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September 8, 2023

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

**VIA ELECTRONIC FILING**

**RE: Petition of Borough of Ambler Water For Approval of its Long-Term Infrastructure Improvement Plan; P-2023-3041666**

Dear Secretary Chiavetta:

Attached please find for filing with the Pennsylvania Public Utility Commission the Responses of the Borough of Ambler to the Bureau of Technical Utility Services ("TUS") Set I Data Requests.

Please note that a Verification for the responses will be separately filed. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare'.

Adeolu A. Bakare  
MCNEES WALLACE & NURICK LLC

Counsel to the Borough of Ambler

c: Ken Shaffer ([kennshaffe@pa.gov](mailto:kennshaffe@pa.gov))  
(Bureau of Technical Utility Services, Reliability and Emergency Preparedness Division)

Docket No. P-2023-3041666  
Petition of Borough of Ambler Water for Approval of its LTIP

Responses TUS Data Requests – Set 1

**TUS-1** Reference the Ambler Petition, Paragraph 27

- a. It appears that the first sentence contains an error in reference to historical DSIC-eligible spending in the millions and it is not clear if the initial amount of \$269,471 is a five-year annual average or just for the year 2000. Please clarify whether the \$269,417 amount is an actual amount, or in the millions, and clarify if the amount is a five-year average annual amount, or just for the year 2000.

**Response:**

- a. \$269,417 is the actual amount, but reference includes typographical errors. The amount is a reference to the \$269,417 annual amount spent in 2019, not 2000 (consistent with the LTIP's Table 8).

**Response Provided by: Mary Aversa, Borough Manager**

**Date: September 8, 2023**

Responses TUS Data Requests – Set 1

**TUS-2** Reference the Petition's Exhibit 1, Section 2: Schedule for Planned Repair and Replacement of Eligible Property

- a. State the general goals of Ambler's LTIP and identify any of the company's priorities for infrastructure repair and replacement. Also identify the measures Ambler plans to use to track its progress, e.g., leak rates, unaccounted for water reduction, main break rates, etc.
- b. Provide a table similar in form to Table 6 that provides the amount of main, valves, hydrants, and lateral connections to be replaced for each project in each year of the LTIP.

**Response:**

- a. The Borough priorities for infrastructure repair and replacement are a reduction in main breaks and reducing unaccounted for water. The Borough will track its progress by continuing to track main break rates and the level of unaccounted for water. Unaccounted for water since 2019 has ranged from a high of 18% to a low of 13.3%.
- b. Please see the Attachment TUS-1-2b , which is a continuation of Table 6 that provides the amount of main, valves, hydrants and lateral connections to be replaced for each project in each year of the LTIP.

**Response Provided by: Mary Aversa, Borough Manager**

**Date: September 8, 2023**

<b>Main Replacement Projects By Location - Quantities of Linear Feet, Service Laterals, Valves and Hydrants Replaced Per Year</b>					
<b>Asset Type</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>	<b>2027</b>	<b>2028</b>
<b>Schiavone Drive - Upper Dublin Township</b>					
Linear Feet	745				
Service Laterals	9				
Valves	4				
Hydrants	1				
<b>Andross Avenue - Upper Dublin Township</b>					
Linear Feet		1,320			
Service Laterals		21			
Valves		7			
Hydrants		2			
<b>Ambler Road - Upper Dublin Township</b>					
Linear Feet			1,375		
Service Laterals			28		
Valves			16		
Hydrants			1		
<b>Church Street - Gwynedd Township</b>					
Linear Feet				1,550	
Service Laterals				25	
Valves				7	
Hydrants				2	
<b>Madison Avenue - Upper Dublin Township</b>					
Linear Feet					3,007
Service Laterals					72
Valves					24
Hydrants					5

Docket No. P-2023-3041666  
Petition of Borough of Ambler Water for Approval of its LTIP

Responses TUS Data Requests – Set 1

**TUS-3** Reference Exhibit 1, Section 3: Location of Eligible Property

- a. Provide a table that specifies where the projects and or eligible property to be replaced are located.

**Response:**

- a. Please reference Table 6 in the LTIP report and the table included in response to TUS-1-2b.

**Response Provided by: Mary Aversa, Borough Manager**

**Date: September 8, 2023**

Responses TUS Data Requests – Set 1

**TUS-4** Reference Exhibit 1, Section 4: Estimate of the Quantity of Eligible DSIC Property and Reference Exhibit 1, Section 5: Projected Annual Expenditures

- a. Provide a table that specifies the projected amounts of mains, service lines, valves, hydrants, and meters that are to be replaced in each year of the LTIP.
- b. Describe in detail how Ambler will ensure its LTIP is cost-effective and how it will be financed.
- c. Describe in detail how Ambler competitively bids its capital improvement contracts and how Ambler manages its costs for materials.

**Response:**

- a. Please reference Table 6 in the LTIP report and the table included in response to TUS-1-2b.
- b. The Borough intends to finance the projects in the LTIP mostly through its capital budget in the initial years with a greater reliance on bond issuances and future rate increases in the later years. As discussed in response to No. 4(c) below, the Borough's construction contracts are competitively bid, which ensures projects are completed in a cost-effective manner.
- c. The Borough publicly bids all construction contracts, including capital improvement contracts in order to comply with its statutory requirement under the Borough Code to select the lowest qualified and responsible bidder. Through the public bidding process, the Borough reduces both labor and materials costs for its customers.

**Response Provided by: Mary Aversa, Borough Manager**

**Date: September 8, 2023**

Docket No. P-2023-3041666  
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Responses TUS Data Requests – Set 1

**TUS-5** Reference Exhibit 1, Section 6: Accelerated Replacement and Maintaining Adequate, Efficient, Safe, Reliable and Reasonable Service to Customers

- a. Describe in detail how this LTIP is a continuation of an already accelerated capital spending process.
- b. Describe in detail how this LTIP will help Ambler improve system resiliency, reliability, and safety.

**Response:**

- a. The Borough's historical annual capital spending plan has been insufficient. It is notable that the Borough's historical capital spending includes unplanned emergency capital spending in 2021 resulting from multiple main breaks. Excluding this outlier year shows the Borough's average annual capital spending projection for the 5-year LTIP (approximately \$429,000) consistently exceeds the average annual capital spending for the prior years 2019-2020 and 2022-2023 (approximately \$334,000). Accordingly the LTIP reflects an acceleration of the Borough's planned capital spending.
- b. By reducing main breaks and lowering unaccounted for water, this LTIP will help the Borough improve system resiliency, reliability and safety.

**Response Provided by: Mary Aversa, Borough Manager**

**Date: September 8, 2023**