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File #: 203073

January 25, 2024

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2nd Floor  
P.O. Box 3265  
Harrisburg, PA 17105-3265

**Re: Petition of Aqua Pennsylvania, Inc. For Approval of its Lead Service Line  
Replacement Program  
Docket No. P-2023-3044459**

Dear Secretary Chiavetta:

Attached for filing please find the Responses of Aqua Pennsylvania, Inc. to the Set I Data Requests of the Bureau of Technical Utility Services in the above-referenced proceeding. Copies will be provided as indicated on the Certificate of Service.

Due to the size of the electronic spreadsheet included as P-1 Attachment 1, the attachment will be uploaded to the Commission's SharePoint filing system.

Respectfully submitted,



Megan E. Rulli

MER/kl  
Attachment

Rosemary Chiavetta, Secretary  
January 25, 2024  
Page 2

cc: Matthew Lamb – TUS (*via email; w/attachment*)  
Certificate of Service

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).


**VIA E-MAIL**

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Date: January 25, 2024

  
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Megan E. Rulli

**PETITION OF AQUA PENNSYLVANIA, INC.**

**DOCKET NO. P-2023-3044459**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**SET I DATA REQUESTS**

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**P-1** Attachment A of Aqua’s Petition for Approval of its Third Long-Term Infrastructure Improvement Plan (LTIP)<sup>1</sup> for 2023-2027 included a copy of Aqua’s Lead Service Line Replacement Plan (LSLR Plan). The LSLR Plan’s Section II.A. indicated that Aqua’s Service Line Inventory is continuing to be developed at this time with 90% of company-owned service line material and 73% of customer-owned service line material identified. Please provide responses to the following:

- a. Provide a current copy of Aqua’s Service Line Inventory in a live electronic spreadsheet format pursuant to 52 Pa. Code § 65.56(a)(1); and
- b. Quantify the projected annual expenditure to complete the Service Line Inventory.

**RESPONSE**

- a. Please see the electronic spreadsheet P-1 Attachment 1.
- b. The Company’s projected annual expenditure to observe and verify unknown service line materials which include customer surveys and potholing are below:

	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033
Service Line Inventory (Company & Customer Material)	\$1,953,977	\$3,031,767	\$3,122,720	\$3,216,402	\$3,312,894	\$3,412,281	\$3,514,649	\$3,620,089	\$3,728,691	\$3,840,552

The above figures do not represent the costs that may be incurred to meet Pennsylvania Department of Environmental Protection (“DEP”) expectations that are not a finalized regulation. The DEP expectations require additional verification where stand-alone records or visual verification within the structure

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<sup>1</sup> See *Petition of Aqua Pennsylvania, Inc. for Approval of its Third Long-Term Infrastructure Improvement Plan* at Docket No. P-2023-3043755.

exist showing non-lead. Additional verification would include requiring excavation or potholing to observe the customer side service line material at two locations and the Company side service line material at one location to verify material type, even when a record exists of service line material. These costs are subject to change depending on the final U.S. Environmental Protection Agency (“EPA”) Lead and Copper Rule Improvements (“LCRI”) requirements and DEP’s requirements for verification of service line material for the service line inventory.

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- P-2** In Section II.A.1 of the LSLR Plan, Aqua indicated that its tariff, from 1956 to current, required the installation of Type K copper on both the company and customer side of the service line for 49 municipalities within the Hatboro and Main Systems and therefore Aqua would assume homes built during 1956 or later for these water systems would be assigned a “non-lead” designation. Please provide responses to the following:
- a. Indicate whether Aqua will implement a field verification process based on a mathematical model to ensure the veracity of the aforementioned assumption to a defined confidence level and, if so, provide a detailed explanation of the field verification process; and
  - b. Confirm that Aqua intends to complete a full inventory of the service line material of both the company and customer sides for homes built prior to 1956 within the Hatboro and Main Systems.

**RESPONSE**

- a. Aqua will implement a field verification process in compliance with LCRI which as proposed currently requires a mathematical model to ensure the veracity of the assumption to confidence level in the final regulations. The proposed regulations are summarized at 40 CFR 141.84(b)(5). Aqua will visually observe the service line materials on both the utility and customer sides by using a combination of methods including potholing and basement inspections.
- b. Aqua will complete the inventory and any verification based on LCRI requirements. Aqua has updated its LSLR Plan in P-4 Attachment 1 to remove Hatboro from the assumption.

**PETITION OF AQUA PENNSYLVANIA, INC.**

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- P-3** In Section II.B.2. of the LSLR Plan, Aqua is projecting a replacement schedule during the term of the LTIP of customer-owned LSLs as follows: 500 in 2023, 1,200 in 2024 and 1,500 thereafter in 2025, 2026 and 2027, respectively, for a total of 6,200  $[500 + 1,200 + (3 \times 1,500) = 6,200]$ . Additionally, Aqua indicated it believes approximately 2% or approximately 2,340 of the unknown customer side service lines are potentially lead or galvanized requiring replacement (GRR) that will need to be replaced. Considering this projection and assumption, please provide responses to the following:
- a. Explain the apparent discrepancy between the total number of customer-owned LSLs that are projected to be replaced during the term of the LTIP with the significantly lower number of customer-owned LSLs that Aqua believes will need to be replaced based on the service line inventory; and
  - b. Submit a revised LSLR Plan and/or LTIP to reflect the number of customer-owned LSLs Aqua projects will need to be replaced based on its service line inventory and, correspondingly, indicate the planned programmatic replacement schedule in the LTIP term of 2023 through 2027 by year. Please note that the total number of planned customer-owned LSLs projected to be replaced in the LTIP should be equal to or less than the total number of customer-owned LSLs projected to be identified in the completed service line inventory.

**RESPONSE**

- a. On page 5 of the LSLR Plan, Table 1 shows total material type identification across Aqua's service territory. The customer-side material types that have to be replaced, *i.e.*, lines that are potentially lead or GRR, are 389 lead, 10,380 GRR, and approximately 2,340 unknowns that could be lead or galvanized (approximately 2% of 117,015 unknowns). Together, the total number of customer-side lines to be replaced is 13,109. The total number of customer-owned LSLs that are projected to be replaced over the course of the LTIP is 6,200, which is less than the total number of 13,109 customer-owned service

lines Aqua believes will need to be replaced based on current service line inventory. These figures have been updated in P-4 Attachment 1 based on updated service line inventory information.

- b. Please see the response to part a, above.

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**P-4**

In Section II.B.4. of the LSLR Plan, Aqua indicated that when it uncovers a company-owned LSL while completing emergency repairs to its system, Aqua will replace its service line up to the curb stop, which will reveal the customer-side material. The LSLR Plan indicated that if the customer-owned portion of the service line is lead, then Aqua will contact the customer/owner and provide them with information and materials. This provision appears to allow for partial LSLRs depending on the success of contacting the customer and obtaining permission to concurrently replace the customer-owned LSL. Additionally, pursuant to 52 Pa. Code § 65.62, the Commission notes that any repair of a known or discovered LSL would be considered a partial LSLR and is strictly prohibited.

Correspondingly, the Commission also notes that a water main replacement or repair, regardless of whether the main replacement activities were planned or an emergency, that reveals a LSL would require a complete LSLR prior to the service line being placed back into service as the reconnection of a LSL to a new main segment or a new Company-owned service line would be considered a partial LSLR. Please provide responses to the following:

- a. Clarify whether Aqua will maintain the proper equipment and tools necessary for its staff, or if it intends to maintain third party contracts, to complete emergency LSLRs; and
- b. Submit a revised LSLR Plan that includes Aqua's processes and procedures to address emergency repairs or replacements which reveal LSLs that eliminates any partial LSLRs and that fully describes Aqua's procedures to fulfill its duty to communicate to customers and/or property owners that failure to allow Aqua to complete the LSLR or to replace the customer-owned LSL concurrent with Aqua replacing the main or company-owned service line will lead to termination of water service.

**RESPONSE**

- a. Aqua will maintain proper staff necessary to coordinate with the third party vendors Aqua uses to complete emergency LSLRs.

- b. Aqua will not be completing partial replacements. The provision described in the question indicates that Aqua will install the Company side service line up to the curb stop. However, no connection will be made, so no partial replacement will occur. The connection will not be made until the customer side LSL is replaced. Please see P-4 Attachment 1, which includes an updated version clarifying this section of the LSLR Plan in Section II.B.4. Attachment 1 also includes revisions to the LSLR Plan in response to P-2, P-3, P-5, P-6 and P-8. In addition, the revised LSLR Plan includes a revision to Section II.B.6 to remove sampling not required by regulation.

Comments to the LSLR Plan were submitted by the Office of Consumer Advocate (“OCA”) and The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”).

The Company agrees it will translate the communications and education materials into Spanish and include a statement in Spanish to contact Aqua for information and translation assistance. The Company will develop these materials and provide them to the parties.

The Company has also made updates to its plan to address occupants/residents of a premise that are neither the customer nor the property owner to provide them with the same information as if they were the customer along with the provisions regarding Step-In Rights.

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- P-5** In Section II.B.7. of the LSLR Plan, Aqua indicated that in most replacements of customer-owned LSLs, it does not excavate and remove the existing LSL, and instead abandons it in place when the new service line is installed. 52 Pa. Code § 65.62(7) requires that the LSLR Plan include lead/material recycling and disposal efforts, including a description of what the entity will do with proceeds from recycling and disposal efforts. Please provide a revised LSLR Plan which complies with the requirements of 52 Pa. Code § 65.62(7).

**RESPONSE**

When a customer LSL is discovered, Aqua's vendors make an attempt to pull the entire length of the line, which reduces excavation and restoration costs. However, often the line cannot be pulled through and is abandoned in place. Aqua's third party vendors who complete the replacements will dispose of any customer side lead material removed at recycling centers. No proceeds are provided to Aqua of the recycled material removed by the vendors.

For Company side LSL replacements, Aqua attempts to pull the entire length of the line which reduces excavation and restoration costs. However, often the line cannot be pulled through and is abandoned in place. Any lead material removed during a Company side LSL replacement will be brought back to the division office and put in our recycling containers to be taken to the recycling center. The scrap metal that is recycled is booked into a removal and salvage account and amortized over 5 years. Please see the response to P-4 Attachment 1, the revised LSLR Plan, which has been updated to include the Company's lead material recycling and disposal efforts, with a description of how the Company will handle proceeds from recycling and disposal efforts, in Section II.B.7.

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- P-6** In Section II.B.10 of the LSLR Plan, Aqua indicated that if a customer refuses replacement of a customer-owned LSL or is non-responsive to the customer outreach described in Section II.B.5 of the LSLR Plan, Aqua will initiate its termination procedures. Aqua also indicated that it will provide the customer with a Customer Refusal Letter (Exhibit Q), its lead fact sheet describing the health hazards of lead service lines (Exhibit H), and the lead service line program information sheet (Exhibit I). Please provide a revised LSLR Plan that clarifies how these materials will be provided to the customer and if these materials will be provided before or after Aqua initiates its termination procedures.

**RESPONSE**

The Customer Refusal Letter, the Lead Fact Sheet, and the Lead Service Line Program Information Sheet will be provided at the same time as the shutoff notice – either hand delivered to the customer or posted at the customer’s premises. Please see response to P-4, Attachment 1, for updates to Aqua’s LSLR Plan.

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- P-7** Exhibit A of Aqua’s Petition for a Lead Service Line Replacement Program (LSLR Program) included a copy of Aqua’s pro forma tariff supplement (Tariff Supplement). The Tariff Supplement does not appear to include certain information pursuant to 52 Pa. Code § 65.58. Please provide a revised Tariff Supplement that includes and addresses the following and that is consistent with the requirements of 52 Pa. Code § 65.58:
- a. A definition of customer-owned lead service line;
  - b. A description of how Aqua will perfect its ownership of the portion of the service line located within the then-existing right-of-way in conformance with its Commission-approved tariff to ensure that Aqua can obtain necessary permits during the planning phase of a LSLR project, if necessary;
  - c. The defined length of pipe within a structure after which Aqua may install a shutoff valve pursuant to 52 Pa. Code § 65.58(b), in linear inches or feet;
  - d. The defined length of time by which Aqua will issue a reimbursement for an eligible reimbursement request, in days;
  - e. That a verified statement from a contractor attesting to the completion of a LSLR may be a sufficient form of LSLR verification;
  - f. That if reimbursement would cause the Aqua to exceed its current annual cap, the entity must increase its current annual cap by the amount of the reimbursement and decrease its next annual cap by this amount; and
  - g. The defined maximum coverage amounts under the LSLR warranty, such as a coverage amount in dollars or a provision indicating that the coverage amount is unlimited.

**RESPONSE**

Please see P-7 Attachment 1.

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**P-8**

In Section 22 of Aqua’s LSLR Program, Aqua indicated that when evidence-based data is not available, Aqua will assign material designations of “non-lead” based on its knowledge of when the use of lead was discontinued or banned in new construction for certain geographic areas. Additionally, in Section II.A of Aqua’s LSLR Plan, Aqua indicated that it intends to assume that all homes that were built during or after 1991 have non-lead service lines. Please provide responses to the following:

- a. Confirm that Aqua will inventory the service lines of all homes built before 1991 for potential LSLs;
- b. Explain why it is reasonable for Aqua to assume that all homes built during or after 1991 contained only “non-lead” service line materials realizing the ban occurred in early 1991 and the prohibition may not have been equally enforced in different geographic locations across Pennsylvania based on available lead materials held on hand in inventory prior to 1991 with suppliers and builders;
- c. Explain how Aqua will modify the assumptions of its service line inventory and implement a field verification process if LSLs are discovered in a home built during or after 1991 (e.g., complete a service line inventory for homes built in the same year for a defined geographic area surrounding the home with the LSL.); and
- d. Provide a revised LSLR Plan that confirms Aqua will complete a service line inventory of all homes built before 1991 and details how Aqua will address expanding its service line inventory when a LSL is discovered in homes built during or after 1991.

**RESPONSE**

- a. Except for the 49 municipalities within the Main System covered by Aqua’s tariff requiring Type K copper on both the Company and customer side of the

service line starting in 1956, Aqua will complete investigative work to verify service line materials of all homes built before 1991 for potential LSLs where observations, tap cards, drawings, etc. are not already available.

- b. For system that are outside the Main System, and no records indicating the customer or Company service line materials, Aqua believes it is reasonable to assume that all homes built during or after 1991 contained only “non-lead” service line materials because the ban became effective in early January 1991. However, to identify any area outliers, Aqua will implement a field verification process in compliance with LCRI which as proposed currently requires a mathematical model to ensure the veracity of the assumption to confidence level in the final regulations. The proposed regulations are summarized at 40 CFR 141.84(b)(5). Aqua will visually observe the service line materials on both the utility and customer sides by using a combination of methods including potholing and basement inspections.
- c. Aqua plans to complete the validation requirements once they are finalized in LCRI. Aqua also plans to follow DEP’s Service Line Inventory (“SLI”) Question & Answer Document<sup>1</sup> updated 10/25/2023 (see pages 8-9) to reach required confidence levels. For geographic locations that fail to meet validation criteria (achieving an accuracy of at least 95%), Aqua will field verify service line materials for all service lines in that geographic location that do not have observation data.
- d. Please see P-4 Attachment 1 for updates to the LSLR Plan in Section II.A.

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<sup>1</sup>[https://files.dep.state.pa.us/Water/BSDW/DrinkingWaterManagement/Regulations/SLI\\_Q\\_and\\_A\\_Document\\_for\\_External\\_Web.pdf](https://files.dep.state.pa.us/Water/BSDW/DrinkingWaterManagement/Regulations/SLI_Q_and_A_Document_for_External_Web.pdf)

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**P-9** Paragraph 44 of Aqua’s LSLR Program and Section 20.2 of the Tariff Supplement indicated that Aqua is proposing to use “Step In Rights” in limited circumstances to avoid termination of service to a customer when the property owner is unknown or has not responded to multiple attempts to contact and offer replacement of the customer-owned LSL under the program. Please explain the legal standard under which Aqua would be permitted to complete a LSLR under the undefined “Step In Rights.”

**RESPONSE**

To the extent that this question asks the Company to provide a legal conclusion, or its legal research or legal theories, Aqua objects to the same. Notwithstanding this objection, and without waiver of the same, Aqua provides the following answer.

The term “Step In Rights” in the context of replacement of customer-owned LSL was established by the Commission in two orders. In *Implementation of Chapter 32 of the Public Utility Code Regarding Pittsburgh Water and Sewer Authority Stage I*, Docket Nos. M-2018-2640802, et. al., Order entered February 4, 2021, the Commission directed as follows:

[I]f a landlord declines to permit the PWSA to replace the private-side LSL, it will likely create a condition of the customer service line such that there is a risk to the public health or safety of the tenants becoming subject to service termination for reasons not within their control. As such, we request the Authority to develop and submit appropriate Tariff language that would provide the PWSA with **step-in rights** to make the necessary replacement of the private LSL where a landlord is nonresponsive to the pre-termination notice procedures. Such **step-in rights** would be intended to avoid service termination to the PWSA’s tenant-customers due to circumstances beyond the tenants’ control – that is, due to the landlord standing in the way of the tenants receiving

safe service. Because the exercise of such **step-in rights** may result in the landlord filing a complaint against the PWSA, the Tariff should be clear on the PWSA's limitation of liability with respect to property restorations when performing a private-side LSL.

Order at pp. 31-32 (Emphasis supplied).

Subsequently, in its Final Rulemaking Order in the *Rulemaking to Implement Act 120 of 2018 at 52. Pa. Code Chapters 65 and 66*, Order enter March 14, 2022, the Commission again addressed the issue of replacements of customer-owned LSLs in the situation where the property owner is not the customer and is not responsive to a utility's offer to replace the LSL. In its Final Rulemaking Order, the Commission stated:

We recognize that entities may wish to proceed with replacements necessary to avoid a partial LSLR resulting in termination in situations where the property owner is not the customer and is nonresponsive to the entity's offer to replace a customer-owned LSL. Thus, we will revise Section 65.58(c) by adding a provision regarding an entity's process to address such situations. This provision will allow an entity to propose in its tariff language specifying the entity's process to address replacement of a customer-owned LSL to avoid termination of service when a property owner who is not the customer is nonresponsive to the entity's offer to replace the LSL. For instance, an entity should specify whether it will exercise **step-in rights** to make necessary replacements of a customer-owned LSL to avoid termination of service when a property owner who is not the customer is nonresponsive to an entity's offer to replace a customer-owned LSL. This provision will be Section 65.58(c)(3) and the proposed Section 65.58(c)(3) will be Section 65.58(c)(4).

Final Rulemaking Order at 52-53 (Emphasis supplied).

Aqua's proposed tariff provision with respect to Step-In Rights is substantively the same as the tariff language adopted by Pittsburgh Water and Sewer Authority (Tariff page 69), which was accepted by Secretarial Letter dated May 20, 2021 at Docket No. M-2018-2640802.

Step-In Rights would be used in the limited scenarios where there is an emergency customer side LSL replacement, or where a main replacement project reveals a customer LSL and the owner is not responsive to the multiple attempts seeking agreement for replacement of the customer LSL delaying the completion of the main replacement.

**PETITION OF AQUA PENNSYLVANIA, INC.**

**DOCKET NO. P-2023-3044459**

**BUREAU OF TECHNICAL UTILITY SERVICES**

**SET I DATA REQUESTS**

**P-10** In Tables 18, 19, 21 and 22 of the LTIP, Aqua indicated the following in a consolidated table for the replacement of customer-owned LSLs:

<b>Historic Replacement Schedule of Other Property</b>				
Year	No. of Customer Owned LSLs	DSIC Expenditure	Cost Per LSLR <sup>2</sup>	YoY% (+/-) <sup>3</sup>
2021	66	\$342,424	\$5,188	--
2022	200	\$1,134,417	\$5,672	+9.3%
<b>Projected Annual Expenditure</b>				
2023	500	\$1,900,000	\$3,800	-49.3%
2024	1200	\$8,152,149	\$6,793	+78.8%
2025	1500	\$11,741,638	\$7,828	+15.2%
2026	1500	\$12,093,887	\$8,063	+3.0%
2027	1500	\$12,456,704	\$8,304	+3.0%

Please explain the factors that are projected to increase the cost per LSLR from 2023 to 2024 and, correspondingly, from 2024 and 2025.

**RESPONSE**

The 500 replacements for 2023 was included in the LTIP as a cap so the Company could continue to replace customer LSLs without delaying replacements due to the current cap of 200. Actual replacements for 2023 was approximately 300 rather than the 500 replacement cap listed. The revised number provides for a cost per replacement of \$6,333 which is an 11.7% increase from 2022. The increase from 2023 to 2024 is then 7.2%. The factors that contribute to increased costs per LSLR are due to the addition of letters being sent out in compliance with regulatory requirements, the development of the LSLR Plan, and Service Line Inventory. In addition, the Company is projecting price increases in labor and materials for replacements, and increased costs if rock is encountered through excavation/replacement.

<sup>2</sup> The cost per LSLR was calculated by dividing the DSIC expenditure by the number of customer-owned LSLs.

<sup>3</sup> YoY% equals the year over year increase (+) or decrease (-) in either the historic or projected cost per LSLR expressed as a percentage.

# **P-4 Attachment 1**

# Aqua Pennsylvania, Inc.

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## Lead Service Line Replacement Plan

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## **DEFINITIONS**

Aqua or Company – Aqua Pennsylvania, Inc.

COLSL – Customer-owned lead service line

DEP – Pennsylvania Department of Environmental Protection

EPA – United States Environmental Protection Agency

GPA – Aqua’s Greater Pennsylvania Division

GRR – Galvanized service line requiring replacement

LCRR – Lead and Copper Rule Revisions amending the EPA’s Lead and Copper Rule. All community and non-transient non-community public water systems are required to comply with the LCRR starting October 16, 2024.

Lead action level - EPA's action level for lead in water delivered to users of public drinking water systems is 10 µg/L.

LSLR – Lead service line replacement

LSLR Project Commencement – Installation of the first lead service line replacement within a lead service line replacement project area.

LTIIIP – Long-Term Infrastructure Improvement Plan

PENNVEST – Pennsylvania Infrastructure Investment Authority

PUC or Commission – Pennsylvania Public Utility Commission

SEPA – Aqua’s Southeastern Division

µg/L – Micrograms per liter.

## **I. INTRODUCTION**

Aqua has developed the following Lead Service Line Replacement (“LSLR”) Plan in accordance with Chapter 65 of the Pennsylvania Public Utility Commission’s (“PUC” or the “Commission”) regulations, 52 Pa. Code §§ 65.51 et seq., and the Commission’s Final Implementation Order entered on March 14, 2022 at Docket No. L-2020-3019521. Included with the Company’s LSLR Plan is a pro-forma tariff supplement containing the proposed changes necessary to implement the LSLR Program, and information required by the Commission under 52 Pa. Code § 53.52(a). Aqua submits this LSLR Plan as part of its Long-Term Infrastructure Improvement Plan (“LTIIP”).

Aqua owns and operates water systems serving approximately 450,000 customers in 32 counties throughout Pennsylvania. Aqua’s service territories are designated as either Southeast Pennsylvania (“SEPA”), which includes a contiguous distribution system within portions of Bucks, Chester, Delaware, and Montgomery counties and separate smaller systems in portions of Berks, Bucks, Chester, and Montgomery counties, or Greater Pennsylvania (“GPA”), which includes Aqua’s service territories outside of SEPA.

The Company received prior Commission approval of its LSLR petition on July 15, 2021 at Docket No. P-2020-3021766. Under the Company’s existing plan, COLSL replacements are capped at 200 per year and at a budgeted amount of \$800,000.

## **II. LSLR PLAN REQUIREMENTS**

Aqua’s LSLR Plan contains the following elements and supporting documents as required by the Commission.

### **A. Service Line Inventory**

The Service Line Inventory is being developed consistent with the intent and guidance of the Lead and Copper Rule Revisions (“LCRR”) including use of all available sources of information to establish service line material designations for each side of ownership (i.e., Company and customer) which thus informs an overall service line material designation.

In developing the Service Line Inventory, the Company has used a combination of evidence-based data, including field observations, tap cards, and as-built drawings. Field observations which have occurred through meter replacement, and any time a field service representative is able to access the service line through excavation or at the meter location and is able to observe the service line material. The field observation also includes proactive review of service line material prior to main replacement work commencing in high-risk areas. The Company will send a letter to customers with unknown service line material requesting customers to identify their service line material.

When evidence-based data, as described above, is not available, the Company has applied the following methodology to assign material designations within the Service Line Inventory:

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1. Aqua’s tariff from 1956 to current practice requires installation of Type K Copper on both the Company and customer side of the service line for 49 municipalities within the Main system. Homes built during 1956 or later for these water systems were therefore assigned a “non-lead” designation.
2. Pennsylvania banned the use of lead in all plumbing in early January 1991, and therefore homes that were built during or after 1991 are similarly assigned a “non-lead” designation within the Service Line Inventory. To identify any area outliers, Aqua will implement a field verification process in compliance with LCRI which as proposed currently requires a mathematical model to ensure the veracity of the assumption to confidence level in the final regulations. The proposed regulations are summarized at 40 CFR 141.84(b)(5). Aqua will visually observe the service line materials on both the utility and customer sides by using a combination of methods including potholing and basement inspections.
3. For galvanized service lines which are or were downstream from LSLs and/or the Company cannot prove that they were never downstream from an LSL or lead gooseneck they are assigned a Galvanized Requiring Replacement (“GRR”) and will be considered candidates for replacement, unless the home and service line was built during or after 1991.

Aqua’s Service Line Inventory is continuing to be developed at this time, including the incorporation of all remaining tap cards, assumptions as described above, and other evidence-based data, with 90% of Company service line material identified and 73% of customer service line material identified, detailed further below.

The Company will update its Service Line Inventory as progress is made on completing the inventory and as new water systems are acquired. Section II.B.9 provides further discussion on integration of acquired systems into the Company’s LSLR Plan.

**Table 1** below shows total material type identification across Aqua’s service territory.

**Table 1 – Current Service Line Inventory Summary**

<b>Material Type</b>	<b>Company</b>	<b>Customer</b>
Lead	46	370
GRR	880	9,540
Non-lead	392,346	322,776
Lead status unknown	39,858	100,444
<b>Total</b>	<b>433,130</b>	<b>433,130</b>

The current Service Line Inventory with location identifiers is being developed and will be available on Aqua’s website as further described in Section II.C.2.

**B. Planning and Replacements**

**1. Aqua’s Projected Annual Investment and Sources of Financing**

The Company proposes a cap up to 1,500 replacements annually. Anticipated sources of financing for the replacements will include short term debt of the Company converted at a later time into long term debt and equity. The Company is also exploring low-cost/no cost financing through the Pennsylvania Infrastructure Investment Authority (“PENNVEST”) and other sources as they become available. As the Company identifies systems requiring significant LSL replacement, the Company will explore funding opportunities to reduce costs to ratepayers.

**2. Aqua’s Projected LSLRs Per Calendar Year and Description of Projection Development**

The Company is projecting the following replacements during the term of this LTIP as set forth in **Table 2**:

**Table 2 – Projected COLSL Replacements During LTIP Period**

2023	2024	2025	2026	2027
500	1,200	1,500	1,500	1,500

Aqua currently has 39,844 company-owned service lines which are identified as lead status unknown. The Company’s inventory identifies 100,444 customer side service lines that are lead status unknown. In addition to finding and replacing lead service lines, the addition of galvanized service lines that are or ever have been downstream from a lead service line or lead gooseneck are GRR and are eligible for replacement under Act 120 and therefore have increased the potential number of replacements needed throughout Aqua’s systems. Aqua believes 2% or 2,008 of the unknown customer side service lines are potentially lead or GRR that will need to be replaced. Currently, the Company’s inventory using the assumptions described above indicate that 11,918 customer LSLs will need to be replaced. These numbers are subject to change as the Company continues to develop its inventory and can change based on evolving regulatory requirements. The projections for 2023-2027 are consistent with Aqua’s annual cap proposed in this LTIP and LSLR Plan.

**3. Prioritization Criteria**

The Company considered the following prioritization criteria when developing the LSLR Plan:

- Individual Properties
  - Emergency Repairs revealing LSLs.
  - Homes with elevated lead concentrations in tap samples.
  - Schools and licensed day care facilities
  - Homeowners that request replacements.
  - Homeowners in systems that do not have widespread LSLs.

- Systems
  - Systems with higher projected lead or GRR replacements.
  - Systems where PENNVEST or other funding is available.
  - Systems with aging water mains that require replacement.

#### **4. Processes and Procedures to Address Emergency Repairs and Replacements Which Reveal LSLs**

When the Company uncovers an LSL while completing emergency repairs to its system, if both the customer side and Company side of the service line are lead, the Company will contact the customer/owner and provide them with the information and materials in Section II.B.6. and prioritize the replacement of the entire service line both Company and customer side. If only the customer side of the service line is lead, the Company will similarly provide the information and materials in Section II.B.6. and prioritize the replacement of the COLSL. The Company will also provide the materials and information in Section II.B.6 to residents of a premises who are neither customers nor owners, but occupy the premises.

When the Company uncovers an LSL while completing emergency repairs to its system, and the LSL is Company-owned, the Company will replace its service line up to the curb stop but will not make the connection, and this excavation will reveal the customer-side material. Upon verification that the customer's service line is not lead, the Company will complete the Company-side replacement and restore service to the property. The Company will provide the customer with information regarding lead, pitcher filters, and flushing instructions as described below. If the customer's service line material is lead or GRR, the Company will neither make the connection nor restore service, and the Company will provide the resident with the information and materials in Section II.B.6. and immediately coordinate and prioritize replacement of the COLSL.

#### **5. Processes and Procedures to Obtain Acceptance of a LSLR Prior to Project Commencement When the Customer Is and Is Not the Property Owner**

For areas deemed high-risk, the Company or its third-party representatives will send pre-investigative letters to customers in preparation for the commencement of a main replacement project and will request authorization to gain access to a structure using pre-investigation letters (**Exhibit A**), requesting access to review the material type of the customer's service line. Aqua personnel or Aqua's third-party vendor will visit each customer premise within the scope of the project with an unknown service line material to identify material type of the customer service line. Aqua plans on engaging customers/residents throughout its footprint with surveys (**Exhibit B**) sent by mail requesting customer participation in identifying service line materials. The Company will also be developing additional survey materials to engage customers/residents to assist the Company in completing the Service Line Inventory. If the Company uncovers a Company side LSL or a COLSL during maintenance or construction activities, the Company will provide a form (**Exhibit C**) to the resident if the resident is at the premise or will post the form if the resident is not at the premise and attempt to contact the resident through via phone to follow up with further information.

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If there is no response to the pre-investigation letter or form, Aqua personnel or its third-party vendor will visit the premises to obtain acceptance in-person. If there is no response to door knocks, a door hanger (**Exhibit D**) will be left at the premises providing an Aqua contact number and requesting access to the resident/property owner's property to identify the service line material. If there is no response to the in-person outreach, a list is generated and Aqua will call the resident. If the Company does not receive a response, it will initiate the 10-day shut-off procedures (**Exhibit E**) to get access and review the service line material. If there is still no contact, Aqua will commence with the shut-off of service and require access to review the service line material as a condition to restore service.

After making contact with the resident and identifying the presence of a COLSL, Aqua personnel will ask whether the resident is the owner or renter of the building. If the customer is the owner, and they agree to participate in the replacement, then the Company will provide the information and materials in Section II.B.6 below. If the customer is the owner and refuses to participate in the replacement the Company will follow the provisions of Section II.B.10, below. If the resident is not the property owner, the Company will obtain the owner's contact information from the resident and call the owner to explain the program to the owner and provide the owner with a copy of the Customer Lead/Galvanized Service Line Replacement Agreement ("Replacement Agreement") (**Exhibit F**). If the Company does not receive a response to telephone calls to the owner, the Company will send a letter to the property owner (**Exhibit G**) explaining the program and request that the property owner contact the Company. If the property owner does not respond, the Company will explore all options to encourage property owners to participate, such as contacting the municipality and the local code enforcement in which the property is located, and, in certain circumstances, at the Company's discretion, using Step In Rights as described in Section II.B.10. If the Company has not received acceptance after multiple efforts to contact the property owner and obtain the Replacement Agreement, the Company will initiate the 10-day shut-off process.

By obtaining agreement of the property owner prior to commencing the main replacement project, the Company can more quickly and efficiently complete the main replacement and associated restoration. The Company will not be faced with having to delay a planned project or put an ongoing project on hold (including incomplete restoration) if the service line material cannot be identified or an LSL is discovered during a project. The Company would not have to stop mid-project to identify the service line material and get the owner's consent while potentially keeping two mains in service or having an open cut in a roadway. As such, there is less disruption to traffic, customers' daily lives, and reduced safety concerns of open construction.

## **6. Processes and Procedures Based on Acceptance of a LSLR**

If the resident or property owner expresses that they want to participate in Aqua's LSLR Program after their service line has been identified as lead, Aqua will provide the following information to the customer:

- Customer Lead/Galvanized Service Line Replacement Agreement and postage-prepaid and pre-addressed envelope to the Company (**Exhibit F**).

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- Lead Fact Sheet providing educational information about lead in drinking water (**Exhibit H**).
- Information Sheet explaining Aqua's Lead Service Line Replacement Program (**Exhibit I**).
- Post-COLSL replacement flushing instructions (**Exhibit J**).
- Pitcher filter with six months of replacement cartridges (**Exhibit L**).

When the above information is provided to the resident/property owner, the Company will explain to the resident/property owner that a plumber will contact them and schedule the replacement of the COLSL. If the resident/property owner does not return the Replacement Agreement, the Company will contact the resident/property owner until it receives a signed copy of the Replacement Agreement, which will be retained by the Company. During a main replacement project, the Company will proceed with the procedures set forth in II.B.10. if the signed Replacement Agreement is not returned.

The Replacement Agreement allows a third-party licensed professional to enter the property and complete the LSLR. The agreement authorizes the Company and the contractor performing the work to access the resident/property owner's property, confirms the ownership of the service line following installation, and provides a warranty on the work completed. Further, the agreement requires that the contractor install the replacement service line and restore the property as reasonably as practicable to the condition that existed prior to the LSLR.

Following replacement, Aqua personnel will visit the customer's property within 5 business days after the COLSL replacement to reinstall or exchange the meter.

Atypical conditions for a LSLR may include (a) the property owner has passed away and an executor is seeking replacement, (b) a person selling property during main replacement project, or (c) a service line serving multiple properties. As these situations arise, the Company will require documentation and, in the Company's judgment, get the proper authorization to complete the replacement.

In closing out the project, the Company will then provide a letter (**Exhibit L**) to the customer 3-6 months post-replacement confirming the provisions in the Replacement Agreement for project close-out. The letter confirms the newly installed customer service line has been transferred back to the property owner and reminds the resident/property owner of the warranty for the completed work. The Company will also offer to provide sampling materials for post replacement 5<sup>th</sup> liter sampling. If the resident agrees, the Company will provide instructions for post-replacement 5<sup>th</sup> liter sampling (**Exhibit M**). Following 5<sup>th</sup> liter sampling, Aqua will call and mail 5<sup>th</sup> liter sampling results within 10 business days for results less than 10 ug/L and within 3 calendar days for results greater than 10 ug/L (**Exhibit N**).

## **7. Lead/Material Recycling and Disposal Efforts**

When a customer LSLR occurs, Aqua's vendors make an attempt to pull the entire length of the line which reduces excavation and restoration costs. However, often the line cannot be pulled through and is abandoned in place. Aqua's third party vendors who complete the replacements will dispose of any lead material removed at recycling centers. No proceeds are provided to Aqua of the recycled material removed by the vendors.

For Company side LSL replacements, Aqua attempts to pull the entire length of the line which reduces excavation and restoration costs. However, often the line cannot be pulled through and is abandoned in place. Any lead material removed during a Company side LSL replacement will be brought back to the division office and put in our recycling containers to be taken to the recycling center. The scrap metal that is recycled is booked into a removal and salvage account and amortized over 5 years.

## **8. Industry Accepted Practices**

The Company will adhere to the provisions of its tariff regarding replacement of company-side service lines. In addition, the Company will require Company personnel and its contractors to comply with any applicable plumbing codes related to customer-side service line replacement. The Company will follow Commission regulations regarding LSLRs including prevention of partial service line replacements and termination of service provisions, if needed to prevent partial LSL replacements.

## **9. Integration of Acquired Systems in the LSLR Plan**

Where the Company acquires a water system prior to the deadline for water systems to complete their Service Line Inventories, the Company will take over the water system's efforts, if any, to identify and incorporate the service line materials of the system in to Aqua's overall Service Line Inventory. This will include the efforts described in Section II.A., above.

For water systems acquired after the deadline for complete Service Line Inventories, the Company will incorporate the system's completed inventory into the Company's Service Line Inventory. It must be noted that some systems may not have completed a Service Line Inventory to the standards that the DEP and Commission regulations require either due to lack of resources or other reasons. In these instances, during the acquisition process, the Company, to the extent feasible will work with the selling entity to begin the steps necessary to develop a Service Line Inventory and will continue those efforts after closing on the system. However, an incomplete Service Line Inventory by the selling entity should not hold up a closing on the system. The Company can more easily fold the acquired system into the Company's LSLR Program and complete the inventory post-closing where the Company can access the customers' meters and view service line material.

In these situations, the Company will explain its plans to complete the Service Line Inventory for the to-be-acquired system, and how those efforts will continue post-closing, and

provide updates to the Commission on the progress of the Service Line Inventory for the subject system in its LSLR Program Reports.

## **10. Procedure Regarding Refusal of Offer to Replace a LSL**

During a LSLR project, if the resident/property owner refuses to replace, and the Company has either made contact with the resident/property owner and they refuse, or where the resident/property owner is non-responsive to the Company's requests as described in Section II.B.5 to replace the COLSL, Aqua will initiate termination procedures. Termination procedures include posting of 10-day shut off notices, and other required contacts under the Commission's regulations. When the Company provides the 10-day shut off notice to the customer (either through and delivery or posting at the customer's premises), the Company will also provide the Customer Refusal Letter (**Exhibit O**) the Lead Fact Sheet describing the health hazards of lead service lines (**Exhibit H**), and the Lead Service Line Program Information Sheet (**Exhibit I**) which explains the requirements for reimbursement and the potential for termination of service.

In certain circumstances and in the Company's sole discretion, the Company may utilize Step In Rights as described in its tariff to perform a replacement where it will avoid termination of service to an occupant that is not the customer or property owner. Under these limited circumstances, the Step In Rights will be used when the Company has attempted to contact the property owner to replace the COLSL, the structure is occupied by a party that is not the property owner, and the Company has attempted to get authorization to replace the COLSL, the property owner cannot be identified, or the property owner has been notified of the offer to replace the COLSL and has not responded.

The Company's representatives will include notes within its customer information system documenting the refusal or non-response and complete any termination procedures as needed if the customer/property owner continues to refuse to replace the COLSL or does not respond.

## **C. Communications, Outreach and Education**

Aqua's communications activities listed and described in the following sections are in accordance with EPA regulations at 40 C.F.R. § 141.85.

### **1. Printed and Broadcast Materials**

As described in Section II.B above, and as further supplemented here, below is a list of all printed and broadcast materials the Company plans on distributing under different scenarios of COLSL replacement efforts. These materials may change or be updated from time to time.

- Exhibit A – Pre-investigative letters to identify service line material.
- Exhibit B – Customer surveys.
- Exhibit C – Form provided to customer if the Company discovers a LSL or GRR during construction or maintenance activities.
- Exhibit D – Door hanger placed if contact is not made with customer to identify service line material.

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- Exhibit E – 10 day shutoff notice.
- Exhibit F – Customer Lead/Galvanized Service Line Replacement Agreement.
- Exhibit G – Letter to customer requesting participation in the replacement program.
- Exhibit H – Lead Fact Sheet providing educational information about lead in drinking water.
- Exhibit I – Lead Service Line Replacement Program Information Sheet.
- Exhibit J – Post-COLSL replacement flushing instructions.
- Exhibit K – Pitcher filter.
- Exhibit L – COLSL replacement close out letter.
- Exhibit M – 5<sup>th</sup> Liter sampling instructions.
- Exhibit N – 5<sup>th</sup> Liter sample results letter.
- Exhibit O – Letter provided if customer refuses replacement.

In addition to the above communication materials, Aqua has developed letters to be distributed as required by EPA regulations when they take effect:

- Exhibit P – Public education materials when elevated lead levels are found in a system.
- Exhibit Q – Notification of individual tap results from lead tap monitoring.
- Exhibit R – Notification of known service line containing lead.
- Exhibit S – Notification of known service line that is GRR.
- Exhibit T – Notification of a lead status unknown service line.
- Exhibit U – Notification of a disturbance to a lead, GRR, or lead status unknown service line that results in the service line being shut off or bypassed.
- Exhibit V – Notification of a disturbance to a lead, GRR, or lead status unknown service line from the replacement of an inline water meter, a water meter setter, or gooseneck, pigtail, or connector.
- Exhibit W – Press release regarding action level exceedance.

## **2. Aqua’s Website**

The Company currently has developed a section of its website that houses information related to Lead and its LSLR Program.

<https://www.aquawater.com/about-water/water-quality/lead.php>

Aqua’s website provides information on sources of lead, the health effects of lead, the Company’s compliance with lead requirements, how residents can protect against lead exposure, and a help line for residents requiring assistance in determining their service line material. The website also includes information on Aqua’s LSLR Program including the status of current efforts to replace LSLs, a video on how customer/property owner can review their service line material and report it to Aqua through an online form, flushing instructions post-replacement, a video showing how to take a sample with the sample bottles provided by Aqua, and reimbursement requirements.

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The Company is currently developing an online tool to show the replacement schedule by geographical location, six months into the future. This tool will be completed in accordance with the timeline set forth in the Commission's regulations.

This same online tool will be able to be used by customers/property owners to determine if they are within the required radius of a project and within the required time of the commencement of a project, thereby allowing them to determine their eligibility for reimbursement. The online tool will also show the material type of the service line, if known. The Company's website currently provides an online form a customer can fill out regarding their service line material with the ability to attach pictures.

The Company has identified project phases that will be completed in specified segments of time to implement the online tool. The first project phase will entail the development of the required functions in the tool which will allow customers/property owners to fulfill the needs indicated above. This project phase has an anticipated completion in the fourth quarter of 2023. The second project phase, occurring in early 2024, will entail user acceptance testing. In this phase, the Company will confirm that the developed tool meets all criteria and provided capabilities set forth in the regulations. This phase has an anticipated completion in the first quarter of 2024. In the third project phase, the Company will complete the deployment of the tool to its customers/property owners. The tool will be made accessible on the Company's website and future customer portal to allow customers/property owners to seamlessly confirm if they meet the criteria specified above. The anticipated completion of this phase will be the second quarter of 2024.

### **III. CONCLUSION**

The Company will continue to develop its Service Line Inventory and replace COLSLs in accordance with this LSLR Plan and work toward the goal of removing all LSLs from its system. The Company's LSLR Plan will be updated as needed.

# EXHIBIT A

Pre-Investigative Letters



[DATE]

«Property\_Owners»  
«Address\_1»  
«Address\_2»

RE: Property at «Service\_Address»

Dear Customer,

Aqua Pennsylvania is completing a service line material inventory as required by the United States Environmental Protection Agency (USEPA), the Pennsylvania Department of Environmental Protection (PADEP), and the Pennsylvania Public Utility Commission (PAPUC). We have two options available for you to identify your service line material. The first option is self-reporting that involves either filling out a survey (enclosed) that can be mailed back to us, or using the QR Code provided on the survey to upload your survey responses. The second option is to schedule an appointment to have your water service line inspected to determine its material of construction, and more specifically, to determine if you have a lead or galvanized service line. To complete this study in a timely manner, Aqua has hired a contractor, [CONTRACTOR]. If you select the second option, [CONTRACTOR] will have an inspector visit your home to collect information regarding service line material.

The presence of a lead or galvanized water service line does not mean that drinking water in your home is contaminated with lead; however, removal of the lead or galvanized service line eliminates any future possibility of lead entering your water supply from the water service line. You can learn more about lead in drinking water and steps you can take to minimize exposure by calling the Safe Drinking Water Hotline at (800) 426-4791, or by visiting the EPA website at <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>.

If our inspection reveals that you have a lead or galvanized service line, **Aqua will replace, AT NO DIRECT COST TO YOU, any part of your service line that is constructed of lead or galvanized pipe. The service line extends from the water main in the street to your water meter.** Aqua will install the new service line and you will own and maintain the new service line as a part of your property. We will provide you with additional service line replacement information if we identify that your service line is lead or galvanized.

If you prefer to have your service line inspected in person, please call the [PHONE NUMBER] between the hours of 8am-5pm to schedule an appointment. Appointments will be available on select weekdays, evenings and Saturdays. Please state that you are calling to have your water line inspected for lead or galvanized pipe. We thank you in advance for your support for this important initiative.

Sincerely,

Michael Fili, Vice President  
Capital Planning, Design & Construction  
Aqua Pennsylvania





[DATE]

\*\*\*\*FINAL ATTEMPT TO REACH YOU BEFORE FURTHER ACTION TAKEN\*\*\*\*

Dear Customer,

Aqua Pennsylvania (Aqua or the Company), through its contractor, [CONTRACTOR], has attempted to reach you on multiple occasions regarding a significant project that is under way in your area. Aqua requires that you identify your service line material or permit [CONTRACTOR] to access to the Company's meter at your property.

As required by the United States Environmental Protection Agency (USEPA), the Pennsylvania Department of Environmental Protection (PADEP), and the Pennsylvania Public Utility Commission (PAPUC), Aqua is completing a service line material inventory. We have two options available for you to identify your service line material. The first option is self-reporting that involves either filling out a survey (enclosed) that can be mailed back to us, or using the QR Code provided on the survey to upload your survey responses. The second option is to schedule an appointment to have your water service line inspected to determine its material of construction, and more specifically, to determine if you have a lead or galvanized service line. If you select the second option, [CONTRACTOR] will have an inspector visit your home to collect information regarding service line material. Failure to select one of these methods may result in further action taken by Aqua to obtain the required information, including requiring you to permit access to the Company's meter at your property and potential termination of service for failure to provide access.

The presence of a lead or galvanized water service line does not mean that drinking water in your home is contaminated with lead; however, removal of the lead or galvanized service line eliminates any future possibility of lead entering your water supply from the water service line. You can learn more about lead in drinking water and steps you can take to minimize exposure by calling the Safe Drinking Water Hotline at (800) 426-4791, or by visiting the EPA website at <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>.

If our inspection reveals that you have a lead or galvanized service line, **Aqua will replace, AT NO DIRECT COST TO YOU, any part of your service line that is constructed of lead or galvanized pipe. The service line extends from the water main in the street to your water meter.** Aqua owns the portion of the service line from the main in the street to the curb stop or edge of right of way (Aqua Service Line). You own the portion of the service line from the curb stop or edge of right of way through your property and into your structure (Customer Service Line). Aqua will install the new service line and dedicate back to you the Customer Service Line and you will own and maintain the new Customer Service Line as a part of your property. We will provide you with additional service line replacement information if we identify that your service line is lead or galvanized.

If you prefer to have your service line inspected in person, please call the [PHONE NUMBER] between the hours of 8am-6pm to schedule an appointment. Please state that you are calling to have your water line inspected for lead or galvanized pipe. It is important that we hear from you soon. We thank you in advance for your support for this important initiative.

Sincerely,

Michael Fili, Vice President Capital Planning, Design & Construction

# EXHIBIT B

## Customer Surveys



## Customer Lead and Copper Survey

To comply with Pennsylvania Public Utility Commission (PAPUC), Pennsylvania Department of Environmental Protection (PADEP) and Environmental Protection Agency (EPA) regulations, Aqua is compiling a database of the materials used in our customer’s service lines. Please take a few minutes to complete this survey. If you have questions or would like assistance, please call [PHONE NUMBER] between the hours of 8am-5pm to schedule an appointment. Please state that you are calling about the Aqua [SPECIFIC DIVISION] Water Survey.

**To save time we provide a QR Code to complete this survey online:**

*(If you choose to complete this online, you may recycle these materials.)*



Name of person filling out the survey: \_\_\_\_\_

Phone number should we have questions: \_\_\_\_\_

1. Home Address: \_\_\_\_\_
2. Year home built: \_\_\_\_\_
3. If known, what type of material is the service line coming into your home? Please provide a picture for verification via email to [EMAIL ADDRESS] or mail back with this survey. See included pipe identification instructions.

\_\_\_Lead    \_\_\_Copper    \_\_\_Plastic or PVC or PEX    \_\_\_Galvanized

**\*If other or unknown please CALL [PHONE NUMBER] to verify.**

### Water Pipe and Service Line Material Identification

	Lead	Galvanized Iron	Copper
<b>Outer Appearance</b>	Dull gray, bendable; Often curves between wall/floor and valve	Dark gray or black; Straight rigid pipe	Brown; Can have green corrosion spots
<b>Threads at connections</b>	None	Yes	None
<b>Scratch Test (coin or key)</b>	Shiny silver	Hard to scratch, remains gray	Copper, like a penny
<b>Magnet Test</b>	Does not stick	Magnet WILL stick	Does not stick

Please return completed survey in the enclosed self-address envelope to [ADDRESS]

# How to Identify Water Service Line and Water Pipe Materials in Your Home

## Water Service Line and Pipe Material Identification Instructions

### Step 1

Locate the water service line entering your home which is usually located in the basement or a crawlspace. The service line is typically just before the whole-house shut-off valve which should be near where the water service enters the home.

### Step 2

Use the identification sheet below to help identify your service line material (copper, lead, galvanized or plastic pipe).



- **Lead** – pipe is NOT threaded, it is soft, easily scraped, dull silver-gray in color, and a magnet does NOT stick to the pipe. Use flat edge of a screwdriver (or similar tool) to scrape the pipe. If the scraped area is shiny and silver, the line is lead.
- **Copper** – the color of a penny and not threaded
- **Galvanized** – pipe is threaded, dull silver-gray in color, and magnet will typically stick to the pipe
- **Plastic** – white, blue, or black rigid plastic pipe

### Follow these steps:

#### You will need:

- Key or a coin
- Strong refrigerator magnet

1. Find the water meter in your basement. Look at the pipe that comes through the outside wall of your home and connects to your meter.
2. Carefully scratch the pipe (like you would a lottery ticket) with a key or a coin. Do not use a knife or other sharp tool. Take care not to make a hole in the pipe. If the scratch turns a shiny silver color, it could be lead or steel. **NOTE: If pipe is painted, use sandpaper to expose the metal first.**
3. Place the magnet on the pipe. If a magnet sticks, it is a steel pipe.

#### Other ways you can check for lead:

- Purchase a lead test kit at a hardware or home improvement store. These kits test what the pipe is made from—not the water inside. Look for an EPA recognized kit.
- A [licensed and insured plumber](#) can inspect your pipes and other plumbing for lead or steel. Replacing an older brass faucet or valve might reduce the lead in water.



Thank you for taking time out of your busy schedule to complete and return this survey. The data collected will help us to provide an accurate inventory of water service line materials in your community to eliminate lead from service lines.

Please return completed survey in the enclosed self-address envelope to [ADDRESS]

# EXHIBIT C

Construction and Maintenance Activities  
Discover Lead Line Form



An Essential Utilities Company

Premises No.: \_\_\_\_\_ Tap Serial No.: \_\_\_\_\_ Date: \_\_\_\_\_

Address: \_\_\_\_\_

Prepared by: \_\_\_\_\_

PWSID: \_\_\_\_\_ PWS Name: \_\_\_\_\_

¡Favor de no consumir el agua sin antes comunicarse con nuestro Departament de Servicio al Cliente al 877.987.2782!

# An Important Health Notice From Aqua



**PLEASE READ THIS BEFORE USING YOUR WATER!**

During our maintenance/construction activities today, Aqua encountered:

- An Aqua-owned lead service line
- An Aqua-owned galvanized service line

that provides water from our water main to the curb stop.

Please note that:

- It has been replaced today.
- It will be replaced by: \_\_\_\_\_

The customer-owned service line that provides water from the curb stop into your house is constructed of:


We encourage you to review the flushing instructions below and the information about lead on the back of this form. We will:

1. contact you to arrange for tap water sampling and
2. provide you with a pitcher filter to protect you from lead.

In the meantime, please call us if you would like additional information at 877.987.2782.

Please review and follow these very important **instructions\*** to minimize your exposure to metals, such as lead, which might have been stirred up due to the customer-owned service line replacement work.

Please flush all your faucets using these steps:

-  **1** If possible, remove faucet aerators from all water faucets in the home.
- 2** Beginning in the lowest level of the home, fully open the cold water faucets throughout the home.
- 3** Let the water run for at least 30 minutes at the last faucet you opened (which was on your top floor).
- 4** Turn off each faucet starting with the faucets in the highest level of the home. Be sure to run water in bathtubs and showers as well as faucets.
- 5** Clean and reinstall any aerators you might have removed in Step 1.
- 6** Do not consume tap water, open hot water faucets, or use icemaker or filtered water dispenser until after flushing is complete.

*\*Based on the American Water Works Association-recommended safety procedures (awwa.org).*

You might also wish to use a NSF-approved home filter for water to be used for drinking and cooking, particularly if you are pregnant or have children under age six. Go to NSF.org for more information.

Please see the other side of this notice for more information on lead. Thank you for letting Aqua serve you! For questions or concerns, please contact Aqua customer service at 877.987.2782.

**More helpful information on the back**





An Essential Utilities Company

Premises No.: \_\_\_\_\_ Tap Serial No.: \_\_\_\_\_ Date: \_\_\_\_\_

Address: \_\_\_\_\_

Prepared by: \_\_\_\_\_

PWSID: \_\_\_\_\_ PWS Name: \_\_\_\_\_

¡Favor de no consumir el agua sin antes comunicarse con nuestro Departament de Servicio al Cliente al 877.987.2782!

# An Important Health Notice From Aqua

**PLEASE READ THIS BEFORE USING YOUR WATER!**

During our maintenance/construction activities today, Aqua encountered:

- An Aqua-owned lead service line
- An Aqua-owned galvanized service line

that provides water from our water main to the curb stop.

Please note that:

- It has been replaced today.
- It will be replaced by: \_\_\_\_\_


The customer-owned service line that provides water from the curb stop into your house is constructed of:

We encourage you to review the flushing instructions below and the information about lead on the back of this form. We will:

1. contact you to arrange for tap water sampling and
2. provide you with a pitcher filter to protect you from lead.

In the meantime, please call us if you would like additional information at 877.987.2782.

Please review and follow these very important **instructions\*** to minimize your exposure to metals, such as lead, which might have been stirred up due to the customer-owned service line replacement work. Please flush all your faucets using these steps:

- |   |   |   |
|---|---|---|
| <p><b>1</b>  If possible, remove faucet aerators from all water faucets in the home.</p> | <p><b>2</b> Beginning in the lowest level of the home, fully open the cold water faucets throughout the home.</p> | <p><b>3</b> Let the water run for at least 30 minutes at the last faucet you opened (which was on your top floor).</p>                          |
| <p><b>4</b> Turn off each faucet starting with the faucets in the highest level of the home. Be sure to run water in bathtubs and showers as well as faucets.</p>           | <p><b>5</b> Clean and reinstall any aerators you might have removed in Step 1.</p>                                | <p><b>6</b> Do not consume tap water, open hot water faucets, or use icemaker or filtered water dispenser until after flushing is complete.</p> |

*\*Based on the American Water Works Association-recommended safety procedures (awwa.org).*

You might also wish to use a NSF-approved home filter for water to be used for drinking and cooking, particularly if you are pregnant or have children under age six. Go to NSF.org for more information.

Please see the other side of this notice for more information on lead. Thank you for letting Aqua serve you! For questions or concerns, please contact Aqua customer service at 877.987.2782.

More helpful information on the back



# Information About Lead and Drinking Water



## How does lead get into drinking water?

Lead is not typically found in the streams, reservoirs or wells that serve as our water supplies. The main water lines that carry water from treatment plants to customers don't contribute to lead. The main source of lead in drinking water is from lead service lines (the pipelines that deliver water from the water mains in the street to homes) and from household plumbing that contains lead.

Before the use of copper for water pipes, lead was once a material of choice. Before 1986, lead was also a key component of the solder used by plumbers when installing home plumbing. Lead is even found in brass and bronze plumbing fixtures. The chemical properties of water can cause lead and other metals to leach into the water. Water utilities, including Aqua, treat drinking water to reduce the chance for metals to leach into the water.

Customers who have, or think they might have, lead service lines are strongly encouraged to replace their service lines. If customers choose to replace their household plumbing, they should use certified lead-free solder and fixtures.

## How Aqua protects its customers:

Aqua conducts required testing for drinking water contaminants, including lead and copper, to ensure compliance with state and federal drinking water standards. Aqua also tests for lead in high-risk sample homes to comply with the U.S. Environmental Protection Agency's (EPA) lead and copper rule. According to the EPA, sampling locations must be selected based on priority tied to possible lead exposure. Aqua also works with individual customers who request lead information for their home. Test results, including those for lead and copper, are summarized in our annual water quality reports, which are produced for every water system we own and operate. You can find your community's water quality report on [AquaAmerica.com](http://AquaAmerica.com).

Changes in water sources are not common. However, if we ever need to use a new water source, Aqua works with state environmental regulators to perform an early evaluation of the new source to anticipate water quality concerns and identify potential treatment needs.

Once a new water source is approved, Aqua further verifies the acceptability of water quality by conducting testing at approved high-risk homes for a sustained period of time to ensure water quality.

## Health effects of lead:

Lead can cause serious health problems if too much enters your body from drinking water or other sources. It can cause damage to the brain and kidneys and can interfere with the production of red blood cells that carry oxygen to all parts of your body. **The greatest risk of lead exposure is to infants, young children and pregnant women.** Scientists have linked the effects of lead on the brain with lowered IQ in children. Adults with kidney problems and high blood pressure can be affected by low levels of lead more than healthy adults. Lead is stored in the bones, and it can be released later in life. During pregnancy, the child receives lead from the mother's bones, which may affect brain development.

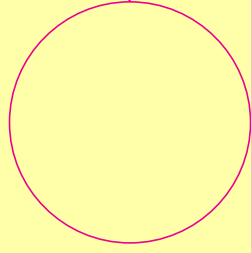
**If your home's water shows elevated levels of lead, or if you are concerned about the potential of lead in your water, here are ways you can minimize exposure.**

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run water for at least 15 to 30 seconds or until it becomes cold or reaches a steady temperature before using it for drinking or cooking.
- **Use cold water to cook and prepare baby formula. Don't boil water to reduce lead.** Lead dissolves more easily into hot water. Boiling water won't reduce lead.
- If you buy a water filter, make sure it's approved to reduce lead. You can contact NSF International at 800.NSF.8010 or [NSF.org](http://NSF.org).
- If you are concerned about exposure, contact your local health department or healthcare provider to find out how you can get your child tested for lead. Call Aqua at 877.987.2782 for information about testing your water for lead.
- Brass faucets, fittings and valves – even those advertised as lead free – might contribute lead to drinking water. The law allows end-use fixtures, such as faucets, with wetted surfaces containing a maximum weighted average of 0.25 percent lead to be labeled as lead free. Visit NSF International at [NSF.org](http://NSF.org) to learn more.

**For more information** on reducing lead exposure in your home and the health effects of lead, visit the EPA at [EPA.gov/lead](http://EPA.gov/lead) or contact your healthcare provider.

# EXHIBIT D

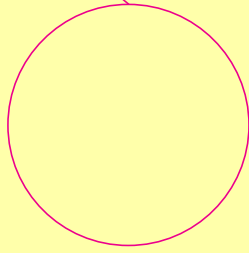
Door Hanger



# IMPORTANT NOTICE

**AQUA**<sup>SM</sup>

An  Essential Utilities Company



## We're sorry...we missed you!

A company representative was at your property today.

Date: \_\_\_\_\_ Time: \_\_\_\_\_

The purpose(s) of our visit was to:

Gain Access to Conduct Service Line Inspection

Other/Comments: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

\* If unable to provide access for service line inspection, please fill out the survey provided via mail and/or QR code. If a survey was not received please contact the ERM Call Center via the information provided below.

### Please Contact Us

**ERM Call Center: (610) 679-9058**

# AQUA<sup>SM</sup>

An  Essential Utilities Company

# EXHIBIT E

10 Day Shutoff Notice

# 10-Day Shut Off Notice

## DATE NOTICE ISSUED:

Name: \_\_\_\_\_

Service Address: \_\_\_\_\_

Premise No. \_\_\_\_\_

In order for Aqua Pennsylvania, Inc. to continue supplying water service to your residence/business, you need to take immediate action. If the information **marked** below is not provided within the next 10 days, we will shut off the water service at the above address on or after 8:00 A.M. on \_\_\_\_\_ **Aqua may act on this notice for up to 60 days.**

## THIS ACTION WILL BE TAKEN FOR THE FOLLOWING REASON:

1. Your Bill For \$ \_\_\_\_\_ is Overdue. Call 1.877.987.2782 (and choose Collections).

### 2. Meter Operations:

- ACT 120 Lead Service Line Inspection or Replacement. Call 610.645.4272 to speak with Water Quality.  Inactive Account - Apply for Water Service
- Meter Equipment Inspection  Exchange or Install Meter  Meter Space Does Not Meet Aqua PA Specifications
- Customer side leak, property owner responsibility. Call 1.877.987.2782 to update repair status.

Other: \_\_\_\_\_ Call 1.877.WTR.AQUA or 1.877.987.2782.

3. **Backflow Prevention:**  Failure to Test Backflow Device  SEPA 610.541.4179 or backflow@aquawater.com  
 Failure to Install Backflow Device  GPA 1.877.987.2782 or gpabackflow@aquawater.com

## TO STOP THE SHUT OFF, YOU MUST DO THE FOLLOWING AT ONCE:

- Pay the total amount due or call 1.877.WTR.AQUA or 1.877.987.2782 (and choose Collections) to: request a payment arrangement, let us know that you made the payment, or dispute the overdue bill. If we shut off your water, you may have to pay the following charges to have your water turned back on: Overdue Amount \$ \_\_\_\_\_ ; Turn-On Charge \$ \_\_\_\_\_ ; **Payments will not be accepted by our representative. It must be paid at an authorized payment location** (call Aqua for the nearest payment location's address)
- Allow access by an Authorized Aqua Service Representative for inspection, installation or replacement of the existing meter equipment at the property. Call 1.877.987.2782 to schedule an appointment.
- Call 1.877.WTR.AQUA or 1.877.987.2782 (and choose Collections) if you or someone in your home has a serious illness or a medical condition. Read the Medical Emergency Notice shown (on the back).
- Comunicarse con Aqua al 877.987.2782 (elija "Bobranzas" - "Collectiones" en inglés para hacernos saber que realizó el pago, o para disputar el balance atrasado. También puede comunicarse con Aqua a la dirección que aparece arriba.
- **Atencion!** Este es un mensaje muy importante. Si usted no lo entiende, favor de llama a 877.987.2782.

If you have any questions or need more information, please call us, 877.987.2782. If you are not satisfied after you talk to us, you may file a complaint with the Public Utility Commission by calling 1.800.692.7380 toll free, or by writing to P.O. Box 3265 Harrisburg, PA 17105-3265. The Public Utility Commission will delay the shut off if you file a complaint before the shut off date.



An Essential Utilities Company

762 W. Lancaster Avenue  
Bryn Mawr, PA 19010-3489

## IMPORTANT TO KNOW - BEFORE WE SHUT OFF YOUR UTILITY SERVICE

- **If we shut off your service during the winter months (between Dec. 1 - Mar. 31)** we will restore your service within 24 hours of your meeting all requirements/conditions to have service reconnected. Where street digging is required it may take up to 7 days.
- If you are a victim of domestic violence and have a Protection From Abuse Order (PFA) or other court order that shows clear evidence of domestic violence, there are special protections available.  
**Call us immediately at 877.987.2782.** (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment agreement or special assistance programs. **Call 877.987.2782 right away** to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
- If your landlord pays your utility bill: You have certain legal protections. Please call us at 877.987.2782.
- If you have trouble understanding or speaking English or have a disability please call us at 877.987.2782 for free interpretation.
- If your service is shut off, you may be required to pay more than the amount listed on the front of this notice to have your service turned back on. You may have to pay any additional bills that have become past due.
- All adult occupants of the premise whose name appears on the mortgage, deed, or lease are considered "customers" and are responsible for payment of this bill.
- If service is shut off, ANY adult occupant who has been living at the premise may have to pay all or portions of this bill to have service restored.
- If your service is shut off, you must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premise.
- After all conditions have been met to have the service turned back on, it may take up to 7 days to have your service restored. Please contact us to discuss the details.
- If you need water to heat your property, please contact Aqua immediately at 877.987.2782 (and choose Collections) so we can arrange a service visit to verify that need. The company will act in accordance with the public utility laws with respect to water service shut offs.

### MEDICAL EMERGENCY NOTICE

Let us know if someone living in your home is seriously ill or has a medical condition.

**WE WILL NOT SHUT OFF YOUR SERVICE provided you:**

- A. Provide a medical certification by a licensed physician, nurse practitioner or physician's assistant.  
Medical certifications must be in writing and signed by your physician, nurse practitioner or physician's assistant by fax, email or mail within three days.

**AND**

- B. Make some equitable arrangements to pay your current bills for service.

Call **Aqua at 877.987.2782** to let us know about your medical emergency.

**FAX: 610.520.2168 or toll-free at 866.780.8301**

**ATTN: Collections Department  
Aqua Pennsylvania, Inc.  
762 W. Lancaster Avenue  
Bryn Mawr, PA 19010**

# EXHIBIT F

Customer Agreement



## LICENSE AGREEMENT TO REPLACE THE CUSTOMER OWNED LEAD/GALVANIZED SERVICE LINE

The undersigned customer(s) or property owner(s) (the “Customer”), through this License Agreement, grants Aqua Pennsylvania, Inc. (“Aqua” or the “Company”) and its contractors and/or subcontractors a license to enter upon the Customer’s property at the service address set forth below (the “Property”) for the purpose of replacing the Customer-owned lead or galvanized service line with a new Customer-side service line and connecting the new Customer-side service line to the Company’s facilities, at no direct cost to the Customer.

Service  
Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

The Customer represents that the Customer is the sole legal owner of the Property and has sole authority to agree to this License Agreement. The term of this License Agreement shall be twelve (12) months following the date this License Agreement is countersigned by the Company.

The Company owns the Company-side service line from the Company’s water main to the curb stop, meter pit, or valve (as applicable) at or near the Customer’s property line. The Company, in its sole discretion has determined the location of the Company-side service line. The Company-side service line will be owned and maintained by the Company.

The Company or the Company’s contractor and/or subcontractor shall replace the Customer-owned lead or galvanized service line with a new service line of size and material determined by the Company. The Customer-owned lead or galvanized service line will be abandoned in place. The Company shall connect the new Customer-side service line to the Company’s connecting facilities and the Customer’s premises. It may be necessary for the Company or Company’s contractor to gain entry into the Customer’s premises to make the connection at the meter with the new Customer-side service line. The ownership of the new Customer-side service line will be dedicated to the Customer at the completion of the replacement. Ownership and maintenance responsibilities of the new Customer-side service line will remain with the Customer.

Following the replacement of the Customer-side service line, the Company will restore the Customer’s Property as reasonably as practicable to the condition prior to the commencement of the replacement under this License Agreement. The Company warrants the workmanship and materials of the installation of the new Customer-side service line and restoration of surfaces for a period of two (2) years from the date the replacement is completed. The date the replacement is completed is the date water service is re-established to the Property.

The maximum coverage under the warranty on the workmanship and materials is limited to an amount up to Twenty Thousand Dollars (\$20,000.00) and limited to repairing or replacing the Customer-side service line if the failure was due to the workmanship and materials of the replacement, and restoration of surfaces which shall mean restoration as reasonably as practicable to the condition that existed prior to the replacement under this License Agreement. The Company shall not be liable for any damages beyond the maximum coverage of the two year warranty as described in this License Agreement. Should any repair be necessary under this warranty, the Customer grants Aqua and its contractors and/or subcontractors license to enter upon the Customer's Property to complete the repairs.

**In consideration of the Company performing the Customer-side service line replacement at no direct cost to the Customer and receiving the associated warranty on workmanship and materials and restoration of surfaces as set forth above, the Customer agrees to indemnify, release and hold harmless the Company and its affiliates, agents, and contractors and/or subcontractors from and against all claims, liabilities, and costs arising from acts and omissions of the Company and/or its contractors and/or subcontractors in replacing and installing the new Customer-side service line that are outside of the associated warranty on workmanship and materials and restoration of surfaces. The Customer specifically agrees to accept dedication of the newly installed Customer-owned portion of the service line upon completion of its installation.**

**PLEASE RETURN A SIGNED COPY OF THIS LICENSE AGREEMENT IN THE PRE-ADDRESSED, POSTAGE PAID, ENVELOPE TO:**

**Aqua Pennsylvania, Inc.  
762 W. Lancaster Ave.  
Bryn Mawr, PA 19010  
Attention: Water Quality Department**

Contract No.

CUSTOMER

AQUA PENNSYLVANIA, INC.

Signature: \_\_\_\_\_ Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Printed Name: \_\_\_\_\_

Date: \_\_\_\_\_ Title: \_\_\_\_\_

Phone: \_\_\_\_\_ Date: \_\_\_\_\_

# EXHIBIT G

Customer Letter – Lead Material Identified



Date

Address

Dear Aqua Customer,

Aqua Pennsylvania is implementing a lead line replacement program. Our records show that the service line at the above address is, or may be, comprised of lead.

The water service line serving your property includes a section of pipe from the water main to the curb (curb stop) that is "company-owned." There is a second section of pipe extending from the curb stop to your home that is "customer-owned." It is the property owner's responsibility to maintain the customer-owned service line.

**Aqua can replace, AT NO DIRECT COST TO YOU, your customer-owned service line from the curb line to the connection with the water meter inside your building/house.** Our contractor will excavate/tunnel from the water main to your building/house and enter your building/house to disconnect the lead service line and connect the new one. The new customer-owned service line will then be turned over to you to own and maintain as a part of your property.

To move forward with this program, please call 610.645.4272. Please leave a message that you would like your lead service line replaced with your name, address, and phone number. Someone will call you back by the next business day.

**Please note that refusal to replace the lead service line may result in termination of water service to the property.**

We thank you in advance for your support of this program.

Sincerely,

Ann Dreyer  
Supervisor, Water Quality Services

Attachments: Lead Fact Sheet



# Aqua Wants Our Customers to Be Informed\*

Here's what you should know about lead and drinking water.

Lead is not typically found in the streams, reservoirs or wells that serve as water supplies or in the main water lines that carry water from treatment plants to homes. Yet, the chemical properties of water can cause lead and other metals to leach into drinking water. The main source of lead in drinking water is from lead service lines (the pipes that deliver water from water mains in the street and into homes) and from typical household plumbing (lead solder and brass fixtures) that contains lead. Households that have, or suspect having, lead service lines or lead in their household plumbing are strongly encouraged to replace them. The use of lead in solder was prohibited after 1986, so buildings constructed after then should not have contained lead in the solder.

## How Aqua protects its customers:

Water utilities, including Aqua, treat drinking water to reduce the chance for metals to leach into the water. Aqua conducts required testing for drinking water contaminants, including lead and copper, to ensure compliance with state and federal drinking water standards. Aqua tests the water at our treatment plants, and also schedules customer tap sampling and tests for lead in potential high-risk areas, to comply with the U.S. Environmental Protection Agency's (EPA) lead and copper rule.

You can always view your community's test results. They are summarized in our annual water quality reports, which are produced for every water system we own and operate.

## Lead Service Line Replacement Program:

Aqua can now assist customers with replacing the customer/property owner's portion of the service line if it is made of lead. Aqua's new program will allow us to work with customers, either during a main replacement project or by customer request, to replace the customer/property owner's portion of the service line if it is lead and dedicate the service line back to the customer/property owner at no direct cost to the customer/property owner.

Visit our website at <https://www.aquaamerica.com/our-states/pennsylvania/leadservicelines.aspx> for more information.



Call us at 877.987.2782  
for more information.



You can find your community's  
water quality report at  
[AquaAmerica.com](https://www.aquaamerica.com).

More helpful information on the back





## If you are a residential customer:

You should know that there are parts of the service line bringing water to your home that are Aqua's property (the pipe that goes from our water main in the street to your curb) and parts of the service line that are the property owner's (the pipe that goes from your curb to your home). When we encounter lead service lines during our maintenance and construction activities, we will seek to identify the material type of both portions (Aqua's and the property owner's) of the service line. If we find lead on Aqua's side only, Aqua will replace its portion of the service line. If we find lead on the customer/property owner's side, we will work with you to replace the customer/property owner portion.

If you have concerns regarding your internal plumbing, we recommend that you have a licensed plumber check the pipes that are your property. This is important to know, because household plumbing can also be a source of lead in tap water. See the section below on "what you can do" for minimizing your risk if this happens.

**Aqua suggests that you call us at 877.987.2782 for more information. We'll quickly put you in touch with one of our water quality experts.**



## If you are a school or day care center:

You should know that the EPA has established more stringent sampling procedures for schools and day care centers. Because children often drink from fountains and faucets at school without flushing the water first, and because they are at higher risk of health effects due to exposure, for their protection, sampling is done differently at schools and day care centers.

**Aqua suggests that you call the EPA's safe drinking water hotline at 800.426.4791 or email them using this URL: <https://www.epa.gov/lead/forms/lead-hotline-national-lead-information-center>. Specific information regarding schools can be found on EPA's website at <https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water>. It's important for any testing you do to be conducted using EPA protocols, so that the results are meaningful.**

## The health effects of lead:

Lead can cause serious health problems if too much enters your body from drinking water or other sources. It can cause damage to the brain and kidneys and can interfere with the production of red blood cells that carry oxygen to all parts of the body. The greatest risk of lead exposure is to infants, young children and pregnant women.

If you are concerned about lead exposure:

- Contact your local health department or healthcare provider to find out how you can get your child tested for lead.
- Visit the EPA at [EPA.gov/lead](https://www.epa.gov/lead) for more information on the health effects of lead or reducing lead exposure in your home.
- Call Aqua at 877.987.2782 for information about testing your water.

## What you can do:

If your home's water shows elevated levels of lead, or if you are concerned about the potential of lead in your water, below are ways you can minimize your exposure.

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Don't boil water to reduce lead. Lead dissolves more easily into hot water and boiling will concentrate the lead. Boiling water won't reduce lead.
- If you buy a water filter for lead removal, make sure it's approved to reduce lead. Contact NSF International, [www.NSF.org](http://www.NSF.org).

# EXHIBIT H

## Lead Fact Sheet



# Aqua Wants Our Customers to Be Informed\*

Here's what you should know about lead and drinking water.

Lead is not typically found in the streams, reservoirs or wells that serve as water supplies or in the main water lines that carry water from treatment plants to homes. Yet, the chemical properties of water can cause lead and other metals to leach into drinking water. The main source of lead in drinking water is from lead service lines (the pipes that deliver water from water mains in the street and into homes) and from typical household plumbing (lead solder and brass fixtures) that contains lead. Households that have, or suspect having, lead service lines or lead in their household plumbing are strongly encouraged to replace them. The use of lead in solder was prohibited after 1986, so buildings constructed after then should not have contained lead in the solder.

## How Aqua protects its customers:

Water utilities, including Aqua, treat drinking water to reduce the chance for metals to leach into the water. Aqua conducts required testing for drinking water contaminants, including lead and copper, to ensure compliance with state and federal drinking water standards. Aqua tests the water at our treatment plants, and also schedules customer tap sampling and tests for lead in potential high-risk areas, to comply with the U.S. Environmental Protection Agency's (EPA) lead and copper rule.

You can always view your community's test results. They are summarized in our annual water quality reports, which are produced for every water system we own and operate.

## Lead Service Line Replacement Program:

Aqua can now assist customers with replacing the customer/property owner's portion of the service line if it is made of lead. Aqua's new program will allow us to work with customers, either during a main replacement project or by customer request, to replace the customer/property owner's portion of the service line if it is lead and dedicate the service line back to the customer/property owner at no direct cost to the customer/property owner.

Visit our website at <https://www.aquaamerica.com/our-states/pennsylvania/lead servicelines.aspx> for more information.



Call us at 877.987.2782 for more information.



You can find your community's water quality report at AquaAmerica.com.

More helpful information on the back





## If you are a residential customer:

You should know that there are parts of the service line bringing water to your home that are Aqua's property (the pipe that goes from our water main in the street to your curb) and parts of the service line that are the property owner's (the pipe that goes from your curb to your home). When we encounter lead service lines during our maintenance and construction activities, we will seek to identify the material type of both portions (Aqua's and the property owner's) of the service line. If we find lead on Aqua's side only, Aqua will replace its portion of the service line. If we find lead on the customer/property owner's side, we will work with you to replace the customer/property owner portion.

If you have concerns regarding your internal plumbing, we recommend that you have a licensed plumber check the pipes that are your property. This is important to know, because household plumbing can also be a source of lead in tap water. See the section below on "what you can do" for minimizing your risk if this happens.

**Aqua suggests that you call us at 877.987.2782 for more information. We'll quickly put you in touch with one of our water quality experts.**



## If you are a school or day care center:

You should know that the EPA has established more stringent sampling procedures for schools and day care centers. Because children often drink from fountains and faucets at school without flushing the water first, and because they are at higher risk of health effects due to exposure, for their protection, sampling is done differently at schools and day care centers.

**Aqua suggests that you call the EPA's safe drinking water hotline at 800.426.4791 or email them using this URL: <https://www.epa.gov/lead/forms/lead-hotline-national-lead-information-center>. Specific information regarding schools can be found on EPA's website at <https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water>. It's important for any testing you do to be conducted using EPA protocols, so that the results are meaningful.**

## The health effects of lead:

Lead can cause serious health problems if too much enters your body from drinking water or other sources. It can cause damage to the brain and kidneys and can interfere with the production of red blood cells that carry oxygen to all parts of the body. The greatest risk of lead exposure is to infants, young children and pregnant women.

If you are concerned about lead exposure:

- Contact your local health department or healthcare provider to find out how you can get your child tested for lead.
- Visit the EPA at [EPA.gov/lead](https://www.epa.gov/lead) for more information on the health effects of lead or reducing lead exposure in your home.
- Call Aqua at 877.987.2782 for information about testing your water.

## What you can do:

If your home's water shows elevated levels of lead, or if you are concerned about the potential of lead in your water, below are ways you can minimize your exposure.

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Don't boil water to reduce lead. Lead dissolves more easily into hot water and boiling will concentrate the lead. Boiling water won't reduce lead.
- If you buy a water filter for lead removal, make sure it's approved to reduce lead. Contact NSF International, [www.NSF.org](http://www.NSF.org).

# EXHIBIT I

## Lead Service Line Replacement Program Information Sheet

# Customer Lead Service Line Replacement Program Information Sheet



## **BACKGROUND – AQUA CUSTOMER LEAD SERVICE LINE REPLACEMENT PROGRAM**

Lead is a naturally occurring metal that can cause a variety of adverse health effects. While the most common sources of lead exposure are soil, paint chips and dust, drinking water is another route of lead exposure, primarily as a result of corrosion of lead pipes and plumbing materials. The Pennsylvania General Assembly determined it is in the public interest for water utilities to assist customers in the replacement of customer-owned lead, or galvanized requiring replacement (“galvanized”), service lines throughout Pennsylvania.

The service line that provides water service to a property is made up of two parts: a Company-owned portion (which connects from the Company’s main to the curb line) and a customer-owned portion (which connects from the curb line to a customer’s structure). Customers, or property owners if the customer is not the property owner (“Customer”) are required to maintain and repair the Customer-owned portion of the service line.

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”) now has been granted the authority to assist Customers in replacing the Customer-owned portion of the service line if that service line is identified as lead or galvanized.

## **CUSTOMER-OWNED LEAD SERVICE LINE REPLACEMENT PROGRAM**

Under the Customer Lead Service Line Replacement Program (“Replacement Program”), Aqua will identify customer-owned service lines that are lead or galvanized, enter into an agreement with the Customer to replace the Customer-owned portion of the service line and restore the Customer’s property at no direct cost to the customer, dedicate the newly installed customer portion of the service line back to the Customer, and provide a warranty on the work completed to replace the Customer-owned lead or galvanized service line.

Aqua’s Replacement Program is made up of two parts: (1) replacements in connection with a main replacement project, and (2) replacements per Customer request not associated with a main replacement project.

### **Cap on Replacements Per Year**

Aqua can perform up to 1,500 customer-owned lead or galvanized service line replacements per year.

### **Customer Agreement and Replacement**

In order for Aqua to complete a replacement, the Customer must enter into an agreement with Aqua to replace the Customer-owned lead or galvanized service line. Aqua cannot replace the Customer portion of a lead or galvanized service line without first entering into an agreement. The agreement provides that the Customer will give access to Aqua, or Aqua’s contractor, to complete the

replacement. Following replacement, Aqua, or Aqua’s contractor, will restore the property as reasonably as practicable to its former condition prior to the replacement of the Customer-owned lead or galvanized service line.

### **Dedication of Newly Installed Customer Portion of Service Line and Warranty**

After the new Customer-owned portion of the service line is installed, the Customer-owned portion will be dedicated to the Customer and ownership and responsibility for repair and maintenance of the Customer-owned portion of the service line will remain with the Customer as was the case prior to the replacement. A two-year warranty on the workmanship and materials of the installation and the restoration of surfaces shall be provided.

### **Coordination of Replacements**

Aqua will strive to group customer requested replacements within its operating divisions to create efficiencies. However, Aqua may replace a Customer’s lead or galvanized service line if projects cannot be grouped together in its discretion.

### **Filters, Sampling and Testing**

Upon identification of a customer lead or galvanized service line, Aqua will provide a National Sanitation Foundation approved water filter (pitcher or tap filter) and six months of replacement filters. At approximately 3-6 months after replacement is completed, Aqua will offer water sampling materials to Customers or residents, and if Customer or resident wants to have samples taken, Aqua will collect, test, and provide the results from those samples.

### **Reimbursement for Customers that Have Already Replaced a Lead or Galvanized Service Line**

As part of Aqua’s Replacement Program, Aqua will provide a reimbursement to those Customers that have replaced their Customer-owned lead or galvanized service line within certain time periods subject to certain requirements. Reimbursement will occur for those Customers that provide documentation sufficient, in Aqua’s sole discretion, to verify that the Customer replaced the Customer-owned lead or galvanized service line within one year before or after the start of a planned lead service line replacement project main replacement and as long as the Customer is within one mile of the main replacement project or focused replacement area. Customers will be eligible for reimbursement up to 125% of the average cost of Aqua’s lead and galvanized replacements. Average cost used to determine reimbursement amounts during a calendar year will be based on Aqua’s prior calendar year average costs for lead and galvanized service line replacements. Examples of documentation required by Aqua for a Customer to be eligible for reimbursement include, but are not limited to, detailed estimates from a licensed plumber and paid invoices or statements. A verified statement may also be submitted from the licensed plumber.

### **Partial Replacements Prohibited**

Under the Pennsylvania Public Utility Commission’s (“PUC”) regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line. If a Customer causes a partial replacement, by replacing the Customer portion of a lead or galvanized service line without notifying Aqua, Aqua is

required to terminate service until a full replacement of the lead or galvanized service line can be completed.

In addition, any Customer that refuses to allow Aqua (or its contractor) to replace the lead or galvanized service line, or refuses to employ its own licensed plumber to replace the lead or galvanized service line, will result in termination of service to the property until the entire lead or galvanized service line is replaced.

Aqua may, in its sole discretion, use Step In Rights as described in Aqua's tariff to perform a replacement if the customer or occupier of the property is not the owner, Aqua has attempted to contact the owner with an offer to replace the Customer lead service line and has not received a response, and such replacement is in the public interest to avoid termination of service to a property where the customer is not the owner of the property.

## **CONCLUSION**

Aqua recognizes the importance of removing lead from water systems across Pennsylvania both on Aqua owned and Customer-owned assets. Aqua looks forward to working with Customers to achieve this goal.

# EXHIBIT J

## Post-Replacement Flushing Instructions

¡Favor de no consumir el agua sin antes comunicarse con nuestro Departament de Servicio al Cliente al 877.987.2782!


# An Important Health Notice From Aqua\*



**PLEASE READ THIS BEFORE USING YOUR WATER!**

As part of Aqua's Customer-Owned Lead Service Line Replacement Program ("Replacement Program"), Aqua, or Aqua's contractor, replaced your customer-owned lead or galvanized service line. Before using your water please follow the flushing instructions below:

Please review and follow these very important **instructions**<sup>1</sup> to minimize your exposure to metals, such as lead, which might have been stirred up due to the service-line replacement work. Please flush all your faucets using these steps:

-  **1** If possible, remove faucet aerators from all water faucets in the home.
- 2** Beginning in the lowest level of the home, fully open the cold water faucets throughout the home.
- 3** Let the water run for at least 30 minutes at the last faucet you opened (which was on your top floor).
- 4** Turn off each faucet starting with the faucets in the highest level of the home. Be sure to run water in bathtubs and showers as well as faucets.
- 5** Clean and reinstall any aerators you might have removed in Step 1.
- 6** Do not consume tap water, open hot water faucets, or use icemaker or filtered water dispenser until after flushing is complete.

<sup>1</sup>Based on the American Water Works Association-recommended safety procedures ([awwa.org](http://awwa.org)).

You might also wish to use a NSF-approved home filter for water to be used for drinking and cooking, particularly if you are pregnant or have children under age six. Go to [NSF.org](http://NSF.org) for more information.

Please visit Aqua's website for more information concerning Aqua's Replacement program at <https://www.aquawater.com/about-water/water-quality/lead.php>. Thank you for letting Aqua serve you! For questions or concerns, please contact Aqua customer service at **877.987.2782**.

*\*This information sheet contains regulatorily required or recommended language and nothing herein is intended as, nor should be construed as, a promise of or contract for payment or reimbursement of expenses incurred for any action you take on account of this information sheet.*

# EXHIBIT K

Pitcher Filter



# BRITA® LONGLAST®

WATER FILTRATION SYSTEM

Longest-Lasting  
Lead-Removing Filter\*



**10** CUP CAPACITY  
1.5 LITER (50.7 FL. OZ.)  
MADE BY POLYMER BLENDS  
1 PITCHER / 1 FILTER

**REDUCES**  
**99% OF LEAD,**  
Mercury, Chlorine, Benzene and More  
(See back panel for details)

FILTER LASTS

**6**  
months\*

100 Gallons

\*See certifications.  
†Approximate timing based on  
100 gallons flow rate and average  
home usage of 11 gallons per day.

**BRITA**  
**LONGLAST**  
WATER FILTRATION SYSTEM

Small Filter, Big Impact™

GREAT-TASTING WATER WITHOUT THE WASTE™

With Brita LONGLAST,® enjoy 6 months (120 gallons) of cleaner, great-tasting water. Change your filter less often and replace up to 1,800 bottles each year.\*

\*Standard 16.9 oz. single-use water bottles

GET TO THE GOOD STUFF — WHAT WE FILTER OUT

The Brita® Pacifica Pitcher with LONGLAST® Filter reduces the following impurities that may be in your tap water:

Heavy Metals	Lead, Mercury, Cadmium
Taste and Odor	Chlorine
Particulates	Particulate I
Pharmaceuticals	Estrone, Ibuprofen, Naproxen
Industrial Chemicals	Bisphenol A (BPA), Nonyl Phenol
Industrial Pollutants	Asbestos, Benzene

EASY SETUP

With quick setup, you can start using your Brita® today!

WASH YOUR HANDS BEFORE UNWRAPPING THE FILTER. DISCARD FIRST 3 PITCHERS OF WATER TO FLUSH OUT SYSTEM.



See User's Guide for detailed instructions. No presoak or rinse required! For best results, store the Brita® Pitcher in your refrigerator or out of direct sunlight.

GET MORE WITH BRITA®

Join now to receive custom filter replacement reminders, see the latest news and offers, earn points and claim rewards. Visit [brita.com/register](http://brita.com/register).

FILTER REPLACEMENT IS ESSENTIAL FOR PRODUCT TO PERFORM AS REPRESENTED.

REPLACE FILTER EVERY 120 GALLONS (ABOUT 6 MONTHS FOR THE AVERAGE FAMILY).

ES IMPORTANTE CAMBIAR LOS FILTROS PARA QUE EL PRODUCTO FUNCIONE SEGUN LO INDICADO.

CAMBIE EL FILTRO DESPUES DE CADA 120 GALONES (ALREDEDOR DE 6 MESES PARA LA FAMILIA PROMEDIO).

Pacifica Pitcher (model...)  
LONGLAST® Filter  
has been tested  
the WQA against  
standards 42, 53 and 401  
of the claims.  
Performance Data Sheet.



# EXHIBIT L

Lead Service Line Replacement Close Out  
Letter



[DATE]

Dear Customer:

Our records show that your service line has been replaced in the last three to six months. As detailed in the Customer Lead/Galvanized Service Line Replacement License Agreement, the Company has dedicated the newly installed customer-owned portion of the service line back to you and you are responsible for that service line as of the date of completion of the installation. Your warranty on the workmanship and materials of the newly installed Customer-side service line and restoration of the surfaces is for 24 months from the date the replacement was completed.

**If you would like Aqua to sample the water at your premise, please contact Aqua at 610.645.4272. Aqua will provide sampling bottles and instructions for taking the samples as well as contact information for Aqua to arrange retrieval of the samples.**

Lead in drinking water is primarily from materials and components associated with service lines and home plumbing in older homes. Aqua is responsible for providing high-quality drinking water to your home but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by running your water for a few minutes or until it becomes cold before using it for drinking or cooking.

Call me at 610.645.4234 if you have any questions.

Sincerely,

Ann Dreyer  
Supervisor, Water Quality Services

# EXHIBIT M

5<sup>th</sup> Liter Sampling Instructions

**Aqua Pennsylvania**  
**Sampling Instructions for Special Lead Analysis**  
**For homes that had their Lead or Galvanized Service Line**  
**Replaced**

**Thank you for agreeing to collect samples following your lead/galvanized service line replacement. We recognize these instructions can be confusing. If you have any questions about the sampling protocol, please call us at 610.645.4272.**

**Please complete the back of these instructions with information on your home and when you collected the samples.**

**Sample Bottles** – Five 1 Liter plastic bottles will be dropped off from Aqua Pennsylvania’s Bryn Mawr Lab. These bottles are specifically designed for lead and copper analyses.

**Sample Location** – Please sample from a kitchen or bathroom cold-water faucet. The water going to that faucet should not have any treatment such as a filter or a water softener. If you do have a treatment system, note that on the form. Each of the 5 bottles must be collected from the same faucet.

**Sampling Procedure** – Do not use any water in your house for a minimum of six (6) hours prior to sampling. We recommend sampling either early mornings or evenings upon returning home. Be sure to use a kitchen or bathroom cold water tap that has been used for drinking water consumption in the past few days. Do not intentionally flush the water line before the start of the 6-hour period. Do not remove the aerator prior to sampling.

A series of five samples will be collected. We suggest that you line up the bottles by number (1 through 5) and remove the caps.

**Sample #1 (first draw):** Place the opened sample bottle below the faucet and open the cold water tap as you would to fill a glass of water. Fill the sample bottle to the line marked “1000-ml” **without allowing any water to run into the sink** and keep running the water.

After sample # 1 has been filled, quickly place bottle # 2 under the faucet. Fill each bottle in order (1 through 5) while the water continues to flow from the faucet. After each of the 5 bottles has been filled, replace the caps, tighten the caps, and place the bottles back in the bags.

If any plumbing repairs or replacements have been done in the home within the last three years, please note this on the form.

After the samples have been collected, please call 610.645.4272 Monday through Friday so that a driver can be notified to pick up samples. If you are leaving a message on our voicemail, please leave your name, address, and number where you can be reached. Place samples bottles outside the front door for pick-up (if it is more appropriate to leave somewhere other than front door, please specify that when calling).

**Results / Questions** - The results from your samples and information about lead will be provided to you as soon as practical but no later than 30 days. However, if elevated lead levels are found, prompt notification will be provided within two working days after results are made available. Call 610.645.4272 if you have any questions regarding these instructions.

**In order to process the samples, it is important that the resident complete this form and return with the 5 bottles.**

**Do you have a water softener or treatment system? Y / N**

**If so, was your softener or treatment bypassed when you took the samples? Y / N**

**Have you had any plumbing repairs or replacement in the last 3 years? Y/N If Yes, Explain:**

Sample Location and faucet (i.e., kitchen sink) \_\_\_\_\_

Water was last used:      Time:\_\_\_\_\_      Date:\_\_\_\_\_

Series of five water samples:

- Sample #1 was collected:      Time:\_\_\_\_\_      Date:\_\_\_\_\_
- Sample #5 was collected:      Time:\_\_\_\_\_      Date:\_\_\_\_\_

I have read the instructions and have taken the 5 tap samples in accordance with these instructions.

\_\_\_\_\_  
Signature

Date:\_\_\_\_\_

**Name:**

**Phone number:**

**Address:**

**Mailing Address (if different):**

# EXHIBIT N

5<sup>th</sup> Liter Sample Results Letter



DATE

Name  
Address

Dear [NAME] :

Below are the lead results for the water samples you collected from your property, following the 5<sup>th</sup> Liter sampling protocol instructions provided to you, on DATE.

	<i>1<sup>st</sup> Liter</i>	<i>2<sup>nd</sup> Liter</i>	<i>3<sup>rd</sup> Liter</i>	<i>4<sup>th</sup> Liter</i>	<i>5<sup>th</sup> Liter</i>
<b>LEAD RESULT</b>	ug/L	ug/L	ug/L	ug/L	ug/L

**ug/L = Micrograms per Liter or parts per billion**  
**N.D. = Not Detected**

The “Action Level” for lead in drinking water is 15 ug/L.

Lead in drinking water is primarily from materials and components associated with service lines and home plumbing in older homes. Aqua is responsible for providing high-quality drinking water but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for a period of time it takes to bring in fresh water before using it for drinking or cooking.

The water supplied to this area meets all the National Primary Drinking Water Standards.

I have included an additional fact sheet on lead in drinking water for your information. Call me at 610.645.4234 if you have any questions.

Sincerely,

Ann Dreyer  
Supervisor, Water Quality Services

# EXHIBIT O

Customer Refusal Letter



[DATE]

Dear Customer:

Our records show that your service line is lead or galvanized requiring replacement. Aqua has attempted to contact you to replace your lead or galvanized service line. Aqua has either received no response from you or you have refused to allow Aqua to replace your lead or galvanized service line.

Under the Pennsylvania Public Utility Commission's ("PUC") regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line or allow the continued use of a partial lead or galvanized service line (see 52 Pa. Code § 65.62). In accordance with PUC regulations Aqua is required to terminate service to your premise.

To avoid termination of service, please contact Aqua's Water Quality Department at 610.645.4234 to set up an appointment and receive further information to replace your lead or galvanized service line.

Sincerely,

Michael Fili, Vice President  
Capital Planning, Design & Construction  
Aqua Pennsylvania, Inc.

Attachments: Lead Fact Sheet  
Aqua Lead Service Line Replacement Program Information Sheet



# Aqua Wants Our Customers to Be Informed\*

Here's what you should know about lead and drinking water.

Lead is not typically found in the streams, reservoirs or wells that serve as water supplies or in the main water lines that carry water from treatment plants to homes. Yet, the chemical properties of water can cause lead and other metals to leach into drinking water. The main source of lead in drinking water is from lead service lines (the pipes that deliver water from water mains in the street and into homes) and from typical household plumbing (lead solder and brass fixtures) that contains lead. Households that have, or suspect having, lead service lines or lead in their household plumbing are strongly encouraged to replace them. The use of lead in solder was prohibited after 1986, so buildings constructed after then should not have contained lead in the solder.

## How Aqua protects its customers:

Water utilities, including Aqua, treat drinking water to reduce the chance for metals to leach into the water. Aqua conducts required testing for drinking water contaminants, including lead and copper, to ensure compliance with state and federal drinking water standards. Aqua tests the water at our treatment plants, and also schedules customer tap sampling and tests for lead in potential high-risk areas, to comply with the U.S. Environmental Protection Agency's (EPA) lead and copper rule.

You can always view your community's test results. They are summarized in our annual water quality reports, which are produced for every water system we own and operate.

## Lead Service Line Replacement Program:

Aqua can now assist customers with replacing the customer/property owner's portion of the service line if it is made of lead. Aqua's new program will allow us to work with customers, either during a main replacement project or by customer request, to replace the customer/property owner's portion of the service line if it is lead and dedicate the service line back to the customer/property owner at no direct cost to the customer/property owner.

Visit our website at <https://www.aquaamerica.com/our-states/pennsylvania/leadservicelines.aspx> for more information.



Call us at 877.987.2782 for more information.



You can find your community's water quality report at [AquaAmerica.com](https://www.aquaamerica.com).

More helpful information on the back





## If you are a residential customer:

You should know that there are parts of the service line bringing water to your home that are Aqua's property (the pipe that goes from our water main in the street to your curb) and parts of the service line that are the property owner's (the pipe that goes from your curb to your home). When we encounter lead service lines during our maintenance and construction activities, we will seek to identify the material type of both portions (Aqua's and the property owner's) of the service line. If we find lead on Aqua's side only, Aqua will replace its portion of the service line. If we find lead on the customer/property owner's side, we will work with you to replace the customer/property owner portion.

If you have concerns regarding your internal plumbing, we recommend that you have a licensed plumber check the pipes that are your property. This is important to know, because household plumbing can also be a source of lead in tap water. See the section below on "what you can do" for minimizing your risk if this happens.

**Aqua suggests that you call us at 877.987.2782 for more information. We'll quickly put you in touch with one of our water quality experts.**



## If you are a school or day care center:

You should know that the EPA has established more stringent sampling procedures for schools and day care centers. Because children often drink from fountains and faucets at school without flushing the water first, and because they are at higher risk of health effects due to exposure, for their protection, sampling is done differently at schools and day care centers.

**Aqua suggests that you call the EPA's safe drinking water hotline at 800.426.4791 or email them using this URL: <https://www.epa.gov/lead/forms/lead-hotline-national-lead-information-center>. Specific information regarding schools can be found on EPA's website at <https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water>. It's important for any testing you do to be conducted using EPA protocols, so that the results are meaningful.**

## The health effects of lead:

Lead can cause serious health problems if too much enters your body from drinking water or other sources. It can cause damage to the brain and kidneys and can interfere with the production of red blood cells that carry oxygen to all parts of the body. The greatest risk of lead exposure is to infants, young children and pregnant women.

If you are concerned about lead exposure:

- Contact your local health department or healthcare provider to find out how you can get your child tested for lead.
- Visit the EPA at [EPA.gov/lead](https://www.epa.gov/lead) for more information on the health effects of lead or reducing lead exposure in your home.
- Call Aqua at 877.987.2782 for information about testing your water.

## What you can do:

If your home's water shows elevated levels of lead, or if you are concerned about the potential of lead in your water, below are ways you can minimize your exposure.

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Don't boil water to reduce lead. Lead dissolves more easily into hot water and boiling will concentrate the lead. Boiling water won't reduce lead.
- If you buy a water filter for lead removal, make sure it's approved to reduce lead. Contact NSF International, [www.NSF.org](http://www.NSF.org).

# Customer Lead Service Line Replacement Program Information Sheet



## **BACKGROUND – AQUA CUSTOMER LEAD SERVICE LINE REPLACEMENT PROGRAM**

Lead is a naturally occurring metal that can cause a variety of adverse health effects. While the most common sources of lead exposure are soil, paint chips and dust, drinking water is another route of lead exposure, primarily as a result of corrosion of lead pipes and plumbing materials. The Pennsylvania General Assembly determined it is in the public interest for water utilities to assist customers in the replacement of customer-owned lead, or galvanized requiring replacement (“galvanized”), service lines throughout Pennsylvania.

The service line that provides water service to a property is made up of two parts: a Company-owned portion (which connects from the Company’s main to the curb line) and a customer-owned portion (which connects from the curb line to a customer’s structure). Customers, or property owners if the customer is not the property owner (“Customer”) are required to maintain and repair the Customer-owned portion of the service line.

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”) now has been granted the authority to assist Customers in replacing the Customer-owned portion of the service line if that service line is identified as lead or galvanized.

## **CUSTOMER-OWNED LEAD SERVICE LINE REPLACEMENT PROGRAM**

Under the Customer Lead Service Line Replacement Program (“Replacement Program”), Aqua will identify customer-owned service lines that are lead or galvanized, enter into an agreement with the Customer to replace the Customer-owned portion of the service line and restore the Customer’s property at no direct cost to the customer, dedicate the newly installed customer portion of the service line back to the Customer, and provide a warranty on the work completed to replace the Customer-owned lead or galvanized service line.

Aqua’s Replacement Program is made up of two parts: (1) replacements in connection with a main replacement project, and (2) replacements per Customer request not associated with a main replacement project.

### **Cap on Replacements Per Year**

Aqua can perform up to 1,500 customer-owned lead or galvanized service line replacements per year.

### **Customer Agreement and Replacement**

In order for Aqua to complete a replacement, the Customer must enter into an agreement with Aqua to replace the Customer-owned lead or galvanized service line. Aqua cannot replace the Customer portion of a lead or galvanized service line without first entering into an agreement. The agreement provides that the Customer will give access to Aqua, or Aqua’s contractor, to complete the

replacement. Following replacement, Aqua, or Aqua’s contractor, will restore the property as reasonably as practicable to its former condition prior to the replacement of the Customer-owned lead or galvanized service line.

### **Dedication of Newly Installed Customer Portion of Service Line and Warranty**

After the new Customer-owned portion of the service line is installed, the Customer-owned portion will be dedicated to the Customer and ownership and responsibility for repair and maintenance of the Customer-owned portion of the service line will remain with the Customer as was the case prior to the replacement. A two-year warranty on the workmanship and materials of the installation and the restoration of surfaces shall be provided.

### **Coordination of Replacements**

Aqua will strive to group customer requested replacements within its operating divisions to create efficiencies. However, Aqua may replace a Customer’s lead or galvanized service line if projects cannot be grouped together in its discretion.

### **Filters, Sampling and Testing**

Upon identification of a customer lead or galvanized service line, Aqua will provide a National Sanitation Foundation approved water filter (pitcher or tap filter) and six months of replacement filters. At approximately 3-6 months after replacement is completed, Aqua will offer water sampling materials to Customers or residents, and if Customer or resident wants to have samples taken, Aqua will collect, test, and provide the results from those samples.

### **Reimbursement for Customers that Have Already Replaced a Lead or Galvanized Service Line**

As part of Aqua’s Replacement Program, Aqua will provide a reimbursement to those Customers that have replaced their Customer-owned lead or galvanized service line within certain time periods subject to certain requirements. Reimbursement will occur for those Customers that provide documentation sufficient, in Aqua’s sole discretion, to verify that the Customer replaced the Customer-owned lead or galvanized service line within one year before or after the start of a planned lead service line replacement project main replacement and as long as the Customer is within one mile of the main replacement project or focused replacement area. Customers will be eligible for reimbursement up to 125% of the average cost of Aqua’s lead and galvanized replacements. Average cost used to determine reimbursement amounts during a calendar year will be based on Aqua’s prior calendar year average costs for lead and galvanized service line replacements. Examples of documentation required by Aqua for a Customer to be eligible for reimbursement include, but are not limited to, detailed estimates from a licensed plumber and paid invoices or statements. A verified statement may also be submitted from the licensed plumber.

### **Partial Replacements Prohibited**

Under the Pennsylvania Public Utility Commission’s (“PUC”) regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line. If a Customer causes a partial replacement, by replacing the Customer portion of a lead or galvanized service line without notifying Aqua, Aqua is

required to terminate service until a full replacement of the lead or galvanized service line can be completed.

In addition, any Customer that refuses to allow Aqua (or its contractor) to replace the lead or galvanized service line, or refuses to employ its own licensed plumber to replace the lead or galvanized service line, will result in termination of service to the property until the entire lead or galvanized service line is replaced.

Aqua may, in its sole discretion, use Step In Rights as described in Aqua's tariff to perform a replacement if the customer or occupier of the property is not the owner, Aqua has attempted to contact the owner with an offer to replace the Customer lead service line and has not received a response, and such replacement is in the public interest to avoid termination of service to a property where the customer is not the owner of the property.

## **CONCLUSION**

Aqua recognizes the importance of removing lead from water systems across Pennsylvania both on Aqua owned and Customer-owned assets. Aqua looks forward to working with Customers to achieve this goal.

# EXHIBIT P

Public Education Materials – 40 C.F.R. §  
141.85(a)



## IMPORTANT INFORMATION ABOUT LEAD IN YOUR DRINKING WATER<sup>1</sup>

[INSERT NAME OF WATER SYSTEM] found elevated levels of lead in drinking water in some homes/buildings. Lead can cause serious health problems, especially for pregnant women and young children. Please read this information closely to see what you can do to reduce lead in your drinking water.

### Health Effects of Lead

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

### Sources of Lead

Lead is a common metal found in the environment. Drinking water is one possible source of lead exposure. Lead Service lines, brass faucets, fittings, and valves, including those advertised as “low lead” or “lead-free,” may contribute lead to drinking water. Regulations previously allowed “low lead” fixtures containing up to 8 percent lead. Current regulations only allow “lead-free” fixtures with up to 0.25 percent lead. When water is in contact with pipes, service lines, or plumbing that contains lead for several hours, the lead may enter drinking water. Homes built before 1990 are more likely to have lead pipes or lead solder.

The main sources of lead exposure are lead-based paint, lead-contaminated dust or soil, and some plumbing materials. In addition, lead can be found in certain types of pottery, pewter, brass fixtures, food, and cosmetics. Other sources include exposure in the workplace and exposure from certain hobbies (lead can be carried on clothing or shoes). Lead is found in some toys, some playground equipment, and some children’s metal jewelry.

### Steps You Can Take to Reduce Your Exposure to Lead in Your Water

- **Run your tap to flush out lead.** If your water hasn’t been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **Do not boil water to remove lead.** Boiling water will not reduce lead.
- **Consider alternative sources or treatment of water.** You may want to consider purchasing bottled water or a water filter. Read the package to be sure the filter is

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approved to reduce lead or contact NSF International ([www.nsf.org](http://www.nsf.org)) for information on performance standards for water filters. Be sure to maintain and replace a filter device in accordance with the manufacturer's instructions to protect water quality.

- **Test your water for lead.** Call us at 1-877-987-2782 to find out how to get your water tested for lead.
- **Get your child's blood tested.** Contact your local health department or healthcare provider to find out how you can get your child tested for lead if you are concerned about exposure.

### **What happened? What is being done?**

[Notice Specific Information: Explain why there are elevated levels of lead in the system's drinking water (if known) and what the water system is doing to reduce the lead levels in homes/buildings in this area.]

### **Aqua's lead and galvanized service line replacement program**

At Aqua, we are implementing a program that involves replacing all lead and galvanized service lines in our drinking water systems at no direct cost to our customers. Information about our lead and galvanized service line replacement program is attached. For more information, call us at 1-877-987-2782, or visit our website at <https://www.aquawater.com/about-water/water-quality/lead.php>. For more information on reducing lead exposure around your home/building and the health effects of lead, visit EPA's website at <http://www.epa.gov/lead> or contact your health care provider.

# EXHIBIT Q

Lead and Copper Monitoring Results – 40  
C.F.R. § 141.85(d)



[DATE]

Dear Customer:

We would like to thank you for your participation in the lead tap monitoring program. Below are the results of the water samples you collected from your property at **ADDRESS** on **DATE**, following the sampling instructions provided to you.

	Immediate Sample	USEPA Action Level
<b>Lead</b>	ug/L	15 ug/L
<b>Copper</b>	mg/L	1.3 mg/L

ug/L = micrograms per liter or parts per billion  
mg/L = milligrams per liter or parts per million  
ND = Not detected

- Lead was **NOT DETECTED** at this sample location.
- Lead was detected **BELOW** the action level of 15 ug/L (ppb).
- Lead was detected **ABOVE** the action level of 15 ug/L (ppb).

Under the authority of the Safe Drinking Water Act, the EPA set the action level for lead in drinking water at 15 ug/L. The action level is the concentration of a contaminant which, if exceeded, triggers treatment or other requirements that Aqua must follow. This means Aqua must ensure that water from the customer’s tap does not exceed this level in at least 90 percent of the homes sampled (90th percentile value). Because lead may pose serious health risks, the EPA set a Maximum Contaminant Level Goal (MCLG) of zero for lead. The MCLG is the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

Lead is more likely to accumulate when water is in contact with a lead source for longer periods of time. There are steps you can take to minimize exposure to lead in drinking water:<sup>1</sup>

- **Run your tap to flush out lead.** If your water hasn’t been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.

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- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **Do not boil water to remove lead.** Boiling water will not reduce lead.
- **Consider alternative sources or treatment of water.** You may want to consider purchasing bottled water or a water filter. Read the package to be sure the filter is approved to reduce lead or contact NSF International ([www.nsf.org](http://www.nsf.org)) for information on performance standards for water filters. Be sure to maintain and replace a filter device in accordance with the manufacturer's instructions to protect water quality.
- **Test your water for lead.** Call us at 1-877-987-2782 to find out how to get your water tested for lead.
- **Get your child's blood tested.** Contact your local health department or healthcare provider to find out how you can get your child tested for lead if you are concerned about exposure.

If you need more information concerning this result or have any questions, please contact us at 1-877-987-2782.

Sincerely,

Aqua Pennsylvania

# EXHIBIT R

Notification of Known Lead Service Line –  
40 C.F.R. § 141.85(e)(3)(i)



[DATE]

Dear Customer:

Aqua Pennsylvania (Aqua) is implementing a program that involves replacing all lead and galvanized service lines in our drinking water systems at no direct cost to our customers. Aqua supplies water to your home through a service line that runs from the water main into your home. Aqua owns the service line from the water main to the curb. You own the service line that runs from the curb into your home.

**Our records indicate that the water service line serving your home contains lead.** We will be contacting you to verify the service line material and to schedule the replacement of your service line. We will replace all portions of the service line that are lead or galvanized. Information about our lead and galvanized service line replacement program is attached. Note that if you proceed with replacement of your service line using your own plumber, Aqua is required to replace the company-owned service line, if lead or galvanized, upon your notification.

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

Lead is more likely to accumulate when water is in contact with a lead source for longer periods of time. There are steps you can take to minimize exposure to lead in drinking water:<sup>1</sup>

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **Do not boil water to remove lead.** Boiling water will not reduce lead.
- **Consider alternative sources or treatment of water.** You may want to consider purchasing bottled water or a water filter. Read the package to be sure the filter is approved to reduce lead or contact NSF International ([www.nsf.org](http://www.nsf.org)) for information on performance standards for water filters. Be sure to maintain and replace a filter device in accordance with the manufacturer's instructions to protect water quality.
- **Test your water for lead.** Call us at 1-877-987-2782 to find out how to get your water tested for lead.

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- **Get your child's blood tested.** Contact your local health department or healthcare provider to find out how you can get your child tested for lead if you are concerned about exposure.

You will be receiving this letter annually until your lead service line has been replaced. If you have any questions, please contact us at 1-877-987-2782.

Sincerely,

Aqua Pennsylvania

Attachment: Customer Lead Service Line Replacement Program Information Sheet

# Customer Lead Service Line Replacement Program Information Sheet



## **BACKGROUND – AQUA CUSTOMER LEAD SERVICE LINE REPLACEMENT PROGRAM**

Lead is a naturally occurring metal that can cause a variety of adverse health effects. While the most common sources of lead exposure are soil, paint chips and dust, drinking water is another route of lead exposure, primarily as a result of corrosion of lead pipes and plumbing materials. The Pennsylvania General Assembly determined it is in the public interest for water utilities to assist customers in the replacement of customer-owned lead, or galvanized requiring replacement (“galvanized”), service lines throughout Pennsylvania.

The service line that provides water service to a property is made up of two parts: a Company-owned portion (which connects from the Company’s main to the curb line) and a customer-owned portion (which connects from the curb line to a customer’s structure). Customers, or property owners if the customer is not the property owner (“Customer”) are required to maintain and repair the Customer-owned portion of the service line.

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”) now has been granted the authority to assist Customers in replacing the Customer-owned portion of the service line if that service line is identified as lead or galvanized.

## **CUSTOMER-OWNED LEAD SERVICE LINE REPLACEMENT PROGRAM**

Under the Customer Lead Service Line Replacement Program (“Replacement Program”), Aqua will identify customer-owned service lines that are lead or galvanized, enter into an agreement with the Customer to replace the Customer-owned portion of the service line and restore the Customer’s property at no direct cost to the customer, dedicate the newly installed customer portion of the service line back to the Customer, and provide a warranty on the work completed to replace the Customer-owned lead or galvanized service line.

Aqua’s Replacement Program is made up of two parts: (1) replacements in connection with a main replacement project, and (2) replacements per Customer request not associated with a main replacement project.

### **Cap on Replacements Per Year**

Aqua can perform up to 1,500 customer-owned lead or galvanized service line replacements per year.

### **Customer Agreement and Replacement**

In order for Aqua to complete a replacement, the Customer must enter into an agreement with Aqua to replace the Customer-owned lead or galvanized service line. Aqua cannot replace the Customer portion of a lead or galvanized service line without first entering into an agreement. The agreement provides that the Customer will give access to Aqua, or Aqua’s contractor, to complete the

replacement. Following replacement, Aqua, or Aqua’s contractor, will restore the property as reasonably as practicable to its former condition prior to the replacement of the Customer-owned lead or galvanized service line.

### **Dedication of Newly Installed Customer Portion of Service Line and Warranty**

After the new Customer-owned portion of the service line is installed, the Customer-owned portion will be dedicated to the Customer and ownership and responsibility for repair and maintenance of the Customer-owned portion of the service line will remain with the Customer as was the case prior to the replacement. A two-year warranty on the workmanship and materials of the installation and the restoration of surfaces shall be provided.

### **Coordination of Replacements**

Aqua will strive to group customer requested replacements within its operating divisions to create efficiencies. However, Aqua may replace a Customer’s lead or galvanized service line if projects cannot be grouped together in its discretion.

### **Filters, Sampling and Testing**

Upon identification of a customer lead or galvanized service line, Aqua will provide a National Sanitation Foundation approved water filter (pitcher or tap filter) and six months of replacement filters. At approximately 3-6 months after replacement is completed, Aqua will offer water sampling materials to Customers or residents, and if Customer or resident wants to have samples taken, Aqua will collect, test, and provide the results from those samples.

### **Reimbursement for Customers that Have Already Replaced a Lead or Galvanized Service Line**

As part of Aqua’s Replacement Program, Aqua will provide a reimbursement to those Customers that have replaced their Customer-owned lead or galvanized service line within certain time periods subject to certain requirements. Reimbursement will occur for those Customers that provide documentation sufficient, in Aqua’s sole discretion, to verify that the Customer replaced the Customer-owned lead or galvanized service line within one year before or after the start of a planned lead service line replacement project main replacement and as long as the Customer is within one mile of the main replacement project or focused replacement area. Customers will be eligible for reimbursement up to 125% of the average cost of Aqua’s lead and galvanized replacements. Average cost used to determine reimbursement amounts during a calendar year will be based on Aqua’s prior calendar year average costs for lead and galvanized service line replacements. Examples of documentation required by Aqua for a Customer to be eligible for reimbursement include, but are not limited to, detailed estimates from a licensed plumber and paid invoices or statements. A verified statement may also be submitted from the licensed plumber.

### **Partial Replacements Prohibited**

Under the Pennsylvania Public Utility Commission’s (“PUC”) regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line. If a Customer causes a partial replacement, by replacing the Customer portion of a lead or galvanized service line without notifying Aqua, Aqua is

required to terminate service until a full replacement of the lead or galvanized service line can be completed.

In addition, any Customer that refuses to allow Aqua (or its contractor) to replace the lead or galvanized service line, or refuses to employ its own licensed plumber to replace the lead or galvanized service line, will result in termination of service to the property until the entire lead or galvanized service line is replaced.

Aqua may, in its sole discretion, use Step In Rights as described in Aqua's tariff to perform a replacement if the customer or occupier of the property is not the owner, Aqua has attempted to contact the owner with an offer to replace the Customer lead service line and has not received a response, and such replacement is in the public interest to avoid termination of service to a property where the customer is not the owner of the property.

## **CONCLUSION**

Aqua recognizes the importance of removing lead from water systems across Pennsylvania both on Aqua owned and Customer-owned assets. Aqua looks forward to working with Customers to achieve this goal.

# EXHIBIT S

Notification of Known GRR Service Line –  
40 C.F.R. § 141.85(e)(3)(ii)



[DATE]

Dear Customer:

Aqua Pennsylvania (Aqua) is implementing a program that involves replacing all lead and galvanized service lines in our drinking water systems at no direct cost to our customers. Aqua supplies water to your home through a service line that runs from the water main into your home. Aqua owns the service line from the water main to the curb. You own the service line that runs from the curb into your home.

**Our records indicate that the water service line serving your home is a galvanized pipe that requires replacement.** We will be contacting you to verify the service line material and to schedule the replacement of your service line. We will replace all portions of the service line that are lead or galvanized. Information about our lead and galvanized service line replacement program is attached. Note that if you proceed with replacement of your service line using your own plumber, Aqua is required to replace the company-owned service line, if lead or galvanized, upon your notification.

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

Lead is more likely to accumulate when water is in contact with a lead source for longer periods of time. There are steps you can take to minimize exposure to lead in drinking water:<sup>1</sup>

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **Do not boil water to remove lead.** Boiling water will not reduce lead.
- **Consider alternative sources or treatment of water.** You may want to consider purchasing bottled water or a water filter. Read the package to be sure the filter is approved to reduce lead or contact NSF International ([www.nsf.org](http://www.nsf.org)) for information on performance standards for water filters. Be sure to maintain and replace a filter device in accordance with the manufacturer's instructions to protect water quality.
- **Test your water for lead.** Call us at 1-877-987-2782 to find out how to get your water tested for lead.

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- **Get your child's blood tested.** Contact your local health department or healthcare provider to find out how you can get your child tested for lead if you are concerned about exposure.

You will be receiving this letter annually until your galvanized service line has been replaced. If you have any questions, please contact us at 1-877-987-2782.

Sincerely,

Aqua Pennsylvania

Attachment: Customer Lead Service Line Replacement Program Information Sheet

# Customer Lead Service Line Replacement Program Information Sheet



## **BACKGROUND – AQUA CUSTOMER LEAD SERVICE LINE REPLACEMENT PROGRAM**

Lead is a naturally occurring metal that can cause a variety of adverse health effects. While the most common sources of lead exposure are soil, paint chips and dust, drinking water is another route of lead exposure, primarily as a result of corrosion of lead pipes and plumbing materials. The Pennsylvania General Assembly determined it is in the public interest for water utilities to assist customers in the replacement of customer-owned lead, or galvanized requiring replacement (“galvanized”), service lines throughout Pennsylvania.

The service line that provides water service to a property is made up of two parts: a Company-owned portion (which connects from the Company’s main to the curb line) and a customer-owned portion (which connects from the curb line to a customer’s structure). Customers, or property owners if the customer is not the property owner (“Customer”) are required to maintain and repair the Customer-owned portion of the service line.

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”) now has been granted the authority to assist Customers in replacing the Customer-owned portion of the service line if that service line is identified as lead or galvanized.

## **CUSTOMER-OWNED LEAD SERVICE LINE REPLACEMENT PROGRAM**

Under the Customer Lead Service Line Replacement Program (“Replacement Program”), Aqua will identify customer-owned service lines that are lead or galvanized, enter into an agreement with the Customer to replace the Customer-owned portion of the service line and restore the Customer’s property at no direct cost to the customer, dedicate the newly installed customer portion of the service line back to the Customer, and provide a warranty on the work completed to replace the Customer-owned lead or galvanized service line.

Aqua’s Replacement Program is made up of two parts: (1) replacements in connection with a main replacement project, and (2) replacements per Customer request not associated with a main replacement project.

### **Cap on Replacements Per Year**

Aqua can perform up to 1,500 customer-owned lead or galvanized service line replacements per year.

### **Customer Agreement and Replacement**

In order for Aqua to complete a replacement, the Customer must enter into an agreement with Aqua to replace the Customer-owned lead or galvanized service line. Aqua cannot replace the Customer portion of a lead or galvanized service line without first entering into an agreement. The agreement provides that the Customer will give access to Aqua, or Aqua’s contractor, to complete the

replacement. Following replacement, Aqua, or Aqua’s contractor, will restore the property as reasonably as practicable to its former condition prior to the replacement of the Customer-owned lead or galvanized service line.

### **Dedication of Newly Installed Customer Portion of Service Line and Warranty**

After the new Customer-owned portion of the service line is installed, the Customer-owned portion will be dedicated to the Customer and ownership and responsibility for repair and maintenance of the Customer-owned portion of the service line will remain with the Customer as was the case prior to the replacement. A two-year warranty on the workmanship and materials of the installation and the restoration of surfaces shall be provided.

### **Coordination of Replacements**

Aqua will strive to group customer requested replacements within its operating divisions to create efficiencies. However, Aqua may replace a Customer’s lead or galvanized service line if projects cannot be grouped together in its discretion.

### **Filters, Sampling and Testing**

Upon identification of a customer lead or galvanized service line, Aqua will provide a National Sanitation Foundation approved water filter (pitcher or tap filter) and six months of replacement filters. At approximately 3-6 months after replacement is completed, Aqua will offer water sampling materials to Customers or residents, and if Customer or resident wants to have samples taken, Aqua will collect, test, and provide the results from those samples.

### **Reimbursement for Customers that Have Already Replaced a Lead or Galvanized Service Line**

As part of Aqua’s Replacement Program, Aqua will provide a reimbursement to those Customers that have replaced their Customer-owned lead or galvanized service line within certain time periods subject to certain requirements. Reimbursement will occur for those Customers that provide documentation sufficient, in Aqua’s sole discretion, to verify that the Customer replaced the Customer-owned lead or galvanized service line within one year before or after the start of a planned lead service line replacement project main replacement and as long as the Customer is within one mile of the main replacement project or focused replacement area. Customers will be eligible for reimbursement up to 125% of the average cost of Aqua’s lead and galvanized replacements. Average cost used to determine reimbursement amounts during a calendar year will be based on Aqua’s prior calendar year average costs for lead and galvanized service line replacements. Examples of documentation required by Aqua for a Customer to be eligible for reimbursement include, but are not limited to, detailed estimates from a licensed plumber and paid invoices or statements. A verified statement may also be submitted from the licensed plumber.

### **Partial Replacements Prohibited**

Under the Pennsylvania Public Utility Commission’s (“PUC”) regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line. If a Customer causes a partial replacement, by replacing the Customer portion of a lead or galvanized service line without notifying Aqua, Aqua is

required to terminate service until a full replacement of the lead or galvanized service line can be completed.

In addition, any Customer that refuses to allow Aqua (or its contractor) to replace the lead or galvanized service line, or refuses to employ its own licensed plumber to replace the lead or galvanized service line, will result in termination of service to the property until the entire lead or galvanized service line is replaced.

Aqua may, in its sole discretion, use Step In Rights as described in Aqua's tariff to perform a replacement if the customer or occupier of the property is not the owner, Aqua has attempted to contact the owner with an offer to replace the Customer lead service line and has not received a response, and such replacement is in the public interest to avoid termination of service to a property where the customer is not the owner of the property.

## **CONCLUSION**

Aqua recognizes the importance of removing lead from water systems across Pennsylvania both on Aqua owned and Customer-owned assets. Aqua looks forward to working with Customers to achieve this goal.

# EXHIBIT T

Notification of Unknown Service Line  
Material – 40 C.F.R. § 141.85(e)(3)(iii)



[DATE]

Dear Customer:

Aqua Pennsylvania (Aqua) is implementing a program that involves replacing all lead and galvanized service lines in our drinking water systems at no direct cost to our customers. Aqua supplies water to your home through a service line that runs from the water main into your home. Aqua owns the service line from the water main to the curb. You own the service line that runs from the curb into your home.

**Our records indicate that the water service line material serving your home is unknown but may be lead or galvanized.** You can help us by identifying the material of the service line that provides water to your home. If possible, please review the **Identify Your Service Line Material** video located at



<https://www.aquawater.com/about-water/water-quality/lead.php> or by using the QR code to the right to help with your determination. You have two options to respond:

- Fill out the **Customer Lead and Copper Survey** attached and return it by mail using the postage prepaid return envelope included with this letter.
- Complete the online questionnaire available with the video. The online questionnaire is the preferred option since it will allow you to provide photos of your service line.

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

Lead is more likely to accumulate when water is in contact with a lead source for longer periods of time. There are steps you can take to minimize exposure to lead in drinking water:<sup>1</sup>

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **Do not boil water to remove lead.** Boiling water will not reduce lead.
- **Consider alternative sources or treatment of water.** You may want to consider purchasing bottled water or a water filter. Read the package to be sure the filter is approved to reduce lead or contact NSF International ([www.nsf.org](http://www.nsf.org)) for information on

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performance standards for water filters. Be sure to maintain and replace a filter device in accordance with the manufacturer's instructions to protect water quality.

- **Test your water for lead.** Call us at 1-877-987-2782 to find out how to get your water tested for lead.
- **Get your child's blood tested.** Contact your local health department or healthcare provider to find out how you can get your child tested for lead if you are concerned about exposure.

You will be receiving this letter annually until you have notified us of your service line material. If you have any questions, please contact us at 1-877-987-2782.

Sincerely,

Aqua Pennsylvania

Attachment: Customer Lead and Copper Survey



## Customer Lead and Copper Survey

To comply with Pennsylvania Public Utility Commission (PAPUC), Pennsylvania Department of Environmental Protection (PADEP) and Environmental Protection Agency (EPA) regulations, Aqua is compiling a database of the materials used in our customer’s service lines. Please take a few minutes to complete this survey. If you have questions or would like assistance, please call [PHONE NUMBER] between the hours of 8am-5pm to schedule an appointment. Please state that you are calling about the Aqua [SPECIFIC DIVISION] Water Survey.

**To save time we provide a QR Code to complete this survey online:**

*(If you choose to complete this online, you may recycle these materials.)*



Name of person filling out the survey: \_\_\_\_\_

Phone number should we have questions: \_\_\_\_\_

1. Home Address: \_\_\_\_\_
2. Year home built: \_\_\_\_\_
3. If known, what type of material is the service line coming into your home? Please provide a picture for verification via email to [EMAIL ADDRESS] or mail back with this survey. See included pipe identification instructions.

\_\_\_Lead    \_\_\_Copper    \_\_\_Plastic or PVC or PEX    \_\_\_Galvanized

**\*If other or unknown please CALL [PHONE NUMBER] to verify.**

### Water Pipe and Service Line Material Identification

	Lead	Galvanized Iron	Copper
<b>Outer Appearance</b>	Dull gray, bendable; Often curves between wall/floor and valve	Dark gray or black; Straight rigid pipe	Brown; Can have green corrosion spots
<b>Threads at connections</b>	None	Yes	None
<b>Scratch Test (coin or key)</b>	Shiny silver	Hard to scratch, remains gray	Copper, like a penny
<b>Magnet Test</b>	Does not stick	Magnet WILL stick	Does not stick

Please return completed survey in the enclosed self-address envelope to [ADDRESS]

# How to Identify Water Service Line and Water Pipe Materials in Your Home

## Water Service Line and Pipe Material Identification Instructions

### Step 1

Locate the water service line entering your home which is usually located in the basement or a crawlspace. The service line is typically just before the whole-house shut-off valve which should be near where the water service enters the home.

### Step 2

Use the identification sheet below to help identify your service line material (copper, lead, galvanized or plastic pipe).



- **Lead** – pipe is NOT threaded, it is soft, easily scraped, dull silver-gray in color, and a magnet does NOT stick to the pipe. Use flat edge of a screwdriver (or similar tool) to scrape the pipe. If the scraped area is shiny and silver, the line is lead.
- **Copper** – the color of a penny and not threaded
- **Galvanized** – pipe is threaded, dull silver-gray in color, and magnet will typically stick to the pipe
- **Plastic** – white, blue, or black rigid plastic pipe

### Follow these steps:

#### You will need:

- Key or a coin
- Strong refrigerator magnet

1. Find the water meter in your basement. Look at the pipe that comes through the outside wall of your home and connects to your meter.
2. Carefully scratch the pipe (like you would a lottery ticket) with a key or a coin. Do not use a knife or other sharp tool. Take care not to make a hole in the pipe. If the scratch turns a shiny silver color, it could be lead or steel. **NOTE: If pipe is painted, use sandpaper to expose the metal first.**
3. Place the magnet on the pipe. If a magnet sticks, it is a steel pipe.

#### Other ways you can check for lead:

- Purchase a lead test kit at a hardware or home improvement store. These kits test what the pipe is made from—not the water inside. Look for an EPA recognized kit.
- A [licensed and insured plumber](#) can inspect your pipes and other plumbing for lead or steel. Replacing an older brass faucet or valve might reduce the lead in water.



**Thank you for taking time out of your busy schedule to complete and return this survey. The data collected will help us to provide an accurate inventory of water service line materials in your community to eliminate lead from service lines.**

Please return completed survey in the enclosed self-address envelope to [ADDRESS]

# EXHIBIT U

Notification of a Disturbance to a Lead,  
GRR, or Lead Status Unknown Service Line  
that Results in the Service Line Being Shut  
Off or Bypassed – 40 C.F.R. § 141.85(f)(1)



¡Favor de no consumir el agua sin antes comunicarse con nuestro Department de Servicio al Cliente al 877.987.2782!


## An Important Health Notice From Aqua\*



PLEASE READ THIS BEFORE USING YOUR WATER!

Aqua Pennsylvania is completing work on our water system that requires shutting off or bypassing your service line that may cause a disturbance to your service line. Our records indicate that your water service line is lead, galvanized requiring replacement, or lead status unknown. Due to the nature of your service line material, we must inform you that disturbing a service line that contains lead could result in elevated lead levels in your drinking water.

**Before using your water, please review and follow the flushing instructions below to minimize your exposure to lead and to remove particulate lead that may have been stirred up during the disturbance.**

-  If possible, remove faucet aerators from all water faucets in the home.
- Beginning in the lowest level of the home, fully open the cold water faucets throughout the home.
- Let the water run for at least 30 minutes at the last faucet you opened (which was on your top floor).
- Turn off each faucet starting with the faucets in the highest level of the home. Be sure to run water in bathtubs and showers as well as faucets.
- Clean and reinstall any aerators you might have removed in Step 1.
- Do not consume tap water, open hot water faucets, or use icemaker or filtered water dispenser until after flushing is complete.

\*Based on the American Water Works Association-recommended safety procedures (awwa.org).

Please visit Aqua's website for more information concerning Aqua's Replacement program at <https://www.aquawater.com/about-water/water-quality/lead.php>. Thank you for letting Aqua serve you! For questions and concerns please contact Aqua customer service at 877.987.2782.

*\*This information sheet contains regulatorily required or recommended language and nothing herein is intended as, nor should be construed as, a promise of or a contract for payment or reimbursement of expenses incurred for any action you take on account of this information sheet.*

# EXHIBIT V

Notification of a Disturbance to a Lead,  
GRR, or Lead Status Unknown Service Line  
From the Replacement of an Inline Water  
Meter, a Water Meter Setter, or Gooseneck,  
Pigtail, or Connector – 40 C.F.R. §  
141.85(f)(2)



An Essential Utilities Company

¡Favor de no consumir el agua sin antes comunicarse con nuestro Department de Servicio al Cliente al 877.987.2782!

## An Important Health Notice From Aqua\*



PLEASE READ THIS BEFORE USING YOUR WATER!

Aqua Pennsylvania is completing work on our water system including replacing an inline water meter, a water meter setter, or gooseneck, pigtail, or connector that may cause a disturbance to your service line. Our records indicate that your water service line is lead, galvanized requiring replacement, or lead status unknown. Due to the nature of your service line material, we must inform you that disturbing a service line that contains lead could result in elevated lead levels in your drinking water.

**Before using your water, please review and follow the flushing instructions below to minimize your exposure to lead and to remove particulate lead that may have been stirred up during the disturbance. Please use the provided pitcher filter prior to using water for drinking and cooking. Please refer to the instructions provided with the pitcher filter.**

1



If possible, remove faucet aerators from all water faucets in the home.

4

Turn off each faucet starting with the faucets in the highest level of the home. Be sure to run water in bathtubs and showers as well as faucets.

2

Beginning in the lowest level of the home, fully open the cold water faucets throughout the home.

5

Clean and reinstall any aerators you might have removed in Step 1.

3

Let the water run for at least 30 minutes at the last faucet you opened (which was on your top floor).

6

Do not consume tap water, open hot water faucets, or use icemaker or filtered water dispenser until after flushing is complete.

\*Based on the American Water Works Association-recommended safety procedures (awwa.org).

Please visit Aqua's website for more information concerning Aqua's Replacement program at <https://www.aquawater.com/about-water/water-quality/lead.php>. Thank you for letting Aqua serve you! For questions and concerns please contact Aqua customer service at 877.987.2782.

[INSERT NAME OF WATER SYSTEM] found elevated levels of lead in drinking water in some homes/buildings. Lead can cause serious health problems, especially for pregnant women and young children. Please read this information closely to see what you can do to reduce lead in your drinking water.

### **Health Effects of Lead**

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

### **Sources of Lead**

Lead is a common metal found in the environment. Drinking water is one possible source of lead exposure. Lead Service lines, brass faucets, fittings, and valves, including those advertised as “low lead” or “lead-free,” may contribute lead to drinking water. Regulations previously allowed “low lead” fixtures containing up to 8 percent lead. Current regulations only allow “lead-free” fixtures with up to 0.25 percent lead. When water is in contact with pipes, service lines, or plumbing that contains lead for several hours, the lead may enter drinking water. Homes built before 1990 are more likely to have lead pipes or lead solder.

The main sources of lead exposure are lead-based paint, lead-contaminated dust or soil, and some plumbing materials. In addition, lead can be found in certain types of pottery, pewter, brass fixtures, food, and cosmetics. Other sources include exposure in the workplace and exposure from certain hobbies (lead can be carried on clothing or shoes). Lead is found in some toys, some playground equipment, and some children’s metal jewelry.

### **Steps You Can Take to Reduce Your Exposure to Lead in Your Water**

- **Run your tap to flush out lead.** If your water hasn’t been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **Do not boil water to remove lead.** Boiling water will not reduce lead.
- **Consider alternative sources or treatment of water.** You may want to consider purchasing bottled water or a water filter. Read the package to be sure the filter is approved to reduce lead or contact NSF International ([www.nsf.org](http://www.nsf.org)) for information on performance standards for water filters. Be sure to maintain and replace a filter device in accordance with the manufacturer’s instructions to protect water quality.
- **Test your water for lead.** Call us at 1-877-987-2782 to find out how to get your water tested for lead.

- **Get your child's blood tested.** Contact your local health department or healthcare provider to find out how you can get your child tested for lead if you are concerned about exposure.

**What happened? What is being done?**

[Notice Specific Information: Explain why there are elevated levels of lead in the system's drinking water (if known) and what the water system is doing to reduce the lead levels in homes/buildings in this area.]

**Aqua's lead and galvanized service line replacement program**

At Aqua, we are implementing a program that involves replacing all lead and galvanized service lines in our drinking water systems at no direct cost to our customers. Information about our lead and galvanized service line replacement program is attached.

For more information, call us at 1-877-987-2782, or visit our website at <https://www.aquawater.com/about-water/water-quality/lead.php>. For more information on reducing lead exposure around your home/building and the health effects of lead, visit EPA's website at <http://www.epa.gov/lead> or contact your health care provider.

Attachment: Customer Lead Service Line Replacement Program Information Sheet

*\*This information sheet contains regulatorily required or recommended language and nothing herein is intended as, nor should be construed as, a promise of or a contract for payment or reimbursement of expenses incurred for any action you take on account of this information sheet.*

# Customer Lead Service Line Replacement Program Information Sheet



## **BACKGROUND – AQUA CUSTOMER LEAD SERVICE LINE REPLACEMENT PROGRAM**

Lead is a naturally occurring metal that can cause a variety of adverse health effects. While the most common sources of lead exposure are soil, paint chips and dust, drinking water is another route of lead exposure, primarily as a result of corrosion of lead pipes and plumbing materials. The Pennsylvania General Assembly determined it is in the public interest for water utilities to assist customers in the replacement of customer-owned lead, or galvanized requiring replacement (“galvanized”), service lines throughout Pennsylvania.

The service line that provides water service to a property is made up of two parts: a Company-owned portion (which connects from the Company’s main to the curb line) and a customer-owned portion (which connects from the curb line to a customer’s structure). Customers, or property owners if the customer is not the property owner (“Customer”) are required to maintain and repair the Customer-owned portion of the service line.

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”) now has been granted the authority to assist Customers in replacing the Customer-owned portion of the service line if that service line is identified as lead or galvanized.

## **CUSTOMER-OWNED LEAD SERVICE LINE REPLACEMENT PROGRAM**

Under the Customer Lead Service Line Replacement Program (“Replacement Program”), Aqua will identify customer-owned service lines that are lead or galvanized, enter into an agreement with the Customer to replace the Customer-owned portion of the service line and restore the Customer’s property at no direct cost to the customer, dedicate the newly installed customer portion of the service line back to the Customer, and provide a warranty on the work completed to replace the Customer-owned lead or galvanized service line.

Aqua’s Replacement Program is made up of two parts: (1) replacements in connection with a main replacement project, and (2) replacements per Customer request not associated with a main replacement project.

### **Cap on Replacements Per Year**

Aqua can perform up to 1,500 customer-owned lead or galvanized service line replacements per year.

### **Customer Agreement and Replacement**

In order for Aqua to complete a replacement, the Customer must enter into an agreement with Aqua to replace the Customer-owned lead or galvanized service line. Aqua cannot replace the Customer portion of a lead or galvanized service line without first entering into an agreement. The agreement provides that the Customer will give access to Aqua, or Aqua’s contractor, to complete the

replacement. Following replacement, Aqua, or Aqua’s contractor, will restore the property as reasonably as practicable to its former condition prior to the replacement of the Customer-owned lead or galvanized service line.

### **Dedication of Newly Installed Customer Portion of Service Line and Warranty**

After the new Customer-owned portion of the service line is installed, the Customer-owned portion will be dedicated to the Customer and ownership and responsibility for repair and maintenance of the Customer-owned portion of the service line will remain with the Customer as was the case prior to the replacement. A two-year warranty on the workmanship and materials of the installation and the restoration of surfaces shall be provided.

### **Coordination of Replacements**

Aqua will strive to group customer requested replacements within its operating divisions to create efficiencies. However, Aqua may replace a Customer’s lead or galvanized service line if projects cannot be grouped together in its discretion.

### **Filters, Sampling and Testing**

Upon identification of a customer lead or galvanized service line, Aqua will provide a National Sanitation Foundation approved water filter (pitcher or tap filter) and six months of replacement filters. At approximately 3-6 months after replacement is completed, Aqua will offer water sampling materials to Customers or residents, and if Customer or resident wants to have samples taken, Aqua will collect, test, and provide the results from those samples.

### **Reimbursement for Customers that Have Already Replaced a Lead or Galvanized Service Line**

As part of Aqua’s Replacement Program, Aqua will provide a reimbursement to those Customers that have replaced their Customer-owned lead or galvanized service line within certain time periods subject to certain requirements. Reimbursement will occur for those Customers that provide documentation sufficient, in Aqua’s sole discretion, to verify that the Customer replaced the Customer-owned lead or galvanized service line within one year before or after the start of a planned lead service line replacement project main replacement and as long as the Customer is within one mile of the main replacement project or focused replacement area. Customers will be eligible for reimbursement up to 125% of the average cost of Aqua’s lead and galvanized replacements. Average cost used to determine reimbursement amounts during a calendar year will be based on Aqua’s prior calendar year average costs for lead and galvanized service line replacements. Examples of documentation required by Aqua for a Customer to be eligible for reimbursement include, but are not limited to, detailed estimates from a licensed plumber and paid invoices or statements. A verified statement may also be submitted from the licensed plumber.

### **Partial Replacements Prohibited**

Under the Pennsylvania Public Utility Commission’s (“PUC”) regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line. If a Customer causes a partial replacement, by replacing the Customer portion of a lead or galvanized service line without notifying Aqua, Aqua is

required to terminate service until a full replacement of the lead or galvanized service line can be completed.

In addition, any Customer that refuses to allow Aqua (or its contractor) to replace the lead or galvanized service line, or refuses to employ its own licensed plumber to replace the lead or galvanized service line, will result in termination of service to the property until the entire lead or galvanized service line is replaced.

Aqua may, in its sole discretion, use Step In Rights as described in Aqua's tariff to perform a replacement if the customer or occupier of the property is not the owner, Aqua has attempted to contact the owner with an offer to replace the Customer lead service line and has not received a response, and such replacement is in the public interest to avoid termination of service to a property where the customer is not the owner of the property.

## **CONCLUSION**

Aqua recognizes the importance of removing lead from water systems across Pennsylvania both on Aqua owned and Customer-owned assets. Aqua looks forward to working with Customers to achieve this goal.

# EXHIBIT W

Press Release Regarding Action Level  
Exceedance – 40 C.F.R. § 141.85(b)(2)(v)

**Contact:** [INSERT]**For release:** [DATE]

## **IMPORTANT INFORMATION ABOUT LEAD IN YOUR DRINKING WATER<sup>1</sup>**

**BRYN MAWR, Pa.** – [INSERT NAME OF WATER SYSTEM] found elevated levels of lead in drinking water in some homes/buildings. Lead can cause serious health problems, especially for pregnant women and young children. Please read this information closely to see what you can do to reduce lead in your drinking water.

### **Health Effects of Lead**

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

### **Sources of Lead**

Lead is a common metal found in the environment. Drinking water is one possible source of lead exposure. Lead Service lines, brass faucets, fittings, and valves, including those advertised as “low lead” or “lead-free,” may contribute lead to drinking water. Regulations previously allowed “low lead” fixtures containing up to 8 percent lead. Current regulations only allow “lead-free” fixtures with up to 0.25 percent lead. When water is in contact with pipes, service lines, or plumbing that contains lead for several hours, the lead may enter drinking water. Homes built before 1990 are more likely to have lead pipes or lead solder.

The main sources of lead exposure are lead-based paint, lead-contaminated dust or soil, and some plumbing materials. In addition, lead can be found in certain types of pottery, pewter, brass fixtures, food, and cosmetics. Other sources include exposure in the workplace and exposure from certain hobbies (lead can be carried on clothing or shoes). Lead is found in some toys, some playground equipment, and some children’s metal jewelry.

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<sup>1</sup> This information contains regulatory or recommended language, and nothing herein is intended as, nor should be construed as, a promise of or contract for payment or reimbursement of expenses incurred for any action you take on account of this information sheet.

## Steps You Can Take to Reduce Your Exposure to Lead in Your Water

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **Do not boil water to remove lead.** Boiling water will not reduce lead.
- **Consider alternative sources or treatment of water.** You may want to consider purchasing bottled water or a water filter. Read the package to be sure the filter is approved to reduce lead or contact NSF International ([www.nsf.org](http://www.nsf.org)) for information on performance standards for water filters. Be sure to maintain and replace a filter device in accordance with the manufacturer's instructions to protect water quality.
- **Test your water for lead.** Call us at 1-877-987-2782 to find out how to get your water tested for lead.
- **Get your child's blood tested.** Contact your local health department or healthcare provider to find out how you can get your child tested for lead if you are concerned about exposure.

## What happened? What is being done?

[Notice Specific Information: Explain why there are elevated levels of lead in the system's drinking water (if known) and what the water system is doing to reduce the lead levels in homes/buildings in this area.]

## Aqua's lead and galvanized service line replacement program

At Aqua, we are implementing a program that involves replacing all lead and galvanized service lines in our drinking water systems at no direct cost to our customers. Information about our lead and galvanized service line replacement program is attached. For more information, call us at 1-877-987-2782, or visit our website at <https://www.aquawater.com/about-water/water-quality/lead.php>.

"We take seriously our responsibility to sustain life by safely delivering Earth's most essential resource, and our mission is exemplified by our commitment to remove lead service lines from drinking water systems across Pennsylvania," said Aqua Pennsylvania President Marc Lucca. "Our lead service line replacement program enables our team to ensure safe drinking water for our customers without unnecessarily burdening them with the direct cost of replacement."

For more information on reducing lead exposure around your home/building and the health effects of lead, visit EPA's website at <http://www.epa.gov/lead> or contact your health care provider.

Aqua Pennsylvania serves approximately 1.5 million people in 32 counties throughout the Commonwealth of Pennsylvania. Visit [AquaWater.com](http://AquaWater.com) for more information or follow Aqua on Facebook at [facebook.com/AquaWater](https://facebook.com/AquaWater) and on Twitter at [@AquaWater](https://twitter.com/AquaWater).

This release contains forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995, including, among others: the Company's ability to replace all lead and galvanized requiring replacement service lines in its drinking water systems and to do this at no direct cost to its customers. There are important factors that could cause actual results to differ materially from those expressed or implied by such forward-looking statements including: general economic business conditions; the receipt of governmental approvals; and other factors discussed in our Annual Report on Form 10-K, our Quarterly Reports on Form 10-Q, and other filings with the Securities and Exchange Commission. For more information regarding risks and uncertainties associated with Essential Utilities' business, please refer to Essential Utilities' annual, quarterly and other SEC filings. Essential Utilities is not under any obligation — and expressly disclaims any such obligation — to update or alter its forward-looking statements whether as a result of new information, future events or otherwise.

# # #

# **P-7 Attachment 1**

AQUA PENNSYLVANIA, INC.  
(hereinafter referred to as the "Company")

RATES, RULES, AND REGULATIONS

GOVERNING THE DISTRIBUTION AND SALE OF

WATER SERVICE

IN PORTIONS OF

ADAMS, BERKS, BRADFORD, BUCKS, CARBON, CHESTER, CLARION, CLEARFIELD,  
COLUMBIA, CRAWFORD, CUMBERLAND, DELAWARE, FOREST, JUNIATA,  
LACKAWANNA, LAWRENCE, LEHIGH, LUZERNE, MERCER, MCKEAN, MONROE,  
MONTGOMERY, NORTHHAMPTON, NORTHUMBERLAND, PIKE, SCHUYLKILL,  
SUSQUEHANNA, SNYDER, VENANGO, WARREN, WAYNE, AND WYOMING COUNTIES

IN THE COMMONWEALTH OF PENNSYLVANIA

ISSUED: xxxx xx, 202x

EFFECTIVE: xxxx xx, 202x

By:

Marc Lucca, President  
Aqua Pennsylvania, Inc.  
762 Lancaster Avenue  
Bryn Mawr, Pennsylvania 19010

## **NOTICE**

THIS TARIFF SUPPLEMENT MODIFIES THE EXISTING LEAD SERVICE LINE  
RULES IN COMPLIANCE WITH 52 PA. CODE § 65.51 ET SEQ.

AQUA PENNSYLVANIA, INC.

SUPPLEMENT NO. XX

TARIFF WATER-PA P.U.C. NO. 3

XXXX REVISED PAGE 2

CANCELING XXXX REVISED PAGE 2

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LIST OF CHANGES MADE BY THIS TARIFF

Changes: Supplement No. XX to Tariff Water-PA P.U.C. No. 3 modifies the lead service line rules (Rules 20.1 and 20.2) in compliance with 52 Pa. Code § 65.51 et seq. Refer to pages 1, 2, 3, 4, 48, 49, 50, and 51.

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RULES AND REGULATIONS**SERVICE CONNECTIONS****19. Company's Service Lines:**

Except for service connections made in accordance with Rule 65, the Company will make all connections to its mains and furnish, install and maintain the Company's service main to and including the Curb Stop, which under normal circumstances will be placed inside the curb-line. The Company's service line will be the property of the Company and under its control. The point of delivery and sale for any water service furnished to the Customer shall be at the Curb Stop.

The maximum Company investment per Company service line shall be calculated using the same formula set forth in the definition of Company Contribution in Rule 62.

The cost of any Company service line in excess of the applicable maximum Company investment shall be paid by the Customer, plus all applicable taxes including income taxes occasioned by the contract. The Company may require payment of the estimated amount of such excess cost in advance of the installation and will make a partial repayment of the extent the actual cost is determined to be less than the estimate.

Whenever it is necessary to install a service line in advance of the date on which the premises are occupied and a meter is set, a deposit may be required in an amount not to exceed the estimated cost of installation, which deposit will be refunded to the depositor when the service becomes active (i.e., the meter has been set and the premises occupied), provided that event occurs within five years from the date of deposit.

**20.1. Customer Service Line:** The Customer's service line shall extend from the Property to the Curb Stop or curb line or such point as designated by the Company. All connections, service lines and fixtures owned by the Customer shall be maintained by the Customer in good order, and all meters and appurtenances owned by the Company and located on the Property of the Customer shall be protected properly by the Customer. All leaks in or other deteriorated condition of the Customer's service line or any other pipe or fixture in or upon the premises supplied must be repaired immediately by the owner or occupant of the premises.

(C)

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RULES AND REGULATIONS**SERVICE CONNECTIONS (cont'd)****20.2. Customer Owned Lead Service Line Replacements:****(C)**

Notwithstanding Rules 20.1, 21, and 25, the Company (or contractors employed by the Company) shall replace Customer Owned Lead Service Lines ("COLSLs") pursuant to the Company's Lead Service Line Replacement Program ("Replacement Program"), provided the customer (or the property owner if the customer is not the property owner) provides consent through a signed agreement.

Lead Service Line – LSL – shall be defined as a service line made of lead that connects the water main to a building inlet and a lead pigtail, gooseneck or other fitting that is connected to the lead line. A galvanized service line (iron or steel piping that has been dipped in zinc to prevent corrosion and rusting) is considered a Lead Service Line if it ever was or is currently downstream of any lead service line or service line of unknown material.

Customer Owned Lead Service Line – COLSL – shall be defined as the portion of the lead service line extending from the curb, property line or Company connection to the Company's water meter or, if the Company's water meter is located outside of the structure or water is not metered by the Company, at the first shutoff valve located within the interior of the structure.

The Company will replace up to 1,500 COLSLs per year under the Company's Replacement Program. If reimbursements would cause the Company to exceed its current annual cap, the Company shall increase its current annual cap by the amount of the reimbursement and decrease its next annual cap by this amount.

If no shutoff valve exists along the pipe within 5 feet of the Customer's structure wall, the Company may install a shutoff valve which will serve as the point of demarcation between the property's service line and the property's interior water distribution piping.

No customer or property owner may install a partial LSL. A partial LSL shall result in termination of service until such time as the Company can replace the Company-owned LSL. A customer, or property owner where the customer is not the property owner, that elects to replace the COLSL themselves, shall replace the COLSL concurrent with the Company replacing the Company-owned LSL, provided that the customer or property owner shall provide the Company at least 90 days' notice prior to replacing the COLSL.

The Company shall refuse to establish service to a property where a customer or property owner (if the customer is not the property owner) has previously refused or failed to accept the Company's offer to replace the COLSL until the applicant verifies the replacement of the COLSL by providing a paid invoice from a licensed contractor or verified statement from a licensed contractor attesting to the completion of the COLSL replacement. The customer or property owner may also request Aqua (or its contractor) complete the COLSL replacement. Upon completion, service will be established or restored to the property.

Through the Replacement Program the Company will perfect any ownership discrepancies regarding the Company Service Line and the Customer Service Line, so that the Customer will own the Customer Service Line and the Company will own the Company Service Line. This will occur by the Customer and the Company executing the Customer Lead/Galvanized Service Line Replacement License Agreement which establishes the Customer's and Company's respective ownership and responsibilities regarding the Customer Service Line and Company Service Line.

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RULES AND REGULATIONS**SERVICE CONNECTIONS (cont'd)****20.2. Customer Owned Lead Service Line Replacements (cont'd):****(C)**Step In Rights

The Company may utilize Step In Rights in the following circumstances where a customer or occupier of a premise is not the property owner. The Company is authorized to replace a COLSL when:

- a. The Company has attempted to contact the property owner with an offer to replace the COLSL in accordance with the Company's LSLR Plan.
- b. The Customer or the occupier of the Property is not the property owner.
- c. The Company has attempted to get authorization to replace the COLSL, the property owner cannot be identified, or the property owner has been notified and has not responded to the Company's offer to replace the COLSL.

In these circumstances, the Company may, in its discretion, replace the COLSL in accordance with the Company's LSLR Plan if such replacement would avoid the termination of water service to the Customer or the occupier of the property without obtaining the consent of the property owner. When the Company exercises Step In Rights, the Company, its officers, directors, employees and agents are released and held harmless from and against any and all liability, including liability to third parties and the property owner, for personal injury, including death, property damage, or other actions, damages, fines, penalties, claims, demands, judgments, losses, costs, expenses, suit and actions (including reasonable attorney's fees), for personal injury, including death, property damage or other injury, to the extent caused by or arising out of the work performed by the Company or its agents in replacing the COLSL.

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RULES AND REGULATIONS**SERVICE CONNECTIONS (cont'd)****20.2. Customer Owned Lead Service Line Replacements (cont'd):****(C)**Reimbursements

The Company shall provide a reimbursement to an eligible customer or property owner, if the customer is not the property owner, who replaced their LSL within 1 year before or after the commencement of a Lead Service Line Replacement (“LSLR”) Project. A LSLR Project shall be defined as a Company scheduled lead service line replacement activity either in conjunction with main replacements, or a specific delineated project area to replace LSLs. LSLR Project Commencement shall be defined as installation of the first lead service line replacement within a lead service line project area. LSLR Project Area shall be defined as the area encompassing the Company’s scheduled lead service line replacement activities, which includes the area within a 1-mile radius of a LSLR Project, if that area is served by the Company.

Reimbursements to customers or property owners, if the customer is not the property owner, require that the customer or property owner provides the Company with a paid invoice, a certification or verified statement from a certified plumber, and other documentation required by the Company, in its sole discretion, to verify the replacement. Failure to provide sufficient information will result in no reimbursement being paid. The Company shall reimburse eligible customers or property owners up to 125% of the average costs of Aqua’s LSLRs, not to exceed the actual cost incurred by the customer to replace their LSL. The average cost of Aqua’s LSLRs in any year will be determined by the average cost of Aqua LSLRs in the prior calendar year. Reimbursements will be provided to customers or property owners through check mailed to the customer or property owner within 90 days of the request; provided that all documentation is sufficient and received by the Company. Customers or property owners that are outside the LSLR Project Area or seek reimbursement for a replacement that occurred greater than one year before or after the LSLR Project Commencement will be ineligible for reimbursement.

Warranty

The Company (or its contractor) shall provide a warranty to the customer or property owner, if the customer is not the property owner, for a period of two years on the workmanship and materials of the LSLR and the restoration of surfaces. The two year warranty shall commence upon the re-establishment of water service to the property after the LSLR has occurred.

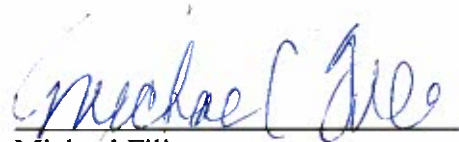
The maximum coverage under the warranty shall be only to repair or replace the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces which shall mean restoration as reasonably as practicable to the condition that existed prior to the LSLR. The maximum coverage amount for replacing or repairing the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces shall be an amount up to Twenty Thousand Dollars (\$20,000.00).

The Company will not be liable for any damages beyond the maximum coverage of the two year warranty as described in this warranty section.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

**VERIFICATION**

I, Michael Fili, Vice President, Capital Planning, Design & Construction of Aqua Pennsylvania, Inc., hereby state that the facts set forth in Aqua Pennsylvania, Inc.'s Responses to the Bureau of Technical Utility Services Data Requests Set 1 in the matter at Docket No. P-2023-3044459, are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in blue ink that reads "Michael Fili". The signature is written in a cursive style and is positioned above a horizontal line.

Michael Fili  
Vice President, Capital Planning,  
Design & Construction  
Aqua Pennsylvania, Inc.

Dated: January 25, 2024