



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

July 16, 2025

IN REPLY PLEASE
REFER TO OUR FILE

Docket No. A-2025-3055966
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 the approval of the right to offer, render, furnish and supply water service to the public in an additional portion Jackson Township, Butler County, Pennsylvania at Docket No. A-2025-3055966

Dear Attorney Fure:

On June 26, 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 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

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 Marlon Livingston in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at marlolivin@pa.gov. Please also direct any questions to Marlon Livingston at telephone number (717) 787-4386. Thank you in advance for your cooperation.

Sincerely,



Matthew L. Homsher
Secretary

Enclosure: TUS Data Request Set 1

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

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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-1. Please provide a map depicting the route of the proposed water distribution facilities in the requested service territory, including the locations of proposed fire hydrants and the point of the proposed facilities connection with the existing facilities.
- A-2. Section 11 of the Application estimated the total cost of the line extension to be \$646,280. This total omits the \$400,860 in additional facility costs that are identified in Exhibit F-2 under the section labelled as “Gudenkunst Waterline” (Gudenkunst Waterline) and in the Application’s Section 10 as a water main from Rivulet Place along Gudenkenst Road to Leah Street in Phase 5. Please provide the following information for the Gudenkunst Waterline:
- a. Identify the entity that will fund and install the Gudenkunst Waterline;
 - b. Identify the sources of funding for the Gudenkunst Waterline (e.g., developer advances in aid of construction under PAWC’s standard main extension agreement, PAWC internally generated funds, PAWC short-term debt, etc.); and
 - c. Provide a comparison of funding and installation responsibilities for the Gudenkunst Waterline with funding and installation responsibilities for other proposed facilities and explain why any differences are reasonable.
- A-3. The Application’s Exhibits F-1 and F-2 included an estimate of the cost of proposed facilities. However, this estimate did not include water meter quantities, sizes and costs. Please provide the estimated quantities, sizes and costs of water meters to be installed by PAWC in the proposed territory and explain how PAWC will fund meter installation costs (e.g., internally generated funds, short-term debt, etc.).
- A-4. The Application’s Exhibit G consisted of an unexecuted copy of a Public Fire Hydrant Agreement for two public fire hydrants identified in the Application’s Section 14. However, the Application’s Exhibit K included projected revenues for five private fire hydrants. Please provide responses for each of the following:
- a. Reconfirm the entity that will be responsible for monthly charges for the fire hydrants pursuant to PAWC’s effective tariff (e.g., Jackson Township, a homeowner’s association, etc.); and
 - b. If Jackson Township will be responsible for monthly charges for the public fire hydrants pursuant to PAWC’s effective water tariff, provide evidence that Jackson Township has applied to PAWC-WD for service, has agreed to

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pay these charges, or has approved a subdivision plan that includes public fire hydrants.

- A-5. Section 14 of the Application indicated there will be two public fire hydrants installed and maintained by PAWC. However, the Application's Exhibit K omitted public fire hydrants from its Annual Revenue and Expense estimates. Please provide a revised Exhibit K to include the revenue from the public fire hydrants and separately quantify the number of public fire hydrants and the number of private fire hydrants.
- A-6. Please provide a timeline for the installation of the proposed facilities in the requested territory with an estimated completion date by phase and for the Gudenkunst Waterline.
- A-7. Please identify if any permits are required to complete the main extension project. If so, please provide the estimated costs, state if these costs were included in the estimated total project cost, identify the entity responsible for obtaining these permits and applicable sources of funding (e.g., developer advances, internally generated funds, short-term debt, etc.).
- A-8. Please provide a copy of the most recent approved subdivision plan for the Development.
- A-9. The Water Facilities Line Extension Agreement (Line Extension Agreement), provided as the Application's Exhibit E, indicated in Paragraph 14 "The per customer refund, for a residential customer, shall be determined as follows: for each street service connection made for a residential customer, the refund will be three times the average annual revenue of a residential customer." Please provide an estimate of the refund to be paid by PAWC to the Developer for the residential customers.
- A-10. Please explain how Application approval would benefit existing ratepayers.
- A-11. Please specify how areas in the requested territory that are outside of the Development will receive wastewater service (e.g., existing properties along the trace of the Gudenkunst Waterline).
- A-12. The Application's Exhibit L included copies of Jackson Township Land Use Letters for the Development's Phase 1B dated October 23, 2024, and the Development's Phases 3, 4 and 5 dated July 31, 2024. However, the Application's requested territory appears to include an area along Gudekunst Road outside of the Development, and PAWC did not provide copies of letters from Jackson Township or Butler County indicating whether the Application (i.e., PAWC's requested territory area outside of the Development) is consistent with adopted municipal and county comprehensive plans and zoning ordinances. Please provide responses for each of the following:

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- a. Provide evidence that PAWC sent land use planning consistency verification letters to Jackson Township and Butler County that requested confirmation of whether the Application is consistent with adopted county and municipal comprehensive plans and zoning designations;
- b. Provide copies of responses to PAWC's land use planning consistency verification letters from Jackson Township and Butler County; and
- c. If responses to PAWC's letters have not been provided by Jackson Township or Butler County, provide verification of whether the Application is consistent with adopted county and municipal comprehensive plans and zoning ordinances.