



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

IN REPLY PLEASE
REFER TO OUR FILE

May 11, 2023

Docket No. A-2022-3037221
Utility Code 230073

ELIZABETH ROSE TRISCARI ESQUIRE
PENNSYLVANIA AMERICAN WATER COMPANY
852 WESLEY DRIVE
MECHANICSBURG PA 17055
ELIZABETH.TRISCARI@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 Franklin Township, Adams County, Pennsylvania at Docket No. A-2022-3037221

Dear Attorney Triscari:

On December 12, 2022, Pennsylvania-American Water Company – Wastewater Division (PAWC-WD) filed the above-referenced document (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

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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 In Application’s Section III.5., PAWC-WD averred all portions of the requested service territory depicted on a map included in the Application’s Exhibit B-1 (Service Territory Map) are owned by Michael and Sandra Baumgardner (Developer) and consists of approximately 6.8 acres (Parcel ID 12D10-0035-000 and 12D10-0038-000). However, the Commission notes that, in comparison with the on-line Adams County Tax Parcel Viewer (https://mapping.adamscountypa.gov/apps/Public_Parcel_Viewer/), Exhibit B-1 appears to consist of Parcel IDs 12D10-0037-000 (.92 acres) and 12D10-0038A-000 (4.69 acres), which are owned by Roxey Ketterman and the Developers, respectively. Please explain the parcel area, ownership, and identification number information discrepancies and revise the Application’s Section III.5. and the Application’s Exhibit B-1 as appropriate.
- A-2 The Service Territory Map does not identify the location or route of the proposed wastewater facilities. Please provide a copy of a map of suitable scale that identifies the planned location or route of the proposed wastewater collection facilities within the requested service territory.
- A-3 Please quantify the diameter, material type, and type of main (i.e., force or gravity) of the existing main depicted on the Service Territory Map.
- A-4 The Application’s Section III.6. provided a table of wastewater facilities (Facilities Cost Table) that will be installed by PAWC-WD within the requested service territory, broken down by quantity, materials, and estimated costs. Additionally, the Application’s Exhibit J included a copy of a table (Cost Estimate) that also provided the estimated construction costs and materials to construct the proposed main extension. Please provide responses to the following:
- a. In the Application’s Section III.12., PAWC-WD indicated the PENNDOT Highway Permit needed to complete this work will cost \$100. However, the Facilities Cost Table indicated a cost of \$1,000 for a Highway Permit. Please revise the Facilities Cost Table and/or the Cost Estimate to reflect PAWC-WD’s projected expenditures for the required Highway Permit;
 - b. The Facilities Cost Table and Cost Estimate included the cost to install four curb stops with boxes. Please confirm PAWC-WD intends to install curb stops on the low-pressure wastewater service lines. If not, please revise the Facilities Cost Table and Cost Estimate to remove the curb stops and boxes from PAWC-WD’s projected expenditures; and

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- c. The Facilities Cost Table and Cost Estimate included 400 linear feet of 1.5-inch diameter low pressure polyvinyl chloride pipe. Identify the intended use (i.e., services or main) of this pipe. If this pipe is to be used as service lines to the proposed lots, please revise the Facilities Cost Table and Cost Estimate to separately quantify the estimated materials and construction cost of the company-owned portion of the service lines.
- A-5 In Section III.7. of the Application, PAWC-WD indicated that the Developer will be responsible for all facilities from the curb to the new residential areas. Please provide responses to the following:
 - a. Confirm whether PAWC-WD will require grinder pumps to be installed for commercial and residential customers within the requested territory; and
 - b. If grinder pumps will be required, verify the size (i.e., horsepower) and capacity (i.e., gallons per minute) of the grinder pumps and indicate whether those facilities will be able to provide adequate service to the proposed lots.
- A-6 In Section III.7. of the Application, PAWC-WD indicated that the Developer will be paying for the cost of the facilities, including all meters and appurtenances. However, the Application’s Appendix N included a copy of estimated annual revenues based upon a monthly service charge per equivalent dwelling unit, which indicates PAWC-WD is not requiring the metering of the on-site wells. Please explain the intended use of the referenced meters for wastewater service.
- A-7 In Footnote No. 1 on Page 3 of the Application, PAWC-WD indicated that the Developer submitted the subdivision plans to the Franklin Township Planning Commission and has received conditional approval. Please provide copies of any municipal approval letters evidencing the referenced subdivision plans have received preliminary and/or final approval from the Franklin Township Board of Supervisors.
- A-8 The Application’s Exhibit C – Preliminary/Final Subdivision Plan, included a copy of a plan sheet (Plan Sheet) that is not legible and appears to have been overlaid on another document. Additionally, the Plan Sheet appears to be labelled as “Sheet 2 of 2”. Please provide a complete and legible copy, in vector graphic format, of the development plan.
- A-9 In Section III.5 of the Application, PAWC-WD indicated that the Developer’s commercial property is connected to a private well. Please clarify how water service will be or is provided to the remaining properties with the Application’s requested service territory.
- A-10 In Section III.6 of the Application, PAWC-WD indicated the Developer will pay for the wastewater main extension through a Water Facilities Line Extension Agreement (Extension Agreement) and provided a copy of a standard agreement as the Application’s

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Exhibit I which PAWC-WD indicated will be executed when the extension is approved. However, the Extension Agreement only describes the terms of a water main extension and does not include provisions for wastewater main extensions. Considering this apparent discrepancy, please provide the following:

- a. A *pro forma* “Sewer Main Extension Agreement” pursuant to Section H of PAWC-WD’s effective tariff, to be executed by PAWC-WD and the Developer;
- b. Quantification of any capacity reservation fees PAWC-WD intends to charge the Developer and identify how PAWC-WD will book said fees; and
- c. Quantification of the maximum potential refund the Developer may receive.

- A-11 In Section IV.16. of the Application, PAWC-WD indicated it will charge its existing Rate Zone 5 rates within the requested service territory and provided an excerpt of PAWC-WD’s wastewater tariff, effective date October 28, 2022, as the Application’s Exhibit M. However, after PAWC-WD filing its Application with the Commission, PAWC-WD’s filed Supplement No. 45 to Tariff Wastewater PA P.U.C. No. 16, effective January 28, 2023, that indicates the Franklin District is subject to Rate Zone 1 rates. Please clarify under which of PAWC-WD’s current tariff rate zones it intends to include the requested service territory.
- A-12 Please provide evidence that the requested service territory complies with Franklin Township’s Pennsylvania Department of Environmental Protection (DEP) approved Official Sewage Facilities Act 537 Plan (Act 537 Plan).
- A-13 If the requested service territory was not previously included in Franklin Township’s, DEP-approved Act 537 Plan, please provide a copy of the DEP-approved sewage facilities planning module for the proposed subdivision.
- A-14 Please identify the DEP permitted treatment capacity of PAWC-WD’s Franklin Township Wastewater Treatment Plant.
- A-15 Please provide a copy of the most recent Chapter 94 Municipal Wasteload Management Report PAWC-WD filed with the DEP for its wastewater facilities in Franklin Township.
- A-16 Please state whether PAWC-WD and the Developer are affiliated with one another.
- A-17 Please explain how approval of the Application would benefit PAWC-WD’s existing customers.
- A-18 Pursuant to the Secretarial Letter served April 26, 2023, at this docket, please provide the following:

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- a. Proof that notice of the Application was published once a week for two consecutive weeks in a newspaper having a general circulation in the area of the requested service territory; and
- b. Proof that a copy of the Application was served to the entities identified, pursuant to Commission Regulations at 52 Pa. Code, §1.57 and §1.58.

A-19 Pennsylvania-American Water Company’s (PAWC) website at <https://www.amwater.com/paaw/customer-service-billing/your-water-and-wastewater-rates>, contains a link to an electronic copy of PAWC-WD’s effective wastewater tariff, Supplement No. 45 to Tariff Wastewater PA P.U.C. No 16, effective April 1, 2023, that appears to be missing the First Revised Page 34 containing Section H – Line Extensions. Please update and/or revise the link provided on PAWC’s website to direct users to a complete copy of PAWC-WD’s effective tariff.