



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

IN REPLY PLEASE
REFER TO OUR FILE

April 29, 2022

Docket No. A-2022-3030364
Utility Code 230073

TERESA K HARROLD ESQUIRE
PENNSYLVANIA AMERICAN WATER COMPANY
852 WESLEY DRIVE
MECHANICSBURG PA 17055
TERESA.HARROLD@AMWATER.COM

RE: Application of Pennsylvania-American Water Company – Wastewater Division for approval of the right to offer, render, furnish and supply wastewater service to the public in an additional portion of Elk Township, Clarion County, Pennsylvania

Dear Attorney Harrold:

On January 6, 2022, Pennsylvania-American Water Company – Wastewater Division (PAWC-WD) filed the above-captioned document with the Pennsylvania Public Utility Commission. For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

Please forward the information to the Secretary of the Commission at the address listed below **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

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

Please note your answers must be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], 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 held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature _____
Title _____
Date _____

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the review, please send a copy of the response to Matthew T. Lamb, P.E. in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at mlamb@pa.gov. Please also direct any questions to Matthew Lamb at telephone number (717) 783-1001. Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure: TUS Data Request Set 1

cc: Christine Hoover, Office of Consumer Advocate (w/enclosure), choover@paoca.org
Teresa Wagner, Office of Small Business Advocate (w/enclosure), tereswagne@pa.gov
Richard Kanaskie, Bureau of Investigation & Enforcement (w/enclosure), rkanaskie@pa.gov

TUS Data Request Set 1

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Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

- A-1. The Application's Section 8 indicated the requested territory abuts PAWC-WD's existing certificated service territory in Elk Township which was approved by the Commission in PAWC-WD's acquisition of the Shippenville Borough Wastewater System at Docket No. A-2014-2441953 (2014 Application). However, the existing territory boundaries depicted on the map included in the Application's Exhibit B-1 do not match the boundaries of the service territory depicted in Exhibit L of the Commission approved 2014 Application creating gaps and overlaps between them. Please respond to the following:
- a. Explain the apparent discrepancies between PAWC-WD's existing territory boundaries depicted on the map included in the Application's Exhibit B-1 and the boundaries of the approved certificated territory depicted in the 2014 Application's Exhibit L;
 - b. Provide a revised copy of the Application's Exhibits B-1 and B-2 to accurately depict and describe, by bearing angles and distances, the boundaries of PAWC-WD's existing certificated territory and adjust the boundaries of the requested territory to align with those of the adjacent existing territory; and
 - c. Quantify the area of the revised requested territory in acres.
- A-2. The list of customers requesting service in the Application's Exhibit C appear to include Parcel Nos. 08-020-010-001-00 and 08-020-008-000-00 (Requesting Customer Parcels). Additionally, PAWC-WD's requested territory also appears to include portions of Parcel Nos. 08-020-010-000-00, 29-020-075-001-00, 29-020-108-000-00 and the entirety of Parcel No. 08-020-007-000-00, which are located between PAWC-WD'S existing certificated territory and the Requesting Customer Parcels. Please explain why PAWC-WD included the four extra parcels as part of PAWC-WD's requested territory;
- A-3. Clarify whether PAWC-WD currently provides wastewater service to Parcel Nos. 08-020-010-001-00, 08-020-008-000-00, 08-020-010-000-00, 29-020-075-001-00, 29-020-108-000-00, or 08-020-007-000-00.
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- A-4. The Application's Section 14 indicated there are no additional easements or permits necessary to serve the requested additional territory. However, the Application's Exhibit D depicts the location of PAWC-WD's existing force main to be within rights -of-way of State Route 208 (SR 208). Please provide responses to the following:
- a. Clarify whether a PennDOT Highway Occupancy Permit will be required to install sewer laterals to connect to the force main; and

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- b. If permits and/or easements are needed to connect customers within the requested territory to either the force or gravity mains, please indicate the type of permit or easement, the filing status and estimated cost of these permits and/or easements.
- A-5. The Application’s Exhibit D included a copy of an aerial map entitled “SR 208 North Lift Station Area” that depicted the locations of the force main within SR 208 and the gravity main behind residential structures on the east side of SR 208. Please respond to the following:
 - a. Identify the size and material type of both the force and gravity wastewater mains that will provide service to the requested territory;
 - b. Provide copy of the easements acquired by PAWC-WD for the gravity main; and
 - c. Clarify whether the force or gravity main will be used by PAWC-WD to provide service for each customer requesting service identified in the Application’s Appendix C.
- A-6. The Application’s Exhibit E included a copy of a construction cost estimate to install two (2) gravity sewer laterals and one (1) pressure sewer lateral to the customers requesting service. Please respond to the following:
 - a. Provide a detailed breakdown of the material projected to be required for the installation of the company-owned portions of the sewer laterals including size, material type and quantity;
 - b. Clarify if the estimated construction costs identified for the residential customer connections include both the customer-owned and company-owned sections of the sewer lateral or only the company-owned portion;
 - c. If PAWC-WD intends to furnish and install both the customer-owned and company-owned sections of the sewer laterals, please explain how it complies with PAWC-WD’s effective wastewater tariff;
 - d. Provide the approximate timeframe for the installation of the service laterals and indicate when PAWC-WD would commence service to the requested additional territory; and
 - e. Explain how PAWC-WD anticipates it will finance its costs to serve the requested additional territory (e.g., short-term debt, etc.).
- A-7. The Application’s Exhibit F included a copy of the Pennsylvania Department of Environmental Protection (DEP)-approved Sewage Facilities Planning Module for Maple Drive & SR 208 Lift Stations, prepared by Gwin, Dobson & Foreman, Inc., dated January 2019, revised April 2019, (Planning Module) and the approval letter from DEP for the

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Sewage Facilities Planning Module for Maple Drive & SR 208-North Lift Station Replacements, dated July 25, 2019, (Planning Module Approval Letter). Both the Planning Module and Planning Module Approval Letter indicated the SR 208-North lift station replacement will provide an additional 42 Equivalent Dwelling Units (EDUs) at 250 gallons/EDU for a total capacity of 48 EDUs. Please respond to the following:

- a. Identify the parcels, by number, depicted on a map that collectively make up the 42 EDUs contemplated as the Evergreen Drive expansion area in the Planning Module;
 - b. Provide evidence that the Requesting Customer Parcels were included as part of the Planning Module;
 - c. Provide a copy of the preliminary engineering report prepared by Koppel Engineers for Elk Township referenced on Page 23 of the Planning Module;
 - d. Provide the date when the SR 208 North Lift Station replacement was placed into service;
 - e. Indicate whether the existing SR 208 Lift Station (a.k.a. School St. Pump Station) was removed from utility plant in service and provide the effect, including salvage, on the net utility plant in service balance;
 - f. Provide the current number of EDUs served by the SR 208-North Lift Station; and
 - g. Provide the projected number of EDUs assigned to each of the Requesting Customer Parcels.
- A-8. Please provide a copy of PAWC-WD's most recent Chapter 94 Municipal Wasteload Management Report for Paint-Elk Wastewater Treatment Plant and Collection System submitted to DEP.
- A-9. Please provide the permitted treatment capacity and maximum month flow of PAWC-WD's Paint-Elk Wastewater Treatment Plant.
- A-10. Please provide a copy of the DEP-approved Water Quality Management Parts I and II permits for the SR 208 North Lift Station.
- A-11. Please indicate whether Elk Township has a mandatory sewer connection ordinance that applies to the Application's requested territory.
- A-12. Please indicate whether PAWC-WD and/or Elk Township will require the installation of grinder pumps by customers in the Application's requested territory. If Elk-Township

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has a mandatory grinder pump ordinance, provide a copy of the approved grinder pump ordinance.

A-13. Please state whether PAWC-WD has adequate wastewater collection, conveyance treatment and disposal capacities to meet present and future customer demands in the Application's requested territory

A-14. Please explain how approval of the Application would benefit existing PAWC-WD customers.