



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

IN REPLY PLEASE
REFER TO OUR FILE

December 31, 2024

Docket No. A-2024-3052459
Utility Code 230073

ERIN K FURE ESQUIRE
PENNSYLVANIA AMERICAN WATER COMPANY
852 WESLEY DRIVE
MECHANICSBURG PA 17055
ERIN.FURE@AMWATER.COM

RE: Application of Pennsylvania-American Water Company – Wastewater Division for approval to begin to offer, render, furnish or supply wastewater service to the public in an additional portion of West Caln Township, Chester County, Pennsylvania at Docket No. A-2024-3052459

Dear Attorney Fure:

On December 6, 2024, Pennsylvania-American Water Company – Wastewater Division (PAWC-WD) filed the above-referenced document (Application) 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 efiling with the Secretary of the Commission by opening an efiling account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efiling 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:

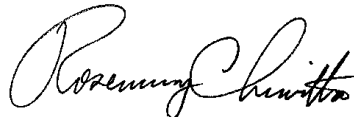
I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made 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 application, please send a copy of your response to Clinton McKinley in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at cmckinley@pa.gov. 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
Allison Kaster, Bureau of Investigation & Enforcement (w/enclosure), akaster@pa.gov

TUS Data Request Set 1

Application of Pennsylvania-American Water Company – Wastewater Division for approval to begin to offer, render, furnish or supply wastewater service to the public in an additional portion of West Caln Township, Chester County, Pennsylvania at Docket No. A-2024-3052459

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.

- A-1. Please provide a calculation of the company contribution that would be required under PAWC-WD's effective tariff if PAWC-WD were not proposing to assume the entire cost of the installation of the proposed facilities.
- A-2. In the Application's Paragraph 13, PAWC-WD indicated that it is reasonable for PAWC-WD to cover the cost of this installation under Rule 7 of its Wastewater Tariff, which permits PAWC-WD to deviate from its standard main extension requirements when it is prudent, reasonable, and in the public interest. Please confirm that PAWC-WD is referring to Page 34, Section H, Rule 7 of its effective wastewater tariff and provide a *pro forma* copy of PAWC-WD's offsite development marketing agreement for the property owner.
- A-3. Please clarify if PAWC-WD is proposing a main extension or only the installation of a service lateral and provide a breakdown of the estimated cost, by major plant account, of the facilities and estimated cost identified in Paragraph 12 of the Application.
- A-4. Please confirm that the proposed facilities will be constructed within the right-of-way along North Sandy Hill Road.
- A-5. Please confirm that the proposed connection within the requested service territory is permitted under the connection management plan included as Appendix B to the Coatesville Wastewater Treatment Plant Annual Wasteload Management Report provided as part of the Application's Exhibit F.
- A-6. In Paragraph 18 of the Application, PAWC-WD indicated it expects wastewater service to begin shortly after Commission approval of this Application. Please provide an estimated timeline for PAWC-WD to complete construction and to begin to provide wastewater service in the requested service territory upon approval of this Application.
- A-7. In the Application's Paragraph 9, PAWC-WD indicated that the septic system at the Woodland Drive property failed inspection and that the land does not lend itself to have a replacement on-site system installed. Please provide a copy of the referenced inspection report and any evidence that indicates the land does not lend itself to having a replacement on-site system installed.
- A-8. In Paragraph 21 of the Application, PAWC-WD indicated that it will charge its existing Rate Zone 1 rates for service. Please clarify if PAWC-WD intends to charge Rate Zone 1 metered rates within the requested service territory.

TUS Data Request Set 1

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- A-9. In the Application’s Exhibit J, PAWC-WD provided estimated annual revenue and expense information that specified a metered monthly residential service charge of \$14.30 and a usage charge per 100 gallons of \$2.8750. However, the Application’s Exhibit I consisted of a copy of PAWC-WD’s effective wastewater tariff that specified a metered residential service charge of \$15.00 per month and a usage charge of \$2.9539 per 100 gallons. Please provide an updated Exhibit J that reflects PAWC-WD’s effective wastewater tariff rates.
- A-10. In the Application’s Section 23, Footnote 4, PAWC-WD indicated that it had repeatedly sent letters to Chester County for approval of this plan and the Application’s Exhibit L included copies of letters dated April 18, 2023, and October 11, 2023, that were not completed by Chester County. Since Chester County appears to be non-responsive to PAWC-WD’s review requests, please provide an averment from PAWC-WD that the Application is consistent with county comprehensive planning, including the boundaries of the requested service territory.
- A-11. The Application’s certificate of service did not indicate that copies of the Application were served on West Caln Township, the West Caln Township Planning Commission, Chester County, the Chester County Planning Commission, and the Pennsylvania Department of Environmental Protection’s central and regional offices. Please provide a verification that a complete copy of the Application was served on each of these entities.
- A-12. Please confirm that PAWC-WD can provide adequate wastewater collection, conveyance, treatment, and disposal capacity to meet present and future customer needs.