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Pennsylvania Public Utility  
Commission, et. al.,

v.

Aqua Pennsylvania  
Wastewater, Inc.,

and

Richard Adams

v.

Aqua Pennsylvania  
Wastewater, Inc.,

Telephonic Evidentiary  
Hearing  
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Pages 29 - 132

Docket Nos.:  
R-2022-3036634/  
C-3037266

Judges' Chambers  
State Office Building  
801 Market Street  
Philadelphia, PA

February 23, . 2023  
Commencing 10:03 a.m.

INDEX TO EXHIBITS

Docket Nos. R-2022-3036634/C-2022-3037266

Hearing Date: February 23, 2023

NUMBER

FOR IDENTIFICATION

IN EVIDENCE

Complainant Exhibit 1

Richard Adams

Written Testimony                      114                      114

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Docket Nos. R-2022-3036634/C-2022-3037266

Hearing Date: February 23, 2023

NUMBER                      FOR IDENTIFICATION                      IN EVIDENCE

RESPONDENT EXHIBIT:

Aqua Statement 1

Erin Feeney Direct

Written Testimony                      80                      86

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Erin Feeney Rebuttal

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FOR THE INTERVENOR:

LMT Statement 1

Direct Testimony

of James Majewski

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LMT Statement 2

Written Testimony of

Greg Hucklebridge

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**Via Email**

February 6, 2023

Honorable Darlene Heep  
Administrative law Judge  
Office of Administrative Law Judge  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
[dheep@pa.gov](mailto:dheep@pa.gov)  
[sdelvillar@pa.gov](mailto:sdelvillar@pa.gov)

**RE: PA PUC v. Aqua Pennsylvania Wastewater, Inc.  
PUC Docket No. R-2022-3036634**

***Richard Adams v. Aqua Pennsylvania Wastewater, Inc.  
PUC Docket No. C-2022-3037266***

Dear Judge Heep,

Attached please find the Direct Testimony submitted on behalf of Richard Adams  
in the above-referenced proceeding:

Richard Adams Statement No. 1      Direct Testimony of Richard Adams

Sincerely,

S / Richard Adams

Richard Adams  
221 Taylorsville Road  
Yardley, PA 19067  
[urbroa@hotmail.com](mailto:urbroa@hotmail.com)

Enclosure

cc: Rosemary Chiavetta, Secretary (Letter and Certificate of Service only)  
Certificate of Service

**BEFORE THE**  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
PA PUC v. AQUA PENNSYLVANIA:  
WATERWATER, INC.: DOCKET NO: R-2022-3036634

:  
v.:  
:

RICHARD ADAMS v.:  
AQUA PENNSYLVANIA: DOCKET NO: C-2022-3037266  
WASTEWATER, INC.:

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document, Richard Adams,  
Richard Adams Statement No. 1  
Direct Testimony of Richard Adams, upon the persons and in the manner set forth below:

Via Email:

Honorable Darlene Heep  
Administrative law Judge  
Office of Administrative Law Judge  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
[dheep@pa.gov](mailto:dheep@pa.gov)  
[sdelvillar@pa.gov](mailto:sdelvillar@pa.gov)

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Yardley, PA 19067  
[dtruelove@hillwallack.com](mailto:dtruelove@hillwallack.com)

Mary McFall Hopper, Esquire  
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762 W. Lancaster Avenue  
Bryn Mawr, PA 19010  
(610) 645-1170  
[mmhopper@aquaamerica.com](mailto:mmhopper@aquaamerica.com)

Dated: February 6, 2023

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PA PUC v. AQUA PENNSYLVANIA WASTEWATER, INC.:  
DOCKET NO: R-2022-3036634

;  
&  
:

RICHARD ADAMS v.:  
AQUA PENNSYLVANIA WASTEWATER, INC.:  
DOCKET NO: C-2022-3037266

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**DIRECT TESTIMONY OF  
RICHARD ADAMS**

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DATE SERVED: February 6, 2023  
DATE ADMITTED: \_\_\_\_\_

Richard Adams **Statement No. 1**

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I. INTRODUCTION AND PURPOSE OF TESTIMONY .....

II. PROPOSED TARIFF SUPPLEMENT .....

III. CONCLUSION .....

1. **I. INTRODUCTION AND PURPOSE OF TESTIMONY**

2. Q. What is my Name and Home Address?

3. A. Richard Adams, 221 Taylorsville Rd. Yardley, PA 19067-1329

4. Q. Are you a customer of Aqua Pennsylvania Waste Water Inc.?

5. A. I am. Yes

6. Q. What is my status?

7. A. I am retired.

8. Q. Why am I providing this direct Testimony?

9. A. To obtain a favorable ruling in a court of record to require Aqua  
10. Pennsylvania Waste Water Inc. to notify all customers of any proposed  
11. rate change that would affect them if approved. 66 Pa. C.S.A. § 1308

12. To obtain a favorable ruling to require Aqua to not discriminate in Rates 66  
13. Pa. C.S.A. § 1304. To not discriminate in service 66 Pa. C.S.A. § 1502, 66  
14. Pa. C.S.A. § 1505.

15. **II. PROPOSED TARIFF SUPPLEMENT CHANGES**

16. Q. Why do you suggest that 66 Pa. C.S.A. 1308 requires the Company to  
17. notify all their customers in Rate Zone 7, Rate Zone 10 and Rate Zone 12?

18. A. With currently approximately 22,215 customers in the three rate zones minus  
19. approximately 832 customers with deduct water meters that leaves about  
20. 21,383 customers that were not notified of a way to avoid a waste water charge  
21. for usage not going to a waste water facility. With this very high percentage not  
22. made aware of a rate change the Company must communicate to the PAPUC that  
23. in all fairness that they are notifying all customers of the proposed rate filing.

1. Q. Why do you suggest by this rate change filing the company is discriminating
2. By rate and by service? 66 Pa. C.S.A. 1304, 1502, & 1505
3. A. By filing for a rate change for a portion of customers and restricting the rate
4. From a larger or smaller quantity of customers is discrimination. By not allowing
5. Some customers to provide a usage reading is also discrimination. As a public
6. Utility that has a monopoly the company must be required to provide service
7. Equally to all customers across all classes of services, rates and any other
8. Categories with no exceptions. This company must be required by the PUC
9. To prioritize a solution to the 8649 flat rate customers with the ability to
10. transmit a usage reading to the company to be billed as accurately as possible
11. For all 13 rate zones. There are meters that transmit to a satellite if a customer
12. Owns one the company must be required to accept the usage reading.

### **III. CONCLUSION**

13. Q. Does that conclude your testimony at this time?
14. A. Yes, it does, but I reserve the right to supplement my testimony as needed
15. During these proceedings.





**Via Email**

January 23, 2023

Honorable Darlene Heep  
Administrative law Judge  
Office of Administrative Law Judge  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
[dheep@pa.gov](mailto:dheep@pa.gov)  
[sdelvillar@pa.gov](mailto:sdelvillar@pa.gov)

RE: ***PA PUC v. Aqua Pennsylvania Wastewater, Inc.***  
***PUC Docket No. R-2022-3036634***

***Richard Adams v. Aqua Pennsylvania Wastewater, Inc.***  
***PUC Docket No. C-2022-3037266***

Dear Judge Long:

Attached please find the Direct Testimony submitted on behalf of Aqua Pennsylvania Wastewater, Inc. in the above-referenced proceeding:

Aqua Statement No. 1      Direct Testimony of Erin Feeney

Sincerely,

*Mary McFall Hopper*

Mary McFall Hopper  
Regulatory Counsel  
[mmhopper@aquaamerica.com](mailto:mmhopper@aquaamerica.com)  
(610) 645-1170

Enclosure

cc: Rosemary Chiavetta, Secretary (Letter and Certificate of Service only)  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PA PUC v. AQUA PENNSYLVANIA WATERWATER, INC.	:	
	:	DOCKET NO: R-2022-3036634
	:	
	:	
v.	:	
	:	
RICHARD ADAMS v. AQUA PENNSYLVANIA WASTEWATER, INC.	:	
	:	DOCKET NO: C-2022-3037266
	:	

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document, Aqua Pennsylvania Wastewater, Inc’s. Aqua Statement No. 1 – Direct Testimony of Erin Feeney, upon the persons and in the manner set forth below:

Via Email:

Richard Adams  
221 Taylorsville Road  
Yardley, PA 19067  
[urbroa@hotmail.com](mailto:urbroa@hotmail.com)

*Mary McFall Hopper*

---

Mary McFall Hopper, Esquire  
Counsel for  
Aqua Pennsylvania Wastewater, Inc.  
762 W. Lancaster Avenue  
Bryn Mawr, PA 19010  
(610) 645-1170  
[mmhopper@aquaamerica.com](mailto:mmhopper@aquaamerica.com)

Dated: January 23, 2023

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PA PUC v. AQUA PENNSYLVANIA	:	
WATERWATER, INC.	:	DOCKET NO: R-2022-3036634
	:	
&	:	
RICHARD ADAMS v.	:	
AQUA PENNSYLVANIA	:	DOCKET NO: C-2022-3037266
WASTEWATER, INC.	:	

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**DIRECT TESTIMONY OF  
ERIN M. FEENEY**

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DATE SERVED: January 23, 2023  
DATE ADMITTED: \_\_\_\_\_

**Aqua Statement No. 1**

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1                                   **I.           INTRODUCTION AND PURPOSE OF TESTIMONY**

2   **Q.    What is your name and business address?**

3   A.    My name is Erin M. Feeney. My business address is 762 W. Lancaster Avenue, Bryn  
4       Mawr, Pennsylvania 19010.

5   **Q.    By whom are you employed and in what capacity?**

6   A.    I am employed by Aqua Pennsylvania, Inc. as Manager of Rates.

7   **Q.    On whose behalf are you providing this direct testimony?**

8   A.    I am providing this testimony on behalf of Aqua Pennsylvania Wastewater, Inc. (“Aqua”,  
9       “AP”, or the “Company”).

10  **Q.    Please describe your education and business experience.**

11  A.    I graduated from La Salle University in 2012 with a Bachelor of Science degree in Business  
12       Administration, with a major in Accounting. I have also completed the Utility Rate School  
13       course sponsored by the National Association of Regulatory Utility Commissioners.

14           I have been employed by Aqua PA or Aqua Services, Inc. (“Aqua Services”) since  
15       2009. Throughout my university education, I worked at Aqua Services part-time in a  
16       variety of departments, including Finance Projects, Tax, and Financial Planning and  
17       Analysis. Upon graduation, I was hired as a full-time Financial Analyst in the Financial  
18       Planning and Analysis (“FP&A”) department, and in 2014 I was promoted to a Financial  
19       & Systems Analyst. My duties in the FP&A department included developing, preparing  
20       and maintaining financial reports, variance analysis and other financial models while  
21       closely supporting the budgeting and long-term planning needs of Aqua America’s  
22       subsidiaries. In 2016, I transferred to Aqua PA where I worked in the Rates and Planning  
23       Department. I was promoted in 2019 to my current position as Manager of Rates.

1 **Q. What are your duties as Manager of Rates?**

2 A. My duties primarily include the preparation of various financial regulatory filings  
3 submitted with the Pennsylvania Public Utility Commission (“PUC” or the  
4 “Commission”). Those filings include, but are not limited to, the following: Quarterly  
5 Earnings Reports, Distribution System Improvement Charge (“DSIC”) Surcharge filings,  
6 water and wastewater tariff compliance filings, and other regulatory compliance filings  
7 upon request of the PUC. My duties also include the preparation of base rate cases and  
8 supporting those applications as a primary accounting witness. I report directly to the  
9 Controller of Aqua PA, with whom I assist in the oversight and direction of regulatory  
10 accounting matters for the Company.

11 **Q. What is the purpose of your testimony?**

12 A. The purpose of my testimony is to describe the Company’s Supplement No. 2 to Tariff  
13 Sewer-PA P.U.C. No. 3 (“Proposed Tariff Supplement”).

14 **II. PROPOSED TARIFF SUPPLEMENT**

15 **Q. Please describe the Company’s Proposed Tariff Supplement.**

16 A. On November 8, 2022, the Company filed the Proposed Tariff Supplement to address an  
17 issue arising out of recent acquisitions by Aqua for Limerick Township, East Norriton  
18 Township and Lower Makefield Township (“Townships”). The Commission issued orders  
19 approving Aqua’s application to acquire the wastewater assets of the above systems on  
20 July 12, 2018 (Limerick Township), May 21, 2020 (East Norriton Township) and January  
21 13, 2022 (Lower Makefield Township). Prior to the acquisition by Aqua, the Townships  
22 offered a deduct metering program for residents. The Proposed Tariff Supplement would  
23 permit customers who previously owned and installed a secondary water meter (“deduct

1 meter”) to receive a sewer billing deduction for the measured water consumption that is  
2 used but does not enter the Company’s wastewater system as previously provided for by  
3 the Townships.

4 **Q. What type of deduct metering programs did the Townships have?**

5 A. The Townships had a program where customers, at their own expense, would install a  
6 secondary meter on their water line that measured water usage for a pool or irrigation. The  
7 customers were required to provide readings to the Townships during a designated time  
8 period, usually the spring and summer months, and the Townships would apply a sewer  
9 billing deduction for the water measured by the secondary meter and which did not enter  
10 the Townships wastewater system.

11 **Q. Why did the Company file the Proposed Tariff Supplement?**

12 A. The Company filed the Proposed Tariff Supplement because customers acquired from the  
13 Townships had previously installed deduct meters, at their own expense, and their bills  
14 reflected a deduction on their sewer bills prior to their acquisition by the Company and the  
15 Company, upon request from the affected customers and townships, is proposing to  
16 incorporate this practice in its tariff.

17 **Q. Why is this Proposed Tariff Supplement limited in scope to the three particular rate  
18 zones?**

19 A. The Proposed Tariff Supplement is limited in scope to customers in the three particular rate  
20 zones who, prior to the acquisition by Aqua, had purchased a secondary meter in  
21 compliance with the Townships’ program and who wish to continue to have a deduction  
22 from their bill for the usage from their secondary meter. By limiting the eligible customers  
23 to those that already purchased a secondary meter at their own expense, the Company is

1 will not incur any additional expenses to install secondary water meters on customer-  
2 owned water lines, particularly in areas where Aqua is not the water provider.

3 **Q. How does the fact that the Townships had existing deduct programs impact the**  
4 **Company's Proposed Tariff?**

5 A In recent filings under Section 1329 the Commission has required the Company to adopt  
6 existing deducts programs of the acquired municipality. This Proposed Tariff would  
7 allow the Company to implement a deduct program for customers who have a secondary  
8 meter, that was recognized by the municipality at the time of closing, for all  
9 municipalities who had such programs prior to the acquisition by the Company under  
10 Section 1329.

11 **Q. Who installed the deduct meter, and what are the requirements?**

12 A. The customer to purchased, installed, and maintains the approved deduct meter at the  
13 approved and inspected water outlet on their property. The meter shall measure water not  
14 entering the system and shall be eligible for deduction of that used water monthly.  
15 Customers are responsible for the installation and removal of their meters at the approved  
16 service locations each year to prevent freezing and damage. Deduct meters shall be  
17 inspected by the Company yearly at which time the customer agrees to allow the Company  
18 the right to enter upon their property for inspection.

19 **Q. How are the deducted volumes calculated?**

20 A. Customers will be required to manually read the meter and submit the reading from their  
21 deduct meter. The Company will then credit the customer's total gallons consumed by the  
22 gallons recorded from the customer's deduct meter.

23 **Q. How will the Proposed Tariff Supplement impact the Company?**

1 A. The Company anticipates there will be a reduction in revenue of \$97,853 as a result of the  
2 deducted volume and a miscellaneous revenue increase of \$41,6000 collected through an  
3 Administrative Fee for a net decrease in its annual income of \$56,253. The Administrative  
4 Fee is to cover the expenses associated with administering the program, which includes an  
5 annual inspection of the customer owned meter. Any related future rate design impacts on  
6 the Company's customers will be considered in the Company's next base rate case filing.

7 **III. CONCLUSION**

8 **Q. Does that conclude your testimony at this time?**

9 A. Yes, it does, but I reserve the right to supplement my testimony as needed during this  
10 proceeding.



**Via Email**

February 20, 2023

Honorable Darlene Heep  
Administrative law Judge  
Office of Administrative Law Judge  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
[dheep@pa.gov](mailto:dheep@pa.gov)  
[sdelvillar@pa.gov](mailto:sdelvillar@pa.gov)

RE: ***PA PUC v. Aqua Pennsylvania Wastewater, Inc.***  
***PUC Docket No. R-2022-3036634***

***Richard Adams v. Aqua Pennsylvania Wastewater, Inc.***  
***PUC Docket No. C-2022-3037266***

Dear Judge Heep:

Attached please find the Direct Testimony submitted on behalf of Aqua Pennsylvania Wastewater, Inc. in the above-referenced proceeding:

Aqua Statement No. 1-R      Rebuttal Testimony of Erin Feeney

Sincerely,

A handwritten signature in blue ink, appearing to read "Mary McFall Hopper".

Mary McFall Hopper  
Regulatory Counsel  
[mmhopper@aquaamerica.com](mailto:mmhopper@aquaamerica.com)  
(610) 645-1170

Enclosure

cc: Rosemary Chiavetta, Secretary (Letter and Certificate of Service only)  
Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PA PUC v. AQUA PENNSYLVANIA	:	
WATERWATER, INC.	:	DOCKET NO: R-2022-3036634
	:	
&	:	
RICHARD ADAMS v.	:	DOCKET NO. C-2022-3037266
AQUA PENNSYLVANIA	:	
WASTEWATER, INC.	:	

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**REBUTTAL TESTIMONY OF  
ERIN M. FEENEY**

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DATE SERVED: February 20, 2023  
DATE ADMITTED: \_\_\_\_\_

**Aqua Statement No. 1-R**

1 **REBUTTAL TESTIMONY OF ERIN M. FEENEY**

2 **Q. What is your name and business address?**

3 A. My name is Erin M. Feeney. My business address is 762 W. Lancaster Avenue, Bryn  
4 Mawr, Pennsylvania 19010.

5 **Q. Did you previously submit testimony in this proceeding on behalf of Aqua**  
6 **Pennsylvania Wastewater, Inc. (“Aqua”)?**

7 A. Yes. I submitted my direct testimony, Aqua Statement No. 1, on February January 23,  
8 2023.

9 **Q. What is the purpose of your rebuttal testimony?**

10 A. My testimony responds to the Direct Testimony of Richard Adams, the Direct Testimony  
11 of Lower Makefield Witness Majewski and Lower Makefield Witness Greg Hucklebridge.

12 **Q. Complainant Adams is requesting that Aqua notify all customers in Rate Zones 7,**  
13 **10 and 12 of the Proposed Tariff Supplement. What is the Company’s response?**

14 A. The Company’s Proposed Tariff Supplement is a voluntary change in rates and the notice  
15 requirements for this type of filing do not require a general notice to be issued. Section  
16 1308(a) of the Public Utility Code states that the utility shall notify the Commission and  
17 “give such notice of the proposed changes to other interested persons as the commission in  
18 its discretion may direct”. The Commission’s regulations further clarify this requiring that  
19 the utility “shall service a copy of the rate change and supporting data required by this  
20 chapter upon the Office of Consumer Advocate” 52 Pa. Code §53.51(d).

21 **Q. Did Aqua serve the Office of Consumer Advocate with the Proposed Tariff**  
22 **Supplement and supporting data?**

23 A. Yes.

1     **Q.     If the Proposed Tariff Supplement is approved, will the Company notify those**  
2           **affected customers?**

3     A.     Yes.  If the Proposed Tariff Supplement is approved, the Company will notify the  
4           customers who participated in the individual township’s secondary metering program to  
5           inform them that the Company will provide usage credits as the Townships had in the past.  
6           It is important to note that the Proposed Tariff Supplement is not something that will affect  
7           all Aqua customers.  As I have stated before, adopting the program for customers who  
8           previously purchased a deduct meter prior to the acquisition from Aqua will not have any  
9           impact on customer rates and the Company is proposed an administrative fee for those  
10          eligible customers who choose to continue receiving a credit.

11    **Q.     Do you have examples of previous tariff filings where notice was not required to be**  
12          **mailed to all Aqua customers?**

13    A.     Yes I do.  Lead Service Supplement 12 to Pa PUC No. 2 and the addition of a 12” meter  
14          rate Supplement No. 4 to Pa PUC No. 2.

15    **Q.     Are all customers in Rate Zones 7, 10 and 12 eligible for the deduct metering in the**  
16          **Proposed Tariff Supplement.**

17    A.     No.  As explained in our filing (See EMF 1-R Exhibit 1) and my Direct Testimony this  
18          proceeding the Proposed Tariff Supplement is for customers from these particular rate  
19          zones who had previously installed deduct meters, at their own expense, and their bills  
20          reflected a deduction on their sewer bills prior to their acquisition by the Company and the  
21          Company, upon request from the affected customers and townships, is proposing to  
22          incorporate this practice in this tariff.

1     **Q.     Complainant Adams alleges that the Company’s Proposed Tariff Supplement is**  
2           **discriminating by rate and by service. What is the Company’s response?**

3     A.     The Proposed Tariff Supplement is not discriminatory or prohibited by the Public Utility  
4           Code. The Public Utility Code does not require every rate zone or group to be exactly the  
5           same. It is not discriminatory as long as there is justifiable reason for the basis for the  
6           difference. In this particular instance, the rate zones are separate in a reasonable manner  
7           by nature of the acquisitions of the municipalities and the rates in place at the time they  
8           were acquired. The Company is incorporating an existing practice from three wastewater  
9           systems it has acquired. By limiting the eligible customers to those that already purchased  
10          a secondary meter at their own expense, the Company will not incur any additional  
11          expenses to install secondary water meters on customer-owned water lines, particularly in  
12          areas where Aqua is not the water provider. In addition, the inclusion of the secondary  
13          meters from these acquired systems is consistent with recent filings under Section 1329  
14          where the Commission has required the Company to adopt existing deduct programs of the  
15          acquired municipality. The Proposed Tariff Supplement is not a discrimination in service  
16          because the Company is providing equal service to all residents, however, it is not  
17          providing any new deduct meters as they are customer owned. These factors justify the  
18          difference for eligible customers in these specific rate zones.

19     **Q.     Has the Company received requests from customers in these Rate Zones that it**  
20           **permit the use of the deduct meters these customers have already installed?**

21     A:     Yes. As provided in response to data requests in this proceeding the Company has received  
22           both formal and informal complaints. (See EMF 1-R Exhibit 2) In fact, in the last few  
23           weeks we have been served with 3 new formal complaints (PUC Dockets C-2-23-3038261,

1 C-2023-3038173 and C-2022-3036470) from Lower Makefield customers requesting that  
2 the PUC order Aqua to honor the use of these meters.

3 **Q: The Complainant is requesting that the Company be required to offer this to all**  
4 **customers. How does the Company respond?**

5 A. This filing is limited in scope to customers in the three particular rate zones who, prior to  
6 the acquisition by Aqua, had purchased a secondary meter at their own expense in  
7 compliance with the Townships' program and who wish to continue to have a deduction  
8 from their bill for the usage from their secondary meter. Any considerations to expand the  
9 program beyond this limited group of customers would be more appropriately addressed  
10 in a utility base rate case proceeding where the Company could address any impacts to rate  
11 base, revenue and expenses in order to facilitate a possible expansion of the program in  
12 these three rate zones and/or a full-scale deduct metering program.

13 **Q. Complainant Adams is requesting that the Company be required to develop a**  
14 **solution for flat rate customers to transmit a usage reading. How does the Company**  
15 **respond.**

16 A. First the Company submits that the inclusion of flat rate customers into this proceeding is  
17 not appropriate. This Proposed Tariff Supplement is for a limited purpose regarding the  
18 customer-owned secondary meters for sewer deductions. Aqua is not the water provider  
19 for the customers and any request to expand metering of water usage for flat rate sewer  
20 customers is beyond the scope of this proceeding.

21 **Q. Has the Commission recently ruled on unmetered wastewater rates for Aqua?**

22 A. In the Company's last base rate case at Docket Nos. R-2021-3027385 and R-2021-  
23 3027386, the Commission rejected the OCA's proposal to install company-owned meters

1 on customer private wells. A copy of the relevant portion of the Commission's May 16,  
2 2022 Order in Dockets No. R-2023027385 and R-2021-3027836 is attached as Exhibit  
3 EMF 1-R Exhibit 3. Additionally, the Commission acknowledged the standard industry  
4 practice of basing the flat rate on a system-wide average usage per month plus a customer  
5 charge in situations where metered water information is unavailable.

6 **Q. Lower Makefield Townships witnesses Hucklebridge and Majewski are supportive**  
7 **of the Proposed Tariff Supplement. How does the Company respond to their**  
8 **testimony?**

9 A. The Company welcomes the support of Lower Makefield Township to allow Aqua to  
10 recognize the previously installed deduct meters purchased by their residents prior to the  
11 acquisition by Aqua. The Company, however, notes that the Lower Makefield Township  
12 witnesses request that the Proposed Tariff Supplement apply to future residential secondary  
13 water meter customers. As I have explained above, the Proposed Tariff Supplement is  
14 applicable only to customers who had purchased a secondary/deduct water meter prior to  
15 being acquired by the Company. Any future expansion of the use of deduct meters is more  
16 appropriately considered in the context of a general base rate case.

17 **Q. Does that conclude your testimony at this time?**

18 A. Yes, it does, but I reserve the right to supplement my testimony as needed during this  
19 proceeding.

PA PUC v. AQUA PENNSYLVANIA  
WATERWATER, INC.

v.

RICHARD ADAMS v.  
AQUA PENNSYLVANIA  
WASTEWATER, INC.

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DOCKET NO: R-2022-3036634

DOCKET NO: C-2022-3037266

**EMF 1-R Exhibit 1**



**Via Electronic Filing**

November 8, 2022

Secretary Rosemary Chiavetta  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
PO Box 3265  
Harrisburg, PA 17105-3265

Re: Aqua Pennsylvania Wastewater, Inc. Supplement No. 2 to Tariff Sewer-PA P.U.C. No. 3,  
Docket No. R-2022-\_\_\_\_\_

Dear Secretary Chiavetta,

Enclosed via electronic filing please find the replacement pages of Aqua Pennsylvania Wastewater, Inc. Supplement 2 to Sewer – P.A.P.U.C. (“Supplement No. 2) with changes that reflect Aqua Pennsylvania Wastewater, Inc.’s (“Aqua” or the “Company”) revised language concerning the use of secondary water meters for acquired customers in Rate Zone 7, Rate Zone 10, and Rate Zone 12. Supplement 2 contains an issue date of November 8, 2022, and an effective date of January 7, 2023. These changes included in this filing will replace tariff pages 1, 2, 3, and 4 and also adds new tariff pages 10.7.1, 10.10.1, and 10.12.4.

Also, please find the following information submitted as supporting data in accordance with 52 Pa. Code §53.52(a):

1. The specific reasons for each change.

Rate Zone 7 – On July 12, 2018, the Pennsylvania Public Utility Commission (“Commission”) issued an order approving Aqua’s application to acquire the wastewater system assets of Limerick Township (Docket No. A-2017-2605434). There are a number of customers who have previously installed a deduct meter to measure water which is used but does not enter the Company’s wastewater system. This billing deduction was not a part of the application order and this change is to permit customers who have a deduct meter to receive the deduction previously provided for by Limerick.

Rate Zone 10 – On May 21, 2020, the Pennsylvania Public Utility Commission (“Commission”) issued an order approving Aqua’s application to acquire the wastewater system assets of East Norriton Township (Docket No. A-2019-3009052). There are a number of customers who have previously installed a deduct meter to measure water which is used but does not enter the Company’s wastewater system. This billing deduction was not a part of the application order and this change is to permit customers who have a deduct meter to receive the deduction previously provided for by East Norriton.

Rate Zone 12 – On January 13, 2022, the Commission issued an order approving Aqua’s application to acquire the wastewater assets of Lower Makefield Township (Docket No. A-2021-3024267). There are a number of customers who have previously installed a deduct meter to measure water which is used but does not enter the Company’s wastewater system. This billing deduction was not a part of the application order and this change is to permit customers who have a deduct meter to receive the deduction previously provided for by Lower Makefield Township.

2. The total number of customers served by the utility.

The Company serves 61,323 wastewater customers.

3. A calculation of the number of customers, by tariff subdivision, whose bill will be affected by the change:

Limerick (Rate Zone 7) - approximately 188 customers

East Norriton (Rate Zone 10) – approximately 87 customers

Lower Makefield Township (Rate Zone 12) approximately 557 customers

4. The effect of the change on the utility’s customers.

Customers that are eligible will not be required to pay for drinking water use that is not conveyed or treated by the Company in its wastewater system. Any related future rate design impacts on the Company’s customers will be considered in the Company’s next base rate case filing.

5. The direct or indirect effect of the proposed change on the utility’s revenue and expenses.

The Company anticipates that there will be a reduction in revenue of \$97,853 as a result of the deducted volume. The total overall change in volume is a decrease of 181,830 hundred gallons. Miscellaneous revenue is anticipated to increase by \$41,600 collected through an Administration Fee, which is offset by an increase in expenses for annual meter inspections. Administrative billing and customer operations expenses associated with manual reads and billing is not measurable at this time.

6. The effect of the change on the service rendered by the utility.

The Company anticipates that these changes will have no effect on the service rendered by the utility.

7. All factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each.

The Company considered the following factors in its determination to make the proposed change in the tariff, they are as follows:

- (a) The customers acquired from Limerick, East Norriton, and Lower Makefield had previously installed deduct meters and their bills reflected a deduction of their sewer bills prior to their acquisition by the Company and the Company, upon request from the affected customers and townships, is incorporating this practice in its tariff.

8. Studies undertaken by the utility in order to specifically address the proposed changes.

The Company did not undertake a study to specifically address the proposed changes.

9. Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.

While the Company has not taken a formal poll with respect to customer acceptance and desire for the proposed change, the Company has been contacted by some of the affected customers requesting that the Company recognize their deduct meter readings.

10. Plans the utility has for introducing or implementing the changes with respect to its ratepayers.

The changes to the tariff will be implemented following the review period of this tariff supplement.

11. FCC, FERC, or Commission orders or rulings applicable to the filing.

The Company is unaware of any orders or ruling applicable to this filing.

Also, please find the following information submitted as supporting data in accordance with 52 Pa. Code §53.52(b):

1. The specific reasons for each increase or decrease.

Rosemary Chiavetta, Secretary

Re: Aqua Pennsylvania Wastewater, Inc. Supplement No. 2 to Tariff Sewer-PA P.U.C. No. 3  
Docket No. R-2022-\_\_\_\_\_

Please refer to the Company's response to 53.52(a).

2. The operating income statement of the utility for a 12-month period, the end of which may not be more than 120 days prior to the filing. Water and wastewater utilities with annual revenues under \$100,000 and municipal corporations subject to Commission jurisdiction may provide operating income statements for a 12-month period, the end of which may not be more than 180 days prior to the filing.

Please refer to Attachment 1 for the twelve-month period ended September 30, 2022.

3. A calculation of the number of customers, by tariff subdivision, whose bills will be increased.

None.

4. A calculation of the total increases, in dollars, by tariff subdivision, projected to an annual basis.

None.

5. A calculation of the number of customers, by tariff subdivision, whose bills will be decreased.

Please refer to the Company's response to 53.52(a)(3).

6. A calculation of the total decreases, in dollars, by tariff subdivision, projected to an annual basis.

The total annual decrease is estimated to be \$97,253 from the following systems:  
Limerick \$28,618 decrease, East Norriton \$8,742 decrease, Lower Makefield \$60,494.

If you have any questions regarding this filing, please contact me at (610) 520-6359.

Sincerely,



Erin M. Feeney  
Manager of Rates  
Aqua Pennsylvania, Inc.

AQUA PENNSYLVANIA WASTEWATER, INC.  
(hereinafter referred to as the "Company")

RATES, RULES, AND REGULATIONS

GOVERNING THE COLLECTIONS OF

WASTEWATER

IN PORTIONS OF

ADAMS, BERKS, BUCKS, CARBON, CHESTER, CLARION, CLEARFIELD, DELAWARE,  
LACKAWANNA, LUZERNE, MONROE, MONTGOMERY, PIKE, SCHUYLKILL, VENANGO,  
AND WYOMING COUNTIES

IN THE COMMONWEALTH OF PENNSYLVANIA

ISSUED: November 8, 2022

EFFECTIVE: January 7, 2023

By:

Marc Lucca, President  
Aqua Pennsylvania, Inc.  
762 Lancaster Avenue  
Bryn Mawr, Pennsylvania 19010

## **NOTICE**

THIS TARIFF PERMITS CUSTOMERS WHO HAVE A DEDUCT METER TO  
RECEIVE A DEDUCTION FOR CONSUMPTION THAT DOES NOT ENTER THE  
SYSTEM.

LIST OF CHANGES MADE BY THIS TARIFF

Changes: This tariff makes changes to permit customers who have a deduct meter to receive a deduction for consumption that does not enter the system in the acquired systems of Limerick, East Norriton, and Lower Makefield Townships. (See pages 10.7.1, 10.10.1, and 10.12.4)

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Description of Territory Served (Cont'd)	7	Original Page
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**RATE ZONE 7 - CONTINUED****Sewer Charge Adjustment**

The Company is authorized to allow deductions on sewer bills for water which is used but does not enter the Company's system from April through October. A request for deduction shall be subject to the following regulations:

- A. To be an eligible Customer for this credit, the Customer shall have applied for or shall have been currently using the credit as of the execution date of November 16, 2016, of the Asset Purchase Agreement between the Company and Limerick Township.
- B. No deduction shall be granted for customers who do not have a metered water supply
- C. No deduction shall be granted for customers who are delinquent in their payment for service.
- D. One hundred percent of any used water for which a deduction is requested must have been prevented from entering the system.
- E. It is the responsibility of the customer to purchase, install, and maintain the Company approved deduct meter at the approved and inspected water outlet on their property. The meter shall measure water not entering the system and shall be eligible for deduction of that used water monthly.
- F. Customers are responsible for the installation and removal of their meters at the approved service locations each year to prevent freezing and damage. Deduct meters shall be inspected by the Company at the time of installation at which time the customer agrees to allow the Company the right to enter upon their property for inspection. Every deduct meter shall be required to be inspected annually by the Company in order for the customer to be eligible for sewer adjustment charges. The administrative fee charged by the Company to the customer is \$50.00.
- G. All deduct meters shall be of a design approved by the Company, shall be registered with the Company prior to use, and shall be used only by the customer to whom it is registered and at the service location to which it is assigned in accordance with the Company's records.
- H. Eligible Customers are required to submit, or cause to be submitted, all data required to calculate the credit in a manner approved by the Company within a time period determined by the Company. The Company shall then credit the customer's total gallons consumed by the gallons recorded from the customer's deduct meter.
- I. The Company shall be authorized to inspect meters for accuracy and calibration at any time the meter readings are suspect and/or not considered representative of usage. The customer shall be responsible for obtaining calibration of the meter if the Company determines it is not accurate. Failure to make such change or provide such calibration data will result in disqualification from the program.
- J. All approved meters will be subject to the Company's backflow requirements.

## RATE ZONE 10 - CONTINUED

Sewer Charge Adjustment

The Company is authorized to allow deductions on sewer bills for water which is used but does not enter the Company's system from April through October. A request for deduction shall be subject to the following regulations:

- A. To be an eligible Customer for this credit, the Customer shall have applied for or shall have been currently using the credit as of the execution date of October 29, 2018, of the Asset Purchase Agreement between the Company and East Norriton Township.
- B. No deduction shall be granted for customers who do not have a metered water supply
- C. No deduction shall be granted for customers who are delinquent in their payment for service.
- D. One hundred percent of any used water for which a deduction is requested must have been prevented from entering the system.
- E. It is the responsibility of the customer to purchase, install, and maintain the Company approved deduct meter at the approved and inspected water outlet on their property. The meter shall measure water not entering the system and shall be eligible for deduction of that used water monthly.
- F. Customers are responsible for the installation and removal of their meters at the approved service locations each year to prevent freezing and damage. Deduct meters shall be inspected by the Company at the time of installation at which time the customer agrees to allow the Company the right to enter upon their property for inspection. Every deduct meter shall be required to be inspected annually by the Company in order for the customer to be eligible for sewer adjustment charges. The administrative fee charged by the Company to the customer is \$50.00.
- G. All deduct meters shall be of a design approved by the Company, shall be registered with the Company prior to use, and shall be used only by the customer to whom it is registered and at the service location to which it is assigned in accordance with the Company's records.
- H. Eligible Customers are required to submit, or cause to be submitted, all data required to calculate the credit in a manner approved by the Company within a time period determined by the Company. The Company shall then credit the customer's total gallons consumed by the gallons recorded from the customer's deduct meter.
- I. The Company shall be authorized to inspect meters for accuracy and calibration at any time the meter readings are suspect and/or not considered representative of usage. The customer shall be responsible for obtaining calibration of the meter if the Company determines it is not accurate. Failure to make such change or provide such calibration data will result in disqualification from the program.
- J. All approved meters will be subject to the Company's backflow requirements.

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**RATE ZONE 12 - CONTINUED****Sewer Charge Adjustment**

The Company is authorized to allow deductions on sewer bills for water which is used but does not enter the Company's system from April through October. A request for deduction shall be subject to the following regulations:

- A. To be an eligible Customer for this credit, the Customer shall have applied for or shall have been currently using the credit as of the execution date of September 17, 2020, of the Asset Purchase Agreement between the Company and Lower Makefield Township.
- B. No deduction shall be granted for customers who do not have a metered water supply
- C. No deduction shall be granted for customers who are delinquent in their payment for service.
- D. One hundred percent of any used water for which a deduction is requested must have been prevented from entering the system.
- E. It is the responsibility of the customer to purchase, install, and maintain the Company approved deduct meter at the approved and inspected water outlet on their property. The meter shall measure water not entering the system and shall be eligible for deduction of that used water monthly.
- F. Customers are responsible for the installation and removal of their meters at the approved service locations each year to prevent freezing and damage. Deduct meters shall be inspected by the Company at the time of installation at which time the customer agrees to allow the Company the right to enter upon their property for inspection. Every deduct meter shall be required to be inspected annually by the Company in order for the customer to be eligible for sewer adjustment charges. The administrative fee charged by the Company to the customer is \$50.00.
- G. All deduct meters shall be of a design approved by the Company, shall be registered with the Company prior to use, and shall be used only by the customer to whom it is registered and at the service location to which it is assigned in accordance with the Company's records.
- H. Eligible Customers are required to submit, or cause to be submitted, all data required to calculate the credit in a manner approved by the Company within a time period determined by the Company. The Company shall then credit the customer's total gallons consumed by the gallons recorded from the customer's deduct meter.
- I. The Company shall be authorized to inspect meters for accuracy and calibration at any time the meter readings are suspect and/or not considered representative of usage. The customer shall be responsible for obtaining calibration of the meter if the Company determines it is not accurate. Failure to make such change or provide such calibration data will result in disqualification from the program.
- J. All approved meters will be subject to the Company's backflow requirements.

**AQUA PENNSYLVANIA WASTEWATER, INC.**  
**CERTIFICATE OF SERVICE**

**BEFORE THE**  
**PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Aqua Pennsylvania Wastewater, Inc.

Aqua Pennsylvania, Inc.  
Supplement No. 2 to Tariff  
Sewer-PA P.U.C. No. 3,

**CERTIFICATE OF SERVICE**

I hereby certify that I have on November 8, 2022 served a true and correct copy of the document Aqua Pennsylvania Wastewater, Inc.'s Supplement No. 2 to Tariff Sewer-PA P.U.C. No. 3, Replacement of pages 1, 2, 3, 4, 10.7.1, 10.10.1, and 10.12.4 upon the individuals and in the manner listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant):

**VIA eFILING & EMAIL**

Patrick Cicerio  
Christine Hoover  
Office of Consumer Advocate  
555 Walnut Street,  
Fifth Floor, Forum Place  
Harrisburg, PA 17101-1923  
(email to: [PCicero@paoca.org](mailto:PCicero@paoca.org) &  
[choover@paoca.org](mailto:choover@paoca.org))

Steven Grey  
Office of Small Business Advocate  
555 Walnut Street.  
Forum Place, 1<sup>st</sup> Floor  
Harrisburg, PA 17101  
(email to: [sgray@pa.gov](mailto:sgray@pa.gov))

Paul Diskin  
Marissa Boyle  
Bureau of Technical Utility Services  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(email to: [pdiskin@pa.gov](mailto:pdiskin@pa.gov) & [mboyle@pa.gov](mailto:mboyle@pa.gov))

Richard Kanaskie  
Joseph Kubas  
Bureau of Investigation and Enforcement  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120  
(email to: [rkanaskie@pa.gov](mailto:rkanaskie@pa.gov) &  
[jkubas@pa.gov](mailto:jkubas@pa.gov))

Dated: November 8, 2022

  
Erin M. Feeney  
Manager of Rates  
Aqua Pennsylvania, Inc.

## ATTACHMENT 1

<b>Aqua PA Wastewater, Inc.</b>		
<b>OPERATING INCOME STATEMENT</b>		
<b>For The Twelve Months Ended 9/30/2022</b>		
	Operating Revenue - Sewer	-51,599,707
	Total Operating Revenue	-51,599,707
	Total Non Operating Revenue	-2,046,568
	<b>TOTAL REVENUE</b>	<b>-53,646,275</b>
	Total Labor	3,523,623
	Total Employee Benefits	814,580
	Total Purchased Water	17,143
	Total Purchased Wastewater	10,147,123
	Total Sludge	911,412
	Total Purchased Power	1,408,284
	Chemicals	620,338
	Supplies	284,204
	Capitalized Supplies	-150,621
	Total Materials & Supplies	133,583
	Outside Services - Operations	1,953,787
	Outside Services - Engineering	250,327
	Outside Services - Accounting/Auditing	28,246
	Outside Services - Legal	94,422
	Outside Services - Lab Testing	367,053
	Outside Services - ACO	323,956
	Outside Services - Other	705,197
	Total Outside Services	3,722,988
	Total Management Fees	11,684,802
	Total Leases	133,271
	Total Transportation	205,944
	Total Other Miscellaneous Expenses	461,819
	Total Insurance	-61,486
	Total Bad Debt	148,082
	Total Non Operating Expenses	1,586,328
	Total Operations & Maintenance Expense	35,457,834
	Total Depreciation	12,493,295
	Total Amortization	-1,118,093
	Total Taxes Other Than Income	706,532
	<b>TOTAL UTILITY COSTS &amp; EXPENSES</b>	<b>47,539,569</b>
	<b>TOTAL OPERATING INCOME</b>	<b>-6,106,706</b>
	Interest on LTD	8,404
	Interest on Long Term Debt	8,404
	Allow For Funds Used During Construction	-2,727,696
	Total Interest Expense	-2,719,292
	Gains from Sales of Property	-62,225
	Other Net (Income) Expense	-62,225
	<b>TOTAL OTHER (INCOME) EXPENSE</b>	<b>-2,781,517</b>
	<b>TOTAL INCOME BEFORE TAX &amp; GAIN</b>	<b>-8,888,223</b>
	Federal Taxes - Current	2,413,735
	State Taxes - Current	498,355
	Total Income Taxes - Current	2,912,090
	Federal Taxes - Deferred	-1,005,680
	State Taxes - Deferred	-347,688
	Total Income Taxes - Deferred	-1,353,368
	<b>TOTAL INCOME TAXES</b>	<b>1,558,722</b>
	<b>TOTAL NET INCOME</b>	<b>-7,329,501</b>
	<b>NET INCOME AVAILABLE FOR COMMON</b>	<b>7,329,501</b>
	<b>TOTAL NET INCOME AVAILABLE FOR COMMON</b>	

PA PUC v. AQUA PENNSYLVANIA  
WATERWATER, INC.

v.

RICHARD ADAMS v.  
AQUA PENNSYLVANIA  
WASTEWATER, INC.

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DOCKET NO: R-2022-3036634

DOCKET NO: C-2022-3037266

**EMF 1-R Exhibit 2**

Respondent: Erin M. Feeney

Date: 12/1/2022

**AQUA PENNSYLVANIA, INC.**  
**DOCKET NO. R-2022-3036634**  
**BUREAU OF TECHNICAL UTILITY SERVICES**  
**SET I DATA REQUESTS**

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**TUS-R-4** Please identify any informal complaints, before the Commission, between APW and any of its customers in Limerick, East Norriton, and Lower Makefield Townships regarding the use of deduct meters and provide a description of the resolution of those complaints by municipality.

**RESPONSE**

Please see list below.

<b>Case/Docket Number</b>	<b>Municipality</b>	<b>Resolution</b>
BCS No. 3878104	Lower Makefield	Open w/BCS
BCS No. 3876609	Lower Makefield	Closed - Customer did not contact Co. prior to filing
BCS No. 3875239	Lower Makefield	Open w/BCS
BCS No. 3874196	Lower Makefield	Open w/BCS
BCS No. 3871208	Lower Makefield	Open w/BCS
BCS No. 3870006	Lower Makefield	Verbal close by BCS - Company does not offer deducts
BCS No. 3868726	Lower Makefield	Closed - Company is properly billing per PUC tariff
BCS No. 3868680	Lower Makefield	Verbal close by BCS - Company does not offer deducts but Company is reviewing a filing to permit deducts for Lower Makefield
BCS No. 3868424	Lower Makefield	Open w/BCS
BCS No. 3868028	Lower Makefield	Open w/BCS
BCS No. 3865702	Lower Makefield	Verbal close by BCS - Company does not offer deducts per its tariff. Customer understood
BCS No. 3864554	Lower Makefield	BCS Dismissed - tariff does not allow deducts
BCS No. 3862453	Lower Makefield	BCS Dismissed - tariff does not allow deducts
C-2022-3036470	Lower Makefield	Settled - Company tariff filing resolves case
BCS No. 3861732	Lower Makefield	BCS Verbal close
BCS No. 3843431	Lower Makefield	BCS dismissed.
F-2022-3033903	Lower Makefield	Settled - Company tariff filing resolves case
BCS No. 3835753	Lower Makefield	BCS verbal close - customer satisfied that Company was planning to review filing for approval of deduct
F-2022-3036341	Lower Makefield	Open case
C-2021-3028695	East Norriton	Settled
C-2021-3028399	East Norriton	Settled

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PA PUC v. AQUA PENNSYLVANIA	:	
WATERWATER, INC.	:	DOCKET NO: R-2022-3036634
	:	
v.	:	
	:	
RICHARD ADAMS v.	:	
AQUA PENNSYLVANIA	:	DOCKET NO: C-2022-3037266
WASTEWATER, INC.	:	

**EMF 1-R Exhibit 3**

proposal. Therefore, we find that I&E's proposal reasonably balances the principles of gradualism with the challenges of rate consolidation, especially those that come with newly acquired systems, while preserving adequate opportunity for customer savings due to conservation efforts. As such, we find no basis to reverse the ALJ's recommendation. Accordingly, OCA Exception Nos. 12 and 13 are denied.

**b. Unmetered Residential Wastewater Rates**

Aqua explained that similar to many wastewater systems throughout the Commonwealth, Aqua does serve a limited number of areas where wastewater customers are billed on a flat rate, meaning that unmetered customers receiving wastewater service from Aqua pay the same amount each month, *i.e.*, their water consumption does not have an effect on their monthly wastewater bills. Unmetered, flat-rate wastewater customers make up the communities of Tobyhanna, Pennsylvania (730 customers) and Lake Harmony, Pennsylvania (995 customers).<sup>104</sup> These communities were billed on a flat rate prior to Aqua's acquisition of these wastewater systems, and the Company has continued to bill the customers on a flat-rate basis. Aqua St. 9-R at 28.

There is no question that volumetric billing is preferable to flat-rate billing, as it provides better price signals and promotes conservation, as well as resulting in a more equitable distribution of the variable costs of wastewater service among ratepayers. However, in situations, such as this, where metered water information is unavailable, we acknowledge the standard industry practice of basing the flat rate on a system-wide average usage per month plus a customer charge. As indicated previously, Aqua assumes an average 5/8" meter residential customer uses 4,000 gallons per month.

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<sup>104</sup> Customers in Tobyhanna and Lake Harmony obtain their water supplies from individual wells not owned or operated by a utility or a municipality/municipal authority. Aqua St. 9-R at 28.

The flat charge should be reasonable and appropriate, and sufficient to cover the intended costs. The challenge is the development of a reasonable flat-rate charge. In this regard, we cannot ignore the disparity in the rates charged to metered and unmetered customers in certain divisions where Aqua serves both types of customers, as illustrated by the OCA. For these reasons, we agree with the ALJ's recommendation that directs Aqua to study and report the results in the next base rate proceeding, in order to determine whether different methods of calculating a flat rate would be more reasonable for some systems rather than applying a system-wide average to each system. Accordingly, Aqua Exception No. 10 is denied.

The primary concern at the public input hearings voiced by customers receiving wastewater service in the Tobyhanna and Lake Harmony service areas, including Mr. Osinski, was that flat-rate billing is unfair to customers with below average usage, including customers who may be part-time residents that may use less than full-time residents. *See* Tr. at 70-71, 166-68, 175-81, and 323-25. Recognizing that customers in Lake Harmony have private water wells on their property that are not individually metered, the OCA proposed a pilot program in Lake Harmony to install meters: (1) on an opt-in basis for those customers that request metered wastewater service, (2) on other customer-owned wells based upon a random sample of 10% to 20% of the unmetered customers. *See* OCA St. 4 SUPP. at 2.

Although we find merit in the OCA's proposal that Aqua study whether a different method of calculating a flat rate would be more reasonable for some systems than applying a system-wide average, we cannot say the same for its Lake Harmony pilot program proposal. Instead, we find persuasive the testimony of Aqua's witness, Ms. Heppenstall, explaining the impracticability of the OCA's proposal:

I disagree for two reasons. One, the Company does not have the authority to meter a representative sampling of customer owned private wells. Allowing customers to opt in would

only incentivize those customers with low water consumption, not the perceived larger users. Second, there are concerns about the ability to access customers' property to properly install a meter on a well. I understand that Company Witness Todd Duerr will explain the operational issues with this pilot program in his rebuttal testimony ([Aqua St. 9-R]). There may be substantial cost involved, and Mr. Watkins' proposal is that the Company bear the cost of such installations. Finally, the lack of authority to meter all privately owned wells means that the "pilot" can never be adopted as a permanent solution. Customers would continually opt for the lesser cost alternative. Mr. Watkins' proposal is unworkable.

Aqua St. 5-R at 17-18. We also find it difficult to ignore the operational issues with the OCA's proposal, highlighted by Aqua's witness, Mr. Duerr:

First, we reinforce that industrywide flat sewer rates have been utilized to bill for public or private wastewater service in instances where customers have private wells throughout the Commonwealth. While we understand the customer's desire to limit any rate increase, resorting to changing the current methodology on which these customers are billed will not impact that reality, and in fact, some customers could be billed more. For wastewater only customers that receive water from private wells, the Company would be required to enter, traverse, and locate a customer's water well, to a property the Company does not have a right to enter, install a Company owned meter somewhere on a customer's property where a water well is located, and maintain that property going forward. That in and of itself is problematic.

Aqua St. 9-R at 29-30.

Regarding Mr. Osinski's assertion that the well servicing his community is metered, Mr. Duerr explained that "the well, the water meter, and the water distribution system are owned by the community. There are not individual meters measuring usage to

each customer's residence. As such, the Company cannot bill these individual customers based on usage from one community water meter." Aqua St. 9-R at 30-31.

Based upon our review of the record evidence, we agree with the recommendation of the ALJ that the OCA's proposal be rejected, as it is not clear that the cost of the OCA's proposed pilot will achieve overall benefits to Aqua's customers that will outweigh the costs. The OCA does not explain: (1) Aqua's authority to place a meter on a person's water line; (2) how higher-usage customers could be "incentivized" to opt-in in the future; nor (3) why wastewater cost of service should be increased to cover the cost of installing, maintaining, and reading water meters for wastewater service. As such, we find no basis to reverse the ALJ's recommendation. Accordingly, OCA Exception No. 14 and Mr. Osinski's Exceptions are denied.

With regard to the OCA's argument that the Company be required to study the feasibility of opening an irrigation or deduct metering program to Aqua's non-Cheltenham customers and file the results of the study no later than the Company's next base rate case, we agree with the ALJ that the OCA has not demonstrated that further study would yield better results. Aqua noted that further studies are not necessary because the results will be similar to the analysis presented by the Company in the instant base rate case. Further, Aqua noted that the installation of a meter to measure usage deductions will increase the revenue requirement and not reduce the revenue requirement subject to recovery. Aqua M.B. at 244-45. Moreover, beyond arguing that it is unaware if the Company has conducted any studies on irrigation metering, the OCA has not sufficiently demonstrated why the Company should be required to conduct an irrigation metering study at this time. Accordingly, we find the OCA's argument that the Commission require the Company to conduct an irrigation metering program study to be unpersuasive.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PA PUC v. AQUA PENNSYLVANIA	:	
WATERWATER, INC.	:	DOCKET NO: R-2022-3036634
	:	
v.	:	
	:	
RICHARD ADAMS v.	:	
AQUA PENNSYLVANIA	:	DOCKET NO: C-2022-3037266
WASTEWATER, INC.	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of Aqua Statement No. 1-R

Rebuttal Testimony of Erin Feeney upon the persons and in the manner set forth below:

Via Email:

The Honorable Darlene Heep  
Administrative Law Judge  
Pennsylvania Public Utility Commission  
[dheep@pa.gov](mailto:dheep@pa.gov)  
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Counsel for  
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762 W. Lancaster Avenue  
Bryn Mawr, PA 19010  
(610) 645-1170  
[mmhopper@aquaamerica.com](mailto:mmhopper@aquaamerica.com)

Dated: February 20, 2023

February 6, 2023

***Via E-mail***

Honorable Darlene Heep  
Administrative Law Judge  
Office of Administrative Law Judge  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
*dheep@pa.gov*  
*sdelvillar@pa.gov*

RE: ***PA PUC v. Aqua Pennsylvania Wastewater, Inc.***  
***PUC Docket No. R-2022-3036634***

***Richard Adams v. Aqua Pennsylvania Wastewater, Inc.***  
***PUC Docket No. C-2022-3037266***

Dear Judge Heep:

Attached please find the Direct Testimony submitted on behalf of Intervenor, Lower Makefield Township ("LMT") in the above referenced proceeding:

LMT Statement No. 1                      Direct Testimony of James Majewski

If you have any questions, or require any additional information, please do not hesitate to contact this office. Thank you.

Respectfully Submitted,



David J. Truelove, Esquire  
Attorney for Intervenor, Lower Makefield Township  
dtruelove@hillwallack.com  
(267) 759-2075

DJT/sp

cc: Rosemary Chiavetta, Secretary (Letter and Certificate of Service only)  
Mary McFall Hopper, Esquire, Counsel for Aqua of Pennsylvania Wastewater, Inc.  
Richard Adams, Complainant, *pro se*  
Certificate of Service

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

---

PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: R-2022-3036634  
C-2022-3037266

v.

AQUA PENNSYLVANIA WASTEWATER, INC.

and

RICHARD ADAMS

v.

AQUA PENNSYLVANIA WASTEWATER, INC.

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**LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 1**

**DIRECT TESTIMONY OF  
JAMES MAJEWSKI  
COMMUNITY DEVELOPMENT DIRECTOR  
LOWER MAKEFIELD TOWNSHIP**

**February 2023**

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I. INTRODUCTION .....3

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LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 1  
DIRECT TESTIMONY OF JAMES MAJEWSKI

1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is James Majewski. My business address is 1100 Edgewood Road, Yardley PA  
4 19067.

5  
6 **Q. In what capacity are you affiliated with Lower Makefield Township?**

7 A. I am employed as the Township's Community Development Director. I also serve as its  
8 Zoning Officer, and Floodplain Manager.

9  
10 **Q. Please provide a brief description of your duties as the Township's Community  
11 Development Director, Zoning Officer, and Floodplain Manager.**

12 A. I am responsible for the overall supervision and administration of all phases of community  
13 development, including development of land use policies and regulations, and enforcement  
14 of the Township's Zoning Ordinances and Regulations, Subdivision and Land  
15 Development Ordinances and the Township Building Codes.

16  
17 **Q. Please provide a brief description of your education and work experience.**

18 A. I have a Bachelor of Science Degree in Civil Engineering from the Pennsylvania State  
19 University. I am licensed in Pennsylvania as a Professional Engineer, in NJ as a  
20 Professional Planner, and nationally as a Certified Floodplain Manager. I have worked for  
21 Lower Makefield Township since 2017. Prior to working for the Township, I worked for  
22 several engineering firms and state government in Pennsylvania for 15 years as a

LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 1  
DIRECT TESTIMONY OF JAMES MAJEWSKI

1 professional engineer and planner. I also have worked for a consulting engineering firm in  
2 New Jersey for 16 years providing as a surveyor, engineer, and planner.

3

4 **Q. Have you testified before the Pennsylvania Public Utility Commission (“PUC” or the**  
5 **“Commission” before?**

6 A. No. I have not.

7

8 **Q. On what date was the system formally sold to Aqua?**

9 A. March 4, 2022.

10

11 **Q. On whose behalf are you testifying in this proceeding?**

12 A. Lower Makefield Township.

13

14 **Q. What is the purpose of your direct testimony and summarize key points?**

15 A. I am testifying in support of the Township's position with respect to Aqua Pennsylvania  
16 Wastewater, Inc. in that the Township supports the Proposed Tariff Supplement as  
17 submitted by Aqua, seeks its implementation at the earliest possible time, and supports  
18 approval of deductions, credits, exemptions, or waivers to any past, present and future  
19 residential secondary water meter holders. In summary, my testimony shows that the  
20 Township itself has a secondary meter for the pool complex and a waiver for water charges  
21 to fill the pools at the complex. Additionally, other users in the Township also received  
22 waivers for their secondary meters while the sewer system was owned by the Township in  
23 connection with their pools. Finally, applications for a zoning permit for an above ground

LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 1  
DIRECT TESTIMONY OF JAMES MAJEWSKI

1 or an inground pool are still being filed with the Township indicating a further need for  
2 accommodation for sewer charges for Township property owners and residents.

3

4 **Q. Are you sponsoring any Exhibits with your testimony?**

5 A. No.

6

7 **II. THE MATTER BEFORE THE COMMISSION**

8 **Q. In your work with Lower Makefield, are you familiar with the water and sewer**  
9 **systems serving the Township and its residents?**

10 A. Yes.

11

12 **Q. Are you aware of any accommodations provided to water or sewer users in the**  
13 **Township prior to the sale of the sewer system to Aqua?**

14 A. Yes.

15

16 **Q. What type of accommodations were provided?**

17 A. Waivers were granted to certain users.

18

19 **Q. To your knowledge, why were requests for a waiver made and on what basis were**  
20 **they granted by the Township?**

21 A. Waivers were granted for ratepayers that had water usage that did not flow into the sanitary  
22 sewer system, such as lawn irrigation and swimming pools. That non-contributory water

LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 1  
DIRECT TESTIMONY OF JAMES MAJEWSKI

1 usage was verified through meter readings from a secondary water meter for those  
2 facilities.

3

4 **Q. Does the Township have a secondary meter?**

5 A. Yes.

6

7 **Q. How many secondary meters does the Township have?**

8 A. Two.

9

10 **Q. Please explain why the Township has secondary meters.**

11 A. The Township has a secondary meter to measure water usage at the Township pool  
12 complex and a secondary meter at the Township-owned Makefield Highlands Golf Course.

13

14 **Q. Does the Township itself have a waiver or waivers for its secondary meters?**

15 A. Yes.

16

17 **Q. Please explain why the Township has a waiver or waivers for its secondary meters.**

18 A. The Township did not charge itself for water usage that did not flow into the sanitary sewer  
19 system at the Pool Complex or at the Golf Course.

20

21 **Q. How is a waiver obtained?**

22 A. An applicant, such as the property owner or ratepayer, obtains a building permit for the  
23 secondary meter from the Building Code Official in the Community Development

LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 1  
DIRECT TESTIMONY OF JAMES MAJEWSKI

1 Department, which I oversee, and then takes the permit to the sewer department where they  
2 had to provide certain information each year to get a waiver or discount.

3

4 **Q. How many gallons of water are used to fill the pools at the Township Pool Complex?**

5 A. At the start of each pool season, the Township fills the four pools at the complex with a  
6 total of 725,171 gallons of water.

7

8 **Q. Up to the point of the sale, did you or the Township anticipate additional requests for  
9 a waiver from the sewer rate due to a secondary meter?**

10 A. Yes.

11

12 **Q. In your duties with the Township, do you oversee zoning permit applications?**

13 A. I do.

14

15 **Q. Is a zoning permit required for an inground pool?**

16 A. Yes.

17

18 **Q. Is a zoning permit required for an above ground pool?**

19 A. Yes.

20

21 **Q. For these pools, what were the number of permit applications in 2022?**

22 A. 43.

23

LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 1  
DIRECT TESTIMONY OF JAMES MAJEWSKI

1 **Q. Have you received requests for zoning permits for pools by property owners for the**  
2 **upcoming year?**

3 A. Yes I have.

4

5 **Q. How many?**

6 A. As of February 3, 2023, 4.

7

8 **III. CONCLUSION**

9 **Q. Does this conclude your testimony?**

10 A. Yes, it does; however, I reserve the right to file additional testimony at a later date as may  
11 be necessary or appropriate.

**VERIFICATION**

I, James Majewski, hereby state that the facts set forth in my direct testimony are true and correct (or 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).



Date: 2/3/2023

---

James Majewski  
Community Development Director  
Lower Makefield Township

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: R-2022-3036634  
C-2022-3037266

v.

AQUA PENNSYLVANIA WASTEWATER, INC.

and

RICHARD ADAMS

v.

AQUA PENNSYLVANIA WASTEWATER, INC.

---

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document, Lower Makefield Township's Statement No. 1 – Direct Testimony of James Majewski upon the parties and persons, listed below, in accordance with the requirements of §1.54 via first class mail and electronic mail.

Mary McFall Hopper, Esquire  
766 W. Lancaster Avenue  
Bryn Mawr, PA 19010  
mmhopper@aquaamerica.com  
Counsel for Aqua of Pennsylvania Wastewater, Inc.

Richard Adams  
221 Taylorsville Road  
Yardley, PA 19067  
urbroa@hotmail.com  
Complainant, *pro se*

HILL WALLACK LLP

Date: Feb 4, 2023

By:



David J. Truelove, Esquire  
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Facsimile: 215-579-9248  
dtruelove@hillwallack.com  
*Attorneys for Intervenor  
Township of Lower Makefield*

February 6, 2023

***Via E-mail***

Honorable Darlene Heep  
Administrative law Judge  
Office of Administrative Law Judge  
801 Market Street, Suite 4063  
Philadelphia, PA 19107  
dheep@pa.gov  
sdelvillar@pa.gov

RE: ***PA PUC v. Aqua Pennsylvania Wastewater, Inc.  
PUC Docket No. R-2022-3036634***

***Richard Adams v. Aqua Pennsylvania Wastewater, Inc.  
PUC Docket No. C-2022-3037266***

Dear Judge Heep:

Attached please find the Direct Testimony submitted on behalf of Intervenor, Lower Makefield Township ("LMT") in the above referenced proceeding:

LMT Statement No. 2                  Direct Testimony of Greg Hucklebridge

If you have any questions, or require any additional information, please do not hesitate to contact this office. Thank you.

Respectfully Submitted,



David J. Truelove, Esquire  
Attorney for Intervenor, Lower Makefield Township  
dtruelove@hillwallack.com  
(267) 759-2075

DJT/sp

cc: Rosemary Chiavetta, Secretary (Letter and Certificate of Service only)  
Mary McFall Hopper, Esquire, Counsel for Aqua of Pennsylvania Wastewater, Inc.  
Richard Adams, Complainant, *pro se*  
Certificate of Service

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

---

PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: R-2022-3036634  
C-2022-3037266

v.

AQUA PENNSYLVANIA WASTEWATER, INC.

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AQUA PENNSYLVANIA WASTEWATER, INC.

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**LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 2**

**DIRECT TESTIMONY OF  
GREG HUCKLEBRIDGE  
CONSULTANT FOR  
LOWER MAKEFIELD TOWNSHIP**

**February 2023**

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LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 2  
DIRECT TESTIMONY OF GREG HUCKLEBRIDGE

1   **I.    INTRODUCTION**

2   **Q.    Please state your name and business address.**

3   A.    My name is Greg Hucklebridge. My business address is 55 Township Road, Richboro, PA  
4        18954.

5  
6   **Q.    In what capacity are you affiliated with Lower Makefield Township?**

7   A.    Currently, I am a consultant for the Township with respect to outstanding items related to  
8        the sewer system.

9  
10  **Q.    Please provide a brief description of your education and work experience.**

11  A.    I graduated from Lehigh University in 2003 with a Bachelor of Science in Civil  
12        Engineering. Upon graduating I worked in heavy construction performing estimating and  
13        project management duties for construction of power plants, bridge and tunnel projects. I  
14        also worked as a consultant for land development projects, with a focus on site design,  
15        planning, stormwater management, and permitting.

16  
17        In 2008 I obtained a professional engineer license in Pennsylvania. In 2013, I was hired at  
18        Warminster Township, Bucks County as the Director of Engineering and Operations  
19        primarily managing the Public Works Department. From February 2017 through June  
20        2022, I was employed by Lower Makefield Township as the Township's Public Works  
21        Director where, as part of my duties, I oversaw the day-to-day operations of the Sanitary  
22        Sewer System. I am currently employed as the Public Works Director at Northampton  
23        Township.

LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 2  
DIRECT TESTIMONY OF GREG HUCKLEBRIDGE

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**Q. Have you testified before the Pennsylvania Public Utility Commission (“PUC” or the “Commission” before?**

A. No.

**Q. On what date was the system formally sold to Aqua?**

A. March 4, 2022.

**Q. When did operations transfer from the Township to Aqua?**

A. March 5, 2022.

**Q. What is the purpose of your direct testimony and summarize key points?**

A. I am testifying in support of the Township’s position with respect to Aqua Pennsylvania Wastewater, Inc. in that the Township supports the Proposed Tariff Supplement as submitted by Aqua, seeks its implementation at the earliest possible time, and supports approval of deductions, credits, exemptions, or waivers to any past, present and future residential secondary water meter holders. My testimony explains, during the Township’s ownership of the sewer system, how waivers were obtained and how many waivers were obtained. My testimony also describes the process by which secondary meters were installed and paid for at a property.

**Q. On whose behalf are you testifying in this proceeding?**

A. Lower Makefield Township.

LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 2  
DIRECT TESTIMONY OF GREG HUCKLEBRIDGE

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**Q. Are you sponsoring any Exhibits with your testimony?**

A. No.

**II. THE MATTER BEFORE THE COMMISSION**

**Q. In your work with Lower Makefield, are you familiar with the water and sewer systems serving the Township and its residents?**

A. Yes.

**Q. In your work with the Township, are you familiar with how a property was billed for sewer usage during the Township's ownership of the sewer system?**

A. Yes.

**Q. Please explain how a property was charged for sewer use during the Township's ownership of the system.**

A. Typically, a property pays for sewer usage based on water meter readings from a water utility company (Morrisville Municipal Authority customers or Pennsylvania American Water customers). Lower Makefield Township had agreements to obtain the water meter records in order to perform the sewer billing. If the properties utilize a well for water supply, they pay a flat rate for the sewer since they do not have a water meter.

**Q. Were you aware of accommodation or waiver requests from sewer charges during the Township's ownership of the system?**

LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 2  
DIRECT TESTIMONY OF GREG HUCKLEBRIDGE

1 A. Yes.

2

3 **Q. From your perspective, why would a property owner or sewer ratepayer request a**  
4 **waiver?**

5 A. A property owner may request a waiver so they would not be charged for sewer usage when  
6 the water was not going into the sewer system. Only properties utilizing public sewer and  
7 public water would potentially be interested in a waiver.

8

9 **Q. In your work with Lower Makefield, do you know how many ratepayers/accounts**  
10 **received a waiver from sewer charges prior to the sale of the Sewer System?**

11 A. Approximately 500 accounts received a waiver from sewer charges prior to the sale of the  
12 Sewer System with approximately 300-350 of those accounts actively participating to  
13 receive credits.

14

15 **Q. What is a secondary meter?**

16 A. An approved property connected to the Lower Makefield Sewer System would hook up a  
17 second water meter to a water pipe leading outside of the home where the water would be  
18 used for various functions (irrigation, filling a pool, washing a car...) and not go into the  
19 sewer system. This meter would need to be installed by a licensed plumber with a permit  
20 through the Township's Planning and Zoning Department (now renamed Community  
21 Development Department).

22

23 **Q. How did the waiver work?**

LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 2  
DIRECT TESTIMONY OF GREG HUCKLEBRIDGE

1 A. A property was approved for a waiver, the property owner or ratepayer would then be  
2 responsible to send a picture of the meter reading in on an annual basis. These readings  
3 would then be used to determine the amount of usage which did not go into the public  
4 sewer and this amount would then be discounted on the next sewer bill for that property.  
5 The Township would grant and process these requests.

6

7 **Q. Did the Township pay to install secondary meters?**

8 A. I am not aware of any secondary meters being bought by the Township on behalf of a  
9 private property owner, resident, or ratepayer.

10

11 **Q. Who was responsible to pay for the secondary meter and to obtain a discount on a  
12 property's sewer bill where a waiver was granted?**

13 A. The property owner or ratepayer was responsible for the cost to procure and install the  
14 second meter, obtain the necessary permits, have it installed by a licensed plumber, and  
15 submit the pictures of the readings annually for consideration.

16

17 **Q. Does the Township have secondary meters?**

18 A. Yes.

19

20 **Q. Please explain why the Township has secondary meters.**

21 A. For the Township Pool Complex's four pools and the Township-owned Makefield  
22 Highlands Golf Course for irrigation purposes.

23

LOWER MAKEFIELD TOWNSHIP'S STATEMENT NO. 2  
DIRECT TESTIMONY OF GREG HUCKLEBRIDGE

1 **Q. Does the Township itself have a waiver or waivers for its secondary meters?**

2 A. Yes.

3

4 **III. CONCLUSION**

5 **Q. Does this conclude your testimony?**

6 A. Yes, it does; however, I reserve the right to file additional testimony at a later date as may  
7 be necessary or appropriate.

VERIFICATION

I, Greg Hucklebridge, hereby state that the facts set forth in my direct testimony are true and correct (or 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).

Date: 2/3/2023

  
\_\_\_\_\_  
Greg Hucklebridge

**BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION**

---

PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: R-2022-3036634  
C-2022-3037266

v.

AQUA PENNSYLVANIA WASTEWATER, INC.

and

RICHARD ADAMS

v.

AQUA PENNSYLVANIA WASTEWATER, INC.

---

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing document, Lower Makefield Township's Statement No. 2 – Direct Testimony of Greg Hucklebridge upon the parties and persons, listed below, in accordance with the requirements of §1.54 via first class mail and electronic mail.

Mary McFall Hopper, Esquire  
766 W. Lancaster Avenue  
Bryn Mawr, PA 19010  
mmhopper@aquaamerica.com  
Counsel for Aqua of Pennsylvania Wastewater, Inc.

Richard Adams  
221 Taylorsville Road  
Yardley, PA 19067  
urbroa@hotmail.com  
Complainant, *pro se*

HILL WALLACK LLP

Date: Feb 4, 2023

By:



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Township of Lower Makefield*