



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

IN REPLY PLEASE
REFER TO OUR FILE

February 4, 2025

Docket Nos. A-2025-3052745 & A-2025-3052747

Utility Codes 212285 & 210610

ERIN K FURE ESQUIRE
PENNSYLVANIA AMERICAN WATER COMPANY
852 WESLEY DRIVE
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ERIC E CUMMINGS ESQUIRE
THE CUMMINGS LAW FIRM LLC
207 EAST MARKET STREET
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RE: Joint Application of Pennsylvania-American Water Company and Corner Water Supply & Service Corporation for approval of: (1) the transfer by sale, of certain water service facilities from Corner Water Supply and Service Corporation to Pennsylvania-American Water Company; (2) the abandonment by Corner Water Supply & Service Corporation of water service to the public in Elk and Paint Townships, Clarion County; and (3) Pennsylvania-American Water Company's right to begin to offer, render, furnish or supply water service to the public in additional portions of Elk and Paint Townships, Clarion County, Pennsylvania at Docket Nos. A-2025-3052745 & A-2025-3052747

Dear Attorneys Fure and Cummings:

On December 31, 2024, Pennsylvania-American Water Company (PAWC) and Corner Water Supply & Service Corporation (Corner Water) (together, Applicants), filed the above-referenced documents (Joint 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

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
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

Joint Application of Pennsylvania-American Water Company and Corner Water Supply & Service Corporation for approval of: (1) the transfer by sale, of certain water service facilities from Corner Water Supply and Service Corporation to Pennsylvania-American Water Company; (2) the abandonment by Corner Water Supply & Service Corporation of water service to the public in Elk and Paint Townships, Clarion County; and (3) Pennsylvania-American Water Company's right to begin to offer, render, furnish or supply water service to the public in additional portions of Elk and Paint Townships, Clarion County, Pennsylvania at Docket Nos. A-2025-3052745 & A-2025-3052747

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 detailed breakdown, by major plant account, of the Corner Water Supply and Service Corporation (Corner Water) facilities that Pennsylvania-American Water Company (PAWC) intends to acquire, including a description of the facility's quantity, material, size, and date installed.
- A-2 Please provide a description of the method of valuation PAWC used to determine the value of the facilities to be acquired and indicate if PAWC intends to complete an original cost, plant-in-service study of the facilities to be acquired.
- A-3 Please clarify if PAWC and Corner Water are affiliated and whether all negotiations were conducted at arm's length.
- A-4 Please provide copies of Corner Water's two most recent Federal Income Tax Returns. If operating income reflects a loss, please provide a detailed explanation of the source of funds PAWC will use to subsidize the estimated losses in support of future viability.
- A-5 In the Joint Application's Appendix O, PAWC identified its estimated annual revenue and expenses for the first year of providing service within the requested service territory. Please provide calculations quantifying the projected figures.
- A-6 In Sections 21.a.(1)-(2) of the Joint Application, the Applicants indicated that PAWC will tie-in and integrate Corner Water's system into PAWC's Clarion regional water system and that the existing wells can be eliminated. However, the Joint Application is silent on when and how Corner Water's system would be connected to PAWC's Clarion regional system (Proposed Facilities) and if PAWC would operate Corner Water's existing facilities prior to the interconnection with its existing facilities. Please provide responses to the following:
 - a. Provide a detailed breakdown, by major plant account, of the anticipated sizes, quantities, and materials of the Proposed Facilities;
 - b. Provide a detailed cost estimate, by major plant account, for the construction of the Proposed Facilities;
 - c. Provide an estimated timeline by which the requested service territory would receive water service through the Proposed Facilities;

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- d. Provide a statement as to if and how PAWC intends to operate the existing Corner Water facilities prior to connection with PAWC's existing facilities;
 - e. Provide a description of the cost of any anticipated repairs that would be required for PAWC to operate Corner Water's existing facilities in compliance with Safe Drinking Water Act (35 P.S. §§ 721.1-721.17) prior to the completion of the Proposed Facilities;
 - f. Provide a description of the sources of funding that would be used to finance the installation of Proposed Facilities; and
 - g. Provide a description of any permits, easements, or rights-of-way required to construct, operate, and maintain the Proposed Facilities and separately, identify the estimated costs.
- A-7 In Section IV of the Joint Application, the Applicants indicated that PAWC will replace all transferred customer meters within the system. Please quantify the estimated costs, itemized by each meter size, and a tentative installation schedule for these meter replacements.
- A-8 In Section IV of the Joint Application, the Applicants indicated that PAWC has a tentative five-year plan for upgrades to the Corner Water system totaling over \$4.3 million. Please provide a detailed description of these tentative upgrades, including a breakdown by major plant account, of the proposed upgrades, estimated costs, and tentative installation schedule.
- A-9 Please provide a copy of all Corner Water public water supply permits.
- A-10 Please provide evidence that PAWC's Clarion regional system has adequate treatment, transmission, and distribution capacity to provide water service to current and future customers within the requested service territory.
- A-11 Please identify any upgrades to PAWC's Clarion regional system that will be required to provide adequate treatment, transmission, and distribution capacity to current and future customers within the requested service territory and quantify the cost of these upgrades.
- A-12 Please quantify the estimated number of connections and daily water demand of customers within Corner Water's certificated service territory, by customer class and year, over the next five years.

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- A-13 Please provide a copy of the certificate(s) of the certified operator(s) PAWC intends to assign to the facilities being acquired.
- A-14 The Joint Application's Appendix B consisted of a *pro forma* tariff supplement (Tariff Supplement) that incorporated the existing rates of Corner Water. Revised Page 29 of the Tariff Supplement identified the service charges applicable to various connection sizes for private fire service. However, the Tariff Supplement does not indicate if the stated service charges are monthly, quarterly, or annual charges. Please provide a revised Appendix B to correct this deficiency.
- A-15 Please provide evidence Corner Water filed a Security Planning and Readiness Self-Certification Form with the Commission. This form and instructions for filing can be found on the Commission's website at <https://www.puc.pa.gov/filing-resources/forms/waterwastewater-forms/>.