

June 13, 2025

**Via E-File**

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105

**Re: Application of Aqua Pennsylvania, Inc.  
Docket No. A-2024-3049015**

Dear Secretary Homsher:

On behalf of Aqua Pennsylvania, Inc. (“Aqua”), please accept this filing made in connection with the above-referenced Application, filed with the Commission on April 25, 2025 pursuant to Sections 1102, 1329, and 507 of the Public Utility Code, 66 Pa. C.S. §§ 1102, 1329, and 507, for approvals related to the acquisition by Aqua of the water system assets of the Municipal Authority of the Borough of Greenville (“GWA”). The Bureau of Technical Utility Services is reviewing the Application and asked via letter dated May 14, 2025 that we address certain requests for additional information.<sup>1</sup> Those requests are addressed herein.

Please do not hesitate to contact me if you have any questions.

Sincerely,

  
Courtney L. Schultz

Encls.

Cc: Per Certificate of Service

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<sup>1</sup> Aqua requested an extension of time to respond to these requests on May 23, 2025, which request was granted providing Aqua until June 13, 2025 to respond.

**Information Request No. 1:**

Checklist Item No. 7 – The Application’s Section 62 indicated that Exhibits T1 and T2 included the valuation service agreements and all associated invoices for payment to the Utility Valuation Experts (UVEs). However, it appears that these exhibits only contained the valuation service agreements. Please provide copies of all associated invoices supporting the \$73,030 balance paid to the UVEs.

**RESPONSE:**

Included with this letter are the UVE invoices supporting the balances paid.

**Information Request No. 2:**

Checklist Item Nos. 12 and 18.a. – The Application’s Exhibit H included a copy of Municipal Authority of the Borough of Greenville (GWA) Resolution 01-25, dated February 12, 2025, which identified a rate for customers with a meter size of 5/8 inch x 3/4 inch in the Resolution’s Appendix A. However, the Application’s Exhibit G included a copy of Aqua Pennsylvania, Inc.’s (Aqua’s) *pro forma* tariff supplement (Pro Forma Tariff), which did not include a rate for this meter size. Please provide an amended Pro Forma Tariff containing a rate equal to GWA’s existing rates at the time of acquisition, including rates for customers with a meter size of 5/8 inch x 3/4 inch.

**RESPONSE:**

The 5/8 x 3/4 inch meter size is included in Application Exhibit G under “Multiple Meter Fire Service Customer Charge”.

**Information Request No. 3:**

Checklist Item Nos. 12 and 18.a. – The Application’s Section 30 indicated that GWA provides bulk water truck filling at the WTP under separate individual one-off agreements that are valid only for the single use. Also, the Application’s Exhibit Q included a copy of a document titled, “[GWA] 2023 Water System Annual Report & 2024 Operating Budget” as Exhibit 23, Pages 130-157, which appears to indicate on Page 150 that GWA’s bulk water sale rate is \$9.94 per thousand gallons (billed monthly), metered bulk water use throughout the system is billed with a \$25 minimum, and bulk water obtained at the water treatment plant has a \$5 service fee applied per load unless waived by GWA. Please respond to each of the following:

- a. Provide an amended Exhibit H that includes a copy of GWA’s current rates for bulk water service; and

- b. Provide an amended Pro Forma Tariff containing a rate equal to the seller's existing rates at the time of acquisition, including any bulk water rates of the seller.

**RESPONSE:**

Included with this letter is an updated Pro Forma Tariff (Application Exhibit G) with the bulk rate included. The GWA will be passing a resolution at its next regular or special meeting, and Aqua will provide the resolution as soon as it is available.

**Information Request No. 4:**

Checklist Item Nos. 12 and 18.a. – The Application's Exhibit H included a copy GWA Resolution 01-25, dated February 12, 2025, which identified a PA DEP Safe Drinking Water Fee rate of \$0.30 in the Resolution's Appendix A. However, Aqua's Pro Forma Tariff did not include this rate. Please provide an amended Pro Forma Tariff containing a rate equal to GWA's existing rates at the time of acquisition, including any PA DEP Safe Drinking Water Fee rate of the seller

**RESPONSE:**

Included with this letter is the GWA resolution confirming that the PA DEP Safe Drinking Water Fee will be eliminated at the time of closing.

**Information Request No. 5:**

Checklist Item No. 14.c. – The Application's Exhibit Y, Direct Testimony of William C. Packer, Page 27 indicated that at least two public meetings were held by GWA prior to signing the Asset Purchase Agreement (APA) in September 2023, and that because the public meetings were held before the entry of the Commission's 2024 Final Supplemental Implementation Order (FSIO), response to public input was not required at the time of those hearings. However, Checklist Item No. 14.c. requires that the Applicant identify in buyer direct testimony the ways in which the buyer has responded to input received at the public hearings referenced in Checklist Item 26, if any. Please provide revised buyer direct testimony that identifies the ways in which Aqua has responded to the input received at the public hearings referenced in Checklist Item 26, if any. If no input was received at the public hearings, or if Aqua or GWA do not possess a record of the input received at the public hearings, please provide a verified statement to that effect

**RESPONSE:**

Please see the response to Information Request No. 6, which includes the updated Direct Testimony of William C. Packer, Aqua Statement No. 1 (Application Exhibit Y), at page 27.

**Information Request No. 6:**

Checklist Item No. 15.a. – The Application’s Exhibit D included a copy of the Engineering Assessment (Engineering Assessment). The Engineering Assessment did not include the original cost of water meters. However, Exhibit AA, Direct Testimony of Scott Steffy, P.E., Page 4 indicated that the system includes 2,689 active meters. Please provide a revised Engineering Assessment that includes the water meters, and revised UVE valuations and testimony as necessary to reflect the value of the water meters in the GWA system

**RESPONSE:**

Included with this letter are updated copies of the Application, Engineering Assessment (Application Exhibit D), UVE Appraisals (Application Exhibits Q and R, along with updated confidential workpapers), and Direct Testimony: GWA Statement No. 3, Aqua Statement No. 1, Aqua Statement No. 2, and Aqua Statement No. 6.

**Information Request No. 7:**

Checklist Item Nos. 15.b. and 24.d. – The Engineering Assessment, Attachment 1 – Asset Inventory, Account No. 303 Land and Land Rights included approximately 40 easements. However, Schedule 4.09 of the APA, included as the Application’s Exhibit B, listed approximately 105 easements. Please provide a revised APA and/or Engineering Assessment to correct this discrepancy.

**RESPONSE:**

Please see the response to Information Request No. 6, which includes an updated Engineering Assessment (Application Exhibit D).

**Information Request No. 8:**

Checklist Item No. 19.c. - The Application’s Exhibit K included a copy of GWA’s 2023 Annual Report filed with the Commonwealth’s Department of Community and Economic Development (DCED). However, Checklist Item No. 19.c. requires a copy of the seller’s most recent annual report filed with DCED. Please provide a copy of GWA’s 2024 Annual Report filed with DCED

**RESPONSE:**

Included with this letter is GWA’s 2024 DCED Annual Report.

**Information Request No. 9:**

Checklist Item No. 23.a. – Aqua’s response for Application Checklist Item No. 23 specified that the Application’s Page 7 included a verification statement that water sources and customers are metered in accordance with 52 Pa. Code § 65.7. However, the Application’s Pages 7-8 only included a verification that all customers are metered, and Aqua did not verify that water sources are metered. Please provide a verification statement that water sources and customers are metered in accordance with 52 Pa. Code § 65.7.

**RESPONSE:**

Included with this letter is a verified statement that all customers are metered.

**Information Request No. 10:**

Checklist Item No. 26.a. – Aqua’s response for Application Checklist Item No. 26.a. identified that the Application’s Page 18 and Exhibit II contained a verification statement that public hearings described the acquisition’s potential rate impacts. However, neither the Application’s Page 18 nor Exhibit II included this verification. Please provide an amended response for Application Checklist Item No. 26.a. to identify the document, section, and page number of either the verification statement that public hearings described the acquisition’s potential rate impacts, or of Aqua’s detailed explanation of why this verification statement is not provided.

**RESPONSE:**

A verification was provided in Application Exhibit II that at least two public meetings were held prior to the execution of the APA. The requirement that the public meetings include a discussion of potential rate impacts was not a requirement at the time the public meetings were held as the Commission’s Final Supplemental Implementation Order (“FSIO”) was entered on July 2, 2024, and the public meetings at which the transaction or the APA were discussed were held on January 31, 2023, April 12, 2023, August 9, 2023, and September 13, 2023, with the signing of the APA on September 26, 2023. The Commission’s FSIO states that “[t]he public hearing, rate impact notice, and default appraisal weight provisions of the 2024 FSIO will go into effect 30 days after the entry of this Order with respect to all acquisitions where an APA has not been executed.” FSIO, at 114. As such, since the APA was executed on August 26, 2023 the public hearing requirement in the FSIO and the checklist is inapplicable to this transaction.

## VERIFICATION

I, William C. Packer, Vice President, Rates, Regulatory & Regional Controller of Aqua Pennsylvania, Inc., hereby state that the facts set forth in the letters of Counsel of Aqua Pennsylvania, Inc., dated June 13, 2025, addressing information requests of the Bureau of Technical Utility Services in the matter at Docket No. A-2024-3049015, 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 &  
Regional Controller  
Aqua Pennsylvania, Inc.

Dated: June 13, 2025

## CERTIFICATE OF SERVICE

I, Courtney L. Schultz, hereby certify that a true and correct copy of the foregoing Deficiency Responses in connection with the above-referenced docket, were served on the following individuals on this 13th day of June, 2025, as indicated below.

### PA PUC – VIA E-FILE

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