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July 31, 2025

VIA ELECTRONIC FILING


Matthew Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
P.O. Box 3265
Harrisburg, PA 17105-3265

**Re: Petition of Aqua Pennsylvania, Inc., as the Receiver for Venango Water Company
For Approval of the Lead Service Line Replacement Program for Venango Water
Company
Docket No. P-2024-3050248**

Dear Secretary Homsher:

Please find the Joint Petition for Settlement and Statements in Support thereof on behalf Aqua Pennsylvania, Inc., as Receiver for Venango Water Company, the Office of Consumer Advocate, and the Office of Small Business Advocate in the above-referenced proceeding. Copies are being provided as indicated on the Certificate of Service.

Respectfully submitted,



Megan E. Rulli

MER/dmc
Attachment

cc: Honorable Mark A. Hoyer (*via email; w/attachment*)
Certificate of Service

CERTIFICATE OF SERVICE

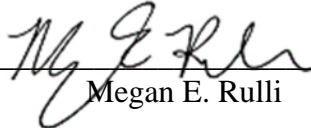
I hereby certify that a true and correct copy of the foregoing has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

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Date: July 31, 2025



Megan E. Rulli

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Aqua Pennsylvania, Inc. as the :
Receiver for Venango Water Company :
For Approval of the Lead Service Line : Docket No. P-2024-3050248
Replacement Program for Venango Water :
Company :

JOINT PETITION FOR SETTLEMENT

TO DEPUTY CHIEF ADMINISTRATIVE LAW JUDGE MARK A. HOYER:

I. INTRODUCTION

Aqua Pennsylvania, Inc. (“Aqua,” or the “Company”), serving as the Receiver for Venango Water Company (“VWC”) and its affiliates Cooperstown Water Company (“CWC”), Fryburg Water Company (“FWC”), Plumer Water Company (“PWC”), Sugarcreek Water Company (“SWC”), and West Hickory Water Company (“WHWC”) (collectively, the “Rhodes Water Utilities”),¹ the Office of Consumer Advocate (“OCA”), and the Office of Small Business Advocate (“OSBA”) (collectively, “Joint Petitioners” or “Parties”) hereby submit this Joint Petition for Settlement (“Settlement”) and respectfully request that Deputy Chief Administrative Law Judge Mark A. Hoyer (the “ALJ”) recommend approval of, and the Pennsylvania Public Utility Commission (“Commission”) approve, the Settlement consistent with the terms and conditions set forth in this Joint Petition for Settlement. In support of the Settlement, the Joint Petitioners state the following:

¹ See Paragraph 3 and Footnote 2, *infra*.

II. BACKGROUND

1. Aqua provides water public utility service to approximately 458,000 water customers in a certificated service territory that spans 32 counties across the Commonwealth of Pennsylvania. Aqua is a “public utility” as that term is defined under the Public Utility Code, 66 Pa. C.S. § 102.

2. VWC is a Class C public utility that owns a water system serving approximately 246 customers in Reno, Venango County, Pennsylvania. VWC does not have an LTIP on file with the Commission and is not authorized to have a Distribution System Improvement Charge (“DSIC”).

3. Aqua was established as Receiver of the VWC system by the Commission’s Ex Parte Emergency Order dated August 11, 2023, and ratified by the Commission’s Ratification Order dated August 24, 2023 at Docket No. M-2023-3042180. Aqua’s Receivership under Section 529 was consolidated in *Venango Water Company – Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. as Receiver; Section 529 Investigation of Venango Water Company; Section 529 Investigation of Sugarcreek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, Cooperstown Water Company and Blaine E. Rhodes Sewer Company*, Docket Nos. M-2023-3042180, I-2023-3042312, and P-2024-3045205, Deputy Chief Administrative Law Judge Mark A. Hoyer First Interim Order (Mar. 20, 2024) (“Section 529 Proceeding”).

4. On July 22, 2024, Aqua, as Receiver for VWC, filed a Petition seeking approval of VWC’s Lead Service Line Replacement (“LSLR”) Program.²

² During the Section 529 Proceeding, Aqua was also established as Receiver of five additional water utilities owned and operated by the owner of VWC, i.e., the Blaine Edwin Rhodes Estate. The water utilities of the Rhodes Utilities include CWC, FWC, PWC, SWC, VWC, and WHWC. The Commission’s October 30, 2024 Opinion and

5. On August 9, 2024, the Office of Small Business Advocate (“OSBA”) filed a Notice of Intervention, Public Statement, and Verification at the above-captioned docket.

6. On August 21, 2024, the Office of Consumer Advocate (“OCA”) filed a Notice of Intervention and Public Statement at the above-captioned docket.

7. A Prehearing Conference Notice and Prehearing Conference Order were issued in this proceeding on August 29 and September 9, 2024, respectively, which scheduled a Prehearing Conference for September 30, 2024.

8. Via email sent to the ALJ on September 9, 2024, the Parties requested that the Prehearing Conference be postponed to allow the Parties time to pursue settlement in this proceeding. The ALJ granted this request, and the Prehearing Conference was canceled on September 16, 2024.

9. On December 17, 2024, the ALJ emailed the Parties asking that the Parties provide him with a status report in this proceeding by January 7, 2025. The Parties submitted status reports on January 8, February 28, and April 1, 2025, which requested additional time to pursue settlement.

10. On June 20, 2025, Aqua submitted a further Status Report on behalf of the Parties, notifying the ALJ that the parties had reached a settlement in principle of all issues and intended to file a Joint Petition for Settlement. The Settlement terms are set forth in the following section.

Order at Docket No. M-2023-3042180, I-2023-3042312, and P-2024-3045205, which adopted Deputy Chief Administrative Law Judge Mark A. Hoyer’s October 17, 2024 Order Granting Petition for Issuance of an Interim Emergency Order on an Expedited Basis and Certifying Material Question to the Commission, stated “[t]hat the Lead Service Line Replacement (LSLR) Plan filed by Aqua Pennsylvania, Inc., as Receiver for the Venango Water Company currently pending at Docket No. P-2024-3050248, shall apply to Sugarcreek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, and Cooperstown Water Company and the requirements of 52 Pa. Code § 65.55(a) shall be waived so that Aqua Pennsylvania, Inc. shall not be separately required to file LSLR Plans for Sugarcreek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, and Cooperstown Water Company.” Ordering Paragraph 18.

III. TERMS AND CONDITIONS OF SETTLEMENT

11. The Rhodes Water Utilities' LSLR Program, as submitted by Aqua as Receiver for VWC, and as applied to all the Rhodes Water Utilities,³ is approved, subject to the following modifications. Aqua, as Receiver, shall be responsible for implementing the Rhodes Water Utilities' LSLR Program until such time when Aqua is neither Receiver nor owner of the Rhodes Water Utilities. If Aqua becomes the owner of the Rhodes Water Utilities at the conclusion of the Section 529 Proceeding, Aqua's LSLR Program will control replacement of lead service lines in the Rhodes Water Utilities service territory and the VWC LSLR Plan will end.⁴ A copy of the Rhodes Water Utilities' updated LSLR Program is attached to this Settlement as **Exhibit A**.

12. The Rhodes Water Utilities' pro forma tariff supplements containing the proposed changes necessary to implement the LSLR Program is attached to the Settlement as **Exhibit B**. In addition, Aqua has provided the information and supporting data required by 52 Pa. Code § 53.52(a), related to revisions and supplements to a utility's tariff, which was attached as Exhibit C to Aqua's Petition for Approval of VWC's Lead Service Line Replacement Program. Aqua has updated the supporting data to provide information for the Rhodes Water Utilities and is attached hereto as **Exhibit C**.

13. In accordance with the U.S. Environmental Protection Agency's ("EPA") Lead and Copper Rule Improvements, the Rhodes Water Utilities will complete replacement of all lead service lines identified through its Service Line Inventory by December 31, 2037, or such other date as modified by the EPA or Pennsylvania Department of Environmental Protection ("DEP").

³ See note 1, *supra*.

⁴ Aqua's LSLR Program was previously approved by the Commission and contains terms substantially the same as VWC's LSLR Program. *Petition of Aqua Pennsylvania, Inc. For Approval of its Lead Service Line Replacement Program*, Docket No. P-2023-3044459, Order entered April 10, 2025.

14. The Rhodes Water Utilities will share with the OCA and the OSBA the communications, outreach, and education materials referenced in paragraph 61 of the Company’s Petition and developed by the Rhodes Water Utilities in compliance with 52 Pa. Code § 65.56(c) promptly after such materials are finalized or updated by the Rhodes Water Utilities and used by the Rhodes Water Utilities in connection with the LSLR Program.

15. The Rhodes Water Utilities will make written communications to consumers – Exhibits A through Q of the LSLR Program – available in English with a notation in Spanish as to how to request the documents in Spanish and an additional notation as to how to request the documents in the other top two non-English languages spoken in Aqua’s service territory. In addition, the Rhodes Water Utilities will create a notification letter to the consumer for Exhibit K – Pitcher Filter – with notations to request instructions for use of pitcher filter in Spanish and the other top two non-English languages spoken in Aqua’s service territory. The top two non-English languages spoken, other than Spanish, will be based on the top two most spoken languages throughout Aqua’s entire footprint.

16. Following the completion of the Rhodes Water Utilities’ Lead Service Line (“LSL”) projects in a project area set forth in the Plan, in the event the Company finds lead in a Company or customer owned service line in said completed project area, the Company will provide a report detailing the location, number of affected pipes, and the replacement date to the Commission and the statutory advocates in the Company’s Annual Asset Optimization Plan (“AAOP”) during Aqua’s Receivership duties.

17. The Rhodes Water Utilities’ Service Line Inventory will provide zip code information which can be used to identify service lines that have been inventoried and those identified as LSL or Galvanized Requiring Replacement (“GRR”).

18. During Aqua’s Receivership duties, Aqua will report as part of Aqua’s AAOP, by zip code, the number of customer-owned lead service lines (“COLSL”) replaced in the preceding year in the Rhodes Water Utilities’ service territories.

19. The Rhodes Water Utilities will utilize tools available (e.g., the Pennsylvania Department of Environmental Protection’s PennEnviroScreen tool or Justice40 Initiative) to identify environmental justice areas and high levels of children’s lead risk for targeting of inventory and replacement.

20. In accordance with 52 Pa. Code § 65.58(c)(3), the Rhodes Water Utilities shall include a section in their tariffs providing Step-In Rights to address replacement of a Customer Owned Lead Service Line (“COLSL”) to avoid termination of service when a property owner who is not the Resident is nonresponsive to an entity’s offer to replace a COLSL. The tariff language shall be as follows:

A. Step In Rights Defined. In reference to 52 Pa. Code § 65.58(c)(3), Step-In Rights means the right of the Utility to avoid termination of service to a property where the resident of the Property is not the property owner, and the property owner is nonresponsive to the Utility’s offer to replace a COLSL.

The Utility can utilize Step-In Rights in the following circumstances where a Customer or occupier of a premise is not the property owner.

1. The Utility has attempted to contact the property owner with an offer to replace the COLSL in accordance with the Utility’s LSLR Plan;
2. The Customer or the occupier of the Property is not the property owner; and
3. The Utility has attempted to get authorization to replace the COLSL, the property owner cannot be identified, or the property owner has been notified and has not responded to the Utility’s offer to replace the COLSL.

B. Circumstances Where the Utility Must Use Step-In Rights.

1. The Utility shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer or occupant of the

Property provides a medical certification signed by a licensed physician, nurse practitioner or physician's assistant to the Utility by fax, email or mail (providing the contact information).

2. The Utility shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer provides a Protection From Abuse (PFA) order, or other court order issued by a court of competent jurisdiction in this Commonwealth which provides clear evidence of domestic violence.

3. The Utility shall use Step-In Rights to avoid the termination of water service to the Customer or the occupant of the Property except when, in the Utility's reasonable judgement, replacement would place its workers or utility facilities at a safety risk and in such instance, the Utility may use Step-In Rights at its discretion.

C. After the replacement is complete, the Utility will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations caused by the service line replacement in the structure at the Property (Utility Restoration Work). No other restoration will be conducted for the Customer side replacement. The Utility will not replace any landscaping, interior finishes, paving, seeding, or walkways (Private Side Restoration Work), and all restoration costs for such Private Side Restoration Work shall be borne by the property owner.

D. When the Utility exercises Step-In Rights, the Utility's liability shall be limited to the amount in Section 51 of its Water Tariff for any action brought against the Utility, its officers, directors, employees and agents for damages arising from any and all liability, including liability to third parties and the property owner, for personal injury, including death, property damage, or other actions, damages, fines, penalties, claims, demands, judgments, losses, costs, expenses, suit and actions (including reasonable attorney's fees), for personal injury, including death, property damage or other injury, to the extent caused by or arising out of the work performed by the Utility or its agents in replacing the customer-owned LSL and/or the Utility Restoration Work that the Utility is responsible for under subsection C above.

For any service termination performed at the discretion of the Rhodes Water Utilities in compliance with the above tariff language, the Rhodes Water Utilities shall provide a list of terminations of service detailing the affected location, the reason for the termination, and the

service termination date to the Commission and the statutory advocates in Aqua's AAOP during Aqua's Receivership duties.

IV. THE SETTLEMENT IS IN THE PUBLIC INTEREST

24. This Settlement was achieved by the Joint Petitioners after an investigation of Aqua's filing, including informal discovery and negotiations.

25. Acceptance of the Settlement will avoid the necessity of further administrative and possibly appellate proceedings regarding the settled issues.

26. The Joint Petitioners are submitting their respective Statements in Support setting forth the basis upon which each believes the Settlement to be fair, just and reasonable and, therefore, in the public interest concurrently with this Settlement. The Joint Petitioners' Statements in Support will be designated as Appendices "A" through "C."

V. PROCEDURAL CONDITIONS OF SETTLEMENT

27. The Settlement is conditioned upon the Commission's approval of the terms and conditions contained herein without modification. If the Commission modifies the Settlement, any Joint Petitioner may elect to withdraw from the Settlement and may proceed with litigation and, in such event, the Settlement shall be void and of no effect. Such election to withdraw must be made in writing, filed with the Secretary of the Commission and served upon all parties within five (5) business days after the entry of an Order modifying the Settlement.

28. If the Commission does not approve the Settlement and the proceedings continue, the Joint Petitioners reserve their respective procedural rights. The Settlement is made without any admission against, or prejudice to, any position which any Joint Petitioner may adopt in the event of any subsequent litigation of these proceedings, or in any other proceeding.

29. The Joint Petitioners acknowledge and agree that this Settlement, if approved, shall have the same force and effect as if the Joint Petitioners had fully litigated these proceedings.

30. This Settlement and its terms and conditions may not be cited as precedent in any future proceeding, except to the extent required to implement this Settlement.

31. Any issues not specifically addressed in these settlement terms are not deemed as accepted or rejected as part of this Settlement. The Settlement shall not be construed as approval of any Joint Petitioner's position on any issue, except to the extent required to effectuate the terms and agreements of the Settlement.

32. Each term and condition set forth in this Settlement, whether or not set out in a numbered paragraph, shown in a table or other graphic presentation, bolded, italicized, or otherwise emphasized, or set forth in the body, a footnote, a parenthetical, an appendix, an exhibit, or otherwise, is material consideration to the entry into this Settlement by the signatory parties.

33. Unless otherwise expressly indicated, all terms and conditions contained herein shall take effect upon issuance of a final order in this proceeding, without the need or requirement for additional Commission review or approval.

34. The Joint Petitioners acknowledge that the Settlement reflects a compromise of competing positions and does not necessarily reflect any party's position with respect to any issues raised in this proceeding.

35. If the ALJ adopts the Settlement without modification, the Joint Petitioners waive their individual rights to file exceptions with regard to the Settlement.

VI. CONCLUSION

WHEREFORE, the Joint Petitioners, by their respective counsel, respectfully request:

1. That Deputy Chief Administrative Law Judge Mark A. Hoyer and the Commission approve this Settlement including all terms and conditions thereof, without modification.
2. That the Commission enter an Order authorizing the Rhodes Water Utilities to file tariff supplements in compliance with the Commission's Order.

Respectfully submitted,

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Date: July 31, 2025

Counsel for Aqua Pennsylvania, Inc.

Date: July 31, 2025

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EXHIBIT A

LSLR Plan

Aqua Pennsylvania, Inc.

As Receiver for

Rhodes Water Utilities

Lead Service Line Replacement Plan



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DEFINITIONS

Aqua or Company – Aqua Pennsylvania, Inc.

COLSL – Customer-owned lead service line

DEP – Pennsylvania Department of Environmental Protection

EPA – United States Environmental Protection Agency

GRR – Galvanized service line requiring replacement

LCRR – Lead and Copper Rule Revisions amending the EPA’s Lead and Copper Rule. All community and non-transient non-community public water systems are required to comply with the LCRR starting October 16, 2024.

Lead action level - EPA's action level for lead in water delivered to users of public drinking water systems is 10 µg/L.

LSLR – Lead service line replacement

LSLR Project Commencement – Installation of the first lead service line replacement within a lead service line replacement project area.

LTIIIP – Long-Term Infrastructure Improvement Plan

PENNVEST – Pennsylvania Infrastructure Investment Authority

PUC or Commission – Pennsylvania Public Utility Commission

Rhodes Water Utilities – Cooperstown Water Company, Fryburg Water Company, Plumer Water Company, Sugarcreek Water Company, Venango Water Company, West Hickory Water Company.

µg/L – Micrograms per liter.

I. INTRODUCTION

Aqua Pennsylvania, Inc. (“Aqua”) has developed the following Lead Service Line Replacement (“LSLR”) Plan as the Receiver¹ for Venango Water Company (“VWC”) in accordance with Chapter 65 of the Pennsylvania Public Utility Commission’s (“PUC” or the “Commission”) regulations, 52 Pa. Code §§ 65.51 et seq., and the Commission’s Final Implementation Order entered on March 14, 2022 at Docket No. L-2020-3019521.

Aqua also became the Receiver for the remaining water systems owned by the Estate of Blaine E. Rhodes (which also owns VWC), including Cooperstown Water Company, Fryburg Water Company, Plumer Water Company, Sugar creek Water Company, and West Hickory Water Company (together with VWC, these systems shall be referred to as the “Rhodes Water Utilities”).² As part of the Commission’s October 30, 2024 Opinion and Order, which adopted Deputy Chief Administrative Law Judge (“ALJ”) Mark A. Hoyer’s October 17, 2024 *Order Granting Petition for Issuance of an Interim Emergency Order on an Expedited Basis and Certifying Material Question to the Commission*, the Commission adopted Deputy Chief ALJ Hoyer’s Ordering Paragraph 18, which stated that the LSLR Plan filed by Aqua as Receiver for VWC shall apply to the other Rhodes Water Utilities and the requirements of 52 Pa. Code § 65.55(a) shall be waived such that separate LSLR plans would not be required for each of the Rhodes Water Utilities. As such, this LSLR Plan has been modified to apply to the all the Rhodes Water Utilities.

Included with the Rhodes Water Utilities’ LSLR Plan are pro-forma tariff supplements containing the proposed changes necessary to implement the LSLR Program, and information required by the Commission under 52 Pa. Code § 53.52(a).

The Rhodes Utilities are each Class C public utilities that owns water systems serving customers in the following areas:

	CWC	FWC	PWC	SWC	VWC	WHWC
Customers	133	212	69	82	247	227
Service Area	Cooperstown Borough and Jackson Township, Venango County	Washington Township, Clarion County; and Pinegrove Township Venango County	Cornplanter Township, Venango County	Sugar creek Borough, Venango County	Sugar creek Borough, Venango County	Harmony Township, Forest County

¹ Receivership established by the Commission’s Ex Parte Emergency Order dated August 11, 2023, and ratified by the Commission’s Ratification Order dated August 24, 2023 at Docket No. M-2023-3042180. Aqua’s Receivership under Section 529 was consolidated in *Venango Water Company – Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. as Receiver; Section 529 Investigation of Venango Water Company; Section 529 Investigation of Sugar creek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, Cooperstown Water Company and Blaine E. Rhodes Sewer Company*, Docket Nos. M-2023-3042180, I-2023-3042312, and P-2024-3045205, Deputy Chief Administrative Law Judge Mark A. Hoyer First Interim Order (Mar. 20, 2024) (“Section 529 Proceeding”).

² See Section 529 Proceeding, Opinion and Order at 26, Ordering Paragraphs 1-4 (Oct. 30, 2024).

Aqua provides operations and management for the Rhodes Utilities during the pending Section 529 Proceeding. The Rhodes Utilities do not have Long-Term Infrastructure Improvement Plans (“LTIIP”) on file with the Commission, and therefore, this LSLR Plan also includes information regarding the requirements of 52 Pa. Code § 121.3 as required by 52 Pa. Code § 65.54(c).

II. LSLR PLAN REQUIREMENTS

The Rhodes Water Utilities LSLR Plan contains the following elements and supporting documents as required by the Commission.

A. Service Line Inventory

The Service Line Inventory is being developed consistent with the intent and guidance of the Lead and Copper Rule Revisions (“LCRR”) including use of all available sources of information to establish service line material designations for each side of ownership (i.e., Rhodes Water Utilities and customer) which thus informs an overall service line material designation.

In developing the Service Line Inventory, Aqua, as operator of the Rhodes Water Utilities’ systems during the Receivership, has used evidence-based data, including field observations, and will verify the information provided by the Rhodes Water Utilities. Aqua has not undertaken any main replacements in the Rhodes Water Utilities’ systems to date.

When evidence-based data, as described above, is not available, Aqua has applied the following methodology to assign material designations within the Service Line Inventory:

1. Pennsylvania banned the use of lead in all plumbing in early January 1991, and therefore homes that were built during or after 1991 are similarly assigned a “non-lead” designation within the Service Line Inventory. To identify any area outliers, Aqua will implement a field verification process in compliance with the Lead and Copper Rule Improvements (“LCRI”) which as proposed currently requires a statistical analysis to ensure the veracity of the assumption to a certain confidence level. The proposed regulations are summarized at 40 CFR 141.84(b)(5). Aqua will visually observe the service line materials on both the utility and customer sides by using a combination of methods including potholing and basement inspections.
2. For galvanized service lines which are or were downstream from lead service lines (“LSLs”) and/or Aqua cannot prove that they were never downstream from an LSL or lead gooseneck they are assigned a Galvanized Requiring Replacement (“GRR”) and will be considered candidates for replacement, unless the home and service line was built during or after 1991.

Aqua is continuing to develop the Rhodes Water Utilities’ Service Line Inventory, including any field observations, assumptions as described above, and other evidence-based data.

**Aqua Pennsylvania, Inc. as Receiver for the Rhodes Utilities
Lead Service Line Replacement Plan**

Aqua will update the Rhodes Water Utilities’ Service Line Inventory as progress is made on completing the inventory and if any new water systems are acquired by the Rhodes Water Utilities. **Tables 1.a.** through **1.f.** below show total material type identification in the Rhodes Water Utilities’ service territories.

Table 1 – Current Service Line Inventory Summary

Table 1.a. – CWC

Material Type	CWC	Customer
Lead	0	0
GRR	0	0
Non-lead	11	18
Lead status unknown	122	115
Total	133	133

Table 1.b. – FWC

Material Type	FWC	Customer
Lead	0	0
GRR	0	1
Non-lead	16	31
Lead status unknown	196	180
Total	212	212

Table 1.c. – PWC

Material Type	PWC	Customer
Lead	0	0
GRR	0	1
Non-lead	7	9
Lead status unknown	62	59
Total	69	69

Table 1.d. – SWC

Material Type	SWC	Customer
Lead	0	0
GRR	0	0
Non-lead	7	13
Lead status unknown	75	69
Total	82	82

Table 1.e. - VWC

Material Type	VWC	Customer
Lead	0	0
GRR	1	7
Non-lead	65	86
Lead status unknown	181	154
Total	247	247

Table 1.f. – WHWC

Material Type	WHWC	Customer
Lead	0	0
GRR	0	0
Non-lead	5	10
Lead status unknown	222	217
Total	227	227

The Service Line Inventory with location identifiers is being developed and will be incorporated into and available on Aqua’s website as further described in Section II.C.2. The current Service Line Inventory is attached hereto as **Attachment 1**.

B. Planning and Replacements

1. Rhodes Water Utilities Projected Annual Investment and Sources of Financing

While Aqua will replace lead service lines if found during an emergency repair, Aqua does not anticipate significant LSLR activities in the Rhodes Water Utilities. However, to allow Aqua to replace LSLs if they are discovered, Aqua proposes a cap up to 10 replacements annually in each of the Rhodes Water Utilities’ systems. Anticipated sources of financing for the replacements will include cash on hand and short term debt of Aqua that will be booked under deferred accounting and recovered after the final determination of ownership in the Section 529 Proceeding.

2. Rhodes Water Utilities Projected LSLRs Per Calendar Year and Description of Projection Development

The Company is proposing a cap as set forth in **Tables 2.a.** through **2.f.:**

Table 2 – Projected Customer LSL Replacements During 2024-2028

Table 2.a. – CWC

	2024	2025	2026	2027	2028
CWC Replacements	10	10	10	10	10
Cost	\$88,000	\$88,000	\$88,000	\$88,000	\$88,000

Table 2.b. – FWC

	2024	2025	2026	2027	2028
FWC Replacements	10	10	10	10	10
Cost	\$88,000	\$88,000	\$88,000	\$88,000	\$88,000

Table 2.c. – PWC

	2024	2025	2026	2027	2028
PWC Replacements	10	10	10	10	10
Cost	\$88,000	\$88,000	\$88,000	\$88,000	\$88,000

Table 2.d. – SWC

	2024	2025	2026	2027	2028
SWC Replacements	10	10	10	10	10
Cost	\$88,000	\$88,000	\$88,000	\$88,000	\$88,000

Table 2.e. – VWC

	2024	2025	2026	2027	2028
VWC Replacements	10	10	10	10	10
Cost	\$88,000	\$88,000	\$88,000	\$88,000	\$88,000

Table 2.f. – WHWC

	2024	2025	2026	2027	2028
WHWC Replacements	10	10	10	10	10
Cost	\$88,000	\$88,000	\$88,000	\$88,000	\$88,000

In addition to finding and replacing LSLs, the addition of galvanized service lines that are or ever have been downstream from a LSL or lead gooseneck are GRR and are eligible for replacement under Act 120. These numbers are subject to change as Aqua continues to develop the Rhodes Water Utilities’ inventories and can change based on evolving regulatory requirements. The projections for 2024-2028 are consistent with Aqua’s proposed annual cap for the Rhodes Water Utilities’ systems in this LSLR Plan.

3. Prioritization Criteria

Aqua considered the following prioritization criteria when developing the LSLR Plan:

- Individual Properties
 - Emergency Repairs revealing LSLs.
 - Homes with elevated lead concentrations in tap samples.
 - Schools and licensed day care facilities
 - Homeowners that request replacements.

4. Processes and Procedures to Address Emergency Repairs and Replacements Which Reveal LSLs

When Aqua uncovers an LSL while completing emergency repairs to the Rhodes Utilities Water systems, if both the customer side and Rhodes Water Utilities side of the service line are lead, Aqua will contact the customer/owner and provide them with the information and materials in Section II.B.6. and prioritize the replacement of the entire service line, both Rhodes Water Utilities and customer side. Where emergency work requires replacement of the Rhodes Water Utilities service line and the Rhodes Water Utilities material is non-lead, Aqua will replace the Rhodes Water Utilities service line up to the curb stop but will not make the connection, and this excavation will reveal the customer-side material. If the customer side of the service line is lead, Aqua will neither make the connection nor restore service, and Aqua will provide the resident with the information and materials in Section II.B.6. and immediately coordinate and prioritize replacement of the COLSL. Aqua will also provide the materials and information in Section II.B.6 to residents of a premises who are neither customers nor owners, but occupy the premises.

Where emergency work requires a spot repair to a Rhodes Water Utilities side service line, the work does not require the replacement of the Rhodes Water Utilities service line, and the Rhodes Water Utilities side service line is not lead or GRR, then Aqua will complete the repair and restore service to the premises. Under this circumstance a connection was never severed and there was no partial replacement, therefore it does not require termination of service.

When Aqua uncovers an LSL while completing emergency repairs to the Rhodes Water Utilities systems, and the LSL is Rhodes Water Utilities-owned, Aqua will replace the Rhodes Water Utilities service line up to the curb stop but will not make the connection, and this excavation will reveal the customer-side material. Upon verification that the customer's service line is not lead, Aqua will complete the Rhodes Water Utilities-side replacement and restore service to the property. Aqua will provide the customer with information regarding lead, pitcher filters, and flushing instructions as described below. If the customer's service line material is lead or GRR, Aqua will neither make the connection nor restore service, and Aqua will provide the resident with the information and materials in Section II.B.6. and immediately coordinate and prioritize replacement of the COLSL.

5. Processes and Procedures to Obtain Acceptance of a LSLR Prior to Project Commencement When the Customer Is and Is Not the Property Owner

If main replacements are required, Aqua or its third-party representatives will send pre-letters to customers in preparation for the commencement of a main replacement project and will request authorization to gain access to a structure using pre-investigation letters (**Exhibits A1, A2,**

and A3), requesting access to review the material type of the customer's service line. Aqua personnel or Aqua's third-party vendor will visit each customer premise within the scope of the project with an unknown service line material to identify material type of the customer service line. Aqua also sends out a letter to new customers when they move-in and establish an account with Aqua (**Exhibit A4**). Aqua plans on engaging customers/residents throughout its footprint with surveys (**Exhibit B**) sent by mail requesting customer participation in identifying service line materials. Aqua will also be developing additional survey materials to engage customers/residents to assist Aqua in completing the Rhodes Water Utilities Service Line Inventory. If Aqua uncovers a Rhodes Water Utilities LSL or a COLSL during maintenance or construction activities, Aqua will provide a form (**Exhibit C**) to the resident if the resident is at the premise or will post the form if the resident is not at the premise and attempt to contact the resident through phone to follow up with further information.

If there is no response to the pre-investigation letter or form, Aqua personnel or its third-party vendor will visit the premises to obtain acceptance in-person. If there is no response to door knocks, a door hanger (**Exhibit D**) will be left at the premises providing a contact number and requesting access to the resident/property owner's property to identify the service line material. If there is no response to the in-person outreach, a list is generated and Aqua will call the resident. If Aqua does not receive a response, it will initiate the 10-day shut-off procedures (**Exhibit E**) to get access and review the service line material. If there is still no contact, Aqua will commence with the shut-off of service and require access to review the service line material as a condition to restore service.

After making contact with the resident and identifying the presence of a COLSL, Aqua personnel will ask whether the resident is the owner or renter of the building. If the customer is the owner, and they agree to participate in the replacement, then Aqua will provide the information and materials in Section II.B.6 below. If the customer is the owner and refuses to participate in the replacement, Aqua will follow the provisions of Section II.B.10, below. If the resident is not the property owner, Aqua will obtain the owner's contact information from the resident and call the owner to explain the program to the owner and provide the owner with a copy of the Customer Lead/Galvanized Service Line Replacement Agreement ("Replacement Agreement") (**Exhibit F**). If Aqua does not receive a response to telephone calls to the owner, Aqua will send a letter to the property owner (**Exhibit G**) explaining the program and request that the property owner contact Aqua. If the property owner does not respond, Aqua will explore all options to encourage property owners to participate, such as contacting the municipality and the local code enforcement in which the property is located, and, in certain circumstances, at Aqua's discretion, using Step In Rights as described in Section II.B.10. If Aqua has not received acceptance after multiple efforts to contact the property owner and obtain the Replacement Agreement, Aqua will initiate the 10-day shut-off process.

6. Processes and Procedures Based on Acceptance of a LSLR

If the resident or property owner expresses that they want to participate in the Rhodes Water Utilities' LSLR Program after their service line has been identified as lead, Aqua will provide the following information to the customer:

Aqua Pennsylvania, Inc. as Receiver for the Rhodes Utilities
Lead Service Line Replacement Plan

- Customer Lead/Galvanized Service Line Replacement Agreement and postage-prepaid and pre-addressed envelope to Aqua (**Exhibit F**).
- Lead Fact Sheet providing educational information about lead in drinking water (**Exhibit H**).
- Information Sheet explaining the Rhodes Water Utilities' Lead Service Line Replacement Program (**Exhibit I**).
- Post-COLSL replacement flushing instructions (**Exhibit J**).
- Pitcher filter with six months of replacement cartridges (**Exhibit K**).

When the above information is provided to the resident/property owner, Aqua will explain to the resident/property owner that a plumber will contact them and schedule the replacement of the COLSL. If the resident/property owner does not return the Replacement Agreement, Aqua will contact the resident/property owner until it receives a signed copy of the Replacement Agreement, which will be retained by Aqua. During a main replacement project, Aqua will proceed with the procedures set forth in II.B.10. if the signed Replacement Agreement is not returned.

The Replacement Agreement allows a third-party licensed professional to enter the property and complete the LSLR. The agreement authorizes Aqua and the contractor performing the work to access the resident/property owner's property, confirms the ownership of the service line following installation, and provides a warranty on the work completed. Further, the agreement requires that the contractor install the replacement service line and restore the property as reasonably as practicable to the condition that existed prior to the LSLR.

Following replacement, Aqua personnel will visit the customer's property within 5 business days after the customer LSL replacement to reinstall or exchange the meter.

Atypical conditions for a LSLR may include (a) the property owner has passed away and an executor is seeking replacement, (b) a person selling property during main replacement project, or (c) a service line serving multiple properties. As these situations arise, Aqua will require documentation and, in Aqua's judgment, get the proper authorization to complete the replacement.

In closing out the project, Aqua will then provide a letter (**Exhibit L**) to the customer 3-6 months post-replacement confirming the provisions in the Replacement Agreement for project close-out. The letter confirms the newly installed customer service line has been transferred back to the property owner and reminds the resident/property owner of the warranty for the completed work. Aqua will also offer to provide sampling materials for post replacement 5th liter sampling. If the resident agrees, Aqua will provide instructions for post-replacement 5th liter sampling (**Exhibit M**). Following 5th liter sampling, Aqua will call and mail 5th liter sampling results within 10 business days for results less than 10 ug/L and withing 3 calendar days for results greater than 10 ug/L (**Exhibit N**).

7. Lead/Material Recycling and Disposal Efforts

When a customer LSLR occurs, Aqua's vendors make an attempt to pull the entire length of the line which reduces excavation and restoration costs. However, often the line cannot be pulled through and is abandoned in place. Aqua's third party vendors who complete the replacements will dispose of any lead material removed at recycling centers. No proceeds are provided to Aqua of the recycled material removed by the vendors.

For Rhodes Water Utilities side LSL replacements, Aqua attempts to pull the entire length of the line which reduces excavation and restoration costs. However, often the line cannot be pulled through and is abandoned in place. Any lead material removed during a Rhodes Water Utilities side LSL replacement will be brought back to Aqua's division office and put in Aqua's recycling containers to be taken to the recycling center. The scrap metal that is recycled will be charged to a deferred regulatory asset.

8. Industry Accepted Practices

Aqua in administering the Rhodes Water Utilities' LSLR Program will adhere to the provisions of each of the Rhodes Water Utilities' tariffs regarding replacement of Rhodes Water Utilities' service lines. In addition, Aqua will require Aqua personnel and its contractors to comply with any applicable plumbing codes related to customer-side service line replacement. Aqua will follow Commission regulations regarding LSLRs including prevention of partial service line replacements and termination of service provisions, if needed to prevent partial LSL replacements.

9. Integration of Acquired Systems in the LSLR Plan

Aqua does not foresee any of the Rhodes Water Utilities acquiring any additional water systems while it is operating the Rhodes Water Utilities systems under the Receivership. If the Rhodes Water Utilities acquire a water system prior to the deadline for water systems to complete their Service Line Inventories, Aqua will take over the water system's efforts, if any, to identify and incorporate the service line materials of the system into the Rhodes Water Utilities' overall Service Line Inventory. This will include the efforts described in Section II.A., above.

Again, Aqua does not foresee the Rhodes Water Utilities acquiring additional water systems; however, for water systems acquired by the Rhodes Water Utilities after the deadline to complete Service Line Inventories, Aqua will incorporate the acquired system's completed inventory into the Rhodes Water Utilities Service Line Inventory.

10. Procedure Regarding Refusal of Offer to Replace a LSL

During a LSLR project connected to a main replacement or where the Rhodes Water Utilities service line needs to be replaced, if the resident/property owner refuses to replace, and Aqua has either made contact with the resident/property owner and they refuse, or where the resident/property owner is non-responsive to Aqua's requests as described in Section II.B.5 to replace the COLSL, Aqua will initiate termination procedures. Termination procedures include posting of 10-day shut off notices, and other required contacts under the Commission's regulations.

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When Aqua provides the 10-day shut off notice to the customer (either through delivery or posting at the customer's premises), Aqua will also provide the Customer Refusal Letter – either for not allowing access to identify service line material (**Exhibit O1**), or for failure to allow Aqua to replace the COLSL during a main replacement or where Aqua has to replace the Aqua side service line (**Exhibit O2**), the Lead Fact Sheet describing the health hazards of lead service lines (**Exhibit H**), and the Lead Service Line Program Information Sheet (**Exhibit I**) which explains the requirements for reimbursement and the potential for termination of service.

In certain circumstances, Aqua shall use Step-In Rights as described in its tariff to perform a replacement where it will avoid termination of service to an occupant or customer that is not the property owner, where the customer has a protection from abuse order (or other court order of competent jurisdiction in this Commonwealth which provides clear evidence of domestic violence) or a medical certificate.

In other circumstances, Aqua may utilize Step-In Rights as described in its tariff to perform a replacement where it will avoid termination of service to an occupant or customer that is not the property owner. Under these limited circumstances, the Step In Rights may be used when Aqua has attempted to contact the property owner to replace the COLSL, the structure is occupied by a party that is not the property owner, and Aqua has attempted to get authorization to replace the COLSL, and the property owner cannot be identified, or the property owner has been notified of the offer to replace the COLSL and has not responded.

Where Aqua is performing LSLR projects that are not connected to a main replacement or the replacement of the Aqua side service line, and the resident/property owner refuses to replace the customer side LSL and Aqua has either made contact with the resident/property owner and they refuse, or where the resident/property owner is non-responsive to Aqua's requests as described in Section II.B.5 to replace the customer LSL, Aqua will provide the Customer Refusal Letter – Non-Main Replacement (**Exhibit O3**), the Lead Fact Sheet describing the health hazards of lead service lines (**Exhibit H**), and the Lead Service Line Program Information Sheet (**Exhibit I**) which explains the requirements for reimbursement. Aqua will not initiate termination procedures for customers who refuse to replace their LSLs or GRRs unless there is a replacement to the Rhodes Water Utilities service line.

Aqua's representatives will include notes within Aqua's customer information system documenting the refusal or non-response and complete any termination procedures as needed if the customer/property owner continues to refuse to replace the customer LSL or does not respond.

C. Communications, Outreach and Education

Aqua's communications activities as Receiver for the Rhodes Water Utilities listed and described in the following sections are in accordance with EPA regulations at 40 C.F.R. § 141.85.

1. Printed and Broadcast Materials

As described in Section II.B above, and as further supplemented here, below is a list of all printed and broadcast materials Aqua plans on distributing under different scenarios of customer LSL replacement efforts. These materials may change or be updated from time to time.

- Exhibit A1 – Pre-investigative letters to identify service line material.
- Exhibit A2 – Second Notice of Pre-investigative letter to identify service line material.
- Exhibit A3 – Final Notice of Pre-investigative letter to identify service line material.
- Exhibit A4 – Move-in Letter to customers regarding service line material.
- Exhibit B – Customer surveys.
- Exhibit C – Form provided to customer if the Company discovers a LSL or GRR during construction or maintenance activities.
- Exhibit D – Door hanger placed if contact is not made with customer to identify service line material.
- Exhibit E – 10 day shutoff notice.
- Exhibit F – Customer Lead/Galvanized Service Line Replacement Agreement.
- Exhibit G – Letter to customer requesting participation in the replacement program.
- Exhibit H – Lead Fact Sheet providing educational information about lead in drinking water.
- Exhibit I – Lead Service Line Replacement Program Information Sheet.
- Exhibit J – Post-COLSL replacement flushing instructions.
- Exhibit K – Pitcher filter, and instructions in other languages.
- Exhibit L – COLSL replacement close out letter.
- Exhibit M – 5th Liter sampling instructions.
- Exhibit N – 5th Liter sample results letter.
- Exhibit O1 – Letter provided if customer refuses or does not respond to requests for Aqua to access the Rhodes Water Utilities’ meter to review the customer service line material.
- Exhibit O2 – Letter provided if the customer has an identified COLSL and refuses or does not respond to requests to replace the COLSL in connection with a main replacement project or where Aqua is replacing the Rhodes Water Utilities side service line.
- Exhibit O3 – Letter provided where the customer refuses or does not respond to requests to replace the COLSL that are not connected to a main replacement project or a Rhodes Water Utilities side service line replacement.

In addition to the above communication materials, Aqua has developed letters to be distributed as required by EPA regulations when they take effect:

- Exhibit P – Public education materials when elevated lead levels are found in a system.
- Exhibit Q – Notification of individual tap results from lead tap monitoring.

- Exhibit R – Notification of known service line containing lead / GRR / unknown.
- Exhibit S – Held for future use.
- Exhibit T – Held for future use.
- Exhibit U – Notification of a disturbance to a lead, GRR, or lead status unknown service line that results in the service line being shut off or bypassed.
- Exhibit V – Notification of a disturbance to a lead, GRR, or lead status unknown service line from the replacement of an inline water meter, a water meter setter, or gooseneck, pigtail, or connector.
- Exhibit W – Press release regarding action level exceedance.

2. Aqua's Website

The Company has developed a section of its website that houses information related to Lead and its LSLR Program.

www.aquawater.com/lead

Aqua's website provides information on sources of lead, the health effects of lead, the Company's compliance with lead requirements, how residents can protect against lead exposure, and a help line for residents requiring assistance in determining their service line material. The website also includes information on Aqua's LSLR Program, including the status of current efforts to replace LSLs, flushing instructions post-replacement, a video showing how to take a sample with the sample bottles provided by Aqua, and reimbursement requirements.

Aqua has developed an online tool to show service line material which is available on Aqua's publicly facing website. This tool can be found at the below web address and can also be accessed through Aqua's Lead web page.

www.aquawater.com/leadmap

Aqua is also developing an online tool that will show the replacement schedule by geographical location, six months into the future. This tool will be completed in accordance with the timeline set forth in the Commission's regulations. Aqua is proposing to incorporate information related to the Rhodes Water Utilities within this online tool. The online tool will be able to be used by customers/property owners to determine if they are within the required radius of a project and within the required time of the commencement of a project, thereby allowing them to determine their eligibility for reimbursement.

III. CONCLUSION

Aqua, as Receiver for the Rhodes Water Utilities systems, will continue to develop the Rhodes Water Utilities Service Line Inventory and replace customer LSLs in accordance with this LSLR Plan and work toward the goal of removing all LSLs from the Rhodes Water Utilities systems. The Rhodes Water Utilities LSLR Plan will be updated as needed.

ATTACHMENT 1

Service Line Inventory

Summary Table

Row Labels	Count of Aqua Classification
Cooperstown (6610017)	133
Non Lead	11
Unknown	122
Fryburg (6160030)	212
Non Lead	16
Unknown	196
Plumer (6610011)	69
Non Lead	7
Unknown	62
Sugarcreek (6610029)	82
Non Lead	7
Unknown	75
West Hickory (6270002)	227
Non Lead	5
Unknown	222
Venango (6610014)	247
Galvanized Requiring Replaceme	1
Non Lead	65
Unknown	181
Grand Total	970

Row Labels	Count of Customer Classification
Cooperstown (6610017)	133
Non Lead	18
Unknown	115
Fryburg (6160030)	212
Galvanized Requiring Replaceme	1
Non Lead	31
Unknown	180
Plumer (6610011)	69
Galvanized Requiring Replaceme	1
Non Lead	9
Unknown	59
Sugarcreek (6610029)	82
Non Lead	13
Unknown	69
West Hickory (6270002)	227
Non Lead	10
Unknown	217
Venango (6610014)	247
Galvanized Requiring Replaceme	7
Non Lead	86
Unknown	154
Grand Total	970

No.	System	Municipality	Address	Street	City	Zip Code	County	Premise Type	Meter Size	Aqua Material	Aqua Classification	Customer Material	Customer Classification	Overall Service Classification
512	Venango (6610014)	Sugarcreek Boro.	1999 ALLEGHENY BLVD	ALLEGHENY BLVD	RENO	16343	Venango	Commercial	5/8	Unknown	Unknown	PVC	Non Lead	Unknown
513	Venango (6610014)	Sugarcreek Boro.	2 9TH ST	9TH ST	RENO	16343	Venango	Residential	5/8	Copper	Non Lead	Copper	Non Lead	Non Lead
514	Venango (6610014)	Sugarcreek Boro.	2 ALLEGHENY BLVD	ALLEGHENY BLVD	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
515	Venango (6610014)	Sugarcreek Boro.	2 SHAFFER RUN RD	SHAFFER RUN RD	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
516	Venango (6610014)	Sugarcreek Boro.	2 SIXTH ST APT 1	SIXTH ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
517	Venango (6610014)	Sugarcreek Boro.	2 SIXTH ST APT 2	SIXTH ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
518	Venango (6610014)	Sugarcreek Boro.	202 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
519	Venango (6610014)	Sugarcreek Boro.	203 4TH ST	4TH ST	RENO	16343	Venango	Residential	5/8	Polyethylene (HDPE)	Non Lead	Unknown	Unknown	Unknown
520	Venango (6610014)	Sugarcreek Boro.	203 9TH ST	9TH ST	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	PVC	Non Lead	Non Lead
521	Venango (6610014)	Sugarcreek Boro.	204 8TH ST	8TH ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
522	Venango (6610014)	Sugarcreek Boro.	205 OAK ST	OAK ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
523	Venango (6610014)	Sugarcreek Boro.	205 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Other Not Lead	Non Lead	Other Not Lead	Non Lead	Non Lead
524	Venango (6610014)	Sugarcreek Boro.	207 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	PVC	Non Lead	Unknown
525	Venango (6610014)	Sugarcreek Boro.	209 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Copper	Non Lead	Copper	Non Lead	Non Lead
526	Venango (6610014)	Sugarcreek Boro.	2097 ALLEGHENY BLVD	ALLEGHENY BLVD	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	Copper	Non Lead	Non Lead
527	Venango (6610014)	Sugarcreek Boro.	210 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
528	Venango (6610014)	Sugarcreek Boro.	211 WALNUT ST	WALNUT ST	RENO	16343	Venango	Other	5/8	Other Not Lead	Non Lead	Other Not Lead	Non Lead	Non Lead
529	Venango (6610014)	Sugarcreek Boro.	2119 ALLEGHENY BLVD	ALLEGHENY BLVD	RENO	16343	Venango	Commercial	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
530	Venango (6610014)	Sugarcreek Boro.	214 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
531	Venango (6610014)	Sugarcreek Boro.	2141 ALLEGHENY BLVD	ALLEGHENY BLVD	RENO	16343	Venango	Commercial	5/8	PVC	Non Lead	PVC	Non Lead	Non Lead
532	Venango (6610014)	Sugarcreek Boro.	2149 ALLEGHENY BLVD	ALLEGHENY BLVD	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	PVC	Non Lead	Unknown
533	Venango (6610014)	Sugarcreek Boro.	2159 ALLEGHENY BLVD	ALLEGHENY BLVD	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	PVC	Non Lead	Unknown
534	Venango (6610014)	Sugarcreek Boro.	2169 ALLEGHENY BLVD	ALLEGHENY BLVD	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	PVC	Non Lead	Non Lead
535	Venango (6610014)	Sugarcreek Boro.	2179 ALLEGHENY BLVD	ALLEGHENY BLVD	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	PVC	Non Lead	Non Lead
536	Venango (6610014)	Sugarcreek Boro.	23 WOLBERT ALY	WOLBERT ALY	RENO	16343	Venango	Residential	5/8	Not Lead	Non Lead	Not Lead	Non Lead	Non Lead
537	Venango (6610014)	Sugarcreek Boro.	28 BROOK ST	BROOK ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
538	Venango (6610014)	Sugarcreek Boro.	3 1/2 9TH ST	9TH ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
539	Venango (6610014)	Sugarcreek Boro.	3 9TH ST	9TH ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Galvanized	Galvanized Requiring Replacement	Galvanized Requiring Replacement
540	Venango (6610014)	Sugarcreek Boro.	3 THIRD ST	THIRD ST	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	Unknown	Unknown	Unknown
541	Venango (6610014)	Sugarcreek Boro.	3 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	PVC	Non Lead	Non Lead
542	Venango (6610014)	Sugarcreek Boro.	301 OAK ST	OAK ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
543	Venango (6610014)	Sugarcreek Boro.	301 THIRD ST	THIRD ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
544	Venango (6610014)	Sugarcreek Boro.	302 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
545	Venango (6610014)	Sugarcreek Boro.	303 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	-	Copper	Non Lead	Copper	Non Lead	Non Lead
546	Venango (6610014)	Sugarcreek Boro.	305 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
547	Venango (6610014)	Sugarcreek Boro.	307 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
548	Venango (6610014)	Sugarcreek Boro.	308 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
549	Venango (6610014)	Sugarcreek Boro.	316 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Other Not Lead	Non Lead	Other Not Lead	Non Lead	Non Lead
550	Venango (6610014)	Sugarcreek Boro.	32 PROGRESS DR	PROGRESS DR	RENO	16343	Venango	Commercial	2	Unknown	Unknown	Unknown	Unknown	Unknown
551	Venango (6610014)	Sugarcreek Boro.	38 SHAFFER RUN RD	SHAFFER RUN RD	RENO	16343	Venango	Residential	5/8	Not Lead	Non Lead	Not Lead	Non Lead	Non Lead
552	Venango (6610014)	Sugarcreek Boro.	4 6TH ST	6TH ST	RENO	16343	Venango	Residential	-	Unknown	Unknown	PVC	Non Lead	Unknown
553	Venango (6610014)	Sugarcreek Boro.	4 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
554	Venango (6610014)	Sugarcreek Boro.	402 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
555	Venango (6610014)	Sugarcreek Boro.	403 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Other Not Lead	Non Lead	Other Not Lead	Non Lead	Non Lead
556	Venango (6610014)	Sugarcreek Boro.	404 OAK ST	OAK ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
557	Venango (6610014)	Sugarcreek Boro.	404 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	PVC	Non Lead	Non Lead
558	Venango (6610014)	Sugarcreek Boro.	405 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
559	Venango (6610014)	Sugarcreek Boro.	406 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	Polyethylene (HDPE)	Non Lead	Non Lead
560	Venango (6610014)	Sugarcreek Boro.	407 OAK ST	OAK ST	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	PVC	Non Lead	Non Lead
561	Venango (6610014)	Sugarcreek Boro.	407 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	PVC	Non Lead	Non Lead
562	Venango (6610014)	Sugarcreek Boro.	409 OAK ST	OAK ST	RENO	16343	Venango	Residential	-	Unknown	Unknown	Unknown	Unknown	Unknown
563	Venango (6610014)	Sugarcreek Boro.	409 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	PVC	Non Lead	Non Lead
564	Venango (6610014)	Sugarcreek Boro.	410 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	PVC	Non Lead	Unknown
565	Venango (6610014)	Sugarcreek Boro.	411 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	Unknown	Unknown	Unknown
566	Venango (6610014)	Sugarcreek Boro.	413 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
567	Venango (6610014)	Sugarcreek Boro.	414 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	-	Unknown	Unknown	Unknown	Unknown	Unknown
568	Venango (6610014)	Sugarcreek Boro.	416 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
569	Venango (6610014)	Sugarcreek Boro.	4TH ST	4TH ST	RENO	16343	Venango	Commercial	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
570	Venango (6610014)	Sugarcreek Boro.	4TH ST	4TH ST	RENO	16343	Venango	Commercial	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
571	Venango (6610014)	Sugarcreek Boro.	4TH ST	4TH ST	RENO	16343	Venango	Commercial	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
572	Venango (6610014)	Sugarcreek Boro.	4TH ST	4TH ST	RENO	16343	Venango	Commercial	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
573	Venango (6610014)	Sugarcreek Boro.	5 9TH ST	9TH ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	PVC	Non Lead	Unknown
574	Venango (6610014)	Sugarcreek Boro.	5 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
575	Venango (6610014)	Sugarcreek Boro.	5 WOLBERT ALY	WOLBERT ALY	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
576	Venango (6610014)	Sugarcreek Boro.	50 FIRST ST	FIRST ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	PVC	Non Lead	Unknown
577	Venango (6610014)	Sugarcreek Boro.	504 OAK ST	OAK ST	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	Copper	Non Lead	Non Lead
578	Venango (6610014)	Sugarcreek Boro.	504 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
579	Venango (6610014)	Sugarcreek Boro.	505 OAK ST	OAK ST	RENO	16343	Venango	Residential	5/8	PVC	Non Lead	PVC	Non Lead	Non Lead
580	Venango (6610014)	Sugarcreek Boro.	507 CHESTNUT ST	CHESTNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
581	Venango (6610014)	Sugarcreek Boro.	508 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
582	Venango (6610014)	Sugarcreek Boro.	509 OAK ST	OAK ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
583	Venango (6610014)	Sugarcreek Boro.	510 OAK ST	OAK ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
584	Venango (6610014)	Sugarcreek Boro.	510 WALNUT ST	WALNUT ST	RENO	16343	Venango	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown

No.	System	Municipality	Address	Street	City	Zip Code	County	Premise Type	Meter Size	Aqua Material	Aqua Classification	Customer Material	Customer Classification	Overall Service Classification
950	West Hickory (6270002)	Harmony Twp.	377 SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	PVC	Non Lead	Unknown
951	West Hickory (6270002)	Harmony Twp.	608 HILLTOP RD	HILLTOP RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
952	West Hickory (6270002)	Harmony Twp.	743 CENTER RD	CENTER RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
953	West Hickory (6270002)	Harmony Twp.	SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
954	West Hickory (6270002)	Harmony Twp.	SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
955	West Hickory (6270002)	Harmony Twp.	1937 LEASE TRL	LEASE TRL	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
956	West Hickory (6270002)	Harmony Twp.	SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
957	West Hickory (6270002)	Harmony Twp.	692 HILL TOP RD	HILL TOP RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
958	West Hickory (6270002)	Harmony Twp.	1948 LEASE TRIAL RD	LEASE TRIAL RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
959	West Hickory (6270002)	Harmony Twp.	SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
960	West Hickory (6270002)	Harmony Twp.	SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
961	West Hickory (6270002)	Harmony Twp.	487 SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
962	West Hickory (6270002)	Harmony Twp.	465 SKI HI DR	SKI HI DR	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
963	West Hickory (6270002)	Harmony Twp.	720 CENTER RD	CENTER RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
964	West Hickory (6270002)	Harmony Twp.	461 SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
965	West Hickory (6270002)	Harmony Twp.	504 SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
966	West Hickory (6270002)	Harmony Twp.	494 SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
967	West Hickory (6270002)	Harmony Twp.	476 SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	-	Unknown	Unknown	Unknown	Unknown	Unknown
968	West Hickory (6270002)	Harmony Twp.	SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
969	West Hickory (6270002)	Harmony Twp.	460 SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown
970	West Hickory (6270002)	Harmony Twp.	454 SKI HI RD	SKI HI RD	WEST HICKORY	16370	Forest	Residential	5/8	Unknown	Unknown	Unknown	Unknown	Unknown

EXHIBIT A1

Pre-investigative letter to identify service
line material



Date

M1-XXX RESIDENT OR CURRENT RESIDENT ADDRESS CITY STATE ZIP



Dear Customer,

Aqua Pennsylvania is completing a service line material inventory as required by the United States Environmental Protection Agency (USEPA), the Pennsylvania Department of Environmental Protection (PADEP), and the Pennsylvania Public Utility Commission (PAPUC). We have two options available for you to identify your service line material. The first option is self-reporting that involves either filling out a survey (enclosed) that can be mailed back to us, or using the QR Code provided on the survey to upload your survey responses. The second option is to schedule an appointment to have your water service line inspected to determine its material of construction, and more specifically, to determine if you have a lead or galvanized service line. To complete this study in a timely manner, Aqua has hired a contractor, Environmental Resource Management (ERM). If you select the second option, ERM will have an inspector visit your home to collect information regarding service line material.

The presence of a lead or galvanized water service line does not mean that drinking water in your home is contaminated with lead; however, removal of the lead or galvanized service line eliminates any future possibility of lead entering your water supply from the water service line. You can learn more about lead in drinking water and steps you can take to minimize exposure by calling the Safe Drinking Water Hotline at (800) 426-4791, or by visiting the EPA website at https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water.

If our inspection reveals that you have a lead or galvanized service line, Aqua is required to replace, AT NO DIRECT COST TO YOU, any part of your service line that is constructed of lead or galvanized pipe. The service line extends from the water main in the street to your water meter. Aqua will install the new service line and you will own and maintain the new service line as a part of your property. We will provide you with additional service line replacement information if we identify that your service line is lead or galvanized.

If you prefer to have your service line inspected in person, please call the ERM Call Center (484) 913-0346 between the hours of 8am-6pm to schedule an appointment. Appointments will be available on select weekdays, evenings and Saturdays. Please state that you are calling to have your water line inspected for lead or galvanized pipe. We thank you in advance for your support for this important initiative.

Sincerely,

Handwritten signature of Michael Fili

Michael Fili, Vice President
Capital Planning, Design & Construction Aqua Pennsylvania

Para acceder al documento traducido al español, visite el sitio web de Aqua en https://www.aquawater.com/aqua-pa-lead-spanish.php

如果需要查看本文件的中文简体字译本, 请访问 Aqua 网站 : https://www.aquawater.com/aqua-pa-lead-chinese.php

Die deutsche Übersetzung dieses Dokuments finden Sie auf der Website von Aqua unter https://www.aquawater.com/aqua-pa-lead-german.php

EXHIBIT A2

Second Pre-investigative letter to identify
service line material

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*****SECOND NOTICE*****

Dear Customer,

Aqua Pennsylvania is completing a service line material inventory as required by the United States Environmental Protection Agency (USEPA), the Pennsylvania Department of Environmental Protection (PADEP), and the Pennsylvania Public Utility Commission (PAPUC). We have two options available for you to identify your service line material. The first option is self-reporting that involves either filling out a survey (enclosed) that can be mailed back to us, or using the QR Code provided on the survey to upload your survey responses. The second option is to schedule an appointment to have your water service line inspected to determine its material of construction, and more specifically, to determine if you have a lead or galvanized service line. To complete this study in a timely manner, Aqua has hired a contractor, Environmental Resource Management (ERM). If you select the second option, ERM will have an inspector visit your home to collect information regarding service line material.

The presence of a lead or galvanized water service line does not mean that drinking water in your home is contaminated with lead; however, removal of the lead or galvanized service line eliminates any future possibility of lead entering your water supply from the water service line. You can learn more about lead in drinking water and steps you can take to minimize exposure by calling the Safe Drinking Water Hotline at (800) 426-4791, or by visiting the EPA website at <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>.

If our inspection reveals that you have a lead or galvanized service line, **Aqua is required to replace, AT NO DIRECT COST TO YOU, any part of your service line that is constructed of lead or galvanized pipe. The service line extends from the water main in the street to your water meter.** Aqua will install the new service line and you will own and maintain the new service line as a part of your property. We will provide you with additional service line replacement information if we identify that your service line is lead or galvanized.

If you prefer to have your service line inspected in person, please call the **ERM Call Center (484) 656-7070** between the hours of 8am-6pm to schedule an appointment. Please state that you are calling to have your water line inspected for lead or galvanized pipe. We thank you in advance for your support for this important initiative.

Sincerely,

A handwritten signature in blue ink that reads "Michael Fili".

Michael Fili, Vice President
Capital Planning, Design & Construction
Aqua Pennsylvania



EXHIBIT A3

Final Pre-investigative letter to identify
service line material



DATE

******FINAL ATTEMPT TO REACH YOU BEFORE FURTHER ACTION TAKEN******

M1-XXX RESIDENT
OR CURRENT RESIDENT
ADDRESS
CITY ST ZIP



Dear Customer,

Aqua Pennsylvania (Aqua or the Company), through its contractor, Environmental Resources Management, Inc. (ERM), has attempted to reach you on multiple occasions regarding a significant project that is under way in your area. Aqua requires that you identify your service line material or permit ERM to access the Company's meter at your property.

As required by the United States Environmental Protection Agency (USEPA), the Pennsylvania Department of Environmental Protection (PADEP), and the Pennsylvania Public Utility Commission (PAPUC), Aqua is complete a service line material inventory. We have two options available for you to identify your service line material. The first option is self-reporting that involves either filling out a survey (enclosed) that can be mailed back to us, or using the QR Code provided on the survey to upload your survey responses. The second option is to schedule an appointment to have your water service line inspected to determine its material of construction and more specifically, to determine if you have a lead or galvanized service line. If you select the second option, ERM will have an inspector visit your home to collect information regarding service line material. Failure to select one of these methods may result in further action taken by Aqua to obtain the required information, including requiring you to permit access to the Company's meter at your property and potential termination of service for failure to provide access.

The presence of a lead or galvanized water service line does not mean that drinking water in your home is contaminated with lead; however, removal of the lead or galvanized service line eliminates any future possibility of lead entering your water supply from the water service line. You can learn more about lead in drinking water and steps you can take to minimize exposure by calling the Safe Drinking Water Hotline at (800) 426-4791, or by visiting the EPA website at <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>.

If our inspection reveals that you have a lead or galvanized service line, **Aqua will replace, AT NO DIRECT COST TO YOU, any part of your service line that is constructed of lead or galvanized pipe. The service line extends from the water main in the street to your water meter.** Aqua owns the portion of the service line from the main in the street to the curb stop or edge of right of way (Aqua Service Line). You own the portion of the service line from the curb stop or edge of right of way through your property and into your structure (Customer Service Line). Aqua will install the new service line and dedicate back to you the Customer Service Line and you will own and maintain the new Customer Service Line as a part of your property. We will provide you with additional service line replacement information if we identify that your service line is lead or galvanized.

If you prefer to have your service line inspected in person, please call the **ERM Call Center at (484) 913-0346** between the hours of 8am-6pm to schedule an appointment. Please state that you are calling to have your water line inspected for lead or galvanized pipe. It is important that we hear from you soon. We thank you in advance for your support for this important initiative.

Sincerely,

Michael Fili, Vice President
Capital Planning, Design & Construction Aqua Pennsylvania

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EXHIBIT A4

Move-In Letter



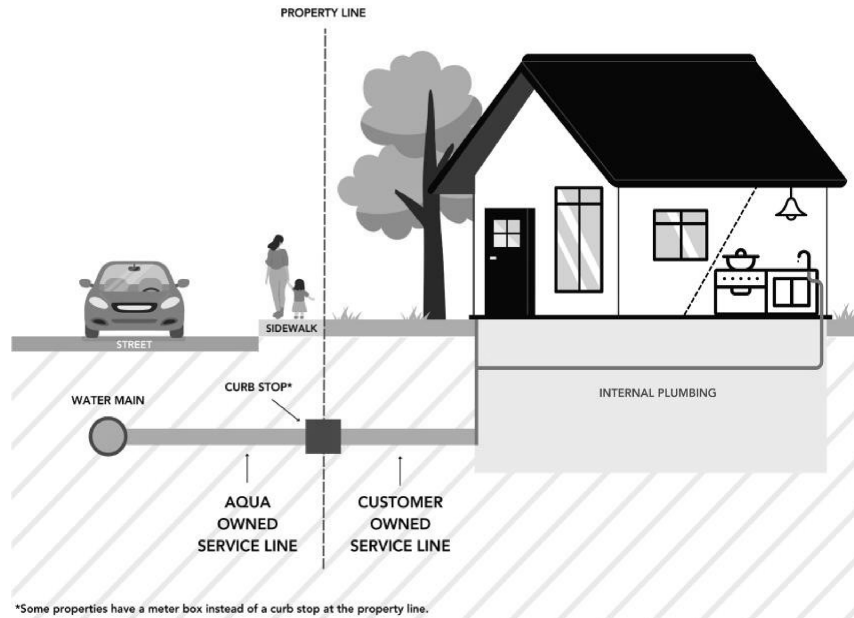
An  Essential Utilities Company

*****AUTO**SCH 5-DIGIT 16114
 
John Q Sample M2D-01
123 Main St
Anytown, PA 19010

Dear Consumer:

Aqua is pleased to provide water service to your new address. Aqua supplies water to your property through a service line that runs from the water main into your building. Aqua owns the service line from the water main to the curb stop or meter box. You own the service line that runs from the curb stop or meter box into your building.

Aqua is conducting an ongoing service line material inventory and replacement program to identify and replace lead and galvanized service lines in our drinking water systems at no direct cost to our customers. Galvanized service lines are replaced if they could potentially be a source of lead to your tap water. Under the United States Environmental Protection Agency (USEPA), Aqua is required to notify you, as a new water consumer, whether your service line consists of lead, galvanized requiring replacement, or an unknown material. Currently, no action is required of you.



SEE BELOW FOR YOUR SERVICE LINE CLASSIFICATION

Our records show the following information for your property:

- **Premise Number: 123456-7**
- **Aqua Side Service Line Classification:**
- **Customer Side Service Line Classification:**
- **Regulatory Classification*:**

*Regulatory Classification is determined based on information available for both sides of the service line.



Please understand that inventorying and replacement efforts will take many years. We are developing detailed plans to meet these objectives. We will notify you if we require more information or need to arrange your service line replacement once we know the schedule for your area. Note that if you proceed with replacement of your service line using your own plumber, please contact us as soon as possible since we are required to replace the company-owned service line, if lead or galvanized, to minimize the risk of lead being released into your water.

HEALTH EFFECTS OF LEAD

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

STEPS TO REDUCE LEAD IN YOUR DRINKING WATER

Lead is more likely to accumulate when water is in contact with a lead source for longer periods of time. There are steps you can take to minimize exposure to lead in drinking water:

- **Run your tap to flush out lead.** If your water has not been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking. The amount of time to run the water will depend on the length and diameter of the service line and the amount of plumbing in your home.
- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **If you buy a water filter for lead removal, make sure it is approved to reduce lead.** The filter should be certified for lead removal by NSF. For more information, contact NSF International, www.NSF.org.

For more information on lead and our replacement program, please visit www.aquawater.com/lead.

Please note that when we begin working in your area, we will contact you to arrange inspections and service line replacements. This will provide you with the opportunity to verify your service line material. If you have other questions, please call our dedicated service line material call center hub at 1-866-SLM-AQUA (1-866-756-2782).

Sincerely,

Aqua

EXHIBIT B

Customer Surveys

Customer Lead and Copper Survey

To comply with Pennsylvania Public Utility Commission (PAPUC), Pennsylvania Department of Environmental Protection (PADEP) and Environmental Protection Agency (EPA) regulations, Aqua is compiling a database of the materials used in our customer's service lines. Please take a few minutes to complete this survey. If you have questions or would like assistance, please call ERM Call Center **(484) 913-0346** between the hours of 8am-6pm to schedule an appointment. Please state that you are calling about the **Aqua [PROJECT] Survey**.

To save time we provide a QR Code to complete this survey online:

(If you choose to complete this online, you may recycle these materials.)



First Name:

Last Name:

Phone: - -

Year home built:

If known, what type of material is the service line coming into your home? Please provide a picture for verification via email to LeadSurvey@erm.com or mail back with this survey. See included pipe identification instructions.

Lead
 Copper
 Plastic or PVC or PEX
 Galvanized

***If other or unknown please CALL (484) 913-0346 to verify**

Water Pipe and Service Line Material Identification

	Lead	Galvanized	Copper
Outer Appearance	Dull gray, bendable; Often curves between wall/floor and valve	Dark gray or black; Straight rigid pipe	Brown; Can have green corrosion spots
Threads at connections	None	Yes	None
Scratch Test (coin or key)	Shiny silver	Hard to scratch, remains gray	Copper, like a penny
Magnet Test	Does not stick	Magnet WILL stick	Does not stick

Please return completed survey in the enclosed self-address envelope to ERM c/o Melissa Marchisello, AQUA Pennsylvania
PO Box 950
Lansdale, PA 19446-9802



Para acceder al documento traducido al español, visite el sitio web de Aqua en <https://www.aquawater.com/aqua-pa-lead-spanish.php>

如果需要查看本文件的中文简体字译本, 请访问 Aqua 网站 : <https://www.aquawater.com/aqua-pa-lead-chinese.php>

Die deutsche Übersetzung dieses Dokuments finden Sie auf der Website von Aqua unter <https://www.aquawater.com/aqua-pa-lead-german.php>

How to Identify Water Service Line and Water Pipe Materials in Your Home

Water Service Line and Pipe Material Identification Instructions

Step 1

Locate the water service line entering your home which is usually located in the basement or a crawlspace. The service line is typically just before the whole-house shut-off valve which should be near where the water service enters the home.

Step 2

Use the identification sheet below to help identify your service line material (copper, lead, galvanized or plastic pipe).



- **Lead** – pipe is NOT threaded, it is soft, easily scraped, dull silver-gray in color, and a magnet does NOT stick to the pipe. Use flat edge of a screwdriver (or similar tool) to scrape the pipe. If the scraped area is shiny and silver, the line is lead.
- **Copper** – the color of a penny and not threaded
- **Galvanized** – pipe is threaded, dull silver-gray in color, and magnet will typically stick to the pipe
- **Plastic** – white, blue, or black rigid plastic pipe

Follow these steps:

You will need:

- Key or a coin
- Strong refrigerator magnet

1. Find the water meter in your basement. Look at the pipe that comes through the outside wall of your home and connects to your meter.
2. Carefully scratch the pipe (like you would a lottery ticket) with a key or a coin. Do not use a knife or other sharp tool. Take care not to make a hole in the pipe. If the scratch turns a shiny silver color, it could be lead or steel. **NOTE: If pipe is painted, use sandpaper to expose the metal first.**
3. Place the magnet on the pipe. If a magnet sticks, it is a steel pipe.



Other ways you can check for lead:

- Purchase a lead test kit at a hardware or home improvement store. These kits test what the pipe is made from – not the water inside. Look for an EPA recognized kit.
- A **licensed and insured plumber** can inspect your pipes and other plumbing for lead or steel. Replacing an older brass faucet or valve might reduce the lead in water.


Thank you for taking time out of your busy schedule to complete and return this survey. The data collected will help us to provide an accurate inventory of water service line materials in your community to eliminate lead from service lines.

Please return completed survey in the enclosed self-address envelope to ERM c/o Melissa Marchisello, AQUA Pennsylvania
PO Box 950
Lansdale, PA 19446-9802

PA-HUB-SL40-2412

EXHIBIT C

Construction and Maintenance Activities
Discover Lead Line Form

 An Essential Utilities Company	Premises No.: _____ Tap Serial No.: _____ Date: _____
	Address: _____
	Prepared by: _____
	PWSID: _____ System Name: _____

ESTE DOCUMENTO CONTIENE INFORMACIÓN IMPORTANTE ACERCA DE SU AGUA POTABLE.
HAGA QUE ALGUIEN LO TRADUZCA PARA USTED, O HABLE CON ALGUIEN QUE LO ENTIENDA.

An Important Health Notice From Aqua


PLEASE READ THIS BEFORE USING YOUR WATER!

During our maintenance/construction activities today, Aqua encountered:

- An Aqua-owned lead service line Copper
 An Aqua-owned galvanized service line

that provides water from our water main to the curb stop.

Please note that:

- It has been replaced today.
 It will be replaced by: _____

The customer-owned service line that provides water from the curb stop into your house is constructed of:


- Lead Galvanized Copper Other: _____

We encourage you to review the flushing instructions below and the information about lead on the back of this form. We will:

1. contact you to arrange for tap water sampling and
2. provide you with a pitcher filter to protect you from lead. Pitcher dropped off?

In the meantime, please call us if you would like additional information at 1-866-SLM-AQUA (1-866-756-2782).

Please review and follow these very important **instructions*** to minimize your exposure to metals, such as lead, which might have been stirred up due to the service-line replacement work. Please flush all your faucets using these steps:

-  **1** If possible, remove faucet aerators from all water faucets in the home.
- 2** Beginning in the lowest level of the home, fully open the cold water faucets throughout the home.
- 3** Let the water run for at least 30 minutes at the last faucet you opened (which was on your top floor).
- 4** Turn off each faucet starting with the faucets in the highest level of the home. Be sure to run water in bathtubs and showers as well as faucets.
- 5** Clean and reinstall any aerators you might have removed in Step 1.
- 6** Do not consume tap water, open hot water faucets, or use icemaker or filtered water dispenser until after flushing is complete.

*Based on the American Water Works Association-recommended safety procedures (awwa.org).

You might also wish to use a NSF-approved home filter for water to be used for drinking and cooking, particularly if you are pregnant or have children under age six. Go to NSF.org for more information.

Please see the other side of this notice for more information on lead. Thank you for letting Aqua serve you! For questions or concerns, please contact Aqua customer service line call center at **1-866-SLM-AQUA (1-866-756-2782)**.

More helpful information on the back



Information About Lead and Drinking Water*



How does lead get into drinking water?

Lead is not typically found in the streams, reservoirs or wells that serve as our water supplies. The main water lines that carry water from treatment plants to customers don't contribute to lead. The main source of lead in drinking water is from lead service lines (the pipelines that deliver water from the water mains in the street to homes) and from household plumbing that contains lead.

Before the use of copper for water pipes, lead was once a material of choice. Before 1986, lead was also a key component of the solder used by plumbers when installing home plumbing. Lead is even found in brass and bronze plumbing fixtures. The chemical properties of water can cause lead and other metals to leach into the water. Water utilities, including Aqua, treat drinking water to reduce the chance for metals to leach into the water.

Customers who have, or think they might have, lead service lines are strongly encouraged to replace their service lines. If customers choose to replace their household plumbing, they should use certified lead-free solder and fixtures.

How Aqua protects its customers:

Aqua conducts required testing for drinking water contaminants, including lead and copper, to ensure compliance with state and federal drinking water standards. Aqua also tests for lead in high-risk sample homes to comply with the U.S. Environmental Protection Agency's (EPA) lead and copper rule. According to the EPA, sampling locations must be selected based on priority tied to possible lead exposure. Aqua also works with individual customers who request lead information for their home. Test results, including those for lead and copper, are summarized in our annual water quality reports, which are produced for every water system we own and operate. You can find your community's water quality report on AquaWater.com.

Changes in water sources are not common. However, if we ever need to use a new water source, Aqua works with state environmental regulators to perform an early evaluation of the new source to anticipate water quality concerns and identify potential treatment needs.

Once a new water source is approved, Aqua further verifies the acceptability of water quality by conducting testing at approved high-risk homes for a sustained period of time to ensure water quality.

Health effects of lead:

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

If your home's water shows elevated levels of lead, or if you are concerned about the potential of lead in your water, here are ways you can minimize exposure.

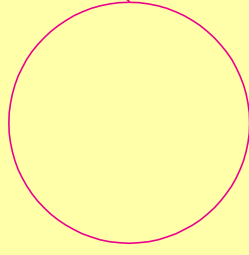
- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run water for at least 15 to 30 seconds or until it becomes cold or reaches a steady temperature before using it for drinking or cooking.
- **Use cold water to cook and prepare baby formula. Don't boil water to reduce lead.** Lead dissolves more easily into hot water. Boiling water won't reduce lead.
- If you buy a water filter, make sure it's approved to reduce lead. You can contact NSF International at 800.NSF.8010 or NSF.org.
- If you are concerned about exposure, contact your local health department or healthcare provider to find out how you can get your child tested for lead. Call Aqua at 877.987.2782 for information about testing your water for lead.
- Brass faucets, fittings and valves – even those advertised as lead free – might contribute lead to drinking water. The law allows end-use fixtures, such as faucets, with wetted surfaces containing a maximum weighted average of 0.25 percent lead to be labeled as lead free. Visit NSF International at NSF.org to learn more.

For more information on reducing lead exposure in your home and the health effects of lead, visit the EPA at EPA.gov/lead or contact your healthcare provider.

*This information sheet contains regulatorily required or recommended language and nothing herein is intended as, nor should be construed as, a promise of or contract for payment or reimbursement of expenses incurred for any action you take on account of this information sheet.

EXHIBIT D

Door Hanger



IMPORTANT NOTICE

AQUA.

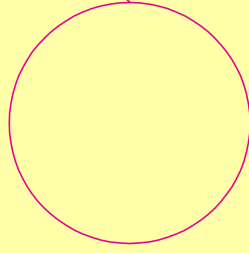
An Essential Utilities Company

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PA-HUB-SL50-2412



We're sorry...we missed you!

A company representative was at your property today.

Date: _____ Time: _____

The purpose(s) of our visit was to:

D Gain Access to Conduct Service Line Inspection

D Other/Comments: _____

* If unable to provide access for service line inspection, please fill out the survey provided via mail and/or QR code. The QR Code is located below. If you have questions, please contact the ERM Call Center via the information provided below.

Please Contact Us
ERM Call Center: (484) 913-0346
Or email at Leadsurvey@erm.com

QR Code: Bensalem/Bristol



An Essential Utilities Company

EXHIBIT E

10 Day Shutoff Notice

10-Day Shut Off Notice

DATE NOTICE ISSUED:

Name:

Service Address:

Premise No.

In order for Aqua Pennsylvania, Inc. to continue supplying water service to your residence/business, you need to take immediate action. If the information **marked** below is not provided within the next 10 days, we will shut off the water service at the above address on or after 8:00 A.M. on _____. **Aqua may act on this notice for up to 60 days.**

THIS ACTION WILL BE TAKEN FOR THE FOLLOWING REASON:

1. Your Bill For \$ _____ is Overdue. Call 1.877.987.2782 (and choose Collections).

2. Meter Operations:

- ACT 120 Lead Service Line Inspection or Replacement. Call 610.645.4272 to speak with Water Quality.
- Inactive Account - Apply for Water Service
- Meter Equipment Inspection Exchange or Install Meter Meter Space Does Not Meet Aqua PA Specifications
- Customer side leak, property owner responsibility. Call 1.877.987.2782 to update repair status

Other: _____ Call 1.877.WTR.AQUA or 1.877.987.2782.

3. Backflow Prevention: Failure to Test Backflow Device SEPA 610.541.4179 or backflow@aquawater.com
 Failure to Install Backflow Device GPA 1.877.987.2782 or gpabackflow@aquawater.com

TO STOP THE SHUT OFF, YOU MUST DO THE FOLLOWING IMMEDIATELY:

1. Pay the total amount overdue. To pay by phone, call our toll-free number at 866-269-2906 or see the back of the payment stub for all payment options. If we shut off your water, you may have to pay the following charges to have your water turned back on: Overdue Amount \$_____; Turn-On Charge \$_____; Payments will not be accepted by our representative. It must be paid at an authorized payment location (call Aqua for the nearest payment location's address).
2. Contact Aqua during normal business hours at 877.987.2782 (Select Collections) to let us know you made a payment in full (or in full of past due amounts of the most recent payment arrangement), to make a payment arrangement, dispute an overdue bill, the grounds for termination are otherwise eliminated, or learn about **Aqua's Customer Assistance Program**. You can also contact Aqua at our address above.
3. Call 877.987.2782 during normal business hours (Select Collections) if you or someone in your home has a serious illness or a medical condition.
 - Comunicarse con Aqua al 877.987.2782 (elija "Bobranzas" - "Collectiones" en inglés) para hacernos saber que realizó el pago, o para disputar el balance atrasado. También puede comunicarse con Aqua a la dirección que aparece arriba.
 - Attention! Este es en mensaje muy importante. Si usted no lo entiende, favor de llama a 877.987.2782.

If you have questions or need more information, contact us as soon as possible at 877.987.2782. After you talk to us, if you are not satisfied, you may file a complaint with the Public Utility Commission. The Public Utility Commission may delay the shut off if you file the complaint before the shut off date. To contact them, call 1.800.692.7380 or write to the Pennsylvania Public Utility Commission, P.O. Box 3265, Harrisburg, Pennsylvania 17105-3265.



762 W. Lancaster Avenue
Bryn Mawr, PA 19010-3489

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IMPORTANT TO KNOW - BEFORE WE SHUT OFF YOUR UTILITY SERVICE

- **If we shut off your service during the winter months (between Dec. 1 - Mar. 31)** we will restore your service within 24 hours of your meeting all requirements/conditions to have service reconnected. Where street digging is required it may take up to 7 days.
- If you are a victim of domestic violence and have a Protection From Abuse Order (PFA) or other court order that shows clear evidence of domestic violence, there are special protections available. **Call us immediately at 877.987.2782.** (You will be required to provide us with a copy of the order.)
- **If you need help to pay your bill**, you may be eligible for a payment arrangement or **debt forgiveness through Aqua's Customer Assistance Program.** Call **877.987.2782 right away** to provide us with household income and occupant information. You may be required to provide proof of your income.
- If your landlord pays your utility bill: You have certain legal protections. Please call us at 877.987.2782.
- If you have trouble understanding or speaking English or have a disability please call us at 877.987.2782 for free interpretation.
- If your service is shut off, you may be required to pay more than the amount listed on the front of this notice to have your service turned back on. You may have to pay any additional bills that have become past due.
- All adult occupants of the premise whose name appears on the mortgage, deed, or lease are considered "customers" and are responsible for payment of this bill.
- If service is shut off, ANY adult occupant who has been living at the premise may have to pay all or portions of this bill to have service restored.
- If your service is shut off, you must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premise.
- After all conditions have been met to have the service turned back on, it may take up to 7 days to have your service restored. Please contact us to discuss the details.
- If you need water to heat your property, please contact Aqua immediately at 877.987.2782 (and choose Collections) so we can arrange a service visit to verify that need. The company will act in accordance with the public utility laws with respect to water service shut offs.

MEDICAL EMERGENCY NOTICE

Let us know if someone living in your home is seriously ill or has a medical condition.

WE WILL NOT SHUT OFF YOUR SERVICE provided you:

A. Provide a medical certification by a licensed physician, nurse practitioner or physician's assistant.

Medical certifications must be in writing and signed by your physician, nurse practitioner or physician's assistant by fax, email or mail within three days.

AND

B. Make some equitable arrangements to pay your current bills for service.

Call **Aqua at 877.987.2782** to let us know about your medical emergency.

FAX: 610.520.2168 or toll-free at 866.780.8301

**ATTN: Collections Department
Aqua Pennsylvania, Inc.
762 W. Lancaster Avenue
Bryn Mawr, PA 19010**

EXHIBIT F

Customer Agreement



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LICENSE AGREEMENT TO REPLACE THE CUSTOMER OWNED LEAD/GALVANIZED SERVICE LINE

The undersigned customer(s) or property owner(s) (the “Customer”), through this License Agreement, grants Aqua Pennsylvania, Inc. (“Aqua” or the “Company”) and its contractors and/or subcontractors a license to enter upon the Customer’s property at the service address set forth below (the “Property”) for the purpose of replacing the Customer-owned lead or galvanized service line with a new Customer-side service line and connecting the new Customer-side service line to the Company’s facilities, at no direct cost to the Customer.

Service
Address: _____

City: _____ State: _____ Zip: _____

The Customer represents that the Customer is the sole legal owner of the Property and has sole authority to agree to this License Agreement. The term of this License Agreement shall be valid until the Company or its contractor/subcontractor completes the replacement of the Customer-side service line and restoration.

The Company owns the Company-side service line from the Company’s water main to the curb stop, meter pit, or valve (as applicable) at or near the Customer’s property line. The Company, in its sole discretion has determined the location of the Company-side service line. The Company-side service line will be owned and maintained by the Company.

The Company or the Company’s contractor and/or subcontractor shall replace the Customer-owned lead or galvanized service line with a new service line of size and material determined by the Company. The Customer-owned lead or galvanized service line will be abandoned in place. The Company shall connect the new Customer-side service line to the Company’s connecting facilities and the Customer’s premises. It may be necessary for the Company or Company’s contractor to gain entry into the Customer’s premises to make the connection at the meter with the new Customer-side service line. The ownership of the new Customer-side service line will be dedicated to the Customer at the completion of the replacement. Ownership and maintenance responsibilities of the new Customer-side service line will remain with the Customer.

Following the replacement of the Customer-side service line, the Company will restore the Customer's Property as reasonably as practicable to the condition prior to the commencement of the replacement under this License Agreement. The Company warrants the workmanship and materials of the installation of the new Customer-side service line and restoration of surfaces for a period of two (2) years from the date the replacement is completed. The date the replacement is completed is the date water service is re-established to the Property.

The maximum coverage under the warranty on the workmanship and materials is limited to an amount up to Twenty Thousand Dollars (\$20,000.00) and limited to repairing or replacing the Customer-side service line if the failure was due to the workmanship and materials of the replacement, and restoration of surfaces which shall mean restoration as reasonably as practicable to the condition that existed prior to the replacement under this License Agreement. The Company shall not be liable for any damages beyond the maximum coverage of the two year warranty as described in this License Agreement. Should any repair be necessary under this warranty, the Customer grants Aqua and its contractors and/or subcontractors license to enter upon the Customer's Property to complete the repairs.

In consideration of the Company performing the Customer-side service line replacement at no direct cost to the Customer and receiving the associated warranty on workmanship and materials and restoration of surfaces as set forth above, the Customer agrees to indemnify, release and hold harmless the Company and its affiliates, agents, and contractors and/or subcontractors from and against all claims, liabilities, and costs arising from acts and omissions of the Company and/or its contractors and/or subcontractors in replacing and installing the new Customer-side service line that are outside of the associated warranty on workmanship and materials and restoration of surfaces. The Company and/or its contractors and/or subcontractors shall not be responsible for any pre-existing condition present at the Property, including, but not limited to, pre-existing conditions of the structures, other improvements, or other utility or customer service lines at the Property. The Customer specifically agrees to accept dedication of the newly installed Customer-owned portion of the service line upon completion of its installation.

PLEASE RETURN A SIGNED COPY OF THIS LICENSE AGREEMENT IN THE PRE-ADDRESSED, POSTAGE PAID, ENVELOPE TO:

**Aqua Pennsylvania, Inc.
762 W. Lancaster Ave.
Bryn Mawr, PA 19010
Attention: Water Quality Department**

Contract No.

CUSTOMER

AQUA PENNSYLVANIA, INC.

Signature: _____ Signature: _____

Printed Name: _____ Printed Name: _____

Date: _____ Title: _____

Phone: _____ Date: _____

EXHIBIT G

Customer Letter – Lead Material Identified



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Date

Address

Dear Aqua Customer,

Aqua Pennsylvania is implementing a lead line replacement program. Our records show that the service line at the above address is, or may be, comprised of lead.

The water service line serving your property includes a section of pipe from the water main to the curb (curb stop) that is “company-owned.” There is a second section of pipe extending from the curb stop to your home that is “customer-owned.” It is the property owner’s responsibility to maintain the customer-owned service line.

Aqua can replace, AT NO DIRECT COST TO YOU, your customer-owned service line from the curb line to the connection with the water meter inside your building/house. Our contractor will excavate/tunnel from the water main to your building/house and enter your building/house to disconnect the lead service line and connect the new one. The new customer-owned service line will then be turned over to you to own and maintain as a part of your property.

To move forward with this program, please call 610.645.4272. Please leave a message that you would like your lead service line replaced with your name, address, and phone number. Someone will call you back by the next business day.

Please note that refusal to replace the lead service line may result in termination of water service to the property.

We thank you in advance for your support of this program.

Sincerely,

Ann Dreyer
Supervisor, Water Quality Services

Attachments: Lead Fact Sheet

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An  Essential Utilities Company

Aqua Wants Our Customers to Be Informed*

Este documento contiene información importante acerca de su agua potable. Haga que alguien lo traduzca para usted, o hable con alguien que lo entienda.

Here's what you should know about lead and drinking water.

Lead is not typically found in the streams, reservoirs or wells that serve as water supplies or in the main water lines that carry water from treatment plants to homes. Yet, the chemical properties of water can cause lead and other metals to leach into drinking water. The main source of lead in drinking water is from lead service lines (the pipes that deliver water from water mains in the street and into homes) and from typical household plumbing (lead solder and brass fixtures) that contains lead. Households that have, or suspect having, lead service lines or lead in their household plumbing are strongly encouraged to replace them. The use of lead in solder was prohibited after 1986, so buildings constructed after then should not have contained lead in the solder.

How Aqua protects its customers:

Water utilities, including Aqua, treat drinking water to reduce the chance for metals to leach into the water. Aqua conducts required testing for drinking water contaminants, including lead and copper, to ensure compliance with state and federal drinking water standards. Aqua tests the water at our treatment plants, and also schedules customer tap sampling and tests for lead in potential high-risk areas, to comply with the U.S. Environmental Protection Agency's (EPA) lead and copper rule.

You can always view your community's test results. They are summarized in our annual water quality reports, which are produced for every water system we own and operate.

Lead Service Line Replacement Program:

Aqua can now assist customers with replacing the customer/property owner's portion of the service line if it is made of lead. Aqua's new program will allow us to work with customers, either during a main replacement project or by customer request, to replace the customer/property owner's portion of the service line if it is lead and dedicate the service line back to the customer/property owner at no direct cost to the customer/property owner.

Visit our website at <https://www.aquawater.com/lead> for more information.



Call us at
1-866-SLM-AQUA
(1-866-756-2782)
for more information.



You can find your community's
water quality report at
[AquaWater.com](https://www.aquawater.com).

More helpful information on the back 



If you are a residential customer:

You should know that there are parts of the service line bringing water to your home that are Aqua's property (the pipe that goes from our water main in the street to your curb) and parts of the service line that are the property owner's (the pipe that goes from your curb to your home). When we encounter lead service lines during our maintenance and construction activities, we will seek to identify the material type of both portions (Aqua's and the property owner's) of the service line. If we find lead on Aqua's side only, Aqua will replace its portion of the service line. If we find lead on the customer/property owner's side, we will work with you to replace the customer/property owner portion. Disturbing a service line that contains lead, including the replacement of your lead service line, could result in temporary elevated lead levels in your drinking water.

If you have concerns regarding your internal plumbing, we recommend that you have a licensed plumber check the pipes that are your property. This is important to know, because household plumbing can also be a source of lead in tap water. See the section below on "what you can do" for minimizing your risk if this happens.

For more information about Aqua's Lead Program please call our call center hub at 1-866-SLM-AQUA (1-866-756-2782)



If you are a school or day care center:

You should know that the EPA has established more stringent sampling procedures for schools and day care centers. Because children often drink from fountains and faucets at school without flushing the water first, and because they are at higher risk of health effects due to exposure, for their protection, sampling is done differently at schools and day care centers.

Aqua suggests that you call the EPA's safe drinking water hotline at 800.426.4791 or email them using this URL: <https://www.epa.gov/lead/forms/lead-hotline-national-lead-information-center>. Specific information regarding schools can be found on EPA's website at <https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water>. It's important for any testing you do to be conducted using EPA protocols, so that the results are meaningful.

The health effects of lead:

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems.

If you are concerned about lead exposure:

- Contact your local health department or healthcare provider to find out how you can get your child tested for lead.
- Visit the EPA at [EPA.gov/lead](https://www.epa.gov/lead) for more information on the health effects of lead or reducing lead exposure in your home.
- Call Aqua at 877.987.2782 for information about testing your water.

What you can do:

If your home's water shows elevated levels of lead, or if you are concerned about the potential of lead in your water, below are ways you can minimize your exposure.

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Don't boil water to reduce lead. Lead dissolves more easily into hot water and boiling will concentrate the lead. Boiling water won't reduce lead.
- If you buy a water filter for lead removal, make sure it's approved to reduce lead. Contact NSF International, www.NSF.org.

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EXHIBIT H

Lead Fact Sheet

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If you have concerns regarding your internal plumbing, we recommend that you have a licensed plumber check the pipes that are your property. This is important to know, because household plumbing can also be a source of lead in tap water. See the section below on "what you can do" for minimizing your risk if this happens.

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- **Use cold water to cook or prepare baby formula.** Don't boil water to reduce lead. Lead dissolves more easily into hot water and boiling will concentrate the lead. Boiling water won't reduce lead.
- If you buy a water filter for lead removal, make sure it's approved to reduce lead. Contact NSF International, www.NSF.org.

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EXHIBIT I

Lead Service Line Replacement Program Information Sheet

Customer Lead Service Line Replacement Program Information Sheet



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BACKGROUND – AQUA CUSTOMER LEAD SERVICE LINE REPLACEMENT PROGRAM

Lead is a naturally occurring metal that can cause a variety of adverse health effects. While the most common sources of lead exposure are soil, paint chips and dust, drinking water is another route of lead exposure, primarily as a result of corrosion of lead pipes and plumbing materials. The Pennsylvania General Assembly determined it is in the public interest for water utilities to assist customers in the replacement of customer-owned lead, or galvanized requiring replacement (“galvanized”), service lines throughout Pennsylvania.

The service line that provides water service to a property is made up of two parts: a Company-owned portion (which connects from the Company’s main to the curb line) and a customer-owned portion (which connects from the curb line to a customer’s structure). Customers, or property owners if the customer is not the property owner (“Customer”) are required to maintain and repair the Customer-owned portion of the service line.

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”), as Receiver for the Rhodes Water Utilities, now has been granted the authority to assist Customers in replacing the Customer-owned portion of the service line if that service line is identified as lead or galvanized. The Rhodes Water Utilities include Cooperstown Water Company, Fryburg Water Company, Plumer Water Company, Sugar creek Water Company, Venango Water Company, and West Hickory Water Company.

CUSTOMER-OWNED LEAD SERVICE LINE REPLACEMENT PROGRAM

Under the Customer Lead Service Line Replacement Program (“Replacement Program”), Aqua will identify customer-owned service lines that are lead or galvanized, enter into an agreement with the Customer to replace the Customer-owned portion of the service line and restore the Customer’s property at no direct cost to the customer, dedicate the newly installed customer portion of the service line back to the Customer, and provide a warranty on the work completed to replace the Customer-owned lead or galvanized service line.

Aqua’s Replacement Program is made up of two parts: (1) replacements in connection with a main replacement project, and (2) replacements per Customer request not associated with a main replacement project.

Cap on Replacements Per Year

Aqua can perform up to 10 customer-owned lead or galvanized service line replacements per year in each of the Rhodes Water Utilities systems.

Customer Agreement and Replacement

In order for Aqua to complete a replacement, the Customer must enter into an agreement with Aqua to replace the Customer-owned lead or galvanized service line. Aqua cannot replace the Customer portion of a lead or galvanized service line without first entering into an agreement. The agreement provides that the Customer will give access to Aqua, or Aqua's contractor, to complete the replacement. To facilitate a smooth customer service line replacement, all property and appliances near where the service line enters the building at the exterior and interior wall must be moved by the homeowner prior to the replacement appointment. Following replacement, Aqua, or Aqua's contractor, will restore the property as reasonably as practicable to its former condition prior to the replacement of the Customer-owned lead or galvanized service line.

Dedication of Newly Installed Customer Portion of Service Line and Warranty

After the new Customer-owned portion of the service line is installed, the Customer-owned portion will be dedicated to the Customer and ownership and responsibility for repair and maintenance of the Customer-owned portion of the service line will remain with the Customer as was the case prior to the replacement. A two-year warranty on the workmanship and materials of the installation and the restoration of surfaces shall be provided.

Coordination of Replacements

Aqua will strive to group customer requested replacements within its operating divisions to create efficiencies. However, Aqua may replace a Customer's lead or galvanized service line if projects cannot be grouped together in its discretion.

Filters, Sampling and Testing

Upon identification of a customer lead or galvanized service line, Aqua will provide a National Sanitation Foundation approved water filter (pitcher or tap filter) and six months of replacement filters. At approximately 3-6 months after replacement is completed, Aqua will offer water sampling materials to Customers or residents, and if Customer or resident wants to have samples taken, Aqua will collect, test, and provide the results from those samples.

Reimbursement for Customers that Have Already Replaced a Lead or Galvanized Service Line

As part of Aqua's Replacement Program, Aqua will, subject to certain requirements discussed below, provide a reimbursement to those Customers that have replaced their Customer-owned lead or galvanized service line at their own cost within one year before or after a lead service line replacement project commencement and within one mile of the project area. If a Customer or property owner refuses or fails to accept the Company replacement of the lead or galvanized customer service line, the Customer or property owner will only be eligible for reimbursement if they replace their Customer

lead or galvanized service line at the customer or property owner's expense, within one year of the lead service line project commencement.

Reimbursement will occur for those Customers that provide documentation sufficient, in Aqua's sole discretion, to verify that the Customer replaced the Customer-owned lead or galvanized service line within one year before or after the start of a planned lead service line replacement project main replacement and as long as the Customer is within one mile of the main replacement project or focused replacement area. Customers will be eligible for reimbursement up to 125% of the average cost of Aqua's lead and galvanized replacements. Average cost used to determine reimbursement amounts during a calendar year will be based on Aqua's prior calendar year average costs for lead and galvanized service line replacements. Examples of documentation required by Aqua for a Customer to be eligible for reimbursement include, but are not limited to, detailed estimates from a licensed plumber and paid invoices or statements. A verified statement may also be submitted from the licensed plumber.

Aqua shall make reasonable best efforts to assist a Customer or property owner, if the Customer is not the property owner, through the reimbursement process and, to the extent possible, make determinations in favor of the Customer or property owner where the Customer or property owner has provided reasonable evidence of a customer lead or galvanized service line replacement to Aqua. However, the documentation provided to Aqua must be sufficient in the Aqua's opinion that a customer lead or galvanized service line replacement occurred.

Partial Replacements Prohibited

Under the Pennsylvania Public Utility Commission's ("PUC") regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line. If a Customer causes a partial replacement, by replacing the Customer portion of a lead or galvanized service line without notifying Aqua, Aqua is required to terminate service until a full replacement of the lead or galvanized service line can be completed.

In addition, any Customer that refuses to allow Aqua (or its contractor) to replace the lead or galvanized service line, or refuses to employ its own licensed plumber to replace the lead or galvanized service line, will result in termination of service to the property until the entire lead or galvanized service line is replaced.

Aqua shall use Step In Rights as described in Aqua's tariff to perform a replacement if the customer or occupier of the property is not the owner, and the customer or occupier provides a medical certificate or a Protection From Abuse order (or other court order issued by a court of competent jurisdiction in this Commonwealth which provides clear evidence of domestic violence), subject to the requirements in Aqua's tariff. Aqua may use Step In Rights where the customer or occupier is not the property owner if Aqua has attempted to contact the property owner with an offer to replace the Customer lead service line and has not received a response or the property owner cannot be identified.

CONCLUSION

Aqua recognizes the importance of removing lead from water systems across Pennsylvania both on Aqua owned and Customer-owned assets. Aqua looks forward to working with Customers to achieve this goal.

EXHIBIT J

Post-Replacement Flushing Instructions

Para acceder al documento traducido al español, visite el sitio web de Aqua en <https://www.aquawater.com/aqua-pa-lead-spanish.php>

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<https://www.aquawater.com/aqua-pa-lead-chinese.php>

Die deutsche Übersetzung dieses Dokuments finden Sie auf der Website von Aqua unter <https://www.aquawater.com/aqua-pa-lead-german.php>

ESTE DOCUMENTO CONTIENE INFORMACIÓN IMPORTANTE ACERCA DE SU AGUA POTABLE. HAGA QUE ALGUIEN LO TRADUZCA PARA USTED, O HABLE CON ALGUIEN QUE LO ENTIENDA.

An Important Health Notice From Aqua*



PLEASE READ THIS BEFORE USING YOUR WATER!

As part of Aqua's Customer-Owned Lead Service Line Replacement Program ("Replacement Program"), Aqua, or Aqua's contractor, replaced your customer-owned lead or galvanized service line. Before using your water please follow the flushing instructions below:

Please review and follow these very important instructions¹ to minimize your exposure to metals, such as lead, which might have been stirred up due to the service-line replacement work. Please flush all your faucets using these steps:

1



If possible, remove faucet aerators from all water faucets in the home.

4

Turn off each faucet starting with the faucets in the highest level of the home. Be sure to run water in bathtubs and showers as well as faucets.

2

Beginning in the lowest level of the home, fully open the cold water faucets throughout the home.

5

Clean and reinstall any aerators you might have removed in Step 1.

3

Let the water run for at least 30 minutes at the last faucet you opened (which was on your top floor).

6

Do not consume tap water, open hot water faucets, or use icemaker or filtered water dispenser until after flushing is complete.

¹ Based on the American Water Works Association-recommended safety procedures (awwa.org).

You might also wish to use a NSF-approved home filter for water to be used for drinking and cooking, particularly if you are pregnant or have children under the age six. Go to NSF.org for more information.

Please visit Aqua's website for more information concerning Aqua's Replacement program at www.aquawater.com/lead. Thank you for letting Aqua serve you! For questions or concerns, please contact Aqua customer service at **1-866-SLM-AQUA (1-866-756-2782)**.

EXHIBIT K

Pitcher Filter and Instruction Letter



BRITA® LONGLAST®

WATER FILTRATION SYSTEM

Longest-Lasting
Lead-Removing Filter*



10 CUP CAPACITY
1.9L • 64 FL. OZ. • 2.0 L
MADE IN POLYMER BLENDED
1 PITCHER / 1 FILTER

REDUCES
99% OF LEAD,
Mercury, Chlorine, Benzene and More
(See back panel for details)

FILTER LASTS

6
months*
100 Gallons

*See certifications.
*Approximate timing based on
100 gallons flow rate and average
home usage of 11 gallons per day.

BRITA
LONGLAST
WATER FILTRATION SYSTEM

Small Filter, Big Impact™

GREAT-TASTING WATER WITHOUT THE WASTE™

With Brita LONGLAST,® enjoy 6 months (120 gallons) of cleaner, great-tasting water. Change your filter less often and replace up to 1,800 bottles each year.*

*Standard 16.9 oz. single-use water bottles

GET TO THE GOOD STUFF — WHAT WE FILTER OUT

The Brita® Pacifica Pitcher with LONGLAST® Filter reduces the following impurities that may be in your tap water:

Heavy Metals	Lead, Mercury, Cadmium
Taste and Odor	Chlorine
Particulates	Particulate I
Pharmaceuticals	Estrone, Ibuprofen, Naproxen
Industrial Chemicals	Bisphenol A (BPA), Nonyl Phenol
Industrial Pollutants	Asbestos, Benzene

EASY SETUP

With quick setup, you can start using your Brita® today!

WASH YOUR HANDS BEFORE UNWRAPPING THE FILTER. DISCARD FIRST 3 PITCHERS OF WATER TO FLUSH OUT SYSTEM.



See User's Guide for detailed instructions. No presoak or rinse required! For best results, store the Brita® Pitcher in your refrigerator or out of direct sunlight.

GET MORE WITH BRITA®

Join now to receive custom filter replacement reminders, see the latest news and offers, earn points and claim rewards. Visit brita.com/register.

FILTER REPLACEMENT IS ESSENTIAL FOR PRODUCT TO PERFORM AS REPRESENTED.

REPLACE FILTER EVERY 120 GALLONS (ABOUT 6 MONTHS FOR THE AVERAGE FAMILY).

ES IMPORTANTE CAMBIAR LOS FILTROS PARA QUE EL PRODUCTO FUNCIONE SEGUN LO INDICADO.

CAMBIE EL FILTRO DESPUES DE CADA 120 GALONES (ALREDEDOR DE 6 MESES PARA LA FAMILIA PROMEDIO).

Pacifica Pitcher (model...)
LONGLAST® Filter
has been tested
the WQA against
standards 42, 53 and 401
of the claims.
Performance Data Sheet.



See below for instructions on using the Brita® pitcher filter based on Brita's User's Guide available at

<https://assets.ctfassets.net/oyntpw38l81s/4at4PbGRwEt3DzNPy3bdGS/fe99caa7b2f53863443861e5a10483d9/Shasta-Elite-User-Guide.pdf>

1. Hand wash* pitcher/dispenser, lid and reservoir. Rinse well. With clean hands, insert filter into reservoir by lining up groove in filter with ridge in reservoir. Press firmly for a tight seal.

*Do not wash in dishwasher. Do not use abrasive cleaners.

2. To set the filter life status indicator, press the STATUS button and hold it down for 6 seconds, until the green light next to ELITE™ FILTER blinks three times.

3. Open the lid and fill the reservoir with cold tap water.* Pour out the first 3 pitchers/first dispenser of water, or use to water plants.

*Hot water shouldn't be used with the Brita® Elite™ Filter (Max. 85°F/29°C – Min. 32°F/0°C).

4. To check filter life status, quickly press and release the STATUS button. When the light blinks red, you should replace your filter and reset the indicator (step 2), about every 6 months* for the average household.

*Approximate timing based on 120 gallon (454 litres) filter life and average family usage of 11 glasses per day.

Ve a continuación las instrucciones sobre cómo usar el filtro de la jarra Brita® basadas en la Guía del usuario de Brita disponibles en

<https://assets.ctfassets.net/oyntpw38l81s/4at4PbGRwEt3DzNPy3bdGS/fe99caa7b2f53863443861e5a10483d9/Shasta-Elite-User-Guide.pdf>

1. Lave a mano* la jarra/dispensador, tapa y depósito. Enjuague bien. Con las manos limpias, inserte el filtro en el depósito alineando la ranura del filtro con la muesca del depósito. Presione firmemente para un cierre hermético.

*No lave en el lavavajillas. No use limpiadores abrasivos.

2. Para activar el indicador del estado del filtro, presione el botón ESTADO (STATUS) y manténgalo apretado durante 6 segundos, hasta que la luz verde cerca del ELITE FILTER (FILTRO ELITE) titile tres veces.

3. Abra la tapa y llene el depósito con agua del grifo fría.* Vierta las 3 primeras jarras/el primer depósito de agua, o use para regar las plantas.

*No debe usar agua caliente con el filtro Elite™ de Brita® (Max. 85°F/29°C – Min. 32°F/0°C).

4. Para comprobar el estado del filtro, presione y suelte el botón ESTADO (STATUS) rápidamente. Cuando la luz titile en rojo, debe reemplazar el filtro y activar el indicador (paso 2), aproximadamente cada 6 meses* para un hogar promedio.

*El tiempo aproximado está basado en considerar que la vida del filtro es de 120 galones (454 litros) y que una familia promedio usa 11 vasos al día.

请参阅以下有关 Brita® 滤水壶的使用说明，该说明改编自 Brita 产品的用户指南，用户指南的网址为
<https://assets.ctfassets.net/oyntpw38l81s/4at4PbGRwEt3DzNPy3bdGS/fe99caa7b2f53863443861e5a10483d9/Shasta-Elite-User-Guide.pdf>

1. 用手清洗*滤水壶/配器、盖子和储水器。冲洗干净。用干净的那只手将过滤器插入储水器，将过滤器的凹槽与储水器中的凸起脊对齐。用力按压至密封。

*不要用洗碗机清洗。不要使用研磨性清洁剂。

2. 如果想设置过滤器使用寿命状态指示器，请按下“STATUS”按钮并持续按 6 秒钟，直到看见“ELITE FILTER”旁边的绿灯闪烁三次。

3. 打开盖子，在储水器内灌满冷自来水。*倒掉前三滤水壶/前一配器内的水，或用这些水浇灌植物。

*Brita® Elite™ 过滤器不能用来过滤热水（水温范围：最高 85 华氏度/29 摄氏度 - 最低 32 华氏度/0 摄氏度）。

4. 如果想检查过滤器使用寿命状态，请快速按下并放开 STATUS 按钮。当指示灯闪光为红色时，您应该更换过滤器并重新设置指示器（步骤 2），对于普通家庭来说，大约每 6 个月*需更换一次。

*大致的使用寿命时限，根据过滤器使用寿命时限内最多过滤 120 加仑（454 升）的水量及一个家庭平均每天使用 11 杯的水量来估算。

Im Folgenden finden Sie eine Anleitung zur Verwendung des Brita®-Kannenfilters, die auf der Brita-Bedienungsanleitung basiert, die Sie unter
<https://assets.ctfassets.net/oyntpw38l81s/4at4PbGRwEt3DzNPy3bdGS/fe99caa7b2f53863443861e5a10483d9/Shasta-Elite-User-Guide.pdf> finden.

1. Von Hand abwaschen* Krug/Spender, Deckel und Behälter. Gut ausspülen. Setzen Sie den Filter mit sauberen Händen in den Behälter ein, wobei Sie die Rille im Filter mit der Kante im Behälter ausrichten. Drücken Sie sie fest an, um sie dicht zu verschließen.

*Nicht in der Spülmaschine waschen. Verwenden Sie keine Scheuermittel.

2. Um die Filterlebensdaueranzeige einzustellen, drücken Sie die Taste STATUS und halten Sie sie 6 Sekunden lang gedrückt, bis die grüne Lampe neben ELITE FILTER dreimal blinkt.

3. Öffnen Sie den Deckel und füllen Sie den Behälter mit kaltem Leitungswasser.* Gießen Sie die ersten 3 Kannen/den ersten Wasserspender aus, oder verwenden Sie ihn zum Gießen von Pflanzen.

*Heißes Wasser sollte nicht mit dem Brita® Elite™ Filter verwendet werden (Max. 85°F/29°C – Min. 32°F/0°C).

4. Um den Status der Filterlebensdauer zu überprüfen, drücken Sie kurz auf die STATUS-Taste und lassen Sie sie wieder los. Wenn die Anzeige blinkt, sollten Sie den Filter austauschen und die Anzeige zurücksetzen (Schritt 2), was in einem durchschnittlichen Haushalt etwa alle 6 Monate* geschieht.

*Der ungefähre Zeitplan basiert auf einer Lebensdauer des Filters von 454 Litern und einem durchschnittlichen Familienverbrauch von 11 Gläsern pro Tag.

EXHIBIT L

Lead Service Line Replacement Close Out
Letter



Para acceder al documento traducido al español, visite el sitio web de Aqua en <https://www.aquawater.com/aqua-pa-lead-spanish.php>

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<https://www.aquawater.com/aqua-pa-lead-chinese.php>

Die deutsche Übersetzung dieses Dokuments finden Sie auf der Website von Aqua unter <https://www.aquawater.com/aqua-pa-lead-german.php>

[DATE]

Dear Customer:

Our records show that your service line has been replaced in the last three to six months. As detailed in the Customer Lead/Galvanized Service Line Replacement License Agreement, the Company has dedicated the newly installed customer-owned portion of the service line back to you and you are responsible for that service line as of the date of completion of the installation. Your warranty on the workmanship and materials of the newly installed Customer-side service line and restoration of the surfaces is for 24 months from the date the replacement was completed.

If you would like Aqua to sample the water at your premise, please contact Aqua at 610.645.4272. Aqua will provide sampling bottles and instructions for taking the samples as well as contact information for Aqua to arrange retrieval of the samples.

Lead in drinking water is primarily from materials and components associated with service lines and home plumbing in older homes. Aqua is responsible for providing high-quality drinking water to your home but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by running your water for a few minutes or until it becomes cold before using it for drinking or cooking.

Call me at 610.645.4234 if you have any questions.

Sincerely,

Ann Dreyer
Supervisor, Water Quality Services

EXHIBIT M

5th Liter Sampling Instructions

Aqua Pennsylvania
Sampling Instructions for Special Lead Analysis
For homes that had their Lead or Galvanized Service Line
Replaced

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Thank you for agreeing to collect samples following your lead/galvanized service line replacement. We recognize these instructions can be confusing. If you have any questions about the sampling protocol, please call us at 610.645.4272.

Please complete the back of these instructions with information on your home and when you collected the samples.

Sample Bottles – Five 1 Liter plastic bottles will be dropped off from Aqua Pennsylvania’s Bryn Mawr Lab. These bottles are specifically designed for lead and copper analyses.

Sample Location – Please sample from a kitchen or bathroom cold-water faucet. The water going to that faucet should not have any treatment such as a filter or a water softener. If you do have a treatment system, note that on the form. Each of the 5 bottles must be collected from the same faucet.

Sampling Procedure – Do not use any water in your house for a minimum of six (6) hours prior to sampling. We recommend sampling either early mornings or evenings upon returning home. Be sure to use a kitchen or bathroom cold water tap that has been used for drinking water consumption in the past few days. Do not intentionally flush the water line before the start of the 6-hour period. Do not remove the aerator prior to sampling.

A series of five samples will be collected. We suggest that you line up the bottles by number (1 through 5) and remove the caps.

Sample #1 (first draw): Place the opened sample bottle below the faucet and open the cold water tap as you would to fill a glass of water. Fill the sample bottle to the line marked “1000-ml” **without allowing any water to run into the sink and keep running the water.**

After sample # 1 has been filled, quickly place bottle # 2 under the faucet. Fill each bottle in order (1 through 5) while the water continues to flow from the faucet. After each of the 5 bottles has been filled, replace the caps, tighten the caps, and place the bottles back in the bags.

If any plumbing repairs or replacements have been done in the home within the last three years, please note this on the form.

After the samples have been collected, please call 610.645.4272 Monday through Friday so that a driver can be notified to pick up samples. If you are leaving a message on our voicemail, please leave your name, address, and number where you can be reached. Place samples bottles outside the front door for pick-up (if it is more appropriate to leave somewhere other than front door, please specify that when calling).

Results / Questions - The results from your samples and information about lead will be provided to you as soon as practical but no later than 30 days. However, if elevated lead levels are found, prompt notification will be provided within two working days after results are made available. Call 610.645.4272 if you have any questions regarding these instructions.

In order to process the samples, it is important that the resident complete this form and return with the 5 bottles.

Do you have a water softener or treatment system? Y / N

If so, was your softener or treatment bypassed when you took the samples? Y / N

Have you had any plumbing repairs or replacement in the last 3 years? Y/N If Yes, Explain:

Sample Location and faucet (i.e., kitchen sink) _____

Water was last used: Time: _____ Date: _____

Series of five water samples:

- Sample #1 was collected: Time: _____ Date: _____
- Sample #5 was collected: Time: _____ Date: _____

I have read the instructions and have taken the 5 tap samples in accordance with these instructions.

Signature

Date: _____

Name:

Phone number:

Address:

Mailing Address (if different):

EXHIBIT N

5th Liter Sample Results Letter



An Essential Utilities Company

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<https://www.aquawater.com/aqua-pa-lead-chinese.php>

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DATE

Name
Address

Dear [NAME] :

Below are the lead results for the water samples you collected from your property, following the 5th Liter sampling protocol instructions provided to you, on DATE.

	<i>1st Liter</i>	<i>5th Liter</i>
LEAD RESULT	ug/L	ug/L

ug/L = Micrograms per Liter or parts per billion
N.D. = Not Detected

The “Action Level” for lead in drinking water is 15 ug/L. “Action Level” is defined as the concentration of a contaminant which, if exceeded, triggers treatment or other requirements which a water system must follow.

Maximum Contaminant Level Goal (MCLG) is 0 ug/L. “MCLG” is defined as the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.

Lead in drinking water is primarily from materials and components associated with service lines and home plumbing in older homes. Aqua is responsible for providing high-quality drinking water but cannot control the variety of materials used in plumbing components. When your water has been sitting for several hours, you can minimize the potential for lead exposure by flushing your tap for a period of time it takes to bring in fresh water before using it for drinking or cooking.

The water supplied to this area meets all the National Primary Drinking Water Standards.

I have included an additional fact sheet on lead in drinking water for your information. Call me at 610.645.4234 if you have any questions.

Sincerely,

Ann Dreyer
Supervisor, Water Quality Services

EXHIBIT 01

Letter Provided If Customer Refuses Or
Does Not Respond To Requests For Aqua
To Access The Meter To Review The
Customer Service Line Material



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Date

Name
Address

Dear Customer:

In connection with Aqua's Lead Service Line Replacement Program, Aqua has attempted to contact you to identify your service line material to determine if your service line is lead or galvanized requiring replacement. You have either refused to allow Aqua to access your property or Aqua has not received a response from you.

Regarding access to identify service line material, Aqua must be allowed to identify the service line material that connects with Aqua's meter. Under the Pennsylvania Public Utility Commission's ("PUC") regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line (see 52 Pa. Code § 65.62). Since your service line material is not known, in accordance with PUC regulations Aqua is required to terminate service to your premise if permission is not granted to identify the service line material.

To avoid termination of service, please contact Aqua's Water Quality Department at 610.645.4234 to set up an appointment and to receive further information for Aqua or its representatives to identify your service line material.

Sincerely,

A handwritten signature in blue ink that reads "Michael Fili".

Michael Fili, Vice President
Capital Planning, Design & Construction
Aqua Pennsylvania, Inc.

Attachments: Lead Fact Sheet
Aqua Lead Service Line Replacement Program Information Sheet

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An  Essential Utilities Company

Aqua Wants Our Customers to Be Informed*

Este documento contiene información importante acerca de su agua potable. Haga que alguien lo traduzca para usted, o hable con alguien que lo entienda.

Here's what you should know about lead and drinking water.

Lead is not typically found in the streams, reservoirs or wells that serve as water supplies or in the main water lines that carry water from treatment plants to homes. Yet, the chemical properties of water can cause lead and other metals to leach into drinking water. The main source of lead in drinking water is from lead service lines (the pipes that deliver water from water mains in the street and into homes) and from typical household plumbing (lead solder and brass fixtures) that contains lead. Households that have, or suspect having, lead service lines or lead in their household plumbing are strongly encouraged to replace them. The use of lead in solder was prohibited after 1986, so buildings constructed after then should not have contained lead in the solder.

How Aqua protects its customers:

Water utilities, including Aqua, treat drinking water to reduce the chance for metals to leach into the water. Aqua conducts required testing for drinking water contaminants, including lead and copper, to ensure compliance with state and federal drinking water standards. Aqua tests the water at our treatment plants, and also schedules customer tap sampling and tests for lead in potential high-risk areas, to comply with the U.S. Environmental Protection Agency's (EPA) lead and copper rule.

You can always view your community's test results. They are summarized in our annual water quality reports, which are produced for every water system we own and operate.

Lead Service Line Replacement Program:

Aqua can now assist customers with replacing the customer/property owner's portion of the service line if it is made of lead. Aqua's new program will allow us to work with customers, either during a main replacement project or by customer request, to replace the customer/property owner's portion of the service line if it is lead and dedicate the service line back to the customer/property owner at no direct cost to the customer/property owner.

Visit our website at <https://www.aquawater.com/lead> for more information.



Call us at
1-866-SLM-AQUA
(1-866-756-2782)
for more information.



You can find your community's
water quality report at
[AquaWater.com](https://www.aquawater.com).

More helpful information on the back 



If you are a residential customer:

You should know that there are parts of the service line bringing water to your home that are Aqua's property (the pipe that goes from our water main in the street to your curb) and parts of the service line that are the property owner's (the pipe that goes from your curb to your home). When we encounter lead service lines during our maintenance and construction activities, we will seek to identify the material type of both portions (Aqua's and the property owner's) of the service line. If we find lead on Aqua's side only, Aqua will replace its portion of the service line. If we find lead on the customer/property owner's side, we will work with you to replace the customer/property owner portion. Disturbing a service line that contains lead, including the replacement of your lead service line, could result in temporary elevated lead levels in your drinking water.

If you have concerns regarding your internal plumbing, we recommend that you have a licensed plumber check the pipes that are your property. This is important to know, because household plumbing can also be a source of lead in tap water. See the section below on "what you can do" for minimizing your risk if this happens.

For more information about Aqua's Lead Program please call our call center hub at 1-866-SLM-AQUA (1-866-756-2782)



If you are a school or day care center:

You should know that the EPA has established more stringent sampling procedures for schools and day care centers. Because children often drink from fountains and faucets at school without flushing the water first, and because they are at higher risk of health effects due to exposure, for their protection, sampling is done differently at schools and day care centers.

Aqua suggests that you call the EPA's safe drinking water hotline at 800.426.4791 or email them using this URL: <https://www.epa.gov/lead/forms/lead-hotline-national-lead-information-center>. Specific information regarding schools can be found on EPA's website at <https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water>. It's important for any testing you do to be conducted using EPA protocols, so that the results are meaningful.

The health effects of lead:

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems.

If you are concerned about lead exposure:

- Contact your local health department or healthcare provider to find out how you can get your child tested for lead.
- Visit the EPA at [EPA.gov/lead](https://www.epa.gov/lead) for more information on the health effects of lead or reducing lead exposure in your home.
- Call Aqua at 877.987.2782 for information about testing your water.

What you can do:

If your home's water shows elevated levels of lead, or if you are concerned about the potential of lead in your water, below are ways you can minimize your exposure.

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Don't boil water to reduce lead. Lead dissolves more easily into hot water and boiling will concentrate the lead. Boiling water won't reduce lead.
- If you buy a water filter for lead removal, make sure it's approved to reduce lead. Contact NSF International, www.NSF.org.

*This information sheet contains regulatorily required or recommended language and nothing herein is intended as, nor should be construed as, a promise of or contract for payment or reimbursement of expenses incurred for any action you take on account of this information sheet.

Customer Lead Service Line Replacement Program Information Sheet



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BACKGROUND – AQUA CUSTOMER LEAD SERVICE LINE REPLACEMENT PROGRAM

Lead is a naturally occurring metal that can cause a variety of adverse health effects. While the most common sources of lead exposure are soil, paint chips and dust, drinking water is another route of lead exposure, primarily as a result of corrosion of lead pipes and plumbing materials. The Pennsylvania General Assembly determined it is in the public interest for water utilities to assist customers in the replacement of customer-owned lead, or galvanized requiring replacement (“galvanized”), service lines throughout Pennsylvania.

The service line that provides water service to a property is made up of two parts: a Company-owned portion (which connects from the Company’s main to the curb line) and a customer-owned portion (which connects from the curb line to a customer’s structure). Customers, or property owners if the customer is not the property owner (“Customer”) are required to maintain and repair the Customer-owned portion of the service line.

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”), as Receiver for the Rhodes Water Utilities, now has been granted the authority to assist Customers in replacing the Customer-owned portion of the service line if that service line is identified as lead or galvanized. The Rhodes Water Utilities include Cooperstown Water Company, Fryburg Water Company, Plumer Water Company, Sugar creek Water Company, Venango Water Company, and West Hickory Water Company.

CUSTOMER-OWNED LEAD SERVICE LINE REPLACEMENT PROGRAM

Under the Customer Lead Service Line Replacement Program (“Replacement Program”), Aqua will identify customer-owned service lines that are lead or galvanized, enter into an agreement with the Customer to replace the Customer-owned portion of the service line and restore the Customer’s property at no direct cost to the customer, dedicate the newly installed customer portion of the service line back to the Customer, and provide a warranty on the work completed to replace the Customer-owned lead or galvanized service line.

Aqua’s Replacement Program is made up of two parts: (1) replacements in connection with a main replacement project, and (2) replacements per Customer request not associated with a main replacement project.

Cap on Replacements Per Year

Aqua can perform up to 10 customer-owned lead or galvanized service line replacements per year in each of the Rhodes Water Utilities systems.

Customer Agreement and Replacement

In order for Aqua to complete a replacement, the Customer must enter into an agreement with Aqua to replace the Customer-owned lead or galvanized service line. Aqua cannot replace the Customer portion of a lead or galvanized service line without first entering into an agreement. The agreement provides that the Customer will give access to Aqua, or Aqua's contractor, to complete the replacement. To facilitate a smooth customer service line replacement, all property and appliances near where the service line enters the building at the exterior and interior wall must be moved by the homeowner prior to the replacement appointment. Following replacement, Aqua, or Aqua's contractor, will restore the property as reasonably as practicable to its former condition prior to the replacement of the Customer-owned lead or galvanized service line.

Dedication of Newly Installed Customer Portion of Service Line and Warranty

After the new Customer-owned portion of the service line is installed, the Customer-owned portion will be dedicated to the Customer and ownership and responsibility for repair and maintenance of the Customer-owned portion of the service line will remain with the Customer as was the case prior to the replacement. A two-year warranty on the workmanship and materials of the installation and the restoration of surfaces shall be provided.

Coordination of Replacements

Aqua will strive to group customer requested replacements within its operating divisions to create efficiencies. However, Aqua may replace a Customer's lead or galvanized service line if projects cannot be grouped together in its discretion.

Filters, Sampling and Testing

Upon identification of a customer lead or galvanized service line, Aqua will provide a National Sanitation Foundation approved water filter (pitcher or tap filter) and six months of replacement filters. At approximately 3-6 months after replacement is completed, Aqua will offer water sampling materials to Customers or residents, and if Customer or resident wants to have samples taken, Aqua will collect, test, and provide the results from those samples.

Reimbursement for Customers that Have Already Replaced a Lead or Galvanized Service Line

As part of Aqua's Replacement Program, Aqua will, subject to certain requirements discussed below, provide a reimbursement to those Customers that have replaced their Customer-owned lead or galvanized service line at their own cost within one year before or after a lead service line replacement project commencement and within one mile of the project area. If a Customer or property owner refuses or fails to accept the Company replacement of the lead or galvanized customer service line, the Customer or property owner will only be eligible for reimbursement if they replace their Customer

lead or galvanized service line at the customer or property owner's expense, within one year of the lead service line project commencement.

Reimbursement will occur for those Customers that provide documentation sufficient, in Aqua's sole discretion, to verify that the Customer replaced the Customer-owned lead or galvanized service line within one year before or after the start of a planned lead service line replacement project main replacement and as long as the Customer is within one mile of the main replacement project or focused replacement area. Customers will be eligible for reimbursement up to 125% of the average cost of Aqua's lead and galvanized replacements. Average cost used to determine reimbursement amounts during a calendar year will be based on Aqua's prior calendar year average costs for lead and galvanized service line replacements. Examples of documentation required by Aqua for a Customer to be eligible for reimbursement include, but are not limited to, detailed estimates from a licensed plumber and paid invoices or statements. A verified statement may also be submitted from the licensed plumber.

Aqua shall make reasonable best efforts to assist a Customer or property owner, if the Customer is not the property owner, through the reimbursement process and, to the extent possible, make determinations in favor of the Customer or property owner where the Customer or property owner has provided reasonable evidence of a customer lead or galvanized service line replacement to Aqua. However, the documentation provided to Aqua must be sufficient in the Aqua's opinion that a customer lead or galvanized service line replacement occurred.

Partial Replacements Prohibited

Under the Pennsylvania Public Utility Commission's ("PUC") regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line. If a Customer causes a partial replacement, by replacing the Customer portion of a lead or galvanized service line without notifying Aqua, Aqua is required to terminate service until a full replacement of the lead or galvanized service line can be completed.

In addition, any Customer that refuses to allow Aqua (or its contractor) to replace the lead or galvanized service line, or refuses to employ its own licensed plumber to replace the lead or galvanized service line, will result in termination of service to the property until the entire lead or galvanized service line is replaced.

Aqua shall use Step In Rights as described in Aqua's tariff to perform a replacement if the customer or occupier of the property is not the owner, and the customer or occupier provides a medical certificate or a Protection From Abuse order (or other court order issued by a court of competent jurisdiction in this Commonwealth which provides clear evidence of domestic violence), subject to the requirements in Aqua's tariff. Aqua may use Step In Rights where the customer or occupier is not the property owner if Aqua has attempted to contact the property owner with an offer to replace the Customer lead service line and has not received a response or the property owner cannot be identified.

CONCLUSION

Aqua recognizes the importance of removing lead from water systems across Pennsylvania both on Aqua owned and Customer-owned assets. Aqua looks forward to working with Customers to achieve this goal.

EXHIBIT 02

Letter Provided If The Customer Has An Identified COLSL And Refuses Or Does Not Respond To Requests To Replace The COLSL In Connection With A Main Replacement Project Or Where Aqua Is Replacing The Utility Side Service Line



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Die deutsche Übersetzung dieses Dokuments finden Sie auf der Website von Aqua unter <https://www.aquawater.com/aqua-pa-lead-german.php>

Date

Name
Address

Dear Customer:

In connection with Aqua's Lead Service Line Replacement Program, your customer-owned service line has been determined to be lead or galvanized requiring replacement and either you have refused to allow Aqua to replace the service line or Aqua has not received a response from you regarding the replacement of your service line.

In accordance with PUC regulations Aqua is required to terminate service to your premise as Aqua will be replacing the Company-owned side of the service line. Under the Pennsylvania Public Utility Commission's ("PUC") regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line (see 52 Pa. Code § 65.62).

To avoid termination of service, please contact Aqua's Water Quality Department at 610.645.4234 to set up an appointment and to receive further information for Aqua or its representatives to replace your lead or galvanized service line.

Sincerely,

A handwritten signature in blue ink that reads "Michael Fili".

Michael Fili, Vice President
Capital Planning, Design & Construction
Aqua Pennsylvania, Inc.

Attachments: Lead Fact Sheet
Aqua Lead Service Line Replacement Program Information Sheet

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An  Essential Utilities Company

Aqua Wants Our Customers to Be Informed*

Este documento contiene información importante acerca de su agua potable. Haga que alguien lo traduzca para usted, o hable con alguien que lo entienda.

Here's what you should know about lead and drinking water.

Lead is not typically found in the streams, reservoirs or wells that serve as water supplies or in the main water lines that carry water from treatment plants to homes. Yet, the chemical properties of water can cause lead and other metals to leach into drinking water. The main source of lead in drinking water is from lead service lines (the pipes that deliver water from water mains in the street and into homes) and from typical household plumbing (lead solder and brass fixtures) that contains lead. Households that have, or suspect having, lead service lines or lead in their household plumbing are strongly encouraged to replace them. The use of lead in solder was prohibited after 1986, so buildings constructed after then should not have contained lead in the solder.

How Aqua protects its customers:

Water utilities, including Aqua, treat drinking water to reduce the chance for metals to leach into the water. Aqua conducts required testing for drinking water contaminants, including lead and copper, to ensure compliance with state and federal drinking water standards. Aqua tests the water at our treatment plants, and also schedules customer tap sampling and tests for lead in potential high-risk areas, to comply with the U.S. Environmental Protection Agency's (EPA) lead and copper rule.

You can always view your community's test results. They are summarized in our annual water quality reports, which are produced for every water system we own and operate.

Lead Service Line Replacement Program:

Aqua can now assist customers with replacing the customer/property owner's portion of the service line if it is made of lead. Aqua's new program will allow us to work with customers, either during a main replacement project or by customer request, to replace the customer/property owner's portion of the service line if it is lead and dedicate the service line back to the customer/property owner at no direct cost to the customer/property owner.

Visit our website at <https://www.aquawater.com/lead> for more information.



Call us at
1-866-SLM-AQUA
(1-866-756-2782)
for more information.



You can find your community's
water quality report at
[AquaWater.com](https://www.aquawater.com).

More helpful information on the back 



If you are a residential customer:

You should know that there are parts of the service line bringing water to your home that are Aqua's property (the pipe that goes from our water main in the street to your curb) and parts of the service line that are the property owner's (the pipe that goes from your curb to your home). When we encounter lead service lines during our maintenance and construction activities, we will seek to identify the material type of both portions (Aqua's and the property owner's) of the service line. If we find lead on Aqua's side only, Aqua will replace its portion of the service line. If we find lead on the customer/property owner's side, we will work with you to replace the customer/property owner portion. Disturbing a service line that contains lead, including the replacement of your lead service line, could result in temporary elevated lead levels in your drinking water.

If you have concerns regarding your internal plumbing, we recommend that you have a licensed plumber check the pipes that are your property. This is important to know, because household plumbing can also be a source of lead in tap water. See the section below on "what you can do" for minimizing your risk if this happens.

For more information about Aqua's Lead Program please call our call center hub at 1-866-SLM-AQUA (1-866-756-2782)



If you are a school or day care center:

You should know that the EPA has established more stringent sampling procedures for schools and day care centers. Because children often drink from fountains and faucets at school without flushing the water first, and because they are at higher risk of health effects due to exposure, for their protection, sampling is done differently at schools and day care centers.

Aqua suggests that you call the EPA's safe drinking water hotline at 800.426.4791 or email them using this URL: <https://www.epa.gov/lead/forms/lead-hotline-national-lead-information-center>. Specific information regarding schools can be found on EPA's website at <https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water>. It's important for any testing you do to be conducted using EPA protocols, so that the results are meaningful.

The health effects of lead:

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems.

If you are concerned about lead exposure:

- Contact your local health department or healthcare provider to find out how you can get your child tested for lead.
- Visit the EPA at [EPA.gov/lead](https://www.epa.gov/lead) for more information on the health effects of lead or reducing lead exposure in your home.
- Call Aqua at 877.987.2782 for information about testing your water.

What you can do:

If your home's water shows elevated levels of lead, or if you are concerned about the potential of lead in your water, below are ways you can minimize your exposure.

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Don't boil water to reduce lead. Lead dissolves more easily into hot water and boiling will concentrate the lead. Boiling water won't reduce lead.
- If you buy a water filter for lead removal, make sure it's approved to reduce lead. Contact NSF International, www.NSF.org.

*This information sheet contains regulatorily required or recommended language and nothing herein is intended as, nor should be construed as, a promise of or contract for payment or reimbursement of expenses incurred for any action you take on account of this information sheet.

Customer Lead Service Line Replacement Program Information Sheet



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BACKGROUND – AQUA CUSTOMER LEAD SERVICE LINE REPLACEMENT PROGRAM

Lead is a naturally occurring metal that can cause a variety of adverse health effects. While the most common sources of lead exposure are soil, paint chips and dust, drinking water is another route of lead exposure, primarily as a result of corrosion of lead pipes and plumbing materials. The Pennsylvania General Assembly determined it is in the public interest for water utilities to assist customers in the replacement of customer-owned lead, or galvanized requiring replacement (“galvanized”), service lines throughout Pennsylvania.

The service line that provides water service to a property is made up of two parts: a Company-owned portion (which connects from the Company’s main to the curb line) and a customer-owned portion (which connects from the curb line to a customer’s structure). Customers, or property owners if the customer is not the property owner (“Customer”) are required to maintain and repair the Customer-owned portion of the service line.

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”), as Receiver for the Rhodes Water Utilities, now has been granted the authority to assist Customers in replacing the Customer-owned portion of the service line if that service line is identified as lead or galvanized. The Rhodes Water Utilities include Cooperstown Water Company, Fryburg Water Company, Plumer Water Company, Sugar creek Water Company, Venango Water Company, and West Hickory Water Company.

CUSTOMER-OWNED LEAD SERVICE LINE REPLACEMENT PROGRAM

Under the Customer Lead Service Line Replacement Program (“Replacement Program”), Aqua will identify customer-owned service lines that are lead or galvanized, enter into an agreement with the Customer to replace the Customer-owned portion of the service line and restore the Customer’s property at no direct cost to the customer, dedicate the newly installed customer portion of the service line back to the Customer, and provide a warranty on the work completed to replace the Customer-owned lead or galvanized service line.

Aqua’s Replacement Program is made up of two parts: (1) replacements in connection with a main replacement project, and (2) replacements per Customer request not associated with a main replacement project.

Cap on Replacements Per Year

Aqua can perform up to 10 customer-owned lead or galvanized service line replacements per year in each of the Rhodes Water Utilities systems.

Customer Agreement and Replacement

In order for Aqua to complete a replacement, the Customer must enter into an agreement with Aqua to replace the Customer-owned lead or galvanized service line. Aqua cannot replace the Customer portion of a lead or galvanized service line without first entering into an agreement. The agreement provides that the Customer will give access to Aqua, or Aqua's contractor, to complete the replacement. To facilitate a smooth customer service line replacement, all property and appliances near where the service line enters the building at the exterior and interior wall must be moved by the homeowner prior to the replacement appointment. Following replacement, Aqua, or Aqua's contractor, will restore the property as reasonably as practicable to its former condition prior to the replacement of the Customer-owned lead or galvanized service line.

Dedication of Newly Installed Customer Portion of Service Line and Warranty

After the new Customer-owned portion of the service line is installed, the Customer-owned portion will be dedicated to the Customer and ownership and responsibility for repair and maintenance of the Customer-owned portion of the service line will remain with the Customer as was the case prior to the replacement. A two-year warranty on the workmanship and materials of the installation and the restoration of surfaces shall be provided.

Coordination of Replacements

Aqua will strive to group customer requested replacements within its operating divisions to create efficiencies. However, Aqua may replace a Customer's lead or galvanized service line if projects cannot be grouped together in its discretion.

Filters, Sampling and Testing

Upon identification of a customer lead or galvanized service line, Aqua will provide a National Sanitation Foundation approved water filter (pitcher or tap filter) and six months of replacement filters. At approximately 3-6 months after replacement is completed, Aqua will offer water sampling materials to Customers or residents, and if Customer or resident wants to have samples taken, Aqua will collect, test, and provide the results from those samples.

Reimbursement for Customers that Have Already Replaced a Lead or Galvanized Service Line

As part of Aqua's Replacement Program, Aqua will, subject to certain requirements discussed below, provide a reimbursement to those Customers that have replaced their Customer-owned lead or galvanized service line at their own cost within one year before or after a lead service line replacement project commencement and within one mile of the project area. If a Customer or property owner refuses or fails to accept the Company replacement of the lead or galvanized customer service line, the Customer or property owner will only be eligible for reimbursement if they replace their Customer

lead or galvanized service line at the customer or property owner's expense, within one year of the lead service line project commencement.

Reimbursement will occur for those Customers that provide documentation sufficient, in Aqua's sole discretion, to verify that the Customer replaced the Customer-owned lead or galvanized service line within one year before or after the start of a planned lead service line replacement project main replacement and as long as the Customer is within one mile of the main replacement project or focused replacement area. Customers will be eligible for reimbursement up to 125% of the average cost of Aqua's lead and galvanized replacements. Average cost used to determine reimbursement amounts during a calendar year will be based on Aqua's prior calendar year average costs for lead and galvanized service line replacements. Examples of documentation required by Aqua for a Customer to be eligible for reimbursement include, but are not limited to, detailed estimates from a licensed plumber and paid invoices or statements. A verified statement may also be submitted from the licensed plumber.

Aqua shall make reasonable best efforts to assist a Customer or property owner, if the Customer is not the property owner, through the reimbursement process and, to the extent possible, make determinations in favor of the Customer or property owner where the Customer or property owner has provided reasonable evidence of a customer lead or galvanized service line replacement to Aqua. However, the documentation provided to Aqua must be sufficient in the Aqua's opinion that a customer lead or galvanized service line replacement occurred.

Partial Replacements Prohibited

Under the Pennsylvania Public Utility Commission's ("PUC") regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line. If a Customer causes a partial replacement, by replacing the Customer portion of a lead or galvanized service line without notifying Aqua, Aqua is required to terminate service until a full replacement of the lead or galvanized service line can be completed.

In addition, any Customer that refuses to allow Aqua (or its contractor) to replace the lead or galvanized service line, or refuses to employ its own licensed plumber to replace the lead or galvanized service line, will result in termination of service to the property until the entire lead or galvanized service line is replaced.

Aqua shall use Step In Rights as described in Aqua's tariff to perform a replacement if the customer or occupier of the property is not the owner, and the customer or occupier provides a medical certificate or a Protection From Abuse order (or other court order issued by a court of competent jurisdiction in this Commonwealth which provides clear evidence of domestic violence), subject to the requirements in Aqua's tariff. Aqua may use Step In Rights where the customer or occupier is not the property owner if Aqua has attempted to contact the property owner with an offer to replace the Customer lead service line and has not received a response or the property owner cannot be identified.

CONCLUSION

Aqua recognizes the importance of removing lead from water systems across Pennsylvania both on Aqua owned and Customer-owned assets. Aqua looks forward to working with Customers to achieve this goal.

EXHIBIT 03

Letter provided where the customer refuses or does not respond to requests to replace the COLSL that are not connected to a main replacement project or a Utility side service line replacement



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Date

Name
Address

Dear Customer:

In connection with Aqua's Lead Service Line Replacement ("LSLR") Program, your service line has been determined to be lead or galvanized requiring replacement and either you have refused to allow Aqua to replace the service line or Aqua has not received a response from you regarding the replacement of your service line. You are now categorized as a refusal under Aqua's Lead Service Line Replacement Program. You will continue to receive annual notification of your lead or galvanized service line until the service is replaced.

As your property is not associated with a current main replacement project or the replacement of Aqua's portion of the service line, Aqua continues to encourage you to contact Aqua to allow for the replacement of your lead or galvanized service line. Please be aware that customers/property owners that replace their lead or galvanized service lines at their own expense may be eligible for reimbursement if the replacement was within a 1-mile radius of an LSLR Project and within 1 year of the of the LSLR Project Commencement. If you replace your service line at your own expense more than 1 year after the LSLR Project Commencement, you will not be eligible for reimbursement. Please note that the reimbursement Aqua may provide may not be the full amount of the cost you incurred to replace your service line at your own expense. Please review the Lead Service Line Replacement Program Information Sheet for more information.

Please contact Aqua's Water Quality Department at 610.645.4234 to set up an appointment and receive further information for Aqua or its representatives to replace your lead or galvanized service line.

Sincerely,

A handwritten signature in blue ink that reads "Michael Fili".

Michael Fili, Vice President
Capital Planning, Design & Construction
Aqua Pennsylvania, Inc.

Attachments: Lead Fact Sheet
Aqua Lead Service Line Replacement Program Information Sheet

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An  Essential Utilities Company

Aqua Wants Our Customers to Be Informed*

Este documento contiene información importante acerca de su agua potable. Haga que alguien lo traduzca para usted, o hable con alguien que lo entienda.

Here's what you should know about lead and drinking water.

Lead is not typically found in the streams, reservoirs or wells that serve as water supplies or in the main water lines that carry water from treatment plants to homes. Yet, the chemical properties of water can cause lead and other metals to leach into drinking water. The main source of lead in drinking water is from lead service lines (the pipes that deliver water from water mains in the street and into homes) and from typical household plumbing (lead solder and brass fixtures) that contains lead. Households that have, or suspect having, lead service lines or lead in their household plumbing are strongly encouraged to replace them. The use of lead in solder was prohibited after 1986, so buildings constructed after then should not have contained lead in the solder.

How Aqua protects its customers:

Water utilities, including Aqua, treat drinking water to reduce the chance for metals to leach into the water. Aqua conducts required testing for drinking water contaminants, including lead and copper, to ensure compliance with state and federal drinking water standards. Aqua tests the water at our treatment plants, and also schedules customer tap sampling and tests for lead in potential high-risk areas, to comply with the U.S. Environmental Protection Agency's (EPA) lead and copper rule.

You can always view your community's test results. They are summarized in our annual water quality reports, which are produced for every water system we own and operate.

Lead Service Line Replacement Program:

Aqua can now assist customers with replacing the customer/property owner's portion of the service line if it is made of lead. Aqua's new program will allow us to work with customers, either during a main replacement project or by customer request, to replace the customer/property owner's portion of the service line if it is lead and dedicate the service line back to the customer/property owner at no direct cost to the customer/property owner.

Visit our website at <https://www.aquawater.com/lead> for more information.



Call us at
1-866-SLM-AQUA
(1-866-756-2782)
for more information.



You can find your community's
water quality report at
[AquaWater.com](https://www.aquawater.com).

More helpful information on the back 



If you are a residential customer:

You should know that there are parts of the service line bringing water to your home that are Aqua's property (the pipe that goes from our water main in the street to your curb) and parts of the service line that are the property owner's (the pipe that goes from your curb to your home). When we encounter lead service lines during our maintenance and construction activities, we will seek to identify the material type of both portions (Aqua's and the property owner's) of the service line. If we find lead on Aqua's side only, Aqua will replace its portion of the service line. If we find lead on the customer/property owner's side, we will work with you to replace the customer/property owner portion. Disturbing a service line that contains lead, including the replacement of your lead service line, could result in temporary elevated lead levels in your drinking water.

If you have concerns regarding your internal plumbing, we recommend that you have a licensed plumber check the pipes that are your property. This is important to know, because household plumbing can also be a source of lead in tap water. See the section below on "what you can do" for minimizing your risk if this happens.

For more information about Aqua's Lead Program please call our call center hub at 1-866-SLM-AQUA (1-866-756-2782)



If you are a school or day care center:

You should know that the EPA has established more stringent sampling procedures for schools and day care centers. Because children often drink from fountains and faucets at school without flushing the water first, and because they are at higher risk of health effects due to exposure, for their protection, sampling is done differently at schools and day care centers.

Aqua suggests that you call the EPA's safe drinking water hotline at 800.426.4791 or email them using this URL: <https://www.epa.gov/lead/forms/lead-hotline-national-lead-information-center>. Specific information regarding schools can be found on EPA's website at <https://www.epa.gov/ground-water-and-drinking-water/3ts-reducing-lead-drinking-water>. It's important for any testing you do to be conducted using EPA protocols, so that the results are meaningful.

The health effects of lead:

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney or nervous system problems.

If you are concerned about lead exposure:

- Contact your local health department or healthcare provider to find out how you can get your child tested for lead.
- Visit the EPA at [EPA.gov/lead](https://www.epa.gov/lead) for more information on the health effects of lead or reducing lead exposure in your home.
- Call Aqua at 877.987.2782 for information about testing your water.

What you can do:

If your home's water shows elevated levels of lead, or if you are concerned about the potential of lead in your water, below are ways you can minimize your exposure.

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Don't boil water to reduce lead. Lead dissolves more easily into hot water and boiling will concentrate the lead. Boiling water won't reduce lead.
- If you buy a water filter for lead removal, make sure it's approved to reduce lead. Contact NSF International, www.NSF.org.

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Customer Lead Service Line Replacement Program Information Sheet



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BACKGROUND – AQUA CUSTOMER LEAD SERVICE LINE REPLACEMENT PROGRAM

Lead is a naturally occurring metal that can cause a variety of adverse health effects. While the most common sources of lead exposure are soil, paint chips and dust, drinking water is another route of lead exposure, primarily as a result of corrosion of lead pipes and plumbing materials. The Pennsylvania General Assembly determined it is in the public interest for water utilities to assist customers in the replacement of customer-owned lead, or galvanized requiring replacement (“galvanized”), service lines throughout Pennsylvania.

The service line that provides water service to a property is made up of two parts: a Company-owned portion (which connects from the Company’s main to the curb line) and a customer-owned portion (which connects from the curb line to a customer’s structure). Customers, or property owners if the customer is not the property owner (“Customer”) are required to maintain and repair the Customer-owned portion of the service line.

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”), as Receiver for the Rhodes Water Utilities, now has been granted the authority to assist Customers in replacing the Customer-owned portion of the service line if that service line is identified as lead or galvanized. The Rhodes Water Utilities include Cooperstown Water Company, Fryburg Water Company, Plumer Water Company, Sugar creek Water Company, Venango Water Company, and West Hickory Water Company.

CUSTOMER-OWNED LEAD SERVICE LINE REPLACEMENT PROGRAM

Under the Customer Lead Service Line Replacement Program (“Replacement Program”), Aqua will identify customer-owned service lines that are lead or galvanized, enter into an agreement with the Customer to replace the Customer-owned portion of the service line and restore the Customer’s property at no direct cost to the customer, dedicate the newly installed customer portion of the service line back to the Customer, and provide a warranty on the work completed to replace the Customer-owned lead or galvanized service line.

Aqua’s Replacement Program is made up of two parts: (1) replacements in connection with a main replacement project, and (2) replacements per Customer request not associated with a main replacement project.

Cap on Replacements Per Year

Aqua can perform up to 10 customer-owned lead or galvanized service line replacements per year in each of the Rhodes Water Utilities systems.

Customer Agreement and Replacement

In order for Aqua to complete a replacement, the Customer must enter into an agreement with Aqua to replace the Customer-owned lead or galvanized service line. Aqua cannot replace the Customer portion of a lead or galvanized service line without first entering into an agreement. The agreement provides that the Customer will give access to Aqua, or Aqua's contractor, to complete the replacement. To facilitate a smooth customer service line replacement, all property and appliances near where the service line enters the building at the exterior and interior wall must be moved by the homeowner prior to the replacement appointment. Following replacement, Aqua, or Aqua's contractor, will restore the property as reasonably as practicable to its former condition prior to the replacement of the Customer-owned lead or galvanized service line.

Dedication of Newly Installed Customer Portion of Service Line and Warranty

After the new Customer-owned portion of the service line is installed, the Customer-owned portion will be dedicated to the Customer and ownership and responsibility for repair and maintenance of the Customer-owned portion of the service line will remain with the Customer as was the case prior to the replacement. A two-year warranty on the workmanship and materials of the installation and the restoration of surfaces shall be provided.

Coordination of Replacements

Aqua will strive to group customer requested replacements within its operating divisions to create efficiencies. However, Aqua may replace a Customer's lead or galvanized service line if projects cannot be grouped together in its discretion.

Filters, Sampling and Testing

Upon identification of a customer lead or galvanized service line, Aqua will provide a National Sanitation Foundation approved water filter (pitcher or tap filter) and six months of replacement filters. At approximately 3-6 months after replacement is completed, Aqua will offer water sampling materials to Customers or residents, and if Customer or resident wants to have samples taken, Aqua will collect, test, and provide the results from those samples.

Reimbursement for Customers that Have Already Replaced a Lead or Galvanized Service Line

As part of Aqua's Replacement Program, Aqua will, subject to certain requirements discussed below, provide a reimbursement to those Customers that have replaced their Customer-owned lead or galvanized service line at their own cost within one year before or after a lead service line replacement project commencement and within one mile of the project area. If a Customer or property owner refuses or fails to accept the Company replacement of the lead or galvanized customer service line, the Customer or property owner will only be eligible for reimbursement if they replace their Customer

lead or galvanized service line at the customer or property owner's expense, within one year of the lead service line project commencement.

Reimbursement will occur for those Customers that provide documentation sufficient, in Aqua's sole discretion, to verify that the Customer replaced the Customer-owned lead or galvanized service line within one year before or after the start of a planned lead service line replacement project main replacement and as long as the Customer is within one mile of the main replacement project or focused replacement area. Customers will be eligible for reimbursement up to 125% of the average cost of Aqua's lead and galvanized replacements. Average cost used to determine reimbursement amounts during a calendar year will be based on Aqua's prior calendar year average costs for lead and galvanized service line replacements. Examples of documentation required by Aqua for a Customer to be eligible for reimbursement include, but are not limited to, detailed estimates from a licensed plumber and paid invoices or statements. A verified statement may also be submitted from the licensed plumber.

Aqua shall make reasonable best efforts to assist a Customer or property owner, if the Customer is not the property owner, through the reimbursement process and, to the extent possible, make determinations in favor of the Customer or property owner where the Customer or property owner has provided reasonable evidence of a customer lead or galvanized service line replacement to Aqua. However, the documentation provided to Aqua must be sufficient in the Aqua's opinion that a customer lead or galvanized service line replacement occurred.

Partial Replacements Prohibited

Under the Pennsylvania Public Utility Commission's ("PUC") regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line. If a Customer causes a partial replacement, by replacing the Customer portion of a lead or galvanized service line without notifying Aqua, Aqua is required to terminate service until a full replacement of the lead or galvanized service line can be completed.

In addition, any Customer that refuses to allow Aqua (or its contractor) to replace the lead or galvanized service line, or refuses to employ its own licensed plumber to replace the lead or galvanized service line, will result in termination of service to the property until the entire lead or galvanized service line is replaced.

Aqua shall use Step In Rights as described in Aqua's tariff to perform a replacement if the customer or occupier of the property is not the owner, and the customer or occupier provides a medical certificate or a Protection From Abuse order (or other court order issued by a court of competent jurisdiction in this Commonwealth which provides clear evidence of domestic violence), subject to the requirements in Aqua's tariff. Aqua may use Step In Rights where the customer or occupier is not the property owner if Aqua has attempted to contact the property owner with an offer to replace the Customer lead service line and has not received a response or the property owner cannot be identified.

CONCLUSION

Aqua recognizes the importance of removing lead from water systems across Pennsylvania both on Aqua owned and Customer-owned assets. Aqua looks forward to working with Customers to achieve this goal.

EXHIBIT P

Public Education Materials – 40 C.F.R. §
141.85(a)

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IMPORTANT INFORMATION ABOUT LEAD IN YOUR DRINKING WATER*

[INSERT NAME OF WATER SYSTEM] found elevated levels of lead in drinking water in some homes/buildings. Lead can cause serious health problems, especially for pregnant women and young children. Please read this information closely to see what you can do to reduce lead in your drinking water.

Health Effects of Lead

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

Sources of Lead

Lead is a common metal found in the environment. Drinking water is one possible source of lead exposure. Brass faucets, fittings, and valves, including those advertised as “low lead” or “lead-free,” may contribute lead to drinking water. Regulations previously allowed “low lead” fixtures containing up to 8 percent lead. Current regulations only allow “lead-free” fixtures with up to 0.25 percent lead. When water is in contact with pipes, service lines, or plumbing that contains lead for several hours, the lead may enter drinking water. Homes built before 1990 are more likely to have lead pipes or lead solder.

The main sources of lead exposure are lead-based paint, lead-contaminated dust or soil, and some plumbing materials. In addition, lead can be found in certain types of pottery, pewter, brass fixtures, food, and cosmetics. Other sources include exposure in the workplace and exposure from certain hobbies (lead can be carried on clothing or shoes). Lead is found in some toys, some playground equipment, and some children’s metal jewelry.

Steps You Can Take to Reduce Your Exposure to Lead in Your Water

- **Run your tap to flush out lead.** If your water has not been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking. The amount of time to run the water will depend on the length and diameter of the service line and the amount of plumbing in your home.

- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **If you buy a water filter for lead removal, make sure it is approved to reduce lead.** The filter should be certified for lead removal by NSF. For more information, contact NSF International, www.NSF.org.
- Be sure to maintain and replace a filter device in accordance with the manufacturer's instructions to protect water quality.
- **Test your water for lead.** Call us at [NUMBER] to find out how to get your water tested for lead.
- **Get your child's blood tested.** Contact your local health department or healthcare provider to find out how you can get your child tested for lead if you are concerned about exposure.

What happened? What is being done?

[Notice Specific Information: Explain why there are elevated levels of lead in the system's drinking water (if known) and what the water system is doing to reduce the lead levels in homes/buildings in this area.]

[Aqua's lead and galvanized service line replacement program

At Aqua, we are conducting a replacement program that involves replacing lead and some galvanized service lines in our drinking water systems at no direct cost to our customers. Galvanized service lines are replaced if they could potentially be a source of lead to your tap water. We will notify you if we need to arrange your service line replacement once we know the replacement schedule for your area. Note that if you proceed with replacement of your service line using your own plumber, please contact us as soon as possible since we are required to replace the company-owned service line, if lead or galvanized, to minimize the risk of lead being released into your water. You can find out your service line material by visiting the customer service line material map at www.aquawater.com/leadmap.

For more information, call us at [NUMBER], or visit our website at www.aquawater.com/lead. For more information on reducing lead exposure around your home/building and the health effects of lead, visit EPA's website at <http://www.epa.gov/lead> or contact your health care provider.

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EXHIBIT Q

Lead and Copper Monitoring Results – 40
C.F.R. § 141.85(d)



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[DATE]

Dear Customer:

We would like to thank you for your participation in the lead tap monitoring program. Below are the results of the water samples you collected from your property at **ADDRESS** on **DATE**, following the sampling instructions provided to you.

	Immediate Sample	USEPA Action Level
Lead	ug/L	15 ug/L
Copper	mg/L	1.3 mg/L

ug/L = micrograms per liter or parts per billion
mg/L = milligrams per liter or parts per million
ND = Not detected

- Lead was **NOT DETECTED** at this sample location.
- Lead was detected **BELOW** the action level of 15 ug/L (ppb).
- Lead was detected **ABOVE** the action level of 15 ug/L (ppb).

Under the authority of the Safe Drinking Water Act, the EPA set the action level for lead in drinking water at 15 ug/L. The action level is the concentration of a contaminant which, if exceeded, triggers treatment or other requirements that Aqua must follow. This means Aqua must ensure that water from the customer's tap does not exceed this level in at least 90 percent of the homes sampled (90th percentile value). Because lead may pose serious health risks, the EPA set a Maximum Contaminant Level Goal (MCLG) of zero for lead. The MCLG is the level of a contaminant in drinking water below which there is no known or expected risk to health. MCLGs allow for a margin of safety.

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

Lead is more likely to accumulate when water is in contact with a lead source for longer periods of time. There are steps you can take to minimize exposure to lead in drinking water:¹

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **Do not boil water to remove lead.** Boiling water will not reduce lead.
- **Consider alternative sources or treatment of water.** You may want to consider purchasing bottled water or a water filter. Read the package to be sure the filter is approved to reduce lead or contact NSF International (www.nsf.org) for information on performance standards for water filters. Be sure to maintain and replace a filter device in accordance with the manufacturer's instructions to protect water quality.
- **Test your water for lead.** Call us at 610.645.4234 to find out how to get your water tested for lead.
- **Get your child's blood tested.** Contact your local health department or healthcare provider to find out how you can get your child tested for lead if you are concerned about exposure.

If you need more information concerning this result or have any questions, please contact us at 610.645.4234.

Sincerely,

Aqua Pennsylvania

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EXHIBIT R

Notification of Known Lead / GRR /
Unknown Service Line – 40 C.F.R. §
141.85(e)(3)



Customer Name

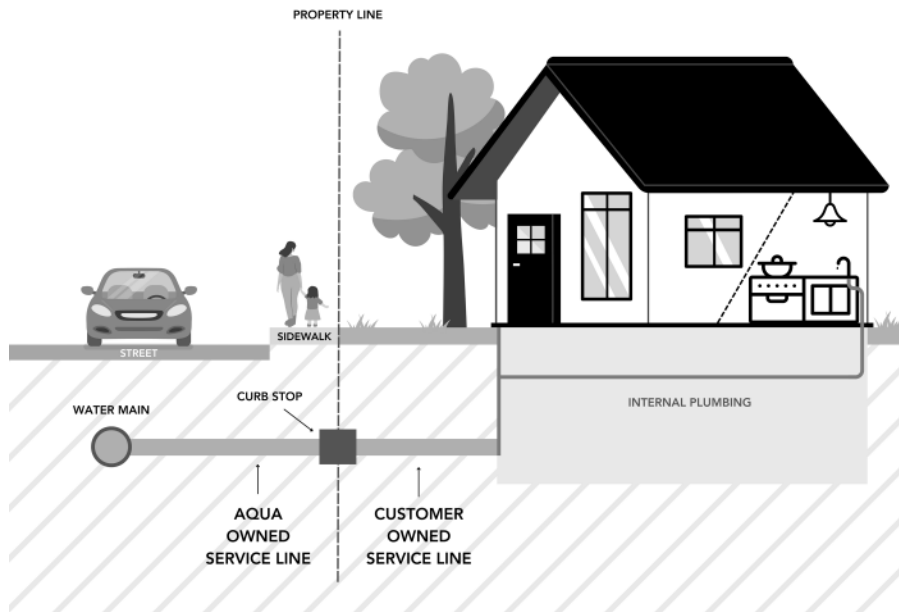
Address Line 1

Address Line 2

City, State Zip

Dear Customer:

Aqua Pennsylvania, Inc. (Aqua) is conducting a service line material inventory and replacement program to identify and replace all lead and galvanized service lines in our drinking water systems at no direct cost to our customers. Aqua supplies water to your property through a service line that runs from the water main into your building. Aqua owns the service line from the water main to the curb stop. You own the service line that runs from the curb stop into your building.



SEE BELOW FOR YOUR SERVICE LINE CLASSIFICATION

Our records show the following information for your property:

- **Premise Number:**
- **Street Address:**
- **Aqua Side Service Line Classification:**
- **Customer Side Service Line Classification:**
- **Regulatory Classification*:**

*Regulatory Classification is determined based on information available for both sides of the service line.

Currently, no action is required of you. Please understand that inventorying and replacement efforts will take many years. We are developing detailed plans to meet these objectives. We will notify you if we require more information or need to arrange your service line replacement once we know the schedule for your area. Note that if you proceed with replacement of your service line using your own plumber, please contact us as soon as possible since we are required to replace the company-owned service line, if lead or galvanized, to minimize the risk of lead being released into your water.

HEALTH EFFECTS OF LEAD

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning and behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

STEPS TO REDUCE LEAD IN YOUR DRINKING WATER

Lead is more likely to accumulate when water is in contact with a lead source for longer periods of time. There are steps you can take to minimize exposure to lead in drinking water:

- **Run your tap to flush out lead.** If your water has not been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking. The amount of time to run the water will depend on the length and diameter of the service line and the amount of plumbing in your home.
- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **If you buy a water filter for lead removal, make sure it is approved to reduce lead.** The filter should be certified for lead removal by NSF. For more information, contact NSF International, www.NSF.org.

For more information on lead and our replacement program, please visit www.aquawater.com/lead.

Please note that when we begin working in your area, we will contact you to arrange inspections and service line replacements. This will provide you with the opportunity to verify your service line material. If you have other questions, please call our dedicated service line material call center hub at 1-866-SLM-AQUA (1-866-756-2782).

Sincerely,

Aqua Pennsylvania, Inc.

EXHIBIT S

Held For Future Use

EXHIBIT T

Held For Future Use

EXHIBIT U

Notification of a Disturbance to a Lead,
GRR, or Lead Status Unknown Service Line
that Results in the Service Line Being Shut
Off or Bypassed – 40 C.F.R. § 141.85(f)(1)




ESTE DOCUMENTO CONTIENE INFORMACIÓN IMPORTANTE ACERCA DE SU AGUA POTABLE. HAGA QUE ALGUIEN LO TRADUZCA PARA USTED, O HABLE CON ALGUIEN QUE LO ENTIENDA.

An Important Health Notice From Aqua*



Aqua Pennsylvania is completing work on our water system that requires shutting off or bypassing your service line that may cause a disturbance to your service line. Our records indicate that your water service line is lead, galvanized requiring replacement, or lead status unknown. Due to the nature of your service line material, we must inform you that disturbing a service line that contains lead could result in elevated lead levels in your drinking water.

Before using your water, please review and follow the flushing instructions¹ below to minimize your exposure to lead and to remove particulate lead that may have been stirred up during the disturbance.

-  1 If possible, remove faucet aerators from all water faucets in the home.
- 2 Beginning in the lowest level of the home, fully open the cold water faucets throughout the home.
- 3 Let the water run for at least 30 minutes at the last faucet you opened (which was on your top floor).
- 4 Turn off each faucet starting with the faucets in the highest level of the home. Be sure to run water in bathtubs and showers as well as faucets.
- 5 Clean and reinstall any aerators you might have removed in Step 1.
- 6 Do not consume tap water, open hot water faucets, or use icemaker or filtered water dispenser until after flushing is complete.

¹Based on the American Water Works Association-recommended safety procedures (awwa.org).

Please visit Aqua's website for more information concerning Aqua's Replacement program at www.aquawater.com/lead. Thank you for letting Aqua serve you! For questions and concerns please contact Aqua's lead call center hub at 1-866-SLM-AQUA (1-866-756-2782).

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EXHIBIT V

Notification of a Disturbance to a Lead,
GRR, or Lead Status Unknown Service Line
From the Replacement of an Inline Water
Meter, a Water Meter Setter, or Gooseneck,
Pigtail, or Connector – 40 C.F.R. §
141.85(f)(2)



An  Essential Utilities Company


ESTE DOCUMENTO CONTIENE INFORMACIÓN IMPORTANTE ACERCA DE SU AGUA POTABLE. HAGA QUE ALGUIEN LO TRADUZCA PARA USTED, O HABLE CON ALGUIEN QUE LO ENTIENDA.

An Important Health Notice From Aqua*


PLEASE READ THIS BEFORE USING YOUR WATER!

Aqua Pennsylvania is completing work on our water system including replacing an inline water meter, a water meter setter, or gooseneck, pigtail, or connector that may cause a disturbance to your service line. Our records indicate that your water service line is lead, galvanized requiring replacement, or lead status unknown. Due to the nature of your service line material, we must inform you that disturbing a service line that contains lead could result in elevated lead levels in your drinking water.

Before using your water, please review and follow the flushing instructions¹ below to minimize your exposure to lead and to remove particulate lead that may have been stirred up during the disturbance. Please use the provided pitcher filter prior to using water for drinking and cooking. Please refer to the instructions provided with the pitcher filter.

-  **1** If possible, remove faucet aerators from all water faucets in the home.
- 2** Beginning in the lowest level of the home, fully open the cold water faucets throughout the home.
- 3** Let the water run for at least 30 minutes at the last faucet you opened (which was on your top floor).
- 4** Turn off each faucet starting with the faucets in the highest level of the home. Be sure to run water in bathtubs and showers as well as faucets.
- 5** Clean and reinstall any aerators you might have removed in Step 1.
- 6** Do not consume tap water, open hot water faucets, or use icemaker or filtered water dispenser until after flushing is complete.

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Please visit Aqua's website for more information concerning Aqua's Replacement program at www.aquawater.com/lead. Thank you for letting Aqua serve you! For questions and concerns please contact Aqua customer service at 1-866-SLM-AQUA (1-866-756-2782).

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Customer Lead Service Line Replacement Program Information Sheet



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Lead is a naturally occurring metal that can cause a variety of adverse health effects. While the most common sources of lead exposure are soil, paint chips and dust, drinking water is another route of lead exposure, primarily as a result of corrosion of lead pipes and plumbing materials. The Pennsylvania General Assembly determined it is in the public interest for water utilities to assist customers in the replacement of customer-owned lead, or galvanized requiring replacement (“galvanized”), service lines throughout Pennsylvania.

The service line that provides water service to a property is made up of two parts: a Company-owned portion (which connects from the Company’s main to the curb line) and a customer-owned portion (which connects from the curb line to a customer’s structure). Customers, or property owners if the customer is not the property owner (“Customer”) are required to maintain and repair the Customer-owned portion of the service line.

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”), as Receiver for the Rhodes Water Utilities, now has been granted the authority to assist Customers in replacing the Customer-owned portion of the service line if that service line is identified as lead or galvanized. The Rhodes Water Utilities include Cooperstown Water Company, Fryburg Water Company, Plumer Water Company, Sugar creek Water Company, Venango Water Company, and West Hickory Water Company.

CUSTOMER-OWNED LEAD SERVICE LINE REPLACEMENT PROGRAM

Under the Customer Lead Service Line Replacement Program (“Replacement Program”), Aqua will identify customer-owned service lines that are lead or galvanized, enter into an agreement with the Customer to replace the Customer-owned portion of the service line and restore the Customer’s property at no direct cost to the customer, dedicate the newly installed customer portion of the service line back to the Customer, and provide a warranty on the work completed to replace the Customer-owned lead or galvanized service line.

Aqua’s Replacement Program is made up of two parts: (1) replacements in connection with a main replacement project, and (2) replacements per Customer request not associated with a main replacement project.

Cap on Replacements Per Year

Aqua can perform up to 10 customer-owned lead or galvanized service line replacements per year in each of the Rhodes Water Utilities systems.

Customer Agreement and Replacement

In order for Aqua to complete a replacement, the Customer must enter into an agreement with Aqua to replace the Customer-owned lead or galvanized service line. Aqua cannot replace the Customer portion of a lead or galvanized service line without first entering into an agreement. The agreement provides that the Customer will give access to Aqua, or Aqua's contractor, to complete the replacement. To facilitate a smooth customer service line replacement, all property and appliances near where the service line enters the building at the exterior and interior wall must be moved by the homeowner prior to the replacement appointment. Following replacement, Aqua, or Aqua's contractor, will restore the property as reasonably as practicable to its former condition prior to the replacement of the Customer-owned lead or galvanized service line.

Dedication of Newly Installed Customer Portion of Service Line and Warranty

After the new Customer-owned portion of the service line is installed, the Customer-owned portion will be dedicated to the Customer and ownership and responsibility for repair and maintenance of the Customer-owned portion of the service line will remain with the Customer as was the case prior to the replacement. A two-year warranty on the workmanship and materials of the installation and the restoration of surfaces shall be provided.

Coordination of Replacements

Aqua will strive to group customer requested replacements within its operating divisions to create efficiencies. However, Aqua may replace a Customer's lead or galvanized service line if projects cannot be grouped together in its discretion.

Filters, Sampling and Testing

Upon identification of a customer lead or galvanized service line, Aqua will provide a National Sanitation Foundation approved water filter (pitcher or tap filter) and six months of replacement filters. At approximately 3-6 months after replacement is completed, Aqua will offer water sampling materials to Customers or residents, and if Customer or resident wants to have samples taken, Aqua will collect, test, and provide the results from those samples.

Reimbursement for Customers that Have Already Replaced a Lead or Galvanized Service Line

As part of Aqua's Replacement Program, Aqua will, subject to certain requirements discussed below, provide a reimbursement to those Customers that have replaced their Customer-owned lead or galvanized service line at their own cost within one year before or after a lead service line replacement project commencement and within one mile of the project area. If a Customer or property owner refuses or fails to accept the Company replacement of the lead or galvanized customer service line, the Customer or property owner will only be eligible for reimbursement if they replace their Customer

lead or galvanized service line at the customer or property owner's expense, within one year of the lead service line project commencement.

Reimbursement will occur for those Customers that provide documentation sufficient, in Aqua's sole discretion, to verify that the Customer replaced the Customer-owned lead or galvanized service line within one year before or after the start of a planned lead service line replacement project main replacement and as long as the Customer is within one mile of the main replacement project or focused replacement area. Customers will be eligible for reimbursement up to 125% of the average cost of Aqua's lead and galvanized replacements. Average cost used to determine reimbursement amounts during a calendar year will be based on Aqua's prior calendar year average costs for lead and galvanized service line replacements. Examples of documentation required by Aqua for a Customer to be eligible for reimbursement include, but are not limited to, detailed estimates from a licensed plumber and paid invoices or statements. A verified statement may also be submitted from the licensed plumber.

Aqua shall make reasonable best efforts to assist a Customer or property owner, if the Customer is not the property owner, through the reimbursement process and, to the extent possible, make determinations in favor of the Customer or property owner where the Customer or property owner has provided reasonable evidence of a customer lead or galvanized service line replacement to Aqua. However, the documentation provided to Aqua must be sufficient in the Aqua's opinion that a customer lead or galvanized service line replacement occurred.

Partial Replacements Prohibited

Under the Pennsylvania Public Utility Commission's ("PUC") regulations, Aqua cannot perform a partial replacement of a lead or galvanized service line. If a Customer causes a partial replacement, by replacing the Customer portion of a lead or galvanized service line without notifying Aqua, Aqua is required to terminate service until a full replacement of the lead or galvanized service line can be completed.

In addition, any Customer that refuses to allow Aqua (or its contractor) to replace the lead or galvanized service line, or refuses to employ its own licensed plumber to replace the lead or galvanized service line, will result in termination of service to the property until the entire lead or galvanized service line is replaced.

Aqua shall use Step In Rights as described in Aqua's tariff to perform a replacement if the customer or occupier of the property is not the owner, and the customer or occupier provides a medical certificate or a Protection From Abuse order (or other court order issued by a court of competent jurisdiction in this Commonwealth which provides clear evidence of domestic violence), subject to the requirements in Aqua's tariff. Aqua may use Step In Rights where the customer or occupier is not the property owner if Aqua has attempted to contact the property owner with an offer to replace the Customer lead service line and has not received a response or the property owner cannot be identified.

CONCLUSION

Aqua recognizes the importance of removing lead from water systems across Pennsylvania both on Aqua owned and Customer-owned assets. Aqua looks forward to working with Customers to achieve this goal.

EXHIBIT W

Press Release Regarding Action Level
Exceedance – 40 C.F.R. § 141.85(b)(2)(v)

Contact: [INSERT]**For release:** [DATE]

IMPORTANT INFORMATION ABOUT LEAD IN YOUR DRINKING WATER¹

BRYN MAWR, Pa. – [INSERT NAME OF WATER SYSTEM] found elevated levels of lead in drinking water in some homes/buildings. Lead can cause serious health problems, especially for pregnant women and young children. Please read this information closely to see what you can do to reduce lead in your drinking water.

Health Effects of Lead

Exposure to lead in drinking water can cause serious health effects in all age groups. Infants and children can have decreases in IQ and attention span. Lead exposure can lead to new learning and behavior problems or exacerbate existing learning behavior problems. The children of women who are exposed to lead before or during pregnancy can have increased risk of these adverse health effects. Adults can have increased risks of heart disease, high blood pressure, kidney, or nervous system problems.

Sources of Lead

Lead is a common metal found in the environment. Drinking water is one possible source of lead exposure. Lead Service lines, brass faucets, fittings, and valves, including those advertised as “low lead” or “lead-free,” may contribute lead to drinking water. Regulations previously allowed “low lead” fixtures containing up to 8 percent lead. Current regulations only allow “lead-free” fixtures with up to 0.25 percent lead. When water is in contact with pipes, service lines, or plumbing that contains lead for several hours, the lead may enter drinking water. Homes built before 1990 are more likely to have lead pipes or lead solder.

The main sources of lead exposure are lead-based paint, lead-contaminated dust or soil, and some plumbing materials. In addition, lead can be found in certain types of pottery, pewter, brass fixtures, food, and cosmetics. Other sources include exposure in the workplace and exposure from certain hobbies (lead can be carried on clothing or shoes). Lead is found in some toys, some playground equipment, and some children’s metal jewelry.

¹ This information contains regulatory or recommended language, and nothing herein is intended as, nor should be construed as, a promise of or contract for payment or reimbursement of expenses incurred for any action you take on account of this information sheet.

Steps You Can Take to Reduce Your Exposure to Lead in Your Water

- **Run your tap to flush out lead.** If your water hasn't been used for several hours, run your water for a few minutes or until it becomes cold or reaches a steady temperature before drinking or cooking.
- **Use cold water to cook or prepare baby formula.** Do not boil water to reduce lead. Lead dissolves more easily in hot water and boiling water will concentrate the lead.
- **Do not boil water to remove lead.** Boiling water will not reduce lead.
- **Consider alternative sources or treatment of water.** You may want to consider purchasing bottled water or a water filter. Read the package to be sure the filter is approved to reduce lead or contact NSF International (www.nsf.org) for information on performance standards for water filters. Be sure to maintain and replace a filter device in accordance with the manufacturer's instructions to protect water quality.
- **Test your water for lead.** Call us at 1-877-987-2782 to find out how to get your water tested for lead.
- **Get your child's blood tested.** Contact your local health department or healthcare provider to find out how you can get your child tested for lead if you are concerned about exposure.

What happened? What is being done?

[Notice Specific Information: Explain why there are elevated levels of lead in the system's drinking water (if known) and what the water system is doing to reduce the lead levels in homes/buildings in this area.]

Aqua's lead and galvanized service line replacement program

At Aqua, we are implementing a program that involves replacing all lead and galvanized service lines in our drinking water systems at no direct cost to our customers. Information about our lead and galvanized service line replacement program is attached. For more information, call us at 1-866-SLM-AQUA (1-866-756-2782), or visit our website at www.aquawater.com/lead.

"We take seriously our responsibility to sustain life by safely delivering Earth's most essential resource, and our mission is exemplified by our commitment to remove lead service lines from drinking water systems across Pennsylvania," said Aqua Pennsylvania President Marc Lucca. "Our lead service line replacement program enables our team to ensure safe drinking water for our customers without unnecessarily burdening them with the direct cost of replacement."

For more information on reducing lead exposure around your home/building and the health effects of lead, visit EPA's website at <http://www.epa.gov/lead> or contact your health care provider.

Aqua Pennsylvania serves approximately 1.5 million people in 32 counties throughout the Commonwealth of Pennsylvania. Visit AquaWater.com for more information or follow Aqua on Facebook at facebook.com/AquaWater and on Twitter at [@AquaWater](https://twitter.com/AquaWater).

This release contains forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995, including, among others: the Company's ability to replace all lead and galvanized requiring replacement service lines in its drinking water systems and to do this at no direct cost to its customers. There are important factors that could cause actual results to differ materially from those expressed or implied by such forward-looking statements including: general economic business conditions; the receipt of governmental approvals; and other factors discussed in our Annual Report on Form 10-K, our Quarterly Reports on Form 10-Q, and other filings with the Securities and Exchange Commission. For more information regarding risks and uncertainties associated with Essential Utilities' business, please refer to Essential Utilities' annual, quarterly and other SEC filings. Essential Utilities is not under any obligation — and expressly disclaims any such obligation — to update or alter its forward-looking statements whether as a result of new information, future events or otherwise.

#

EXHIBIT B

Tariff Supplements

Supplement No. 10
To
Water - Pa. P.U.C. No. 3

WEST HICKORY WATER COMPANY
RATES, RULES AND REGULATIONS GOVERNING
THE PROVISION OF WATER SERVICE
TO THE PUBLIC IN PORTION OF
HARMONY TOWNSHIP,
INCLUDING THE VILLAGE OF WEST HICKORY,
FOREST COUNTY, PENNSYLVANIA

ISSUED: XXXX-XX-XXXX

EFFECTIVE: XXXX-XX-XXXX

BY: Marc A. Lucca
President
Aqua Pennsylvania, Inc.
762 W. Lancaster Ave.
Bryn Mawr, PA 19010

AS RECEIVER FOR:
West Hickory Water Company
Randall L. Rhodes, Secretary
P.O. Box 397
Reno, PA 16343

NOTICE

THIS TARIFF SUPPLEMENT MODIFIES THE EXISTING SERVICE LINE RULES AND REGULATIONS IN COMPLIANCE WITH 52 PA. CODE § 65.51 ET SEQ.

West Hickory Water Company

Supplement No. 10
To
Water - Pa. P.U.C. No. 3
Page No. 2

LIST OF CHANGES

Supplement No. 10 to Water - Pa. P.U.C. No. 3 modifies the customer service line rules (Section 4.C.) in compliance with 52 Pa. Code § 65.51 et seq. by adding Rule 4.19.

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RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

4.19 Customer Owned Lead Service Lines

Aqua Pennsylvania, Inc. ("Aqua") as Receiver for the Utility shall perform lead service line replacement ("LSLR") activities in accordance with Venango Water Company's LSLR Plan, which applies to the Utility, approved in Docket No. P-2024-3050248.

Notwithstanding Rule 4.15, the Utility (or contractors employed by the Utility) shall replace Customer Owned Lead Service Lines ("COLSLs") pursuant to the Utility's Lead Service Line Replacement Program ("Replacement Program"), provided the customer (or the property owner if the customer is not the property owner) provides consent through a signed agreement.

Lead Service Line - LSL - shall be defined as a service line made of lead that connects the water main to a building inlet and a lead pigtail, gooseneck or other fitting that is connected to the lead line. A galvanized service line (iron or steel piping that has been dipped in zinc to prevent corrosion and rusting) is considered a Lead Service Line ("LSL") if it ever was or is currently downstream of any LSL or service line of unknown material.

Customer Owned Lead Service Line - COLSL - shall be defined as the portion of the LSL extending from the curb, property line or Utility connection to the Utility's water meter or, if the Utility's water meter is located outside of the structure or water is not metered by the Utility, at the first shutoff valve located within the interior of the structure.

The Utility will replace up to 10 COLSLs per year under the Utility's Replacement Program. If reimbursements would cause the Utility to exceed its current annual cap, the Utility shall increase its current annual cap by the amount of the reimbursement and decrease its next annual cap by this amount.

If no shutoff valve exists along the pipe within 5 feet of the Customer's structure wall, the Utility may install a shutoff valve which will serve as the point of demarcation between the property's service line and the property's interior water distribution piping.

No customer or property owner may install a partial LSL. A partial LSL shall result in termination of service until such time as the Utility can replace the Utility-owned LSL. A customer, or property owner where the customer is not the property owner, that elects to replace the COLSL themselves, shall replace the COLSL concurrent with the Utility replacing the Utility-owned LSL, provided that the customer or property owner shall provide the Utility at least 90 days' notice prior to replacing the COLSL.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

The Utility shall refuse to establish service to a property where a customer or property owner (if the customer is not the property owner) has previously refused or failed to accept the Utility's offer to replace the COLSL until the applicant verifies the replacement of the COLSL by providing a paid invoice from a licensed contractor or verified statement from a licensed contractor attesting to the completion of the COLSL replacement. The customer or property owner may also request Utility (or its contractor) complete the COLSL replacement. Upon completion, service will be established or restored to the property.

Through the Replacement Program the Utility will perfect any ownership discrepancies regarding the Utility Service Line and the Customer Service Line, so that the Customer will own the Customer Service Line and the Utility will own the Utility Service Line. This will occur by the Customer and the Utility executing the Customer Lead/Galvanized Service Line Replacement License Agreement which establishes the Customer's and Utility's respective ownership and responsibilities regarding the Customer Service Line and Utility Service Line.

Step In Rights

Step In Rights Defined. In reference to 52 Pa. Code § 65.58(c)(3), Step-In Rights means the right of the Company to avoid termination of service to a property where the resident of the Property is not the property owner, and the property owner is nonresponsive to the Company's offer to replace a COLSL.

- A. The Company can utilize Step-In Rights in the following circumstances where a Customer or occupier of a premise is not the property owner.
1. The Company has attempted to contact the property owner with an offer to replace the COLSL in accordance with the Company's LSLR Plan;
 2. The Customer or the occupier of the Property is not the property owner; and
 3. The Company has attempted to get authorization to replace the COLSL, the property owner cannot be identified, or the property owner has been notified and has not responded to the Company's offer to replace the COLSL.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

B. Circumstances Where the Company Must Use Step-In Rights.

1. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer or occupant of the Property provides a medical certification signed by a licensed physician, nurse practitioner or physician's assistant to the Company by fax, email or mail (providing the contact information).
2. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer provides a Protection From Abuse (PFA) order.
3. The Company shall use Step-In Rights to avoid the termination of water service to the Customer or the occupant of the Property except when, in the Company's reasonable judgement, replacement would place its workers or utility facilities at a safety risk and in such instance, the Company may use Step-In Rights at its discretion.

C. After the replacement is complete, the Company will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations caused by the service line replacement in the structure at the Property (Company Restoration Work). No other restoration will be conducted for the Customer side replacement. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways (Private Side Restoration Work), and all restoration costs for such Private Side Restoration Work shall be borne by the property owner.

D. When the Company exercises Step-In Rights, the Company's liability shall be limited to the amount in Section 51 of its Water Tariff for any action brought against the Company, its officers, directors, employees and agents for damages arising from any and all liability, including liability to third parties and the property owner, for personal injury, including death, property damage, or other actions, damages, fines, penalties, claims, demands, judgments, losses, costs, expenses, suit and actions (including reasonable attorney's fees), for personal injury, including death, property damage or other injury, to the extent caused by or arising out of the work performed by the Company or its agents in replacing the customer-owned LSL and/or the Company Restoration Work that the Company is responsible for under subsection C above.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Reimbursements

The Company shall provide a reimbursement to an eligible customer or property owner, if the customer is not the property owner, who replaced their LSL within 1 year before or after the commencement of a Lead Service Line Replacement ("LSLR") Project. A LSLR Project shall be defined as a Company scheduled lead service line replacement activity either in conjunction with main replacements, or a specific delineated project area to replace LSLs. LSLR Project Commencement shall be defined as installation of the first lead service line replacement within a lead service line project area. LSLR Project Area shall be defined as the area encompassing the Company's scheduled lead service line replacement activities, which includes the area within a 1-mile radius of a LSLR Project, if that area is served by the Company.

Reimbursements to customers or property owners, if the customer is not the property owner, require that the customer or property owner provides the Company with a paid invoice, a certification or verified statement from a certified plumber, and other documentation required by the Company, in its sole discretion, to verify the replacement. Failure to provide sufficient information will result in no reimbursement being paid. The Company shall reimburse eligible customers or property owners up to 125% of the average costs of Aqua's LSLRs, not to exceed the actual cost incurred by the customer to replace their LSL. The average cost of Aqua's LSLRs in any year will be determined by the average cost of Aqua LSLRs in the prior calendar year. Reimbursements will be provided to customers or property owners through check mailed to the customer or property owner within 90 days of the request; provided that all documentation is sufficient and received by the Company. Customers or property owners that are outside the LSLR Project Area or seek reimbursement for a replacement that occurred greater than one year before or after the LSLR Project Commencement will be ineligible for reimbursement.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Warranty

The Company (or its contractor) shall provide a warranty to the customer or property owner, if the customer is not the property owner, for a period of two years on the workmanship and materials of the LSLR and the restoration of surfaces. The two year warranty shall commence upon the re-establishment of water service to the property after the LSLR has occurred.

The maximum coverage under the warranty shall be only to repair or replace the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces which shall mean restoration as reasonably as practicable to the condition that existed prior to the LSLR. The maximum coverage amount for replacing or repairing the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces shall be an amount up to Twenty Thousand Dollars (\$20,000.00).

The Company will not be liable for any damages beyond the maximum coverage of the two year warranty as described in this warranty section.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

Supplement No. 12
To
Water - Pa. P.U.C. No. 3

SUGARCREEK WATER COMPANY
RATES, RULES AND REGULATIONS GOVERNING
THE PROVISION OF WATER SERVICE
TO THE PUBLIC IN PORTION OF
SUGARCREEK BOROUGH,
INCLUDING THE VILLAGE OF SUGARCREEK,
VENANGO COUNTY, PENNSYLVANIA

ISSUED: XXXX-XX-XXXX

EFFECTIVE: XXXX-XX-XXXX

BY: Marc A. Lucca
President
Aqua Pennsylvania, Inc.
762 W. Lancaster Ave.
Bryn Mawr, PA 19010

AS RECEIVER FOR:
Sugarcreek Water Company
Randall L. Rhodes, Secretary
P.O. Box 397
Reno, PA 16343

NOTICE

THIS TARIFF SUPPLEMENT MODIFIES THE EXISTING SERVICE LINE RULES AND REGULATIONS IN COMPLIANCE WITH 52 PA. CODE § 65.51 ET SEQ.

Sugarcreek Water Company

Supplement No. 12
To
Water - Pa. P.U.C. No. 3
Page No. 2

LIST OF CHANGES

Supplement No. 12 to Water - Pa. P.U.C. No. 3 modifies the customer service line rules (Section 4.C.) in compliance with 52 Pa. Code § 65.51 et seq. by adding Rule 4.19.

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RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

4.19 Customer Owned Lead Service Lines

Aqua Pennsylvania, Inc. ("Aqua") as Receiver for the Utility shall perform lead service line replacement ("LSLR") activities in accordance with Venango Water Company's LSLR Plan, which applies to the Utility, approved in Docket No. P-2024-3050248.

Notwithstanding Rule 4.15, the Utility (or contractors employed by the Utility) shall replace Customer Owned Lead Service Lines ("COLSLs") pursuant to the Utility's Lead Service Line Replacement Program ("Replacement Program"), provided the customer (or the property owner if the customer is not the property owner) provides consent through a signed agreement.

Lead Service Line - LSL - shall be defined as a service line made of lead that connects the water main to a building inlet and a lead pigtail, gooseneck or other fitting that is connected to the lead line. A galvanized service line (iron or steel piping that has been dipped in zinc to prevent corrosion and rusting) is considered a Lead Service Line ("LSL") if it ever was or is currently downstream of any LSL or service line of unknown material.

Customer Owned Lead Service Line - COLSL - shall be defined as the portion of the LSL extending from the curb, property line or Utility connection to the Utility's water meter or, if the Utility's water meter is located outside of the structure or water is not metered by the Utility, at the first shutoff valve located within the interior of the structure.

The Utility will replace up to 10 COLSLs per year under the Utility's Replacement Program. If reimbursements would cause the Utility to exceed its current annual cap, the Utility shall increase its current annual cap by the amount of the reimbursement and decrease its next annual cap by this amount.

If no shutoff valve exists along the pipe within 5 feet of the Customer's structure wall, the Utility may install a shutoff valve which will serve as the point of demarcation between the property's service line and the property's interior water distribution piping.

No customer or property owner may install a partial LSL. A partial LSL shall result in termination of service until such time as the Utility can replace the Utility-owned LSL. A customer, or property owner where the customer is not the property owner, that elects to replace the COLSL themselves, shall replace the COLSL concurrent with the Utility replacing the Utility-owned LSL, provided that the customer or property owner shall provide the Utility at least 90 days' notice prior to replacing the COLSL.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

The Utility shall refuse to establish service to a property where a customer or property owner (if the customer is not the property owner) has previously refused or failed to accept the Utility's offer to replace the COLSL until the applicant verifies the replacement of the COLSL by providing a paid invoice from a licensed contractor or verified statement from a licensed contractor attesting to the completion of the COLSL replacement. The customer or property owner may also request Utility (or its contractor) complete the COLSL replacement. Upon completion, service will be established or restored to the property.

Through the Replacement Program the Utility will perfect any ownership discrepancies regarding the Utility Service Line and the Customer Service Line, so that the Customer will own the Customer Service Line and the Utility will own the Utility Service Line. This will occur by the Customer and the Utility executing the Customer Lead/Galvanized Service Line Replacement License Agreement which establishes the Customer's and Utility's respective ownership and responsibilities regarding the Customer Service Line and Utility Service Line.

Step In Rights

Step In Rights Defined. In reference to 52 Pa. Code § 65.58(c)(3), Step-In Rights means the right of the Company to avoid termination of service to a property where the resident of the Property is not the property owner, and the property owner is nonresponsive to the Company's offer to replace a COLSL.

- A. The Company can utilize Step-In Rights in the following circumstances where a Customer or occupier of a premise is not the property owner.
1. The Company has attempted to contact the property owner with an offer to replace the COLSL in accordance with the Company's LSLR Plan;
 2. The Customer or the occupier of the Property is not the property owner; and
 3. The Company has attempted to get authorization to replace the COLSL, the property owner cannot be identified, or the property owner has been notified and has not responded to the Company's offer to replace the COLSL.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

B. Circumstances Where the Company Must Use Step-In Rights.

1. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer or occupant of the Property provides a medical certification signed by a licensed physician, nurse practitioner or physician's assistant to the Company by fax, email or mail (providing the contact information).
2. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer provides a Protection From Abuse (PFA) order.
3. The Company shall use Step-In Rights to avoid the termination of water service to the Customer or the occupant of the Property except when, in the Company's reasonable judgement, replacement would place its workers or utility facilities at a safety risk and in such instance, the Company may use Step-In Rights at its discretion.

C. After the replacement is complete, the Company will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations caused by the service line replacement in the structure at the Property (Company Restoration Work). No other restoration will be conducted for the Customer side replacement. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways (Private Side Restoration Work), and all restoration costs for such Private Side Restoration Work shall be borne by the property owner.

D. When the Company exercises Step-In Rights, the Company's liability shall be limited to the amount in Section 51 of its Water Tariff for any action brought against the Company, its officers, directors, employees and agents for damages arising from any and all liability, including liability to third parties and the property owner, for personal injury, including death, property damage, or other actions, damages, fines, penalties, claims, demands, judgments, losses, costs, expenses, suit and actions (including reasonable attorney's fees), for personal injury, including death, property damage or other injury, to the extent caused by or arising out of the work performed by the Company or its agents in replacing the customer-owned LSL and/or the Company Restoration Work that the Company is responsible for under subsection C above.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Reimbursements

The Company shall provide a reimbursement to an eligible customer or property owner, if the customer is not the property owner, who replaced their LSL within 1 year before or after the commencement of a Lead Service Line Replacement ("LSLR") Project. A LSLR Project shall be defined as a Company scheduled lead service line replacement activity either in conjunction with main replacements, or a specific delineated project area to replace LSLs. LSLR Project Commencement shall be defined as installation of the first lead service line replacement within a lead service line project area. LSLR Project Area shall be defined as the area encompassing the Company's scheduled lead service line replacement activities, which includes the area within a 1-mile radius of a LSLR Project, if that area is served by the Company.

Reimbursements to customers or property owners, if the customer is not the property owner, require that the customer or property owner provides the Company with a paid invoice, a certification or verified statement from a certified plumber, and other documentation required by the Company, in its sole discretion, to verify the replacement. Failure to provide sufficient information will result in no reimbursement being paid. The Company shall reimburse eligible customers or property owners up to 125% of the average costs of Aqua's LSLRs, not to exceed the actual cost incurred by the customer to replace their LSL. The average cost of Aqua's LSLRs in any year will be determined by the average cost of Aqua LSLRs in the prior calendar year. Reimbursements will be provided to customers or property owners through check mailed to the customer or property owner within 90 days of the request; provided that all documentation is sufficient and received by the Company. Customers or property owners that are outside the LSLR Project Area or seek reimbursement for a replacement that occurred greater than one year before or after the LSLR Project Commencement will be ineligible for reimbursement.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Warranty

The Company (or its contractor) shall provide a warranty to the customer or property owner, if the customer is not the property owner, for a period of two years on the workmanship and materials of the LSLR and the restoration of surfaces. The two year warranty shall commence upon the re-establishment of water service to the property after the LSLR has occurred.

The maximum coverage under the warranty shall be only to repair or replace the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces which shall mean restoration as reasonably as practicable to the condition that existed prior to the LSLR. The maximum coverage amount for replacing or repairing the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces shall be an amount up to Twenty Thousand Dollars (\$20,000.00).

The Company will not be liable for any damages beyond the maximum coverage of the two year warranty as described in this warranty section.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

Supplement No. 17
To
Water - Pa. P.U.C. No. 2

PLUMER WATER COMPANY
RATES, RULES AND REGULATIONS GOVERNING
THE PROVISION OF WATER SERVICE
TO THE PUBLIC IN PORTIONS OF
CORNPLANTER TOWNSHIP,
INCLUDING THE VILLAGE OF PLUMER,
VENANGO COUNTY, PENNSYLVANIA

ISSUED: XXXX-XX-XXXX

EFFECTIVE: XXXX-XX-XXXX

BY: Marc A. Lucca
President
Aqua Pennsylvania, Inc.
762 W. Lancaster Ave.
Bryn Mawr, PA 19010

AS RECEIVER FOR:
Plumer Water Company
Randall L. Rhodes, Secretary
P.O. Box 397
Reno, PA 16343

NOTICE

THIS TARIFF SUPPLEMENT MODIFIES THE EXISTING SERVICE LINE RULES AND REGULATIONS IN COMPLIANCE WITH 52 PA. CODE § 65.51 ET SEQ.

Plumer Water Company

Supplement No. 17
To
Water - Pa. P.U.C. No. 2
Page No. 2

LIST OF CHANGES

Supplement No. 17 to Water - Pa. P.U.C. No. 3 modifies the customer service line rules (Section 4.C.) in compliance with 52 Pa. Code § 65.51 et seq. by adding Rule 4.19.

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RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

4.19 Customer Owned Lead Service Lines

Aqua Pennsylvania, Inc. ("Aqua") as Receiver for the Utility shall perform lead service line replacement ("LSLR") activities in accordance with Venango Water Company's LSLR Plan, which applies to the Utility, approved in Docket No. P-2024-3050248.

Notwithstanding Rule 4.15, the Utility (or contractors employed by the Utility) shall replace Customer Owned Lead Service Lines ("COLSLs") pursuant to the Utility's Lead Service Line Replacement Program ("Replacement Program"), provided the customer (or the property owner if the customer is not the property owner) provides consent through a signed agreement.

Lead Service Line - LSL - shall be defined as a service line made of lead that connects the water main to a building inlet and a lead pigtail, gooseneck or other fitting that is connected to the lead line. A galvanized service line (iron or steel piping that has been dipped in zinc to prevent corrosion and rusting) is considered a Lead Service Line ("LSL") if it ever was or is currently downstream of any LSL or service line of unknown material.

Customer Owned Lead Service Line - COLSL - shall be defined as the portion of the LSL extending from the curb, property line or Utility connection to the Utility's water meter or, if the Utility's water meter is located outside of the structure or water is not metered by the Utility, at the first shutoff valve located within the interior of the structure.

The Utility will replace up to 10 COLSLs per year under the Utility's Replacement Program. If reimbursements would cause the Utility to exceed its current annual cap, the Utility shall increase its current annual cap by the amount of the reimbursement and decrease its next annual cap by this amount.

If no shutoff valve exists along the pipe within 5 feet of the Customer's structure wall, the Utility may install a shutoff valve which will serve as the point of demarcation between the property's service line and the property's interior water distribution piping.

No customer or property owner may install a partial LSL. A partial LSL shall result in termination of service until such time as the Utility can replace the Utility-owned LSL. A customer, or property owner where the customer is not the property owner, that elects to replace the COLSL themselves, shall replace the COLSL concurrent with the Utility replacing the Utility-owned LSL, provided that the customer or property owner shall provide the Utility at least 90 days' notice prior to replacing the COLSL.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

The Utility shall refuse to establish service to a property where a customer or property owner (if the customer is not the property owner) has previously refused or failed to accept the Utility's offer to replace the COLSL until the applicant verifies the replacement of the COLSL by providing a paid invoice from a licensed contractor or verified statement from a licensed contractor attesting to the completion of the COLSL replacement. The customer or property owner may also request Utility (or its contractor) complete the COLSL replacement. Upon completion, service will be established or restored to the property.

Through the Replacement Program the Utility will perfect any ownership discrepancies regarding the Utility Service Line and the Customer Service Line, so that the Customer will own the Customer Service Line and the Utility will own the Utility Service Line. This will occur by the Customer and the Utility executing the Customer Lead/Galvanized Service Line Replacement License Agreement which establishes the Customer's and Utility's respective ownership and responsibilities regarding the Customer Service Line and Utility Service Line.

Step In Rights

Step In Rights Defined. In reference to 52 Pa. Code § 65.58(c)(3), Step-In Rights means the right of the Company to avoid termination of service to a property where the resident of the Property is not the property owner, and the property owner is nonresponsive to the Company's offer to replace a COLSL.

- A. The Company can utilize Step-In Rights in the following circumstances where a Customer or occupier of a premise is not the property owner.
1. The Company has attempted to contact the property owner with an offer to replace the COLSL in accordance with the Company's LSLR Plan;
 2. The Customer or the occupier of the Property is not the property owner; and
 3. The Company has attempted to get authorization to replace the COLSL, the property owner cannot be identified, or the property owner has been notified and has not responded to the Company's offer to replace the COLSL.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

B. Circumstances Where the Company Must Use Step-In Rights.

1. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer or occupant of the Property provides a medical certification signed by a licensed physician, nurse practitioner or physician's assistant to the Company by fax, email or mail (providing the contact information).
2. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer provides a Protection From Abuse (PFA) order.
3. The Company shall use Step-In Rights to avoid the termination of water service to the Customer or the occupant of the Property except when, in the Company's reasonable judgement, replacement would place its workers or utility facilities at a safety risk and in such instance, the Company may use Step-In Rights at its discretion.

C. After the replacement is complete, the Company will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations caused by the service line replacement in the structure at the Property (Company Restoration Work). No other restoration will be conducted for the Customer side replacement. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways (Private Side Restoration Work), and all restoration costs for such Private Side Restoration Work shall be borne by the property owner.

D. When the Company exercises Step-In Rights, the Company's liability shall be limited to the amount in Section 51 of its Water Tariff for any action brought against the Company, its officers, directors, employees and agents for damages arising from any and all liability, including liability to third parties and the property owner, for personal injury, including death, property damage, or other actions, damages, fines, penalties, claims, demands, judgments, losses, costs, expenses, suit and actions (including reasonable attorney's fees), for personal injury, including death, property damage or other injury, to the extent caused by or arising out of the work performed by the Company or its agents in replacing the customer-owned LSL and/or the Company Restoration Work that the Company is responsible for under subsection C above.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Reimbursements

The Company shall provide a reimbursement to an eligible customer or property owner, if the customer is not the property owner, who replaced their LSL within 1 year before or after the commencement of a Lead Service Line Replacement ("LSLR") Project. A LSLR Project shall be defined as a Company scheduled lead service line replacement activity either in conjunction with main replacements, or a specific delineated project area to replace LSLs. LSLR Project Commencement shall be defined as installation of the first lead service line replacement within a lead service line project area. LSLR Project Area shall be defined as the area encompassing the Company's scheduled lead service line replacement activities, which includes the area within a 1-mile radius of a LSLR Project, if that area is served by the Company.

Reimbursements to customers or property owners, if the customer is not the property owner, require that the customer or property owner provides the Company with a paid invoice, a certification or verified statement from a certified plumber, and other documentation required by the Company, in its sole discretion, to verify the replacement. Failure to provide sufficient information will result in no reimbursement being paid. The Company shall reimburse eligible customers or property owners up to 125% of the average costs of Aqua's LSLRs, not to exceed the actual cost incurred by the customer to replace their LSL. The average cost of Aqua's LSLRs in any year will be determined by the average cost of Aqua LSLRs in the prior calendar year. Reimbursements will be provided to customers or property owners through check mailed to the customer or property owner within 90 days of the request; provided that all documentation is sufficient and received by the Company. Customers or property owners that are outside the LSLR Project Area or seek reimbursement for a replacement that occurred greater than one year before or after the LSLR Project Commencement will be ineligible for reimbursement.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Warranty

The Company (or its contractor) shall provide a warranty to the customer or property owner, if the customer is not the property owner, for a period of two years on the workmanship and materials of the LSLR and the restoration of surfaces. The two year warranty shall commence upon the re-establishment of water service to the property after the LSLR has occurred.

The maximum coverage under the warranty shall be only to repair or replace the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces which shall mean restoration as reasonably as practicable to the condition that existed prior to the LSLR. The maximum coverage amount for replacing or repairing the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces shall be an amount up to Twenty Thousand Dollars (\$20,000.00).

The Company will not be liable for any damages beyond the maximum coverage of the two year warranty as described in this warranty section.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

Supplement No. 18
To
Water - Pa. P.U.C. No. 3

FRYBURG WATER COMPANY
RATES, RULES AND REGULATIONS GOVERNING
THE PROVISION OF WATER SERVICE
TO THE PUBLIC IN PORTIONS OF
WASHINGTON TOWNSHIP,
CLARION COUNTY, PENNSYLVANIA
AND
A PORTION OF PINEGROVE TOWNSHIP,
VENANGO COUNTY, PENNSYLVANIA

ISSUED: XXXX-XX-XXXX

EFFECTIVE: XXXX-XX-XXXX

BY: Marc A. Lucca
President
Aqua Pennsylvania, Inc.
762 W. Lancaster Ave.
Bryn Mawr, PA 19010

AS RECEIVER FOR:
Fryburg Water Company
Randall L. Rhodes, Secretary
P.O. Box 397
Reno, PA 16343

NOTICE

THIS TARIFF SUPPLEMENT MODIFIES THE EXISTING SERVICE LINE RULES AND REGULATIONS IN COMPLIANCE WITH 52 PA. CODE § 65.51 ET SEQ.

Fryburg Water Company

Supplement No. 18
To
Water - Pa. P.U.C. No. 3
Page No. 2

LIST OF CHANGES

Supplement No. 18 to Water - Pa. P.U.C. No. 3 modifies the customer service line rules (Section 4.C.) in compliance with 52 Pa. Code § 65.51 et seq. by adding Rule 4.19.

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Lead Ban Compliance	38 Original
Lead Ban Compliance, cont.	39 Original

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

4.19 Customer Owned Lead Service Lines

Aqua Pennsylvania, Inc. ("Aqua") as Receiver for the Utility shall perform lead service line replacement ("LSLR") activities in accordance with Venango Water Company's LSLR Plan, which applies to the Utility, approved in Docket No. P-2024-3050248.

Notwithstanding Rule 4.15, the Utility (or contractors employed by the Utility) shall replace Customer Owned Lead Service Lines ("COLSLs") pursuant to the Utility's Lead Service Line Replacement Program ("Replacement Program"), provided the customer (or the property owner if the customer is not the property owner) provides consent through a signed agreement.

Lead Service Line - LSL - shall be defined as a service line made of lead that connects the water main to a building inlet and a lead pigtail, gooseneck or other fitting that is connected to the lead line. A galvanized service line (iron or steel piping that has been dipped in zinc to prevent corrosion and rusting) is considered a Lead Service Line ("LSL") if it ever was or is currently downstream of any LSL or service line of unknown material.

Customer Owned Lead Service Line - COLSL - shall be defined as the portion of the LSL extending from the curb, property line or Utility connection to the Utility's water meter or, if the Utility's water meter is located outside of the structure or water is not metered by the Utility, at the first shutoff valve located within the interior of the structure.

The Utility will replace up to 10 COLSLs per year under the Utility's Replacement Program. If reimbursements would cause the Utility to exceed its current annual cap, the Utility shall increase its current annual cap by the amount of the reimbursement and decrease its next annual cap by this amount.

If no shutoff valve exists along the pipe within 5 feet of the Customer's structure wall, the Utility may install a shutoff valve which will serve as the point of demarcation between the property's service line and the property's interior water distribution piping.

No customer or property owner may install a partial LSL. A partial LSL shall result in termination of service until such time as the Utility can replace the Utility-owned LSL. A customer, or property owner where the customer is not the property owner, that elects to replace the COLSL themselves, shall replace the COLSL concurrent with the Utility replacing the Utility-owned LSL, provided that the customer or property owner shall provide the Utility at least 90 days' notice prior to replacing the COLSL.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

The Utility shall refuse to establish service to a property where a customer or property owner (if the customer is not the property owner) has previously refused or failed to accept the Utility's offer to replace the COLSL until the applicant verifies the replacement of the COLSL by providing a paid invoice from a licensed contractor or verified statement from a licensed contractor attesting to the completion of the COLSL replacement. The customer or property owner may also request Utility (or its contractor) complete the COLSL replacement. Upon completion, service will be established or restored to the property.

Through the Replacement Program the Utility will perfect any ownership discrepancies regarding the Utility Service Line and the Customer Service Line, so that the Customer will own the Customer Service Line and the Utility will own the Utility Service Line. This will occur by the Customer and the Utility executing the Customer Lead/Galvanized Service Line Replacement License Agreement which establishes the Customer's and Utility's respective ownership and responsibilities regarding the Customer Service Line and Utility Service Line.

Step In Rights

Step In Rights Defined. In reference to 52 Pa. Code § 65.58(c)(3), Step-In Rights means the right of the Company to avoid termination of service to a property where the resident of the Property is not the property owner, and the property owner is nonresponsive to the Company's offer to replace a COLSL.

- A. The Company can utilize Step-In Rights in the following circumstances where a Customer or occupier of a premise is not the property owner.
1. The Company has attempted to contact the property owner with an offer to replace the COLSL in accordance with the Company's LSLR Plan;
 2. The Customer or the occupier of the Property is not the property owner; and
 3. The Company has attempted to get authorization to replace the COLSL, the property owner cannot be identified, or the property owner has been notified and has not responded to the Company's offer to replace the COLSL.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

B. Circumstances Where the Company Must Use Step-In Rights.

1. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer or occupant of the Property provides a medical certification signed by a licensed physician, nurse practitioner or physician's assistant to the Company by fax, email or mail (providing the contact information).
2. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer provides a Protection From Abuse (PFA) order.
3. The Company shall use Step-In Rights to avoid the termination of water service to the Customer or the occupant of the Property except when, in the Company's reasonable judgement, replacement would place its workers or utility facilities at a safety risk and in such instance, the Company may use Step-In Rights at its discretion.

C. After the replacement is complete, the Company will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations caused by the service line replacement in the structure at the Property (Company Restoration Work). No other restoration will be conducted for the Customer side replacement. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways (Private Side Restoration Work), and all restoration costs for such Private Side Restoration Work shall be borne by the property owner.

D. When the Company exercises Step-In Rights, the Company's liability shall be limited to the amount in Section 51 of its Water Tariff for any action brought against the Company, its officers, directors, employees and agents for damages arising from any and all liability, including liability to third parties and the property owner, for personal injury, including death, property damage, or other actions, damages, fines, penalties, claims, demands, judgments, losses, costs, expenses, suit and actions (including reasonable attorney's fees), for personal injury, including death, property damage or other injury, to the extent caused by or arising out of the work performed by the Company or its agents in replacing the customer-owned LSL and/or the Company Restoration Work that the Company is responsible for under subsection C above.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Reimbursements

The Company shall provide a reimbursement to an eligible customer or property owner, if the customer is not the property owner, who replaced their LSL within 1 year before or after the commencement of a Lead Service Line Replacement ("LSLR") Project. A LSLR Project shall be defined as a Company scheduled lead service line replacement activity either in conjunction with main replacements, or a specific delineated project area to replace LSLs. LSLR Project Commencement shall be defined as installation of the first lead service line replacement within a lead service line project area. LSLR Project Area shall be defined as the area encompassing the Company's scheduled lead service line replacement activities, which includes the area within a 1-mile radius of a LSLR Project, if that area is served by the Company.

Reimbursements to customers or property owners, if the customer is not the property owner, require that the customer or property owner provides the Company with a paid invoice, a certification or verified statement from a certified plumber, and other documentation required by the Company, in its sole discretion, to verify the replacement. Failure to provide sufficient information will result in no reimbursement being paid. The Company shall reimburse eligible customers or property owners up to 125% of the average costs of Aqua's LSLRs, not to exceed the actual cost incurred by the customer to replace their LSL. The average cost of Aqua's LSLRs in any year will be determined by the average cost of Aqua LSLRs in the prior calendar year. Reimbursements will be provided to customers or property owners through check mailed to the customer or property owner within 90 days of the request; provided that all documentation is sufficient and received by the Company. Customers or property owners that are outside the LSLR Project Area or seek reimbursement for a replacement that occurred greater than one year before or after the LSLR Project Commencement will be ineligible for reimbursement.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Warranty

The Company (or its contractor) shall provide a warranty to the customer or property owner, if the customer is not the property owner, for a period of two years on the workmanship and materials of the LSLR and the restoration of surfaces. The two year warranty shall commence upon the re-establishment of water service to the property after the LSLR has occurred.

The maximum coverage under the warranty shall be only to repair or replace the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces which shall mean restoration as reasonably as practicable to the condition that existed prior to the LSLR. The maximum coverage amount for replacing or repairing the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces shall be an amount up to Twenty Thousand Dollars (\$20,000.00).

The Company will not be liable for any damages beyond the maximum coverage of the two year warranty as described in this warranty section.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

Supplement No. 25
To
Water - Pa. P.U.C. No. 3

VENANGO WATER COMPANY
RATES, RULES AND REGULATIONS GOVERNING
THE PROVISION OF WATER SERVICE
TO THE PUBLIC IN A PORTION OF
SUGARCREEK BOROUGH,
INCLUDING THE VILLAGE OF RENO,
VENANGO COUNTY, PENNSYLVANIA

ISSUED: XXXX-XX-XXXX

EFFECTIVE: XXXX-XX-XXXX

BY: Marc A. Lucca
President
Aqua Pennsylvania, Inc.
762 W. Lancaster Ave.
Bryn Mawr, PA 19010

AS RECEIVER FOR:
Venango Water Company
Randall L. Rhodes, Secretary
P.O. Box 397
Reno, PA 16343

NOTICE

THIS TARIFF SUPPLEMENT MODIFIES THE EXISTING SERVICE LINE RULES AND REGULATIONS IN COMPLIANCE WITH 52 PA. CODE § 65.51 ET SEQ.

Venango Water Company

Supplement No. 25
To
Water - Pa. P.U.C. No. 3
Page No. 2

LIST OF CHANGES

Supplement No. 25 to Water - Pa. P.U.C. No. 3 modifies the customer service line rules (Section 4.C.) in compliance with 52 Pa. Code § 65.51 et seq. by adding Rule 4.19.

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RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

4.19 Customer Owned Lead Service Lines

Aqua Pennsylvania, Inc. ("Aqua") as Receiver for the Utility shall perform lead service line replacement ("LSLR") activities in accordance with VWC's LSLR Plan approved in Docket No. P-2024-3050248.

Notwithstanding Rule 4.15, the Utility (or contractors employed by the Utility) shall replace Customer Owned Lead Service Lines ("COLSLs") pursuant to the Utility's Lead Service Line Replacement Program ("Replacement Program"), provided the customer (or the property owner if the customer is not the property owner) provides consent through a signed agreement.

Lead Service Line - LSL - shall be defined as a service line made of lead that connects the water main to a building inlet and a lead pigtail, gooseneck or other fitting that is connected to the lead line. A galvanized service line (iron or steel piping that has been dipped in zinc to prevent corrosion and rusting) is considered a Lead Service Line ("LSL") if it ever was or is currently downstream of any LSL or service line of unknown material.

Customer Owned Lead Service Line - COLSL - shall be defined as the portion of the LSL extending from the curb, property line or Utility connection to the Utility's water meter or, if the Utility's water meter is located outside of the structure or water is not metered by the Utility, at the first shutoff valve located within the interior of the structure.

The Utility will replace up to 10 COLSLs per year under the Utility's Replacement Program. If reimbursements would cause the Utility to exceed its current annual cap, the Utility shall increase its current annual cap by the amount of the reimbursement and decrease its next annual cap by this amount.

If no shutoff valve exists along the pipe within 5 feet of the Customer's structure wall, the Utility may install a shutoff valve which will serve as the point of demarcation between the property's service line and the property's interior water distribution piping.

No customer or property owner may install a partial LSL. A partial LSL shall result in termination of service until such time as the Utility can replace the Utility-owned LSL. A customer, or property owner where the customer is not the property owner, that elects to replace the COLSL themselves, shall replace the COLSL concurrent with the Utility replacing the Utility-owned LSL, provided that the customer or property owner shall provide the Utility at least 90 days' notice prior to replacing the COLSL.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

The Utility shall refuse to establish service to a property where a customer or property owner (if the customer is not the property owner) has previously refused or failed to accept the Utility's offer to replace the COLSL until the applicant verifies the replacement of the COLSL by providing a paid invoice from a licensed contractor or verified statement from a licensed contractor attesting to the completion of the COLSL replacement. The customer or property owner may also request Utility (or its contractor) complete the COLSL replacement. Upon completion, service will be established or restored to the property.

Through the Replacement Program the Utility will perfect any ownership discrepancies regarding the Utility Service Line and the Customer Service Line, so that the Customer will own the Customer Service Line and the Utility will own the Utility Service Line. This will occur by the Customer and the Utility executing the Customer Lead/Galvanized Service Line Replacement License Agreement which establishes the Customer's and Utility's respective ownership and responsibilities regarding the Customer Service Line and Utility Service Line.

Step In Rights

Step In Rights Defined. In reference to 52 Pa. Code § 65.58(c)(3), Step-In Rights means the right of the Company to avoid termination of service to a property where the resident of the Property is not the property owner, and the property owner is nonresponsive to the Company's offer to replace a COLSL.

- A. The Company can utilize Step-In Rights in the following circumstances where a Customer or occupier of a premise is not the property owner.
1. The Company has attempted to contact the property owner with an offer to replace the COLSL in accordance with the Company's LSLR Plan;
 2. The Customer or the occupier of the Property is not the property owner; and
 3. The Company has attempted to get authorization to replace the COLSL, the property owner cannot be identified, or the property owner has been notified and has not responded to the Company's offer to replace the COLSL.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

B. Circumstances Where the Company Must Use Step-In Rights.

1. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer or occupant of the Property provides a medical certification signed by a licensed physician, nurse practitioner or physician's assistant to the Company by fax, email or mail (providing the contact information).
2. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer provides a Protection From Abuse (PFA) order.
3. The Company shall use Step-In Rights to avoid the termination of water service to the Customer or the occupant of the Property except when, in the Company's reasonable judgement, replacement would place its workers or utility facilities at a safety risk and in such instance, the Company may use Step-In Rights at its discretion.

C. After the replacement is complete, the Company will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations caused by the service line replacement in the structure at the Property (Company Restoration Work). No other restoration will be conducted for the Customer side replacement. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways (Private Side Restoration Work), and all restoration costs for such Private Side Restoration Work shall be borne by the property owner.

D. When the Company exercises Step-In Rights, the Company's liability shall be limited to the amount in Section 51 of its Water Tariff for any action brought against the Company, its officers, directors, employees and agents for damages arising from any and all liability, including liability to third parties and the property owner, for personal injury, including death, property damage, or other actions, damages, fines, penalties, claims, demands, judgments, losses, costs, expenses, suit and actions (including reasonable attorney's fees), for personal injury, including death, property damage or other injury, to the extent caused by or arising out of the work performed by the Company or its agents in replacing the customer-owned LSL and/or the Company Restoration Work that the Company is responsible for under subsection C above.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Reimbursements

The Company shall provide a reimbursement to an eligible customer or property owner, if the customer is not the property owner, who replaced their LSL within 1 year before or after the commencement of a Lead Service Line Replacement ("LSLR") Project. A LSLR Project shall be defined as a Company scheduled lead service line replacement activity either in conjunction with main replacements, or a specific delineated project area to replace LSLs. LSLR Project Commencement shall be defined as installation of the first lead service line replacement within a lead service line project area. LSLR Project Area shall be defined as the area encompassing the Company's scheduled lead service line replacement activities, which includes the area within a 1-mile radius of a LSLR Project, if that area is served by the Company.

Reimbursements to customers or property owners, if the customer is not the property owner, require that the customer or property owner provides the Company with a paid invoice, a certification or verified statement from a certified plumber, and other documentation required by the Company, in its sole discretion, to verify the replacement. Failure to provide sufficient information will result in no reimbursement being paid. The Company shall reimburse eligible customers or property owners up to 125% of the average costs of Aqua's LSLRs, not to exceed the actual cost incurred by the customer to replace their LSL. The average cost of Aqua's LSLRs in any year will be determined by the average cost of Aqua LSLRs in the prior calendar year. Reimbursements will be provided to customers or property owners through check mailed to the customer or property owner within 90 days of the request; provided that all documentation is sufficient and received by the Company. Customers or property owners that are outside the LSLR Project Area or seek reimbursement for a replacement that occurred greater than one year before or after the LSLR Project Commencement will be ineligible for reimbursement.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Warranty

The Company (or its contractor) shall provide a warranty to the customer or property owner, if the customer is not the property owner, for a period of two years on the workmanship and materials of the LSLR and the restoration of surfaces. The two year warranty shall commence upon the re-establishment of water service to the property after the LSLR has occurred.

The maximum coverage under the warranty shall be only to repair or replace the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces which shall mean restoration as reasonably as practicable to the condition that existed prior to the LSLR. The maximum coverage amount for replacing or repairing the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces shall be an amount up to Twenty Thousand Dollars (\$20,000.00).

The Company will not be liable for any damages beyond the maximum coverage of the two year warranty as described in this warranty section.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

Supplement No. 27
To
Water - Pa. P.U.C. No. 3

COOPERSTOWN WATER COMPANY
RATES, RULES AND REGULATIONS GOVERNING
THE PROVISION OF WATER SERVICE
TO THE PUBLIC IN PORTIONS OF
THE BOROUGH OF COOPERSTOWN,
AND THE TOWNSHIP OF JACKSON,
VENANGO COUNTY, PENNSYLVANIA

ISSUED: XXXX-XX-XXXX

EFFECTIVE: XXXX-XX-XXXX

BY: Marc A. Lucca
President
Aqua Pennsylvania, Inc.
762 W. Lancaster Ave.
Bryn Mawr, PA 19010

AS RECEIVER FOR:
Cooperstown Water Company
Randall L. Rhodes, Secretary
P.O. Box 397
Reno, PA 16343

NOTICE

THIS TARIFF SUPPLEMENT MODIFIES THE EXISTING SERVICE LINE RULES AND REGULATIONS IN COMPLIANCE WITH 52 PA. CODE § 65.51 ET SEQ.

Cooperstown Water Company

Supplement No. 27
To
Water - Pa. P.U.C. No. 3
Page No. 2

LIST OF CHANGES

Supplement No. 27 to Water - Pa. P.U.C. No. 3 modifies the customer service line rules (Section 4.C.) in compliance with 52 Pa. Code § 65.51 et seq. by adding Rule 4.19.

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RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

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RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

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RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

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C. After the replacement is complete, the Company will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations caused by the service line replacement in the structure at the Property (Company Restoration Work). No other restoration will be conducted for the Customer side replacement. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways (Private Side Restoration Work), and all restoration costs for such Private Side Restoration Work shall be borne by the property owner.

D. When the Company exercises Step-In Rights, the Company's liability shall be limited to the amount in Section 51 of its Water Tariff for any action brought against the Company, its officers, directors, employees and agents for damages arising from any and all liability, including liability to third parties and the property owner, for personal injury, including death, property damage, or other actions, damages, fines, penalties, claims, demands, judgments, losses, costs, expenses, suit and actions (including reasonable attorney's fees), for personal injury, including death, property damage or other injury, to the extent caused by or arising out of the work performed by the Company or its agents in replacing the customer-owned LSL and/or the Company Restoration Work that the Company is responsible for under subsection C above.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Reimbursements

The Company shall provide a reimbursement to an eligible customer or property owner, if the customer is not the property owner, who replaced their LSL within 1 year before or after the commencement of a Lead Service Line Replacement ("LSLR") Project. A LSLR Project shall be defined as a Company scheduled lead service line replacement activity either in conjunction with main replacements, or a specific delineated project area to replace LSLs. LSLR Project Commencement shall be defined as installation of the first lead service line replacement within a lead service line project area. LSLR Project Area shall be defined as the area encompassing the Company's scheduled lead service line replacement activities, which includes the area within a 1-mile radius of a LSLR Project, if that area is served by the Company.

Reimbursements to customers or property owners, if the customer is not the property owner, require that the customer or property owner provides the Company with a paid invoice, a certification or verified statement from a certified plumber, and other documentation required by the Company, in its sole discretion, to verify the replacement. Failure to provide sufficient information will result in no reimbursement being paid. The Company shall reimburse eligible customers or property owners up to 125% of the average costs of Aqua's LSLRs, not to exceed the actual cost incurred by the customer to replace their LSL. The average cost of Aqua's LSLRs in any year will be determined by the average cost of Aqua LSLRs in the prior calendar year. Reimbursements will be provided to customers or property owners through check mailed to the customer or property owner within 90 days of the request; provided that all documentation is sufficient and received by the Company. Customers or property owners that are outside the LSLR Project Area or seek reimbursement for a replacement that occurred greater than one year before or after the LSLR Project Commencement will be ineligible for reimbursement.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

C. Customer's Service Line, cont.

Warranty

The Company (or its contractor) shall provide a warranty to the customer or property owner, if the customer is not the property owner, for a period of two years on the workmanship and materials of the LSLR and the restoration of surfaces. The two year warranty shall commence upon the re-establishment of water service to the property after the LSLR has occurred.

The maximum coverage under the warranty shall be only to repair or replace the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces which shall mean restoration as reasonably as practicable to the condition that existed prior to the LSLR. The maximum coverage amount for replacing or repairing the Customer side service line if the failure was due to the workmanship or materials of the LSLR, and restoration of surfaces shall be an amount up to Twenty Thousand Dollars (\$20,000.00).

The Company will not be liable for any damages beyond the maximum coverage of the two year warranty as described in this warranty section.

If a repair is required and qualifies under the warranty, the customer or property owner consents and grants license to Aqua or its contractor to access the property and complete the repair as needed.

EXHIBIT C
53.52 and 121.3 Information

Please find the following information submitted as supporting data in accordance with 52 Pa. Code § 53.52(a):

1. The specific reasons for each change.

Aqua Pennsylvania, Inc. (“Aqua”) is filing this proposed tariff change on behalf of each of the Rhodes Water Utilities¹ as Receiver to comply with the Commission’s regulations under Act 120 of 2018 (“Act 120”) at 52 Pa. Code § 65.51 et seq.

2. The total number of customers served by the utility.

As of June 26, 2025, the Rhodes Water Utilities had the following customers:

	CWC	FWC	PWC	SWC	VWC	WHWC
Customers	133	212	69	82	247	227

3. A calculation of the number of customers, by tariff subdivision, whose bill will be affected by the change:

No immediate effect will occur to the Rhodes Water Utilities customers’ bills from the change; however, if Aqua is required to acquire the Rhodes Utilities systems at the conclusion of the Section 529 Proceeding, all Rhodes Water Utilities customers’ bills will be affected by the change.

4. The effect of the change on the utility’s customers.

Customers that have lead service lines will have the opportunity to have Aqua, or its contractors, replace their customer lead service line at no direct cost to that customer. Additionally, customers that have replaced their LSLs, may be eligible for reimbursement of those costs.

5. The direct or indirect effect of the proposed change on the utility’s revenue and expenses.

Under Act 120, the costs associated with the LSLR Program are recovered through the Rhodes Water Utilities’ base rates – each of the Rhodes Water Utilities do not have a Distribution System Improvement Charge. If Aqua is required to acquire the Rhodes Water Utilities systems, any costs of replacement will be recovered through base rates through a claim made under deferred accounting established in the Section 529 Proceeding. Tables 2.a. through 2.f. of the Rhodes Utilities’ LSLR Plan show the projected costs of LSLR activities.

¹ The Rhodes Water Utilities include: Cooperstown Water Company (“CWC”), Fryburg Water Company (“FWC”), Plumer Water Company (“PWC”), Sugarcreek Water Company (“SWC”), Venango Water Company (“VWC”), and West Hickory Water Company (“WHWC”)

6. The effect of the change on the service rendered by the utility.

Through the LSLR Program for the Rhodes Water Utilities, Aqua will be working to eliminate customer LSLs across the Rhodes Water Utilities footprint and thereby reducing customer exposure to lead. Aqua does not anticipate any other significant effect on the service rendered by Aqua on behalf of the Rhodes Water Utilities.

7. All factors considered by the utility in its determination to make the change. The list shall include a comprehensive statement about why these factors were chosen and the relative importance of each.

Aqua considered the following factors in its determination to make the proposed change in the tariff, they are as follows:

- (a) The Rhodes Water Utilities are required to comply with Act 120 and the Commission's regulations which require that each of the Rhodes Water Utilities submit a LSLR Program in accordance with the Commission's regulations within two years of the effective date of the Commission's lead regulations. Aqua, as Receiver of the Rhodes Water Utilities, is responsible to ensure compliance.
- (b) Reducing and eliminating lead service lines throughout the Rhodes Water Utilities systems.

These factors were chosen because they are regulatory requirements, and they will improve overall system integrity and the health of the Rhodes Water Utilities customers and the Commonwealth overall.

8. Studies undertaken by the utility in order to specifically address the proposed changes.

Aqua did not undertake a study to specifically address the proposed changes.

9. Customer polls taken and other documents which indicate customer acceptance and desire for the proposed change. If the poll or other documents reveal discernible public opposition, an explanation of why the change is in the public interest shall be provided.

While Aqua has not taken a formal poll with respect to the Rhodes Water Utilities' customer acceptance and desire for the proposed change, Aqua has already been replacing customer-owned lead service lines in Aqua's service area and customers that have participated were generally supportive of this program.

10. Plans the utility has for introducing or implementing the changes with respect to its ratepayers.

Aqua has included in its LSLR Program for the Rhodes Water Utilities various communications and outreach documents as required by the Commission's regulations. Please see the Rhodes Water Utilities LSLR Plan.

11. FCC, FERC, or Commission orders or rulings applicable to the filing.

Please refer to the Commission's Order entered March 14, 2022, at Docket No. L-2020-3019521 regarding the implementation of Act 120.

Please also see the Commission's Ex Parte Emergency Order dated August 11, 2023, and ratified by the Commission's Ratification Order dated August 24, 2023 at Docket No. M-2023-3042180, regarding Aqua being named as Receiver for VWC.

Please also see the Commission's Order entered October 30, 2024 at Docket Nos. M-2023-3042180, I-2023-3042312, and P-2024-3045205 regarding Aqua being named as Receiver for CWC, FWC, PWC, SWC, and WHWC.

Please find the following information regarding the requirements of 52 Pa. Code § 121.3 submitted as supporting data in accordance with 52 Pa. Code § 65.54(c):

(a) A utility seeking to implement a DSIC mechanism or to continue a previously-approved DSIC mechanism shall file an LTIP. The LTIP must include the following elements:

(1) Identification of types and age of eligible property owned and operated by the utility for which it is seeking DSIC recovery.

The property under the LSLR Plan that will be replaced are customer owned lead service lines. Aqua does not have exact ages of service lines in the Rhodes Water Utilities systems.

(2) An initial schedule for planned repair and replacement of eligible property.

Please see Tables 2.a. through 2.f. of the LSLR Plan.

(3) A general description of location of eligible property.

All property to be replaced is in the following areas:

	CWC	FWC	PWC	SWC	VWC	WHWC
Service Area	Cooperstown Borough and Jackson Township, Venango County	Washington Township, Clarion County; and Pinegrove Township Venango County	Cornplanter Township, Venango County	Sugarcreek Borough, Venango County	Sugarcreek Borough, Venango County	Harmony Township, Forest County

(4) A reasonable estimate of quantity of eligible property to be improved or repaired.

Aqua is developing the service line inventory as Receiver, but has requested a cap of up to 10 replacements per year in each of the Rhodes Water Utilities’ systems to allow for LSLs to be replaced as they are discovered.

(5) Projected annual expenditures and means to finance the expenditures.

Please see Tables 2.a. through 2.f. of the LSLR Plan. Aqua will use cash on hand, and short term debt to finance any replacements that occur in the Rhodes Water Utilities systems.

- (6) A description of the manner in which infrastructure replacement will be accelerated and how repair, improvement or replacement will ensure and maintain adequate, efficient, safe, reliable and reasonable service to customers.**

Aqua will replace customer LSLs as they are discovered while Receiver of the Rhodes Water Utilities' systems. Replacement of customer LSLs will reduce customer exposure to lead which will help ensure adequate, efficient, safe, reliable and reasonable service to customers.

- (7) A workforce management and training program designed to ensure that the utility will have access to a qualified workforce to perform work in a cost-effective, safe and reliable manner.**

Please see the information regarding Aqua's workforce management and training included in Aqua's LTIP on file with the Commission, which demonstrates that Aqua has access to a qualified workforce to undertake LSLR in the Rhodes Water Utilities' systems.

- (8) A description of a utility's outreach and coordination activities with other utilities, Department of Transportation and local governments regarding the planned maintenance/construction projects and roadways that may be impacted by the LTIP.**

Please see the information included in Aqua's LTIP on file with the Commission. Aqua will implement these outreach and coordination activities with respect to LSLRs in the Rhodes Water Utilities' systems.

- (b) The LTIP must address only the specific property eligible for DSIC recovery.**

The specific property to be replaced are customer owned lead service lines.

APPENDIX A

STATEMENT IN SUPPORT

Aqua Pennsylvania, Inc.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Aqua Pennsylvania, Inc. as the :
Receiver for Venango Water Company :
For Approval of the Lead Service Line : Docket No. P-2024-3050248
Replacement Program for Venango Water :
Company :

**AQUA PENNSYLVANIA, INC.’S
STATEMENT IN SUPPORT OF THE SETTLEMENT**

TO DEPUTY CHIEF ADMINISTRATIVE LAW JUDGE MARK A. HOYER:

I. INTRODUCTION

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”), serving as Receiver of Venango Water Company (“VWC”),¹ hereby submits this Statement in Support of the Joint Petition for Settlement (“Settlement”) entered into by Aqua, the Office of Consumer Advocate (“OCA”), and the Office of Small Business Advocate (“OSBA”) (collectively, “Joint Petitioners”). The Settlement, if approved, resolves all issues in the above-captioned proceeding, which concerns the Lead Service Line Replacement (“LSLR”) Plan of VWC, as applied to all the Rhodes Water Utilities.²

¹ Aqua was established as Receiver of the VWC system by the Commission’s Ex Parte Emergency Order dated August 11, 2023, and ratified by the Commission’s Ratification Order dated August 24, 2023 at Docket No. M-2023-3042180. Aqua’s Receivership under Section 529 was consolidated in *Venango Water Company – Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. as Receiver; Section 529 Investigation of Venango Water Company; Section 529 Investigation of Sugar creek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, Cooperstown Water Company and Blaine E. Rhodes Sewer Company*, Docket Nos. M-2023-3042180, I-2023-3042312, and P-2024-3045205, Deputy Chief Administrative Law Judge Mark A. Hoyer First Interim Order (Mar. 20, 2024) (“Section 529 Proceeding”).

² The water utilities of the Rhodes Utilities include Cooperstown Water Company (“CWC”), Fryburg Water Company (“FWC”), Plumer Water Company (“PWC”), Sugar creek Water Company (“SWC”), Venango Water Company (“VWC”), West Hickory Water Company (“WHWC”) (collectively, the “Rhodes Water Utilities”). By the Commission’s October 30, 2024 Opinion and Order at Docket No. M-2023-3042180, I-2023-3042312, and P-2024-3045205, which adopted Deputy Chief Administrative Law Judge Mark A. Hoyer’s October 17, 2024 Order Granting Petition for Issuance of an Interim Emergency Order on an Expedited Basis and Certifying Material Question to the Commission, stated “[t]hat the Lead Service Line Replacement (LSLR) Plan filed by Aqua Pennsylvania, Inc., as Receiver for the Venango Water Company currently pending at Docket No. P-2024-3050248, shall apply to

The Settlement reflects a carefully balanced compromise of the interests of the Joint Petitioners. As discussed in the Settlement, the Joint Petitioners have worked cooperatively to develop settlement terms that enhance the customer protections proposed in the Rhodes Water Utilities' LSLR Plan as originally filed and increase the transparency of the Rhodes Water Utilities' LSLR progress throughout the LSLR Plan period. The Settlement, if approved, will provide substantial public benefits through the implementation of the Rhodes Water Utilities' LSLR Plan, as modified by the terms of the Settlement, which details the Rhodes Water Utilities' LSLR efforts and contains all the requirements for LSLR plans set forth in the Public Utility Code and the Pennsylvania Public Utility Commission's ("Commission") regulations. Further, the Rhodes Water Utilities' LSLR Plan and the terms of the Settlement reached are consistent with Aqua's own Commission-approved LSLR Plan,³ which will allow the Company to seamlessly incorporate the Rhodes Water Utilities' systems into its ongoing lead service line replacement efforts. For these reasons and the reasons set forth below, the Settlement is fair, just and reasonable. Therefore, Deputy Chief Administrative Law Judge Mark A. Hoyer (the "ALJ") and the Commission should approve the Settlement without modification.

II. COMMISSION POLICY FAVORS SETTLEMENT

Commission policy promotes settlements. *See* 52 Pa. Code § 5.231(a). Settlements lessen the time and expense the parties must expend litigating a case and, at the same time, conserve administrative resources. The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully litigated proceeding. *See* 52 Pa. Code §

Sugarcreek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, and Cooperstown Water Company and the requirements of 52 Pa. Code § 65.55(a) shall be waived so that Aqua Pennsylvania, Inc. shall not be separately required to file LSLR Plans for Sugarcreek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, and Cooperstown Water Company." Ordering Paragraph 18.

³ *See Petition of Aqua Pennsylvania, Inc. For Approval of its Lead Service Line Replacement Program*, Docket No. P-2023-3044459 (Order entered April 10, 2025).

69.401. The Commission has explained that parties to settled cases are afforded flexibility in reaching amicable resolutions, so long as the settlement is in the public interest. *Pa. PUC v. MXenergy Electric Inc.*, Docket No. M-2012-2201861, 2013 Pa. PUC LEXIS 789, 310 P.U.R.4th 58 (Opinion and Order entered Dec. 5, 2013). In order to accept a settlement, the Commission must first determine that the proposed terms and conditions are in the public interest. *Pa. PUC v. Windstream Pennsylvania, LLC*, Docket No. M-2012-2227108, 2012 Pa. PUC LEXIS 1535 (Opinion and Order entered Sept. 27, 2012); *Pa. PUC v. C.S. Water and Sewer Assoc.*, Docket No. R-881147, 74 Pa. PUC 767 (Opinion entered Jul. 22, 1991). As explained in the next section of this Statement in Support, Aqua believes that the Settlement is just, reasonable, in the public interest, and should be approved without modification.

III. THE SETTLEMENT IS IN THE PUBLIC INTEREST

A. SUMMARY

The Settlement reflects a carefully balanced compromise of the competing interests of the Joint Petitioners. The Joint Petitioners unanimously agree that the Settlement is in the public interest, which in and of itself provides strong evidence that the Settlement is reasonable and in the public interest. Aqua responded to informal discovery requests from the active parties to this proceeding related to the proposed LSLR Plan. Further, the Joint Petitioners participated in settlement discussions and negotiations that ultimately led to the Settlement, which is based on and consistent with the terms of the settlement reached for Aqua's own LSLR Plan and which will allow Aqua to seamlessly incorporate the Rhodes Water Utilities' systems into its own LSLR Plan should the Company ultimately acquire the systems.

For these reasons and as more fully explained below, the Commission should approve the Settlement without modification because the Settlement's terms and conditions are just and reasonable and in the public interest.

B. GENERAL – THE LSLR PROGRAM, AS MODIFIED BY THE TERMS AND CONDITIONS OF THE SETTLEMENT, IS IN THE PUBLIC INTEREST

The Settlement initially provides that, subject to the terms and conditions of the Settlement, the proposals set forth in the Rhodes Water Utilities’ LSLR Plan, as submitted by Aqua as Receiver for VWC, and as applied to all the Rhodes Water Utilities,⁴ are acceptable and should be adopted by the Commission. (Settlement ¶ 11.)

The requirements for a LSLR Plan are contained in Section 1311(b) of the Pennsylvania Public Utility Code (“Public Utility Code” or the “Code”), 66 Pa. C.S. § 1311(b), Chapter 65 of the Commission’s regulations, 52 Pa. Code §§ 65.51, et seq., and the Commission’s Final Rulemaking Order regarding Act 120 of 2018 (“Act 120”) entered on March 14, 2022 at Docket No. L-2020-301952 (“Rulemaking Order”). Aqua submits that the proposed LSLR Plan, as modified by the terms and conditions of the Settlement, is in the public interest because it includes and/or addresses all of the elements prescribed by Section 1311(b) of the Public Utility Code, the applicable Commission regulations, and the Commission’s Rulemaking Order.

Pursuant to Section 65.55(b) of the Commission’s regulations, an LSLR program must include: (1) an LSLR plan as described in § 65.56 (relating to LSLR plan requirements); (2) a pro forma tariff or tariff supplement containing the proposed changes necessary to implement the entity’s LSLR program as described in § 65.58 (relating to pro forma tariff or tariff supplement requirements); and (3) information required by the Commission for filings under 66 Pa. C.S. § 1308 (relating to voluntary changes in rates), including statements required by § 53.52(a) (relating to applicability; public utilities other than canal, turnpike, tunnel, bridge and wharf companies).⁵

⁴ See note 2, *supra*.

⁵ The Rhodes Water Utilities do not have Commission-approved Long-Term Infrastructure Improvement Plans (“LTIIIP”) and, therefore, are not subject to the provisions in the Commission’s regulations requiring entities to submit a modified LTIIIP with a LSLR program petition. See 52 Pa. Code § 65.53(c).

1. The LSLR Plan’s Lead Service Line Inventory Meets the Requirements of 52 Pa. Code § 65.56(a)

Under Section 65.56(a) of the Commission’s regulations, an entity’s LSLR plan must contain a service line inventory that complies with the U.S. Environmental Protection Agency’s (“U.S. EPA”) regulations at 40 CFR 141.1-143.20 as enforced by the Department of Environmental Protection (“DEP”). *See* 52 Pa. Code § 65.56(a). Consistent with these requirements, Aqua, on behalf of the Rhodes Water Utilities, has and is continuing to develop its Service Line Inventory, as detailed in the LSLR Plan (Settlement Exhibit A), using all available sources of information to establish service line material designations for both Rhodes Water Utilities and customer owned service lines. A breakdown of the Service Line Inventory Summaries is provided in Tables 1.a. through 1.f of the LSLR Plan. (*See* Settlement Exhibit A, p. 6-7.) Through the Rhodes Water Utilities’ LSLR Plan, Aqua has committed to updating the Rhodes Water Utilities’ Service Line Inventory as progress is made on completing the inventory and if any new water systems are acquired by VWC. (*See* Settlement Exhibit A, p. 6.)

2. The LSLR Plan Details the Planning and Replacement Procedures as Required by 52 Pa. Code § 65.56(b)

Section 65.56(b) of the Commission’s regulations requires that an entity’s LSLR plan must contain a section addressing LSLR planning and replacements, and details the specific planning and replacement requirements that must be included within LSLR plans. *See* 52 Pa. Code § 65.56(b). Pursuant to these requirements, the Rhodes Water Utilities LSLR Plan contains projected annual investment and sources of financing for the LSLR Plan, as well as the projected LSLRs per calendar year and a description of how the projection was developed. *See* 52 Pa. Code § 65.56(b)(1)-(2). Aqua, as Receiver, proposed a cap of up to 10 replacements annually in each of the Rhodes Water Utilities systems between 2024 and 2028. (*See* Settlement Exhibit A, p. 8, Tables 2.a. through 2.f.) While Aqua will replace lead service lines if found during an emergency

repair, Aqua does not anticipate significant LSLR activities in the Rhodes Water Utilities' service territories. (See Settlement Exhibit A, p. 7.) Anticipated sources of financing for the replacements include cash on hand and short term debt of Aqua that will be booked under deferred accounting and recovered after the final determination of ownership in the Section 529 Proceeding, in accordance with the terms of the Receivership. (See Settlement Exhibit A, p. 7.) Aqua is currently reviewing and verifying tap card information for the Rhodes Water Utilities. The Rhodes Water Utilities' current Service Line Inventory, as laid out in Tables 1.a. through 1.f., is reproduced below:

Table 1.a. – CWC

Material Type	CWC	Customer
Lead	0	0
GRR	0	0
Non-lead	11	18
Lead status unknown	122	115
Total	133	133

Table 1.b. – FWC

Material Type	FWC	Customer
Lead	0	0
GRR	0	1
Non-lead	16	31
Lead status unknown	196	180
Total	212	212

Table 1.c. – PWC

Material Type	PWC	Customer
Lead	0	0
GRR	0	1
Non-lead	7	9
Lead status unknown	62	59
Total	69	69

Table 1.d. – SWC

Material Type	SWC	Customer
Lead	0	0
GRR	0	0
Non-lead	7	13
Lead status unknown	75	69
Total	82	82

Table 1.e. - VWC

Material Type	VWC	Customer
Lead	0	0
GRR	1	7
Non-lead	65	86
Lead status unknown	181	154
Total	247	247

Table 1.f. – WHWC

Material Type	WHWC	Customer
Lead	0	0
GRR	0	0
Non-lead	5	10
Lead status unknown	222	217
Total	227	227

The projections for 2024-2028 are consistent with Aqua’s proposed annual cap for the VWC system in the LSLR Plan. (See Settlement Exhibit A, p. 8.)

The LSLR Plan also details the prioritization criteria for LSLRs. See 52 Pa. Code § 65.56(b)(3). Specifically, Aqua considered the following prioritization criteria when developing the LSLR Plan: (1) emergency repairs revealing LSLs; (2) homes with elevated lead concentrations in tap samples; (3) schools and licensed day care facilities; and (4) homeowners that request replacements. (See Settlement Exhibit A, p. 8-9.)

The Rhodes Water Utilities’ LSLR Plan contains processes and procedures to address emergency repairs and replacements which reveal LSLs, for both customer-owned and VWC-owned LSLs. See 52 Pa. Code § 56.65(b)(4). When Aqua uncovers a customer-owned LSL

("COLSL") while completing emergency repairs to the Rhodes Water Utilities systems, Aqua will contact the customer/owner and provide them with the information and materials in Section II.B.6 of the LSLR Plan and prioritize the replacement of the entire service line, both Rhodes Water Utilities and customer side. (See Settlement Exhibit A, p. 9.) When Aqua uncovers a Rhodes Water Utilities-owned LSL while completing emergency repairs to its system, Aqua will replace the Rhodes Water Utilities service line up to the curb stop but will not make the connection, and this excavation will reveal the customer-side material. Upon verification that the customer's service line is not lead, Aqua will complete the Rhodes Water Utilities-side replacement and restore service to the property. Aqua will provide the customer with information regarding lead, pitcher filters, and flushing instructions. If the customer's service line material is lead or galvanized service line requiring replacement ("GRR"), Aqua will neither make the connection nor restore service, and Aqua will provide the resident with the information and materials in Section II.B.6. and immediately coordinate and prioritize replacement of the customer LSL. (See Settlement Exhibit A, p. 9.)

Further, the Rhodes Water Utilities' LSLR Plan details the processes and procedures to obtain acceptance of a LSLR prior to project commencement when the customer is and is not the property owner. See 52 Pa. Code § 65.56(b)(5). If main replacements are required, Aqua or its third-party representatives will send letters to customers to request authorization to gain access to a structure to review the material type of the customer's service line. Aqua personnel or Aqua's third-party vendor will visit each customer premise with an unknown service line material in a main replacement project to identify material type of the customer service line. Aqua will also be developing additional survey materials to engage customers/residents to assist Aqua in completing the VWC Service Line Inventory. (See Settlement Exhibit A, p. 10.) If Aqua uncovers a Rhodes

Water Utilities LSL or a customer LSL during maintenance or construction activities, Aqua will provide a form to the resident if the resident is at the premise or will post the form if the resident is not at the premise and attempt to contact the resident via phone to follow up with further information. (*See id.*, p. 10.) If there is no response to the investigation letter or form, Aqua will follow the provisions of Section II.B.5 of the LSLR Plan detailing further contact attempts to be made and, if necessary, shut-off procedures. (*See id.*) After making contact with the resident and identifying the presence of a customer LSL, Aqua personnel will ask whether the resident is the owner or renter of the building. (*See id.*) If the customer is the owner, and they agree to participate in the replacement, then Aqua will provide the information and materials in Section II.B.6 of the LSLR Plan. If the resident/customer is the owner and refuses to participate in the replacement, Aqua will follow the provisions of Section II.B.10 of the LSLR Plan. (*See id.*) If the resident is not the property owner, Aqua will obtain the owner's contact information from the customer and call the owner to explain the program to the owner and provide the owner with a copy of the Customer Lead/Galvanized Service Line Replacement Agreement ("Replacement Agreement"). If Aqua does not receive a response to telephone calls to the owner, Aqua will send a letter to the property owner explaining the program and request that the property owner contact Aqua. If the property owner does not respond, Aqua will explore all options to encourage property owners to participate, such as contacting the municipality and the local code enforcement in which the property is located, and, in certain circumstances, at Aqua's discretion, using Step In Rights as described in Section II.B.10 of the LSLR Plan. (*See id.*) If Aqua has not received acceptance after multiple efforts to contact the property owner and obtain the Replacement Agreement, Aqua will initiate the 10-day shut-off process. (*See id.*)

The LSLR Plan contains the processes and procedures it will follow based on the acceptance of a LSLR. *See* 52 Pa. Code § 65.56(b)(5). Initially, Aqua will provide pertinent information to the customer including: (1) the Customer Lead/Galvanized Service Line Replacement Agreement and postage-prepaid and pre-addressed envelope to Aqua; (2) the Lead Fact Sheet providing educational information about lead in drinking water; (3) the Information Sheet explaining the Lead Service Line Replacement Program; (4) post-COLSL replacement flushing instructions; and (5) a pitcher filter with six months of replacement cartridges. (*See* Settlement Exhibit A, p. 10-11.) The Replacement Agreement allows a third-party licensed professional to enter the property and complete the LSLR, confirms the ownership of the service line following installation, provides a warranty on the work completed, and requires that the contractor install the replacement service line and restore the property as reasonably as practicable to the condition that existed prior to the LSLR. (*See id.*, p. 11.) Following replacement, Aqua personnel will visit the customer's property within 5 business days after the COLSL replacement to reinstall or exchange the meter. In closing out the project, Aqua provides a letter to the customer 3-6 months post-replacement confirming that the newly installed customer service line has been transferred back to the customer/property owner, confirming the warranty for the completed work, and offering post-replacement 5th liter lead sampling and testing. (*See id.*)

Consistent with the Commission's regulations, the LSLR Plan details lead and material recycling and disposal efforts. *See* 52 Pa. Code § 65.56(b)(7). When a customer LSLR occurs, Aqua's vendors will make an attempt to pull the entire length of the line which reduces excavation and restoration costs. However, often the line cannot be pulled through and is abandoned in place. Aqua's third party vendors who complete the replacements will dispose of any lead material removed at recycling centers. No proceeds will be provided to Aqua of the recycled material

removed by the vendors. (*See* Settlement Exhibit A, p. 12.) For Rhodes Water Utilities side LSL replacements, Aqua will attempt to pull the entire length of the line, which reduces excavation and restoration costs. However, often the line cannot be pulled through and is abandoned in place. Any lead material removed during a Rhodes Water Utilities side LSL replacement will be brought back to Aqua's division office and put in Aqua's recycling containers to be taken to the recycling center. The scrap metal that is recycled will be charged to a deferred regulatory asset. (*See id.*)

The LSLR Plan also contains its commitment to adhere to industry accepted practices in the replacement of service lines. *See* 52 Pa. Code § 65.56(b)(8). Aqua will adhere to the provisions of the Rhodes Water Utilities tariffs regarding replacement of Rhodes Water Utilities service lines. In addition, Aqua will require Aqua personnel and its contractors to comply with any applicable plumbing codes related to customer-side service line replacement. Aqua will follow Commission regulations regarding LSLRs, including prevention of partial service line replacements and termination of service provisions, as needed, to prevent partial LSL replacements. (*See* Settlement Exhibit A, p. 12.)

The LSLR Plan details how its acquisition of water systems will be integrated into the Rhodes Water Utilities LSL replacement efforts. *See* 52 Pa. Code § 65.56(b)(9). Aqua does not foresee the Rhodes Water Utilities acquiring any additional water systems while it is operating the Rhodes Water Utilities systems under the Receivership. If the Rhodes Water Utilities acquire a water system prior to the deadline for water systems to complete their Service Line Inventories, Aqua will take over the water system's efforts, if any, to identify and incorporate the service line materials of the system into the Rhodes Water Utilities' overall Service Line Inventory. This will include the efforts described in Section II.A of the LSLR Plan. In the event that any water systems are acquired by the Rhodes Water Utilities after the deadline to complete Service Line Inventories,

Aqua will incorporate the acquired system's completed inventory into the Rhodes Water Utilities' Service Line Inventory. (*See* Settlement Exhibit A, p. 12.)

The LSLR Plan explains the procedure regarding refusal of the offer to replace a COLSL. *See* 52 Pa. Code § 65.56(b)(10). During a LSLR project, if the resident/property owner refuses to replace a LSL, and Aqua has either made contact with the resident/property owner and they refuse, or where the resident/property owner is non-responsive to the requests to replace the customer LSL, Aqua will initiate termination procedures. (*See* Settlement Exhibit A, pp. 12-13.) Termination procedures include posting of 10-day shut off notices and other required contacts under the Commission's regulations. When Aqua provides the 10-day shut off notice to the customer (either through delivery or posting at the customer's premises), Aqua will also provide the Customer Refusal Letter, the Lead Fact Sheet describing the health hazards of lead service lines, and the Lead Service Line Program Information Sheet, which explains the requirements for reimbursement and the potential for termination of service. (*See id.*, p. 13.) In certain circumstances, Aqua may use Step-In Rights as described in the Rhodes Water Utilities' tariffs to perform a replacement where it is in the public interest and would avoid termination of service to a customer that is not the property owner. (*See id.*, p. 13.)

3. The LSLR Plan Includes Communications, Outreach, and Education That Comply With the U.S. EPA's Regulations at 40 CFR 141.85

Pursuant to Section 65.56(c) of the Commission's regulations, the Rhodes Water Utilities' LSLR Plan contains a section addressing communications, outreach, and education that complies with the U.S. EPA's regulations at 40 CFR 141.85 (relating to public education and supplemental monitoring and mitigation requirements). 52 Pa. Code § 65.56(c). A full list of all printed and broadcast materials Aqua plans on distributing to further LSL replacement efforts is included in the LSLR Plan, and copies of the materials are attached as Exhibits to the LSLR Plan. These

materials may change, be updated from time to time, or new materials added as the LSLR Program evolves. (See Settlement Exhibit A, pp. 13-15.) The LSLR Plan also includes information regarding the portion of Aqua’s website housing information related to its LSLR Plan. Instead of developing a website specific to the Rhodes Water Utilities systems, Aqua will incorporate information on the Rhodes Water Utilities’ LSLR Program on Aqua’s website. (See *id.*, p. 15.) Aqua has developed a section of its website that houses information related to lead and its LSLR Program,⁶ which provides information on sources of lead, the health effects of lead, Aqua’s compliance with lead requirements, flushing instructions post-replacement, a video showing how to take a sample with the sample bottles provided by Aqua, and how residents can protect against lead exposure. (See *id.*) Aqua has developed an online tool to show service line material which is available on Aqua’s publicly facing website.⁷ Aqua is also developing an online tool to show the replacement schedule by geographical location, six months into the future, and allow customers/owners to determine if they are within the required radius of a project and within the required time of the commencement of a project, thereby allowing customers to determine their eligibility for reimbursement for replacements. Aqua plans to incorporate information related to the Rhodes Water Utilities within this online tool. (See *id.*)

4. The Rhodes Water Utilities Pro Forma Tariff Supplements Conform to the Requirements of 52 Pa. Code § 65.58

The Rhodes Water Utilities’ pro forma tariff supplements containing the proposed changes necessary to implement the LSLR Program includes the elements required by Section 65.58 of the Commission’s regulations, 52 Pa. C.S. § 65.58, and is attached to the Settlement as Exhibit B. The Rhodes Water Utilities pro forma tariff supplements state that the Rhodes Water Utilities will

⁶ Available at <https://www.aquawater.com/lead>.

⁷ Available at <https://www.aquawater.com/leadmap>.

replace up to 10 COLSLs per year in each of the Rhodes Water Utilities systems under the LSLR Program. (*See* Settlement Exhibit B, Page 14.a. of each Rhodes Water Utilities Tariff) The Rhodes Water Utilities' pro forma tariff supplements also specify that the Customer's service line extends from the curb, property line or utility connection to the utility's water meter or, if the utility's water meter is located outside of the structure or water is not metered by the utility, at the first shutoff valve located within the interior of the structure. (*See id.*) The pro forma tariff supplement states that no customer or property owner may install a partial LSL and that a partial LSL will result in termination of service until such time as the utility can replace the utility-owned LSL. (*See id.*) In addition, the supplements require that a customer, or property owner where the customer is not the property owner, who elects to replace the COLSL themselves, must replace the COLSL concurrent with the utility replacing the utility-owned LSL, provided that the customer or property owner shall provide at least 90 days' notice prior to replacing the COLSL. (*See id.*) The Rhodes Water Utilities' pro forma tariff supplements provide for the reimbursement of eligible customers or property owners, if the customer is not the property owner, who replaced their LSL within 1 year before or after the commencement of a LSLR Project. (*See id.*, Page 14.d. of each Rhodes Water Utilities Tariff.) Finally, the supplements provide a two-year warranty to the customer or property owner, if the customer is not the property owner, on the workmanship and materials of the LSLR and the restoration of surfaces. The two-year warranty begins upon the re-establishment of water service to the property after the LSLR has occurred. (*See id.*, Page 14.e. of each Rhodes Water Utilities Tariff.)

4. Aqua Has Supplied the Information Required Under 52 Pa. Code § 53.52(a)

In addition to the LSLR Plan, Aqua has provided the information and supporting data required by 52 Pa. Code § 53.52(a), related to revisions and supplements to a utility's tariff, which was attached as Exhibit C to Aqua's Petition for Approval of VWC's Lead Service Line

Replacement Program. Aqua has updated the supporting data to provide information for the Rhodes Water Utilities and is attached to the Settlement Petition as Exhibit C.

As summarized above, the Rhodes Water Utilities' LSLR Plan, as modified by the terms and conditions of the Settlement, includes and/or addresses all of the elements prescribed by Section 1311(b) of the Public Utility Code, the Commission's regulations, and the Commission's Rulemaking Order regarding LSLR plans. Moreover, the Rhodes Water Utilities' LSLR Plan mirrors Aqua's own Commission-approved LSLR Plan, which will allow Aqua to seamlessly administer the Rhodes Water Utilities' LSLR Plan and incorporate the Rhodes Water Utilities' lead service line replacement efforts into its own LSLR Plan should Aqua ultimately acquire the Rhodes Water Utilities' systems. Approval of the LSLR Plan, as modified by the Settlement, is in the public interest.

C. DESCRIPTION OF THE SETTLEMENT TERMS

Through settlement discussions, the Joint Petitioners negotiated the addition of specific requirements into the LSLR Plan to address concerns related to increasing the accessibility of customer communications, confirming transparency in reporting the Rhodes Water Utilities' LSLR efforts during the Plan period, and clarifying the use of Step-In Rights to address replacement of a COLSL to avoid termination. These additional terms enhance the customer protections provided for in the LSLR Plan as originally proposed and further advance the Commission's efforts to identify and replace lead service lines throughout the Commonwealth. These terms are also consistent with the terms reached in settlement of Aqua's LSLR Plan at Docket No. P-2023-3044459, which will allow Aqua to efficiently carry out lead service line replacement in the Rhodes Water Utilities service territories in line with its own LSLR Plan.

1. The Settlement Increases the Accessibility of the Plan’s Outreach Materials

Under Paragraph 15 of the Settlement, the Rhodes Water Utilities will make written communications to consumers – Exhibits A through Q of the LSLR Program – available in English with a notation in Spanish as to how to request the documents in Spanish and an additional notation as to how to request the documents in the other top two non-English languages spoken in Aqua’s service territory. (Settlement ¶ 15.)⁸ In addition, the Rhodes Water Utilities will create a notification letter to the consumer for Exhibit K – Pitcher Filter – with notations to request instructions for use of pitcher filter in Spanish and the other top two non-English languages spoken in Aqua’s service territory. The top two non-English languages spoken, other than Spanish, will be based on the top two most spoken languages throughout Aqua’s entire footprint. (Settlement ¶ 15.) In addition, Paragraph 14 of the Settlement requires Aqua to share with the OCA and OSBA the communications, outreach, and education materials referenced in Aqua’s Petition and developed in compliance with 52 Pa. Code § 65.56(c) promptly after such materials are finalized or updated by the Rhodes Water Utilities and used by the Rhodes Water Utilities in connection with the Plan. (Settlement ¶ 14.)

By making the Rhodes Water Utilities’ LSL outreach materials available to customers in Spanish and the other top two non-English languages spoken in Aqua’s service territory, the Rhodes Water Utilities’ efforts to replace LSLs will be more accessible to their customers, allow for greater understanding of the LSLR Plan, and increase the education of customers surrounding the dangers of lead, the importance of replacement, and the resources available. In addition, by providing the OCA and OSBA access to the outreach materials in a timely manner, additional input from consumer advocates is available to the Company and will help ensure that the outreach

⁸ Because of the small size of the Rhodes Water Utilities’ service territory, and Aqua’s position as Receiver, it is not practical to identify languages actually spoken in the Rhodes Water Utilities service territories.

materials address the needs of all its customers. For these reasons, these Settlement provisions are in the public interest and should be approved.

2. The Settlement Confirms Transparency in Reporting the Rhodes Water Utilities' LSLR Efforts During the Plan Period

Paragraphs 13 and 16 through 19 of the Settlement require Aqua to detail and make public certain details of the Rhodes Water Utilities' LSLR efforts throughout the period of the LSLR Plan. Initially, Paragraph 13 of the Settlement clarifies that the Rhodes Water Utilities will complete replacement of all lead service lines identified through its Service Line Inventory by December 31, 2037, in accordance with the U.S. EPA's Lead and Copper Rule Improvements. (Settlement ¶ 13.) Paragraphs 16 through 18 specify that Aqua will include the following information related to LSLRs in its Annual Asset Optimization Plan ("AAOP") during Aqua's Receivership duties: (1) after completion of LSLR projects in a project area, if Aqua finds lead in a utility or customer owned service line in the completed project area, Aqua will report on the location, number of affected pipes, and replacement date of LSL; and (2) reporting, by zip code, the number of COLSL replaced in the preceding year in the Rhodes Water Utilities' service territories. (Settlement ¶¶ 16, 18.) The Rhodes Water Utilities' Service Line Inventory will provide zip code information which can be used to identify service lines that have been inventoried and those identified as LSL or GRR. (Settlement ¶ 17.) Finally, the Settlement requires Aqua to use tools available, such as the Pennsylvania Department of Environmental Protection's PennEnviroScreen tool or Justice40 Initiative, to identify environmental justice areas and high levels of children's lead risk for targeting of inventory and replacement. (Settlement ¶ 19.)

These provisions of the Settlement increase transparency of both the progress of the Rhodes Water Utilities' LSLR Plan efforts as well as the locations of LSLs identified in the Rhodes Water Utilities' service territories. Incorporating zip code information related to LSL projects will

provide the Commission, the statutory advocates and other interested parties, as well as the general public important information regarding the location of LSLs within the Rhodes Water Utilities' service territories. Reporting will be made as part of Aqua's AAOP because the Rhodes Water Utilities' do not have approved LTIPs and, therefore, are not subject to the Commission's AAOP reporting requirements. Finally, the use of advanced tools to identify high risk communities will enable Aqua to identify and prioritize these areas for replacement of LSLs. For these reasons, these Settlement provisions are in the public interest and should be approved.

3. The Settlement Clarifies the Use of Step-In Rights to Address Replacement of a COLSL to Avoid Termination

Settlement Paragraph 20 clarifies the use of Step-In Rights to address replacement of a COLSL to avoid termination of service when a property owner who is not the resident is not responsive to the utility's offer to replace a COLSL. Paragraph 20 of the Settlement contains the tariff language defining Step-In Rights and detailing the instances in which Step-In Rights can be utilized if a resident of a premise is not the property owner. (Settlement ¶ 20.) Importantly, the tariff language also specifies that the utility must use Step-In rights to avoid termination when a valid medical certification or Protection From Abuse order (or other court order issued by a court of competent jurisdiction in this Commonwealth which provides clear evidence of domestic violence) is provided by the customer. The Settlement also requires Aqua to provide in Aqua's AAOP a list of any terminations performed at the discretion of Aqua in compliance with the new tariff language, which details the affected location, the reason for the termination, and the service termination date to the Commission and statutory advocates during Aqua's Receivership duties. (Settlement ¶ 20.)

The addition of language clarifying and setting forth the duties in exercising Step-In Rights related to the discovery of COLSLs was reached through considered negotiations by the Joint

Petitioners. The tariff language explains the utility's duties and alerts customers of their rights under to provide eligible documentation to avoid termination in the context of COLSL replacements. The reservation of its Step-In Rights in this manner balances the interests of the utility and customers by ensuring that replacement of LSLs can be carried out while also providing protections for customers who do not own the subject property. For these reasons, these Settlement provisions are in the public interest and should be approved.

D. PUBLIC BENEFITS

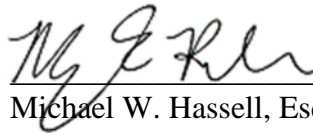
If approved, the Settlement will provide benefits to the customers and communities served by the Rhodes Water Utilities, including through the implementation of the detailed LSLR Plan and the incorporation of additional measures designed to enhance customer protections while ensuring LSLs are replaced in a timely and efficient manner. As explained above, the Settlement was reached through productive settlement discussions between the Joint Petitioners that considered a broad range of customer interests and the Settlement is consistent with the terms of Aqua's Commission-approved LSLR Plan. These commitments further the LSL efforts of both Aqua and the Rhodes Water Utilities, meet the requirements of the Public Utility Code and the Commission's regulations, and benefit the health and safety of the public.

Based on the foregoing, the Settlement should be considered just and reasonable and in the public interest, and the ALJ and the Commission should approve it without modification.

IV. CONCLUSION

WHEREFORE, for the reasons explained above, and those set forth in the Settlement, the terms and conditions of the Settlement are just and reasonable and in the public interest, and Deputy Chief Administrative Law Judge Mark A. Hoyer and the Pennsylvania Public Utility Commission should approve the Settlement without modification.

Respectfully submitted,



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Date: July 31, 2025

Counsel for Aqua Pennsylvania, Inc.

APPENDIX B

STATEMENT IN SUPPORT

Office of Small Business Advocate

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Aqua Pennsylvania, Inc., as the : Docket No. P-2024-3050248
Receiver for Venango Water Company :
For Approval of the Lead Service Line :
Replacement Program for Venango Water :
Company :

**STATEMENT OF
THE OFFICE OF SMALL BUSINESS ADVOCATE
IN SUPPORT OF THE
JOINT PETITION FOR SETTLEMENT**

I. Introduction

The Small Business Advocate is authorized and directed to represent the interests of the small business consumers of utility services in the Commonwealth of Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50. Pursuant to that statutory authority, On August 9, 2024, the Office of Small Business Advocate (“OSBA”) filed a Notice of Intervention in response to the Petition of Aqua Pennsylvania, Inc. (“Aqua,” or the “Company”) as the receiver for Venango Water Company (“Venango”) and allied to all Rhodes Water Company’s (“Rhodes”) utility customers for Approval of its Lead Service Line Replacement (“LSLR”) Program (“Petition”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on July 22, 2024.

The OSBA participated in the negotiations that led to the proposed settlement and is a signatory to the Joint Petition for Settlement (“*Joint Petition*”). The *Joint Petition* addresses the issue raised by this office in this proceeding. Therefore, the OSBA submits this statement in support of the *Joint Petition*.

II. The Commission's Policy on Settlements

Section 5.231(a) of the Commission's regulations, 52 Pa. Code § 5.231(a) (Formal Proceedings; Hearings; Settlement and Stipulations; Offers of Settlement) states, as follows:

It is the policy of the Commission to encourage settlements.

Similarly, Section 69.401 of the Commission's regulations, 52 Pa. Code § 69.104 (Settlement Guidelines and Procedures for Major Rate Cases – Statement of Policy; General) states, as follows:

In the Commission's judgment, the results achieved from a negotiated settlement or stipulation, or both, in which the interested parties have had an opportunity to participate are often preferable to those achieved at the conclusion of a fully litigated proceeding.

III. The Joint Petition is in the Public Interest of Aqua's Small Business Customers

The OSBA, the Office of Administrative Law Judge ("ALJ"), and the Commission are aware of the rising costs of utility service for all Commonwealth ratepayers, whether they are residential, small business, or industrial customers. The OSBA's primary focus in this proceeding has been to make certain that LSLRs proceed at a prudent pace, to limit the rate impact of LSLRs on Venango's and applied to all Rhodes' utility ratepayers, including small business customers.

The *Joint Petition* proposes that Aqua will replace all existing Company-owned and customer-owned lead service lines by December 31, 2027, or sooner if a new deadline is established by the Environmental Protection Agency or the Pennsylvania Department of Environmental Protection. *Joint Petition*, Paragraph 13. The OSBA submits that even if an accelerated 10-year deadline is implemented, the expected rate impact upon Aqua's small business customers will be *de minimis*.

Therefore, the OSBA has concluded that the *Joint Petition* has addressed the issue of a prudent replacement rate in a just and reasonable manner.

IV. Conclusion

Therefore, for the reasons set forth in the *Joint Petition*, as well as the factor enumerated in this statement, the OSBA supports the proposed *Joint Petition* and respectfully requests that the ALJ and the Commission approve the *Joint Petition* in its entirety.

Respectfully submitted,

/s/ Rebecca Lyttle
Rebecca Lyttle
Assistant Small Business Advocate
Attorney ID No. 201399

For:
NazAarah Sabree
Small Business Advocate

Commonwealth of Pennsylvania
Office of Small Business Advocate
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Harrisburg, PA 17101

Dated: July 30, 2025

APPENDIX C

STATEMENT IN SUPPORT

Office of Consumer Advocate

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Aqua Pennsylvania Water Inc., :
As Receiver For Venango Water Company : Docket No. P-2024-3050248
For Approval of a Lead Service Line :
Replacement Program for Venango Water :
Company :

STATEMENT OF SUPPORT
OF THE
OFFICE OF CONSUMER ADVOCATE

I. INTRODUCTION

On August 9, 2024, Aqua Pennsylvania, Inc. (Aqua or Company), as the receiver for Venango Water Company (VWC), filed with the Commission a Petition seeking approval of a Lead Service Line Replacement Program (LSLR Program) through Supplement No. 25 to Water – Pa. P.U.C. No. 3.

On August 15, the Office of Small Business Advocate (OSBA) filed a Notice of Intervention and Public Statement. On August 21, 2024, the Office of Consumer Advocate (OCA) filed a Notice of Intervention and Public Statement.

A Prehearing Conference Notice and Prehearing Conference Order were issued in this proceeding on August 29 and September 9, 2024, respectively, which scheduled a Prehearing Conference for September 30, 2024 before Deputy Chief Administrative Law Judge (ALJ) Mark A. Hoyer. By e-mail sent to the ALJ on September 9, 2024 by Aqua, the Parties requested that the Prehearing Conference be postponed to allow the Parties time to pursue settlement in this proceeding. A Hearing Cancellation was issued on September 16, 2024 granting this request.

On October 30, 2024, the Commission entered an order in a separate Section 529 proceeding in which Aqua was also established as receiver for five additional water utilities owned and operated by the owner of VWC: Cooperstown Water Company (CWC), Fryburg Water Company (FWC), Plumer Water Company (PWC), Sugarcreek Water Company (SWC), and West Hickory Water Company (WHWC) (collectively, Rhodes Water Utilities or RWU). Venango Water Company – Ex Parte Emergency Order Naming Aqua Pennsylvania, Inc. as Receiver, Docket Nos. M-2023-3042180 et al., Order (Oct. 17, 2024). The Commission’s Order stated that “the Lead Service Line Replacement (LSLR) Plan filed by Aqua Pennsylvania, Inc., as Receiver for the Venango Water Company currently pending at Docket No. P-2024-3050248, shall apply to Sugarcreek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, and Cooperstown Water Company and the requirements of 52 Pa. Code § 65.55(a) shall be waived so that Aqua Pennsylvania, Inc. shall not be separately required to file LSLR Plans for Sugarcreek Water Company, West Hickory Water Company, Plumer Water Company, Fryburg Water Company, and Cooperstown Water Company.” *Id.* at Ordering Paragraph 18.

On December 17, 2024, the ALJ emailed the Parties asking that the Parties provide a status report in this proceeding by January 7, 2025. The Parties submitted status reports on January 8, February 28, and April 1, 2025, which requested additional time to pursue settlement. On June 20, 2025, Aqua submitted a further Status Report on behalf of the Parties, notifying the ALJ that the parties had reached a settlement in principle of all issues and intended to file a Joint Petition for Settlement (Settlement).

The OCA, one of the signatory parties to the Settlement, finds the terms and conditions of the Settlement to be in the public interest.

II. STATEMENT IN SUPPORT

The proposed LSLR program and plan will allow the Rhodes Water Utilities (RWU) to recover the costs for LSL replacements, both Company-owned and customer-owned, through its base rates and DSIC. 66 Pa. C.S. § 1311(b)(2). For customers, the LSLR plan has the potential to provide both financial and public health benefits.

Section 1311(b)(2) of the Public Utility Code provides a process to eliminate the individual financial burden for replacing customer-owned LSLs by recovering those costs over the RWU's entire customer base. If a customer could not have otherwise afforded the replacement of the line, the customer will be able to maintain essential water service. Lead service lines also pose a direct health risk to customers. An LSLR program can protect public health by helping to ensure the timely removal of the customer-owned LSL.

A. Approval of Application (Settlement ¶ 11)

Under the Settlement, RWU's LSLR Program, as submitted by Aqua as Receiver for VWC, is approved, subject to the modifications contained in the Settlement. Settlement ¶ 11. Aqua, as Receiver, shall be responsible for implementing RWU's LSLR Program until such time when Aqua is neither Receiver nor owner of RWU. *Id.* If Aqua becomes the owner of RWU at the conclusion of the Section 529 Proceeding at Docket No. P-2020-3020914, Aqua's LSLR Program will control replacement of lead service lines in RWU's service territory and the VWC LSLR Plan will end. *Id.*

The settlement of Aqua's LSLR Program was approved by the Commission without modification and is substantively similar to VWC's LSLR program. *See Petition of Aqua Pennsylvania, Inc. For Approval of its Lead Service Line Replacement Program*, Docket No. P-2023-3044459, Order (April 10, 2025) (*Aqua LSLR Petition Order*). The OCA, as a signatory to

the settlement of Aqua’s LSLR Program, submitted a Statement in Support in the Aqua LSLR Program proceeding. *Id.* at 2. As RWU is under the receivership of Aqua, aligning the LSLR programs is reasonable and in the public interest.

B. Program Completion (Settlement ¶ 13)

On November 30, 2023, the U.S. Environmental Protection Agency (EPA) proposed the Lead and Copper Rule Improvements (LCRI), which includes a requirement for water systems to achieve 100% lead pipe replacement within 10 years.¹ LSLs pose a direct health risk to customers. An LSLR program can protect public health by helping to ensure the timely removal of the customer-owned LSL.

Under the Settlement, in accordance with the EPA’s LCRI, RWU will complete replacement of all lead service lines identified through its Service Line Inventory by December 31, 2037, or such other date as modified by the EPA or Pennsylvania Department of Environmental Protection (“DEP”). Settlement ¶ 13.

Replacing lead service lines as soon as practicable is crucial to public safety. Committing RWU to the EPA’s LCRI time period is a step towards ensuring that RWU replaces its lead service lines within a reasonable time frame.

C. Language Access (Settlement ¶¶ 14-15)

Under the Settlement, RWU will make written communications to consumers – Exhibits A through Q of the Plan, available in English with a notation in Spanish as to how to request the documents in Spanish and an additional notation as to how to request the documents in the other top two non-English languages spoken in the service territory. Settlement ¶ 15. The top two non-

¹ United States Environmental Protection Agency, Proposed Lead and Copper Rule Improvements, available at: <https://www.epa.gov/ground-water-and-drinking-water/proposed-lead-and-copper-rule-improvements> (previously accessed on April 17, 2025).

English languages spoken, other than Spanish, will be based on the top two most spoken languages throughout RWU's entire footprint. *Id.* Moreover, RWU will create a notification letter to the consumer for Exhibit K – Pitcher Filter – with notations to request instructions for use of pitcher filter in Spanish and the other top two non-English languages spoken in the service territory. *Id.* Additionally, RWU will share with the OCA the communications, outreach, and education materials referenced in RWU's Plan and developed by the Company in compliance with 52 Pa. Code §65.56(c) promptly after such materials are finalized or updated by the Company and used by the Company in connection with the Plan. Settlement ¶ 14.

Ensuring that RWU's customers can understand written communication material on this important public health issue was a serious concern of the OCA in negotiating this Settlement. Moreover, sharing important communications materials regarding public health with the OCA increases transparency. The Settlement's language access provisions enhance RWU's communication efforts regarding this important public health issue.

D. Annual Asset Optimization Plan Data (Settlement ¶¶ 16-18)

The Settlement requires RWU to provide additional data regarding the LSLR Plan in their Annual Asset Optimization Plan (AAOP) and lead service line inventory. Under the Settlement, following the completion of RWU's Lead Service Line (LSL) projects in a project area set forth in the LSLR Program, in the event the Company finds lead in a company or customer owned service line in said completed project area, the Company will provide a report detailing the location, number of affected pipes, and the replacement date to the Commission and the statutory advocates in the Company's AAOP during Aqua's Receivership duties. Settlement ¶ 16. RWU's Service Line Inventory will provide zip code information which can be used to identify service lines that have been inventoried and those identified as LSL or Galvanized Requiring Replacement ("GRR").

Settlement ¶ 17. During Aqua's Receivership duties, Aqua will report as part of Aqua's AAOP, by zip code, the number of COLSL replaced in the preceding year in the RWU service territory.

Settlement ¶ 18.

Providing additional data regarding LSLRs enhances transparency and accountability. Importantly, data organized by zip code can identify patterns and assess the effectiveness of LSLR efforts. Enhanced transparency and accountability regarding LSLRs is in the public interest.

E. Identification of Environmental Justice Areas and Children's Lead Risk (Settlement ¶ 19)

Under the Settlement, RWU will utilize tools available (e.g., the Pennsylvania Department of Environmental Protection's PennEnviroScreen tool or Justice40 Initiative) to identify environmental justice areas and high levels of children's lead risk for targeting of inventory and replacement. Settlement ¶ 19. Using these tools will help RWU prioritize LSLRs within vulnerable populations. This provision is in the public interest.

F. Step-In Rights (Settlement ¶ 20)

Section 65.58(c)(3) of the Commission's Regulations provides:

An entity may establish a process to address replacement of a customer-owned LSL to avoid termination of service when a property owner who is not the customer is nonresponsive to an entity's offer to replace a customer-owned LSL.

52 Pa. Code § 65.58(c)(3).

In accordance with 52 Pa. Code § 65.58(c)(3), RWU will include a section in its tariff providing Step-In Rights to address replacement of a COLSL to avoid termination of service when a property owner who is not the Resident is nonresponsive to an entity's offer to replace a COLSL. Settlement ¶ 20.

The agreed-upon tariff language provides specifically as follows:

A. Step In Rights Defined. In reference to 52 Pa. Code § 65.58(c)(3), Step-In Rights means the right of the Company to avoid termination of service to a property where the resident of the Property is not the property owner, and the property owner is nonresponsive to the Company's offer to replace a COLSL.

The Company can utilize Step-In Rights in the following circumstances where a Customer or occupier of a premise is not the property owner.

1. The Company has attempted to contact the property owner with an offer to replace the COLSL in accordance with the Company's LSLR Plan;
2. The Customer or the occupier of the Property is not the property owner; and
3. The Company has attempted to get authorization to replace the COLSL, the property owner cannot be identified, or the property owner has been notified and has not responded to the Company's offer to replace the COLSL.

B. Circumstances Where the Company Must Use Step-In Rights.

1. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer or occupant of the Property provides a medical certification signed by a licensed physician, nurse practitioner or physician's assistant to the Company by fax, email or mail (providing the contact information).
2. The Company shall use Step-In Rights to avoid the termination of water service and replace a COLSL when the Customer provides a Protection From Abuse (PFA) order, or other court order issued by a court of competent jurisdiction in this Commonwealth which provides clear evidence of domestic violence.
3. The Company shall use Step-In Rights to avoid the termination of water service to the Customer or the occupant of the Property except when, in the Company's reasonable judgement, replacement would place its workers or utility facilities at a safety risk and in such instance, the Company may use Step-In Rights at its discretion.

C. After the replacement is complete, the Company will restore roadways and public sidewalks, backfill any trenches excavated as part of the replacement process and will fill and seal any wall or floor penetrations caused by the service line replacement in the structure at the Property

(Company Restoration Work). No other restoration will be conducted for the Customer side replacement. The Company will not replace any landscaping, interior finishes, paving, seeding, or walkways (Private Side Restoration Work), and all restoration costs for such Private Side Restoration Work shall be borne by the property owner.

D. When the Company exercises Step-In Rights, the Company's liability shall be limited to the amount in Section V of its Water Tariff for any action brought against the Company, its officers, directors, employees and agents for damages arising from any and all liability, including liability to third parties and the property owner, for personal injury, including death, property damage, or other actions, damages, fines, penalties, claims, demands, judgments, losses, costs, expenses, suit and actions (including reasonable attorney's fees), for personal injury, including death, property damage or other injury, to the extent caused by or arising out of the work performed by the Company or its agents in replacing the COLSL and/or the Company Restoration Work that the Company is responsible for under subsection C above.

Settlement ¶ 20.

Additionally, the Settlement requires that, for any service termination performed at the discretion of RWU in compliance with the above tariff language, RWU shall provide a list of terminations of service detailing the affected location, the reason for the termination, and the service termination date to the Commission and the statutory advocates in Aqua's AAOP during Aqua's Receivership duties. Settlement ¶ 20.

Including Step-In Rights for COLSL replacements benefits RWU, customers, and residents affected by COLSL replacements. For customers and residents, Step-In Rights helps prevent the termination of vital water service, which can be harmful for customers. With the tariff language in the Settlement, if a property owner is nonresponsive, the COLSL replacement can still be performed without termination of water service. Moreover, specific Step-In Rights provisions related medical certification and Protection From Abuse (PFA) orders helps ensure that vulnerable customers receive continued water service. At the same time, the Step-In Rights in the Settlement

provide RWU the necessary discretion it needs to decide to not step-in and to not perform a replacement where doing the replacement would, in RWU's reasonable judgement, place its workers or utility facilities at a safety risk.

For RWU, the Settlement specifies clear and limited restoration work responsibilities for both RWU and property owners and provides clear limitation of liability for RWU relating to the replacement and restoration work. It serves the public interest to limit RWU's liability when exercising Step-In Rights so that RWU can be motivated to complete necessary replacements without exposing RWU to unreasonable litigation risk.

Given the public health concerns related to lead, the Settlement's Step-In Rights permit RWU to take proactive measures to replace COLSLs. Ensuring that all customers and residents do not face prolonged exposure to lead, regardless of the responsiveness of the property owner, promotes equity and the operational efficiency of RWU. The Step-In Rights contained in the Settlement serve the public interest, and serve and protect the interests of consumers and the utility alike, and thus should be adopted by the Commission.

III. CONCLUSION

The adoption of the Settlement results in an LSLR Plan with enhanced communications, greater transparency, and a clearer delineation of responsibilities compared to what was originally proposed. In consideration of the various elements of the Settlement, the OCA finds the Settlement to be in the public interest and in the interest of RWU's customers. For these reasons and the reasons discussed above, the terms and conditions of the Settlement should be approved by the Commission.

Respectfully submitted,

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