



**Erin K. Fure**  
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March 12, 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 **Supplemental Response** to Data Request Set I, Question 8 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 (*via electronic mail*)  
Clinton McKinley, Bureau of Technical Utility Services (*via electronic mail*)  
James P. Kelly (*via electronic mail*)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>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</b>	: : : : : : :	<b>Docket Number A-2024-3052459</b>
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**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving the above-referenced Supplemental Response 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 March 12, 2025**

Darryl A. Lawrence, Interim Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
*(via electronic mail)*

NazAarah Sabree, Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> 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](mailto: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**

**A-8.** In Paragraph 21 of the Application, PAWC-WD indicated that it will charge its existing Rate Zone 1 rates for service. Please clarify if PAWC-WD intends to charge Rate Zone 1 metered rates within the requested service territory.

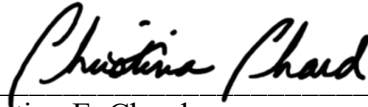
**Supplemental Response:** Customers will be charged under Rate Zone 1 metered wastewater rates in the requested service territory.

**Responsible Witness:** **Dr. Christina E. Chard, Senior Director of Rates and Regulatory American Water Works Service Company, Inc.**

**Date:** **March 12, 2025**

## VERIFICATION

I, Dr. Christina E. Chard, hereby state that the facts above set forth in the attached Response is 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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Dr. Christina E. Chard  
Senior Director of Rates and Regulatory  
American Water Works Service Company, Inc.

Dated: 3/12/2025