



Erin K. Fure
Director, Corporate Counsel
852 Wesley Drive | Mechanicsburg, PA 17055
Phone: 717-550-1556 | Fax: 717-550-1255
erin.fure@amwater.com

January 16, 2025

VIA ELECTRONIC FILING

Ms. Rosemary Chiavetta, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

**In re: Application of Pennsylvania-American Water Company for
Approval of the Right to Offer, Render, Furnish or Supply
Wastewater Service to the Public in an Additional Portion of
West Caln Township, Chester County, Pennsylvania**

Docket No. A-2024-3052459

Dear Secretary Chiavetta:

In response to your letter dated December 31, 2024, attached for filing is Pennsylvania-American Water Company's responses to Data Request Set II, regarding the above referenced proceeding.

Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Erin K. Fure".

Erin K. Fure

Enclosures

cc: All Parties on the attached Certificate of Service (*as designated on the Certificate of Service*)
Clinton McKinley, Bureau of Technical Utility Services (*via electronic mail*)
James P. Kelly (*via electronic mail*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Re: In the Matter of Application of Pennsylvania-American Water Company for Approval of the Right to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of West Caln Township, Chester County, Pennsylvania	: : : : : : :	Docket Number A-2024-3052459
--	---------------------------------	---

CERTIFICATE OF SERVICE

I hereby certify that I am this day serving the above-referenced Responses upon the persons and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

Service in the manner listed below addressed as follows on January 16, 2025

Patrick Cicero, Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
(via electronic mail)

NazAarah Sabree, Small Business Advocate
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
(via electronic mail)

Alison Kaster, Director
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
PO Box 3265
Harrisburg, PA 17105
(via electronic mail)

Respectfully Submitted,



Erin K. Fure, Esquire (PA ID #312245)
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
Phone: (717) 550-1574
Email: erin.fure@amwater.com

**Attorney for Pennsylvania-American
Water Company**

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

Docket No. A-2024-3052459

SET II

A-14. Confidential Exhibit B-1 depicted the route of PAWC-WD’s existing facilities in the vicinity of the requested service territory but did not depict all of the proposed facilities within the requested service territory. Please provide an additional map that depicts all of the proposed facilities within the requested service territory including facilities (e.g., valves, grinder pump, customer portion of the lateral, etc.) to be constructed by the property owner.

Response: The proposed facility is a lateral that would run from the force main to the customer's property. We don't know exactly where that will be until the property owner runs their lateral. It is known that the lateral will connect to the property from North Sandy Hill Road which is where the sewer force main is located.

Responsible Witness: **James P. Kelly, Manager of Operations – Coatesville Pennsylvania-American Water Company**

Date: **January 16, 2025**

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

Docket No. A-2024-3052459

SET II

A-15. The Application’s Exhibit B-1 consisted of a confidential map of the requested service territory that depicted four coordinate points defining the boundaries of the requested service territory with four-line segments. However, the Application’s Exhibit B-2 included a metes and bounds description of the requested service territory that identified five coordinate points. Please clarify if the point labelled Point 5 is actually Point 1.

Response: Please see **A-15_Attachment**.

Responsible Witness: **Mallory M. Weakland, Principal GIS Specialist
Pennsylvania-American Water Company**

Date: **January 16, 2025**

Starting Point: The northwestern most point of parcel UPI 28-5-95.17,
located at 101 Woodland Drive, Caln Township, PA.

Sequence	From	To	Bearing	Distance (ft)
1	1	2	S84°14'41"E	235.98
2	2	3	S8°19'50"W	180.27
3	3	4	N82°01'11"W	236.12
4	4	1	N8°27'27"E	171.11

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

Docket No. A-2024-3052459

SET II

A-16. In the Application, PAWC-WD indicated that Exhibit B-2 consisted of a metes and bounds description of the area to be served and that the Application’s Exhibit C consisted of a legal description of the “Applied for Service Territory.” However, the boundaries defined in Exhibit B-2 and the boundaries defined in the legal description do not align. Please clarify whether the Application’s Exhibit C contains a legal description of Chester County Tax Parcel UPI 28-5-95.17 and that the Application’s Exhibit B-2 defines the boundaries of the requested service territory.

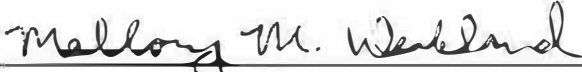
Response: See, **A-15_Attachment.**

Responsible Witness: **Mallory M. Weakland, Principal GIS Specialist
Pennsylvania-American Water Company**

Date: **January 16, 2025**

VERIFICATION

I, Mallory M. Weakland hereby state that the facts above set forth above 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 made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.

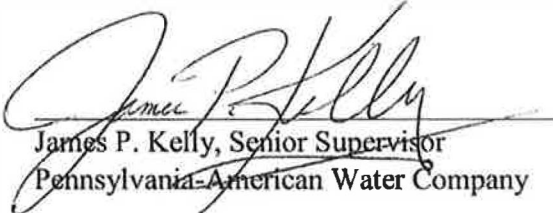


Mallory M. Weakland, Principal GIS Specialist
Pennsylvania-American Water Company

Dated: 1/16/2025

VERIFICATION

I, James P. Kelly hereby state that the facts above set forth above 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 made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 (relating to unsworn falsification to authorities).


James P. Kelly, Senior Supervisor
Pennsylvania-American Water Company

Dated: January 16, 2025