



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

IN REPLY PLEASE  
REFER TO OUR FILE

July 19, 2022

Docket No. A-2022-3031502  
Utility Code 230240

THOMAS T NIESEN P NASE ESQUIRE  
THOMAS NIESEN AND THOMAS LLC  
212 LOCUST STREET SUITE 302  
HARRISBURG PA 17101  
TNIESEN@TNTLAWFIRM.COM

RE: Application of Aqua Pennsylvania Wastewater Inc., for approval to provide wastewater service to the public in an additional portion of Mount Joy Township, Adams County, Pennsylvania, at Docket No. A-2022-3031502

Dear Attorneys Niesen:

On March 21, 2022, Aqua Pennsylvania Wastewater Inc. (APW) filed the above-referenced documents with the Pennsylvania Public Utility Commission. To assist the Commission in conducting the review of these filings, 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. Make sure to reference the Docket Number listed above when filing your response. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>. All documents requiring notary stamps must have original signatures.

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

**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 application, please send a copy of your response to Clinton McKinley in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at [cmckinley@pa.gov](mailto:cmckinley@pa.gov). Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta  
Secretary

Enclosure: TUS Data Request Set 1

cc: Patrick M. Cicero, Office of Consumer Advocate (w/enclosure) [pcicero@paoca.org](mailto:pcicero@paoca.org)  
Teresa Wagner, Office of Small Business Advocate (w/enclosure) [tereswagne@pa.gov](mailto:tereswagne@pa.gov)  
Richard Kanaskie, PUC Bureau of Investigation and Enforcement (w/enclosure) [rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)  
Susan J. Smith, The Law Office of Susan J. Smith (w/enclosure) [ssmith@sjsmithlaw.com](mailto:ssmith@sjsmithlaw.com)

## TUS Data Request Set 1

Application of Aqua Pennsylvania Wastewater Inc., for approval to provide wastewater service to the public in an additional portion of Mount Joy Township, Adams County, Pennsylvania at Docket No. A-2022-3031502

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 at Page 2 indicated The Links of Gettysburg Land Company (Builder) will fund and install approximately 4,844 feet of SDR-26 plastic gravity main (Extension Project). Please identify the intended diameter of this material by length.
- A-2 The Application at Page 2 also indicated that the preliminary estimated cost to install the Extension Project is \$1,007,000. Please provide a detailed breakdown of the estimated cost to install the Extension Project by major plant category.
- A-3 The Application's Attachment D consisted of a copy of a letter from the Mount Joy Township Board of Supervisors (MJT Supervisors) dated February 18, 2022, that indicated a subdivision plan titled "The Links at Gettysburg Planned Golf Community – Preliminary Subdivision Plan for Wade Run Community" (Wade Run) is pending before the MJT Supervisors. Please provide an update on the subject plan's approval status along with a copy of any municipal approval letters evidencing the referenced subdivision plan received preliminary or final approval from the MJT Supervisors.
- A-4 Much of the text on the two plans depicting the preliminary subdivision and associated utilities in the Application's Attachment F is not legible. Please provide a legible copy of the two plans that are in vector graphics form.
- A-5 The plan provided as Attachment F appears to depict wastewater mains and laterals located in the rear portions of the proposed properties, outside of any designated right-of-way. Please indicate:
- a. If APW has approved the proposed locations of the wastewater mains and laterals;
  - b. How the proposed location of these mains and laterals is compliant with Section D.2. of APW's effective tariff which relies on the existence of a curb or curb line; and
  - c. If the location of the proposed laterals complies with the current definition of Company Service Lateral in APW's effective tariff or indicate if the current definition will need to be altered to accommodate the location of these proposed laterals.

## TUS Data Request Set 1

Application of Aqua Pennsylvania Wastewater Inc., for approval to provide wastewater service to the public in an additional portion of Mount Joy Township, Adams County, Pennsylvania at Docket No. A-2022-3031502

- A-6 The Application at Page 2 indicated flows from the requested service territory will be conveyed via gravity mains to an existing eight-inch diameter SDR-35 gravity main stubbed out from the collection system servicing the “Garrison Falls” community, to an existing pump station sized to convey 120,000 gallons per day (GPD) and eventually to The Links Wastewater Treatment Plant (WWTP). Attachment C – Sewage Pump Stations, of APW’s 2020 Chapter 94 Report indicated flow from “Garrison Falls” community travels via gravity main to The Links WWTP. Please provide the following information.
- a. Identify the referenced pump station;
  - b. Clarify the proposed route and method of conveyance (i.e., gravity, force main, etc.) for wastewater flow from the requested service territory to The Links WWTP;
  - c. Provide evidence the pump station’s current capacity is adequate to handle the additional flow to be generated from the requested service territory; and
  - d. Identify any upgrades required for the pump station to handle additional flows from the requested service territory.
- A-7 Adams County Parcel Identification Number 30G18-0010---000 appears to be included in the requested service territory and appears to include an existing structure. Please confirm the noted parcel is to be included in the requested service territory and identify the intended future use its structure. Additionally, identify if APW intends to or has received a request to provide wastewater service to this property.
- A-8 The Application at Pages 3-4 indicated The Links at Gettysburg development (The Links) will include of a total of 467 existing and planned connections to be incrementally constructed between 2021 and 2025. The Application’s Attachment H identified 457 total lots and APW’s 2020 Chapter 94 Municipal Wasteload Management Report (Chapter 94 Report) filed with the Department of Environmental Protection, provided as the Application’s Attachment K identified 504 connections at full build out in that same time period. Please clarify the total number of lots to be included in The Links and the total number of connections anticipated to be connected to the wastewater treatment plant serving The Links, by connections per year, for the years 2021 through 2025, and revise the Application’s Exhibit H if necessary.
- A-9 Please provide a copy of APW’s 2021 Chapter 94 Report filed with the Department of Environmental Protection (DEP).
- A-10 Please provide a copy of National Pollutant Discharge Elimination System Permit Number PA02416484 and Water Quality Management (WQM) Permit Number 0102404, referenced in the Application at Page 3.

## TUS Data Request Set 1

Application of Aqua Pennsylvania Wastewater Inc., for approval to provide wastewater service to the public in an additional portion of Mount Joy Township, Adams County, Pennsylvania at Docket No. A-2022-3031502

- A-11 The Application at Page 4 indicated that the Builder retained an engineer to complete the wastewater treatment plant expansion design (Links WWTP Expansion), and to prepare and submit a WQM Part II application to DEP. Please clarify if a separate WQM Permit will be required for the construction of the collection system within the requested service territory and identify the timeline and entity responsible for obtaining this WQM Permit, if necessary.
- A-12 The Application at Page 4 also indicated the preliminary estimated cost of the Links WWTP Expansion is \$1,400,000. Please describe the Links WWTP expansion project scope of work and provide a detailed breakdown of the estimated cost of the Links WWTP Expansion by major plant category and identify the components of The Links WWTP proposed to be upgraded or constructed to handle anticipated additional flows.
- A-13 The Application's Attachment G consisted of a copy of a Standard Form of Aqua's Builder's Extension Agreement which included an Attachment C "Preliminary Cost Estimate for Extension Project. Please provide a *pro forma* copy of Attachment C identifying estimated values for the subparts a. through d. addressing Construction Cost to Builder, Aqua Administration Fee, Aqua Value-added Fee, and Total Project Cost to Builder.
- A-14 The Application's Attachment I consisted of a copy of a Standard Form of Aqua's Builder's Wastewater Treatment Facilities Expansion Agreement which included an Attachment B "Preliminary Cost Estimate for Extension Project. Please provide a *pro forma* copy of Attachment B identifying estimated values for the subparts a. through d. addressing Construction Cost to Builder, Aqua Administration Fee, Aqua Value-added Fee, and Total Project Cost to Builder.
- A-15 Please quantify any un-reimbursable expenses APW will or may incur as a result of entering the proposed Standard Form of Aqua's Builder's Extension Agreement, and separately, those resulting from entering the proposed Standard Form of Aqua's Builder's Wastewater Treatment Facilities Expansion Agreement.
- A-16 Please provide an updated estimate of annual revenue from providing wastewater service within the requested service territory using APW's current Rate Zone 3 rates identified in its effective tariff.
- A-17 Please explain how approval of the Application would benefit existing APW customers.
- A-18 Please explain how approval of the Application would be in the public interest.