



Erin K. Fure
Director, Corporate Counsel
852 Wesley Drive | Mechanicsburg, PA 17055
Phone: 717-550-1556 | Fax: 717-550-1255
erin.fure@amwater.com

July 30, 2025

VIA ELECTRONIC FILING

PUBLIC VERSION

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

In re: Application of Pennsylvania-American Water Company for Certificate of Public Convenience for Approval of the Right to Offer, Render, Furnish and Supply Water Service to the Public in Additional Portions of West Mahanoy Township, Schuylkill County, Pennsylvania, Gilberton Borough, Schuylkill County, Pennsylvania, Ryan Township, Schuylkill County, Pennsylvania, and New Castle Township, Schuylkill County, Pennsylvania - *Nunc Pro Tunc*
Docket No. A-2025-3054442

Dear Secretary Homsher:

In response to your Secretarial Letter of July 7, 2025, please find attached Pennsylvania-American Water Company's Responses to Set II Data Requests. Please note that some attachments are **CONFIDENTIAL** and should be treated as such.

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

Sincerely,

A handwritten signature in blue ink that reads "EK Fure".

Erin K. Fure

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

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania-American Water Company for Certificate of Public Convenience for Approval of the Right to Offer, Render, Furnish and Supply Water Service to the Public in Additional Portions of West Manahoy Township, Schuylkill County, Pennsylvania, Gilberton Boro, Schuylkill County, Pennsylvania, Ryan Township, Schuylkill County, Pennsylvania, and New Castle Township, Schuylkill County, Pennsylvania - <i>Nunc Pro Tunc</i>	:	Docket Number A-2025-3054442
--	---	---------------------------------

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of July, 2025 the above-referenced Responses upon the people, via electronic mail, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

SERVED VIA ELECTRONIC MAIL ON JULY 30, 2025

Darryl A. Lawrence, Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
(via electronic mail)

NazAarah Sabree, Small Business Advocate
Office of Small Business Advocate
555 Walnut Street
1st Floor, Forum Place
Harrisburg, PA 17101
(via electronic mail)

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

Respectfully Submitted,



Erin K. Fure, Esquire (PA ID #312245)
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
Phone: (717) 550-1556
Email: erin.fure@amwater.com

**Attorney for Pennsylvania-American Water
Company**

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

Docket No. A-2025-3054442

PAWC's Responses to TUS Set II

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.

Response: Please see **CONFIDENTIAL TUS A-19_Attachment**.

Responsible Witness: **Mallory Weakland, GIS Supervisor
Pennsylvania-American Water Company**

Date: **July 30, 2025**

**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**

Docket No. A-2025-3054442 - PAWC's Responses to TUS Set II

CONFIDENTIAL

TUS A-19 Attachment

MAP OF APPLIED FOR SERVICE TERRITORY OF AREAS 1 THROUGH 4

CONFIDENTIAL

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

Docket No. A-2025-3054442

PAWC's Responses to TUS Set II

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.

Response:

- a. See, **CONFIDENTIAL A-20-a_Attachment**
- b. See, **CONFIDENTIAL A-20-b_Attachment**

Responsible Witness: **Mallory Weakland, GIS Supervisor
Pennsylvania-American Water Company (subpart a)**

**Bradley M. Sauers, Sr. Supervisor – Operations -
Berwick/Frackville
Pennsylvania-American Water Company (subpart b)**

Date: **July 30, 2025**

**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**

Docket No. A-2025-3054442 - PAWC's Responses to TUS Set II

CONFIDENTIAL

TUS A-20-a Attachment

LIST OF CUSTOMERS AND PREMISE NUMBERS

CONFIDENTIAL

**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**

Docket No. A-2025-3054442 - PAWC's Responses to TUS Set II

CONFIDENTIAL

TUS A-20-b Attachment

APPLICATION TO REQUEST SERVICE

CONFIDENTIAL

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

Docket No. A-2025-3054442

PAWC's Responses to TUS Set II

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.

Response: The correct breakdown is 301 acres and is shown above. See, **CONFIDENTIAL TUS-A-19_Attachment**.

Responsible Witness: **Mallory Weakland, GIS Supervisor
Pennsylvania-American Water Company**

Date: **July 30, 2025**

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

Docket No. A-2025-3054442

PAWC's Responses to TUS Set II

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;
- 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.

Response:

- a. One fire hydrant was forgotten on Morea Road.
- b. Please see **Revised A-5_Attachment**
- c. Please see **Revised Exhibit I at TUS-A-22_Attachment.**

Responsible Witness: **Bradley M. Sauers, Sr. Supervisor – Operations - Berwick/Frackville Pennsylvania-American Water Company (subparts a and b)**

Stacey Gress , Director – Rates and Regulatory – American Water Works Service Company

Date: **July 30, 2024**

**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**

Docket No. A-2025-3054442 - PAWC's Responses to TUS Set II

TUS A-22-b Attachment

REVISED TUS-A-5_ATTACHMENT

Frackville TUS Data Request A-5

Gilberton Boro (Area 1)

Quantity	Units	Description	Cost At Install Year	Current Cost	Install Year	
61	LF	N. Nice St. 4" CI Pipe	\$ 64.05	\$ 34.19	1904	*
215	LF	N. Second St. 2" CI Pipe	\$ 141.90	\$ 20.86	1915	
2	EA	1" Corps (N. Nice)	\$ 8.05	\$ 52.21	1904	*
3	EA	1" Corps (N. Second)	\$ 3.93	\$ 52.21	1915	
2	EA	1" Curb Stop (N. Nice)	\$ 6.58	\$ 106.55	1904	*
3	EA	1" Curb Stop (N. Second)	\$ 6.36	\$ 106.55	1915	
2	EA	3/4" Blow off	\$ 2.60	\$ 42.24	1904	*
1	EA	4" Gate Valve	\$ 21.13	\$ 383.52	1944	

West Mahanoy Township (Area 1)

24	LF	4" CI Pipe	\$ 25.20	\$ 820.56	1904	*
109	LF	2" CI Pipe	\$ 71.94	\$ 2,273.74	1915	
2	EA	1" Corp	\$ 3.22	\$ 104.42	1904	*
2	EA	1" Curb Stop	\$ 6.58	\$ 213.10	1904	*

New Castle Township (Area 2)

		No Conveyance Facilities				

Ryan Township (Area 3)

		No Conveyance Facilities				

Laurel Ridge (Area 3)

3895	LF	8" DI Pipe	\$ 57,373.40	\$ 119,966.00	1995	
682	LF	6" DI Pipe	\$ 7,147.36	\$ 14,942.62	1995	
7	EA	Public Hydrant	\$ 5,456.01	\$ 11,410.00	1995	
6	EA	2" Blow off	\$ 563.94	\$ 1,179.42	1995	
95	EA	1" Corp	\$ 2,372.15	\$ 4,959.95	1995	
95	EA	1" Curb Stob	\$ 4,012.80	\$ 4,012.80	1995	
11	EA	6" Gate Valve	\$ 2,575.87	\$ 5,386.92	1995	
18	EA	8" Gate Valve	\$ 13,062.42	\$ 13,062.42	1995	
4	EA	8"x6" Tee	\$ 577.40	\$ 1,207.56	1995	
1	EA	6" Flow Meter	\$ 1,331.71	\$ 2,785.00	1995	
4	EA	4" Gate Valve	\$ 1,534.08	\$ 1,534.08	1995	
5	EA	Sample Stations			Unknown	
1	EA	8X8 Tap Sleeve	\$ 149.89	\$ 313.47	1995	

Frackville TUS Data Request A-5

Firemans RD (Area 3)						
1612	LF	12" DI	\$ 25,276.16	\$ 63,013.08	1990	
2	EA	12" Gate Valve	\$ 1,363.24	\$ 2,850.96	1990	
1	EA	6" Gate Valve	\$ 571.68	\$ 578.41	1990	
1	EA	Public Hydrant	\$ 653.70	\$ 1,630.00	1990	
1	EA	2" Blow off	\$ 78,383.00	\$ 196.57	1990	
5	EA	1" Corp	\$ 104.70	\$ 261.05	1990	
5	EA	1" Curb Stop	\$ 84.70	\$ 211.20	1990	
1	EA	12"x12" Tee	\$ 249.88	\$ 623.08	1990	

Morea Rd (Area3)

1187	LF	12" DI Pipe	\$ 23,609.43	\$ 46,399.83	1998	
4	EA	12" Gate Valve	\$ 2,900.60	\$ 5,701.92	1998	
2	EA	1" Corp	\$ 53.12	\$ 104.42	1998	
2	EA	1" Curb Stop	\$ 42.98	\$ 84.48	1999	
1	EA	Public Hydrant	\$ 820.54	\$ 1,613.00	1998	

Power Plant (Area 4)

		No Conveyance Facilities				

All cost values were generated using U.S. Bureau of Labor Statistics CPI Inflation Calculator

* Cost values are valuated at 1913 inflation rates for Cost at Year Installed.

**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**

Docket No. A-2025-3054442 - PAWC's Responses to TUS Set II

TUS A-22 Attachment

REVISED EXHIBIT I – REVENUES AND EXPENSES

**Estimated Annual Revenue and Expense
in Application Territory
Water**

Line No.		60 Residential Customers	1 Municipal Customer	2 Commercial Customers	5 Commercial Customers	1 Commercial Customer	1 Commercial Customer	1 Commercial Customer	9 Public Fire Hydrants	1 Private Fire (Unmetered)	Total	Line No.
1	Estimated Annual Revenue											1
2												2
3	Meter Size	5/8"	5/8"	5/8"	1"	2"	3"	4"		4"		3
4	Monthly Service Charge	\$18.80	\$19.30	\$19.30	\$48.40	\$127.10	\$236.90	\$296.90	\$22.86	\$61.49		4
5	Average Monthly Usage (100 Gallons)	32.01	7.13	4.42	114.23	133.00	367.86	15.29				5
6	Usage Charge per 100 Gallons (first 16,000 gallons)	\$1.8772	1.8988	1.8033	1.8033	1.8033	1.8033	1.8033				6
7	Usage Charge per 100 Gallons (all in excess of 16,000 gallons)						1.3523					7
8	Usage Charge (first 16,000 gallons)	\$60.09	\$13.54	\$7.97	\$206.00	\$239.84	\$288.53	\$27.57				8
9	Usage Charge (all in excess of 16,000 gallons)						\$281.09					9
10	Monthly Total Revenue	<u>\$78.89</u>	<u>\$32.84</u>	<u>\$27.27</u>	<u>\$254.40</u>	<u>\$366.94</u>	<u>\$806.52</u>	<u>\$324.47</u>	<u>\$22.86</u>	<u>\$61.49</u>		10
11	Annual Total Residential Revenue (Ln. 10 x 12 months), 60 cust.	\$56,800.80									\$56,801	11
12	Annual Total Municipal Revenue (Ln. 10 x 12 months), 1 cust.		\$394.08								\$394	12
13	Annual Total Commercial Revenue (Ln. 10 x 12 months), 10 cust.			\$654.48	\$15,264.00	\$4,403.28	\$9,678.24	\$3,893.64			\$33,894	13
14	Annual Revenue, 9 Public Fire Hydrants								\$2,468.88		\$2,469	14
15	Annual Revenue, Unmetered Private Fire									\$737.88	\$738	15
16												16
17	Total Estimated Annual Revenue										\$94,295	17
18												18
19	Estimated Annual Expenses											19
20												20
21	Estimated Expenses	\$11,451.04	\$79.45	\$131.94	\$3,077.22	\$887.70	\$1,951.13	\$784.96	\$497.73	\$148.76	\$19,010	21
22												22
23	Total Estimated Expenses per Year										\$19,010	23
24												24
25	Net Income (Ln. 17 - Ln. 23)										\$75,285	25

Exhibit I Revised

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

Docket No. A-2025-3054442

PAWC's Responses to TUS Set II

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.

Response: The total correct customers is 75. This was a math error.

**Responsible Witness: Bradley M. Sauers, Sr. Supervisor – Operations -
Berwick/Frackville
Pennsylvania-American Water Company**

Date: July 30, 2025

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

Docket No. A-2025-3054442

PAWC's Responses to TUS Set II

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.

Response: Please see **TUS A-22_Attachment**.

Responsible Witness: **Stacey Gress , Director – Rates and Regulatory –
American Water Works Service Company**

Date: **July 30, 2025**

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

Docket No. A-2025-3054442

PAWC's Responses to TUS Set II

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.

Response: The correct number of customers in Areas 1,2, 3 and 4 are 11, 1, 62 and 1 respectively. Please see **Revised A-8-c and A-8-d Attachment** respectively.

Responsible Witness: **Bradley M. Sauers, Sr. Supervisor – Operations - Berwick/Frackville
Pennsylvania-American Water Company**

Date: **July 30, 2025**

**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**

Docket No. A-2025-3054442 - PAWC's Responses to TUS Set II

REVISED TUS-A-8(c)and (d) ATTACHMENT

REVISED Frackville TUS Data Request A-8 C.

Center Street Plant Demand

	Average use	Number of Services	Average Daily Demand	Maximim Daily Demand
Area 1-	180	11	1980	2700
Area 2-	180	1	180	270
Area 3-	180	0	0	0
Area 4-	180	0	0	0

An average annual rate of use in gallons per capita per day of 180 is common in the US, and the maximum daily demand is usually 150% of the average annual rate.

This is from the text: Integrated Design and Operation of Water Treatment Facilities, Susumu Kawamura.

REVISED Frackville TUS Data Request A-8 D.

SCMA Demand

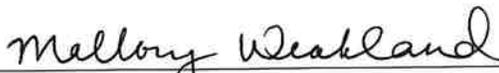
	Average use	Number of Services	Average Daily Demand (GAL)	Maximum Daily Demand (GAL)
Area 1-	180	0	0	0
Area 2-	180	0	0	0
Area 3-	180	62	11,160	13770
Area 4-	180	1	180	270

An average annual rate of use in gallons per capita per day of 180 is common in the US, and the maximum daily demand is usually 150% of the average annual rate.

This is from the text: Integrated Design and Operation of Water Treatment Facilities, Susumu Kawamura.

VERIFICATION

I, Mallory M. Weakland hereby state that the facts 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.



Mallory M. Weakland, GIS Supervisor
Pennsylvania-American Water Company

Dated: 7/29/25

VERIFICATION

I, Brad Sauers, hereby state that the facts set forth above in the attached Data Responses 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.



Brad Sauers, Senior Supervisor Operations
Pennsylvania American Water Company

Dated: 7/29/25

VERIFICATION

I, Stacey Gress, hereby state that the facts above set forth in the attached Data Requests is 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.



Stacey Gress, Director of Rates and Regulatory
American Water Works Service Company

Dated: 7/30/2025