

COMMONWEALTH OF PENNSYLVANIA



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January 12, 2024

Via Electronic Mail Only

The Honorable Christopher P. Pell
The Honorable John M. Coogan
Office of Administrative Law Judge
Pennsylvania Public Utility Commission
801 Market Street, Suite 4063
Philadelphia, PA 19107

Re: Pennsylvania Public Utility Commission
v.
Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 (Water)
R-2023-3043190 (Wastewater)

Dear Deputy Chief Judge Pell and Judge Coogan:

Enclosed please find copies of the Office of Consumer Advocate's Motion to Dismiss Objections and Compel Answers to OCA Interrogatories Set 26, in the above-referenced proceeding. As this Motion contains **CONFIDENTIAL** material, the **CONFIDENTIAL VERSION** will only be served upon the Company and parties that have executed a non-disclosure certificate. A public version will also be made available.

Copies have been served upon the parties as evidenced by the attached Certificate of Service.

Respectfully submitted,

/s/ Melanie J. El Atieh
Melanie J. El Atieh
Senior Assistant Consumer Advocate
PA Attorney I.D. # 309232
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Enclosures:

cc: Rosemary Chiavetta, PUC Secretary
Certificate of Service

*4894-4897-7564

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :
 : Docket Nos. R-2023-3043189 (Water)
 v. : R-2023-3043190 (Wastewater)
 :
 :
 Pennsylvania-American Water Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Motion to Dismiss Objections and Compel Answers to Interrogatories Set 26 upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below. This document was filed electronically on the Commission’s electronic filing system.

Dated this 12th day of January 2024.
*** Received Confidential Version**

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Dated: January 12, 2024

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the Company's total annual operating revenues by approximately \$203.9 million.

2. On December 21, 2023, the Commission suspended the effective date of the proposed tariffs until August 7, 2024, and assigned PAWC's general rate increase requests to the Office of Administrative Law Judge for proceedings and a Recommended Decision.

3. On January 3, 2024, the ALJs held a telephonic prehearing conference. On January 5, 2024, the ALJs issued Prehearing Order #1, which, among other things, established a compressed litigation schedule and discovery modifications that shortened the time periods for serving responses, objections, and motions to compel.

4. On January 5, 2024, the OCA issued its Set 26 Interrogatories (Set 26) to PAWC.

5. On January 8, 2024, PAWC and the OCA held a conference call where PAWC orally objected to OCA's Set 26, Question Nos. 6-7, 12, 17-19, and 21, subparts a.-b., and the OCA explained the bases for the interrogatories. PAWC notified the OCA on the call that it planned to file written objections to Interrogatories OCA-26-6, 26-7, 26-12, 26-17, 26-18, 26-19, 26-21, subparts a. and b.

6. On January 10, 2024, PAWC filed its written objections to Interrogatories OCA-26-6, 26-7, 26-12, 26-17, 26-18, 26-19, 26-21, subparts a. and b. A copy of PAWC's written objections is attached as Attachment A.

7. In accordance with paragraph 16 of the ALJs' Prehearing Order #1, the OCA files this Motion within three calendar days of the PAWC's written objection, requesting that the ALJs dismiss PAWC's objection and compel PAWC to answer Interrogatories OCA-26-6, 26-7, 26-12, 26-17, 26-18, 26-19, 26-21, subparts a. and b.

III. LEGAL STANDARD

8. Section 333(d) of the Public Utility Code permits a party to a proceeding to “serve written interrogatories upon any other party for purposes of discovering relevant, unprivileged information.” 66 Pa.C.S. § 333(d). Under the Commission’s regulations, a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action.¹ 52 Pa. Code § 5.321(c). It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence. *Id.*

9. The Commission applies the relevancy test liberally. *See Pa. P.U.C. v. The Peoples Natural Gas Co.*, 62 PaPUC 56 (Aug. 26, 1986). Relevancy depends upon the nature and the facts of the individual case. *Koken v. One Beacon Ins. Co.*, 911 A.2d 1021, 1025 (Pa. Commw. 2006) (*Koken*). Any doubts are to be resolved in favor of relevancy and permitting discovery. *Petition of the Borough of Cornwall for a Declaratory Order*, Docket No. P-2015-2476211 (Order entered Sept. 11, 2015) (citing *Koken at 1025*).

10. The burden is placed on the party objecting to discovery to establish that the information requested is not relevant or discoverable. *Id.*

11. Where there has been an objection filed to an interrogatory, the propounding party has the right to file a motion requesting that the presiding officer issue an order that dismisses the

¹ Section 5.321 outlines the scope of discovery as follows:

(c) *Scope.* Subject to this subchapter, a party may obtain discovery regarding **any matter**, not privileged, which is **relevant to the subject matter** involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the **claim or defense of another party**, including the **existence**, description, nature, content, custody, condition and location of any books, **documents**, or other tangible things and the identity and location of persons having knowledge of a discoverable matter. It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

52 Pa. Code § 5.321(c) (emphasis added).

objection and compels an answer to the interrogatory. 66 Pa.C.S. § 333(d); 52 Pa. Code § 5.432(g). The consequence to the propounding party for failure to file a motion to compel is that the objected to interrogatory will be deemed withdrawn. 52 Pa. Code § 5.432(g). The motion to compel must include the interrogatory objected to and the objection. *Id.*

IV. MOTION TO COMPEL

12. It is the OCA's responsibility to protect the interests of PAWC's consumers in matters that are properly before the Commission. In doing so, the OCA must inquire into any and all matters which may lead to the discovery of admissible evidence to support its recommendations to the Commission in this rate proceeding.

13. Absent privileged information, the OCA has the right to obtain discovery regarding any matter which is relevant to the subject matter involved in the proceeding.

14. The subject matter involved in this case includes (1) the expenses and revenues claimed by PAWC to support its claimed revenue requirement and its general rate increase requests, and (2) the adequacy and reasonableness of utility service that PAWC provides to its consumers under the Public Utility Code, including customer billing and marketing.

15. Through information obtained in discovery,² the OCA believes the following to be true:

- a. PAWC bills for warranty services (Warranty Services) that are offered and provided by a third party, non-affiliated company, named "American Water Resources, LLC" (American Water Resources) in return for a service fee.

² See PAWC's responses to OCA-08-21, attached hereto as Attachment B.

b. PAWC provides these billing services on behalf of American Water Resources pursuant to a Utility Agreement executed by and between PAWC and American Water Resources dated December 9, 2021 (Utility Agreement).³

c. American Water Resources provides the Warranty Services to PAWC customers with whom it has a service contract. The Warranty Services offered by American Water Resources include repair and maintenance services for covered water service lines owned by customers, sewer service laterals owned by customers, and in-home plumbing.

d. The Warranty Services appear as a line item on PAWC's customer bills as "Protection Programs", and in fine print on the customer bill, a disclaimer states that the "Protection programs for water, sewer, and in-home plumbing are offered by American Water Resources" and explains that the charges are not regulated by the Commission and that PAWC's regulated services will not be disconnected for nonpayment or charged late fees in connection with non-payment of the Protection Programs charges.

e. American Water Resources uses the American Water name, logo, and branding; however, American Water Resources has no legal affiliation with PAWC or its parent company, American Water Works Company, Inc. (Parent Company).

f. The Parent Company previously owned American Water Resources as a subsidiary, which means American Water Resources was once an affiliate of PAWC. However, the Parent Company sold American Water Resources to Oncourse Home Solutions and, therefore, American Water Resources is currently neither a subsidiary of Parent Company nor an affiliate of PAWC.

³ See OCA-20-16 Attachment 1- CONFIDENTIAL, attached hereto as Attachment C (CONFIDENTIAL).

g.

[REDACTED]

h.

[REDACTED]

i.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

j. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

16. Interrogatory OCA-26-6 states:

Do PAWC or American Water Works Service Company (AWWSC) or any other affiliates of PAWC perform services under contracts between PAWC customers and Oncourse Home Solutions?

- a) If so, identify the personnel at PAWC that perform such services.
- b) Identify the personnel at AWWSC that perform such services.
- c) If not, identify which entity performs the services under such contracts.

17. Interrogatory OCA 26-7 states:

Do any PAWC or American Water Works Service Company (AWWSC) or any other affiliates of PAWC perform services under contracts between PAWC customers and American Water Resources?

- a) If so, identify the personnel at PAWC that perform such services.
- b) Identify the personnel at AWWSC that perform such services.
- c) If not, identify which entity performs the services under such contracts.

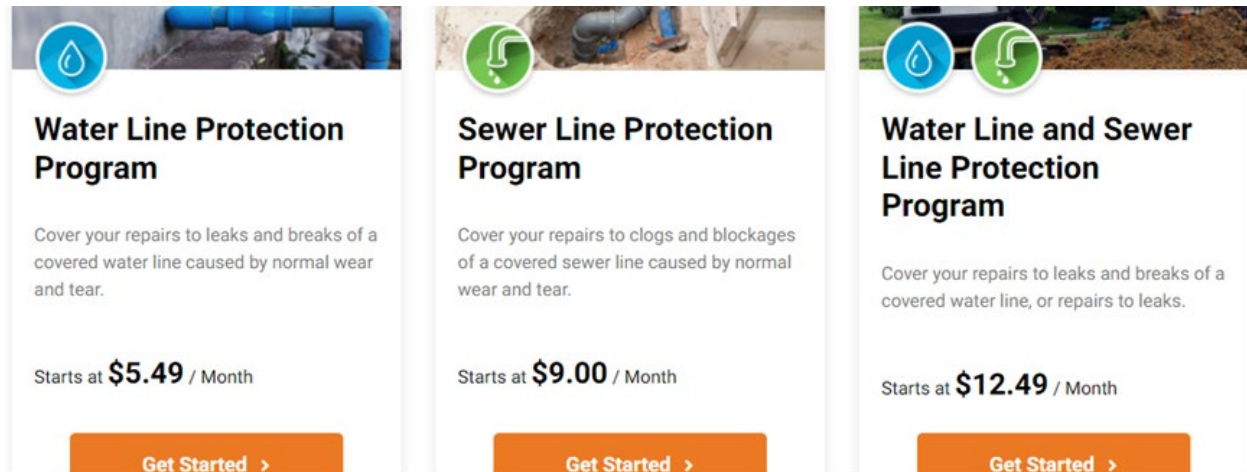
18. PAWC submits that Oncourse Home Solutions and American Water Resources are the same entity. PAWC Objections at ¶ 9. PAWC objects to Interrogatories OCA-26-6 and 26-7

because it argues that information regarding services provided by American Waterworks Service Company (Service Company) and PAWC's utility affiliates operating in other jurisdictions to Oncourse Home Solutions/American Water Resources is not relevant to the subject matter of this proceeding. PAWC asserts that its claims in this rate case must be assessed by reference to Pennsylvania law and the Commission's regulations and orders, not those of the 12 other states where PAWC' utility affiliates operate. Notwithstanding its objection, PAWC states that it is willing to answer whether PAWC performs services under contracts between PAWC customers and Oncourse Home Solutions/American Water Resources. PAWC Objections at ¶¶ 7, 9.

19. The OCA submits that Interrogatories OCA-26-6 and 26-7 seek relevant information because the Service Company allocates and charges significant costs to PAWC. If Service Company personnel are performing services for the benefit of American Water Resources and are charging or allocating any of the cost of such services to PAWC, it is relevant to the costs claimed by PAWC in this base rate case proceeding. Moreover, the OCA has reason to believe that PAWC's utility affiliates have contracts with American Water Resources like the Utility Agreement described above. From a simple web search, a number of PAWC's utility affiliates also have customer endorsements on the American Water Resources marketing website. Whether PAWC's affiliates are receiving additional compensation from American Water Resources and/or whether their contracts with American Water Resources are more beneficial than PAWC's Utility Agreement is relevant to the subject matter of this base rate case proceeding.

20. Interrogatory OCA-26-12 states:

Please refer to the following information from the American Water Resources web site:



For each month of 2022 and 2023, did PAWC apply the following charges on the bills of PAWC customers that had warranty contracts:

- a) \$5.49 per month for water line protection?
- b) \$9 per month for sewer line protection?
- c) \$12.49 per month for combined water and sewer line protection?
- d) If not, identify the amounts per month that PAWC applied on customer bills for each type of warranty contract/water and sewer line protection service.

21. PAWC objects to Interrogatory OCA-26-12 because it argues that the prices that American Water Resources charges PAWC's customers for its Warranty Services is not relevant to the subject matter of this proceeding. PAWC states that the monthly pricing information requested by the OCA is governed by contracts between PAWC's customers and American Water Resources and beyond the Company's possession, custody and control because PAWC is not a party to those agreements. PAWC Objections at ¶ 11.

22. The OCA submits that the information requested in Interrogatory OCA-26-12 is relevant because PAWC bills for the prices charged by American Water Resources on PAWC's customer bills (for customers that have a service contract with American Water Resources for Warranty Services). PAWC should know what American Water Resources' charges are given that

PAWC is the entity billing for these charges. Additionally, PAWC is collecting revenue from customers for the amounts billed for American Water Resources' charges. Pursuant to the Utility Agreement, [REDACTED]

[REDACTED] so it is relevant whether American Water Resources is charging the rates it advertises to PAWC's customers via marketing materials approved by PAWC. Moreover, given this billing arrangement, it would seem more plausible than not that PAWC's billing system could produce a report of the amounts that PAWC has billed to PAWC's customers for the Warranty Services charges of American Water Resources.

23. Interrogatory OCA-26-17 states:

In 2022 or 2023 did PAWC or any affiliate of PAWC receive any compensation from American Water Resources or Oncourse Home Solutions for the use of the "American Water" name or the American Water Works logo?

a) If not, explain fully why not.

b) If so, identify the amounts recorded by (1) PAWC and (2) American Water in each period.

24. PAWC objects to Interrogatory OCA 26-17 because it argues that the trademark licensing arrangement between the Parent Company and American Water Resources is not relevant to the subject matter of this proceeding. However, PAWC states that it is willing to answer whether PAWC received any compensation in 2022 and 2023 from American Water Resources for use of the American Water name or logo. PAWC Objections at ¶ 13.

25. The OCA submits that Interrogatory OCA-26-17 seeks relevant information. Rather than merely repeat the arguments set forth in the OCA's Motion to Compel filed on January 11, 2024, in this proceeding, the OCA incorporates by reference the arguments set forth in paragraphs 18-23 of the January 11, 2024 Motion to show that the trademark licensing arrangement

between the Parent Company and American Water Resources is indeed relevant to the subject matter of this proceeding. Moreover, given that, pursuant to the Utility Agreement [REDACTED]

[REDACTED] it is relevant whether the Parent Company is receiving compensation for American Water Resources' use of the American Water name, logo, and branding, while PAWC is not. It is also relevant if any of PAWC's utility affiliates are receiving compensation for American Water Resources' use of the American Water name, logo, and branding, while PAWC is not.

26. Interrogatory OCA-26-18 states:

Please confirm that the American Water name and logo is shown below:



a) Also please confirm that the American Water name and logo is being used on the American Water Resources/Oncourse Home Solutions web site that markets the water line, sewer line and combined water and sewer line protection plans.

27. PAWC objects to Interrogatory OCA 26-18 because it argues that trademark licensing arrangement between the Parent Company and American Water Resources is not relevant. However, PAWC states that it is willing to confirm that the American Water name and logo are shown in the OCA's request. PAWC Objections at ¶ 15.

28. The OCA submits that Interrogatory OCA-26-18 seeks relevant information. Rather than repeat the arguments set forth in the OCA's Motion to Compel filed on January 11, 2024, in this proceeding, the OCA incorporates by reference the arguments set forth in paragraphs 18-23 of the January 11, 2024 Motion to demonstrate that the trademark licensing arrangement between the Parent Company and American Water Resources is indeed relevant to the subject matter of this proceeding.

29. Interrogatory OCA-26-19 states: “Have there been any complaints to the Department of Insurance in 2022 or 2023 related to American Water Resources? If so, please identify and provide each such complaint.”

30. PAWC objects to Interrogatory OCA-26-19 because it argues that complaints filed with the Department of Insurance against American Water Resources, which is not a party to this rate proceeding, is not relevant. PAWC states that American Water Resources is no longer affiliated with the Parent Company or PAWC, and as such, American Water Resources’ complaint history with the Department of Insurance is beyond PAWC’s possession, custody, and control. PAWC Objections at ¶ 17.

31. The OCA submits that OCA-26-19 seeks relevant information because PAWC has a direct contractual relationship with American Water Resources and PAWC is billing PAWC’s customers for American Water Resources’ Warranty Services. If customers have complained about the Warranty Services that PAWC has billed to PAWC’s customers on behalf of American Water Resources, that information is certainly relevant with respect to the reasonableness of PAWC’s billing services. This request only asks about information regarding customer complaints related to American Water Resources’ Warranty Services of which PAWC is aware.

32. Interrogatory OCA-26-21 states:

How much gain or loss was realized by American Water related to the sale of American Water Resources to Oncourse Home Solutions? Identify the amount and show how it was calculated.

a) Also show how the gain (or loss) upon the sale of American Water Resources to Oncourse Home Solutions was allocated to PAWC. Include detailed calculations showing the allocation with your response.

b) In the accounting year in which the sale of American Water Resources to Oncourse Home Solutions, how was that reported by American Water Works in the AWW SEC Form 10-K?

- c) In the accounting year in which the sale of American Water Resources to Oncourse Home Solutions, what was the allocation of American Water Works Service Company costs to PAWC? Include detailed calculations showing the allocation with your response.

33. PAWC objects to Interrogatory OCA-26-21, subparts a. and b., because it argues that the gains or losses realized by the Parent Company related to the sale of American Water Resources to a third-party is not relevant. However, PAWC states that it is willing to provide a link to download the Parent Company's Form SEC 10-K that reports the sale of American Water Resources to Oncourse Home Solutions, which is publicly available on the Parent Company's website. PAWC Objections at ¶ 19.

34. The OCA submits that Interrogatory OCA-26-21, subparts a. and b., seeks relevant information because PAWC has a contract with American Water Resources, and PAWC has provided billing services to American Water Resources even when it was previously owned by the Parent Company. It is relevant to this case to identify the amount of gain on the sale of American Water Resources and to explore whether an allocated portion of that gain had been or should have been allocated to PAWC and returned to PAWC's customers as a reduction to PAWC's revenue requirement in the current case. Accordingly, the OCA's request is reasonably related to the subject matter of this proceeding. Moreover, PAWC is being inconsistent by objecting to subpart a but not subpart c. If PAWC agrees it is relevant to provide information about costs or lack thereof allocated to PAWC by the Service Company related to the sale of American Water Resources, PAWC contradicts itself by objecting to subpart a, which requests information about allocation of any gain or loss to PAWC in connection with the Parent Company's sale of American Water Resources.

35. PAWC's revenue requirement includes PAWC's claims for expenses and revenues related to billing services that PAWC provides or has provided to third-party affiliates and non-affiliates and the reasonableness of PAWC's services as it relates to utility service.

36. The relationship and services rendered between American Water Resources and PAWC, the Parent Company, the Service Company, and PAWC's utility affiliates raises concerns regarding affiliated interests, consumer protections, and billing practices. Arrangements between affiliated interests, consumer protections, and utility billing practices are properly within the scope of a base rate case. *See, e.g.*, 66 Pa. C.S. § 526(a), 1301, 1501, 2106.

37. Finally, PAWC has not met its burden of demonstrating that the information sought by OCA in Interrogatories OCA-26-6, 26-7, 26-12, 26-17, 26-18, 26-19, 26-21, subparts a. and b., is not likely to lead to admissible evidence. The Company broadly asserts that it would have to produce information that is not related to the matters addressed in this proceeding or documents not within its custody or control. However, as stated above, the information the OCA seeks is related to matters of affiliated interests, billing, consumer protection, and claims for revenues and expenses, and as such is related to this proceeding.

38. Therefore, the Company's objections should be dismissed as the OCA seeks relevant information to support its recommendations to the Commission, and PAWC has not met its burden in demonstrating that the interrogatories are not likely to lead to admissible evidence.

V. CERTIFICATION

39. The undersigned counsel for OCA certifies that they have attempted to resolve the Company's objections by undertaking the informal effort of participating on a conference call with PAWC's counsel to discuss the basis for OCA's request and the basis for PAWC's objection, but counsel for both sides were unable to reach a resolution.

VI. CONCLUSION

For the foregoing reasons, the OCA’s Interrogatories OCA-26-6, 26-7, 26-12, 26-17, 26-18, 26-19, 26-21, subparts a. and b., request relevant information. Accordingly, the OCA respectfully requests that the Presiding Officers grant this Motion to Dismiss Objection and Compel Response to Discovery and direct Pennsylvania-American Water Company to answer Interrogatories Set 26, Question Nos. 6-7, 12, 17-19, and 21, subparts a. and b., within three calendar (3) days from the date of the order.

Erin L. Gannon
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Christopher M. Andreoli
David T. Evrard
Assistant Consumer Advocates
OCAPAWC2023@paoca.org

Dated: January 12, 2024

Respectfully submitted,

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ATTACHMENT A

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January 10, 2024

VIA eFILING

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Harrisburg, PA 17120

**Re: Pennsylvania Public Utility Commission v.
Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 and R-2023-3043190**

Dear Secretary Chiavetta:

Enclosed please find, in the above-captioned proceeding, the **Certificate of Service** evidencing service upon the parties of record of the **Objections of Pennsylvania-American Water Company to the Interrogatories (Set XXVI) of the Office of Consumer Advocate**.

If you have any questions, please do not hesitate to contact me directly at 215.963.5384.

Very truly yours,



Kenneth M. Kulak

KMK/ap

Enclosures

c: Per Certificate of Service (w/encls.)

DB1/ 143569856.1

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January 10, 2024

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**Re: Pennsylvania Public Utility Commission v.
Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 and R-2023-3043190**

Dear Counsel:

Enclosed please find in the above-referenced matters, the **Objections of Pennsylvania-American Water Company to the Interrogatories (Set XXVI) of the Office of Consumer Advocate.**

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Kenneth M. Kulak

KMK/ap
Enclosures

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	
v.	:	DOCKET NOS.: R-2023-3043189 (Water)
PENNSYLVANIA-AMERICAN WATER COMPANY	:	R-2023-3043190 (Wastewater)
	:	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served a true and correct copy of the **Objections of Pennsylvania-American Water Company to the Interrogatories (Set XXVI) of the Office of Consumer Advocate** on the following persons, in the manner specified below, in accordance with the requirements of 52 Pa. Code Section 1.54:

VIA ELECTRONIC MAIL

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*Counsel for
Pennsylvania-American Water Company*

Dated: January 10, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY COMMISSION	:	
	:	
	:	DOCKET NOS. R-2023-3043189
v.	:	R-2023-3043190
	:	
PENNSYLVANIA-AMERICAN WATER COMPANY	:	
	:	

**OBJECTIONS OF PENNSYLVANIA-AMERICAN WATER COMPANY
TO THE INTERROGATORIES (SET XXVI)
OF THE OFFICE OF CONSUMER ADVOCATE**

Pursuant to 66 Pa.C.S. § 333(d) and 52 Pa. Code § 5.342, Pennsylvania-American Water Company (“PAWC” or the “Company”) hereby objects to the Twenty-Sixth Set of Interrogatories (“Set XXVI”), Nos. 6-7, 12, 17-19 and 21 (subparts a.-b.) propounded by the Office of Consumer Advocate (“OCA”) on January 5, 2024. A copy of the OCA’s Set XXVI Interrogatories is attached to these Objections as Appendix A.

I. RELEVANT BACKGROUND

1. On November 8, 2023, the Company filed Supplement No. 45 to Tariff Water – Pa. P.U.C. No. 5 (“Water Tariff Supplement”) and Supplement No. 47 to Tariff Wastewater – Pa. P.U.C. No. 16 (“Wastewater Tariff Supplement”), requesting an increase in its total annual operating revenues to become effective January 7, 2024. The amount of the requested increase equals \$203.9 million above the level of pro forma revenues for the fully projected future test year (“FPFTY”) ending June 30, 2025. The Company’s filing included the detailed supporting data required by the Pennsylvania Public Utility Commission’s (“Commission’s”) regulations at 52 Pa. Code §§ 53.52 et seq.

2. To date, the OCA has served on the Company 27 sets of interrogatories comprising a cumulative total of 591 questions with 1,327 subparts.

3. As previously noted, on January 5, 2023, the OCA issued its Set XXVI interrogatories containing Question Nos. Nos. 6-7, 12, 17-19 and 21 (subparts a.-b.) to which PAWC hereby objects because those interrogatories requests information that is not relevant to any matters properly at issue in this base rate proceeding and/or is beyond the Company's possession, custody and control.

II. OBJECTIONS

4. Section 333(d) of the Public Utility Code states, in pertinent part, as follows:

Interrogatories. – Any party to a proceeding may serve written interrogatories upon any other party for purposes of discovering *relevant*, unprivileged information.

66 Pa.C.S. § 333(d) (emphasis added)

5. The Commission's regulations at 52 Pa. Code § 5.321(c) define the permissible scope of discovery in proceedings before the Commission as follows:

Scope. Subject to this subchapter, a party may obtain discovery regarding any matter, not privileged, *which is relevant to the subject matter involved in the pending action*, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of another party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identity and location of persons having knowledge of a discoverable matter. It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence. (Emphasis added.)

6. OCA Interrogatory (Set XXVI) No. 6 states as follows:

Do PAWC or American Water Works Service Company (AWWSC) or any other affiliates of PAWC perform services under contracts between PAWC customers and Oncourse Home Solutions?

- a) If so, identify the personnel at PAWC that perform such services.
- b) Identify the personnel at AWWSC that perform such services.
- c) If not, identify which entity performs the services under such contracts.

7. PAWC objects to Interrogatory (Set XXVI) No. 6 because it would require production of information that is not reasonably related to matters addressed in this proceeding and, in particular, non-commodity services provided by American Waterworks Service Company and the Company's utility affiliates operating in other jurisdictions to an unregulated third party, Oncourse Home Solutions, and, therefore, are outside the permissible bounds of discovery set forth in 66 Pa.C.S. § 333(d) and the Commission's applicable regulations. PAWC's claims in this rate case must be assessed by reference to Pennsylvania law and the Commission's regulations and orders, not those of the 12 other states where American Water Works Company, Inc. ("American Water") utilities operate. Notwithstanding its objection, the Company is willing to state whether PAWC performs non-commodity services under contracts between PAWC customers and Oncourse Home Solutions.

8. OCA Interrogatory (Set XXVI) No. 7 states as follows:

Do PAWC or American Water Works Service Company (AWWSC) or any other affiliates of PAWC perform services under contracts between PAWC customers and American Water Resources?

- a) If so, identify the personnel at PAWC that perform such services.
- b) Identify the personnel at AWWSC that perform such services.
- c) If not, identify which entity performs the services under such contracts.

9. PAWC objects to Interrogatory (Set XXVI) No. 7 requesting information regarding non-commodity services provided by the Company’s affiliates operating in other jurisdictions to an unregulated third party, American Water Resources (“AWR”), for the same reasons set forth in Paragraph No. 7 above. AWR and Oncourse Home Solutions are the same entity. Notwithstanding its objection, the Company is willing to state whether PAWC performs non-commodity services under contracts between PAWC customers and AWR.

10. OCA Interrogatory (Set XXVI) No. 12 states as follows:

Please refer to the following information from the American Water Resources web site:

Program Name	Starts at	Frequency
Water Line Protection Program	\$5.49	Month
Sewer Line Protection Program	\$9.00	Month
Water Line and Sewer Line Protection Program	\$12.49	Month

For each month of 2022 and 2023, did PAWC apply the following charges on the bills of PAWC customers that had warranty contracts:

- a) \$5.49 per month for water line protection?
- b) \$9 per month for sewer line protection?
- c) \$12.49 per month for combined water and sewer line protection?
- d) If not, identify the amounts per month that PAWC applied on customer bills for each type of warranty contract/water and sewer line protection service.

11. PAWC objects to Interrogatory (Set XXVI) No. 12 because it would require production of information that is not reasonably related to matters addressed in this proceeding and, in particular, the prices charged by a nonregulated third party for non-commodity services under contracts with PAWC customers, and, therefore, are outside the permissible bounds of discovery set forth in 66 Pa.C.S. § 333(d) and the Commission's applicable regulations. In addition, the requested information regarding monthly pricing for water and sewer line protection services agreed to under contracts between PAWC customers and AWR, which is no longer affiliated with American Water or PAWC, is beyond the Company's possession, custody and control because PAWC is not a party to those agreements.

12. OCA Interrogatory (Set XXVI) No. 17 states as follows:

In 2022 or 2023 did PAWC or any affiliate of PAWC receive any compensation from American Water Resources or Oncourse Home Solutions for the use of the "American Water" name or the American Water Works logo?

- a) If not, explain fully why not.
- b) If so, identify the amounts recorded by (1) PAWC and (2) American Water in each period.

13. PAWC objects to Interrogatory (Set XXVI) No. 17 because it would require production of information that is not reasonably related to matters addressed in this

proceeding and, in particular, trademark licensing arrangements between PAWC's parent, American Water, and an unregulated third party, and, therefore, are outside the permissible bounds of discovery set forth in 66 Pa.C.S. § 333(d) and the Commission's applicable regulations. Notwithstanding its objection, the Company is willing to state whether PAWC received any compensation in 2022 and 2023 from AWR or Oncourse Home Solutions for the use of the American Water name or logo.

14. OCA Interrogatory (Set XXVI) No. 18 states as follows:

Please confirm that the American Water name and logo is shown below:



a) Also please confirm that the American Water name and logo is being used on the American Water Resources/Oncourse Home Solutions web site that markets the water line, sewer line and combined water and sewer line protection plans.

15. PAWC objects to Interrogatory (Set XXVI) No. 18 because it would require production of information that is not reasonably related to matters addressed in this proceeding and, in particular, trademark licensing arrangements between PAWC's parent, American Water, and an unregulated third party, and, therefore, are outside the permissible bounds of discovery set forth in 66 Pa.C.S. § 333(d) and the Commission's applicable regulations. Notwithstanding its objection, the Company is willing to confirm that the American Water name and logo is shown in Interrogatory (Set XXVI) No. 18.

16. OCA Interrogatory (Set XXVI) No. 19 states as follows:

Have there been any complaints to the Department of Insurance in 2022 or 2023 related to American Water

Resources? If so, please identify and provide each such complaint?

17. PAWC objects to Interrogatory (Set XXVI) No. 19 because it would require production of information that is not reasonably related to matters addressed in this proceeding and, in particular, complaints filed with the Department of Insurance against an unregulated entity that is not a party to this rate proceeding, and, therefore, are outside the permissible bounds of discovery set forth in 66 Pa.C.S. § 333(d) and the Commission's applicable regulations. As previously noted, AWR is no longer affiliated with American Water or PAWC. Thus, the information requested about AWR's complaint history with the Department of Insurance is also beyond the Company's possession, custody and control.

18. OCA Interrogatory (Set XXVI) No. 21 states as follows:

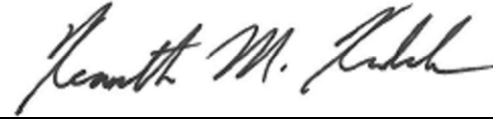
How much gain or loss was realized by American Water related to the sale of American Water Resources to Oncourse Home Solutions? Identify the amount and show how it was calculated?

- a) Also show how the gain (or loss) upon the sale of American Water Resources to Oncourse Home Solutions was allocated to PAWC. Include detailed calculations showing the allocation with your response.
- b) In the accounting year in which the sale of American Water Resources to Oncourse Home Solutions, how was that reported by American Water Works in the AWW SEC Form 10-K.
- c) In the accounting year in which the sale of American Water Resources to Oncourse Home Solutions, what was the allocation of American Water Works Service Company costs to PAWC? Include detailed calculations showing the allocation with your response.

19. PAWC objects to Interrogatory (Set XXVI) No. 21, subparts (a) and (b) because it would require production of information that is not reasonably related to matters addressed in this proceeding and, in particular, gains or losses realized by PAWC's parent, American Water, related to the sale of an unregulated business to a third party, and, therefore, are outside the permissible bounds of discovery set forth in 66 Pa.C.S. § 333(d) and the Commission's applicable regulations. Notwithstanding its objection, the Company is willing to provide a link to download the American Water Form SEC 10-K that reports the sale of AWR to Oncourse Home Solutions, which is publicly available on the American Water website.

WHEREFORE, for the foregoing reasons, PAWC's Objections to the OCA's Interrogatories (Set XXVI), No. 6-7, 12, 17-19, 21 (subparts a.-b.) should be granted.

Respectfully submitted,



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Dated: January 10, 2024

Counsel for
Pennsylvania-American Water Company

Appendix A

COMMONWEALTH OF PENNSYLVANIA



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January 5, 2024

Via Electronic Mail Only

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Re: Pennsylvania Public Utility Commission
v.
Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 (Water)
R-2023-3043190 (Wastewater)

Dear Counsel:

Enclosed you will find Interrogatories of the Office of Consumer Advocate, Set 26, in this matter.

In accordance with the discovery modifications ordered at the Prehearing Conference held on January 3, 2024, we request Pennsylvania-American Water Company provide verified answers to these inquiries within ten (10) days of service. Also, please forward the verified answers as they are completed, rather than waiting until the responses to the full set are completed.

We would appreciate it if you would communicate any objections you may have to these interrogatories as soon as possible.

Kenneth M. Kulak, Esquire
Brooke E. McGlinn, Esquire
Catherine Vasudevan, Esquire
Mark A. Lazaroff, Esquire
January 5, 2024
Page 2

We also request that you send a copy of the answers directly to our group e-mail, as listed below:

OCAPAWC2023@paoca.org

If you have any questions, please call us. By copy of this letter, copies of these interrogatories have been served upon all parties. A certificate of service showing service of these interrogatories on all parties has been filed with Secretary Chiavetta of the Pennsylvania Public Utility Commission as required by 52 Pa. Code §5.341(b).

Sincerely,



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Enclosures:

cc: PUC Secretary Rosemary Chiavetta (Letter and Certificate of Service Only)
Certificate of Service

4866-2602-7162

CERTIFICATE OF SERVICE

Pennsylvania Public Utility Commission :
 : Docket Nos. R-2023-3043189 (Water)
 v. : R-2023-3043190 (Wastewater)
 :
 :
 Pennsylvania-American Water Company :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate’s Interrogatories to Pennsylvania-American Water Company, Set 26, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below. This document was filed electronically on the Commission’s electronic filing system.

Dated this 5th day of January, 2024.

SERVICE BY E-MAIL ONLY

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Dated: January 5, 2024

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BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	Docket Nos. R-2023-3043189 (Water)
v.	:	R-2023-3043190 (Wastewater)
	:	
Pennsylvania-American Water Company	:	

INTERROGATORIES
OF THE
OFFICE OF CONSUMER ADVOCATE
SET 26

Pursuant to 52 Pa. Code § 5.341, the Office of Consumer Advocate hereby propounds the following Interrogatories to Pennsylvania-American Water Company (PAWC) to be answered by those officers, employees, agents, or contractors who have knowledge of the requested facts and who are authorized to answer on behalf of the Company. Each interrogatory is to be verified by the responding witness in accordance with 52 Pa. Code § 5.342(a)(6).

DATED: January 5, 2024

Instructions

- 1) These interrogatories shall be construed as a continuing request. The Respondent is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as first becomes available to the Respondent after the answers hereto are filed.
- 2) Restate the interrogatory immediately preceding each response.
- 3) Identify the name, title, and business address of each person(s) providing each response.
- 4) Provide the date on which the response was created.
- 5) Divulge all information that is within the knowledge, possession, control, or custody of Respondent or may be reasonably ascertained thereby. The term “Pennsylvania-American Water Company”, “Pennsylvania-American”, “PAWC”, “the Company”, or “you” as used herein includes Pennsylvania-American Water Company, its attorneys, agents, employees, contractors, or other representatives, to the extent that the Company has the right to compel the action requested herein.
- 6) Provide a verification by the responsible witness that all facts contained in the response are true and correct to the best of the witness’ knowledge, information and belief.
- 7) As used herein, but only to the extent not protected by 52 Pa. Code Section 5.323, the word “document” or “workpaper” includes, but is not limited to, the original and all copies in whatever form, stored or contained in or on whatever media or medium, including computerized memory, magnetic, electronic, or optical media, regardless of origin, and whether or not including additional writing thereon or attached thereto, and may consist of:
 - a) notations of any sort concerning conversations, telephone calls, meetings or other communications;
 - b) bulletins, transcripts, diaries, analyses, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires and surveys;
 - c) worksheets, and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing.

Pa. P.U.C. v. Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 (Water)
R-2023-3043190 (Wastewater)
Interrogatories of the Office of Consumer Advocate to PAWC
Set 26

Payroll and Vacant Positions

1. Vacant Positions. Refer to the responses to OCA 09-070, OCA 18-013, OCA 18-015 and the table below.

Line No.	Cost Center	Cost Center Description	Job	Terminated Date	Employee Subgroup	Gross Annual Payroll
1	240121	CORP-Com Relations	Community Public Relations Rep	7/18/2023	Non-Collective Bargaining Unit Hourly	\$ 48,442
2	245406	SUSQ-Field Services	Utility Technician	7/20/2023	Non-Collective Bargaining Unit Hourly	\$ 68,549
3	240106	CORP-Field Services	Admin Support Rep (N)	7/20/2023	Non-Collective Bargaining Unit Hourly	\$ 37,814
4	245106	NORR-Field Services	Utility Person A F473N	7/21/2023	Collective Bargaining Unit Hourly	\$ 64,248
5	245506	BNGR-Field Services	Utility Technician	7/21/2023	Non-Collective Bargaining Unit Hourly	\$ 68,570
6	246106	MECH-Field Services	Supvr Field Operations	7/21/2023	Non-Collective Bargaining Unit Salary	\$ 87,493
7	242106	MCMR-Field Services	Subforeperson U5370	7/31/2023	Collective Bargaining Unit Hourly	\$ 75,732
8	249106	WILK-Field Services	Leak Detection Specialist U648S	7/31/2023	Collective Bargaining Unit Hourly	\$ 67,275
9	245103	NORR-Cust Service	Serviceperson F473N	7/31/2023	Collective Bargaining Unit Hourly	\$ 67,839
10	245206	YARD-Field Services	Utility B F473Y	7/31/2023	Collective Bargaining Unit Hourly	\$ 55,144
11	245601	NAZA-Production	Lead Plant Operator	8/4/2023	Non-Collective Bargaining Unit Hourly	\$ 75,147
12	246206	HSHY-Field Services	Supvr Field Operations	8/9/2023	Non-Collective Bargaining Unit Hourly	\$ 80,176
13	246152	MECH-Silver Springs	Maint & Relief U648R	8/11/2023	Collective Bargaining Unit Hourly	\$ 61,888
14	241106	PITT-Field Services	Auto Mechanic U437P	8/18/2023	Collective Bargaining Unit Hourly	\$ 72,495
15	241151	PITT-Production Hays	Assistant Operator/Maintenance (Rotating)	8/18/2023	Collective Bargaining Unit Hourly	\$ 65,041
16	241201	MCKEWW-Production	Operator UWUA 433	8/21/2023	Collective Bargaining Unit Hourly	\$ 76,358
17	241152	PITT-Production Aldr	Head Maintenance Person (Non-Rotating) U	8/31/2023	Collective Bargaining Unit Hourly	\$ 75,857
18	249161	WILK-Huntville	Plant Operator U648S	8/31/2023	Collective Bargaining Unit Hourly	\$ 71,284
19	249158	WILK-Lake Scranton	Maintenance/Relief Operator U648S	8/31/2023	Collective Bargaining Unit Hourly	\$ 69,196
20	245106	MECH-Field Services	Utility A U648R	8/31/2023	Collective Bargaining Unit Hourly	\$ 69,259
21	241103	PITT-Cust Service	Field Representative U537P	8/31/2023	Collective Bargaining Unit Hourly	\$ 73,790
22	242306	UNTN-Field Services	Utility Person U5370	8/31/2023	Collective Bargaining Unit Hourly	\$ 75,189
23	241106	PITT-Field Services	Utility Equipment Operator U537P	8/31/2023	Collective Bargaining Unit Hourly	\$ 64,164
24	245101	NORR-Production	Maint & Relief F473N	9/1/2023	Collective Bargaining Unit Hourly	\$ 60,322
25	240117	CORP-Water Quality	Supvr WQ & Env Compliance	9/3/2023	Non-Collective Bargaining Unit Salary	\$ 78,660
26	246151	MECH-ProdWestShore	Supvr Production	9/12/2023	Non-Collective Bargaining Unit Salary	\$ 76,808
27	249201	Scranton WW-Prod	Maintenance Relief Operator	9/22/2023	Collective Bargaining Unit Hourly	\$ 60,510
28	241301	EXTRWW-Production	Wastewater Operator	9/22/2023	Non-Collective Bargaining Unit Hourly	\$ 75,377
29	246206	HSHY-Field Services	Utility Person	9/29/2023	Non-Collective Bargaining Unit Hourly	\$ 71,451
30	249206	Scrntn-WW-Fld Svc	Operations Specialist	9/29/2023	Non-Collective Bargaining Unit Hourly	\$ 60,218
31	241106	PITT-Field Services	Supvr Field Operations	9/29/2023	Non-Collective Bargaining Unit Salary	\$ 80,000
32	245206	YARD-Field Services	Utility A F437Y	9/30/2023	Collective Bargaining Unit Hourly	\$ 65,166
33	240116	CORP-Maint Services	Sr Automation & Controls Tech	9/30/2023	Non-Collective Bargaining Unit Hourly	\$ 87,195
34	240117	CORP-Water Quality	Supvr WQ & Env Compliance	10/4/2023	Non-Collective Bargaining Unit Salary	\$ 82,000
35	249150	WILK-Other	Operations Specialist	10/6/2023	Non-Collective Bargaining Unit Hourly	\$ 64,728
36	240114	CORP-Engineering	Engineering Project Manager	10/9/2023	Non-Collective Bargaining Unit Salary	\$ 81,510
37	248701	Nw Cmbmind WW Prod	Lead Plant Operator	10/20/2023	Non-Collective Bargaining Unit Hourly	\$ 69,029
38	240114	CORP-Engineering	GIS Analyst	10/27/2023	Non-Collective Bargaining Unit Hourly	\$ 54,288
39	241106	PITT-Field Services	Maintenance Mechanic/Welder U537P	10/31/2023	Collective Bargaining Unit Hourly	\$ 74,040
40	243103	NEWC-Cust Service	Distribution System Serviceperson U5370	10/31/2023	Collective Bargaining Unit Hourly	\$ 75,419
41	241106	PITT-Field Services	Utility Person U537P	10/31/2023	Collective Bargaining Unit Hourly	\$ 73,706
42	249103	WILK-Cust Service	Serviceperson U648S	10/31/2023	Collective Bargaining Unit Hourly	\$ 69,155
43	249106	WILK-Field Services	Regulation Utility Person U648S	11/7/2023	Collective Bargaining Unit Hourly	\$ 65,960
44	245801	POWW-Production	Maintenance/Relief Operator	11/8/2023	Non-Collective Bargaining Unit Hourly	\$ 59,445
45	249152	WILK-Ceasetown	Plant Operator U648S	11/19/2023	Collective Bargaining Unit Hourly	\$ 66,064
46	240106	CORP-Field Services	Spec Bill/Pymt Collection (N)	11/20/2023	Non-Collective Bargaining Unit Hourly	\$ 50,718
47	247150	MILT-Prod Other	Maintenance/Relief Operator	11/20/2023	Non-Collective Bargaining Unit Hourly	\$ 62,661
48	249152	WILK-Ceasetown	Plant Operator U648S	11/24/2023	Collective Bargaining Unit Hourly	\$ 67,108
49	247150	MILT-Prod Other	Maintenance/Relief Operator	11/27/2023	Non-Collective Bargaining Unit Hourly	\$ 66,837
50					Total	\$ 3,369,328

Source: OCA 09-070 Attachment, page 3 of 3

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- a) Referring to the above table (from page 3 of the OCA 09-070 Attachment), please reconcile each of the 49 positions listed to the Volume 4, 4c Compensation Adjustment Excel file. Identify, quantify and explain each reconciling item.
- b) For each of the 49 terminated/vacant positions listed in the above table, which positions have been filled to date? For each such position, identify the annual payroll amount in the FPFTY and the date upon which each position was filled.
- c) Please identify in a manner similar to page 3 of the OCA 09-070 Attachment, any additional positions that became vacant after November 27, 2023. For each additional position that has become vacant, provide the related annual payroll amounts in the FPFTY.

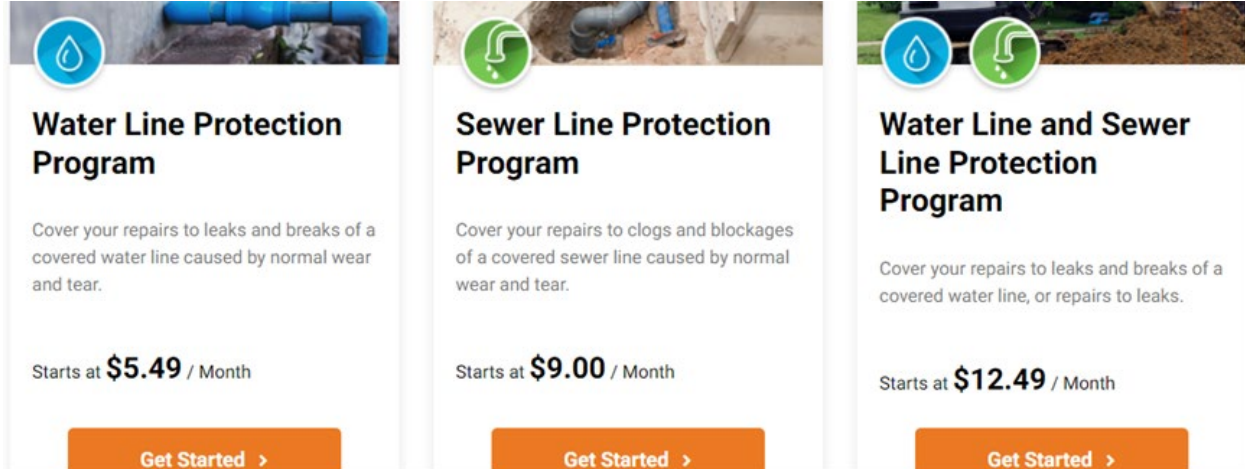
Accounting Information Related to Oncourse Home Solutions and American Water Resources

Refer to the responses to OCA 20-016, OCA 20-018, OCA 20-010 and OCA 20-023.

2. Identify and provide all invoices to and from Oncourse Home Solutions in 2022 and 2023.
3. Identify and provide all invoices to and from American Water Resources in 2022 and 2023.
4. Identify by amount and account all amounts recorded in PAWC's books by month in 2022 and 2023 related to Oncourse Home Solutions.
5. Identify by amount and account all amounts budgeted/forecasted by PAWC's books by related to Oncourse Home Solutions for the FTY and the FPFTY.
6. Do PAWC or American Water Works Service Company (AWWSC) or any other affiliates of PAWC perform services under contracts between PAWC customers and Oncourse Home Solutions?
 - a) If so, identify the personnel at PAWC that perform such services.
 - b) Identify the personnel at AWWSC that perform such services.
 - c) If not, identify which entity performs the services under such contracts.
7. Do any PAWC or American Water Works Service Company (AWWSC) or any other affiliates of PAWC perform services under contracts between PAWC customers and American Water Resources?
 - a) If so, identify the personnel at PAWC that perform such services.

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- b) Identify the personnel at AWWSC that perform such services.
 - c) If not, identify which entity performs the services under such contracts.
8. During each month of 2022 and 2023 how many PAWC customers had warranty contracts with American Water Resources for (1) water, (2) sewer, and (3) water and sewer?
9. During each month of 2022 and 2023 how many PAWC customers had warranty contracts with Oncourse Home Solutions for (1) water, (2) sewer, and (3) water and sewer?
10. During each month of 2022 and 2023 how many PAWC customers did PAWC bill for warranty contracts with American Water Resources for (1) water, (2) sewer, and (3) water and sewer?
11. During each month of 2022 and 2023 how many PAWC customers did PAWC bill for warranty contracts with Oncourse Home Solutions for (1) water, (2) sewer, and (3) water and sewer?
12. Please refer to the following information from the American Water Resources web site:



For each month of 2022 and 2023, did PAWC apply the following charges on the bills of PAWC customers that had warranty contracts:

- a) \$5.49 per month for water line protection?
- b) \$9 per month for sewer line protection?
- c) \$12.49 per month for combined water and sewer line protection?
- d) If not, identify the amounts per month that PAWC applied on customer bills for each type of warranty contract/water and sewer line protection service.

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13. During 2022 and 2023 did PAWC have any uncollectibles related to warranty service?
 - a) If so, how much? Show amounts that PAWC recorded in each account in each year.
14. For the FTY and the FPFTY did PAWC budget/forecast any uncollectibles related to warranty service?
 - a) If so, how much? Show amounts that PAWC recorded in each account in each period.
15. For the HTY and separately for calendar 2022 and calendar 2023, what amounts of (1) revenue and (2) expenses did PAWC record related to warranty services?
16. For the FTY and the FPFTY what amounts has PAWC budgeted/forecasted for (1) revenue and (2) expenses related to warranty service?
 - a) Show amounts that PAWC budgeted/forecasted in each account in each period.
17. In 2022 or 2023 did PAWC or any affiliate of PAWC receive any compensation from American Water Resources or Oncourse Home Solutions for the use of the “American Water” name or the American Water Works logo?
 - a) If not, explain fully why not.
 - b) If so, identify the amounts recorded by (1) PAWC and (2) American Water in each period.
18. Please confirm that the American Water name and logo is shown below:



- a) Also please confirm that the American Water name and logo is being used on the American Water Resources/Oncourse Home Solutions web site that markets the water line, sewer line and combined water and sewer line protection plans.
19. Have there been any complaints to the Department of Insurance in 2022 or 2023 related to American Water Resources? If so, please identify and provide each such complaint.
20. Refer to the response to OCA 20-023 and to Exhibit 3-A. Referring to the amounts shown for account 471, Misc. Service Revenues, for the 12-month ended periods June 30, 2023, June 30, 2024 and June 30, 2025 respectively:
 - a) How much of those revenues in each period are for the American Water Resources/Oncourse Home Solutions protection services?

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- b) How much of those revenues in each period are for PAWC providing billing and collection services for American Water Resources/Oncourse Home Solutions?
 - c) What other amounts (not covered in parts a or b) are included in the account 471 amounts? Identify and explain in detail.
21. How much gain or loss was realized by American Water related to the sale of American Water Resources to Oncourse Home Solutions? Identify the amount and show how it was calculated.
- a) Also show how the gain (or loss) upon the sale of American Water Resources to Oncourse Home Solutions was allocated to PAWC. Include detailed calculations showing the allocation with your response.
 - b) In the accounting year in which the sale of American Water Resources to Oncourse Home Solutions, how was that reported by American Water Works in the AWW SEC Form 10-K?
 - c) In the accounting year in which the sale of American Water Resources to Oncourse Home Solutions, what was the allocation of American Water Works Service Company costs to PAWC? Include detailed calculations showing the allocation with your response.

Call Center Related Accounting Information Requests

Refer to pages 80-84 of the Management Audit Report and to PAWC's responses to the following DRs: OCA set 6, items 5, 6, 7, 8 and OCA set 20, items 1, 3, 8 and 10.

22. For each third party call center contractor listed in the responses to OCA 06-005 and OCA 06-006 provide the following information:
- a) by amount and account all amounts recorded in PAWC's books by month in 2022 and 2023.
 - b) by amount and account all amounts recorded in PAWC's books by month in the HTY.
 - c) by amount and account all amounts budgeted/forecasted by PAWC for (1) the FTY and (2) the FPPTY.
23. For each third party call center contractor listed in the responses to OCA 06-005 and OCA 06-006 provide all 2022 and 2023 invoices, including invoice attachment detail.

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24. The Management Audit report at page 80 states that “AWWSC Customer Care maintains a virtual call center that routes calls through an interactive Voice Response system, offering both self-service options and CSR assistance.” Identify by account and amount the charges to PAWC for the AWWSC Customer Care call center:
- a) Recorded by PAWC by account in each year, 2022 and 2023.
 - b) Identify by account and amount the charges recorded by PAWC for the AWWSC call center in the HTY.
 - c) Identify by account and amount the charges budgeted/forecast by PAWC for the AWWSC call center in (1) the FTY and (2) the FPFTY.
 - d) Identify and provide invoices and billing detail from AWWSC to PAWC for the amounts shown in the responses to parts a, b and c, above.

Depreciation Rates and Depreciation Expense

25. Please confirm that in its last rate case PAWC proposed water depreciation rates for the HTY (calendar 2021), FTY(calendar 2022) and FPFTY (calendar 2023) in that case as summarized in the following table. If any of this cannot be confirmed, please show the water depreciation rates that PAWC proposed in its last rate case for each period (HTY, FTY and FPFTY):

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Account No.	Description	2022 Rate Case		
		December 31, 2021 (A)	December 31, 2022 (B)	December 31, 2023 (C)
303.14	WATER RIGHTS - HIBERNIA	25-SQ	25-SQ	25-SQ
303.35	WASTE HANDLING AND TREATMENT LAND	100-R2	100-R2	100-R2
303.99	COMPREHENSIVE PLANNING STUDIES	5-SQ	5-SQ	5-SQ
304.15	OTHER WATER SOURCE STRUCTURES	60-R1.5	60-R1.5	60-R1.5
304.20	POWER AND PUMING STRUCTURES			
	LARGE STRUCTURES	75-R2	75-R2	75-R2
	OTHER STRUCTURES	55-R3	55-R3	55-R3
304.30	PURIFICATION BUILDINGS			
	LARGE STRUCTURES	70-S0.5	70-S0.5	70-S0.5
	OTHER STRUCTURES	60-R3	60-R3	60-R3
304.36	WASTE HANDLING AND TREATMENT STRUCTURES	60-S2.5	60-S2.5	60-S2.5
304.38	WASTE HANDLING AND TREATMENT STRUCTURES PAINTING	10-SQ	10-SQ	10-SQ
304.39	PURIFICATION BUILDINGS - TANK PAINTING	10-SQ	10-SQ	10-SQ
304.61	OFFICE BUILDINGS			
	LARGE STRUCTURES	55-R1.5	55-R1.5	55-R1.5
	OTHER STRUCTURES	50-R3	50-R3	50-R3
304.62	STORES, SHOP AND GARAGE BUILDINGS			
	LARGE STRUCTURES	55-S0.5	55-S0.5	55-S0.5
	OTHER STRUCTURES	45-R3	45-R3	45-R3
304.63	MISCELLANEOUS STRUCTURES AND IMPROVEMENTS	35-S0.5	35-S0.5	35-S0.5
305.00	COLLECTING AND IMPOUNDING RESERVOIRS			
	LARGE RESERVOIRS	125-R2	125-R2	125-R2
	OTHER RESERVOIRS	75-R3	75-R3	75-R3
306.00	LAKE, RIVER AND OTHER INTAKES			
	LARGE RESERVOIRS	55-S1	55-S1	55-S1
	OTHER RESERVOIRS	50-S0.5	50-S0.5	50-S0.5
307.00	WELLS AND SPRINGS	55-S0	55-S0	55-S0
310.00	POWER GENERATION EQUIPMENT	43-S1	43-S1	43-S1
	PUMPING EQUIPMENT			
311.20	ELECTRIC	42-S0	42-S0	42-S0
311.50	OTHER	42-S0	42-S0	42-S0
311.52	SOURCE OF SUPPLY	42-S0	42-S0	42-S0
311.53	WATER TREATMENT	42-S0	42-S0	42-S0
311.54	TRANSMISSION AND DISTRIBUTION	42-S0	42-S0	42-S0
	PURIFICATION SYSTEM			
320.10	LARGE STRUCTURES			
	LARGE STRUCTURES	60-S0.5	60-S0.5	60-S0.5
	OTHER STRUCTURES	55-R3	55-R3	55-R3
320.18	LARGE STRUCTURES PAINT	10-SQ	10-SQ	10-SQ
320.19	LARGE STRUCTURES PAINT	10-SQ	10-SQ	10-SQ
320.20	CHEMICAL TREATMENT	36-R0.5	36-R0.5	36-R0.5
320.29	CHEMICAL TREATMENT PAINT	FULLY ACCRUED	FULLY ACCRUED	FULLY ACCRUED
320.30	GRANULAR ACTIVATED CARBON	7-L2	7-L2	7-L2
320.37	WASTE HANDLING AND TREATMENT - EQUIPMENT	30-R3	30-R3	30-R3
330.00	DISTRIBUTION RESERVOIRS AND STANDPIPES	65-S0.5	65-S0.5	65-S0.5
330.10	ELEVATED TANKS AND STANDPIPES	65-S0.5	65-S0.5	65-S0.5
330.20	GROUND LEVEL FACILITIES	65-S0.5	65-S0.5	65-S0.5
330.30	BELOW GRADE FACILITIES	65-S0.5	65-S0.5	65-S0.5
330.40	CLEARWELL	65-S0.5	65-S0.5	65-S0.5
330.58	DISTRIBUTION RESERVOIRS AND STANDPIPES - PAINTING	10-SQ	10-SQ	10-SQ
330.59	DISTRIBUTION RESERVOIRS AND STANDPIPES - PAINTING	10-SQ	10-SQ	10-SQ
331.00	MAINS AND ACCESSORIES	110-R2	110-R2	110-R2
333.00	SERVICES	70-R2.5	70-R2.5	70-R2.5
334.00	METERS AND METER INSTALLATIONS	21-L1	21-L1	21-L1
335.00	FIRE HYDRANTS	75-R2.5	75-R2.5	75-R2.5

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340.00	OFFICE FURNITURE AND EQUIPMENT			
	FURNITURE	20-SQ	20-SQ	20-SQ
	COMPUTERS AND PERIPHERAL EQUIPMENT	5-SQ	5-SQ	5-SQ
	COMPUTER SOFTWARE	5-SQ	5-SQ	5-SQ
	COMPUTER SOFTWARE - BUSINESS TRANSFORMATION	10-SQ	10-SQ	10-SQ
	OTHER OFFICE EQUIPMENT	10-SQ	10-SQ	10-SQ
341.00	TRANSPORATION EQUIPMENT			
	NOT CLASSIFIED	7-L3	7-L3	7-L3
	LIGHT DUTY TRUCKS	7-L3	7-L3	7-L3
	EQUIPMENT	7-L3	7-L3	7-L3
	AUTOS	7-L3	7-L3	7-L3
	OTHER	7-L3	7-L3	7-L3
342.00	STORES EQUIPMENT	20-SQ	20-SQ	20-SQ
343.00	TOOLS AND WORK EQUIPMENT	20-SQ	20-SQ	20-SQ
344.00	LABORATORY EQUIPMENT	20-L0.5	20-L0.5	20-L0.5
345.00	POWER OPERATED EQUIPMENT	19-S0.5	19-S0.5	19-S0.5
346.00	COMMUNICATION EQUIPMENT			
	EQUIPMENT	15-SQ	15-SQ	15-SQ
	NON-TELEPHONE	15-SQ	15-SQ	15-SQ
	REMOTE CONTROL AND INSTRUMENTATION	10-SQ	10-SQ	10-SQ
	TELEPHONE	10-SQ	10-SQ	10-SQ
347.00	MISCELLANEOUS EQUIPMENT	25-SQ	25-SQ	25-SQ
348.00	OTHER TANGIBLE EQUIPMENT	25-SQ	25-SQ	25-SQ

Notes and Source:

Col. A: 2022 PAWC Rate Case, Exhibit 11-A
Col. B: 2022 PAWC Rate Case, Exhibit 11-B
Col. C: 2022 PAWC Rate Case, Exhibit 11-C

26. For PAWC's current rate case, for water depreciation rates, please confirm that Gannett Fleming shows the following depreciation rates for each of the accounts listed in the following table. If any of this cannot be confirmed, please show what PAWC believes are the BASA depreciation rates that are being proposed in the current PAWC rate case based on the Gannett Fleming depreciation rate study for each of the following accounts in each period (HTY, FTY and FPFTY):

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Account No.	Description	2022 Rate Case		
		December 31, 2021 (A)	December 31, 2022 (B)	December 31, 2023 (C)
303.14	WATER RIGHTS - HIBERNIA	25-SQ	25-SQ	25-SQ
303.35	WASTE HANDLING AND TREATMENT LAND	100-R2	100-R2	100-R2
303.99	COMPREHENSIVE PLANNING STUDIES	5-SQ	5-SQ	5-SQ
304.15	OTHER WATER SOURCE STRUCTURES	60-R1.5	60-R1.5	60-R1.5
304.20	POWER AND PUMING STRUCTURES			
	LARGE STRUCTURES	75-R2	75-R2	75-R2
	OTHER STRUCTURES	55-R3	55-R3	55-R3
304.30	PURIFICATION BUILDINGS			
	LARGE STRUCTURES	70-S0.5	70-S0.5	70-S0.5
	OTHER STRUCTURES	60-R3	60-R3	60-R3
304.36	WASTE HANDLING AND TREATMENT STRUCTURES	60-S2.5	60-S2.5	60-S2.5
304.38	WASTE HANDLING AND TREATMENT STRUCTURES PAINTING	10-SQ	10-SQ	10-SQ
304.39	PURIFICATION BUILDINGS - TANK PAINTING	10-SQ	10-SQ	10-SQ
304.61	OFFICE BUILDINGS			
	LARGE STRUCTURES	55-R1.5	55-R1.5	55-R1.5
	OTHER STRUCTURES	50-R3	50-R3	50-R3
304.62	STORES, SHOP AND GARAGE BUILDINGS			
	LARGE STRUCTURES	55-S0.5	55-S0.5	55-S0.5
	OTHER STRUCTURES	45-R3	45-R3	45-R3
304.63	MISCELLANEOUS STRUCTURES AND IMPROVEMENTS	35-S0.5	35-S0.5	35-S0.5
305.00	COLLECTING AND IMPOUNDING RESERVOIRS			
	LARGE RESERVOIRS	125-R2	125-R2	125-R2
	OTHER RESERVOIRS	75-R3	75-R3	75-R3
306.00	LAKE, RIVER AND OTHER INTAKES			
	LARGE RESERVOIRS	55-S1	55-S1	55-S1
	OTHER RESERVOIRS	50-S0.5	50-S0.5	50-S0.5
307.00	WELLS AND SPRINGS	55-S0	55-S0	55-S0
310.00	POWER GENERATION EQUIPMENT	43-S1	43-S1	43-S1
	PUMPING EQUIPMENT			
311.20	ELECTRIC	42-S0	42-S0	42-S0
311.50	OTHER	42-S0	42-S0	42-S0
311.52	SOURCE OF SUPPLY	42-S0	42-S0	42-S0
311.53	WATER TREATMENT	42-S0	42-S0	42-S0
311.54	TRANSMISSION AND DISTRIBUTION	42-S0	42-S0	42-S0
	PURIFICATION SYSTEM			
320.10	LARGE STRUCTURES			
	LARGE STRUCTURES	60-S0.5	60-S0.5	60-S0.5
	OTHER STRUCTURES	55-R3	55-R3	55-R3
320.18	LARGE STRUCTURES PAINT	10-SQ	10-SQ	10-SQ
320.19	LARGE STRUCTURES PAINT	10-SQ	10-SQ	10-SQ
320.20	CHEMICAL TREATMENT	36-R0.5	36-R0.5	36-R0.5
320.29	CHEMICAL TREATMENT PAINT	FULLY ACCRUED	FULLY ACCRUED	FULLY ACCRUED
320.30	GRANULAR ACTIVATED CARBON	7-L2	7-L2	7-L2
320.37	WASTE HANDLING AND TREATMENT - EQUIPMENT	30-R3	30-R3	30-R3
330.00	DISTRIBUTION RESERVOIRS AND STANDPIPES	65-S0.5	65-S0.5	65-S0.5
330.10	ELEVATED TANKS AND STANDPIPES	65-S0.5	65-S0.5	65-S0.5
330.20	GROUND LEVEL FACILITIES	65-S0.5	65-S0.5	65-S0.5
330.30	BELOW GRADE FACILITIES	65-S0.5	65-S0.5	65-S0.5
330.40	CLEARWELL	65-S0.5	65-S0.5	65-S0.5
330.58	DISTRIBUTION RESERVOIRS AND STANDPIPES - PAINTING	10-SQ	10-SQ	10-SQ
330.59	DISTRIBUTION RESERVOIRS AND STANDPIPES - PAINTING	10-SQ	10-SQ	10-SQ
331.00	MAINS AND ACCESSORIES	110-R2	110-R2	110-R2
333.00	SERVICES	70-R2.5	70-R2.5	70-R2.5
334.00	METERS AND METER INSTALLATIONS	21-L1	21-L1	21-L1
335.00	FIRE HYDRANTS	75-R2.5	75-R2.5	75-R2.5

Pa. P.U.C. v. Pennsylvania-American Water Company
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340.00	OFFICE FURNITURE AND EQUIPMENT			
	FURNITURE	20-SQ	20-SQ	20-SQ
	COMPUTERS AND PERIPHERAL EQUIPMENT	5-SQ	5-SQ	5-SQ
	COMPUTER SOFTWARE	5-SQ	5-SQ	5-SQ
	COMPUTER SOFTWARE - BUSINESS TRANSFORMATION	10-SQ	10-SQ	10-SQ
	OTHER OFFICE EQUIPMENT	10-SQ	10-SQ	10-SQ
341.00	TRANSPORATION EQUIPMENT			
	NOT CLASSIFIED	7-L3	7-L3	7-L3
	LIGHT DUTY TRUCKS	7-L3	7-L3	7-L3
	EQUIPMENT	7-L3	7-L3	7-L3
	AUTOS	7-L3	7-L3	7-L3
	OTHER	7-L3	7-L3	7-L3
342.00	STORES EQUIPMENT	20-SQ	20-SQ	20-SQ
343.00	TOOLS AND WORK EQUIPMENT	20-SQ	20-SQ	20-SQ
344.00	LABORATORY EQUIPMENT	20-L0.5	20-L0.5	20-L0.5
345.00	POWER OPERATED EQUIPMENT	19-S0.5	19-S0.5	19-S0.5
346.00	COMMUNICATION EQUIPMENT			
	EQUIPMENT	15-SQ	15-SQ	15-SQ
	NON-TELEPHONE	15-SQ	15-SQ	15-SQ
	REMOTE CONTROL AND INSTRUMENTATION	10-SQ	10-SQ	10-SQ
	TELEPHONE	10-SQ	10-SQ	10-SQ
347.00	MISCELLANEOUS EQUIPMENT	25-SQ	25-SQ	25-SQ
348.00	OTHER TANGIBLE EQUIPMENT	25-SQ	25-SQ	25-SQ

Notes and Source:

Col. A: 2022 PAWC Rate Case, Exhibit 11-A
Col. B: 2022 PAWC Rate Case, Exhibit 11-B
Col. C: 2022 PAWC Rate Case, Exhibit 11-C

Pa. P.U.C. v. Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 (Water)
R-2023-3043190 (Wastewater)
Interrogatories of the Office of Consumer Advocate to PAWC
Set 26

27. For PAWC’s proposed acquisition of BASA in Docket No. A-2022-3037047, please confirm that Gannett Fleming used the following depreciation rates for each of the accounts listed in the following table. If any of this cannot be confirmed, please show what PAWC believes were the Gannett Fleming depreciation rates in the BASA acquisition case for each of the following accounts:

Account No.	Description	Survivor Curve
353.00	LAND AND LAND RIGHTS	NONDEPRECIABLE
354.30	STRUCTURES AND IMPROVEMENTS - PUMPING	65-R3
354.40	STRUCTURES AND IMPROVEMENTS - TREATMENT	70-R2.5
355.00	POWER GENERATION EQUIPMENT	30-S2
360.10	FORCE MAINS	70-R2.5
361.10	GRAVITY MAINS	65-R2.5
361.12	MANHOLES	60-R3
363.20	SERVICES TO CUSTOMERS	55-R2.5
364.30	METERS	30-L3
371.30	PUMPING EQUIPMENT	40-R1.5
371.40	GRINDER PUMP EQUIPMENT	10-R1.5
380.00	TREATMENT AND DISPOSAL EQUIPMENT	45-S0.5
382.00	OUTFALL SEWERS	70-R2.5
390.00	OFFICE FURNITURE AND EQUIPMENT	20-SQ
390.70	COMPUTERS AND PRINTERS	5-SQ
391.70	TRANSPORTATION EQUIPMENT	11-S1.5
395.70	POWER OPERATED EQUIPMENT	15-L2.5
396.00	COMMUNICATION EQUIPMENT	15-SQ
397.70	MISCELLANEOUS EQUIPMENT	15-SQ

Notes and Source:

PAWC-BASA Section 1329, Docket No. A-2022-3037047, Gannett Fleming Exhibit 7, page 3

Pa. P.U.C. v. Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 (Water)
R-2023-3043190 (Wastewater)
Interrogatories of the Office of Consumer Advocate to PAWC
Set 26

28. For PAWC’s current rate case, for BASA sewer depreciation rates, please confirm that Gannett Fleming shows the following depreciation rates for each of the accounts listed in the following table. If any of this cannot be confirmed, please show what PAWC believes are the BASA depreciation rates that are being proposed in the current PAWC rate case based on the Gannett Fleming depreciation rate study for each of the following accounts in each period (HTY, FTY and FPFTY):

Account No.	Description	2023 Rate Case	
		June 30, 2024 (A)	June 30, 2025 (B)
354.20	STRUCTURES AND IMPROVEMENTS - COLLECTION	45-R3	45-R3
354.30	STRUCTURES AND IMPROVEMENTS - SPP	55-S0	55-S0
354.40	STRUCTURES AND IMPROVEMENTS - TDP	55-S0	55-S0
354.70	STRUCTURES AND IMPROVEMENTS - GENERAL	35-S1	35-S1
355.00	POWER GENERATING EQUIPMENT	35-S0.5	35-S0.5
360.10	COLLECTION SEWERS - FORCE MAINS	75-R3	75-R3
361.10	COLLECTION SEWERS - GRAVITY MAINS	80-R2.5	80-R2.5
361.20	MANHOLES	50-S2.5	50-S2.5
363.00	SERVICES	47-R3	47-R3
364.00	FLOW MEASURING DEVICES	15-L2.5	15-L2.5
371.00	PUMPING EQUIPMENT	30-S0.5	30-S0.5
380.00	TREATMENT EQUIPMENT	35-S1.5	35-S1.5
382.00	OUTFALL SEWER LINES	50-R3	50-R3
390.00	OFFICE FURNITURE AND EQUIPMENT	20-SQ	20-SQ
390.20	COMPUTER AND PERIPHERAL EQUIPMENT	5-SQ	5-SQ
391.00	TRANSPORTATION EQUIPMENT	14-L4	14-L4
393.00	TOOLS, SHOP AND GARAGE EQUIPMENT	20-SQ	20-SQ
395.00	POWER OPERATED EQUIPMENT	22-R2	22-R2
396.00	COMMUNICATION EQUIPMENT	15-SQ	15-SQ
397.00	MISCELLANEOUS EQUIPMENT	15-SQ	

Notes and Source:

Col. A: 2023 PAWC Rate Case, Exhibit 11-G
Col. B: 2023 PAWC Rate Case, Exhibit 11-H

Pa. P.U.C. v. Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 (Water)
R-2023-3043190 (Wastewater)
Interrogatories of the Office of Consumer Advocate to PAWC
Set 26

29. For PAWC’s proposed acquisition of Brentwood in Docket No. A-2021-3024058, please confirm that Gannett Fleming used the following depreciation rates for each of the accounts listed in the following table. If any of this cannot be confirmed, please show what PAWC believes were the Gannett Fleming depreciation rates in the Brentwood acquisition case for each of the following accounts:

Account No.	Description	Survivor Curve
353.20	LAND AND LAND RIGHTS	NONDEPRECIABLE
361.10	GRAVITY MAINS	70-R2.5
361.12	COLLECTION SEWERS - GRAVITY - MAINS RELINING	50-R2.5
361.20	GRAVITY MAINS MANHOLES	65-R3
363.20	SERVICES TO CUSTOMERS	60-R2.5

Notes and Source:

PAWC-Brentwood Section 1329, Docket No. A-2021-3024058, Gannett Fleming Exhibit 7, page 3

30. For PAWC’s current rate case, for BASA sewer depreciation rates, please confirm that Gannett Fleming shows the following depreciation rates for each of the accounts listed in the following table. If any of this cannot be confirmed, please show what PAWC believes are the BASA depreciation rates that are being proposed in the current PAWC rate case based on the Gannett Fleming depreciation rate study for each of the following accounts in each period (FTY and FPFTY):

Account No.	Description	2023 Rate Case	
		June 30, 2024 (A)	June 30, 2025 (B)
361.10	COLLECTION SEWERS - GRAVITY MAINS	80-R2.5	80-R2.5
361.20	MANHOLES	50-S2.5	50-S2.5
363.00	SERVICES	47-R3	47-R3
390.00	OFFICE FURNITURE AND EQUIPMENT	20-SQ	20-SQ
391.00	TRANSPORTATION EQUIPMENT	14-L4	14-L4
393.00	TOOLS, SHOP AND GARAGE EQUIPMENT	20-SQ	20-SQ

Notes and Source:

Col. A: 2023 PAWC Rate Case, Exhibit 11-I

Col. B: 2023 PAWC Rate Case, Exhibit 11-J

Pa. P.U.C. v. Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 (Water)
R-2023-3043190 (Wastewater)
Interrogatories of the Office of Consumer Advocate to PAWC
Set 26

31. Please refer to the table below:

Account No.	Description	2023 Rate Case		
		June 30, 2023 (A)	June 30, 2024 (B)	June 30, 2025 (C)
304.20	POWER AND PUMING STRUCTURES LARGE STRUCTURES	75-S0.5	75-R2	75-R2
304.30	PURIFICATION BUILDINGS LARGE STRUCTURES	55-S1	70-S0.5	70-S0.5
304.36	WASTE HANDLING AND TREATMENT STRUCTURES	55-S1	60-S2.5	60-S2.5
304.61	OFFICE BUILDINGS LARGE STRUCTURES	55-S0	55-R1.5	55-R1.5
305.00	COLLECTING AND IMPOUNDING RESERVOIRS LARGE RESERVOIRS	130-R2	125-R2	125-R2
306.00	LAKE, RIVER AND OTHER INTAKES LARGE RESERVOIRS	55-S1.5	55-S1	55-S1
320.10	PURIFICATION SYSTEM LARGE STRUCTURES LARGE STRUCTURES	50-S1	60-S0.5	60-S0.5

Notes and Source:

Col. A: 2023 PAWC Rate Case, Exhibit 11-A
Col. B: 2023 PAWC Rate Case, Exhibit 11-B
Col. C: 2023 PAWC Rate Case, Exhibit 11-C

- a) Please explain fully and in detail why the survivor curve changed from 2023 to 2024 and 2025 for each of the accounts in the table above.
- b) Please explain fully and in detail why the useful lives changed from 2023 to 2024 and 2025 for each of the accounts in the table above.

Pa. P.U.C. v. Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 (Water)
R-2023-3043190 (Wastewater)
Interrogatories of the Office of Consumer Advocate to PAWC
Set 26

32. Please refer to the table below and explain fully and in detail why the useful lives changed for each of the following accounts:

Account No.	Description	2022 Rate Case December 31, 2023 (A)	2023 Rate Case June 30, 2023 (B)
304.15	OTHER WATER SOURCE STRUCTURES	60-R1.5	50-S0.5
304.30	PURIFICATION BUILDINGS LARGE STRUCTURES	70-S0.5	55-S1
304.36	WASTE HANDLING AND TREATMENT STRUCTURES	60-S2.5	55-S1
305.00	COLLECTING AND IMPOUNDING RESERVOIRS LARGE RESERVOIRS	125-R2	130-R2
320.10	PURIFICATION SYSTEM LARGE STRUCTURES LARGE STRUCTURES	60-S0.5	50-S1
320.20	CHEMICAL TREATMENT	36-R0.5	42-R0.5
331.00	MAINS AND ACCESSORIES	110-R2	90-R2
333.00	SERVICES	70-R2.5	65-R2.5
335.00	FIRE HYDRANTS	75-R2.5	60-R2

Notes and Source:

Col. A: 2022 PAWC Rate Case, Exhibit 11-C

Col. B: 2023 PAWC Rate Case, Exhibit 11-A

ATTACHMENT B

**Pennsylvania-American Water Company
Docket Nos. R-2023-3043189 (Water)
R-2023-3043190 (Wastewater)
Office of Consumer Advocate Set 8**

OCA 08-021

Responsible Witness: Deb Degillio, VP, Customer Service

Question:

Does PAWC include non-basic service charges on its residential customer bills? If so, provide a sample bill that identifies each such non-basic service are presented and disclosed as non-basic on the customer bills.

Response:

Yes. For the convenience of its customers and at their election, PAWC provides on-bill billing for utility related insurance products provided by Oncourse Home Solutions ("Oncourse"). PAWC includes non-basic service charges for Oncourse on residential customer bills. Please see OCA 08-021_Attachment, page 3, for a sample and explanation of the charges.



WE KEEP LIFE FLOWING™

Service Address:



CANONSBURG, PA 15317-2514

THANK YOU FOR BEING OUR CUSTOMER

Important Account Messages

- Want to get to know us better? Visit www.pennsylvaniaamwater.com to learn more about the services we provide.
- Thank you for being a long time customer! We work hard every day to deliver water service that is safe, reliable, and affordable – our customers deserve nothing less.

For more information, visit www.pennsylvaniaamwater.com

Statement

Account No. [REDACTED]

Total Amount Due:	\$135.69
Payment Due By:	September 8, 2023

Thank you for using AutoPay. Payment will be automatically deducted on the bill due date.

Billing Date: August 17, 2023
Service Period: Jul 19 to Aug 16 (29 Days)
Total Gallons: 5,600

Account Summary – See page 3 for Account Detail

Prior Billing:		\$169.52
Payments - Thank You!	-	\$169.52
Balance Forward:	=	\$0.00
Service Related Charges:	+	\$107.70
Protection Programs:	+	\$27.99
Total Amount Due:	=	\$135.69

View your account information or pay your bill anytime at: www.amwater.com/MyAccount

Pay by Phone*: Pay anytime at 1-855-748-6066

Customer Service: 1-800-565-7292
M-F 7:00am to 7:00pm – Emergencies 24/7

PENNSYLVANIA AMERICAN WATER
PO BOX 371412
PITTSBURGH, PA. 15250-7412

▼ Please return bottom portion with your payment. DO NOT send cash. Retain upper portion for your records. ▼

Account No. [REDACTED]

Total Amount Due:	\$135.69
Payment Due By:	September 8, 2023

If paying after 9/8/23, pay this amount: \$137.31



P.O. BOX 91623
RANTOUL, IL 61866-8623

Service to: [REDACTED]
CANONSBURG, PA 15317-2514

Amount Enclosed \$ **Paid Electronically on Due Date**

[REDACTED]
PITTSBURGH, PA 15219

PENNSYLVANIA AMERICAN WATER
PO BOX 371412
PITTSBURGH, PA. 15250-7412

Messages from Pennsylvania American Water

- Effective July 1, 2023, the Water Distribution System Improvement Charge decreased from 0.02% to 0.00%. This charge funds the replacement of water distribution system facilities.
- *****IMPORTANT WATER QUALITY MESSAGE:** Your annual Water Quality Report can be viewed electronically at www.amwater.com/ccr/greaterpgh.pdf. If you prefer a paper copy to be sent to you, please contact our Customer Service Center at 800-565-7292.
- Approximately 3.64 percent, or \$4.94 of state taxes are included in your current bill.



CUSTOMER SERVICE: 1-800-565-7292
 HOURS: M-F, 7am-7pm ▪ Emergencies: 24/7
TTY/TDD FOR THE HEARING IMPAIRED: 711
 (and then reference Customer Service number listed above)

SERVICES

- Go Paperless:** Save time. Save money. Sign up for **Paperless Billing** and **Auto Pay** on MyWater at amwater.com/mywater. Not registered? Log in and be sure to have your account number handy.
- Water Quality:** We take water quality seriously. When it comes to complying with federal drinking water standards, we consistently score better than the industry average. For a copy of the annual water quality report for your area, visit pennsylvaniaamwater.com. Under Water Quality, select Water Quality Reports.
- H2O Help To Others:** This program helps low-income customers who qualify with their water bills. For more information, contact our program administrator, the Dollar Energy Fund, at 1-888-282-6816.

EXPLANATION OF FEES AND OTHER TERMS

- Distribution System Improvement Charge (DSIC):** A charge to replace aging facilities, such as mains, meters, fire hydrants, valves, etc. This charge, as approved by the Pennsylvania Public Utility Commission (PUC), will change every three months based on work completed. It will not exceed 7.5% of your bill.
- Payment by Check:** Paying by check authorizes American Water to send the information from your check electronically to your bank for payment. The transaction will appear on your bank statement. The physical check will not be presented to your financial institution or returned to you.

- State Tax Surcharges:** This PUC-approved charge allows the company to recover costs specific to state taxes.
- Estimated Bill:** This occurs when we are unable to read the water meter. Your usage from the same billing period the prior year is used to calculate the estimated bill. The next actual meter reading corrects any over or under estimates.
- Inquiries/Disputes:** For inquiries about your bill, please register any question or complaint about the bill prior to the due date. Contact customer service Monday–Friday from 7 a.m. to 7 p.m. by calling 1-800-565-7292. To register your complaint by mail, send written correspondence to PO Box 2798, Camden, NJ 08101.
- Rates:** A detailed listing of charges that make up your bill is available upon request by contacting Customer Service or visiting us online at pennsylvaniaamwater.com. Under Customer Service & Billing, select Your Water and Wastewater Rates.
- Protection programs for water, sewer and in-home plumbing** are offered by American Water Resources. Charges for these services are not regulated by the Pennsylvania Public Utility Commission. Regulated services will not be disconnected as a result of non-payment of protection program charges. Customers with protection program charges will not be assessed a late payment charge for late or unpaid protection plan charges. For inquiries about protection programs, please contact American Water Resources at 1-888-378-4458.
- Correspondence:** Please send written correspondence to PO Box 2798, Camden, NJ 08101. Be sure to include your name, account number, service address, mailing address and phone number including area code. Please do not send correspondence with your payment, as it may delay processing your payment and correspondence.

H2O HELP TO OTHERS PROGRAM - lend a hand to customers in need

I'm adding a one time contribution of \$_____ with my payment.

I'd like to add a recurring contribution to each bill of \$_____. I understand this amount will be added to each bill.

Address Change(s)

Name _____

Address _____

City _____

State _____ Zip Code _____

(_____) _____ Mobile Number

Phone Number _____

E-mail Address _____

Other ways to pay your bill

Auto Pay	Online	In Person
Save time and money. Enroll in Auto Pay, and your bill will be paid on time, every time, directly from your bank account on the due date. No stamps required!	With My Account, you can pay your bill anytime, anywhere. Registration is fast and easy. Visit www.amwater.com/MyAccount or pay without registration at www.amwater.com/billpay (fee may apply).	We have agreements with several authorized payment locations in our service areas. Visit our website to find one near you.

Meter Reading and Usage Summary

Meter No.	Measure	Size	From Date	To Date	Previous Read	Current Read	Meter Units	Billing Units	Total Gallons
N083592445	100 gal	5/8"	07/19/2023	08/16/2023	12,280 (A)	12,336 (A)	56	56.00	5,600

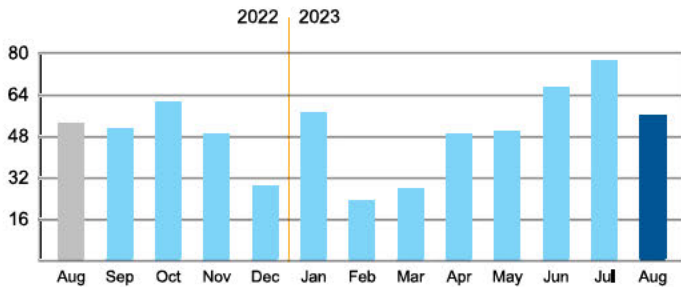
A = Actual E = Estimate

1 Billing Unit = 100 gallons

Total Gallons: 5,600

Billed Usage History (graph shown in 100 gallons)

- 5,600 gallons = usage for this period
- 5,300 gallons = usage for same period last year



Next Scheduled Read Date: on or about September 19, 2023
Account Type: Residential

Average
daily use for
this period is:
(29 days)



Year to Date Billed Usage: 40,700 gallons

Account Detail

Account No. [REDACTED]
Service To: [REDACTED] CANONSBURG, PA 15317-2514

Prior Billing	169.52
Payments	-169.52
Total payments as of Aug 11. Thank you!	
Balance Forward	0.00
Service Related Charges - 07/19/23 to 08/16/23	
Water Service	107.70
Water Service Charge	17.50
Water Usage Charge (56 x \$1,6108)	90.20
Total Service Related Charges	107.70
Protection Programs:	27.99
For inquiries, please call 1-888-378-4458	
1 Protection Program	27.99
Total Current Period Charges	135.69

Total Amount Due



\$135.69

Understanding Your Bill

The information below defines some of the new terms you may find on your bill:

- **Service Related Charges:** This section includes charges for services related to water, wastewater and fire protection. If applicable, credits and debits for correction to previously billed charges are itemized in this section.
- **Fees and Adjustments:** This section provides details related to additional charges or adjustments for the service period referenced. Fees, when applicable, would include items such as service activation and late payment charges.
- **Billing Units:** One billing unit equals 100 gallons of water used. If the meter serving your property measures your water use in cubic feet or a different unit of measure, we convert the usage to gallons to make it easier to understand.
- **Average Daily Use:** The gallons shown in the water droplet above represent your average daily water use for the current billing period. Tracking the amount of water you use can help you manage your overall water use from month to month.
- **Protection programs for water, sewer and in-home plumbing** are offered by American Water Resources. Charges for these services are not regulated by the Pennsylvania Public Utility Commission. Regulated services will not be disconnected as a result of non-payment of protection program charges. Customers with protection program charges will not be assessed a late payment charge for late or unpaid protection plan charges. For inquiries about protection programs, please contact American Water Resources at 888-378-4458.
- **Still have questions?** We are here to help. Our customer service representatives are available M-F, 7 a.m. to 7 p.m. More information on understanding your bill and charges can also be found on our website. See the link below.

Para obtener asistencia de traducción en la lectura de su factura, comuníquese con nuestro Centro de Atención al Cliente al 1-800-565-7292 de lunes a viernes de 7 a. m. a 7 p. m.

PA.61.22

For more information about your charges and rates, please visit:
<https://amwater.com/paaw/rates>

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LESS PAPER. MORE TREES.

We'll plant one tree for every customer who converts to paperless billing during the month of August for National Water Quality Month!

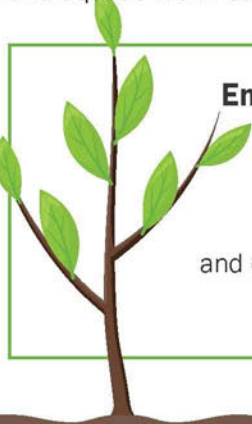
Last year, Pennsylvania American Water launched a campaign to reduce paper usage and plant trees across the Commonwealth. Because of the program's success, we're doing it again this year.



We're pledging to donate \$12 to the Chesapeake Bay Foundation's Keystone 10 Million Trees Partnership for every customer (up to 2,000) who switches from paper to electronic bills this month.

Each contribution underwrites the full cost of planting one tree, including a reusable stake and shelter.

This collaborative project provides sustainable benefits to watersheds across Pennsylvania: Limiting the impact on forests; reducing waste, energy and fuel use; and improving water quality and aquatic life in streams near tree plantings.



Enroll in Paperless on MyWater Today

Not registered for MyWater? Visit amwater.com/mywater and click on **Sign Up**. Have your account number handy.



Let's beat 2022's results!

1,947 customers switched to paperless billing

\$19,470 contributed to the Chesapeake Bay Foundation by Pennsylvania American Water

1,947 new trees planted across the Commonwealth



Pennsylvania American Water received the 2023 Governor's Award for Environmental Excellence for its 2022 paperless billing/tree planting campaign.

Request trees for your property

Take your environmental commitment a step further and request free trees to plant on your property! Trees can help clean your local water, improve your living conditions, create natural shade and privacy, and increase your property value. Visit: <https://tenmilliontrees.org/get-involved/landowners>. Be sure to note that you are a Pennsylvania American Water customer on the online request form at <https://tenmilliontrees.org/contact/landowners>.



TWO WAYS TO SIMPLIFY AND GO PAPERLESS



MORE CONVENIENCE. LESS CLUTTER. SECURE.



Receive your bill electronically with **PAPERLESS BILLING**

We'll send you an email with the amount due, the due date and a link to view your bill online (along with any materials that would have been included with your paper bill). We'll also email service-related communications to you.

It's simple, secure and clutter-free!

Enroll in **Paperless Billing** and **Auto Pay** on MyWater at amwater.com/mywater.

Pay your bill electronically with **AUTO PAY**



Take it one step further and go entirely paperless. Enroll in **Auto Pay**, and your bill will be paid on time, every time, automatically on the due date.

NEW

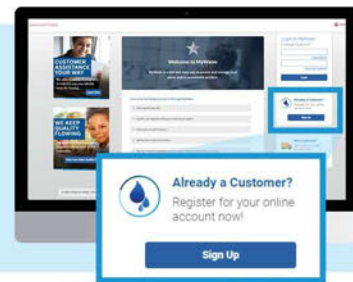
Customers can now enroll in Auto Pay using their credit card!

Now, you can choose to have your monthly bill automatically applied to your credit card or deducted directly from your checking or savings account. **No stamps required!**



NOT ENROLLED IN MYWATER?

Visit amwater.com/mywater and click on **Sign Up**. Have your account number handy.



NOTICE OF PROPOSED WASTEWATER ACQUISITION AND RATE BASE ADDITION

(Docket No. A-2021-3024058)



PENNSYLVANIA
AMERICAN WATER

Dear Customer:

On July 20, 2023, the Pennsylvania Public Utility Commission (“PUC”) conditionally accepted for filing the application of Pennsylvania-American Water Co. (“Pennsylvania-American”) for approval to acquire the Borough of Brentwood (“Brentwood”) wastewater system assets. Brentwood serves approximately 3,980 customers in Allegheny County. Pennsylvania-American’s application also requests that the PUC authorize an addition of \$19,364,443 to Pennsylvania-American’s rate base pursuant to 66 Pa. C.S. § 1329. A utility’s rate base is the value of property used by the utility to provide service to its customers and is one of many components used to establish customer rates.

This acquisition will not immediately, but may in the future, affect water and/or wastewater bills of Pennsylvania-American customers, including Brentwood wastewater customers. Pennsylvania-American is not requesting a rate increase as part of the acquisition. Your current rates will not change as a result of this acquisition until the conclusion of Pennsylvania-American’s first base rate case where Pennsylvania-American requests and receives PUC approval to increase its rates. Based on a non-binding estimate of the potential rate impacts, Pennsylvania-American anticipates that the potential rate impact could be as follows:

PAWC WASTEWATER				
Rate Class	Average Usage	Average Monthly Bill at PAWC Zone 1 Current Rates	Average Monthly Bill at PAWC Zone 1 Rate Adjusted for Potential Impact of Acquisition	Potential Increase
Residential	3,212 gal/month	\$106.65	\$106.97	\$0.32 or 0.3%
Commercial	22,561 gal/month	\$509.46	\$510.99	\$1.53 or 0.3%
Industrial	528,207 gal/month	\$11,143.19	\$11,176.62	\$33.43 or 0.3%

PAWC WATER				
Rate Class	Average Usage	Average Monthly Bill at PAWC Zone 1 Current Rates	Average Monthly Bill at PAWC Zone 1 2023 Rate Adjusted for Potential Impact of Acquisition	Potential Increase
Residential	3,212 gal/month	\$69.24	\$69.24	\$0.00 or 0.0%
Commercial	22,561 gal/month	\$371.82	\$371.82	\$0.00 or 0.0%
Industrial	528,207 gal/month	\$5,985.09	\$5,985.08	\$0.00 or 0.0%

These amounts could change and will depend on how the PUC chooses to apportion any increase among different types of utility service, rate zones and classes of customers. For Pennsylvania-American customers in a rate zone other than Rate Zone 1, the potential rate impact could vary from the chart above.

PUC ROLE

The state agency that approves acquisitions and rates for regulated public utilities is the PUC. The PUC will review and investigate the proposed acquisition. After examining the evidence, the PUC may approve, modify or deny the acquisition and may approve, modify or deny the requested addition to rate base.

ACTIONS YOU CAN TAKE

You can support or challenge Pennsylvania-American’s request by:

- 1. Sending a letter to the PUC.** You can tell the PUC why you support or object to the application in your letter. This information can be helpful when the PUC investigates the application. Send your letter to the Pennsylvania Public Utility Commission, Post Office Box 3265, Harrisburg, PA 17105-3265.
- 2. Attending or presenting testimony at a PUC public input hearing.** You can attend or be a witness at a PUC public input hearing. The PUC holds public input hearings if it opens an investigation of Pennsylvania-American’s transaction and if there is enough interest in the case. At these hearings, you can present your views in person to the PUC judge and to company

representatives. Testimony under oath becomes part of the application case record. The PUC holds these hearings in the service area of the company. For more information, call the PUC at 1-800-692-7380.

- 3. Filing a protest or a petition to intervene.** If you want to be a party to the case, you must file a protest or a petition to intervene. You then have an opportunity to take part in all the hearings about the proposed acquisition. You can receive copies of all materials distributed by the other parties. Protests and petitions to intervene must be filed in accordance with 52 Pa. Code (relating to public utilities) on or before October 16, 2023. Filings must be made with the Secretary of the Pennsylvania Public Utility Commission at P.O. Box 3265, Harrisburg, PA 17105-3265, with a copy served on Pennsylvania-American’s counsel at:

David P. Zambito, Esq.
Cozen O’Connor
17 North Second Street, Suite 1410
Harrisburg, PA 17101

The documents filed in support of the application are available on the PUC’s website at www.puc.pa.gov, and for inspection and copying at the Office of the Secretary of the PUC between 8 a.m. and 4:30 p.m., Monday through Friday, and at Pennsylvania-American’s offices at 852 Wesley Drive, Mechanicsburg, PA 17055. The PUC docket number is A-2021-3024058. For more information, you may contact the PUC’s Bureau of Consumer Services at 1-800-692-7380.

Bill Inserts and Important Notices

We encourage you to click the link(s) below to view any bill inserts and other important notices you would have received with your printed bill.

<https://amwater.com/files/OAPASB.pdf>

<https://amwater.com/files/OAPA84.pdf>

<https://amwater.com/files/OAPA83.pdf>

ATTACHMENT C (CONFIDENTIAL)