



Eckert Seamans Cherin & Mellott, LLC  
213 Market Street  
8<sup>th</sup> Floor  
Harrisburg, PA 17101

TEL: 717 237 6000  
FAX: 717 237 6019

Sarah C. Stoner  
717.237.6026  
sstoner@eckertseamans.com

June 24, 2024

**Via eFiling**

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

Re: City of Lock Haven Water Department Supplement No. 19 to Water-PA P.U.C. No. 1  
Docket No. R-2024-3049248

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Dear Secretary Chiavetta:

Enclosed for electronic filing please find the City of Lock Haven Water Department's Responses to the Bureau of Technical Utility Services' Data Requests, Set I, Nos. 1, 3-4, 6, and 8-17 with regard to the above-referenced matter. Copies to be served in accordance with the attached Certificate of Service.

Sincerely

*Sarah C. Stoner*  
Sarah C. Stoner

SCS/lww  
Enclosure

cc: Cert. of Service w/enc.  
Paul Zander w/enc. ([pzander@pa.gov](mailto:pzander@pa.gov))

## CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of the City of Lock Haven's Responses to Staff Data Requests upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

### **Via Email Only**

Michael Podskoch, Jr., Esq.  
Bureau of Investigation & Enforcement  
PA Public Utility Commission  
400 North Street  
Harrisburg, PA 17120  
[mpodskoch@pa.gov](mailto:mpodskoch@pa.gov)

Paul Diskin, Director  
Bureau of Technical Utility Services  
PA Public Utility Commission  
400 North Street  
Harrisburg, PA 17120  
[pdiskin@pa.gov](mailto:pdiskin@pa.gov)

Daniel Searfoorce  
Manager – Water, Reliability, and  
Emergency Preparedness Division  
Bureau of Technical Utility Services  
PA Public Utility Commission  
400 North Street  
Harrisburg, PA 17120  
[dsearfoorc@pa.gov](mailto:dsearfoorc@pa.gov)

Patrick Cicero, Esq.  
Christine Maloni Hoover, Esq.  
Erin Gannon, Esq.  
Office of Consumer Advocate  
555 Walnut St., 5<sup>th</sup> Fl., Forum Place  
Harrisburg, PA 17101  
[pcicero@paoca.org](mailto:pcicero@paoca.org)  
[CHoover@paoca.org](mailto:CHoover@paoca.org)  
[EGannon@paoca.org](mailto:EGannon@paoca.org)

Sharon Webb, Esq.  
Office of Small Business Advocate  
555 Walnut St., 1<sup>st</sup> Fl., Forum Place  
Harrisburg, PA 17101  
[swebb@pa.gov](mailto:swebb@pa.gov)

Dated: June 24, 2024

*Sarah C. Stoner*

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Sarah C. Stoner, Esq.

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-1**      The City of Lock Haven Water Department's (Lock Haven's) Supplement No. 19 to Water-PA P.U.C. No. 1 (Supplement No. 19) and supporting data (collectively, the Tariff Supplement Filing) contain averments that have not been personally verified by a Lock Haven authorized officer or another authorized employee. Instead, Lock Haven's Tariff Supplement Filing was verified by Lock Haven's contractor, Raftelis Financial Consultants, Inc. Please provide a signed verification statement that: (1) references the Tariff Supplement Filing 1 and the date that the Tariff Supplement Filing was filed with the Commission; (2) is signed by Lock Haven's authorized officer or other authorized employee that is personally verifying Tariff Supplement Filing data; and (3) complies with 52 Pa. Code § 1.36(b).

**Response:** The verification is enclosed in Attachment TUS-I-R-1.

**Response provided by:** Greg Wilson, City Manager, City of Lock Haven

**Date:** June 24, 2024

**VERIFICATION**

I, Gregory J. Wilson, hereby state that: (1) I am Manager for the City of Lock Haven; (2) the facts set forth in the City of Lock Haven’s Supplement No. 19 to Water – PA P.U.C. No. 1 and supporting data filed on May 24, 2024 at Docket No. R-2024-3049248 are true and correct (or are true and correct to the best of my knowledge, information and belief); and (3) 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).

6/5/2024

Dated



Gregory J. Wilson, Manager  
The City of Lock Haven

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-3** 52 Pa. Code § 53.52(c)(1) requires a statement showing Lock Haven’s calculation of the rate of return or operating ratio earned in the HTY. Lock Haven’s Tariff Supplement Filing does not provide this information. Please provide a statement showing Lock Haven’s calculation of the rate of return or operating ratio earned in the HTY.

**Response:** The tables below show the calculation of the rate of return earned in the HTY for the City of Lock Haven’s water system.

Water Fund	2023
BOY Utility Plant in Service	\$ 11,792,897
Plus: Additions	5,461,538
Less: Disposals	-
EOY Utility Plant in Service	\$ 17,254,435
Less: Accumulated Depreciation	(6,383,095)
Less: CY Depreciation	<u>(514,740)</u>
Rate Base	\$ 10,356,599
Rate Base	\$ 10,356,599
Plus: Inventoried Materials and Supplies	58,964
Plus: Working Capital	<u>-</u>
Total Adj Rate Base	\$ 10,415,564

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

Water Fund	2023
<b>Revenues:</b>	
<i>Total User Rates, Fees, and Charges-</i>	\$ 1,543,130
Other Revenues	230,295
<b>Total Revenues</b>	\$ 1,773,425
<b>Operating Expenses:</b>	
General	\$ 1,763,531
LHCA Property Maintenance	46,827
Interfund Transfers	76,673
GF / Water Fund Loan	-
<b>Total Operating Expenses</b>	\$ 1,887,031
<b>EBITDA</b>	\$ (113,606)
Depreciation Expense	514,740
<b>EBIT</b>	\$ (628,346)
Interest Expense	175,746
<b>Net Income</b>	\$ (804,092)

Net Income (add back Interest Expense)	\$ (628,346)
Rate Base	\$ 10,415,564
Return on Rate Base	-6.03%

**Response provided by:** Rocky Craley, Vice President, Raftelis Financial Consultants

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-4** 52 Pa. Code § 53.52(c)(1) requires a statement showing Lock Haven’s calculation of the rate of return or operating ratio earned when the tariff supplement becomes effective. Lock Haven’s Tariff Supplement Filing does not provide this information for the fully projected future test year ending December 31, 2025 (the FPFTY). Please provide a statement showing Lock Haven’s calculation of the rate of return or operating ratio earned in the FPFTY.

**Response:** The tables below show the calculation of the rate of return earned in the FPFTY for the City of Lock Haven’s water system and includes PVS revenues.

Water Fund	2025
BOY Utility Plant in Service	\$ 20,003,198
Plus: Additions	3,869,425
Less: Disposals	<u>-</u>
EOY Utility Plant in Service	\$ 23,872,623
Less: Accumulated Depreciation	(7,515,204)
Less: CY Depreciation	<u>(700,096)</u>
Rate Base	\$ 15,657,323
Rate Base	\$ 15,657,323
Plus: Inventoried Materials and Supplies	100,016
Plus: Working Capital	<u>-</u>
Total Adj Rate Base	\$ 15,757,339

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

Water Fund	2025
<b>Revenues:</b>	
<i>Total User Rates, Fees, and Charges-</i>	\$ 2,867,958
Other Revenues	<u>168,604</u>
<b>Total Revenues</b>	\$ 3,036,562
<b>Operating Expenses:</b>	
General	\$ 2,039,339
LHCA Property Maintenance	59,741
Interfund Transfers	85,265
GF / Water Fund Loan	<u>122,347</u>
<b>Total Operating Expenses</b>	\$ 2,306,691
<b>EBITDA</b>	\$ 729,871
Depreciation Expense	<u>700,096</u>
<b>EBIT</b>	\$ 29,775
Interest Expense	<u>169,293</u>
<b>Net Income</b>	\$ (139,518)

Net Income (add back Interest Expense)	\$ 29,775
Rate Base	\$ 15,757,339
Return on Rate Base	<u>0.19%</u>

**Response provided by:** Rocky Craley, Vice President, Raftelis Financial Consultants

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-6** Lock Haven's effective tariff, Pages 20, 20A, 21, 21A, and 22 include certain rates for public and private fire protection services that became effective June 1, 1996, at Docket No. R-00953538. Also, Appendix A of Lock Haven's Joint Petition for Settlement of Rate Investigation filed at Docket R-2010-2174543 (2010 Settlement) specified \$5,700 in annual revenues for the Fire Protection customer class, and Schedule F of Lock Haven's supporting data filed at that docket identified that Lock Haven served 10 private fire hydrants, 39 private fire service lines, and 237 public fire hydrants. However, Lock Haven's Tariff Supplement Filing does not include data for the Fire Protection customer class, and the \$5,700 in annual Fire Protection revenues from the 2010 Settlement appears to be below Lock Haven's Fire Protection tariff rates, assuming that Lock Haven services are provided at tariff rates for all customers (i.e., 247 fire hydrants \* \$65/fire hydrant/year = \$16,055/year, excluding private fire service line revenues). Please provide the following data for Fire Protection services at the end of the FPFTY:

- a. Quantify the number of Fire Protection customers served by Lock Haven, broken down by public fire protection customers and private fire protection customers, and further broken down by Commission-jurisdictional (Outside) customers and non-Commission-jurisdictional (Inside) customers;
- b. Quantify the number of public fire hydrants served by Lock Haven and related annual revenues;
- c. Quantify the number of private fire hydrants and private fire service lines and related annual revenues. Also, provide a breakdown of fire service line sizes; and
- d. Provide justification for, and quantify the value of, any differences between Lock Haven's rates for Outside and Inside public fire hydrants, private fire hydrants, and private fire service lines.

**Response:** a. Please see response to TUS-I-R-8.

b. The Water Department serves 135 non-jurisdictional public fire hydrants and 82 jurisdictional public fire hydrants. Lock Haven receives annual revenues of \$5,525 from jurisdictional public fire hydrants.

c. The Water Department serves 3 private jurisdictional fire hydrants and receives \$195 in related annual revenues. See also response to TUS-I-R-8.

d. See response to TUS-I-R-8. The Water Department does not charge for public fire hydrants within the City as it is a traditional self-supply arrangement and a benefit of owning the water system.

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Response provided by:** Greg Wilson, City Manager, City of Lock Haven

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-8** The Tariff Supplement Filing, Water Rate Study, Page 18, indicated that Lock Haven is proposing to recover approximately \$270,782 in net unrecovered public and private fire protection costs from other customer classes, rather than from Fire Protection customers. Please explain why Lock Haven is not proposing to recover fire protection costs directly from Fire Protection customers.

**Response:** There are a small number of fire protection customers and hydrants. We elected to recover fire protection costs to the extent allowable through existing private fire line and hydrant charges.

The City's existing private fire line charges and hydrant charges, number of customers, and projected annual revenue (based on existing private fire line and hydrant charges) are shown in the table below. The table also shows the cost of service based fire line charges and the cost of service based hydrant charges. All charges shown are annual charges.

The table shows that annual private fire protection revenues from jurisdictional customers under existing fire line charges were calculated to be \$1,373, while based on cost of service based fire line charges, the revenues from these customers were calculated to be \$27,620, a difference of \$26,247.

The table shows that annual hydrant revenues from jurisdictional customers under existing hydrant charges were calculated to be \$5,525, while based on cost of service based hydrant charges, the revenues from these customers were calculated to be \$21,235, a difference of \$15,710.

**Response of the City of Lock Haven Water Department  
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<b>Fire Protection</b>						<b>Fire Protection</b>			
Nonjurisdictional (city)						Nonjurisdictional (city)			
Number of Customers	Type	Size	Current Rate	Frequency	Revenue at Current Rates	COS Rate	Frequency	Revenue at COS Rates	
1	Private	2"	\$ 23.40	per year	\$ 23	\$ 88.38	per year	\$ 88	
1	Private	3"	\$ 23.40	per year	\$ 23	\$ 232.00	per year	\$ 232	
10	Private	4"	\$ 46.80	per year	\$ 468	\$ 607.63	per year	\$ 6,076	
4	Private	6"	\$ 78.00	per year	\$ 312	\$ 994.31	per year	\$ 3,977	
2	Private	8"	\$ 109.20	per year	\$ 218	\$ 2,209.57	per year	\$ 4,419	
2	Private	10"	\$ 140.40	per year	\$ 281	\$ 3,590.55	per year	\$ 7,181	
1	Public	3"	\$ 23.40	per year	\$ 23	\$ 232.00	per year	\$ 232	
3	Public	4"	\$ 46.80	per year	\$ 140	\$ 607.63	per year	\$ 1,823	
6	Public	6"	\$ 78.00	per year	\$ 468	\$ 994.31	per year	\$ 5,966	
1	Public	8"	\$ 109.20	per year	\$ 109	\$ 2,209.57	per year	\$ 2,210	
<b>TOTAL</b>					\$ 2,067			\$ 32,204	
<b>Jurisdictional: Castanea Twp</b>						<b>Jurisdictional: Castanea Twp</b>			
1	Private	4"	\$ 46.80	per year	\$ 47	\$ 607.63	per year	\$ 608	
1	Private	12"	\$ 171.60	per year	\$ 172	\$ 3,590.55	per year	\$ 3,591	
<b>Jurisdictional: Wayne Twp</b>						<b>Jurisdictional: Wayne Twp</b>			
1	Public	4"	\$ 46.80	per year	\$ 47	\$ 607.63	per year	\$ 608	
1	Private	6"	\$ 78.00	per year	\$ 78	\$ 994.31	per year	\$ 994	
5	Private	8"	\$ 109.20	per year	\$ 546	\$ 2,209.57	per year	\$ 11,048	
1	Private	10"	\$ 140.40	per year	\$ 140	\$ 3,590.55	per year	\$ 3,591	
2	Private	12"	\$ 171.60	per year	\$ 343	\$ 3,590.55	per year	\$ 7,181	
<b>TOTAL</b>					\$ 1,373			\$ 27,620	
<b>Hydrants</b>						<b>Hydrants</b>			
Nonjurisdictional (city)						Nonjurisdictional (city)			
135	Public		\$ -	per year	\$ -	\$249.82	per year	\$ 33,726	
Jurisdictional: Castanea Twp						Jurisdictional: Castanea Twp			
36	Public		\$ 65.00	per year	\$ 2,340	\$249.82	per year	\$ 8,994	
Jurisdictional: Wayne Twp						Jurisdictional: Wayne Twp			
46	Public		\$ 65.00	per year	\$ 2,990	\$249.82	per year	\$ 11,492	
3	Private		\$ 65.00	per year	\$ 195	\$249.82	per year	\$ 749	
<b>TOTAL</b>					\$ 5,525			\$ 21,235	
<b>COMBINED TOTAL</b>								\$ 114,785	

**Response provided by:** Rocky Craley, Vice President, Raftelis Financial Consultants

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-9** Supplement No. 19, Page 5A included proposed language that would require customers to be responsible for excavation and installation of water service lines to the point of connection at Lock Haven's water main, and that would impose certain connection fees. Also, Supplement No. 19 removes existing tariff language that requires Lock Haven to install and maintain at its own cost and expense all service connections for general service. Please confirm that Lock Haven will continue to install, own, operate, maintain, and replace existing and future water service lines, couplings, and curb stops that connect with the inlet connection of a service line of a customer at the curb or property line.

**Response:** Confirmed.

**Response provided by:** Greg Wilson, City Manager, City of Lock Haven

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-10** Supplement No. 19, Page 25E included the undefined terms “EDU” “REMS”, where it appears that Lock Haven intended to use the defined term Equivalent Residential Meter Size (ERMS). Please confirm that Lock Haven will replace the terms “EDU” and “REMS” with “ERMS”.

**Response:** Confirmed. The terms “EDU” and “REMS” have been replaced with “ERMS” in the pro forma tariff supplement filed on June 14, 2024, and this correction will be reflected in the tariff supplement going forward.

**Response provided by:** Greg Wilson, City Manager, City of Lock Haven

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-11** Lock Haven's PENNVEST Surcharge (PVS) Petition at Docket No. P-2024-3049249 (PVS Petition), Exhibit 1, Payment History and Amortization Schedule, appears to indicate that annual payments will be \$275,936.64 until April 1, 2029, when payments will increase to \$291,265.68. However, the PVS Petition's Exhibit 2 appears to indicate that the PVS is expected to provide \$334,396 in annual revenues. Please explain why Lock Haven is proposing \$334,396 in annual revenues compared with \$275,936.64 in annual payments.

**Response:** Exhibit 1 provides a summary of the terms of the 2022 PENNVEST Loan and the Funding Agreement between the City and PENNVEST. The PVS will recover principal and interest of \$275,936.64 in FY 2025 related to this loan. The PVS will also recover projected interest related to two future PENNVEST loans. The first of the two future PENNVEST loans is projected to incur \$50,425 of interest in the fully projected future test year, while the second of the two loans is projected to incur \$8,034 of interest in the fully projected future test year.

This results in \$334,396 ( $\$275,937 + \$50,425 + \$8,034$ ) of principal and interest payments associated with three separate PENNVEST loans in the fully projected future test year, which can be cross referenced to the annual revenues from the PVS in the fully projected future test year shown in Exhibit 2.

**Response provided by:** Rocky Craley, Vice President, Raftelis Financial Consultants

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-12** Lock Haven’s PVS does not appear to include clearly defined baseline values for PI that demonstrate how Lock Haven will calculate PI for Outside customers. For example, it is unclear whether Lock Haven will calculate PI at a fixed rate of \$106,048, at a formula rate of \$334,396 divided by the ratio of Outside ERMS to Inside plus Outside ERMS determined as of the end of each billing period, or by some other value or method. Please provide Lock Haven’s baseline values for PI, including any fixed rates or formula rates used to calculate those values.

**Response:** PI is not directly calculated for Outside customers. Instead PVS charges are calculated based on the PENNVEST PI to be recovered by the PVS in the fully projected future test year (\$334,396) and the number of Inside and Outside customer equivalent meters served by the system (4,188).

The following table shows the number of customer meters by meter size and the resulting equivalent meters for Inside customers.

Inside Customer Equivalent Meters

Meter Size	All Classes	Equivalency Factor	Equivalent Meters
5/8" or 3/4"	2,059	1.0	2,059.3
1"	63	2.5	156.3
1-1/4"	-	3.8	-
1-1/2"	22	5.0	110.0
2"	26	8.0	208.0
3"	4	17.5	70.0
4"	4	31.5	126.0
6"	2	65.0	130.0
8"	-	140.0	-
10"	-	210.0	-
12"	-	265.0	-
	2,180		2,860

The following table shows the number of customer meters by meter size and the resulting equivalent meters for Outside customers.

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

Outside Customer Equivalent Meters

Meter Size	All Classes	Equivalency Factor	Equivalent Meters
5/8" or 3/4"	1,034	1.0	1,033.8
1"	17	2.5	41.3
1-1/4"	-	3.8	-
1-1/2"	8	5.0	40.0
2"	10	8.0	80.0
3"	4	17.5	70.0
4"	2	31.5	63.0
6"	-	65.0	-
8"	-	140.0	-
10"	-	210.0	-
12"	-	265.0	-
	1,074		1,328

The PENNVEST PI to be recovered with the PVS is calculated by divided by the number of equivalent meters (2,860 + 1,328 = 4,188) to come up with the PVS per equivalent meter (\$79.86). The PVS per equivalent meter of \$79.86 is multiplied by the number of Outside customer equivalent meters (1,328) to calculate the PENNVET PI to be recovered from outside customers of \$106,048.

**Response provided by:** Rocky Craley, Vice President, Raftelis Financial Consultants

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-13** Lock Haven’s PVS does not include clearly defined reconciliation procedures, including reconciliation periods that have defined start and end dates and Lock Haven’s methods to calculate refunds or recoupments and related recovery periods. Please provide Lock Haven’s reconciliation procedures, including reconciliation periods that have defined start and end dates and Lock Haven’s methods to calculate refunds or recoupments and related recovery periods, and indicate where these procedures are described in Supplement No. 19.

**Response:** Lock Haven’s proposed reconciliation procedures are described in its May 24, 2024 Petition for Authorization to Implement a PENNVEST Surcharge (*see* pages 13-14 and 17), and in Supplement No. 19 (*see* Page No. 25E).

Supplement No. 19 states that Lock Haven will file an annual reconciliation pursuant to Section 1307(e) of the Public Utility Code within 30 days of the end of the 12-month period. (Supp. No. 19, Page No. 25E, Para. XV.C.6). Although Supplement No. 19 does not state a specific date when the 12-month period ends, Lock Haven will clarify that this is the 12-month period ending on December 31.

Regarding the method to calculate refunds or recoupments, Supplement No. 19 also states that Lock Haven will calculate the reconciliation or “e” factor to recover or to credit customers for any amounts under or overbilled in the prior 12 months, compared to the total PI to be recovered, consistent with Section 1307(e) of the Public Utility Code. (Supp. No. 19, Page No. 25E, Para. XV.C.6). Lock Haven is also willing to add language to the tariff stating that, pursuant to Section 1307(e), the reconciliation will be calculated as the difference between the total revenues received through the PVS during the prior 12-month period and Lock Haven’s total PENNVEST payments during that period. Further, the reconciliation amount will be refunded or recovered over the following 12-month period.

**Response provided by:** Greg Wilson, City Manager, City of Lock Haven

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-14** Please confirm Lock Haven will not recover payments made before Supplement No. 19's effective date through the PVS. Otherwise, provide Lock Haven's defined procedures to recover these payments and indicate where these procedures are described in Supplement No. 19.

**Response:** Confirmed.

**Response provided by:** Greg Wilson, City Manager, City of Lock Haven

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-15** Please provide a copy of the PVS Petition’s Exhibit 2 that includes a separate and distinct proof of revenue for Inside customers.

**Response:** The following table provides a PVS revenue proof for Inside customers.

PVS Revenue Proof for Inside Customers

Meter Size	All Classes	Equivalency Factor	Equivalent Meters	PV Charge per Equivalent Meter	\$ Revenue
5/8" or 3/4"	2,059	1.0	2,059.3	\$79.86	\$ 164,443
1"	63	2.5	156.3	\$79.86	12,477
1-1/4"	-	3.8	-	\$79.86	-
1-1/2"	22	5.0	110.0	\$79.86	8,784
2"	26	8.0	208.0	\$79.86	16,610
3"	4	17.5	70.0	\$79.86	5,590
4"	4	31.5	126.0	\$79.86	10,062
6"	2	65.0	130.0	\$79.86	10,381
8"	-	140.0	-	\$79.86	-
10"	-	210.0	-	\$79.86	-
12"	-	265.0	-	\$79.86	-
	2,180		2,860		\$ 228,348

Outside customer PVS revenue of \$106,048 plus Inside customer PVS revenue of \$228,348 equals total PVS revenue of \$334,396.

**Response provided by:** Rocky Craley, Vice President, Raftelis Financial Consultants

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-16** It does not appear that Lock Haven is proposing to apply its PVS to Fire Protection customers, although Lock Haven's PVS included an exemption for public fire protection customers. Please explain whether it is reasonable to exclude Fire Protection customers from PVS rates, including whether facilities that will be funded by the PVS will exclusively serve base capacity demands that are not typically allocated to Fire Protection customers (e.g., source of supply facilities).

**Response:** Facilities to be funded by the PVS will predominately serve base capacity demands and these costs are not recovered from fire protection charges.

**Response provided by:** Rocky Craley, Vice President, Raftelis Financial Consultants

**Date:** June 24, 2024

**Response of the City of Lock Haven Water Department  
to the Interrogatories of the Bureau of Technical Utility Services, Set I  
Docket No. R-2024-3049248**

**Request: TUS-I-R-17** Please state whether Lock Haven will modify its PVS to apply the PVS to Fire Protection customers if the PVS will fund facilities that serve extra capacity demands that are typically allocated to Fire Protection customers during base rate case filings (e.g., transmission and distribution facilities, etc.).

**Response:** At this time, all PVS-qualified projects contemplated in the near future address base capacity and thus the related PVS is not assessed to fire protection. However, if projects are included that address system peak, then the City will assess the related PVS to fire protection customers.

**Response provided by:** Rocky Craley, Vice President, Raftelis Financial Consultants

**Date:** June 24, 2024

**VERIFICATION**

I, Rocky Craley, hereby state that: (1) I am Vice President, Raftelis Financial Consultants, and Consultant to the City of Lock Haven Water Department; (2) I am authorized to make this Verification on behalf of the City of Lock Haven; (3) the facts set forth in the attached Responses to Staff Data Requests that I am sponsoring are true and correct to the best of my knowledge, information and belief; and (4) that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: June 14, 2024



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Rocky Craley  
Vice President  
Raftelis Financial Consultants

**VERIFICATION**

I, Gregory J. Wilson, hereby state that: (1) I am Manager for the City of Lock Haven Water Department; (2) I am authorized to make this Verification on behalf of the City of Lock Haven; (3) the facts set forth in the attached Responses to Staff Data Requests that I am sponsoring are true and correct to the best of my knowledge, information and belief; and (4) that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: June 14, 2024

  
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Gregory J. Wilson, Manager  
The City of Lock Haven