



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

IN REPLY PLEASE
REFER TO OUR FILE

April 21, 2023

Docket No. A-2023-3039812
Utility Code 230073

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

RE: Application of Pennsylvania-American Water Company – Wastewater Division for approval to begin to offer, render, furnish or supply wastewater service to the public in an additional portion of Sadsbury Township, Chester County, Pennsylvania at Docket No. A-2023-3039812

Dear Attorney Fure:

On April 11, 2023, Pennsylvania-American Water Company – Wastewater Division (PAWC-WD) filed the above-referenced documents (Application) with the Pennsylvania Public Utility Commission (Commission). For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

Please forward the information to the Secretary of the Commission at the address listed below **within ten (10) business days** from the date of this letter. Make sure to reference the Docket Number listed above when filing your response. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>. All documents requiring notary stamps must have original signatures.

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

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

I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature _____

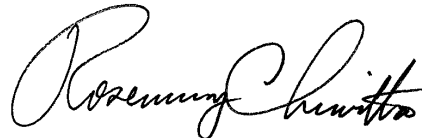
Title _____

Date _____

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

In addition, to expedite completion of the application, please send a copy of your response to Clinton McKinley in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at cmckinley@pa.gov. Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure: TUS Data Request Set 1

cc: Patrick Cicero, Office of Consumer Advocate (w/enclosure), ra-oca@pa.gov
Christine Hoover, Office of Consumer Advocate (w/enclosure), choover@paoca.org
NazAarah Sabree, Office of Small Business Advocate (w/enclosure), ra-sba@pa.gov
Richard Kanaskie, Bureau of Investigation & Enforcement (w/enclosure), rkanaskie@pa.gov

TUS Data Request Set 1

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

- A-1 The Application’s Section 13 indicated that PAWC-WD will be responsible for the costs to install the lateral from the force main to the property line. The Application’s Exhibit B-1, Map of Proposed Service Territory Expansion, depicted a force main (Octorara Force Main) partially aligned with Octorara Trail (State Route 10) and the parcel boundaries of several properties in Sadsbury Township, that appears to terminate at a point of connection with PAWC-WD’s wastewater collection system in Parkesburg. Regarding the referenced Octorara Force Main, please provide responses to following:
- a. Identify the owner of the Octorara Force Main;
 - b. If PAWC-WD does not own the Octorara Force Main, provide evidence of PAWC-WD’s right to connect customers and use the force main for wastewater collection and conveyance (i.e., Asset Purchase or Lease Agreement);
 - c. Quantify the diameter, material type, and installed length of the Octorara Force Main;
 - d. Identify the date the Octorara Force Main was constructed and placed into service, and the original construction cost;
 - e. Revise the Application’s Exhibit B-1 to depict all location(s) the Octorara Force Main connections to PAWC-WD’s existing facilities; and
 - f. Quantify the number of PAWC-WD customers, by customer class, whose wastewater flows are conveyed through the Octorara Force Main.
- A-2 The Application’s Section 14 indicated that PAWC-WD will not be required to obtain any easements to provide wastewater service in the requested service territory as it already has an easement in place that abuts the property. However, the Application’s Exhibit E included a copy of a Utility Easement Agreement between Donald W. Cairns & Kelly M. Cairns and Sadsbury Commons, L.P. (Cairns UEA) and a Utility Easement Agreement between Upper Octorara Presbyterian Church and Sadsbury Commons, L.P. (UOPEA). However, neither of these easement agreements appear to have been conveyed to PAWC-WD. Please provide evidence that the Cairns UEA and UOPEA agreements have been transferred to PAWC-WD or that Sadsbury Commons, L.P., or its successors-in-interest, have granted the necessary easements to PAWC-WD.
- A-3 The Application’s Exhibit E included a copy of only the first page of the UOPEA. Please provide a complete copy of the executed UOPEA.

TUS Data Request Set 1

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- A-4 Please provide a map depicting the location of the Octorara Force Main system in relation to the Application’s requested territory that includes the location of the force main’s pumping station and terminus with topographic elevations identified for both.
- A-5 The Application’s Exhibit I included a copy of the estimated annual revenue and expenses for the requested service territory. The estimated revenue appears to have been calculated using PAWC-WD’s metered charges for Rate Zone 1. However, the Application’s Section 15 indicated that water service within the requested service territory is provided by on-site individual wells. Please revise the Application’s Exhibit I to reflect the estimated revenue for providing service in the requested service territory using PAWC-WD’s Rate Zone 1 unmetered charges for residential service or explain how PAWC-WD intends to meter water consumption in the requested service territory for the purpose of wastewater billing.
- A-6 The Application’s Exhibit K included a copy of a Sanitary Sewer Letter from Sadsbury Township to PAWC-WD that indicated the proposed sewer lateral will be required to have a backflow preventer installed. However, the Application’s Section 11 provided a cost estimate (Cost Estimate) of the facilities required to be installed by PAWC-WD to serve the requested territory which did not appear to include the installation of a backflow preventer. Please provide responses to the following:
- a. Indicate whether PAWC-WD or the property owner is responsible for the installation of a backflow preventer;
 - b. If PAWC-WD is responsible for the backflow preventer, confirm the cost is included the Cost Estimate. If not, provide a revised Cost Estimate that includes the cost to install a backflow preventer; and
 - c. The Cost Estimate’s Footnote 2 indicated that paving costs of approximately \$1,000 were included as part of excavation and backfill. However, based upon the Application’s Exhibit B-1 it appears no pavement is located on the easement. Please provide justification for the pavement cost or provide a revised Cost Estimate that removes the pavement restoration related costs.
- A-7 Please provide a copy of PAWC-WD’s most recent Chapter 94 Municipal Wasteload Management Report for the PAWC-WD Coatesville Wastewater Treatment Plant submitted to the Pennsylvania Department of Environmental Protection.
- A-8 Please explain how approval of PAWC-WD’s Application would benefit PAWC-WD’s existing and proposed customers.