



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

IN REPLY PLEASE
REFER TO OUR FILE

July 7, 2025

Docket No. A-2025-3054442
Utility Code 212285

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 for approval, *nunc pro tunc*, of the right to offer, render, furnish, and supply water service to the public in additional portions of Gilberton Borough and West Mahanoy, Ryan and New Castle Townships, Schuylkill County, Pennsylvania at Docket No. A-2025-3054442

Dear Attorney Fure:

On April 7, 2025, Pennsylvania-American Water Company (PAWC) 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 efiling with the Secretary of the Commission by opening an efiling account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efiling 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 2

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 2

Application of Pennsylvania-American Water Company for approval, *nunc pro tunc*, of the right to offer, render, furnish, and supply water service to the public in additional portions of Gilberton Borough and West Mahanoy, Ryan and New Castle Townships, Schuylkill County, Pennsylvania at Docket No. A-2025-3054442

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-19. Data Request A-1 asked that PAWC provide individual maps of suitable scale that depict the location or route of PAWC's water facilities, along with the elevations of the major facilities. PAWC's response to Data Request A-1 provided maps of the location or route of PAWC's water facilities, along with the elevations of the major facilities for its existing certified territory and for limited or no water facilities in Areas 1, 2 and 4. Please provide individual maps of suitable scale that depict the location or route of all PAWC's water facilities for the Requested Territory in Areas 1, 2 and 4, along with the elevations of the major facilities, including the route of PAWC's water facilities connecting Area 4 with the Schuylkill County Municipal Authority (SCMA) Interconnection.
- A-20. The Application's Exhibit B-1 provided a map of the applied for service territory. Please provide the following:
- a. Addresses and parcel numbers for existing customers in each Requested Territory; and
 - b. Copies of any proposed customer requests for water service to be provided by PAWC for any addresses and parcel numbers in each Requested Territory that are not existing customers.
- A-21. Data Request A-4 asked that PAWC quantify the area of each Requested Territory. PAWC's response to Data Request A-4 provided an updated total area of 298 acres for the Request Territories. However, the breakdown of each Requested Territory provided in PAWC's response totals 301 acres ($51 + 36 + 113 + 101 = 301$). Please provide a corrected breakdown of the area of each Requested Territory that agrees with the revised total area.
- A-22. Data Request A-5 asked that PAWC provide a detailed breakdown, by major plant category, of the used and useful plant in service constructed in each Requested Territory. PAWC's response to Data Request A-5 provided a detailed breakdown, by major plant category, of the used and useful plant in service constructed in each Requested Territory as Attachment A-5. Attachment A-5 indicated there are seven hydrants in the Laurel Ridge section of Area 3 and one hydrant in the Firemans Road section of Area 3, for a total of eight hydrants. However, in PAWC's response to Data Request A-7, PAWC provided a Revised Exhibit I, Revenue and Expenses for Applied for Service Territory as Attachment A-7. Revised Exhibit I indicated nine public fire hydrant customers and one private fire customer. Please provide the following:
- a. An explanation of this apparent discrepancy in the number of fire hydrants;

TUS Data Request Set 2

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- b. An updated Attachment A-5 specifying whether the hydrants are public or private fire hydrants for each Requested Territory; and
 - c. An updated Revised Exhibit I reflecting the correct number of public fire hydrant and private fire customers, if necessary.
- A-23. Data Request A-6-a asked that PAWC provide a breakdown of the number of customers for each Requested Territory, by customer class. PAWC's response to Data Request A-6-a indicated a total of 78 customers. However, PAWC's breakdown of the number of customers for the Requested Territory totals 77 customers. Please provide a corrected breakdown of the number of customers for each Requested Territory, by customer class or confirm the total number of customers is 77.
- A-24. Data Request A-7 asked that PAWC explain the apparent discrepancy in the number of other public authority customers and, if necessary, provide a revised Exhibit I, Revenue and Expenses for Applied for Service Territory. PAWC's response to Data Request A-7 provided a Revised Exhibit I, indicating 81 total customers. However, this customer count conflicts with the updated customer count given in PAWC's response to Data Request A-6-a. Further, the Revised Exhibit I breakdown does not agree with the customer class breakdown provided in PAWC's response to Data Request A-6-a. Please provide an updated Exhibit I in which the customer count total and customer class breakdown are consistent with the updated breakdown of the number of customers for each Requested Territory, by customer class or the total number of customers provided in response to Data Request A-22.
- A-25. Data Requests A-8-c and A-8-d asked that PAWC clarify the projected average daily and the maximum daily demand for the Center Street WTP and the SCMA Interconnection, by each of the Requested Territories, respectively. PAWC's responses to Data Requests A-8-c and A-8-d indicated the number of services in Areas 1, 2, 3 & 4 to be 10, 1, 59 and 1, respectively. However, PAWC's response to Data Request A-4 indicated the number of customers in Areas 1, 2, 3 & 4 to be 11, 3, 62 and 1, respectively. Please explain this apparent discrepancy and provide updated responses to Data Requests A-4, A-8-c and A-8-d, as necessary.