



**Elizabeth Rose Triscari**  
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January 11, 2024

**VIA ELECTRONIC FILING**

Ms. Rosemary Chiavetta, Secretary  
Commonwealth of Pennsylvania  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Agreement of Sale dated November 21, 2023  
between Pennsylvania-American Water Company  
and Butler Township, Luzerne County for the  
purchase of Nutrient Credits from the 2022-2023  
Water Year – Docket No. U-2023-3045071**

Dear Secretary Chiavetta:

In response to your letter dated December 27, 2023, attached for filing is Pennsylvania-American Water Company's responses to Data Request Set I, regarding the above referenced docket number.

If you should have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Elizabeth Rose Triscari".

Elizabeth Rose Triscari

Enclosures

cc: All Parties on the attached Certificate of Service (*via electronic mail*)  
James Kennedy (*via electronic mail*)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Agreement of Sale dated November 21, 2023 between Pennsylvania-American Water Company and Butler Township, Luzerne County for the Purchase of Nutrient Credits from the 2022-2023 Water Year</b>	: : : : : : :	<b>Docket No. U-2023-3045071</b>
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**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving the above-referenced Data Response upon the persons and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

**Service in the manner listed below addressed as follows on January 11, 2024**

Patrick Cicero, Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
*(via electronic mail)*

NazAarah Sabree, Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101  
*(via electronic mail)*

Richard Kanaskie, Director  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
400 North Street  
PO Box 3265  
Harrisburg, PA 17105  
*(via electronic mail)*

Respectfully Submitted,



Elizabeth Rose Triscari, Esquire (PA ID #306921)  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
(717) 550-1574  
Email: [elizabeth.triscari@amwater.com](mailto:elizabeth.triscari@amwater.com)

**Attorney for Pennsylvania-American  
Water Company**

**Public Utility Municipal Contract – Agreement of Sale between the  
Pennsylvania American Water Company and Butler Township,  
Luzerne County**

**Docket No. U-2023-3045071**

**PAWC's Responses to Set I Data Requests from Bureau of Technical  
Utility Services**

**U-1.** The filing's Agreement of Sale indicates that PAWC is selling 58 Phosphorus Credits to Butler Township, Luzerne County. The Nutrient Credit Point Source Verification Request included as part of Exhibit A indicates that PAWC requested verification of 955 Phosphorus Credits. However, the Pennsylvania Department of Environmental Protection's (DEP's) response letter, dated November 3, 2022, included as part of Exhibit A, indicated that PAWC has zero Phosphorus Credits. Please provide evidence that DEP verified PAWC has an adequate quantity of Phosphorus Credits available to satisfy the purchase request from Butler Township.

**Response:** Please see **Attachment U-1**.

**Responsible Witness:** **Christine Wesolowski - Supervisor, Water Quality and  
Environmental Compliance  
Pennsylvania-American Water  
Company**

**Date:**  
**January 11, 2024**



October 31, 2023

Ms. Christine Wesolowski  
 Production Supervisor  
 PAWC Scranton Wastewater Operation  
 2500 Sanitary Drive  
 Scranton, PA 18505  
 570-906-5044  
[christine.wesolowski@amwater.com](mailto:christine.wesolowski@amwater.com)

Re: Verification of Nutrient Reduction Credits – Scranton Wastewater Operation

Dear Ms. Wesolowski:

The Department of Environmental Protection (DEP) is in receipt of a request for verification (“request”), including a [Nutrient Credit Point Source Verification Request](#) form (3830-FM-BCW0506b) and [Annual Chesapeake Bay Spreadsheet v2.2](#) demonstrating credit generation.

DEP approval of a verification request indicates that the generator has verified the pollutant reduction activity using the Annual Chesapeake Bay Spreadsheet and that other verification requirements of the Nutrient Credit Trading Program, such as baseline and threshold, have been met (See 25 Pa. Code §96.8(f)).

The following nutrient pollutant reduction activity has DEP approval for verification:

Verification ID	Cert ID	Generator	Pollutant Reduction Activity	N Credits Verified	P Credits Verified	Verification Date	Verification Expiration
1162	1130	PAWC Scranton	Advanced Wastewater Treatment	29,660	955	10/31/23	11/28/23

Assuming no contrary information comes to DEP’s attention, DEP is prepared to register the verified credits generated by the pollutant reduction activity listed above upon receipt of a [Nutrient Credit Registration Request form](#) (36800-FM-BCW0504) and related valid contract. These credits may only be used towards compliance with an NPDES permit for the 2022 compliance year until November 28, 2023.

PAWC Scranton Wastewater Operation shall furnish to DEP, within the timeframe specified by DEP, any information DEP may request related to this verification. All documents, records, data, or other information related to this verification shall be maintained by PAWC Scranton Wastewater Operation for a minimum of three (3) years from the expiration date of the related certification.

Pertinent information related to credit certification, verification, and registration, including data on credit generators and buyers, will be published on DEP's Nutrient Trading website at:

[www.dep.pa.gov/nutrient\\_trading](http://www.dep.pa.gov/nutrient_trading)

If you have any additional questions regarding this verification of credits, please do not hesitate to contact DEP at [RA-EPPANutrientTrad@pa.gov](mailto:RA-EPPANutrientTrad@pa.gov) or 717.772.5811.

Sincerely,




Andrew E. Hall  
Environmental Group Manager  
Wastewater Operations Section

## VERIFICATION

I, Christine Wesolowski, hereby state that the facts set forth above 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).

Date: 1/11/2024

  
Christine Wesolowski – Supervisor  
Water Quality and Environmental Compliance  
Pennsylvania-American Water Company