



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

May 15, 2025

IN REPLY PLEASE
REFER TO OUR FILE

Docket No. A-2025-3054442
Utility Code 212285

ERIN K FURE ESQUIRE
PENNSYLVANIA-AMERICAN WATER COMPANY
852 WESLEY DRIVE
MECHANICSBURG PA 17055
ERIN.FURE@AMWATER.COM

RE: Application of Pennsylvania-American Water Company for approval, *nunc pro tunc*, of the right to offer, render, furnish, and supply water service to the public in additional portions of Gilberton Borough and West Mahanoy, Ryan and New Castle Townships, Schuylkill County, Pennsylvania at Docket No. A-2025-3054442

Dear Attorney Fure:

On April 7, 2025, Pennsylvania-American Water Company (PAWC) filed the above-captioned document (Application) with the Pennsylvania Public Utility Commission (Commission). For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

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

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

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

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

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

Signature _____
Title _____
Date _____

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

In addition, to expedite completion of the review, please send a copy of the response to Susan Johnson, in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at suejohnso@pa.gov. Please also direct any questions to Susan Johnson at telephone number (717) 783-5946. Thank you in advance for your cooperation.

Sincerely,



Matthew L. Homsher
Secretary

Enclosure: TUS Data Request Set 1

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

TUS Data Request Set 1

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

- A-1. The Application's Exhibit B-1, Map of the Applied for Service Territory, depicts the four requested service territories (Requested Territories). However, the map does not depict the location or route of the water facilities or the elevations of the major facilities. 52 Pa. Code § 3.501(a)(2)(ii) requires applicants to identify the location or route of water facilities and 52 Pa. Code § 3.501(a)(2)(iv) requires applicants to identify the elevations of the major facilities. For each Requested Territory, please provide individual maps of suitable scale that depict the location or route of PAWC's water facilities, along with the elevations of the major facilities.
- A-2. Please provide copies of final subdivision plans for each phase of the Laurel Ridge Development, located in Requested Territory Area 3.
- A-3. Please provide copies of PAWC's public water supply construction and operations permits for facilities installed by PAWC to extend water service to the Requested Territories (e.g., PAWC's consecutive water system or systems in Areas 3 and 4, etc.) and the associated approval letters.
- A-4. In the Application's Section III, Paragraph 8, PAWC indicated the Requested Territories consist of approximately 301 acres. Please quantify the area of each Requested Territory.
- A-5. Please provide a detailed breakdown, by major plant category, of the used and useful plant in service constructed in each Requested Territory. The breakdown should fully describe each asset and identify the size, type, material, unit quantity, cost, and year of installation.
- A-6. In the Application's Section III, Paragraph 10, PAWC indicated the Requested Territories service a total of 81 customers. Please provide the following:
 - a. A breakdown of the number of customers for each Requested Territory, by customer class; and
 - b. A breakdown of the projected number of customers for each Requested Territory, by customer class, by year, for the next five years.
- A-7. In the Application's Section III, Paragraph 10, PAWC indicated that there was one other public authority customer. However, the Application's Exhibit I, Revenue and Expenses for Applied for Service Territory, reflected two municipal customers. Please explain this apparent discrepancy and, if necessary, provide a revised Exhibit I.
- A-8. In the Application's Section III, Paragraph 12, PAWC indicated that operations for the Requested Territories will continue through PAWC's Center Street Water Treatment

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Plant (WTP) and a system interconnection with Schuylkill County Municipal Authority (SCMA Interconnection). Please provide responses for the following:

- a. Clarify the permitted average daily and maximum daily treatment capacity of the Center Street WTP;
 - b. Clarify the permitted or contracted average daily and maximum daily supply capacity of the SCMA Interconnection.
 - c. Clarify the projected average daily and the maximum daily demand for the Center Street WTP, by each of the Requested Territories;
 - d. Clarify the projected average daily and maximum daily demand for the SCMA Interconnection, by each of the Requested Territories;
 - e. Provide copies of current agreements between PAWC and SCMA that describe services exchanged and rates charged by each party for the SCMA Interconnection and Areas 3 and 4; and
 - f. Confirm whether the agreements provided in response to Data Request A-8.e. must be filed with the Commission pursuant to Section 507 of the Pennsylvania Public Utility Code and provide evidence of any certificates of filing for these agreements.
- A-9. Please verify that PAWC's existing water facilities have adequate capacity to meet present and future needs of existing customers and the customers within the Requested Territories.
- A-10. In the Application's Section III, Paragraph 14, PAWC indicated that multiple letters have been sent to Schuylkill County and to Gilberton Borough's, and West Mahanoy, Ryan, and New Castle Townships' Planning Commissions requesting verification that this Application complies with applicable county and township comprehensive plans, without receiving responses. Also, PAWC's Project Engineer, Bruce Brubaker, P.E., confirmed that he reviewed the comprehensive plans of West Mahanoy and New Castle Townships, and that PAWC's Application is consistent with these two comprehensive plans. Please provide a statement confirming that the Application does or does not meet all the application requirements or mandates of the following:
- a. Gilberton Borough's officially adopted comprehensive plan and applicable zoning designations, including any amendments;
 - b. Ryan Township's officially adopted comprehensive plan and applicable zoning designations, including any amendments; and

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- c. Schuylkill County's officially adopted comprehensive plan, including any amendments.
- A-11. In the Application's Section IV, Paragraphs 20 and 21, PAWC indicated it attached PAWC's balance sheet as of December 31, 2024 (2024 Balance Sheet) as Exhibit F and PAWC's statement of income and retained earnings for the 12 months ended December 31, 2024 (2024 Income Statement) as Exhibit G. However, Exhibit F shows PAWC's balance sheet as of December 31, 2023, and Exhibit G shows PAWC's income statement for the 12 months ended December 31, 2023. Please provide the 2024 Balance Sheet and 2024 Income Statement.
- A-12. In the Application's Exhibit I, PAWC calculated its estimated annual revenues and expenses. An itemized breakdown of the estimated revenue is provided at the top of Exhibit I, but a breakdown is not provided for expenses. Please provide an itemized breakdown of the estimated annual expenses that explains the basis of the amounts.
- A-13. In the Application's Section III, Paragraph 19, PAWC indicated that it has been providing water service to the Requested Territories under the Rules and Regulations of PAWC's approved tariff. For each Requested Territory, please provide the date when PAWC began providing water service.
- A-14. In the Application's Section IV, Paragraph 22, PAWC indicated that it will continue to charge its Rate Zone 1 rates for service in the Requested Territories as set forth in its water tariff. However, PAWC's water tariff, Page 9 does not appear to include Gilberton Borough and Ryan Township. Please provide a copy of a complete *pro forma* tariff supplement that includes proposed tariff changes to incorporate a portion of Gilberton Borough and a portion of Ryan Township into PAWC's water tariff.
- A-15. Please explain how Application approval would benefit PAWC's existing customers.
- A-16. For each Requested Territory, please explain how PAWC's customers receive wastewater service.
- A-17. The Commission's Secretarial Letter dated April 7, 2025, served at this docket, directed PAWC to serve copies of the Application on any municipal authority which provides water service to the public and whose service area abuts or is within one mile of the service area proposed in the Application. Also, the Application's Section III, Paragraph 12 indicated that Area 3 is partially supplied by the SCMA Interconnection and Area 4 is only supplied by the SCMA Interconnection. Thus, it appears that SCMA provides water service to PAWC in a service area that abuts or is within one mile of these Areas. Please provide evidence that PAWC served a complete copy of the Application on SCMA, or state that the location of the SCMA Interconnection is more than one mile from Requested Territory Areas 3 and 4.

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- A-18. On April 7, 2025, PAWC was served a Secretarial Letter, directing it to publish the notice enclosed with the Secretarial Letter once a week for two consecutive weeks in a newspaper having a general circulation in the area involved and file proof of publication with the Commission on or before May 5, 2025. On May 5, 2025, PAWC filed a Certificate of Service that indicated in the cover letter that PAWC had not yet received the proof of publication from the *Republican Herald* and that it would provide proof of publication as soon as PAWC received it. However, PAWC has not yet filed proof of publication at this docket. Please file PAWC's proof of publication at this docket.