



September 27, 2024

VIA E-FILING

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

Re: Proposed Water Audit Methodology Regulation 52 Pa. Code § 65.20a – Water Conservation Measures; Docket No. L-2020-3021932

Corrections/Updates to Comments of the National Association of Water Companies – Pennsylvania Chapter

Dear Secretary Chiavetta:

On August 28, 2023, the National Association of Water Companies – Pennsylvania Chapter (“NAWC”) filed comments at the docket number referenced above. It has come to my attention that certain information in that filing needs to be corrected or updated.

Footnote 1 on page 1 states:

¹ The members of NAWC are: Aqua Pennsylvania, Inc.; Columbia Water Company; Newtown Artesian Water Company; Pennsylvania-American Water Company; The York Water Company; and Veolia Water Pennsylvania, Inc. (f/k/a SUEZ Water Pennsylvania Inc.). Newtown Artesian Water Company is a Class B water utility; the remaining members of NAWC are Class A water utilities. In addition to water operations, several members operate Commission-regulated wastewater systems.

Please be advised that Newtown Artesian Water Company is a Class A water utility.

In addition, please be advised that, after NAWC filed its comments, Community Utilities of Pennsylvania Inc. joined NAWC. Community Utilities of Pennsylvania Inc. is a Class A utility.

Finally, Question 10 asked “Are you a ‘small business’ as defined in Section 3 of the Regulatory Review Act, Act 76 of 2012, 71 P.S. § 745.3?” NAWC answered by stating that no NAWC members meet the referenced definition of a small business.

Please be advised that Columbia Water Company and Newtown Artesian Water Company meet the referenced definition of a small business. Aqua Pennsylvania, Inc.; Community Utilities of Pennsylvania Inc.; Pennsylvania-American Water Company; The York Water Company; and

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Veolia Water Pennsylvania Inc. are not small businesses as defined in the Regulatory Review Act.

Copies of this correspondence are being served as shown on the attached Certificate of Service.

Thank you for your attention to this matter. Please contact me if you have any questions or concerns about this correspondence.

Sincerely,

COZEN O'CONNOR



By: David P. Zambito, Esq.
Counsel for *National Association of Water Companies – Pennsylvania Chapter*

DPZ

cc: Louise Fink Smith, Esq. (Law Bureau)
Karen A. Thorne (Law Bureau)
Per Certificate of Service
Mark Lucca, President, National Association of Water Companies

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Proposed Water Audit Methodology Regulation 52 Pa. : Docket No. L-2020-3021932
Code § 65.20a – Water Conservation Measures :

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing **Corrections/Updates to Comments of the National Association of Water Companies – Pennsylvania Chapter**, upon the parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below:

Service by E-mail and First Class Mail:

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Respectfully,



David P. Zambito, Esq.
Counsel for *National Association of Water
Companies – Pennsylvania Chapter*

Date: September 27, 2024