



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

IN REPLY PLEASE  
REFER TO OUR FILE

August 30, 2023

Docket No. P-2023-3041845

Utility Code 210540

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RE: Petition of Columbia Water Company for Approval of its Lead Service Line Replacement Program, Modification of its Long-Term Infrastructure Improvement Plan and Waiver of Commission Regulations Regarding Termination Requirements at Docket No. P-2023-3041845

Dear Attorneys Synder, Sniscak, and Demanchick:

On July 21, 2023, Columbia Water Company (Columbia Water) filed the above-captioned document (Petition) 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. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

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

Please note 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 review, please send a copy of the response to Matthew T. Lamb, P.E. in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at [mlamb@pa.gov](mailto:mlamb@pa.gov). Please also direct any questions to Matthew Lamb at telephone number (717) 783-1001. 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@paoca.org](mailto:ra-oca@paoca.org)  
Christine Hoover, Office of Consumer Advocate (w/enclosure), [choover@paoca.org](mailto:choover@paoca.org)  
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## TUS Data Request Set 1

### Petition of Columbia Water Company for Approval of its Lead Service Line Replacement Program, Modification of its Long-Term Infrastructure Improvement Plan and Waiver of Commission Regulations Regarding Termination Requirements at Docket No. P-2023-3041845

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.

- P-1. Section III.B.21 of Columbia Water’s Petition for a Lead Service Line Replacement Program (LSLR Program) indicated that Columbia Water plans to replace approximately 50 lead service lines (LSLs) per year with a projected annual investment in lead service line replacements (LSLRs) of \$250,000. Additionally, Columbia Water indicated an average cost of \$5,000 per LSLR based on the company’s average cost from previous service line replacements. Please provide responses to the following:
- a. Clarify if the \$250,000 projected annual investment includes only customer-owned LSLs or the entirety of the LSL (both the company and customer-owned portions);
  - b. Provide a detailed breakdown of the estimated average cost to replace the company-owned portion of an LSL, and
  - c. Provide a detailed breakdown of the estimated average cost to replace the customer-owned portion of an LSL.
- P-2. Section III.C.24.b. of the LSLR Program, Page 2 of the Lead Service Line Replacement Plan (LSLR Plan) included as the Petition’s Exhibit 1, and Page 14 of the modified long-term infrastructure improvement plan (Modified LTIIIP) included as the Petition’s Exhibit 4 indicated that once targeted areas are determined, the projects will be posted on the Columbia Water website at least six months in advance of the work being done. Please explain if the term “targeted area” is intended to be equal to the term LSLR project area as defined in 52 Pa. Code § 65.52. If so, please amend the LSLR Program, LSLR Plan, and Modified LTIIIP to replace each instance of the term “targeted area” with the term LSLR project area.
- P-3. Section III.E.31 of the LSLR Program specified that when an LSL is discovered at a property, Columbia Water will contact the customer(s) and/or property owner to let them know of the discovery. Please clarify the method(s) Columbia Water intends to use to make this contact.
- P-4. Section III.G.43 of the LSLR Program indicated that Columbia Water is in the process of incorporating its service line inventory into its geographic information system (GIS). Please provide an estimated timeframe for the integration of the service line inventory into the GIS.
- P-5. Section III.K.54 of the LSLR Program indicated a secure, online interactive map will be provided for customers to have the ability to determine if an LSL may exist at the customer’s property. Please provide an estimated timeframe of when Columbia Water intends to have the secure, online interactive map available to its customers.

TUS Data Request Set 1

Petition of Columbia Water Company for Approval of its Lead Service Line Replacement Program, Modification of its Long-Term Infrastructure Improvement Plan and Waiver of Commission Regulations Regarding Termination Requirements at Docket No. P-2023-3041845

- P-6. The LSLR Plan’s Section 1 indicated that Columbia Water plans to identify, at a minimum, a cumulative average of 10.0% of the initial unknown service materials annually by using existing records, modeling, statistical analysis, and mechanical excavation. Please provide responses to the following:
- a. Define the terms “modeling” and “statistical analysis”, explain how these methods will be used to identify service line materials, and provide the timeframe Columbia Water will start employing these aspects of service line identification; and
  - b. Quantify the projected annual expenditure to complete the service line inventory activities over the next 10 years based on the identified 10.0% cumulative average.
- P-7. The LSLR Plan’s Section 2 and the Pro Forma Tariff’s Original Page No. 60 indicated that Columbia Water may stand in the shoes of the property owner and is authorized to replace a customer-owned LSL under certain circumstances. Please explain the legal standard under which Columbia Water would be permitted to complete a LSLR under the defined circumstances.
- P-8. The Petition’s Exhibit No. 2, Service Line Inventory (July 2023 Inventory) dated July 21, 2023, provided a detailed list of Columbia Water’s known and unknown service line materials for its water system. Please submit a copy of the July 2023 Inventory in a live electronic spreadsheet format.
- P-9. The Pro Forma Tariff’s Section 28 on Original Page No. 63 contains a paragraph numbering error with repeating numbers seven and eight that results in apparent numbering errors for subsequent numbers. Please provide a revised Pro Forma Tariff that corrects the paragraph numbering errors for Section 28.
- P-10. The Modified LTIIIP included Section 9 that addressed Columbia Water’s LSLR Plan. However, the Modified LTIIIP did not update all of the other applicable sections, charts, and graphs to reflect the incorporation of the LSLR Plan. Please submit final and redlined copies of a Modified LTIIIP that includes the necessary updates to all the applicable sections, charts and graphs to reflect the inclusion of the LSLR Plan.