



February 19, 2025

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**VIA ELECTRONIC FILING**

**PUBLIC VERSION**

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

**In re: Joint Application of Pennsylvania-American Water Company and Corner Water Supply and Service Corporation Pursuant to Section 1102 of the Public Utility Code, for approval of (1) the transfer to Pennsylvania-American Water Company, by sale, of all property of Corner Water Supply and Service Corporation used and useful in the public service; (2) the right of Pennsylvania-American Water Company to begin to offer, render, furnish and supply water service to the public in portions of Elk and Paint Townships in Clarion County, Pennsylvania, and (3) the abandonment by Corner Water Supply and Service Corporation of all water service  
Docket No. A-2025-3052745 & A-2025-3052747**

Dear Secretary Chiavetta:

In response to your letter of February 4, 2025, attached for filing are Pennsylvania-American Water Company's responses to Data Request Set II, regarding the above captioned proceeding. Please note, multiple attachments are **CONFIDENTIAL** and will be filed on the Commission's SharePoint site.

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

cc: All Parties on the attached Certificate of Service (*via electronic mail*)  
Clinton McKinley, Bureau of Technical Utility Service (*via electronic mail*)



Respectfully Submitted,



Erin K. Fure, Esquire (PA ID #312245)  
Pennsylvania-American Water Company  
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***Attorney for Pennsylvania-American  
Water Company***

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

**PAWC's Response to Bureau of Technical Utility Services – Set II**

**A-16.** The map provided in the Joint Application as Confidential Appendix M does not include the information required under Sections 3.501(a)(2)(i) through (v) the Pennsylvania Code 52 Pa. Code §§ 3.501(a)(2)(i) – 3.501(a)(2)(v) and does not depict the route or location of Corner Water Supply & Service Corporation's (Corner Water's) existing facilities, the proposed interconnection (Proposed Facilities), or Pennsylvania-American Water Company's (PAWC's) existing water facilities. Please revise the Joint Application's Appendix M to include a map of suitable scale that depicts the location or route of Corner Water's existing facilities, the Proposed Facilities, and PAWC's existing water facilities in relation to the Proposed Facilities and that identifies the pipe sizes and materials, major facilities; the elevations of major facilities, and service area boundaries.

**Response:** PAWC has revised the Joint Application's Appendix M to include a map that depicts the location of Corner Water's service area and facilities in relation to PAWC's existing water facilities and the Proposed Facilities (PRV Station and new water main). The map identifies major facilities, major pipe sizes and materials (with exception of Corner Water's distribution pipe since exact locations are not known), elevations of major facilities, and the service area boundaries. The revised map is included as **CONFIDENTIAL Attachment A-16-a**.

**Responsible Witness:** Tracy Baer, P.E., Senior Manager – Business Development  
Pennsylvania-American Water Company

Jed A. Fiscus, P.E. Engineering Manager – Product Delivery  
Pennsylvania-American Water Company

**Date:** February 19, 2025

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

**PAWC's Response to Bureau of Technical Utility Services – Set II**

**A-17.** 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.

**Response:** Please refer to Attachment A-1-a. Please note that much of the documentation related to the Corner Water facilities was destroyed in the 2017 fire that occurred at the Corner Water Office Building at 113 Oakwood Lane. A substantial amount of information, particularly related to the water mains and distribution system (pipe sizes, dates of installation and material of construction) was destroyed. General information was obtained through discussions with Corner Water personnel during PAWC's various site visits. The water treatment plant, chemical feed systems, pumping, and storage system data was obtained either directly from Corner Water on site visits or from their Water Supply permits and permit applications.

**Responsible Witness:** Tracy Baer, P.E., Senior Manager – Business Development  
Pennsylvania-American Water Company

**Date:** February 19, 2025

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

**PAWC's Response to Bureau of Technical Utility Services – Set II**

**A-18. Schedule 4.1(k)(i) of the APA referenced Corner Water's effective tariff to identify applicable refund arrangements. Please provide a complete copy of Corner Water's effective tariff and identify any refund arrangements that would require future payment by PAWC.**

**Response:** Due to the 2017 fire that occurred at the Corner Water Office Building at 113 Oakwood lane, much documentation held by Corner Water was destroyed. Corner Water is in the process of locating a complete copy of its effective tariff. The parties will supplement the response to this data request once the complete tariff is obtained.

There are no refund arrangements offered by Corner Water that would require future payment by PAWC.

**Responsible Witness: Thomas Weaver, President, Corner Water Supply and Service Corporation**

**Date: February 19, 2025**

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

**PAWC's Response to Bureau of Technical Utility Services – Set II**

**A-19.** Schedule 4.1(1)(i) of the APA identified the rights in real property and leases to be transferred from Corner Water to PAWC as a result of the transaction, including: (1) 113 Oakwood Lane, Shippenville, PA, 16254, Parcel ID 21-024-055-000-00, (113 Oakwood Lane); and (2) 393 Weaver Lane, Shippenville, PA, 16254, Parcel ID 08-010-235-002-00, (393 Weaver Lane). Please clarify what rights in these properties are being transferred to PAWC (e.g., leasing rights or fee simple ownership).

**Response:** These properties are being transferred to PAWC in fee simple ownership.

**Responsible Witness:** Thomas Weaver, President, Corner Water Supply and Service Corporation

**Date:** February 19, 2025

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

**PAWC's Response to Bureau of Technical Utility Services – Set II**

**A-20.** Schedule 4.1(l)(ii) of the APA consisted of a table listing easements and rights of way (Easement and ROW Table) to be transferred to PAWC as part of the transaction. The Easement and ROW Table listed several parcel numbers with Corner Water as the Grantee (21-024-055-000-00, 21-022-081-000-00, and 08-020-001-001-00). However, these parcels were not identified as assets excluded from the sale on the list of excluded assets on Page 59 of 81 of the APA. Please clarify if the parcels listed with Corner Water as the Grantee are excluded from the sale to PAWC or, if these parcels will be transferred to PAWC, explain why an easement or right of way is required.

**Response:** For the real property located at 113 Oakwood Lane, there are two parcels. One belongs to Corner Water and will be conveyed to PAWC in fee simple at closing. The other belongs to a separate entity and that parcel will not be transferred to PAWC at close. Corner Water holds easements that run with the parcel that will not be conveyed to PAWC, and Corner Water will transfer those easements to PAWC at close.

**Responsible Witness:** Thomas Weaver, President, Corner Water Supply and Service Corporation

**Date:** February 19, 2025

**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**  
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**PAWC's Response to Bureau of Technical Utility Services – Set II**

**A-21.**           **Schedule 4.1(l)(v) consisted of a list of all impending taxes, levies and assessments that are due and owing after the Closing Date. However, no assessed value was provided for 113 Oakwood Lane property. Please provide an updated Schedule 4.1(l)(v) that identifies the assessed value for 113 Oakwood Lane and identify the entity responsible to pay any taxes, levies, and assessments for the properties identified, following the close of this transaction.**

**Response:**    Corner Water is the process of obtaining an assessment of 113 Oakwood Lane. Corner Water will supplement the response to Data Request A-21 once it has obtained the assessment.

**Responsible Witness:**       **Thomas Weaver, President, Corner Water Supply and Service Corporation**

**Date:**                       **February 19, 2025**

**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**  
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**PAWC's Response to Bureau of Technical Utility Services – Set II**

**A-22. Exhibit A, Form of Assignment of Contracts Agreement, of the APA referenced an attached Exhibit A that is to identify assigned contracts, agreement, and arrangements. However, a copy of Exhibit A was not attached. Please provide a copy of Exhibit A to APA's Exhibit A.**

**Response:** Exhibit A, Form of Assignment of Contracts Agreement, is a pro forma agreement that will be used as the template for the Assignment of Contracts Agreement to be executed pursuant to the APA. The Joint Applicants are seeking, but have not yet been granted, Commission approval to complete the transactions contemplated within the APA. Exhibit A to the Assignment of Contracts Agreement will identify the contractual rights Corner Water agreed to sell, assign and transfer to PAWC at the closing of the transaction. Exhibit A to the Assignment of Contracts Agreement is contemplated to be created and attached to the Assignment of Contracts Agreement following the receipt of Commission approval to proceed under the terms of the APA and closer in time to the close of the transaction.

**Responsible Witness: Tracy Baer, P.E., Senior Manager – Business Development  
Pennsylvania-American Water Company**

**Date: February 19, 2025**

**VERIFICATION**

I, Thomas Weaver, hereby state that the facts set forth in the attached Responses 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.

*Thomas Weaver*

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Thomas Weaver, President  
Corner Water Supply and Service Corporation

Dated: 2-19-25

## VERIFICATION

I, Tracy Baer, P.E., hereby state that the facts set forth in the attached Responses 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.



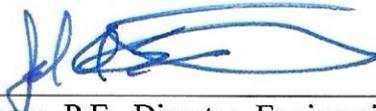
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Tracy Baer, P.E., Senior Manager – Business Development  
Pennsylvania-American Water Company

Dated: 2/19/25

## VERIFICATION

I, Jed Fiscus, P.E., hereby state that the facts set forth in the attached Responses 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.



Jed A Fiscus, P.E., Director, Engineering Project Delivery  
Pennsylvania-American Water Company

Dated: 2/19/25