

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

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

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

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

October 12, 2021

Via Electronic Filing

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission Commonwealth Keystone Building 400 North Street, 2nd Floor (filing room) 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 COMMISSIONER RALPH V. YANORA'S OCTOBER 5, 2021 OUESTIONS

Dear Secretary Chiavetta:

On behalf of The Columbia Water Company ("CWC") attached please find its Responses to the October 5, 2021 Questions from Commissioner Ralph V. Yanora in the above-referenced proceeding.

Rosemary Chiavetta, Secretary Pennsylvania Public Utility Commission October 12, 2021 Page 2

Copies have been served as indicated on the attached Certificate of Service.

Respectfully submitted,

/s/ Whitney E. Snyder

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

WES/das

Commissioner Ralph V. Yanora (via email, c/o Shaun Sparks shsparks@pa.gov) cc:

David Lewis

Michael Davis (mdavis@barley.com) Daniel Desmond (ddesmond@barley.com) Sean Donnelly(SDONNELLY@pa.gov) David Huff (dhuff@pa.gov)

Request: Commissioner Yanora-I-1 The estimated number of municipal-owned lead

service lines and the number of customer-owned lead service lines in the East Donegal Township

water distribution system (EDTWDS);

Response: There are no municipal-owned or customer-owned lead service lines in

the EDTWDS. The water system is relatively new and was constructed

after the period of time when lead service lines were used.

Response Provided by: David T. Lewis

Request: Commissioner Yanora-I-2 Columbia Water Company's (Columbia) efforts

to include the EDTWDS in its Act 120 of 2018, 66 Pa. C.S. § 1311(b)(2), customer-owned lead

service line replacements;

Response: Section 1311(b)(2) is not applicable because there are no municipal-

owned or customer-owned lead service lines in the EDTMA water

system.

Response Provided by: David T. Lewis

Request: Commissioner Yanora-I-3 Columbia's efforts to include the EDTWDS in its

tariff cross-connection control requirements regarding 25 Pa. Code §§ 109.709, 109.608, and any applicable provisions of the International Plumbing

Code;

Response: Upon Commission approval of the proposed acquisition and closing

thereof, CWC will apply these tariff provisions to the EDTWDS system within a reasonable period of time. This is a benefit of CWC acquiring the system. Specifically, CWC will contract with National Water Specialties Company, which provides services to track and monitor devices and contact non-compliant customers to bring them into compliance. See

https://nawsc.net/

Response Provided by: David T. Lewis

Request: Commissioner Yanora-I-4 Compliance materials of Columbia's efforts to

include the EDTWDS in its operation and maintenance plans required by 25 Pa. Code §109.702 as they relate to adequate, safe, and reasonable service for utility customers and

employees;

Response: Upon Commission approval of the proposed acquisition and closing

thereof, CWC will include the EDTWDS in its operation and maintenance plans within a reasonable period of time. This is a benefit of CWC acquiring the system. CWC is unaware of any non-compliance with these provisions. The DEP non-compliance records for EDTWDS submitted in response to OCA's informal discover all related to failure to monitor/report for contaminates and failure to issue notice and as noted in the DEP records compliance was achieved for these issues.

Response Provided by: David T. Lewis

Request: Commissioner Yanora-I-5 The number of EDTWDS's commercial meters

in the system, the number tested, and the number

passed or failed for calendar year 2020;

Response: The number of EDTMA commercial meters in the system in calendar

year 2020 is 20. None were tested by EDTMA in that calendar year.

Response Provided by: David T. Lewis

Request: Commissioner Yanora-I-6 The number of EDTWDS's valves exercised in

calendar year 2020 and the frequency of valve

maintenance;

Response: EDTWDS does not have a formal valve exercising program for its

water system. Only those valves that were touched during the normal course of operating the system in calendar year 2020 were exercised. Upon Commission approval and closing of the proposed transaction, EDTWDS's valves will get exercised and maintained under Columbia

Water Company's valve exercising policy.

Response Provided by: David T. Lewis

Request: Commissioner Yanora-I-7 The number of EDTWDS's commercial and

industrial customers that have testable backflow prevention devices and the number of devices that

were tested for calendar year 2020;

Response: Only 2 of EDTWDS's commercial and industrial customers have

testable backflow prevention devices. There is no record of them being tested in 2020. Upon Commission approval and closing of the proposed acquisition, Columbia Water Company will work towards having backflow devices installed on all services and tested annually as required. This is a benefit of the proposed transaction. Specifically, CWC will contract with National Water Specialties Company, which provides services to track and monitor devices and contact noncompliant customers to bring them into compliance. See

https://nawsc.net/

Response Provided by: David T. Lewis

Request: Commissioner Yanora-I-8 The integration of the EDTWD into Columbia's

tariff backflow prevention requirements regarding residential fire protection and irrigation and whether Columbia has a plan for inspection

and testing of fire hydrants;

Response: Upon Commission approval and closing of the proposed acquisition

Columbia Water Company will strive to inspect and test all fire

hydrants within a reasonable amount of time.

Response Provided by: David T. Lewis

Request: Commissioner Yanora-I-9 Whether Columbia has surveyed the number of

fire hydrants in the EDTWD that do not provide a minimum flow of 500 gallons per minute at 20

pounds per square inch;

Response: Upon Commission approval and closing of the proposed acquisition,

CWC will strive to survey and identify hydrants that do not provide a minimum flow of 500 gpm at 20 pounds per square inch within a

reasonable amount of time.

Response Provided by: David T. Lewis

Request: Commissioner Yanora-I-10 Whether Columbia has determined if the

EDTWDS's residential customers have American Society of Sanitary Engineers 1024 backflow assemblies installed at meter locations;

and

Response: EDTMA has indicated that approximately 66 percent of its residential

customers have backflow prevention devices. Upon Commission approval and closing of the proposed acquisition, Columbia Water Company will work towards having backflow devices installed on all residential services. Specifically, CWC will contract with National Water Specialties Company, which provides services to track and monitor devices and contact non-compliant customers to bring them

into compliance. See https://nawsc.net/

Response Provided by: David T. Lewis

Request: Commissioner Yanora-I-11 Whether Columbia has evaluated the EDTWDS

lost and unaccounted water performance since

2018 and any relevant results.

Response: EDTMA lost and unaccounted for water, as report to the PA

Department of Environmental Protection, is as follows:

- Calendar year 2018 – 15.2%

- Calendar year 2019 – 13.3%

- Calendar year 2020 – 13.8%

Response Provided by: David T. Lewis

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

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

Erin L. Gannon Office of Consumer Advocate 555 Walnut Street 5th Floor, Forum Place Harrisburg, PA 17101-1923 egannon@paoca.org

/s/ Whitney E. Snyder

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