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September 13, 2023

Via Email

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

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; Docket No. P-2023-3041845; **RESPONSES TO DATA REQUESTS OF THE BUREAU OF TECHNICAL UTILITY SERVICES**

Dear Secretary Chiavetta:

Enclosed are Columbia Water Company's Responses to Data Requests of the Bureau of Technical Utility Services in the above-referenced proceeding.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (717) 236-1300.

Very truly yours,

/s/ Phillip D. Demanchick Jr.

Whitney E. Snyder
Thomas J. Sniscak
Phillip D. Demanchick Jr.

Counsel for Columbia Water Company

PDD/jld/das
Enclosure

cc: Matthew T. Lamb, P.E., BTUS (mlamb@pa.gov)
Per Certificate of Service

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;
Docket No. P-2023-3041845

COLUMBIA WATER COMPANY'S RESPONSES TO DATA REQUESTS OF THE BUREAU OF TECHNICAL UTILITY SERVICES

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.

RESPONSE:

a. The annual cap of 50 and $250,000 included both the Company and Customer-owned portions of the LSLR. The cap specific to Customer-owned LSLRs is 25 or $125,000, whichever is less. The Company has corrected the LSLR materials to reflect a cap specific to the Customer-owned portion of the LSLRs. The Company has attached clean and red-lined versions of its revised materials.

b. See the table below:

Estimated Average Cost to Replace Company-Owned LSL				
Material	Equipment	Labor	Restoration	Total
$500.00	$1,000.00	$500.00	$3,000.00	$5,000.00

c. See the table below:

Estimated Average Cost to Replace Customer-Owned LSL				
Material	Equipment	Labor	Restoration	Total
$750.00	$1,000.00	$750.00	$2,500.00	$5,000.00

PROVIDED BY: Taz Keyser

DATE: 9/13/2023

REVISED LSLR PLAN
(REDLINE)

COLUMBIA WATER COMPANY LEAD SERVICE LINE REPLACEMENT PLAN

Definitions

Refer to the tariff for definitions.

1.0 – SERVICE LINE INVENTORY

Columbia Water Company ("CWC") has prepared its Service Line Inventory. It complies with the current United States Environmental Protection Agency ("USEPA") and Pennsylvania Department of Environmental Protection ("PADEP") guidelines. The Service Line Inventory will be updated at a minimum annually, or as additional information becomes available. If CWC purchases any water distribution system in the future, the Service Line Inventory will be updated to include the acquired system's information and meet the deadlines set forth by the Public Utility Commission ("PUC").

The Service Line Inventory will comply with the timing and direction of the USEPA regulations as enforced by the PADEP, inclusive of future changes to those regulations as may be amended from time to time. The Service Line Inventory for CWC identifies material types on both the company owned and customer owned sides of the service lines. It can be sorted by material type. All discovered lead components have been detailed.

CWC plans to identify, at a minimum, a cumulative average of 10.0% of the initial unknown service materials annually by means of utilizing existing records, modeling, statistical analysis, and mechanical excavation. There are no assumed service line materials in the Service Line Inventory.

See appendix L for the Service Line Inventory Legend and Instructions.

Incorporating the Inventory into the GIS System

CWC is in the process of incorporating the Service Line Inventory into its GIS system. Once the Service Line Inventory is on the GIS, the Service Line Inventory can be updated in real time.

2.0 – PLANNING AND REPLACEMENTS

Annual Projections

CWC ~~plans to~~estimates it can replace up to approximately 50 lead service lines per year, including 25 Company-owned lead service lines and 25 Customer-owned lead service lines. This projection was determined by estimating the total number of lead service lines to be less than 400. After all existing records have been inventoried, CWC will review this annual projection and adjust it as

necessary. The ~~projected~~ annual ~~investment in~~cap for customer-owned lead service line replacements ("LSLR") is ~~$250~~25 or $125,000, whichever is less.

Replacing Lead Service Lines in Conjunction with Old Main Replacements

These replacements will be planned. Record-reviews of old age mains within the oldest parts of the distribution system will be analyzed to determine which water mains in the distribution system should be replaced. Prior to choosing a target area, our distribution crew will review records and/or physically inspect a portion of the service lines within a proposed area to gauge the likelihood of lead within that area. Coordination with municipalities will take place to minimize costs and minimize impacts on roads and neighborhoods.

Once the ~~targeted areas~~LSLR Project Areas are determined, the projects will be posted on the CWC website at least 6 months in advance of the work being done. Prior to the work being initiated, CWC staff will reach out to the customers to determine all service line material within the affected area, and to provide the customers with detailed information regarding the routine procedures and the potential health risks involved.

Replacing Lead Service Lines Discovered by Mechanical Excavation

Areas with a higher likelihood of having lead service lines will be prioritized for these projects. CWC will physically excavate the service lines to determine material types. If a service line is determined to be lead, coordination will occur with the customer(s) and the property owner to have the service line replaced.

Replacing Customer-Owned Lead Service Lines Discovered Inside the Building

CWC will reach out to the customers with lead or unknown service lines. These customers will receive documentation describing the health effects related to lead. See appendix A for this information. They will be provided with information explaining how to determine their own service line material and what to do if they believe their service line material is lead; See appendix B for related documentation. CWC staff will be checking and documenting service line material in conjunction with meter changes. Customers who discover a lead service line may call and schedule to have their service line replaced. CWC will schedule to replace customer-owned lead service lines in accordance with the tariff. If the company side is lead, it will be replaced at the same time with the customer side. These replacements will occur as discovered.

Emergency Replacements

If a lead service line is leaking or otherwise defective at the time it is discovered, CWC will replace the lead service line in accordance with the tariff. The distribution staff will maintain the proper equipment and tools necessary for emergency service line replacements. If a lead service line is discovered during an emergency but isn't leaking, the replacement of the line will be scheduled for replacement at a later date.

Prioritization of Lead Service Line Replacements

Determination of LSLR projects will be prioritized based on targeted sensitive populations as defined by the USEPA and PADEP, which includes areas with elevated levels of lead in tap water, areas with high concentrations of lead service lines, and/or areas of the distribution system which have elevated corrosion rates. These areas are more specifically found on houses built prior to 1950 with water mains older than 1970 within Columbia Borough or Marietta Borough.

A list of sensitive populations has also been developed to determine the service line materials. The list includes schools, nursing homes, large apartment buildings, churches, and industries. These service lines have been or will be detailed as sensitive populations in the Service Line Inventory. Homes with multiple meters and multiple family residents will also be prioritized to determine service line material.

Disposal of Lead

Lead removed from any project will be disposed of at an appropriate facility to ensure proper disposal of all lead. Scrap receipts will be kept on file. The proceeds from the recycling efforts will be added to our operating revenue. The customer will not have any right to the proceeds of a recycled lead service line.

Coordination with the Property Owner and Customer(s)

When a lead service line is discovered at a property, CWC will contact the customer(s) and property owner to let them know of the discovery. Customers will be given information explaining the health effects of lead and what they should do to prevent lead in their water. See appendix A for the documentation.

CWC staff will then let the customer(s) and property owner know how to schedule to have their service line replaced and when the scheduled replacement is to occur.

Prior to replacing the property-owner's portion of a lead service line, an agreement between CWC and the property-owner, or representative of the property-owner, must be signed ("Property Owner Agreement"). See appendix C. These forms will be kept on file.

When the customer-owned LSL crosses one (or more than one) property to access another, the Company will attempt to obtain approval from all property owners to allow the work necessary to replace the Customer-Owned LSL and evaluate solutions available to install conforming service lines. If the Company is unable to obtain the neighboring property owner or owners' consent, and there is no other viable and economic solution (to be determined in the Company's sole discretion) such as installing conforming service lines, the Company will commence procedures to terminate service to the neighboring property owner or owners' property as set forth in the following section of this LSLR Plan.

Refusal of Lead Service Line Replacement

If a customer or property owner refuses to grant permission to CWC to replace the lead service line or refuses to have it replaced, Columbia Water will (1) provide the customer and property owner, if the customer is not the property owner, with a complete disclosure of the known health hazards from the continued use of a LSL, see Appendix A of the LSLR Plan, (2) inform the customer or property owner, if the customer is not the property owner, that refusal or failure to accept will require replacement of the customer-owned LSL, at the customer or property owner's expense, within 1 year from LSLR project commencement for the customer or property owner, if the customer is not the property owner, to be eligible for reimbursement; and (3) communicate to the customer and property owner, if the customer is not the property owner, that failure to allow Columbia Water to complete the LSLR or to replace the customer-owned LSL concurrent with the replacing the Company-owned LSL will lead to termination of water service under the provisions of Columbia Water's tariff.

If the customer or property owner, if the customer is not the property owner, still refuses replacement of the customer-owned LSL, the Company will require the customer or property owner, if the customer is not the property owner, to sign a form documenting their refusal. See Appendix N of the LSLR Plan. If the customer or property owner refuses or fails to sign the refusal form, the Company will make a record of and document the customer's refusal.

The Company will then schedule to replace its portion of the Company-owned LSL and notify the customer in writing of the partial LSLR no later than ten days prior to the scheduled replacement and terminate water service at that location the day prior to replacing the Company-owned LSL. Columbia Water will not connect an Applicant to water service where a property owner previously refused or failed to accept the utility's offer of a LSLR until the Applicant verifies that the replacement of a customer-owned LSL by providing a paid invoice from a licensed contractor or notarized statement from a licensed contractor attesting to completion of the LSLR.

Non-Owner Occupied Premises

The Company may stand in the shoes of the property owner and is authorized to replace a Customer-Owned LSL when (1) the Company has offered to replace at no direct cost to the property owner a Customer-Owned LSL, (2) the property is not occupied by the legal owner of the property, and (3) the Company has made attempts to obtain authorization for the Customer LSLR pursuant to this Tariff and the LSLR Plan and (a) the legal owner cannot be identified, (b) the legal owner cannot be located, or (c) the Company has notified the legal owner but the owner has never responded.

In such instances, and when, in the sole discretion of the Company, replacing the customer-owned LSL and preventing the termination of water service would be reasonable and in the public interest, the Company may proceed to make the replacement without obtaining authorization from the property owner. In any such instance of replacement, the Company, and any person associated with the Company, including but not limited to employees, agents, board members and executives, are released and held harmless from any and all claims, causes of action, damages or losses, of any

nature, whatsoever with respect to the work performed by the Company or its contractors, and shall not be otherwise liable for any claim asserted by any person, including the property owner, as a result of the LSLR except to the extent otherwise authorized by the Company's Tariff.

If, prior to completing the LSLR, a property owner expressly, in writing, refuses to allow the replacement of the customer-owned LSL, the Company will not proceed with the replacement and will proceed with termination procedures as specified in the above section of the LSLR Plan. The Company also retains discretion to refuse to replace a customer-owned LSL in circumstances where the Company's employees or contractors may be placed in a dangerous situation in attempting to do the replacement.

Warranty

Upon completion of an LSLR by the Company or a contractor at the Company's request, a Completion-Agreement Form must be signed by the CWC and the property-owner, or representative of the property-owner. See appendix D. From the date of the Completion Agreement Form, the Company will provide a two-year warranty for materials and workmanship of the replaced customer-owned portion of the Service Line. This warranty shall cover repairs conducted by the Company or a contractor at the Company's request of the replaced customer-owned portion of the Service Line up to $2,500 per customer, including restoration of surfaces consistent with this LSLR Plan, so long as the customer allows access to the property for repairs. Only material defects and incomplete installation methods are covered by the warranty. The warranty does not cover, among other things, damage caused by natural disasters, acts of God, fires, terrorism, excavation activities, acts of sabotage, or deliberate damage. The Company shall have no liability for any damages not covered by the warranty.

LSLR Routine Procedure and Restoration

Columbia Water intends to replace LSLs using existing routes through a combination of pipe splitting and/or pipe pulling. This approach removes or displaces existing pipe while simultaneously replacing it with a new pipe and is the preferred method under normal circumstances. Columbia Water may also utilize guided boring to install new pipe along a different route or using open trench excavation to remove replace the pipe. The appropriate replacement technique will depend on a combination of many site-specific characteristics, including, but not limited to, time constraints, soil characteristics, depth to ground water or rock, depth of road foundation, condition of the service line, proximity of other utility services (e.g., electric, gas, cable, sewer, storm water), site conditions (e.g., access, parking, paving, landscaping, overhead obstructions), pipe conditions (e.g., length of pipe, pipe diameter and wall thickness, bury depth, configuration, and repair history, and conditions inside the home like a finished basement with limited access to the water meter and plumbing. All new pipe installation will be copper or plastic.

See also appendix E for the LSLR Routine Procedures. These procedures will be publicly available at the main office and on the CWC website. CWC will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations in the private home. No other restoration will be conducted for Lead Service

Line Replacements. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways. All restoration costs shall be borne by the Customer or property owner, if the Customer is not the property owner.

Risk Mitigation Measures

All customers and property owners with an LSLR will receive documentation prior to work being initiated explaining the health effects of lead and information on flushing their interior plumbing. See appendix F for this documentation. Customers will be given a pitcher-filter prior to the LSLR. Instructions on how to use the pitcher-filter are provided. If a customer cannot be contacted prior to the LSLR, a note will be placed in an area notifying the customer to collect, or have delivered, a pitcher-filter. See appendix G for this document. If the affected service line serves more than one residence, such as a multi-unit building or a non-residential unit, CWC will provide the documentation and pitcher-filter to every unit in the building.

Flushing

CWC will assist customers with the flushing of the customer's interior plumbing after an LSLR. Information on flushing is in the LSLR Information document (appendix B), which is provided to all customers that have an LSLR. A detailed description of how to flush will also be found on the CWC website. See appendix H for the link.

Sampling

CWC will be offering to collect water samples for all customers who have an LSLR. If the customer wants their water sampled, CWC will provide the customer with sampling procedures and bottles to collect one set of follow-up first draw and 5th liter tap samples. See appendix I for the LSLR sampling procedures. The sampling with be scheduled with the customer and will be collected between three to six months after completion of the LSLR. If either of the follow up samples exceed 15 ppb of lead, CWC will provide the results of both samples to residents as soon as practicable but no later than three calendar days after becoming aware of the results. If none of the follow up samples exceed 15 ppb of lead, CWC shall provide the results of the samples to residents within 30 days after receiving the results. Accompanying information from CWC includes an explanation of the effects of lead, a list of steps consumers can take to reduce exposure to lead in drinking water, contact information for CWC, and the maximum contaminant level goal and the action level for lead, as well as the definitions for these two terms. The follow-up sample results, and accompanying information will be delivered to the customer through one of the following methods – electronically, mail, phone, hand delivered, or another method approved by PADEP. See appendix J for the documentation to be provided to the customer. If the offer to follow-up sample is not accepted by the customer, no sample will be collected, and the decline of sampling will be documented.

Reimbursement

If an eligible customer chooses to use their own contractor to replace the customer-owned service line, CWC shall reimburse the customer for the replacement cost of the customer-owned lead

service line. See appendix M for the Reimbursement Form. This form will be available at the CWC Office or on the CWC Web site. Customers are to use this as a guide for determining eligibility for reimbursement, and ensuring they have the correct documentation for reimbursement. For every lead service line replaced, an LSLR Cost form will be completed. See appendix K for the LSLR Cost Form. CWC will use these completed forms to establish the reimbursement amount for the customers who choose to use their own contractors. We will reimburse the customers in a manor that is consistent with our tariff and PUC guidelines.

Financial Considerations and Funding

CWC's annual budget will include costs relating to LSLR. Budget considerations include the cost for any outreach costs, funds for customer sampling following LSLR, costs of pitchers and replacements, additional staffing, the costs of the materials, and any additional costs that may be incurred.

The cost incurred by CWC for LSLRs will be funded with a combination of commercial loans, cash from operations, and/or PennVEST loans.

Annual Reporting

When an LSLR is completed, the service address, the length of the lead removed, the pipe diameter, and the actual cost will be documented. See appendix K for this document. This information will be compiled annually for the LSLR Program Report.

Website Information, Links, and Documentation

CWC will add lead service line documentation to its website within 1 year of PUC approval. A tab will be created on the website's main page, which will link a user to a specific page about lead service lines. Appendix's A, B, F, H, and M will be made available on the website through links. These documents provide information about LSLR routine procedures, flushing, determining service line material, and the health effects associated with lead.

The website will include information about upcoming LSLR projects. Projected main replacement projects will be posted on the LSLR webpage and provide customers with specific information of when LSLR projects will occur.

A secure, online interactive map will be provided for customers to have the ability to determine if a lead service line may exist at their location. A method will be provided to allow a customer to request assistance in determining if their service line is a lead service line.

The web page will include information regarding the reimbursement requirements and instructions for customers to determine their ability for reimbursement of a previous LSLR. CWC will explore options for providing an online tool for customers to determine their eligibility for reimbursement.

Any community outreach programs or coordination efforts will be posted on the website.

REVISED LSLR PLAN
(CLEAN)

COLUMBIA WATER COMPANY LEAD SERVICE LINE REPLACEMENT PLAN

Definitions

Refer to the tariff for definitions.

1.0 – SERVICE LINE INVENTORY

Columbia Water Company ("CWC") has prepared its Service Line Inventory. It complies with the current United States Environmental Protection Agency ("USEPA") and Pennsylvania Department of Environmental Protection ("PADEP") guidelines. The Service Line Inventory will be updated at a minimum annually, or as additional information becomes available. If CWC purchases any water distribution system in the future, the Service Line Inventory will be updated to include the acquired system's information and meet the deadlines set forth by the Public Utility Commission ("PUC").

The Service Line Inventory will comply with the timing and direction of the USEPA regulations as enforced by the PADEP, inclusive of future changes to those regulations as may be amended from time to time. The Service Line Inventory for CWC identifies material types on both the company owned and customer owned sides of the service lines. It can be sorted by material type. All discovered lead components have been detailed.

CWC plans to identify, at a minimum, a cumulative average of 10.0% of the initial unknown service materials annually by means of utilizing existing records, modeling, statistical analysis, and mechanical excavation. There are no assumed service line materials in the Service Line Inventory.

See appendix L for the Service Line Inventory Legend and Instructions.

Incorporating the Inventory into the GIS System

CWC is in the process of incorporating the Service Line Inventory into its GIS system. Once the Service Line Inventory is on the GIS, the Service Line Inventory can be updated in real time.

2.0 – PLANNING AND REPLACEMENTS

Annual Projections

CWC estimates it can replace up to approximately 50 lead service lines per year, including 25 Company-owned lead service lines and 25 Customer-owned lead service lines. This projection was determined by estimating the total number of lead service lines to be less than 400. After all existing records have been inventoried, CWC will review this annual projection and adjust it as

necessary. The annual cap for customer-owned lead service line replacements ("LSLR") is 25 or $125,000, whichever is less.

Replacing Lead Service Lines in Conjunction with Old Main Replacements

These replacements will be planned. Record-reviews of old age mains within the oldest parts of the distribution system will be analyzed to determine which water mains in the distribution system should be replaced. Prior to choosing a target area, our distribution crew will review records and/or physically inspect a portion of the service lines within a proposed area to gauge the likelihood of lead within that area. Coordination with municipalities will take place to minimize costs and minimize impacts on roads and neighborhoods.

Once the LSLR Project Areas are determined, the projects will be posted on the CWC website at least 6 months in advance of the work being done. Prior to the work being initiated, CWC staff will reach out to the customers to determine all service line material within the affected area, and to provide the customers with detailed information regarding the routine procedures and the potential health risks involved.

Replacing Lead Service Lines Discovered by Mechanical Excavation

Areas with a higher likelihood of having lead service lines will be prioritized for these projects. CWC will physically excavate the service lines to determine material types. If a service line is determined to be lead, coordination will occur with the customer(s) and the property owner to have the service line replaced.

Replacing Customer-Owned Lead Service Lines Discovered Inside the Building

CWC will reach out to the customers with lead or unknown service lines. These customers will receive documentation describing the health effects related to lead. See appendix A for this information. They will be provided with information explaining how to determine their own service line material and what to do if they believe their service line material is lead; See appendix B for related documentation. CWC staff will be checking and documenting service line material in conjunction with meter changes. Customers who discover a lead service line may call and schedule to have their service line replaced. CWC will schedule to replace customer-owned lead service lines in accordance with the tariff. If the company side is lead, it will be replaced at the same time with the customer side. These replacements will occur as discovered.

Emergency Replacements

If a lead service line is leaking or otherwise defective at the time it is discovered, CWC will replace the lead service line in accordance with the tariff. The distribution staff will maintain the proper equipment and tools necessary for emergency service line replacements. If a lead service line is discovered during an emergency but isn't leaking, the replacement of the line will be scheduled for replacement at a later date.

Prioritization of Lead Service Line Replacements

Determination of LSLR projects will be prioritized based on targeted sensitive populations as defined by the USEPA and PADEP, which includes areas with elevated levels of lead in tap water, areas with high concentrations of lead service lines, and/or areas of the distribution system which have elevated corrosion rates. These areas are more specifically found on houses built prior to 1950 with water mains older than 1970 within Columbia Borough or Marietta Borough.

A list of sensitive populations has also been developed to determine the service line materials. The list includes schools, nursing homes, large apartment buildings, churches, and industries. These service lines have been or will be detailed as sensitive populations in the Service Line Inventory. Homes with multiple meters and multiple family residents will also be prioritized to determine service line material.

Disposal of Lead

Lead removed from any project will be disposed of at an appropriate facility to ensure proper disposal of all lead. Scrap receipts will be kept on file. The proceeds from the recycling efforts will be added to our operating revenue. The customer will not have any right to the proceeds of a recycled lead service line.

Coordination with the Property Owner and Customer(s)

When a lead service line is discovered at a property, CWC will contact the customer(s) and property owner to let them know of the discovery. Customers will be given information explaining the health effects of lead and what they should do to prevent lead in their water. See appendix A for the documentation.

CWC staff will then let the customer(s) and property owner know how to schedule to have their service line replaced and when the scheduled replacement is to occur.

Prior to replacing the property-owner's portion of a lead service line, an agreement between CWC and the property-owner, or representative of the property-owner, must be signed ("Property Owner Agreement"). See appendix C. These forms will be kept on file.

When the customer-owned LSL crosses one (or more than one) property to access another, the Company will attempt to obtain approval from all property owners to allow the work necessary to replace the Customer-Owned LSL and evaluate solutions available to install conforming service lines. If the Company is unable to obtain the neighboring property owner or owners' consent, and there is no other viable and economic solution (to be determined in the Company's sole discretion) such as installing conforming service lines, the Company will commence procedures to terminate service to the neighboring property owner or owners' property as set forth in the following section of this LSLR Plan.

Refusal of Lead Service Line Replacement

If a customer or property owner refuses to grant permission to CWC to replace the lead service line or refuses to have it replaced, Columbia Water will (1) provide the customer and property owner, if the customer is not the property owner, with a complete disclosure of the known health hazards from the continued use of a LSL, see Appendix A of the LSLR Plan, (2) inform the customer or property owner, if the customer is not the property owner, that refusal or failure to accept will require replacement of the customer-owned LSL, at the customer or property owner's expense, within 1 year from LSLR project commencement for the customer or property owner, if the customer is not the property owner, to be eligible for reimbursement; and (3) communicate to the customer and property owner, if the customer is not the property owner, that failure to allow Columbia Water to complete the LSLR or to replace the customer-owned LSL concurrent with the replacing the Company-owned LSL will lead to termination of water service under the provisions of Columbia Water's tariff.

If the customer or property owner, if the customer is not the property owner, still refuses replacement of the customer-owned LSL, the Company will require the customer or property owner, if the customer is not the property owner, to sign a form documenting their refusal. See Appendix N of the LSLR Plan. If the customer or property owner refuses or fails to sign the refusal form, the Company will make a record of and document the customer's refusal.

The Company will then schedule to replace its portion of the Company-owned LSL and notify the customer in writing of the partial LSLR no later than ten days prior to the scheduled replacement and terminate water service at that location the day prior to replacing the Company-owned LSL. Columbia Water will not connect an Applicant to water service where a property owner previously refused or failed to accept the utility's offer of a LSLR until the Applicant verifies that the replacement of a customer-owned LSL by providing a paid invoice from a licensed contractor or notarized statement from a licensed contractor attesting to completion of the LSLR.

Non-Owner Occupied Premises

The Company may stand in the shoes of the property owner and is authorized to replace a Customer-Owned LSL when (1) the Company has offered to replace at no direct cost to the property owner a Customer-Owned LSL, (2) the property is not occupied by the legal owner of the property, and (3) the Company has made attempts to obtain authorization for the Customer LSLR pursuant to this Tariff and the LSLR Plan and (a) the legal owner cannot be identified, (b) the legal owner cannot be located, or (c) the Company has notified the legal owner but the owner has never responded.

In such instances, and when, in the sole discretion of the Company, replacing the customer-owned LSL and preventing the termination of water service would be reasonable and in the public interest, the Company may proceed to make the replacement without obtaining authorization from the property owner. In any such instance of replacement, the Company, and any person associated with the Company, including but not limited to employees, agents, board members and executives, are released and held harmless from any and all claims, causes of action, damages or losses, of any

nature, whatsoever with respect to the work performed by the Company or its contractors, and shall not be otherwise liable for any claim asserted by any person, including the property owner, as a result of the LSLR except to the extent otherwise authorized by the Company's Tariff.

If, prior to completing the LSLR, a property owner expressly, in writing, refuses to allow the replacement of the customer-owned LSL, the Company will not proceed with the replacement and will proceed with termination procedures as specified in the above section of the LSLR Plan. The Company also retains discretion to refuse to replace a customer-owned LSL in circumstances where the Company's employees or contractors may be placed in a dangerous situation in attempting to do the replacement.

Warranty

Upon completion of an LSLR by the Company or a contractor at the Company's request, a Completion-Agreement Form must be signed by the CWC and the property-owner, or representative of the property-owner. See appendix D. From the date of the Completion Agreement Form, the Company will provide a two-year warranty for materials and workmanship of the replaced customer-owned portion of the Service Line. This warranty shall cover repairs conducted by the Company or a contractor at the Company's request of the replaced customer-owned portion of the Service Line up to $2,500 per customer, including restoration of surfaces consistent with this LSLR Plan, so long as the customer allows access to the property for repairs. Only material defects and incomplete installation methods are covered by the warranty. The warranty does not cover, among other things, damage caused by natural disasters, acts of God, fires, terrorism, excavation activities, acts of sabotage, or deliberate damage. The Company shall have no liability for any damages not covered by the warranty.

LSLR Routine Procedure and Restoration

Columbia Water intends to replace LSLs using existing routes through a combination of pipe splitting and/or pipe pulling. This approach removes or displaces existing pipe while simultaneously replacing it with a new pipe and is the preferred method under normal circumstances. Columbia Water may also utilize guided boring to install new pipe along a different route or using open trench excavation to remove replace the pipe. The appropriate replacement technique will depend on a combination of many site-specific characteristics, including, but not limited to, time constraints, soil characteristics, depth to ground water or rock, depth of road foundation, condition of the service line, proximity of other utility services (e.g., electric, gas, cable, sewer, storm water), site conditions (e.g., access, parking, paving, landscaping, overhead obstructions), pipe conditions (e.g., length of pipe, pipe diameter and wall thickness, bury depth, configuration, and repair history, and conditions inside the home like a finished basement with limited access to the water meter and plumbing. All new pipe installation will be copper or plastic.

See also appendix E for the LSLR Routine Procedures. These procedures will be publicly available at the main office and on the CWC website. CWC will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations in the private home. No other restoration will be conducted for Lead Service

Line Replacements. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways. All restoration costs shall be borne by the Customer or property owner, if the Customer is not the property owner.

Risk Mitigation Measures

All customers and property owners with an LSLR will receive documentation prior to work being initiated explaining the health effects of lead and information on flushing their interior plumbing. See appendix F for this documentation. Customers will be given a pitcher-filter prior to the LSLR. Instructions on how to use the pitcher-filter are provided. If a customer cannot be contacted prior to the LSLR, a note will be placed in an area notifying the customer to collect, or have delivered, a pitcher-filter. See appendix G for this document. If the affected service line serves more than one residence, such as a multi-unit building or a non-residential unit, CWC will provide the documentation and pitcher-filter to every unit in the building.

Flushing

CWC will assist customers with the flushing of the customer's interior plumbing after an LSLR. Information on flushing is in the LSLR Information document (appendix B), which is provided to all customers that have an LSLR. A detailed description of how to flush will also be found on the CWC website. See appendix H for the link.

Sampling

CWC will be offering to collect water samples for all customers who have an LSLR. If the customer wants their water sampled, CWC will provide the customer with sampling procedures and bottles to collect one set of follow-up first draw and 5th liter tap samples. See appendix I for the LSLR sampling procedures. The sampling with be scheduled with the customer and will be collected between three to six months after completion of the LSLR. If either of the follow up samples exceed 15 ppb of lead, CWC will provide the results of both samples to residents as soon as practicable but no later than three calendar days after becoming aware of the results. If none of the follow up samples exceed 15 ppb of lead, CWC shall provide the results of the samples to residents within 30 days after receiving the results. Accompanying information from CWC includes an explanation of the effects of lead, a list of steps consumers can take to reduce exposure to lead in drinking water, contact information for CWC, and the maximum contaminant level goal and the action level for lead, as well as the definitions for these two terms. The follow-up sample results, and accompanying information will be delivered to the customer through one of the following methods – electronically, mail, phone, hand delivered, or another method approved by PADEP. See appendix J for the documentation to be provided to the customer. If the offer to follow-up sample is not accepted by the customer, no sample will be collected, and the decline of sampling will be documented.

Reimbursement

If an eligible customer chooses to use their own contractor to replace the customer-owned service line, CWC shall reimburse the customer for the replacement cost of the customer-owned lead

service line. See appendix M for the Reimbursement Form. This form will be available at the CWC Office or on the CWC Web site. Customers are to use this as a guide for determining eligibility for reimbursement, and ensuring they have the correct documentation for reimbursement. For every lead service line replaced, an LSLR Cost form will be completed. See appendix K for the LSLR Cost Form. CWC will use these completed forms to establish the reimbursement amount for the customers who choose to use their own contractors. We will reimburse the customers in a manor that is consistent with our tariff and PUC guidelines.

Financial Considerations and Funding

CWC's annual budget will include costs relating to LSLR. Budget considerations include the cost for any outreach costs, funds for customer sampling following LSLR, costs of pitchers and replacements, additional staffing, the costs of the materials, and any additional costs that may be incurred.

The cost incurred by CWC for LSLRs will be funded with a combination of commercial loans, cash from operations, and/or PennVEST loans.

Annual Reporting

When an LSLR is completed, the service address, the length of the lead removed, the pipe diameter, and the actual cost will be documented. See appendix K for this document. This information will be compiled annually for the LSLR Program Report.

Website Information, Links, and Documentation

CWC will add lead service line documentation to its website within 1 year of PUC approval. A tab will be created on the website's main page, which will link a user to a specific page about lead service lines. Appendix's A, B, F, H, and M will be made available on the website through links. These documents provide information about LSLR routine procedures, flushing, determining service line material, and the health effects associated with lead.

The website will include information about upcoming LSLR projects. Projected main replacement projects will be posted on the LSLR webpage and provide customers with specific information of when LSLR projects will occur.

A secure, online interactive map will be provided for customers to have the ability to determine if a lead service line may exist at their location. A method will be provided to allow a customer to request assistance in determining if their service line is a lead service line.

The web page will include information regarding the reimbursement requirements and instructions for customers to determine their ability for reimbursement of a previous LSLR. CWC will explore options for providing an online tool for customers to determine their eligibility for reimbursement.

Any community outreach programs or coordination efforts will be posted on the website.

REVISED PRO FORMA TARIFF SUPPLEMENT (REDLINE)

COLUMBIA WATER COMPANY

RATES, RULES, AND REGULATIONS GOVERNING
THE DISTRIBUTION OF WATER IN WEST HEMPFIELD, RAPHO,
EAST DONEGAL AND MANOR TOWNSHIPS AND
THE BOROUGHS OF COLUMBIA AND MOUNTVILLE, AND MARIETTA
LANCASTER COUNTY AND HELLAM TOWNSHIP, YORK COUNTY, PENNSYLVANIA

Issued: _____, 202X Effective: _____, 202X

By: David T. Lewis, President
Columbia Water Company
220 Locust Street
Columbia, PA 17512

NOTICE

THIS TARIFF SUPPLEMENT IMPLEMENTS THE COMPANY'S LEAD SERVICE LINE REPLACEMENT PROGRAM.

See Page Two

List of Changes Made by this Supplement

Change:

Tariff Supplement No. XXX implements the Company's Lead Service Line Replacement Program, which addresses the Company's efforts to replace company-owned and customer-owned Lead Service Lines. (C)

(C) Indicates Change

.Table of Contents

(I) Indicates Increase (D) Indicates Decrease (C) Indicates Change

28. Lead Service Line (LSLR) Program (C)

(1) Supersession

This section of the Company's Tariff supersedes all other conflicting provisions of this Tariff for purposes of implementing the Company's Lead Service Line Replacement Program.

(2) Definitions

Curb Stop: A water service shutoff valve located in a water service line near the curb or edge of the street and between the water main and the building.

Company-Owned LSL – Company-Owned Lead Service Line: The portion of the lead service line extending from the Company's main to the Curb Stop.

Customer-Owned LSL – Customer-Owned Lead Service Line: The portion of the lead service line extending from the Curb Stop to the meter or one foot inside a building foundation, whichever is farther.

Galvanized Service Line: Iron or steel piping that has been dipped in zinc to prevent corrosion and rusting.

Company: Columbia Water Company.

Customer: A person or entity who is an owner or occupant and who contracts with the Company for water service.

Independent Legal Restrictions: Commission Regulations or Orders which otherwise prevent termination of water service at a property including but not limited to winter moratorium, medical certifications, or Commission directed moratoriums or suspensions.

LSL - Lead Service Line: A service line made of lead that connects the water main to a building inlet and a lead pigtail, gooseneck or other fitting that is connected to the lead line. A galvanized service line is considered a lead service line if it ever was or is currently downstream of any lead service line or service line of unknown material.

LSLR – Lead Service Line Replacement: A service line, whether Company-owned or customer-owned, installed to replace a lead service line.

LSLR Plan – Lead Service Line Replacement Plan: A plan and supporting documents submitted to and approved by the Commission that specify how the Company intends to implement its lead service line replacement program.

LSLR Project – Lead Service Line Replacement Project: A Company-scheduled lead service line replacement activity either in conjunction with main replacements or as part of a lead service line replacement plan.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(C)

(2) Definitions (Cont'd)

LSLR Project Area – Lead Service Line Replacement Project Area: The area encompassing a Company's scheduled lead service line replacement activities, which includes the area within a 1-mile radius of a lead service line replacement project if served by the Company.

LSLR Project Commencement – Lead Service Line Replacement Project Commencement: Installation of the first lead service line replacement within a lead service line replacement project area.

Partial LSLR – Partial Lead Service Line Replacement: A lead service line replacement that does not replace both the Company-owned and customer-owned portions of a lead service line.

Property Owner Agreement: An agreement between the Company and a property owner for the replacement of a Customer-Owned LSL that allows the Company's employees and contractors to gain access to their private property in order to replace their customer-owned LSL prior to the initiation of any work by the Company to replace the customer-owned LSL

Service Line: The pipe and appurtenances which connect any main to the Company's water meter or, if the Company's water meter is located outside of the structure or the connection is not metered by the Company, at the first shutoff valve located within the interior of the structure.

Service Line Inventory: The process of identifying each service line under the timing and direction of United States Environmental Protection Agency regulation at 40 CFR 141.1—143.20 as enforced by the Department of Environmental Protection, inclusive of future changes as those regulations may be amended.

Water Distribution System: The equipment and facilities owned or operated by the Company for diverting, developing, pumping, impounding, distributing or furnishing water to or for the public for compensation.

(3) LSLR Plan

Notwithstanding Rules in this Tariff relating to customer responsibility for customer service lines, the Company will replace Customer-Owned LSLs pursuant to its LSLR Plan (as approved at Docket No. P-2023-_____) and set forth in Section 9.0 to the Company's 5-Year Long-Term Infrastructure Improvement Plan approved at Docket No P-2023-_____, subject to an annual cap described below. The Company may modify its annual cap for Lead Service Line Replacements with Commission approval. The costs incurred by the Company to undertake remediation efforts pursuant to its Lead Service Line Replacement Plan shall be recoverable in the Company's Distribution System Improvement Charge, PENNVEST Surcharge, and in base rates, as applicable.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(C)

(3) LSLR Plan (Cont'd)

The Company's Lead Service Line Replacement Plan is in effect until September 2028 and applies to any Lead Service Line (1) serving any customers of Columbia Water Company; (2) of which the Company is aware; (3) the replacement of which is operationally feasible; and (4) the Property Owner authorizes the replacement or replaces the line in accordance with Company policy or, the Company is otherwise authorized to replace the line in accordance with this Tariff.

(4) LSLR Annual Cap

The Company will cap LSLR Projects at ~~50~~25 Customer-Owned LSLRs or $~~250~~125,000, whichever is less, on an annual basis. If a Customer reimbursement provided pursuant to this Tariff or an emergency LSLR causes Columbia Water to exceed its annual cap, Columbia Water will increase its current annual cap by the number and cost of emergency repairs and/or reimbursements and decrease its annual cap by same for the following year only.

(5) LSLR Replacements

The Company will offer to replace Customer-Owned LSLs at no direct cost to the Customer or property owner, if the Customer is not the property owner: (i) at any residential or non-residential property where the Company replaces a Company-owned main connected to a Customer-Owned LSL; (ii) at any property where the Company replaces a Company-Owned LSL connected to a Customer-Owned LSL; and (iii) at any property with a private-side only LSL located within a LSLR Project Area where LSLRs are performed; and (iv) when the Company's operations crew replaces a Company-owned facility regardless of material, in emergencies, including line breaks, leaks, or other unplanned emergency replacements, that is or is connected to a LSL.

Except in the case of non-owner occupied properties at which the Company has exercised "stand in the shoes" rights, the Company shall enter into a Property Owner Agreement with the property owner for replacement of a Customer-Owned LSL that allows the Company's employees and contractors to gain access to their private property in order to replace their customer-owned LSL prior to the initiation of any work by the Company to replace the customer-owned LSL. The Property Owner Agreement shall be in a form provided by the Company and shall include provisions that require the Property Owner(s) to release and hold harmless the Company from any and all claims, causes of action, damages or losses, of any nature, whatsoever with respect to the work performed by the Company or its contractors.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd) (C)

(6) Customer Refusal

Except as set forth below, if after being notified of the Company's offer to replace at no cost a Customer-Owned LSL, the property owner has not provided an executed Property Owner Agreement authorizing the replacement of the customer service line or has refused replacement, the Company will (1) provide the Customer and property owner, if the Customer is not the property owner, with a complete disclosure of the known health hazards from the continued use of a LSL, (2) inform the Customer or property owner, if the Customer is not the property owner, that refusal or failure to accept will require replacement of the Customer-Owned LSL, at the Customer or property owner's expense, within 1 year from LSLR Project commencement for the Customer or property owner, if the Customer is not the property owner, to be eligible for reimbursement and (3) communicate to the Customer and property owner, if the Customer is not the property owner, that failure to allow Columbia Water to complete the LSLR or to replace the Customer-Owned LSL concurrent with the replacing the Company-Owned LSL will lead to termination of water service prior to the Company replacing the Company-Owned LSL.

If the Customer or property owner, if the Customer is not the property owner, does not sign the Property Owner Agreement or still refuses replacement of the Customer-Owned LSL within ten days after Columbia undertakes the aforementioned steps, the Company will require the Customer or property owner, if the Customer is not the property owner, to sign a form documenting their refusal. If the Customer or property owner refuses or fails to sign the refusal form, the Company will make a record of and document the customer's refusal. The Company will then schedule to replace its portion of the Company-Owned LSL and notify the customer in writing of the partial LSLR no later than ten days prior to the scheduled replacement and terminate water service at that location the day prior to replacing the Company-Owned LSL. The Company will proceed with termination of water service to a location irrespective of whether Independent Legal Restrictions would otherwise delay or prohibit termination. Such notice and termination shall be deemed consistent with Chapter 14 of the Public Utility Code. Moreover, in these instances, the Company is not required to comply with termination procedures described in other portions of its tariff or the Commission's regulations.

At any time prior to completing termination, or, within ten days after termination, the property owner executes the Property Owner Agreement, water service will be restored to the property, provided that service will not be restored until either both the Company-Owned LSL and the Customer-Owned LSL have been replaced or, in the Company's sole discretion, an alternative, non-lead temporary bypass is installed.

Columbia Water will not connect an Applicant to water service where a property owner previously refused or failed to accept the utility's offer of a LSLR until the Applicant verifies that the replacement of a Customer-Owned LSL by providing a paid invoice from a licensed contractor or notarized statement from a licensed contractor attesting to completion of the LSLR.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(C)

(7) Customer Lead Service Line on Multiple Properties

When the Company is undertaking an LSLR Project and the Customer-Owned LSL crosses one (or more than one) property to access another, the Company will attempt to obtain approval from all property owners to allow the work necessary to replace the Customer-Owned LSL and evaluate solutions available to install conforming service lines.

If the Company is unable to obtain the neighboring property owner or owners' consent, and there is no other viable and economic solution (to be determined in the Company's sole discretion) such as installing conforming service lines, the Company will commence procedures to terminate service to the neighboring property owner or owners' property. The Company will complete or suspend the termination of the neighboring property owner's water service as set forth in section (6) above.

(8) Non-Owner Occupied Properties

The Company may stand in the shoes of the property owner and is authorized to replace a Customer-Owned LSL when:

i. The Company has offered pursuant to its Tariff to replace at no direct cost to the property owner a Customer-Owned LSL;

ii. The property is not occupied by the legal owner of the property; and

iii. The Company has made attempts to obtain authorization for the Customer LSLR pursuant to this Tariff and the LSLR Plan and (a) the legal owner cannot be identified; (b) the legal owner cannot be located; or (c) the Company has notified the legal owner but the owner has never responded.

In such instances, and when, in the sole discretion of the Company, replacing the Customer-Owned LSL and preventing the termination of water service would be reasonable and in the public interest, the Company may provide the Customer with the option to execute a consent form for the LSL replacement and, upon execution of the Customer consent form, is authorized by this Tariff, which has the force and effect of law, to proceed to make the replacement without obtaining authorization from the property owner. The Company's replacement in this circumstance without the property owner's consent is in furtherance of the Company's duty pursuant to the Public Utility Code to provide safe and reasonable service and shall not constitute a violation of law or constitute any tort or other criminal or civil liability.

In any such instance of replacement, the Company, and any person associated with the Company, including but not limited to employees, agents, board members and executives, are released and held harmless from any and all claims, causes of action, damages or losses, of any nature, whatsoever with respect to the work performed by the Company or its contractors, and shall not be otherwise liable for any claim asserted by any person, including the property owner, as a result of the LSLR.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(C)

(8) Non-Owner Occupied Properties (Cont'd)

If a property owner expressly, in writing, refuses to allow the replacement of the Customer-Owned LSL, the Company will not proceed with the replacement and will proceed with termination procedures as specified in section (6) above. The Company also retains discretion to refuse to replace a Customer-Owned LSL in circumstances where the Company's employees or contractors may be placed in a dangerous situation in attempting to do the replacement.

(~~7~~9) Service Line Demarcation

If a shutoff valve is not located within 12 inches of the structure wall of the property, the Company may install a shutoff valve during the LSLR to serve as a point of demarcation between the property's service line and the property's interior water distribution piping.

The Company shall perfect its ownership of the portion of the service line located within the then-existing right-of-way in conformance with its Tariff to ensure that the Company can obtain necessary permits during the planning phase of a LSLR Project

(~~8~~10) Prohibition on Partial LSLRs and Notice Requirements

Neither a Customer nor a property owner may install a Partial LSLR. A Partial LSLR installed after July 23, 2022, shall result in immediate termination of service until both the Company-Owned LSL and Customer-Owned LSL have been replaced. The Company will proceed with immediate termination of water service to a location being served by a partial LSLR installed after July 23, 2022, irrespective of whether Independent Legal Restrictions would otherwise delay or prohibit termination. Such termination shall be deemed consistent with Chapter 14 of the Public Utility Code. Moreover, in these instances, the Company is not required to comply with termination procedures described in other portions of its tariff or the Commission's regulations.

Where a Customer or a property owner, if the Customer is not the property owner, elects to replace the Customer-Owned LSL, the Customer or property owner shall replace the Customer-Owned LSL concurrent with the Company replacing the Company-Owned LSL, provided that the Customer or property owner, if the Customer is not the property owner, shall provide the Company at least 90 days' notice prior to replacing the Customer-Owned LSL.

The Company shall not connect an Applicant for water service to the Company-Owned service line at a property where a Customer or property owner, if the Customer is not the property owner, previously refused or failed to accept the Company's offer of a LSLR until the Applicant verifies the replacement of the Customer-Owned LSL by providing a paid invoice from a licensed contractor or a verified statement from a licensed contractor attesting to completion of the LSLR.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(C)

(~~9~~11) Reimbursement

Where a Customer or property owner, if the Customer is not the property owner, has replaced its own Customer-Owned LSL, the Customer or property owner shall submit to the Company a reimbursement form located on the Company's website by mail, e-mail, fax, or hand delivery, which contains, at a minimum, a detailed estimate and paid invoice from a licensed contractor verifying the replacement of the Customer-Owned LSL. Instead of a detailed estimate, a verified statement from the contractor attesting to completion of a LSLR may be sufficient in the Company's discretion. A paid invoice must be submitted.

Upon submission of the reimbursement form, the Company will review the information that was provided within ninety days of receiving the reimbursement form to determine eligibility for a reimbursement. If sufficient information has not been provided at the time of submitting the reimbursement form, the Company will contact the Customer or property owner to request the necessary information to determine eligibility. The Company will have an additional forty-five days from the time it receives the additional information to determine a customer's eligibility for reimbursement.

A Customer or property owner, if the Customer is not the property owner, is eligible to receive a reimbursement if the Customer or property owner is located within a LSLR Project Area and replaced the Customer-Owned LSL within one year of LSLR Project Commencement. A Customer or property owner, if the Customer is not the property owner, located within a LSLR Project Area is eligible for a reimbursement of LSLR expenses up to 125% of the average cost over the last twelve months, on a rolling basis, the Company would have incurred to perform the replacement of a similarly-sized service line, not to exceed the actual cost to the Customer or property owner.

Reimbursements will be paid directly to the Customer or property owner, if the Customer is not the property owner, through the issuance of a check. The Company will issue a check within ninety days after verifying that the Customer or property owner is eligible for reimbursement.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(C)

(~~10~~12) Warranty

For Customer-Owned LSLs replaced directly by the Company or by a contractor at the Company's request, the Company will provide a two-year warranty for materials and workmanship of the replaced customer-owned portion of the Service Line commencing from the date the LSLR is complete. This warranty shall cover repairs conducted by the Company or a contractor at the Company's request of the replaced customer-owned portion of the Service Line up to $2,500 per customer, including restoration of surfaces consistent with this Tariff, so long as the customer allows access to the property for repairs.

Only material defects and incomplete installation methods are covered by the warranty. The warranty does not cover, among other things, damage caused by natural disasters, acts of God, fires, terrorism, excavation activities, acts of sabotage, or deliberate damage. The Company shall have no liability for any damages not covered by the warranty.

(~~11~~13) Limitation of Liability

The Company's liability relating to Lead Service Line Replacement efforts is limited as set forth in Rule 15 of this Tariff.

(~~12~~14) Restoration

The Company will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations in the private home. No other restoration will be conducted for Lead Service Line Replacements. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways. All restoration costs shall be borne by the Customer or property owner, if the Customer is not the property owner.

(~~13~~15) Ownership and Responsibility for Replacement Line

After a Customer-Owned LSL is replaced by the Company, the Customer shall continue to own the customer portion of the Service Line and shall have full responsibility for the repair, replacement and maintenance of the new customer portion of the Service Line.

(C) Indicates Change

REVISED PRO FORMA TARIFF SUPPLEMENT (CLEAN)

COLUMBIA WATER COMPANY

RATES, RULES, AND REGULATIONS GOVERNING
THE DISTRIBUTION OF WATER IN WEST HEMPFIELD, RAPHO,
EAST DONEGAL AND MANOR TOWNSHIPS AND
THE BOROUGHS OF COLUMBIA AND MOUNTVILLE, AND MARIETTA
LANCASTER COUNTY AND HELLAM TOWNSHIP, YORK COUNTY, PENNSYLVANIA

Issued: _____, 202X Effective: _____, 202X

By: David T. Lewis, President
Columbia Water Company
220 Locust Street
Columbia, PA 17512

NOTICE

THIS TARIFF SUPPLEMENT IMPLEMENTS THE COMPANY'S LEAD SERVICE LINE REPLACEMENT PROGRAM.

See Page Two

List of Changes Made by this Supplement

Change:

Tariff Supplement No. XXX implements the Company's Lead Service Line Replacement Program, which addresses the Company's efforts to replace company-owned and customer-owned Lead Service Lines. (C)

(C) Indicates Change

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(I) Indicates Increase (D) Indicates Decrease (C) Indicates Change

28. Lead Service Line (LSLR) Program (C)

(1) Supersession

This section of the Company's Tariff supersedes all other conflicting provisions of this Tariff for purposes of implementing the Company's Lead Service Line Replacement Program.

(2) Definitions

Curb Stop: A water service shutoff valve located in a water service line near the curb or edge of the street and between the water main and the building.

Company-Owned LSL – Company-Owned Lead Service Line: The portion of the lead service line extending from the Company's main to the Curb Stop.

Customer-Owned LSL – Customer-Owned Lead Service Line: The portion of the lead service line extending from the Curb Stop to the meter or one foot inside a building foundation, whichever is farther.

Galvanized Service Line: Iron or steel piping that has been dipped in zinc to prevent corrosion and rusting.

Company: Columbia Water Company.

Customer: A person or entity who is an owner or occupant and who contracts with the Company for water service.

Independent Legal Restrictions: Commission Regulations or Orders which otherwise prevent termination of water service at a property including but not limited to winter moratorium, medical certifications, or Commission directed moratoriums or suspensions.

LSL - Lead Service Line: A service line made of lead that connects the water main to a building inlet and a lead pigtail, gooseneck or other fitting that is connected to the lead line. A galvanized service line is considered a lead service line if it ever was or is currently downstream of any lead service line or service line of unknown material.

LSLR – Lead Service Line Replacement: A service line, whether Company-owned or customer-owned, installed to replace a lead service line.

LSLR Plan – Lead Service Line Replacement Plan: A plan and supporting documents submitted to and approved by the Commission that specify how the Company intends to implement its lead service line replacement program.

LSLR Project – Lead Service Line Replacement Project: A Company-scheduled lead service line replacement activity either in conjunction with main replacements or as part of a lead service line replacement plan.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(C)

(2) Definitions (Cont'd)

LSLR Project Area – Lead Service Line Replacement Project Area: The area encompassing a Company's scheduled lead service line replacement activities, which includes the area within a 1-mile radius of a lead service line replacement project if served by the Company.

LSLR Project Commencement – Lead Service Line Replacement Project Commencement: Installation of the first lead service line replacement within a lead service line replacement project area.

Partial LSLR – Partial Lead Service Line Replacement: A lead service line replacement that does not replace both the Company-owned and customer-owned portions of a lead service line.

Property Owner Agreement: An agreement between the Company and a property owner for the replacement of a Customer-Owned LSL that allows the Company's employees and contractors to gain access to their private property in order to replace their customer-owned LSL prior to the initiation of any work by the Company to replace the customer-owned LSL

Service Line: The pipe and appurtenances which connect any main to the Company's water meter or, if the Company's water meter is located outside of the structure or the connection is not metered by the Company, at the first shutoff valve located within the interior of the structure.

Service Line Inventory: The process of identifying each service line under the timing and direction of United States Environmental Protection Agency regulation at 40 CFR 141.1—143.20 as enforced by the Department of Environmental Protection, inclusive of future changes as those regulations may be amended.

Water Distribution System: The equipment and facilities owned or operated by the Company for diverting, developing, pumping, impounding, distributing or furnishing water to or for the public for compensation.

(3) LSLR Plan

Notwithstanding Rules in this Tariff relating to customer responsibility for customer service lines, the Company will replace Customer-Owned LSLs pursuant to its LSLR Plan (as approved at Docket No. P-2023-_____) and set forth in Section 9.0 to the Company's 5-Year Long-Term Infrastructure Improvement Plan approved at Docket No P-2023-_____, subject to an annual cap described below. The Company may modify its annual cap for Lead Service Line Replacements with Commission approval. The costs incurred by the Company to undertake remediation efforts pursuant to its Lead Service Line Replacement Plan shall be recoverable in the Company's Distribution System Improvement Charge, PENNVEST Surcharge, and in base rates, as applicable.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd) (C)

(3) LSLR Plan (Cont'd)

The Company's Lead Service Line Replacement Plan is in effect until September 2028 and applies to any Lead Service Line (1) serving any customers of Columbia Water Company; (2) of which the Company is aware; (3) the replacement of which is operationally feasible; and (4) the Property Owner authorizes the replacement or replaces the line in accordance with Company policy or, the Company is otherwise authorized to replace the line in accordance with this Tariff.

(4) LSLR Annual Cap

The Company will cap LSLR Projects at 25 Customer-Owned LSLRs or $125,000, whichever is less, on an annual basis. If a Customer reimbursement provided pursuant to this Tariff or an emergency LSLR causes Columbia Water to exceed its annual cap, Columbia Water will increase its current annual cap by the number and cost of emergency repairs and/or reimbursements and decrease its annual cap by same for the following year only.

(5) LSLR Replacements

The Company will offer to replace Customer-Owned LSLs at no direct cost to the Customer or property owner, if the Customer is not the property owner: (i) at any residential or non-residential property where the Company replaces a Company-owned main connected to a Customer-Owned LSL; (ii) at any property where the Company replaces a Company-Owned LSL connected to a Customer-Owned LSL; and (iii) at any property with a private-side only LSL located within a LSLR Project Area where LSLRs are performed; and (iv) when the Company's operations crew replaces a Company-owned facility regardless of material, in emergencies, including line breaks, leaks, or other unplanned emergency replacements, that is or is connected to a LSL.

Except in the case of non-owner occupied properties at which the Company has exercised "stand in the shoes" rights, the Company shall enter into a Property Owner Agreement with the property owner for replacement of a Customer-Owned LSL that allows the Company's employees and contractors to gain access to their private property in order to replace their customer-owned LSL prior to the initiation of any work by the Company to replace the customer-owned LSL. The Property Owner Agreement shall be in a form provided by the Company and shall include provisions that require the Property Owner(s) to release and hold harmless the Company from any and all claims, causes of action, damages or losses, of any nature, whatsoever with respect to the work performed by the Company or its contractors.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd) (C)

(6) Customer Refusal

Except as set forth below, if after being notified of the Company's offer to replace at no cost a Customer-Owned LSL, the property owner has not provided an executed Property Owner Agreement authorizing the replacement of the customer service line or has refused replacement, the Company will (1) provide the Customer and property owner, if the Customer is not the property owner, with a complete disclosure of the known health hazards from the continued use of a LSL, (2) inform the Customer or property owner, if the Customer is not the property owner, that refusal or failure to accept will require replacement of the Customer-Owned LSL, at the Customer or property owner's expense, within 1 year from LSLR Project commencement for the Customer or property owner, if the Customer is not the property owner, to be eligible for reimbursement and (3) communicate to the Customer and property owner, if the Customer is not the property owner, that failure to allow Columbia Water to complete the LSLR or to replace the Customer-Owned LSL concurrent with the replacing the Company-Owned LSL will lead to termination of water service prior to the Company replacing the Company-Owned LSL.

If the Customer or property owner, if the Customer is not the property owner, does not sign the Property Owner Agreement or still refuses replacement of the Customer-Owned LSL within ten days after Columbia undertakes the aforementioned steps, the Company will require the Customer or property owner, if the Customer is not the property owner, to sign a form documenting their refusal. If the Customer or property owner refuses or fails to sign the refusal form, the Company will make a record of and document the customer's refusal. The Company will then schedule to replace its portion of the Company-Owned LSL and notify the customer in writing of the partial LSLR no later than ten days prior to the scheduled replacement and terminate water service at that location the day prior to replacing the Company-Owned LSL. The Company will proceed with termination of water service to a location irrespective of whether Independent Legal Restrictions would otherwise delay or prohibit termination. Such notice and termination shall be deemed consistent with Chapter 14 of the Public Utility Code. Moreover, in these instances, the Company is not required to comply with termination procedures described in other portions of its tariff or the Commission's regulations.

At any time prior to completing termination, or, within ten days after termination, the property owner executes the Property Owner Agreement, water service will be restored to the property, provided that service will not be restored until either both the Company-Owned LSL and the Customer-Owned LSL have been replaced or, in the Company's sole discretion, an alternative, non-lead temporary bypass is installed.

Columbia Water will not connect an Applicant to water service where a property owner previously refused or failed to accept the utility's offer of a LSLR until the Applicant verifies that the replacement of a Customer-Owned LSL by providing a paid invoice from a licensed contractor or notarized statement from a licensed contractor attesting to completion of the LSLR.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(C)

(7) Customer Lead Service Line on Multiple Properties

When the Company is undertaking an LSLR Project and the Customer-Owned LSL crosses one (or more than one) property to access another, the Company will attempt to obtain approval from all property owners to allow the work necessary to replace the Customer-Owned LSL and evaluate solutions available to install conforming service lines.

If the Company is unable to obtain the neighboring property owner or owners' consent, and there is no other viable and economic solution (to be determined in the Company's sole discretion) such as installing conforming service lines, the Company will commence procedures to terminate service to the neighboring property owner or owners' property. The Company will complete or suspend the termination of the neighboring property owner's water service as set forth in section (6) above.

(8) Non-Owner Occupied Properties

The Company may stand in the shoes of the property owner and is authorized to replace a Customer-Owned LSL when:

i. The Company has offered pursuant to its Tariff to replace at no direct cost to the property owner a Customer-Owned LSL;

ii. The property is not occupied by the legal owner of the property; and

iii. The Company has made attempts to obtain authorization for the Customer LSLR pursuant to this Tariff and the LSLR Plan and (a) the legal owner cannot be identified; (b) the legal owner cannot be located; or (c) the Company has notified the legal owner but the owner has never responded.

In such instances, and when, in the sole discretion of the Company, replacing the Customer-Owned LSL and preventing the termination of water service would be reasonable and in the public interest, the Company may provide the Customer with the option to execute a consent form for the LSL replacement and, upon execution of the Customer consent form, is authorized by this Tariff, which has the force and effect of law, to proceed to make the replacement without obtaining authorization from the property owner. The Company's replacement in this circumstance without the property owner's consent is in furtherance of the Company's duty pursuant to the Public Utility Code to provide safe and reasonable service and shall not constitute a violation of law or constitute any tort or other criminal or civil liability.

In any such instance of replacement, the Company, and any person associated with the Company, including but not limited to employees, agents, board members and executives, are released and held harmless from any and all claims, causes of action, damages or losses, of any nature, whatsoever with respect to the work performed by the Company or its contractors, and shall not be otherwise liable for any claim asserted by any person, including the property owner, as a result of the LSLR.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(C)

(8) Non-Owner Occupied Properties (Cont'd)

If a property owner expressly, in writing, refuses to allow the replacement of the Customer-Owned LSL, the Company will not proceed with the replacement and will proceed with termination procedures as specified in section (6) above. The Company also retains discretion to refuse to replace a Customer-Owned LSL in circumstances where the Company's employees or contractors may be placed in a dangerous situation in attempting to do the replacement.

(9) Service Line Demarcation

If a shutoff valve is not located within 12 inches of the structure wall of the property, the Company may install a shutoff valve during the LSLR to serve as a point of demarcation between the property's service line and the property's interior water distribution piping.

The Company shall perfect its ownership of the portion of the service line located within the then-existing right-of-way in conformance with its Tariff to ensure that the Company can obtain necessary permits during the planning phase of a LSLR Project

(10) Prohibition on Partial LSLRs and Notice Requirements

Neither a Customer nor a property owner may install a Partial LSLR. A Partial LSLR installed after July 23, 2022, shall result in immediate termination of service until both the Company-Owned LSL and Customer-Owned LSL have been replaced. The Company will proceed with immediate termination of water service to a location being served by a partial LSLR installed after July 23, 2022, irrespective of whether Independent Legal Restrictions would otherwise delay or prohibit termination. Such termination shall be deemed consistent with Chapter 14 of the Public Utility Code. Moreover, in these instances, the Company is not required to comply with termination procedures described in other portions of its tariff or the Commission's regulations.

Where a Customer or a property owner, if the Customer is not the property owner, elects to replace the Customer-Owned LSL, the Customer or property owner shall replace the Customer-Owned LSL concurrent with the Company replacing the Company-Owned LSL, provided that the Customer or property owner, if the Customer is not the property owner, shall provide the Company at least 90 days' notice prior to replacing the Customer-Owned LSL.

The Company shall not connect an Applicant for water service to the Company-Owned service line at a property where a Customer or property owner, if the Customer is not the property owner, previously refused or failed to accept the Company's offer of a LSLR until the Applicant verifies the replacement of the Customer-Owned LSL by providing a paid invoice from a licensed contractor or a verified statement from a licensed contractor attesting to completion of the LSLR.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(C)

(11) Reimbursement

Where a Customer or property owner, if the Customer is not the property owner, has replaced its own Customer-Owned LSL, the Customer or property owner shall submit to the Company a reimbursement form located on the Company's website by mail, e-mail, fax, or hand delivery, which contains, at a minimum, a detailed estimate and paid invoice from a licensed contractor verifying the replacement of the Customer-Owned LSL. Instead of a detailed estimate, a verified statement from the contractor attesting to completion of a LSLR may be sufficient in the Company's discretion. A paid invoice must be submitted.

Upon submission of the reimbursement form, the Company will review the information that was provided within ninety days of receiving the reimbursement form to determine eligibility for a reimbursement. If sufficient information has not been provided at the time of submitting the reimbursement form, the Company will contact the Customer or property owner to request the necessary information to determine eligibility. The Company will have an additional forty-five days from the time it receives the additional information to determine a customer's eligibility for reimbursement.

A Customer or property owner, if the Customer is not the property owner, is eligible to receive a reimbursement if the Customer or property owner is located within a LSLR Project Area and replaced the Customer-Owned LSL within one year of LSLR Project Commencement. A Customer or property owner, if the Customer is not the property owner, located within a LSLR Project Area is eligible for a reimbursement of LSLR expenses up to 125% of the average cost over the last twelve months, on a rolling basis, the Company would have incurred to perform the replacement of a similarly-sized service line, not to exceed the actual cost to the Customer or property owner.

Reimbursements will be paid directly to the Customer or property owner, if the Customer is not the property owner, through the issuance of a check. The Company will issue a check within ninety days after verifying that the Customer or property owner is eligible for reimbursement.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd) (C)

(12) Warranty

For Customer-Owned LSLs replaced directly by the Company or by a contractor at the Company's request, the Company will provide a two-year warranty for materials and workmanship of the replaced customer-owned portion of the Service Line commencing from the date the LSLR is complete. This warranty shall cover repairs conducted by the Company or a contractor at the Company's request of the replaced customer-owned portion of the Service Line up to $2,500 per customer, including restoration of surfaces consistent with this Tariff, so long as the customer allows access to the property for repairs.

Only material defects and incomplete installation methods are covered by the warranty. The warranty does not cover, among other things, damage caused by natural disasters, acts of God, fires, terrorism, excavation activities, acts of sabotage, or deliberate damage. The Company shall have no liability for any damages not covered by the warranty.

(13) Limitation of Liability

The Company's liability relating to Lead Service Line Replacement efforts is limited as set forth in Rule 15 of this Tariff.

(14) Restoration

The Company will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations in the private home. No other restoration will be conducted for Lead Service Line Replacements. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways. All restoration costs shall be borne by the Customer or property owner, if the Customer is not the property owner.

(15) Ownership and Responsibility for Replacement Line

After a Customer-Owned LSL is replaced by the Company, the Customer shall continue to own the customer portion of the Service Line and shall have full responsibility for the repair, replacement and maintenance of the new customer portion of the Service Line.

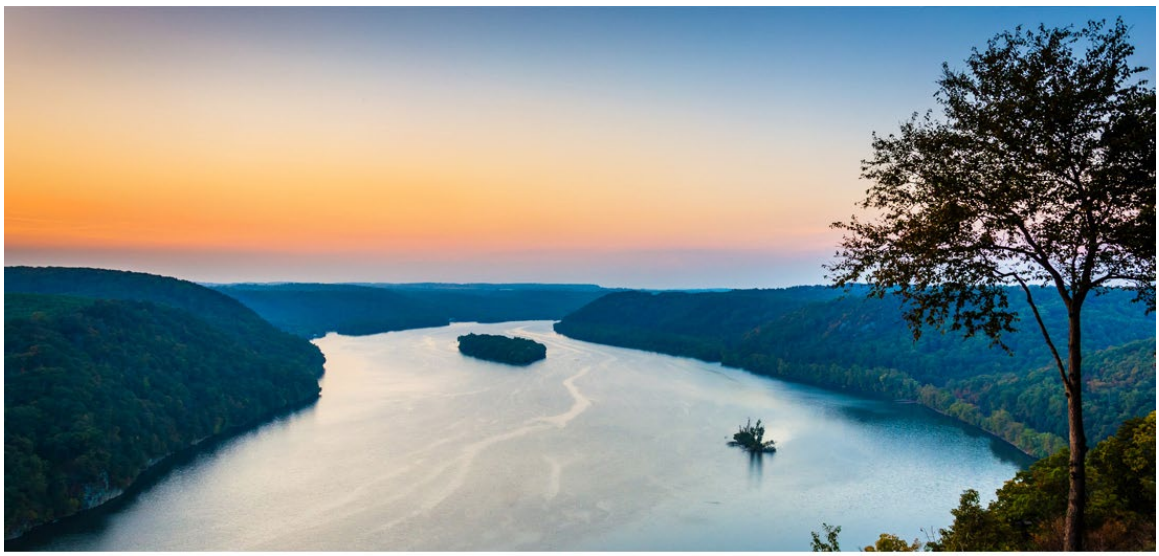
(C) Indicates Change

LSLR PROGRAM – REVISED LTIIP (REDLINE)

COLUMBIA WATER COMPANY

MODIFIED
LONG-TERM INFRASTRUCTURE IMPROVEMENT PLAN

2023-2027



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Introduction

In accordance with the requirements of 66 Pa. C.S. §§ 1350 - 1360 and the Public Utility Commission's Final Order for the Implementation of Act 11 of 2012 (Public Meeting of August 2, 2012, Docket No. M-2012-2293611), Columbia Water ~~Company~~Company's (CWC) ~~is submitting this~~ Long-Term Infrastructure Improvement Plan (LTIIP~~). CWC's LTIIP~~) addresses infrastructure investment through its long-established and cost-effective Distribution System Improvement Charge (DSIC)[1,~~2~~]~~. This LTIIP incorporates the Marietta rate district and adjusts future spending projections to account for changes in available capital and the regulatory environment.~~[2].

Since its establishment of a DSIC in April of 2003, CWC has replaced over 27,400 ~~-~~feet of pipe. This represents about 3.8% of its distribution system pipe that has been renewed through the DSIC program. In addition to pipe, CWC has replaced 940 service lines which is approximately 9% of the total service lines and 5,330 old age meters which is over 51% of the Company's meters. This has allowed CWC to continue to provide safe and reliable service to its customers. In addition, the DSIC has allowed the Company to manage infrastructure replacement costs in an effective manner by directly targeting those costs without the need for additional rate case filings, the reasonable costs of which are borne by the ratepayers.

Prior to Commission approval of the Company's last rate filing on March 1, 2018 at Docket No. R-2017-2598203, the Company operated two districts known as the Columbia District and the Marietta District. For purposes of the DSIC, the March 1, 2018 Commission Order combined the rate districts and made the Marietta Rate District DSIC eligible. Prior to the March 1, 2018 Commission Order, only the Columbia Rate District was DSIC eligible. This LTIIP is for CWC's distribution system ~~which~~that is located in the Columbia and Marietta rate districts. ~~It~~On March 31, 2022, the Company acquired East Donegal Township Municipal Authority ("East Donegal").[3] The Company operates the East Donegal Rate District as a separate, independent system. Except to the extent necessary to carry out its Lead Service Line Replacement (LSLR) Plan (LSLR Plan), as discussed below, the Company's LTIIP does not include the distribution system located in the East Donegal ~~rate district~~Rate District.

In accordance with the requirements of 66 Pa. C.S. § 1311 and the Public Utility Commission's Final Rulemaking Order for the Implementation of Act 120 of 2018 (Public Meeting of February 24, 2022, Docket No. L-2020-3019521), CWC is now submitting this modification to its LTIIP to incorporate CWC's LSLR Plan into its LTIIP. CWC's LSLR Plan addresses the Company's efforts to replace Company-owned and Customer-owned service lines made of lead materials as

[1] The Pennsylvania Public Utility Commission authorized CWC to establish a DSIC through Final Order dated April 17, 2003 at Docket No. P-00021979.

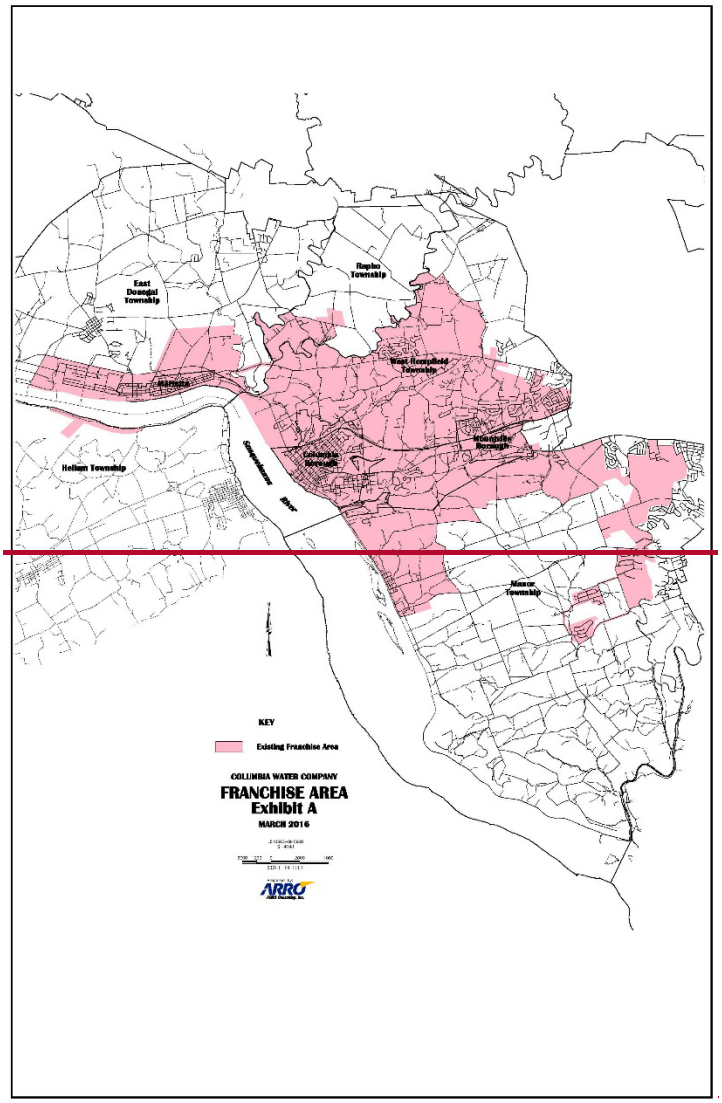
~~[2] The Pennsylvania Public Utility Commission authorized CWC to include the Marietta Rate District into its DSIC program through Final Order dated March 1, 2018 at Docket No. R-2017-2598203.~~

[2] The Pennsylvania Public Utility Commission authorized CWC to include the Marietta Rate District into its DSIC program through Final Order dated March 1, 2018 at Docket No. R-2017-2598203.

[3] The Pennsylvania Public Utility Commission authorized CWC to acquire the East Donegal Township Municipal Authority through Order dated February 3, 2022 at Docket No. A-2021-3027134, *et al.*

approved at Docket No. P-2023-_____. The modified-LTIIP only applies to the East Donegal Rate District to the extent necessary to implement its LSLR Plan.[4]

CWC provides public water service to residential, commercial, public and industrial customers in Columbia, Marietta and Mountville Boroughs, West Hempfield, Manor, and East Donegal Townships, Lancaster County and Hellam Township, York County, Pennsylvania. CWC served approximately ~~10,400~~12,154 customers at the end of year ~~2021~~2022. Figure 1 shows the CWC service area covered by this LTIIP.



[4] The East Donegal rate district does not have a DSIC. As a result, the Company does not include East Donegal capital improvements in its DSIC. Similarly, LSLR costs that are attributable to the East Donegal system will not be recovered through the DSIC. The Company, however, reserves the right to request Commission approval to apply the DSIC to the East Donegal Rate District and recover these LSLR costs and all other DSIC-eligible costs attributable to the East Donegal Rate District through the DSIC.

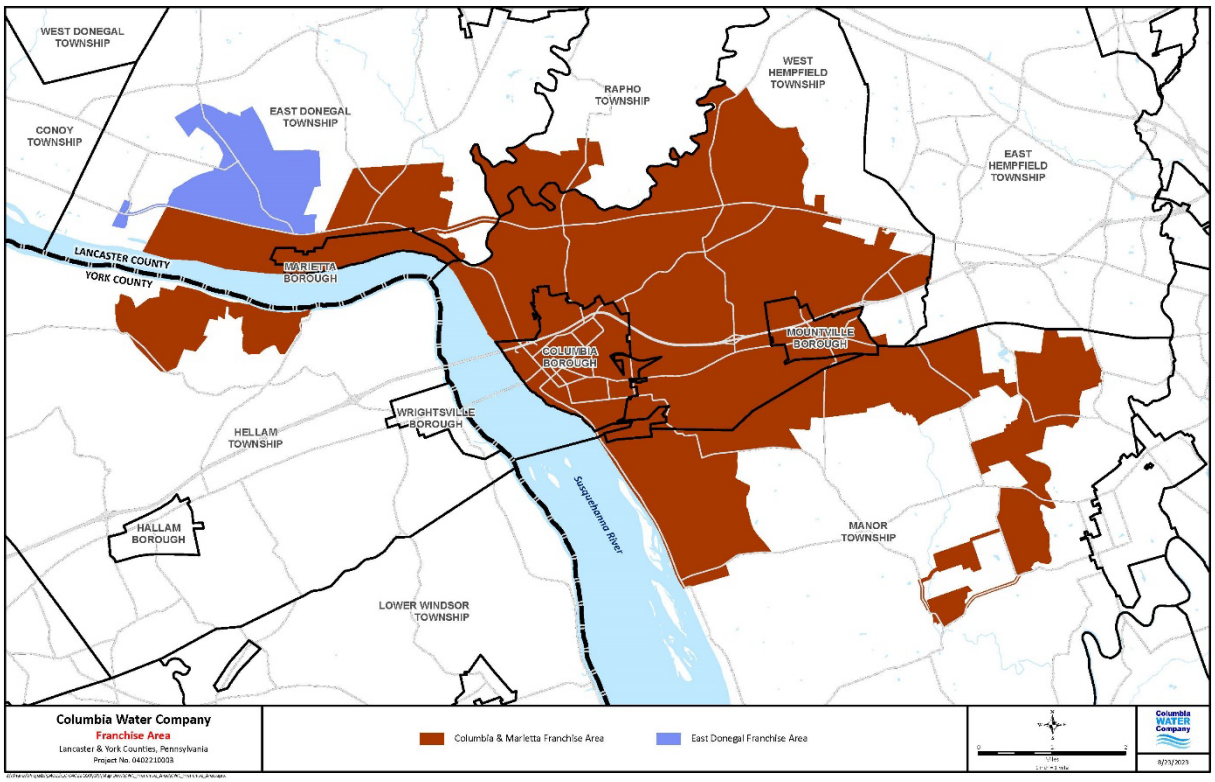


Figure 1 – Columbia Water Company Service Area

The CWC distribution system is comprised of water mains that vary in size from 4-inch through 36-inch with the material type being mainly cast iron and ductile iron. The age of the water mains range from the 1870s through ~~2021~~2023. The condition of the pipes vary throughout the system and age is not always the best indicator of pipe condition. Other factors like the original quality of the pipe, installation and geology impact the pipe condition and reliability.

This LTIIP identifies how CWC will use the DSIC to replace aging infrastructure at an accelerated pace. This LTIIP will identify the types and ages of infrastructure eligible for DSIC recovery; schedule for the planned replacements; location of the eligible property; estimates of the quantity to be replaced; projected annual expenditures; manner in which the replacement will be accelerated; workforce management plan to ensure work is completed safely and cost effectively; and description of outreach to other utilities to minimize disruption to customers; as well as the benefit to customers of accelerated infrastructure rehabilitation and replacement.

This LTIIP will also incorporate the Company's LSLR Plan into its LTIIP. In October 2018, Governor Wolf signed into law Act 120 of 2018 (Act 120), which became effective on December 23, 2018. Act 120 amended Section 1311(b) of the Public Utility Code in order to, *inter alia*, authorize water utilities to pursue comprehensive replacement of lead service lines (LSLs) that remain in service across Pennsylvania subject to Commission approval. The Commission promulgated its LSLR Regulations requiring a Class A water public utility to remove and replace all LSLs, whether entity-owned or customer-owned, within or connected to its water distribution systems within 25 years from the effective date of the Commission's regulations. Moreover, 52

Pa. Code § 65.54(b) requires that the utility shall include with its LSLR Program a modified LTIIP containing a LSLR plan as a separate and distinct component of the entity's LTIIP. Accordingly, Columbia Water has begun efforts to replace LSLs in its system, including galvanized materials downstream of a LSL, as well as any lead pigtail, gooseneck, or other fitting that is connected to a LSL. This LTIIP will identify how CWC will incorporate its LSLR Plan into its LTIIP to continue replacing aging infrastructure in combination with the replacement of LSLs.

Section 1 – Types and Age of Eligible Property

A listing of all eligible property, as defined in 66 Pa. C.S. §1351-(3), is provided in this section. CWC developed and integrated a Geographic Information Systems (GIS) to map and manage its water system assets. The water system assets such as water mains, valves, hydrants, tanks, and service lines are spatially located and attributed with information about the distribution system. This information is supplemented with paper mapping and files as necessary. This process provides the means for CWC to document data and provides the Company with an efficient means to identify DSIC eligible facilities for replacement. These efficiencies translate into direct savings to the customers by specifically targeting the appropriate facilities to be replaced.

CWC has also developed a LSL inventory to locate, track, and replace Company-owned and Customer-owned service lines that contain lead, galvanized steel downstream of a LSL, and lead pigtails, goosenecks, or other fittings connected to LSLs. Columbia Water has incorporated the LSL inventory into its GIS to map and manage these assets. This information is supplemented with paper mapping and files as necessary.
CWC owns the following water system components:

Water mains – In a water distribution system the water mains form the network necessary to distribute water to the customers. Larger water mains are used to move large volumes of water to pressure zones and key demand areas. Smaller mains fill in the network and are normally located beneath the streets and roads in the front of homes, businesses, schools and factories. Water gets delivered from the water main to the customer through a service line. CWC owns approximately 722,890 Linear Feet (LF) of water mains, not including the East Donegal Rate District. The material type of the water main generally depends on the installation date and the installing party. Newer mains are normally ductile iron cement lined (DICL) pipe with the older mains being mainly unlined cast iron pipe. Very limited pockets of polyvinyl chloride (PVC) exist within the system.

Company-Owned Service lines - Water gets delivered from the water main to the customer's curb stop through a Company-owned, pressurized service line. CWC owns the service line between the water main and the curb stop ~~("Company-owned service line"). The service line from the curb stop to the customer's building ("Customer-owned service line") is owned by the customer and any replacement of the customer's portion of the service line is the responsibility of the customer and thus Customer-owned service lines are not included in this LTIIP.~~ (Company-owned service line). The Company-owned service lines vary in size from 6-inch down to ¾-inch with a majority of CWC's service lines being constructed of copper. ~~Only copper is used when Company-owned service~~

~~lines are replaced.~~ A small portion of Company-owned service lines may be made of lead. Only copper is used when Company-owned service lines are replaced. The Company owns approximately 10,407 service lines for its Columbia and Marietta Rate Districts and 1,718 service lines for its East Donegal Rate District. The Company estimates the total number of Company-owned LSLs that need to be replaced to be less than 400. CWC plans to identify, at a minimum, a cumulative average of 10.0% of the initial unknown service materials annually by means of utilizing existing records, modeling, statistical analysis, and mechanical excavation.

Valves – Valves are used to control the volume and direction of flow in the distribution system. They are also used to isolate sections of water main for replacements or repairs. Almost all valves are buried and are opened or closed through a valve box that extends from the valve to the ground surface. The valves vary in size from 4-inch through 16-inch. CWC owns approximately 3,535 valves in its system, not including the East Donegal Rate District.

Hydrants – Hydrants are typically located along roadways and right-of-ways. Hydrants are used to flush water from the water system and to assist in fighting fires. Generally, a hydrant can be isolated from the distribution system by opening or closing a dedicated hydrant valve. Hydrants play a critical role in system maintenance and community fire protection. CWC owns approximately 978 hydrants in its system~~.~~, not including the East Donegal Rate District.

Meters – Meters are used to measure the amount of water used by a customer. Meters are sized based upon the amount of water a customer uses. Typically residential customers have a 5/8-inch or 3/4-inch meter. Commercial customers have meters that range from 3/4-inch through 2-inch meters. Industrial customers normally have meters in the 2-inch through 6-inch range. CWC owns approximately 10,407 meters in its system, not including the East Donegal Rate District.

Customers own the following water system components:

Customer-Owned Service Lines - the portion of the service line extending from the Curb Stop to the meter or one foot inside a building foundation, whichever is farther (Customer-owned service line). The Customer-owned service line is owned by the customer. Generally, any replacement of the Customer-owned service line is the responsibility of the customer and not included in this LTIIP. However, Customer-owned service lines are included in this LTIIP only for purposes of the LSLR Plan and the replacement of Customer-owned service lines made of lead materials. The Customer-owned service lines vary in size from 6-inch down to ¾-inch with a majority of Customer-owned service lines being constructed of copper. A small portion of Customer-owned service lines may be made of lead. Copper or plastic is used when Customer-owned service lines are replaced pursuant to the LSLR Plan. The Company has identified approximately 12,115 Customer-owned service lines across all three rate districts. The Company estimates the total number of Customer-owned LSLs that need to be replaced to be less than 400. CWC plans to identify, at a minimum, a cumulative average of 10.0% of the initial unknown service

materials annually by means of utilizing existing records, modeling, statistical analysis, and mechanical excavation.

Table 1 provides a breakdown of eligible property by type~~.~~, not including the property eligible for replacement under the LSLR Plan. Table 2 provides a breakdown of the water main by size. Table 3 provides a breakdown of eligible property for the LSLR Plan. Table 5 provides a breakdown of the company side and customer side service line materials eligible under the LSLR Plan by material.

Table 1 – Types and Age of Eligible Property

Property Type	Quantity***	Age (Year)
Water mains **	722,890 LF	1875 - ~~2021~~2023
Company-owned service lines	10,407 EA	1875 - ~~2021~~2023
Valves	3,535 EA	1875 - ~~2021~~2023
Hydrants	978 EA	1875 - ~~2021~~2023
Meters	10,407 EA	1990 - ~~2021~~2023

** - less than 2% of all water mains were installed prior to 1900.

*** - does not include the East Donegal Rate District.

Table 2 – Quantity of Water Mains by Size

Water Main Diameter (inches)	Quantity (Linear Feet~~))~~**
4	7,550
6	143,650
8	311,050
10	52,200
12	195,000
16	13,100
36	340
TOTAL	**722,890**

** - does not include the East Donegal Rate District.

Table 3 – Types and Age of Eligible Property Under the LSLR Plan

Property Type	Quantity**	Age (Year)
Company-owned service lines	12,051 EA	1875 – 2023
Customer-owned service lines	12,050 EA	1875 - 2023

** - only eligible to the extent the service lines are made of lead materials.

Table 4 – Company-Side and Customer-Side Service Lines Eligible Under the LSLR Plan by Material

Company Side Material		Customer Side Material	
Lead	4	Lead	1
Copper	4,297	Copper	2,135
Unlikely Lead	4,560	Unlikely Lead	5,103
Unknown	3,173	Unknown	4,807
Likely Lead	1	Likely Lead	1
Other	16	Other	3
TOTAL	12,051	TOTAL	12,050

Section 2 – Schedule for Planned Replacement of Eligible Property

CWC understands the importance and benefits of continuous renewal of aging infrastructure to continue to provide safe and reliable service to our customers. This section provides an overview of the planning process for replacing aging water distribution system infrastructure~~.~~ and Company-owned and Customer-owned LSLs. This section does not discuss the planning process for new water main extensions or for improvements to treatment, storage and pumping facilities since they are not DSIC eligible.

Many components must be evaluated and weighted when determining which infrastructure to replace in a given year. In general the following components, in order of priority, are used to select infrastructure to replace each year:

- Planned state highway improvements;
- Planned municipal street improvements;
- Planned large scale improvements by other utilities;
- Water main break frequency;
- Age;
- Material quality; and
- Installation quality.

The first three items are given the highest priority since CWC has little to no influence on the scheduling of work by outside entities. CWC understands the significant benefit to the customers and municipalities when infrastructure is replaced and/or improved concurrently with other public infrastructure work. CWC meets at least annually with the municipalities in which it serves public water to coordinate the replacement of water system infrastructure with planned street upgrades. This directly reduces the cost to the Company and thus, to customers, by providing for less construction work and expense to replace these lines.

With respect to material quality, the Company will prioritize the replacement of services lines made of lead materials. These projects will be prioritized based on targeted sensitive populations as defined by the Environmental Protection Agency (EPA) and the Pennsylvania Department of Environmental Protection (PADEP), which includes areas with elevated levels of lead in tap water, areas with high concentrations of lead service lines, and/or areas of the distribution system which have elevated corrosion rates. A list of sensitive populations has also been developed to determine the service line materials. The list includes schools, nursing homes, large apartment buildings, churches, and industries. These service lines have been or will be detailed as sensitive populations in the Service Line Inventory. Homes with multiple meters and multiple family residents will also be prioritized to determine service line material.

Lead materials will be identified through four methods: (1) in combination with main replacements, (2) through mechanical excavation, (3) through customer self-surveys, and (4) emergency repairs, as set forth below:

In Combination with Main Replacements - As part of its broader LTIIP efforts, Columbia Water will analyze record-reviews of old age mains within the oldest parts of the distribution system to determine which water mains in the distribution system should be replaced. Prior to choosing a LSLR Project Area, the Company's distribution crew will review records and/or physically inspect a portion of the service lines within a proposed area to gauge the likelihood of lead within that area. Coordination with municipalities will take place to minimize costs and minimize impacts on roads and neighborhoods. Once the LSLR Project Areas are determined, the projects will be posted on the Columbia Water website at least six (6) months in advance of the work being done. Prior to the work being initiated, Columbia Water staff will reach out to the customers to determine all service line materials within the affected area, and to provide the customers with detailed information regarding the routine procedures and the potential health risks involved.

Mechanical Excavation - Areas with a higher likelihood of having lead service lines will be prioritized for these projects. Columbia Water will physically excavate the service lines to determine material types. If a service line is determined to be lead, coordination will occur with the customer(s) and the property owner to have the service line replaced.

Customer Self-Surveys - Columbia Water will reach out to the customers with lead, galvanized requiring replacement, or unknown service lines. Customers who discover a lead service line may call and schedule to have their service line replaced. CWC will schedule to replace customer-owned lead service lines. If the company side is lead, it will

be replaced at the same time with the customer side. These replacements will occur as discovered.

Emergency Repair - If a lead service line is leaking or otherwise defective at the time it is discovered, CWC will replace the lead service line in accordance with its tariff. Columbia Water staff will maintain the proper equipment and tools necessary for emergency service line replacements. If a lead service line is discovered during an emergency but is not leaking, the replacement of the line will be scheduled for replacement at a later date.

The Company plans to undertake repair and replacement of its system components in the following manner:

Water main replacement – Work normally entails full replacement of the water main (as opposed to rehabilitate) since this option eliminates long-term structural and integrity deficiencies that remain when a water main is simply rehabilitated. Further, this option is also considerably less disruptive to the customer since the new main can be installed, tested and placed into service before moving service lines from the old main to the new main. Disruption of water service is minimal since the customer is without service during their service line switch over only. In areas where considerable construction or restoration costs would be incurred to replace a water main, rehabilitation of the existing main is pursued.

Valve and hydrant replacement – Work normally involves the full replacement of the valve and hydrant. Occasionally a relatively new valve or hydrant will be rebuilt and/or reused but only in those situations where the reliability and integrity are well known. Valves and hydrants normally get replaced at the same time a water main is being replaced or rehabilitated. There are times when critical valves and hydrants are replaced independently of a full scale water replacement project. Properly operating valves greatly benefit the customers since it minimizes the geographic area impacted by a main repair and minimizes the amount of time needed to make a repair. A schedule of valve and hydrant replacements is provided in Table ~~1~~5.

Company-Owned Service line replacement – Work normally involves the full replacement of the company-owned service line between the water main and the curb stop. The work will include replacement of the curb stop and curb box. Company-owned service lines get replaced during full scale water replacement projects or if the Company determines they otherwise need to be replaced due to conditions including but not limited to leaks or malfunction.

Meter replacement or repair– Residential and commercial meters normally involve full replacement. Some commercial and industrial meters can be rehabilitated. Meter replacement is typically based upon meter age. CWC replaces its meters in compliance with the schedule in the Commission's regulation at 52 Pa. Code § 65.8. Accelerated replacement of meters will benefit customers directly through more accurate meter readings.

Lead service line replacement – Work involves replacing Company-owned and Customer-owned LSLs using existing routes through a combination of pipe splitting and/or pipe pulling. This approach removes or displaces existing pipe while simultaneously replacing it with a new pipe and is the preferred method under normal circumstances. Columbia Water may also utilize guided boring to install new pipe along a different route or using open trench excavation to remove replace the pipe. The appropriate replacement technique will depend on a combination of many site-specific characteristics, including, but not limited to, time constraints, soil characteristics, depth to ground water or rock, depth of road foundation, condition of the service line, proximity of other utility services (e.g., electric, gas, cable, sewer, storm water), site conditions (e.g., access, parking, paving, landscaping, overhead obstructions), pipe conditions (e.g., length of pipe, pipe diameter and wall thickness, bury depth, configuration, and repair history, and conditions inside the home like a finished basement with limited access to the water meter and plumbing. All new pipe installation will be copper or plastic.

Section 3 – Location of Eligible Property

All of the CWC's eligible property is located in Lancaster and York Counties, Pennsylvania. More specifically, the property is located in the boroughs of Columbia, Marietta and Mountville and in portions of the townships of West Hempfield, East Donegal, Hellam and Manor. See Figure 1 for additional details.

Areas with Company-owned and Customer-owned LSLs are more specifically found on houses built prior to 1950 with water mains older than 1970 within Columbia Borough and Marietta Borough. Though lead service line materials may be found in Mountville Borough and in portions of the townships of West Hempfield, East Donegal, Hellam and Manor. See Figure 1 for additional details.

Section 4 – Estimate of the Quantity of Eligible Property to be Replaced

Table ~~3~~5 identifies eligible property that is projected to be replaced in the next five years. These quantities were prepared based upon the best available information (planned municipal and utility projects, main break data, pipe age, etc.) at the time this plan was prepared. Actual quantities may vary depending on conditions that could change in the distribution system or changes made by the municipalities to their street projects.

Table ~~3~~5 – Projected Quantities of Eligible Property to be Replaced for 2023 - 2027

Year	Water Main (LF)	Service lines (ea.)	Valves	Hydrants	Meters
2023	1,200	30	5	3	140
2024	1,200	~~30~~50	5	3	140
2025	1,200	~~30~~50	5	3	140

2026	1,200	~~30~~50	5	3	140
2027	1,200	~~30~~50	5	3	140

Prior to 2024, the LTIIP contained 30 service line replacements. The Company-owned service lines being replaced were primarily made of lead materials. The Company is now planning to undertake 50 service line replacements, which includes replacing Company-owned and Customer-owned LSLRs, on an annual basis beginning in 2024.

Section 5 – Projected Annual Expenditures

The projected annual expenditures for the 2023 to 2027 period are listed in Table ~~4~~6 below. These estimates are based upon the quantities listed in Table ~~3~~5 and recent construction costs. A break down by category is provided in Table ~~5~~7.

Table ~~4~~6 – Projected Annual Expenditures for 2023 - 2027

Year	Projected Annual Expenditures
2023	$280,000
2024	$~~280~~380,000
2025	$~~280~~380,000
2026	$~~280~~380,000
2027	$~~280~~380,000

Table ~~5~~7 – Projected Annual Expenditures by Category for 2023 - 2027

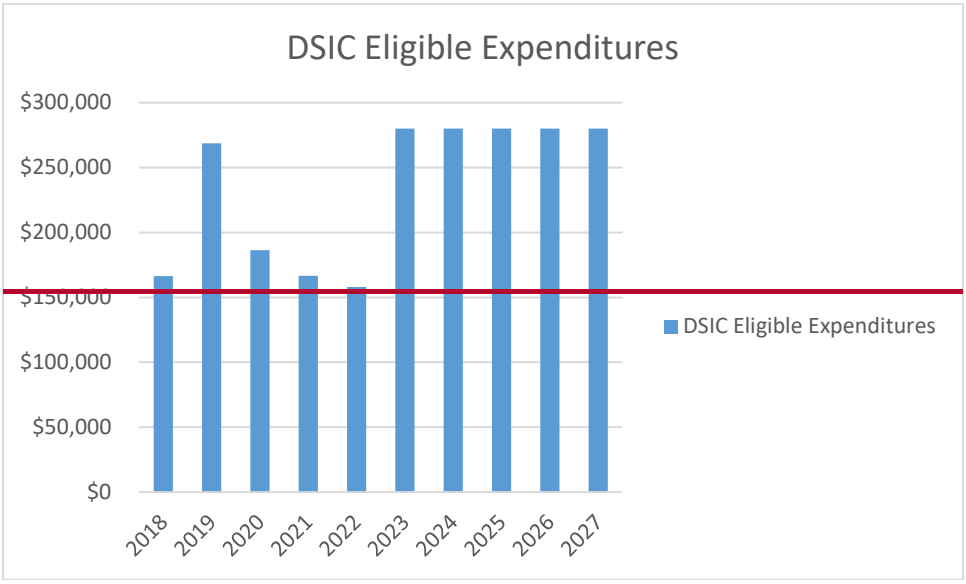
Year	Water Main	Service ~~lines~~Lines	Valves	Hydrants	Meters	Total
2023	$160,000	$45,000	$15,000	$10,000	$50,000	$280,000
2024	$160,000	$~~45~~145,000	$15,000	$10,000	$50,000	$~~280~~380,000
2025	$160,000	$~~45~~145,000	$15,000	$10,000	$50,000	$~~280~~380,000
2026	$160,000	$~~45~~145,000	$15,000	$10,000	$50,000	$~~280~~380,000
2027	$160,000	$~~45~~145,000	$15,000	$10,000	$50,000	$~~280~~380,000

Prior to 2024, the Company was already investing $45,000 into replacing primarily Company-owned service lines made of lead. The Company is committing to an additional $100,000 for a total of $145,000 for Company-owned and Customer-owned LSLRs beginning in 2024. For all projects, the most prudent, cost-effective methods will be used to complete the project. Almost all eligible property is abandoned in place after the replacement infrastructure is installed and therefore is not salvageable. Meters can be salvaged and are sold at local salvage yards.

Section 6 – Acceleration of Infrastructure Replacement

CWC has a track record of investing in its infrastructure to maintain safe and reliable service to all of its customers including infrastructure not eligible for DSIC. Over the past 5 years considerable investment has occurred in major upgrades of its water system including a system-wide security system, four (4) emergency generators, repainted two tanks, and installing a new intake in the Susquehanna River. In addition CWC purchased an adjacent water system that was being operated by part-time contractors.

In addition to the capital expenditures listed above, CWC, through the use of its DSIC, continued to replace water mains, Company-owned service lines, valves, hydrants and meters. Figure 2 graphs the projected and historical DSIC eligible capital expenditures. With the completion of the large projects listed above, additional capital will be directed towards expediting infrastructure replacement.



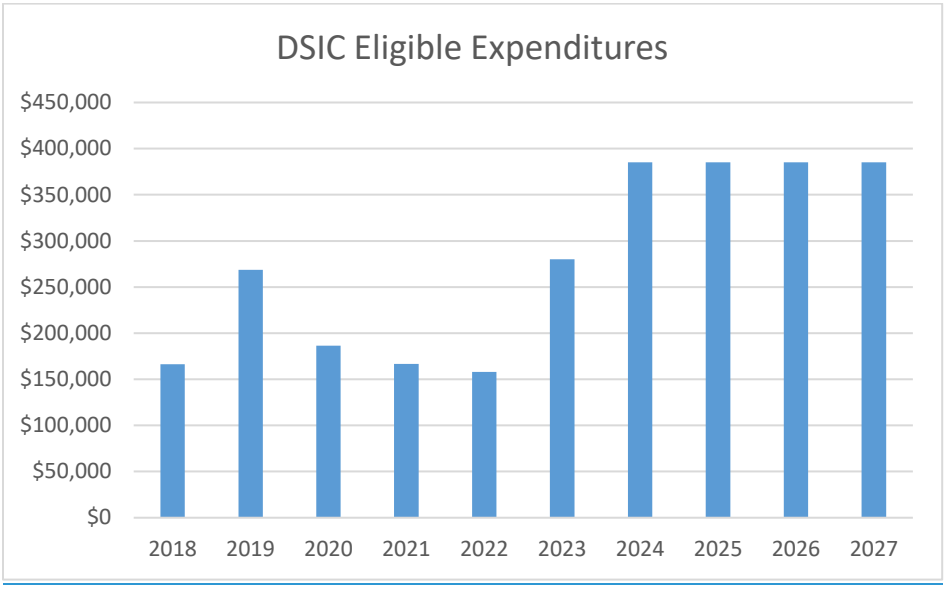


Figure 2 – Projected and Historic DSIC Eligible Expenditures

The projected DSIC eligible expenditures will accelerate the replacement of infrastructure by approximately 80 percent. Moreover, through the Company's LSLR Plan, the Company will make a concerted effort to replace existing LSLs in a timely manner within the time frame set forth in 52 Pa. Code § 65.53(a). The LSLR Plan will take place in conjunction with Columbia Water's other infrastructure investments.

Section 7 – Workforce Management Plan and Training

To ensure system reliability, public safety, quality installation and cost-effectiveness, all DSIC eligible projects will be constructed by qualified personnel. CWC uses a competitive bidding process for the purchase of piping, valves and hydrants. A list of materials is prepared for the project and sent to the four (4) major pipe suppliers for price quotes. CWC utilizes its own staff and equipment for the installation of water mains, ~~company~~Company-owned service lines, Customer-owned service lead service lines, valves, hydrants and meters. Company employees utilized for this type of work have extensive training in the use of heavy equipment, pipe laying procedures, disinfection procedures and safety training. For water mains greater than 12-inches in diameter, stream crossings or expedited Pa DOT projects, CWC uses qualified local contractors for water main, valves and hydrant installations. These local contractors are prequalified based upon experience with similar projects, safety record, and qualifications of personnel. All project sites are inspected regularly throughout the construction process by Company personnel.

Section 8 – Outreach and Coordination with other Utilities

CWC meets annually, and often times more frequently, with the municipalities where it provides pubic water service to coordinate the replacement of water main with the reconstruction and/or repaving of streets and roadways. These meetings often times include the other utilities serving the same areas. CWC coordinates its replacement projects to coincide with other planned roadway and utility work. PaDOT is very effective at notifying utilities well ahead of planned state highway projects making coordination of the work an easy process. In each of the municipalities where CWC provides public water service, public officials have a strong record of planning street projects far enough in advance to allow each of the major utilities to upgrade facilities as necessary.

For each project, CWC coordinates all work with the state or local municipality through planning meetings and the permitting process. In addition, CWC utilizes the PA One Call system to minimize utility conflicts and notifies customers of proposed work with door hangers throughout the construction process.

Section 9 – Lead Service Line Replacement Plan

In accordance with the requirements of 66 Pa. C.S. § 1311 and the Public Utility Commission's Final Rulemaking Order for the Implementation of Act 120 of 2018 (Public Meeting of February 24, 2022, Docket No. L-2020-3019521), CWC is submitting this Lead Service Line Replacement Plan (LSLR Plan). CWC's LSLR Plan addresses the Company's efforts to replace company-owned and customer-owned Lead Service Lines as approved at Docket No. P-2023-_____.

Lead is a heavy metal that commonly occurs in our environment. Humans can be exposed to lead through a variety of sources, including dust, soil, or paint chips, as well as through ingestion from drinking water. The deleterious health effects of lead are now well-recognized. Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems.

In October 2018, Governor Wolf signed into law Act 120 of 2018 ("Act 120"), which became effective on December 23, 2018. Act 120 amended Section 1311(b) of the public Utility Code in order to, *inter alia*, authorize water utilities to pursue comprehensive replacement of lead service lines that remain in service across Pennsylvania subject to Commission approval.

Pursuant to Act 120, the Commission promulgated its LSLR Regulations at 52 Pa. Code § 65.51, *et seq*., which became effective on July 23, 2022. 52 Pa. Code § 65.53 states that "[a]n entity…shall remove and replace all LSLs, whether entity-owned or customer-owned, within or connected to its water distribution systems within 25 years from the effective date of this section for a Class A public utility…" 52 Pa. Code § 65.54(a) and 65.55(a) further states that a Class A public utility or authority shall file a Petition for an LSLR Program within 1 year of the effective date of this section, or by July 23, 2023. Moreover, 52 Pa. Code § 65.54(b) requires that the utility shall include with its LSLR Program a modified LTIIP containing a LSLR plan as a separate and distinct component of the entity's LTIIP.

Accordingly, Columbia Water has begun efforts to replace lead service lines in its system, including galvanized materials downstream of a lead service line, as well as any lead pigtail, gooseneck, or other fitting that is connected to a lead service line. This section of the LTIIP will identify how CWC will incorporate its LSLR Plan into its LTIIP to continue replacing aging infrastructure in combination with the replacement of lead service lines.

(1) Identification of types and age of eligible property owned and operated by the utility for which it is seeking DSIC recovery.

A listing of the eligible property, as defined in 66 Pa. C.S. §1351(3), is provided in this section. CWC developed a lead service line inventory to locate, track, and replace company-owned and customer-owned service lines that contain lead, galvanized steel downstream of a lead service line, and lead pigtails, goosenecks, or other fittings connected to lead service lines. Columbia Water is currently working to incorporate the service line Inventory into its GIS to map and manage these assets. This information is supplemented with paper mapping and files as necessary.

CWC owns the following water system components:

Company-Owned Service Lines – Water gets delivered from the water main to the customer's curb stop through a Company-owned, pressurized service line. CWC owns the service line between the water main and the curb stop ("Company-Owned Service Line"). The Company-Owned Service Lines vary in size from 6-inch down to ¾-inch with a majority of CWC's service lines being constructed of copper. Only copper is used when Company-owned service lines are replaced.

The customer owns the following water system components:

Customer-Owned Service lines – The portion of the lead service line extending from the Curb Stop to the meter or one foot inside a building foundation, whichever is farther ("Customer-Owned Service Line"). Generally, any replacement of the Customer-Owned Service Line is the responsibility of the customer. However, Customer-Owned Service Lines are included in this LTIIP only for purposes of the LSLR Plan. The Customer-Owned Service Lines vary in size from 6-inch down to ¾ inch with a majority of Customer-Owned Service Lines being constructed of copper. Copper or plastic is used when Customer-Owned service lines are replaced pursuant to the LSLR Plan.

Table 6 provides a breakdown of the company side materials and customer side materials by type. Table 7 provides a breakdown of the service lines by type and size.

Table 6 – Company Side and Customer Side Materials by Type

Company Side Material		Customer Side Material	
Lead	3	Lead	0
Copper	2921	Copper	712
Unlikely Lead	5921	Unlikely Lead	6477
Unknown	3267	Unknown	4923
Likely Lead	0	Likely Lead	0
Other	16	Other	3
TOTAL	12125	TOTAL	12115

Table 7 – Service Lines by Size and Type

Full Line Classification										
	3/4	1	1 1/2	2	3	4	6	8	Unknown	Total
Lead	3	0	0	0	0	0	0	0	0	3
Non-Lead	3,251	41	35	48	5	3	0	0	1,078	4,461
Lead Status Unknown	7,062	137	31	113	5	25	50	13	229	7,665
Galvanized Requiring Replacement	0	0	0	0	0	0	0	0	0	0
TOTAL	10,316	178	66	161	10	28	50	13	1,307	12,129

Based on the initial inventory, the Company has identified three (3) lead service lines on the company-owned portion of the service line. The Company estimates the total number of lead service lines that will need to be replaced to be less than 400. CWC plans to identify, at a minimum, a cumulative average of 10.0% of the initial unknown service materials annually by means of utilizing existing records, modeling, statistical analysis, and mechanical excavation.

(2) An initial schedule for planned repair and replacement of eligible property.

As part of its broader LTHP efforts, Columbia Water will analyze record reviews of old age mains within the oldest parts of the distribution system to determine which water mains in the distribution system should be replaced. Prior to choosing a target area, the Company's distribution crew will review records and/or physically inspect a portion of the service lines within a proposed area to gauge the likelihood of lead within that area. Coordination with municipalities will take place to minimize costs and minimize impacts on roads and neighborhoods. Once the targeted areas are determined, the projects will be posted on the Columbia Water website at least six (6) months in advance of the work being done. Prior to the work being initiated, Columbia Water staff will reach out to the customers to determine all service line materials within the affected area, and to provide the customers with detailed information regarding the routine procedures and the potential health risks involved.

With respect to replacing LSLs discovered during mechanical excavation, areas with a higher likelihood of having lead service lines will be prioritized for these projects. Columbia Water will physically excavate the service lines to determine material types. If a service line is determined to be lead, coordination will occur with the customer(s) and the property owner to have the service line replaced.

With respect to replacing customer-owned LSLs discovered inside the building, Columbia Water will reach out to the customers with lead, galvanized requiring replacement, or unknown service lines. Customers who discover a lead service line may call and schedule to have their service line replaced. CWC will schedule to replace customer-owned lead service lines. If the company side is lead, it will be replaced at the same time with the customer side. These replacements will occur as discovered.

If a lead service line is leaking or otherwise defective at the time it is discovered, CWC will replace the lead service line in accordance with its tariff. Columbia Water staff will maintain the proper equipment and tools necessary for emergency service line replacements. If a lead service line is discovered during an emergency but is not leaking, the replacement of the line will be scheduled for replacement at a later date.

Determination of LSLR projects under these three procedures will be prioritized based on targeted sensitive populations as defined by the EPA and PADEP, which includes areas with elevated levels of lead in tap water, areas with high concentrations of lead service lines, and/or areas of the distribution system which have elevated corrosion rates. A list of sensitive populations has also been developed to determine the service line materials. The list includes schools, nursing homes, large apartment buildings, churches, and industries. These service lines have been or will be detailed as sensitive populations in the Service Line Inventory. Homes with multiple meters and multiple family residents will also be prioritized to determine service line material.

Columbia Water intends to replace LSLs using existing routes through a combination of pipe splitting and/or pipe pulling. This approach removes or displaces existing pipe while simultaneously replacing it with a new pipe and is the preferred method under normal circumstances. Columbia Water may also utilize guided boring to install new pipe along a different route or using open trench excavation to remove replace the pipe. The appropriate replacement technique will depend on a combination of many site-specific characteristics, including, but not limited to, time constraints, soil characteristics, depth to ground water or rock, depth of road foundation, condition of the service line, proximity of other utility services (e.g., electric, gas, cable, sewer, storm water), site conditions (e.g., access, parking, paving, landscaping, overhead obstructions), pipe conditions (e.g., length of pipe, pipe diameter and wall thickness, bury depth, configuration, and repair history, and conditions inside the home like a finished basement with limited access to the water meter and plumbing. All new pipe installation will be copper or plastic.

(3) A general description of location of eligible property.

The areas with lead service lines are more specifically found on houses built prior to 1950 with water mains older than 1970 within Columbia Borough and Marietta Borough. Though lead service line materials may be found in Mountville Borough and in portions of the townships of West Hempfield, East Donegal, Hellam and Manor. See Figure 1 for additional details.

(4) A reasonable estimate of quantity of eligible property to be improved or repaired.

CWC plans to replace approximately 50 lead service lines per year. This projection was determined by estimating the total number of lead service lines to be less than 400. After all existing records have been inventoried, CWC will review this annual projection and adjust it as necessary.

(5) Projected annual expenditures and means to finance the expenditures.

The projected annual investment in lead service line replacements ("LSLR") is approximately $250,000. Table 8 identifies the number and cost of lead service lines that are projected to be replaced in the next five years.

Table 8 – Projected Number and Cost Associated with Lead Service Line Replacements

Year	Projected Number of Lead Service Line Replacements	Projected Annual Expenditures
2024	50	$250,000
2025	50	$250,000
2026	50	$250,000
2027	50	$250,000
2028	50	$250,000

The cost incurred by Columbia Water for LSLRs will be funded with a combination of commercial loans, cash from operations, and/or loans issued by the Pennsylvania Infrastructure Investment Authority.

(6) 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.

Through the Company's LSLR Plan, the Company will make a concerted effort to replace existing lead service lines in a timely manner within the time frame set forth in 52 Pa. Code § 65.53(a). The LSLR Plan will take place in conjunction with Columbia Water's other infrastructure investments.

(7) 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.

As with its other DSIC-eligible projects, lead service line replacements will be completed by qualified personnel. Columbia Water will use a competitive bidding process for the purchase of the necessary materials. A list of the materials will be prepared and sent to the four (4) major pipe suppliers for price quotes. CWC will then utilize its own staff and equipment for the installation of company-owned and customer-owned service lines. Company employees utilized for this work will have extensive training in the use of heavy equipment, pipe laying procedures, disinfection procedures and safety training. Qualified local contractors may be used for some projects depending on the level of work involved. Local contractors are prequalified based upon experience with similar projects, safety record, and qualifications of personnel. All project sites will be inspected regularly throughout the construction process by Company personnel.

~~(8) 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 LTIIP.~~

~~With its other DSIC-eligible projects, CWC meets annually, and often times more frequently, with the municipalities where it provides public water service to coordinate the replacement of water main with the reconstruction and/or repaving of streets and roadways. These meetings often times include the other utilities serving the same areas. CWC also coordinates its replacement projects to coincide with other planned roadway and utility work. The Pennsylvania Department of Transportation is very effective at notifying utilities well ahead of planned state highway projects making coordination of the work an easy process. In each of the municipalities where CWC provides public water service, public officials have a strong record of planning street projects far enough in advance to allow each of the major utilities to upgrade facilities as necessary. CWC will use these meetings and processes as an opportunity to identify lead service lines replacements that can be done in conjunction with other DSIC-eligible projects.~~

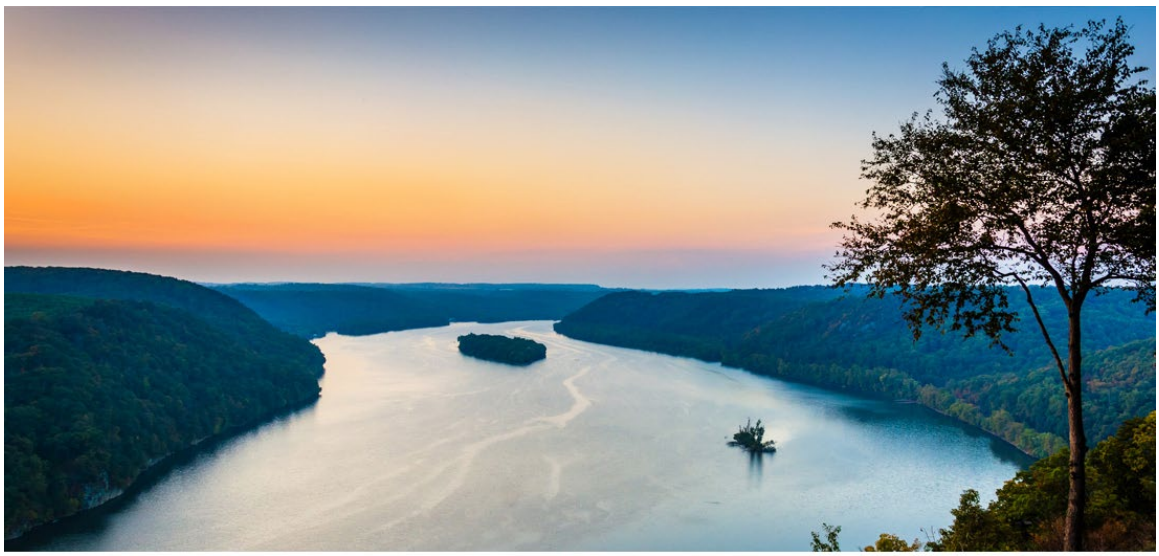
~~For each project, CWC coordinates all work with the state or local municipality through planning meetings and the permitting process. In addition, CWC utilizes the PA One Call system to minimize utility conflicts and notifies customers of proposed work with door hangers throughout the construction process.~~

LSLR PROGRAM – REVISED LTIIP (CLEAN)

COLUMBIA WATER COMPANY

MODIFIED
LONG-TERM INFRASTRUCTURE IMPROVEMENT PLAN

2023-2027



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Introduction

In accordance with the requirements of 66 Pa. C.S. §§ 1350 - 1360 and the Public Utility Commission's Final Order for the Implementation of Act 11 of 2012 (Public Meeting of August 2, 2012, Docket No. M-2012-2293611), Columbia Water Company's (CWC) Long-Term Infrastructure Improvement Plan (LTIIP) addresses infrastructure investment through its long-established and cost-effective Distribution System Improvement Charge (DSIC)[1,2].

Since its establishment of a DSIC in April of 2003, CWC has replaced over 27,400 feet of pipe. This represents about 3.8% of its distribution system pipe that has been renewed through the DSIC program. In addition to pipe, CWC has replaced 940 service lines which is approximately 9% of the total service lines and 5,330 old age meters which is over 51% of the Company's meters. This has allowed CWC to continue to provide safe and reliable service to its customers. In addition, the DSIC has allowed the Company to manage infrastructure replacement costs in an effective manner by directly targeting those costs without the need for additional rate case filings, the reasonable costs of which are borne by the ratepayers.

Prior to Commission approval of the Company's last rate filing on March 1, 2018 at Docket No. R-2017-2598203, the Company operated two districts known as the Columbia District and the Marietta District. For purposes of the DSIC, the March 1, 2018 Commission Order combined the rate districts and made the Marietta Rate District DSIC eligible. Prior to the March 1, 2018 Commission Order, only the Columbia Rate District was DSIC eligible. This LTIIP is for CWC's distribution system that is located in the Columbia and Marietta rate districts. On March 31, 2022, the Company acquired East Donegal Township Municipal Authority ("East Donegal").[3] The Company operates the East Donegal Rate District as a separate, independent system. Except to the extent necessary to carry out its Lead Service Line Replacement (LSLR) Plan (LSLR Plan), as discussed below, the Company's LTIIP does not include the distribution system located in the East Donegal Rate District.

In accordance with the requirements of 66 Pa. C.S. § 1311 and the Public Utility Commission's Final Rulemaking Order for the Implementation of Act 120 of 2018 (Public Meeting of February 24, 2022, Docket No. L-2020-3019521), CWC is now submitting this modification to its LTIIP to incorporate CWC's LSLR Plan into its LTIIP. CWC's LSLR Plan addresses the Company's efforts to replace Company-owned and Customer-owned service lines made of lead materials as approved at Docket No. P-2023-_____. The modified-LTIIP only applies to the East Donegal Rate District to the extent necessary to implement its LSLR Plan.[4]

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[1] The Pennsylvania Public Utility Commission authorized CWC to establish a DSIC through Final Order dated April 17, 2003 at Docket No. P-00021979.

[2] The Pennsylvania Public Utility Commission authorized CWC to include the Marietta Rate District into its DSIC program through Final Order dated March 1, 2018 at Docket No. R-2017-2598203.

[3] The Pennsylvania Public Utility Commission authorized CWC to acquire the East Donegal Township Municipal Authority through Order dated February 3, 2022 at Docket No. A-2021-3027134, *et al*.

[4] The East Donegal rate district does not have a DSIC. As a result, the Company does not include East Donegal capital improvements in its DSIC. Similarly, LSLR costs that are attributable to the East Donegal system will not be recovered through the DSIC. The Company, however, reserves the right to request Commission approval to apply

CWC provides public water service to residential, commercial, public and industrial customers in Columbia, Marietta and Mountville Boroughs, West Hempfield, Manor, and East Donegal Townships, Lancaster County and Hellam Township, York County, Pennsylvania. CWC served approximately 12,154 customers at the end of year 2022. Figure 1 shows the CWC service area covered by this LTIIP.

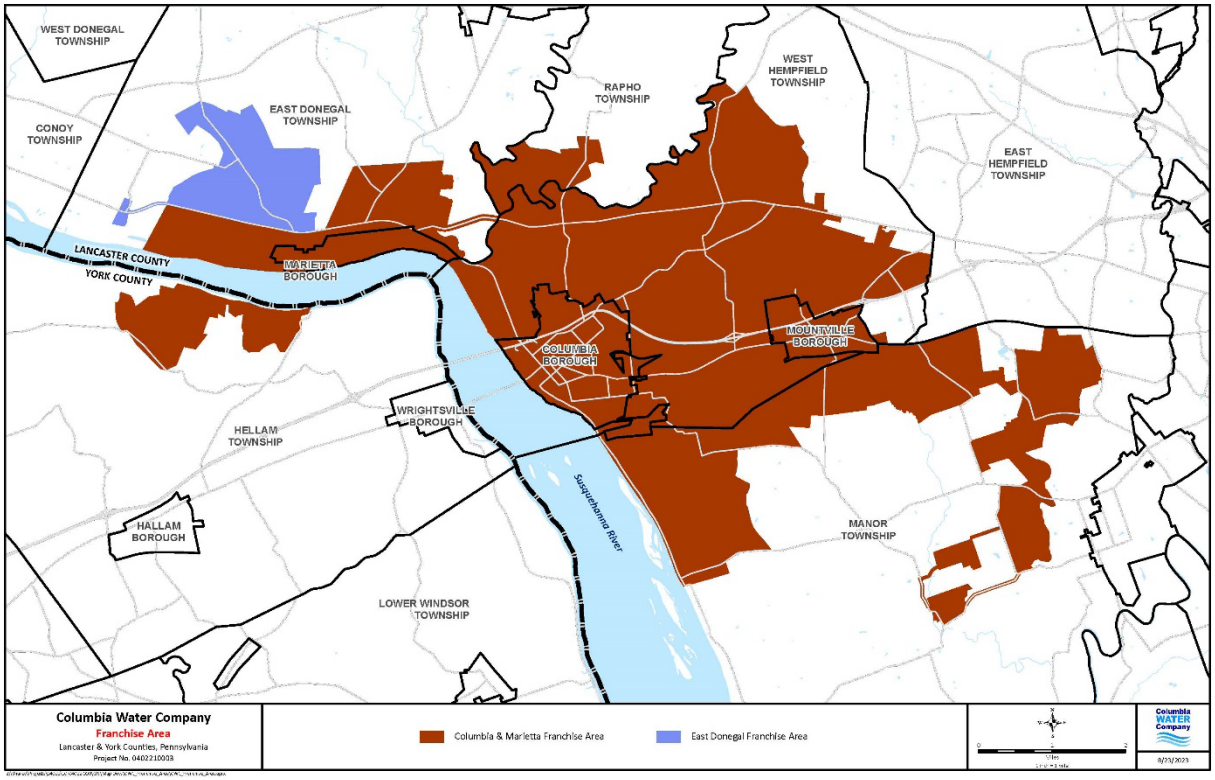

Figure 1 – Columbia Water Company Service Area

The CWC distribution system is comprised of water mains that vary in size from 4-inch through 36-inch with the material type being mainly cast iron and ductile iron. The age of the water mains range from the 1870s through 2023. The condition of the pipes vary throughout the system and age is not always the best indicator of pipe condition. Other factors like the original quality of the pipe, installation and geology impact the pipe condition and reliability.

This LTIIP identifies how CWC will use the DSIC to replace aging infrastructure at an accelerated pace. This LTIIP will identify the types and ages of infrastructure eligible for DSIC recovery; schedule for the planned replacements; location of the eligible property; estimates of the quantity to be replaced; projected annual expenditures; manner in which the replacement will be accelerated; workforce management plan to ensure work is completed safely and cost effectively; and description of outreach to other utilities to minimize disruption to customers; as well as the benefit to customers of accelerated infrastructure rehabilitation and replacement.

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the DSIC to the East Donegal Rate District and recover these LSLR costs and all other DSIC-eligible costs attributable to the East Donegal Rate District through the DSIC.

This LTIIP will also incorporate the Company's LSLR Plan into its LTIIP. In October 2018, Governor Wolf signed into law Act 120 of 2018 (Act 120), which became effective on December 23, 2018. Act 120 amended Section 1311(b) of the Public Utility Code in order to, *inter alia*, authorize water utilities to pursue comprehensive replacement of lead service lines (LSLs) that remain in service across Pennsylvania subject to Commission approval. The Commission promulgated its LSLR Regulations requiring a Class A water public utility to remove and replace all LSLs, whether entity-owned or customer-owned, within or connected to its water distribution systems within 25 years from the effective date of the Commission's regulations. Moreover, 52 Pa. Code § 65.54(b) requires that the utility shall include with its LSLR Program a modified LTIIP containing a LSLR plan as a separate and distinct component of the entity's LTIIP. Accordingly, Columbia Water has begun efforts to replace LSLs in its system, including galvanized materials downstream of a LSL, as well as any lead pigtail, gooseneck, or other fitting that is connected to a LSL. This LTIIP will identify how CWC will incorporate its LSLR Plan into its LTIIP to continue replacing aging infrastructure in combination with the replacement of LSLs.

Section 1 – Types and Age of Eligible Property

A listing of all eligible property, as defined in 66 Pa. C.S. §1351(3), is provided in this section. CWC developed and integrated a Geographic Information Systems (GIS) to map and manage its water system assets. The water system assets such as water mains, valves, hydrants, tanks, and service lines are spatially located and attributed with information about the distribution system. This information is supplemented with paper mapping and files as necessary. This process provides the means for CWC to document data and provides the Company with an efficient means to identify DSIC eligible facilities for replacement. These efficiencies translate into direct savings to the customers by specifically targeting the appropriate facilities to be replaced.

CWC has also developed a LSL inventory to locate, track, and replace Company-owned and Customer-owned service lines that contain lead, galvanized steel downstream of a LSL, and lead pigtails, goosenecks, or other fittings connected to LSLs. Columbia Water has incorporated the LSL inventory into its GIS to map and manage these assets. This information is supplemented with paper mapping and files as necessary.

CWC owns the following water system components:

Water mains – In a water distribution system the water mains form the network necessary to distribute water to the customers. Larger water mains are used to move large volumes of water to pressure zones and key demand areas. Smaller mains fill in the network and are normally located beneath the streets and roads in the front of homes, businesses, schools and factories. Water gets delivered from the water main to the customer through a service line. CWC owns approximately 722,890 Linear Feet (LF) of water mains, not including the East Donegal Rate District. The material type of the water main generally depends on the installation date and the installing party. Newer mains are normally ductile iron cement lined (DICL) pipe with the older mains being mainly unlined cast iron pipe. Very limited pockets of polyvinyl chloride (PVC) exist within the system.

Company-Owned Service lines - Water gets delivered from the water main to the customer's curb stop through a Company-owned, pressurized service line. CWC owns the service line between the water main and the curb stop (Company-owned service line). The Company-owned service lines vary in size from 6-inch down to ¾-inch with a majority of CWC's service lines being constructed of copper. A small portion of Company-owned service lines may be made of lead. Only copper is used when Company-owned service lines are replaced. The Company owns approximately 10,407 service lines for its Columbia and Marietta Rate Districts and 1,718 service lines for its East Donegal Rate District. The Company estimates the total number of Company-owned LSLs that need to be replaced to be less than 400. CWC plans to identify, at a minimum, a cumulative average of 10.0% of the initial unknown service materials annually by means of utilizing existing records, modeling, statistical analysis, and mechanical excavation.

Valves – Valves are used to control the volume and direction of flow in the distribution system. They are also used to isolate sections of water main for replacements or repairs. Almost all valves are buried and are opened or closed through a valve box that extends from the valve to the ground surface. The valves vary in size from 4-inch through 16-inch. CWC owns approximately 3,535 valves in its system, not including the East Donegal Rate District.

Hydrants – Hydrants are typically located along roadways and right-of-ways. Hydrants are used to flush water from the water system and to assist in fighting fires. Generally, a hydrant can be isolated from the distribution system by opening or closing a dedicated hydrant valve. Hydrants play a critical role in system maintenance and community fire protection. CWC owns approximately 978 hydrants in its system, not including the East Donegal Rate District.

Meters – Meters are used to measure the amount of water used by a customer. Meters are sized based upon the amount of water a customer uses. Typically residential customers have a 5/8-inch or 3/4-inch meter. Commercial customers have meters that range from 3/4-inch through 2-inch meters. Industrial customers normally have meters in the 2-inch through 6-inch range. CWC owns approximately 10,407 meters in its system, not including the East Donegal Rate District.

Customers own the following water system components:

Customer-Owned Service Lines - the portion of the service line extending from the Curb Stop to the meter or one foot inside a building foundation, whichever is farther (Customer-owned service line). The Customer-owned service line is owned by the customer. Generally, any replacement of the Customer-owned service line is the responsibility of the customer and not included in this LTIIP. However, Customer-owned service lines are included in this LTIIP only for purposes of the LSLR Plan and the replacement of Customer-owned service lines made of lead materials. The Customer-owned service lines vary in size from 6-inch down to ¾-inch with a majority of Customer-owned service lines being constructed of copper. A small portion of Customer-owned service lines may be made of lead. Copper or plastic is used when Customer-owned service lines are replaced

pursuant to the LSLR Plan. The Company has identified approximately 12,115 Customer-owned service lines across all three rate districts. The Company estimates the total number of Customer-owned LSLs that need to be replaced to be less than 400. CWC plans to identify, at a minimum, a cumulative average of 10.0% of the initial unknown service materials annually by means of utilizing existing records, modeling, statistical analysis, and mechanical excavation.

Table 1 provides a breakdown of eligible property by type, not including the property eligible for replacement under the LSLR Plan. Table 2 provides a breakdown of the water main by size. Table 3 provides a breakdown of eligible property for the LSLR Plan. Table 5 provides a breakdown of the company side and customer side service line materials eligible under the LSLR Plan by material.

Table 1 – Types and Age of Eligible Property

Property Type	Quantity***	Age (Year)
Water mains **	722,890 LF	1875 - 2023
Company-owned service lines	10,407 EA	1875 - 2023
Valves	3,535 EA	1875 - 2023
Hydrants	978 EA	1875 - 2023
Meters	10,407 EA	1990 - 2023

** - less than 2% of all water mains were installed prior to 1900.
*** - does not include the East Donegal Rate District.

Table 2 – Quantity of Water Mains by Size

Water Main Diameter (inches)	Quantity (Linear Feet)**
4	7,550
6	143,650
8	311,050
10	52,200
12	195,000
16	13,100
36	340
TOTAL	**722,890**

** - does not include the East Donegal Rate District.

Table 3 – Types and Age of Eligible Property Under the LSLR Plan

Property Type	Quantity**	Age (Year)
Company-owned service lines	12,051 EA	1875 – 2023
Customer-owned service lines	12,050 EA	1875 - 2023

** - only eligible to the extent the service lines are made of lead materials.

Table 4 – Company-Side and Customer-Side Service Lines Eligible Under the LSLR Plan by Material

Company Side Material		Customer Side Material	
Lead	4	Lead	1
Copper	4,297	Copper	2,135
Unlikely Lead	4,560	Unlikely Lead	5,103
Unknown	3,173	Unknown	4,807
Likely Lead	1	Likely Lead	1
Other	16	Other	3
TOTAL	12,051	TOTAL	12,050

Section 2 – Schedule for Planned Replacement of Eligible Property

CWC understands the importance and benefits of continuous renewal of aging infrastructure to continue to provide safe and reliable service to our customers. This section provides an overview of the planning process for replacing aging water distribution system infrastructure and Company-owned and Customer-owned LSLs. This section does not discuss the planning process for new water main extensions or for improvements to treatment, storage and pumping facilities since they are not DSIC eligible.

Many components must be evaluated and weighted when determining which infrastructure to replace in a given year. In general the following components, in order of priority, are used to select infrastructure to replace each year:

- Planned state highway improvements;
- Planned municipal street improvements;
- Planned large scale improvements by other utilities;
- Water main break frequency;
- Age;
- Material quality; and
- Installation quality.

The first three items are given the highest priority since CWC has little to no influence on the scheduling of work by outside entities. CWC understands the significant benefit to the customers and municipalities when infrastructure is replaced and/or improved concurrently with other public infrastructure work. CWC meets at least annually with the municipalities in which it serves public water to coordinate the replacement of water system infrastructure with planned street upgrades. This directly reduces the cost to the Company and thus, to customers, by providing for less construction work and expense to replace these lines.

With respect to material quality, the Company will prioritize the replacement of services lines made of lead materials. These projects will be prioritized based on targeted sensitive populations as defined by the Environmental Protection Agency (EPA) and the Pennsylvania Department of Environmental Protection (PADEP), which includes areas with elevated levels of lead in tap water, areas with high concentrations of lead service lines, and/or areas of the distribution system which have elevated corrosion rates. A list of sensitive populations has also been developed to determine the service line materials. The list includes schools, nursing homes, large apartment buildings, churches, and industries. These service lines have been or will be detailed as sensitive populations in the Service Line Inventory. Homes with multiple meters and multiple family residents will also be prioritized to determine service line material.

Lead materials will be identified through four methods: (1) in combination with main replacements, (2) through mechanical excavation, (3) through customer self-surveys, and (4) emergency repairs, as set forth below:

> *In Combination with Main Replacements* - As part of its broader LTIIP efforts, Columbia Water will analyze record-reviews of old age mains within the oldest parts of the distribution system to determine which water mains in the distribution system should be replaced. Prior to choosing a LSLR Project Area, the Company's distribution crew will review records and/or physically inspect a portion of the service lines within a proposed area to gauge the likelihood of lead within that area. Coordination with municipalities will take place to minimize costs and minimize impacts on roads and neighborhoods. Once the LSLR Project Areas are determined, the projects will be posted on the Columbia Water website at least six (6) months in advance of the work being done. Prior to the work being initiated, Columbia Water staff will reach out to the customers to determine all service line materials within the affected area, and to provide the customers with detailed information regarding the routine procedures and the potential health risks involved.
>
> *Mechanical Excavation* - Areas with a higher likelihood of having lead service lines will be prioritized for these projects. Columbia Water will physically excavate the service lines

to determine material types. If a service line is determined to be lead, coordination will occur with the customer(s) and the property owner to have the service line replaced.

Customer Self-Surveys - Columbia Water will reach out to the customers with lead, galvanized requiring replacement, or unknown service lines. Customers who discover a lead service line may call and schedule to have their service line replaced. CWC will schedule to replace customer-owned lead service lines. If the company side is lead, it will be replaced at the same time with the customer side. These replacements will occur as discovered.

Emergency Repair - If a lead service line is leaking or otherwise defective at the time it is discovered, CWC will replace the lead service line in accordance with its tariff. Columbia Water staff will maintain the proper equipment and tools necessary for emergency service line replacements. If a lead service line is discovered during an emergency but is not leaking, the replacement of the line will be scheduled for replacement at a later date.

The Company plans to undertake repair and replacement of its system components in the following manner:

Water main replacement – Work normally entails full replacement of the water main (as opposed to rehabilitate) since this option eliminates long-term structural and integrity deficiencies that remain when a water main is simply rehabilitated. Further, this option is also considerably less disruptive to the customer since the new main can be installed, tested and placed into service before moving service lines from the old main to the new main. Disruption of water service is minimal since the customer is without service during their service line switch over only. In areas where considerable construction or restoration costs would be incurred to replace a water main, rehabilitation of the existing main is pursued.

Valve and hydrant replacement – Work normally involves the full replacement of the valve and hydrant. Occasionally a relatively new valve or hydrant will be rebuilt and/or reused but only in those situations where the reliability and integrity are well known. Valves and hydrants normally get replaced at the same time a water main is being replaced or rehabilitated. There are times when critical valves and hydrants are replaced independently of a full scale water replacement project. Properly operating valves greatly benefit the customers since it minimizes the geographic area impacted by a main repair and minimizes the amount of time needed to make a repair. A schedule of valve and hydrant replacements is provided in Table 5.

Company-Owned Service line replacement – Work normally involves the full replacement of the company-owned service line between the water main and the curb stop. The work will include replacement of the curb stop and curb box. Company-owned service lines get replaced during full scale water replacement projects or if the Company determines they otherwise need to be replaced due to conditions including but not limited to leaks or malfunction.

Meter replacement or repair– Residential and commercial meters normally involve full replacement. Some commercial and industrial meters can be rehabilitated. Meter replacement is typically based upon meter age. CWC replaces its meters in compliance with the schedule in the Commission's regulation at 52 Pa. Code § 65.8. Accelerated replacement of meters will benefit customers directly through more accurate meter readings.

Lead service line replacement – Work involves replacing Company-owned and Customer-owned LSLs using existing routes through a combination of pipe splitting and/or pipe pulling. This approach removes or displaces existing pipe while simultaneously replacing it with a new pipe and is the preferred method under normal circumstances. Columbia Water may also utilize guided boring to install new pipe along a different route or using open trench excavation to remove replace the pipe. The appropriate replacement technique will depend on a combination of many site-specific characteristics, including, but not limited to, time constraints, soil characteristics, depth to ground water or rock, depth of road foundation, condition of the service line, proximity of other utility services (e.g., electric, gas, cable, sewer, storm water), site conditions (e.g., access, parking, paving, landscaping, overhead obstructions), pipe conditions (e.g., length of pipe, pipe diameter and wall thickness, bury depth, configuration, and repair history, and conditions inside the home like a finished basement with limited access to the water meter and plumbing. All new pipe installation will be copper or plastic.

Section 3 – Location of Eligible Property

All of the CWC's eligible property is located in Lancaster and York Counties, Pennsylvania. More specifically, the property is located in the boroughs of Columbia, Marietta and Mountville and in portions of the townships of West Hempfield, East Donegal, Hellam and Manor. See Figure 1 for additional details.

Areas with Company-owned and Customer-owned LSLs are more specifically found on houses built prior to 1950 with water mains older than 1970 within Columbia Borough and Marietta Borough. Though lead service line materials may be found in Mountville Borough and in portions of the townships of West Hempfield, East Donegal, Hellam and Manor. See Figure 1 for additional details.

Section 4 – Estimate of the Quantity of Eligible Property to be Replaced

Table 5 identifies eligible property that is projected to be replaced in the next five years. These quantities were prepared based upon the best available information (planned municipal and utility projects, main break data, pipe age, etc.) at the time this plan was prepared. Actual quantities may vary depending on conditions that could change in the distribution system or changes made by the municipalities to their street projects.

Table 5 – Projected Quantities of Eligible Property to be Replaced for 2023 - 2027

Year	Water Main (LF)	Service lines (ea.)	Valves	Hydrants	Meters
2023	1,200	30	5	3	140
2024	1,200	50	5	3	140
2025	1,200	50	5	3	140
2026	1,200	50	5	3	140
2027	1,200	50	5	3	140

Prior to 2024, the LTIIP contained 30 service line replacements. The Company-owned service lines being replaced were primarily made of lead materials. The Company is now planning to undertake 50 service line replacements, which includes replacing Company-owned and Customer-owned LSLRs, on an annual basis beginning in 2024.

Section 5 – Projected Annual Expenditures

The projected annual expenditures for the 2023 to 2027 period are listed in Table 6 below. These estimates are based upon the quantities listed in Table 5 and recent construction costs. A break down by category is provided in Table 7.

Table 6 – Projected Annual Expenditures for 2023 - 2027

Year	Projected Annual Expenditures
2023	$280,000
2024	$380,000
2025	$380,000
2026	$380,000
2027	$380,000

Table 7 – Projected Annual Expenditures by Category for 2023 - 2027

Year	Water Main	Service Lines	Valves	Hydrants	Meters	Total
2023	$160,000	$45,000	$15,000	$10,000	$50,000	$280,000
2024	$160,000	$145,000	$15,000	$10,000	$50,000	$380,000
2025	$160,000	$145,000	$15,000	$10,000	$50,000	$380,000
2026	$160,000	$145,000	$15,000	$10,000	$50,000	$380,000
2027	$160,000	$145,000	$15,000	$10,000	$50,000	$380,000

Prior to 2024, the Company was already investing $45,000 into replacing primarily Company-owned service lines made of lead. The Company is committing to an additional $100,000 for a

total of $145,000 for Company-owned and Customer-owned LSLRs beginning in 2024. For all projects, the most prudent, cost-effective methods will be used to complete the project. Almost all eligible property is abandoned in place after the replacement infrastructure is installed and therefore is not salvageable. Meters can be salvaged and are sold at local salvage yards.

Section 6 – Acceleration of Infrastructure Replacement

CWC has a track record of investing in its infrastructure to maintain safe and reliable service to all of its customers including infrastructure not eligible for DSIC. Over the past 5 years considerable investment has occurred in major upgrades of its water system including a system-wide security system, four (4) emergency generators, repainted two tanks, and installing a new intake in the Susquehanna River. In addition CWC purchased an adjacent water system that was being operated by part-time contractors.

In addition to the capital expenditures listed above, CWC, through the use of its DSIC, continued to replace water mains, Company-owned service lines, valves, hydrants and meters. Figure 2 graphs the projected and historical DSIC eligible capital expenditures. With the completion of the large projects listed above, additional capital will be directed towards expediting infrastructure replacement.

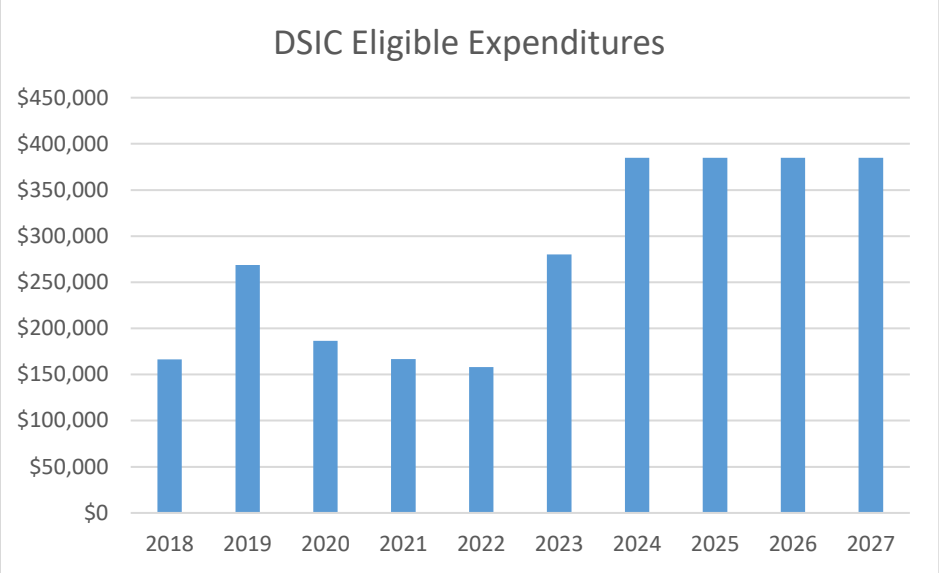

Figure 2 – Projected and Historic DSIC Eligible Expenditures

The projected DSIC eligible expenditures will accelerate the replacement of infrastructure by approximately 80 percent. Moreover, through the Company's LSLR Plan, the Company will make

a concerted effort to replace existing LSLs in a timely manner within the time frame set forth in 52 Pa. Code § 65.53(a). The LSLR Plan will take place in conjunction with Columbia Water's other infrastructure investments.

Section 7 – Workforce Management Plan and Training

To ensure system reliability, public safety, quality installation and cost-effectiveness, all DSIC eligible projects will be constructed by qualified personnel. CWC uses a competitive bidding process for the purchase of piping, valves and hydrants. A list of materials is prepared for the project and sent to the four (4) major pipe suppliers for price quotes. CWC utilizes its own staff and equipment for the installation of water mains, Company-owned service lines, Customer-owned service lead service lines, valves, hydrants and meters. Company employees utilized for this type of work have extensive training in the use of heavy equipment, pipe laying procedures, disinfection procedures and safety training. For water mains greater than 12-inches in diameter, stream crossings or expedited Pa DOT projects, CWC uses qualified local contractors for water main, valves and hydrant installations. These local contractors are prequalified based upon experience with similar projects, safety record, and qualifications of personnel. All project sites are inspected regularly throughout the construction process by Company personnel.

Section 8 – Outreach and Coordination with other Utilities

CWC meets annually, and often times more frequently, with the municipalities where it provides pubic water service to coordinate the replacement of water main with the reconstruction and/or repaving of streets and roadways. These meetings often times include the other utilities serving the same areas. CWC coordinates its replacement projects to coincide with other planned roadway and utility work. PaDOT is very effective at notifying utilities well ahead of planned state highway projects making coordination of the work an easy process. In each of the municipalities where CWC provides public water service, public officials have a strong record of planning street projects far enough in advance to allow each of the major utilities to upgrade facilities as necessary.

For each project, CWC coordinates all work with the state or local municipality through planning meetings and the permitting process. In addition, CWC utilizes the PA One Call system to minimize utility conflicts and notifies customers of proposed work with door hangers throughout the construction process.

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;
Docket No. P-2023-3041845

COLUMBIA WATER COMPANY'S RESPONSES TO DATA REQUESTS OF THE BUREAU OF TECHNICAL UTILITY SERVICES

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 LTIIP) 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 LTIIP to replace each instance of the term "targeted area" with the term LSLR project area.

RESPONSE:

The term "targeted area" is the same as the term LSLR project area as defined in 52 Pa. Code § 65.52. The LSLR materials have been revised to use the term "LSLR project area." See attachments provided in response to P-1.

PROVIDED BY: Taz Keyser

DATE: 9/13/2023

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;
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COLUMBIA WATER COMPANY'S RESPONSES TO DATA REQUESTS OF THE BUREAU OF TECHNICAL UTILITY SERVICES

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.

RESPONSE:

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. The method(s) Columbia Water will use to make this contact is by phone, email, door hanger, and/or in-person.

PROVIDED BY: Taz Keyser

DATE: 9/13/2023

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;
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COLUMBIA WATER COMPANY'S RESPONSES TO DATA REQUESTS OF THE BUREAU OF TECHNICAL UTILITY SERVICES

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.

RESPONSE:

The service line inventory has already been integrated into the GIS system. The integration was completed in August 2023.

PROVIDED BY: Taz Keyser

DATE: 9/13/2023

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;
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COLUMBIA WATER COMPANY'S RESPONSES TO DATA REQUESTS OF THE BUREAU OF TECHNICAL UTILITY SERVICES

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.

RESPONSE:

An online interactive map will be provided for customers to have the ability to determine if an LSL may exist at the customer's property. This interactive map will be available to the customers within 180 days of the LSL Plan being approved by the PUC.

PROVIDED BY: Taz Keyser

DATE: 9/13/2023

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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.

RESPONSE:

a. The PaDEP provided Columbia Water Company with the attached document, titled, "Minimum Service Line Material Verification Requirements". This document provides instructions on how to define service line classification by excavating 20% of the service lines installed within a similar timeframe and/or development. If a service line has been defined by this method, it will be classified as "B) Modeling/statistical analysis" under either the System-Owned or Customer-Owned Basis for Material Classification, Non-Field column.

b.

Estimated Average Cost to Excavate a Service Line for Inspection				
Permit (if necessary)	Equipment	Labor	Restoration	Total
$0.00 - $25.00	$350.00	$350.00	$100.00 - $300.00	$800.00 - $1,025.00

To complete the inventory, Columbia Water needs to define approximately 7,500 service lines. It is estimated that of those 7,500 service lines, roughly 2,500 can be defined by record review only. The remaining 5,000 service lines will be defined by modeling/statistical analysis. 20.0% of 5,000 service lines over a 10-year period equals 1,000; therefore, the projected annual expenditure to complete the service line inventory activities over the next 10 years is $80,000-$102,500 in 2023 dollars.

PROVIDED BY: Taz Keyser

DATE: 9/13/2023

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;
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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.

RESPONSE:

As a general matter, the Company will use all reasonable efforts to contact a non-responsive landlord to avoid having to exercise the Company's step-in rights. If a landlord contacts the Company and refuses the lead service line replacement, the Company will not exercise its step-in rights and will complete the termination procedures as set forth in its Pro Forma Tariff.

Where a landlord is non-responsive, the Company, in its sole discretion, will exercise step-in rights where there is reasonable evidence of imminent risk to the public health or safety of the tenants, including, but not limited to, elevated lead levels at the tap and/or the residents being classified as a sensitive population, and such replacement is necessary to uphold the Company's provision of safe and reasonable service in accordance with Section 1501 of the Public Utility Code, 66 Pa. C.S. § 1501. *See Implementation of Chapter 32 of the Public Utility Code Regarding Pittsburgh Water and Sewer Authority - Stage 1 Petition of Pittsburgh Water and Sewer Authority for Approval of Its Long-Term Infrastructure Improvement Plan*, Docket Nos. M-2018-2640802, 2021 WL 431971, at *18-20 (Opinion and Order entered Feb. 4, 2021); *see also* 52 Pa. Code § 65.58(c)(3) ("An entity may establish a process to address replacement of a customer-owned LSL to avoid termination of service when a property owner who is not the customer is nonresponsive to an entity's offer to replace a customer-owned LSL.").

Moreover, the Commission clearly has the legal authority and duty to approve tariffs with rules and regulations for replacement of lead service lines. 66 Pa. C.S. §§ 501, 1311, 1501. Once the PUC approves a tariff it has the force and effect of law. *Brockway Glass Co. v. Pa. Pub. Util. Comm'n*, 437 A.2d 1067, 1070 (Pa. Cmwlth. 1981). Thus, through approval of the provisions of Columbia Water's tariff allowing Columbia Water to step into a landlord's shoes in these circumstances, the Commission will specify the legal authority pursuant to which the Company is acting.

PROVIDED BY: Counsel

DATE: 09/13/2023

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;
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COLUMBIA WATER COMPANY'S RESPONSES TO DATA REQUESTS OF THE BUREAU OF TECHNICAL UTILITY SERVICES

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.

RESPONSE:

See the attached excel file titled, "Service Line Inventory – 8-31-2023" for the current inventory. DEP updated their process for public water systems to submit their lead service line inventory on August 2nd, 2023. As a result of this change, Appendix L, of the LSL Plan has been updated accordingly and is attached.

PROVIDED BY: Taz Keyser

DATE: 9/13/2023

L. SERVICE LINE INVENTORY LEGEND AND INSTRUCTIONS

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SAFE DRINKING WATER

INSTRUCTIONS FOR EXPORT OF USER DATA

Introduction: The Department has developed a procedure whereby a system with an extant service line inventory database may export their data in a specified format, then submit it to the Department for import into the Department's PA SLI spreadsheet.

Using this procedure yields numerous advantages for both the Department and the System:

- The user does not need to determine/report the Service Line Classification or Sampling Tier. This will be done automatically when the data are imported into the spreadsheet.
- The spreadsheet will also automatically determine if sufficient evidence has been provided for the SL Class determination of Non-Lead.
- The spreadsheet allows the user to take advantage of the built-in csv export function for purposes of uploading results to the Department via DWELR.
- Information submitted by the Systems will be consistent regardless of whether the data were entered directly into the PA SLI spreadsheet or imported, resulting in fewer data gaps and fact-checking for Department personnel. The System also benefits from reduced fact checking.

Use: The system must provide an export file in a format that is compatible with import into Excel, for example Excel spreadsheet or csv file.

- The export file must contain the fields noted below, in the same order, with blanks or nulls in empty fields to maintain the order.
- Not all fields require a response, but a blank or null must be used in non-responsive fields to maintain the correct order.
- The System is encouraged to submit test data before finalizing their export procedure to ensure that it is compatible with the Department's requirements for import.

Procedure: Once the System has completed their initial inventory and is ready to submit:

- Email the export file to ra-padwis@pa.gov. In the subject field include the PWSID number (only one PWSID per submission) and the words "for import into PA SLI".
- In the same email, also submit the cover form 3930-FM-BSDW0042b, available on e-Library. Instructions for completion of the cover form are also available on e-Library as document number 3930-FM-BSDW0042.
- In the body of the email, for Community Water Systems, indicate if ≥ 20% of the structures served are multi-family residences.
- Department staff will enter the cover form information, import the export file, and return the completed PA SLI spreadsheet to the System.

  - IMPORTANT NOTE: Errors may be identified during the import procedure. For example, duplicate addresses or insufficient evidence for a determination of Non-Lead.
  - If errors are found, the spreadsheet to the System will NOT include the erroneous entries. The errors must be fixed by the System.
    - If there are only a few errors, those entries can be manually entered into the PA SLI spreadsheet by the System.
    - If there are many errors, it is suggested to make the corrections in the System's database and create another export file (preferably containing only the erroneous entries), then send the spreadsheet and corrected export file back to the Department for re-import.
- Once the completed, error-free spreadsheet is received by the System, follow the "create export" procedure for csv file export located on the "Introduction" tab of the completed PA SLI spreadsheet and upload via DWELR. Instructions for upload to DWELR will be provided once the interface is active.
  - Users must have a DWELR account to upload the SLI.
  - Users can upload the SLI with either an L or P DWELR account.
  - If the exported csv file is very large, another mechanism for upload may be necessary. This will be detailed in the instructions once the interface is active.

Required Fields:

The user export file must contain 38 columns or fields in the following order. Headers may be included or not.

- Important: Note that the designation "optional" does not mean the field can be omitted, just that it is not required to have a response in that field. The export file must always have 38 fields.

Basic information:

1. Service line classification {LEAVE EMPTY}
2. Sufficient evidence for determination of non-lead {LEAVE EMPTY}
3. LCRR sampling tier {LEAVE EMPTY}
4. {LEAVE EMPTY}
5. Unique service line ID (Required)
6. Record type (Required; Default answer = Initial)
7. Date replacement completed (Leave blank for initial inventory, used for updated inventory only)
8. Ownership type (Required)
9. Street address 1 (Required)
10. Street address 2 (Optional)

11. City or township (Required)
12. Zip code (Required)
13. School? (Default answer = No)
14. Childcare facility? (Default answer = No)

Questions related to System-Owned side (Leave blank if ownership type is Customer):

15. Material (Required)
16. Was material ever previously lead? (Default answer = Yes)
17. Lead pigtails, goosenecks or connectors present upstream? (Default answer = Yes)
18. Installation date range (Required)
19. Installation date specific (Optional)
20. Diameter in inches (Required)
21. Basis of material Classification 1 – Non-Field (Optional)
22. Basis of material classification 2 – Non-Field (Optional)
23. Basis of material classification 3 – Field (Optional)
24. Date of field verification (Required if 23 is answered)
25. Additional comments (Required if "other" is selected for 21, 22 or 23)

Questions related to Customer-Owned side (Leave blank if ownership type is System):

26. Material (Required)
27. Lead pigtails, goosenecks or connectors present upstream? (Default answer = Yes)
28. Installation date range (Required)
29. Installation date specific (Optional)
30. Basis of material Classification 1 – Non-Field (Optional)
31. Basis of material classification 2 – Non-Field (Optional)
32. Basis of material classification 3 – Field (Optional)
33. Date of field verification (Required if 32 is answered)
34. Additional comments (Required if "other" is selected for 30, 31, or 32)

Questions related to Sampling Tier:

35. Service line connected to: (Required)
36. POE treatment present? (Required)
37. Interior building plumbing contains lead solder? (Required)
38. Current LCR sampling site (Required)

Acceptable Responses (by field number listed above):

1, 2, 3, 4. Leave these fields blank.

5. Response required in this field.
   - May contain up to 30 characters

- Can use letters and/or numbers in any combination
- Use only uppercase letters; lowercase letters will be converted to uppercase
- Can use hyphen (-), underscore (_), period(.)
- May not use spaces, commas or other special characters (i.e., *, !, @, etc.)

6. Response required in this field. Acceptable responses are (I, U, A, D)
   - Initial (I): Use this designation for the initial inventory submitted on or before October 16, 2024
   - Update (U): Use this designation when submitting an updated inventory, to indicate the record is being revised
     - If the update is due to a service line replacement, enter the replacement date in field 7
   - Add (A): Use this designation to add service lines to an existing inventory
   - Inactive (D): Use this designation to indicate a record is being inactivated. Records cannot be deleted.
     - Example: Property was made into a parking lot and the service line was decommissioned.
     - Add a text comment explaining the reason for inactivation in fields 25 and/or 34.

7. Field may be left blank.
   - For the initial inventory this field MUST be blank.
   - Use MM/DD/YYYY format.

8. Response required in this field. Acceptable responses are (J, S, C)
   - Joint (J)
   - System (S)
   - Customer (C)

9 - 12. Response required in this field.
   - Each SLID must be associated with a unique address.
   - Duplicate addresses are not allowed.
   - For the zip code, use 5-digits (not 5 + 4).

13. Response required in this field. Acceptable responses are (N, YE, YS, YA).
    Default answer = N

- A school (YA) is "any building associated with public, non-public/private, or charter institutions that primarily provides teaching and learning for elementary or secondary students."
- An elementary school (YE) contains students in grades up to and including grade 8 (includes pre-school).
- A secondary school (YS) contains students in grades no less than 9 and no greater than 12.

14. Response required in this field. Acceptable responses are (N, Y). Default answer = N
    - A child care facility is "a location that houses a licensed provider of child care, day care, or early learning services to children as determined by the State licensing agency."

15 & 26. Response required in this field. Acceptable responses are (A, B, C, D, E, F, G, H, J, K, L, M, O, P, Q, R, S).
- Lead (A)
- Lead-lined galvanized (B)
- Galvanized (C)
- Copper (D)
- Cast iron – lined (E)
- Cast iron - unlined (F)
- HDPE - high density polyethylene (G)
- PVC - polyvinyl chloride (H)
- CPVC - chlorine treated PVC (J)
- PEX - cross-linked polyethylene (K)
- ABS - acrylonitrile butadiene styrene (L)
- PB – polybutylene (M)
- Asbestos cement (O)
- Other non-lead material (P)
- Unknown - Likely Lead (Q)
- Unknown - Unlikely Lead (R)
- Unknown (S)

16, 17 & 27. Response required in this field. Acceptable responses (Y, N, S). Default answer = Yes
- Yes (Y)
- No (N)
- Not sure (S)

18 & 28. Response required in this field.
Acceptable responses are (A, B, C, D, E, F, G, H, J, K, L, M, O, P)
– Pre-1901 (A)
– 1901 – 1910 (B)
– 1911 – 1920 (C)
– 1921 – 1930 (D)
– 1931 – 1940 (E)
– 1941 – 1950 (F)
– 1951 – 1960 (G)
– 1961 – 1970 (H)
– 1971 – 1980 (J)
– 1981 – 1990 (K)
– 1991 – 2000 (L)
– 2001 – 2010 (M)
– 2011 – 2020 (O)
– 2021 – 2030 (P)

19 & 29. These fields may be left.
- Use these fields to enter more specific installation date information for the service line, if available.
- Can be entered in any format including text and partial dates.

20. Response required in this field.
- Enter the diameter in inches.
- Format as a number with 2 decimal places.

21, 22, 30 & 31. These fields may be left blank but will affect the determination of sufficient evidence for non-lead! Acceptable responses are ({EMPTY}, A, B, C, D).
- Records review (A)
- Modeling/statistical analysis (B)
- Water sampling (not allowed for systems with corrosion control treatment) (C)
- Other (must enter comments in fields 25 and/or 34) (D)

23 & 32. These fields may be left blank but will affect the determination of sufficient evidence for non-lead! Acceptable responses are ({EMPTY}, E, F, G, H, J, K, L).
- Visual inspection at existing access point (E)
- CCTV inspection inside pipe, full length (F)
- CCTV inspection outside pipe, at curb box (G)
- Mechanical excavation, 1 location (H)

- Mechanical excavation, 2 locations (J)
- Mechanical excavation, 3+ locations (K)
- Other (must enter comment in fields 25 and/or 34) (L)

24 & 33. Response required in this field IF fields 23 or 32 are not {EMPTY}. Otherwise this field may be left blank.

- Date must be entered in MM/DD/YYYY format
- Date must be BEFORE than the initial inventory date recorded on the Cover Form (3930-FM-BSDW0042b)

25 & 34. Response required in this field IF responded "D" (other) in fields 21, 22, 30 or 31 OR responded "L" (other) in fields 23 or 32.

- Free form text field
- Character limit = 250

35. Response required in this field. Acceptable responses are (S, M, O).

- Note: An error will occur if the CWS does not indicate whether ≥ 20% of structures served are multi-family residences.
- Single family residence (S). One service line provides drinking water for one family.
- Multi family residence (M). One service line provides drinking water for multiple families (e.g., apartment complex where there is only a single service line).
- Building/Other (O). If the service line cannot be categorized as S or M, choose O.

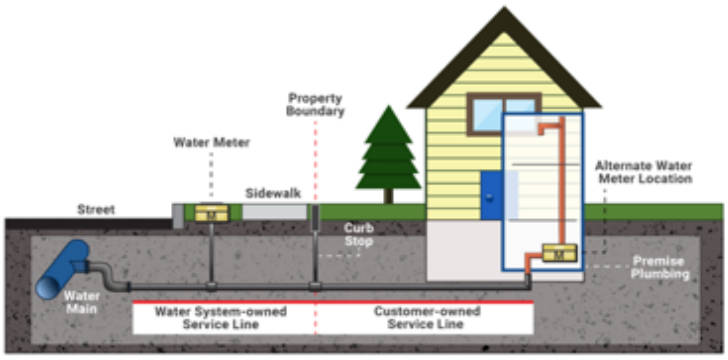
36 & 37. Response required in these fields. Acceptable responses are (Y, N, S). Default answer = Not sure

- Yes (Y)
- No (N)
- Not sure (S)

38. This field may be left blank. Acceptable responses are ({EMPTY}, Y, N)

Determination of Service Line Classification

Service Line Designation Where Ownership Is Split Between the Water System and Customer



NOTE: The classification of a service line applies to the entire length of the service line, regardless of ownership.

System-Owned Portion Material Type	Customer-Owned Portion Material Type	Service Line Classification[2,3,4,5]
Lead or lead-lined	Any material	*Lead*
Any material	Lead or lead-lined	*Lead*
Unknown	Any material but lead or lead-lined	*Lead Status Unknown*
Any material but lead or lead-lined	Unknown	*Lead Status Unknown*
Any material but lead, lead-lined, galvanized, or unknown	Any material but lead, lead-lined, galvanized, or unknown	*Non-Lead*[1]

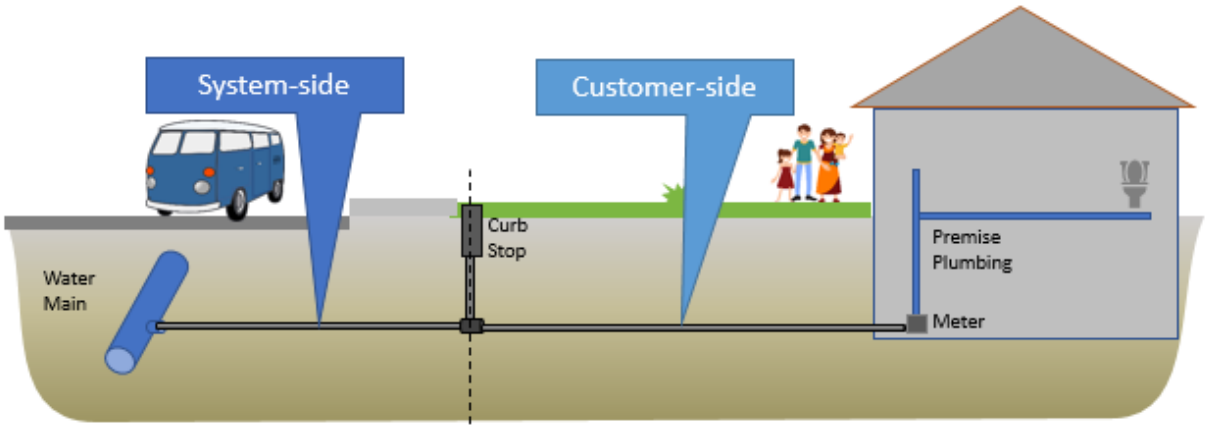
System-Owned Portion		Customer-Owned Portion		
Lead Connector Upstream?	Material Type	Lead Connector Upstream?	Material Type	
No	Any material but lead, lead-lined, or unknown	No	Galvanized	*Non-Lead*
No	Galvanized	No	Any material but lead, lead-lined, or unknown	*Non-Lead*
No	Galvanized	No	Galvanized	*Non-Lead*
No	Not previously lead	No	Galvanized	*Non-Lead*
Yes or Not sure	Galvanized	Any response	Any material but lead, lead-lined or unknown	*Galvanized Requiring Replacement*
Yes or Not sure	Any material but lead, lead-lined or unknown	Any response	Galvanized	*Galvanized Requiring Replacement*
No	Any material but lead, lead-lined or unknown	Yes or Not sure	Galvanized	*Galvanized Requiring Replacement*
Any response	Previously lead or unsure if previously lead	Any response	Galvanized	*Galvanized Requiring Replacement*

[1]Any determination of Non-Lead is subject to review and approval by the Department.
[2]It is only necessary to replace the portions of the service line that are Lead or Galvanized Requiring Replacement.
[3]When both portions of the service line are Lead or Galvanized Requiring Replacement, both portions must be replaced at the same time. Partial replacements are not allowed.
[4]If either portion of the service line is classified as Lead Status Unknown, it must be replaced unless further investigation changes the classification to Non-Lead. The change in classification must be submitted to the Department in the Updated Inventory.
[5]The presence of lead connectors, goosenecks or pigtails is only relevant to the determination of Galvanized Requiring Replacement.

Evidence Required for Non-Lead Designation

To categorize pipe material as non-lead (e.g. copper), the water system is expected to show sufficient evidence through one of the "stand-alone" verification options, or a combination of 2 or more other methods as described below.

Note: For systems that own a portion of the service line, such as shown below, the pipe material for both the customer and system portions must be identified.



"Stand-Alone" Records Method Options: The following options do not need to be combined with another method to verify a pipe is non-lead:

- Records indicating service line installation/replacement date after January 6, 1991 (the effective date of the PA Lead Ban)
  -OR-
- Record of a local ordinance prohibiting lead service line installation and water system records indicating service line installation/replacement after the ordinance effective date.

Combination of Two (or more) Other Methods: If water system records do not meet either of the stand-alone criteria above, the system may use any TWO other investigation techniques from the list below:

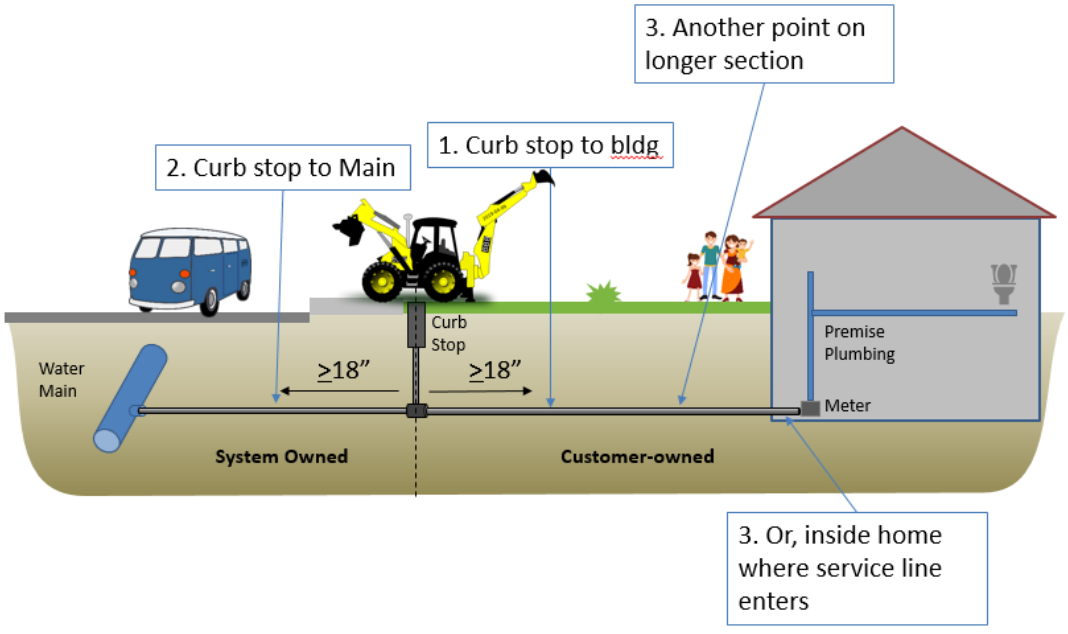
- Records review
- Modeling/Statistical analysis
- Water sampling (5th liter sampling, if system does not have corrosion control treatment)
- Field verification, options include*:
  - Visual inspection at existing access point (This includes any access points in which the material type can clearly be determined, such as a meter pit, or the service line entry to the basement at the customer side)
  - CCTV inspection outside pipe – at curb box
  - Mechanical excavation at a location along each half of the service line (i.e. customer-side and system-side)

* **Representative Field Verification:** Note that if a system is verifying records using a field method, a statistically sound subset of service lines can be field verified, rather than every line. Systems should follow the procedure established in the Michigan EGLE "Minimum Service Line Material Verification Requirements" document. This method should only be used for a homogeneous area, such as a residential neighborhood in which the houses were built in the same time period.

- Other method reviewed by DEP

"Stand-Alone" Field Method Options: If a system does not have any records, then there are two stand-alone field method options. Use ONE of the following verification methods:

- Internal CCTV inspection over the full length of the service line
  – OR -
- Mechanical excavation in at least 3 locations over the length of the service line as follows (visual below):
  - Curb stop to building:
    - A minimum of 18 inches from the curb stop
    - Or, if the distance to the building is less than 18 inches, halfway to the building
  - Curb stop to water main:
    - A minimum of 18 inches from the curb stop
    - Or, if the distance to the water main is less than 18 inches, halfway to the main
  - Third point (choose one):
    - Inside the home where the service line enters (inspected by water system personnel, not customer)
    - A second excavation point in the longer section of service line that is at least halfway between the first point and the building or water main
  - Special note: If the system has sufficient evidence for one portion of a jointly-owned line, then only 2 mechanical excavation locations are required in the other portion of the service line.



Regulatory Q & A – Inventory Requirements of the LCRR

Question	Answer	Regulatory Citation(s)
1. Who must prepare a service line inventory?	All community water systems (CWSs) and non-transient non-community water systems (NTNCWSs).	40 CFR §141.84(a)
2. What material classification should I use?	Service lines must be classified as one of four types: – Lead, – Galvanized Requiring Replacement (GRR), – Non-Lead, (specify the actual material such as copper or plastic), or – Lead Status Unknown. Where the material is unknown, EPA recommends that systems use subclassifications to capture additional information (e.g., unknown - unlikely lead).	40 CFR §141.84(a)(4) & §109.706
3. What if the service lines in my system are split ownership, meaning that my system owns a portion and the customer owns a portion?	The inventory must include both the system-owned and customer-owned portions of the service line; however, systems must count each service line from the water main to the interior building plumbing only once for determining the number of service lines requiring replacement, assigning a tap sample tiering classification, and facilitating reporting of inventory information to the State and EPA. Refer to the "Class & Tier Info" section below for information on how to classify service lines that have split ownership.	40 CFR §§141.84(a)(2) & (a)(7)(i)
4. What information should I use to identify service line material and prepare my inventory?	You **must** use previous materials evaluation, construction and plumbing codes/records, water system records, distribution system inspections and records, information obtained through normal operations, and state-specified information to prepare your inventory. EPA recommends systems consider additional service line investigation methods such as visual inspection, water quality sampling, and excavation.	40 CFR §§141.84(a)(3) & (a)(5)
5. When is the initial inventory due?	October 16, 2024	40 CFR §141.80(a)(3)[1]
6. What if I have no Lead, Galvanized Requiring Replacement (GRR), or Lead Status Unknown service lines?	You have some different requirements that are explained in the answers to questions 7, 8, and 9.	N/A

Question	Answer	Regulatory Citation(s)
7. Do I need to update my inventory?	**For systems with Lead, GRR, or Lead Status Unknown service lines** The service line inventory should improve over time with better information. You **must submit inventory updates** to your state on the following frequency: (1) Annually if you conduct lead tap sampling semi-annually or annually. (2) Triennially (i.e., once every 3 years) if you conduct lead tap sampling triennially. **For systems with only Non-Lead service lines** You are not required to provide an update. However, if you subsequently find any Lead, Galvanized Requiring Replacement or Lead Status Unknown service lines, you **must** notify the State within 30 days and prepare an updated inventory on a schedule established by the State.	40 CFR §141.90(e)(3)
8. Do I need to make my information publicly available?	**For systems with Lead, GRR, or Lead Status Unknown service lines** You must make the inventory publicly available and include a locational identifier for lead service lines and GRR. Water systems serving more than 50,000 people must provide inventories on-line. **For systems with only Non-Lead service lines** You can provide a written statement, in lieu of the inventory, that your distribution system has no lead or GRR service lines along with a general description of all applicable sources used to make that determination.	40 CFR §§141.84(a)(8) & (a)(9)
9. Do I need to include a statement in my Consumer Confidence Report (CCR)?	**For systems with Lead, GRR, or Lead Status Unknown service lines** CWSs must indicate how the public can access the service line inventory information in their CCR. **For systems with only Non-Lead service lines** CWSs must include a statement that a service line inventory contains no lead service lines and instructions on how to access the information.	40 CFR §141.153(d)(4)(xi)
10. What information must the State report to EPA?	For each water system, the number of Lead, GRR, and Lead Status Unknown service lines in its distribution system, reported separately.	40 CFR §142.15(c)(4)(iii)(D)

[1] On June 10, 2021, EPA signed a rule extending the compliance date from January 16, 2024 to October 16, 2024 (86 FR 31939).

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;
Docket No. P-2023-3041845

COLUMBIA WATER COMPANY'S RESPONSES TO DATA REQUESTS OF THE BUREAU OF TECHNICAL UTILITY SERVICES

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.

RESPONSE:

See the attached revised Pro Forma Tariff provided in response to P-1.

PROVIDED BY: Taz Keyser

DATE: 9/13/2023

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;
Docket No. P-2023-3041845

COLUMBIA WATER COMPANY'S RESPONSES TO DATA REQUESTS OF THE BUREAU OF TECHNICAL UTILITY SERVICES

P-10. The Modified LTIIP included Section 9 that addressed Columbia Water's LSLR Plan. However, the Modified LTIIP 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 LTIIP that includes the necessary updates to all the applicable sections, charts and graphs to reflect the inclusion of the LSLR Plan.

RESPONSE:

See attached final and red lined copies of the revised LTIIP provided in response to P-1. The Company has removed Section 9.0 and incorporated the LSLR Program into the existing LTIIP. Furthermore, as indicated in the revised LTIIP, the Company has updated the relevant tables to incorporate the projected LSLR Program costs. Please note that these numbers differ slightly from the Company's initial filing.

With respect to Table 5, previously labeled as Table 3, as explained on Pg. 10 of the revised LTIIP, prior to the most recent revision, the LTIIP contained thirty (30) service line replacements. The Company-owned service lines being replaced were primarily made of lead materials. Accordingly, the Company is now planning to undertake fifty (50) service line replacements annually beginning in 2024, which includes Company-owned and Customer-owned LSLRs.

With respect to Tables 6 and 7, the Company has updated its projected annual expenditures to reflect $145,000 in service line replacement costs. As explained on Pg. 11 of the revised LTIIP, prior to the most recent revision, the Company was already investing $45,000 into replacing primarily Company-owned service lines made of lead. The Company is now committing to an additional $100,000 for a total of $145,000 for Company-owned and Customer-owned LSLRs beginning in 2024 through 2027 for purposes of the LTIIP. While the Company initially projected $250,000 to replace 25 Company-owned lead service lines and 25 Customer-owned lead service lines, the Company cannot commit to that level of expenditure annually under its LTIIP in combination with its other planned projects.

PROVIDED BY: Taz Keyser

DATE: 09/13/2023

Columbia WATER Company

VERIFICATION

I, Taz Keyser, certify that I am the Information Technology Supervisor for Columbia Water Company and that in this capacity I am authorized to and do make this Verification on their behalf, that the facts set forth in the foregoing document 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 any hearing that may be held in this matter. I understand that false statements made therein are made subject to the penalties of 18 Pa. C.S. §4904, relating to unsworn falsifications to authorities.

Taz Keyser
Information Technology Supervisor
Columbia Water Company

DATED: 09/13/2023

Columbia Water Company
220 Locust Street ▪ P.O. Box 350 ▪ Columbia, PA 17512
Phone: 717-684-2188 ▪ Fax: 717-684-4566

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

BY ELECTRONIC MAIL ONLY:

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/s/ Phillip D. Demanchick Jr.
Whitney E. Snyder
Thomas J. Sniscak
Phillip D. Demanchick Jr.

Dated this 13th day of September, 2023