



**Erin K. Fure**

Director, Corporate Counsel  
852 Wesley Drive | Mechanicsburg, PA 17055  
Phone: 717-550-1556 | Fax: 717-550-1255  
[erin.fure@amwater.com](mailto:erin.fure@amwater.com)

June 24, 2025

**PUBLIC VERSION**

**VIA ELECTRONIC FILING**

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

**In re: Application of Pennsylvania-American Water Company for Approval of the Right to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of West Caln Township, Chester County, Pennsylvania (Kings Highway) – Docket No. A-2025-3054374**

Dear Secretary Homsher:

In response to your letter dated June 9, 2025, attached for filing is Pennsylvania-American Water Company's responses to Data Request Set II, regarding the above referenced proceeding. Please note that the attachment to Question A-18 is **CONFIDENTIAL** and should be treated as such. The **CONFIDENTIAL** version of this response will be filed on the Commission's SharePoint site. Please note that due to the Commission's efilng system being down, we have served parties these responses, but have not efiled them. When the efilng system is functional we will file these responses accordingly. We respectfully request that our submission be docketed on June 24, 2025.

Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Erin K. Fure".

Erin K. Fure

Enclosures

cc: All Parties on the attached Certificate of Service (*via electronic mail*)  
Clinton McKinley, Bureau of Technical Utility Services (*via electronic mail*)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>Application of Pennsylvania-American Water Company for Approval of the Right to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of West Caln Township, Chester County, Pennsylvania (Kings Highway)</b>	:	
	:	<b>Docket Number</b>
	:	<b>A-2025-3054374</b>
	:	
	:	
	:	

**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving the above-referenced filing upon the people and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

**SEND VIA ELECTRONIC MAIL ON JUNE 24, 2025**

Darryl A. Lawrence, Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923

NazAarah Sabree, Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101

Alison Kaster, Director  
Pennsylvania Public Utility Commission  
Bureau of Investigation and Enforcement  
400 North Street  
PO Box 3265  
Harrisburg, PA 17105

Respectfully Submitted,



Erin K. Fure, Esquire (PA ID #312245)  
Pennsylvania-American Water Company  
852 Wesley Drive  
Mechanicsburg, PA 17055  
Phone: (717) 550-1574  
Email: [erin.fure@amwater.com](mailto:erin.fure@amwater.com)

**Attorney for Pennsylvania-American  
Water Company**

**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**

**Docket No. A-2025-3054374  
Set II**

**A-18**      **The Application’s Confidential Exhibit G consisted of a copy of PAWC-WD’s 2023 Chapter 94 Municipal Wasteload Management Annual Report (Chapter 94 Report) for its Coatesville Wastewater Treatment Plant and collection system (Coatesville System). Exhibit G, Page 9, Section 1.1 indicated that PAWC-WD is required to update its Connection Management Plan (CMP) and Corrective Action Plan (CAP) twice per year, in March and October. Please provide the following**

- a.      A copy of PAWC-WD’s most recent Chapter 94 Report filed with DEP for its Coatesville System;**
- b.      Copies of the March 2025 update to PAWC-WD’s CMP and CAP for its Coatesville System; and**
- c.      A statement confirming that the proposed connections within the requested service territory are permitted under PAWC-WD’s CMP and CAP for its Coatesville System.**

**Response:**

- a.      Attached at **A-18\_Attachment** is the Chapter 94 Report which was filed in March 2025.**
- b.      The March 2025 CMP update is included with **CONFIDENTIAL A-18\_Attachment**.**
- c.      The proposed connections are consistent with the CMP and CAP for the Coatesville System. The connections are not specifically listed but will be tracked in the “miscellaneous” row.**

**Responsible Witness:      Gerald A. DeBalko, P.E. – Engineering Manager –  
Southeastern PA  
Pennsylvania-American Water Company**

**Date:                              June 24, 2025**

**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**

**Docket No. A-2025-3054374  
Set II**

**A-19. In Section III, Paragraph 7 of the Application, PAWC-WD indicated that the requested service territory consists of approximately 2.6 acres of land. However, the map depicting the boundaries of the requested service territory provided in Confidential Exhibit B-1 indicated that the requested service territory consists of approximately 3.25 acres of land. Please clarify this discrepancy, quantify the area of the requested service territory in acres, and correct any Application exhibits necessary.**

**Response:** The service territory in **CONFIDENTIAL** Exhibit B-1 is correct. GIS Software is a more exact calculation of acreage and is correct. The service territory requested is 3.25 acres of land.

**Responsible Witness: Jason T. Cowell, GIS Manager  
Pennsylvania-American Water Company**

**Date: June 24, 2025**

## VERIFICATION

I, Gerald A. DeBalko, P.E., hereby state that the facts above set forth above 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 made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.

*Gerald De Balko*

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Gerald A. DeBalko, P.E., Engineering Manager - Southeast  
Pennsylvania American Water Company

Dated: 6/24/2025

## VERIFICATION

I, Jason T. Cowell., hereby state that the facts above set forth above 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 made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.



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Jason T. Cowell, GIS Manager  
Pennsylvania American Water Company

Dated: 6-24-25