

**Susan Simms Marsh**  
*Deputy General Counsel*  
Pennsylvania-American Water Company  
852 Wesley Drive, Mechanicsburg, PA 17055  
P: 717.550-1570  
Susan.marsh@amwater.com

December 14, 2021

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

**In Re: Pennsylvania American Water Company  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16  
Docket No. R-2021-3029631**

Dear Secretary Chiavetta:

In response to your letter dated December 1, 2021, attached for filing are Pennsylvania-American Water Company's responses to Data Request Set I, regarding the above referenced docket number. Please note that some responses are **CONFIDENTIAL** and should be treated as such.

If you should have any questions, please feel free to contact me.

Sincerely,



Susan Simms Marsh

cc: Paul Zander (*via electronic mail*)  
All Parties on the Attached Certificate of Service (*via electronic mail*)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Pennsylvania American Water Company : Docket No. R-2021-3029631  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. :  
16 :

**CERTIFICATE OF SERVICE**

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

**Service in the matter denoted below as follows on December 14, 2021**

Erin Gannon, Sr. Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
(via *electronic mail*)

Teresa Wagner, Executive Director  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1st Floor  
Harrisburg, PA 17101  
(via *electronic mail*)

Richard Kanaskie, Director  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(via *electronic mail*)

Respectfully Submitted,



---

Susan Simms Marsh, Esquire  
Attorney I.D. No. 044689  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Phone: 717-550-1570  
E-mail: [susan.marsh@amwater.com](mailto:susan.marsh@amwater.com)

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-1.** Please quantify the total number of wastewater customers served by PAWC-WD.

**Responses:** As of October 31, 2021, PAWC furnished wastewater service to approximately 79,020 customers.

**Responsible Witness:** **Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company**

**Date:** **December 14, 2021**

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-2.** Please provide a calculation of the number of PAWC-WD wastewater customers, by customer class (i.e., residential, commercial, industrial, etc.), whose bills will be affected by Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16 (Supplement No. 32).

**Response:** The proposed change would impact one commercial wastewater customer, Rainbow Washhouse, Inc.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-3.** Please explain the effect of the changes in Supplement No. 32 on PAWC-WD's customers.

**Response:** The change in Supplement No. 32 has no impact on PAWC's wastewater customers, except for Rainbow Washhouse, Inc., in the Valley Township (Rate Zone 11) service area.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-4.** Please explain the direct and indirect effects of the changes in Supplement No. 32 on PAWC-WD's revenues and expenses.

**Response:** The data contained in the response below is **CONFIDENTIAL**.

There is no impact to PAWC-WD expenses. The Company estimates that the existing tariff rates proposed in Supplement No. 32 equate to annual revenues of approximately **BEGIN CONFIDENTIAL** [REDACTED] **END CONFIDENTIAL** for consumption-based rates. This estimated amount is based on the historical average usage for this customer, Rainbow Washhouse, Inc.

**Responsible Witness:** **Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company**

**Date:** **December 14, 2021**

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-5.** Please explain the effect of the changes in Supplement No. 32 on service rendered by PAWC-WD.

**Response:** There is no effect on service rendered by PAWC-WD.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-6.** Please provide a list of factors considered by PAWC-WD in PAWC-WD's determination to make the changes as proposed in Supplement No. 32. This list must include a comprehensive statement about why these factors were chosen and the relative importance of each.

**Response:** Please refer to the Statement of Reasons. The reason for the proposed change is to align PAWC's tariff with the rates historically charged to the one former Valley Township wastewater customer, Rainbow Washhouse, Inc.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-7.** Please provide copies of studies undertaken by PAWC-WD to draft Supplement No. 32

**Response:** There were no studies undertaken by PAWC-WD to draft Supplement No. 32.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-8.** Please provide copies of any customer polls taken and other documents which indicate customer acceptance and desire for the proposed changes in Supplement No. 32. If any polls or other documents reveal discernible public opposition, explain why the change is in the public interest.

**Response:** No customer polls were taken.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-9.** Please explain PAWC-WD's plans for introducing or implementing the proposed changes in Supplement No. 32 with respect to its ratepayers.

**Response:** PAWC-WD's plan to implement the proposed changes in Supplement No. 32 included serving the customer with the supplement filing and contacting the customer via telephone on December 7, 2021. PAWC did not reach Rainbow Washhouse, Inc. via telephone. Specifically, there was no answer and no option to leave a voicemail message. Subsequently, a letter was mailed to Rainbow Washhouse, Inc. on December 10, 2021. Please see **Attachment R-9** – Letter to Rainbow Washhouse, Inc. for a copy of the letter.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

December 9, 2021

Rainbow Washhouse, Inc  
961 Springton Rd  
Glenmore, PA 19343-1213

RE: Wastewater Service to 897 W Lincoln Hwy, Coatesville, PA  
Account #1024-210044381933

Dear Customer,

As you are aware, Pennsylvania American Water completed the acquisition of Valley Township's water and wastewater system on November 19, 2021. As part of the acquisition approved by the Pennsylvania Public Utility Commission ("PA PUC"), rates for wastewater service will remain the same as in effect by the Township at the time of closing. During the data conversion, billing to the above service address was identified as being outside of the Township's rate structure as approved in their ordinance and the tariff supplement approved by the PA PUC as part of the acquisition.

On November 22, 2021, Pennsylvania American Water filed a tariff supplement to adopt the Township's resolution pertaining to the rate structure of this property. The date of this filing is 11/22/2021. Pennsylvania American Water mailed a copy of this tariff supplement to via first class mail to you on December 7, 2021. Once the tariff supplement is approved, the usage charge will become effective 60 days from the date of filing. Therefore, until the tariff supplement is approved by the PA PUC, you will be billed for the flat rate only. Once approved, you will then see the usage charge on your bill moving forward. Pennsylvania American Water will not back billed for the usage from the date of closing until the tariff supplement is approved.

Should you have any questions, please feel free to contact me at 717/614-3259.

Regards,

Jody Watts  
Business Development Manager

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-10.** Identify Commission Orders or rulings applicable to Supplement No. 32.

**Response:** By Order entered October 28, 2021 at Docket No. A-2020-3020178, the Commission authorized PAWC's acquisition of the wastewater system assets of Valley Township, and additionally requires that PAWC charge rates after closing that are equal to Valley's existing rates (see page 29 of order). On November 23, 2021, the Commission approved Supplement No. 31 to Tariff Wastewater PA P.U.C. No. 16, establishing the rates for the Valley Township service territory.

**Responsible Witness:** **Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company**

**Date:** **December 14, 2021**

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-11.** Please provide a breakdown of the estimated amount PAWC-WD would charge for one month of wastewater service rendered to Rainbow Washhouse, Inc. in Rate Zone 11 before the effective date of Supplement No. 32. This breakdown must separately identify service charges, consumption charges, and other charges, and must assume a reasonable amount of water consumption or wastewater usage, as compared with similarly situated PAWC-WD wastewater customers.

**Response:** The data contained in the response below is **CONFIDENTIAL**.

Prior to the effective date of Supplement No. 32, PAWC would charge Rainbow Washhouse, Inc. a monthly service charge of \$73.33 for unmetered charges, as reflected on page 11.13 of the currently approved tariff. Based on historical consumption information provided by Valley Township, the Company estimates that the customer's usage would be approximately **BEGIN CONFIDENTIAL** **END CONFIDENTIAL**. The Company does not intend to charge the customer for this usage because the existing rate for this customer is not part of the currently approved tariff.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-12.** Please provide a breakdown of the estimated amount PAWC-WD would charge for one month of wastewater service rendered to Rainbow Washhouse, Inc. after the effective date of Supplement No. 32. This breakdown must separately identify service charges, consumption charges, and other charges, and must assume the same amount of water consumption or wastewater usage that PAWC-WD used in PAWC's response to R-11.

**Response:** The data contained in the response below is **CONFIDENTIAL**.

After the effective date of Supplement No. 32, PAWC would charge Rainbow Washhouse, Inc. a monthly service charge of \$73.33. A rate of \$0.207 per hundred gallons for consumption over 2,000 gallons per month would then be applied to any consumption the customer would generate in each billing cycle. Based on historical consumption information provided by Valley Township, the Company estimates that the customer's usage would be approximately **BEGIN CONFIDENTIAL** [REDACTED] **END CONFIDENTIAL**.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-13.** If PAWC-WD's responses to R-11 and R-12 are not equal, please explain the reason for each increase or decrease proposed in Supplement No. 32.

**Response:** Prior to the approval of tariff Supplement No. 32, the Company would not charge a rate that is not approved. Therefore, the Company's response to R-12 describes the rate that would be charged after the PUC approves the tariff.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-14.** If PAWC-WD’s responses to R-11 and R-12 are not equal, please provide an operating income statement for PAWC-WD for a 12-month period, the end of which may not be more than 120 days prior to the date Supplement No. 32 was filed with the Commission.

**Response:** Please see below for PAWC’s income statement for the 12 months ended September 30, 2021. This is the per-books income statement for water and wastewater operations and does not reflect any additional adjustments or allocations between water and wastewater operations.

LINE NO.	DESCRIPTION	Water Operations PER BOOKS	Wastewater Operations PER BOOKS	Total Company PER BOOKS
1	Operating Revenue	\$683,369,498	\$78,741,054	\$762,110,552
2	Operating Revenue Deductions:			
3	Operating Expenses	200,112,962	24,510,913	224,623,875
4	Depreciation	139,264,431	24,662,551	163,926,982
5	Amortizations	955,577	102,563	1,058,140
6	Taxes, Other Than Income:			0
7	Local Property And Miscellaneous	3,210,000	0	3,210,000
8	Federal Environmental Tax	0	0	0
9	Public Utility Realty Taxes	2,248,870	0	2,248,870
10	Payroll Taxes	4,251,827	663,661	4,915,488
11	General Assessment	4,410,579	0	4,410,579
12	State Capital Stock Tax	0	0	0
13	Total Taxes Other Than Income	14,121,276	663,661	14,784,937
14	<b>Utility Operating Income Before Income Taxes</b>	<b>328,915,252</b>	<b>28,801,366</b>	<b>357,716,618</b>
15	Income Taxes:			
16	State Income Tax	(2,512,024)	0	(2,512,024)
17	Federal Income Tax	63,018,121	0	63,018,121
18	Amortization Of ITC & Excess Deferred Taxes	(233,592)	0	(233,592)
19	Total Income Taxes	60,272,505	0	60,272,505
20	Total Operating Revenue Deductions	414,726,751	49,939,688	464,666,439
21	<b>Utility Operating Income</b>	<b>268,642,747</b>	<b>28,801,366</b>	<b>297,444,113</b>
22	Income Deductions:			
23	Interest On Long Term Debt	75,880,730	0	75,880,730
24	Amortization Of Debt Discount Expense	1,692,469	0	1,692,469
25	Interest On Notes Payable To Others	728,346	0	728,346
26	Total Income Deductions	78,301,545	0	78,301,545
27	<b>Net Income</b>	<b>\$190,341,202</b>	<b>\$28,801,366</b>	<b>\$219,142,568</b>
28	Preferred Dividends	0	0	0
29	<b>Net Income To Common</b>	<b>\$190,341,202</b>	<b>\$28,801,366</b>	<b>\$219,142,568</b>

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**Responsible Witness: Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company**

**Date: December 14, 2021**

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-15.** If PAWC-WD's responses to R-11 and R-12 are not equal, please provide a calculation of the number of PAWC-WD customers, by customer class, whose bills will be increased by Supplement No. 32.

**Response:** If Supplement No. 32 were to be approved, there would be one commercial wastewater customer, Rainbow Washhouse, Inc., who would be charged the former existing rates of Valley Township that was in effect at the time of closing.

**Responsible Witness:** **Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company**

**Date:** **December 14, 2021**

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-16.** If PAWC-WD's responses to R-11 and R-12 are not equal, please provide a calculation of the total increases, in dollars, by customer class, projected to an annual basis, resulting from Supplement No. 32.

**Response:** The data contained in the response below is **CONFIDENTIAL**.

The annualized amount of the estimated monthly consumption charges would be approximately **BEGIN CONFIDENTIAL** [REDACTED] **END CONFIDENTIAL** for one commercial wastewater customer.

**Responsible Witness:** **Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company**

**Date:** **December 14, 2021**

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-17.** If PAWC-WD's responses to R-11 and R-12 are not equal, please provide a calculation of the number of PAWC-WD customers, by customer class, whose bills will be decreased by Supplement No. 32.

**Response:** None.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-18.** If PAWC-WD's responses to R-11 and R-12 are not equal, please provide a calculation of the total decreases, in dollars, by customer class, projected to an annual basis, resulting from Supplement No. 32.

**Response:** None.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-19.** Please specify the number of customers, by customer class, that are an affected customer

**Response:** One commercial wastewater customer, Rainbow Washhouse, Inc., would be affected by Supplement No. 32.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-20.** Please indicate the date each affected customer began to receive wastewater service from PAWC-WD.

**Response:** Rainbow Washhouse, Inc. began to receive wastewater service from PAWC-WD on November 19, 2021.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-21.** Please provide a calculation of the total amount PAWC-WD anticipates will be paid by each affected customer in excess of PAWC-WD's prevailing wastewater tariff rates, together with interest at the legal rate.

**Response:** None.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-22.** Please provide a certificate of service evidencing that a copy of Supplement No. 32 has been served upon each affected customer and each party of record at PAWC's application involving Valley Township's wastewater system at Docket No. A-2020-3020178 (the Application).

**Response:** Please refer to **Attachment R-22** – Letter to Rainbow Washhouse, Inc. enclosing Tariff Supplement.

**Responsible Witness:** **Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company**

**Date:** **December 14, 2021**

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. **Fold the printed label at the solid line below.** Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. **GETTING YOUR SHIPMENT TO UPS**  
**Customers with a Daily Pickup**  
 Your driver will pickup your shipment(s) as usual.

**Customers without a Daily Pickup**

Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.

Hand the package to any UPS driver in your area.

UPS Access Point™  
ADVANCE AUTO PARTS STORE 4532  
5263 SIMPSON FERRY RD  
MECHANICSBURG ,PA 17050

UPS Access Point™  
THE UPS STORE  
275 CUMBERLAND PKWY  
MECHANICSBURG ,PA 17055

UPS Access Point™  
THE UPS STORE  
4900 CARLISLE PIKE  
MECHANICSBURG ,PA 17050

FOLD HERE

<p style="text-align: right;"><b>1 OF 1</b></p> <p><b>LTR</b></p> <p>JANA HURST PA,AW - MECHANICSBURG - LEGAL 852 WESLEY DRIVE MECHANICSBURG PA 17055</p> <p><b>SHIP TO:</b> RAINBOW WASHHOUSE, INC. 961 SPRINGTON ROAD <b>GLENMOORE PA 19343-1213</b></p>	<p><b>PA 193 9-09</b></p> 	<p><b>UPS NEXT DAY AIR</b></p> <p><b>1</b></p> <p>TRACKING #: 1Z 172 3E2 01 9766 3976</p>		<p><b>BILLING: P/P</b></p>  <p>CS 22.0.1B. WNTNV50 50.0A 12/2021*</p>
--	---	---	---	--

**Susan Simms Marsh**  
*Deputy General Counsel*  
Pennsylvania-American Water Company  
852 Wesley Drive, Mechanicsburg, PA 17055  
P: 717.550-1570  
Susan.marsh@amwater.com

December 7, 2021

**VIA OVERNIGHT MAIL**

Rainbow Washhouse, Inc.  
961 Springton Road  
Glenmoore, PA 19343

**In Re: Pennsylvania American Water Company  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16  
Docket No. R-2021-3029631**

Dear Sir or Madam:

On November 22, 2021, Pennsylvania-American Water Company filed the above-captioned tariff supplement at the Pennsylvania Public Utility Commission. A copy of this tariff supplement is attached for your records.

If you should have any questions, please feel free to contact me.

Sincerely,



Susan Simms Marsh

cc: All Parties on the Attached Certificate of Service (*via electronic mail*)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Pennsylvania American Water Company : Docket No. R-2021  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. :  
16 :

**CERTIFICATE OF SERVICE**

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

**Service in the matter denoted below as follows on December 7, 2021**

Rainbow Washhouse, Inc.  
961 Springton Road  
Glenmoore, PA 19343

Respectfully Submitted,



---

Susan Simms Marsh, Esquire  
Attorney I.D. No. 044689  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Phone: 717-550-1570  
E-mail: [susan.marsh@amwater.com](mailto:susan.marsh@amwater.com)

**Susan Simms Marsh***Deputy General Counsel*

Pennsylvania-American Water Company

852 Wesley Drive, Mechanicsburg, PA 17055

P: 717.550-1570

Susan.marsh@amwater.com

November 22, 2021

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

**In Re: Pennsylvania American Water Company  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16  
Docket No. R-2021-**

Dear Secretary Chiavetta:

Pennsylvania-American Water Company (the "Company") is filing the enclosed Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16 ("Supplement No. 32"). Supplement No. 32 contains an issue date of November 22, 2021, and an effective date of January 21, 2022 (which is 60 days from the date of filing). In Supplement No. 32, the Company proposes to modify the rate structure for Valley Township to include a special rate for Rainbow Washhouse, Inc. This rate has no impact on any other former Valley Township customers except for Rainbow Washhouse, Inc. This rate was previously approved by Valley Township Board of Supervisors and is shown at Resolution 2021-18.

The following materials are also enclosed to support the tariff change:

- (a) Valley Township Resolution 2021-18
- (b) Statement of Reasons, and
- (c) Responses to 52 Pa. Code §53.52 (a) and (b)

As indicated on the enclosed Certificate of Service, copies of the foregoing materials will be served upon the Commission's Bureau of Investigation and Enforcement, the Office of Small Business Advocate, and the Office of Consumer Advocate.

If you should have any questions, please feel free to contact me.

Sincerely,



Susan Simms Marsh

cc: All Parties on the Attached Certificate of Service *(via electronic mail)*

**PENNSYLVANIA-AMERICAN WATER COMPANY**

**STATEMENT OF REASONS**

Pennsylvania-American Water Company (“PAWC”) is filing herewith Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16, which bears a proposed effective date of January 21, 2022 (“Tariff Supplement No. 32”). On November 18, 2021, PAWC acquired the wastewater system assets of Valley Township (“Valley”) and filed Supplement No. 31 to Tariff Wastewater PA P.U.C. No. 16 (“Tariff Supplement No. 31”) to authorize a rate zone to be established applicable to one customer formerly served by Valley.

As part of the acquisition integration process, PAWC discovered that one of the customers, Rainbow Washhouse, Inc., Valley had been billing \$220.00 per quarter for 0 to 6,000 gallons and for each additional 1,000 gallons, \$2.07 per additional 1,000 gallons per quarter. On September 21, 2021, Valley’s Board of Supervisors passed Resolution #2021-18 Acknowledgment of Existing Sewer Rate. See Attachment to Tariff Supplement No. 32. Tariff Supplement No. 31, consistent with the pro forma tariff supplement submitted with PAWC’s application at Docket No. A-2020-3020178 on October 9, 2020 and approved by the Commission on October 28, 2021, did not include the rate because PAWC did not have knowledge from the seller that the one customer’s rate was not included in Valley’s resolutions setting rates for wastewater service. PAWC is proposing Tariff Supplement 32 to include a monthly service charge of \$73.33, with the first 2,000 gallons per month equal to the service charge and all over 2,000 gallons per month is \$0.207 per hundred gallons. This is consistent with what the customer has been billed historically by Valley. The proposed tariff change would have no impact on the rates charged to existing PAWC water and wastewater customers nor to the rates charged to the former Valley customers. It would merely align PAWC’s tariff with the rates historically charged to the one former Valley customer. There is no impact to PAWC’s revenues from this proposed tariff revision.

**RESOLUTION  
Valley Township  
Chester County, Pennsylvania  
Resolution #2021- 18**

Acknowledgment of Existing Sewer Rate

**WHEREAS**, Valley Township (the "Township") owns and operates a sewer system;

**WHEREAS**, from time to time, the Township through its Board of Supervisors sets rates for sewer services;

**WHEREAS**, Rainbow Washhouse, Inc. is the owner of 897 West Lincoln Highway, being Tax Parcel No 38-28-32.1 (the "Property");

**WHEREAS**, a car wash and laundry mat is operated on the Property;

**WHEREAS**, in January 2013, the sewer rate for the Property was set as follows:

0 to 6,000 gallons: \$220.00 per quarter

**WHEREAS**, some time prior to 2009, the additional charge for usage beyond the base sewer rate for the Property was set as:

For each additional 1,000 gallons: \$2.07 per additional 1,000 gallons per quarter;

**WHEREAS**, the additional charge for usage beyond the base sewer rate for the Property did not change in 2013 and has remained in place to the present date;

**WHEREAS**, the documentation related to this sewer rate has since been lost; and

**WHEREAS**, as part of the sale of the Township's sewer system to Pennsylvania American Water Company, the Township desires to confirm the existing sewer rate for the Property.

**NOW, THEREFORE**, we, the undersigned Board of Supervisors of Valley Township, do hereby resolve as follows:

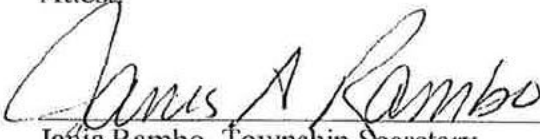
1. The existing sewer rate for the Property is:

0 to 6,000 gallons: \$220.00 per quarter

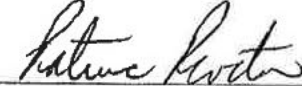
For each additional 1,000 gallons: \$2.07 per additional 1,000 gallons per quarter;

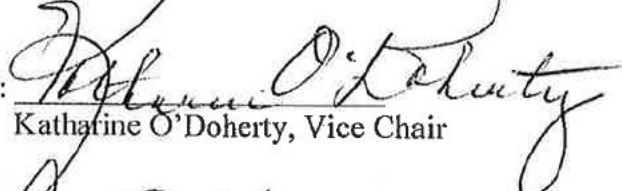
**ENACTED AND RESOLVED** as of this 21st day of September 2021. This Resolution shall take effect immediately.

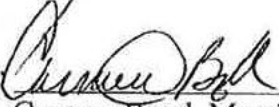
Attest:

  
Janis Rambo, Township Secretary

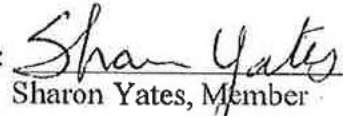
TOWNSHIP OF VALLEY

BY:   
Patrice Proctor, Chair

BY:   
Katharine O'Doherty, Vice Chair

BY:   
Carmen Boyd, Member

BY:   
Casey Leidy, Member

BY:   
Sharon Yates, Member

**PENNSYLVANIA-AMERICAN WATER COMPANYS  
Wastewater Division  
(hereinafter referred to as the "Company")  
D/B/A  
Pennsylvania American Water**

**RATES, RULES AND REGULATIONS**

**GOVERNING THE FURNISHINGS OF**

**WASTEWATER COLLECTION AND DISPOSAL SERVICE**

**IN CERTAIN MUNICIPALITIES AND TERRITORIES LOCATED IN:**

ADAMS COUNTY, ALLEGHENY COUNTY, BEAVER COUNTY, BERKS COUNTY,  
CHESTER COUNTY, CLARION COUNTY, CUMBERLAND COUNTY, LACKAWANNA  
COUNTY, MCKEAN COUNTY, MONROE COUNTY, MONTGOMERY COUNTY,  
NORTHUMBERLAND COUNTY, PIKE COUNTY, WASHINGTON COUNTY AND YORK  
COUNTY

ALL IN THE COMMONWEALTH OF PENNSYLVANIA

**Issued: November 22, 2021**

**Effective: January 21, 2022**

Issued by:  
F. Michael Doran, President  
Pennsylvania American Water  
852 Wesley Drive  
Mechanicsburg, PA 17055

<https://www.amwater.com/paaw/>

# **NOTICE**

**This tariff supplement adds a special rate for Rainbow Washhouse in Rate Zone 11 (Valley). (Refer to pages 1, 2, 4, and 11.13.)**

**PENNSYLVANIA-AMERICAN WATER COMPANY**

---

**LIST OF CHANGES**

This tariff supplement adds a special rate for Rainbow Washhouse, Inc. in accordance with 66 Pa. Code C.S. § 1329(d)(4), reflecting the existing rates of Valley Township at the time of acquisition. The special rate for Rainbow Washhouse was established in Valley Township Resolution #2021-18, effective September 21, 2021.

**PENNSYLVANIA-AMERICAN WATER COMPANY**

**TABLE OF CONTENTS**

	<u><b>Page</b></u>		
	<u><b>Number</b></u>		
Title Page .....	1	Supplement No. 32	(C)
List of Changes .....	2	Twenty-fifth Revised Page	(C)
List of Changes (cont'd).....	3	First Revised Page	
Table of Contents .....	4	Twenty-fifth Revised Page	(C)
Table of Contents (cont'd).....	5	Fourth Revised Page	
Table of Contents (cont'd).....	6	Eleventh Revised Page	
Reserved Page for Future Use .....	7	First Revised Page	
List of Territories Served.....	8	Twelfth Revised Page	
List of Territories Served (cont'd) .....	9	Third Revised Page	
Reserved Page for Future Use .....	10	First Revised Page	
 <b><u>Schedule of Rates</u></b>			
Rate Zone 1 – Metered and Unmetered.....	11.1	Fifth Revised Page	
Rate Zone 1 – Metered and Unmetered .....	11.2	Third Revised Page	
Rate Zone 2 – Metered (New Cumberland) .....	11.3	Third Revised Page	
Rate Zone 3 – Metered and Unmetered (Scranton) .....	11.4	Third Revised Page	
Rate Zone 4 – Metered and Unmetered (Kane) .....	11.5	Second Revised Page	
Rate Zone 5 – Metered and Unmetered (Franklin).....	11.6	Second Revised Page	
Rate Zone 6 – Metered and Unmetered (McKeesport)....	11.7	Second Revised Page	
Rate Zone 6 – Metered and Unmetered (McKeesport) .....	11.8	Second Revised Page	
Rate Zone 7 – Metered and Unmetered (Sadsbury).....	11.9	Second Revised Page	
Rate Zone 8 – Metered and Unmetered (Turbotville) .....	11.10	Second Revised Page	
Rate Zone 9 – Metered and Unmetered (Exeter) .....	11.11	Second Revised Page	
Rate Zone 10 – Metered and Unmetered (Royersford) ...	11.12	Third Revised Page	
Rate Zone 11 – Metered and Unmetered (Valley).....	11.13	First Revised Page	(C)
Miscellaneous Fees and Charges .....	12	First Revised Page	
Miscellaneous Fees and Charges (cont'd).....	13	First Revised Page	
Miscellaneous Fees and Charges (cont'd).....	14	First Revised Page	
Miscellaneous Fees and Charges (cont'd).....	15	Fifth Revised Page	
Miscellaneous Fees and Charges (cont'd).....	15.1	Original Page	
Low-Income Rider – All Rate Zones – Residential .....	16	Third Revised Page	
State Tax Adjustment Surcharge (STAS).....	17	First Revised Page	
Distribution System Improvement Charge (DSIC) .....	18.1	Twelfth Revised Page	
DSIC (cont'd).....	18.2	First Revised Page	
DSIC (cont'd).....	18.3	First Revised Page	
DSIC (cont'd).....	18.4	First Revised Page	
Recoupment Surcharge .....	19	Fourth Revised Page	

(C) means Change

**PENNSYLVANIA-AMERICAN WATER COMPANY**

**SCHEDULE OF RATES**

**RATE ZONE 11 – METERED AND UNMETERED**

**APPLICABILITY**

The rates as set forth below will apply in the Valley service territory (territory formerly served by Valley Township) served under this tariff for service rendered on and after the Effective Date shown at the bottom of this page.

**AVAILABILITY**

The rates under this schedule are available to customers in all classes.

**METERED CHARGES (Based on Water Usage or Sewage Flows, determined at PAWC's discretion)**

All metered customers shall be subject to a service charge.

**Service Charge For All Rate Classes**

All metered customers shall be subject to a monthly service charge of \$59.67.

**Usage Charge For All Bill Classes:**

First	3,400 gallons per month	Service Charge
All over	3,400 gallons per month	\$1.1200 per hundred

**Special Rate for Westwood Fire Company**

Monthly Service Charge: \$0.00  
 Rate per 100 gallons: \$0.00

**Special Rate for Rainbow Washhouse, Inc.**

Service charge per month	\$73.33	(C)
First 2,000 gallons per month	Service Charge	
All over 2,000 gallons per month	\$0.207 per hundred	

**UNMETERED CHARGES**

This charge is a flat rate fee for customers not metered for water consumption.

**All Customer Classes**

Flat Rate per Month, per EDU \$73.33

(C) means Change

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: Pennsylvania American Water Company : Docket No. R-2021  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. :  
16 :

**CERTIFICATE OF SERVICE**

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

**Service in the matter denoted below as follows on November 22, 2021**

Paul Diskin, Director  
Pennsylvania Public Utility Commission  
Bureau of Technical Utility Services  
400 North Street  
Commonwealth Keystone Building  
Harrisburg, PA 17105-3265  
(via electronic mail)

Christine Maloni Hoover, Interim  
Consumer Advocate  
Erin Gannon, Sr. Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
Forum Place, 5<sup>th</sup> Floor  
Harrisburg, PA 17101-1923  
(via electronic mail)

Richard Kanaskie, Director  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(via electronic mail)

Teresa Wagner, Executive Director  
Office of Small Business Advocate  
555 Walnut Street  
Forum Place, 1st Floor  
Harrisburg, PA 17101  
(via electronic mail)

Respectfully Submitted,



---

Susan Simms Marsh, Esquire  
Attorney I.D. No. 044689  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Phone: 717-550-1570  
E-mail: [susan.marsh@amwater.com](mailto:susan.marsh@amwater.com)

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-23.** PAWC-WD's filing dated November 22, 2021, at Docket No. R-2021-3029631 (November 22 Filing) appears to contain various averments of fact not appearing of record which are required to be verified by a PAWC-WD-authorized officer or employee. Please provide a verification statement that: (1) references PAWC-WD's November 22 Filing; (2) identifies each PAWC-WD-authorized officer or employee that is responsible for providing the information included in PAWC-WD's November 22 Filing; (3) is signed by each PAWC-WD-authorized officer or employee responsible for providing the information included in PAWC-WD's November 22 Filing; and (4) complies with 52 Pa. Code § 1.36(b).

**Response:** Please refer to **Attachment R-23** – Verification of Stacey Gress regarding Tariff Supplement.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

## VERIFICATION

I, Stacey Gress, hereby state that the facts set forth in Tariff Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16 dated November 22, 2021, 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 held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.



---

Stacey Gress, Director Rates and Regulatory  
American Water Works Service Company

Dated: 12/8/2021

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-24.** Please explain how, and identify the date when, PAWC -WD determined that Valley Township (Valley) charged Rainbow Washhouse, Inc. rates that differ from the rates included in Supplement No. 31 to Tariff Wastewater PA P.U.C. No. 16 (Supplement No. 31). Also, if PAWC-WD determined Rainbow Washhouse, Inc. was subject to rates that differ from the rates included in Supplement No. 31 prior to closing on its transaction with Valley, please explain why PAWC-WD proceeded to closing before seeking Commission approval of modifications to PAWC-WD's proposed wastewater tariff to include Valley's existing rates for wastewater service.

**Response:** As part of the acquisition integration process, PAWC conducts customer data testing. Valley Township provided PAWC customer data for purposes of testing various processes for customer service which include but is not limited to billing. In order to conduct the testing, PAWC maps the data. During customer data mapping, PAWC identified Rainbow Washhouse, Inc., which was listed as a flat rate, had usage data. PAWC subsequently asked Valley Township about Rainbow Washhouse, Inc. usage. Valley Township reviewed and researched the Rainbow Washhouse, Inc. account and confirmed usage and the rate Valley Township charged this customer. On August 11, 2021, PAWC requested Valley Township provide an agreement or resolution that established Rainbow Washhouse, Inc. rates. On September 21, 2021, Valley Township Board of Supervisor passed Resolution #2021-8 Acknowledgment of Existing Rate. PAWC closed on the transaction because it was not the intent of the Company to charge Rainbow Washhouse, Inc. the rate as provided for in Resolution #2021-8 until such time as PUC approval of a tariff supplement. As of December 14, 2021, PAWC has not charged the rate to the customer and do not intend to do so until such time as the rate would go into effect pursuant to the Commission Order on or about January 21, 2022.

**Responsible Witness:** **Scott Fogelsanger – Senior Manager, Business Development  
Pennsylvania-American Water Company**

**Date:** **December 14, 2021**

**Pennsylvania-American Water Company – Wastewater Division  
Supplement No. 32 to Tariff Wastewater PA P.U.C. No. 16**

**Docket No. R-2021-3029631**

**PAWC-WD Responses to Set 1 Interrogatories Propounded by Technical Utility Services  
("TUS")**

**R-25.** Please explain whether differences between Supplement No. 31 and Supplement No. 32 would have affected the Commission’s approval or evaluation of the following components of PAWC’s Application: (1) ratemaking rate base, regarding impacts to projected revenues under the income approach method of utility valuation expert appraisals under Supplement No. 32 as compared with Supplement No. 31; (2) conditions of Application approval; and (3) adequacy of customer notice, including that PAWC-WD’s customer notice for the Application indicated, “This acquisition will not immediately, but may in the future, affect [...] wastewater bills of [PAWC-WD] customers, including [Valley] wastewater customers. [...] Your current rates will not change as a result of this acquisition[.]”

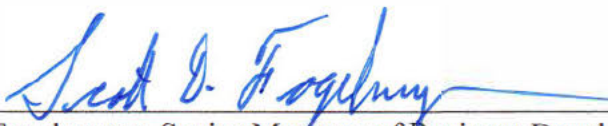
**Response:** No. The Company expects that inclusion of this rate in the tariff supplement filed with the Application would not have changed the ratemaking rate base, conditions of approval, or the customer notice. Notably, the Company is proposing in this filing to maintain an existing rate of Valley Township, consistent with the Commission’s approval of other existing rates of Valley Township. Had the Company been aware of this rate at the time of filing the Application with the PUC, the Company expects that the Commission would have approved this rate as part of the Application.

**Responsible Witness:** Stacey Gress, Director of Rates and Regulatory  
American Water Works Service Company

**Date:** December 14, 2021

## VERIFICATION

I, Scott Fogelsanger hereby state that the facts above set forth above 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 held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 (relating to unsworn falsification to authorities).



---

Scott Fogelsanger, Senior Manager of Business Development  
Pennsylvania-American Water Company

Dated: December 14, 2021

## VERIFICATION

I, Stacey Gress, hereby state that the facts above set forth above 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 held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.



---

Stacey Gress, Director Rates and Regulatory  
American Water Works Service Company

Dated: 12/14/2021