



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

IN REPLY PLEASE
REFER TO OUR FILE

December 19, 2024

Docket No. P-2024-3050472
Utility Code 210011

DANIEL IYA
ELVERSON WATER COMPANY INC
PO BOX 20
ELVERSON PA 19520
INBOX@ELVERSONWATER.COM

RE: Petition of Elverson Water Company, Inc. for Approval of Its Lead Service Line Replacement Program at Docket No. P-2024-3050472

Dear Daniel Iya:

On November 19, 2024, Elverson Water Company, Inc. (Elverson 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 at the address listed below **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:

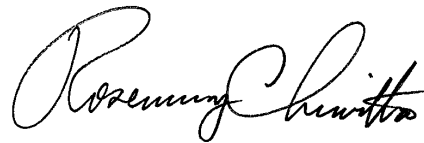
I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made 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. 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 1

cc: Patrick Cicero, Office of Consumer Advocate (w/enclosure), ra-oca@paoca.org
Melanie El Atieh, Office of Consumer Advocate (w/enclosure), melatieh@paoca.org
NazAarah Sabree, Office of Small Business Advocate (w/enclosure), ra-sba@pa.gov
Rebecca Lyttle, Office of Small Business Advocate (w/enclosure), relyttle@pa.gov
Allison Kaster, Bureau of Investigation & Enforcement (w/enclosure), akaster@pa.gov

TUS Data Request Set 1

Petition of Elverson Water Company, Inc. for Approval of Its Lead Service Line Replacement Program at Docket No. P-2024-3050472

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-1. Elverson Water Company, Inc.'s (Elverson Water's) Petition for a Lead Service Line Replacement Program (LSLR Program) included a copy of its Service Line Inventory (SLI) as the LSLR Program's Appendix G. The SLI appears to identify only company-owned service lines. Also, in the SLI Column "Ownership Type", all service lines are identified as System-owned (i.e., the entire service line is company-owned). However, Elverson Water's effective water tariff, Pages 7 and 8, include definitions for "company service line" and "customer service line" that appear to indicate that Elverson Water may not own the entire length of all service lines. Please provide responses for each of the following:
- a. State whether Elverson Water owns the entire length of all its water service lines;
 - b. If Elverson Water does not own the entire length of all its water service lines, provide a revised SLI that identifies separate data for both the company-owned and customer-owned portions of the water service lines; and
 - c. Provide a revised LSLR Program, Lead Service Line Replacement Plan (LSLR Plan), and responses to 52 Pa. Code § 53.52 that contain any necessary amendments to address both the company-owned and customer-owned portions of the water service lines.
- P-2. The LSLR Program's Appendix C included a copy of its Lead Service Line Replacement Plan (LSLR Plan). The LSLR Plan does not appear to explain Elverson Water's processes and procedures to address emergency repairs or replacements which reveal lead service lines (LSLs). Pursuant to 52 Pa. Code § 65.62, the Commission notes that any repair of a known or discovered LSL would be considered a partial LSLR and is strictly prohibited regardless. Correspondingly, the Commission also notes that a water main replacement or repair, regardless of whether the main replacement activities were planned or an emergency, that reveals a LSL would require a complete LSLR prior to the service line being placed back into service as the reconnection of a LSL to a new main segment or a new company-owned service line would be considered a partial LSLR. Please provide responses to the following:
- a. Clarify whether Elverson Water intends to maintain the proper equipment and tools necessary for its staff, or contract with a third-party, to complete emergency LSLRs; and
 - b. Provide a revised LSLR Plan that explains Elverson Water's processes and procedures to address emergency repairs or replacements which reveal LSLs.
- P-3. The LSLR Program's Appendix F indicated that an electronic working copy of Elverson Water's SLI was filed with the Commission's Secretary's Bureau electronically via the e-

TUS Data Request Set 1

Petition of Elverson Water Company, Inc. for Approval of Its Lead Service Line Replacement Program at Docket No. P-2024-3050472

file system. However, the Excel spreadsheet filed on November 19, 2024, is not a live electronic copy. The Commission notes that Excel spreadsheets may need to be submitted to the Secretary's Share Point File system and entities will need to contact the Secretary's Bureau in advance to gain access to the Share Point File system. Please confirm that Elverson Water has verified with the Commission's Secretary's Bureau that a live electronic copy of Elverson Water's SLI was filed and uploaded to the correct docket number.

- P-4. The LSLR Plan's Section (b)(6) referred to the LSLR Program's Appendix H for an explanation of its processes and procedures to obtain acceptance of a LSLR prior to LSLR project commencement if the customer is the property owner, and the entity's processes and procedures to obtain acceptance prior to LSLR project commencement if the customer is not the property owner. However, Appendix H consists only of a copy of the proposed LSLR acceptance letter and does not explain how and when Elverson Water intends to provide this letter to customers or property owners, if the property owner is not the customer. Please provide a revised LSLR Plan that includes an explanation of Elverson Water's processes and procedures to obtain acceptance of a LSLR prior to LSLR project commencement if the customer is the property owner, and the entity's processes and procedures to obtain acceptance prior to LSLR project commencement if the customer is not the property owner.