



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

IN REPLY, PLEASE
REFER TO OUR FILE

April 12, 2024

Docket No. M-2024-3047018
Utility Code 212285

ELIZABETH ROSE TRISCARI, ESQUIRE
DIRECTOR, CORPORATE COUNSEL
PENNSYLVANIA-AMERICAN WATER COMPANY
852 WESLEY DRIVE
MECHANICSBURG PA 17055
ELIZABETH.TRISCARI@AMWATER.COM

RE: Pennsylvania-American Water Company 2023 Annual Asset Optimization Plan at
Docket No. M-2024-3047018

Dear Attorney Triscari:

On February 29, 2024, Pennsylvania-American Water Company (PAWC) filed the above-captioned document with the Pennsylvania Public Utility Commission (Commission). To assist the Commission in conducting the review of PAWC's Annual Asset Optimization Plan (AAOP), please respond with the information requested in Attachment 1. In order to review the additional information requested, the Commission hereby extends the consideration period of PAWC's AAOP to May 29, 2024.

Please forward the information to the Secretary of the Commission **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information, and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature _____
Title _____
Date _____

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite review of PAWC’s AAOP, please send a copy of the information to Ken Shaffer via e-mail at kennshaffe@pa.gov. Questions may be directed to Ken Shaffer in the Bureau of Technical Utility Services, at 717-787-2359. Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure: Attachment 1

cc: Dan Searfoorce, TUS
John Van Zant, TUS
David Screven, LAW
Allison Kaster, BIE

Attachment 1
TUS Data Request Set 2
Annual Asset Optimization Plan (AAOP) for Pennsylvania-American Water Company
Docket No. M-2024-3047018

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

1. Reference Pennsylvania-American Water Company's (PAWC) 2023 AAOP
 - a. In the instant AAOP filing, PAWC reported actual expenditures of \$307.57 million in 2023, as compared to the projection of \$187.85 million in PAWC's Long-Term Infrastructure Improvement Plan (LTIIIP). This is an approximate 64% increase in spending. PAWC's AAOP projects \$270.53 million in expenditures in 2024, as compared its LTIIIP projection of \$181.87 million. This is an approximate 49% increase in spending. PAWC's actual LTIIIP expenditures in 2022 and 2023 when combined with its projected expenditures for 2024 represent 87%, or \$810.74 million, of the total projected LTIIIP spending of \$936.32.¹ Factoring in PAWC's 2025 and 2026 forecasted spending for the remainder of its LTIIIP, PAWC could spend a total of approximately \$1.2 billion, which represents a 26% overspend. Please state if PAWC plans to decrease its expenditures for the remaining two years of the LTIIIP, or if PAWC will be filing a petition for modification of its LTIIIP in order to incorporate the significant increase in projected spending.²
 - b. If PAWC plans to file a petition for modification to its LTIIIP, state the expected date the petition will be filed.

¹ See, *Petition of Pennsylvania American Water Company for Approval of its Second Long-Term Infrastructure Improvement Plan*, Order entered December 16, 2021, at Docket No. P-2021-3028300.

² See, 52 Pa. Code § 121.5(a).