



Erin K. Fure

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VIA eFiling

May 9, 2023

Rosemary Chiavetta, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

**Re: Petition for Approval of Pennsylvania-American Water Company – Wastewater Division
Long-Term Infrastructure Improvement Plan II for the Period January 1, 2024 through
December 31, 2028**

Docket No. P-2023-3038874

Dear Secretary Chiavetta:

Enclosed for filing is Pennsylvania-American Water Company's responses to Data Request Set 1, dated April 18, 2023, from the Bureau of Technical Utility Services.

A copy of the responses is being served upon the parties listed on the enclosed Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Erin K. Fure".

Erin K. Fure

Enclosures

cc: Certificate of Service
K. Shaffer, Bureau of Technical Utility Services, w/Enclosures **VIA** E-Mail

**Pennsylvania-American Water Company – Wastewater Division (PAWC-WD)
Petition for Approval of its Second Long-Term Infrastructure Investment Plan
(Second LTIIIP)**

PAWC Responses to Data Request TUS - 1

Docket No. P-2023-3038874

1. Reference the Petition’s Exhibit No. 1, Section 1 – Types and Age of Eligible Property
- a. Confirm that the Second LTIIIP’s projected quantities to be replaced/improved or projected expenditures are not proportionally higher for systems that were acquired under 66 Pa.C.S. § 1329 and lower for other service areas as compared to PAWC-WD’s currently approved LTIIIP.

Response: The proportion of expenditures for systems acquired under 66 Pa.C.S. § 1329 are not substantively higher than expenditures for other systems on a cost per linear footage of sewer basis.

- b. If PAWC-WD identifies a shift in quantities or expenditures related to question 1.a., above, provide an explanation as to why the shift was appropriate.

Response: There is no substantive shift in expenditures related to question 1.a.

**Responsible Witness: Christopher A. Graf—Engineering Manager, Planning
Pennsylvania-American Water Company**

Date: May 9, 2023

**Pennsylvania-American Water Company – Wastewater Division (PAWC-WD)
Petition for Approval of its Second Long-Term Infrastructure Investment Plan
(Second LTIIIP)**

PAWC Responses to Data Request TUS - 1

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- 2.** Reference the Petition’s Exhibit No. 1, Section 2 – Schedule for Planned Repair and Replacement of Eligible Property
- a. Provide a table similar in content and form to Appendix B¹ of PAWC-WD’s LTIIIP in its Petition for Approval of Modification of its Long-Term Infrastructure Improvement Plan, at Docket No. P-2014-2431005, that includes information for each year of the Second LTIIIP.

Response: Requested Table is attached as DR 2 Attachment 1.

- b. Provide a table identical in content and form to that requested in question 2.a., above, that provides information for the actual replacements and expenditures for each of the years 2019 through 2022, and projected information for 2023.

Response: Requested Table is attached as DR 2 Attachment 2.

**Responsible Witness: Christopher A. Graf—Engineering Manager, Planning
Pennsylvania-American Water Company**

Date: May 9, 2023

¹ Note that the LTIIIP that PAWC-WD included in its Petition for Approval of Modification of its Long-Term Infrastructure Improvement Plan inadvertently omitted Appendix B, which was later provided by PAWC-WD in its February 20, 2020, response to a Commission data request.

**Pennsylvania-American Water Company – Wastewater Division (PAWC-WD)
Petition for Approval of its Second Long-Term Infrastructure Investment Plan
(Second LTIP)**

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3. Reference the Petition’s Exhibit No. 1, Section 4 – Estimate of the Quantity of Property to Be Improved

a. Reference Table 12 on Page 40. Please confirm that the service laterals mentioned in Table 12 are not customer-owned service laterals.

Response: **Service laterals contained in Table 12 are not customer-owned service laterals.**

b. Reference Table 12 on Page 40. Provide a table similar in content and form to Table 12 that provides information for the actual property replaced/rehabilitated for each of the years 2019 through 2022, and projected information for 2023.

Response: **Revised Table 12 is below.**

Table 12 (REV) – Actual and Projected DSIC Eligible Properties Replaced/Rehabilitated or to be Replaced/Rehabilitated

Year	Gravity Pipe (LF)	Manholes (ea)	Service Laterals (ea)	Lift Stations (ea)
2018	19,078	36	267	0
2019	27,299	9	595	0
2020	43,292	392	595	0
2021	68,360	573	655	0
2022	64,650	798	470	1
2023	58,009	722	1646	4
2024	83,375	278	834	1
2025	66,890	223	669	2
2026	76,668	256	767	4
2027	74,800	250	748	2
2028	87,847	240	720	2

Responsible Witness: **Christopher A. Graf—Engineering Manager, Planning
Pennsylvania-American Water Company**

Date: **May 9, 2023**

**Pennsylvania-American Water Company – Wastewater Division (PAWC-WD)
Petition for Approval of its Second Long-Term Infrastructure Investment Plan (Second LTIIP)**

PAWC Responses to Data Request TUS - 1

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DR 2 Attachment 1

Wastewater LTIIP	2024								2025					2026					2027					2028					2024-2028					
	DISTRICT	Linear Footage	Manholes	SMH	Laterals	SL	Lift Stations	\$IP	Investment	Linear Footage	Manholes	Laterals	Lift Stations	Investment	Linear Footage	Manholes	Laterals	Lift Stations	Investment	Linear Footage	Manholes	Laterals	Lift Stations	Investment	Linear Footage	Manholes	Laterals	Lift Stations	Investment	Linear Footage	Manholes	Laterals	Lift Stations	Investment
2412-PA-McKeesport WW		12,295	50	434,601	50	298,873			\$6,403,540	10,960	40	50		\$6,010,408	11,607	50	50		\$8,365,947	10,412	50	50		\$6,117,907	11,030	45	50		\$6,539,281	56,303	235	250	0	\$33,437,083
2426-PA-Claysville WW		0	0	0	4	23,910			\$23,910	0	0	0		\$0	236	0	0		\$75,000	0	0	0		\$0	222	0	5		\$113,964	458	0	9	0	\$212,874
2435-PA-Koppel WW		2,018	0	0	5	29,887			\$935,691	557	0	0		\$255,900	541	0	0		\$256,018	526	0	0		\$256,196	511	0	5		\$295,343	4,153	0	10	0	\$1,999,148
2436-PA-Cln Trtmt WW		0	0	0	0	0			\$0	0	0	0		\$0	0	0	0		\$0	0	0	0		\$0	0	0	0		\$0	0	0	0	0	\$0
2438-PA-Paint Elk Twp WW		1,969	1	8,692	5	29,887			\$718,166	1,814	1	0		\$655,939	1,884	1	0		\$699,988	1,710	1	0		\$655,536	1,777	1	0		\$701,605	9,153	5	5	0	\$3,431,233
2447-PA-Clarion WW		6,320	5	43,460	10	59,775			\$1,912,646	4,779	5	0		\$1,467,404	5,972	5	10	1	\$3,082,855	4,514	4	10		\$1,531,898	5,014	4	10		\$1,739,601	26,599	23	40	1	\$9,734,404
2458-PA-Pocono WW		650	0	0	10	59,775			\$263,030	630	0	0		\$202,871	917	0	0		\$302,915	594	0	5		\$239,374	864	0	10		\$380,890	3,656	0	25	0	\$1,389,081
2460-PA-Fairview WW		2,269	2	17,384	10	59,775			\$531,570	1,718	2	4		\$407,522	2,140	2	7		\$5,912,885	1,465	2	7		\$426,692	1,824	2	10		\$555,320	9,416	10	38	0	\$7,833,988
2467-PA-Coatesville WW		2,507	5	43,460	60	358,647			\$1,458,669	2,433	4	50		\$1,477,693	2,362	5	50		\$1,444,870	2,293	4	50		\$1,457,125	2,227	4	50		\$1,485,578	11,822	22	260	0	\$7,323,935
2469-PA-Lehman Pike WW		1,009	0	0	20	119,549			\$439,541	817	0	20		\$421,134	322	0	20		\$255,811	599	0	20	1	\$1,263,834	8	0	20		\$174,038	2,756	0	100	1	\$2,554,358
2476-PA-Pocono BlueMtn WW		0	0	0	0	0			\$0	0	0	0		\$0	0	0	0		\$0	0	0	0		\$0	0	0	0		\$0	0	0	0	0	\$0
2483-PA-Franklin WW		410	0	0	0	0			\$79,632	35	0	0		\$4,725	388	0	0		\$79,820	33	0	0		\$4,820	378	0	0		\$54,964	1,244	0	0	0	\$223,961
2485-PA-McEwensville WW		0	0	0	0	0			\$0	0	0	0		\$0	0	0	0		\$0	0	0	0		\$0	0	0	0		\$0	0	0	0	0	\$0
2487-PA-New Cumberland WW		3,253	5	43,460	10	59,775			\$769,751	2,916	4	5		\$697,584	3,066	5	10		\$783,813	4,268	4	11		\$737,376	4,488	4	15		\$827,241	17,991	22	51	0	\$3,815,765
2492-PA-WB/Scranton WW		18,622	50	434,601	200	1,195,492			\$11,950,260	16,101	40	170		\$10,916,699	17,994	50	200		\$22,336,566	15,187	50	200		\$17,633,733	17,189	45	175		\$21,973,321	85,093	235	945	0	\$84,810,578
Subtotal		51,321	118	1,025,658	384	2,295,344	0	0	\$25,486,406	42,759	96	299	0	\$22,517,879	47,428	118	347	1	\$3,596,487	41,602	115	353	1	\$30,324,492	45,533	105	350	0	\$34,841,144.89	228,643	552	1,733	2	156766408.1
2413-PA-Exeter Twp WW		3,751	22	191,224	20	119,549		4,800,000	\$6,793,666	3,858	15	20	1	\$2,904,269	5,012	20	20	1	\$5,726,002	3,965	20	10		\$9,928,594	5,476	20	10		\$6,872,835	22,062	97	80	2	\$32,225,366
2415-PA-Sadsbury WW ¹		0	0	0	0	0	1	2,000,000	\$2,000,000	0	0	0		\$0	0	0	0		\$0	0	0	0		\$0	0	0	0		\$0	0	0	0	1	\$2,000,000
2417-PA-Royersford WW		1,250	5	43,460	10	59,775			\$603,235	1,214	5	10		\$632,557	1,178	5	10		\$619,023	1,144	4	10		\$615,074	1,111	4	10		\$623,257	5,896	23	50	0	\$3,093,146
2418-PA-UPPER POTTS GROVE WW		280	5	43,460	10	59,775			\$218,235	339	5	10		\$497,557	513	5	10		\$784,023	485	4	10		\$830,524	472	4	10		\$839,170	2,090	23	50	0	\$3,169,509
2419-PA-Kane WW		4,286	16	139,072	30	179,324			\$1,818,396	4,161	10	30		\$1,841,867	4,040	16	30	1	\$3,117,084	4,428	15	20		\$1,804,081	4,299	15	20		\$1,825,837	21,214	72	130	1	\$10,407,264
2470-PA-FOSTER TOWNSHIP WW		833	2	17,384	20	119,549			\$386,933	809	2	20		\$425,827	785	2	20		\$407,936	763	2	20		\$416,778	740	2	20		\$428,522	3,931	10	100	0	\$2,065,996
2489-PA-Turbotville WW		227	0	0	0	0			\$50,000	0	0	5		\$38,376	428	0	5		\$134,477	0	0	0		\$0	411	0	0		\$100,000	1,066	0	10	0	\$322,854
2494-PA-YORK WW		14,385	55	478,061	250	1,494,365			\$7,237,425	11,260	45	125		\$5,976,647	14,972	45	150		\$7,499,937	20,747	45	150		\$6,583,135	25,696	45	150		\$7,944,784	87,060	235	825	0	\$35,241,929
24xx -PA-Butler WW		9,375	55	478,061	110	657,520			\$4,885,581	4,854	45	150		\$3,653,529	4,713	45	175		\$3,657,323	3,922	45	175	1	\$3,249,753	6,346	45	150	2	\$4,178,870	29,211	235	760	3	\$19,625,057
Subtotal		34,387	160	1,390,722	450	2,689,856	1	6,800,000	\$23,993,471	26,496	127	370	1	\$15,970,629	31,643	138	420	2	\$21,945,807	35,454	135	395	1	\$23,427,940	44,552	135	370	2	\$22,813,274.13	172,531	695	2,005	7	\$108,151,121
Total		85,708	278	2,416,380	834	4,985,200	1	6,800,000	\$49,479,877	69,255	223	669	1	\$38,488,508	79,071	256	767	3	\$65,542,294	77,055	250	748	2	\$53,752,431	90,085	240	720	2	\$57,654,419.01	401,174	1,247	3,738	9	\$264,917,529
combined sewer systems																																		\$139,199,354

**Pennsylvania-American Water Company – Wastewater Division (PAWC-WD)
Petition for Approval of its Second Long-Term Infrastructure Investment Plan
(Second LTIP)**

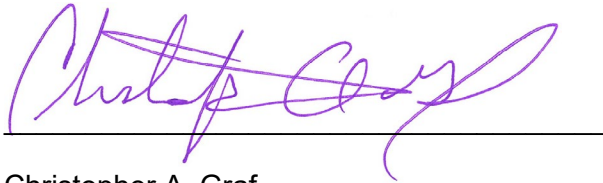
PAWC Responses to Data Request TUS - 1

Docket No. P-2023-3038874

VERIFICATION

I, Christopher A. Graf, hereby state that the facts set forth in the foregoing responses to the Bureau of Technical Utility Services Data Request Set 1, 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 if 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: May 9, 2023



Christopher A. Graf
Engineering Manager, Planning
Pennsylvania-American Water Company

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition for Approval of Pennsylvania-American :
Water Company – Wastewater Division Long- :
Term Infrastructure Improvement Plan II for the : Docket No. P-2023-3038874
Period January 1, 2024 through December 31, :
2028 :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania-American Water Company's responses to Data Request Set 1, dated April 18, 2023, from the Bureau of Technical Utility Services, upon the persons and in the manner indicated below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA Electronic Delivery

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Dated: May 9, 2023



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