
Megan E. Rulli

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File #: 209067

February 3, 2025

VIA ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Petition of Aqua Pennsylvania Wastewater, Inc. For Approval of its Third Long-Term Infrastructure Improvement Plan
Docket No. P-2024-3052037**

Dear Secretary Chiavetta:

Enclosed, on behalf of Aqua Pennsylvania Wastewater, Inc. (“Aqua PA”), is information being supplied to the Pennsylvania Public Utility Commission’s (“Commission”) Bureau of Technical Utility Services (“TUS”) in response to TUS Set I Data Requests regarding the above-captioned proceeding.

Respectfully submitted,



Megan E. Rulli

MER/dmc
Attachment

cc: Ken Shaffer (*via email; w/attachment*)
Certificate of Service

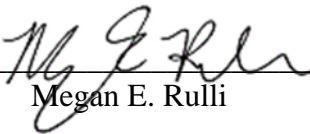
CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 PA. Code § 1.54 (relating to service by a Participant) and 52 Pa. Code § 121.4(a) (requiring service of Long Term Infrastructure Improvement Plan to be served on all parties to the utility's last base rate proceeding).

VIA E-MAIL

Christy Appleby, Esquire
Katherine Kennedy, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
Cappleby@paoca.org
kkennedy@paoca.org

Dated: February 3, 2025



Megan E. Rulli

PETITION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. P-2024-3052037

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-I-1 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.² 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.

RESPONSE

The Company disagrees with the Bureau of Technical Utility Services’ statement in the above TUS-I-1 which states that 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. [footnote omitted] 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.”

The Commission has made no such finding in an Order issued by the Commission. The Company’s current base rate case is still pending before the Commission where the Commission will determine the ratemaking treatment and rates for the East Whiteland system. To the extent that the Commission specifically finds that the East Whiteland assets are not jurisdictional, or otherwise determines that East Whiteland customers are not subject to the DSIC, the Company will amend its LTIP to remove the East Whiteland projects.

PETITION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. P-2024-3052037

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

- TUS-I-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.

RESPONSE

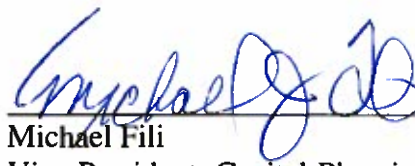
As stated in the LTIP the Company does coordinate with local governments when it is able. In wastewater operation and maintenance, a significant amount of work occurs through trenchless repair, and as such, the Company does not have to coordinate road openings and paving schedules as frequently in our service territories since often access is through an existing manhole. For any project that requires road opening the Company coordinates with the municipality through the permitting process. As an example, APW and its parent company Aqua Pennsylvania, Inc. coordinated a sewer and water main replacement in Media Borough, Delaware County, PA such that the sewer and water mains were completed in the same road opening. The Company coordinated with Media Borough on its paving schedule for these replacements. The Company also provides letter to customers if the work will affect the availability of service. Often, when road opening is required for sewer work, it is due to emergency maintenance or repair where coordination is not feasible.

For complex projects APW meets with municipalities and/or homeowners associations in the year that a construction project is taking place to discuss the upcoming large project. At those meetings future plans are also discussed. Since projects can shift due to schedules and changes in prioritization, those meetings

are scheduled as a project moves forward. In addition, on complex larger projects, the Company has submitted plans through Coordinate PA as part of the PA One Call system.

VERIFICATION

I, Michael Fili, Vice President, Capital Planning, Design, & Construction of Aqua Pennsylvania Wastewater, Inc., hereby state that the facts set forth in Aqua Pennsylvania Wastewater, Inc.'s responses to the Bureau of Technical Utility Services TUS Data Request 1 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).



Michael Fili
Vice President, Capital Planning, Design, &
Construction
Aqua Pennsylvania Wastewater, Inc.

Dated: February 3, 2025

VERIFICATION

I, William C. Packer, Vice President, Regulatory Accounting and Regional Controller of Aqua Pennsylvania Wastewater, Inc., hereby state that the facts set forth in Aqua Pennsylvania Wastewater, Inc.'s responses to the Bureau of Technical Utility Services TUS Data Request 1 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).



William C. Packer
Vice President, Regulatory Accounting and
Regional Controller
Aqua Pennsylvania Wastewater, Inc.

Dated: February 3, 2025