

Secretary
Pennsylvania Utility Commission
400 North Street
Harrisburg, PA 17120

November 18, 2024

**BEFORE THE
PENNSYLVANIA UTILITY COMMISSION**

LOUIS MATZEL AND JODI ASAY
COMPLAINANT

v.

Docket No. C-2023-3045163

PENNSYLVANIA -AMERICAN
WATER COMPANY

Complainants Request

Discovery Details:

As requested, readings were taken on November 8, 2024 and were documented with both PAWC supervisors and Complainants licensed plumber in attendance.

The readings are agreed upon as follows:

- 1) Meter pit reading at curb stop- 125 psi
- 2) Interior home pressure gauge at service line outlet- 132 psi
- 3) Water Filtration gauge (pressure adjusted by residents PRV)- 75 psi
(43% reduction)

REQUEST:

For “good engineering practices” to prevail, Complainants require the assistance of PAWC so that both parties **can come together** in order to comply with their responsibilities as both consumer and residential water distribution supplier under all IRC code, PAWC Rules/ Regulations/ Tariffs, Pennsylvania Title 52, Title 25 and “66 Pa.C.S. § 1501”, DEP Public Water Supply Manual Part II Community System Design Standards and Safe Water Drinking Act. Only then, all Pennsylvania statutes, codes and regulations can be satisfied.

Limitations of a standard residential Pressure Reducing Valve recommends no more than a 20% reduction to avoid failure. (see footnote) The Complainants PRV is reducing more than double the recommended amount at a 43% reduction. Any fittings or appliances prior to and including the PRV are subject to malfunction, leaks and failure as regulated by IAPMO. Additionally, Chapter 6 Water Supply and Distribution 608.2 (a) & (b) requires a modification by the Utility when pressure exceeds 80 psi and specifies the limitations of the residential PRV.

Footnote: see IAMPO Chapter 6 Water Supply and Distribution 608.2 (b) Limitations on Pressure Regulating or Reducing Valves (Matzell/Asay exhibit 9)

The Complainants or any PAWC consumer with a buried meter pit at the curb stop, are unable to comply with the requirements under PAWC's 4.7 Regulation (PAWC exhibit 9) as it is currently written. Financially, it would cost \$2500-3500 to install a simple pressure reducing device. Logistically, in order to merely inspect and maintain the PRV would require excavation. Legally, the inlet side of the meter is the company side now that the meters were moved to the meter pit at the curb stop. No consumer is allowed to modify the (inlet) company side of the meter.

We request the following:

1) New regulations need to be made to reflect the Consumer/Utility Responsibility of PAWC Regulation 4.7. As of now, it is written to reflect a meter being located within the residence and does not make mention of how to proceed with a buried, locked meter pit at the curb stop. There should be a paragraph articulating the regulation of meters located within the home and another paragraph for meters located in a locked meter pit for the safety and protection of both parties.

2) Due to the poor engineering, and lack of foresight of PAWC, it would seem logical for the utility to regulate the pressure coming into the service line if the pressure exceeds 80 psi or a "worse case scenario" of 100 psi at the curb stop due to limitations of a residential PRV recommending no more than 20% reduction. (see footnote.) Therefore, we ask for a modification by the utility when water pressure exceeds 100 psi, requiring either:

a) a Pressure Reducing Zone to cover a section of the street when a determined number of consecutive homes are effected in in Orange, Purple and Red zones of PAWC's exhibit #1 set for DEP's recommended 60 psi, or the IRC regulated set pressure of 80 psi, not to exceed 100 psi. or;

b) an individual Pressure Reducing Device installed by PAWC at the curb stop *only* when requested and deemed necessary set for the DEP's recommended 60 psi, or the IRC regulated set pressure of 80 psi, not to exceed 100 psi.

3) Complainants ask PAWC to bare the brunt of the cost due to financial and logistical limitations of the consumer. PAWC has technicians with Class E licenses on duty 24/7/365 and the cost to them is nominal. For the consumer it is a financial hardship, logistical problem and a legal quagmire to require the consumer or a common residential plumber to control the pressure in a locked, buried meter vault due to the absence of PAWC's foresight in this matter.


We ask the commission to consider the following:

66 Pa. C.S. § 1501, "Every public utility shall furnish and maintain adequate, efficient, safe, and reasonable service and facilities, and shall make all such repairs, changes, alterations, substitutions, extensions, and improvements in or to such service and facilities as shall be necessary or proper for the accommodation, convenience, and safety of its patrons, employees, and the public. Such service also shall be reasonably continuous and without unreasonable interruptions or delay. Such service and facilities shall be in conformity with the regulations and orders of the commission..."

Title 52 § 65.6. (a) "A utility may undertake... furnishing adequate service to any customer or where called for by good engineering practices. The authority of the Commission to require service improvements incorporating standards other than those set forth in this subsection when, after investigation, it determines that such improvements are necessary is not hereby restricted."

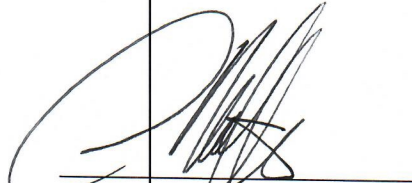
Footnote: see IAMPO Chapter 6 Water Supply and Distribution 608.2 (b) Limitations on Pressure Regulating or Reducing Valves (Matzell/Asay exhibit 9)

Respectfully submitted,



Jodi Asay

231 Manchester Dr Bushkill PA 18324



Louis Matzel