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March 19, 2025

*Via Electronic Filing*

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, 2<sup>nd</sup> Floor (filing room)  
Harrisburg, PA 17120

RE: Petition of Columbia Water Company for Approval of its Lead Service Line Replacement Program, Modification of its Long-Term Infrastructure Improvement Plan and Waiver of Commission Regulations Regarding Termination Requirements; Docket No. P-2023-3041845; **RESPONSES TO THE BUREAU OF TECHNICAL UTILITY SERVICES DATA REQUESTS, SET 2**

Dear Secretary Chiavetta:

Enclosed are Columbia Water Company's Responses to the Bureau of Technical Utility Services' Data Requests, Set 2 in the above-referenced proceeding.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (717) 236-1300.

Very truly yours,

*/s/ Whitney E. Snyder*

Whitney E. Snyder  
Thomas J. Sniscak

*Counsel for Columbia Water Company*

WES/das  
Enclosure

cc: Matthew T. Lamb, P.E., BTUS ([mlamb@pa.gov](mailto:mlamb@pa.gov))  
Per Certificate of Service

Petition of Columbia Water Company for Approval of its Lead Service Line Replacement Program, Modification of its Long-Term Infrastructure Improvement Plan and Waiver of Commission Regulations Regarding Termination Requirements;  
Docket No. P-2023-3041845

**COLUMBIA WATER COMPANY'S RESPONSES TO  
THE BUREAU OF TECHNICAL UTILITY SERVICES' DATA REQUESTS, SET 2**

P-11. In Columbia Water's response to Data Request P-8, Columbia Water indicated that it had filed with the Commission's Secretary's Bureau (Secretary's) a copy of its service line inventory (SLI) in a live electronic spreadsheet format as an Excel file (2023 SLI File) entitled "Service Line Inventory – 8-31-2023". However, the Commission did not receive a copy of the 2023 SLI File. The Commission notes that an Excel file can be filed through the Secretary's Share Point File system to ensure the timely filing of your submission. Please file a copy of Columbia Water's SLI in a live electronic spreadsheet format.

**RESPONSE:** Current Service Line Inventory excel sheets were uploaded to the Secretary's Bureau on March 10, 2025

**PROVIDED BY:** David T. Lewis

**DATE:** March 19, 2025

Petition of Columbia Water Company for Approval of its Lead Service Line Replacement Program, Modification of its Long-Term Infrastructure Improvement Plan and Waiver of Commission Regulations Regarding Termination Requirements;  
Docket No. P-2023-3041845

**COLUMBIA WATER COMPANY'S RESPONSES TO  
THE BUREAU OF TECHNICAL UTILITY SERVICES' DATA REQUESTS, SET 2**

- P-12. Pursuant to the Commission's Opinion and Order entered November 1, 2024, Columbia Water filed with the Commission on November 14, 2024, a copy of its Lead Service Line Replacement Plan (LSLR Plan) and Pro Forma Tariff Supplement No. \_\_\_ to Tariff Water – Pa. P.U.C. No. 7 (Pro Forma Tariff). The Pro Forma Tariff, Section 28.(3), indicated that Columbia Water's LSLR Plan is in effect until September 2028. However, the LSLR Plan's Section 1 identified that Columbia Water intends to determine a minimum cumulative average of 10.0% of the initial unknown service materials annually, and the LSLR Plan's Section 2 identified that Columbia Water determined its LSLR projections by estimating the total number of LSLs to be less than 400. Therefore, Columbia Water's LSLR Plan does not demonstrate that Columbia Water will replace all LSLs under its LSLR Plan by the September 2028 date included in the Pro Forma Tariff, or identify how Columbia Water would address any LSLs replaced after that date in compliance with its tariff, Commission regulations, and the Public Utility Code. The Commission notes that Columbia Water's LSLR Program, upon approval by the Commission, will remain effective indefinitely and cannot be terminated or modified except by Commission Order. Please respond to the following:
- a. Provide a revised Pro Forma Tariff that removes Columbia Water's statement in Section 28.(3) that Columbia Water's LSLR Plan is in effect until September 2028; and
  - b. Based on Columbia Water's plan to identify, at a minimum, a cumulative average of 10% of the initial unknown service materials annually, provide a projected date when Columbia Water intends to have its service line inventory complete.

**RESPONSE:** Attached is a revised Pro Forma Tariff that removes the in-effect-until date in Section 28.(3).

The Company intends to have the inventory completed within 10 years.

**PROVIDED BY:** David T. Lewis

**DATE:** March 19, 2025

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**COLUMBIA WATER COMPANY'S RESPONSES TO  
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P-13. The Pro Forma Tariff's Section 28.(4), LSLR Annual Cap, indicated Columbia Water will cap LSLR Projects at 25 customer-owned LSLRs or \$125,000, whichever is less, on an annual basis. However, pursuant to 66 Pa.C.S. § 1311(b)(2)(vi), a new tariff or supplement to an existing tariff approved by the commission under subparagraph (v) shall include a cap on the maximum number of customer-owned lead water service lines that can be replaced annually. Additionally, Commission regulations under 52 Pa. Code § 65.58(a) require an entity's pro forma tariff or tariff supplement include a cap on the number of customer-owned LSLs that can be replaced annually. The Commission notes that neither the Commonwealth's Public Utility Law nor the Commission's regulation allows the inclusion of a monetary cap on LSLRs in the Pro Forma Tariff. Please provide a revised Pro Forma Tariff that removes Columbia Water's inclusion of a monetary cap on LSLRs (e.g., or \$125,000, whichever is less) from Section 28.(4).

**RESPONSE:** Neither the Public Utility Code nor the Commission's regulations prohibit utilizing a monetary cap in conjunction with a cap on the maximum number of customer-owned lead water service lines. The Company notes the monetary cap was a bargained for piece of the Commission-approved Settlement Agreement in this matter. When the Commission ordered the Company to submit documents for compliance, the Company interpreted that provision as requiring compliance with the Commission-approved Settlement. The Company does not believe the Bureau of Technical Services has the power or authority to upend material settlement terms already approved by the Commission. As such, the Company does not intend to make the requested change.

**PROVIDED BY:** David T. Lewis

**DATE:** March 19, 2025

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**COLUMBIA WATER COMPANY’S RESPONSES TO  
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P-14. The Pro Forma Tariff’s Section 28.(8), Non-Owner Occupied Properties, provided the following language “[t]he Company may provide the Customer with the option to execute a consent form for the LSL replacement and, upon execution of the Customer consent form, is authorized by this Tariff, which has the force and effect of law, to proceed to make the replacement without obtaining authorization from the property owner. The Company’s replacement in this circumstance without the property owner’s consent is in furtherance of the Company’s duty pursuant to the Public Utility Code to provide safe and reasonable service and shall not constitute a violation of law or constitute any tort or other criminal or civil liability.” Additionally, in Columbia Water’s response to Data Request P-7, Columbia Water referenced the *Implementation of Chapter 32 of the Public Utility Code Regarding Pittsburgh Water and Sewer Authority - Stage 1 Petition of Pittsburgh Water and Sewer Authority for Approval of Its Long-Term Infrastructure Improvement Plan* at Docket No. M-2018-2640802, as justification for this provision. The Commission notes that Columbia Water is a privately-owned entity and may not be able to structure its LSLR Program in the same fashion as Pittsburgh Water and Sewer Authority, which is a public municipal corporation. Specifically, Columbia Water is proposing that the Customer, as the tenant, in executing the consent form would assume the liability of the Company’s LSLR activities on property not owned by the Customer. Columbia Water detailed in its revised LSLR Plan, Non-Owner Occupied Premises, that in such circumstances the Company may proceed to make the replacement without obtaining authorization from the property owner. Please submit a revised Pro Forma Tariff that aligns with the language provided in the revised LSLR Plan as such: “the Company may proceed to make the replacement without obtaining authorization from the property owner. In any such instance of replacement, the Company, and any individual associated with the Company, including but not limited to employees, agents, board members and executives, are released and held harmless from any and all claims, causes of action, damages or losses, of any nature whatsoever with respect to the work performed but the Company or its contractors, and shall not be otherwise liable for any claim asserted by any person, including the property owner, as a result of the LSLR except to the extent otherwise authorized by the Tariff. In any instance where the Company cannot, in its sole judgement, reasonably make safe entry to the property service may be terminated until the property owner provides consent and provides safe access to said property.”

**RESPONSE:** Please see attached revised Pro Forma Tariff.

**PROVIDED BY:** David T. Lewis

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Petition of Columbia Water Company for Approval of its Lead Service Line Replacement Program, Modification of its Long-Term Infrastructure Improvement Plan and Waiver of Commission Regulations Regarding Termination Requirements;  
Docket No. P-2023-3041845

**COLUMBIA WATER COMPANY'S RESPONSES TO  
THE BUREAU OF TECHNICAL UTILITY SERVICES' DATA REQUESTS, SET 2**

- P-15. In the LSLR Plan's Planning and Replacements Section, Columbia Water indicated it set an annual cap of 25 customer-owned LSLRs per year or \$125,000, whichever is less.

Additionally, Columbia Water estimated the total number of LSLs to be less than 400 and indicated that it would adjust its annual projection as necessary after all existing records have been inventoried. Based on Columbia Water's annual cap of 25 customer-owned LSLRs per year and the projected total number of LSLs to be 400, it appears the projected number of years required to replace all customer-owned lead service lines (COLSLs) would be approximately 16 years ( $400 \text{ LSLs} \div 25 \text{ LSLRs/year}$ ). The Commission notes that an entity can have a higher annual LSLR cap in its tariff than it first plans to complete annually, as detailed in its LSLR Plan, to allow the entity to increase the number of COLSLs in a LSLR Plan Update without requiring a rate case to make a tariff change. Additionally, the United States Environmental Protection Agency's (EPA's) Lead and Copper Rule Improvements (LCRI) finalized October 8, 2024, and effective December 31, 2024, is requiring the removal of all LSLs by December 31, 2037. Please provide responses to the following:

- a. Clarify whether the annual cap of 25 customer-owned LSLRs in the LSLR Plan, and separately in the Pro Forma Tariff, is sufficient to meet the requirements of the removal of LSLs as detailed in the LCRI, and specifically the LCRI required cumulative average annual replacement rate starting at the end of December 31, 2030; and
- b. If meeting the requirements of the LCRI requires changes to Columbia's LSLR Program, provide a revised LSLR Plan, modified LTIP, and/or Pro Forma Tariff that identifies the annual cap and, where applicable, a maximum budgeted amount necessary for Columbia Water to replace all LSLs inclusive of GRR within a calculated period of time but within the deadline established by the LCRI.

**RESPONSE:**

Columbia Water's LSLR Plan is sufficient to meet requirements for removal of LSLs consistent with the LCRI. Columbia Water remains committed to replacing all lead service lines in its territory on required timelines. Consistent with Columbia Water's updated Service Line Inventory, Columbia Water now estimates a maximum of 200 lead service lines total within its territory. Twenty five services lines per year will complete replacement of lead services lines within approximately 8 years and Columbia Water will thus be compliant with the cumulative average replacement rule when it takes effect in 2030.

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Meeting the cumulative average portion of the LCRI does not require a change to Columbia Water's LSLRP or tariff.

Moreover, the Company notes the validity of the LCRI is being contested in court by the American Water Works Association, it is unlikely the Trump Administration will defend or enforce the LCRI, and at least one Joint Resolution has been introduced in the U.S. House of Representatives to disapprove the LCRI. As such, the Company believes consideration now of LCRI compliance in 2030 is premature.

**PROVIDED BY:** David T. Lewis

**DATE:** March 19, 2025

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**COLUMBIA WATER COMPANY'S RESPONSES TO  
THE BUREAU OF TECHNICAL UTILITY SERVICES' DATA REQUESTS, SET 2**

- P-16. In the LSLR Plan's Planning and Replacements Section, Columbia Water indicated that prior to the work being initiated, Columbia Water will contact customers within an LSLR Project Area at least two times over the six-month period once an LSLR Project Area has been identified, or until the customer responds to the Columbia Water, whichever is sooner, to determine whether there are COLSLs and to verify the presence of COLSLs. However, the LCRI indicates that if property owner consent is required for access, water systems must make a "reasonable effort" to obtain this consent. Under the LCRI, a "reasonable effort" is at least four attempts to engage the property owner using at least two different communication methods (e.g., in-person conversation, phone call, text message, email, written letter, postcard, or door hanger). Please respond to the following:
- a. Explain how Columbia Water's processes and procedures to obtain acceptance of a LSLR prior to LSLR project commencement complies with a reasonable effort as defined in the LCRI; and
  - b. If meeting the requirements of the LCRI requires changes to Columbia's LSLR Program, provide a revised LSLR Plan that incorporates the LCRI's reasonable effort requirements.

**RESPONSE:** See attached revised LSLR Plan.

**PROVIDED BY:** David T. Lewis

**DATE:** March 19, 2025

Petition of Columbia Water Company for Approval of its Lead Service Line Replacement Program, Modification of its Long-Term Infrastructure Improvement Plan and Waiver of Commission Regulations Regarding Termination Requirements;  
Docket No. P-2023-3041845

**COLUMBIA WATER COMPANY'S RESPONSES TO  
THE BUREAU OF TECHNICAL UTILITY SERVICES' DATA REQUESTS, SET 2**

P-17. Pursuant to the Commission's Opinion and Order entered November 1, 2024, Columbia Water filed with the Commission, on November 14, 2024, a copy of its Modified Long-Term Infrastructure Improvement Plan 2023 – 2027 (Modified LTIIIP). In the Modified LTIIIP's Introduction, Columbia Water indicated that it served approximately 12,154 customers at the end of year 2022. Please provide a revised Modified LTIIIP that includes the current number of customers served by Columbia Water at the end of November 2024.

**RESPONSE:** Attached is a revised Modified LTIIIP showing the number of customers served by Columbia Water at the end of November 2024 as 12,230.

**PROVIDED BY:** David T. Lewis

**DATE:** March 19, 2025

Petition of Columbia Water Company for Approval of its Lead Service Line Replacement Program, Modification of its Long-Term Infrastructure Improvement Plan and Waiver of Commission Regulations Regarding Termination Requirements;  
Docket No. P-2023-3041845

**COLUMBIA WATER COMPANY'S RESPONSES TO  
THE BUREAU OF TECHNICAL UTILITY SERVICES' DATA REQUESTS, SET 2**

P-18. In the Modified LTIP's Introduction and Section 1, Types and Age of Eligible Property, Tables 1 and 2, Columbia Water indicated that it owns approximately 722,890 linear feet (LF) of water mains, 10,407 company-owned service lines, 3,535 valves, 978 hydrants, and 10,407 meters for the period covering 1875 through 2023, not including the East Donegal Rate District. However, Columbia Water previously indicated that it owned approximately 722,890 LF of water mains, 10,407 company-owned service lines, 3,535 valves, 978 hydrants, and 10,407 meters for the period covering 1875 through 2021 in Columbia Water's 2nd LTIP filed on August 26, 2022, at Docket No. P-2022-3034702. Consequently, there appears to be no change in Columbia Water's eligible property between 2021 and 2023. Please provide responses to the following:

- a. Clarify whether there has been any change in Columbia Water's eligible property (e.g., the length of water mains and/or the quantities of company-owned service lines, valves, hydrants, and meters) between 2021 through 2024; and
- b. If so, provide a revised Modified LTIP that includes any changes to Columbia Water's eligible property by type.

**RESPONSE:** The Company's Annual Asset Optimization Plans list the Water Company's eligible property. Attached is a revised Modified LTIP updating the Water Company's eligible property to 12/31/2024.

**PROVIDED BY:** David T. Lewis

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Petition of Columbia Water Company for Approval of its Lead Service Line Replacement Program, Modification of its Long-Term Infrastructure Improvement Plan and Waiver of Commission Regulations Regarding Termination Requirements;  
Docket No. P-2023-3041845

**COLUMBIA WATER COMPANY'S RESPONSES TO  
THE BUREAU OF TECHNICAL UTILITY SERVICES' DATA REQUESTS, SET 2**

- P-19. In the Modified LTIIIP's Section 1, Tables 3 and 4, Columbia Water indicated that there are 12,051 and 12,050 company-owned and customer-owned service lines, respectively, included as eligible property under the LSLR Plan and the Modified LTIIIP. Additionally, in the Modified LTIIIP's footnote No. 4, Columbia Water also indicated that the East Donegal Rate District does not have a DSIC. As a result, Columbia Water has not included East Donegal capital improvements in its DSIC. Similarly, LSLR costs that are attributable to the East Donegal system will not be recovered through the DSIC. Columbia Water, however, reserved the right to request Commission approval to apply the DSIC to the East Donegal Rate District and recover these LSLR costs and all other DSIC-eligible costs attributable to the East Donegal Rate District through the DSIC. Please respond to the following:
- a. Explain the discrepancy between the number of company-owned service lines enumerated as 10,407 in Table 1 and as 12,051 in Tables 3 and 4;
  - b. Clarify whether Columbia Water included the East Donegal Rate District as eligible property in the total number of company-owned and customer-owned service lines included in Tables 3 and 4;
  - c. If so, explain the discrepancy between the inclusion of the East Donegal Rate District service lines and the Modified LTIIIP's footnote No. 4 where Columbia Water indicated that LSLR costs that are attributable to the East Donegal system will not be recovered through the DSIC; and
  - d. If East Donegal system assets are included in Tables 3 and 4, provide a revised Modified LTIIIP that includes only the company-owned and customer-owned service lines to the extent those service lines are made of lead materials or GRR which excludes East Donegal Rate District property.

**RESPONSE:**

- a. As noted under Table 1, the 10,407 company-owned service lines listed do not include the East Donegal company-owned service lines.
- b. Yes, Columbia Water included the East Donegal Rate District as eligible property in the total number of company-owned and customer-owned service lines included in Tables 3 and 4.
- c. East Donegal lead service line replacements remain eligible property, regardless of whether these replacements are recovered through the DSIC. The Commission's regulations are clear that the Company's LSLR plan is to be included in its LTIIIP, not solely the portions of the LSLR plan Columbia Water now intends to recover through the DSIC. 52 Pa. Code

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Section 65.54(c). The law is clear that while to be recoverable in the DSIC, replaced or improved property must be included in the LTIP, however, the converse is not true. Just because property is included in an LTIP does not necessarily mean it is recoverable or will be recovered via a DSIC. Moreover, Columbia Water may seek to implement the DSIC as to East Donegal customers in the future through a proper Commission proceeding. As such, Columbia Water will not be removing East Donegal DSIC eligible property from its LTIP. Columbia Water will keep separate accounting available during the DSIC review process for the Commission to review what property has been included in each quarterly DSIC.

d. See response to c.

**PROVIDED BY:** David T. Lewis

**DATE:** March 19, 2025

# **Revised Pro Forma Tariff**

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COLUMBIA WATER COMPANY

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RATES, RULES, AND REGULATIONS GOVERNING  
THE DISTRIBUTION OF WATER IN WEST HEMPFIELD, RAPHO,  
EAST DONEGAL AND MANOR TOWNSHIPS AND  
THE BOROUGHS OF COLUMBIA AND MOUNTVILLE, AND MARIETTA  
LANCASTER COUNTY AND HELLAM TOWNSHIP, YORK COUNTY, PENNSYLVANIA

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Issued: \_\_\_\_\_

Effective: \_\_\_\_\_

By: David T. Lewis, President  
Columbia Water Company  
220 Locust Street  
Columbia, PA 17512

## **NOTICE**

THIS TARIFF SUPPLEMENT IMPLEMENTS THE COMPANY'S LEAD SERVICE LINE REPLACEMENT PROGRAM.

See Page Two

List of Changes Made by this Supplement

Change:

Tariff Supplement No. XXX implements the Company's Lead Service Line Replacement Program, which addresses the Company's efforts to replace company-owned and customer-owned Lead Service Lines. (C)

(C) Indicates Change

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Issued: \_\_\_\_\_, 202X

Effective: \_\_\_\_\_, 202X

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(I) Indicates Increase (D) Indicates Decrease (C) Indicates Change

28. Lead Service Line (LSLR) Program

(C)

(1) Supersession

This section of the Company's Tariff supersedes all other conflicting provisions of this Tariff for purposes of implementing the Company's Lead Service Line Replacement Program.

(2) Definitions

Curb Stop: A water service shutoff valve located in a water service line near the curb or edge of the street and between the water main and the building.

Company-Owned LSL – Company-Owned Lead Service Line: The portion of the lead service line extending from the Company's main to the Curb Stop.

Customer-Owned LSL – Customer-Owned Lead Service Line: The portion of the lead service line extending from the Curb Stop to the meter or one foot inside a building foundation, whichever is farther.

Galvanized Service Line: Iron or steel piping that has been dipped in zinc to prevent corrosion and rusting.

Company: Columbia Water Company.

Customer: A person or entity who is an owner or occupant and who contracts with the Company for water service.

Independent Legal Restrictions: Commission Regulations or Orders which otherwise prevent termination of water service at a property including but not limited to winter moratorium, medical certifications, or Commission directed moratoriums or suspensions.

LSL - Lead Service Line: A service line made of lead that connects the water main to a building inlet and a lead pigtail, gooseneck or other fitting that is connected to the lead line. A galvanized service line is considered a lead service line if it ever was or is currently downstream of any lead service line or service line of unknown material.

LSLR – Lead Service Line Replacement: A service line, whether Company-owned or customer-owned, installed to replace a lead service line.

LSLR Plan – Lead Service Line Replacement Plan: A plan and supporting documents submitted to and approved by the Commission that specify how the Company intends to implement its lead service line replacement program.

LSLR Project – Lead Service Line Replacement Project: A Company-scheduled lead service line replacement activity either in conjunction with main replacements or as part of a lead service line replacement plan.

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(2) Definitions (Cont'd)

LSLR Project Area – Lead Service Line Replacement Project Area: The area encompassing a Company's scheduled lead service line replacement activities, which includes the area within a 1-mile radius of a lead service line replacement project if served by the Company.

LSLR Project Commencement – Lead Service Line Replacement Project Commencement: Installation of the first lead service line replacement within a lead service line replacement project area.

Partial LSLR – Partial Lead Service Line Replacement: A lead service line replacement that does not replace both the Company-owned and customer-owned portions of a lead service line.

Property Owner Agreement: An agreement between the Company and a property owner for the replacement of a Customer-Owned LSL that allows the Company's employees and contractors to gain access to their private property in order to replace their customer-owned LSL prior to the initiation of any work by the Company to replace the customer-owned LSL.

Service Line: The pipe and appurtenances which connect any main to the Company's water meter or, if the Company's water meter is located outside of the structure or the connection is not metered by the Company, at the first shutoff valve located within the interior of the structure.

Service Line Inventory: The process of identifying each service line under the timing and direction of United States Environmental Protection Agency regulation at 40 CFR 141.1—143.20 as enforced by the Department of Environmental Protection, inclusive of future changes as those regulations may be amended.

Water Distribution System: The equipment and facilities owned or operated by the Company for diverting, developing, pumping, impounding, distributing or furnishing water to or for the public for compensation.

(3) LSLR Plan

Notwithstanding Rules in this Tariff relating to customer responsibility for customer service lines, the Company will replace Customer-Owned LSLs pursuant to its LSLR Plan (as approved at Docket No. P-2023-\_\_\_\_\_) and set forth in Section 9.0 to the Company's 5-Year Long-Term Infrastructure Improvement Plan approved at Docket No P-2023-\_\_\_\_\_, subject to an annual cap described below. The Company may modify its annual cap for Lead Service Line Replacements with Commission approval. The costs incurred by the Company to undertake remediation efforts pursuant to its Lead Service Line Replacement Plan shall be recoverable in the Company's Distribution System Improvement Charge, PENNVEST Surcharge, and in base rates, as applicable.

(C)

(C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(3) LSLR Plan (Cont'd)

The Company's Lead Service Line Replacement Plan ~~is in effect until September 2028 and~~ applies to any Lead Service Line (1) serving any customers of Columbia Water Company; (2) of which the Company is aware; (3) the replacement of which is operationally feasible; and (4) the Property Owner authorizes the replacement or replaces the line in accordance with Company policy or, the Company is otherwise authorized to replace the line in accordance with this Tariff.

(4) LSLR Annual Cap

The Company will cap LSLR Projects at 25 Customer-Owned LSLRs or \$125,000, whichever is less, on an annual basis. If a Customer reimbursement provided pursuant to this Tariff or an emergency LSLR causes Columbia Water to exceed its annual cap, Columbia Water will increase its current annual cap by the number and cost of emergency repairs and/or reimbursements and decrease its annual cap by same for the following year only.

(5) LSLR Replacements

The Company will offer to replace Customer-Owned LSLs at no direct cost to the Customer or property owner, if the Customer is not the property owner: (i) at any residential or non-residential property where the Company replaces a Company-owned main connected to a Customer-Owned LSL; (ii) at any property where the Company replaces a Company-Owned LSL connected to a Customer-Owned LSL; and (iii) at any property with a private-side only LSL located within a LSLR Project Area where LSLRs are performed; and (iv) when the Company's operations crew replaces a Company-owned facility regardless of material, in emergencies, including line breaks, leaks, or other unplanned emergency replacements, that is or is connected to a LSL.

Except in the case of non-owner occupied properties at which the Company has exercised "stand in the shoes" rights, the Company shall enter into a Property Owner Agreement with the property owner for replacement of a Customer-Owned LSL that allows the Company's employees and contractors to gain access to their private property in order to replace their customer-owned LSL prior to the initiation of any work by the Company to replace the customer-owned LSL. The Property Owner Agreement shall be in a form provided by the Company and shall include provisions that require the Property Owner(s) to release and hold harmless the Company from any and all claims, causes of action, damages or losses, of any nature, whatsoever with respect to the work performed by the Company or its contractors.

(C) Indicates Change

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28. Lead Service Line (LSLR) Program (Cont'd)

(6) Customer Refusal

Except as set forth below, if after being notified of the Company's offer to replace at no cost a Customer-Owned LSL, the property owner has not provided an executed Property Owner Agreement authorizing the replacement of the customer service line or has refused replacement, the Company will (1) provide the Customer and property owner, if the Customer is not the property owner, with a complete disclosure of the known health hazards from the continued use of a LSL, (2) inform the Customer or property owner, if the Customer is not the property owner, that refusal or failure to accept will require replacement of the Customer-Owned LSL, at the Customer or property owner's expense, within 1 year from LSLR Project commencement for the Customer or property owner, if the Customer is not the property owner, to be eligible for reimbursement and (3) communicate to the Customer and property owner, if the Customer is not the property owner, that failure to allow Columbia Water to complete the LSLR or to replace the Customer-Owned LSL concurrent with the replacing the Company-Owned LSL will lead to termination of water service prior to the Company replacing the Company-Owned LSL.

If the Customer or property owner, if the Customer is not the property owner, does not sign the Property Owner Agreement or still refuses replacement of the Customer-Owned LSL within ten days after Columbia undertakes the aforementioned steps, the Company will require the Customer or property owner, if the Customer is not the property owner, to sign a form documenting their refusal. If the Customer or property owner refuses or fails to sign the refusal form, the Company will make a record of and document the customer's refusal. The Company will then schedule to replace its portion of the Company-Owned LSL. The Company will notify the customer in writing of the partial LSLR no later than ten days prior to the scheduled replacement and that it will terminate water service at that location the day prior to replacing the Company-Owned LSL. The Company will post a termination notice at the customer property forty-eight (48) hours prior to termination. The Company will provide these notices to every resident that lives in a multi-residential building that is affected by a termination because of a LSLR refusal. The Company will then proceed with termination of water service to a location irrespective of whether Independent Legal Restrictions would otherwise delay or prohibit termination. Such notice and termination shall be deemed consistent with Chapter 14 of the Public Utility Code. Moreover, in these instances, the Company is not required to comply with termination procedures described in other portions of its tariff or the Commission's regulations.

At any time prior to completing termination, or, within ten days after termination, the property owner executes the Property Owner Agreement, water service will be restored to the property, provided that service will not be restored until either both the Company-Owned LSL and the Customer-Owned LSL have been replaced or, in the Company's sole discretion, an alternative, non-lead temporary bypass is installed.

Columbia Water will not connect an Applicant to water service where a property owner previously refused or failed to accept the utility's offer of a LSLR until the Applicant verifies that the replacement of a Customer-Owned LSL by providing a paid invoice.

(C) Indicates Change

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28. Lead Service Line (LSLR) Program (Cont'd)

(6) Customer Refusal (Cont'd)

from a licensed contractor or notarized statement from a licensed contractor attesting to completion of the LSLR

(7) Customer Lead Service Line on Multiple Properties

When the Company is undertaking an LSLR Project and the Customer-Owned LSL crosses one (or more than one) property to access another, the Company will attempt to obtain approval from all property owners to allow the work necessary to replace the Customer-Owned LSL and evaluate solutions available to install conforming service lines.

If the Company is unable to obtain the neighboring property owner or owners' consent, and there is no other viable and economic solution (to be determined in the Company's sole discretion) such as installing conforming service lines, the Company will commence procedures to terminate service to the neighboring property owner or owners' property. The Company will complete or suspend the termination of the neighboring property owner's water service as set forth in section (6) above.

(8) Non-Owner Occupied Properties

The Company may stand in the shoes of the property owner and is authorized to replace a Customer-Owned LSL when:

- i. The Company has offered pursuant to its Tariff to replace at no direct cost to the property owner a Customer-Owned LSL;
- ii. The property is not occupied by the legal owner of the property; and
- iii. The Company has made attempts to obtain authorization for the Customer LSLR pursuant to this Tariff and the LSLR Plan and (a) the legal owner cannot be identified; (b) the legal owner cannot be located; or (c) the Company has notified the legal owner but the owner has never responded.

In such instances, and when, in the sole discretion of the Company, replacing the Customer-Owned LSL and preventing the termination of water service would be reasonable and in the public interest, the Company may provide the Customer with the option to execute a consent form for the LSL replacement and, upon execution of the Customer consent form, is authorized by this Tariff, which has the force and effect of law, ~~to proceed to make the replacement without obtaining authorization from the property owner.~~ to proceed to make the replacement without obtaining authorization from the property owner. In any such instance of replacement, the Company, and any individual associated with the Company, including but not limited to employees, agents, board members and executives, are released and held harmless from any and all claims, causes of action, damages or losses, of any nature whatsoever with respect to the work performed but the Company or its contractors, and shall not be otherwise

(C) Indicates Change

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THE COLUMBIA WATER COMPANY

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SCHEDULE OF RATES APPLICABLE TO COLUMBIA RATE DISTRICT

liable for any claim asserted by any person, including the property owner, as a result of the LSLR except to the extent otherwise authorized by the Tariff. In any instance where the Company cannot, in its sole judgement, reasonably make safe entry to the property service may be terminated until the property owner provides consent and provides safe access to said property. The Company's replacement in this circumstance without the property owner's consent is in furtherance of the Company's duty pursuant to the Public Utility Code to provide safe and reasonable service and shall not constitute a violation of law or constitute any tort or other criminal or civil liability.

(I) Indicates Increase (C) Indicates Change

28. Lead Service Line (LSLR) Program (Cont'd)

(8) Non-Owner Occupied Properties (Cont'd)

In any such instance of replacement, the Company, and any person associated with the Company, including but not limited to employees, agents, board members and executives, are released and held harmless from any and all claims, causes of action, damages or losses, of any nature, whatsoever with respect to the work performed by the Company or its contractors, and shall not be otherwise liable for any claim asserted by any person, including the property owner, as a result of the LSLR.

If a property owner expressly, in writing, refuses to allow the replacement of the Customer-Owned LSL, the Company will not proceed with the replacement and will proceed with termination procedures as specified in section (6) above. The Company also retains discretion to refuse to replace a Customer-Owned LSL in circumstances where the Company's employees or contractors may be placed in a dangerous situation in attempting to do the replacement.

(9) Service Line Demarcation

If a shutoff valve is not located within 12 inches of the structure wall of the property, the Company may install a shutoff valve during the LSLR to serve as a point of demarcation between the property's service line and the property's interior water distribution piping.

The Company shall perfect its ownership of the portion of the service line located within the then-existing right-of-way in conformance with its Tariff to ensure that the Company can obtain necessary permits during the planning phase of a LSLR Project

(10) Prohibition on Partial LSLRs and Notice Requirements

Neither a Customer nor a property owner may install a Partial LSLR. A Partial LSLR installed after July 23, 2022, shall result in immediate termination of service until both the Company-Owned LSL and Customer-Owned LSL have been replaced. The Company will proceed with immediate termination of water service to a location being served by a partial LSLR installed after July 23, 2022, irrespective of whether Independent Legal Restrictions would otherwise delay or prohibit termination. Such termination shall be deemed consistent with Chapter 14 of the Public Utility Code. Moreover, in these instances, the Company is not required to comply with termination procedures described in other portions of its tariff or the Commission's regulations.

Where a Customer or a property owner, if the Customer is not the property owner, elects to replace the Customer-Owned LSL, the Customer or property owner shall replace the Customer-Owned LSL concurrent with the Company replacing the Company-Owned LSL, provided that the Customer or property owner, if the Customer is not the property owner, shall provide the Company at least 90 days' notice prior to replacing the Customer-Owned LSL.

(C) Indicates Change

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THE COLUMBIA WATER COMPANY Canceling Fifteenth Revised Page No. 4  
SCHEDULE OF RATES APPLICABLE TO COLUMBIA RATE DISTRICT

28. Lead Service Line (LSLR) Program (Cont'd)

(10) Prohibition on Partial LSLRs and Notice Requirements (Cont'd)

The Company shall not connect an Applicant for water service to the Company-Owned service line at a property where a Customer or property owner, if the Customer is not the property owner, previously refused or failed to accept the Company's offer of a LSLR until the Applicant verifies the replacement of the Customer-Owned LSL by providing a paid invoice from a licensed contractor or a verified statement from a licensed contractor attesting to completion of the LSLR.

(11) Reimbursement

Where a Customer or property owner, if the Customer is not the property owner, has replaced its own Customer-Owned LSL, the Customer or property owner shall submit to the Company a reimbursement form located on the Company's website by mail, e-mail, fax, or hand delivery, which contains, at a minimum, a detailed estimate and paid invoice from a licensed contractor verifying the replacement of the Customer-Owned LSL. Instead of a detailed estimate, a verified statement from the contractor attesting to completion of a LSLR may be sufficient in the Company's discretion. A paid invoice must be submitted.

Upon submission of the reimbursement form, the Company will review the information that was provided within ninety days of receiving the reimbursement form to determine eligibility for a reimbursement. If sufficient information has not been provided at the time of submitting the reimbursement form, the Company will contact the Customer or property owner to request the necessary information to determine eligibility. The Company will have an additional forty-five days from the time it receives the additional information to determine a customer's eligibility for reimbursement.

A Customer or property owner, if the Customer is not the property owner, is eligible to receive a reimbursement if the Customer or property owner is located within a LSLR Project Area and replaced the Customer-Owned LSL within one year of LSLR Project Commencement. A Customer or property owner, if the Customer is not the property owner, located within a LSLR Project Area is eligible for a reimbursement of LSLR expenses up to 125% of the average cost over the last twelve months, on a rolling basis, the Company would have incurred to perform the replacement of a similarly-sized service line, not to exceed the actual cost to the Customer or property owner.

Reimbursements will be paid directly to the Customer or property owner, if the Customer is not the property owner, through the issuance of a check. The Company will issue a check within ninety days after verifying that the Customer or property owner is eligible for reimbursement.

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Issued: \_\_\_\_\_, 202X

Effective: \_\_\_\_\_, 202X

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28. Lead Service Line (LSLR) Program (Cont'd)

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(12) Warranty

For Customer-Owned LSLs replaced directly by the Company or by a contractor at the Company's request, the Company will provide a two-year warranty for materials and workmanship of the replaced customer-owned portion of the Service Line commencing from the date the LSLR is complete. This warranty shall cover repairs conducted by the Company or a contractor at the Company's request of the replaced customer-owned portion of the Service Line up to \$2,500 per customer, including restoration of surfaces consistent with this Tariff, so long as the customer allows access to the property for repairs.

Only material defects and incomplete installation methods are covered by the warranty. The warranty does not cover, among other things, damage caused by natural disasters, acts of God, fires, terrorism, excavation activities, acts of sabotage, or deliberate damage. The Company shall have no liability for any damages not covered by the warranty.

(13) Limitation of Liability

The Company's liability relating to Lead Service Line Replacement efforts is limited as set forth in Rule 15 of this Tariff.

(14) Restoration

The Company will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations in the private home. No other restoration will be conducted for Lead Service Line Replacements. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways. All restoration costs shall be borne by the Customer or property owner, if the Customer is not the property owner.

(15) Ownership and Responsibility for Replacement Line

After a Customer-Owned LSL is replaced by the Company, the Customer shall continue to own the customer portion of the Service Line and shall have full responsibility for the repair, replacement and maintenance of the new customer portion of the Service Line.

(C) Indicates Change

# **Revised LSLR Plan**

# COLUMBIA WATER COMPANY LEAD SERVICE LINE REPLACEMENT PLAN

## Definitions

Refer to the tariff for definitions.

## 1.0 – SERVICE LINE INVENTORY

Columbia Water Company (“CWC”) has prepared its Service Line Inventory. It complies with the current United States Environmental Protection Agency (“USEPA”) and Pennsylvania Department of Environmental Protection (“PADEP”) guidelines. The Service Line Inventory will be updated at a minimum annually, or as additional information becomes available. If CWC purchases any water distribution system in the future, the Service Line Inventory will be updated to include the acquired system’s information and meet the deadlines set forth by the Public Utility Commission (“PUC”).

The Service Line Inventory will comply with the timing and direction of the USEPA regulations as enforced by the PADEP, inclusive of future changes to those regulations as may be amended from time to time. The Service Line Inventory for CWC identifies material types on both the company owned and customer owned sides of the service lines. It can be sorted by material type. All discovered lead components have been detailed.

CWC plans to identify, at a minimum, a cumulative average of 10.0% of the initial unknown service materials annually by means of utilizing existing records, modeling, statistical analysis, and mechanical excavation. There are no assumed service line materials in the Service Line Inventory.

See appendix L for the Service Line Inventory Legend and Instructions.

### Incorporating the Inventory into the GIS System

CWC is in the process of incorporating the Service Line Inventory into its GIS system. Once the Service Line Inventory is on the GIS, the Service Line Inventory can be updated in real time.

## 2.0 – PLANNING AND REPLACEMENTS

### Annual Projections

CWC estimates it can replace up to approximately 50 lead service lines per year, including 25 Company-owned lead service lines and 25 Customer-owned lead service lines. This projection was determined by estimating the total number of lead service lines to be less than 400. After all existing records have been inventoried, CWC will review this annual projection and adjust it as

necessary. The annual cap for customer-owned lead service line replacements (“LSLR”) is 25 customer-owned lead service lines or \$125,000, whichever is less.

### Replacing Lead Service Lines in Conjunction with Old Main Replacements

These replacements will be planned. Record-reviews of old age mains within the oldest parts of the distribution system will be analyzed to determine which water mains in the distribution system should be replaced. Prior to choosing a target area, our distribution crew will review records and/or physically inspect a portion of the service lines within a proposed area to gauge the likelihood of lead within that area. Coordination with municipalities will take place to minimize costs and minimize impacts on roads and neighborhoods.

Once the LSLR Project Areas are determined, the projects will be posted on the CWC website at least 6 months in advance of the work being done. Prior to the work being initiated, CWC staff will contact customers within an LSLR Project Area at least ~~two~~ four times over the six-month period once an LSLR Project Area has been identified, or until the customer responds to the Company, whichever is sooner, to determine whether there are customer-owned lead service lines and to verify the presence of the customer-owned lead service lines. Customers will initially receive a phone call to set up an appointment for an interior inspection of the service line. Door hangers and/or a mailed letter explaining the health effects of lead and documentation explaining the service line program will be used if the customer cannot be contacted via telephone.

### Replacing Lead Service Lines Discovered by Mechanical Excavation

Areas with a higher likelihood of having lead service lines will be prioritized for these projects. CWC will physically excavate the service lines to determine material types. If a service line is determined to be lead, coordination will occur with the customer(s) and the property owner to have the service line replaced.

### Replacing Customer-Owned Lead Service Lines Discovered Inside the Building

CWC will reach out to the customers with lead or unknown service lines. These customers will receive documentation describing the health effects related to lead. See appendix A for this information. They will be provided with information explaining how to determine their own service line material and what to do if they believe their service line material is lead; See appendix B for related documentation. CWC staff will be checking and documenting service line material in conjunction with meter changes. Customers who discover a lead service line may call and schedule to have their service line replaced. CWC will schedule to replace customer-owned lead service lines in accordance with the tariff. If the company side is lead, it will be replaced at the same time with the customer side. These replacements will occur as discovered.

### Emergency Replacements

If a lead service line is leaking or otherwise defective at the time it is discovered, CWC will replace the lead service line in accordance with the tariff. The distribution staff will maintain the proper equipment and tools necessary for emergency service line replacements. If a lead service line is

discovered during an emergency but isn't leaking, the replacement of the line will be scheduled for replacement at a later date.

### Prioritization of Lead Service Line Replacements

Determination of LSLR projects will be prioritized based on targeted sensitive populations as defined by the USEPA and PADEP, which includes areas with elevated levels of lead in tap water, areas with high concentrations of lead service lines, and/or areas of the distribution system which have elevated corrosion rates. These areas are more specifically found on houses built prior to 1950 with water mains older than 1970 within Columbia Borough or Marietta Borough.

A list of sensitive populations has also been developed to determine the service line materials. The list includes schools, nursing homes, large apartment buildings, churches, and industries. These service lines have been or will be detailed as sensitive populations in the Service Line Inventory. Homes with multiple meters and multiple family residents will also be prioritized to determine service line material.

### Disposal of Lead

Lead removed from any project will be disposed of at an appropriate facility to ensure proper disposal of all lead. Scrap receipts will be kept on file. The proceeds from the recycling efforts will be added to our operating revenue. The customer will not have any right to the proceeds of a recycled lead service line.

### Coordination with the Property Owner and Customer(s)

When a lead service line is discovered at a property, CWC will contact the customer(s) and property owner to let them know of the discovery. Customers will be given information explaining the health effects of lead and what they should do to prevent lead in their water. See appendix A for the documentation.

CWC staff will then let the customer(s) and property owner know how to schedule to have their service line replaced and when the scheduled replacement is to occur.

Prior to replacing the property-owner's portion of a lead service line, an agreement between CWC and the property-owner, or representative of the property-owner, must be signed ("Property Owner Agreement"). See appendix C. These forms will be kept on file.

When the customer-owned LSL crosses one (or more than one) property to access another, the Company will attempt to obtain approval from all property owners to allow the work necessary to replace the Customer-Owned LSL and evaluate solutions available to install conforming service lines. If the Company is unable to obtain the neighboring property owner or owners' consent, and there is no other viable and economic solution (to be determined in the Company's sole discretion) such as installing conforming service lines, the Company will commence procedures to terminate service to the neighboring property owner or owners' property as set forth in the following section of this LSLR Plan.

## Refusal of Lead Service Line Replacement

If a customer or property owner refuses to grant permission to CWC to replace the lead service line or refuses to have it replaced, Columbia Water will (1) provide the customer and property owner, if the customer is not the property owner, with a complete disclosure of the known health hazards from the continued use of a LSL, see Appendix A of the LSLR Plan, (2) inform the customer or property owner, if the customer is not the property owner, that refusal or failure to accept will require replacement of the customer-owned LSL, at the customer or property owner's expense, within 1 year from LSLR project commencement for the customer or property owner, if the customer is not the property owner, to be eligible for reimbursement; and (3) communicate to the customer and property owner, if the customer is not the property owner, that failure to allow Columbia Water to complete the LSLR or to replace the customer-owned LSL concurrent with the replacing the Company-owned LSL will lead to termination of water service under the provisions of Columbia Water's tariff.

If the customer or property owner, if the customer is not the property owner, still refuses replacement of the customer-owned LSL, the Company will require the customer or property owner, if the customer is not the property owner, to sign a form documenting their refusal. See Appendix N of the LSLR Plan. If the customer or property owner refuses or fails to sign the refusal form, the Company will make a record of and document the customer's refusal.

The Company will then schedule to replace its portion of the Company-owned LSL and notify the customer in writing of the partial LSLR no later than ten days prior to the scheduled replacement and terminate water service at that location the day prior to replacing the Company-owned LSL. Columbia Water will not connect an Applicant to water service where a property owner previously refused or failed to accept the utility's offer of a LSLR until the Applicant verifies that the replacement of a customer-owned LSL by providing a paid invoice from a licensed contractor or notarized statement from a licensed contractor attesting to completion of the LSLR.

The Company will offer a new customer applying for water service in a household that previously refused a LSLR replacement the option to have CWC replace the customer portion of the LSL to reestablish service. Prior to offering the applicant an LSLR, the Company will verify that the applicant owns or will own the property for which service is requested.

## Non-Owner Occupied Premises

The Company may stand in the shoes of the property owner and is authorized to replace a Customer-Owned LSL when (1) the Company has offered to replace at no direct cost to the property owner a Customer-Owned LSL, (2) the property is not occupied by the legal owner of the property, and (3) the Company has made attempts to obtain authorization for the Customer LSLR pursuant to this Tariff and the LSLR Plan and (a) the legal owner cannot be identified, (b) the legal owner cannot be located, or (c) the Company has notified the legal owner but the owner has never responded.

In such instances, and when, in the sole discretion of the Company, replacing the customer-owned LSL and preventing the termination of water service would be reasonable and in the public interest,

the Company may proceed to make the replacement without obtaining authorization from the property owner. In any such instance of replacement, the Company, and any person associated with the Company, including but not limited to employees, agents, board members and executives, are released and held harmless from any and all claims, causes of action, damages or losses, of any nature, whatsoever with respect to the work performed by the Company or its contractors, and shall not be otherwise liable for any claim asserted by any person, including the property owner, as a result of the LSLR except to the extent otherwise authorized by the Company's Tariff.

If, prior to completing the LSLR, a property owner expressly, in writing, refuses to allow the replacement of the customer-owned LSL, the Company will not proceed with the replacement and will proceed with termination procedures as specified in the above section of the LSLR Plan. The Company also retains discretion to refuse to replace a customer-owned LSL in circumstances where the Company's employees or contractors may be placed in a dangerous situation in attempting to do the replacement.

### Warranty

Upon completion of an LSLR by the Company or a contractor at the Company's request, a Completion-Agreement Form must be signed by the CWC and the property-owner, or representative of the property-owner. See appendix D. From the date of the Completion Agreement Form, the Company will provide a two-year warranty for materials and workmanship of the replaced customer-owned portion of the Service Line. This warranty shall cover repairs conducted by the Company or a contractor at the Company's request of the replaced customer-owned portion of the Service Line up to \$2,500 per customer, including restoration of surfaces consistent with this LSLR Plan, so long as the customer allows access to the property for repairs. Only material defects and incomplete installation methods are covered by the warranty. The warranty does not cover, among other things, damage caused by natural disasters, acts of God, fires, terrorism, excavation activities, acts of sabotage, or deliberate damage. The Company shall have no liability for any damages not covered by the warranty.

### LSLR Routine Procedure and Restoration

Columbia Water intends to replace LSLs using existing routes through a combination of pipe splitting and/or pipe pulling. This approach removes or displaces existing pipe while simultaneously replacing it with a new pipe and is the preferred method under normal circumstances. Columbia Water may also utilize guided boring to install new pipe along a different route or using open trench excavation to remove replace the pipe. The appropriate replacement technique will depend on a combination of many site-specific characteristics, including, but not limited to, time constraints, soil characteristics, depth to ground water or rock, depth of road foundation, condition of the service line, proximity of other utility services (e.g., electric, gas, cable, sewer, storm water), site conditions (e.g., access, parking, paving, landscaping, overhead obstructions), pipe conditions (e.g., length of pipe, pipe diameter and wall thickness, bury depth, configuration, and repair history, and conditions inside the home like a finished basement with limited access to the water meter and plumbing. All new pipe installation will be copper or plastic.

See also appendix E for the LSLR Routine Procedures. These procedures will be publicly available at the main office and on the CWC website. CWC will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations in the private home. No other restoration will be conducted for Lead Service Line Replacements. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways. All restoration costs shall be borne by the Customer or property owner, if the Customer is not the property owner.

### Risk Mitigation Measures

All customers and property owners with an LSLR will receive documentation prior to work being initiated explaining the health effects of lead and information on flushing their interior plumbing. See appendix F for this documentation. The Company will provide customer(s) affected by an LSLR with a pitcher filter, six months of replacement cartridges, and use instructions approximately thirty days prior to the scheduled LSLR, but no later than the day of the LSLR. The affected customer(s) will be provided a pitcher filter hand delivered by the Company. If there isn't a customer home at the time of delivery, the Company will use a door hanger indicating how a pitcher can be obtained. A follow-up phone call will also be made to the customer to determine whether they received the door hanger and that they should either pick their pitcher filter up at our main office of 220 Locust St, Columbia PA 17512, or schedule to have someone deliver the pitcher prior to the LSLR. See appendix G for this document. If the affected service line serves more than one residence, such as a multi-unit building or a non-residential unit, CWC will provide the documentation and pitcher-filter to every unit in the building.

### Flushing

CWC will assist customers with the flushing of the customer's interior plumbing after an LSLR. Information on flushing is in the LSLR Information document (appendix B), which is provided to all customers that have an LSLR. A detailed description of how to flush will also be found on the CWC website. See appendix H for the link.

### Sampling

CWC will be offering to collect water samples for all customers who have an LSLR. If the customer wants their water sampled, CWC will provide the customer with sampling procedures and bottles to collect one set of follow-up first draw and 5<sup>th</sup> liter tap samples. See appendix I for the LSLR sampling procedures. The sampling will be scheduled with the customer and will be collected between three to six months after completion of the LSLR. If either of the follow up samples exceed 15 ppb of lead, CWC will provide the results of both samples to residents as soon as practicable but no later than three calendar days after becoming aware of the results. If none of the follow up samples exceed 15 ppb of lead, CWC shall provide the results of the samples to residents within 30 days after receiving the results. Accompanying information from CWC includes an explanation of the effects of lead, a list of steps consumers can take to reduce exposure to lead in drinking water, contact information for CWC, and the maximum contaminant level goal and the action level for lead, as well as the definitions for these two terms. The follow-up sample

results, and accompanying information will be delivered to the customer through one of the following methods – electronically, mail, phone, hand delivered, or another method approved by PADEP. See appendix J for the documentation to be provided to the customer. If the offer to follow-up sample is not accepted by the customer, no sample will be collected, and the decline of sampling will be documented.

### Reimbursement

No later than 30 days after LSLR Project Commencement, the Company will mail Appendix M and a letter detailing eligibility for an LSLR reimbursement and instructions on how to obtain the reimbursement to customers within the LSLR Project Area. Any handout necessary for a customer or owner to receive reimbursement shall be mailed physically and electronically mailed to customers and owners, along with the forms remaining available on the company's website, on a reasonable best-efforts basis where the Company has the customer or property owner's email address.

If an eligible customer chooses to use their own contractor to replace the customer-owned service line, CWC shall reimburse the customer for the replacement cost of the customer-owned lead service line. See appendix M for the Reimbursement Form. Customers are to use this as a guide for determining eligibility for reimbursement, and ensuring they have the correct documentation for reimbursement. For every lead service line replaced, an LSLR Cost form will be completed. See appendix K for the LSLR Cost Form. CWC will use these completed forms to establish the reimbursement amount for the customers who choose to use their own contractors. We will reimburse the customers in a manner that is consistent with our tariff and PUC guidelines.

### Financial Considerations and Funding

CWC's annual budget will include costs relating to LSLR. Budget considerations include the cost for any outreach costs, funds for customer sampling following LSLR, costs of pitchers and replacements, additional staffing, the costs of the materials, and any additional costs that may be incurred.

The cost incurred by CWC for LSLRs will be funded with a combination of commercial loans, cash from operations, and/or PennVEST loans.

### Annual Reporting

When an LSLR is completed, the service address, the length of the lead removed, the pipe diameter, and the actual cost will be documented. See appendix K for this document. This information will be compiled annually for the LSLR Program Report.

### Website Information, Links, and Documentation

CWC will add lead service line documentation to its website within 1 year of PUC approval. A tab will be created on the website's main page, which will link a user to a specific page about lead service lines. Appendix's A, B, F, H, and M will be made available on the website through links.

These documents provide information about LSLR routine procedures, flushing, determining service line material, and the health effects associated with lead.

The website will include information about upcoming LSLR projects. Projected main replacement projects will be posted on the LSLR webpage and provide customers with specific information of when LSLR projects will occur.

A secure, online interactive map will be provided for customers to have the ability to determine if a lead service line may exist at their location. A method will be provided to allow a customer to request assistance in determining if their service line is a lead service line.

The web page will include information regarding the reimbursement requirements and instructions for customers to determine their ability for reimbursement of a previous LSLR. CWC will explore options for providing an online tool for customers to determine their eligibility for reimbursement.

The Company's LSLR website and all documentation regarding LSLRs will be available in both English and Spanish and, upon request, the Company will provide any/all documentation regarding LSLRs in other languages to customers directly. The Company will also make its translation services available to customers who call the Company's customer service and request translation of the written information into other languages.

Any community outreach programs or coordination efforts will be posted on the website.

## List of Appendices:

- A. Brochure Lead Information
- B. How to Check Your Service Line Material
- C. LSLR Property Agreement Form
- D. LSLR Completion Form
- E. LSLR Routine Procedure
- F. LSLR Information
- G. LSLR Pitcher Filter Card
- H. Flushing After your LSLR
- I. LSLR Sampling Procedures
- J. LSLR Sample Results Form
- K. LSLR Cost
- L. Service Line Inventory Legend and Instructions
- M. Reimbursement Form
- N. Refusal Form

## **Appendix A**

## **Appendix B**

## **Appendix C**

## **Appendix D**

## **Appendix E**

## **Appendix F**

## **Appendix G**

## **Appendix H**

## **Appendix I**

## **Appendix J**

## **Appendix K**

## **Appendix L**

## **Appendix M**

## **Appendix N**

# **Revised Modified LTIIP**

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# **COLUMBIA WATER COMPANY**

## **MODIFIED LONG-TERM INFRASTRUCTURE IMPROVEMENT PLAN**

**2023-2027**



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## Introduction

In accordance with the requirements of 66 Pa. C.S. §§ 1350 - 1360 and the Public Utility Commission's Final Order for the Implementation of Act 11 of 2012 (Public Meeting of August 2, 2012, Docket No. M-2012-2293611), Columbia Water Company's (CWC) Long-Term Infrastructure Improvement Plan (LTIIP) addresses infrastructure investment through its long-established and cost-effective Distribution System Improvement Charge (DSIC)<sup>1,2</sup>.

Since its establishment of a DSIC in April of 2003, CWC has replaced over 27,400 feet of pipe. This represents about 3.8% of its distribution system pipe that has been renewed through the DSIC program. In addition to pipe, CWC has replaced 940 service lines which is approximately 9% of the total service lines and 5,330 old age meters which is over 51% of the Company's meters. This has allowed CWC to continue to provide safe and reliable service to its customers. In addition, the DSIC has allowed the Company to manage infrastructure replacement costs in an effective manner by directly targeting those costs without the need for additional rate case filings, the reasonable costs of which are borne by the ratepayers.

Prior to Commission approval of the Company's last rate filing on March 1, 2018 at Docket No. R-2017-2598203, the Company operated two districts known as the Columbia District and the Marietta District. For purposes of the DSIC, the March 1, 2018 Commission Order combined the rate districts and made the Marietta Rate District DSIC eligible. Prior to the March 1, 2018 Commission Order, only the Columbia Rate District was DSIC eligible. This LTIIP is for CWC's distribution system that is located in the Columbia and Marietta rate districts. On March 31, 2022, the Company acquired East Donegal Township Municipal Authority ("East Donegal").<sup>3</sup> The Company operates the East Donegal Rate District as a separate, independent system. Except to the extent necessary to carry out its Lead Service Line Replacement (LSLR) Plan (LSLR Plan), as discussed below, the Company's LTIIP does not include the distribution system located in the East Donegal Rate District.

In accordance with the requirements of 66 Pa. C.S. § 1311 and the Public Utility Commission's Final Rulemaking Order for the Implementation of Act 120 of 2018 (Public Meeting of February 24, 2022, Docket No. L-2020-3019521), CWC is now submitting this modification to its LTIIP to incorporate CWC's LSLR Plan into its LTIIP. CWC's LSLR Plan addresses the Company's efforts to replace Company-owned and Customer-owned service lines made of lead materials as approved at Docket No. P-2023-3041845. The modified-LTIIP only applies to the East Donegal Rate District to the extent necessary to implement its LSLR Plan.<sup>4</sup>

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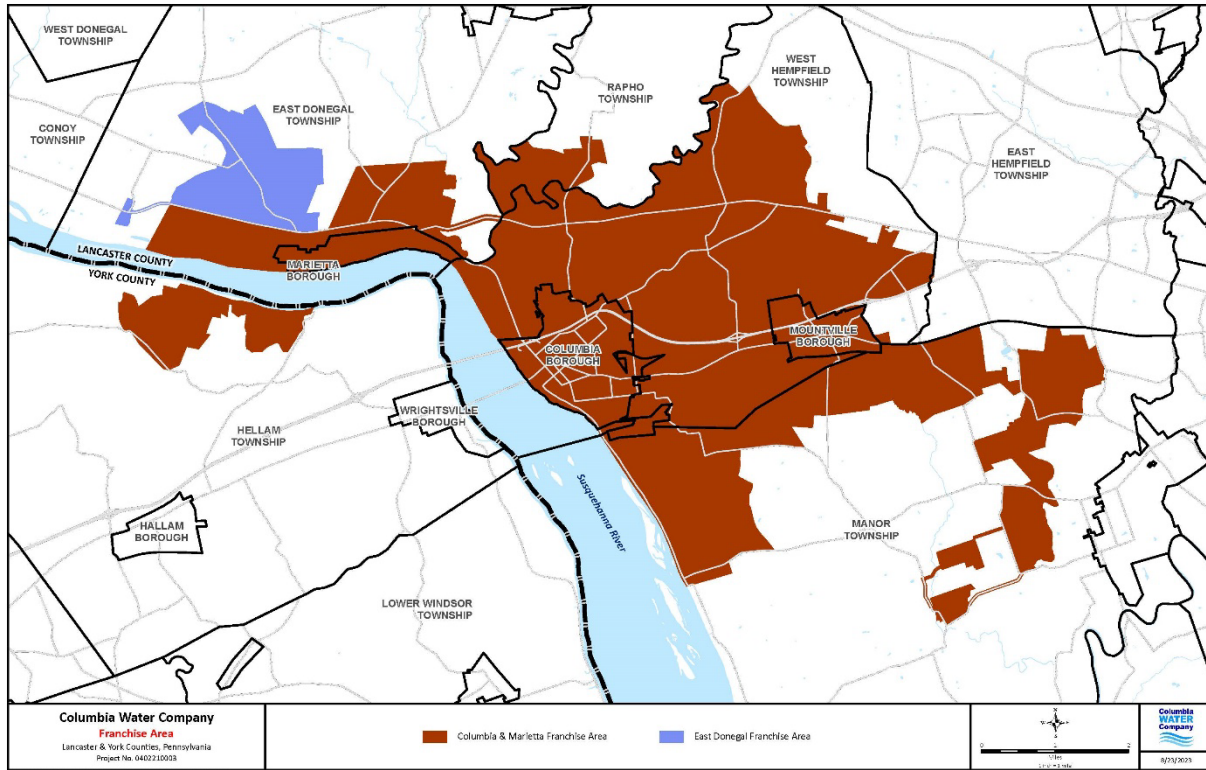
<sup>1</sup> The Pennsylvania Public Utility Commission authorized CWC to establish a DSIC through Final Order dated April 17, 2003 at Docket No. P-00021979.

<sup>2</sup> The Pennsylvania Public Utility Commission authorized CWC to include the Marietta Rate District into its DSIC program through Final Order dated March 1, 2018 at Docket No. R-2017-2598203.

<sup>3</sup> The Pennsylvania Public Utility Commission authorized CWC to acquire the East Donegal Township Municipal Authority through Order dated February 3, 2022 at Docket No. A-2021-3027134, *et al.*

<sup>4</sup> The East Donegal rate district does not have a DSIC. As a result, the Company does not include East Donegal capital improvements in its DSIC. Similarly, LSLR costs that are attributable to the East Donegal system will not be recovered through the DSIC. The Company, however, reserves the right to request Commission approval to apply

CWC provides public water service to residential, commercial, public and industrial customers in Columbia, Marietta and Mountville Boroughs, West Hempfield, Manor, and East Donegal Townships, Lancaster County and Hellam Township, York County, Pennsylvania. CWC served approximately 12,230~~154~~ customers at the end of year ~~November~~ 2024~~2~~. Figure 1 shows the CWC service area covered by this LTIP.



**Figure 1 – Columbia Water Company Service Area**

The CWC distribution system is comprised of water mains that vary in size from 4-inch through 36-inch with the material type being mainly cast iron and ductile iron. The age of the water mains range from the 1870s through 2023. The condition of the pipes vary throughout the system and age is not always the best indicator of pipe condition. Other factors like the original quality of the pipe, installation and geology impact the pipe condition and reliability.

This LTIP identifies how CWC will use the DSIC to replace aging infrastructure at an accelerated pace. This LTIP will identify the types and ages of infrastructure eligible for DSIC recovery; schedule for the planned replacements; location of the eligible property; estimates of the quantity to be replaced; projected annual expenditures; manner in which the replacement will be accelerated; workforce management plan to ensure work is completed safely and cost effectively; and description of outreach to other utilities to minimize disruption to customers; as well as the benefit to customers of accelerated infrastructure rehabilitation and replacement.

the DSIC to the East Donegal Rate District and recover these LSLR costs and all other DSIC-eligible costs attributable to the East Donegal Rate District through the DSIC.

This LTIP will also incorporate the Company's LSLR Plan into its LTIP. In October 2018, Governor Wolf signed into law Act 120 of 2018 (Act 120), which became effective on December 23, 2018. Act 120 amended Section 1311(b) of the Public Utility Code in order to, *inter alia*, authorize water utilities to pursue comprehensive replacement of lead service lines (LSLs) that remain in service across Pennsylvania subject to Commission approval. The Commission promulgated its LSLR Regulations requiring a Class A water public utility to remove and replace all LSLs, whether entity-owned or customer-owned, within or connected to its water distribution systems within 25 years from the effective date of the Commission's regulations. Moreover, 52 Pa. Code § 65.54(b) requires that the utility shall include with its LSLR Program a modified LTIP containing a LSLR plan as a separate and distinct component of the entity's LTIP. Accordingly, Columbia Water has begun efforts to replace LSLs in its system, including galvanized materials downstream of a LSL, as well as any lead pigtail, gooseneck, or other fitting that is connected to a LSL. This LTIP will identify how CWC will incorporate its LSLR Plan into its LTIP to continue replacing aging infrastructure in combination with the replacement of LSLs.

## Section 1 – Types and Age of Eligible Property

A listing of all eligible property, as defined in 66 Pa. C.S. §1351(3), is provided in this section. CWC developed and integrated a Geographic Information Systems (GIS) to map and manage its water system assets. The water system assets such as water mains, valves, hydrants, tanks, and service lines are spatially located and attributed with information about the distribution system. This information is supplemented with paper mapping and files as necessary. This process provides the means for CWC to document data and provides the Company with an efficient means to identify DSIC eligible facilities for replacement. These efficiencies translate into direct savings to the customers by specifically targeting the appropriate facilities to be replaced.

CWC has also developed a LSL inventory to locate, track, and replace Company-owned and Customer-owned service lines that contain lead, galvanized steel downstream of a LSL, and lead pigtails, goosenecks, or other fittings connected to LSLs. Columbia Water has incorporated the LSL inventory into its GIS to map and manage these assets. This information is supplemented with paper mapping and files as necessary.

CWC owns the following water system components:

*Water mains* – In a water distribution system the water mains form the network necessary to distribute water to the customers. Larger water mains are used to move large volumes of water to pressure zones and key demand areas. Smaller mains fill in the network and are normally located beneath the streets and roads in the front of homes, businesses, schools and factories. Water gets delivered from the water main to the customer through a service line. CWC owns approximately 722,890 Linear Feet (LF) of water mains, not including the East Donegal Rate District. The material type of the water main generally depends on the installation date and the installing party. Newer mains are normally ductile iron cement lined (DICL) pipe with the older mains being mainly unlined cast iron pipe. Very limited pockets of polyvinyl chloride (PVC) exist within the system.

*Company-Owned Service lines* - Water gets delivered from the water main to the customer's curb stop through a Company-owned, pressurized service line. CWC owns the service line between the water main and the curb stop (Company-owned service line). The Company-owned service lines vary in size from 6-inch down to ¾-inch with a majority of CWC's service lines being constructed of copper. A small portion of Company-owned service lines may be made of lead. Only copper is used when Company-owned service lines are replaced. The Company owns approximately 10,657,407 service lines for its Columbia and Marietta Rate Districts and 1,582,718 service lines for its East Donegal Rate District. The Company estimates the total number of Company-owned LSLs that need to be replaced to be less than 4,200. CWC plans to identify, at a minimum, a cumulative average of 10.0% of the initial unknown service materials annually by means of utilizing existing records, modeling, statistical analysis, and mechanical excavation.

*Valves* – Valves are used to control the volume and direction of flow in the distribution system. They are also used to isolate sections of water main for replacements or repairs. Almost all valves are buried and are opened or closed through a valve box that extends from the valve to the ground surface. The valves vary in size from 4-inch through 16-inch. CWC owns approximately 3,570,335 valves in its system, not including the East Donegal Rate District.

*Hydrants* – Hydrants are typically located along roadways and rights-of-ways. Hydrants are used to flush water from the water system and to assist in fighting fires. Generally, a hydrant can be isolated from the distribution system by opening or closing a dedicated hydrant valve. Hydrants play a critical role in system maintenance and community fire protection. CWC owns approximately 999,778 hydrants in its system, not including the East Donegal Rate District.

*Meters* – Meters are used to measure the amount of water used by a customer. Meters are sized based upon the amount of water a customer uses. Typically residential customers have a 5/8-inch or 3/4-inch meter. Commercial customers have meters that range from 3/4-inch through 2-inch meters. Industrial customers normally have meters in the 2-inch through 6-inch range. CWC owns approximately 10,407 meters in its system, not including the East Donegal Rate District.

Customers own the following water system components:

*Customer-Owned Service Lines* - the portion of the service line extending from the Curb Stop to the meter or one foot inside a building foundation, whichever is farther (Customer-owned service line). The Customer-owned service line is owned by the customer. Generally, any replacement of the Customer-owned service line is the responsibility of the customer and not included in this LTIP. However, Customer-owned service lines are included in this LTIP only for purposes of the LSLR Plan and the replacement of Customer-owned service lines made of lead materials. The Customer-owned service lines vary in size from 6-inch down to ¾-inch with a majority of Customer-owned service lines being constructed of copper. A small portion of Customer-owned service lines may be made of lead. Copper or plastic is used when Customer-owned service lines are replaced

pursuant to the LSLR Plan. The Company has identified approximately 12,115 Customer-owned service lines across all three rate districts. The Company estimates the total number of Customer-owned LSLs that need to be replaced to be less than 400. CWC plans to identify, at a minimum, a cumulative average of 10.0% of the initial unknown service materials annually by means of utilizing existing records, modeling, statistical analysis, and mechanical excavation.

Table 1 provides a breakdown of eligible property by type, not including the property eligible for replacement under the LSLR Plan. Table 2 provides a breakdown of the water main by size. Table 3 provides a breakdown of eligible property for the LSLR Plan. Table 5 provides a breakdown of the company side and customer side service line materials eligible under the LSLR Plan by material.

**Table 1 – Types and Age of Eligible Property**

<b>Property Type</b>	<b>Quantity***</b>	<b>Age (Year)</b>
Water mains **	722,890 LF	1875 - 2023
Company-owned service lines	10,657407 EA	1875 - 2023
Valves	3,57035 EA	1875 - 2023
Hydrants	99978 EA	1875 - 2023
Meters	10,657407 EA	1990 - 2023

\*\* - less than 2% of all water mains were installed prior to 1900.

\*\*\* - does not include the East Donegal Rate District.

**Table 2 – Quantity of Water Mains by Size**

<b>Water Main Diameter (inches)</b>	<b>Quantity (Linear Feet)**</b>
4	7,550
6	143,650
8	311,050
10	52,200
12	195,000
16	13,100
36	340
<b>TOTAL</b>	<b>722,890</b>

\*\* - does not include the East Donegal Rate District.

**Table 3 – Types and Age of Eligible Property Under the LSLR Plan**

<b>Property Type</b>	<b>Quantity**</b>	<b>Age (Year)</b>
Company-owned service lines	12,051 EA	1875 – 2023
Customer-owned service lines	12,050 EA	1875 - 2023

\*\* - only eligible to the extent the service lines are made of lead materials.

**Table 4 – Company-Side and Customer-Side Service Lines Eligible Under the LSLR Plan by Material**

<b>Company Side Material</b>		<b>Customer Side Material</b>	
Lead	4	Lead	1
Copper	4,297	Copper	2,135
Unlikely Lead	4,560	Unlikely Lead	5,103
Unknown	3,173	Unknown	4,807
Likely Lead	1	Likely Lead	1
Other	16	Other	3
<b>TOTAL</b>	<b>12,051</b>	<b>TOTAL</b>	<b>12,050</b>

## Section 2 – Schedule for Planned Replacement of Eligible Property

CWC understands the importance and benefits of continuous renewal of aging infrastructure to continue to provide safe and reliable service to our customers. This section provides an overview of the planning process for replacing aging water distribution system infrastructure and Company-owned and Customer-owned LSLs. This section does not discuss the planning process for new water main extensions or for improvements to treatment, storage and pumping facilities since they are not DSIC eligible.

Many components must be evaluated and weighted when determining which infrastructure to replace in a given year. In general the following components, in order of priority, are used to select infrastructure to replace each year:

- Planned state highway improvements;
- Planned municipal street improvements;
- Planned large scale improvements by other utilities;
- Water main break frequency;
- Age;
- Material quality; and
- Installation quality.

The first three items are given the highest priority since CWC has little to no influence on the scheduling of work by outside entities. CWC understands the significant benefit to the customers and municipalities when infrastructure is replaced and/or improved concurrently with other public infrastructure work. CWC meets at least annually with the municipalities in which it serves public water to coordinate the replacement of water system infrastructure with planned street upgrades. This directly reduces the cost to the Company and thus, to customers, by providing for less construction work and expense to replace these lines.

With respect to material quality, the Company will prioritize the replacement of services lines made of lead materials. These projects will be prioritized based on targeted sensitive populations as defined by the Environmental Protection Agency (EPA) and the Pennsylvania Department of Environmental Protection (PADEP), which includes areas with elevated levels of lead in tap water, areas with high concentrations of lead service lines, and/or areas of the distribution system which have elevated corrosion rates. A list of sensitive populations has also been developed to determine the service line materials. The list includes schools, nursing homes, large apartment buildings, churches, and industries. These service lines have been or will be detailed as sensitive populations in the Service Line Inventory. Homes with multiple meters and multiple family residents will also be prioritized to determine service line material.

Lead materials will be identified through four methods: (1) in combination with main replacements, (2) through mechanical excavation, (3) through customer self-surveys, and (4) emergency repairs, as set forth below:

*In Combination with Main Replacements* - As part of its broader LTIP efforts, Columbia Water will analyze record-reviews of old age mains within the oldest parts of the distribution system to determine which water mains in the distribution system should be replaced. Prior to choosing a LSLR Project Area, the Company's distribution crew will review records and/or physically inspect a portion of the service lines within a proposed area to gauge the likelihood of lead within that area. Coordination with municipalities will take place to minimize costs and minimize impacts on roads and neighborhoods. Once the LSLR Project Areas are determined, the projects will be posted on the Columbia Water website at least six (6) months in advance of the work being done. Prior to the work being initiated, Columbia Water staff will reach out to the customers to determine all service line materials within the affected area, and to provide the customers with detailed information regarding the routine procedures and the potential health risks involved.

*Mechanical Excavation* - Areas with a higher likelihood of having lead service lines will be prioritized for these projects. Columbia Water will physically excavate the service lines to determine material types. If a service line is determined to be lead, coordination will occur with the customer(s) and the property owner to have the service line replaced.

*Customer Self-Surveys* - Columbia Water will reach out to the customers with lead, galvanized requiring replacement, or unknown service lines. Customers who discover a lead service line may call and schedule to have their service line replaced. CWC will schedule to replace customer-owned lead service lines. If the company side is lead, it will be replaced at the same time with the customer side. These replacements will occur as discovered.

*Emergency Repair* - If a lead service line is leaking or otherwise defective at the time it is discovered, CWC will replace the lead service line in accordance with its tariff. Columbia Water staff will maintain the proper equipment and tools necessary for emergency service line replacements. If a lead service line is discovered during an emergency but is not leaking, the replacement of the line will be scheduled for replacement at a later date.

The Company plans to undertake repair and replacement of its system components in the following manner:

*Water main replacement* – Work normally entails full replacement of the water main (as opposed to rehabilitate) since this option eliminates long-term structural and integrity deficiencies that remain when a water main is simply rehabilitated. Further, this option is also considerably less disruptive to the customer since the new main can be installed, tested and placed into service before moving service lines from the old main to the new main. Disruption of water service is minimal since the customer is without service during their service line switch over only. In areas where considerable construction or restoration costs would be incurred to replace a water main, rehabilitation of the existing main is pursued.

*Valve and hydrant replacement* – Work normally involves the full replacement of the valve and hydrant. Occasionally a relatively new valve or hydrant will be rebuilt and/or reused but only in those situations where the reliability and integrity are well known. Valves and hydrants normally get replaced at the same time a water main is being replaced or rehabilitated. There are times when critical valves and hydrants are replaced independently of a full scale water replacement project. Properly operating valves greatly benefit the customers since it minimizes the geographic area impacted by a main repair and minimizes the amount of time needed to make a repair. A schedule of valve and hydrant replacements is provided in Table 5.

*Company-Owned Service line replacement* – Work normally involves the full replacement of the company-owned service line between the water main and the curb stop. The work will include replacement of the curb stop and curb box. Company-owned service lines get replaced during full scale water replacement projects or if the Company determines they otherwise need to be replaced due to conditions including but not limited to leaks or malfunction.

*Meter replacement or repair*– Residential and commercial meters normally involve full replacement. Some commercial and industrial meters can be rehabilitated. Meter replacement is typically based upon meter age. CWC replaces its meters in compliance with the schedule in the Commission’s regulation at 52 Pa. Code § 65.8. Accelerated replacement of meters will benefit customers directly through more accurate meter readings.

*Lead service line replacement* – Work involves replacing Company-owned and Customer-owned LSLs using existing routes through a combination of pipe splitting and/or pipe pulling. This approach removes or displaces existing pipe while simultaneously replacing it with a new pipe and is the preferred method under normal circumstances. Columbia Water may also utilize guided boring to install new pipe along a different route or using open trench excavation to remove replace the pipe. The appropriate replacement technique will depend on a combination of many site-specific characteristics, including, but not limited to, time constraints, soil characteristics, depth to ground water or rock, depth of road foundation, condition of the service line, proximity of other utility services (e.g., electric, gas, cable, sewer, storm water), site conditions (e.g., access, parking, paving, landscaping, overhead obstructions), pipe conditions (e.g., length of pipe, pipe diameter and wall thickness, bury depth, configuration, and repair history, and conditions inside the home like a finished basement with limited access to the water meter and plumbing. All new pipe installation will be copper or plastic.

### Section 3 – Location of Eligible Property

All of the CWC’s eligible property is located in Lancaster and York Counties, Pennsylvania. More specifically, the property is located in the boroughs of Columbia, Marietta and Mountville and in portions of the townships of West Hempfield, East Donegal, Hellam and Manor. See Figure 1 for additional details.

Areas with Company-owned and Customer-owned LSLs are more specifically found on houses built prior to 1950 with water mains older than 1970 within Columbia Borough and Marietta Borough. Though lead service line materials may be found in Mountville Borough and in portions of the townships of West Hempfield, East Donegal, Hellam and Manor. See Figure 1 for additional details.

### Section 4 – Estimate of the Quantity of Eligible Property to be Replaced

Table 5 identifies eligible property that is projected to be replaced in the next five years. These quantities were prepared based upon the best available information (planned municipal and utility projects, main break data, pipe age, etc.) at the time this plan was prepared. Actual quantities may vary depending on conditions that could change in the distribution system or changes made by the municipalities to their street projects.

**Table 5 – Projected Quantities of Eligible Property to be Replaced for 2023 - 2027**

<b>Year</b>	<b>Water Main (LF)</b>	<b>Service lines (ea.)</b>	<b>Valves</b>	<b>Hydrants</b>	<b>Meters</b>
2023	1,200	30	5	3	140
2024	1,200	30	5	3	140
2025	1,200	50	5	3	140
2026	1,200	50	5	3	140
2027	1,200	50	5	3	140

Prior to 2024, the LTIP contained 30 service line replacements. The Company-owned service lines being replaced were primarily made of lead materials. The Company is now planning to undertake 50 service line replacements, which includes replacing Company-owned and Customer-owned LSLRs, on an annual basis beginning in 2025.

## Section 5 – Projected Annual Expenditures

The projected annual expenditures for the 2023 to 2027 period are listed in Table 6 below. These estimates are based upon the quantities listed in Table 5 and recent construction costs. A break down by category is provided in Table 7.

**Table 6 – Projected Annual Expenditures for 2023 - 2027**

<b>Year</b>	<b>Projected Annual Expenditures</b>
2023	\$280,000
2024	\$280,000
2025	\$380,000
2026	\$380,000
2027	\$380,000

**Table 7 – Projected Annual Expenditures by Category for 2023 - 2027**

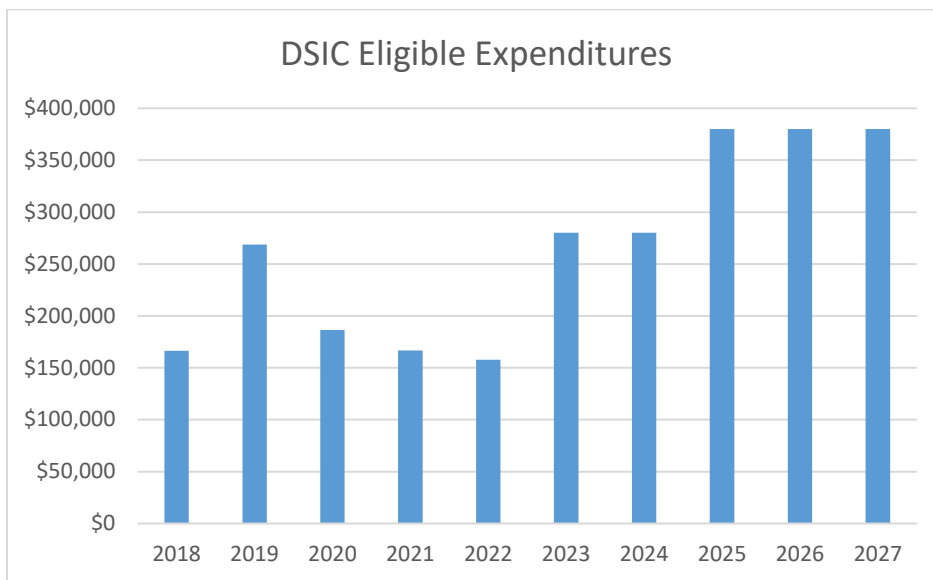
<b>Year</b>	<b>Water Main</b>	<b>Service Lines</b>	<b>Valves</b>	<b>Hydrants</b>	<b>Meters</b>	<b>Total</b>
2023	\$160,000	\$45,000	\$15,000	\$10,000	\$50,000	\$280,000
2024	\$160,000	\$45,000	\$15,000	\$10,000	\$50,000	\$280,000
2025	\$160,000	\$145,000	\$15,000	\$10,000	\$50,000	\$380,000
2026	\$160,000	\$145,000	\$15,000	\$10,000	\$50,000	\$380,000
2027	\$160,000	\$145,000	\$15,000	\$10,000	\$50,000	\$380,000

Prior to 2024, the Company was already investing \$45,000 into replacing primarily Company-owned service lines made of lead. The Company is committing to an additional \$100,000 for a total of \$145,000 for Company-owned and Customer-owned LSLRs beginning in 2025. For all projects, the most prudent, cost-effective methods will be used to complete the project. Almost all eligible property is abandoned in place after the replacement infrastructure is installed and therefore is not salvageable. Meters can be salvaged and are sold at local salvage yards.

## Section 6 – Acceleration of Infrastructure Replacement

CWC has a track record of investing in its infrastructure to maintain safe and reliable service to all of its customers including infrastructure not eligible for DSIC. Over the past 5 years considerable investment has occurred in major upgrades of its water system including a system-wide security system, four (4) emergency generators, repainted two tanks, and installing a new intake in the Susquehanna River. In addition CWC purchased an adjacent water system that was being operated by part-time contractors.

In addition to the capital expenditures listed above, CWC, through the use of its DSIC, continued to replace water mains, Company-owned service lines, valves, hydrants and meters. Figure 2 graphs the projected and historical DSIC eligible capital expenditures. With the completion of the large projects listed above, additional capital will be directed towards expediting infrastructure replacement.



**Figure 2 – Projected and Historic DSIC Eligible Expenditures**

The projected DSIC eligible expenditures will accelerate the replacement of infrastructure by approximately 80 percent. Moreover, through the Company's LSLR Plan, the Company will make a concerted effort to replace existing LSLs in a timely manner within the time frame set forth in 52 Pa. Code § 65.53(a). The LSLR Plan will take place in conjunction with Columbia Water's other infrastructure investments.

## Section 7 – Workforce Management Plan and Training

To ensure system reliability, public safety, quality installation and cost-effectiveness, all DSIC eligible projects will be constructed by qualified personnel. CWC uses a competitive bidding process for the purchase of piping, valves and hydrants. A list of materials is prepared for the project and sent to the four (4) major pipe suppliers for price quotes. CWC utilizes its own staff and equipment for the installation of water mains, Company-owned service lines, Customer-owned service lead service lines, valves, hydrants and meters. Company employees utilized for this type of work have extensive training in the use of heavy equipment, pipe laying procedures, disinfection procedures and safety training. For water mains greater than 12-inches in diameter, stream crossings or expedited Pa DOT projects, CWC uses qualified local contractors for water main, valves and hydrant installations. These local contractors are prequalified based upon experience with similar projects, safety record, and qualifications of personnel. All project sites are inspected regularly throughout the construction process by Company personnel.

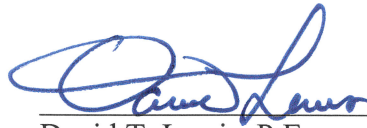
## Section 8 – Outreach and Coordination with other Utilities

CWC meets annually, and often times more frequently, with the municipalities where it provides public water service to coordinate the replacement of water main with the reconstruction and/or repaving of streets and roadways. These meetings often times include the other utilities serving the same areas. CWC coordinates its replacement projects to coincide with other planned roadway and utility work. PaDOT is very effective at notifying utilities well ahead of planned state highway projects making coordination of the work an easy process. In each of the municipalities where CWC provides public water service, public officials have a strong record of planning street projects far enough in advance to allow each of the major utilities to upgrade facilities as necessary.

For each project, CWC coordinates all work with the state or local municipality through planning meetings and the permitting process. In addition, CWC utilizes the PA One Call system to minimize utility conflicts and notifies customers of proposed work with door hangers throughout the construction process.

## VERIFICATION

I, David T. Lewis, President, on behalf of Columbia Water Company, hereby state that the facts set forth in the foregoing document 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 in this matter. This verification is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



---

David T. Lewis, P.E.  
President  
Columbia Water Company

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the parties, listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

### BY ELECTRONIC MAIL ONLY:

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Melanie El Atieh, Esquire  
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*/s/ Whitney E. Snyder*

Whitney E. Snyder

Thomas J. Sniscak

Dated this 19<sup>th</sup> day of March, 2025