



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

November 5, 2024

IN REPLY PLEASE
REFER TO OUR FILE

Docket No. R-2024-3051816
Utility Code 210060

WHITNEY E SNYDER ESQUIRE
HMS LEGAL LLP F/K/A HAWKE MCKEON AND SNISCAK LLP
501 CORPORATE CIRCLE SUITE 302
HARRISBURG PA 17110
WESNYDER@HMSLEGAL.COM

RE: Audubon Water Company Supplement No. 7 to Tariff Water – Pa. PUC No. 4 at Docket
No. R-2024-3051816

Dear Attorney Snyder:

On October 25, 2024, Audubon Water Company (Audubon) 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

Audubon Water Company Supplement No. 7 to Tariff Water – Pa. PUC No. 4 at Docket No. R-2024-3051816

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. Audubon’s Supplement No. 7 to Tariff Water – Pa. PUC No. 4 (Supplement No. 7) and supporting data filed with the Commission (collectively, the Tariff Supplement Filing) did not include a signed verification statement that confirmed Audubon gave notice to the public of Supplement No. 7 as required by 52 Pa. Code § 53.45(b). Please confirm that Audubon gave notice to the public of Supplement No. 7 as required by 52 Pa. Code § 53.45(b).
- R-2. Audubon’s Tariff Supplement Filing did not include a signed verification statement from an authorized officer or employee 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. Audubon’s Replacement Tariff Supplement No. 7 to Tariff Water – Pa. PUC No. 4 (Replacement Supplement No. 7), Page No. 3 indicated that increases were made to Second Revised Page No. 6A and Second Revised Page No. 7. However, Replacement Supplement No. 7 does not include copies of these pages. Please provide an updated Supplement No. 7 that includes copies of Second Revised Page No. 6A and Second Revised Page No. 7, and that makes any necessary corrections to Page No. 3.
- R-4. Please indicate if Audubon is current with the Commission’s Security Self-Certification filing requirements.
- R-5. Please demonstrate that Audubon filed its Annual Asset Optimization Plan (AAOP) with the Commission for the first 12 months of its long-term infrastructure improvement plan (LTIIP) pursuant to 52 Pa. Code § 121.6(a) (i.e., the 2023 calendar year).
- R-6. Please state whether Audubon determined that a major modification to its LTIIP was necessary once Audubon finalized its AAOP. If so, please provide evidence that Audubon filed with the Commission a petition for modification pursuant to 52 Pa. Code §§ 121.5(a) and 121.6(c).
- R-7. The Tariff Supplement Filing’s Schedules E-1 and F-1 both identified Contributions in Aid of Construction (Net of Accumulated Depreciation) (Net CIAC) in the amount of \$2,653,411 as of June 30, 2024. However, the Tariff Supplement Filing’s Schedule J-1-2 identified the remaining basis of Net CIAC in the amount of \$2,196,067 as of June 30, 2024. Please provide an explanation for this apparent discrepancy.
- R-8. The Tariff Supplement Filing’s Schedules E-1 and E-2 both identified Customer Advances for Construction (CAC) in the amount of \$652,429. However, the Tariff Supplement Filing’s Schedule F-1 did not reflect the identified CAC amount of \$652,429

TUS Data Request Set 1

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as a rate base reduction. Please provide a copy of a revised Schedule F-1 to reflect Audubon's projected CAC balance of approximately \$652,429 as a rate base reduction.

- R-9. The Tariff Supplement Filing's Schedule E-3 identified a \$790,000 investment in Acct. Code 322 – Mains & Accessories labelled as Moving Crawford Rd. Proj. – Lower Providence Twp. However, the Tariff Supplement Filing's Schedule J-2-1 did not identify any retirements related to this project. Also, the Tariff Supplement Filing's Schedules E-3 and E-4 did not identify any CIAC or CAC for plant additions, although in Page A-15, Audubon indicated that it would be paid up to \$100,000 for its costs associated with an anticipated project. Please provide copies of revised Schedules E-3, E-4, J-1-1, J-1-2, J-2-1, and J-2-2 that reflect original cost, annual depreciation, and accumulated depreciation adjustments for replacements of existing utility plant identified in Schedule E-3, including any impacts to CIAC or CAC.
- R-10. The Tariff Supplement Filing's Schedule I-8 included a *pro forma* purchased water expense adjustment that included \$5,867 in present expenses and a net adjustment of \$3,324 for State Tax Adjustment Surcharge (STAS) and Distribution System Improvement Charge (DSIC). However, it appears that Audubon's \$161,587 *pro forma* adjustment includes all water usage included in present rates (i.e., expenses above \$161,587 would require incremental usage that is not identified), and it does not appear that changes in purchased water expenses would result in changes in STAS and DSIC expenses at present rates. Please explain in detail the reasons for these proposed adjustments.
- R-11. Please provide copies of supporting data that demonstrate how Audubon calculated purchased water adjustment charge (PWAC) purchased water costs and baseline values.
- R-12. Please provide a copy of a *pro forma* PWAC computation that reflects how Audubon would calculate its PWAC. These computations must reflect whether PWAC revenues would be subject to Audubon's STAS and DSIC.
- R-13. Please provide a recent copy of a water bill from for each class of customer (e.g., residential, commercial, industrial, etc.) served by Audubon.
- R-14. Please provide a copy of Audubon's most recent federal and state income tax returns.