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July 10, 2023

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

VIA ELECTRONIC FILING

**RE: The Borough of Ambler Supplement No. 40 to Tariff Water – PA. P.U.C. No. 5;
Docket No. R-2022-3031704**

**Petition For Approval of Borough of Ambler's Water Long-Term Infrastructure Improvement
Plan for the Period January 1, 2024, Through December 31, 2028**

Dear Secretary Chiavetta:

Pursuant to the Commission's Order entered November 10, 2022, at Docket No. R-2022-3031704, attached for filing with the Pennsylvania Public Utility Commission is the Petition for Approval of Borough of Ambler's Water Long-Term Infrastructure Improvement Plan for the Period January 1, 2024, through December 31, 2028. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare', written over a white background.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

Counsel to the Borough of Ambler

c: Steven K. Haas, Administrative Law Judge (via e-mail)
John Coogan, Administrative Law Judge (via e-mail)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

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Adeolu A. Bakare

Counsel to the Borough of Ambler

Dated this 10th day of July 2023, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket No. R-2022-3031704
	:	
Borough of Amber – Water Department	:	
Petition for Approval of Borough of Ambler's Water Long-Term Infrastructure Improvement Plan for the Period January 1, 2024, Through December 31, 2028		Docket No. P-2023-_____

**PETITION FOR APPROVAL OF
BOROUGH OF AMBLER'S
WATER LONG-TERM INFRASTRUCTURE IMPROVEMENT PLAN
FOR THE PERIOD JANUARY 1, 2024, THROUGH DECEMBER 31, 2028**

Pursuant to Act 11 of 2012 ("Act 11") which amended, among other things, Chapter 13 of the Pennsylvania Public Utility Code ("Code"), 52 Pa. Code §§ 121.1 et seq., the Pennsylvania Public Utility Commission's ("PUC" or "Commission") Final Implementation Act II of 2012, Docket No. M-2012-2293611 entered August 2, 2012, Commission's Final Supplemental Implementation Act 11 of 2012, Docket No. M-2012-2293611 entered September 21, 2016, the Borough of Ambler (the "Borough" or "Ambler") hereby files this Petition seeking Commission approval of its Long-Term Infrastructure Improvement Plan 2024 through 2028 ("LTIIIP" or "Plan"), which accompanies this Petition. If approved, the Borough's LTIIIP will be effective for the period from January 1, 2024, through December 31, 2028.

The Borough's LTIIIP includes the required elements as provided for in 66 Pa. C.S. §1352(a)(1)-(6) and 52 Pa. Code § 121.3 (the "LTIIIP Regulations"); therefore, the Plan satisfies all of the regulatory requirements for the Commission's approval of the Borough's proposed LTIIIP as set forth in Section 1352(a)(7) and LTIIIP Regulations. Accordingly, the Borough

requests the Commission approve, without modification, the Borough's proposed LTIP as set forth in the attached Exhibit No. 1.

I. INTRODUCTION AND BACKGROUND

1. The Borough is a Pennsylvania public utility that provides service to approximately 5,900 water customers within the Borough and in Lower Gwynedd, Upper Dublin, Whitemarsh and Whitpain Townships. As a Pennsylvania municipal corporation providing water service to customers outside its municipal boundaries, the Borough is subject to the regulatory authority of the Commission. In addition, the Borough must comply with drinking water, environmental and other operational standards established by the Pennsylvania Department of Environmental Protection ("DEP") and the federal Environmental Protection Agency ("EPA").

2. The names and addresses of the Borough's attorney authorized to receive all notices and communications regarding this filing are as follows:

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3. The Pennsylvania General Assembly initially codified the Commission's authority to authorize implementation of a Distribution System Improvement Charge ("DSIC") when it enacted into law Section 1307(g) of the Pennsylvania Public Utility Code under the Act of December 18, 1996, P.L. 1061, No. 156 § 1. The Borough subsequently implemented its DSIC effective January 1, 2008, with a cap of 5.0% of billed revenues. *Pa. Pub. Util. Comm'n et al. v. Borough of Ambler Water Department*, Docket No. R-00062017 (December 24, 2007). Although

previously implemented through the tariff, the Borough has not recovered expenses through the DSIC to date.

4. Act 11, which was signed into law on February 14, 2012, amended Chapters 3, 13 and 33 of the Code by, among other things, adding Sections 1350-1360 to the Code, which authorize electric, natural gas and wastewater utilities to implement a DSIC.

5. Act 11, specifically Section 1360(a) of the Code, 66 Pa. C.S. § 1360(a), provides that the Commission may accept an LTIP filed by a water utility prior to Act 11 in order to comply with Section 1352 of the Code, 66 Pa. C.S. § 1352.

6. Act 11, specifically Section 1360(b) of the Code, 66 Pa. C.S. § 1360(b), also provides the Commission with the authority to require a water utility to submit a new LTIP.

7. On August 2, 2012, the Commission entered the Final Implementation Order, which sets forth procedures and guidelines for implementing Act 11.

8. As part of the Final Implementation Order, the Commission adopted the requirements established in Section 1352 of the Code, 66 Pa. C.S. § 1352, and provides additional standards that each LTIP must meet.

9. Commission Regulations, 52 Pa. Code § 121.1 et seq. provide guidance for meeting the Commission's LTIP standards.

10. On September 21, 2016, the Commission entered a Final Supplemental Implementation Order requiring water utilities utilizing a DSIC to file a LTIP. The PUC concluded its ultimate goal is to ensure that all utilities that have implemented a Commission-approved DSIC mechanism are following uniform rules and procedures, including the filing of an LTIP prior to implementation of a DSIC.

11. Specifically, the Commission directed water utilities that have implemented a DSIC mechanism under the now repealed 1997 legislation to file an LTIP pursuant to Act 11 within 180 days of the entry of Final Supplemental Implementation Order. The Order further stated the PUC would issue a secretarial letter setting forth a staggered schedule for those water utilities with active DSICs implemented pursuant to the pre-Act 11 legislation to comply with the 180-day filing mandate.

12. The Act 11 of 2012 LTIP Filing Schedule for Water Utilities with an Approved Distribution Improvement Service Charge Secretarial Letter dated October 31, 2016, directed several water utilities with active DSICs to file LTIPs within 180 days. The Borough was not affirmatively directed to file an LTIP at the time.

13. On November 10, 2022, the Commission entered an Order approving the Borough's 2022 rate increase. *Pa. Pub. Util. Comm'n et al. v. Borough of Ambler Water Department*, Docket No. R-2022-3031704 (November 10, 2022). In its Order, the Commission also directed the Borough to comply with the requirements of the Final Supplemental Implementation Order, including filing an LTIP. *Id.*

14. Accordingly, the Borough hereby files this Petition seeking approval of the Borough's LTIP for the period January 1, 2024 – December 31, 2028. As explained below, the Borough's LTIP includes the elements required by Section 1352 and the LTIP Regulations. Further, Borough Exhibit No. 1 provides more detailed information regarding the types of property being replaced or rehabilitated and explains how the proposed infrastructure improvements will enhance reliability and customer service and demonstrates that the Plan reflects the Borough's accelerated investment in DSIC-eligible property.

II. LONG-TERM INFRASTRUCTURE IMPROVEMENT PLAN

15. Under 52 Pa Code § 121.3(a), an LTIIIP is required to include the following elements:

- (a) Identification of types and age of eligible property owned and operated by the utility for which it is seeking DSIC recovery.
- (b) An initial schedule for planned repair and replacement of eligible property.
- (c) A general description of location of eligible property.
- (d) A reasonable estimate of quantity of eligible property to be improved or repaired.
- (e) Projected annual expenditures and means to finance the expenditures.
- (f) A description of the manner in which infrastructure replacement will be accelerated and how repair, improvement or replacement will ensure and maintain adequate, efficient, safe, reliable and reasonable service to customers.
- (g) A workforce management and training program designed to ensure that the utility will have access to a qualified workforce to perform work in a cost-effective, safe and reliable manner.
- (h) A description of a utility's outreach and coordination activities with other utilities, Department of Transportation and local governments regarding the planned maintenance/construction projects and roadways that may be impacted by the LTIIIP.

16. The Borough's LTIIIP, which can be found at Exhibit No. 1, addresses each of the required elements and should be approved by the Commission.

17. The LTIIIP includes a listing of the areas served by the Borough's water system and the number of customer connections and miles of main. The condition of the system assets varies, depending on age, material, and local conditions.

18. The LTIIIP is for the five-year period from 2024 through 2028. The LTIIIP establishes how the Borough plans to continue to accelerate its rate of infrastructure replacement to rehabilitate, improve and replace aging infrastructure from January 1, 2024 – December 31, 2028.

19. The Borough discusses in the LTIP the types and age of the outside-Borough property eligible for water DSIC recovery, schedule for planned rehabilitation and replacement; location of the eligible property; reasonable estimate of the quantity of property to be improved; projected annual expenditures and measures to ensure cost effectiveness; manner in which replacement of aging infrastructure will maintain safe and reliable service; workforce management and training program; and description of outreach and coordination with other utilities, Pennsylvania Department of Transportation and other governmental agencies to coordinate work and minimize disruptions to customers.

A. IDENTIFICATION OF TYPES AND AGE OF ELIGIBLE PROPERTY OWNED AND OPERATED BY THE UTILITY FOR WHICH IT IS SEEKING DSIC RECOVERY

20. The LTIP includes an inventory and discussion of the eligible property, which is limited to the townships served outside of the Borough. Specifically, the LTIP includes the pipe material type, pipe diameter, customer meters, hydrants and valves. Additionally, the LTIP includes the pipe material type by diameter. The LTIP also includes the pipe size as a percent of total length, which is presented on a total system (inside-Borough and outside-Borough) basis.

B. AN INITIAL SCHEDULE FOR PLANNED REPAIR AND REPLACEMENT OF ELIGIBLE PROPERTY

21. The Borough recognizes the importance of continuous renewal of aging infrastructure in order to ensure and maintain adequate, efficient, safe, reliable and reasonable service to existing customers. The schedule for planning rehabilitation and replacement of eligible property section provides an overview of the planning process for replacement of aging water system infrastructure.

C. A GENERAL DESCRIPTION OF LOCATION OF ELIGIBLE PROPERTY

22. The Borough provides a description of the Borough's water system in the Introduction and Section 1 of the LTIP, at pages 1-7.

23. Section 2 of the LTIP reviews the planned rehabilitation and replacement of the eligible property outside the Borough.

24. Section 3 of the LTIP identifies the location of the DSIC-eligible categories..

D. A REASONABLE ESTIMATE OF QUANTITY OF ELIGIBLE PROPERTY TO BE IMPROVED OR REPAIRED

25. The estimated quantities of property to be improved or repaired, including mains, valves, fire hydrants, and meters, are addressed in Section 4 of the LTIP.

E. PROJECTED ANNUAL EXPENDITURES AND MEANS TO FINANCE THE EXPENDITURES

26. The projected DSIC-eligible (outside-Borough) annual expenditures for 2024 through 2028 are shown in Exhibit No. 1 Table 8. For the period 2024 through 2028, the Borough projects total annual expenditures are \$2.14 Million.

F. A DESCRIPTION OF THE MANNER IN WHICH INFRASTRUCTURE REPLACEMENT WILL BE ACCELERATED AND HOW REPAIR, IMPROVEMENT OR REPLACEMENT WILL ENSURE AND MAINTAIN ADEQUATE, EFFICIENT, SAFE, RELIABLE AND REASONABLE SERVICE TO CUSTOMERS.

27. The Borough plans to continue accelerating DSIC-eligible investment from \$269,471 Million in 2000, to a 5-year average annual investment of \$429,276 from 2024 -2028. While there may be some year-to-year variance for a small system such as the Borough's water operations, the overall acceleration of the Borough's investment in the jurisdictional service areas of its distribution system is illustrated by the upward trending slope in Figure 1.

G. A WORKFORCE MANAGEMENT AND TRAINING PROGRAM DESIGNED TO ENSURE THAT THE UTILITY WILL HAVE ACCESS TO A QUALIFIED WORKFORCE TO PERFORM WORK IN A COST-EFFECTIVE, SAFE AND RELIABLE MANNER.

28. Water DSIC-eligible projects will be constructed by qualified contractors. The Borough utilizes competitive bidding and a professional engineering consultant to manage and implement infrastructural projects. All construction projects performed by independent contractors are properly inspected. The Borough employees are actively engaged in the direct supervision of project inspections.

H. A DESCRIPTION OF A UTILITY'S OUTREACH AND COORDINATION ACTIVITIES WITH OTHER UTILITIES, DEPARTMENT OF TRANSPORTATION AND LOCAL GOVERNMENTS REGARDING THE PLANNED MAINTENANCE/ CONSTRUCTION PROJECTS AND ROADWAYS THAT MAY BE IMPACTED BY THE LTIP

29. The replacement of aging infrastructure proposed is performed in the rights of ways of the roadways and streets across the Borough's service area. As such, the Borough recognizes the importance of outreach with customers as well as coordination with other entities including utilities, state agencies such as Pennsylvania Department of Transportation and other governmental agencies.

III. SERVICE, COMMENTS AND COMMISSION REVIEW

30. The Borough is serving the Petition and the accompanying exhibit on the Commission's Bureau of Technical Utility Service and Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate and the active parties to the Borough's last base rate case at Docket No. R-2022- 3031704.

31. The Commission's LTIP regulations at 52 Pa. Code § 121.4(c), provide for a 30-day comment period for utility LTIPs. Additionally, the LTIP regulations provide that a utility LTIP will not be assigned to the Commission's Office of Administrative Law Judge unless

comments filed to LTIP "raise material factual issues." The Borough does not believe the Borough's LTIP will "raise material factual issues" or require evidentiary hearing; therefore, the Borough is not providing a proposed litigation schedule.

IV. CONCLUSION

WHEREFORE, the Borough of Ambler respectfully requests the Pennsylvania Public Utility Commission find its Water Long-Term Infrastructure Improvement Plan for the Period January 1, 2024 through December 31, 2028 contains the necessary items as provided for in Section 1352 of the Code, 66 Pa. C.S. § 1352, Commission regulations, 52 Pa. Code § 121.1 et seq., the Commission's Final Implementation Order and Final Supplemental Order and that the Pennsylvania Public Utility Commission approve the Borough's Water Long-Term Infrastructure Improvement Plan for the Period January 1, 2024 through December 31, 2028.

Respectfully submitted,



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Counsel to the Borough of Ambler

Dated: July 10, 2023



**BOROUGH OF AMBLER –
WATER DEPARTMENT**
LONG TERM INFRASTRUCTURE IMPROVEMENT PLAN

Prepared By: Gannett Fleming, Inc.

BOROUGH OF AMBLER – WATER DEPARTMENT
LONG TERM INFRASTRUCTURE IMPROVEMENT PLAN

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Introduction

The Borough of Ambler – Water Department ("Borough" or "Ambler") currently has 5,900 customer connections which serves a population of approximately 20,000 within the Borough, Lower Gwynedd Township, Upper Dublin Township, Whitemarsh Township, and Whitpain Township. The water is supplied by several sources, including nine deep wells (six in Upper Dublin, one in Lower Gwynedd and two in Ambler) and one quarry or spring well (located in Whitemarsh). These sources supply an average of 1.4 million gallons of water per day. All sources are considered groundwater sources, except the spring well which is classified as a surface water source. All sources are located within the service territory of the Ambler Borough Water Department, which includes Ambler Borough and portions of the Townships of Lower Gwynedd, Upper Dublin, Whitemarsh and Whitpain. The system is currently divided into three service areas, and is served by the supply sources noted above, storage facilities and booster pumping stations. The Borough also has interconnections with the North Wales Water Authority and Aqua Pennsylvania as reserves, in case of an emergency.

It is the goal of the DSIC program to proactively address the aging infrastructure replacement needs, and to provide its customers with safe, reliable, and cost-effective water service.

Table 1: Ambler Customer Base Statistics as of December 31, 2021

Total System						
Customer Class	No. of Customers	% of Customers	Gallons Sold (1,000)	% of Gallons Sold	Revenues	% of Revenues
Residential	5,509	93.37%	321,049	84.22%	\$2,265,470	81.27%
Commercial	253	4.29%	37,861	9.93%	\$234,409	8.41%
Industrial	16	0.27%	10,297	2.70%	\$60,481	2.17%
Other	122	2.07%	11,979	3.14%	\$227,143	8.15%
Totals	5,900	100%	381,187	100%	2,787,503	100%

Table 1 Continued: Ambler Customer Base Statistics as of December 31, 2021

Inside Borough						
Customer Class	No. of Customers	% of Customers	Gallons Sold (1,000)	% of Gallons Sold	Revenues	% of Revenues
Residential	1,968	90.23%	114,437	80.20%	\$779,921	78.56%
Commercial	166	7.61%	24,881	17.44%	\$149,603	15.07%
Industrial	13	0.60%	3,222	2.26%	\$21,546	2.17%
Other	34	1.56%	152	0.11%	\$41,718	4.20%
Totals	2,181	100%	142,692	100%	992,788	100%

Outside Borough						
Customer Class	No. of Customers	% of Customers	Gallons Sold (1,000)	% of Gallons Sold	Revenues	% of Revenues
Residential	3,541	95.21%	206,612	86.63%	\$1,485,549	82.77%
Commercial	87	2.34%	12,981	5.44%	\$84,806	4.73%
Industrial	3	0.08%	7,075	2.97%	\$38,935	2.17%
Other	88	2.37%	11,827	4.96%	\$185,425	10.33%
Totals	3,719	100%	238,495	100%	1,794,715	100%

Note: Other includes public use and public/private fire service (sprinklers and hydrants).
 Note: Revenues for inside Borough and outside Borough are allocated based on the Bill Analysis results of the Rate Study and Data in Support of Proposed Supplement No. 40 to Tariff Water PA P.U.C. No. 5, Schedule 7 in Docket No. R-2022-3031704.

Table 2: Ambler Borough Water Mains Inventory by Diameter & Material

Inside Ambler Borough			Length (Diameter and Material)		Length (Diameter Only)	
Diameter	Material	Count of Street Locations	(Feet)	(Miles)	(Feet)	(Miles)
2	Steel	3	1,760	0.33	1,760	0.33
4	Cast Iron	23	40,505	7.67	46,912	8.88
	Asbestos Cement	5	2,630	0.50		
	Ductile Iron	8	3,777	0.72		
6	Cast Iron	25	12,107	2.29	29,047	5.50
	Asbestos Cement	25	11,213	2.12		
	Ductile Iron	15	5,727	1.08		
8	Cast Iron	17	5,720	1.08	8,655	1.64
	Asbestos Cement	3	1,280	0.24		
	Ductile Iron	6	1,655	0.31		
10	Cast Iron	8	2,560	0.48	3,170	0.60
	Ductile Iron	1	610	0.12		
12	Cast Iron	9	2,711	0.51	2,711	0.51
Total Length Inside Borough:					92,255	17.47

Table 2 Continued: Ambler Water Mains Inventory by Diameter & Material

Outside Ambler Borough			Length (Diameter and Material)		Length (Diameter Only)	
<u>Diameter</u>	<u>Material</u>	<u>Count of Street Locations</u>	<u>(Feet)</u>	<u>(Miles)</u>	<u>(Feet)</u>	<u>(Miles)</u>
2	Steel	8	3985	0.75	3,985	0.75
3	Steel	2	450	0.09	450	0.09
4	Cast Iron	79	44,000	8.33	49,520	9.38
	Asbestos Cement	2	730	0.14		
	Ductile Iron	17	4,790	0.91		
6	Cast Iron	61	35,925	6.80	92,318	17.48
	Asbestos Cement	63	42,725	8.09		
	Ductile Iron	27	13668	2.59		
8	Cast Iron	21	9,365	1.77	97,427	18.45
	Asbestos Cement	78	52,750	9.99		
	Ductile Iron	56	35,312	6.69		
10	Cast Iron	7	9,720	1.84	14,590	2.76
	Asbestos Cement	7	4,870	0.92		
12	Cast Iron	17	10,505	1.99	17,495	3.31
	Asbestos Cement	8	6,990	1.32		
Total Length Outside Borough:					275,785	52.23

Table 3: Ambler Water Mains Inventory by Vintage and Original Cost

Inside and Outside Borough				
<u>Vintage</u>	<u>Original Cost</u>	<u>Percent of Total</u>	<u>Summary Percentage</u>	<u>Vintage Grouping</u>
2023	\$ 318,825	4.85%	84.39%	Less Than 50 Years Old
2022	975,641	14.85%		
2021	769,191	11.71%		
2020	102,194	1.56%		
2019	237,038	3.61%		
2018	329,067	5.01%		
2016	160,263	2.44%		
2015	2,026	0.03%		
2014	2,495	0.04%		
2010	34,443	0.52%		
2009	10,520	0.16%		
2007	383,736	5.84%		
2006	88,670	1.35%		
2005	67,268	1.02%		
2004	37,894	0.58%		
2003	55,363	0.84%		
2002	62,205	0.95%		
2001	111,433	1.70%		
2000	79,628	1.21%		
1999	87,924	1.34%		
1998	52,455	0.80%		
1997	186,851	2.84%		
1996	37,334	0.57%		
1995	12,524	0.19%		
1994	69,602	1.06%		
1993	163,367	2.49%		
1990	19,789	0.30%		
1989	4,214	0.06%		
1987	152,506	2.32%		
1985	78,467	1.19%		
1984	93,805	1.43%		
1982	42,749	0.65%		
1981	107,057	1.63%		
1980	149,963	2.28%		
1979	241,299	3.67%		
1978	18,277	0.28%		
1977	96,358	1.47%		

Table 3 Continued: Ambler Water Mains Inventory by Vintage and Original Cost

Inside and Outside Borough				
<u>Vintage</u>	<u>Original Cost</u>	<u>Percent of Total</u>	<u>Summary Percentage</u>	<u>Vintage Grouping</u>
1976	22,151	0.34%		Less Than 50 Years Old, Continued
1975	10,130	0.15%		
1974	70,007	1.07%		
1973	22,000	0.33%	10.36%	Between 50 and 75 Years Old
1972	20,715	0.32%		
1971	80,404	1.22%		
1970	12,182	0.19%		
1969	64,693	0.98%		
1968	4,384	0.07%		
1967	15,394	0.23%		
1966	19,007	0.29%		
1965	33,999	0.52%		
1964	11,251	0.17%		
1963	30,747	0.47%		
1962	9,600	0.15%		
1961	56,855	0.87%		
1960	21,407	0.33%		
1959	35,574	0.54%		
1958	17,775	0.27%		
1957	2,602	0.04%		
1956	2,537	0.04%		
1955	68,202	1.04%		
1954	38,968	0.59%		
1953	35,327	0.54%		
1952	31,639	0.48%		
1951	14,445	0.22%		
1950	17,974	0.27%		
1949	8,541	0.13%		
1948	4,815	0.07%		
1947	6,667	0.10%		
1946	11,198	0.17%		
1945	66	0.00%		
1944	327,020	4.98%		
Totals	\$ 6,570,717	100%	100%	

Note: Original costs are estimated for 2023, and that vintage accuracy will be updated as the GIS records are completed.

1.0 Types and Age of Eligible Property

Ambler has developed and is updating a Geographic Information System ("GIS") database as a spatial tracking system for its assets. GIS data includes water assets such as mains, valves, hydrants, services, meters, supplies, pumping stations, and storage facilities with critical information regarding the system attributed to the spatially located features. The GIS is populated with the Borough's assets which has been utilized for prioritization of improvements within the Ambler water system. Table 4 below presents information on Ambler's outside Borough distribution assets ("DSIC-eligible") based on its continuing property records as of December 31, 2022.

The Pennsylvania Public Utility Commission ("PUC") recommends that systems reduce cast iron piping ("CIP") within a system. There are approximately twenty-one (21) miles of CIP remaining in the outside Borough water system. Table 5 provides a summary, as of December 31, 2022, of remaining outside Borough CIP.

Table 4: Outside Borough Eligible Property Summary

Outside Ambler Borough		
<u>Items</u>	<u>Quantity</u>	<u>Unit</u>
Mains	275,785	LF
Valves	762	EA
Hydrants	214	EA
Meters	3,644	EA

Table 5: Outside Borough Remaining CIP as of December 2022

Outside Ambler Borough					
<u>Diameter</u>	<u>Material</u>	<u>Count of Street Locations</u>	<u>(Feet)</u>	<u>(Miles)</u>	<u>Percentage of Total (275,785)</u>
4	Cast Iron	79	44,000	8.33	15.95%
6	Cast Iron	61	35,925	6.80	13.03%
8	Cast Iron	21	9,365	1.77	3.40%
10	Cast Iron	7	9,720	1.84	3.52%
12	Cast Iron	17	10,505	1.99	3.81%
Total Length Outside Borough:			109,515	20.74	39.71%

2.0 Schedule for Planned Repair and Replacement of Eligible Property

The Borough recognizes that to supply safe and reliable water service to its customers, continual maintenance of the distribution system is required. In the past, Ambler has prioritized infrastructure renewal with focus on replacement of old, undersized mains. Proposed distribution main improvements include the accelerated replacement of the old, undersized mains, those that will eliminate dead ends to improve system hydraulics, those that can be modified/replaced to improve water quality, and those that address pipes that exhibit frequent main breaks or excessive leakage.

Table 6 lists projected Outside-Borough capital improvement projects for the 5-year period 2024-2028.

Table 6: Outside Ambler Borough Five-Year (2024-2028) DSIC Eligible Capital Improvement Program

Main Replacement Projects Including Valve, Hydrants and Lateral Connections Replacements									
Location	Start of Intersection	End of Intersection	Main Diameter	Proposed Material	Length (LF)	Municipality	Valves	Hydrants	Lateral Connections
Andross Avenue	Bethlehem Pike	Cedar Road	4", 6" & 8"	Ductile Iron	1,320	Upper Dublin	7	2	21
Schiavone Drive	Farm Lane	Van Sant Lane	4", 6" & 8"	Ductile Iron	745	Upper Dublin	4	1	9
Church Street	Bethlehem Pike	South Main Street	4", 6" & 8"	Ductile Iron	3,007	Lower Gwynedd Township	24	6	72
Madison Avenue	Montgomery Avenue	Prospect Avenue	4", 6" & 8"	Ductile Iron	1,550	Upper Dublin	7	3	25
Ambler Road	Bannockburn Avenue	Ellerslie Avenue	6" & 8"	Ductile Iron	1,375	Upper Dublin	16	2	28

Number of Outside-Borough Meter Replacements by Year - Based on Meters Over the Age of 20					
Size of Meter	2024	2025	2026	2027	2028
5/8"	277	312	424	364	270
1"	20	14	15	10	12
>1"	3	3	3	6	3
Total	300	329	442	380	285

Note: None of the projects in Table 6 resulted from an apportionment of the cost of upgrades and replacement to facilities located within the Borough of Ambler to PUC-jurisdictional customers.

3.0 Location of Eligible Property

Eligible property in the Ambler system includes finished water distribution pipelines and facilities that are DSIC eligible:

- Distribution water mains and valves
- Hydrants
- Service lines (owned by Ambler)
- Water meters

The Ambler water distribution system is located in Montgomery County. As described in the Introduction, the system service area includes the Borough of Ambler, but the DSIC-eligible property is located in the outside Borough service territory consisting of Lower Gwynedd Township, Upper Dublin Township, Whitmarsh Township, and Whitpain Township.

4.0 Reasonable Estimate of the Quantity of Eligible Property to Be Improved

The quantity of eligible property to be improved has been estimated based on projected annual revenues and availability of funds, with allowances for emergencies and other infrastructure improvement projects (supply, treatment, pumping, storage facilities). Pipeline replacement work that Ambler can reasonably address is based on length of pipe, whereas other assets are based on annual budgeted dollar amounts. Actual quantities and scheduling may change depending on numerous factors but will always be guided by customer service needs for safe, reliable, high-quality water.

Planned outside Borough capital projects for the five-year period 2024-2028 are summarized in Table 7. Specific outside Borough improvement projects are listed in Table 6 in Section 2.0.

Table 7: Outside Borough Projected Capital Improvements on Annual Basis

Improvement		Average Annual Quantity or Cost
1	Annual Main Replacement ¹	~1,600 LF per year
2	Valves ²	~12 per year
3	Fire Hydrants	\$12,000 – \$20,000 per year
4	Meter Replacement Plan	\$150,000 per year

¹Annual Main Replacement includes valves and service lines along the length of the main.

² Estimated annual valve replacement quantities include the valve replacements that occur during main replacements along the length of the main.

5.0 Projected Annual Expenditures and Measures to Ensure Cost-Effective Project Implementation

The outside Borough recorded annual expenditures, broken out by eligible property class from 2019 through April 30, 2023, and projected annual expenditures for each year from May 1, 2023, through 2028 are presented below in Table 8. Projected annual expenditures are budget estimates and may vary depending on contractor bid prices and construction activity.

The Borough pursues cost-effective construction practices to ensure that resources are appropriately reinvested to maintain a system which provides safe, reliable, high-quality water to its customers. Measures to ensure cost-effectiveness include:

1. Competitive bidding is used to obtain the best possible price for each project.
2. Ambler supplies piping and necessary fittings and appurtenances, when appropriate, eliminating third-party markup.
3. Ambler performs inspections during construction to verify quality of work.

Table 8: Recorded and Projected DSIC Eligible System Expenditures 2020-2028 Outside the Borough

Account	Account Description	Outside Borough - Recorded and Projected DSIC Eligible Expenditures by Year									
		2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
330	Distribution Reservoirs and Standpipes	\$0	\$14,497	\$64,260	\$0	\$0	\$0	\$0	\$0	\$0	\$0
331.1	Transmission Mains	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
331.2	Distribution Mains	\$237,038	\$102,194	\$535,738	\$225,339	\$138,513	\$202,880	\$215,560	\$215,560	\$278,960	\$291,640
333	Services	\$6,826	\$4,961	\$3,868	\$15,474	\$20,658	\$49,600	\$52,700	\$52,700	\$68,200	\$71,300
334	Meters	\$19,663	\$64,610	\$47,993	\$92,879	\$357,843	\$101,241	\$109,531	\$145,856	\$127,132	\$95,121
335	Hydrants	\$5,944	\$0	\$2,497	\$0	\$29,927	\$11,520	\$12,240	\$12,240	\$15,840	\$16,560
	Total:	\$269,471	\$186,261	\$654,356	\$333,692	\$546,941	\$365,241	\$390,031	\$426,356	\$490,132	\$474,621

Note: Distribution Mains expenditures per year include the main replacement and valve replacement costs.

6.0 Acceleration Plan and Maintenance of Safe and Reliable Service

The Borough has invested in its water distribution system to maintain safe, reliable, and high-quality water for their customers. As such, Ambler will advance their maintenance and improvement plan as shown in Table 8 (see Section 5.0) and in Figure 1 below. The rolling five-year average in Figure 1 shows that while expenditures may rise or fall in an individual year, the overall expenditures have been accelerating since 2019 and will continue to do so through 2028.

Ambler will be increasing the safety and reliability of the distribution system as cast iron and asbestos cement pipes are more susceptible to breaks, leaks, corrosion, etc.

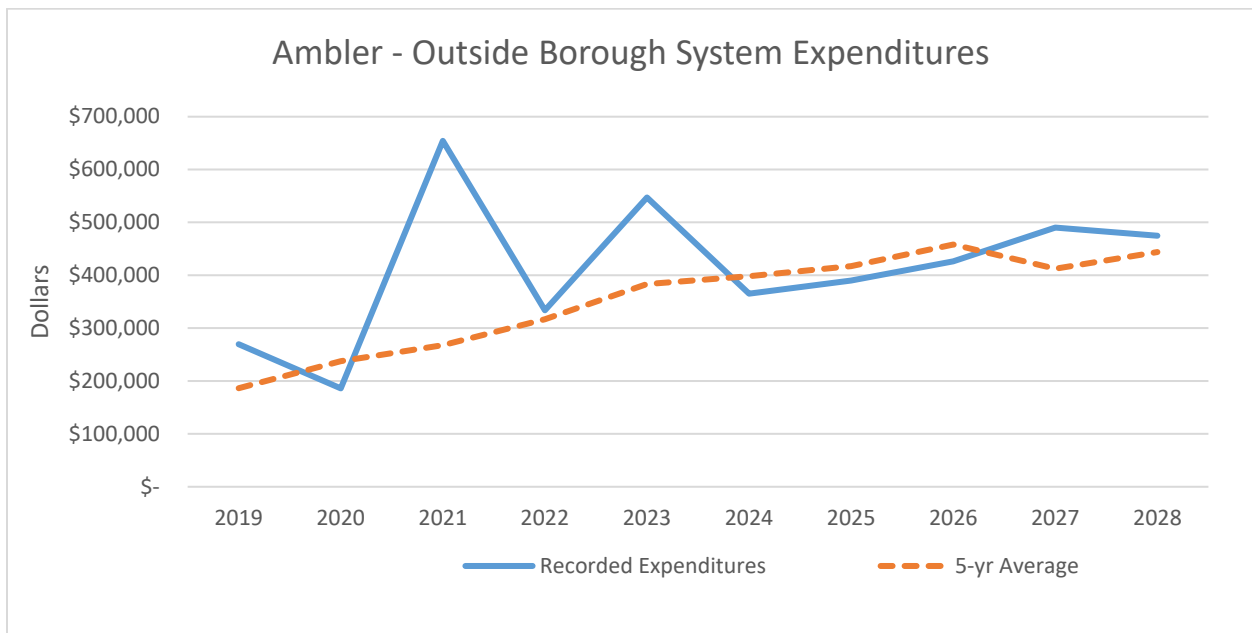


Figure 1: Acceleration of Outside Borough Water System Expenditures.

7.0 Workforce Management and Training Program

The Borough uses competitive bidding, an experienced and qualified inspection staff, and a professional and capable engineering consultant in connection with implementation of infrastructure improvement projects.

Ambler is familiar with the contractors in the area and evaluates bids on more than a cost basis. Contractor qualifications, capabilities, workload, and history on Borough projects are all factors when setting recommendation to Council for selecting a contractor.

The Borough and its consultant inspect the work contractors perform to insure it is completed in accordance with design plans and specifications, PUC requirements, regulatory agency permits, and accepted practice. Ambler also performs required flushing in-house and requires contractors to complete coliform bacteria testing in accordance with regulatory requirements and AWWA standards with qualified personnel before transferring service to a new main.

Furthermore, Ambler provides for staff's continual learning and training by:

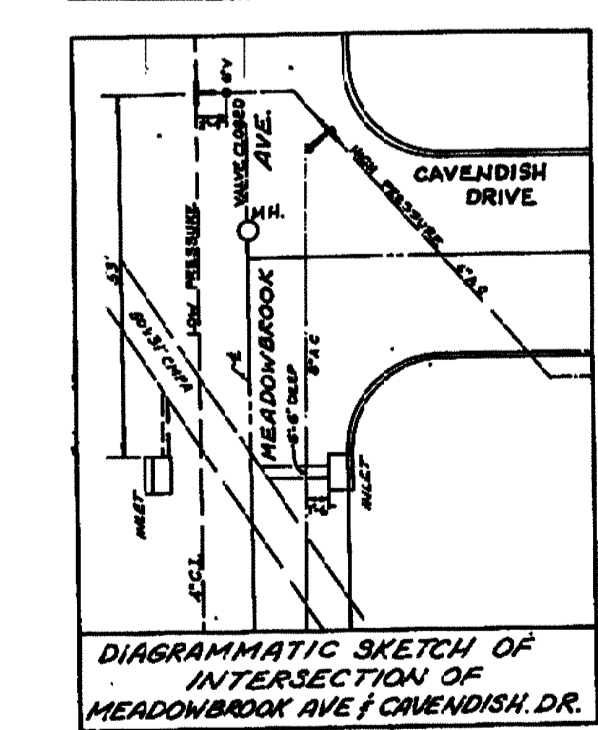
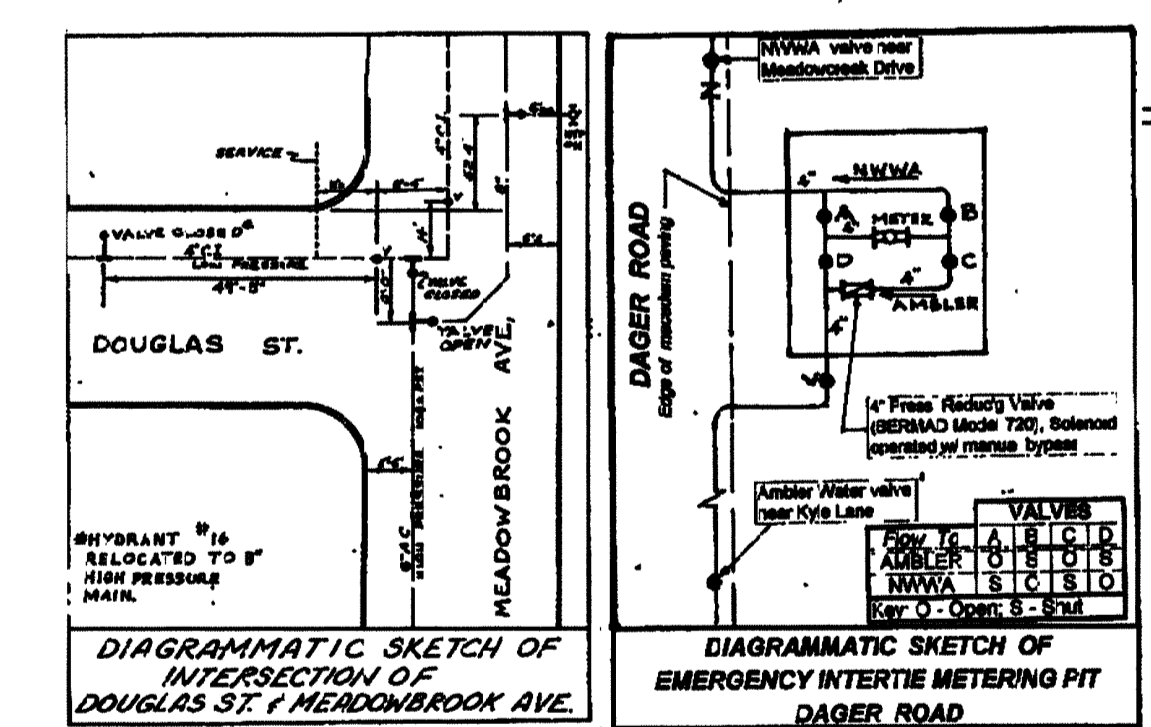
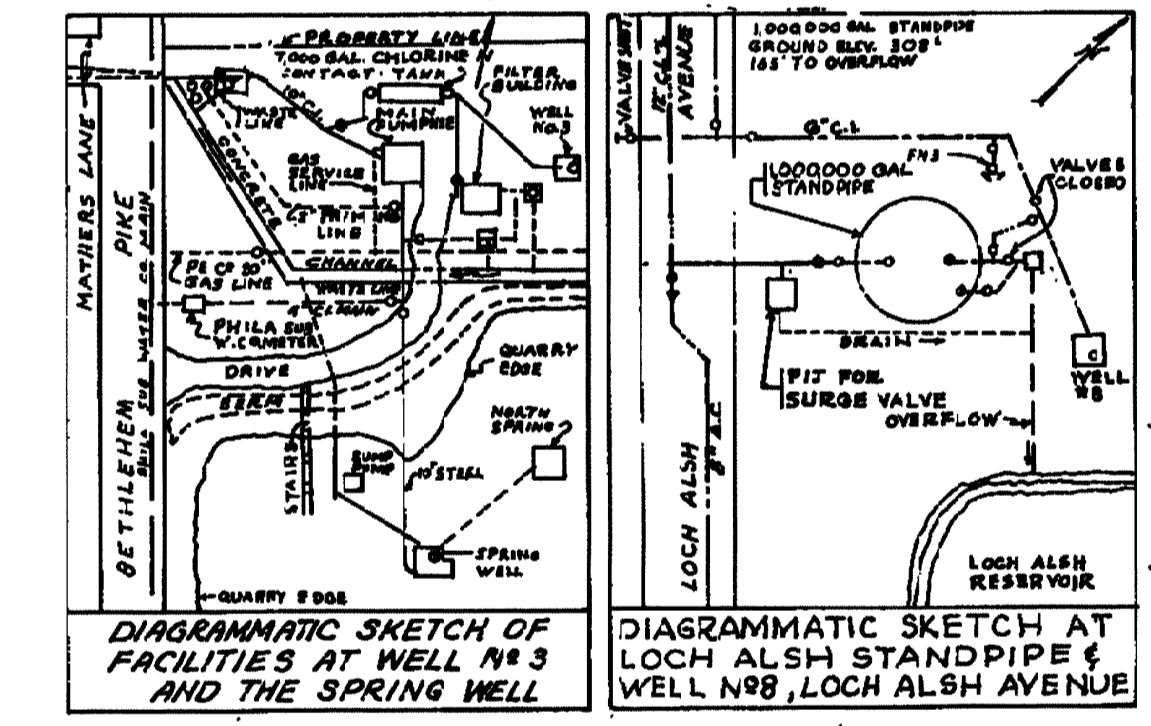
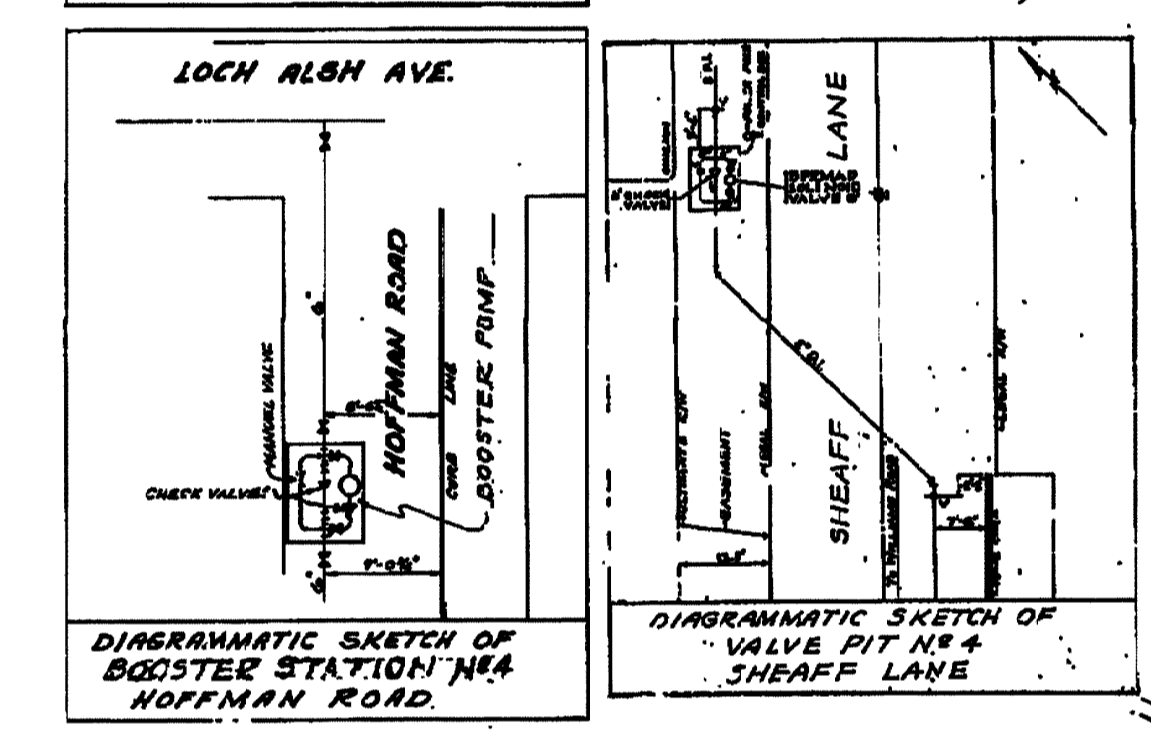
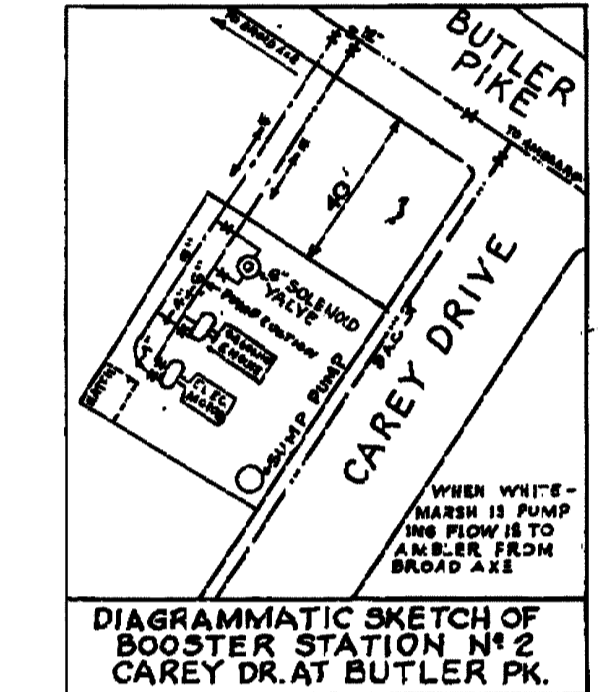
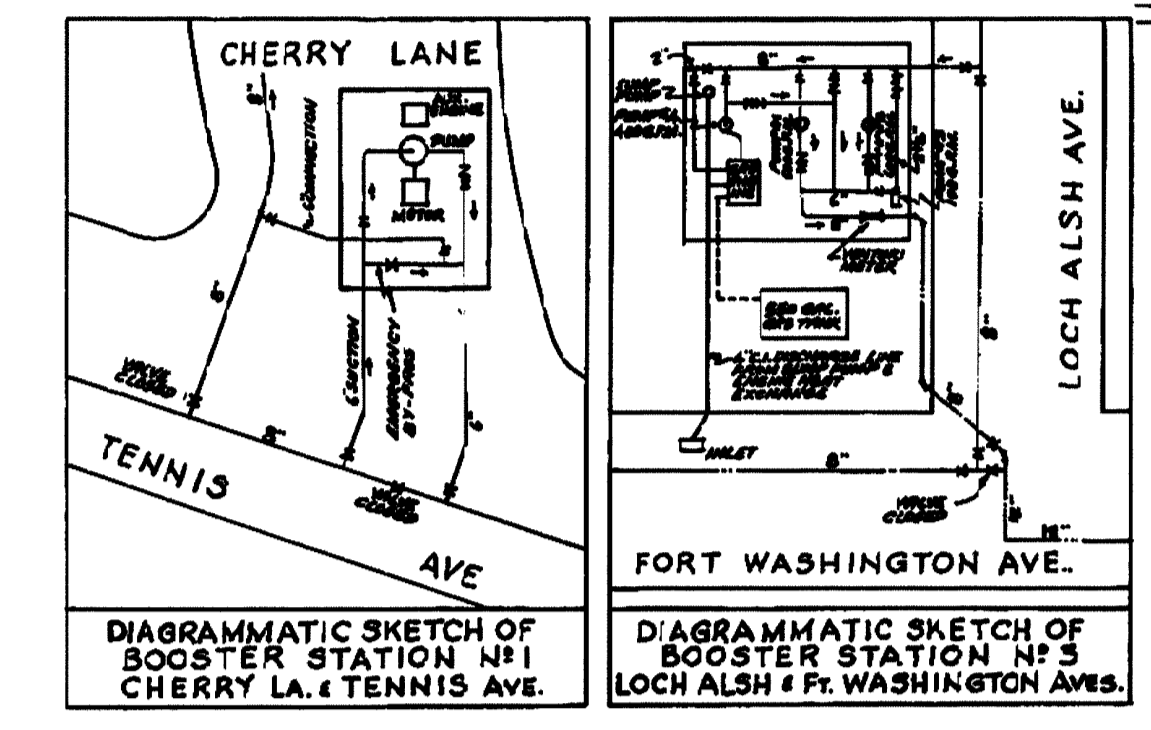
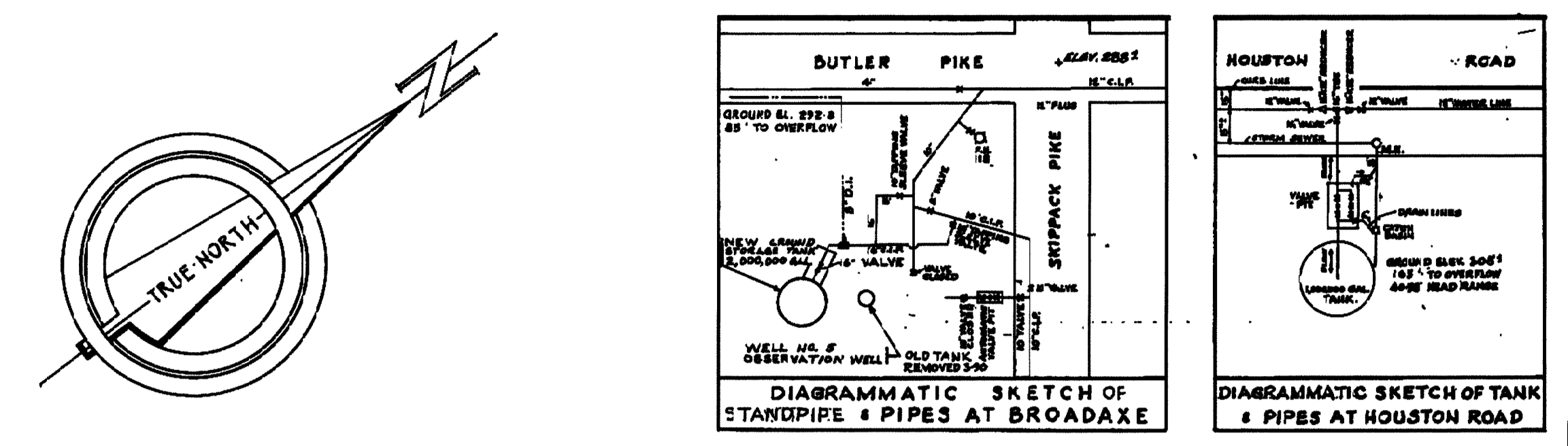
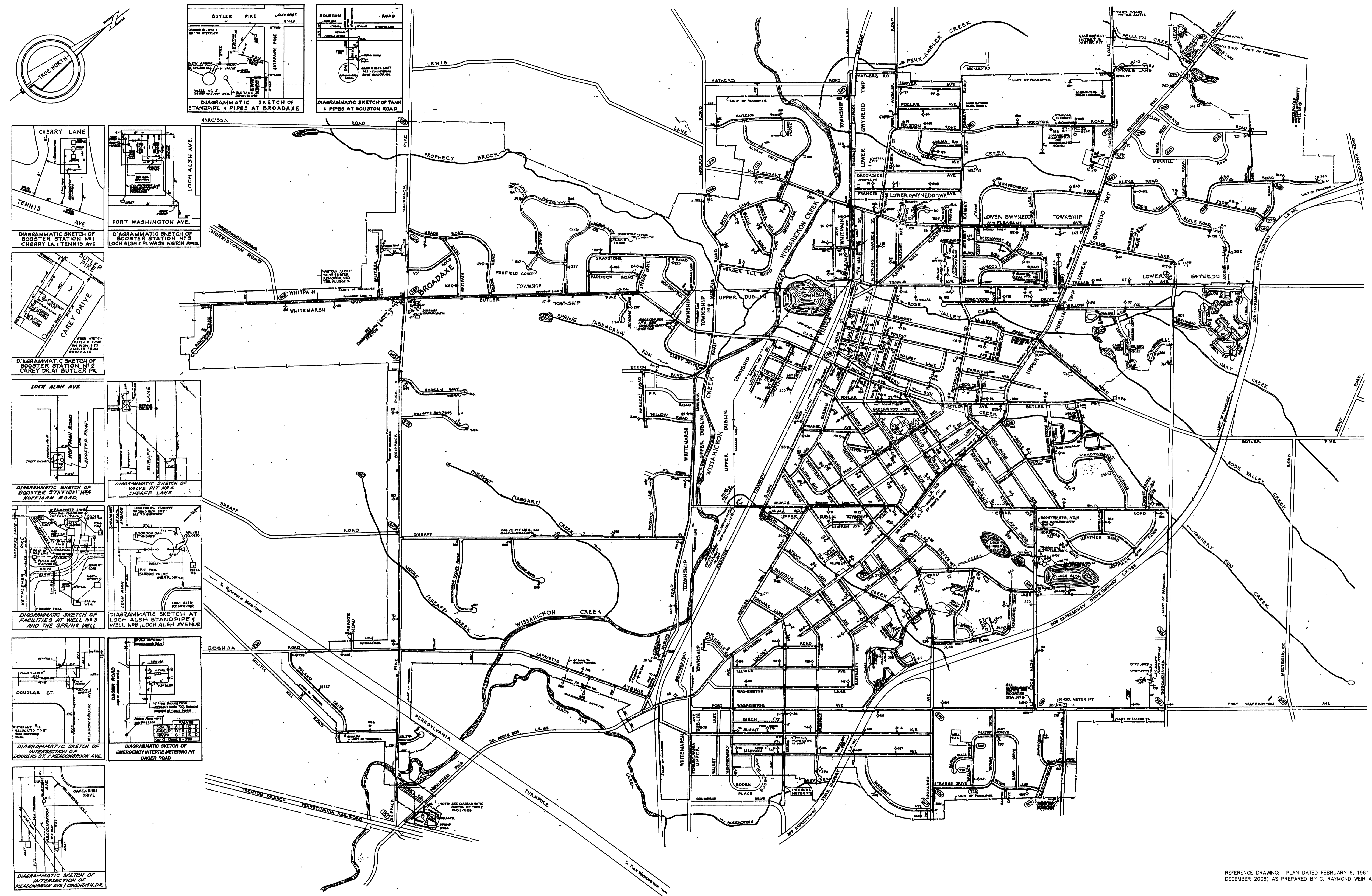
1. Holding a weekly safety meeting.
2. Having staff participate in CEU courses to maintain professional waterworks operator licenses.
3. Reviewing and taking safety training courses (confined space entry, construction site safety, hazardous materials, trenching and excavating, etc.)

8.0 Outreach and Coordination with Utilities, PennDOT and Other Governmental Agencies

During the planning and design phases, Ambler works with other utilities to prevent conflicts with underground utilities. This requires the use of Pennsylvania's One-Call system for design notifications to mark out buried utilities. When utilities appear to be in conflict or are in close proximity to proposed work, the Borough coordinates with the necessary utility to ensure existing utilities are not impacted/disturbed.

Maintaining communication among stakeholders is important to stay informed about planned utility and paving projects. Ambler will adjust water main replacement schedules as appropriate to minimize street restoration costs. Coordination with utilities, municipalities, PennDOT, and other governmental agencies may require alteration of construction timelines.

Replacement of aging infrastructure proposed in this LTIIP will also disrupt rights-of-way and streets within the service area. Providing a traffic control plan to reroute traffic is important to maintain traffic flow during construction. Minimizing disruptions increases efficiency and cost effectiveness while decreasing the number of resident complaints. Residents are notified of proposed construction with information letters and electronic communication methods (website, email, social media, etc.) outlining the proposed work.



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REFERENCE DRAWING: PLAN DATED FEBRUARY 6, 1964 (LAST REVISED DECEMBER 2006) AS PREPARED BY C. RAYMOND WEIR ASSOCIATES, INC.

LEGEND

- 2 INCH PIPE
- 4 INCH PIPE
- 6 INCH PIPE
- 8 INCH PIPE
- 10 INCH PIPE
- 12 INCH PIPE
- VALVE
- FIRE HYDRANT
- RIGHT ANGLE DRIVE
- ELEVS. AT ROAD INTERSECTIONS

OWNER: AMBLER BOROUGH 122 E. BUTLER AVENUE AMBLER, PA 19002	REV.:	DESCRIPTION:	DATE:	BY:
MUNICIPAL FILE NO.:	TAX MAP PARCEL NO.:	PLAN OF DISTRIBUTION SYSTEM SHOWING PIPE LINES, VALVES, FIRE HYDRANTS & STORAGE TANKS OF THE AMBLER BOROUGH WATER DEPARTMENT LOCATED IN AMBLER BOROUGH & THE TOWNSHIPS OF UPPER DUBLIN, WHEATMASH, WHITPAIN, & LOWER GWYNEDD MONTGOMERY COUNTY, PENNSYLVANIA.		
DATE: 11-13-07	TOTAL AREA:	TOTAL LOTS:	SCALE: 1" = 600'	
DESIGNED BY: WTM		DRAWN BY: WTM/MBB		CHECKED BY: RCS
GILMORE & ASSOCIATES, INC. ENGINEERING & CONSULTING SERVICES 350 EAST BUTLER AVENUE, NEW BRUNSWICK, NJ 08901-4210		JOB NO.: 2008-01015		
SHEET NO.:		1 OF 1		

VERIFICATION

I, Mary Aversa, as Borough Manager for the Borough of Ambler, hereby state that the facts set forth above 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).

Dated: 6/30/23



Mary Aversa, Borough Manager