



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

IN REPLY PLEASE
REFER TO OUR FILE

April 16, 2025

Docket No. A-2025-3053990

Utility Code 230073

ELIZABETH ROSE TRISCARI ESQUIRE
PENNSYLVANIA AMERICAN WATER COMPANY
852 WESLEY DRIVE
MECHANICSBURG PA 17055
ELIZABETH.TRISCARI@AMWATER.COM

RE: Application of Pennsylvania-American Water Company – Wastewater Division for Approval of the Right to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Butler Township, Butler County, Pennsylvania at Docket No. A-2025-3053990

Dear Attorney Triscari:

On March 17, 2025, Pennsylvania-American Water Company – Wastewater Division (PAWC-WD) filed the above-captioned document (Application) with the Pennsylvania Public Utility Commission (Commission). For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

Please forward the information to the Secretary of the Commission at the address listed below **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

Please note your answers must be verified per 52 Pa. Code § 1.36. Accordingly, you must provide the following statement with your responses:

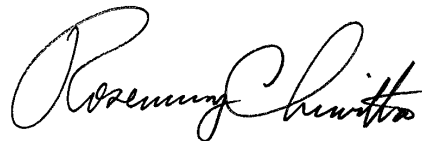
I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Signature _____
Title _____
Date _____

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the review, please send a copy of the response to James Kennedy, in the Water/Wastewater Section of the Bureau of Technical Utility Services via email at jameskenne@pa.gov. Please also direct any questions to James Kennedy at telephone number (717) 783-3971. Thank you in advance for your cooperation.

Sincerely,



Rosemary Chiavetta
Secretary

Enclosure: TUS Data Request Set 1

cc: Darryl Lawrence, Office of Consumer Advocate (w/enclosure), ra-oca@paoca.org
Melanie El Atieh, Office of Consumer Advocate (w/enclosure), Melatieh@paoca.org
NazAarah Sabree, Office of Small Business Advocate (w/enclosure), ra-sba@pa.gov
Allison Kaster, Bureau of Investigation & Enforcement (w/enclosure), akaster@pa.gov

TUS Data Request Set 1

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Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

- A-1. Please provide a statement confirming that the Application does or does not meet all the applicable requirements or mandates of any officially adopted comprehensive plans and applicable zoning designations of Butler Township and Butler County.
- A-2. Please clarify if PAWC-WD and Belmont Investment Properties, LLC (Developer) are affiliated with one another.
- A-3. Please identify any permits that will be required to construct the collection system, quantify the cost of each of these permits, and indicate which entity (e.g., PAWC-WD, Developer, etc.) will be responsible for the costs of each required permits.
- A-4. Please provide a copy of the most recent Chapter 94 Municipal Wasteload Management report filed with the Department of Environmental Protection (DEP) for PAWC-WD's Butler Township Wastewater Treatment Plant (WWTP).
- A-5. Please provide a copy of the National Pollutant Discharge Elimination System permit for PAWC-WD's Butler Township WWTP.
- A-6. In the Application's Exhibit D-1, PAWC-WD provided a copy of a letter from the Developer requesting that PAWC-WD provide wastewater service to The Oaks at Dutchtown (Development). The letter indicated that Butler County and Butler Township have given preliminary approval for both phases of the Development, and final approval of Phase 1 of the Development. PAWC-WD provided a copy of the final approval letter for Phase 1 of the Development from Butler Township as the Application's Exhibit M. Please provide a copy of the preliminary approval letters from Butler County and Butler Township for the entire Development as referenced in the Application's Exhibit D-1.
- A-7. The draft Sewer Main Extension Agreement, provided as the Application's Exhibit E, indicated that new service connections must be in accordance with PAWC-WD's Connection Management Plan (CMP). Additionally, the DEP-approved Act 537 Official Sewage Facilities Plan for the Butler Area Sewer Authority, filed with the Commission at Docket No. A-2022-3037047, indicated that the collection system is hydraulically overloaded. Please provide responses to the following:
 - a. Verify and provide evidence that the proposed connections for the Development are permitted under any PAWC-WD CMP;

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- b. Identify any portions of PAWC-WD’s existing collection system that will be used to convey wastewater from the Development to PAWC-WD’s Butler WWTP, that are currently hydraulically overloaded;
 - c. Provide an estimated cost of repairs or upgrades to PAWC-WD’s existing collection system that will be required to provide wastewater service to the requested service territory; and
 - d. Identify the source of funding that will be used to complete any required repairs or upgrades to PAWC-WD’s existing collection system to provide wastewater service to the requested service territory.
- A-8. In Section II, Paragraph 10 of the Application, PAWC-WD indicated that the collection system will consist of eight-inch diameter sewer main. Please specify the material type that will be used for the eight-inch diameter sewer main.
- A-9. The breakdown of costs provided as the Application’s Exhibit F does not identify the quantity, size, material type, or estimated cost of laterals from the wastewater main to the edge of the public right-of-way (Company-Owned Laterals). Please provide an estimated cost for the proposed Company-Owned Laterals, broken down by Development phase, quantity, size, and material type, and clarify if the estimated cost of Company-Owned Laterals was included in the total estimated construction cost identified in Exhibit F.
- A-10. In Section III, Paragraph 10 of the Application, the table describing the facilities to be installed within the Development indicated that nine sanitary manholes would be constructed. However, the Development plan provided as part of the Application’s Exhibit E appears to depict 17 sanitary manholes and the breakdown of costs provided in the Application’s Exhibit F identifies 16 manholes. Please clarify this apparent discrepancy and correct the Application’s F to identify an accurate number of manholes to be constructed and estimated cost.
- A-11. In Section III, Paragraph 12 of the Application, PAWC-WD indicated that the requested territory will generate an average wastewater flow of 24,800 gallons per day. Please quantify the projected average daily organic load from the requested territory at full buildout.
- A-12. In Section III, Paragraph 12 of the Application, PAWC-WD indicated that it has sufficient collection, conveyance, and treatment capacity to serve the proposed 62 customers at full buildout. However, this Section of the Application also indicated that for 2023, the Butler Township WWTP had a maximum daily flow of 23.585 million gallons per day (MGD), and a design maximum daily flow of 20 MGD. These identified flows appear to indicate that the Butler Township WWTP has daily flows exceeding the

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design maximum daily flow, potentially due to inflow and infiltration. Please confirm that PAWC-WD has sufficient collection, conveyance, and treatment capacity to provide wastewater service to the proposed 62 customers at full buildout.

- A-13. In Section III, Paragraph 15 of the Application, PAWC-WD indicated that the DEP issued a letter on November 16, 2023, approving Act 537 planning revisions. Please provide a copy of the referenced letter from DEP dated November 16, 2023.
- A-14. In Section IV, Paragraph 23 of the Application, PAWC-WD indicated that furnishing wastewater service in the requested territory will have no adverse effect upon the service furnished or the rates charged to other customers. Please explain how approval of the Application will benefit PAWC-WD's existing customers.
- A-15. The certificate of service indicates that the Application was served upon the Northeast Regional DEP office; however, Butler County is under the jurisdiction of the Northwest Regional DEP office. Please provide a certificate of service that shows a copy of the Application has been served upon the Northwest Regional DEP office.