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April 15, 2025

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

P-2024-3050266-AEL-4/16/25

**Re: Petition for Lead Service Line Replacement Program, Related Tariff Changes, Modification of Long-Term Infrastructure Improvement Plan and Waiver of Termination Regulations;
Docket No. ~~P-2025~~ _____**

Dear Secretary Chiavetta:

Attached for filing on behalf of Ambler Borough Water Department is a Petition for Approval of a Lead Service Line Replacement Program, Related Tariff Changes, Modification of Long-Term Infrastructure Improvement Plan and Waiver of Termination Regulations ("Petition"). This filing includes the following exhibits and documents as required by the Commission's Lead Service Line Replacement ("LSLR") Regulations at 52 Pa. Code §§ 65.51, et seq.

- A. Petition for Lead Service Line Replacement Program, Related Tariff Changes, Modification of Long-Term Infrastructure Improvement Plan and Waiver of Termination Regulations;
- B. Exhibit No. 1 – Lead Service Line Replacement Plan;
- C. Exhibit No. 2 – Service Line Inventory;
- D. Exhibit No. 3 – Pro Forma Tariff Supplement;
- E. Exhibit No. 4 - Data Responses to 52 Pa. Code Section 53.52

In accordance with 52 Pa. Code § 65.54(a), this Petition is being served upon the Bureau of Investigation and Enforcement, the Office of Consumer Advocate, the Office of Small Business Advocate, and parties of record in the Company's most recent base rate case at Docket No. R-2022-3031704 as set forth in the attached Certificate of Service. If any of the parties would like to receive a hard copy of the filing, one can be provided upon request.

Please contact the undersigned if you have questions related to this filing.

Very truly yours,

A handwritten signature in black ink, appearing to read 'A. Bakare', written over a horizontal line.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

Counsel to Ambler Borough Water Department

cc: Chief Administrative Law Judge Charles E. Rainey, Jr. (via e-mail)
Certificate of Service

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of the foregoing document upon the participants, listed below, in accordance with the requirements of Section 1.54 (relating to service by a participant).

VIA EMAIL

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Adeolu A. Bakare

Counsel to Ambler Borough Water Department

Dated this 15th day of April, 2025, in Harrisburg, Pennsylvania.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Ambler Borough Water
Department for Approval of a Lead Service
Line Replacement Program, Related Tariff
Changes, Modification of Long-Term
Infrastructure Improvement Plan, and
Waiver of Termination Regulations

Docket No. P-2024-3050266

**PETITION OF AMBLER BOROUGH WATER DEPARTMENT
FOR APPROVAL OF A LEAD SERVICE LINE REPLACEMENT PROGRAM,
RELATED TARIFF CHANGES, MODIFICATION OF
LONG-TERM INFRASTRUCTURE IMPROVEMENT PLAN,
AND WAIVER OF TERMINATION REGULATIONS**

Ambler Borough Water Department ("Borough" or "Water Department"), by and through its undersigned counsel, McNees Wallace & Nurick LLC, files its Petition for Approval of a Lead Service Line Replacement Program, Related Tariff Changes, Modification of Long-Term Infrastructure Improvement Plan, and Waiver of Termination Regulations ("Petition"). Pursuant to Section 1311(b)(2) of the Public Utility Code ("Code"), 66 Pa. C. S. § 1311(b)(2), and the Pennsylvania Public Utility Commission's ("Commission" or "PUC") Lead Service Line Replacement Regulations ("LSLR Regulations"), 52 Pa. Code § 65.51, *et seq.*, the Water Department seeks Commission approval of its plan to replace lead service lines ("LSLs"), including LSLs owned by the Water Department ("Water Department-Owned") and LSLs owned by the property owner ("Customer-Owned"),¹ and to recover the associated costs related to those replacements as set forth herein and in the Ambler Borough Water Department Lead Service Line Replacement Plan ("LSLR Plan"). In accordance with the LSLR Plan, proposed Tariff revisions,

¹ "Customer-Owned" refers to property that is owned by the customer of record and/or the property owner, and is not owned by the Water Department, even if the Water Department includes the property in rate base.

and applicable exhibits (collectively, "LSLR Program"), upon approval by the Commission, the Water Department will be able to begin replacing Customer-Owned LSLs at its sole cost and recover a return on and of those costs pursuant to Act 120. In support thereof, the Water Department submits the following:

I. INTRODUCTION

1. The Water Department is a municipal water distribution public utility certificated to provide service in designated service territory outside the Borough's municipal limits. The Water Department provides public water service to approximately 6,008 residential, commercial, industrial, and public customers across several municipalities in Montgomery County, Pennsylvania: Ambler Borough, Lower Gwynedd Township, Upper Dublin Township, Whitmarsh Township, and Whitpain Township. Approximately 2,159 customers are within the Borough, while approximately 3,849 customers are situated outside of Borough limits ("Township Area").

2. As a Pennsylvania public utility, the Water Department is subject to the regulatory authority of the Commission for the portion of its system outside of the Borough's municipal limits. The Water Department must also comply with drinking water, environmental and other operational standards established by the Pennsylvania Department of Environmental Protection ("PADEP") and the United States Environmental Protection Agency ("EPA"), including the Lead and Copper Rule ("LCR"). The LCR regulations promulgated by the EPA and PADEP require water utilities to, among other things, test drinking water inside older homes for lead and take additional action if more than ten percent (10%) of tap water samples exceed the lead

concentration limit (*i.e.*, 15 parts per billion).² The Water Department regularly monitors the drinking water in its distribution system in accordance with PADEP and EPA standards.

3. In October 2018, Pennsylvania Governor Wolf signed into law Act 120 of 2018 ("Act 120"), which became effective on December 23, 2018.³ 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 that remain in service across Pennsylvania subject to Commission approval.⁴ Specifically, Act 120 provides that replacing a customer-owned LSL does not make the utility the owner of the new service line on the customer's property.⁵ Act 120 also directs the Commission to establish standards to ensure a warranty on the utility's replacement work and reimburse customers who replaced LSLs at their own cost.⁶ Additionally, Act 120 establishes the accounting and ratemaking treatment of lead service line replacement ("LSLR") costs by providing that the Customer-Owned portion of LSLs may be included in a regulated utility's rate base upon which it is authorized to earn a return.⁷

4. Pursuant to Act 120, the Commission promulgated its LSLR Regulations at 52 Pa. Code § 65.51, *et seq.*, which became effective on July 23, 2022. 52 Pa. Code § 65.53 states that "[a] municipal corporation shall remove and replace all LSLs, within or connected to its water distribution systems, beyond its corporate limits, whether municipal corporation-owned or Customer-Owned, within 30 years from the effective date of this section." Moreover, pursuant to 52 Pa. Code § 65.55(a), a municipal corporation shall file an LSLR Program within 2 years of the effective date of this section, or by July 23, 2024.

² *Lead and Copper Rule: A Quick Reference Guide*, Pennsylvania Department of Environmental Protection (June 2020).

³ Act of October 24, 2018, P.L. 738, No. 120.

⁴ 66 Pa. C.S. § 1311(b)(2)(v)-(vi).

⁵ 66 Pa. C.S. § 1311(b)(2)(i).

⁶ 66 Pa. C.S. § 1311(b)(2)(vii).

⁷ 66 Pa. C.S. § 1311(b)(2)(i)-(iii).

5. On July 10, 2024, the Water Department filed a letter with the Commission requesting an extension of the deadline to file an LSLR Program through December 31, 2024. By Secretarial letter dated July 24, 2024, the Commission approved the requested extension. By letter dated December 17, 2024, the Water Department filed a letter-in-lieu of an LSLR Program summarizing plans for replacing LSLs. By Secretarial letter dated January 10, 2025, the Commission informed the Water Department that its previous correspondence did not provide the required information for approval of an LSLR Program. After this, the Water Department retained new PUC counsel to assist with this matter. Counsel filed a letter on February 5, 2025, indicating that the Water Department intended to file a proposed LSLR plan no later than April 15, 2025. By Secretarial letter dated February 12, 2025, the Commission granted the second extension.

6. Accordingly, the Water Department hereby requests approval of its LSLR Program in compliance with the Commission's LSLR Regulations to address the removal and replacement of lead service lines in its Township Area service territory.

II. LEGAL STANDARDS

7. Section 1311(b)(2)(i) of the Code provides that the value of the property of a public utility providing water service shall include the original cost incurred by the public utility for the replacement of a Customer-Owned LSL, performed concurrent with a scheduled utility main replacement project or under a Commission-approved program, but that the customer shall continue to own the replacement water service line.⁸ The original cost incurred is to be "deemed other related capitalized costs that are part of the public utility's distribution system,"⁹ and these costs may be allocated "among each customer, classes of customers and types of service."¹⁰

⁸ 66 Pa. C.S. § 1311(b)(2)(i)

⁹ 66 Pa. C.S. § 1311(b)(2)(ii)

¹⁰ 66 Pa. C.S. § 1311(b)(2)(iv)

8. Section 1311(b)(2) further provides that in connection with its request for Commission approval for the replacement of the Customer-Owned LSL, the utility must provide a new tariff supplement, which must include a cap on the maximum number of Customer-Owned LSLs that can be replaced annually.¹¹

A. Time for LSL Replacements.

9. The Water Department is a municipal corporation water public utility. Accordingly, it has until July 23, 2052 (30 years from the effective date of the LSLR Regulations) to replace all LSLs, whether Water Department-Owned or Customer-Owned.¹² In addition to the LSLR Regulations, the PADEP and the LCR also set forth requirements relating to the timing of LSL replacements.

B. LSLR Program Requirements

10. Pursuant to Sections 65.54 and 65.55(a) of the LSLR Regulations, a municipal corporation's petition seeking approval of an LSLR Program must:

- a. Be served upon the Commission's Secretary's Bureau, the Office of Consumer Advocate ("OCA"), the Commission's Bureau of Investigation & Enforcement ("I&E"), the Office of Small Business Advocate ("OSBA") and the parties of record in the Borough's most recent base rate case;¹³
- b. Include a modified Long Term-Infrastructure Improvement Program ("LTIIP") containing an LSLR plan that is a separate and distinct component thereof;¹⁴
- c. Include an LSLR Program that is filed within two years of the effective date of this section¹⁵ and includes:¹⁶
 - i. An LSLR plan as described in § 65.56 (relating to LSLR plan requirements);¹⁷

¹¹ 66 Pa. C.S. § 1311(b)(2)(v) and (vi)

¹² See 52 Pa. Code. § 65.53(b).

¹³ 52 Pa. Code § 65.54(a).

¹⁴ *Id.* at § 65.54(b).

¹⁵ See 52 Pa. Code § 65.55(a).

¹⁶ See 52 Pa. Code § 65.55(b).

¹⁷ See 52 Pa. Code § 65.55(b)(1).

- ii. A pro forma tariff or tariff supplement containing the proposed changes necessary to implement the entity's LSLR program as described in § 65.58 (relating to pro forma tariff or tariff supplement requirements);¹⁸ and
- iii. Information required by the Commission for filings under 66 Pa. C.S. § 1308 (relating to voluntary changes in rates), including statements required by § 53.52(a) (relating to applicability; public utilities other than canal, turnpike, tunnel, bridge and wharf companies).¹⁹

C. LSLR Plan Requirements

- 11. The LSLR plan must contain, at a minimum:
 - a. A service line inventory, which complies with EPA regulation at 40 C.F.R. 141.1--143.20, as enforced by the PADEP,²⁰ and identifies any underlying assumptions contained therein;²¹
 - b. A planning and replacements section,²² which includes, among other things:
 - i. The entity's projected annual investment in LSLRs and financing sources for same;
 - ii. The projected number of LSLs to be replaced each calendar year with explanation of how the projection was determined and a statement that the number is consistent with the entity's annual cap on LSL replacements;
 - iii. The prioritization criteria considered by the entity when developing the LSLR schedule;
 - iv. An explanation of the entity's processes and procedures to address emergency repairs or replacements which reveal LSLs;
 - v. The entity's processes and procedures to obtain acceptance of an LSLR prior to LSLR project commencement from the customer/property owner, processes following acceptance, and processes at completion of the LSLR project;

¹⁸ See 52 Pa. Code § 65.55(b)(2).

¹⁹ See 52 Pa. Code § 65.55(b)(3).

²⁰ See 52 Pa. Code § 65.56(a)(1) and (a)(3) (related to timing of inventory).

²¹ See 52 Pa. Code § 65.66(a)(4); *see also* 52 Pa. Code §§ 65.66(a)(5) and (a)(6) (requiring that the entity provide information to the Commission on the progress of its service line inventory in its annual LSLR program report and once complete, to incorporate the inventory into the next LSLR plan update).

²² 52 Pa. Code § 65.66(b).

- vi. The entity's lead/material recycling and disposal efforts, including a description of what the entity will do with proceeds from recycling and disposal efforts;
 - vii. The industry-accepted practices that the entity plans to use to replace entity-owned and customer-owned LSLs;
 - viii. A detailed explanation of how the entity's acquisition of water distribution systems will be integrated into the entity's efforts to complete LSLRs throughout its water distribution systems; and
 - ix. The procedure for documenting a customer/property owner's refusal of, or failure to accept, the offer by the entity to replace an LSL.
- c. A communications, outreach and education section, which complies with EPA regulations at 40 C.F.R. 141.85 (regarding public education and supplemental monitoring and mitigation requirements), and which includes copies of all printed and broadcast material to be distributed under the LSLR Program.²³

D. Minimum Requirements for Tariff Supplement

12. Section 65.58 of the LSL Regulations sets forth the proposed tariff changes that will be deemed necessary to implement the LSLR Program, addressing at a minimum:

- a. A cap on the number of LSLs that can be replaced annually;
- b. Information relating to service line demarcation, including a definition for customer-owned LSLs;
- c. Information related to partial LSL replacements;²⁴
- d. Reimbursements for prior customer-owned LSL replacements, as appropriate; and
- e. A warranty for the work performed by the entity or its contractor for a term of not less than two years, and coverage information.

E. Accounting Requirements

13. Section 65.60 of the LSL Regulations mandates that costs for LSL replacements must be recorded under separate and distinct subaccounts and, where applicable, permits the entity to defer income taxes related to LSL replacements under certain circumstances.

²³ 52 Pa Code § 65.56(c)(1).

²⁴ See also 52 Pa. Code § 56.62.

III. THE BOROUGH'S LEAD SERVICE LINE REPLACEMENT PROGRAM

14. LSL Regulations contain differing time frames as to when LSLs must be replaced.²⁵

The Water Department, as a municipal corporation, will replace all LSLs within thirty (30) years under the terms of its LSLR Plan, which is attached to this Petition as **Exhibit 1**.

A. Service Line Inventory

15. The Water Department has prepared a service line inventory for its Township Area ("Service Line Inventory."). The Service Line Inventory is attached to this Petition as **Exhibit 2**. It complies with the EPA's regulations at 40 C.F.R. 141.1–143.20, as enforced by PADEP. The Service Line Inventory will be updated annually, at a minimum, or as additional information becomes available. Likewise, if the Borough purchases any water distribution system in the future subject to Commission jurisdiction, the Service Line Inventory will be updated to include the acquired system's information and meet the deadlines set forth by the Commission.

16. The Water Department's Service Line Inventory identifies material types on both the Water Department-Owned and Customer-Owned sides of the service lines. All discovered lead components have been detailed.

17. There are no assumed service line materials in the Service Line Inventory.

B. Projected Annual Replacement

18. The Water Department plans to replace approximately 14 lead service lines per year. This projection was determined by estimating the total number of LSLs and assuming all lines for which status as LSL is unknown are LSLs. Based on that conservative approach, the Water Department projects to replace 419 LSLs under the program. After all existing records have been inventoried, the Water Department will review this annual projection and adjust as necessary. The average cost to replace a customer owned LSL is between \$7,000 and \$12,500. This estimated

²⁵ 52 Pa. Code § 65.53(a)-(b).

cost range is based on the variability of excavation depth, length of the LSL, and the extent of necessary restoration work, including concrete curb and sidewalk, lawn restoration, and/or street restoration. Based on these estimated costs, the Borough's projected annual investment in its LSLR Plan is \$175,000.

19. The cost incurred by the Water Department for LSLRs will be funded with a combination of commercial or government loans, cash from operations, and/or grants. Specifically, the Borough received a \$1 million grant for its LSLR Program from the Commonwealth Financing Authority through its Local Share Account Fund Program (which distributes gaming revenues for public interest projects). Moreover, pursuant to Act 120, the Borough may seek recovery of a portion of these costs in its Distribution System Improvement Charge ("DSIC") and/or in base rates in a future base rate proceeding, where appropriate and as applicable.

C. Prioritizing Lead Service Line Replacements

20. The Water Department will have three simultaneous procedures for replacing LSLs, including: (1) replacing LSLs in conjunction with old main replacements; (2) replacing LSLs discovered by mechanical excavation; and (3) replacing Customer-Owned LSLs discovered inside a building:

21. With respect to replacing LSLs in conjunction with old main replacements (procedure #1):

a. *Determination of target areas.* The Water Department 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 target area, the Water Department 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.

b. *Identification of line materials.* Prior to the work being initiated, Water Department staff will contact customers within an LSLR project area at least two times to determine if there are Customer-Owned LSLs, to verify the presence of Customer-Owned LSLs, and to provide the customers with detailed information regarding the routine procedures and the potential health risks involved.

22. With respect to replacing LSLs discovered during mechanical excavation (procedure #2), areas with a higher likelihood of having lead service lines will be prioritized for these projects. The Water Department 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/or the property owner to have the service line replaced.

23. With respect to replacing Customer-Owned LSLs discovered inside a building (procedure #3), the Water Department will reach out to customers with lead, galvanized requiring replacement, or unknown service lines. These customers will receive documentation describing the health effects related to lead. See **Appendix A** attached to the LSLR Plan for a draft copy of the documentation. The customers 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** attached to the LSLR Plan for related documentation.

24. Water Department staff will also check and document 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. The Water Department will schedule to replace Customer-

Owned lead service lines in accordance with the Tariff. If the Borough side is lead, it will be replaced at the same time with the customer side. These replacements will occur as discovered.

25. Determination of LSLR projects under these procedures will be prioritized based on targeted sensitive populations as defined by the EPA 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.

26. A list of sensitive populations will also be 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.

D. Emergency Repairs and Replacements

27. If a lead service line is leaking or otherwise defective at the time it is discovered during an emergency, the Water Department will replace the lead service line in accordance with the Tariff. Water Department 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.

28. If an emergency LSLR replacement would cause the Water Department to exceed its annual cap, the Borough proposes that it be allowed to increase its current annual cap by the number and cost of the emergency replacement(s) and decrease its next annual cap by the same

number and cost. This process would be akin to the process used for any reimbursements that cause the Borough to exceed its annual cap.²⁶

E. Processes and Procedures to Obtain Acceptance of an LSLR

29. When a lead service line is discovered at a property, the Water Department will contact the customer(s) and/or 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** of the LSLR Plan. Water Department staff will then inform the customer(s) and/or property owner of the process to schedule to have their service line replaced and when the scheduled replacement is to occur.

30. Prior to replacing the property owner's portion of a lead service line, an agreement between the Borough and the property owner, or representative of the property owner, must be signed ("Property Owner Agreement"). See **Appendix C** of the LSLR Plan. The Water Department will keep these forms on file. As set forth in the Property Owner Agreement, ownership of the Customer-Owned portion of a service line will not change as part of the LSLR Plan. The customer or property owner will continue to be subject to the general responsibility to maintain the Customer-Owned portion of the service line.

31. 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** of the LSLR Plan for a model form letter, which the Water Department will adapt to accommodate different communication formats. Customers will be given a pitcher-filter prior to the LSLR. Instructions on how to use the pitcher-filter are provided. If a customer cannot be contacted prior to the LSLR, a note will be placed in an area notifying the customer to collect, or have delivered, a pitcher-filter. See **Appendix G** of the LSLR Plan. If the

²⁶ See Section IV.E, *infra*; see also 52 Pa. Code § 65.58(d)(2).

affected service line serves more than one residence, such as a multi-unit building or a non-residential unit, the Water Department will provide the documentation and pitcher-filter to every unit in the building.

F. Water Department Practices in Replacing Lead Service Lines

32. **Appendix E** of the LSLR Plan details the Water Department's LSLR routine procedure for working with customers to replace lead service lines. These procedures will be publicly available at the Borough office and on the Water Department website. The Water Department will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process, and fill and seal any wall or floor penetrations in a private residence. The Water Department will also grade and re-seed backfilled trenches, but the Water Department will have no maintenance responsibility with respect to the restored property. No other restoration will be conducted for LSLRs. The Water Department will not replace any landscaping, interior finishes, paving, or walkways. Except as stated above, all restoration costs shall be borne by the customer or property owner, if the customer is not the property owner.

33. As part of its replacement efforts, the Water Department 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.

34. Under atypical circumstances, the Water Department may utilize guided boring to install new pipe along a different route or use open trench excavation to remove and 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 property like a finished basement with limited access to the water meter and plumbing.

35. All lead pigtails, goosenecks or connectors attached to a lead line will likewise be replaced and removed.

36. New service line installations will be copper or plastic material at the Water Department's discretion.

G. Post-Replacement Procedures

37. After an LSLR, the Water Department will assist customers with the flushing of the customer's interior plumbing. Information on flushing, which is found in **Appendix H** of the LSLR Plan, will be provided to all customers that have an LSLR. A detailed description of how to flush will also be found on the Water Department website.

38. The Water Department will also update the Service Line Inventory as LSLRs are completed.

39. After each replacement is completed, the Water Department will document the pipe-specific information required pursuant to 52 Pa. Code § 56.59 to submit to the Commission as part of its annual asset optimization plan ("AAO Plan") filings under 52 Pa. Code § 121.6. See **Appendix I** of the LSLR Plan.

H. Recycling and Disposal Efforts

40. The Water Department will dispose of or recycle LSLs at an appropriate facility to ensure proper disposal of all lead. The Water Department does not anticipate profiting from disposing of or recycling LSLs. However, any proceeds from such efforts will be reflected in Water

Department operating revenue. Neither the customer nor the property owner will have any right to the proceeds of a recycled or disposed LSL. The Water Department will keep copies of LSL scrap receipts on file.

I. Integrating Future Acquisitions of Water Distribution Systems

41. The Borough has no plans to expand existing facilities; however, if the Borough were to acquire Commission-jurisdictional water distribution systems in the future, the Water Department would update its service line inventory in accordance with 52 Pa. Code § 65.56(a)(2) at the time of completing the acquisition.

42. Moreover, based upon the results of the updated inventory, the Water Department may seek Commission approval to revise its LSLR Plan to increase the annual cap on LSLRs, if necessary.

J. LSLR Refusal

43. If a customer or property owner refuses to grant permission to the Water Department to replace the lead service line or refuses to have it replaced, the Water Department will:

- a. Provide the customer and property owner with a complete disclosure of the known health hazards from the continued use of an LSL, such as **Appendix A** of the LSLR Plan;
- b. 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

- c. Communicate to the customer and property owner that failure to allow Ambler Borough to complete the LSLR or to replace the Customer-Owned LSL concurrent with replacing the Water Department-Owned LSL may lead to termination of water service under the provisions of the Water Department Tariff.

44. If the customer or property owner, if the customer is not the property owner, still refuse replacement of the Customer-Owned LSL, the Water Department will require the customer or property owner, if the customer is not the property owner, to sign a form documenting their refusal. See **Appendix K** of the LSLR Plan. If the customer or property owner refuses or fails to sign the refusal form, the Water Department will make a record of and document the refusal.

45. The Water Department will then schedule to replace the Water Department portion of the LSL and notify the customer or property owner, if the customer is not the property owner, in writing of the partial LSLR no later than ten days prior to the scheduled replacement; the Water Department will terminate water service at that location the day prior to replacing the Water Department-Owned LSL. The Water Department is requesting that the Commission deem such notice and termination consistent with Chapter 14 of the Public Utility Code and that the Water Department is not required to comply with termination procedures described in other portions of its Tariff or the Commission's regulations. See Section VIII, *infra*.

46. The Water Department will not connect an applicant to water service ("Applicant") where a property owner previously refused or failed to accept the Water Department's offer of an LSLR until the Applicant verifies the replacement of the Customer-Owned LSL by providing a

paid invoice from a licensed contractor or notarized statement from a licensed contractor attesting to completion of the Customer-Owned LSL replacement on the Applicant's property.

K. Publicly Accessible Website

47. The Water Department will add lead service line documentation to its website within one (1) year of Commission approval of its LSLR Program. A tab will be created on the website's main page, which will link a user to a specific page about lead service lines. Appendices A, B, F, H, and M will be made available on the website through links. These documents provide information about LSLR routine procedures, flushing, determination of service line material, and the health effects associated with lead.

48. 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 on when LSLR projects will occur.

49. Any community outreach programs or coordination efforts will be posted on the Borough's website.

IV. RELATED TARIFF CHANGES

50. Attached as **Exhibit 3** to this Petition is a Pro Forma Tariff Supplement to Tariff Water – Pa. P.U.C. No. 5 ("Pro Forma Tariff"), which sets forth the proposed tariff changes in compliance with 52 Pa. Code § 56.58. The Pro Forma Tariff addresses the following regulatory requirements set forth by the Commission.

A. Annual Cap

51. The Water Department proposes to limit LSLRs to 20 Customer-Owned LSLs on an annual basis. This is consistent with the Water Department's annual LSLR projections to replace an average of 14 LSLRs per year, as the cap exceeds the projection in recognition the reality that

the number of actual replacements in a given year may vary. Further, as discussed below, if a customer reimbursement or an emergency LSLR causes the Water Department to exceed its annual cap, the Water Department 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.

B. Ownership of the Service Line

52. The Water Department has defined the Customer-Owned LSL as the portion of the lead service line extending from the curb stop to the meter or the first shut-off valve inside a building foundation, whichever is farther. The curb stop is further defined as "[a] water service shutoff valve located in a water service line near the curb or edge of street and between the water main and the building." This is consistent with the Commission's definition at 52 Pa. Code § 65.52. The Water Department also proposes that if a shutoff valve is not located within 12 inches of the structure wall, the Water Department 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.

53. The Water Department proposes in its Pro Forma Tariff, attached as **Exhibit 3**, that it will use the LSLR planning process to perfect its ownership of the portion of the service line located within the then-existing right-of-way to ensure that the Water Department can obtain necessary permits during the planning phase of an LSLR project.

C. Prohibition on Partial LSLRs

54. The Pro Forma Tariff also sets forth the following regarding the prohibition on partial LSLRs:

a. Neither a customer nor a property owner may install a partial LSLR. A partial LSLR installed after Commission approval of the LSLR Plan may result in immediate termination of service until such time as the Water Department can replace the Water Department-Owned LSL under 52 Pa. Code § 65.62 (relating to prohibition on partial LSLRs). The Water Department requests Commission approval that immediate termination shall be deemed consistent with Chapter 14 of the Public Utility Code and that the Water Department is not required to comply with termination procedures described in other portions of its Tariff or the Commission's regulations.

b. 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 Water Department replacing the Water Department-Owned LSL; provided that the customer or property owner, if the customer is not the property owner, shall provide the Water Department at least 180 days' notice prior to replacing the Customer-Owned LSL.

c. The Water Department will not connect an Applicant for water service to the Water Department-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 Water Department's offer of an LSLR until the Applicant verifies the replacement of the Customer-Owned LSL by providing a paid invoice from a licensed contractor, where applicable, or a

verified statement from a licensed contractor attesting to completion of the Customer-Owned LSLR.

D. Non-Owner Occupied Properties

55. Where the Water Department is aware that (1) a property has an LSL, (2) the property is not occupied by its legal owner, and (3) the property owner cannot be identified, located, or has failed to respond to multiple attempts by the Water Department to replace the Customer-Owned LSL at no direct cost to the property owner, the Water Department proposes to, in its sole discretion, replace the Customer-Owned LSL without obtaining authorization from the property owner to prevent termination of water service. The Water Department believes this provision is reasonable and in the public interest to prevent extended periods of termination of service to tenants as a result of a nonresponsive property owner.

E. Reimbursements

56. The Water Department proposes to reimburse an eligible customer or property owner, if the customer is not the property owner, who replaced their LSL within an LSLR Project Area within 1 year before or after an LSLR project commencement.

57. To obtain a reimbursement, the Water Department has prepared a reimbursement form that will be available on the Water Department website ("LSLR Reimbursement Form"). See **Appendix J** of the LSLR Plan. To obtain a reimbursement, the customer or property owner will be responsible to provide, among other things, proof of the existence of an LSL at the property, proof the customer-owned LSL was replaced by a copper service line, a detailed estimate of work from the contractor, and a paid invoice. Instead of a detailed estimate, a verified statement from the contractor attesting to completion of an LSLR with a new copper service line may be sufficient, at the Water Department's sole discretion. Unless otherwise approved by the Water Department, only

customer-owned service line replacements installing copper service lines will be eligible for reimbursement.

58. Eligible customers or property owners seeking reimbursement for their LSLR can complete the form and either mail, e-mail, fax, or hand deliver a copy of the documents to the Water Department.

59. A customer or property owner, if the customer is not the property owner, located within an LSLR Project Area is eligible for a reimbursement of LSLR expenses up to a limit of 125% of the average cost over the last twelve (12) months, on a rolling basis, the Water Department would have incurred to perform the replacement of a similarly-sized service line, not to exceed the actual cost. To track these costs, for every LSL replaced by the Water Department, an LSLR cost form will be completed ("LSLR Cost Form"). See **Appendix I** of the LSLR Plan. The Water Department will use these completed forms to establish the reimbursement amount for the customers who choose to use their own contractors. As LSLRs are completed, LSLR costs will also be added to a spreadsheet to maintain a current calculation of the reimbursement limit.

60. Upon submission of the LSLR Reimbursement Form, the Water Department will review the information that was provided with the form within ninety (90) days to determine eligibility for a reimbursement. If sufficient information has not been provided at the time of submitting the reimbursement form, the Water Department will contact the customer or property owner to request the necessary information to determine eligibility. The Water Department will have an additional forty-five (45) days from the time it receives the requested additional information to determine reimbursement eligibility. 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 Water Department will issue a check within ninety (90) days after verifying that the customer or property owner is eligible for reimbursement.

61. If the reimbursement causes the Water Department to exceed its annual cap on LSLR expenditures, as defined in the Pro Forma Tariff, the Water Department will increase its current annual cap by the amount of the reimbursement and decrease its next annual cap by that same amount.

F. Warranty

62. The Water Department proposes a two-year warranty for materials and workmanship commencing from the date the Customer-Owned LSL replacement is complete.

63. This warranty will cover repairs conducted by the Water Department, or a contractor at the Water Department's request, of the replaced Customer-Owned service line up to \$2,500 per customer, so long as the customer allows access to the property for repairs.

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

65. Lastly, the warranty will cover the restoration of surfaces, which refers to backfilling excavation and returning grade to level. However, it will not include replacing sidewalks, stone or asphalt driveways, or landscaping outside of a right-of-way.

V. MODIFIED LTIIP

66. The Water Department is in the process of modifying its LTIIP to reflect the Water Department's LSLR Plan as a separate and distinct component of its LTIIP pursuant to 52 Pa. Code § 65.54(b) and requests that the Commission grant a limited waiver authorizing conditional

approval of the Water Department's LSLR Plan subject to the Water Department's filing of the modified LTIP.

VI. ACCOUNTING AND RATEMAKING TREATMENT FOR CUSTOMER-OWNED LSL REPLACEMENT COSTS

67. Pursuant to Act 120, the Water Department will record the original cost of Customer-Owned LSLRs in a separate account that is segregated from other service line accounts as required by the LSL Regulations. Further, pursuant to Act 120, the Water Department is entitled to record a return on and of its investment to replace Customer-Owned LSL replacements in future base rate cases and through its existing DSIC in between rate cases.

VII. AMBLER BOROUGH WATER DEPARTMENT'S LSLR PROGRAM IS IN THE PUBLIC INTEREST

68. Federal and Pennsylvania regulations impose an obligation on water systems to provide drinking water that is below the lead action level at the customer's tap regardless of whether the lead originates in the Customer-Owned or the Water Department-Owned portion of the service line.²⁷ These requirements were developed in response to the serious health effects associated with the ingestion of lead.

69. To that end, the Water Department's LSLR Program seeks to replace both the Water Department-Owned and Customer-Owned portion of any lead service lines, including galvanized service lines requiring replacement, in accordance with the requirements set forth by the Commission in its LSLR Regulations.

70. Ambler Borough Water Department's LSLR Program is a comprehensive solution to address lead service lines in its system in an expeditious manner to address the recognized health risk posed by lead in drinking water. Accordingly, it is in the public interest and should be approved by the Commission.

²⁷ See 40 C.F.R. § 141.80(c)(2); 25 Pa. Code § 109.1102(a)(1).

VIII. WAIVER OF TERMINATION REGULATIONS

71. Section 65.62(c) of the Commission's LSLR Regulations state that "[w]here a customer or property owner, if the customer is not the property owner, refuses, or fails to accept, an entity's offer to replace a customer-owned LSL, the entity shall replace the entity-owned portion of the LSL in accordance with the entity's LSLR plan and terminate service in accordance with the entity's tariff."²⁸ The LSLR Regulations also provide that an entity shall terminate service where there is reasonable evidence indicating service is being provided through a partial LSLR that was installed after the effective date of the Commission's LSLR Regulations.²⁹

72. In its Final Rulemaking Order, the Commission stated that "to resolve concerns regarding terminations, [public utilities] may petition the Commission for a waiver of the termination requirements under 52 Pa. Code § 5.43."³⁰

73. The Commission may waive its regulations if the waiver is in the public interest under the Commission's statutory authority to rescind or modify regulations or orders.³¹ A petition for waiver of a Commission regulation "must set forth clearly and concisely the petitioner's interest, the relevant legal authority, the purpose of the petition, and the facts claimed to constitute the grounds requiring waiver of the regulation."³² Upon review of a petition for waiver, the Commission will grant the petition if it shows "clearly articulated and supported demonstration of good cause or actual need."³³

74. As part of its LSLR Plan, the Water Department is proposing in its Pro Forma Tariff an expedited process to terminate service where (1) a customer or property owner refuses the

²⁸ 52 Pa. Code § 65.62(c).

²⁹ 52 Pa. Code § 65.62(d).

³⁰ *Rulemaking to Implement Act 120 of 2018 at 52 Pa. Code Chapters 65 and 66*, Docket No. L-2020-3019521, 2022 WL 798227, at *43 (Final Rulemaking Order entered Mar. 14, 2022).

³¹ *Duquesne Light Petition for Waiver of the Three Business Day Switching Requirements Under 52 Pa. Code § 57.174*, Docket No. P-2014-2448863, at 8 (Order entered Dec. 4, 2014) (citing 66 Pa. C.S. § 501(a)).

³² *Id.* at 7.

³³ *Id.* at 10.

Water Department's offer to replace the Customer-Owned LSL, (2) a neighboring property refuses to allow the Water Department to access their property to allow the work necessary to replace a Customer-Owned LSL, or (3) the Water Department has reasonable evidence to indicate that a property is being served by a partial LSLR installed after Commission approval of the Water Department's LSLR Plan.

75. As set forth in Section III.J, *supra*, where a customer or property owner in cases where the property owner is not a customer refuses an offer to replace the Customer-Owned LSL, or where a neighboring property refuses to allow the Water Department access to the property to complete the LSLR, the Water Department will schedule to replace the Water Department-Owned portion of the LSL and notify the customer(s) and/or property owner(s) 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 Water Department-Owned LSL.

76. As set forth in Section IV.D, *supra*, where the Water Department has reasonable evidence indicating that a customer is being served by a partial LSLR installed after Commission approval of the Water Department's LSLR Plan, the Water Department shall immediately terminate service until such time as the Water Department can replace the Water Department-Owned LSL.

77. Refusal to replace an LSL and installation of a partial LSLR after Commission approval of the Water Department's LSLR Plan both constitute Tariff violations that "endanger the safety of a person," and the Water Department should be allowed to immediately terminate service pursuant to 52 Pa. Code § 56.98(a)(4) ("A public utility may immediately terminate service for any of the following actions by the customer:... Violating tariff provisions on file with the Commission which endanger the safety of a person"). The Pro Forma Tariff prohibits partial LSLs. When a

customer or property owner, where the customer is not the property owner, either (1) installs a partial LSL, or (2) refuses replacement of the Customer-Owned LSL and thus causes a partial LSL when the Water Department replaces the Water Department-Owned LSL, a tariff violation has occurred. The Commission has already concluded that service through a partial LSL endangers the health and safety of people that may drink water delivered through the partial LSL.³⁴

78. The Water Department seeks the Commission's confirmation that the Water Department can terminate service in these circumstances as proposed, consistent with 52 Pa. Code § 56.98(a)(4). In the alternative and to the extent necessary, the Water Department is requesting a waiver of the Commission's termination regulations solely within the context of implementing its LSLR Plan. This includes a waiver of the following:

- a. 52 Pa. Code § 55.2 (relating to personal contact before utility service discontinued);
- b. 52 Pa. Code § 56.91 (relating to general notice provisions and contents of termination notice);
- c. 52 Pa. Code § 56.92 (relating to notice when dispute pending);
- d. 52 Pa. Code § 56.93 (relating to personal contact);
- e. 52 Pa. Code § 56.94 (relating to procedures immediately prior to termination);
- f. 52 Pa. Code § 56.95 (relating to deferred termination when no prior contact);
- g. 52 Pa. Code § 56.96 (relating to post-termination notice);
- h. 52 Pa. Code § 56.97(a)(3)-(4) and (b) (relating to procedures upon customer or occupant contact prior to termination);

³⁴ *Rulemaking to Implement Act 120 of 2018*, Final Rulemaking Order at n.11, Docket No. L-2020-3019521 (Order entered Mar. 14, 2022) ("As stated in the NOPR, in *Implementation of Chapter 32 of the Public Utility Code Regarding Pittsburgh Water and Sewer Authority — Stage 1*, Docket No. M-2018-2640802 (Order entered June 18, 2020), the Commission determined that partial LSLRs are not in the public interest and are not consistent with the statutory requirements of 66 Pa.C.S. § 1501. *Id.* at 93-94. The Commission noted that '[t]he negative effects of partial service line replacements are well documented in scientific literature' and that '[t]he permanent negative health effects from lead exposure, especially to uniquely vulnerable populations of developing fetuses, infants and children, is explained in the unrebutted testimony of [UNITED's expert witness] Dr. Lanphear.' *Id.* at 92.").

- i. 52 Pa. Code § 56.100 (relating to winter termination procedures);
- j. 52 Pa. Code § 56.111 (relating to medical certificate termination procedures);
- k. 52 Pa. Code § 56.112 (relating to postponement of termination pending receipt of certificate);
- l. 52 Pa. Code § 56.114 (relating to length of postponement; renewals);
- m. 52 Pa. Code § 56.140 (relating to follow-up response to inquiry);
- n. 52 Pa. Code § 56.141 (relating to dispute procedures);
- o. 52 Pa. Code § 56.151 (relating to general rule of dispute procedures);
- p. 52 Pa. Code § 56.331 (relating to general notice provisions and contents of termination notice);
- q. 52 Pa. Code § 56.332 (relating to notice when dispute pending);
- r. 52 Pa. Code § 56.333 (relating to personal contact);
- s. 52 Pa. Code § 56.334 (relating to procedures immediately prior to termination);
- t. 52 Pa. Code § 56.335 (relating to deferred termination when no prior contact);
- u. 52 Pa. Code § 56.336 (relating to post-termination notice);
- v. 52 Pa. Code § 56.337(a)(3)-(4) and (b) (relating to procedures upon customer or occupant contact prior to termination);
- w. 52 Pa. Code § 56.340 (relating to winter termination procedures);
- x. 52 Pa. Code § 56.351 (relating to medical certificate termination procedures);
- y. 52 Pa. Code § 56.352 (relating to postponement of termination pending receipt of certificate);
- z. 52 Pa. Code § 56.354 (relating to length of postponement; renewals);
- aa. 52 Pa. Code § 56.371 (relating to follow-up response to inquiry);
- bb. 52 Pa. Code § 56.372 (relating to dispute procedures);
- cc. 52 Pa. Code § 56.381 (relating to general rule of dispute procedures).

79. The Water Department's waiver of these regulations is in the public interest because the Water Department's expedited termination process will allow the Water Department to quickly and concisely address any issues with customers or property owners preventing the Water Department from eliminating all LSLs currently active in the Water Department's jurisdictional service territory. This is also consistent with the Commission's LSLR Regulations which require termination of service in the event of a partial LSLR because it endangers the health and safety of the people that may drink water delivered through the partial LSL.

IX. NOTICES

80. The name, address, and contact information for the Water Department's counsel in this matter is as follows:

Adeolu A. Bakare (I.D. No. 208541)
Matthew L. Garber (I.D. No. 322855)
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All pleadings, orders, notices, correspondence, and other documentation with respect to this matter should be directed to the above counsel.

81. Notice of this Petition has been provided to the individuals and entities as required by Section 65.54(a) of the LSL Regulations and as reflected on the Certificate of Service provided herewith.

X. CONCLUSION

WHEREFORE, Ambler Borough Water Department respectfully requests that the Commission grant its Petition and enter an Order:

- A. Approving the Water Department's proposed LSLR Program;
- B. Approving the Water Department's LSLR Plan as set forth in Section III, *supra*, and as set forth in Exhibit 1 accompanying this Petition;
- C. Approving the Water Department's Pro Forma Tariff as set forth in Exhibit 3 and authorizing the Borough to file the Pro Forma Tariff effective on one-days' notice;
- D. Approving the Water Department's request for a limited waiver seeking conditional approval of the LSLR Plan subject to the Water Department's filing of a modified LTIP;
- E. Approving the Water Department's proposal to record the costs of the Customer-Owned LSL replacements in a separate, segregated subaccount and to recover a return on and a return of its investment in the replacement of Customer-Owned LSLs, pursuant to 66 Pa. C.S. § 1311(b)(2)(iii); and
- F. Either confirming that the Water Department's proposed termination procedures are authorized pursuant to 52 Pa. Code § 56.98(a)(4) or granting a waiver of the Commission's termination regulations as set forth in Section VIII of this Petition and allowing the Water Department to implement its proposed termination procedures for LSLR refusals and discovery of partial LSLRs.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By: 

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Counsel to Ambler Borough Water Department

Exhibit 1

AMBLER BOROUGH WATER DEPARTMENT LEAD SERVICE LINE REPLACEMENT PLAN

Definitions

Refer to the Ambler Borough Water Department Tariff for definitions.

1.0 – SERVICE LINE INVENTORY

Ambler Borough Water Department ("Borough" or "Water Department") has prepared an inventory of all service lines in its territory subject to Pennsylvania Public Utility Commission ("PUC" or "Commission") jurisdiction ("Service Line Inventory"). The Service Line Inventory complies with the current United States Environmental Protection Agency ("EPA") 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 the Borough purchases any water distribution system in the future subject to Commission jurisdiction, the Service Line Inventory will be updated to include the acquired system's information and to meet the deadlines set forth by the Commission.

2.0 – PLANNING

Annual Projections

The Water Department estimates it can replace up to approximately fourteen (14) lead service lines ("LSLs") per year under its LSLR Plan. This projection was determined by estimating the total number of LSLs and assuming all lines for which status as LSL is unknown are LSLs. Based on that conservative approach, the Water Department projects to replace 419 LSLs under the program. The Water Department will continue to review this annual projection and adjust it as necessary. The annual cap for customer-owned lead service line replacements ("LSLRs") is twenty (20) customer-owned LSLs.

Prioritization of Lead Service Line Replacements

Determination of LSLR projects will be prioritized based on targeted sensitive populations as defined by the EPA 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.

A list of sensitive populations will also be developed. 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.

Replacing Lead Service Lines in Conjunction with Old Main Replacements

LSLR Project Areas will be planned in conjunction with replacements of old mains. Records 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, the Water Department 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.

Prior to the work being initiated, Water Department staff will contact customers within an LSLR Project Area at least two times once an LSLR Project Area has been identified 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 telephone 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 replacement. The Water Department 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 a Building

The Water Department 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. Water Department staff will check and document service line material in conjunction with meter changes. Customers who discover an LSL may call and schedule to have their service line replaced. The Water Department will schedule to replace customer-owned LSLs in accordance with the Tariff. If the Water Department side of the service line is lead, it will be replaced at the same time with the Customer side. These replacements will occur as discovered.

Emergency Replacements

If an LSL is leaking or otherwise defective at the time it is discovered, the Water Department will replace the LSL in accordance with the Tariff. Water Department staff will maintain the proper equipment and tools necessary for emergency service line replacements. If an LSL is discovered during an emergency but is not leaking, the replacement of the line will be scheduled for replacement at a later date.

3.0 – REPLACEMENT COORDINATION

Coordination with the Property Owner and Customer(s)

When an LSL is discovered at a property, the Water Department 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.

Water Department staff will then let the customer(s) and property owner know how to schedule a service line replacement.

Prior to replacing the property owner's portion of a lead service line, an agreement between Ambler Borough 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.

Refusal of Lead Service Line Replacement

If a customer or property owner refuses to grant permission to the Borough to replace the lead service line or refuses to have it replaced, the Water Department will (1) provide the customer and property owner, if the customer is not the property owner, with a disclosure of the known health hazards from the continued use of an LSL (see Appendix A); (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 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 the Water Department to complete the LSLR or to replace the customer-owned LSL concurrent with replacing the Water Department-owned LSL may lead to termination of water service under the provisions of the Tariff.

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

The Water Department will then schedule to replace its portion of the Water Department-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 Water Department-owned LSL. The Water Department will not connect an Applicant to water service where a property owner previously refused or failed to accept the utility's offer of an LSLR until the Applicant verifies that the replacement has been completed. The Applicant may verify the replacement of a customer-owned LSL by providing either a paid invoice from a licensed contractor or a notarized statement from a licensed contractor that attests to completion of the LSLR.

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

Premises Not Owner-Occupied

The Water Department may stand in the shoes of the property owner and is authorized to replace a customer-owned LSL when: (1) the Water Department 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 Water Department has made attempts to obtain authorization for the customer-owned 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 Water Department has notified the legal owner but the owner did not respond.

In such instances, and when, in the sole discretion of the Water Department, replacing the customer-owned LSL and preventing the termination of water service would be reasonable and in the public interest, the Water Department may provide the customer with the option to execute a consent form for the LSLR. Upon execution of the customer consent form, the Water Department may proceed to make the replacement without obtaining authorization from the property owner. In any such instance of replacement, the Water Department, and any person associated with the Water Department, 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 Water Department 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.

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

Warranty

Upon completion of an LSLR by the Water Department or a contractor at the Water Department's request, a Completion-Agreement Form must be signed by the Borough and the property-owner, or representative of the property-owner. See Appendix D. From the date of the Lead Service Line Replacement Completion Form, the Water Department 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 Water Department or a contractor at the Water Department'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 Water Department shall have no liability for any damages not covered by the warranty.

4.0 – REPLACEMENT PROCESS

LSLR Routine Procedure and Restoration

The Water Department 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. The Borough may also utilize guided boring to install new pipe along a different route or using open trench excavation to 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 at the Water Department's discretion.

See Appendix E for the LSLR Routine Procedure. These procedures will be publicly available at the main office and on the Water Department website. The Borough 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. The Water Department will also grade and re-seed backfilled trenches, but the Water Department will have no maintenance responsibility with respect to the restored property. No other restoration will be conducted for Lead Service Line Replacements. The Borough will not replace any landscaping, interior finishes, paving, 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 Water Department will hand-deliver customer(s) affected by an LSLR with a water 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. If a customer is not home at the time of delivery, the Water Department will use a door hanger indicating how a water pitcher filter can be obtained. A follow-up telephone call will also be made to the customer to determine whether they received the door hanger and to inform them that they should either pick their water pitcher filter up at the Borough office of 131 Rosemary Avenue, Ambler, PA 19002, or schedule to have someone deliver the water pitcher filter 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, the Water Department will provide the documentation and water pitcher filter to every unit in the building.

Flushing

The Water Department will assist customers with the flushing of the customer's interior plumbing after an LSLR. See Appendix F. Information on flushing will be provided to all customers that have an LSLR. See Appendix H for example flushing instructions. A detailed description of how to flush will also be found on the Water Department website.

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 Water Department operating revenue. The customer will not have any right to the proceeds of a recycled lead service line.

5.0 – CUSTOMER-COMPLETED REPLACEMENTS

Reimbursement

No later than 30 days after an LSLR project begins ("LSLR Project Commencement") in an area of the Water Department's service territory ("LSLR Project Area"), the Water Department will mail Appendix J and a letter detailing eligibility for an LSLR reimbursement and instructions on how to obtain the reimbursement to customers who may be eligible within the LSLR Project Area. Any documentation necessary for a customer or owner to receive reimbursement shall be mailed physically to customers and property owners. Such documentation will also be sent electronically on a reasonable best-efforts basis where the Water Department has the customer or property owner's email address. Relevant forms will be available on the Water Department's website.

If an eligible customer chooses to use their own contractor to replace the customer-owned service line, the Water Department shall reimburse the customer for the replacement cost of the customer-owned lead service line, where the customer installed a copper service line and otherwise meets eligibility requirements. See Appendix J for the Reimbursement Form. Unless otherwise approved by the Water Department, only customer-owned service line replacements installing copper service lines will be eligible for reimbursement. Customers are to use this as a guide for determining eligibility for reimbursement, and ensuring they have the correct documentation for reimbursement. For every LSL replaced, an LSLR Cost Form will be completed. See Appendix I for the LSLR Cost Form. The Water Department will use these completed forms to establish the reimbursement amount for the customers who choose to use their own contractors. Reimbursements will occur in a manner that is consistent with the Tariff and PUC guidelines.

6.0 – WATER DEPARTMENT BUDGET & REPORTING

Financial Considerations and Funding

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

The cost incurred by the Borough for LSLRs will be funded with a combination of commercial or government loans, cash from operations, DSIC revenue, or grants.

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 I for this document. This information will be compiled annually for the LSLR Program Report.

List of Appendices:

Appendix A: Brochure Lead Information
Appendix B: How to Check Your Service Line Material
Appendix C: LSLR Property Agreement Form
Appendix D: LSLR Completion Form
Appendix E: LSLR Routine Procedure
Appendix F: LSLR Information
Appendix G: LSLR Pitcher Filter Card
Appendix H: Flushing After Your LSLR
Appendix I: LSLR Cost
Appendix J: Reimbursement Form
Appendix K: Refusal Form

Appendix A

LET'S GET THE LEAD OUT!



Is Lead in Your Plumbing?

Today, there's growing awareness that some homes have lead in water pipes, fixtures and plumbing. Lead presents health concerns for people of all ages and particularly for infants and young children. In children, low levels of exposure have been linked to learning disabilities, behavioral problems and other issues.

Where water meets lead

The water leaving the treatment plant and traveling through water mains is almost always free of lead. However, lead is sometimes present in pipes connecting older homes to the water system or in fixtures and home plumbing. Water utilities adjust the water's chemistry at the treatment plant to minimize the possibility of lead dissolving into the water, but there are additional steps you can take at home.

What You Can Do

Have your water tested

Contact your water provider to see if it has home testing options available. If not, it can help you find a certified laboratory to test your water. Tests typically run between 15 and 50 dollars.



Find out if you have a lead service line

Your utility may or may not know if you have a lead service line. If not, you can find out yourself or with the help of a licensed plumber. Service lines typically enter the home in the basement or crawl space. If the pipe is lead, it will have a dull finish that shines brightly when scratched with a key or coin. Using a magnet can also help you identify a lead pipe, because even a strong magnet will not cling to lead.

Have your plumbing inspected

A licensed plumber can inspect both your service line and other materials in contact with your drinking water. Lead solders, pipe fittings and brass fixtures can be potential problems.

Protect Your Household

There are steps you can take right away to reduce the possibility of lead in your water:

■ Run the Tap Before Use

Lead levels are likely at their highest when water has been sitting in the pipe for several hours. Clear this water from your pipes

by running the cold water for several minutes—which allows you to draw fresh water from the main. Your water provider or plumber can help you assess the right length of time.



■ **Clean Aerators**—Aerators are small attachments at the tips of faucets which regulate the flow of water. They can accumulate small particles of lead in their screens. It's a good idea to remove your aerators at least monthly and clean them out.



■ **Use Cold Water-**

Begin with cold water for drinking, cooking or preparing baby formula, because hot water dissolves lead more quickly.

■ **Filter the Water-**Many home water filters are effective at removing lead. If you purchase a filter, make sure it is certified for lead removal and that you maintain it properly. Find out more on filter certification at www.nsf.org.



For More Information

There are a number of resources available for more information about lead, water filtration systems and other related issues.

CDC-Lead in Drinking Water-The U.S. Centers for Disease Control and Prevention has information on lead's health effects and tips for protection from water and other common sources of exposure. www.cdc.gov/nceh/lead

Drinktap.org-A public service of the American Water Works Association, drinktap.org was created to provide people information about a variety of water-related issues, from water quality to conservation.

Epa.gov/lead-The federal agency responsible for the safety of America's drinking water, EPA hosts a comprehensive website that addresses all sources of lead in the home.

Nsf.org-NSF International provides consumer information about water filter capabilities, including claims to reduce lead. The NSF can also be reached at 800.NSF.8010.



**American Water Works
Association**

Dedicated to the World's Most Important Resource®

4858/2016

Lead

Keep Your Water Safe

Test Your Water
Check Pipes and Plumbing
Protect Your Family
Get the Lead Out!



**American Water Works
Association**



Let's Get the Lead Out!

The surest way to protect against lead in water is to get the lead out altogether.

■ **Replace lead service lines**

If you have a lead service line, talk to a licensed plumber about getting it replaced. Contact your utility to see if there are payment options or rebate programs.

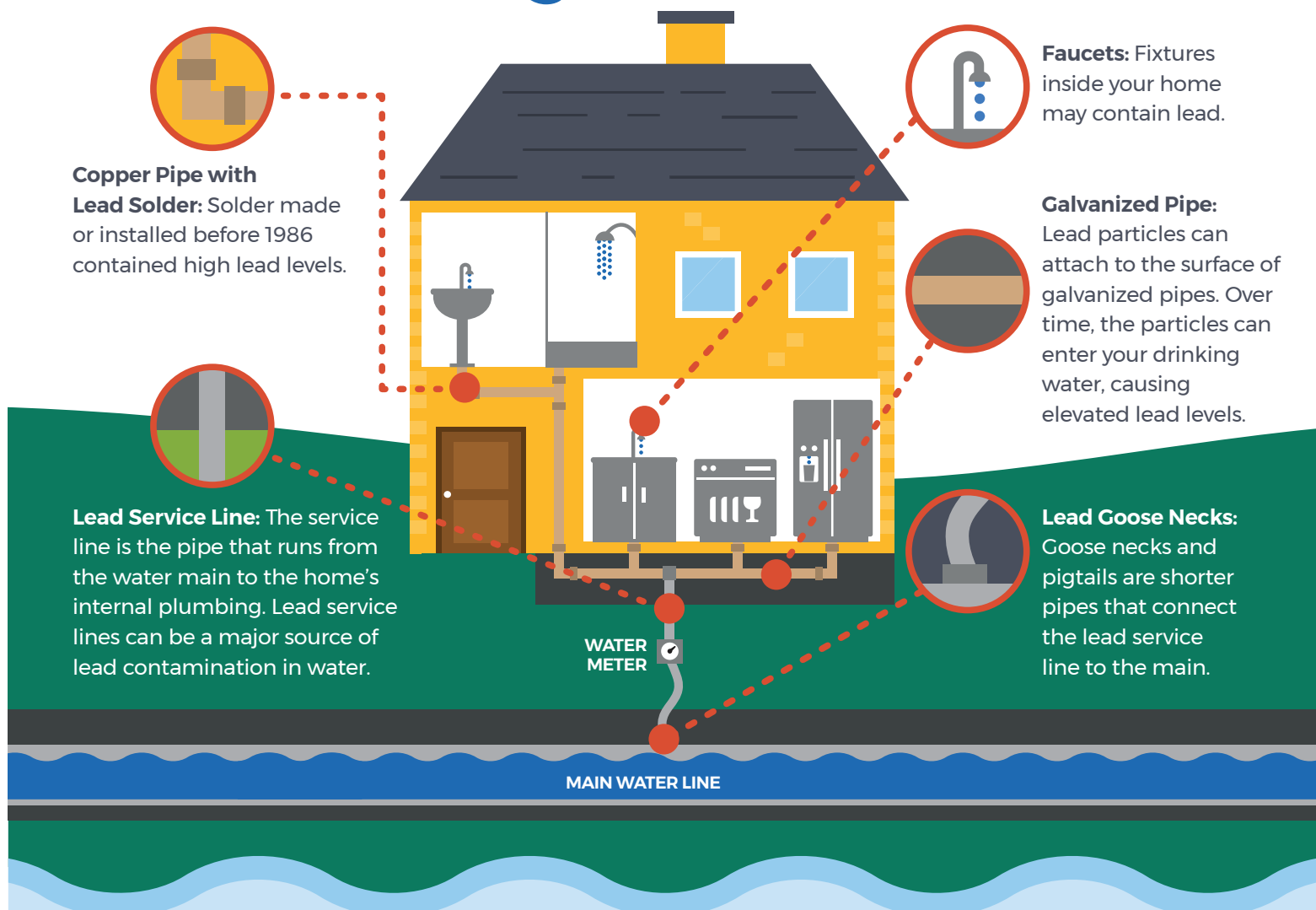
■ **Replace other plumbing that contains lead**

Hire a licensed plumber to look for and replace lead solder, fixtures or other potential sources of lead.



CONCERNED ABOUT LEAD IN YOUR DRINKING WATER?

Sources of **LEAD** in Drinking Water



Reduce Your Exposure To Lead



Use only cold water for drinking, cooking and making baby formula. *Boiling water does not remove lead from water.*



Regularly clean your faucet's screen (also known as an aerator).



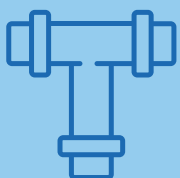
Consider using a water filter certified to remove lead and know when it's time to replace the filter.



Before drinking, flush your pipes by running your tap, taking a shower, doing laundry or a load of dishes.

To find out for certain if you have lead in drinking water, **have your water tested.**

Replace Your Lead Service Line



Water systems are required to replace lead service lines if a water system cannot meet EPA's Lead Action Level through optimized corrosion control treatment.

Replacement of the lead service line is often the responsibility of both the utility and homeowner.

Homeowners can contact their water system to learn about how to remove the lead service line.

Identify Other Lead Sources In Your Home

Lead in homes can also come from sources other than water. If you live in a home built before 1978, you may want to have your paint tested for lead. **Consider contacting your doctor to have your children tested if you are concerned about lead exposure.**



For more information, visit: [epa.gov/safewater](https://www.epa.gov/safewater)

Appendix B

Identifying Service Line Material

Identifying the material of a service line can be challenging: local plumbing codes vary and different pipe material and fittings were used during different decades. The materials available today were not necessarily available decades ago.



Lead pipe at curbstop. Source: Philadelphia Water

One approach to identifying the material is to physically inspect the piping. Service line pipes may be exposed where the pipe enters the home through a basement wall or floor, at the water meter, or when discovered through excavating the dirt over the service line or where connected to the water main. Water lines are typically 12 inches below the depth soil freezes in a community, meaning that service lines are often three and half feet or more underground and much deeper in northern climates. Consequently, our knowledge of service line materials is only as good as the installation records, subsequent recorded repairs, and inspection of those parts of the service line that can be readily accessed.

While lead is visibly different from other metals routinely used for water pipes, test kits approved by EPA to test for lead paint can be used to test for lead on the surface of service lines. Information on lead testing resources are available at:

- [Occupational Safety and Health Administration: Lead Test Kits](#)
- [National Center for Healthy Housing: Lead Testing Kits](#)

If a pipe is painted, the lead kit will respond to the lead in paint. Be sure to confirm false negative test results using the "Test Confirmation Card" contained in the test kit.

Visual scratch testing

Lead is a dull gray color and very soft. If scraped with a key it will turn a bright silver color. Even a very strong magnet will not stick to lead.

Types of water pipes Follow the guidance below or contact a licensed plumber to determine the material of your water pipes. To identify the material of your service pipe material on private property, check your household water service connection, typically located in the basement. Homeowners should identify and replace old household pipes, particularly galvanized plumbing and sources of lead. The type of household plumbing can vary throughout your household.	Lead  A dull, silver-gray color that is easily scratched with a coin. Use a magnet - strong magnets will <i>not</i> cling to lead pipes. Galvanized  A dull, silver-gray color. Use a magnet - strong magnets <i>will</i> typically cling to galvanized pipes. Copper  The color of a copper penny. Plastic  White, rigid pipe that is joined to water supply piping with a clamp.
--	--

DC Water: Understanding Your Water Service Pipe

More information concerning testing and identifying service line material is available at the following links:

- [EPA: Advice to Chicago Residents about Lead in Drinking Water](#)
- [DC Water: Guide to Identifying Household Plumbing](#)
- [Cincinnati Water: Visual Scratch Test \(video\)](#)

Appendix C

IRREVOCABLE TEMPORARY LICENSE
&
PROPERTY OWNER AGREEMENT

This IRREVOCABLE TEMPORARY LICENSE (the "License") is made the ____ day of _____, 20__ by and between [NAME AND ADDRESS OF ALL RECORD OWNERS] XXXXXXXXXXXX County, PA, sometimes hereinafter referred to as "Licensor" and AMBLER BOROUGH, a municipal corporation, of 131 Rosemary Avenue, Ambler, Pennsylvania, 19002, sometimes hereinafter referred to as "Borough" or "Licensee" (together, "Parties").

Background

Licensor is the owner of real estate located at [ADDRESS] more particularly described in the deed recorded at XXXXXXXX in the Office of Recorder of Deeds of Montgomery County, Pennsylvania ("Subject Property");

Licensor receives water from the water supply of the Borough through private water service lines which are owned and maintained entirely by Licensor beginning at the curb stop through the exterior of the primary structure on the Subject Property;

Upon information received, said private water service lines are comprised in whole or in part of lead;

Pursuant to its Lead Service Line Replacement Plan ("LSLR Plan"), approved by the Pennsylvania Public Utility Commission ("Commission"), the Borough is permitted to cover the cost of replacing those water service lines of the Borough made of lead, including the entire length of the private water service line, which is exterior to the primary structure on the Subject Property and, to the extent necessary, through the foundation wall of the Subject Property (the "Lead Service Line Replacement Project");

Subject to the terms and conditions of the Borough's Water Tariff and the Commission-approved LSLR Plan, the Borough is willing to replace the exterior privately-owned lead water service line at the Subject Property provided Licensor agrees to the terms and conditions of this License;

Licensor recognizes the benefits to be realized from allowing the Borough, as Licensee, to replace the exterior privately-owned lead water service line on the terms and conditions hereinafter set forth; and

Licensor, on behalf of Licensor and/or the heirs, executors, administrators, successors and assigns of Licensor, recognizes and represents that Licensee will be expending money in reliance upon the representations made herein by Licensor for the purpose of replacing said lead water service lines and, for that reason, that this License shall be irrevocable for the duration of the License.

NOW, THEREFORE, in consideration of the mutual representations and promises made by Licensors and Licensee herein, and intending to be legally bound hereby, the Parties agree as follows:

1. The Background section above is incorporated herein by reference as if the same were set forth here at length.

2. Subject to the terms of this License, Licensors, on behalf of Licensors and/or the heirs, executors, administrators, successors and assigns of Licensors, hereby gives permission to Borough and its agents, employees, and contractors (hereafter collectively referred to as "Licensee") as Licensee to enter upon, excavate, remove and replace the lead water service line found within the Subject Property through the point of connection with the on-site meter; and to restore the site to a properly-graded condition, as well as inspect and perform ameliorative measures during such activities, and for the period set forth in Section 3 of this License, as the Borough, in its sound and sole discretion, may deem reasonably necessary for purposes of ensuring the completion of the work in compliance with all laws, regulations and sound work practices as deemed appropriate by the Borough for the continuation of water service to the primary structure at the Subject Property. Notwithstanding any provision to the contrary, Licensee shall have no obligation to move or return any equipment, furniture, fixtures, sheds or other fixed or temporary structures or other personal property or remove and/or re-erect any fencing, trees, bushes or other plantings at the Subject Property; provided, however, following replacement of the exterior lead water service line found within the Subject Property, Licensee shall promptly repair the Subject Property to as near as its pre-existing condition as practicable insofar as grade and condition of the ground, including the re-seeding of grass.

3. The term of the license granted hereunder shall commence upon execution of this License by the Borough and shall continue for a period of two (2) years after water service is initially restored at the Subject Property ("Completion Date").

4. As a condition of being authorized by this License, contractors designated by Borough to perform the work shall be required to furnish a certificate of insurance acceptable to the Borough evidencing the existence of in force insurance policies, which shall remain in force throughout the work, from carriers authorized and licensed to do business in the Commonwealth of Pennsylvania, evidencing the following minimum coverages:

- a. CGL Coverage: Comprehensive general liability (CGL) insurance with coverage limits no less than \$1,000,000 per occurrence and \$2,000,000 in the aggregate against damages claims for bodily injury, including wrongful death, property damage, and consequential damages, which are caused by or arise from any work or operations performed by the general contractor.
- b. Motor Vehicle Coverage: Motor vehicle liability insurance in the amount no less than \$1,000,000 combined single limit for bodily injury and property damage caused by or arising from the ownership, possession, operation, maintenance or use of owned and non-owned motor vehicles.

5. The Parties specifically agree that the new private water service line on the Subject Property shall become the sole property of Licensor immediately upon installation and restoration of water service at the property, pursuant to the Water Department Tariff. The Borough-owned portion of the water service line will remain the property of the Borough.

6. No waiver, verbal or otherwise, of the terms and conditions of this License on one or more occasion shall be deemed to be a permanent waiver of such terms and conditions.

7. Licensee in no way assumes responsibility for liabilities which may arise or occur as a result of the issuance, existence, or termination of this License or the work itself, excepting those liabilities for which all of the following are true and correct: (i) the claim or liability is directly attributable to the work authorized by this License; (ii) the claim or liability arises during the work and/or the two (2) year period after water service is initially restored at the Subject Property; and (iii) the property owner reports the condition upon which the claim or liability is based to the Borough within forty-eight (48) hours of becoming aware of such condition.

8. Licensor may not assign Licensor's interest hereunder without the written consent of Borough.

9. This License may not be amended or modified except by a further agreement, in writing, duly executed by the parties hereto.

10. This License shall be governed by and construed in accordance with the laws of the Commonwealth of Pennsylvania.

11. This License shall run with the land and be binding upon, and inure to the benefit to, the heirs, executors, administrators, successors and assigns of the parties hereto, including subsequent owners of the Subject Property.

12. In the event Licensor conveys any right, title or interest in the Subject Property within two (2) years after water service is initially restored at the Subject Property, Licensor shall disclose the existence of this License to the intended recipient of such right, title or interest.

13. In the event Licensor and/or Licensor's heirs, executors, administrators, successors and assigns assert claims not authorized by Paragraph 7 or Licensor fails to comply with Licensor's obligations in Paragraph 12, then Licensor and the heirs, executors, administrators, successors and assigns of Licensor agree to indemnify and hold harmless Licensee from and against any action, claim, court costs, damages, demands, expense, liability, loss, penalty, proceeding or suit, including reasonable attorneys' fees, costs and disbursements (collectively "Claims") arising from or relating to injury to person or property, including death, as a result of any act or omission (whether intentional, negligent or otherwise) actually or ostensibly attributable to the work. The terms of this paragraph shall survive in perpetuity notwithstanding the expiration of the term of this License.

14. Should any section or provision of this License be declared by a court of competent jurisdiction to be invalid or unenforceable, such decision shall not affect the validity or enforceability of the remainder of this License as a whole, or any part hereof.

15. Nothing in this License shall be deemed to alter or compromise the right, power or privilege of the Borough to enforce any and all laws, ordinances, rules and regulations as the Borough, in its sole discretion, may deem appropriate.

[SIGNATURES TO FOLLOWING ON NEXT PAGE]

*Signature Page to Irrevocable Temporary License
For Lead Service Line Replacement Project*

IN WITNESS WHEREOF, Licensor has issued this license, intending to be legally bound hereby, as of the day, month and year first mentioned above.

WITNESS:

LICENSOR:

By: _____

ATTEST:

LICENSEE:

AMBLER BOROUGH WATER DEPARTMENT

[NAME]
[TITLE]

By: _____

[NAME]
[TITLE]

Appendix D

Lead Service Line Replacement Completion Form

PROPERTY OWNER:

PROPERTY ADDRESS:

PROJECT COMPLETION DATE:

This Lead Service Line Removal Completion Form is made by and between the Ambler Borough Water Department (“Water Department” or “Borough”) and the above-named property owner (“Property Owner”) to document that the removal of the customer-owned lead service line by the Water Department has been completed.

Now, therefore, the Property Owner and the Water Department hereby agree in and to the following:

1. The Water Department has replaced the lead service line at the address above as part of Ambler Borough Water Department’s Lead Service Line Replacement Program.
2. The work to replace the lead service line was completed on the Project Completion Date listed above.
3. The Water Department has removed the lead service at the address above in a manner and within the time frame that was agreed to in an executed agreement between the Property Owner and the Borough, dated _____.
4. The Water Department has backfilled any trenches excavated as part of the replacement process and has filled and sealed any wall or floor penetrations in the private home. If applicable, the Water Department has also graded and re-seeded backfilled trenches. The Water Department has no maintenance responsibility with respect to the restored property.

Property Owner Signature and Date:

Ambler Borough Water Department Signature and Date:

Appendix E

Lead Service Line Replacement Routine Procedure

1. Ambler Borough Water Department or its service line replacement contractors will notify you when excavations and replacements will be occurring at your property. Because the contractors need to access your home as part of this process, someone who is at least 18 years old must be home while the pipe replacement is taking place.
2. As part of this service line excavation & replacement, you may request that your water be tested after the service line is replaced. Water testing is by request only. Residents will have to provide separate permission for water testing to be done.
3. During the line replacement process, your water will be shut off for a period of 4 to 8 hours. The contractor will make every effort to have your water restored the same day that installation begins. Please maintain a clear path to the water meter and clear material away from the water meter so work crews can run the replacement pipe to it.
4. The contractor will flush the water in your home for 15 minutes after the pipe is replaced to remove any residue or sediment from the water line. You should flush your pipes a second time for at least 15 minutes at the highest flow rate once the contractor has left. You will be provided with a water filter and/or replacement cartridges, if you do not already have them. **Please continue to use your water filters for at least 6 months after service line replacement.**
5. The Water Department will restore roadways and public sidewalks; backfill, grade, and reseed 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 Water Department will not replace any landscaping, interior finishes, paving, or walkways. All restoration costs shall be borne by the customer or property owner, if the customer is not the property owner.

Appendix F

Ambler Borough Water Department
Water Customer

Re: Lead Service Line Replacement Project

Dear Water Customer or Property Owner:

As part of a nationwide effort to remove all lead piping from drinking water systems, the Ambler Borough Water Department (“Borough” or “Water Department”) will begin replacing lead service lines in your neighborhood on or around [DATE OR DATE RANGE]. A Water Department employee or contractor will be on your street excavating water service lines at the curb stop to determine if your property is served by a lead service line or a galvanized line downstream of a lead service. If the employee or contractor finds lead and galvanized piping, the Water Department will begin planning to replace it with new copper or plastic pipe. This work may involve replacing both the public side (street side) and property owner side of the curb stop.

During the work, a Water Department employee or contractor representative will contact you directly to inform you as to whether or not you have a lead or galvanized service line. Replacement of the service line on private property can only occur with the property owner’s written permission. A license agreement will be presented to the property owner for signature in order to allow work to be done on private property.

The Water Department strongly encourages all property owners to allow this work to proceed so all lead lines can be removed from the drinking water system. Also, in accordance with Pennsylvania Department of Environmental Protection (“PADEP”) requirements, a preliminary water sample will be taken prior to pipe replacement to measure lead levels in the drinking water. Historically, lead in Water Department drinking water has consistently been below action levels established by PADEP.

Replacement of lead service lines under this project (both private and public side) will be at the Water Department’s expense unless you deny access to your property. If you have a lead service line and do not grant permission to the Water Department to the private side lead or galvanized pipe, and it needs to be replaced at some future date, the cost and responsibility to replace it will fall on the property owner. However, you may be eligible for reimbursement of the cost to replace in accordance with Borough policy, within applicable time frames. This project will not include replacement of any lead-containing fixtures or plumbing downstream of the water meter in your home.

Should you have any questions or concerns, or if you would like to schedule a Water Department representative to inspect the water line where it enters your home at the water meter, please contact the Water Department at [CONTACT INFO].

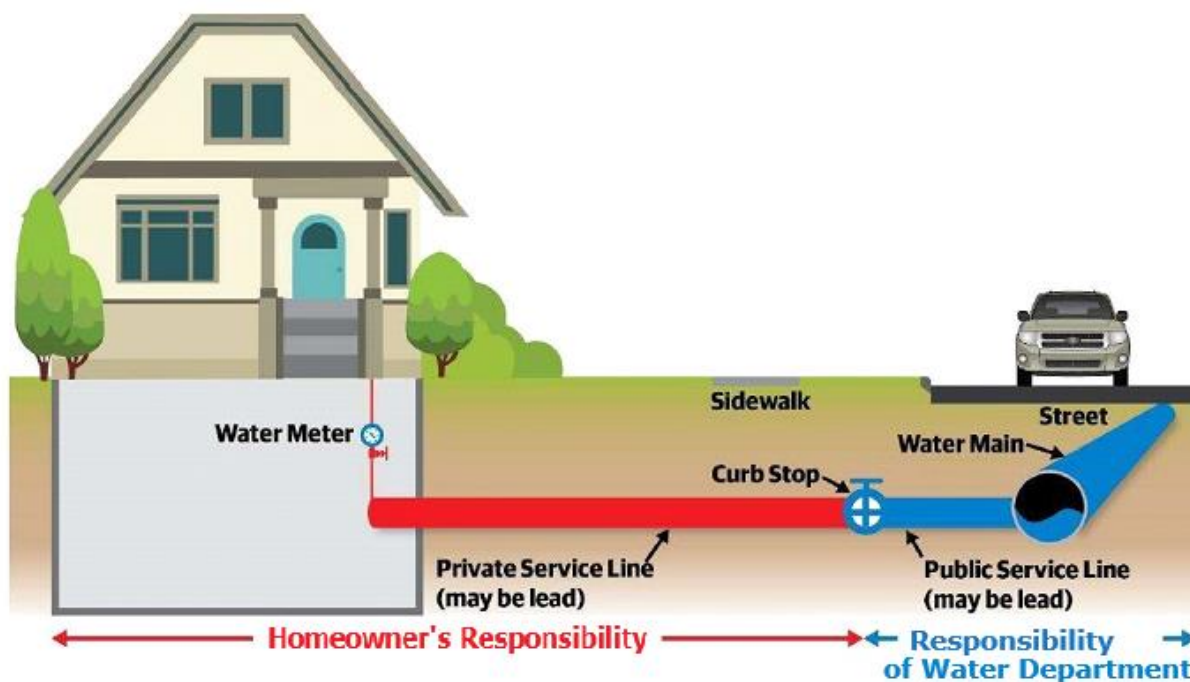
Thank You

Enclosure: FAQ Sheet

FAQ Sheet

Q: What is a water service line?

A: The water service line connects the water main in the street to your house. The Water Department owns and maintains the line from the water main to the curb stop, usually located between the curb and sidewalk. Customers are responsible for the private side service line from the curb stop to their house; however, the Water Department will replace the private side line under this project.



Q: What homes typically have lead service lines?

A: Lead was commonly used as a material for service lines in the 1920s and 1930s. If your home is this old, and you have no record of having your service line replaced, it may have a lead service.

Q: How do I know if I have a lead service line?

A: Service lines in the Borough can be copper, galvanized steel, plastic, or lead. Use a magnet or coin to determine the type of pipe material you have.

1. Locate the water meter in your basement or lowest level of your home. Look at the pipe that comes through the outside wall and connects to the water meter.
2. If the magnet sticks to the pipe, it is galvanized steel.
3. Gently scratch the pipe surface with a coin. If the pipe is shiny, silver in color, and the magnet does not stick, the pipe is made of lead.
4. If the pipe is copper or bronze in color and the magnet does not stick, the pipe is copper.
5. If the pipe is white, gray, or flexible tubing, and is joined with a clamp, screws, or glue, the pipe is plastic.

If you have a lead service in your home, contact the Water Department to be added to the replacement list. The pipe buried in your yard may be different from the material inside your home. The Water Department or its contractor will excavate at the curb stop to determine the buried pipe material.

Q: Why do I need to sign a license agreement?

A: The agreement grants the Water Department access to your property to replace the lead service line. The agreement will include insurance requirements for the contractor performing work on private property. The agreement defines the level of restoration following service line replacement.

Q: Will I own the newly installed private side service line?

A: Yes, you will assume ownership of the new private side service immediately after installation.

Q: Will my property be restored?

A: Disturbed areas of your yard will be graded and seeded and sidewalks repaired. The Water Department and/or its contractor will have no obligation to move or restore other fixed or temporary structures, replant trees, shrubs, other plantings, or repair fencing.

Q: Will someone have to enter my home?

A: Yes, if the contractor or Water Department confirms that a lead service line enters the home, the Water Department will schedule a time to inspect your internal piping connections and make repairs as needed. Someone 18 years or older must be home the entire time this activity takes place.

Q: Will this cost me anything?

A: The work is being done at the expense of the Water Department. The homeowner will be responsible for any landscaping improvements beyond grading and seeding.

Q: When will the work occur?

A: The Borough intends to begin work [DATE RANGE] and continue to the [DATE RANGE]. A schedule for your street has not been developed yet. Depending on the amount of work involved, the project may extend into [DATE RANGE].

Q: How long will the work take?

A: We estimate 4 to 8 to hours for replacement of the service line including indoor connections unless unforeseen issues occur. Your water service will be interrupted during this time. In all cases, water will be restored by the end of the work day.

Q: What if I refuse to sign the license agreement?

A: The Water Department will not replace the public or private side service line. Once the Water Department or contractor finishes in your neighborhood, you will then be responsible for the future replacement of the private side service line at your expense.

Q: Will I need to flush my plumbing following service line replacement?

A: Yes, the Borough will provide flushing instructions and a water filter to affected homeowners at the time of service line replacement.

Q: Can I have my water tested for lead?

A: Yes, you can have your water tested anytime. Contact the Water Department at [CONTACT INFORMATION]

Appendix G

Lead Service Line Replacement Pitcher Filter

Ambler Borough Water Department has recently removed lead from your service line. It is recommended to use a Brita pitcher filter for the next 6 months for drinking water and cooking purposes. We are providing one free of charge to you but are having trouble getting in contact with you. Please either pick your pitcher filter up at our main office, 131 Rosemary Avenue, Ambler, PA 19002, or call us at 215-646-1000 x124 to schedule to have someone deliver a pitcher to you.

Appendix H

FLUSH YOUR WATER PIPES AFTER WATER SERVICE IS RESTORED

THIS REPORT CONTAINS IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER. After your lead service line is replaced, the Ambler Borough Water Department recommends flushing your water taps after service is restored to reduce the risk of lead in your drinking water. Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems. You may experience a temporary increase of lead levels in your drinking water due to the replacement. DO NOT consume tap water, use your ice maker or filtered water dispenser, or open hot water faucets until you have flushed your water lines following the steps below.

Find all faucets that will drain on all floors of your home, including the basement. Include laundry tubs, hose bibs, bathtubs, and showers as flushing points. Remove aerators and screens where possible, including shower heads, from all faucets you plan to flush.

After all aerators are off, open the cold faucets in the basement or lowest floor of the house first. Leave all faucets running at the highest rate possible and using only cold water. Continue opening faucets on the next floor up until all faucets are open on all floors. Leave the water running for at least 30 minutes.

After at least 30 minutes, turn off the first faucet you opened and continue turn off other faucets in the same order you turned them on. Clean aerators and screens before nutting them back on the faucets.

For six months after replacement, perform daily mini flushes each morning or when water sits in the pipes for more than 6 hours. Turn on your kitchen faucet until the water is cold and continue to flush for 3 to 5 minutes in order to get fresh water from the water main. Clean debris from aerators and screens once a month for six months. For six months after replacement, filter drinking water using the provided Brita filter pitcher. Follow Brita's directions on pitcher use and maintenance.

Appendix I

Lead Service Line Replacement Cost

Address of Replacement: _____

Date of Replacement: _____

Person filling out this form: _____

Was the LSLR Information form given to all consumers?: Y / N

Was LSLR Information form provided to the property owner?: Y / N

Was a pitcher filter provided to all consumers in the building?: Y / N

Does the customer(s) want a follow-up sample?: Y / N

If so, what is the date(s) for follow-up sampling?: _____

What is the length of lead removed?: _____

What is the new pipe material?: _____

What is the diameter of the new service line?: _____

What is the length of the new service line?: _____

What is the cost of the new service line?: Cost: _____

Was a new curb stop installed?: Y / N Cost: _____

Was a new corp installed?: Y / N Cost: _____

Was a new curb box installed?: Y / N Cost: _____

Was a new rod installed?: Y / N Cost: _____

Additional materials needed?: Cost: _____

Estimated labor: Cost: _____

Estimated equipment: Cost: _____

Restoration: Cost: _____

Total estimated cost of LSLR: Cost: _____

Appendix J

Lead Service Line Replacement Reimbursement Form

Eligible customers seeking reimbursement for their lead service line replacement need to complete this form, include the documentation requested in the checklist below, and either e-mail, fax, or hand deliver a copy of the documents to Ambler Borough Water Department.

Complete this Checklist

1. Proof of lead service line - a combination of the following:
A photograph of the service line
Verified statement from contractor
Borough of Ambler documentation
2. Copy of paid invoice confirming replacement of the lead service line with a copper service line.
3. Detailed estimate of work from the contractor for replacement of the lead service line with a copper service line.

E-mail, fax, or hand deliver a copy of this document and accompanying documents to Ambler Borough Water Department.

Email Address: manager@borough.ambler.pa.us.

Fax Number: 215-641-1921

Street Address: 131 Rosemary Avenue, Ambler, PA 19002

CUSTOMER ACCOUNT INFORMATION	PLUMBER/CONTRACTOR INFORMATION
1. Address	1. Business Name
2. Water Account No.	2. Business Address
3. Name	3. Contact Person
4. Phone No.	4. Phone No.
5. Email	5. Email

REPLACEMENT DETAILS
1. Date of the replacement: 2. Length of warranty: 3. Description of plumbing improvements made: 4. Description of restoration work completed: 5. Any other unusual conditions that increased project costs? I hereby certify that all information in this document is true and accurate to the best of my knowledge. Signature:
Date:

Appendix K

[Date]

Ambler Borough Water Department
Water Customer

Re: Lead Service Line Replacement (“LSLR”) Project – Refusal to Replace Private Service Line

Dear Water Customer/Property Owner:

Your property has been identified as having the following water service line material:

Address: _____

Date: _____

Public (street) side of curb stop: Lead Galvanized Steel

Private (homeowner) side of curb stop: Lead Galvanized Steel

As part of the Water Department’s Lead Service Line Replacement Plan, the Water Department will replace all lead or combination of lead and galvanized steel on both sides of the curb stop. **This project will be undertaken at the Water Department’s expense; however, the Water Department requires your permission to replace the private side portion of the service line from the curb stop to the water meter in your house.**

We encourage you to sign the “Irrevocable Temporary License” document to allow the Water Department’s employees or authorized contractor to replace the service line on your property.

Should you refuse to allow replacement of your private-side service line, please read the following and sign/date below.

- a) Replacement of the private-side service line at the Water Department’s expense is a one-time offer which is available only for a limited time.
- b) You will have one (1) year from the date this form is signed to replace your private side service line and be eligible for reimbursement by the Water Department, subject to the terms and limitations provided in the Water Department’s LSLR Plan and Tariff.
- c) Any further refusal to replace your private side service line may result in termination of water service.

I have read and understand the risks in denying permission to replace my private service line at this time.

Property Owner Signature _____ Date _____

Print Name _____

Exhibit 2



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SAFE DRINKING WATER

SERVICE LINE INVENTORY FORM

What is the purpose of this template?
The purpose of this template is to help water systems comply with the Service Line Inventory requirements of the January 15, 2021 Lead and Copper Rule Revisions (LCRR). This template provides fillable forms and tables that water systems can use to document their methods, organize their inventory, submit the initial inventory and inventory updates to the state, and document how they are making the inventory publicly available. Note that DEP does **NOT** require systems use this template for their inventory, but it is recommended. Refer to the worksheet "Reg Q&A" and EPA's 2022 Inventory Guidance for the regulated minimum inventory requirements and recommendations.

How is the template organized?
This workbook contains several worksheets, which are accessed by clicking the tabs at the bottom of the workbook window. They appear like this:

Introduction	Instructions	Class & Tier Info	Reg Q&A	General Information	Inventory Methods	Detailed Inventory	Summary Information
--------------	--------------	-------------------	---------	---------------------	-------------------	--------------------	---------------------

The worksheets and cells in this template are color coded:
 – Yellow sheets are instructions and background, blue sheets are templates for water systems.
 – Gray shaded cells are background or instructions. Light blue cells are for data entry by the water system and light green cells are for data entry by the state.
 See the table below for a description of each worksheet.

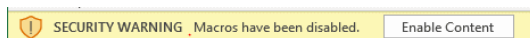
Information Relevant to this Template:

Template Organization		
Worksheet Type	Worksheet Name	Description
Background	Introduction	Introductory template information
	Instructions	Contains detailed instructions for systems and States.
	Class & Tier Info	Contains information on: - how service line classification is determined when ownership is split between the system & customer; - how LCRR tap sampling tiers are determined.
	Reg Q&A	Explains the regulatory service line inventory requirements of the January 15, 2021 LCRR in Q&A format.
Templates for Water Systems	General Information	For systems to document relevant information about their system.
	Inventory Methods	For systems to document the methods and resources they used to develop their service line inventory.
	Detailed Inventory	For systems to organize their detailed inventory. Each row equals one service line connecting the water main to the customer's plumbing. Separate columns track locational information, the system-owned portion, the customer-owned portion, other possible sources of lead, and information for assigning a tap sample tiering classification.
Summary	Summary Information	This sheet automatically generates totals based on information in the Detailed Inventory worksheet.

Template Use - General Steps

Open the spreadsheet. If you have a large amount of data it may take a few minutes. Please be patient.

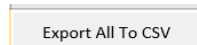
- This template will work with a Windows based PC and Excel 2013 or newer.
- This spreadsheet may not support use by Mac PCs.
- If you see this message, click on Enable Content before you begin:



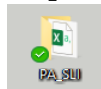
- If you do not see this message, and the macros do not work, contact ra-padwis@pa.gov for assistance.

Fill out the spreadsheet. Detailed instructions are provided on the Instructions tab.

Create export. Once the inventory is final, use the "Export All To CSV" button to create the export files. **DO NOT OPEN THE EXPORTED CSV FILES.**



- A folder called "PA_SLI" will be created on your desktop and the export files will be placed inside the folder:



- In addition, a hyperlink will be inserted into the spreadsheet which will link directly to the created folder:

Export Location:

[C:\Users\JohnDoe\OneDrive\Desktop\PA_SLI](C:\Users\JohnDoe\OneDrive\Desktop\PA_SLI)

- Three export files will be created with "GenInfo", "InvMeth", and "Details" appended to the file name.
- Each export file name will be date stamped using YYMMDD format.
- The date stamp appears at the beginning of the file name so that the export files will automatically sort by date.

IMPORTANT NOTES about CSV files and spreadsheet. DO NOT OPEN THE CSV FILES.

- Each time CSV files are uploaded to DWELR, also save the SLI spreadsheet in the same folder. The spreadsheet should be saved with a unique name that includes the date (should match the date on the CSV file) and whether it is an Initial or Updated inventory.
- It is highly recommended to also save a backup copy of the CSV files and spreadsheet in another location to prevent accidental loss.



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DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SAFE DRINKING WATER

SERVICE LINE INVENTORY FORM

Getting Started

For best results READ and FOLLOW these instructions.

- Complete the **General Information** tab first. Some information entered on that tab carries through to the other tabs.
- Next complete the **Inventory Methods** and **Detailed Inventory** tabs. Your system totals will then appear in the **Summary Information** tab.
- The Detailed Inventory is entered **line by line**:
 - Information is initially typed into Row 7.
 - When the row is complete, click on the "Add To Inventory" button at the far right (column AM).
 - The values will be transferred to the list below. **Values in the list cannot be edited directly.**
 - To edit previously entered service line information, re-enter the Unique Service Line ID in Row 7, Column E. This will call up the previously entered information for that service line, which can then be edited and re-entered.
 - Each line entry will be date & time stamped in Column AN. Entries will be in order from newest to oldest.
 - If the spreadsheet gets "stuck" (can't enter data), click on the "Clear Top Row" button at the top of the page.
 - If the spreadsheet gets "stuck" after clicking Add to Inventory, look for a pop up window hidden behind the spreadsheet.
- After all tabs have been completed, export the information to csv files, following the steps on the Introduction tab under the section Template Use.

Add To Inventory

Clear Top Row

General Template Instructions:

- The display size of the spreadsheet may be adjusted using the slider bar at the bottom right.
- All <LIGHT BLUE> fields should be completed.
- Failure to complete all required fields could result in mis-classification of service lines.
- Many boxes have dropdown menus. Click on the cell, then click on the arrow that appears to the right of the cell. The dropdown menu can also be accessed by using Alt-Down Arrow on the keyboard. Select a response from the list that appears. If an answer is not applicable, leave the dropdown response set to the default value (first item in list).
- Filtering has been enabled to allow the user to easily search for occurrences of certain text values or cell colors. Each column heading in Row 9 has an arrow at the bottom right. Click on the arrow to access the filter options.
 - Filtering can be used to easily find, for example, responses that require information to be entered into the Additional Comments field.
- If a selection from a dropdown menu causes the cell color to change to light brown, additional information needs to be entered in the Additional Comments field.
- If a cell or set of cells is XX'd out, those questions should not be answered.
- Where more detailed instructions are necessary, links have been provided from the form to this instruction page. Links are shown in blue underlined text. There are also links to return to the original form.

Click the following links for specific Instructions:

[Initial Inventory](#)
[First Inventory Update](#)
[Inventory Updates after First Update](#)
[General Information Tab](#)
[Detailed Inventory Tab - State Determined Values](#)
[Detailed Inventory Tab - Locational Information](#)
[Detailed Inventory Tab - System-Owned Portion](#)
[Detailed Inventory Tab - Customer Owned Portion](#)
[Detailed Inventory Tab - Tap Sampling Information](#)
[Summary Information Tab](#)

Initial Inventory

[Return to Top](#)

1. On the General Information tab select "Yes" for "Initial Inventory?" and enter the date the initial inventory was completed.
2. On the Detailed Inventory tab, column F "Record Type" must remain as "Initial" for each service line being entered.
3. Proceed using Detailed Instructions by Tab below.
4. After all information is entered, export the csv files and save the spreadsheet.



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SERVICE LINE INVENTORY FORM

First Inventory Update [Return to Top](#)

1. Start with the most recent version of the Inventory.
2. On the General Information tab select "Yes" for "Updated Inventory?" and enter the date of the update.
 - Always retain the Initial Inventory date!
 - Enter or edit the information that is being updated.
3. On the Inventory Methods & Detailed Inventory tabs, answer the question "Are there any updates on this page?"
4. On the Detailed Inventory tab, in Column F "Record Type", select Update, Add or Inactive from the dropdown box for each line being updated.
 - If the record is being updated because the service line was replaced, enter the Date Replacement Completed in Column G.
 - Note: The Unique ID must match an existing ID unless the Record Type is Add.
5. After making updates, export the csv filed and save the spreadsheet with a new file name. Retain a copy of each revision of the spreadsheet submitted to PA DEP.

Inventory Updates after First Update [Return to Top](#)

1. Start with the most recent version of the Inventory
2. On the General Information tab select "Yes" for "Updated Inventory?" and enter the date of the update
 - Always retain the Initial Inventory date!
 - Enter or overwrite the information that is being updated
3. On the Inventory Methods tab, answer the question "Are there any updates on this page?"
4. On the Detailed Inventory tab, use the filter (Row 8) on the Record Type column (Column F) to select all of the records that were updated in the previous inventory (types Update, Add, Inactive).
 - Change each previously updated Record Type to Retain.
 - Continue with Inventory Updates as described under First Inventory Update

General Information Tab [Return to Top](#)

Select "Yes" or "No" in response to the questions about Initial and Updated Inventory

- The Inventory type must be EITHER Initial or Updated. Do not select "Yes" for both of the questions.
- Enter the Initial Inventory date
- If this is an Updated Inventory, also enter the Updated Inventory date

Total Population Served: The number of residential customers; plus the average of the number of regular consumers served, per day, during a month; plus the average of the number of transient consumers served, per day, during a month.

Number of Service Connections: This field will auto-populate based on the number of entries in the Detailed Inventory.

PWS Type: Select either CWS or NTNCWS. All CWS and NTNCWS are required to submit a Service Line Inventory.

Question 1: If the PWS Type is CWS, this question must be answered "Yes" or "No". If the PWS type is NTNCWS, select "Not Applicable".

Question 2: AFTER completing the Detailed Inventory, the total number of service lines will be listed above. Confirm that the number of service lines listed matches the number of service connections reported on the most recent annual Average Daily Water Use form submitted to DEP.

Question 3: Indicate if the system serves any Disadvantaged Communities and the approximate percentage of service lines that are connected to members of a Disadvantaged Community. "Disadvantaged Community" is as defined in the most recent PennVest Intended Use Plan, which is available on line. Systems that serve Disadvantaged Communities may be eligible for additional funding under the Bipartisan Infrastructure Law.

Detailed Inventory Tab - State Determined Values [Return to Top](#)

Unique Service line ID **MAY NOT BE CHANGED or DELETED** after submission to DEP. New unique service line IDs may be added during inventory updates. In limited instances, service line IDs may be inactivated.

Column A, Service Line Classification: Will be determined automatically for each unique service line ID based on the responses in the Detailed Inventory. If the assigned classification is different than anticipated please double check the responses entered in this form. Service line classifications for joint ownership are determined according to the Class & Tier Info tab of this spreadsheet

- If the designation is Galvanized Requiring Replacement, only the galvanized portion of the line needs to be replaced
- All determinations are subject to review and approval by Department staff

[Return to Form](#)



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SERVICE LINE INVENTORY FORM

Column B, Sufficient Evidence for Determination of Non-Lead? : Will be determined automatically based on responses. All determinations are subject to review and approval by Department staff. To provide sufficient evidence of the Non-Lead classification the system is expected to:

- Identify records that indicate Installation/replacement date after January 6, 1991 - OR -
- Conduct CCTV inspection inside service line over the full length - OR -
- Conduct mechanical excavation in at least 3 locations over the length of the service line* - OR -
- Combine any TWO other investigation techniques from the dropdown lists
- Note: for jointly owned service lines, both portions must meet the criteria for the service line to be classified as Non-Lead

[Return to Form](#)

* Refer to [Class & Tier Info tab](#) for more information

NOTE: If insufficient evidence-based techniques are indicated on the inventory form, this cell will turn RED

Column C, LCRR Sampling Tier: Suggested Tiering Level based on responses in the Detailed Inventory. This field is determined automatically. This field is provided as a convenience for the water system and is not binding. Tiering is determined according to the Class & Tier Info tab of this spreadsheet.

[Return to Form](#)

*For CWS, if the %MFRs is > 20%, a proportional number of MFRs may be assigned to Tier 1

Detailed Inventory Tab - Locational Information

[Return to Top](#)

Column E, Unique Service Line ID : The system-assigned unique ID for this service line (required field). The Unique ID:

- May contain up to 30 characters
- Can use letters and/or numbers in any combination
- Use only uppercase letters; lowercase letters will be converted to uppercase
- Can use hyphen (-), underscore (_), period(.)
- May not use spaces, commas or other special characters (i.e., *, !, @, etc.)

[Return to Form](#)

NOTE: If a duplicate ID or address is entered the boxes will turn RED

Column F, Record Type

- Initial – Use this designation for the initial inventory submitted on or before October 16, 2024
- Update – Use this designation when submitting an updated inventory, to indicate the record is being revised
 - If the update is due to a service line replacement, enter the replacement date in Column G
- Add – Use this designation to add more service lines to an existing inventory
- Inactive – Use this designation to indicate a record is being inactivated. Records cannot be deleted.
 - Example: Property was made into a parking lot and the service line was decommissioned.
 - Add a text comment explaining the reason for inactivation in columns Y and/or AH.

[Return to Form](#)

Column G, Date Replacement Completed: If the SL has been replaced since the initial inventory (or last inventory update), enter the replacement date here. Also change the Record Type in Column F to "Update". Remember to revise the Material Type and other information affected by the replacement for both the system and customer portions of the line.

[Return to Form](#)

Column H, Ownership Type: Indicate whether the service line is owned, in its entirety, by the System, the Customer, or Jointly.

IMPORTANT: If the Ownership Type selected is System, any answers entered in the Customer-Owned columns will be grayed out, and vice versa.

→ Be careful when selecting Ownership Type as this affects the determination of the Service Line Classification.

[Return to Form](#)

NOTE: If the service line is not jointly owned, but the user would like to submit information about two different segments of the line, select Joint ownership. Comments clarifying the ownership status may be entered under Question 4 on the General Information tab or in columns Y and/or AH of the Detailed Inventory.

Columns M & N, School/Childcare Facility?: Indicate if the service line provides water to a school and/or childcare facility.

- A child care facility is "a location that houses a licensed provider of child care, day care, or early learning services to children as determined by the State licensing agency."
- A school is "any building associated with public, non-public/private, or charter institutions that primarily provides teaching and learning for elementary or secondary students."
- An **elementary** school contains students in grades up to and including grade 8 (includes pre-school).
- A **secondary** school contains students in grades no less than 9 and no greater than 12.

[Return to Form](#)



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SERVICE LINE INVENTORY FORM

Detailed Inventory Tab - System-Owned Portion	Return to Top
Columns O through Y : Complete the information in these columns for the <u>System-Owned Portion</u> of the service line <u>ONLY</u>. – If there is a portion of the service line that is customer-owned, that information should be entered in columns Z through AH. – If there is no system-owned portion, leave these boxes empty or set to the default value.	Return to Form
Column P, Was Material Ever Previously Lead? : If the response is "no", enter the evidence in the Additional Comments field (Column Y)	Return to Form
Column Q, Lead Pigtails, Goosenecks or Connectors Upstream? Indicate if there is a lead pigtail, gooseneck or connector between the main and the system-owned portion of the service line. If the response is "no", enter the evidence in the Additional Comments field (Column Y).	Return to Form
Columns R & S, Installation Date: – Select the decade from the dropdown box – If a more specific date is known, enter it in column S – If no information about installation date is available, note that under Additional Comments (Column Y).	Return to Form
Column T, Diameter : Enter the service line pipe inner diameter, in inches. Use up to two decimal places.	Return to Form
Columns U through X, Basis of Material Classification : At least one Basis of Material Classification must be selected for all service lines. Selections in these columns will be used to determine if there is sufficient evidence for a designation of Non-Lead. Refer to instructions for Column B for more information. – Use the dropdown menus in columns U & V to select non-field-based investigation method(s). – Use the dropdown menu in column W to select field-based verification method(s), and enter the date performed in Column X. – IMPORTANT NOTE: Water sampling can only be used as a basis for investigation if the system does not have Corrosion Control Treatment.	Return to Form
Column Y, System-Owned Service Line Additional Comments : Free form text field to enter additional pertinent or required information.	Return to Form

Detailed Inventory Tab - Customer Owned Portion	Return to Top
Columns Z through AH : Complete the information in these columns for the <u>Customer-Owned Portion</u> of the service line <u>ONLY</u>. – If there is a portion of the service line that is system-owned, that information should be entered in columns O through Y. – If there is no customer-owned portion, leave these boxes empty or set to the default value.	Return to Form
Column AA, Lead Pigtails, Goosenecks or Connectors Upstream? Indicate if there is a lead pigtail, gooseneck or connector <u>upstream</u> of the customer-owned portion of the service line. If the response is "no", enter the evidence in the Additional Comments field (Column AH). – Do not include pigtails, goosenecks or connectors in the System-Owned portion of the service line; these should be accounted for in Column Q. – Do not include pigtails, goosenecks or connectors that are downstream of the service line.	Return to Form
Columns AB & AC, Installation Date: – Select the decade from the dropdown box – If a more specific date is known, enter it in column AC – Enter the date in mm/dd/yyyy format – If no information about installation date is available, note that under Additional Comments.	Return to Form
Columns AD through AG, Basis of Material Classification : At least one Basis of Material Classification must be selected for all service lines. Selections in these columns will be used to determine if there is sufficient evidence for a designation of Non-Lead. Refer to the instructions for Column B for more information. – Use the dropdown menus in columns AD & AE to select non-field-based investigation method(s). – Use the dropdown menu in column AF to select field-based verification method(s), and enter the date performed in Column AG. – IMPORTANT NOTE: Water sampling can only be used as a basis for investigation if the system does not have Corrosion Control Treatment.	Return to Form
Column AH, Customer-Owned Service Line Additional Comments : Free form text field to enter additional pertinent information.	Return to Form



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SERVICE LINE INVENTORY FORM

Detailed Inventory Tab - Tap Sampling Information		Return to Top
Columns AI through AL, Information to Assign Tap Monitoring Tiering : Fill out information in these columns to automatically assign Tiers to tap sampling monitoring locations.		Return to Form
Column AI, Service Line Connected To : Indicate if the service line is connected to a Single Family Residence (SFR), Multi-Family Residence (MFR), or Other type of building		
– The building is considered a single family residence if one service line provides drinking water for one family. – The building is considered a multi-family residence if one service line provides drinking water for multiple families (e.g., apartment complex where there is only a single service line). – If the connection cannot be categorized as an SFR or MFR choose Building/Other.		Return to Form
Column AJ, POE Treatment Present? Locations with Point-Of-Entry treatment for Lead are not eligible for sampling under the Lead and Copper Rule.		
– IMPORTANT: If the location has a POU (Point-Of-Use) filter, sample from a different tap. For example, if the kitchen tap has a filter, collect a sample from the bathroom tap. – Do NOT collect LCR samples from a location with a POU filter. Do not remove the POU filter to collect a sample.		Return to Form
Summary Information		Return to Top
No information needs to be entered in this form. The tables will auto-populate based on the answers provided in this spreadsheet.		
Service Line Classification Summaries: The total number of Lead, Galvanized Requiring Replacement, Lead Status Unknown, and Non-Lead services lines is displayed. Breakout information regarding Schools & Daycares is also provided.		
Tap Sampling Monitoring Locations by Tier: A breakdown of the tap sampling location Tier assignments based on the information entered in the Detailed Inventory.		

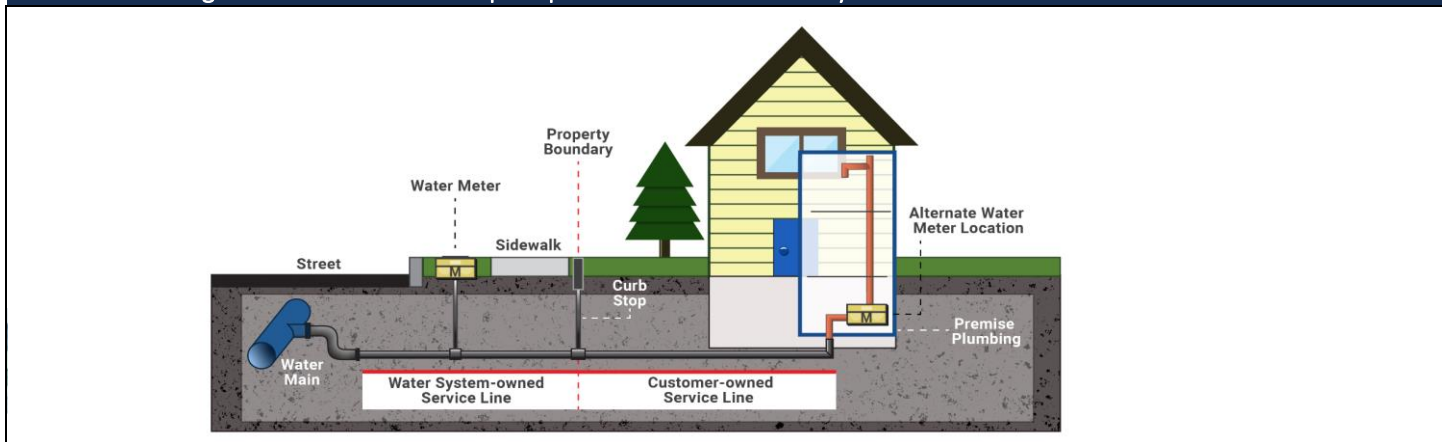


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SERVICE LINE INVENTORY FORM

IMPORTANT NOTE: The classification of a service line applies to the entire length of the service line, regardless of ownership

Service Line Designation Where Ownership Is Split Between the Water System and Customer



System-Owned Portion		Customer-Owned Portion		Service Line Classification ^{2,3,4,5}
Material Type		Material Type		
Lead or lead-lined		Any material		Lead
Any material		Lead or lead-lined		Lead
Unknown		Any material but lead or lead-lined		Lead Status Unknown
Any material but lead or lead-lined		Unknown		Lead Status Unknown
Any material but lead, lead-lined, galvanized, or unknown		Any material but lead, lead-lined, galvanized, or unknown		Non-Lead ¹
System-Owned Portion		Customer-Owned Portion		
Lead Connector Upstream?	Material Type	Lead Connector Upstream?	Material Type	
No	Any material but lead, lead-lined, or unknown	No	Galvanized	
No	Galvanized	No	Any material but lead, lead-lined, or unknown	
No	Galvanized	No	Galvanized	
No	Not previously lead	No	Galvanized	
Yes or Not sure	Galvanized	Any response	Any material but lead, lead-lined or unknown	
Yes or Not sure	Any material but lead, lead-lined or unknown	Any response	Galvanized	
No	Any material but lead, lead-lined or unknown	Yes or Not sure	Galvanized	
Any response	Previously lead or unsure if previously lead	Any response	Galvanized	

¹ Any determination of Non-Lead is subject to review and approval by the Department

² It is only necessary to replace the portions of the service line that are Lead or Galvanized Requiring Replacement.

³ When both portions of the service line are Lead or Galvanized Requiring Replacement, both portions must be replaced at the same time. Partial replacements are not allowed.

⁴ If either portion of the service line is classified as Lead Status Unknown, it must be replaced unless further investigation changes the classification to Non-Lead. The change in classification must be submitted to the Department in the Updated Inventory.

⁵ The presence of lead connectors, goosenecks or pigtails is only relevant to the determination of Galvanized Requiring Replacement.



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SERVICE LINE INVENTORY FORM

LCRR Tap Sampling Tier Determination			
Tier Level	Applies To:	* May Apply To:	**Does NOT apply to:
1	CWS Systems: Single Family Residence connected to a Lead Service Line NTNC Systems: Any building type connected to a Lead Service Line	CWS Systems: Multi Family Residence connected to a Lead Service Line if Multi Family Residences make up MORE than 20% of the distribution system	CWS & NTNC Systems: Service lines classified as Galvanized Requiring Replacement or Lead Status Unknown
2	CWS Systems: Any Building/Other connected to a Lead Service Line	CWS Systems: Multi Family Residence connected to a Lead Service Line if Multi Family Residences make up LESS than 20% of the distribution system	CWS Systems: Service lines classified as Galvanized Requiring Replacement or Lead Status Unknown; NTNC Systems
3	CWS Systems: Single Family Residences connected to a Galvanized Requiring Replacement Service Line NTNC Systems: Any building type connected to a Galvanized Requiring Replacement Service Line		CWS & NTNC Systems: Services lines classified as Lead Status Unknown
4	CWS Systems: Service lines connected to a Single Family Residence that contains copper pipes with lead solder		CWS Systems: Services lines classified as Lead Status Unknown; NTNC Systems
5	CWS Systems: Single Family and Multi Family Residences where the plumbing is representative of other locations served by the system NTNC Systems: Any building type where the plumbing is representative of other locations served by the system	CWS Systems: Service lines connected to a Building/Other location IF there are an insufficient number of Single Family or Multi Family Residential Tier 5 sites available	

* Buildings/residences with a Point of Use (POU) treatment device MAY be used for LCRR Tap Sampling - IF - there is another tap location that is used to dispense potable which does NOT have a POU device installed. It is not acceptable to sample from a location where the POU device has been removed for purposes of collecting a sample.

** Buildings/residences with a Point of Entry (POE) treatment device may NOT be used for LCRR Tap Sampling.



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SERVICE LINE INVENTORY FORM

Using Mechanical Excavation as Evidence of Non-Lead

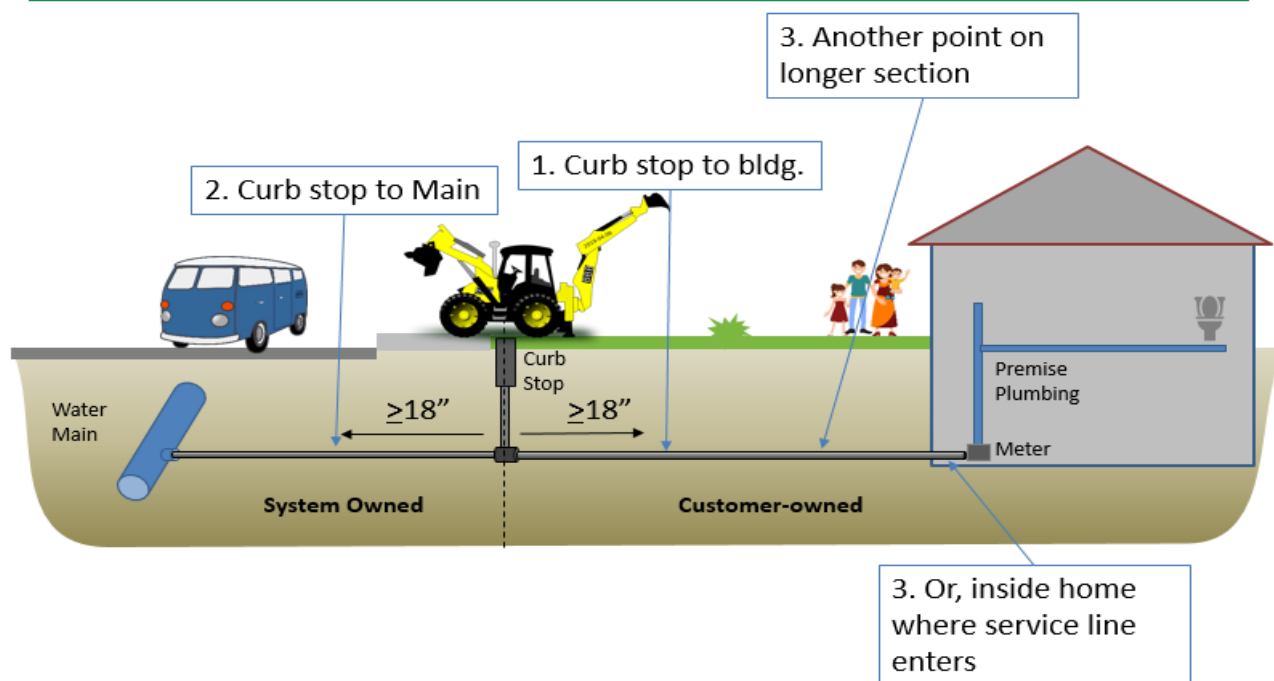
[Return to Instructions](#)

- "Mechanical Excavation" refers to any technique that allows physical access to the exterior of the service line piping, including but not limited to: trenching, potholing, and vacuum extraction.
- To provide sufficient evidence for a designation of Non-Lead, mechanical excavation must be performed at a minimum of 3 locations across the length of the service line, as follows*:

1. Curb stop to building
 - A minimum of 18 inches from the curb stop
 - OR –
 - If the distance to the building is less than 18 inches, halfway to the building
2. Curb stop to water main
 - A minimum of 18 inches from the curb stop
 - OR –
 - If the distance to the water main is less than 18 inches, halfway to the main
3. Third point (choose one)
 - Inside the home where the service line enters if visible (must be inspected by system personnel not the home owner)
 - OR –
 - A second excavation point in the longer section of the service line that is at least halfway between the first point and the building or water main

*EXCEPTION: If the system is using Mechanical Excavation as the means of identification on only one side of a Jointly-owned system, then only two-points of verification are needed on that side.

3-Point Field Verification – Non-Lead





COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SAFE DRINKING WATER

SERVICE LINE INVENTORY FORM

Inventory Requirements of the LCRR		
Question	Answer	Regulatory Citation(s)
1. Who must prepare a service line inventory?	All community water systems (CWSs) and non-transient non-community water systems (NTNCWSs).	40 CFR §141.84(a)
2. What material classification should I use?	Service lines must be classified as one of four types: – Lead, – Galvanized Requiring Replacement (GRR), – Non-Lead, (specify the actual material such as copper or plastic), or – Lead Status Unknown. → This spreadsheet will determine the service line classification for you if completed correctly. → Where the material is unknown, EPA recommends that systems consider using subclassifications to capture additional information (e.g., unknown - unlikely lead).	40 CFR §141.84(a)(4) and §109.706
3. What if the service lines in my system are split ownership, meaning that my system owns a portion and the customer owns a portion?	The inventory must include both the system-owned and customer-owned portions of the service line; however, systems must count each service line from the water main to the interior building plumbing only once for determining the number of service lines requiring replacement (i.e., lead service lines and GRR), assigning a tap sample tiering classification, and facilitating reporting of inventory information to states and EPA. See the "Class & Tier Info" tab for information on how the spreadsheet classifies service lines that have split ownership.	40 CFR §§141.84(a)(2) & (a)(7)(i)
4. What information should I use to identify service line material and prepare my inventory?	You must use previous materials evaluation, construction and plumbing codes/records, water system records, distribution system inspections and records, information obtained through normal operations, and state-specified information to prepare your inventory. EPA recommends systems consider additional service line investigation methods such as visual inspection, water quality sampling, and excavation.	40 CFR §§141.84(a)(3) & (a)(5)
5. When is the initial inventory due?	October 16, 2024.	40 CFR §141.80(a)(3) ¹
6. What if I have no Lead, Galvanized Requiring Replacement (GRR), or Lead Status Unknown service lines?	You have some different requirements that are explained in the answers to questions 7, 8, and 9.	N/A
7. Do I need to update my inventory?	For systems with Lead, GRR, or Lead Status Unknown service lines The service line inventory should improve over time with better information. You must submit inventory updates to your state on the following frequency: (1) Annually if you conduct lead tap sampling semi-annually or annually. (2) Triennially (i.e., once every 3 years) if you conduct lead tap sampling triennially. For systems with only Non-Lead service lines You are not required to provide an update. However, if you subsequently find any LSL or galvanized requiring replacement service line, you must notify your state within 30 days and prepare an updated inventory on a schedule established by the state.	40 CFR §141.90(e)(3)
8. Do I need to make my information publicly available?	For systems with Lead, GRR, or Lead Status Unknown service lines You must make the inventory publicly available and include a locational identifier for lead service lines and GRR. Water systems serving more than 50,000 people must provide inventories on-line. For systems with only Non-Lead service lines You can provide a written statement, in lieu of the inventory, that your distribution system has no lead service lines or GRR service lines along with a general description of all applicable sources used to make that determination.	40 CFR §§141.84(a)(8) & (a)(9)
9. Do I need to include a statement in my Consumer Confidence Report (CCR)?	For systems with Lead, GRR, or Lead Status Unknown service lines CWSs must indicate how the public can access the service line inventory information in their CCR. For systems with only Non-Lead service lines CWSs must include a statement that a service line inventory contains no lead service lines and instructions on how to access the information.	40 CFR §141.153(d)(4)(xi)
10. What information must States report to EPA?	For each water system, the number of Lead, GRR, and Lead Status Unknown service lines in its distribution system, reported separately.	40 CFR §142.15(c)(4)(iii)(D)

Notes:

¹ On June 10, 2021, EPA signed a rule extending the compliance date from January 16, 2024 to October 16, 2024 (86 FR 31939).

3930-FM-BSDW0042a Rev. 4/2023



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SAFE DRINKING WATER

SERVICE LINE INVENTORY FORM

General Information			
Revision Tracking			
Inventory Type: <i>Initial</i>	Initial Inventory Date (Required): 10/16/2024	Updated Inventory Date:	
Facility Information			
Water System Name:			
Borough of Ambler			
PWSID (7-digit number): 1460020	Total Population Served (number of people): 20,000	Number of Service Connections: 6029	PWS Type: <i>CWS</i>
1. If CWS, do multi-family residences comprise $\geq 20\%$ of the structures served?			<i>No</i>
2. Does the number of service connections reported on the Detailed Inventory tab (shown above), match the number reported to DEP on the annual Average Daily Water Use form?			<i>Yes</i>
3. Does the water system serve any Disadvantaged Communities? <i>If Yes, enter approximate percentage:</i>			<i>No</i>
			<i>0%</i>
4. Is there documentation that defines service line ownership in this system, such as a local ordinance? <i>If Yes, describe below (250 character maximum):</i>			<i>Yes</i>
Ord.917, 12/26/1995 2 Supplement NO. 43 To Tariff Water - PA. P.U.C. NO. 5			
Physical Address			
Street (No P.O. Boxes): 131 Rosemary Avenue			
City or Town: Ambler	State: PA	Zip Code: 19002	
Mailing Address (if different from Physical Address)			
Street or P.O. Box:			
City or Town:	State:	Zip Code:	
Contact Person			
Name: Steven Smallberger	Title: Water Superintendent		
Telephone (ten digit): 215-646-1000	Email: ssmallberger@borough.ambler.pa.us		
Report Prepared By:			
Name: Phillip Benigno		Same as Contact Person?	No
Title/Affiliation: Water Department			
Telephone (ten digit): 215-646-1000		Email: ssmallberger@borough.ambler.pa.us	
Public Access Documentation			
How is the system making its inventory accessible to the public? Check all that apply.			
NOTE: <i>If the system serves > 50,000 people, the inventory MUST be provided on-line.</i>			
☐ Interactive on-line map	☐ Information on water utility mailings or newsletter		
☐ Static on-line map	☒ Hard copy information available in water system office		
☐ Printed service line map	☐ Other		
☐ Printed tabular data			
<i>If "Other", please describe (250 character maximum):</i>			



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SAFE DRINKING WATER

SERVICE LINE INVENTORY FORM

Inventory Methodology	
PWS Name: Borough of Ambler PWSID: 1460020	Yes

Part 1: Historical Records Review			
Type of Record	Examples	Describe the Records Reviewed (250 character maximum)	Level of Confidence in Records
1. Previous Materials Evaluation	<i>Locations of Tier 1 lead tap sampling locations that are served by a lead service line.</i>	Tap Cards and Lead and Copper Sampling Results	Medium
2. Construction and Plumbing Codes and Records	<i>Local ordinance adopting an international plumbing code. Permits for replacing lead service lines.</i>	Ord. 872, 10/21/1991, §4)	Medium
3. Water System Records	<i>Distribution system maps. Tap cards. Meter installation records. Standard operating procedures.</i>	Tap Cards and meter installation records.	Medium
4. Distribution System Inspections and Records	<i>Service line repair/replacement records. Inspection records.</i>	Service Line Replacement Records and Meter Replacements and Inspections.	Medium
5. Other			No Records

Part 2: Identifying Service Line Material During Normal Operations	
1. During which normal operating activities is information collected about service line material? Check all that apply. ☐ Water meter reading ☒ Water main repair or replacement ☒ Water meter repair or replacement ☒ Backflow prevention device ☒ Service line repair or replacement ☐ Other <i>If "Other", please explain (250 character maximum):</i>	
2. Has the system developed standard operating procedures (SOPs) for collecting service line material information? <i>If "Yes", please describe (250 character maximum):</i>	No

Part 3: Service Line Investigations																			
1. Identify the service line investigation methods used by the system to prepare this inventory (check all that apply).																			
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr style="background-color: #005596; color: white;"> <th style="padding: 5px;">Column A: File/Record Review</th> </tr> <tr> <td style="padding: 5px;">☒ Customer Self-Identification</td> </tr> <tr> <td style="padding: 5px;">☒ Previous Materials Evaluation</td> </tr> <tr> <td style="padding: 5px;">☒ Installation Record (e.g., tap card)</td> </tr> <tr> <td style="padding: 5px;">☒ Repair or Replacement Record</td> </tr> <tr> <td style="padding: 5px;">☐ Other type of record review</td> </tr> </table>	Column A: File/Record Review	☒ Customer Self-Identification	☒ Previous Materials Evaluation	☒ Installation Record (e.g., tap card)	☒ Repair or Replacement Record	☐ Other type of record review	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr style="background-color: #005596; color: white;"> <th style="padding: 5px;">Column B: Analytics</th> </tr> <tr> <td style="padding: 5px;">☒ Statistical Analysis</td> </tr> <tr> <td style="padding: 5px;">☐ Predictive Modeling</td> </tr> <tr> <td style="padding: 5px;">☐ Water Quality Sampling</td> </tr> <tr> <td style="padding: 5px;">☐ Other analytics technique</td> </tr> </table>	Column B: Analytics	☒ Statistical Analysis	☐ Predictive Modeling	☐ Water Quality Sampling	☐ Other analytics technique	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr style="background-color: #005596; color: white;"> <th style="padding: 5px;">Column C: Physical Inspection</th> </tr> <tr> <td style="padding: 5px;">☒ Visual Inspection at Existing Access Point</td> </tr> <tr> <td style="padding: 5px;">☐ CCTV Inspection Inside Pipe</td> </tr> <tr> <td style="padding: 5px;">☐ CCTV Inspection Outside Pipe (Curb Box)</td> </tr> <tr> <td style="padding: 5px;">☒ Mechanical Excavation (e.g., Potholing, Trenching)</td> </tr> <tr> <td style="padding: 5px;">☐ Other physical inspection method</td> </tr> </table>	Column C: Physical Inspection	☒ Visual Inspection at Existing Access Point	☐ CCTV Inspection Inside Pipe	☐ CCTV Inspection Outside Pipe (Curb Box)	☒ Mechanical Excavation (e.g., Potholing, Trenching)	☐ Other physical inspection method
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☒ Mechanical Excavation (e.g., Potholing, Trenching)																			
☐ Other physical inspection method																			
<i>If "Other", please explain (250 character maximum):</i>																			
2. How are service line locations selected for physical inspection? For example, environmental justice, sensitive populations, statistical modeling, or targeting areas with high numbers of Lead Status Unknowns? (250 character maximum) Age of property and those properties with unknown status.																			

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SAFE DRINKING WATER

SERVICE LINE INVENTORY FORM

Inventory Response Summary information

PWS Name: Borough of Ambler

PWSID: 1460020

NOTES: Information will autofill based on the responses in the Detailed Inventory. Record types marked "Inactive" are not included.

Service Line Classification Summary

Service Line Classification	Definition	Number	Percentage
Lead	Any portion of the service line is known to be made of lead.	0	
Galvanized Requiring Replacement	A portion of the service line is galvanized and is downstream from: – a portion that was previously lead or is of unknown lead status – connectors that are lead or unknown	344	6%
Lead Status Unknown	The service line material is not known. There is not enough evidence to support material classification.	747	12%
Non-Lead	An evidence-based record, method, or technique has demonstrated that ALL portions of the service line are NOT lead or GRR.	4,939	82%
TOTAL NUMBER OF ACTIVE SERVICE LINES ENTERED IN THE DETAILED INVENTORY		6,029	100%

Service Line Classification by School/Childcare Summary

	Number	Percentage
Service Lines Connected to a Childcare facility:	3	100%
Lead	0	
Galvanized Requiring Replacement	0	
Lead Status Unknown	0	
Non-Lead	3	100%
Service Lines Connected to an Elementary School:	0	
Lead	0	
Galvanized Requiring Replacement	0	
Lead Status Unknown	0	
Non-Lead	0	
Service Lines Connected to an Secondary School:	0	
Lead	0	
Galvanized Requiring Replacement	0	
Lead Status Unknown	0	
Non-Lead	0	
Lead Status Unknown Service Lines:	0	
Likely Lead	0	
Unlikely Lead	0	



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DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF SAFE DRINKING WATER

SERVICE LINE INVENTORY FORM

Inventory Response Summary information

PWS Name: Borough of Ambler

PWSID: 1460020

NOTES: Information will autofill based on the responses in the Detailed Inventory. Record types marked "Inactive" are not included.

Tap Sample Monitoring Locations by Tier

Tier	Number	Percentage
Tier 1	0	
*Tier 1 – or – Tier 2	0	
Tier 2	0	
Tier 3	0	
Tier 3 (if not enough Tier 1)	0	
Tier 4	0	
Tier 5	10	100%
Tier 5 (if not enough Tier 1 & 3)	0	
**Tier 5 – or – Does not meet tiering criteria	0	
NUMBER OF TIERED LOCATIONS:	10	
NUMBER OF SERVICE LINE LOCATIONS NOT TIERED:	6,019	100%

*For CWS, if the %MFRs is > 20%, a proportional number of MFRs may be assigned to Tier 1

**For CWS, if there are insufficient SFR & MFR Tier 5 structures, may use Building/Other

Exhibit 3

THE BOROUGH OF AMBLER RATES AND RULES GOVERNING THE
FURNISHING OF WATER SERVICE TO CONSUMERS LOCATED OUTSIDE
OF THE BOROUGH OF AMBLER IN THE TOWNSHIPS OF UPPER DUBLIN,
WHITEMARSH, WHITPAIN AND LOWER GWYNEDD, ALL IN
MONTGOMERY COUNTY, PENNSYLVANIA

NOTICE

THIS TARIFF SUPPLEMENT IMPLEMENTS THE WATER DEPARTMENT'S
LEAD SERVICE LINE REPLACEMENT PROGRAM

(C)

(C)

By: Steve Smallberger
Water Superintendent
Borough of Ambler Water Department
131 Rosemary Avenue
Ambler, PA 19002

(C) Indicates Change

ISSUED: XXXXX

EFFECTIVE: XXXXX

BOROUGH OF AMBLER

SUPPLEMENT NO. XX TO
TARIFF WATER – PA. P.U.C. NO. 5
XX REVISED PAGE NO. 2
CANCELLING XX REVISED PAGE NO. 2

LIST OF CHANGES

Supplement No. XX implements the Water Department's Lead Service Line Replacement Program, which addresses the Water Department's efforts to replace Water Department-Owned and Customer-Owned Lead Service Lines.

(C) Indicates Change

ISSUED: XXXXX

EFFECTIVE: XXXXX

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Customer Charge	Twenty-First Revised Page No. 4	
Meter Size	Twenty-First Revised Page No. 4	
Consumption Charge	Twenty-First Revised Page No. 4	
Single Point Service	Twenty-First Revised Page No. 4	
Flat Rate Schedule.....	Twenty-First Revised Page No. 5	
Fire Protection Service.....	Twenty-First Revised Page No. 5	
.....	Twentieth Revised Page No. 5A	
Domestic Multiple Meter Sets	Twentieth Revised Page No. 5A	
Distribution System Improvement Charge (“DSIC”)	Third Revised Page No. 5B	
.....	First Revised Page No. 5B1	
.....	Third Revised Page No. 5C	
.....	Original Page No. 5D	
.....	Original Page No. 5E	
Rates for Water for Building Purposes	Fifth Revised Page No. 6	
Definitions.....	Original Page No. 6A	
.....	Original Page No. 6B	
Rules and Regulations.....	First Revised Page No. 7	
Applications for Service	First Revised Page No. 7	
Deposits	Second Revised Page No. 8	
Refund of Deposit.....	Second Revised Page No. 8	
.....	Fifth Revised Page No. 9	
Refund Statement	Fifth Revised Page No. 9	
.....	Second Revised Page No. 10	
Discontinuance of Service	Second Revised Page No. 10	
.....	Fifth Revised Page No. 11	
Turn Off Water Without Authority.....	Fifth Revised Page No. 11	
Reserve Supply	Fifth Revised Page No. 11	
Renewal of Service After Discontinuance	Fifth Revised Page No. 11	

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ISSUED: XXXXX

EFFECTIVE: XXXXX

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.....	Original Page No. 31	(C)

(C) Indicates Change

ISSUED: XXXXX

EFFECTIVE: XXXXX

LEAD SERVICE LINE REPLACEMENT PROGRAM

(C)

(1) Supersession

This section of the Water Department’s tariff supersedes all other conflicting provisions of this tariff for purposes of implementing the Water Department’s Lead Service Line Replacement Program.

(2) Definitions

Company: The Borough of Ambler Water Department (“Water Department”).

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.

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

Customer-Owned Lead Service Line (“Customer-Owned LSL”): The portion of the LSL extending from the Curb Stop to the meter or the first shut-off valve 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.

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.

Lead Service Line (“LSL”): 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 LSL if it ever was or is currently downstream of any LSL or Service Line of unknown material.

Lead Service Line Replacement (“LSLR”): A Service Line, whether Water Department-Owned or Customer-Owned, installed to replace a LSL.

Lead Service Line Replacement Plan (“LSLR Plan”): A plan and supporting documents submitted to and approved by the Commission that specify how the Water Department intends to implement its LSLR Program.

Lead Service Line Replacement Program (“LSLR Program”): A program submitted to and approved by the Commission for the replacement of LSLs by the Water Department.

(C)

(C) Indicates Change

LEAD SERVICE LINE REPLACEMENT PROGRAM (continued)

(C)

(2) Definitions (continued)

Lead Service Line Replacement Project (“LSLR Project”): A Water Department-scheduled LSLR activity either in conjunction with main replacements or as part of a LSLR Plan.

Lead Service Line Replacement Project Area (“LSLR Project Area”): The area encompassing the Water Department’s scheduled LSLR activities, which includes the area within a one-mile radius of a LSLR Project if served by the Water Department.

Lead Service Line Replacement Project Commencement (“LSLR Project Commencement”): Installation of the first LSLR within a LSLR Project Area.

Partial Lead Service Line Replacement (“Partial LSLR”): A LSLR that does not replace both the Water Department-Owned and Customer-Owned portions of a LSL.

Property Owner Agreement: An agreement between the Water Department and a property owner for the replacement of a Customer-Owned LSL that allows the Water Department’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 Water Department to replace the Customer-Owned LSL.

Service Line: The pipe and appurtenances which connect any main to the Water Department’s water meter or, if the Water Department’s water meter is located outside of the structure or the connection is not metered by the Water Department, 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 C.F.R. 141.1-143.20 as enforced by the Department of Environmental Protection, inclusive of future changes as those regulations may be amended.

Water Department-Owned Lead Service Line (“Water Department-Owned LSL”): The portion of the LSL extending from the Water Department’s main to the Curb Stop.

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

(C)

(C) Indicates Change

ISSUED: XXXXX

EFFECTIVE: XXXXX

LEAD SERVICE LINE REPLACEMENT PROGRAM (continued)

(C)

(3) **LSLR Plan**

Notwithstanding the Rules in this tariff relating to Customer responsibility for Customer Service Lines, the Water Department will replace Customer-Owned LSLs pursuant to its LSLR Plan, subject to an annual cap described below. The Water Department may modify its annual cap for LSLRs with Commission approval. The costs incurred by the Water Department to undertake its LSLR Plan shall be recoverable through the Water Department's DSIC or base rates, as applicable.

The Water Department's LSLR Plan applies to any LSL serving any Customer, the replacement of which is operationally feasible, and where the property owner authorizes the replacement or replaces the line in accordance with the Water Department's LSLR Program.

(4) **LSLR Annual Cap**

The Water Department will cap LSLR Projects at 20 Customer-Owned LSLRs on an annual basis. If a Customer reimbursement provided pursuant to this tariff, or an emergency LSLR causes the Water Department to exceed its annual cap, the Water Department will increase its current annual cap by the number and cost of emergency repairs and/or reimbursements and decrease its annual cap by the same for the following year only.

(C)

(C) Indicates Change

ISSUED: XXXXX

EFFECTIVE: XXXXX

LEAD SERVICE LINE REPLACEMENT PROGRAM (continued)

(C)

(5) LSL Replacements

The Water Department 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 Water Department replaces a Water Department-owned main connected to a Customer-Owned LSL; (ii) at any property where the Water Department replaces a Water Department-Owned LSL connected to a Customer-Owned LSL; (iii) at any property with a private-side only LSL located within a LSLR Project Area where LSLRs are performed; and (iv) when the Water Department's operations crew replaces a Water Department-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 Water Department has exercised "stand in the shoes" rights, the Water Department shall enter into a Property Owner Agreement with the property owner for replacement of a Customer-Owned LSL that allows the Water Department'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 Water Department to replace the Customer-Owned LSL. The Property Owner Agreement shall be in a form provided by the Water Department and shall include provisions that require property owner(s) to release and hold harmless the Water Department from any and all claims, causes of action, damages or losses, of any nature whatsoever with respect to the work performed by the Water Department or its contractors.

(C)

(C) Indicates Change

ISSUED: XXXXX

EFFECTIVE: XXXXX

LEAD SERVICE LINE REPLACEMENT PROGRAM (continued)

(C)

(6) Customer Refusal

Except as set forth below, if, after being notified of the Water Department'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 Water Department 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 one 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 the Water Department to complete the LSLR or to replace the Customer-Owned LSL concurrent with the Water Department replacing the Water Department-Owned LSL may lead to termination of water service prior to the Water Department replacing the Water Department-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 the Water Department undertakes the aforementioned steps, the Water Department 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 Water Department will make a record of and document the Customer's refusal. The Water Department will then schedule to replace its portion of the Water Department-Owned LSL. The Water Department will notify the Customer in writing of the Partial LSLR no later than ten days prior to the scheduled replacement and explain that it will terminate water service at that location the day prior to replacing the Water Department-Owned LSL. The Water Department will post a termination notice at the Customer property 48 hours prior to termination. The Water Department 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 Water Department 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 Water Department is not required to comply with termination procedures described in other portions of its tariff or the Commission's regulations.

(C)

(C) Indicates Change

ISSUED: XXXXX

EFFECTIVE: XXXXX

LEAD SERVICE LINE REPLACEMENT PROGRAM (continued)

(C)

(6) Customer Refusal (continued)

If 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 Water Department-Owned LSL and the Customer-Owned LSL have been replaced or, in the Water Department's sole discretion, an alternative, non-lead temporary bypass is installed.

The Water Department 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 the replacement of the Customer-Owned LSL by providing a paid invoice from a licensed contractor or a notarized statement from a licensed contractor attesting to completion of the LSLR.

(7) Non-Owner-Occupied Properties

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

- i. The Water Department 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 Water Department has made attempts to obtain authorization for the Customer-Owned 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 Water Department has notified the legal owner, but the owner has never responded.

(C)

(C) Indicates Change

ISSUED: XXXXX

EFFECTIVE: XXXXX

LEAD SERVICE LINE REPLACEMENT PROGRAM (continued)**(7) Non-Owner-Occupied Properties (continued)**

In such instances, and when, in the sole discretion of the Water Department, replacing the Customer-Owned LSL and preventing the termination of water service would be reasonable and in the public interest, the Water Department 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 Water Department's replacement in this circumstance without the property owner's consent is in furtherance of the Water Department'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.

In any such instance of replacement, the Water Department, and any person associated with the Water Department, 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 Water Department 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 Water Department will not proceed with the replacement and will proceed with termination procedures as specified in section (6) above. The Water Department also retains discretion to refuse to replace a Customer-Owned LSL in circumstances where the Water Department's employees or contractors may be placed in a dangerous situation in attempting to do the replacement.

(C) Indicates Change

ISSUED: XXXXX

EFFECTIVE: XXXXX

LEAD SERVICE LINE REPLACEMENT PROGRAM (continued)**(8) Service Line Demarcation**

If a shutoff valve is not located within 12 inches of the structure wall of the property, the Water Department 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 Water Department 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 Water Department can obtain necessary permits during the planning phase of a LSLR Project.

(9) Prohibition on Partial LSLRs and Notice Requirements

Neither a Customer nor a property owner may install a Partial LSLR. A Partial LSLR installed following Commission approval of the Water Department's LSLR Plan may result in immediate termination of service until both the Water Department-Owned LSL and Customer-Owned LSL have been replaced, 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 Water Department 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 Water Department replacing the Water Department-Owned LSL, provided that the Customer or property owner, if the Customer is not the property owner, shall provide the Water Department at least 180 days' notice prior to replacing the Customer-Owned LSL.

The Water Department shall not connect an applicant for water service to the Water Department-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 Water Department'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.

(C) Indicates Change

ISSUED: XXXXX

EFFECTIVE: XXXXX

LEAD SERVICE LINE REPLACEMENT PROGRAM (continued)**(10) 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 may submit to the Water Department a reimbursement form located on the Water Department'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 Water Department's discretion. A paid invoice must be submitted for reimbursement.

The Water Department will review the information that was provided within 90 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 Water Department will contact the Customer or property owner to request the necessary information to determine eligibility. The Water Department will have an additional 45 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. To obtain a reimbursement, the Customer or property owner will be responsible to provide, among other things, proof of the existence of a LSL at the property, proof the customer-owned LSL was replaced by a copper service line, a detailed estimate of work from the contractor, and a paid invoice. Instead of a detailed estimate, a verified statement from the contractor attesting to completion of a LSLR with a new copper service line may be sufficient, at the Water Department's sole discretion. Unless otherwise approved by the Water Department, only customer-owned service line replacements installing copper service lines will be eligible for reimbursement. 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 12 months, on a rolling basis, that the Water Department 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 Water Department will issue a check within 90 days after verifying that the Customer or property owner is eligible for reimbursement.

(C) Indicates Change

ISSUED: XXXXX

EFFECTIVE: XXXXX

LEAD SERVICE LINE REPLACEMENT PROGRAM (continued)(11) Warranty

For Customer-owned LSLs replaced directly by the Water Department or by a contractor at the Water Department's request, the Water Department 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 Water Department or a contractor at the Water Department'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 Water Department shall have no liability for any damages not covered by the warranty.

(12) Limitation of Liability

The Water Department's liability relating to LSLR efforts is limited as set forth in this tariff.

(13) Restoration

The Water Department 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. The Water Department will also grade and re-seed backfilled trenches, but the Water Department will have no maintenance responsibility with respect to the restored property. No other restoration will be conducted for LSLRs. The Water Department will not replace any landscaping, interior finishes, paving, or walkways. Except as stated above, all restoration costs shall be borne by the Customer or property owner, if the Customer is not the property owner.

(14) Ownership and Responsibility for Replacement Line

After a Customer-Owned LSL is replaced by the Water Department, the Customer or property owner, if the Customer is not the property owner, 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.

Exhibit 4

Ambler Borough

LSLR Program Filing Docket No. P-2024-3050266

Data Responses to 52 Pa. Code § 53.52

Part (a) Whenever a public utility, other than a canal, turnpike, tunnel, bridge or wharf company files a tariff, revision or supplement effecting changes in the terms and conditions of service rendered or to be rendered, it shall submit to the Commission, with the tariff, revision or supplement, statements showing all of the following:

1. The specific reasons for each change.

Response: The Borough is filing this proposed tariff change to comply with the Commission's regulations under Act 120 of 2018 ("Act 120") at 52 Pa. Code § 65.51 et seq.

2. The total number of customers served by the utility.

Response: The Borough serves approximately 3,849 PUC-jurisdictional customers.

3. A calculation of the number of customers, by tariff subdivision, whose bill will be affected by the change:

Response: No customer bills will be affected by the proposed change.

4. The effect of the change on the utility's customers.

Response: Customers that have lead service lines will have the opportunity to have the Borough, or its contractors, replace their customer lead service line at no direct cost to that customer. Additionally, customers that have replaced their lead service lines may be eligible for reimbursement of those costs.

5. The direct or indirect effect of the proposed change on the utility's revenue and expenses.

Response: Under Act 120, the costs associated with the LSLR Program will be funded through a combination of grants, loans, and, upon Commission approval of appropriate updates to the Borough's Long-Term Infrastructure Improvement Plan, DSIC revenue. The Borough anticipates that additional costs of its LSLR Program will be reflected in its next base rate case.

6. The effect of the change on the service rendered by the utility.

Response: See response to No. 4.

7. All factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each.

Response: The Borough considered the following factors in determining to make the proposed change in the tariff: (a) the Borough is required to comply with Act 120 and the Commission's regulations which require that the Borough submit a LSLR Program in accordance with the Commissions regulations no later than the effective date of rates established under the entity's next base rate case filed following the effective date of the Commission's lead regulations or within two years of the effective date of the Commission's lead regulations, whichever comes first; and (b) the public interest benefits of reducing and eliminating lead service lines throughout the Borough's system.

These factors were chosen because they are regulatory requirements and the Borough desires to improve overall system integrity and safety for the benefit and health of the Borough's customers.

8. Studies undertaken by the utility in order to specifically address the proposed changes.

Response: None.

9. Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.

Response: No polling was conducted, nor public meeting held, nor public comment submitted on the proposed tariff.

10. Plans the utility has for introducing or implementing the changes with respect to its ratepayers.

Response: The Borough has included in its filed LSLR Program various communications and outreach documents as required by the Commission's regulations.

11. FCC, FERC, or Commission orders or rulings applicable to the filing.

Response: *Rulemaking to Implement Act 120 of 2018 at 52 Pa. Code Chapters 65 and 66, Docket No. L-2020-3019521 (Final Rulemaking Order entered Mar. 14, 2022).*

VERIFICATION

I, Steven Smallberger, hereby depose and state that I am the Water Superintendent of Ambler Borough Water Department and that in this capacity I am authorized to, and do, make this Verification on its behalf, that the facts set forth in the foregoing document are true and correct to the best of my knowledge, information and belief. This Verification is made subject to the penalties of 18 Pa. C.S.A. § 4904 relating to intentional falsification to authorities.

Dated: 4-15-25

Steven Smallberger