



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

IN REPLY PLEASE
REFER TO OUR FILE

October 3, 2023

Docket No. A-2023-3041860

Utility Code 213550

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RE: Application of The York Water Company for approval of the right to acquire certain water system assets from Longstown Mobile Estates in Windsor Township, York County at Docket No. A-2023-3041860

Dear Attorneys Hassell and Ryan:

On July 21, 2023, The York Water Company (York Water) filed the above-captioned document with the Pennsylvania Public Utility Commission (Commission). For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

Please forward the information to the Secretary of the Commission at the address listed below **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

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

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

Please note your answers must be verified per 52 Pa. Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature _____
Title _____
Date _____

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the review, please send a copy of the response to Paul Zander, in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at pzander@pa.gov. Please also direct any questions to Paul Zander at telephone number (717) 783-1372. Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure: TUS Data Request Set 1

cc: Patrick Cicero, Office of Consumer Advocate (w/enclosure), ra-oca@paoca.org
Christine Hoover, Office of Consumer Advocate (w/enclosure), choover@paoca.org
NazAarah Sabree, Office of Small Business Advocate (w/enclosure), ra-sba@pa.gov
Richard Kanaskie, Bureau of Investigation & Enforcement (w/enclosure), rkanaskie@pa.gov

TUS Data Request Set 1

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Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

- A-1. The Application did not provide detailed information for the Longstown Mobile Home Park (Longstown MHP) water system assets to be acquired by York Water (the Longstown Water System), and for the proposed water facilities to be constructed or installed by York Water to serve Longstown Water System customers (the Proposed Facilities), including anticipated water meters, meter pits, and meter reading facilities. Please provide the following information for the Longstown Water System and Proposed Facilities:
- a. Provide a map of suitable scale that depicts the location or route of the Longstown Water System and the Proposed Facilities from the point of connection to York Water's existing water facilities. The map needs to identify all pipe sizes and material types of York Water's existing and proposed water mains;
 - b. Provide a breakdown of anticipated pipe sizes, material types, and lengths for Proposed Facilities mains and service lines, respectively, and descriptions and quantities for related assets (e.g., meters and meter pits, etc.); and
 - c. Provide a breakdown of the cost of construction, by major plant account, of the Proposed Facilities.
- A-2. Please explain how customers served by the Longstown Water System receive wastewater service and identify the entity(s) that provide wastewater service to these customers.
- A-3. The Application's Page 4 specified that the Longstown Water System is owned and operated by Longstown Mobile Estates. However, Pennsylvania Department of State public records at <https://file.dos.pa.gov/search/business> appear to indicate that Longstown Mobile Estates is a fictitious name that is registered to an apparent individual named David Smith. Please identify the legal entity (i.e., the name of the individual, partnership, corporation, etc.) that owns and operates the Longstown Water System and that is selling the Longstown Water System to York Water and indicate their business or office address.
- A-4. Please identify the water treatment plant (WTP) that will supply water to the Longstown Water System (e.g., York Water's Grantley Road WTP, etc.).
- A-5. Please specify the permitted peak day capacity of the WTP that will supply water to the Longstown Water System.
- A-6. Please quantify York Water WTP's peak and average daily production for the 2022 calendar year.

TUS Data Request Set 1

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- A-7. Please provide the average monthly water usage for Longstown Water System customers for the 2022 calendar year.
- A-8. Please quantify the number of customer connections, by customer class, currently connected to the Longstown Water System.
- A-9. Please quantify an estimate of the number of connections, by customer class, anticipated to connect to the Longstown Water System within the next five years.
- A-10. Please quantify the number of lots included in the Longstown MHP.
- A-11. Please confirm that, upon closing of the transaction and completion of the Proposed Facilities, York Water will be able to provide adequate water supply, treatment, storage, and distribution capacity to meet present and future customer needs.
- A-12. Please confirm that York Water and the Longstown MHP are not affiliated and that all negotiations were conducted at arm's length.
- A-13. Please provide York Water's tentative journal entries, by major plant account, for booking the purchase of Longstown's assets in accordance with the National Association of Regulatory Utility Commissioners Uniform System of Accounts applicable to York Water. These journal entries should be similar in form to the tentative journal entries provided on Page 10 of York Water's Application at Docket Nos. A-2023-3038862 and A-2023-3038864 under "Record Purchase of System".
- A-14. Please provide an estimate of York Water's cost to acquire the Longstown Water System, including incidental expenses properly includible in utility plant.
- A-15. Please identify the anticipated closing time frame for the proposed transaction after Commission approval of the Application.
- A-16. Please confirm whether York Water's effective water tariff requires York Water to exclude customers served by the Longstown Water System and Longstown Water System investments, expenses, and revenues from York Water's distribution system improvement charge (DSIC) until York Water receives Commission approval of a new or modified long-term infrastructure improvement plan that incorporates DSIC eligible property information for the Longstown Water System.
- A-17. Please clarify whether any permits, easements, or rights-of-way are required to construct, operate, and maintain the Proposed Facilities. If so, identify the necessary permits, easements, and rights of way, their estimated costs, and the entity responsible for obtaining each applicable permit, easement, or right-of-way.
- A-18. Please explain how Application approval would benefit York Water's existing customers.

TUS Data Request Set 1

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A-19. Please state whether Windsor Township has a mandatory connection ordinance for water service.