



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

IN REPLY, PLEASE  
REFER TO OUR FILE

January 23, 2025

Docket No.: P-2024-3052037  
Utility Code: 230240

MICHAEL W. HASSELL  
POST & SCHELL ATTORNEYS AT LAW  
17 NORTH SECOND STREET  
12TH FLOOR  
HARRISBURG, PA 17101-1601  
[mhassell@postschell.com](mailto:mhassell@postschell.com)

**RE: Petition of Aqua Pennsylvania Wastewater, Inc. (APW) for Approval of its  
Third Long-Term Infrastructure Improvement Plan**

Dear Mr. Hassell,

On November 8, 2024, Aqua Pennsylvania Wastewater Inc. filed a Petition seeking approval of its Third Long-Term Improvement Plan (LTIIP). To assist the Commission in conducting the review of APW's LTIIP, please respond with the information requested in Attachment 1. The 120-day LTIIP consideration period outlined in the Commission's Final Implementation Order would have ended on March 8, 2025.<sup>1</sup> However, in order to review the additional information requested, the Commission is hereby extending its consideration period for APW's Third LTIIP to March 31, 2025.

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 efilng with the Secretary of the Commission by opening an efilng account through the Commission's website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilng system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit it 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:

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<sup>1</sup> See, Docket No. M-2012-2293611.

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

**Please note that your answers must be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

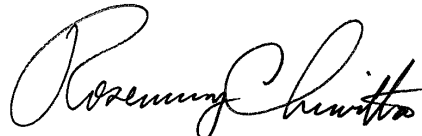
*I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made 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 your response to Ken Shaffer in the Bureau of Technical Utility Services, Reliability and Emergency Preparedness Division, via e-mail at [kennshaffe@pa.gov](mailto:kennshaffe@pa.gov). Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta  
Secretary

cc: Sharon Webb, LAW  
Dan Searfoorce, TUS  
John Van Zant, TUS  
Ken Shaffer, TUS  
NazAarah Sabree, OSBA, [ra-sba@pa.gov](mailto:ra-sba@pa.gov)  
Christy M. Appleby, OCA, [CApplby@paoca.org](mailto:CApplby@paoca.org)  
Katherine Kennedy, OCA, [kkennedy@paoca.org](mailto:kkennedy@paoca.org)

Attachment 1  
TUS Data Request 1  
Petition of Aqua Pennsylvania Wastewater, Inc. for Approval of its Third Long-Term  
Infrastructure Improvement Plan  
Docket No P-2024-3052037

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.

Reference the Petition of Aqua Pennsylvania Wastewater Inc (APW), filed on November 8, 2024, Exhibit A.

**1. Reference Exhibit A**

- a. The Commission finds that APW’s acquisition of the East Whiteland Township wastewater system has been reversed in a July 31, 2023, Order by the Commonwealth Court of Pennsylvania.<sup>2</sup> Therefore the assets of the East Whiteland Township wastewater system are not jurisdictional and do not meet the definition of eligible property under 52 Pa. Code § 121.2. APW is directed to file an amended LTIP that excludes the assets and expenditures related to the repair and replacement of any infrastructure of the East Whiteland Township wastewater system. Failure to do so may result in the Commission ordering APW to file a new or revised LTIP, pursuant to 52 Pa. Code § 121.4.

**2. Reference Exhibit A, Section 8: Outreach and Coordination Activities with Other Utilities, PennDOT, Homeowners Associations, and Local Governments**

- a. Describe in detail any scheduled meetings between APW and any local and state agencies for the years 2025 through 2029 related to replacement and or repair of eligible property in APW’s wastewater collection systems.
- b. Describe any scheduled meetings between APW and local stakeholders and non-governmental organizations for the years 2025 through 2029 related to replacement and or repair of eligible property in APW’s wastewater collection systems.

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<sup>2</sup> See, *Patrick M. Cicero v. Pennsylvania Public Utility Commission*, Docket No. 910 C.D. 2022, Order entered July 31, 2023.