
Michael W. Hassell

mrulli@postschell.com
717-612-6029 Direct
717-731-1985 Direct Fax
File #: 207302

July 22, 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., as the Receiver for Venango Water Company
For Approval of the Lead Service Line Replacement Program for Venango Water
Company
Docket No. P-2024-**

Dear Secretary Chiavetta:

Attached for filing please find the Petition of Aqua Pennsylvania, Inc., as the Receiver for Venango Water Company For Approval of the Lead Service Line Replacement Program for Venango Water Company.

Copies are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Michael W. Hassell

MWH/kl
Attachment

cc: 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

NazAarah Sabree
Small Business Advocate
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
ra-sba@pa.gov

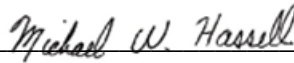
Allison Kaster, Director
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
P.O. Box 3265
Harrisburg, PA 17105-3265
akaster@pa.gov

Patrick Cicero, Esquire
Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
pcicero@paoca.org

VIA FIRST CLASS MAIL

Randall L. Rhodes
Venango Water Company
P.O. Box 397
Reno, PA 16343

Date: July 22, 2024



Michael W. Hassell

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Aqua Pennsylvania, Inc. as the :
Receiver for Venango Water Company : Docket No. P-2024-_____
For Approval of the Lead Service Line :
Replacement Program for Venango Water :
Company

**PETITION OF AQUA PENNSYLVANIA, INC. AS RECEIVER FOR
VENANGO WATER COMPANY FOR APPROVAL OF
THE LEAD SERVICE LINE REPLACEMENT PROGRAM FOR
VENANGO WATER COMPANY**

To The Pennsylvania Public Utility Commission:

Aqua Pennsylvania, Inc. (“Aqua”), as Receiver for the Venango Water Company (“VWC”), hereby files this Petition seeking approval of VWC’s Lead Service Line Replacement (“LSLR”) Program in accordance with Section 1311(b) of the Pennsylvania Public Utility Code (“Public Utility Code” or the “Code”), 66 Pa. C.S. § 1311(b), Chapter 65 of the Public Utility Commission’s (“Commission”) regulations, 52 Pa. Code §§ 65.51, et seq., and the Commission’s Final Rulemaking Order regarding Act 120 of 2018 (“Act 120”) entered on March 14, 2022 at Docket No. L-2020-301952.

Aqua has developed the following LSLR Plan as the Receiver¹ for VWC in accordance with Chapter 65 of the Pennsylvania Public Utility Commission’s (“PUC” or the “Commission”)

¹ Receivership established by the Commission’s Ex Parte Emergency Order dated August 11, 2023, and ratified by the Commission’s Ratification Order dated August 24, 2023 at Docket No. M-2023-3042180. Aqua’s Receivership under Section 529 was consolidated in *Venango Water Company – Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. as Receiver; Section 529 Investigation of Venango Water Company; Section 529 Investigation of Sugarcreek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, Cooperstown Water Company and Blaine E. Rhodes Sewer Company*, Docket Nos. M-2023-3042180, I-2023-3042312, and P-2024-3045205, Deputy Chief Administrative Law Judge Mark A. Hoyer First Interim Order (Mar. 20, 2024) (“Section 529 Proceeding”). All references to Aqua under this Petition and the LSLR Plan are to Aqua as Receiver of VWC.

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 VWC’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). VWC does not have a Long-Term Infrastructure Improvement Plan (“LTIIIP”) on file with the Commission and, therefore, this LSLR Program also includes information regarding the requirements of 52 Pa. Code § 121.3 as required by 52 Pa. Code § 65.54(c).

Aqua, as Receiver for VWC, requests that the Commission approve the proposed LSLR Program, which consists of the following three elements: (1) the LSLR Plan, attached to this Petition as **Exhibit A**; (2) the pro forma tariff supplement containing the proposed changes necessary to implement VWC’s LSLR program, attached to this Petition as **Exhibit B**; and (3) the information required by the Commission under 52 Pa. Code §§ 53.52(a) (related to tariff revisions) and 65.54(c) (related to entities without an LTIIIP), attached to this Petition as **Exhibit C**.

I. INTRODUCTION

1. Aqua is a corporation organized and existing under the laws of the Commonwealth of Pennsylvania and is a wholly-owned subsidiary of Essential Utilities, Inc. (“Essential”). Aqua is a public utility as defined by the Public Utility Code, 66 Pa. C.S. § 102, and has been designated as Receiver of VWC.

2. Aqua owns and operates water treatment facilities including water treatment plants, wells, storage, distribution, and transmission systems throughout Pennsylvania serving approximately 450,000 customers in 32 counties.

3. VWC is a Class C public utility that owns a water system serving approximately 246 customers in Reno, Venango County, Pennsylvania. VWC does not have an LTIIIP on file

with the Commission, and is not authorized to have a Distribution System Improvement Charge (“DSIC”).

4. The names, addresses and telephone numbers of Aqua’s attorneys for this filing are as follows:

Alexander R. Stahl
Regulatory Counsel
Aqua Services, Inc.
762 W. Lancaster Avenue
Bryn Mawr, PA 19010
Phone: 610-645-1130
Email: astahl@aquaamerica.com

Michael W. Hassell
Megan E. Rulli
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6029
Fax: 717-731-1985
Email: mhassell@postschell.com
Email: mrulli@postschell.com

Aqua’s attorneys are authorized to receive all notices and communications regarding this filing.

5. On October 24, 2018, the Governor signed into law Act 120. Act 120, among other measures, amended Section 1311(b) of the Public Utility Code, 66 Pa.C.S. § 1311(b), to allow for public utilities to replace customer-owned lead service lines (“COLSL”) and recover those costs through a utility’s Distribution System Improvement Charge (“DSIC”) if the utility has a DSIC mechanism or through base rates.

6. On March 14, 2022, the Commission entered its Final Rulemaking Order at Docket No. L-2020-3019521, adopting new regulations to implement the lead service line (“LSL”) provisions of Act 120 at Chapter 65 of the Commission’s regulations, 52 Pa. Code §§ 65.51-65.62. The Final Rulemaking Order adopted the requirements set forth in Section 1311(b) of the Public

Utility Code, instituted timelines for the removal and replacement of all LSLs within public utility service territories, and established the regulatory requirements for LSLR programs, LSLR plans, and tariff revisions implementing LSLR programs.

7. The final Commission regulations concerning LSLRs became effective on July 23, 2022. See 52 Pa. Code §§ 65.51-65.62; 52 Pa.B. 4096.

8. Pursuant to the provisions of Section 65.65(a) of the Commission’s regulations related to entities that have not received prior Commission approval to perform LSLR activities, a Class C public utility or municipal corporation must file a LSLR program within 2 years of the effective date of the regulations. See 52 Pa. Code § 65.55(a).

9. Act 120 establishes a standard for COLSL replacements as well as the recovery of costs associated with those replacements. Public water utilities must file a LSLR Plan with the Commission that is consistent with the provisions of Sections 65.54 and 65.55 of the Commission’s regulations. See 52 Pa. Code §§ 65.54 and 65.55.

10. Pursuant to Section 65.54 of the LSLR regulations, a petition seeking approval of a LSLR Program must: (1) be served upon the Commission, the Office of Consumer Advocate (“OCA”), the Commission’s Bureau of Investigation and Enforcement (“I&E”), the Office of Small Business Advocate (“OSBA”), and the parties of record in the entity’s most recent base rate case (52 Pa. Code § 65.54(a)).

11. Specifically, under Section 65.55(b) of the Commission’s regulations, a LSLR program must include the following elements:

(1) A LSLR plan as described in § 65.56 (relating to LSLR plan requirements).

(2) A pro forma tariff or tariff supplement containing the proposed changes necessary to implement the entity’s LSLR program as described in § 65.58 (relating to pro forma tariff or tariff supplement requirements).

(3) Information required by the Commission for filings under 66 Pa.C.S. § 1308 (relating to voluntary changes in rates), including statements required by § 53.52(a) (relating to applicability; public utilities other than canal, turnpike, tunnel, bridge and wharf companies).

12. Under Section 65.56 of the Commission’s regulations, 52 Pa. Code § 65.56, an entity’s LSLR plan must contain:

(a) A service line inventory that complies with the U.S. Environmental Protection Agency’s [“U.S. EPA”] regulations at 40 CFR 141.1-143.20 as enforced by the Department of Environmental Protection [“DEP”].

(b) A section addressing LSLR planning and replacements.

(c) A section addressing communications, outreach, and education that complies with the U.S. EPA’s regulations at 40 CFR 141.85 (relating to public education and supplemental monitoring and mitigation requirements).

13. Under Section 65.58 of the Commission’s regulations, 52 Pa. Code § 65.58, an entity’s pro forma tariff or tariff supplement containing the proposed changes necessary to implement the entity’s LSLR program must address:

(a) The LSLR program’s annual cap on the number of customer-owned LSLs that can be replaced annually;

(b) The demarcation of service lines;

(c) The specifications for, and prohibitions upon, partial LSLRs;

(d) The provision of reimbursements to eligible customers or property owners who replaced their LSL within 1 year before or from LSLR project commencement; and

(e) The provision of a warranty on LSLR work performed by the entity or its contractor of a term of not less than 2 years.

14. Under Section 53.52(a) of the Commission’s regulations, 52 Pa. Code § 53.52(a), whenever a public utility files a tariff, revision or supplement effecting changes in the terms and conditions of service rendered or to be rendered, it must submit all of the following:

- (a) The specific reasons for each change.
- (b) The total number of customers served by the utility.
- (c) A calculation of the number of customers, by tariff subdivision, whose bills will be affected by the change.
- (d) The effect of the change on the utility's customers.
- (e) The direct or indirect effect of the proposed change on the utility's revenue and expenses.
- (f) The effect of the change on the service rendered by the utility.
- (g) A list of factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each. This subsection does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308 (relating to voluntary changes in rates).
- (h) Studies undertaken by the utility in order to draft its proposed change. This paragraph does not apply to a portion of a tariff change seeking a general rate increase as defined in 66 Pa.C.S. § 1308.
- (i) Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.
- (j) Plans the utility has for introducing or implementing the changes with respect to its ratepayers.
- (k) FCC, FERC or Commission orders or rulings applicable to the filing.

15. Under Section 65.64(c) of the Commission's regulations, 52 Pa. Code § 65.54(c), an entity that does not have a Commission-approved LTIP when filing its LSLR program petition must include a LSLR plan meeting the requirements of § 121.3 (relating to LTIPs). Section 121.3 of the Commission's regulations, 52 Pa. Code § 121.3 requires LTIPs to include the following information:

- (a) Identification of types and age of eligible property owned and operated by the utility for which it is seeking DSIC recovery.
- (b) An initial schedule for planned repair and replacement of eligible property.
- (c) A general description of location of eligible property.
- (d) A reasonable estimate of quantity of eligible property to be improved or repaired.
- (e) Projected annual expenditures and means to finance the expenditures.
- (f) A description of the manner in which infrastructure replacement will be accelerated and how repair, improvement or replacement will ensure and maintain adequate, efficient, safe, reliable and reasonable service to customers.
- (g) A workforce management and training program designed to ensure that the utility will have access to a qualified workforce to perform work in a cost-effective, safe and reliable manner.
- (h) A description of a utility's outreach and coordination activities with other utilities, Department of Transportation and local governments regarding the planned maintenance/construction projects and roadways that may be impacted by the LTIP.

16. VWC's LSLR Program contains all of the requirements enumerated in the Commission's regulations at 52 Pa. Code §§ 53.52(a), 65.55, 65.56, and 65.64(c) as summarized in this Petition.

II. VWC'S LEAD SERVICE LINE REPLACEMENT PROGRAM

A. BACKGROUND

17. Aqua has developed VWC's LSLR Program in accordance with Chapter 65 of the Commission's 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 in VWC's LSLR Program are VWC's LSLR Plan, 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) (related to tariff revisions) and 65.54(c) (related to LTIPs).

18. The proposed VWC LSLR Plan for 2024-2028 proposes a cap of 10 replacements per year, with a projected budget amount of approximately \$88,000 per year. This replacement rate is expected to enable the replacement of all LSLs, VWC-owned and Customer-owned, within 10 years, in accordance with the provisions of 52 Pa. Code §§ 65.53(a). While Aqua is not aware of significant LSLs in the VWC system, allowing up to 10 replacements per year will enable Aqua to address any LSLs that are discovered during its Receivership duties until the conclusion of the Section 529 Proceeding. This will allow Aqua to continue to reduce and eliminate lead throughout VWC's system, which in turn will improve the overall distribution system integrity and the health of VWC's customers and the Commonwealth overall.

B. LSLR PLAN

19. VWC's LSLR Plan contains the following elements and supporting documents as required by Section 65.56 of the Commission's regulations, 52 Pa. Code § 65.56.

1. Service Line Inventory

20. VWC's current Service Line Inventory and inventory methodology is discussed on pages 4 through 5 of its LSLR Plan and the current Service Line Inventory summary is displayed in Table 1 of the LSLR Plan.

21. The Service Line Inventory is being developed consistent with the intent and guidance of the U.S. EPA's Lead and Copper Rule Revisions,² including use of all available sources of information to establish service line material designations for each side of ownership (i.e., VWC and customer) which thus informs an overall service line material designation. To date, 16% of VWC's service line material has been identified and 19% of VWC's customer service

² On January 15, 2021, the U.S. EPA issued its Lead and Copper Rule Revisions ("LCRR"), which revised the National Primary Drinking Water Regulation for lead and copper pursuant to the Safe Drinking Water Act. The LCRR, among other things, required all water systems to create a publicly accessible LSL inventory and set forth replacement requirements. See 86 FR 4198. The compliance date for the LCRR is October 16, 2024. See 86 FR 31939.

line material has been identified using the methodologies described on pages 4 through 5 of the LSLR Plan.

22. In developing the Service Line Inventory, Aqua, as operator of the VWC system during the Receivership, has used evidence-based data, including field observations, and will verify the information provided by VWC.

23. When evidence-based data is not available, Aqua assigns 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. In addition, for galvanized service lines which were downstream from LSLs and/or lines which Aqua cannot prove were never downstream from an LSL or lead gooseneck, those lines are assigned a Galvanized Requiring Replacement (“GRR”) designation and are considered candidates for replacement.

24. Table 1 of the LSLR Plan shows total material type identification across VWC’s service territory and is reproduced below:

Material Type	VWC	Customer
Lead	0	0
GRR	1	4
Non-lead	39	45
Lead status unknown	206	197
Total	246	246

25. Aqua will update VWC’s Service Line Inventory as progress is made on completing the inventory and if any new water systems are acquired by VWC. Aqua does not anticipate that VWC will acquire any other water systems during the pendency of Aqua’s Receivership.

2. LSLR Planning and Replacements

a. VWCs Projected Annual Investment and Sources of Financing

26. Aqua’s projected annual investment and sources of financing are provided on pages 5 through 6 of its LSLR Plan.

27. While Aqua will replace lead service lines if found during an emergency repair, Aqua does not anticipate significant LSLR activities in VWC’s service territory. However, to allow Aqua to replace LSLs if they are discovered, Aqua proposes a cap of up to 10 replacements annually in the VWC system.

28. Anticipated sources of financing for the replacements will include cash on hand and short term debt of Aqua that will be booked under deferred accounting and recovered after the final determination of ownership in the Section 529 Proceeding, in accordance with the terms of the Receivership.

b. VWC’s Projected LSLRs Per Calendar Year and Description of Projection Development

29. Aqua is projecting the following replacements during the term of the LSLR Plan, as set forth in Table 2 of the LSLR Plan:

2024	2025	2026	2027	2028
10	10	10	10	10
\$88,000	\$88,000	\$88,000	\$88,000	\$88,000

30. VWC has a total of 246 VWC service lines and 246 customer service lines. Of those totals, VWC currently has 206 company-owned service lines which are identified as lead status unknown. VWC’s inventory identifies 197 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.

31. These numbers are subject to change as Aqua continues to develop VWC's inventory and can change based on evolving regulatory requirements. The projections for 2024-2028 are consistent with Aqua's proposed annual cap for the VWC system in the LSLR Plan.

c. Prioritization Criteria

32. The prioritization criteria are explained on page 6 of the LSLR Plan.

33. For individual properties, Aqua considered the following prioritization criteria when developing the LSLR Plan: (1) emergency repairs revealing LSLs; (2) homes with elevated lead concentrations in tap samples; (3) schools and licensed day care facilities; and (4) homeowners that request replacements.

d. Processes and Procedures to Address Emergency Repairs and Replacements Which Reveal LSLs

34. The processes and procedures to address emergency repairs and replacements which reveal LSLs are discussed on pages 6 through 7 of the LSLR Plan.

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

36. When Aqua uncovers an LSL while completing emergency repairs to the VWC system, and the LSL is VWC-owned, Aqua will replace the VWC 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, Aqua will complete the VWC-side replacement and restore service to the property. Aqua 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, Aqua will neither make the connection nor restore service, and Aqua will provide the resident with the information and materials in Section II.B.6 of the LSLR Plan and immediately coordinate and prioritize replacement of the customer LSL.

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

37. The processes and procedures to obtain acceptance of a LSLR prior to project commencement when the customer is and is not the property owner are addressed on pages 7 through 8 of the LSLR Plan.

38. If main replacements are required, Aqua or its third-party representatives will send letters to customers to request authorization to gain access to a structure to review the material type of the customer's service line.

39. Aqua personnel or Aqua's third-party vendor will visit each customer premise with an unknown service line material in a main replacement project to identify material type of the customer service line. Aqua will also be developing additional survey materials to engage customers/residents to assist Aqua in completing the VWC Service Line Inventory.

40. If Aqua uncovers a VWC LSL or a customer LSL during maintenance or construction activities, Aqua will provide a form 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 via phone to follow up with further information. If there is no response to the investigation letter or form, Aqua will follow the provisions of Section II.B.5 of the LSLR Plan detailing further contact attempts to be made and, if necessary, shut-off procedures.

41. After making contact with the resident and identifying the presence of a customer LSL, 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 Aqua will provide the information and materials in Section II.B.6 of the LSLR Plan. If the resident/customer is the owner and refuses to participate in the replacement, Aqua will follow the provisions of Section II.B.10 of the LSLR Plan. If the resident is not the property owner, Aqua 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").

42. If Aqua does not receive a response to telephone calls to the owner, Aqua will send a letter to the property owner explaining the program and request that the property owner contact Aqua. If the property owner does not respond, Aqua 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 Aqua's discretion, using Step In Rights as described in Section II.B.10 of the LSLR Plan. If Aqua has not received acceptance after multiple efforts to contact the property owner and obtain the Replacement Agreement, Aqua will initiate the 10-day shut-off process.

f. Processes and Procedures Based on Acceptance of a LSLR

43. The processes and procedures based on the acceptance of a LSLR are contained on pages 8 through 9 of the LSLR Plan.

44. If the customer or property owner expresses that they want to participate in VWC's LSLR Program after their service line has been identified as lead, Aqua will provide pertinent information to the customer including: (1) the Customer Lead/Galvanized Service Line Replacement Agreement and postage-prepaid and pre-addressed envelope to Aqua; (2) the Lead

Fact Sheet providing educational information about lead in drinking water; (3) Information Sheet explaining the Lead Service Line Replacement Program; (5) post-COLSL replacement flushing instructions; and (6) pitcher filter with six months of replacement cartridges.

45. The Replacement Agreement allows a third-party licensed professional to enter the property and complete the LSLR. The agreement authorizes the utility and the contractor performing the work to access the customer/property owner's property, confirms the ownership of the service line following installation, and provides a warranty on the work completed. Further, the Replacement 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.

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

47. In closing out the project, Aqua will provide a letter to the customer 3-6 months post-replacement confirming that the newly installed customer service line has been transferred back to the customer/property owner and confirming the warranty for the completed work. Aqua will also offer to provide sampling materials for post-replacement 5th liter sampling, in compliance with EPA requirements.

g. Lead/Material Recycling and Disposal Efforts

48. The lead and material recycling and disposal efforts are discussed on page 9 of the LSLR Plan.

49. When a customer LSLR occurs, Aqua's vendors will 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 will be provided to Aqua of the recycled material removed by the vendors.

50. For VWC side LSL replacements, Aqua will 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. Any lead material removed during a VWC side LSL replacement will be brought back to Aqua's division office and put in Aqua's recycling containers to be taken to the recycling center. The scrap metal that is recycled will be charged to a deferred regulatory asset.

h. Industry Accepted Practices

51. Aqua's commitment to adhere to industry accepted practices in the replacement of service lines, both VWC- and customer-owned, is explained on page 9 of the LSLR Plan.

52. Aqua, in administering VWC's LSLR Program, will adhere to the provisions of VWC's tariff regarding replacement of VWC service lines. In addition, Aqua will require Aqua personnel and its contractors to comply with any applicable plumbing codes related to customer-side service line replacement. Aqua will follow Commission regulations regarding LSLRs including prevention of partial service line replacements and termination of service provisions, as needed to prevent partial LSL replacements.

i. Integration of Acquired Systems in the LSLR Plan

53. Aqua's procedures to integrate acquired systems into the LSLR Plan are detailed on pages 9 through 10 of the LSLR Plan.

54. Aqua does not foresee VWC acquiring any additional water systems while it is operating the VWC system under the Receivership. If VWC acquires a water system prior to the deadline for water systems to complete their Service Line Inventories, Aqua will take over the water system's efforts, if any, to identify and incorporate the service line materials of the system

into VWC's overall Service Line Inventory. This will include the efforts described in Section II.A of the LSLR Plan.

55. In the event that any water systems are acquired by VWC after the deadline to complete Service Line Inventories, Aqua will incorporate the acquired system's completed inventory into the VWC's Service Line Inventory.

j. Procedure Regarding Refusal of Offer to Replace a LSL

56. The procedure regarding refusal of the offer to replace a COLSL is detailed on page 10 of the LSLR Plan.

57. During a LSLR project, if the resident/property owner refuses to replace a LSL, and Aqua has either made contact with the resident/property owner and they refuse, or where the resident/property owner is non-responsive to requests to replace the customer LSL, 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 Aqua provides the 10-day shut off notice to the customer (either through delivery or posting at the customer's premises), Aqua will also provide the Customer Refusal Letter, the Lead Fact Sheet describing the health hazards of lead service lines, and the Lead Service Line Program Information Sheet, which explains the requirements for reimbursement and the potential for termination of service.

58. Aqua's representatives will include notes within Aqua's 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 customer LSL or does not respond.

59. As described in Paragraph 42, in certain circumstances and in Aqua's sole discretion, Aqua may use Step In Rights, where it is in the public interest and would avoid termination of service to a customer that is not the property owner.

3. Communications, Outreach, and Education.

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

a. Printed and Broadcast Materials

61. A full list of all printed and broadcast materials Aqua plans on distributing to further the COLSL replacement efforts are included in pages 10 through 11 of the LSLR Plan, and copies of the material are attached as Exhibits to the LSLR Plan. These materials may change or be updated from time to time as the LSLR Program evolves.

b. Aqua's Website

62. Information regarding the portion of Aqua's website that houses information related to its LSLR Program³ is located on pages 11 and 12 of the LSLR Plan. Instead of developing a website specific to VWC's system, Aqua is proposing to incorporate information on VWC's LSLR Program on Aqua's website.

63. Aqua's website provides information on sources of lead, the health effects of lead, Aqua'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, flushing instructions post-replacement, a video showing how to take a sample with the sample bottles provided by Aqua, and reimbursement requirements.

64. Aqua is currently developing an online tool to show service line material which will be available on Aqua's publicly facing website. This tool is projected to be completed in the third quarter of 2024 and will include information related to VWC.

³ Available at <https://www.aquawater.com/about-water/water-quality/lead.php>.

65. Aqua is also developing an online tool that will show the replacement schedule by geographical location, six months into the future. Aqua is proposing the incorporate information related to VWC within this online tool. The 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 and show the material type of the service line, if known.

C. PRO FORMA TARIFF SUPPLEMENT

66. VWC's pro forma tariff supplement containing the proposed changes necessary to implement the LSLR Program contains the following elements as required by Section 65.58 of the Commission's regulations, 52 Pa. Code § 65.58 and is attached to this Petition as **Exhibit B**.

1. The LSLR Program's Annual Cap On The Number Of Customer-Owned LSLs That Can Be Replaced Annually

67. VWC's pro forma tariff supplement states that up to 10 COLSLs will be replaced per year under the LSLR Program.

2. The Demarcation of Service Lines

68. VWC's pro forma tariff supplement specifies that the Customer's service line extends from the curb, property line or utility connection to the utility's water meter or, if the utility's water meter is located outside of the structure or water is not metered by the utility, at the first shutoff valve located within the interior of the structure.

3. The Specifications For Partial LSLRs

69. VWC's pro forma tariff supplement specifies that no customer or property owner may install a partial LSL and that a partial LSL will result in termination of service until such time as the utility can replace the utility-owned LSL.

70. In addition, the supplement requires that a customer, or property owner where the customer is not the property owner, who elects to replace the COLSL themselves, must replace the COLSL concurrent with the utility replacing the utility-owned LSL, provided that the customer or property owner shall provide at least 90 days' notice prior to replacing the COLSL.

4. The Provision Of Reimbursements To Eligible Customers Or Property Owners Who Replaced Their LSL Within 1 Year Before Or From LSLR Project Commencement

71. Aqua's pro forma tariff supplement provides for the reimbursement of eligible customers or property owners, if the customer is not the property owner, who replaced their LSL within 1 year before or after the commencement of a LSLR Project. The online tool, described in Paragraphs 64 and 65, above, will allow customers/property owners to determine if they are within the required radius of an LSLR Project.

5. The Provision Of A Warranty On LSLR Work Performed By The Entity Or Its Contractor Of A Term Of Not Less Than 2 Years

72. VWC's pro forma tariff supplement provides a two-year warranty to the customer or property owner, if the customer is not the property owner, on the workmanship and materials of the LSLR and the restoration of surfaces. The two-year warranty begins upon the re-establishment of water service to the property after the LSLR has occurred.

D. REQUIREMENTS OF SECTIONS 53.52(a) AND 65.54(c) OF THE COMMISSION'S REGULATIONS

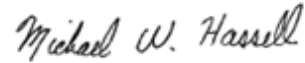
73. Aqua has provided the information and supporting data required by 52 Pa. Code § 53.52(a), related to revisions and supplements to VWC's tariff, which is included in **Exhibit C** to this Petition.

74. In addition, Aqua has provided the information and supporting data regarding the requirements of 52 Pa. Code § 121.3, submitted as supporting data in accordance with 52 Pa. Code § 65.54(c), which is included in **Exhibit C** to this Petition.

III. CONCLUSION

WHEREFORE, Aqua Pennsylvania, Inc., as Receiver for Venango Water Company, respectfully requests that the Pennsylvania Public Utility Commission approve Venango Water Company's Lead Service Line Replacement Program, finding that it contains all the necessary items identified in 52 Pa. Code §§ 53.52(a) and 65.51 et seq., and the Commission's Final Implementation Order entered on March 14, 2022 at Docket No. L-2020-3019521.

Respectfully submitted,



Alexander R. Stahl
Regulatory Counsel
Aqua Services, Inc.
762 W. Lancaster Avenue
Bryn Mawr, PA 19010
Phone: 610-645-1130
Email: astahl@aquaamerica.com

Of Counsel:
Post & Schell, P.C.

Dated: July 22, 2024

Michael W. Hassell
Megan E. Rulli
Post & Schell, P.C.
17 North Second Street
12th Floor
Harrisburg, PA 17101-1601
Phone: 717-612-6029
Fax: 717-731-1985
Email: mhassell@postschell.com
Email: mrulli@post.schell.com

Counsel for Aqua Pennsylvania, Inc.

EXHIBIT A

Aqua Pennsylvania, Inc.
As Receiver for
Venango Water Company

Lead Service Line Replacement Plan



TABLE OF CONTENTS

DEFINITIONS	3
I. INTRODUCTION.....	4
II. LSLR PLAN REQUIREMENTS	4
A. Service Line Inventory	4
B. Planning and Replacements	5
1. VWC’s Projected Annual Investment and Sources of Financing	5
2. VWC’s Projected LSLRs Per Calendar Year and Description of Projection Development	6
3. Prioritization Criteria.....	6
4. Processes and Procedures to Address Emergency Repairs and Replacements Which Reveal LSLs.....	6
5. Processes and Procedures to Obtain Acceptance of a LSLR Prior to Project Commencement When the Customer Is and Is Not the Property Owner	7
6. Processes and Procedures Based on Acceptance of a LSLR.....	8
7. Lead/Material Recycling and Disposal Efforts	9
8. Industry Accepted Practices	9
9. Integration of Acquired Systems in the LSLR Plan	9
10. Procedure Regarding Refusal of Offer to Replace a LSL.....	10
C. Communications, Outreach and Education	10
1. Printed and Broadcast Materials	10
2. Aqua’s Website.....	11
III. CONCLUSION	12

**Aqua Pennsylvania, Inc. as Receiver for Venango Water Company
Lead Service Line Replacement Plan**

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

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

µg/L – Micrograms per liter.

VWC – Venango Water Company

I. INTRODUCTION

Aqua Pennsylvania, Inc. (“Aqua”) has developed the following Lead Service Line Replacement (“LSLR”) Plan as the Receiver¹ for Venango Water Company (“VWC”) 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 VWC’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).

VWC is a Class C public utility that owns a water system serving approximately 246 customers in Reno, Venango County, Pennsylvania, and Aqua provides operations and management for VWC during the pending Section 529 Proceeding. VWC does not have a Long-Term Infrastructure Improvement Plan (“LTIIP”) on file with the Commission, and therefore, this LSLR Plan also includes information regarding the requirements of 52 Pa. Code § 121.3 as required by 52 Pa. Code § 65.54(c).

II. LSLR PLAN REQUIREMENTS

VWC’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., VWC and customer) which thus informs an overall service line material designation.

In developing the Service Line Inventory, Aqua, as operator of the VWC system during the Receivership, has used evidence-based data, including field observations, and will verify the information provided by VWC. Aqua has not undertaken any main replacements in the VWC system to date.

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:

¹ Receivership established by the Commission’s Ex Parte Emergency Order dated August 11, 2023, and ratified by the Commission’s Ratification Order dated August 24, 2023 at Docket No. M-2023-3042180. Aqua’s Receivership under Section 529 was consolidated in *Venango Water Company – Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. as Receiver; Section 529 Investigation of Venango Water Company; Section 529 Investigation of Sugarcreek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, Cooperstown Water Company and Blaine E. Rhodes Sewer Company*, Docket Nos. M-2023-3042180, I-2023-3042312, and P-2024-3045205, Deputy Chief Administrative Law Judge Mark A. Hoyer First Interim Order (Mar. 20, 2024) (“Section 529 Proceeding”).

Aqua Pennsylvania, Inc. as Receiver for Venango Water Company
Lead Service Line Replacement Plan

1. 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 the Lead and Copper Rule Improvements (“LCRI”) which as proposed currently requires a statistical analysis to ensure the veracity of the assumption to a certain confidence level. 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.
2. For galvanized service lines which are or were downstream from lead service lines (“LSLs”) and/or Aqua 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 is continuing to develop VWC’s Service Line Inventory, including any field observations, assumptions as described above, and other evidence-based data, with 16% of VWC service line material identified and 19% of VWC customer service line material identified, detailed further below.

Aqua will update VWC’s Service Line Inventory as progress is made on completing the inventory and if any new water systems are acquired by VWC.

Table 1 below shows total material type identification in VWC’s service territory.

Table 1 – Current Service Line Inventory Summary

Material Type	VWC	Customer
Lead	0	0
GRR	1	4
Non-lead	39	45
Lead status unknown	206	197
Total	246	246

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

B. Planning and Replacements

1. VWC’s Projected Annual Investment and Sources of Financing

While Aqua will replace lead service lines if found during an emergency repair, Aqua does not anticipate significant LSLR activities in VWC. However, to allow Aqua to replace LSLs if they are discovered, Aqua proposes a cap up to 10 replacements annually in the VWC system.

**Aqua Pennsylvania, Inc. as Receiver for Venango Water Company
Lead Service Line Replacement Plan**

Anticipated sources of financing for the replacements will include cash on hand and short term debt of Aqua that will be booked under deferred accounting and recovered after the final determination of ownership in the Section 529 Proceeding.

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

The Company is proposing a cap as set forth in **Table 2**:

Table 2 – Projected Customer LSL Replacements During 2024-2028

	2024	2025	2026	2027	2028
Replacements	10	10	10	10	10
Cost	\$88,000	\$88,000	\$88,000	\$88,000	\$88,000

VWC has a total of 246 VWC service lines and 246 customer service lines. Of those totals, VWC currently has 206 company-owned service lines which are identified as lead status unknown. VWC’s inventory identifies 197 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. These numbers are subject to change as Aqua continues to develop VWC’s inventory and can change based on evolving regulatory requirements. The projections for 2024-2028 are consistent with Aqua’s proposed annual cap for the VWC system in this LSLR Plan.

3. Prioritization Criteria

Aqua 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.

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

When Aqua uncovers an LSL while completing emergency repairs to the VWC system, if both the customer side and VWC side of the service line are lead, Aqua 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 VWC and customer side. If only the customer side of the service line is lead, Aqua will similarly provide the information and materials in Section II.B.6. and prioritize the replacement of the customer LSL. Aqua 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.

Aqua Pennsylvania, Inc. as Receiver for Venango Water Company Lead Service Line Replacement Plan

When Aqua uncovers an LSL while completing emergency repairs to the VWC system, and the LSL is VWC-owned, Aqua will replace the VWC 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, Aqua will complete the VWC-side replacement and restore service to the property. Aqua 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, Aqua will neither make the connection nor restore service, and Aqua will provide the resident with the information and materials in Section II.B.6. and immediately coordinate and prioritize replacement of the customer LSL.

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

If main replacements are required, Aqua or its third-party representatives will send letters to customers to request authorization to gain access to a structure to review the material type of the customer's service line (**Exhibit A**). Aqua personnel or Aqua's third-party vendor will visit each customer premise with an unknown service line material in a main replacement project to identify material type of the customer service line. Aqua will also be developing additional survey materials to engage customers/residents to assist Aqua in completing the VWC Service Line Inventory (**Exhibit B**). If Aqua uncovers a VWC LSL or a customer LSL during maintenance or construction activities, Aqua 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 via phone to follow up with further information.

If there is no response to the 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 Aqua 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 customer LSL, 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 Aqua will provide the information and materials in Section II.B.6 below. If the resident/customer is the owner and refuses to participate in the replacement, Aqua will follow the provisions of Section II.B.10, below. If the resident is not the property owner, Aqua 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 Aqua does not receive a response to telephone calls to the owner, Aqua will send a letter to the property owner (**Exhibit G**) explaining the program and request that the property owner contact Aqua. If the property owner does not respond, Aqua will explore all

Aqua Pennsylvania, Inc. as Receiver for Venango Water Company
Lead Service Line Replacement Plan

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 Aqua's discretion, using Step In Rights as described in Section II.B.10. If Aqua has not received acceptance after multiple efforts to contact the property owner and obtain the Replacement Agreement, Aqua will initiate the 10-day shut-off process.

6. Processes and Procedures Based on Acceptance of a LSLR

If the resident or property owner expresses that they want to participate in VWC'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 Aqua (**Exhibit F**).
- Lead Fact Sheet providing educational information about lead in drinking water (**Exhibit H**).
- Information Sheet explaining VWC's Lead Service Line Replacement Program (**Exhibit I**).
- Post-COLSL replacement flushing instructions (**Exhibit J**).
- Pitcher filter with six months of replacement cartridges (**Exhibit K**).

When the above information is provided to the resident/property owner, Aqua will explain to the resident/property owner that a plumber will contact them and schedule the replacement of the customer LSL. If the resident/property owner does not return the Replacement Agreement, Aqua will contact the resident/property owner until it receives a signed copy of the Replacement Agreement, which will be retained by Aqua. If a customer has a LSL and it is uncovered in a future main replacement project, Aqua 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 Aqua 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 Replacement 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 customer LSL 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,

Aqua Pennsylvania, Inc. as Receiver for Venango Water Company
Lead Service Line Replacement Plan

or (c) a service line serving multiple properties. As these situations arise, Aqua will require documentation and, in Aqua's judgment, get the proper authorization to complete the replacement.

In closing out the project, Aqua will 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. Aqua will also offer to provide sampling materials for post replacement 5th liter sampling, in compliance with EPA requirements. If the resident agrees, Aqua will provide instructions for post-replacement 5th liter sampling (**Exhibit M**). Following 5th liter sampling, Aqua will call and mail 5th 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 VWC 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 VWC side LSL replacement will be brought back to Aqua's division office and put in Aqua's recycling containers to be taken to the recycling center. The scrap metal that is recycled will be charged to a deferred regulatory asset.

8. Industry Accepted Practices

Aqua in administering VWC's LSLR Program will adhere to the provisions of VWC's tariff regarding replacement of VWC service lines. In addition, Aqua will require Aqua personnel and its contractors to comply with any applicable plumbing codes related to customer-side service line replacement. Aqua 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

Aqua does not foresee VWC acquiring any additional water systems while it is operating the VWC system under the Receivership. If VWC acquires a water system prior to the deadline for water systems to complete their Service Line Inventories, Aqua will take over the water system's efforts, if any, to identify and incorporate the service line materials of the system in to VWC's overall Service Line Inventory. This will include the efforts described in Section II.A., above.

Aqua Pennsylvania, Inc. as Receiver for Venango Water Company Lead Service Line Replacement Plan

Again, Aqua does not foresee VWC acquiring additional water systems; however, for water systems acquired by VWC after the deadline to complete Service Line Inventories, Aqua will incorporate the acquired system's completed inventory into the VWC's Service Line Inventory.

10. Procedure Regarding Refusal of Offer to Replace a LSL

During a LSLR project, if the resident/property owner refuses to replace a LSL, and Aqua 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 customer LSL, 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 Aqua provides the 10-day shut off notice to the customer (either through delivery or posting at the customer's premises), Aqua 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 Aqua's sole discretion, Aqua may utilize Step In Rights as described in VWC's 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 Aqua has attempted to contact the property owner to replace the customer LSL, the structure is occupied by a party that is not the property owner, Aqua has attempted to get authorization to replace the customer LSL, and the property owner cannot be identified or the property owner has been notified of the offer to replace the customer LSL and has not responded.

Aqua's representatives will include notes within Aqua's 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 customer LSL or does not respond.

C. Communications, Outreach and Education

Aqua's communications activities as Receiver for VWC 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 Aqua plans on distributing under different scenarios of customer LSL replacement efforts. These materials may change or be updated from time to time.

- Exhibit A – Investigative letters to identify service line material.
- Exhibit B – Customer surveys.
- Exhibit C – Form provided to customer if Aqua discovers a LSL or GRR during construction or maintenance activities.

Aqua Pennsylvania, Inc. as Receiver for Venango Water Company Lead Service Line Replacement Plan

- Exhibit D – Door hanger placed if contact is not made with customer to identify service line material.
- 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 – Customer LSL replacement close out letter.
- Exhibit M – 5th Liter sampling instructions.
- Exhibit N – 5th 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

Aqua currently has developed a section of its website that houses information related to Lead and Aqua's LSLR Program. Instead of developing a website specific to VWC's system, Aqua is proposing to incorporate information on VWC's LSLR Program on Aqua's website.

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

Aqua's website provides information on sources of lead, the health effects of lead, Aqua'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, flushing instructions post-replacement, a video showing how to take a sample with the sample bottles provided by Aqua, and reimbursement requirements.

Aqua Pennsylvania, Inc. as Receiver for Venango Water Company Lead Service Line Replacement Plan

Aqua is currently developing an online tool to show service line material which will be available on Aqua's publicly facing website. This tool will be available is projected to be completed in the third quarter of 2024 and will include information related to VWC.

Aqua is also developing an online tool that will 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. Aqua is proposing the incorporate information related to VWC within this online tool. The 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.

III. CONCLUSION

Aqua, as Receiver for the VWC system, will continue to develop VWC's Service Line Inventory and replace customer LSLs in accordance with this LSLR Plan and work toward the goal of removing all LSLs from VWC's system. VWC's LSLR Plan will be updated as needed.

EXHIBIT A

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



An Essential Utilities Company

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 ERM Call Center (484) 913-0346 between the hours of 8am-6pm to schedule an appointment. Please state that you are calling about the Aqua PA Priority Customer 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.)



First Name: [] [] [] [] [] [] [] [] [] []

Last Name: [] [] [] [] [] [] [] [] [] [] [] [] [] [] [] []

Phone: []

Year home built: []

If known, what type of material is the service line coming into you home? Please provide a picture for verification via email to LeadSurvey@erm.com 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 (484) 913-0346 to verify**

Water Pipe and Service Line Material Identification

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

Please return completed survey in the enclosed self-address envelope to ERM c/o Melissa Marchisello, AQUA Pennsylvania PO Box 950 Lansdale, PA 19446-9802



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.

Lead is dull, very soft, and will turn a shiny silver color when scratched.

TO HOME WATER METER FROM STREET

Magnets will ONLY stick to steel. They will NOT stick to lead or copper.

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
ERM c/o Melissa Marchisello, AQUA Pennsylvania
PO Box 950
Lansdale, PA 19446-9802

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>1  If possible, remove faucet aerators from all water faucets in the home.</p> | <p>2 Beginning in the lowest level of the home, fully open the cold water faucets throughout the home.</p> | <p>3 Let the water run for at least 30 minutes at the last faucet you opened (which was on your top floor).</p> |
| <p>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.</p> | <p>5 Clean and reinstall any aerators you might have removed in Step 1.</p> | <p>6 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.

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.

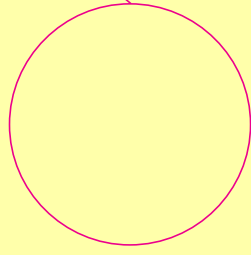
If your home's water shows elevated levels of lead, or if you are concerned about the potential of lead in your water, here are ways you can minimize exposure.

- **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.
- 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.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 or contact your healthcare provider.

EXHIBIT D

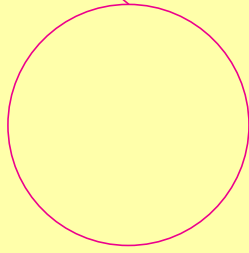
Door Hanger



IMPORTANT NOTICE

AQUASM

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

AQUASM

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

ESTE DOCUMENTO CONTIENE INFORMACIÓN IMPORTANTE ACERCA DE SU AGUA POTABLE. HAGA QUE ALGUIEN LO TRADUZCA PARA USTED, O HABLE CON ALGUIEN QUE LO ENTIENDA.

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 valid until the Company or its contractor/subcontractor completes the replacement of the Customer-side service line and restoration.

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



An  Essential Utilities Company

Aqua Wants Our Customers to Be Informed*

Este documento contiene información importante acerca de su agua potable. Haga que alguien lo traduzca para usted, o hable con alguien que lo entienda.

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.aquawater.com/about-water/water-quality/lead.php> for more information.



Call us at 877.987.2782 for more information.



You can find your community's water quality report at AquaWater.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. Disturbing a service line that contains lead, including the replacement of your lead service line, could result in temporary elevated lead levels in your drinking water.

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:

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.

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 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.

EXHIBIT H

Lead Fact Sheet



An  Essential Utilities Company

Aqua Wants Our Customers to Be Informed*

Este documento contiene información importante acerca de su agua potable. Haga que alguien lo traduzca para usted, o hable con alguien que lo entienda.

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.aquawater.com/about-water/water-quality/lead.php> for more information.



Call us at 877.987.2782 for more information.



You can find your community's water quality report at AquaWater.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. Disturbing a service line that contains lead, including the replacement of your lead service line, could result in temporary elevated lead levels in your drinking water.

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:

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.

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 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.

*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 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**¹ 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.

¹Based 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 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.

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]

ESTE DOCUMENTO CONTIENE INFORMACIÓN IMPORTANTE ACERCA DE SU AGUA POTABLE. HAGA QUE ALGUIEN LO TRADUZCA PARA USTED, O HABLE CON ALGUIEN QUE LO ENTIENDA.

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

5th 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

5th Liter Sample Results Letter



ESTE DOCUMENTO CONTIENE INFORMACIÓN IMPORTANTE ACERCA DE SU AGUA POTABLE. HAGA QUE ALGUIEN LO TRADUZCA PARA USTED, O HABLE CON ALGUIEN QUE LO ENTIENDA.

Date

Name
Address

Dear [NAME] :

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

	<i>1st Liter</i>	<i>5th Liter</i>
LEAD RESULT	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 either (1) attempted to contact you to review your service line material to determine if your service line is lead or galvanized requiring replacement, or (2) your service line has been determined to be lead or galvanized requiring replacement and you have refused to allow Aqua to replace the service line or Aqua has not received a response from you regarding the replacement of your service line.

Aqua must be allowed access to review the service line material and/or replace the 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 (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 for Aqua or its representatives to review you service line material or 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



An Essential Utilities Company

Aqua Wants Our Customers to Be Informed*

Este documento contiene información importante acerca de su agua potable. Haga que alguien lo traduzca para usted, o hable con alguien que lo entienda.

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.aquawater.com/about-water/water-quality/lead.php> for more information.



Call us at 877.987.2782 for more information.



You can find your community's water quality report at AquaWater.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. Disturbing a service line that contains lead, including the replacement of your lead service line, could result in temporary elevated lead levels in your drinking water.

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:

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.

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 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.

*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.

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 WATER¹

[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

¹ 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.

approved to reduce lead or contact NSF International (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
Lead	ug/L	15 ug/L
Copper	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:¹

- **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.

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

- **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) 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:¹

- **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) 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.

¹ 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.

- **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:¹

- **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) 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.

¹ 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.

- **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:¹

- **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) for information on

¹ 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.

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
Outer Appearance	Dull gray, bendable; Often curves between wall/floor and valve	Dark gray or black; Straight rigid pipe	Brown; Can have green corrosion spots
Threads at connections	None	Yes	None
Scratch Test (coin or key)	Shiny silver	Hard to scratch, remains gray	Copper, like a penny
Magnet Test	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.

Lead is dull, very soft, and will turn a shiny silver color when scratched.

TO HOME WATER METER FROM STREET

Magnets will ONLY stick to steel. They will NOT stick to lead or copper.

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.

-  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).

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)




¡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*



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.

-  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.

[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) 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 WATER¹

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.

¹ 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) 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 for more information or follow Aqua on Facebook at 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.

#

EXHIBIT B

Supplement No. 25
To
Water - Pa. P.U.C. No. 3

VENANGO WATER COMPANY
RATES, RULES AND REGULATIONS GOVERNING
THE PROVISION OF WATER SERVICE
TO THE PUBLIC IN A PORTION OF
SUGARCREEK BOROUGH,
INCLUDING THE VILLAGE OF RENO,
VENANGO COUNTY, PENNSYLVANIA

ISSUED: July 22, 2024

EFFECTIVE: September 20, 2024

BY: Marc A. Lucca
President
Aqua Pennsylvania, Inc.
762 W. Lancaster Ave.
Bryn Mawr, PA 19010

AS RECEIVER FOR:
Venango Water Company
Randall L. Rhodes, Secretary
P.O. Box 397
Reno, PA 16343

NOTICE

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

Venango Water Company	Supplement No. 25 To Water - Pa. P.U.C. No. 3 Page No. 2
-----------------------	---

LIST OF CHANGES

Supplement No. 25 to Water - Pa. P.U.C. No. 3 modifies the customer service line rules (Section 4.C.) in compliance with 52 Pa. Code § 65.51 et seq. by adding Rule 4.19.

TABLE OF CONTENTS

	Page No.
Title Page	1
List of Changes	2
Table of Contents	3 15 th Revised (C)
Schedule of Rates	
Metered Rates	4 15 th Revised (C)
Private Fire Protection	5 15 th Revised (C)
 Rules and Regulations	
Definition of Terms	6 Original
Definition of Terms, cont.	7 Original
Definition of Terms, cont.	8 Original
Service Area	9 Original
Description of Service	10 Original
Service Connections	11 Original
Service Connections, cont.	12 Original
Service Connections, cont.	13 Original
Service Connections, cont.	14 Original
Service Connections, cont.	14.a. Original (C)
Service Connections, cont.	14.b. Original (C)
Service Connections, cont.	14.c. Original (C)
Service Connections, cont.	14.d. Original (C)
Application for Service	15 Original
Meters	16 Original
Meters, cont.	17 Original
Meters, cont.	18 Original
Discontinuance of Service	19 Original
Discontinuance of Service, cont.	20 1 st Revised
Deposits	21 Original
Notices	22 Original
Reserved	23 Original
Bills Due and Payment	24 Original
Temporary Service	25 Original
Cross Connections	26 Original
Frozen Service Lines	26 Original
Regulation of Quantity of Water	26 Original
Fire Protection	27 Original
Responsibility for Equipment	28 Original
Access to Premises	29 Original
Interruptions in Service	30 Original
Water Conservation Contingency Plan	31 Original
Water Conservation Contingency Plan, cont.	32 Original
Reserved	33 Original
Extension for Service	34 Original
Extension for Service, cont.	35 Original
Extension for Service, cont.	36 Original
Extension for Service, cont.	37 Original
Lead Ban Compliance	38 Original
Lead Ban Compliance	39 Original

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

4.19 Customer Owned Lead Service Lines

Aqua Pennsylvania, Inc. ("Aqua") as Receiver for the Utility shall perform lead service line replacement ("LSLR") activities in accordance with VWC's LSLR Plan.

Notwithstanding Rule 4.15, the Utility (or contractors employed by the Utility) shall replace Customer Owned Lead Service Lines ("COLSLs") pursuant to the Utility'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 ("LSL") if it ever was or is currently downstream of any LSL or service line of unknown material.

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

The Utility will replace up to 10 COLSLs per year under the Utility's Replacement Program. If reimbursements would cause the Utility to exceed its current annual cap, the Utility 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 Utility 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 Utility can replace the Utility-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 Utility replacing the Utility-owned LSL, provided that the customer or property owner shall provide the Utility at least 90 days' notice prior to replacing the COLSL.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

The Utility 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 Utility'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 Utility (or its contractor) complete the COLSL replacement. Upon completion, service will be established or restored to the property.

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

Step In Rights

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

- a. The Utility has attempted to contact the property owner with an offer to replace the COLSL in accordance with the Utility's LSLR Plan.
- b. The Customer or the occupier of the Property is not the property owner.
- c. The Utility 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 Utility's offer to replace the COLSL.

In these circumstances, the Utility may, in its discretion, replace the COLSL in accordance with the Utility'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 Utility exercises Step In Rights, the Utility, 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.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Reimbursements

The Utility 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 LSLR Project. A LSLR Project shall be defined as a Utility scheduled LSL 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 LSL replacement within a LSLR project area. LSLR Project Area shall be defined as the area encompassing the Utility's scheduled LSLR activities, which includes the area within a 1-mile radius of a LSLR Project, if that area is served by the Utility.

Reimbursements to customers or property owners, if the customer is not the property owner, require that the customer or property owner provides the Utility with a paid invoice, a certification or verified statement from a certified plumber, and other documentation required by the Utility, in its sole discretion, to verify the replacement. Failure to provide sufficient information will result in no reimbursement being paid. The Utility shall reimburse eligible customers or property owners up to 125% of the average costs of the Utility's LSLRs, not to exceed the actual cost incurred by the customer to replace their LSL. The average cost of the Utility's LSLRs in any year will be determined by the average cost of the Utility's 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 Utility. 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.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Warranty

The Utility (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 Utility 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 the Utility or its contractor to access the property and complete the repair as needed.

EXHIBIT C

Please find the following information submitted as supporting data in accordance with 52 Pa. Code § 53.52(a):

1. The specific reasons for each change.

Aqua Pennsylvania, Inc. (“Aqua”) is filing this proposed tariff change on behalf of Venango Water Company (“VWC”) as Receiver to comply with the Commission’s regulations under Act 120 of 2018 (“Act 120”) at 52 Pa. Code § 65.51 et seq.

2. The total number of customers served by the utility.

As of July 16, 2024, the VWC served 246 customers.

3. A calculation of the number of customers, by tariff subdivision, whose bill will be affected by the change:

No immediate effect will occur to VWC customers’ bills from the change; however, if Aqua is required to acquire the VWC system at the conclusion of the Section 529 Proceeding, all VWC customers’ bills will be affected by the change.

4. The effect of the change on the utility’s customers.

Customers that have lead service lines will have the opportunity to have Aqua, or its contractors, replace their customer lead service line at no direct cost to that customer. Additionally, customers that have replaced their LSLs, may be eligible for reimbursement of those costs.

5. The direct or indirect effect of the proposed change on the utility’s revenue and expenses.

Under Act 120, the costs associated with the LSLR Program are recovered through VWC’s base rates – VWC does not have a Distribution System Improvement Charge. If Aqua is required to acquire the VWC system, any costs of replacement will be recovered through base rates through a claim made under deferred accounting established in the Section 529 Proceeding. Table 2 of VWC’s LSLR Plan shows the projected costs of LSLR activities.

6. The effect of the change on the service rendered by the utility.

Through the LSLR Program for VWC, Aqua will be working to eliminate customer LSLs across VWC’s footprint, and thereby reducing customer exposure to lead. Aqua does not anticipate any other significant effect on the service rendered by Aqua on behalf of VWC.

7. All factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each.

Aqua considered the following factors in its determination to make the proposed change in the tariff, they are as follows:

- (a) VWC is required to comply with Act 120 and the Commission's regulations which require that VWC submit a LSLR Program in accordance with the Commission's regulations within two years of the effective date of the Commission's lead regulations. Aqua, as Receiver of VWC, is responsible to ensure compliance.
- (b) Reducing and eliminating lead service lines throughout the VWC's system.

These factors were chosen because they are regulatory requirements, and they will improve overall system integrity and the health of VWC's customers and the Commonwealth overall.

8. Studies undertaken by the utility in order to specifically address the proposed changes.

Aqua did not undertake a study to specifically address the proposed changes.

9. Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.

While Aqua has not taken a formal poll with respect to VWC customer acceptance and desire for the proposed change, Aqua has already been replacing customer-owned lead service lines in Aqua's service area and customers that have participated were generally supportive of this program.

10. Plans the utility has for introducing or implementing the changes with respect to its ratepayers.

Aqua has included in its LSLR Program for VWC various communications and outreach documents as required by the Commission's regulations. Please see the VWC LSLR Plan.

11. FCC, FERC, or Commission orders or rulings applicable to the filing.

Please refer to the Commission's Order entered March 14, 2022, at Docket No. L-2020-3019521 regarding the implementation of Act 120.

Please find the following information regarding the requirements of 52 Pa. Code § 121.3 submitted as supporting data in accordance with 52 Pa. Code § 65.54(c):

(a) A utility seeking to implement a DSIC mechanism or to continue a previously-approved DSIC mechanism shall file an LTIP. The LTIP must include the following elements:

(1) Identification of types and age of eligible property owned and operated by the utility for which it is seeking DSIC recovery.

The property under the LSLR Plan that will be replaced is customer owned lead service lines. Aqua does not have exact ages of service lines in the VWC system; however, a review of VWC's most recent base rate case in 2018 shows installation of certain service lines and mains to curb in the 1970s.

(2) An initial schedule for planned repair and replacement of eligible property.

Please see Table 2 of the LSLR Plan.

(3) A general description of location of eligible property.

All property to be replaced is in Sugarcreek Borough, Venango County, PA.

(4) A reasonable estimate of quantity of eligible property to be improved or repaired.

Aqua is developing the service line inventory as Receiver, but has requested a cap of up to 10 replacements per year to allow for LSLs to be replaced as they are discovered.

(5) Projected annual expenditures and means to finance the expenditures.

Please see Table 2 of the LSLR Plan. Aqua will use cash on hand, and short term debt to finance any replacements that occur in the VWC system.

(6) A description of the manner in which infrastructure replacement will be accelerated and how repair, improvement or replacement will ensure and maintain adequate, efficient, safe, reliable and reasonable service to customers.

Aqua will replace customer LSLs as they are discovered while Receiver of the VWC system. Replacement of customer LSLs will reduce customer exposure to lead which will help ensure adequate, efficient, safe, reliable and reasonable service to customers.

- (7) A workforce management and training program designed to ensure that the utility will have access to a qualified workforce to perform work in a cost-effective, safe and reliable manner.**

Please see the information regarding Aqua's workforce management and training included in Aqua's LTIP on file with the Commission, which demonstrates that Aqua has access to a qualified workforce to undertake LSLR in VWC's system.

- (8) A description of a utility's outreach and coordination activities with other utilities, Department of Transportation and local governments regarding the planned maintenance/construction projects and roadways that may be impacted by the LTIP.**

Please see the information included in Aqua's LTIP on file with the Commission. Aqua will implement these outreach and coordination activities with respect to LSLRs in the VWC system.

- (b) The LTIP must address only the specific property eligible for DSIC recovery.**

The specific property to be replaced are customer owned lead service lines.

VERIFICATION

I, Todd M. Duerr, Vice President of Operations of Aqua Pennsylvania, Inc., hereby state that the facts set forth in Venango Water Company's Lead Service Line Replacement Program 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 black ink that reads "Todd Duerr". The signature is written in a cursive style and is positioned above a solid horizontal line.

Todd M. Duerr
Vice President of Operations
Aqua Pennsylvania, Inc.

Dated: July 22, 2024