



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

IN REPLY PLEASE  
REFER TO OUR FILE

December 4, 2024

Docket No. P-2023-3042107  
Utility Code 210013

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RE: Petition of Veolia Water Pennsylvania, Inc. for Approval of its Lead Service Line Replacement Program and Modification of its Long-Term Infrastructure Improvement Plan at Docket No. P-2023-3042107

Dear Attorneys Zambito and Nase:

On July 24, 2023, Veolia Water Pennsylvania, Inc. (Veolia Water) filed the above-captioned document (Petition) 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 Matthew T. Lamb, P.E. in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at [mlamb@pa.gov](mailto:mlamb@pa.gov). Please also direct any questions to Matthew Lamb at telephone number (717) 783-1001. Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta  
Secretary

Enclosure: TUS Data Request Set 3

cc: Patrick Cicero, Office of Consumer Advocate (w/enclosure), [ra-oca@paoca.org](mailto:ra-oca@paoca.org)  
Melanie El Atieh, Office of Consumer Advocate (w/enclosure), [melatieh@paoca.org](mailto:melatieh@paoca.org)  
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### TUS Data Request Set 3

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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.

- P-35. Data Request P-24 asked that Veolia Water provide a revised Amended LSLR Plan, modified LTIP, and *pro forma* tariff supplement that included an annual cap and any applicable maximum budgeted amount necessary for Veolia Water to replace all existing Company-owned and Customer-owned LSLs inclusive of all GRR within a certain period and a statement that Veolia Water's projected number of LSLRs per calendar year is consistent with Veolia Water's annual cap on LSLRs. Veolia Water's response to Data Request P-24 included a *pro forma* tariff supplement with proposed annual cap and budgeted amount for Company-owned LSLs, but did not include the requested statement. Please provide responses for each of the following:
- a. Provide a revised Amended LSLR Plan, modified LTIP, and *pro forma* tariff supplement that either removes the annual cap and budgeted amount for Company-owned LSLs, or that modifies the statement "Any portion of the annual budgetary allotment that is not spent on COLSL replacements in a given year will roll over to the next subsequent year [...]" to clearly indicate whether these funds will be restricted to funding COLSL replacements, or whether these funds may be used to fund COLSL replacements or Company-owned LSL replacements; and
  - b. Provide a revised Amended LSLR Plan response for 52 Pa. Code § 65.56(b)(2) that includes a statement that Veolia Water's projected number of LSLRs per calendar year is consistent with Veolia Water's annual cap on LSLRs.
- P-36. Veolia Water's response to Data Request P-24 included a *pro forma* tariff supplement with a statement that indicated, "Any portion of the annual budgetary allotment that is not spent on COLSL replacements in a given year will roll over to the next subsequent year, subject to annual cap of 20 COLSL replacements per year." However, the *pro forma* tariff supplement also identified an annual cap of up to 90 COLSL replacements per year. Please provide a revised *pro forma* tariff supplement that eliminates the statement "subject to annual cap of 20 COLSL replacements per year".
- P-37. Data Request P-29 noted that 52 Pa. Code § 65.58(b)(1) requires that an entity's *pro forma* tariff or tariff supplement must include a definition for customer-owned LSL for purposes of the entity's LSLR Program that is consistent with 52 Pa. Code § 65.52 and asked that Veolia Water provide a revised *pro forma* tariff supplement that included a definition for customer-owned LSL for purposes of the entity's LSLR Program that is consistent with 52 Pa. Code § 65.52. Veolia Water's revised *pro forma* tariff included the following definition for "Customer Owned Lead Service Line: Any Customer Service Line constructed with lead or galvanized pipe located downstream from a Service Pipe constructed with lead." This definition is not consistent with 52 Pa. Code § 65.52. Please provide a revised *pro forma* tariff supplement that replaces Veolia Water's definition for "Customer Owned Lead Service Line" with a definition that is consistent

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with 52 Pa. Code § 65.52. For example, Veolia Water’s November 2023 Pro Forma Tariff, Page 68 included defined terms for “Customer Owned Lead Service Line” and “Lead Service Line” that appear to conform with 52 Pa. Code § 65.52.

- P-38. Data Request P-30 asked that Veolia Water provide a revised *pro forma* tariff supplement that is consistent with 52 Pa. Code § 65.58(d)(1)(ii) and that specifies the length of time, in days, by which Veolia Water will issue a reimbursement for an eligible request. For example, the November 2023 Pro Forma Tariff, Page 67 indicated “within 60 days of verification of the customer’s claim”, which Data Request P-30 indicated may be modified so that the length of time to verify reimbursement request eligibility is included in the total length of time to issue a reimbursement. Veolia Water’s revised *pro forma* tariff supplement did not include the length of time, in days, by which Veolia Water will issue a reimbursement for an eligible request, where the length of time to verify reimbursement request eligibility is included in the total length of time to issue a reimbursement. Instead, “with 60 days of the verification of the customer’s claim” was added to a sentence that describes how reimbursement amounts are calculated, and that does not describe the length of time for Veolia Water to determine eligibility. Please provide a revised *pro forma* tariff supplement that includes the length of time, in days, by which Veolia Water will issue a reimbursement for an eligible request, where the length of time to verify reimbursement request eligibility is included in the total length of time to issue a reimbursement. For example, Veolia Water may indicate a length of time to verify reimbursement request eligibility (e.g., 60 days) and another length of time to issue a reimbursement for an eligible request (e.g., 30 days), or one length of time that includes verification of reimbursement request eligibility and issuing reimbursements for eligible requests (e.g., 90 days).
- P-39. Data Request P-32 asked that Veolia Water provide a revised *pro forma* tariff supplement that is consistent with 52 Pa. Code § 65.58(d)(1)(iii)(A). For example, Veolia Water’s November 2023 Pro Forma Tariff, Page 67 included terms for reimbursement amounts that appeared to conform with 52 Pa. Code § 65.58(d)(1)(iii)(A), except reimbursement terms described in Data Request P-31. However, Veolia Water’s revised *pro forma* tariff supplement did not include language that is consistent with 52 Pa. Code § 65.58(d)(1)(iii)(A). Please provide a revised *pro forma* tariff supplement that is consistent with 52 Pa. Code § 65.58(d)(1)(iii)(A). For example, Veolia Water may replace the following revised *pro forma* tariff supplement language with the below-identified language from Veolia Water’s November 2023 Pro Forma Tariff:
- a. Replace “the commencement of the main replacement project” with “LSLR project commencement”; and
  - b. Replace “The date of commencement of a main replacement project is the date the Company begins physical main replacement work in the project area that includes the Customer’s premise” with “A LSLR project is a Company-scheduled LSLR activity, either in conjunction with main replacements or as part of an LSLR program. An

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LSLR project area is the area encompassing the Company's scheduled LSLR activities, which includes the area within a 1-mile radius of an LSLR project, if served by the Company. The date of commencement of a LSLR project is the date of installation of the first LSLR within a LSLR project area.”