



VIA E-FILING

June 6, 2025

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

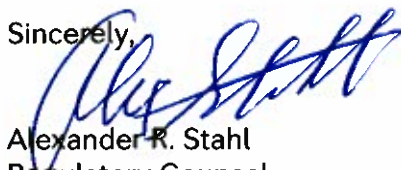
**Re: Application of Aqua Pennsylvania Wastewater, Inc. pursuant to Section 1102 of the Public Utility Code for Approval of its Acquisition of the Wastewater System Assets of Breyer Master Association, Breyer Court Condominium Association, Breyer Woods Condominium Association, One Breyer Estates Condominium Association, and Salus University
Docket No. A-2025-3054123**

Dear Secretary Homsher:

Enclosed please find Aqua Pennsylvania Wastewater, Inc.'s ("Aqua") responses to the Pennsylvania Public Utility Commission's ("PUC" or the "Commission") Bureau of Technical Utility Services ("TUS") Data Request Set 1.

If you have any questions regarding this filing, please contact me at 610-645-1130 or by email at astahl@aquaaamerica.com.

Sincerely,


Alexander R. Stahl
Regulatory Counsel

cc: Certificate of Service
Susan Johnson, Bureau of Technical Utility Services (via email, suejohnso@pa.gov)

Enclosures

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-1 Exhibit BB of the Application at Docket No. A-2019-3008491 consisted of a connection management plan for Cheltenham Township that identified in Page 3 the existence of a surge protection tank system that was apparently owned by the Breyer Townhomes Management Association. Additionally, the water quality management (WQM) permits provided as Exhibit H of this Application identified two-inch diameter and four-inch diameter force mains. However, this Application’s Section III, Paragraph 12 only appears to identify larger diameter mains, manholes, and two pump stations, and does not appear to identify any wastewater service laterals or surge protection tank system as acquired assets. Please provide a detailed breakdown, by major plant category, of the used and useful plant in service to be acquired. The breakdown should fully describe each asset and identify asset sizes, material types, unit quantities, and years of installation.

RESPONSE

Please see the below table

Gravity Mains	Material	Total Lineal Feet	Year
8-inch	Ductile Iron	940	1989-1990
8-inch	PVC	737	1989-1990
8-inch	Terracotta	6,249	1989-1990
10-inch	Ductile Iron	210	1989-1990
10-inch	Terracotta	623	1989-1990
12-inch	Ductile Iron	756	1989-1990
	TOTAL:	9,515	
Force Mains	Material	Total Lineal Feet	Year
2-inch	PVC	18	1989-1990
4-inch	Ductile Iron	510	1989-1990
	TOTAL:	528	
Laterals	Material	Total Lineal Feet	Year
4-inch	PVC	1,190	1989-1990
	TOTAL:	1,190	

Manholes	Material	Count	Year
69	Pre-Cast Concrete ¹	69	1989-1990
	TOTAL	69	

¹ The majority of manholes that the Company has been able to observe are pre-cast concrete, therefore the Company is assuming that the entire system's manholes are pre-cast concrete.

The surge tank is located within the Meetinghouse Road pump station. The Meetinghouse Road pump station was originally designed in 1983, and the Black Cherry Circle Pump Station was designed in 1988. The Company does not have an exact in-service date for these pump stations but estimates that they were operational in the 1989-1990 timeframe.

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

- TUS-A-2** The Application's Exhibit B included a copy of the Asset Purchase Agreement (APA), dated May 29, 2024, by and between Breyer Master Association, Breyer Court Condominium Association, Breyer Woods Condominium Association, One Breyer Estates Condominium Association and Salus University (collectively, Sellers) and APW. Section 1.6(iii) of the APA indicated that APW shall not assume and shall not be liable for any obligations or liabilities imposed on the Sellers under any Corrective Action Plan (CAP) ordered by the Pennsylvania Department of Environmental Protection (DEP), including any CAP or Consent Order and Agreement (COA), by and between the Sellers and DEP. Please provide responses to the following:
- a. Clarify whether any of the Sellers are under a CAP and/or a COA with DEP and provide copies of these documents; and
 - b. If any of the Sellers are under a CAP and/or a COA with DEP, explain how APW intends to address unresolved obligations and liabilities that any of the Sellers have with DEP (e.g., require Sellers to resolve obligations and liabilities before transaction closing, negotiate a new CAP/COA between APW and DEP, etc.).

RESPONSE

- a. The System and Sellers are not subject to a CAP or COA with DEP.
- b. Please see the response to a., above.

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

- TUS-A-3** Schedule 6.2 of the APA indicated that the Meetinghouse Pump Station is not working. Please provide responses to the following:
- a. Describe the repairs required to restore the Meetinghouse Pump Station to operation;
 - b. Provide a detailed cost estimate, by major plant account, of the repairs required to restore operation of the Meetinghouse Pump Station, including a description of asset sizes, material types, and unit quantities;
 - c. Specify the anticipated sources of funds for financing Meetinghouse Pump Station improvements (e.g., short-term debt, equity, etc.).
 - d. Provide an estimated timeline for APW to complete any required repairs to the Meetinghouse Pump Station following the close of this transaction; and
 - e. If APW does not intend to restore the Meetinghouse Pump Station to operation, please describe any DEP permit modifications or amendments required for this change.

RESPONSE

At the time of due diligence, it was noted that the Meetinghouse Pump Station was not working. Upon closing Aqua intends to study system flow to determine if the Meetinghouse Road Pump Station surge tank is still necessary to manage flows in the downstream collection system.

If the surge tank is unnecessary to manage flows, Aqua would decommission the surge tank and allow flow by gravity into Aqua's existing collection system. Aqua would then file an amendment to the existing WQM permit for the Meetinghouse Road Pump Station to revise the description of its operational use.

Estimates of the rehabilitation of the pump station, if required, are included in the projected capital expenditures in response to TUS-A-4. Any funds necessary would be supplied by working capital.

Respondent: Fred P. Gerloff
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-4 In the Application’s Section IX, Paragraph 34(a), APW asserted its fitness to “make improvements to meet continuing and future customer needs.” Please quantify APW’s projected capital improvement expenses for the first five years of its ownership of the Sellers’ wastewater system assets (Sellers’ System), listed by major plant accounts and by year.

RESPONSE

Please see TUS-A-4 Attachment 1.

	System Component	Description	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	TOTAL
1	Electric Service Upgrade	Upgrade Electric Service to 3 Phase (Required for PS upgrades)		\$ 129,500									\$ 129,500
2	Meetinghouse Pump Station Upgrade	Rehab or Replace Existing Pump Station		\$ 26,000	\$ 266,500								\$ 292,500
3	Meetinghouse Pump Station Generator	Install Generator at Meetinghouse PS			\$ 71,000								\$ 71,000
4	Black Cherry Pump Station Upgrade	Rehab or Replace Existing Pump Station					\$ 28,500	\$ 291,000					\$ 319,500
5	Black Cherry Pump Station Generator	Install Generator at Black Cherry PS						\$ 75,000					\$ 75,000
6	GIS Mapping and Manhole Inspection	Mapping and Inspectin of System Manholes	\$ 14,000										\$ 14,000
7	CCTV	CCTV Inspection of Sewer Mains	\$ 20,000										\$ 20,000
8	Collection System Inspection Rehab	Rehabilitation or Replacement of VCP and manholes		\$ 65,000	\$ 67,000	\$ 69,000	\$ 71,000	\$ 73,000	\$ 75,000	\$ 77,500	\$ 79,500	\$ 82,000	\$ 659,000
													\$ -
		TOTALS	\$ 34,000	\$ 220,500	\$ 404,500	\$ 69,000	\$ 99,500	\$ 439,000	\$ 75,000	\$ 77,500	\$ 79,500	\$ 82,000	\$ 1,580,500
	Rolling Total		\$ 34,000	\$ 254,500	\$ 659,000	\$ 728,000	\$ 827,500	\$ 1,266,500	\$ 1,341,500	\$ 1,419,000	\$ 1,498,500	\$ 1,580,500	

Respondent: Fred P. Gerloff
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-5 The Application's Section 14 indicated that the Sellers' System provides wastewater service to 223 customers, including 219 residential and four commercial customers. Please provide a breakdown of the projected number of customers, by customer class, by year, for the next five years.

RESPONSE

The Company does not project any new customers for the next five years to be added to this System.

Respondent: William C. Packer
Fred P. Gerloff
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-6 In the Application's Section V, Paragraph 25, APW indicated annual revenue from the customers served by the Sellers' System in 2024 was \$248,768. However, APW did not provide the estimated annual expenses for the customers served by the Sellers' System in 2024. Please provide the following:

- a. An itemized breakdown of the estimated annual revenue that explains the basis of the 2024 amount identified, by customer class; and
- b. An estimate of the annual expenses APW will incur to provide wastewater service to customers served by the Sellers' System, including an itemized breakdown of the estimated annual expenses that explains the basis of the estimated amounts.

RESPONSE

- a. Breakdown by Class:

Commercial:	\$99,960.92
Residential:	\$148,806.99
Total:	\$248,767.91

- b. The Company estimates annual operations and maintenance expenses of \$58,000 based upon similar costs to operate a collection system with two pump stations. The O&M costs include power, supplies, outside services, and collection system inspection/cleaning.

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

- TUS-A-7** In the Application's Section VII, Paragraph 29, APW provided links to Cheltenham Township's and Montgomery County's Comprehensive Plan Land Use Maps. Also, the Application included Exhibit G-1, Cheltenham Township Comprehensive Plan Map, and Exhibit G-2, Montgomery County Comprehensive Plan Map. Please provide a company verified statement confirming that the Application does or does not meet all the applicable requirements or mandates of the following:
- a. Cheltenham Township's officially adopted comprehensive plan and applicable zoning designations, including any necessary amendments; and
 - b. Montgomery County's officially adopted comprehensive plan, including any necessary amendments.

RESPONSE

The Company has sent the attached letters to Cheltenham Township and Montgomery County and is waiting for a response. Please see TUS-A-7 Attachment 1 and 2.



VIA U.S. MAIL

May 22, 2025

Thom Cross, Chair
Cheltenham Township Planning Commission
8230 Old York Road
Elkins Park, PA 19027

Re: Aqua Pennsylvania Wastewater, Inc. Application to Acquire Wastewater System Assets in Cheltenham Township

Dear Mr. Cross:

Aqua Pennsylvania Wastewater, Inc. ("Aqua") has submitted an Application with the Pennsylvania Public Utility Commission ("PUC") to approve Aqua's acquisition of the wastewater system assets of Breyer Master Association, Breyer Court Condominium Association, Breyer Woods Condominium Association, One Breyer Estates Condominium Association, and Salus University, and the right to offer, render, furnish, or provide wastewater service to the public in Cheltenham Township, Montgomery County, Pennsylvania, at PUC Docket No. A-2025-3054123. Attached is a map showing the area of the system to be acquired in Cheltenham Township.

As part of the application process, Aqua is seeking the Township's input for the purpose of determining if Aqua's Requested Service Territory complies with this Township's land use and Act 537 planning.

Specifically, Aqua requests that the Township reviews the following questions:

1. Are there adopted comprehensive plans for the municipality involved? (Y/N)_____
2. Is there an adopted County comprehensive plan? (Y/N)_____
3. Is there an adopted multi-municipal or multi-county comprehensive plan? (Y/N)_____
4. Is there an adopted County or municipal zoning ordinance or joint municipal zoning ordinance? (Y/N)_____
5. Is the acquisition of this system consistent with these comprehensive plans and/or zoning ordinances? (Y/N)_____
6. Is the acquisition of this system consistent with the municipality's Act 537 Plan? (Y/N)_____

Please fill out the above and sign below, or submit a letter, indicating your responses.

If you have any questions, please call me at (610) 645-1130 or e-mail
astahl@aquaamerica.com.

Sincerely,



Alexander R. Stahl, Esq.
Regulatory Counsel

Enclosure

Aqua Pennsylvania Wastewater, Inc.'s application to acquire the subject system is consistent with the applicable comprehensive plans, zoning ordinances, and Act 537 Plan.

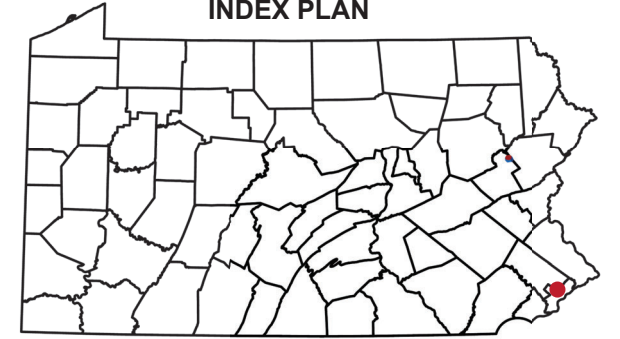
Cheltenham Township Signature _____

Printed Name / Title _____

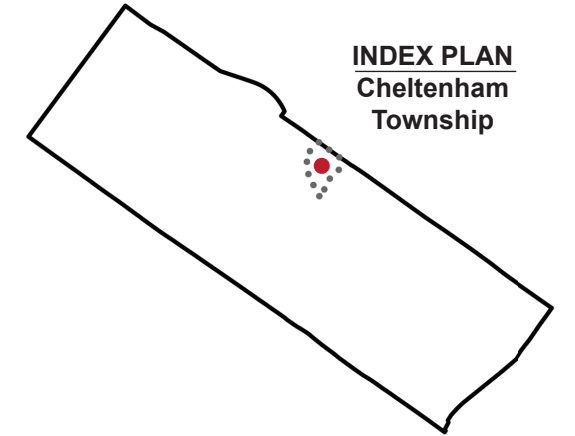
Date _____

Please e-mail this form to: Alexander R. Stahl at astahl@aquaamerica.com.

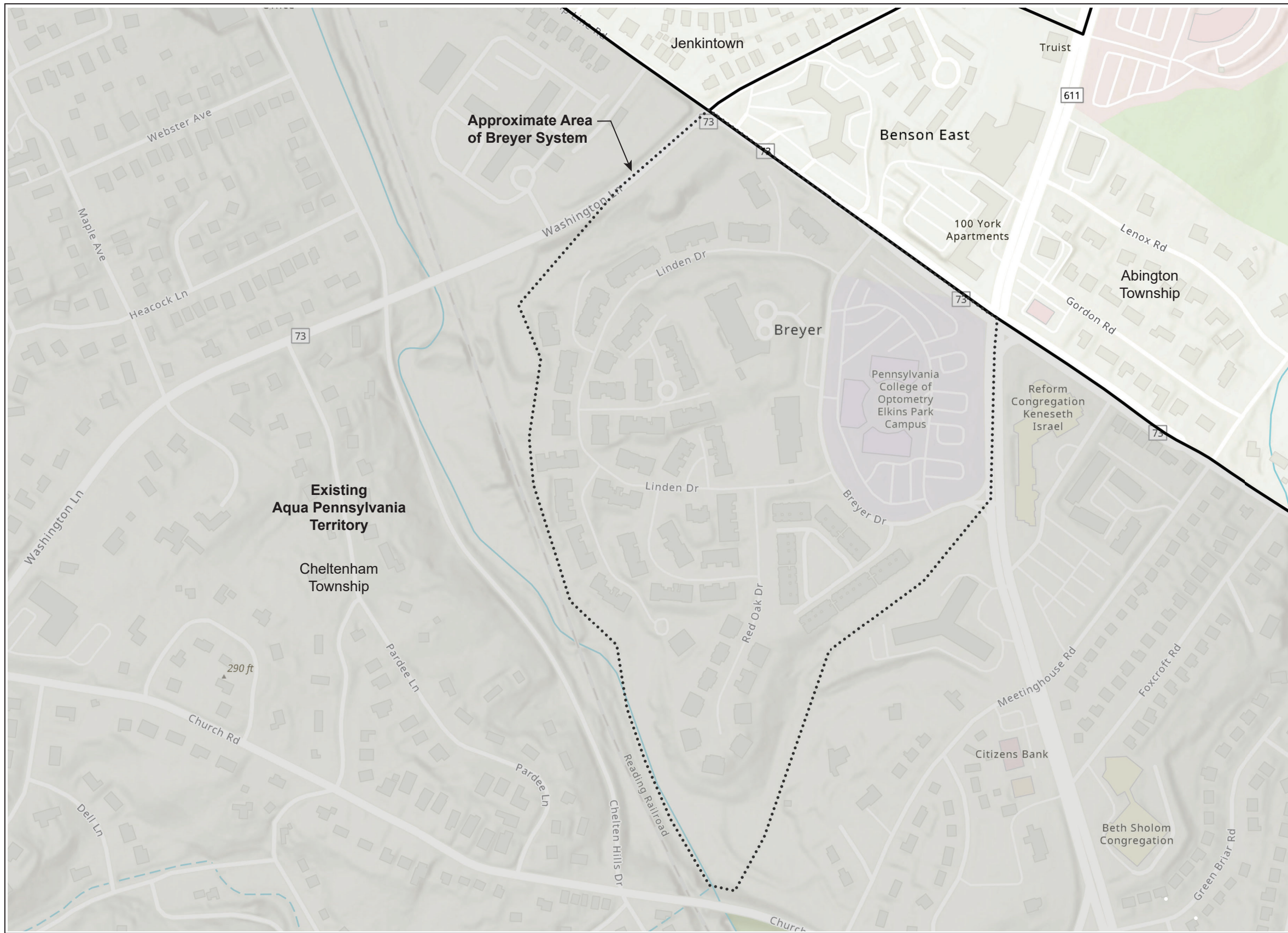
INDEX PLAN



INDEX PLAN
Cheltenham
Township



SCALE IN FEET



Note

Features in this plan including existing infrastructure and parcel shapefiles, obtained from <http://www.pasda.psu.edu/> and Montgomery County GIS, and Aqua Pennsylvania.

REV.	DATE	DESCRIPTION
5.		
4.		
3.		
2.		
1.		

**Breyer Master
Proposed Service Territory**
Cheltenham Township, Montgomery County, Pennsylvania

DATE: 1/17/25	SCALE: 1" = 400 ft	EXHIBIT A
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VIA EMAIL and U.S. MAIL

May 22, 2025

Scott France, Executive Director
Montgomery County Planning Commission
P.O. Box 311
Norristown, PA 19404-0311
planning@montgomerycountypa.gov

Re: Aqua Pennsylvania Wastewater, Inc. Application to Acquire Wastewater System Assets in Cheltenham Township

Dear Mr. France:

Aqua Pennsylvania Wastewater, Inc. ("Aqua") has submitted an Application with the Pennsylvania Public Utility Commission ("PUC") to approve Aqua's acquisition of the wastewater system assets of Breyer Master Association, Breyer Court Condominium Association, Breyer Woods Condominium Association, One Breyer Estates Condominium Association, and Salus University, and the right to offer, render, furnish, or provide wastewater service to the public in Cheltenham Township, Montgomery County, Pennsylvania, at PUC Docket No. A-2025-3054123. Attached is a map showing the area of the system to be acquired in Cheltenham Township.

As part of the application process, Aqua is seeking the County's input for the purpose of determining if Aqua's acquisition complies with this County's land use planning.

Specifically, Aqua requests that the Township reviews the following questions:

1. Are there adopted comprehensive plans for the County involved? (Y/N)_____
2. Is there an adopted multi-municipal or multi-county comprehensive plan? (Y/N)_____
3. Is there an adopted County or joint municipal zoning ordinance? (Y/N)_____
4. Is the acquisition of this system consistent with these comprehensive plans and/or zoning ordinances? (Y/N)_____

Please fill out the above and sign below, or submit a letter, indicating your responses.

Scott France, Executive Director
May 22, 2025
Page 2 of 2

TUS-A-7 Attachment 2

If you have any questions, please call me at (610) 645-1130 or e-mail
astahl@aquaamerica.com.

Sincerely,



Alexander R. Stahl, Esq.
Regulatory Counsel

Enclosure

Aqua Pennsylvania Wastewater, Inc.'s application to acquire the subject system is consistent
with the applicable comprehensive plans and zoning ordinances.

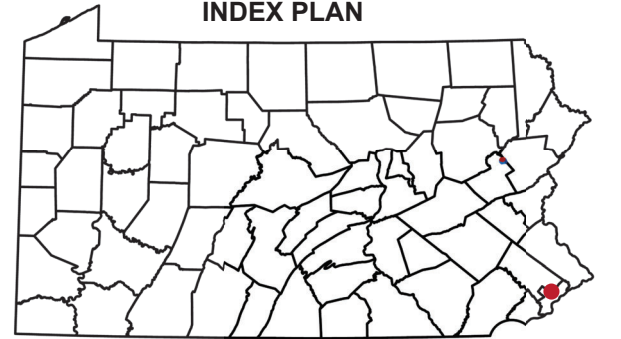
Montgomery County Signature _____

Printed Name / Title _____

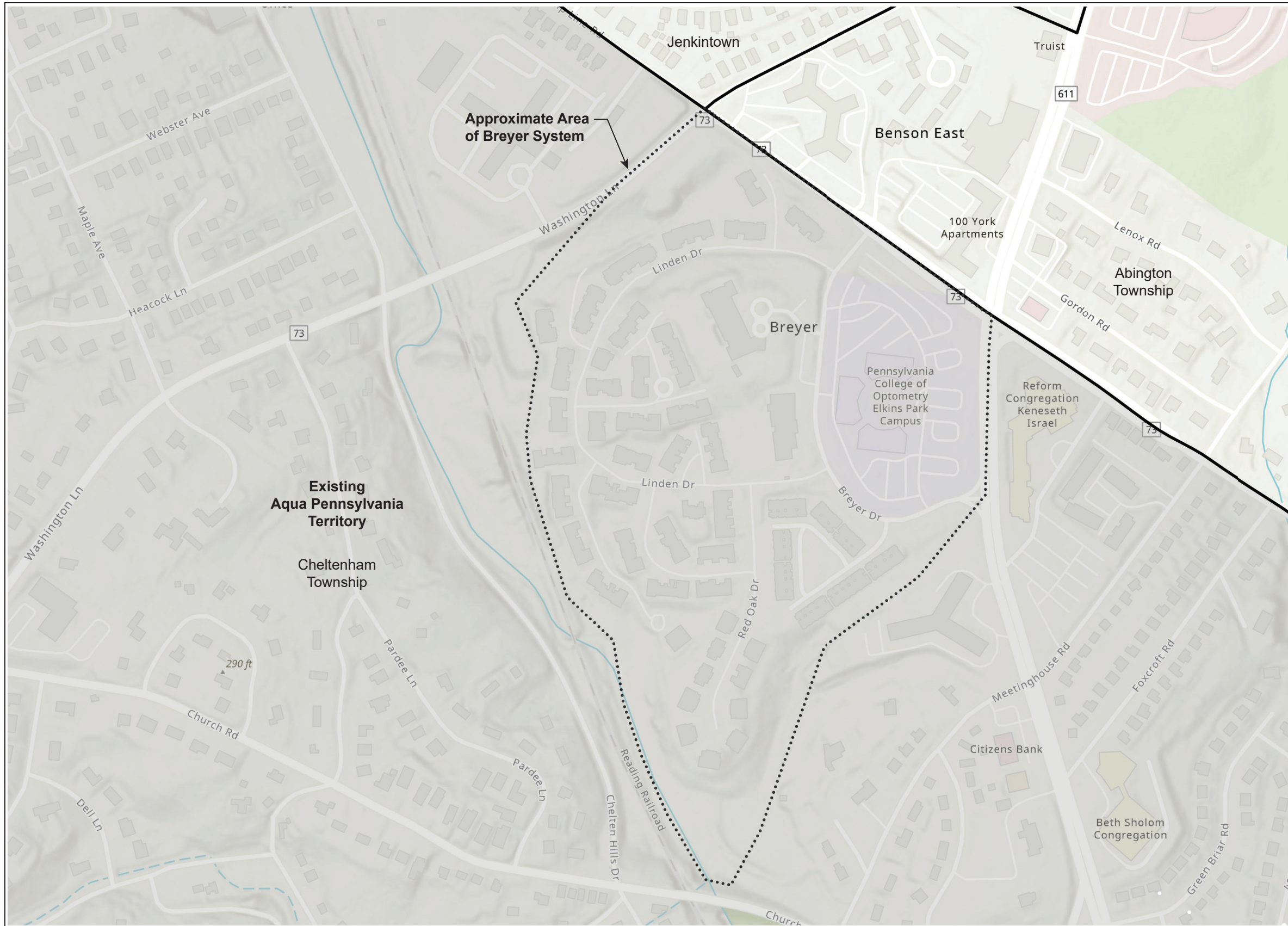
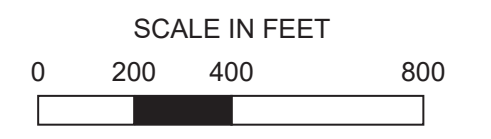
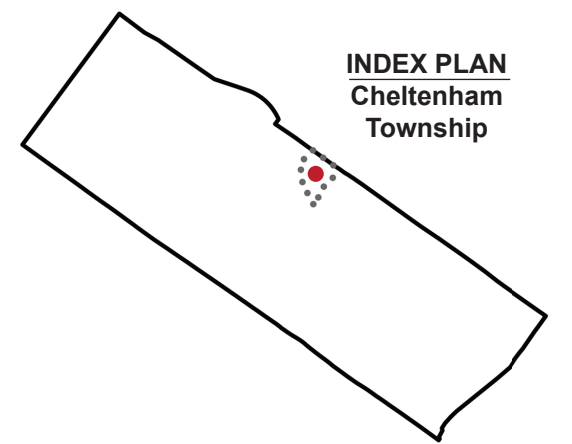
Date _____

Please e-mail this form to: Alexander R. Stahl at astahl@aquaamerica.com.

INDEX PLAN



INDEX PLAN
Cheltenham
Township



Note
Features in this plan including existing infrastructure and parcel shapefiles, obtained from <http://www.pasda.psu.edu/> and Montgomery County GIS, and Aqua Pennsylvania.

REV.	DATE	DESCRIPTION
5.		
4.		
3.		
2.		
1.		

**Breyer Master
Proposed Service Territory**
Cheltenham Township, Montgomery County, Pennsylvania

DATE: 1/17/25 SCALE: 1" = 400 ft EXHIBIT **A**

Respondent: Fred P. Gerloff
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-8 In the Application’s Section VII, Paragraph 30, APW indicated that the Cheltenham system is under a Corrective Action Plan (CAP). However, the CAP was not included in the Application. Also, the Application’s Exhibit I, Aqua 2024 Chapter 94 Report – Cheltenham Township included an Appendix C: Corrective Action Plan Update (2024 CAP Update). However, the 2024 CAP Update stated, “Correction Action Plan Update to be provided later.” Please provide copies of the referenced CAP and the 2024 CAP Update.

RESPONSE

Please see TUS-A-8 Attachment 1.



CHELTENHAM TOWNSHIP

COLLECTION SYSTEM

CAP Semiannual Status Report

March 2025

Section 1: Introduction

Cheltenham Township (Township) is in Montgomery County, to the North and West of the City of Philadelphia, Pennsylvania. The Township is bordered to the south and east by the City of Philadelphia, to the north by Abington Township and Jenkintown Borough and to the west by Springfield Township. The System is comprised of approximately 120 miles of collection system piping serving the following areas:

- Borough of Jenkintown
- Portion of the Township of Springfield
- Portion of the Township of Abington
- Portions of the City of Philadelphia.

The majority of wastewater from these areas is conveyed to the Philadelphia Water Department's (PWD's) Northeast Water Pollution Control Plant (NEWPCP) for treatment and disposal. Wastewater from a small portion of the Township is treated at the Abington Township Wastewater Treatment Plant (WWTP). Figure 1-1 shows the Cheltenham Sewer Collection System with contributing sewersheds in Abington, Jenkintown, Springfield, and the City of Philadelphia.

As a result of ongoing infiltration and inflow (I/I) issues within the Township collection system, the Township, in conjunction with PWD and the Pennsylvania Department of Environmental Protection (PADEP), developed a Correction Action Plan (CAP). The CAP identified a strategy to reduce I/I as well as eliminate sanitary sewer overflows (SSOs) in the system, with the goal of creating system capacity for the connection of new residential and commercial development. The current CAP was implemented in 2017.

In June 2018, an Asset Purchase Agreement between Cheltenham Township and AQUA, Pennsylvania, Inc. (AQUA) was executed and in December 2019, the sale of the Cheltenham Township sewer collection system to AQUA was finalized. Per the sale of the Cheltenham Township sewer collection system to AQUA, AQUA now assumes the responsibility of the CAP. This CAP semiannual report documents and reports on work completed, planned or contemplated and sets goals for future work. AQUA plans to continue with corrective action but additionally plans to utilize new information from modeling and flow metering to improve upon previous efforts by others.

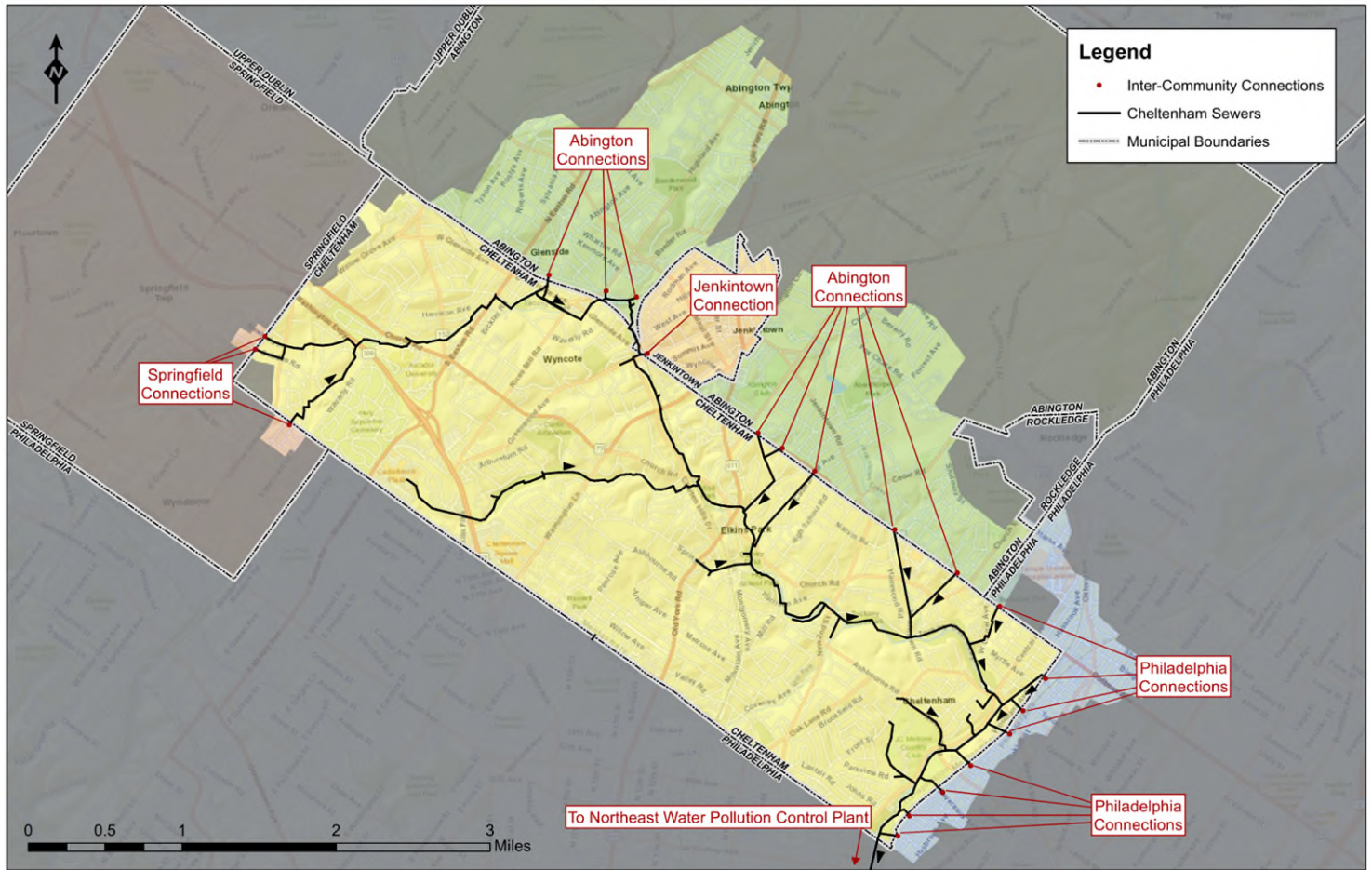


Figure 1-1. Cheltenham Township Sewer Collection System

Section 2: Ongoing CAP Related Activities

The following is a list of overall activities and objectives related to CAP Compliance

1. AQUA In-House Closed-Circuit Television (CCTV) work - *ongoing*
 - a. Aqua uses its own CCTV crew and truck to inspect pipes on a regular basis. The equipment is also used to investigate any issues that may arise.
 - b. Three CCTV personnel obtained National Association of Sanitary Sewer Companies (NASSCO) certification in pipe, manhole and lateral assessment certification program (PACP, MACP and LACP) in late October 2022.
 - c. Aqua uses a GPS unit to locate manholes to further refine and improve the GIS system map.
2. Flow monitoring - *ongoing*
 - a. Fourteen sites under ongoing contract with CSL
 - b. One rain gauge
 - c. Data is shared with PADEP per CSL (metering contractor) online file site
3. I360 Asset Information Database - *ongoing*
 - a. In 2024 the Aqua Engineering Department rolled out a new program in SEPA to store and manage NASSCO PACP and MACP files collected, including the Cheltenham System. The information will be used to prioritize, organize and plan future pipe and manhole rehabilitation projects.
4. Interceptor A Alternatives Analysis - *ongoing*
 - a. An alternatives analysis has progressed towards a short list of alternatives for addressing capacity and wet weather issues in Interceptors A and B.
 - b. Alternatives include current and future flows (based on Chapter 94 projections) across 2 year, 5 year and 10 year storms to support level of service decision making.
 - c. Meetings have been held with Philadelphia Water Department (PWD) modeling, planning and operations staff to discuss ongoing hydraulic analyses being performed by PWD. Aqua and PWD have compared and shared data/assumptions with regards to the modeling of Interceptor A and tributary flows from PWD and found that both the PWD model and the Aqua model are very closely aligned. In September 2024 both parties finalized a Consensus Hydraulic Model which had been vetted and agreed upon. This Consensus model will be used for future design and selection of new joint use conveyance infrastructure.
 - d. PWD and Aqua are in process of memorializing the partnership by developing a Memorandum of Understanding (MOU). The memo, among other things will outline the terms of the partnership and set the framework for executing the project.
 - e. Aqua has been meeting with all stakeholders to discuss the project and options, Abington, Jenkintown, and PWD.
 - f. Aqua is currently working on an updated Act 537 Plan which will include a comprehensive Alternatives Analysis.
 - i. Aqua attended a pre-application meeting with PADEP staff on February 28, 2024 to discuss the contents of an Act 537 Planning Document that would memorialize an alternatives analysis that would address a regional capacity issue.
5. Connection Management Plan – *ongoing*
 - a. Aqua maintains and manages the CMP in close coordination with Cheltenham Township.

- b. Capacity by way of new connections and redevelopment has been looked at within 12-18 month planning windows.
- c. A revised CMP was re-submitted to DEP on January 29, 2025 and is currently under review.

Section 3: Results

RECENT CAPITAL PROJECTS

1. CCTV Inspection Program -2024-2025

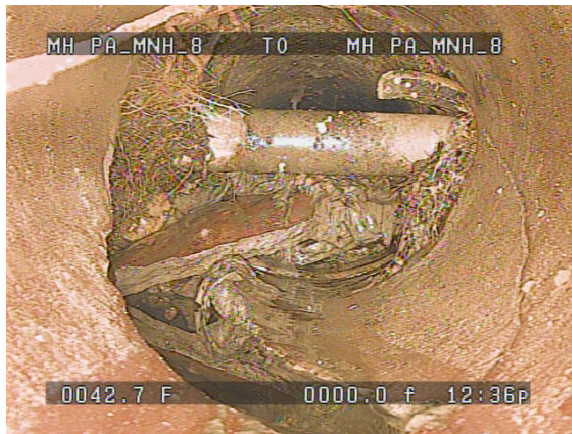
- a. Aqua is currently under contract with Utility Services Group for CCTV main and manhole inspections for the amount of \$1,537,482.50. The project aims to CCTV nearly 400,000 LF of 8-12 inch pipe and inspecting 2,000 manholes. Allowances for root cutting, heavy cleaning and cutting protruding laterals are included.
- b. This new data will be input to Aqua’s existing asset management program and used to plan and schedule future years pipe rehabilitation projects.
- c. Work to date completed (as of 3.28.2025)
 - i. Manhole inspections = 1,606
 - ii. LF of CCTV = 150,478
- d. Notable Items Found to date – In Progress of repair
 - i. Collapsed Main on Rices Mill Road – Several portions of this 8-inch sewer were collapsed within the stretch shown below. This main is currently being replaced.



ii.



- iii.
- iv. PECO Electric Line Cross Bore – 1101 Valley Rd Melrose Park. Aqua repaired the main in March 2025. A claim was filed with PECO.



v.

- 2. **Interceptor B Projects**– as a direct result of Aqua’s inspection program several defects along Interceptor B were identified.
 - a. CIPP Lining in 2024 - COMPLETED
 - 1. Aqua completed CIPP lining of 1,465 LF of 18-inch pipe.
- 3. **Interceptor A** – Ongoing work with PWD has continued to develop a regional solution to resolve the long stating capacity and SSO issues in the lower reach of Interceptor A.
 - a. Recent Efforts Include
 - 1. Meeting with Stakeholders
 - 2. Drafting Act 537 Plan Update
 - 3. Meeting with PWD leadership to develop MOU
 - 4. Meeting with PWD engineering to finalize hydraulic modeling evaluations

Future Activities

Future activities are predicated on the timing and outcome of the current ongoing efforts. That said, the following are anticipated activities:

1. Follow up meetings with PWD to discuss MOU (contractual) and engineering groups (hydraulic modeling)
2. Stakeholder discussions with Abington and Jenkintown regarding their involvement with the Interceptor A project.
3. Continue with ongoing flow monitoring.
4. Continue with ongoing corrective action measures for I/I reduction though the emphasis this year will be to visually inspect the entire sewer collection system. Critical defects identified in these inspections will be addressed immediately.
5. Update Aqua's Geographic Information System (GIS) within Cheltenham Township utilizing the results from the 2024-2025 contract with USG.
6. The next semiannual report will be submitted by September 2024.

Respondent: William C. Packer
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-9 The Application's Exhibit A included a map of APW's Requested Territory. Please quantify the area of the Requested Territory, in acres of land.

RESPONSE

The Company is not requesting additional territory as the territory was granted in Docket A-2019-3008491.

Respondent: William C. Packer
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-10 The requested territory depicted in the Application's Exhibit A appears to already be within APW's certificated service territory as granted in the Commission's Order at Docket No. A-2019-3008491 (Cheltenham Section 1329 Application). Also, the Cheltenham Section 1329 Application's Confidential Exhibit Cheltenham Calendar YE 2018 Customers and Consumption by Class 20190125 included the customers in the Requested Territory. Please clarify whether APW already has been granted the requested territory depicted in the Application's Exhibit A.

RESPONSE

Please see the response to TUS-A-9.

Respondent: Fred P. Gerloff
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-11 Please provide evidence or an averment from APW that the Application is consistent with Cheltenham Township's DEP-approved Act 537 Official Sewage Facilities Plan (Act 537 Plan).

RESPONSE

Please see the response to TUS-A-7 Attachment 1.

Respondent: William C. Packer
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-12 Please provide an estimate of the closing costs for the transaction and identify the sources of funds that will be used to pay for those costs.

RESPONSE

The Company estimates that transaction and closing costs will be approximately \$70,000. The Company will use working capital to pay for closing costs.

Respondent: William C. Packer
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-13 Please provide APW's tentative journal entries, by major plant account, for booking the purchase of the Sellers' System assets in accordance with the National Association of Regulatory Utility Commissioners Uniform System of Accounts applicable to APW.

RESPONSE

Please see Application Paragraph 21 for tentative journal entries.

Respondent: William C. Packer
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-14 Please identify the anticipated closing time frame for the proposed transaction after Commission approval of the Application.

RESPONSE

Subject to any delays, the Company plans to close the proposed transaction soon after the 30 day appeal period runs following the Commission entering an order approving the Company's Application.

Respondent: Fred P. Gerloff
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-15 Please explain how Application approval would benefit APW's customers that are not served by the Sellers' System.

RESPONSE

The System flows into APW's Cheltenham system. Deterioration of the System in terms of wastewater mains would contribute to greater inflow and infiltration ("I&I") that will increase flows ultimately entering the Cheltenham system, thereby increasing operating expenses related to treatment costs. By bringing this system under APW's ownership, the Company can ensure that the system will not fall into disrepair thereby preventing downstream impact to APW's other customers.

Respondent: Fred P. Gerloff
Date: 06/06/2025

APPLICATION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. A-2025-3054123

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-A-16 Please explain how Application approval would benefit APW's customers that are served by the Sellers' System.

RESPONSE

The proposed transaction will allow APW to own and operate a system that is current owned by homeowner's associations that do not have the funding or expertise to operate a wastewater system. This includes possible rehabilitation of pump stations in the system and investigation and rehabilitation/replacement of gravity mains and manholes that have been neglected over the years potentially leading to environmental issues if the proposed transaction is not approved.

VERIFICATION

I, Fred P. Gerloff, Project Engineer III of Aqua Pennsylvania, Inc., hereby state that the facts set forth in Aqua Pennsylvania Wastewater, Inc.'s Responses to the Bureau of Technical Utility Services Data Requests Set 1 in the matter at Docket No. A-2025-3054123, 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).

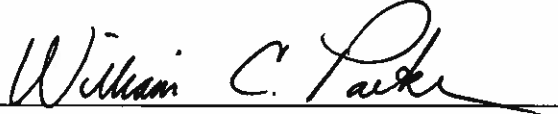
A handwritten signature in black ink, appearing to read "Fred P. Gerloff", written over a horizontal line.

Fred P. Gerloff
Project Engineer III
Aqua Pennsylvania, Inc.

Dated: June 6, 2025

VERIFICATION

I, William C. Packer, Vice President, Rates, Regulatory and Regional Controller of Aqua Pennsylvania Wastewater, Inc., hereby state that the facts set forth in Aqua Pennsylvania Wastewater, Inc.'s Responses to the Bureau of Technical Utility Services Data Requests Set 1 in the matter at Docket No. A-2025-3054123, 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).


William C. Packer
Vice President, Rates, Regulatory and
Regional Controller
Aqua Pennsylvania Wastewater, Inc.

Dated: June 6, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Aqua Pennsylvania :
Wastewater, Inc. pursuant to Section 1102 :
of the Public Utility Code for Approval of :
its Acquisition of the Wastewater System :
Assets of Breyer Master Association, : **Docket No. A-2025-3054123**
Breyer Court Condominium Association, :
Breyer Woods Condominium Association, :
One Breyer Estates Condominium :
Association, and Salus University :

CERTIFICATE OF SERVICE

I hereby certify that I have, this day, served a true and correct copy of the foregoing document upon the persons and in the manner indicated below:

VIA ELECTRONIC MAIL

Rebecca Lyttle
Assistant Small Business Advocate
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
relyttle@pa.gov



Alexander R. Stahl

Dated: June 6, 2025