

# **EXHIBIT X**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**AQUA PENNSYLVANIA WASTEWATER, INC.**

**DOCKET NO. A-2023-3041695**

**AQUA STATEMENT NO. 2**

**DIRECT TESTIMONY OF  
MARK J. BUBEL, SR.**

**With Regard To  
Description of the System  
Capital Improvements  
Environmental Compliance**

**November 2023**

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Mark J. Bubel, Sr. My business address is 762 West Lancaster Avenue, Bryn  
4 Mawr, Pennsylvania 19010.

5  
6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by Aqua Pennsylvania, Inc. (“Aqua PA”) as a Project Engineer III.  
8

9 **Q. Please provide a brief description of your education and work experience.**

10 A. I received a Bachelor’s of Science Degree (B.S.) in Civil Engineering in 1980 from Lehigh  
11 University and a Master’s Degree in Civil Engineering (M.C.E.) with a concentration in  
12 Environmental Engineering in 1983 from Villanova University. I have worked in various  
13 engineering roles and have over 40 years of experience in environmental engineering  
14 related to municipal and industrial wastewater treatment and operations. I have worked at  
15 Essential Utilities, Inc. *f/k/a* Aqua America, Inc. since 2003 in roles related to wastewater  
16 treatment facilities including planning, design, start-up, and operational troubleshooting. I  
17 am a Registered Professional Engineer in Pennsylvania, Delaware, Maryland, North  
18 Carolina, and Florida. I am also a Licensed Water and Wastewater Operator in  
19 Pennsylvania.

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1 **Q. Have you previously testified before the Pennsylvania Public Utility Commission**  
2 **(“PUC” or the “Commission”)?**

3 A. Yes. I provided testimony in Aqua Pennsylvania Wastewater, Inc.’s (“Aqua” or the  
4 “Company”) ten prior Section 1329 proceedings. I also provided testimony in Aqua PA  
5 and Aqua’s 2018 base rate case proceedings.

6  
7 **Q. What is the purpose of your Direct Testimony?**

8 A. The purpose of my Direct Testimony is as follows: (1) to provide a general description of  
9 the aged condition of the Greenville Sanitary Authority’s (“GSA”) wastewater collection  
10 and treatment system (the “System”); (2) to discuss capital improvements needed to the  
11 GSA System; and (3) to discuss environmental non-compliance of the System.

12  
13 **Q. Are you sponsoring any Exhibits with the Company’s filing?**

14 A. Yes. Attached to my Direct Testimony as Appendix A is Aqua’s 10-year capital plan for  
15 the GSA System.

16  
17 **II. OVERVIEW OF AQUA AND THE GSA SYSTEM**

18 **A. OVERVIEW OF AQUA**

19 **Q. Please provide a general overview of Aqua.**

20 A. Aqua, a subsidiary of Aqua PA, is engaged in the business of collecting, treating,  
21 transporting, and disposing of wastewater for the public. Aqua serves approximately  
22 60,000 customers in Adams, Berks, Bucks, Carbon, Chester, Clarion, Clearfield, Delaware,  
23 Lackawanna, Luzerne, Monroe, Montgomery, Pike, Schuylkill, Venango, and Wyoming

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1 Counties. Aqua operates 40 wastewater treatment plants (“WWTP”) throughout the  
2 Commonwealth of Pennsylvania, and four systems of Aqua’s Western Division are in  
3 proximity to the Borough of Greenville (“Borough” or “Greenville”) allowing for  
4 operational efficiencies once the GSA System is folded into Aqua’s portfolio of wastewater  
5 utility systems. Aqua, and its parent company Aqua PA, have approximately 600  
6 employees bringing extensive expertise in providing water and wastewater service to  
7 citizens of Pennsylvania.

8  
9 **B. DESCRIPTION OF THE GSA SYSTEM**

10 **Q. Before providing a description of how the flows are transmitted to the GSA WWTP,**  
11 **what are your general observations of the GSA System?**

12 A. The System is very aged, due to insufficient investment. As a direct result of this, it has  
13 received recent and repeated fines under a Consent Order and Agreement (“COA”) under  
14 the Pennsylvania Department of Environmental Protection (“DEP”), and would not be in  
15 the condition it is today were it under Aqua’s ownership. While some upgrades have  
16 occurred over the years, the original WWTP is over 60 years old. Under the current  
17 ownership, elevated levels of effluent total residual chlorine have entered into the  
18 surrounding bodies of water which is a threat to the aquatic life.

19  
20 **Q. Please provide a description of how the untreated wastewater flows are conveyed to**  
21 **the GSA WWTP, as well as the GSA WWTP mechanics and treatment processes.**

22 A. The Borough is located in the northwestern part of Mercer County, Pennsylvania and the  
23 entirety of Greenville is served by a public sewer system. The GSA System is a collection,

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1 conveyance, and treatment system owned by the GSA that collects wastewater from within  
2 the Borough and from two contributing municipalities Hempfield Township (“Hempfield”)  
3 and West Salem Township (“West Salem”), collectively the “Contributing Municipalities”.  
4 The wastewater from Hempfield flows by gravity into the GSA System and flows from  
5 West Salem are pumped via four pump stations owned by West Salem into the GSA  
6 System. Wastewater then flows through the GSA System via gravity and force mains and  
7 through three pump stations owned by the GSA to the GSA WWTP.

8 The GSA collection system has three (3) small grinder pump stations which lift  
9 (pump) the wastewater into the gravity sanitary sewer system which in turns flows to the  
10 GSA WWTP.

11 The treatment plant raw wastewater influent structure provides raw wastewater  
12 influent sampling, comminution (grinding), and diverts the flow into an influent wet well  
13 where pumps lift the flow into four (4) primary clarifiers, which are operated in parallel,  
14 for gravity settling to remove heavy inorganic and organic solids as well as to reduce  
15 biochemical oxygen demand (“BOD5”). Just prior to the primary clarifier lift pumps there  
16 is a bypass which allows flow greater than 6.25 million gallons per day (“MGD”) to bypass  
17 the primary clarification system and trickling filters (“TF”) and go directly to a bypass  
18 pump station with bar screen. The pumped by-passed flow enters an activated sludge  
19 aeration channel where it combines with the discharge from the un-bypassed TF recycle  
20 flow and return activated sludge flow from the secondary flocculating clarifiers.

21 Flow which is less than 6.25 MGD (the typical dry weather un-bypassed flow)  
22 enters the primary clarifiers, as noted above, and then into the TF wet well pumping system.  
23 The pumping system directs the flow into two TFs operated in parallel for further reduction

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1 of BOD5 (sufficient to also allow nitrification). The TFs make use of the fixed film  
2 treatment technology for biological treatment of the wastewater. The discharge from the  
3 TF system enters the above-mentioned activated sludge aeration channel and combines  
4 with bypassed flow, if any, for additional treatment prior to final sedimentation. Aluminum  
5 sulfate (alum) is added for total phosphorus removal. Final settling is achieved following  
6 the TFs in two flocculating clarifiers operated in parallel. The final treatment step prior to  
7 discharge to the Shenango River is chlorine gas disinfection.

8 Wastewater solids produced during primary clarification are pumped through a  
9 conditioning well prior to introduction to two anaerobic digestors. The digested primary  
10 sludge is then dewatered via belt filter press and hauled off-site for landfill disposal. Waste  
11 activated sludge is thickened via a gravity belt thickener prior to introduction to the same  
12 anaerobic digestors. Dewatering occurs with digested sludge applied to sludge drying beds  
13 where, once dried, the sludge is collected and hauled off-site to the landfill as well.

14 The GSA WWTP is permitted under a DEP permit at an annual average flow of 4.0  
15 MGD and had a maximum monthly average flow of 4.50 MGD in 2022. The 2022 annual  
16 average flow was 1.90 MGD and the 3-month maximum average flow was 3.42 MGD.  
17 The GSA WWTP is permitted for a maximum organic loading of 5,000 pounds per day  
18 (lbs./day). The 2022 maximum month organic loading was 3,179 lbs./day.

19 The GSA collection and transmission piping is summarized in the Engineering  
20 Assessment included as Exhibit D to the Application.

21

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1 **Q. Please provide the elevations for the WWTP, GSA Pump Stations, and the Requested**  
2 **Territory.**

3 A. The elevations are as follows:

4 WWTP: elevation generally varies between EL 928 to EL 938.

5 Requested Territory: Area elevations vary generally from:

- 6 • EL 984 to EL 1181 along the western boundary.
- 7 • EL 918 to EL 984 along the southern boundary.
- 8 • EL 918 to EL 1049 along the northern boundary.
- 9 • EL 1033 to EL 1082 along the eastern boundary.

10 Barrett Street Pump Station: The elevation is approximately EL 967.

11 Penn Avenue Pump Station: The elevation is approximately EL 944.

12 North Front Street Pump Station: The elevation is approximately EL 967.

13

14 **Q. Please state the approximate time of the installation of the component facilities of the**  
15 **System.**

16 A. The GSA WWTP was constructed and placed in service in approximately 1960 and  
17 provided basic primary treatment. Certain upgrades occurred in 1994 including efforts to  
18 eliminate wet weather bypass flows and provide phosphorous removal. The average age  
19 of the pipe in the System is approximately 61 years old.

20 The three (3) pump stations, Barrett Street, Penn Avenue, and North Front Street,  
21 each have two E/one grinder pumps, which pumps were replaced at each location in 2020.  
22 The wet wells were drained and cleaned in 2021 for all three pump stations. The GSA  
23 operates and maintains the collection, conveyance and pumping station system within West

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1 Salem under contract with West Salem. Aqua will operate the West Salem system upon  
2 closing on the GSA system.

3

4 **Q. Please state the number of GSA customers by class and gallons billed.**

5 A. The GSA has 2,281 customers and two Contributing Municipalities. The breakdown by  
6 customer class and usage is shown in the below table.

Service Area	Residential	Commercial	Public	Industrial	Contributing Municipality	Total
GSA	2,082	183	14	2	2	2,283
Gallons	72,593,000	24,340,000	1,898,000	302,000	74,973,575 <sup>1</sup>	174,106,575

7

8 Gallons billed in the above table are based on water meter data. The annual average  
9 Total Gallons treated at the GSA WWTP for 2022 was 694,595,000 based on Chapter 94  
10 Report data. Based upon the billing data vs. flow data, this would suggest there is  
11 significant infiltration and inflow (“I&I”) present in the System. This issue has been  
12 present in the System and has not been addressed to date.

13

14 **Q. Are the acquired GSA customers currently Aqua PA water customers?**

15 A. No. The GSA’s wastewater customers are currently served by the Municipal Authority of  
16 the Borough of Greenville – Greenville Water Authority (“GWA”).

17

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<sup>1</sup> Please see the Direct Testimony of William C. Packer (Aqua Statement No. 1), Appendix A. Estimated based on revenues of the Contributed Municipalities.

1 **III. CAPITAL IMPROVEMENTS**

2 **Q. Is Aqua planning any capital projects over the next 10 years?**

3 A. Yes. Aqua identified upgrades to the GSA WWTP and gravity collection systems based  
4 on compliance, facility conditions observed, facility age, and safety. Aqua estimates that  
5 it will invest approximately \$20.4 million over the next 10 years in the entire System. As  
6 explained further below, the GSA had planned upgrades and already started engineering  
7 design to the WWTP of \$45.6 million to address the COA. The GSA has already spent  
8 approximately \$2.8 million on design when they decided to stop in light of a sale to Aqua.  
9 However, through Aqua's review of the GSA System and the plans that the GSA had  
10 developed, Aqua has identified a more cost effective solution to that as proposed by the  
11 GSA. Aqua's acquisition of the GSA System will directly save customers over \$20 million  
12 in avoided capital improvement costs.

13 The GSA WWTP has not had an upgrade since 1994, and it exceeded its organic  
14 design capacity through increased biological loadings during 2020, which is mentioned in  
15 the COA. In 2020, the GSA began designing upgrades to the GSA WWTP, including:  
16 utilizing the existing tankage for construction of a membrane bioreactor treatment system,  
17 construction of a new pump station and headworks building, as well as refurbishment of  
18 the sludge digestion, dewatering and disinfection processes. The upgraded process was  
19 designed for average flows of 4 MGD with the capability to handle a peak hourly flow of  
20 10 MGD and a peak daily flow of 8 MGD, and to operate efficiently at an average organic  
21 loading of 5,000 lbs. BOD5/day. These process upgrades would make the GSA WWTP  
22 capable of handling the excessive peak loads experienced in August 2020 and February  
23 2021. Without upgrade, the organic loading is projected to be organically overloaded over

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1 the next four years. The total projected cost for these upgrades as designed by the GSA is  
2 \$45.6 million.

3 Aqua believes a lower cost alternative is available to address the perceived  
4 overloading condition. Upon examination of the data by Aqua, it appears that the high  
5 monthly organic loading noted in August 2020 and February 2021 may be due to erroneous  
6 influent raw wastewater sampling. In 2020, the months prior to and following August  
7 indicate an organic loading much less than 5,982 lbs./day. Discharge Monitoring Reports  
8 (“DMR”) data for August indicates an average monthly effluent CBOD5 of <3.0 mg/l and  
9 an effluent ammonia concentration of 0.3 mg/L. It also appears likely that in February of  
10 2021 an organic loading of 8,321 lbs./day was registered due to an erroneous sampling  
11 anomaly. DMR data for this month indicates an average monthly effluent CBOD5  
12 concentration of <3.2 mg/L and an effluent ammonia concentration of 1.6 mg/L. It is  
13 therefore unlikely that the high monthly loadings registered for both years are valid as  
14 evidenced by compliance with CBOD5 and ammonia-nitrogen permit limits. The 2022  
15 Chapter 94 Report does not indicate a hydraulic or organic overload in the next five years.

16 As part of due diligence, Aqua has met with DEP regarding its planned  
17 improvements to the GSA WWTP. DEP did not offer any comments that would suggest  
18 that the plant needed to be upgraded using the Membrane Bioreactor (“MBR”) Technology  
19 for treatment, consistent with Aqua’s opinion. The COA entered into by the GSA is  
20 focused on meeting the facility’s effluent total residual chlorine (“TRC”) limit. Aqua’s  
21 plans to implement a dechlorination chemical feed system for the GSA WWTP, which,  
22 consistent with Aqua’s experience, will enable compliance with the NPDES Permit relative

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1 to effluent TRC. Aqua also plans to make collection system improvements to reduce  
2 obvious I&I including:

- 3 • existing headworks building modifications / HVAC safety upgrades;
- 4 • effluent pump station upgrades;
- 5 • primary clarifier additions;
- 6 • trickling filter improvements;
- 7 • flocculating clarifier improvements;
- 8 • anaerobic digester conversion;
- 9 • electrical system upgrades and arc-flash remediation;
- 10 • conversion of the disinfection system from gas chlorine to liquid sodium  
11 hypochlorite (for safety);
- 12 • institution of a SCADA system; and
- 13 • replacement of identified end-of-life equipment following an audit of plant  
14 equipment.

15 Aqua's projected cost for completing these upgrades to the GSA WWTP is \$16.7 million.  
16

17 **Q. Please summarize the benefits specifically related to Aqua's proposed acquisition of**  
18 **the GSA System.**

19 A. Through this transaction and Aqua's ownership the GSA, customers will save over \$20  
20 million in avoided capital costs through Aqua's experience and planning expertise.

21 According to the GSA's Chapter 94 Report, there was an existing and projected  
22 organic growth overload, which necessitated a Corrective Action Plan. There were no  
23 reported SSOs in 2022 as reported in the Chapter 94 Report; however, it was noted that

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1 there were eight trouble spots for the System that were targeted for general/routine  
2 cleaning. Aqua will assess as we begin operating the system.

3

4 **Q. Do you foresee any other projects that would be required in the immediate future?**

5 A. Replacement and upgrade of facilities will continue beyond Aqua's 10-year capital plan  
6 based on facility age and expected facility life span. As noted in the Direct Testimony of  
7 Zach Martin (Aqua Statement No. 1), several operational upgrades will occur post-closing  
8 requiring capital expenditures to address significant system deficiencies outlined therein.  
9 See Appendix A.

10

11 **IV. ENVIRONMENTAL COMPLIANCE**

12 **Q. Does the Application include National Pollution Discharge Elimination System**  
13 **("NPDES") permits?**

14 A. Yes, the NPDES discharge permit for the GSA WWTP is included in the Application as  
15 Exhibit N1.

16

17 **Q. Does the Application include Water Quality Management ("WQM") Permits?**

18 A. Yes. The WQM permit for the GSA WWTP and the WQM permit application for the  
19 Barrett Street, Penn Avenue, and North Front Street Pump Stations are included with the  
20 Application as Exhibit M1 and M2, respectively.

21

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1 **Q. Are Act 537 plans included in the Application?**

2 A. Yes. The GSA's Act 537 plan is included with the Application as Exhibit P1. Act 537  
3 Plans for Hempfield and West Salem are included with the Application as Exhibit P2 and P3,  
4 respectively.

5  
6 **Q. Are there any Notices of Violation ("NOV") issued to the GSA by the DEP in the last**  
7 **five years?**

8 A. The GSA experienced several non-compliance incidents during 2019-2022. These non-  
9 compliance incidents are included as Exhibit O1 to the Application. The one non-  
10 compliance on 9-30-22 was caused by the loss of electrical power at the WWTP which  
11 impacted the biological treatment process and only provided flow to primary sedimentation  
12 and chlorination for disinfection. The incident lasted an estimated 6-hours during which  
13 time partially treated wastewater may have been discharged from the WWTP to the  
14 receiving stream. Impacts to the receiving stream are not documented. This system failure  
15 would have been avoided with a backup generator. Aqua plans on including emergency  
16 backup power capable of powering the entire treatment facility which will insure protection  
17 of the receiving stream.

18 There was a non-compliance included in the 2022 Chapter 94 Report which  
19 referenced a sanitary sewer overflow at the Kinsman Road Pump Station which Greenville  
20 Borough operates from which raw sewage was discharged to the surrounding environment.  
21 This pump station is in West Salem Township and not within the Borough of Greenville.

22

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1 **Q. Have there been any Consent Orders entered into by the GSA and the DEP?**

2 A. Yes, as mentioned above, on January 1, 2022, the GSA, the Borough and the DEP entered  
3 into a COA to resolve the GSA's violations of its NPDES permit. A copy of the COA is  
4 included in the Application as Exhibit O2.

5 For various months between June 2019 and June 2021, the GSA reported discharges  
6 from the GSA WWTP that exceeded the limits in the NPDES Permit, and informed the  
7 DEP that it could not comply with the 0.19 mg/l monthly average and 0.62 mg/l  
8 instantaneous maximum effluent limits for Total Residual Chlorine until the proposed plant  
9 upgrades (discussed above) were completed. Per the COA, the upgrades planned to the  
10 GSA WWTP were supposed to have been completed in 2020, but they were not. See  
11 Exhibit O2, Findings Paragraph H.

12  
13 **Q. What did the COA require?**

14 A. The GSA and the Borough agreed in the COA to provide a report to the DEP evaluating  
15 the GSA WWTP's chlorine disinfection system and describing available improvements  
16 and operational changes, if any. The GSA and the Borough were also directed to provide  
17 an administratively complete application for a WQM Permit for the proposed WWTP  
18 upgrades by February 1, 2023, with construction of the DEP-approved WWTP upgrades  
19 to commence by January 1, 2024 and be completed by January 1, 2026. The GSA also  
20 agreed to penalties in connection with the COA, including a one-time fine of \$1,000 and  
21 continuing penalties of \$250 per month for any and all exceedances of the NPDES Permit  
22 limits and \$1,500 for each failure to comply with specific requirements set forth in the  
23 COA. The GSA has incurred \$5,200 in fines to date under the stipulated penalties of the

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1 COA. A copy of the Disinfection System Evaluation Report is attached to the Application  
2 as Exhibit O2.

3 The GSA submitted its WQM Permit application for the WWTP upgrades on  
4 October 3, 2022, and received the WQM Permit from DEP that is included in this  
5 Application as Exhibit M1. As discussed above, Aqua believes there is a more cost-  
6 effective solution than completing the WWTP upgrades set forth in the permit application  
7 and has had discussions with DEP on how to address those improvements with less impact  
8 to customers.

9

10 **Q. Please state if there are any current environmental compliance issues for the System.**

11 A. While there are no other compliance issues on file with the DEP, several environmental  
12 concerns are highlighted in the Direct Testimony of Zach Martin (Aqua Statement No. 1).

13

14 **Q. Are there any noncompliance issues pending with the United States Environmental  
15 Protection Agency?**

16 A. None of which Aqua is aware.

17

18 **Q. Please state the estimated number of future connections for the System for the next 5  
19 years.**

20 A. The below table provides projected equivalent dwelling units (“EDU”) for the next five  
21 years (2023-2027):

Year	2023	2024	2025	2026	2027
New EDUs	17	17	17	17	17

22

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1 **Q. Is there present system capacity to meet the demands of current and future**  
2 **customers?**

3 A. Yes. Based upon the permitted capacity of the GSA WWTP at 4.0 MGD, the average  
4 annual flow ranging from 1.85 to 2.1 MGD over the last five years, and the projected EDUs  
5 over the next five years, there is system capacity to meet the demands of present and future  
6 customers. In addition, Aqua's plan for the GSA WWTP upgrades address higher flow  
7 months through a more cost effective approach will allow Aqua to continue to serve current  
8 and future customers of the GSA.

9  
10 **Q. Please summarize why you believe it is in the public interest for Aqua to own and**  
11 **operate the System.**

12 A. My explanation of Aqua's current operations, the System's similarity to other systems  
13 operated by Aqua, the System's proximity to Aqua's existing service territory, and the  
14 additional expertise and support that will be provided by Aqua as an experienced  
15 wastewater utility owner and operator. Specifically, Aqua's revised plans for the GSA  
16 WWTP upgrades save the GSA customers over \$20 million in avoided capital costs further  
17 demonstrate that the proposed transaction is in the public interest, and which would not  
18 occur absent Aqua's acquisition of the GSA System.

19  
20 **V. CONCLUSION**

21 **Q. Does this conclude your Direct Testimony?**

22 A. Yes, it does. However, I reserve the right to supplement my testimony as additional issues  
23 and facts arise during the course of this proceeding.

	System Component	Description	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	TOTAL
1	Safety Measures (Safety)	Miscellaneous	\$50,000										\$50,000
2	Collection (Compliance)	Temporary Metering Program	\$100,000										\$100,000
3	Collection (Compliance)	MH Rehabilitation		\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$1,125,000
4	Collection (Compliance)	Prioritized Main Rehabilitaton and replacement		\$200,000	\$200,000	\$200,000	\$200,000	\$200,000	\$200,000	\$200,000	\$200,000	\$200,000	\$1,800,000
5	Collection (New)	New Customer Connections	\$60,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$10,000	\$150,000
6	Collection (Compliance)	Existing Lateral Repairs	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$50,000	\$500,000
7	Treatment Audit	Plant Audit	\$75,000										\$75,000
8	Treatment (Compliance)	Dechlorination System / Re-aeration	\$350,000										\$350,000
9	Treatment (Safety)	Existing Headworks Building Modifications / HVAC Upgrades	\$100,000	\$750,000									\$850,000
10	Treatment (Safety/Compliance)	Effluent Pumping Station					\$150,000		\$1,000,000	\$1,000,000			\$2,150,000
11	Treatment (Compliance)	Two New Primary Clarifiers					\$150,000		\$1,000,000	\$1,500,000			\$2,650,000
12	Treatment (Safety)	Demo Existing Primary Clarifiers									\$100,000		\$100,000
13	Treatment (Compliance)	TF Improvements					\$300,000	\$2,000,000	\$2,000,000				\$4,300,000
14	Treatment (Compliance)	Flocculation Clarifier Repair								\$750,000			\$750,000
15	Treatment (Safety / Compliance)	Anaerobic Digester Conversion	\$150,000	\$750,000									\$900,000
16	Treatment (Safety / Compliance)	Electrical Upgrades / Arc Flash remediation	\$125,000	\$125,000	\$750,000					\$750,000			\$1,750,000
17	Treatment (Safety)	Convert from Cl Gas to Hypo		\$300,000									\$300,000
18	Treatment (Compliance)	SCADA System	\$50,000	\$200,000									\$250,000
19	Treatment (Compliance)	Audit projects	\$350,000	\$350,000	\$350,000	\$350,000	\$350,000	\$100,000	\$100,000	\$100,000	\$100,000	\$100,000	\$2,250,000
		<b>TOTALS</b>	\$1,460,000	\$2,860,000	\$1,485,000	\$735,000	\$1,335,000	\$2,485,000	\$4,485,000	\$4,485,000	\$585,000	\$485,000	\$20,400,000
		Rolling Total	\$1,460,000	\$4,320,000	\$5,805,000	\$6,540,000	\$7,875,000	\$10,360,000	\$14,845,000	\$19,330,000	\$19,915,000	\$20,400,000	