



Teresa K. Harrold
Director, Corporate Counsel
852 Wesley Drive | Mechanicsburg, PA 17055
Phone: 717-550-1562 | Fax: 717-550-1255
teresa.harrold@amwater.com

September 26, 2024

VIA ELECTRONIC FILING AND PUC SHAREPOINT SITE

Ms. Rosemary Chiavetta, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

In re: Application of Pennsylvania-American Water Company for
Approval of the Right to Offer, Render, Furnish or Supply
Wastewater Service to the Public in an Additional Portion of
Fairview Township, York County, Pennsylvania
Docket No. A-2024-3050785

Dear Secretary Chiavetta:

In response to your letter dated September 12, 2024, attached for filing is Pennsylvania-American Water Company's responses to Data Request Set I, regarding the above referenced proceeding. Please note, due to the size of the attachments, they will be filed on the PUC's SharePoint site.

Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Teresa K. Harrold".

Teresa K. Harrold

cc: All Parties on the Attached Certificate of Service (*via electronic mail*)
Clinton McKinley, Bureau of Technical Utility Service (*via electronic mail*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**In re: Application of Pennsylvania-American Water :
Company for Approval of the Right to Offer, Render, : Docket No. A-2024-3050785
Furnish or Supply Wastewater Service to the Public in :
an Additional Portion of Fairview Township, York :
County, Pennsylvania :**

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the above-referenced Responses on the persons and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

SERVICE VIA ELECTRONIC MAIL ON SEPTEMBER 26, 2024

Patrick Cicero, Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923

NazAarah Sabree, Small Business Advocate
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101

Alison Kaster, Director
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
PO Box 3265
Harrisburg, PA 17105

Sincerely,



Teresa K. Harrold, Esquire (PA ID #311082)
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
Phone: (717) 550-1562
email: teresa.harrold@amwater.com

**Attorney for Pennsylvania-American
Water Company**

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

A-1. In Section III., Paragraph 6., of the Application, PAWC-WD included a table that identified the wastewater facilities (Proposed Facilities) it intends to install within the requested service territory and the associated cost estimate. Additionally, PAWC-WD identified that the requested service territory is required to provide public wastewater service to a new residential development (Sienna Development) being developed by Sienna Fee Simple LLC (Developer) that will consist of two phases with the first (Phase 1) and second (Phase 2) phases being comprised of 356 and 299 residential units, respectively, for a total of 655 residential units. Considering the Proposed Facilities, please provide responses for the following:

- a. Clarify if the Proposed Facilities and associated cost estimate include the materials and projected expenses required to extend wastewater service to both phases of the Sienna Development;
- b. Clarify whether PAWC-WD intends to install approximately 2,170 linear feet (LF) of six-foot or six-inch diameter force main;
- c. Explain the discrepancy between the Proposed Facilities including only 133 six-inch diameter service laterals with the projected number of 655 residential units in the Sienna Development;
- d. Provide a breakdown of the proposed construction schedule for the full build-out of the Sienna Development by phase, the number of residential units by type, and year; and
- e. Provide a projected timeline individually for the construction of the main extension and Phase 1 of the Proposed Facilities, and Phase 2 of the Proposed Facilities.

Response:

- a. The current cost estimate provided by Kinsley Construction is only for the first phase of the project. A second phase cost can be developed knowing that the costs could change in the future as the second phase is closer to construction.
- b. A six-inch diameter force main.

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

- c. The (3) 72-unit apartment buildings will each only have one service lateral. The (4) 24-unit apartment buildings have one service lateral per building. All of the remaining connections are individual connections for a total of 343 connections within the development.
- d. See **TUS A-1.d Attachment** consisting of two tables, one for the rental townhomes and apartments as well as a separate one for the villas and single family homes. The community center will also be completed during this time period.
- e. See **TUS A-1.e Attachment** or the most up-to-date schedule for phase 1. Phase 2 is difficult to predict at this time, but the schedule would need to be completed prior to the development of units in phase 2.

Response Provided by: Max Stoner, PE, Sr. Project Leader

**Kyle Gillespie, Sr. Land Development Manager
Burkentine Land Development**

(Subparts a, c-e)

**Stephen DeFriece, Engineering Project Manager
Pennsylvania-American Water Company
(Subpart b)**

Date: September 26, 2024

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

- A-2.** In Section III., Paragraph 8., of the Application, PAWC-WD indicated the cost estimate for the main extension and wastewater facilities (PAWC-WD Estimate) to be installed by PAWC-WD within the requested service territory would total \$2,542,984. However, the copy of a letter from Kinsley Construction dated July 24, 2024 (Kinsley Estimate), provided as the Application's Exhibit I indicated that the cost estimate of \$2,542,984 is only for Phase 1 of the proposed Sienna Development. Please provide responses to the following:
- a. Clarify the apparent discrepancy between the PAWC-WD and Kinsley Estimates regarding whether the \$2,542,984 represents the total expenditure required for Phase 1 only or for the entire Sienna Development; and
 - b. Provide a revised PAWC Estimate that includes a breakdown of the estimated pipe sizes, material types, and lengths separately for the main extension to interconnect PAWC-WD existing system with the Sienna Development system, and for each phase of the Sienna Development along with the descriptions and quantities for related appurtenances.

Response:

- a. See **TUS A-2.a1_Attachment and TUS A-2.a2_Attachment** consisting of the current estimates from Kinsley Construction for the first and second phase of the project.
- b. This is included in the above-referenced estimates from Kinsley Construction.

Response Provided by: Max Stoner, PE, Sr. Project Leader

Kyle Gillespie, Sr. Land Development Manager
Burkentine Land Development

Date: September 26, 2024

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

- A-3.** In Section III., Paragraph 8., of the Application, PAWC-WD indicated that meters will be installed as part of the Proposed Facilities and the Developer will be responsible for the associated expense. However, the cost estimates provided in the table of the Application's Paragraph 6 and Exhibit I do not appear to include the associated expense for the meters. Please provide responses to the following:
- a. Clarify whether the meters identified are contemplated to be installed by PAWC as part of its extension of water service to the Sienna Development or if the meters will be installed and used as part of PAWC-WD's provision of wastewater service; and
 - b. If the meters are part of the Proposed Facilities, provide the number and size of meters and meter pits along with the associated cost estimate proposed to be installed as part of the wastewater system within the requested service territory.

Response: No, PAWC's water meters will not be used for billing purposes. Wastewater service will be billed by EDU.

Response Provided by: **Stephen DeFriece, Engineering Project Manager
Pennsylvania-American Water Company**

Date: **September 26, 2024**

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

A-4. Pages 3 and 14 of the December 17, 2015, Commission Order (2015 Order), provided as the Application’s Exhibit F, referenced mapping provided as part of Fairview Township’s (Fairview’s) Act 537 Sewage Facilities Plan Update approved by the Pennsylvania Department of Environmental Protection (DEP) on July 27, 2011 (2011 Plan Update). The 2011 Plan Update mapping does not appear to depict the requested service territory as an area within Fairview Township that was planned for sewerage. Please provide evidence that this Application is consistent with Fairview Township’s DEP approved Act 537 Official Sewage Facilities Plan, including any approved updates and revisions (i.e., sewage facilities planning modules).

Response: Please see **TUS-A-4_Attachment** for the Sewer Facilities Planning Module for this project.

Response Provided by: **Stephen DeFriece, Engineering Project Manager
Pennsylvania-American Water Company**

Date: **September 26, 2024**

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

A-5. A footnote on Page 3 of the Application and the Application’s Exhibit C indicated that the Fairview Township Board of Supervisors conditionally approved Phase 1 of the Sienna Development. Please provide responses to the following:

- a. Provide a complete and legible copy, in electronic format, of the most recent Fairview Township approved preliminary and/or final subdivision plan set for Phase 1 of the Sienna Development.
- b. Please provide evidence that Phase 2 of the Sienna Development has received preliminary and/or final subdivision plan approval from Fairview Township. If so, provide a complete and legible copy, in electronic format, of the most recent Fairview Township approved preliminary and/or final subdivision plan set along with a copy of all municipal approval letter(s) including all approval conditions.

Response:

- a. See **TUS A-5.a.1_Attachment** (Preliminary Subdivision Plan) and **TUS A-5.a.2_Attachment** (Final Phase I Subdivision Plan).
- b. See **TUS A-5.a.1_Attachment**.

Response Provided by: Max Stoner, PE, Sr. Project Leader

**Kyle Gillespie, Sr. Land Development Manager
Burkentine Land Development**

Date: September 26, 2024

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

A-6. The requested service territory depicted on the Application’s Exhibit B-1 and described by bearing angles and distances on the Application’s Exhibit B-2 appears to exclude the southeastern corner of Parcel ID 2 (York County Parcel ID Number 27-000-RE0029.B0-C0002). Please explain why PAWC-WD is not requesting to provide wastewater service to this area.

Response: Please see PAWC’s revised Exhibit B-1 attached hereto as **TUS-A-6_Attachment**.

Response Provided by: **Stephen DeFriece, Engineering Project Manager
Pennsylvania-American Water Company**

Date: **September 26, 2024**

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

- A-7.** In the Application’s Section III., Paragraph 6., PAWC-WD indicated that all portions of the requested service territory are owned and being developed by the Developer as depicted on a copy of a map (Service Territory Map) entitled “Proposed Service Territory Extension – Sienna Development” dated July 23, 2024, included as the Application’s Exhibit B-1. However, the Service Territory Map included parcels that do not appear to be owned by the Developer. Through publicly available information accessed on the York County Tax Parcel Viewer, the Commission identified Parcel No. 27-000-RE-0029.B0-C00A1 (Sienna Parcel) comprised of 24.77 acres of land as the parcel owned by the Developer.¹ Further, the Application’s Exhibit D included a copy of map (2022 Plot Map) entitled “Plot Map for Sienna” dated August 4, 2021, revised March 8, 2022. The 2022 Plot Map appears to have added Parcel Nos. 27-000-RE-0029.E0-00000 and 27-000-RE-0029.00-00000 (North Parcels) comprised of 12.11 and 13.53 acres of land with a notation that the North Parcels were owned by Fairview York Investments LLC (FYILLC. The Commission notes that the North Parcels have subsequently been sold by FYILLC to private individuals. All other parcels (Limekiln Rd Parcels) of land depicted on the Service Territory Map bounded by bearing angle and distance points 1 through 17, or the area south of Limekiln Road, as described in the Application’s Exhibit B-2 appear to be owned by private residents or entities. Collectively, the North and Limekiln Rd. Parcels comprise potential customers outside of the Sienna Development (Outside Development Customers). Please provide responses to the following:
- a. Provide written evidence of any requests for wastewater service from the potential Outside Development Customers.
 - b. Quantify the number of proposed customers, by customer class, included as Outside Development Customers;
 - c. Identify the entity or individuals that will be responsible to fund construction of the facilities required to connect and serve the Outside Development Customers;
 - d. Identify how the Outside Development Customers currently receive water service;

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

- e. Identify how the Outside Development Customers currently receive wastewater service; and
- f. Provide a map that depicts a contiguous land area encapsulating the Sienna Parcel west of Spanglers Mill Road identified by York County Parcel No. 27-000-RE-0029.B0-C00A1 that abuts to PAWC-WD's existing certificated territory. Additionally, provide a description of the Sienna Parcel by bearing angles and distances along with the land area quantified in acres.

Response:

- a. None except for an existing single-family home requesting a grinder pump connection.
- b. None that have requested service. There are 2 potential commercial properties and the remainder are residential, including the one existing outside development residence.
- c. Any customer requests for service that occur prior to PAWC obtaining certificated wastewater rights in this area will need to be funded by the customer. Once PAWC is granted the certificated wastewater rights in this area, PAWC will contribute to a portion of any bona fide customer's costs consistent with its wastewater tariff.
- d. Our assumption is that these customers are private well users.
- e. Our assumption is that these customers are private septic tank users.
- f. See **TUS-A-6_Attachment**.

**Application of Pennsylvania-American Water Company – Wastewater Division for Approval to
Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional
Portion of Fairview Township, York County, Pennsylvania**

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

Response Provided by: Max Stoner, PE, Sr. Project Leader

**Kyle Gillespie, Sr. Land Development Manager
Burkentine Land Development
(Subparts a and b)**

**Stephen DeFriece, Engineering Project Manager
Pennsylvania-American Water Company
(Subparts c-f)**

Date: September 26, 2024

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

A-8. The 2022 Plot Map depicted the construction of a community center in Phase 1 of the Sienna Development that appears to be a commercial customer. Please provide responses to the following:

- a. Provide a breakdown of the number of proposed customers by customer class and phase in the Sienna Development; and
- b. Provide a revised Exhibit M that identifies the estimated annual revenue and expenses, reflective of the proposed customer classes in the Sienna Development.

Response:

- a. 655 residential units, 1 commercial clubhouse. The clubhouse is the only commercial class within the development.
- b. Please see **TUS A-8.b_Attachment**.

Response Provided by: Max Stoner, PE, Sr. Project Leader

**Kyle Gillespie, Sr. Land Development Manager
Burkentine Land Development
(Subpart a)**

**Ashley E. Everette, Senior Director – Rates and Regulatory
(Subpart b)**

Date: September 26, 2024

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

A-9. The Application’s Exhibit H included a copy of PAWC-WD’s draft Sewer Main Extension Agreement (Extension Agreement). Section 6 of the Extension Agreement indicated that the Developer would pay capacity reservation fees and connection fees. Additionally, the Commission notes that the Extension Agreement appears to be silent or does not include any provision for a customer refund amount for each additional customer connecting to the Proposed Facilities. Considering the Extension Agreement, please provide responses to the following:

- a. Quantify any estimated capacity reservation fees and connection fees to be paid by the Developer; and
- b. Indicate whether PAWC-WD will be refunding the Developer a set amount per residential customer for a set period of time from the date of Extension Agreement’s execution up to a maximum potential refund. If so, provide the refund amount per customer, the set period of time for refunds, and the maximum potential refund.

Response:

- a. The estimated capacity reservation fees and connection fees are \$2,652,750
- b. Not applicable.

Response Provided by: Stephen DeFriece, Engineering Project Manager
Pennsylvania-American Water Company

Date: September 26, 2024

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

- A-10.** In Section III., Paragraph 10., of the Application, PAWC-WD indicated that it's Lower Allen Wastewater Treatment Plant (WWTP) has sufficient collection, conveyance, and treatment system capacity to serve the proposed 694 EDUs when both phases of the Sienna Development are complete. The Commission notes that PAWC-WD filed an Assignment and Assumption Agreement (Assignment Agreement) between PAWC-WD and Lower Allen Township, Lower Allen Township Authority (LATA), and Fairview Township dated October 12, 2015.2 Specifically, Section 7.(e) of the Assignment Agreement appears to limit the connection points to the LATA sewer system unless otherwise agreed in writing by LATA and PAWC-WD. Please provide responses to the following:
- a. Clarify if PAWC-WD owns the Lower Allen WWTP; and
 - b. If PAWC-WD does not own the Lower Allen WWTP, provide evidence that all necessary agreements or contracts are in place for PAWC-WD to convey the estimated flow from the requested service territory to the Lower Allen WWTP for treatment.

Response:

- a. PAWC-WD does not own Lower Allen WWTP.
- b. All necessary agreements are in place. Please see **TUS-10.b Attachment**, which includes the Assignment and Assumption Agreement between Pennsylvania-American Water Company and Lower Allen Township dated October 12, 2015 and the amendment that will be executed reflecting this development's service.

Response Provided by: **Stephen DeFriece, Engineering Project Manager
Pennsylvania-American Water Company**

Date: **September 26, 2024**

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

A-11. Please provide an estimate of the annual number of customers, by customer class, that would be connected to the Proposed Facilities within the next 5 years, and an estimate of the associated average daily wastewater flow, by year, to be generated within the requested service territory.

Response:

All units are to be complete and connected within the next 5 years. See **TUS A-1.e Attachment**, which documents the projected pace of construction.

Response Provided by: Max Stoner, PE, Sr. Project Leader

Kyle Gillespie, Sr. Land Development Manager
Burkentine Land Development

Date: September 26, 2024

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

A-12. Provide a copy of the most recent Chapter 94 Wasteload Management Report filed with the DEP for the Lower Allen Township WWTP.

Response: Please see **TUS-A-12_Attachment**.

Response Provided by: **Stephen DeFriece, Engineering Project Manager
Pennsylvania-American Water Company**

Date: **September 26, 2024**

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

A-13. In Section III., Paragraph 10., of the Application, PAWC-WD provided hydraulic details for the Lower Allen Township WWTP. Please provide response to the following:

- a. Quantify the anticipated organic load projected to be generated within the requested service territory at the completion of Phase 1 and separately at the completion of Phase 2.
- b. Provide evidence that the Lower Allen Township WWTP has adequate organic load capacity to accept the projected wastewater flow from the requested service territory at the completion of Phase 1 and separately at the completion of Phase 2.

Response:

- a. Phase 1 of Sienna has 356 EDUs for 136.17 lbs of organic loading per day. Phase 2 of Sienna has 299 EDUs for 114.41 lbs of organic loading per day.
- b. See **TUS-A-12 Attachment**, which includes Lower Allen Township's 2023 Chapter 94 report.

Response Provided by: **Max Stoner, PE, Sr. Project Leader**

**Kyle Gillespie, Sr. Land Development Manager
Burkentine Land Development**

Date: **September 26, 2024**

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

A-14. In Section III., Paragraph 11, of the Application, PAWC-WD indicated that the requested service territory is already within Pennsylvania-American Water Company's (PAWC's) certificated water service territory. Please provide evidence that the requested service territory is within PAWC's certificated water service territory.

Response: Pennsylvania-American Water Company is certificated to serve water in all of Fairview Township, York County via several mergers and acquisitions. Please see **TUS A-14_Attachment.**

Response Provided by: Jana Hurst, Senior Paralegal
Pennsylvania-American Water Company

Date: September 26, 2024

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

A-15. The 2022 Plot Map depicted a force main connection with PAWC-WD’s existing collection system within Pin Oak Drive. Considering this connection, please provide responses to the following:

- a. Identify PAWC-WD’s existing facilities, including the material type, size, and capacity, to be used to convey flow from the requested service territory to the Lower Allen WWTP;
- b. Provide evidence that PAWC-WD’s existing facilities have adequate capacity to provide wastewater service to the requested service territory; and
- c. Identify any required upgrades to PAWC-WD’s existing facilities to be used to provide wastewater service to the requested service territory and the estimated cost of these upgrades.

Response:

- a. The current cost estimate provided by Kinsley Construction is only for the first phase of the project. A second phase cost can be developed knowing that the costs could change in the future as the second phase is closer to construction.
- b. The developer will complete a Special Study consistent with PAWC’s water quality management permit to evaluate whether PAWC has adequate capacity to convey the wastewater flow from the requested territory. The Study includes both PAWC and Lower Allen mains. Any upgrades that are required have to be completed and certified by DEP prior to service connection.
- c. The (3) 72-unit apartment buildings will each only have one service lateral. The (4) 24-unit apartment buildings have one service lateral per building. All of the remaining connections are individual connections for a total of 343 connections within the development.

**Application of Pennsylvania-American Water Company – Wastewater Division for Approval to
Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional
Portion of Fairview Township, York County, Pennsylvania**

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

Response Provided by: Max Stoner, PE, Sr. Project Leader

**Kyle Gillespie, Sr. Land Development Manager
Burkentine Land Development**

Date: September 26, 2024

Application of Pennsylvania-American Water Company – Wastewater Division for Approval to Begin to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Fairview Township, York County, Pennsylvania

Docket No. A-2024-3050785

PAWC Responses to TUS Set I

- A-16.** The 2022 Plot Map also depicted a proposed private low pressure sanitary force main to serve the property owned by Bruno G. Bertin. Considering this proposed privately owned force main, please provide responses to the following:
- a. Provide evidence of a request for service from the property owner to be served from this proposed force main;
 - b. Identify the entity or individual that will finance the construction of this force main;
 - c. Quantify the estimated number of Equivalent Dwelling Units (EDUs) to be served by this private force main and clarify whether the 694 EDUs and estimated average flow demand of 117,750 gallons per day includes flow from the property to be served by the private force main and the Outside Development Customers; and
 - d. Provide copies of any additional agreements between PAWC-WD and the property owner to receive wastewater service from the privately owned force main.

Response:

- a. See **TUS A-16.a Attachment**. Note that the property is now owned by a Robin Wiley, not Bruno G. Bertin.
- b. Property owner/developer
- c. Yes, already included in total EDUs
- d. None.

Response Provided by: **Max Stoner, PE, Sr. Project Leader**

**Kyle Gillespie, Sr. Land Development Manager
Burkentine Land Development**

Date: **September 26, 2024**


**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Pennsylvania-American Water :
Company for Approval of the Right to Offer, Render, : Docket No. A-2024-3050785
Furnish or Supply Wastewater Service to the Public in :
an Additional Portion of Fairview Township, York :
County, Pennsylvania :

VERIFICATION

I, Kyle Gillespie, Sr. Land Development Manager, Burkentine Land Development, hereby state that the facts set above in the responses to TUS Data Request, Set I, Nos. A-1(a, c-e), A-2, A-5, A-7, A-8(a), A-11, A-13, and A-16 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).

Dated: 9-25-24



Kyle Gillespie
Sr. Land Development Manager
Burkentine Land Development

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Pennsylvania-American Water :
Company for Approval of the Right to Offer, Render, : Docket No. A-2024-3050785
Furnish or Supply Wastewater Service to the Public in :
an Additional Portion of Fairview Township, York :
County, Pennsylvania :

VERIFICATION

I, Max Stoner, PE, Sr. Project Leader, JHA Consulting Engineers, hereby state that the facts set above in the responses to TUS Data Request, Set I, Nos. A-1(a, c-e), A-2, A-5, A-7, A-8(a), A-11, A-13, and A-16 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).

Dated: 9-25-24



Max Stoner, PE
Sr. Project Leader
JHA Consulting Engineers

VERIFICATION

I, Jana Hurst, hereby state that the facts above set forth above in the attached Data Responses 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 made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.



Jana Hurst, Senior Paralegal
Pennsylvania American Water Company

Dated: 9/26/2024

VERIFICATION

I, Ashley E. Everette, hereby state that the facts above set forth above in the attached Responses 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 made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.

September 26, 2024
Date



Ashley E. Everette, Sr. Director of Rates and Regulatory
American Water Works Service Company

VERIFICATION

I, STEPHEN A. DEFRIECE, hereby state that the facts above set forth in the attached Application above 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 made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.



Stephen A. DeFriece, Project Manager
Pennsylvania-American Water Company

Dated: 9/26/2024