

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	Docket No. R-2022-3031672 (Water)
	:	Docket No. R-2022-3031673 (Wastewater)
	:	
vs.	:	
	:	
PENNSYLVANIA AMERICAN WATER COMPANY	:	
	:	

**DIRECT TESTIMONY AND EXHIBITS OF ROBERT J. MAY ON BEHALF OF THE
BOROUGH OF ST. LAWRENCE, BERKS COUNTY, PENNSYLVANIA**

KOZLOFF STOUDT
Professional Corporation
By: Joan E. London, Esquire
Attorney I.D. #67934
2640 Westview Drive
Wyomissing, PA 19610
(610) 670-2552
Solicitors for the Borough of
St. Lawrence, Berks County

DIRECT TESTIMONY OF ROBERT J. MAY

1 **Q. Please state your full name.**

2 **A.** Robert J May

3 **Q. Do you currently hold any offices in the Borough of St. Lawrence?**

4 **A.** I am the current Borough of St. Lawrence Council President.

5 **Q. How long have you served on Borough Council?**

6 **A.** I've served on Borough Council since 1991.

7 **Q. Do you hold any professional licenses or certifications?**

8 **A.** Yes. I am a Professional Engineer in Pennsylvania (#043392R), and a
9 Pennsylvania Department of Environment Protection (PADEP) Wastewater
10 Operator (#S12382, A, E, 1, 2, 3,). I am also a licensed wastewater operator in
11 New Jersey, Maryland, and Texas.

12 **Q. Is the Borough of St. Lawrence served by public sanitary sewer?**

13 **A.** Yes.

14 **Q. As a member of Borough Council, do you have any familiarity with the**
15 **Borough's public sanitary sewer system?**

16 **A.** Yes.

17 **Q. Please describe generally the Borough's sewer system.**

18 **A.** The Borough owns a sanitary collection system that enters the PA American
19 collection system, which formerly was owned by Exeter Township prior to the
20 sale to PA American. The collection system conveys the wastewater to the PA

1 American wastewater treatment plant, which also was formerly owned by Exeter
2 Township.

3 **Q. Are you familiar with the manner in which the Borough is billed for use of the**
4 **PA American collection system and wastewater treatment plant.**

5 **A.** Yes, I am familiar with the manner of billing. Since the 1960s until the time of the
6 sale of the system, the Borough had agreements in place with Exeter Township
7 for the manner of billing and formula for charges, based upon the Borough's
8 contributions to the plant's and system's construction and expansion over time,
9 and we now have an agreement with PA-American. The Borough is classified as
10 a bulk user of the PA American wastewater system and plant. The Borough is
11 billed monthly and directly pays PA-American. The Borough then, in turn,
12 invoices Borough property owners connected to the system. The PA American
13 collection system to which I am referring is the collection system previously
14 owned by Exeter Township.

15 **Q. You referenced the Borough's collection system as connecting to the PA-**
16 **American collection system formerly owned by Exeter Township. Could you**
17 **please describe the Borough's collection system?**

18 **A.** The Borough collection system has a length of approximately 45,566 linear feet.
19 A portion of the Borough collection system, approximately 2,463 linear feet, also
20 conveys a portion of the PA-American wastewater from a section of Exeter
21 Township and a portion of Alsace Township.

1 **Q. I have what we will mark as Borough of St. Lawrence Exhibit 1. Could you**
2 **please identify this for us?**

3 **A.** Borough of St. Lawrence Exhibit 1 is a map which shows the collection system,
4 including sewer lines and mains, and manhole locations. It shows that nearly
5 all of the properties in the Borough are connected to the public sanitary sewer
6 system, so nearly all of the properties would be impacted by a rate increase. It
7 also shows areas where the Borough has performed recent maintenance work on
8 the collection system.

9 **Q. Does the Borough charge PA-American for the use of the 2,463 linear feet in**
10 **the Borough's collection system.**

11 **A.** No. The Borough does not charge any fee to PA American for their wastewater
12 that is conveyed by the Borough collection system.

13 **Q. I would like to discuss further with you the maintenance work that the**
14 **Borough has performed, that is shown in Borough Exhibit 1. Could you tell us**
15 **what was done, and the reasons for this work?**

16 **A.** Since 2009, the Borough has a performed an extensive program to identify and
17 rectify infiltration and inflow, which I will refer to as "I&I." This program was
18 developed to prevent stormwater or groundwater from entering the Borough
19 collection system. The program utilized portable wastewater flow meters. The
20 meters were used to calculate wastewater flows in sectionalized portions of the
21 collection system, especially during rain events. Any I&I wastewater is
22 additional wastewater that is not measured as the wastewater quantity

1 calculated by water meter readings on the buildings in the Borough. The
2 Borough paid an additional fee for the I&I wastewater entering the Exeter
3 system, as it would do now if I & I entered the PA American wastewater system.
4 The Borough has a fiduciary responsibility to minimize I&I since this a
5 controllable cost which also reduces the wastewater quantity processed by the
6 wastewater treatment plan. The Borough wastewater I&I program was
7 developed in response to historic concerns of I&I within the Borough wastewater
8 system and the previous Exeter Township wastewater system. The program was
9 developed as a 20 year plan where the Borough wastewater collection system
10 would be televised and any defective collection pipes or manholes would be
11 repaired. Work was performed in 2010 where the entire system was televised
12 and corrections such as new pipe epoxy liner installations were performed. The
13 system was televised a second time in 2021 and additional repairs, including new
14 piping epoxy liner installations, were performed. It should be noted that any
15 piping repairs in 2010 were not in need of repair in 2021. This program will be
16 repeated in 2030, where it is anticipated that the televising will present any
17 piping segments that were not repaired in 2010 and 2021, may be in need of
18 repair. In 2030, it is anticipated the entire Borough wastewater collection system
19 will have been relined.

20 **Q. What do you believe will be the result of the Borough's program to reduce I &**
21 **I in its collection system?**

1 A. The Borough's I&I program will have rehabilitated the entire wastewater
2 collection system, essentially presenting a completely rehabilitated collection
3 system in 2030. The rehabilitation program in 2030 will have extended the
4 wastewater collection system life by a minimum of 30 years.

5 Q. **On behalf of the Borough, what is the Borough's position on the fairness of**
6 **this rate increase for Borough rate payers?**

7 A. The current PA American rate increase is presented as a requirement for the
8 collection system upgrades due to I&I issues and wastewater plant upgrades.
9 From the perspective of the Borough, this rate increase incorporates costs for the
10 PA American collection system for PA American I&I, formerly Exeter I & I, that
11 is not the burden of the Borough. The Borough wastewater flows through one
12 main PA American collection pipe from the Borough collection system endpoint
13 to the wastewater treatment plant. The total length of travel is estimated at 26,100
14 linear feet which is approximately 3.75% of the entire approximate 660,000 linear
15 feet and 3,108 manholes of the PA American collection system. **Borough citizens**
16 **should not have to contribute to the maintenance and upgrade of the entire PA**
17 **American collection system that was the previous Exeter Township wastewater**
18 **collection system. The Borough requests the PUC to intervene and advocate**
19 **for proper fees that reflects the information presented.**

20 Q. I have what we will mark as Borough Exhibit 2. Could you identify that for
21 us?

1 **A.** **This is a summary of the composition of the Borough’s collection system,**
2 **including the types of pipe, and the work we have done on the system, and the**
3 **three phases of lining projects that the Borough has done for both manholes**
4 **and lines. The Borough has lined nearly half of the manholes and pipe in the**
5 **system.**

6 **Q.** **Why do you believe that the Borough’s history of system maintenance should**
7 **bear on the rate increase impacting Borough residents.**

8 **A.** The rate increase does not differentiate any charges for the costs of upgrades to
9 the PA American wastewater plant that was previously owned by Exeter
10 Township. The Borough and Exeter Township, since 1961, had a wastewater
11 plant operation agreement, where the Borough was a minority financing partner.
12 The Borough contributed 6% of all capital costs for the wastewater treatment
13 plant, including the initial build and subsequent upgrades. This agreement also
14 incorporated wastewater treatment plant operational costs, where the Borough
15 paid a proportion fee, based on a percentage of wastewater treated. This
16 agreement became moot when Exeter Township sold the wastewater collection
17 system and wastewater treatment plant to PA American in 2019.

18 **Q.** **Is there a course of action that you are requesting from the PUC on behalf of**
19 **St. Lawrence residents?**

20 **A.** The Borough requests the PUC to require PA American to disclose the
21 individual items that comprise the rate increase so that the items specific to the
22 maintenance and upgrade to the wastewater treatment can be presented.

1 **Borough citizens should contribute only a proportional amount of the**
2 **wastewater plant upgrade costs referencing the quantity of Borough**
3 **wastewater treated compared to the total quantity of wastewater treatment.**
4 **Specifically, the Borough requests the PUC to intervene and advocate for**
5 **proper fees that reflects the information presented.**

KOZLOFF STOUDT
Professional Corporation
By: Joan E. London, Esquire
Attorney I.D. #67934
2640 Westview Drive
Wyomissing, PA 19610
(610) 670-2552

SOLICITORS FOR THE BOROUGH OF
ST. LAWRENCE, BERKS COUNTY

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	Docket No. R-2022-3031672 (Water)
	:	Docket No. R-2022-3031673 (Wastewater)
	:	
vs.	:	
	:	
PENNSYLVANIA AMERICAN WATER COMPANY	:	
	:	

VERIFICATION

I, Joan E. London, Esquire, hereby certify that I am Solicitor for the Borough of St. Lawrence, Berks County, and that I am authorized to take this Verification on behalf of the Borough, and that the statements herein are true and correct to the best of my knowledge, information, and belief. I understand that false statements herein are subject to the penalties of 18 Pa.C.S.A. Section 4904, relating to unsworn falsification to authorities.

Dated: July 29, 2022

KOZLOFF STOUDT
Professional Corporation



Joan E. London, Esquire

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

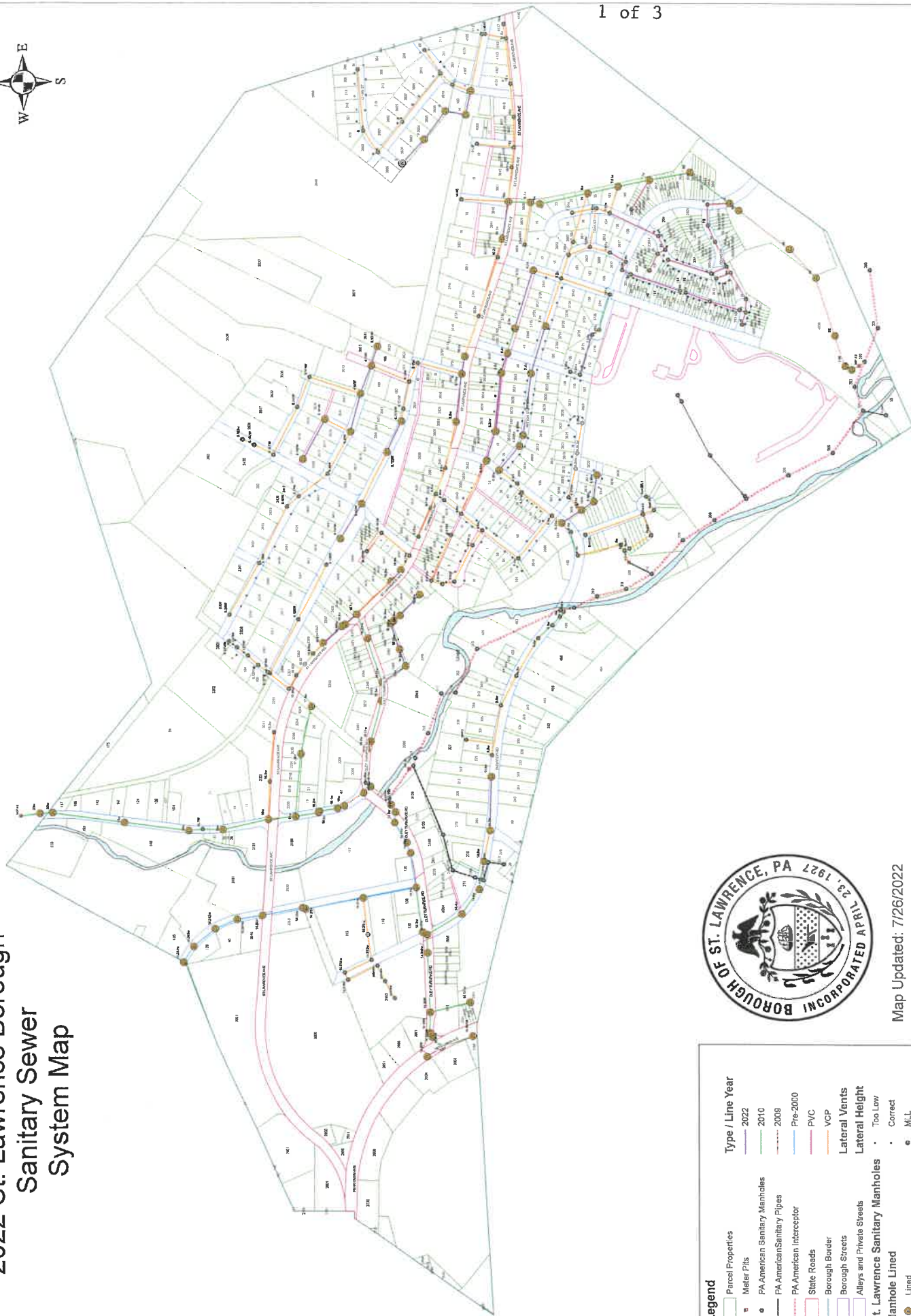
PENNSYLVANIA PUBLIC UTILITY : Docket No. R-2022-3031672 (Water)
COMMISSION : Docket No. R-2022-3031673 (Wastewater)
:
vs. :
:
PENNSYLVANIA AMERICAN :
WATER COMPANY :

**EXHIBITS TO DIRECT TESTIMONY OF ROBERT J. MAY ON BEHALF OF THE
BOROUGH OF ST. LAWRENCE, BERKS COUNTY, PENNSYLVANIA**

KOZLOFF STOUT
Professional Corporation
By: Joan E. London, Esquire
Attorney I.D. #67934
2640 Westview Drive
Wyomissing, PA 19610
(610) 670-2552



2022 St. Lawrence Borough Sanitary Sewer System Map



Map Updated: 7/26/2022



Legend	
	Parcel Properties
	Meter Pits
	PA American Sanitary Manholes
	PA American Sanitary Pipes
	PA American Interceptor
	State Roads
	Borough Border
	Borough Streets
	Alleys and Private Streets
	St. Lawrence Sanitary Manholes
	Manhole Lined
	Lined
	No
	MLL
	MLL Pipes
	Antietam Creek 2004
	Type / Line Year
	2022
	2010
	2009
	Pre-2000
	PVC
	VCP
	Lateral Vents
	Lateral Height
	Too Low
	Correct
	MLL
	MLL Pipes
	Antietam Creek 2004

St. Lawrence Borough Sanitary Sewer System

Total Linear Footage of System: 45,566 Linear Feet

8" Pipe : 39,500 Linear Feet

10" Pipe: 3,603 Linear Feet

12" Pipe: 2,463 Linear Feet

Pipe Types:

VCP (Clay): 41,231 Linear Feet (90.5%)

PVC: 4,335 Linear Feet (9.5%)

Lining Projects:

Pre-2000: 2,254 Linear Feet (4.9%)

2009-2010: 10,461 Linear Feet (22.9%)

2022: 6,978 Linear Feet (15.3%)

Total Lined: 19,963 Linear Feet (43.2%)

Total Number of Manholes: 243

Manholes Lined: 109 (44.8% Lined)

Other System Notes:

Entire System (45,566 Linear Feet) was cleaned and televised in Summer of 2021 by CO-STARS contractor Mr. Rehab. 50 Manholes received inspections.

Exeter System Travels: 2,463ft in our system

**Furthest Travel in Exeter from our System to Sewer Plant:
~ 26,100 Feet**