



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

IN REPLY PLEASE
REFER TO OUR FILE

August 2, 2024

Docket No. R-2024-3050208
Utility Code 212070

COURTNEY L SCHULTZ ESQUIRE
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RE: Newtown Artesian Water Company Supplement No. 158 To Water-PA P.U.C. No. 9 at
Docket No. R-2024-3050208

Dear Attorney Schultz:

On July 19, 2024, Newtown Artesian Water Company (NAWC) filed the above-captioned document with the Pennsylvania Public Utility Commission (Commission). For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

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

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

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

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

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

Signature _____
Title _____
Date _____

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

In addition, to expedite completion of the review, please send a copy of the response to Paul Zander, in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at pzander@pa.gov. Please also direct any questions to Paul Zander at telephone number (717) 783-1372. Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure: TUS Data Request Set 1

cc: Patrick Cicero, Office of Consumer Advocate (w/enclosure), ra-oca@paoca.org
Christine Hoover, Office of Consumer Advocate (w/enclosure), choover@paoca.org
NazAarah Sabree, Office of Small Business Advocate (w/enclosure), ra-sba@pa.gov
Allison Kaster, Bureau of Investigation & Enforcement (w/enclosure), akaster@pa.gov

TUS Data Request Set 1

Newtown Artesian Water Company (NAWC) Supplement No. 158 To Water-PA P.U.C. No. 9 at
Docket No. R-2024-3050208

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

- R-1. NAWC's Supplement No. 158 To Water-PA P.U.C. No. 9 (Supplement No. 158) and supporting data filed with the Commission (collectively, the Tariff Supplement Filing) did not include a signed verification statement that confirmed NAWC gave notice to the public of Supplement No. 158 as required by 52 Pa. Code § 53.45(b). Please confirm that NAWC gave notice to the public of Supplement No. 158 as required by 52 Pa. Code § 53.45(b).
- R-2. NAWC's Tariff Supplement Filing did not include a signed verification statement indicating that the information provided in the Tariff Supplement Filing is true and correct. Please provide a verification statement that references the Tariff Supplement Filing filed with the Commission and that complies with 52 Pa. Code § 1.36(b).
- R-3. NAWC's response for 52 Pa. Code § 53.52(a)(2) did not include data for the 12-month periods ending March 31, 2025 (the FTY) and ending March 31, 2026 (the FPFTY). Provide a breakdown of the total number of customers served by NAWC, by customer class, at the end of the FTY and the FPFTY, respectively.
- R-4. NAWC's responses for 52 Pa. Code § 53.52(a)(3) and (b)(3) did not include data for the FTY and the FPFTY. Please provide a breakdown of the number of customers, by customer class, whose bills will be affected or increased, at the end of the FTY and the FPFTY, respectively. Also, for the public and private fire protection customer classes, please specify billing determinants (e.g., fire service lines, sprinkler heads, private hydrants, public hydrants, etc.) and quantities.
- R-5. NAWC's response for 52 Pa. Code § 53.52(c)(2) did not include data for the FTY and the FPFTY. Please provide detailed balance sheets for NAWC at the end of the FTY and the FPFTY, respectively.
- R-6. NAWC's filing did not address 52 Pa. Code § 53.52(c)(6). Please provide a response for 52 Pa. Code § 53.52(c)(6).
- R-7. The Tariff Supplement Filing's Exhibit GRH-1, Page 28, Adjustment Reference E-3 adjusts chemical expense by \$9,709 to reflect the projected annual usage of chemicals and current unit prices, a 21% increase over NAWC's \$46,033 HTY expense ($\$9,709 / \$46,033 = 21\%$). Please explain in detail the reasons for this proposed adjustment.
- R-8. The Tariff Supplement Filing's Exhibit GRH-1, Page 33, Adjustment Reference E-16 adjusts 2024 internet services costs by \$18,000, a 15% increase over NAWC's \$120,761 HTY expense ($\$18,000 / \$120,761 = 15\%$). Please explain in detail the reasons for this proposed adjustment.

TUS Data Request Set 1

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Docket No. R-2024-3050208

- R-9. The Tariff Supplement Filing's Exhibit GRH-1, Appendix C, Page 41 identified present and proposed rates for public and private fire protection customers (collectively, Fire Protection Customers). Additionally, Supplement No. 158, Page 2 specified that Supplement No. 158 increases flat rates and wholesale rates on Page 6. However, Supplement No. 158 did not include a revised Page 6. Also, Exhibit GRH-1, Appendix C – Pro Forma Revenues Under Proposed Rates does not appear to reflect any wholesale revenues at present or proposed rates. Considering these discrepancies, please provide responses for each of the following:
- a. Specify NAWC's proposed rates for Fire Protection Customers and customers that receive wholesale service.
 - b. If NAWC is proposing rates for Fire Protection Customers and customers that receive wholesale service that differ from NAWC's present rates, clarify how NAWC intends to file this rate change with the Commission.
 - c. Specify billing determinants (e.g., demand charge, electric pumping, and purchased water quantities), quantities, and revenues for customers that receive wholesale service at present rates for the HTY, the FTY, and the FPFTY.
 - d. Specify billing determinants, quantities, and revenues for customers that receive wholesale service at proposed rates for the FPFTY.
 - e. Confirm whether the Tariff Supplement Filing's Exhibit GRH-1, Page 12 includes revenues for customers that receive wholesale service.
- R-10. The Tariff Supplement Filing's NAWC Statement No. 3, Page 1 referenced an Exhibit HW-1, which is comprised of 19 Schedules. However, the Tariff Supplement Filing does not include copies of Exhibit HW-1 nor the referenced schedules. Please provide a copy of Exhibit HW-1 and the referenced schedules.
- R-11. Supplement No. 158, Page 31 does not appear to use the proposed baseline values of 446,135 and 671,941 for Baseline 1,000 Gallons of Purchased Water and Water Sales, respectively, in NAWC's Purchased Water Adjustment Charge (PWAC) formula. Please explain this discrepancy and state whether NAWC will revise the PWAC formula in Supplement No. 158, Page 31 to conform with any adjustments to these baseline values that result from this proceeding.
- R-12. Please provide copies of supporting data that demonstrate how NAWC calculated PWAC customer and consumption charges and purchased water quantities.

TUS Data Request Set 1

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Docket No. R-2024-3050208

- R-13. The Tariff Supplement Filing's Exhibit Nos. JJS-2 and JJS-3 identified Account No. 320.31 Water Treatment Plant Equipment – PFAS. Considering this account, please responses for each of the following:
- a. Provide a detailed description of the assets to be placed into service, by year, for the FTY and FPFTY.
 - b. Provide a detailed explanation as to how a 15-year service life was assigned to this account, including identifying any reliance on manufacturer recommendations or industry publications.
 - c. Clarify if the 15-year service life identified for Account No. 320.31 is a composite service life for all components included in the account and provide justification as to how assigning a composite service life to the assets included in this account is appropriate.
- R-14. Please provide a copy of a *pro forma* PWAC computation, in a form like NAWC's PWAC computation filed on March 14, 2024, at Docket No. M-2024-3047437, that reflects how NAWC will calculate its PWAC using proposed PWAC Baseline values. This PWAC computation must also address each of the following items:
- a. Confirm that NAWC revised Line Nos. 1, 2, 3, 15, and 16 to use three decimal places, consistent with the baseline values specified in NAWC's tariff that use three decimal places.
 - b. Confirm that NAWC revised Line No. 8 to calculate baseline purchased water expense as Line No. 5 times Line No. 2 plus Line No. 6 times Line No. 3.
 - c. Confirm that Line No. 9 is a *pro forma* rate rather than baseline data.
- R-15. Please provide a recent copy of a water bill from each class of customer served by NAWC (i.e., residential, commercial, industrial, etc.).
- R-16. Please provide a copy of NAWC's most recent federal income tax return.