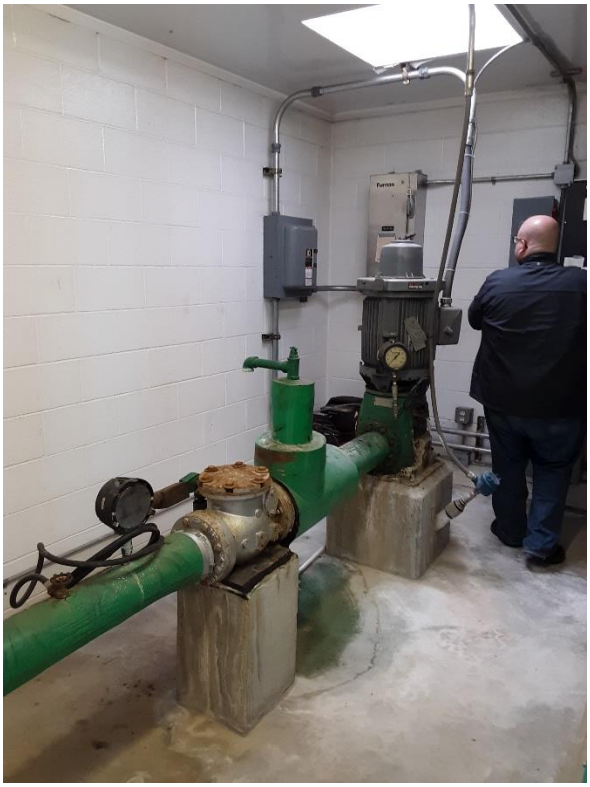


Photo 5

Photo 6

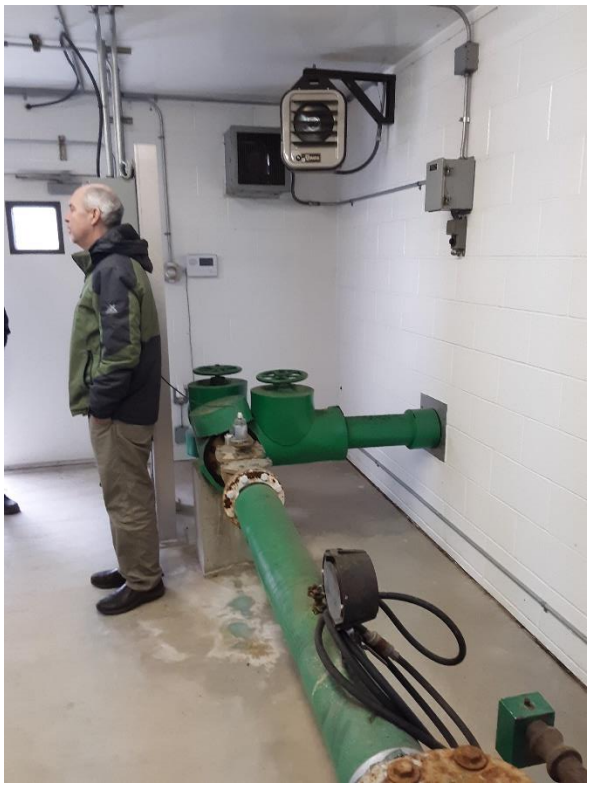
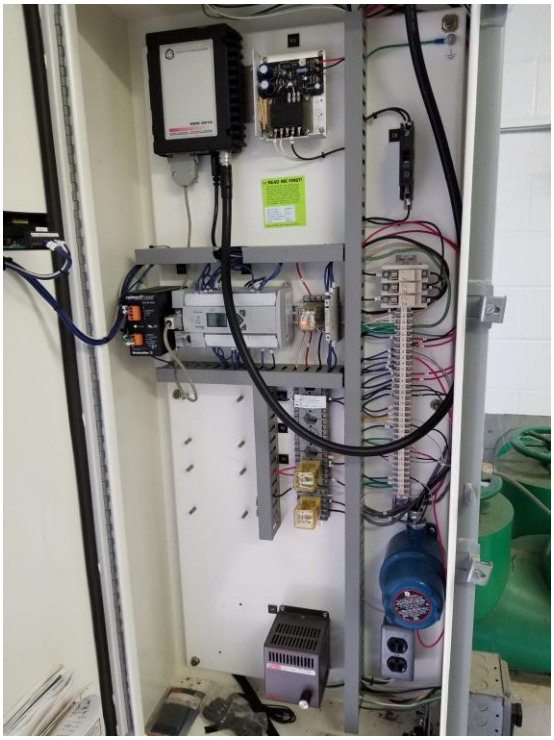


Photo 7



APPENDIX D

Facility Inspection Form - East Donegal Township Municipal Authority Water System

FACILITY NAME	**Nitrate Treatment Plant**	**TYPE OF FACILITY**	**Treatment Facility**
DATE INSPECTED	**2/18/2020**	**YEAR CONSTRUCTED**	**1990**

ASSET	MAKE	MODEL	YEAR INSTALLED	CONDITION RANKING	COMMENTS	PHOTOS
Building	-	-	1990 Office-2001	2	820 sq ft block and brick building with 160 sq ft office and asphalt shingle roof. New roof, gutters, and downspouts in 2015.	1,2
Fencing	-	-	2018	1	6 ft high fence with 20 ft wide gate.	3
Security System	Select Security	-	2017	2	Motion detector, door switches and fire alarm.	
Ion Exchange System	Refinite Water Aquamatic Diaphragm Valves	7 ft diameter steel pressure vessels. Steel piping with pneumatic control valves. Purolite A300E strong base anion exchange resin	2 units-1990 1 unit-2001	4	Vessels and piping is insulated, but significant corrosion is present on the legs of vessels and all exposed piping and valves. Surfaces under the insulation were not visible. Older vessels and resin have exceeded the expected service life without refurbishment/replacement. Typical service life for resins is 15 years, but the resin was tested in 2017 and found to be in good condition.	4,5,6,7
Ion Exchange System Controls	SeaFlow Flow Meter Hays Bypass Flow Meter Aquamatic Stager Unknown Programmable Controller		1990	3	Flow meters and transmitter are in acceptable condition. Stager controls are exposed and corroded. Controls may be approaching the end of expected service life.	8,9
Chemical Storage and Feed	-	-	Feed pumps average 5 years old	2	Five sodium hypochlorite feed pumps and 3 day tanks. Hydrochloric acid and sodium hypochlorite stored in drums with no secondary containment. Sodium hypochlorite should be stored in a separate ventilated room.	10,11
Salt Storage Tanks (2)	-	Both 10 ft diameter 25 ton and 30 ton	25 ton-1990 30 ton-2001	2	FRP tanks. Wet section and piping insulated.	12
Waste Holding Tank	-	-	1990	Unknown	3 ft-6 inch deep cast in place concrete holding tank under treatment room floor. Approx. 15,000 gallon capacity. Adequate for 2 regeneration cycles. Gravity drain to sanitary sewer.	13

Water Softener	Kisco	KS-390-1	1990	Unknown	Galvanized steel vessel. Insulated, so condition not known. May be approaching the end of expected service life.	14
Air Compressors (2)	Speed Air	3/4 HP	2016 & 2018	2	Portable compressor/receiver connected with hose.	15
Brine Tank	-	600 gallon	1990	3	4 ft diameter FRP tank.	
Buried Chlorine Contact Tanks	-	7000 gal 4,000 gal 6,000 gal	1981 1989 1999	Unknown	Condition Unknown.	

CONDITION RATING LEGEND	5	Unserviceable - Failure is imminent	2	Good - Shows age, but no apparent signs of deterioration
	4	Poor - Shows severe signs of deterioration	1	Excellent - Like new condition
	3	Fair - Shows moderate signs of deterioration		

Facility Inspection Form - East Donegal Township Municipal Authority Water System

FACILITY NAME	Nitrate Treatment Plant Electrical	TYPE OF FACILITY	Water Treatment
DATE INSPECTED	2/18/2020	YEAR CONSTRUCTED	1990

ASSET	MAKE	MODEL	YEAR INSTALLED	CONDITION RANKING	COMMENTS	PHOTOS
Main Breaker	Square D	Enclosed Circuit Breaker	1991	4	200A enclosed main circuit breaker in poor condition. Breaker is the main disconnecting means for the whole facility. Panel has been damaged by the corrosive chemicals stored in the area.	16
PRL#-1	Challenger	PowerMaster	1991	5	200A, 120/240V, 1-phase, 3-wire panelboard in poor condition. Feeds power to lighting, receptacles, instrumentation, and heaters but is not backed up by the generator. Panel has been damaged by the corrosive chemcials stored in the area. Challenger panelboards are notorious for failures, and should be replaced as soon as possible.	16
Tank Control Panel	Not Listed	Various Components	1991	3	Control Panel for the facility that controls regeneration cycles. Panel has been damaged by the corrosive chemcials stored in the area, but is in better shape than the adjaced Main Breaker and Panelboard.	16
Panel A	Square D	NQOD Panelboard	2000	1	100A, 120/240V, 1-phase, 3-wire panelboard with main breaker in great condition. Feeds power to lighting, receptacles, instrumentation, and generator appurtenances. Equipment on this panel is backed-up by the generator.	
Generator	Cummins Onan	20GGBD	2000	3	20kW/25kVA standby propane exterior generator in good condition. Outer Enclosure is showing signs of rusting. Propane is feed from 500 gallon propane tank located next to Generator. Generator is run weekly and serviced yearly under a service contract. Generator is obsolete and replacement parts will be hard to find.	17

Auto Transfer Switch	Cummins Onan	LT	2000	1	Automatic Transfer Switch in great condition. Automatically transfers power to generator well utility power is lost.	
SCADA RTU	Built by Tri-Star Inc	Various Components	2000	2	SCADA RTU Panel. Panel houses Allen Bradley MicroLogix PLC and MDS Radio for communication as well as miscellaneous control components. Components may become obsolete in the near future.	
Conduit System	Various	Various	Various	2	Conduit throughout the building is aging, but shows no signs immanent problems with the exception of the conduits above the Main Breaker and PRL#-1, which should be replaced with panels are replaced.	16

CONDITION RATING LEGEND	5	Unserviceable - Failure is imminent	2	Good - Shows age, but no apparent signs of deterioration
	4	Poor - Shows severe signs of deterioration	1	Excellent - Like new condition
	3	Fair - Shows moderate signs of deterioration		

NITRATE TREATMENT PLANT PHOTOS

Photo 1

Photo 2

Photo 3

Photo 4

Photo 5

Photo 6

Photo 7

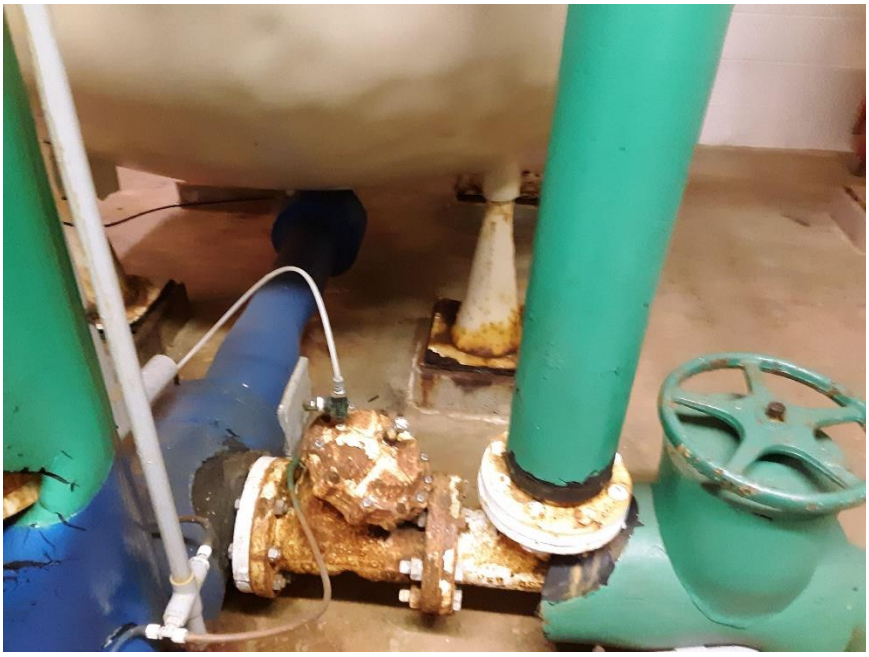


Photo 8

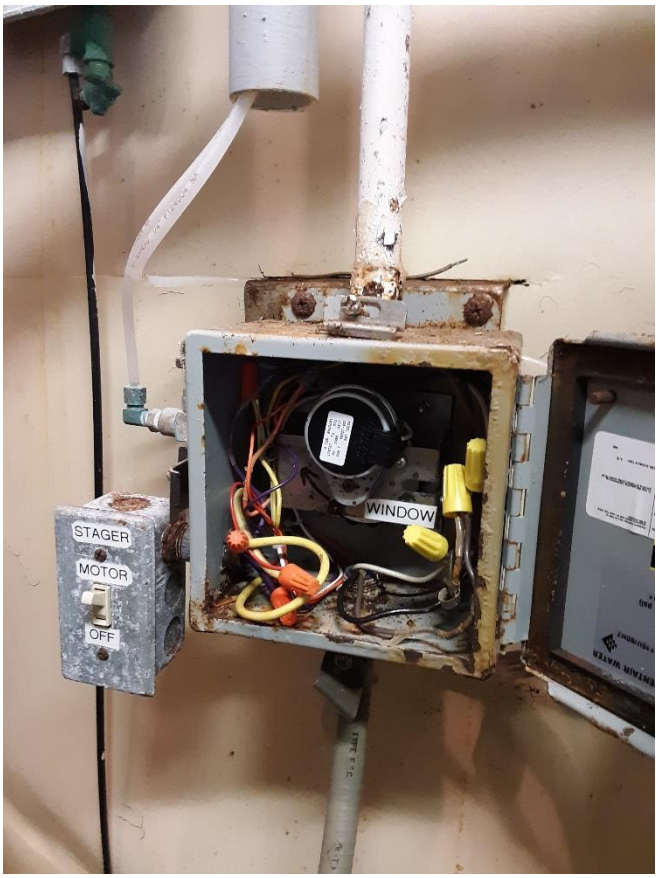


Photo 9

Photo 10

Photo 11

Photo 12

Photo 13

Photo 14

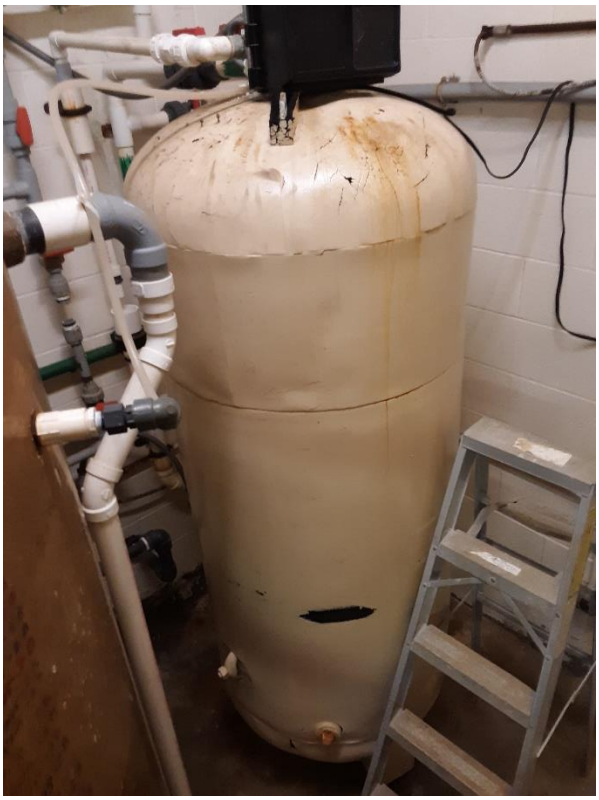


Photo 15

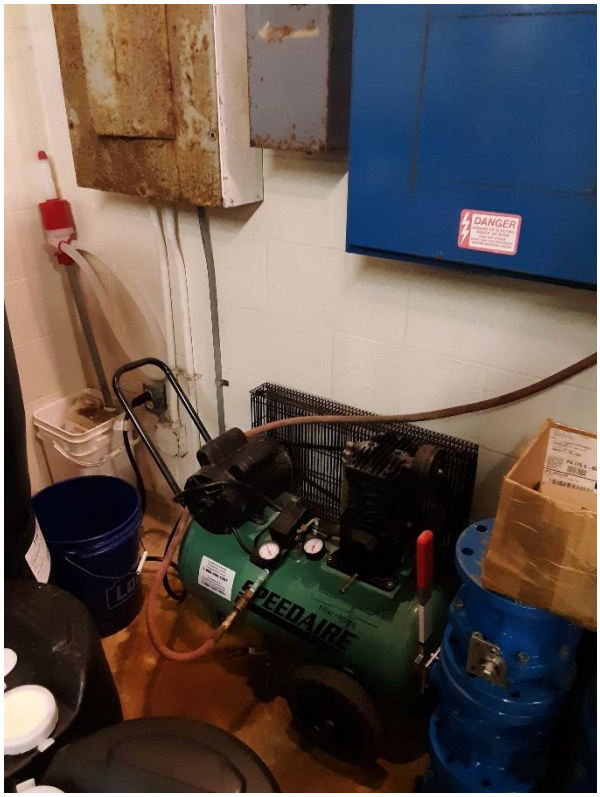


Photo 16

Photo 17

APPENDIX E

Facility Inspection Form - East Donegal Township Municipal Authority Water System

FACILITY NAME	**Elevated Tanks**	**TYPE OF FACILITY**	**Storage Tanks**
DATE INSPECTED	**2/18/2020**	**YEAR CONSTRUCTED**	**See Below**

ASSET	MAKE	MODEL	YEAR INSTALLED	CONDITION RANKING	COMMENTS	PHOTOS
100,000 Gallon Elevated Storage Tank	Pittsburg Tank	86 ft high multi-column	1948	2	Re-painted in 2001. No significant signs of corrosion on exterior paint. No apparent structural concerns noted. Ladder has gate with lock. No intrusion detection or video surveillance.	3
300,000 Gallon Elevated Storage Tank	Caldwell Tanks	86 ft high multi-column	1982	2	Re-painted in 2001. No significant signs of corrosion on exterior paint. No apparent structural concerns noted. Ladder has gate with lock. No intrusion detection or video surveillance.	1,2
500,000 Gallon Elevated Tank	Pitt-Des Moines, Inc.	144 ft high fluted column	1999	3	Tank Inspected in 2015. Multiple OSHA and safety deficiencies noted. Several cracked welds at base plates were also noted. These may have been repaired. Inspection report indicated that wetted interior of tank should have been repainted by 2018. Exterior should be painted when interior is painted. Select Security door switch and motion detector in tank base. No video surveillance. Piping in tank base is in an enclosed heated/insulated room. Piping is partially insulated (poor condition).	4,5,6,7

CONDITION RATING LEGEND	5	Unserviceable - Failure is imminent	2	Good - Shows age, but no apparent signs of deterioration
	4	Poor - Shows severe signs of deterioration	1	Excellent - Like new condition
	3	Fair - Shows moderate signs of deterioration		

Facility Inspection Form - East Donegal Township Municipal Authority Water System

FACILITY NAME	**500,000 Gallon Tank**	**TYPE OF FACILITY**	**Water Storage**
DATE INSPECTED	**2/18/2020**	**YEAR CONSTRUCTED**	**1999**

ASSET	MAKE	MODEL	YEAR INSTALLED	CONDITION RANKING	COMMENTS	PHOTOS
Power Panel	Square D	Series S1	1999	2	100A, 120/240, 1-phase, 3-wire distribution panelboard with main circuit breaker in good condition. Feeds power to all authority owned equipment within tank structure. Labels are dirty, but enclosure shows no signs of rust.	8
SCADA RTU	Built by Tri-Star Inc	Various Components	2000	2	Panel exterior shows a few spots of paint chipping and deterioration, but all internal components are like new. Panel houses Allen Bradley MicroLogix PLC and MDS Radio for communication as well as miscellaneous control components. Components may become obsolete in the near future.	
Conduit System	Various	Various	Various	2	Conduit throughout the tank structure is aging, but shows no signs imminent problems.	

CONDITION RATING LEGEND	5	Unserviceable - Failure is imminent	2	Good - Shows age, but no apparent signs of deterioration
	4	Poor - Shows severe signs of deterioration	1	Excellent - Like new condition
	3	Fair - Shows moderate signs of deterioration		

ELEVATED TANK PHOTOS

Photo 1

Photo 2

Photo 3

Photo 4

Photo 5

Photo 6

Photo 7

Photo 8

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9. To the extent not provided in the Condition Assessment, please provide any information that Columbia Water has about the Authority's compliance with DEP requirements in 2019, 2020 and 2021 and how any non-compliance was resolved.

Response:

Attached is the Authority's DEP compliance history. The report indicates compliance has been achieved for all violations by completing the necessary sampling and reporting.

*** PWSID = 7360083 | SYSTEM NAME = EAST DONEGAL TOWNSHIP ***
*** SystemType = COMMUNITY | DEP REGION - SOUTHCENTRAL ***
*** eFACTS SiteID= 450564 ***

Violation Information for Federal Fiscal Years 2017 through 2021

Contaminant ID	Sample Point ID	Violation ID	Violation Type	Sample Type	Violation Awareness Date	Compliance Value	Enforcement Action 1	Enforcement Action 2	Enforcement Action 3	Enforcement Action 4	Enforcement Action 5	Enforcement Action 6	Fiscal Year
HALOACETIC ACIDS (FIVE)		17854	FAILURE TO MONITOR OR REPORT FOR THE D/DBP CONTAMINANT SPECIFIED		04/26/2021	.	VIOLATION NOTICE	PUBLIC NOTICE REQ	NOTICE OF VIOLATION	COMPLIANCE ACHIEVED			2021
HALOACETIC ACIDS (FIVE)		13132	FAILURE TO ISSUE TIER 3 PUBLIC NOTIFICATION		02/24/2021	.	VIOLATION NOTICE	COMPLIANCE ACHIEVED					2021
TRIHALOMETHANES		13133	FAILURE TO ISSUE TIER 3 PUBLIC NOTIFICATION		02/24/2021	.	VIOLATION NOTICE	COMPLIANCE ACHIEVED					2021
DI (2-ETHYLHEXYL) PHTHALATE (S	100	13134	FAILURE TO ISSUE TIER 3 PUBLIC NOTIFICATION	ENTRY POINT	02/24/2021	.	VIOLATION NOTICE	COMPLIANCE ACHIEVED					2021
ATRAZINE (SOC)	100	13135	FAILURE TO ISSUE TIER 3 PUBLIC NOTIFICATION	ENTRY POINT	02/24/2021	.	VIOLATION NOTICE	COMPLIANCE ACHIEVED					2021
DI (2-ETHYLHEXYL) PHTHALATE (S	100	11157	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	01/23/2020	.	VIOLATION NOTICE	PUBLIC NOTICE REQ	NOTICE OF VIOLATION	COMPLIANCE ACHIEVED			2020
ATRAZINE (SOC)	100	11158	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	01/23/2020	.	VIOLATION NOTICE	PUBLIC NOTICE REQ	NOTICE OF VIOLATION	COMPLIANCE ACHIEVED			2020
ENDRIN (SOC)	100	44124	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
LINDANE (SOC)	100	44125	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
METHOXYCHLOR (SOC)	100	44126	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
TOXAPHENE (SOC)	100	44127	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
DALAPON (SOC)	100	44128	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
DIQUAT (SOC)	100	44129	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
ENDOTHALL (SOC)	100	44130	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
GLYPHOSATE (SOC)	100	44131	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
DI (2-ETHYLHEXYL) ADIPATE (SOC	100	44132	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
OXYMAL (VYDATE) (SOC)	100	44133	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
SIMAZINE (SOC)	100	44134	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
PICLOREM (SOC)	100	44135	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
DINOSEB (SOC)	100	44136	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
HEXACHLOROCYCLOPENTADIENE(SOC)	100	44137	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
CARBOFURAN (SOC)	100	44138	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
ALACHLOR (SOC)	100	44139	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
2,3,7,8-TCDD (DIOXIN) (SOC)	100	44140	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
HEPTACHLOR (SOC)	100	44141	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
HEPTACHLOR EPOXIDE (SOC)	100	44142	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
2,4 - D (SOC)	100	44143	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
2,4,5 - TP SILVEX (SOC)	100	44144	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
HEXACHLOROBENZENE (SOC)	100	44145	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020

*** PWSID = 7360083 | SYSTEM NAME = EAST DONEGAL TOWNSHIP ***
*** SystemType = COMMUNITY | DEP REGION - SOUTHCENTRAL ***
*** eFACTS SiteID= 450564 ***

Violation Information for Federal Fiscal Years 2017 through 2021

Contaminant ID	Sample Point ID	Violation ID	Violation Type	Sample Type	Violation Awareness Date	Compliance Value	Enforcement Action 1	Enforcement Action 2	Enforcement Action 3	Enforcement Action 4	Enforcement Action 5	Enforcement Action 6	Fiscal Year
BENZO(A)PYRENE (SOC)	100	44146	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
PENTACHLOROPHENOL (SOC)	100	44147	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
PCBS (SOC)	100	44148	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
1,2-DIBROMO,3-CHLOROPROP(SOC)	100	44149	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
ETHYLENE DIBROMIDE (EDB) (SOC)	100	44150	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
CHLORDANE (SOC)	100	44151	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
HALOACETIC ACIDS (FIVE)		11155	FAILURE TO MONITOR OR REPORT FOR THE D/DBP CONTAMINANT SPECIFIED		01/23/2020	.	VIOLATION NOTICE	PUBLIC NOTICE REQ	NOTICE OF VIOLATION	COMPLIANCE ACHIEVED			2020
TRIHALOMETHANES		11156	FAILURE TO MONITOR OR REPORT FOR THE D/DBP CONTAMINANT SPECIFIED		01/23/2020	.	VIOLATION NOTICE	PUBLIC NOTICE REQ	NOTICE OF VIOLATION	COMPLIANCE ACHIEVED			2020
TRIHALOMETHANES		44123	FAILURE TO MONITOR OR REPORT FOR THE D/DBP CONTAMINANT SPECIFIED		10/20/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
REVISED TOTAL COLIFORM RULE		31373	FAILURE TO PROPERLY COLLECT OR ANALYZE RTCR ROUTINE SAMPLES	DISTRIBUTION	07/24/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
REVISED TOTAL COLIFORM RULE		37068	FAILURE TO PROPERLY COLLECT OR ANALYZE RTCR ROUTINE SAMPLES	DISTRIBUTION	08/26/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
CHLORINE		37069	R3	DISTRIBUTION	08/26/2020	.	REPORTING ERROR	COMPLIANCE ACHIEVED					2020
PCBS (SOC)	100	17975	FAILURE TO ISSUE TIER 3 PUBLIC NOTIFICATION	ENTRY POINT	05/23/2018	.	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED					2018
2,3,7,8-TCDD (DIOXIN) (SOC)	100	19245	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	04/26/2017	.	VIOLATION NOTICE	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
PCBS (SOC)	100	19246	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	04/26/2017	.	VIOLATION NOTICE	PUBLIC NOTICE REQ	COMPLIANCE ACHIEVED				2017
ENDRIN (SOC)	100	37340	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
LINDANE (SOC)	100	37341	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
METHOXYCHLOR (SOC)	100	37342	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
DI (2-ETHYLHEXYL) ADIPATE (SOC	100	37343	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
OXYMAL (VYDATE) (SOC)	100	37344	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
SIMAZINE (SOC)	100	37345	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
HEXACHLOROCYCLOPENTADIENE(SOC)	100	37346	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
CARBOFURAN (SOC)	100	37347	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
ALACHLOR (SOC)	100	37348	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
2,3,7,8-TCDD (DIOXIN) (SOC)	100	37349	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
HEPTACHLOR (SOC)	100	37350	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
HEPTACHLOR EPOXIDE (SOC)	100	37351	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
HEXACHLOROBENZENE (SOC)	100	37352	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
BENZO(A)PYRENE (SOC)	100	37353	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017

*** PWSID = 7360083 | SYSTEM NAME = EAST DONEGAL TOWNSHIP ***
*** SystemType = COMMUNITY | DEP REGION - SOUTHCENTRAL ***
*** eFACTS SiteID= 450564 ***

Violation Information for Federal Fiscal Years 2017 through 2021

Contaminant ID	Sample Point ID	Violation ID	Violation Type	Sample Type	Violation Awareness Date	Compliance Value	Enforcement Action 1	Enforcement Action 2	Enforcement Action 3	Enforcement Action 4	Enforcement Action 5	Enforcement Action 6	Fiscal Year
1,2-DIBROMO,3-CHLOROPROP(SOC)	100	37354	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
ETHYLENE DIBROMIDE (EDB) (SOC)	100	37355	FAILURE TO MONITOR/REPORT ROUTINE SAMPLES FOR CONTAM. SPECIFIED	ENTRY POINT	10/18/2017	.	NOTICE OF VIOLATION	PUBLIC NOTICE REQ	PUBLIC NOTICE ISSUED	COMPLIANCE ACHIEVED			2017
CHLORINE		37336	FAILURE TO MONITOR OR REPORT FOR THE D/DBP CONTAMINANT SPECIFIED	DISTRIBUTION	10/18/2017	.	REPORT RECEIVED LATE	COMPLIANCE ACHIEVED					2017
HALOACETIC ACIDS (FIVE)		37337	FAILURE TO MONITOR OR REPORT FOR THE D/DBP CONTAMINANT SPECIFIED		10/18/2017	.	REPORT RECEIVED LATE	COMPLIANCE ACHIEVED					2017
TRIHALOMETHANES		37338	FAILURE TO MONITOR OR REPORT FOR THE D/DBP CONTAMINANT SPECIFIED		10/18/2017	.	REPORT RECEIVED LATE	COMPLIANCE ACHIEVED					2017
REVISED TOTAL COLIFORM RULE		37339	FAILURE TO PROPERLY COLLECT OR ANALYZE RTCR ROUTINE SAMPLES	DISTRIBUTION	10/18/2017	.	REPORT RECEIVED LATE	COMPLIANCE ACHIEVED					2017

10. Please identify and discuss what capital investment Columbia Water anticipates making in the acquired system during the first 10 years post-acquisition.

Response:

The assets needing capital investment are identified in the Condition Assessment report. Columbia Water Company anticipates addressing these items during the first 10 years post-acquisition. Columbia Water Company also anticipates replacing the customer water meters during the first 10 years post-acquisition.

11. The Purchase Agreement states that Columbia Water will assume a wastewater agreement between the Authority and East Donegal Sewer authority dated May 21, 1990, please explain how the agreement relates to Columbia Water's provision of water service to the acquired system.

Response:

The agreement is a service agreement that allows the Authority to discharge backwash waste from the Nitrate Plant into the public sewer. Columbia Water Company will need continue that practice if it acquires the Authority's water system. Attached is the May 21, 1990 agreement.

1

(WASTE WATER)

A G R E E M E N T

This Agreement is made this 21st day of May, 1990, by and between the EAST DONEGAL SEWER AUTHORITY ("EDSA") and the EAST DONEGAL TOWNSHIP MUNICIPAL AUTHORITY ("EDTMA") upon the following terms and conditions:

1. EDTMA proposes to install nitrate ion exchange treatment units at its facilities located in East Donegal Township, Lancaster County, Pennsylvania, anticipating approximately 7,400 gallons of backwash waste water to be produced on a daily basis of operation.

2. Such waste water is expected to contain approximately 940 pounds of sodium chlorides, 123 pounds of sodium nitrates, 80 pounds of sodium sulfates and a small amount of sodium bicarbonate.

3. EDTMA proposes to discharge such waste water by means of a six-inch (6") diameter lateral from the proposed treatment building located behind the two existing elevated storage tanks on Jacob Street, Maytown, Lancaster County, Pennsylvania to an existing manhole located on Jacob Street.

4. This connection would result in such waste water being carried by means of the existing EDSA sanitary sewer system to the treatment plant of the Marietta Donegal Joint Authority ("MDJA") for treatment.

5. EDTMA has requested confirmation from MDJA that it will accept such waste water for treatment at its plant.

6. EDSA is willing to transport such waste water for treatment upon the following terms and conditions:

A. This Agreement is contingent upon approval by the Marietta Donegal Joint Authority of an agreement to treat such waste.

B. The maximum discharge rate from the brine waste holding tank to the sewer system shall not exceed eleven (11) gallons per minute. Discharge from the brine waste holding tank shall only occur after the entire treatment system regeneration sequence has been completed, providing maximum dilution of the brine wastes being stored.

C. The EDTMA lateral hook-up to the EDSA system shall be at Manhole #610 located on Jacob Street, Maytown.

D. EDTMA and EDSA acknowledge that the waste water to be transported by EDSA from the EDTMA nitrate treatment system is of a nature significantly different from the ordinary household sewage and other waste waters generally transported through the EDSA system. Should the transportation of this waste water by EDSA result in any special equipment needs or maintenance, any special or additional treatment or any limitation on the manner in which materials are transported by the EDSA system, EDSA, in its sole discretion, reserves the right to vary the charges made to EDTMA to reflect the additional costs resulting from the acceptance and transportation of this waste water. EDSA shall give prompt notice to EDTMA of any problems arising from the acceptance and treatment of this waste water.

EDTMA shall have sixty (60) days within which to cure any such problems before EDSA implements any varied costs or additional conditions on the acceptance of this waste.

E. EDTMA shall pay a connection fee of Two Thousand Dollars ($2,000.00) to EDSA. Additionally, the EDTMA shall pay all costs involved in the installation and connection of lateral hook-up to the EDSA system.

F. For the purposes of this Agreement, an E.D.U. shall be defined as 350 gallons/day. EDTMA shall pay to EDSA on a quarterly basis a rental charge of $47.50/E.D.U. per quarter, representing the transportation and treatment charge regularly assessed by the EDSA. This charge may increase from time to time subject to the Rules and Regulations of EDSA regarding rate increases.

AND NOW, intending to be legally bound, the parties hereto have hereunto set their hands and seals the day and date first above written.

EAST DONEGAL SEWER AUTHORITY

ATTEST: Ernest L. Wallands, Sec.

By: Michael L. Price Chairman

EAST DONEGAL TOWNSHIP MUNICIPAL AUTHORITY

Donald S. Gish Sec.

By: John S. Fiestand Chairman

12. Please confirm that Columbia Water Company is not seeking PUC approval of an acquisition adjustment as part of this Application.

Response: Confirmed.

13. How will CWC fund the estimated $1,258,000 in capital improvements ("Assets in Need of Immediate Repair/Replacement" in the Condition Assessment Final Report)? Please explain.

    Response: Capital improvements will be funded through a combination of cash from the Authority's system operation and borrowed funds, including potentially borrowing from Pennvest.

14. How does CWC anticipate the costs for purchasing and making capital investments in the Authority's system will impact rates for existing CWC customers in the near and mid-term? Please explain and provide any estimates of rate impact.

    Response: The costs for purchasing and making capital improvements in the Authority's system will have no impact on the rates for existing CWC customers in the near or mid-term. The existing Authority customer base has been, and has the ability to continue, to operate and maintain its system.

15. Do your estimates of rate impact reflect the rate freeze in the Asset Purchase Agreement and that current rates for the acquired customers are lower than current rates for Columbia Water's existing customers? Please explain.

Response: Our estimates do take into account the rate freeze and the fact that the rates are lower than CWC's existing customers rates. The Authority has been successfully operating its system under its own rate structure. The Authority increased its rates effective July 1, 2020 which are included in the rate freeze.

VERIFICATION

I, David T. Lewis, on behalf of Columbia Water Company, hereby state that the facts above set forth 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.

David T. Lewis, P.E.
Vice President and General Manager
Columbia Water Company