



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

IN REPLY PLEASE
REFER TO OUR FILE

June 27, 2025

Docket No. A-2025-3054123
Utility Code 230240

ALEXANDER R STAHL ESQUIRE
AQUA PENNSYLVANIA WASTEWATER INC
762 WEST LANCASTER AVE
BRYN MAWR PA 19010
ASTAHL@AQUAAMERICA.COM

RE: Application of Aqua Pennsylvania Wastewater, Inc. for approval of: (1) Aqua Pennsylvania Wastewater, Inc.'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 (2) the right, *nunc pro tunc*, to begin to offer, render, furnish or supply wastewater service to the public in a portion of Cheltenham Township, Montgomery County, Pennsylvania at Docket No. A-2025-3054123

Dear Attorney Stahl:

On March 21, 2025, Aqua Pennsylvania Wastewater, Inc. (APW) 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 efilings with the Secretary of the Commission by opening an efilings account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings 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:

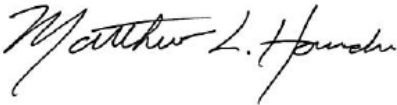
I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made 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 3

- 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
- Rebecca Lyttle, Office of Small Business Advocate (w/enclosure), relyttle@pa.gov
- Allison Kaster, Bureau of Investigation & Enforcement (w/enclosure), akaster@pa.gov

TUS Data Request Set 3

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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-18. Data Request A-7 asked that APW provide a statement confirming that the Application does or does not meet all the applicable requirements or mandates of Cheltenham Township's officially adopted comprehensive plan and applicable zoning designations, including any necessary amendments and Montgomery County's officially adopted comprehensive plans, including any necessary amendments. APW's response to Data Request A-7 provided land use compliance verification request letters from APW to Cheltenham Township and Montgomery and that indicated that APW is waiting for responses as Attachment 1. Please provide either:
- a. Copies of responses to APW's land use compliance verification form letters from Cheltenham Township and Montgomery County; or
 - b. A verified statement from APW confirming that the Application does or does not meet all the applicable requirements or mandates of the following:
 - i. Cheltenham Township's officially adopted comprehensive plan and applicable zoning designations, including any necessary amendments; and
 - ii. Montgomery County's officially adopted comprehensive plan, including any necessary amendments.
- A-19. Data Request A-10 asked APW to clarify whether APW already has been granted the requested territory depicted in the Application's Exhibit A, a map of APW's requested territory. APW's response to Data Request A-10 indicated that it is not requesting additional territory as the territory was granted in Docket No. A-2019-3008491. Please confirm that APW seeks to withdraw its request for approval of the right, *nunc pro tunc*, to begin to offer, render, furnish or supply wastewater service to the public in a portion of Cheltenham Township, Montgomery County, Pennsylvania.
- A-20. Data Request A-11 asked that APW 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). APW's response to Data Request A-11 referenced the response to Data Request A-7 Attachment 1, which provided a land use compliance verification request letter from APW to Cheltenham Township. Please provide either:
- a. A copy of a DEP approval letter evidencing the Application is consistent with Cheltenham Township's DEP-approved Act 537 Plan; or

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- b. A verified statement from APW confirming that the Application is consistent with Cheltenham Township's DEP-approved Act 537 Plan.