



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

IN REPLY PLEASE
REFER TO OUR FILE

June 9, 2025

Docket No. A-2025-3054374
Utility Code 230073

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 – Wastewater Division for approval to begin to offer, render, furnish or supply wastewater service to the public in an additional portion of West Caln Township, Chester County, Pennsylvania at Docket No. A-2025-3054374

Dear Attorney Fure:

On April 1, 2025, Pennsylvania-American Water Company – Wastewater Division (PAWC-WD) filed the above-referenced 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 efile account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efile 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:

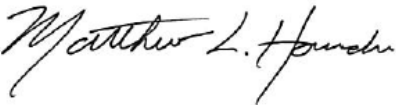
I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made 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 application, please send a copy of your response to Clinton McKinley in the Water/Wastewater Section of the Bureau of Technical Utility Services, via e-mail, at cmckinley@pa.gov. 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. In Section III, Paragraph 10 of the Application, PAWC-WD indicated that the customers within the requested service territory would generate a wastewater flow of approximately 3,925 gallons per day (GPD). However, the copy of the Official Sewage Facilities Plan Revision approval letter (Approval Letter) from the Department of Environmental Protection (DEP), provided as the Application's Exhibit P, indicated that the properties within the requested service territory will generate a total of 5,849.1 GPD. Please explain why PAWC-WD's projection of wastewater flow stated in the Application differs from the flow identified in the DEP Approval Letter.
- A-2. Please provide a copy of the Sewerage Facilities Plan Special Study for 309-317 West Kings Highway Sewer Extension referenced in Section V, Paragraph 23 of the Application.
- A-3. The letters requesting wastewater service provided in the Application's Exhibit F indicated that the properties within the requested service territory include a restaurant, an apartment, a laundromat, and a single-family residence. Separately, DEP's Approval Letter indicated that a dog grooming business is on one of the properties. However, a footnote on Page 8 of the Application indicated that the requested service territory will include two commercial and one residential customer. Additionally, in the Application's Exhibit L, Projected Revenues and Expenses for the Applied for Service Territory, PAWC-WD projected revenue and expenses for two commercial and one residential customer. Please provide responses to the following:
 - a. Quantify the number of customers, by customer class, within the requested service territory; and
 - b. If the number of customers or class of customers within the requested service territory differs from the projected number of customers, by customer class, identified on Exhibit L, provide a revised Exhibit L.
- A-4. Please clarify if any customer within the requested service territory will be subject to PAWC-WD's Industrial Pretreatment Program.
- A-5. The DEP Approval Letter indicated that a Water Quality Management (WQM) Part II permit would be required for the construction and operation of the proposed low-pressure force main (Main Extension). Please identify the status of this WQM permit and provide copies of any DEP approved WQM permits associated with the Main Extension.

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- A-6. In Section III, Paragraph 11 of the Application, PAWC-WD indicated that the requested service territory will be connected to a gravity sewer main approximately 750-800 feet away (Main Extension). However, the table of estimated quantities, materials, and costs provided in Section III, Paragraph 12 of the Application only identified 440 linear feet of two-inch diameter force main. Additionally, the table does not appear to identify the material type of the proposed main (e.g., polyvinyl chloride, high density polyethylene, concrete, etc.), does not identify quantities, materials, or costs for company-owned service laterals, and only identifies one fitting. Please explain these apparent discrepancies and provide a revised breakdown of Main Extension quantities, materials, and costs.
- A-7. In Section III, Paragraph 10 of the Application, PAWC-WD verified that the Coatesville Wastewater Treatment Facility will have adequate treatment and flow capacity to meet present and future service needs from the requested service territory. Also, in Section III, Paragraph 11 of the Application, PAWC-WD indicated that the main extension would terminate at the pump station located on Mt. Airy Road. Please provide responses to the following:
- a. Provide a copy of the WQM permit for the pump station identified in Paragraph 11 of the Application; and
 - b. Verify that the existing wastewater collection system that would convey wastewater from the requested service territory has adequate capacity to meet present and future needs of existing customers and the customers within the requested service territory; or
 - c. Identify any upgrades to PAWC-WD's existing collection system that would be required to provide adequate wastewater conveyance capacity for existing customers and the customers within the requested service territory, including estimated quantities, materials, and costs, and identify the sources of funds for these costs (e.g., short-term debt, equity, etc.).

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- A-8. In the Application’s Section III, Paragraph 13, PAWC-WD indicated that it is reasonable for PAWC-WD to cover the cost of the Main Extension under Rule H.7 of its Wastewater Tariff, which permits PAWC-WD to deviate from its standard main extension requirements when it is prudent, reasonable, and in the public interest. However, the requests for wastewater service provided as the Application’s Exhibit F indicated that the parties requesting service are willing to enter into a water/sewer line extension agreement as soon as possible and the *pro forma* Offsite Development Marketing Agreement (ODMA) provided as the Application’s Exhibit H, titled “Sewer Main Extension Agreement” indicated that, “Developer is willing and desires to design and construct such extension and desires to bear the cost thereof.” Please provide responses to the following:
- a. Confirm that PAWC-WD is referring to Page 34, Section H, Rule 7 of its effective wastewater tariff; and
 - b. Explain why PAWC-WD is proposing to bear the costs of the proposed main extension, considering the apparent willingness of the entities requesting service to bear the cost of the main extension and PAWC-WD’s provision of a ODMA that reflects the same.
- A-9. Please provide a copy of a revised *pro forma* ODMA that includes PAWC-WD’s proposed terms and conditions for extending service to each applicant in a manner that is consistent with the Application and PAWC-WD’s wastewater tariff (e.g., PAWC-WD agrees to obtain required permits and approvals and to install, own, and operate any additional wastewater facilities needed to serve the property at no cost to the applicant, applicant agrees to apply for wastewater service under PAWC-WD’s wastewater tariff and to be subject to PAWC-WD’s tariff rules and regulations, the parties agree to any other provisions that differ from the standard terms of PAWC-WD’s Sewer Main Extension Agreement or Sewer Main Extension Deposit Agreement, etc.).
- A-10. Please explain why PAWC-WD’s revised *pro forma* ODMA is prudent, reasonable, and in the public interest.
- A-11. The ODMA indicated that the developer will be responsible for all engineering and inspection costs and administrative and legal costs. Please quantify the estimated engineering, inspection, administrative, and legal expenses for the Main Extension and clarify if these expenses were included in the cost estimate provided in Section III, Paragraph 12 of the Application.

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- A-12. Please confirm that PAWC is not affiliated with the prospective customers in the requested service territory.
- A-13. In the Application’s Section III, Paragraph 9, PAWC-WD indicated that “[... the Kings Highway properties in question are connected to an on-site septic system, all of which are failing and will not be suitable for future usage.” Please clarify the number of existing on-lot septic systems to be replaced by public wastewater service and provide evidence that these septic systems are failing and not suitable for a replacement septic system.
- A-14. In the Application’s Section III, Paragraph 15, PAWC-WD indicated that a road opening permit is required, and the Application’s Exhibit P indicated that a WQM permit will be required for a force main. Please provide the estimated cost for these permits and clarify if these costs were accounted for in the breakdown of estimated costs provided in Section III, Paragraph 12 of the Application.
- A-15. Please quantify any capacity reservation and connection fees paid or to be paid by the customers within the requested service territory to PAWC-WD.
- A-16. In the Application’s Exhibit L, PAWC-WD estimated annual revenue and expenses for providing wastewater service in the requested service territory, including an itemized breakdown of the estimated revenue. However, a breakdown of the estimated expenses was not provided. Please provide an itemized breakdown of the estimated annual expenses that explains the basis of the stated amounts.
- A-17. The Application’s Exhibit O appears to consist of a copy of an email from the Chester County Health Department. However, the Application indicated that Exhibit O consisted of a letter from Chester County. Please provide evidence and a statement that the Application is consistent with Chester County’s comprehensive planning.