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216 Vassar Ave.
Swarthmore, PA 19081
610-565-9330
Goldfield.Steven@Verizon.net

DATE OF DEPOSIT

February 14, 2022

FEB 14 2022

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

PA PUBLIC UTILITY COMMISSION
SECRETARYS BUREAU

**In re: Pennsylvania Public Utility Commission Docket No. A-2021-3026132
Application of Aqua Pennsylvania Wastewater, Inc. - East Whiteland Township**


Dear Secretary Chiavetta:

This letter, together with the memorandum attached hereto, are submitted on behalf of the Valley Forge Sewer Authority in connection with the Pennsylvania Public Utility Commission's Section 507 determination of any issues with reasonableness, legality, or any other matter pertaining to the following agreement.

The East Whiteland Trunk Line Agreement executed and delivered as of February 1, 1971, as supplemented and amended, by and between the East Whiteland Municipal Authority, the Township of East Whiteland, Malvern Municipal Authority, the Borough of Malvern and the Valley Forge Sewer Authority.

A copy of this letter and the memorandum attached have been delivered electronically to counsel to the Applicant and all parties of record.

Sincerely,


Steven A. Goldfield, Esquire
Counsel to Valley Forge Sewer Authority

cc: Alexander R. Stahl, Esquire astahl@aquaamerica.com
Thomas Niesen, Esquire tniesen@tntlawfirm.com
Erin Fure, Esquire efure@pa.gov
Christine M. Hoover, Esquire CHoover@paoca.org
Erin L. Gannon, Esquire EGannon@paoca.org
Carrie B. Wright, Esquire carwright@pa.gov
Thomas Wyatt, Esquire Thomas.Wyatt@obermayer.com

Steven A. Goldfield, Esquire

216 Vassar Ave.
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610.565.9330
610.304.0603(C)

DATE OF DEPOSIT

**To: Alexander Stahl, Mark Bubel, Kyle Roberts,
Sean Carney and Vince Donohue**

FEB 14 2022

**Re: East Whiteland Trunk Line Agreement
Date: January 12, 2022**

**PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU**

On behalf of the Valley Forge Sewer Authority, I want to thank you for taking the time to confirm to us that in connection with its acquisition of the East Whiteland wastewater assets, Aqua does not intend to seek any amendments to the East Whiteland Trunk Line Agreement (as defined below)¹, or any other agreement involving the Valley Forge Sewer Authority.

As I explained on our call, the Valley Forge Sewer Authority experienced a steep increase in costs related to East Whiteland's revised percentages for use of the Valley Creek Trunk Sewer commencing in 2019, and expects another steep increase as a result of the "Revenue Requirement/Rate" for the Valley Creek Trunk Sewer being increased from \$2,000,000 per year to \$3,100,000 in 2022. Accordingly, we reached out early and often to make sure that either Aqua did not intend to seek changes to the definitions and material terms in the Trunk Line Agreement, or if they did seek changes there would be plenty of time for the parties to assess their relative positions and negotiate just and fair compensation for any such changes.

My client's first preference was to continue the Trunk Line Agreement as written and thus they were pleased when I reported back that this was Aqua's intentions as it progresses through the PUC process and through closing on the East Whiteland

¹ The East Whiteland Trunk Line Agreement was executed and delivered as of February 1, 1971 (the "Original Agreement") and was by and between the East Whiteland Municipal Authority, the Township of East Whiteland, Malvern Municipal Authority, the Borough of Malvern and the Valley Forge Sewer Authority. The Original Agreement was amended by Composite Amendment No. 1, dated as of December 1, 1974 ("Composite Amendment No. 1"). On December 27, 1978, East Whiteland Authority and Valley Forge Sewer Authority entered into a cost sharing agreement for the Sidley Road Trunk Line repairs (the "Sidley Road Cost Sharing Agreement"). The Original Agreement was again amended as of December 12, 1979, and again on April 18, 2014 (these amendments together with the Original Agreement, the Composite Amendment No. 1 and the Sidley Road Cost Sharing Agreement are collectively referred to herein as the "Trunk Line Agreement.").

acquisition.

Our conversation was appropriately broken down into two discreet areas of cost and charges - 1. Capital Improvements within East Whiteland Township that are used by Valley Forge Sewer Authority (Charlestown service area) and 2. Operating Expenses for the portion of the East Whiteland Trunk used by Valley Forge Sewer Authority (Charlestown service area).

1. Capital Improvements - My understanding from our conversation is that only capital assets actually being utilized by Charlestown such as connector pipes, pump stations and force mains (e.g. Mill Lane, Lee Boulevard and Hillbrook pump stations), will be relevant when it comes to any assessment to VFSA for future capital charges, that the charges will be based upon the reserve capacity of the Valley Forge Sewer Authority (432,302 gallons per day) and will be assessed in accordance with the April 18, 2014 amendment to the Trunk Line Agreement.

2. Actual Annual Operating Expenses - My understanding from our conversation is that while the definition of actual annual operating expenses (see attached) is different from what Aqua would include in what it would consider its Cost of Service (e.g. does not include a return of, and on, the acquisition price, return on investment, capital expenditures elsewhere, etc.), Aqua intends to accept the language in the Trunk Line Agreement "as is", does not currently anticipate seeking any amendments and will be charging only those operating expenses defined in the Trunk Line Agreement for the operation of the portion of the wastewater system used by VFSA.² VFSA will pay operating expenses based upon its actual flow as a percentage of the total. Attached is the most recent sewer bill from East Whiteland to Valley Forge Sewer Authority demonstrating how the calculations are performed.

Finally, we understand that approvals from municipalities served by the acquiring utility have become important issues during the PUC process and we intend to file this letter with the PUC demonstrating our acquiescence. We trust that the foregoing is an accurate summary of our conversation. Please contact us if you have any questions.

Steven Goldfield, Esquire
For Valley Forge Sewer Authority

² We have attached for your records, a copy of the letters from East Whiteland Township to Valley Forge Sewer Authority that have served as the basis for the past 18 years for allocation of actual annual operating expenses to be charged to Valley Forge Sewer Authority (with nuances that we note relating to percent share of pumping stations and meters and the Sanitary Sewer Collection System).

ACTUAL ANNUAL OPERATING EXPENSES

Such moneys may be wholly or partially invested by said Township subject to the same limitations set forth in Section 2.05. Any securities so purchased shall be a part of the Operating Fund. The interest and income received from time to time upon investments and any profit realized or loss sustained from the sale of such securities shall be added to or charged to the Operating Fund and such interest, income, profit or loss shall be considered in determining the actual annual operating expenses of the East Whiteland Trunk Line pursuant to Section 4.06 hereof

4.05 Annual Statement.

Within one-hundred twenty (120) days of the close of each calendar year, East Whiteland Township shall cause to be prepared and submitted to each of said municipalities a detailed statement, certified by a certified public accountant engaged by East Whiteland Township, showing the actual annual operating expenses of the East Whiteland Trunk Line (as defined in the next succeeding Section) and the apportionment of the cost among the said municipalities on the basis of Section 4.01.

4.06 Actual Annual Operating Expenses of the East Whiteland Trunk Line.

"Actual annual operating expenses of the East Whiteland Trunk Line" shall mean the sum of the costs referred to in subsections (a) through (f) hereof minus the deductions referred to in Section 4.07 hereof:

(a) All the actual reasonable expenses and costs of the adequate proper operation, maintenance and repair of the East Whiteland Trunk Line as the same may be constituted from time to time, determined in accordance with sound accounting practices and shall include, without limiting the generality of the foregoing, salaries and wages of operating, supervisory and administrative personnel directly charged to the operation, maintenance and repair of the East Whiteland Trunk Line (but in the event such personnel are also engaged in other activities of a municipality, shall include only that proportion of such salaries

and wages as is properly allocable to such operation, maintenance and repair on the basis of time spent or services performed); pensions, social security or unemployment taxes; chemicals; power; taxes (if any); insurance; administrative expenses; materials and supplies; maintenance; and repairs, improvements and betterments (including ordinary or routine repairs and replacements but not extraordinary replacements or additions of a capital nature which latter shall be treated in the manner provided for expansion in Section 7.02, except to the extent that Article VIII shall apply);

(b) The fees and expenses of the Consulting Engineers employed by East Whiteland Township concerning the operation, maintenance and repair of the East Whiteland Trunk Line and in preparing reports and determinations required by this Agreement;

(c) The fees and expenses of the certified public accountant engaged by East Whiteland Township to prepare the annual statement;

(d) Interest paid by East Whiteland Township pursuant to Section 4.04 hereof;

(e) The cost of that portion of the bond of the Treasurer and other officers or employees of East Whiteland Township attributable to his or their duties in connection with East Whiteland Trunk Line, under sound accounting practices; and

(f) Reasonable expenses of East Whiteland Township in providing service pursuant to this Agreement and attributable to the East Whiteland Trunk Line under sound accounting practices.

4.07 Deductions.

Any Federal or State contributions or grants in aid received by any party which is to be applied towards any cost of operation, maintenance, repair, replacement or other expenses relating to the East Whiteland Trunk Line shall be

WASTEWATER BILLS FROM EAST WHITELAND TOWNSHIP
TO VFSA



**EAST
WHITELAND
TOWNSHIP**

209 Conestoga Road
Frazier, Pennsylvania 19355-1699
Township Office: 610.648.0600
Fax: 610.648.0388
Sewer Operations: 610.644.2985
www.eastwhiteland.org

BOARD OF SUPERVISORS

Virginia McMichael
Chairman

Michele Vaughn
Vice Chairman

P. Joseph Corrigan
Member

Terry H. Woodman
Township Manager

Virginia Fennimore
Assistant Township Manager

Gene Dooley
Chief of Police

William H. Steele
Public Works Director

Kenneth N. Bastin
Director of Codes & Life Safety

G. Eric Reed
Codes Enforcement Officer

October 20, 2003

23

Joseph Bateman, General Manager
Valley Forge Sewer Authority
333 Pawling Road
Phoenixville, PA 19460

Re: East Whiteland Township Trunk Line Operating Account


Dear Joe:

As you are aware, East Whiteland Township has not increased our charge for transmitting sewage flows from Charlestown Township to the Valley Creek Truck Line in about two decades.

To formalize the agreement reached between the Township and the Valley Forge Sewer Authority as Agent for Charlestown Township I have included the methodology that will be used for billing in 2004 onward. The amount billed will be based on the actual cost of operating East Whiteland Township's Sewer Department. To demonstrate how this will be calculated, enclosed you will find three tables, Table 1 shows actual costs, Table 2 shows the Yearly Contribution Calculation for each partner in the East Whiteland Trunk Line, and, Table 3 shows how the percent share of flow, pump station and meter usage was determined.

If the Township had used this billing for 2003, the new amount due would have been \$25,118.99, significantly higher than what you were billed this year. Due to changes in personnel I do not yet have an estimate for the actual costs for 2003, but I wanted to provide this information and the methodology so that you can program an increase into your 2004 budget. The amount will vary, based on the costs incurred by East Whiteland for operating the collection system. If you have questions about the numbers or the methodology, please call.

Sincerely,


Terry H. Woodman
Township Manager

Cc: Joe Boldaz
Bill Steele

Table 1- Estimated 2003 Operation, Maintenance And Administrative Expenditures
 East Whiteland Township
 East Whiteland Trunk Line Operating Account

<u>Salary and Wage Costs</u>	<u>Annual Cost</u>
Salaries and Commissions, General Government and Departmental Supervision	\$30,500.00
Salary and Wages, Non-Supervisory	\$105,099.00
Office Personnel	Not Applicable
Salary and Wages, Non-Supervisory- Originating in other Departments	\$1,137.00
FICA Contributions	\$13,420.00
Pension and Retirement Contributions	\$17,825.00
Life Insurance	\$3,771.00
Disability/Health/Medical Insurance	\$48,124.00
Unemployment Compensation/Drug and Alcohol Program	\$550.00
Longevity	\$2,990.00
Overtime	\$5,050.00
Subtotal	\$226,266.00
 <u>Operating Expenditures</u>	
Materials and Supplies	\$1,444.00
Small Items of Equipment	\$199.00
Vehicle Fuel	\$2,317.00
Clothing Allowance	\$2,205.00
Telephone Incl. Mobile Phones	\$11,219.00
Office Equipment Maintenance	\$1,344.00
Advertising, printing and postage	\$5,124.00
Workers Compensation	\$4,801.00
Misc. Expenditures	\$56,151.00
Subtotal	\$84,804.00
 <u>Fees, Professional and Other</u>	
Auditing Services	\$0.00
Engineering Services	\$71,783.00
Legal Services	\$7,753.00
Deeds of Dedication	\$0.00
Subtotal	\$79,536.00
 <u>Pump Station/Meter Pit</u>	
Pump Stations- Fuel, Light and Water	\$49,712.00
Pump Stations, Meter Pits-Maintenance and Repairs	\$29,168.00
Subtotal	\$78,880.00
 <u>Sanitary Sewer Collection System</u>	
Sewer System Maintenance and Repairs	\$10,397.00
Road Maintenance and Repairs	\$1,842.00
Equipment and tools-Maintenance and Repairs	\$2,102.00
Purchase of Major Equipment, including Vehicles	\$39,374.00
Purchase of Minor Equipment	\$3,951.00
Subtotal	\$57,468.00
 Total Expenditures	 \$528,952.00
Contingency (1)	\$52,695.20
Less Income from Investments	
Less State Subsidy Payment	
Net Contribution By Participants	\$579,647.20

(1) 10% Contingency In Accordance with Section 4.03 of the East Whiteland Trunk Line Agreement

Table 2 - Yearly Contribution Calculation
 East Whiteland Township
 East Whiteland Trunk Line Operating Account

Name of Participant	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)	(L)	(M) (H) * (N)
	Salary and Wage Costs	Operating Expenditures	Percent Share of Cost	Total & State Salary/Operating Expenditures	Pump Station (Meter P.L.)	Percent Share of PS and Meters	Percent Share of Flow	Total Share Pump Station/Meter P.L.	Sanitary Sewer Collection System	Percent Share of Flow	Percent Share of System	Total & State Sanitary Collection System	Total Yearly & Share Each Participant
Malvern Borough	(\$228,266.00	-\$84,804.00)	18.56%	\$31,409.86	(\$29,768.00	31.25%	18.56%)	\$1,509.05	(\$7,488.00	18.56%	3.04%)	\$363.33	\$33,374.25
Valley Forge Sewer Authority	(\$228,266.00	-\$84,804.00)	7.44%	\$23,148.83	(\$78,880.00	25.00%	7.44%)	\$1,467.48	(\$7,488.00	7.44%	11.76%)	\$502.90	\$25,118.99
East Whiteland Township													\$501,153.98

	VFA	Malvern	EW
Pump Station			
Five Road			
Sagelee			
Mill Lane			
Meadow View			
Deer Run			
Church Road			
Wesgate			
Widewater Road			
Millbrook Circle			
France Ave			
Wesport			
Walnut Ave			
East Glen			
Old Lincoln			
North Ridge			
Mathews			
Christown Drive			
Total			

Total Miles X X

	miles utility	% share
EW	xx	x
VF	xx	x
Malv	xx	x

to be added

**Table 3 - Estimated 2003 Contributions By Participants
 East Whiteland Township
 East Whiteland Trunk Line Operating Account**

<u>Name of Participant</u>	<u>Estimated Wastewater Flow (GPD) (1)</u>	<u>Percent Share of Wastewater Flow</u>	<u>Percent Share of Sanitary Sewer System</u>	<u>Percent Share of P.S. & Meters</u>	<u>Yearly Contribution</u>	<u>Quarterly Contribution</u>
East Whiteland Township	1,149,558.00	76.00%	100.00%	100.00%	\$501,153.96	\$125,288.49
Malvern Borough	250,409.00	16.56%	3.84%	31.25%	\$53,374.25	\$13,343.56
Valley Forge Sewer Authority	112,556.00	7.44%	11.76%	25.00%	\$25,118.99	\$6,279.75
Totals	1,512,523.00	100.00%			\$579,847.20	\$144,911.80

(1) Average Wastewater Flow from 2002 Monthly Flow Reports

4.01

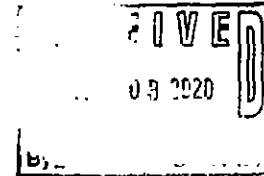


EAST WHITELAND TOWNSHIP
THE HEART OF GREAT VALLEY

209 Conestoga Road
Frazer, Pennsylvania 19355-1699
Telephone: 610-648-0600
www.eastwhiteland.org

Board of Supervisors: Susan Drummond • Scott Lambert • Richard Orlow Township Manager: John Nagel

February 28, 2020



Len Pinchok
Valley Forge Sewer Authority
333 Pawling Road
Phoenixville, PA 19460

RE: East Whiteland Township Trunk Line Operating Account

Dear Len:

Enclosed please find your second quarter sewer bill. To calculate this years' billing, I have used actual operation costs from 2019. This information is shown on Table 1. Table 2 shows the Yearly Contribution Calculation for each partner in the East Whiteland Trunk Line. And, Table 3 shows how the percent share of flow, pump station and meter usage was determined.

If you have any questions, please feel free to contact me at 610-897-4211.

Sincerely:

William H. Steele
Assistant Township Manager
Director of Public Works

Encl.

**Table 1- 2019 Operation, Maintenance and Administrative Expenditures
East Whiteland Township
East Whiteland Trunk Line Operating Account**

Salary and Wage Costs	2019 Actual	2018 Actual	2017 Actual	2016 Actual	2015 Actual
Salaries and Commissions, General Government and Department Supervision	\$ 133,162	\$ 127,788	\$ 118,533	\$ 103,837	\$ 81,862
Salary and Wages, Non-Supervisory	141,186	147,288	178,878	170,245	150,754
Office Personnel	143,879	146,892	82,904	79,841	75,053
Salary and Wages, Non-Supervisory-Originating in other Departments	22,831	7,447	8,079	3,507	2,582
FICA Contributions	38,186	35,776	30,211	28,397	27,367
Pension and Retirement Contributions	78,140	38,350	48,017	84,511	58,339
Life Insurance	1,748	1,883	1,403	1,398	1,346
Disability/Health/Medical Insurance	157,823	203,932	171,230	130,459	98,042
Unemployment Compensation/Drug and Alcohol Program	1,883	-	-	2,523	122
Longevity & Other Pay	8,718	10,812	12,689	8,828	9,087
Overtime	24,665	14,308	6,777	5,028	11,322
Subtotal	747,779	734,568	652,832	588,534	513,875
Operating Expenditures					
Materials and Supplies	3,148	1,388	2,999	1,982	4,278
Vehicle Fuel	7,582	8,914	7,611	8,661	8,593
Vehicle - Maint. & Repairs	3,333	8,521	4,085	8,193	7,333
Uniforms and Cleaning	2,314	2,092	3,125	3,422	3,698
Telephone Incl. Mobile Phones	14,070	12,899	12,412	12,298	12,896
Office Equipment Maintenance	838	780	1,928	667	625
Advertising, printing	3,857	3,270	3,848	3,851	3,432
Workers Compensation Insurance	8,723	7,291	7,352	10,118	8,581
Liability & Vehicle Insurance	37,065	30,350	28,428	28,160	28,239
Other Expenditures (Small Equip. Postage, Data Proc., Training, Comp. SW)	65,207	15,888	27,885	11,477	8,897
Subtotal	130,367	89,581	99,480	83,795	86,580
Fees, Professional, and Other					
Auditing Services	7,878	7,500	8,500	8,287	5,858
Engineering Services	14,534	72,710	26,344	58,010	64,598
Legal Services	10,862	16,810	13,073	21,129	58,218
Deeds of Dedication	-	-	-	-	-
Subtotal	33,274	96,920	57,917	87,426	129,702
Pump Station/Meter Pits					
Pump Stations-Utilities (Phones, Fuel Electric and Water)	88,097	85,609	84,883	85,347	88,616
Pump Stations, Meter Pits-Maintenance and Repairs	52,458	57,429	77,443	51,473	81,224
Subtotal	138,554	143,038	162,327	146,822	171,729
Sanitary Sewer Collection System					
Sewer System Maintenance and Repairs (excl. Mulvan Hunt system)	26,388	52,885	29,048	37,768	19,245
Road Maintenance and Repairs	-	-	-	-	-
Equipment and Tools-Maintenance and Repairs	315	39	1,215	284	-
Sewer Rentals - Aqua	-	-	-	-	-
Purchase of Major Equipment, including Vehicles	-	-	-	-	-
Purchase of Minor Equipment/Buildings	-	-	-	-	-
Subtotal	26,811	52,724	30,263	38,052	19,245
Total Expenditures	1,076,852	1,113,729	1,002,598	832,620	821,129
Contingency (1)	-	-	-	-	-
Less Income from Investments	-	-	-	-	-
Less State Subsidy Payment	-	-	-	-	-
Net Contribution by Participants	\$ 1,076,852	\$ 1,113,729	\$ 1,002,598	\$ 832,620	\$ 821,129

(1) 10% Contingency in Accordance with Section 4.03 of the East Whiteland Trunk Line Agreement

Table 2- Yearly Contribution Calculation (Using 12/31/19 Actual Expenses and Usage)

**East Whitland Township
East Whitland Trunk Line Operating Account**

Name of Participant	(A) Salary and Wage Costs	(B) Operating Expenditures	(C) Percent Share of Flow (1)	(D) Total \$ Share Salary / Operating Expenditures	(E) Pump Stations & Meter Pits	(F) Percent Share of PS and Meters (2)	(G) Percent Share of Flow (1)	(H) Total \$ Share Pump Station & Meter Pits	(I) Sanitary Sewer Collection System	(J) Percent Share of Flow (1)	(K) Percent Share Sewer System (3)	(L) Total \$ Share Collection Systems	(M) + (H) + (L) Total Annual \$ Share Each Partner	Quarterly \$ Share Each Partner
Malvern Borough	\$ 747,770	\$ 103,638	10.26%	\$ 148,157	\$138,554	8.77%	10.26%	\$ 1,970	\$ 26,081	10.26%	3.84%	\$ 187	\$ 150,299	\$ 37,574.81
Valley Forge Sewer Authority	\$ 747,779	\$ 103,638	8.51%	\$ 77,535	\$138,554	21.05%	8.51%	\$ 2,481	\$ 20,091	8.51%	11.78%	\$ 207	\$ 80,284	\$ 20,070.90
East Whitland Township													\$ 848,070	\$ 211,517.49
Total													\$ 1,076,663	\$ 289,163

(1) Percent of Flow (Updated 2/22/2020)

	12 month 2019 Actuals	% Share of Flow
East Whitland Township	1,740,058	75.74%
Malvern Borough	375,855	16.26%
VFSA-Charlestown	196,749	8.51%
Total	2,312,702	100.00%

	12-month 2018 Actuals	% Share of Flow
East Whitland Township	1,873,841	71.59%
Malvern Borough	377,527	14.84%
VFSA-Charlestown	192,636	7.57%
Total	2,544,004	100.00%

(2) Percent of Pump Stations and Meters

Pump Stations (as of 2020)	Malvern	VFSA	EWT
Church Road			1
Deer Run			1
Flat Road			1
Frame Ave			1
Hillbrook Circle		1	1
King Road			1
Meadow View			1
Mid Lane		1	1
Sidley Lee		1	1
Wingsome			1
Wilburale Road			1
Malvern Hunt			1
Lepp Road			1
Meters			
Charleston/Oaks		1	1
Charleston Meadows		1	1
Emm Glen	0.5		1
Mathews	0.5	1	1
North Ridge	0.5		1
Old Linton	0.5		1
Warren Ave	0.5		1
Total	2.5	0	20
% Share of PS and Meters	8.77%	21.05%	70.18%

(3) Percent of Sewer System Used

Percent of Pipeline Used (as of 2020)	
Malvern Borough	3.84%
Valley Forge Sewer Authority	11.78%

Table 3- Summary of 2020 Contributions By Partners

East Whiteland Trunk Line Operating Account

<u>Name of Partner</u>	<u>Actual</u> <u>2020 Annual Contribution</u>	<u>Actual</u> <u>2020 Quarterly Contribution</u>	<u>Prior Year Actual</u> <u>2019 Quarterly Contribution</u>
East Whiteland Township	\$ 846,070	\$ 211,517	\$ 225,769
Malvern Borough	\$ 150,299	\$ 37,575	\$ 34,597
<u>Valley Forge Sewer Authority (Charlestown)</u>	<u>\$ 80,284</u>	<u>\$ 20,071</u>	<u>\$ 18,067</u>
<u>Totals</u>	<u>\$ 1,076,653</u>	<u>\$ 269,163</u>	<u>\$ 278,433</u>

Goldfield
216 Vassar Ave,
Swarthmore, PA 19081

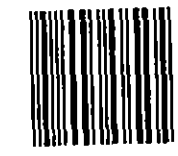
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FEB 16 2022

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

The Honorable Rosemary Chivetta
Secretary, PA Public Utility Commission
400 North Street
Harrisburg, PA 17120