



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

IN REPLY PLEASE
REFER TO OUR FILE

December 13, 2022

Docket No. R-2022-3037141
Utility Code 230240

ERIN M FEENEY
AQUA PENNSYLVANIA WASTEWATER INC
762 W LANCASTER AVENUE
BRYN MAWR PA 19010
EFDOMZALSKI@AQUAAMERICA.COM

RE: Aqua Pennsylvania Wastewater, Inc. Supplement No. 3 to Tariff Sewer-PA P.U.C. No. 3
at Docket No. R-2022-3037141

Dear Ms. Feeney:

On December 7, 2022, Aqua Pennsylvania Wastewater, Inc. (APW) 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 **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's 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:

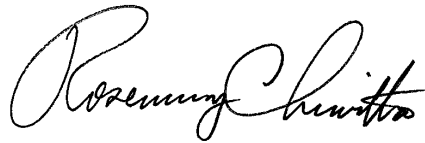
I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made 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 Paul Zander in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at pzander@pa.gov. Please also direct any questions to Paul Zander at telephone number (717) 783-1372. 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
NazAarah Sabree, Office of Small Business Advocate (w/enclosure), nsabree@pa.gov
Richard Kanaskie, Bureau of Investigation & Enforcement (w/enclosure), rkanaskie@pa.gov

TUS Data Request Set 1

Aqua Pennsylvania Wastewater, Inc. Supplement No. 3 to Tariff Sewer-PA P.U.C. No. 3 at
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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.

- R-1. Supplement No. 3 to Tariff Sewer-PA P.U.C. No. 3 (Supplement No. 3) specifies that Rider LWCUR is available to “a customer or prospect Large Wastewater customer that [...] [d]ischarges wastewater [...] resulting from industrial processes.” It appears that APW may have intended to indicate that Rider LWCUR is available to a current or prospective Large Wastewater Customer (i.e., where “Large Wastewater” is a condition of rate eligibility), rather than a customer (i.e., any customer) or a prospective Large Wastewater Customer. Please confirm that Rider LWCUR is only available to current or prospective Large Wastewater Customers, or clarify that Rider LWCUR is available to any Customer that discharges wastewater resulting from industrial processes, notwithstanding whether they are a Large Wastewater Customer.
- R-2. If Rider LWCUR is only available to current or prospective Large Wastewater Customers, please provide a copy of a revised Supplement No. 3 that replaces the terms “customer or prospect Large Wastewater customer” and “customer or prospective Large Customer” with “current or prospective Large Wastewater customer.”
- R-3. Supplement No. 3 does not define the term “Large Wastewater customer” or “Large Customer.” Also, 52 Pa. Code § 53.25 requires public utilities to provide definitions of technical terms used in tariffs, and 52 Pa. Code § 53.26(a) requires each rate schedule to set forth explicitly the conditions under which a service covered by rates is available. Please provide a copy of a revised Supplement No. 3 that includes definitions for the terms “Large Wastewater customer” and “Large Customer.” These definitions must set forth explicitly the conditions under which a Customer would be considered a Large Wastewater Customer or Large Customer (e.g., annual revenue/usage greater than a specified dollar amount, etc.). Please note that failure to provide definitions of technical terms used in Supplement No. 3 and to set forth explicitly in Supplement No. 3 the conditions under which a service covered by rates is available may result in rejection of Supplement No. 3 in accordance with 52 Pa. Code § 1.38.
- R-4. Supplement No. 3 defines “variable Wastewater Treatment Cost” as “electric power and any chemical costs not otherwise covered by any applicable surcharges for BOD, TSS, etc.” Please provide a detailed breakdown of APW’s current variable Wastewater Treatment Cost quantified in dollars.
- R-5. Please explain why APW does not consider wastewater conveyance and treatment costs imposed by third parties, including expenses recorded under National Association of Regulatory Utility Commissioners Uniform System of Accounts (NARUC USOA) Account No. 710 – Purchased Wastewater Treatment (i.e., wastewater systems where APW conveys wastewater to a third party for conveyance and/or treatment), to be a variable Wastewater Treatment Cost.

TUS Data Request Set 1

Aqua Pennsylvania Wastewater, Inc. Supplement No. 3 to Tariff Sewer-PA P.U.C. No. 3 at
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- R-6. Please explain why APW does not consider sludge removal and disposal expenses, including expenses recorded under NARUC USOA Account No. 711 – Sludge Removal Expense, to be a variable Wastewater Treatment Cost.
- R-7. Please explain why APW does not consider fuel for power production, including expenses recorded under NARUC USOA Account No. 716 – Fuel for Power Production, to be a variable Wastewater Treatment Cost.