



Erin K. Fure
Director, Corporate Counsel
852 Wesley Drive | Mechanicsburg, PA 17055
Phone: 717-550-1556 | Fax: 717-550-1255
erin.fure@amwater.com

VIA eFiling

July 22, 2024

Rosemary Chiavetta, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: Petition of Pennsylvania-American Water Company for Approval of a Lead Service Line Replacement Program, Related Tariff Changes, and Modification of Long-Term Infrastructure Improvement Plan

Docket No. P-2024-_____

Dear Secretary Chiavetta:

Pennsylvania-American Water Company ("PAWC") is filing the enclosed Petition seeking approval of its Lead Service Line Replacement Program pursuant to recently enacted 52 Pa. Code §§ 65.51, *et seq.* ("Petition). The Petition includes the following:

- Exhibit A Lead Service Line Replacement Plan
 - Appendix 1 – Service Line Inventory
 - Appendix 2 – DEP Guidance: Initial Service Line Inventory Sufficient Evidence for Non-Lead – Training Aid
 - Appendix 3 – Communications, Outreach, and Education
- Exhibit B *Pro Forma* Tariff Supplement
- Exhibit C PAWC Current Tariff - Definitions
- Exhibit D Supporting Data Required by 52 Pa. Code § 53.52(a)
- Exhibit E Modified Long-Term Infrastructure Improvement Plan

Concurrently with the enclosed filing, PAWC is filing under separate cover, PAWC's Water Long-Term Infrastructure Improvement Plan II, dated September 1, 2021, Revised October 20, 2021, Second Revision July 22, 2024.

A copy of the Petition has been served upon the parties listed on the enclosed Certificate of Service.

Should you have any questions concerning this filing, please contact me.

Sincerely,

Erin K. Fure

Enclosure

cc: Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PETITION OF PENNSYLVANIA-AMERICAN WATER COMPANY FOR APPROVAL OF A LEAD SERVICE LINE REPLACEMENT PROGRAM, RELATED TARIFF CHANGES, AND MODIFICATION OF LONG-TERM INFRASTRUCTURE IMPROVEMENT PLAN :
: **DOCKET NO. P-2024-** _____
:

**PETITION OF PENNSYLVANIA-AMERICAN WATER COMPANY
FOR APPROVAL OF A LEAD SERVICE LINE REPLACEMENT PROGRAM,
RELATED TARIFF CHANGES, AND MODIFICATION OF
LONG-TERM INFRASTRUCTURE IMPROVEMENT PLAN**

Pursuant to Section 1311(b)(2) of the Pennsylvania Public Utility Code (“Code”), 66 Pa. C.S. § 1311(b), and 52 Pa. Code §§ 65.51 *et seq.*, Pennsylvania-American Water Company (“PAWC” or the “Company”) hereby files this Petition seeking the approval of the Pennsylvania Public Utility Commission (“Commission”) of (1) PAWC’s Lead Service Line Replacement Program (“LSLR Program”) to replace Company-owned lead service lines (“LSLs”) as well as customer-owned LSLs and to recover the associated costs related to those replacements pursuant to Act 120 of 2018 (“Act 120”), (2) related tariff changes, and (3) modifications to its Long-Term Infrastructure Improvement Plan (“LTIIIP”). In support thereof, PAWC submits the following:

I. INTRODUCTION AND BACKGROUND

1. PAWC is a Class A Pennsylvania public utility that, as of June 30, 2024, provided service to approximately 685,334 water and 98,047 wastewater customers in approximately 417 communities located in 37 counties in Pennsylvania. As a Pennsylvania public utility, the Company is subject to the regulatory authority of the Commission. In addition, the Company must comply with drinking water, environmental and other operational standards established by the

Pennsylvania Department of Environmental Protection (“DEP”) and the federal Environmental Protection Agency (“EPA”).

2. The name and address of PAWC’s attorney authorized to receive all notices and communications regarding this filing is as follows:

Erin K. Fure, Esquire
Pennsylvania-American Water Company
852 Wesley Drive, Mechanicsburg, PA 17055
Telephone: (717) 550-1556
E-Mail: erin.fure@amwater.com

3. Act 120, which was signed into law on October 24, 2018, amended Section 1311(b) of the Code to address replacement of LSLs and damaged wastewater sewer laterals (“DWSLs”) as well as the recovery of costs associated with such replacement.

4. On March 14, 2022, the Commission entered the Final Rulemaking Order, at Docket No. L-2020-3019521 (“Final Rulemaking Order”), which adopts the Commission’s regulations concerning LSL replacement (“LSLR”) at 52 Pa. Code §§ 65.51 *et seq.* (“LSLR Regulations”), which became effective on July 23, 2022.

5. Pursuant to 52 Pa. Code § 65.53(a), a Class A public utility shall remove and replace all LSLs, whether entity-owned or customer-owned, within or connected to its water distribution systems within 25 years from the effective date of the LSLR Regulations.

6. Commission regulations, 52 Pa. Code § 65.61, direct that an entity which received prior Commission approval to perform LSLR activities shall submit for Commission approval and file under 52 Pa. Code § 65.55(b) a LSLR program “no later than the effective date of the rates established under the entity’s next base rate case filed following the effective date of this section or within 2 years of the effective date of this section, whichever comes first.”

7. By Order entered on October 3, 2019 at Docket No. P-2017-2606100, the Commission previously granted PAWC approval to perform LSLR activities.

8. PAWC's Petition provides a summary of the key elements of PAWC's LSLR Program, including its LSLR Plan. As explained herein, PAWC's LSLR Program includes the elements required by Section 1311(b) and the LSLR Regulations.

II. LEAD SERVICE LINE REPLACEMENT PROGRAM

9. Pursuant to 52 Pa. Code § 65.54, an entity that has a Commission-approved LTIP shall include with its LSLR program petition a modified LTIP containing an LSLR plan as a separate and distinct component of the entity's LTIP.

10. Under 52 Pa Code § 65.55 the LSLR program is required to include the following elements:

- (1) A LSLR plan as described in 52 Pa. Code § 65.56.
- (2) A pro forma tariff or tariff supplement containing the proposed changes necessary to implement the entity's LSLR program as described in 52 Pa. Code § 65.58.
- (3) Information required by the Commission for filings under 66 Pa. C.S. § 1308, including statements required by 52 Pa. Code § 53.52(a).

A. LEAD SERVICE LINE REPLACEMENT PLAN

11. Pursuant to 52 Pa. Code § 65.56, an entity's LSLR Plan must contain, at a minimum:

- a. A service line inventory that complies with EPA regulation at 40 CFR 141.1-143.20 as enforced by DEP, inclusive of future changes as those regulations may be amended. The entity shall identify assumptions in its service line inventory.
- b. A planning and replacements section which includes the following:
 1. Projected annual investment in LSLRs per calendar year with an explanation of the entity's anticipated sources of financing;

2. Projected number of LSLRs per calendar year with an explanation of how the entity's projection was determined and a statement that this number is consistent with the entity's annual cap on LSLRs;
 3. Prioritization criteria considered when developing the LSLR schedule;
 4. An explanation of the processes and procedures to address emergency repairs or replacements which reveal LSLs;
 5. Processes and procedures to obtain acceptance of an LSLR prior to LSLR project commencement if the customer is the property owners, and the entity's processes and procedures to obtain acceptance prior to LSLR project commencement if the customer is not the property owner;
 6. The entity's processes and procedures based upon an acceptance of a LSLR;
 7. The entity's lead/material recycling and disposal efforts;
 8. The industry-accepted practices that the entity plans to use to replace entity-owned and customer owned LSLs;
 9. A detailed explanation of how the entity's acquisition of water distribution systems will be integrated into the entity's efforts to complete LSLRs throughout its water distribution systems; and
 10. The procedure for documenting refusal of, or failure to accept, the offer to replace a LSL.
- c. A communications, outreach and education section which complies with EPA regulations at 40 CFR 141.85, and includes (1) copies of all printed and broadcasted material to be distributed under the LSLR program as well as (2) the development of a LSLR section of its website within 12 months of Commission approval of its LSLR program.

12. PAWC's LSLR Plan is attached to this Petition as **Exhibit A**.

Service Line Inventory

13. PAWC has prepared its service line inventory, which is attached to the LSLR Plan as Appendix 1. PAWC's service line inventory complies with EPA's regulations at 40 CFR 141.1-143.20, as enforced by DEP.

14. The assumptions upon which PAWC relied in its service line inventory include (1) any construction that occurred after January 1991 will not contain lead due to The Plumbing System Lead Ban and Notification Act, 35 P.S. §§ 723.1 *et seq.*, ("PA Lead Ban") becoming effective on January 6, 1991; (2) that if the Company-side of a line is lead, it is more likely than not that the customer-side is or was also lead or galvanized; and (3) galvanized lines are downstream of lead lines.

15. If PAWC acquires a water distribution system in the future, it shall provide to the Commission a service line inventory for the acquired system upon completion of the acquisition or as part of its service line inventory, whichever is later.

Planning and Replacements

16. PAWC has prepared its planning and replacement section of its LSLR Plan, which is included in Section V of the LSLR Plan.

17. PAWC's projected annual investment in LSLRs is discussed in Section V of its LSLR Plan. As discussed in that section, LSLR projects will be funded initially by the Company's short-term debt, to be later replaced with a combination of long-term debt and equity capital. The Company also will seek grants and low interest loans through PENNVEST, if available, as a source of funding.

18. PAWC projects an average range of 2,800 to 4,300 LSLRs per calendar year. PAWC arrived at its projected number of LSLRs by reviewing the number of known service lines within each area and estimating 2% of unknown company-side service lines and 5% of unknown customer-side service lines will be lead or galvanized based on age of home and location. This number is consistent with PAWC's annual cap on LSLRs.

19. In developing its LSLR schedule, PAWC created and implemented a Geographic Information System ("GIS") based prioritization model to identify pipeline replacement and rehabilitation investment needs. The model prioritizes pipeline renewal needs through identification of service risks associated with pipe failure, fire-flow and water quality risks.

20. PAWC's processes and procedures to address emergency repairs or replacements that reveal LSLs are outlined in its LSLR Plan in Section V. In the event a Company-owned service line is leaking or damaged, the Company will replace both the Company-owned service line and customer-owned service line if a LSL is discovered. If the Company is informed of a leaking or damaged customer-owned LSL, it will work with the customer to develop a path forward, which is typically a one-off replacement.

21. PAWC's processes and procedures to obtain acceptance of an LSLR prior to LSLR project commencement are the same whether the customer is or is not the property owner. PAWC's processes and procedures to obtain acceptance of a LSLR prior to LSLR project are detailed in Section V of its LSLR Plan. The Company makes four attempts to contact customers or property owners in order to obtain consent to perform an LSLR. The Company's first two initial attempts at contact are in-person, the third attempt will be by email or telephone, and the fourth and final attempt is through a certified letter which informs the customer that termination of service may occur if the Company's offer is not responded to or refused.

22. PAWC's processes and procedures based upon acceptance of an LSLR are set forth in Section V of the LSLR Plan.

23. The consent agreement form by which PAWC obtains authorization for the LSLR is attached to Appendix 3 of the LSLR Plan. The consent agreement form is the same whether the property owner is or is not the customer.

24. PAWC's process based upon acceptance of an LSLR under normal conditions include having the customer or property owner execute a consent agreement along with a lead/galvanized information packet and flushing instructions, providing a water pitcher to the customer or property owner, and coordinating the LSLR with the customer or property owner.

25. Under atypical conditions, PAWC's process based upon acceptance of an LSLR is to replace the Company-side LSL and install dielectric coupling to immediately address the emergency situation. The Company will attempt to make immediate contact with the customer or property owner. The Company strives to replace the Company-side and customer-side LSL on the same day. The customer or property-owner is provided with a consent agreement, lead/galvanized information packet, flushing instructions, and a water pitcher.

26. PAWC's process for coordinating with the customer or the property owner is providing contact information to the customer or property owner for the Company's representative or a representative from the Company's contractor.

27. The information PAWC provides to the customer and property owner throughout the LSLR process is provided in Appendix 3 of the LSLR Plan.

28. PAWC's process for addressing LSLR completion or close out with the customer or the property owner is completing the installation of the LSLR, at which time the warranty for the LSLR becomes effective, and updating the service line inventory.

29. PAWC does not engage in lead/material recycling disposal efforts and therefore does not receive any proceeds from lead/material recycling disposal efforts.

30. The industry-accepted practices PAWC uses to replace Company-owned and customer-owned LSLs is detailed in Section V of the LSLR Plan, including the industry-accepted practices outlined in ANSI/AWWA C810/17.

31. Upon PAWC's acquisition of a water distribution system, the acquired water distribution system will be integrated into PAWC's efforts to complete LSLRs by the following process: The Company requests the acquired system to provide service line information, including the status of their service line inventory and their lead service line replacement plan, if available. If the acquired system submitted its service line inventory prior to acquisition close, PAWC will prioritize any lead or galvanized service replacements identified with main replacement projects or as a service line replacement project. If the acquired system did not complete its service line inventory, PAWC will evaluate service material during meter replacements, if applicable. The newly acquired customers will also have the option to participate in the online customer survey.

32. PAWC uses the following procedure for documenting refusal of, or failure to accept, PAWC's offer to replace a LSL : (1) PAWC provides to the customer and property owner, if the customer is not the property owner, a complete disclosure of the known health hazards from continued use of a LSL; (2) PAWC also informs the customer or property owner, if the customer is not the property owner, that refusal or failure to accept PAWC's offer to replace a LSL will require replacement of the customer-owned LSL at the customer or property-owner's own

expense, within one year from LSLR project commencement to be eligible for reimbursement;

(3) PAWC communicates to the customer or property owner (if the property owner is not the customer) that failure to allow PAWC to complete the LSLR or to replace the customer-owned LSL concurrent with PAWC replacing the Company-owned LSL will lead to termination of water service under PAWC's tariff.

Communication and Outreach

33. PAWC's Communications, Outreach, and Education section of its LSLR Plan is found in Section VI of the LSLR Plan.

34. PAWC's LSLR Plan complies with EPA regulations at 40 CFR 141.85.

35. Copies of all printed and broadcast material distributed under PAWC's LSLR program are included as Appendix 3 to the LSLR Plan.

36. PAWC has a LSLR section of its website which contains an online tool describing the replacement schedule by geographic location, at least six months into the future.

37. PAWC's website also contains information regarding reimbursement requirements and a secure online tool that provides customers or property owners the ability to determine whether they are eligible for reimbursement.

38. In addition, PAWC's website contains information that provides the ability to determine whether a property may have a LSL, delineating the known or reasonably anticipated material types for the Company-owned and customer-owned portions of the service line, as well as a method to request assistance to determine if a service line is a LSL.

39. Further, PAWC's website contains information and resources relating to health risks associated with lead and LSLs, the status of current efforts to replace LSLs, and community meetings and advisory committees hosted by PAWC.

B. RELATED TARIFF CHANGES

40. Attached as **Exhibit B** to this Petition is a Pro Forma Tariff Supplement to Tariff Water-PA P.U.C. No. 5 ("Pro Forma Tariff"), which sets forth the proposed tariff changes in compliance with 52 Pa. Code § 56.58.

41. PAWC's Pro Forma Tariff includes a cap of 3,200 on the number of customer-owned LSLs that can be replaced annually.

42. PAWC's effective Water Tariff includes a definition consistent with 52 Pa. Code § 65.52 for customer-owned LSL for the purposes of PAWC's LSLR program. "Customer-owned LSL" is defined under 52 Pa. Code § 65.52 as "The portion of the lead service line extending from the curb, property line or entity connection to an entity's water meter or, if the entity's meter is located outside of the structure or water is not metered by the entity, at the first shutoff valve located within the interior of the structure." Section 2.16a of the Company's Water Tariff defines Lead Service Pipe as "Any Service Pipe constructed with lead or galvanized pipe located downstream from a Service Pipe constructed with lead." In Section 2.16 of its Water Tariff, the Company defines Service Pipe as "That portion of a water line not owned by the Company which transmits water from the Company-owned water main to the Customer's premise. The water service pipe begins at the Company-owned street service connection and continues into the structure on the premise to be supplied." A copy of Sections 2.16 and 2.16a of PAWC's effective Water Tariff are attached hereto as Exhibit C.

43. PAWC specifies in Section 4.9.1.8 Pro Forma Tariff that if a shutoff valve is not located along a specific length of pipe within a structure, PAWC may install a shutoff valve to serve as a point of demarcation between the property's service line and the property's interior water distribution piping.

44. PAWC's Pro Forma Tariff contains in Section 4.9.1.7 the process by which PAWC perfects its ownership of the portion of the service line located within the then-existing right-of-way to ensure PAWC can obtain necessary permits during the planning phase of a LSLR project.

45. PAWC's Pro Forma Tariff specifies in Section 4.9.1.3 that neither a customer nor a property owner may install a partial LSLR, and that a partial LSLR will result in termination of service until such time as PAWC can replace the entity-owned LSL under 52 Pa. Code § 65.62.

46. PAWC's Pro Forma Tariff requires in Section 4.9.1.6 that if a customer or property owner elects to replace the customer-owned LSL, the customer or property owner shall replace the customer-owned LSL concurrent with PAWC replacing the Company-owned LSL, subject to the customer or property owner providing PAWC at least 90 days' notice prior to replacing the customer-owned LSL.

47. In Section 4.9.1.9 of PAWC's Pro Forma Tariff, PAWC establishes the process to address replacement of a customer-owned LSL to avoid termination when a property owner, who is not the customer, is non-responsive to PAWC's offer to replace a customer-owned LSL.

48. Section 4.9.1.3 of PAWC's Pro Forma Tariff makes clear that PAWC shall not connect an applicant for water service to a Company-owned service line at a property where a customer or property owner previously refused or failed to accept PAWC's offer of a LSLR until the applicant verifies the replacement of the customer-owned LSL by providing a paid invoice

from the licensed contractor where applicable or a verified statement from a licensed contractor attesting to completion of the LSLR.

49. Section 4.9.1.5 of PAWC's Pro Forma Tariff addresses reimbursements to eligible customers or property owners who replace their LSL within 1 year before or from LSLR project commencement. PAWC's Pro Forma Tariff includes language explaining its reimbursement terms and conditions, and contains (1) an explanation of PAWC's method for determining the amount of reimbursement, (2) an explanation of PAWC's reimbursement methods, and (3) an explanation of PAWC's method for determining eligibility providing that (a) a customer or property owner located within a LSLR project area is eligible for reimbursement of LSLR expenses up to 125% of the average cost the entity would have incurred to perform the replacement of a similarly-sized service line, not to exceed actual cost, and (b) a customer or property owner shall submit to PAWC a detailed estimate or verified statement and paid invoice from a licensed contractor were applicable, verifying the replacement of the customer-owned LSL.

50. In Section 4.9.1.5 of PAWC's Pro Forma Tariff, which outlines PAWC's method for determining reimbursement eligibility, PAWC explains that if the reimbursement causes PAWC to exceed its annual cap, PAWC will increase its current annual cap by the amount of the reimbursement and decrease its next annual cap by this amount.

51. PAWC shall make reasonable best efforts to assist the customer or property owner through the reimbursement process and, to the extent possible, make determinations in favor of the customer or property owner where the customer or property owner has provided reasonable evidence of a LSLR to PAWC.

52. In Section 4.9.1.2 of PAWC's Pro Forma Tariff, the Company provides a warranty on LSLR work performed by PAWC or its contractor of a term of not less than 2 years. PAWC's

warranty provisions (1) define the start of the two year period, (2) ensure the materials and workmanship of the replacement and restoration are covered, (3) define the maximum coverage amounts under the warranty, (4) explain any liability PAWC will have for damages not covered by the warranty, and (5) ensure PAWC access to the property to correct any deficiencies.

C. STATEMENTS REQUIRED BY 52 PA. CODE § 53.52(a)

53. Pursuant to 52 Pa. Code § 65.55(b)(3), PAWC has attached to this Petition as **Exhibit D** supporting data required by 52 Pa. Code § 53.52(a).

D. MODIFIED LTIP

54. Pursuant to 52 Pa. Code § 65.54(b), PAWC has attached to this Petition as **Exhibit E** a copy of a modified LTIP that incorporates PAWC’s LSLR Plan as a separate and distinct component of its LTIP.

E. ACCOUNTING AND RATEMAKING TREATMENT FOR CUSTOMER-OWNED LSLR COSTS

55. Pursuant to Act 120, PAWC will record the original cost of customer-owned LSLRs in a separate account that is segregated from other service line accounts as required by the LSLR Regulations. PAWC is entitled, pursuant to Act 120, to record a return on and of its investment to replace customer-owned LSLRs in future base rate cases and through its existing Distribution System Improvement Charge (“DSIC”).

F. PAWC’S LSLR PROGRAM IS IN THE PUBLIC INTEREST

56. Lead is a naturally occurring metal that can cause a variety of adverse health effects.

57. The EPA determined that, “Exposure to lead is known to present serious health risks to the brain and nervous system of children....Infants and children exposed to lead may

experience delays in physical and mental development and may show deficits in attention span and learning disabilities. In adults, lead exposure can cause kidney problems and high blood pressure. Copper exposure can cause stomach and intestinal distress, liver and kidney damage, and complications of Wilson's disease in genetically predisposed people.”¹

58. 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.

59. The Commission previously granted the Company permission to perform LSLR activities pursuant to an Order entered on October 3, 2019 at Docket No. P-2017-2606100.

60. The Company's LSLR Program seeks to continue the Company's efforts to replace company-owned and customer-owned LSLs and to comply with the Commission's LSLR Regulations.

61. PAWC's LSLR Program will allow the Company to address LSLs in its system in an efficient manner to address the recognized health risks posed by lead in drinking water. Accordingly, the Company's LSLR Program is reasonable and in the public interest.

III. SERVICE AND COMMISSION REVIEW

62. Pursuant to 52 Pa. Code § 65.54, PAWC is serving the Petition and the accompanying exhibit on the Commission's Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate and the parties of record to

¹ U.S. Environmental Protection Agency, Office of Water, "Lead and Copper Rule Revisions White Paper", https://www.epa.gov/sites/default/files/2016-10/documents/508_lcr_revisions_white_paper_final_10.26.16.pdf October 2016.

PAWC's last base rate case, which was filed at Docket Nos. R-2023-3043189 and R-2023-3043190.

IV. CONCLUSION

WHEREFORE, Pennsylvania-American Water Company respectfully requests the Pennsylvania Public Utility Commission grant its Petition and enter an Order approving the Company's Lead Service Line Replacement Program, finding that it complies with 66 Pa. C.S. §1311(b), 52 Pa. Code § 53.52(a), and 52 Pa. Code § 65.51 *et seq.* and the Commission's Final Rulemaking Order entered on March 14, 2022 at Docket No. L-2020-3019521.

Respectfully submitted,



Erin K. Fure, Esquire (PA ID 312245)
Pennsylvania-American Water Company
852 Wesley Drive, Mechanicsburg, PA 17055
Telephone: 717-550-1556 (o)
717-265-6369 (c)
Email: erin.fure@amwater.com

Dated: July 22, 2024

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PETITION OF PENNSYLVANIA-
AMERICAN WATER COMPANY FOR
APPROVAL OF A LEAD SERVICE LINE
REPLACEMENT PROGRAM, RELATED
TARIFF CHANGES, AND MODIFICATION
OF LONG-TERM INFRASTRUCTURE
IMPROVEMENT PLAN** :
:
:
: **DOCKET NO.: P-2024-** _____
:
:
:

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of a **Petition for Approval of Pennsylvania-American Water Company’s Lead Service Line Replacement Program, Related Tariff Changes, and Modification of Long-Term Infrastructure Improvement Plan**, upon the parties listed below, in the manner specified below, in accordance with the requirements of 52 Pa. Code § 1.54.

VIA ELECTRONIC MAIL

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

Allison Kaster, Director and Chief
Prosecutor
PA Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17120
akaster@pa.gov

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

Parties to Rate Case Docket Nos. R-2022-3031672 and R-2022-3031673

Melanie Joy El Atieh
Erin L. Gannon
David T. Evrard
Andrew J. Zerby
Jacob D. Guthrie
Office of Consumer Advocate
Forum Place – 5th Floor
555 Walnut Street
Harrisburg, PA 17101
OCAPAWC2023@paoca.org
Counsel for OCA

Carrie B. Wright
Bureau of Investigation and & Enforcement
Pennsylvania Public Utility Commission
Commerce Keystone Building
400 North Street, 2nd Floor
Harrisburg PA 17120
carwright@pa.gov
Counsel for I&E

Steven C. Gray
Rebecca Lyttle
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov
relyttle@pa.gov
Counsel for OSBA

Joseph L. Vullo
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
jlvullo@bvrrlaw.com
Counsel for Commission on Economic Opportunity

Adeolu A. Bakare
Charis Mincavage
Ryan Block
Kenneth Stark
McNees Wallace & Nurick LLC
100 Pine Street
Harrisburg, PA 17101
abakare@mcneeslaw.com
cmincavage@mcneeslaw.com
rblock@mcneeslaw.com
kstark@mcneeslaw.com
Counsel for Pennsylvania-American Water Large Users Group

Ria Pereira
John Sweet
Elizabeth Marx
Lauren Berman
The Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
rpereira@pautilitylawproject.org
jsweet@pautilitylawproject.org
emarx@pautilitylawproject.org
lberman@pautilitylawproject.org
pulp@pautilitylawproject.org
Counsel for CAUSE-PA

Kurt J. Boehm
Jody Kyler Cohn
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
kboehm@bkllawfirm.com
jkylercohn@bkllawfirm.com
Counsel for Cleveland-Cliffs Steel

Joan E. London
Kozloff Stoudt
2640 Westview Drive
Wyomissing, PA 19610
jlondon@kozloffstoudt.com
*Counsel for Borough of St. Lawrence,
Berks County*

Karen O. Moury
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
kmoury@eckertseamans.com
Counsel for Victory Brewing Company

Jessica Eskra
Katherine Kennedy
City of Scranton Law Department
340 North Washington Avenue
Scranton, PA 18503
jeskra@scrantonpa.gov
kkennedy@scrantonpa.gov
Counsel for City of Scranton

Sean M. Gallagher
Gallagher Law Group
110 East Diamond Street, Suite 101
Butler, PA 16001
smgallagher@gallagher.legal
Counsel for Cleveland-Cliffs Steel

J. Chadwick Schnee
Schnee Legal Services, LLC
74 East Main Street, #648
Lititz, PA 17543
chadwick@schneelegal.com
Counsel for Exeter Township

Lauren M. Burge
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
lburge@eckertseamans.com
Counsel for Victory Brewing Company

Kyle Donahue
621 Gibbons Street
Scranton, PA 18505
kyle.23.donahue@gmail.com

Robert Ralls
254 Red Haven Road
New Cumberland, PA 17070
rralls73@yahoo.com



Erin K. Fure (Pa. No. 312245)
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
erin.fure@amwater.com
717-550-1556

Dated: July 22, 2024

Counsel for
Pennsylvania-American Water Company