



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

IN REPLY PLEASE  
REFER TO OUR FILE

December 15, 2023

Docket No. A-2023-3043501  
Utility Code 212285

TERESA K HARROLD ESQUIRE  
PENNSYLVANIA AMERICAN WATER COMPANY  
852 WESLEY DRIVE  
MECHANICSBURG PA 17055  
[TERESA.HARROLD@AMWATER.COM](mailto:TERESA.HARROLD@AMWATER.COM)

RE: Application of Pennsylvania-American Water Company for approval of the right to offer, render, furnish, and supply water service to the public in a portion of Dimock Township, Susquehanna County at Docket No. A-2023-3043501

Dear Attorney Harrold:

On October 13, 2023, Pennsylvania-American Water Company (PAWC) 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](mailto: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](mailto:ra-oca@paoca.org)  
Christine Hoover, Office of Consumer Advocate (w/enclosure), [choover@paoca.org](mailto:choover@paoca.org)  
NazAarah Sabree, Office of Small Business Advocate (w/enclosure), [ra-sba@pa.gov](mailto:ra-sba@pa.gov)  
Richard Kanaskie, Bureau of Investigation & Enforcement (w/enclosure), [rkanaskie@pa.gov](mailto:rkanaskie@pa.gov)

## TUS Data Request Set 1

Application of Pennsylvania-American Water Company for approval of the right to offer, render, furnish, and supply water service to the public in a portion of Dimock Township, Susquehanna County at Docket No. A-2023-3043501

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's Exhibits E and F included a map and written description, respectively, of the requested service territory that used several roadway centerlines and intersections to define the requested territory's boundaries. However, roadway centerlines and intersections may shift or may be eliminated with future roadway expansion and realignment projects. Please provide revised Exhibits E and F to include a revised description of PAWC's requested service territory's boundaries using geographic coordinates for origin points and corresponding bearing angles and distances from each point. Also, please quantify the area of the revised requested service territory in acres of land.
- A-2. The Application's Paragraph 20 and Exhibit A of the *pro forma* Offsite Development Marketing Agreement (ODMA) included in the Application's Exhibit D specified that proposed water facilities (the Water System) will include two wells. However, the map included with the ODMA's Exhibit A appears to depict the location of only one well. Please clarify the number of wells to be constructed as part of the Water System and provide a revised map depicting all well locations if there will be more than one well.
- A-3. Please provide a detailed breakdown, by major plant category, of the Water System's total construction and installation costs that includes material type descriptions, quantities, sizes, lengths, unit costs and extended costs. This breakdown must separately identify values for wells, storage tanks, distribution mains, water supply meters, customer meters, PAWC-owned service lines, and other assets, by major plant account, including meter quantities and sizes, distribution main and PAWC-owned service line material types, sizes, and lengths, and storage tank sizes and material types.
- A-4. Please provide an estimate of the number of customers, by customer class, anticipated to connect to the Water System upon completion of its construction.
- A-5. Please provide an estimate of the number of customers, by customer class, anticipated to connect to the Water System within five years of the Water System being placed in service.
- A-6. Please quantify the Water System's anticipated initial peak and average daily water demands, respectively.
- A-7. Please quantify the Water System's anticipated peak and average daily water demands, respectively, for the fifth year after the Water System is placed in service.
- A-8. Please provide the Water System's anticipated design peak and average daily production capacities, respectively, for each Water System source of supply.

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- A-9. Please provide the Water System's anticipated design peak and average daily treatment capacities, respectively, for the Water System's water treatment plant.
- A-10. Please provide the Water System's permitted production capacities.
- A-11. Please provide the Water System's permitted treatment capacity.
- A-12. Please confirm that after Water System construction and installation, PAWC will be able to provide adequate water supply, treatment, storage and distribution capacity to meet the demands of customers in the requested territory.
- A-13. Please provide a copy of the Water System's Pennsylvania Department of Environmental Protection (DEP) public water supply (PWS) construction permit.
- A-14. Please provide a copy of PAWC's PWS construction permit application to DEP for the Water System.
- A-15. Please identify the necessary permits, easements, and rights of way required to construct, operate, or maintain the Water System, their estimated costs, the entity responsible for obtaining each applicable permit, easement, or right-of-way, and the current status of obtaining each permit (e.g., received, applied for, not yet applied for).
- A-16. Please indicate if Dimock Township has a mandatory connection ordinance for water service. If so, please clarify if the subject ordinance requires mandatory water service connections in the requested territory.
- A-17. Please provide a valid certified operator's certificate for the certified water operator that PAWC will use to operate the Water System.
- A-18. The ODMA's Paragraph 7 indicated that PAWC will install service lines and behind-the-meter facilities on behalf of customers. However, Paragraph 7 also stated that the Office of Attorney General (OAG) shall not be responsible for any costs associated with Paragraph 7. Please specify the entity that is responsible for the cost of installing service lines and behind the meter facilities and for abandoning customer wells. If PAWC is responsible for any of these costs, identify the sources of funds for these costs (i.e., contributed funds, debt, equity, etc.).
- A-19. The ODMA's Paragraph 8 specified that at the time the final memorandum is executed, the OAG will make a lump sum payment to PAWC of \$1.05 million (Lump Sum Payment), which will be credited in the amount of \$50,000 each to the water bills of certain properties. Please provide responses for each of the following:
  - a. Explain whether Lump Sum Payment funds will be available to PAWC without any restrictions on how funds may be used or identify applicable Lump Sum Payment fund restrictions. Also, state whether Lump Sum Payment funds may be invested;

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- b. Explain how PAWC will treat Lump Sum Payment funds for accounting purposes (e.g., PAWC will record the Lump Sum Payment, and any related gains/losses, as a liability under Account 253 – Other Deferred Credits until recognized in rates, etc.); and
  - c. Explain how PAWC will treat Lump Sum Payment funds for ratemaking purposes (e.g., PAWC will deduct remaining Lump Sum Payment funds, and any related gains/losses, from rate base until recognized in rates, etc.).
- A-20. The ODMA’s Exhibit A indicated that PAWC is upgrading its billing system to allow it to administer the \$50,000 credits to eligible customers within the requested service territory. Please quantify the anticipated capital costs for this billing system upgrade and identify the sources of funds for this upgrade (i.e., contributed funds, debt, equity, etc.).
- A-21. In the Application’s Paragraph 22, PAWC specified that it is requesting that the Commission approve “a limited waiver of [PAWC]’s tariff rules providing that customers are responsible for the installation of service pipes, meter pits and backflow preventers (Rules 4.6, 4.9, 5.2).” Please provide a revised *pro forma* tariff supplement that includes PAWC’s proposed rules and regulations for the installation of service pipes, meter pits and backflow preventers in the requested territory, and that would eliminate the need for any tariff waivers for the Application. This *pro forma* tariff supplement may include terms that would permit PAWC to implement the rules, regulations, and practices identified in the Application’s Paragraphs 21 and 23 for the 21 impacted customers identified in Application’s revised Exhibit E.