



**Erin K. Fure**  
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August 1, 2025

**VIA ELECTRONIC FILING**

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

**In re: Application of Pennsylvania-American Water Company –  
Wastewater Division for approval of the right to offer, render, furnish  
and supply wastewater service to the public in an additional portion of  
Douglass Township, Berks County, Pennsylvania  
Docket No. A-2025-3055740**

Dear Secretary Homsher:

In response to your Secretarial Letter of July 18, 2025, please find attached Pennsylvania-American Water Company's Responses to **CONFIDENTIAL** Set II Data Requests. Please note, the **CONFIDENTIAL** Set II Data Requests were from **CONFIDENTIAL** documents admitted as part of the Application, the questions nor the responses are **CONFIDENTIAL**.

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

Sincerely,

A handwritten signature in blue ink that reads "Erin K. Fure".

Erin K. Fure

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

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

<b>In re: Application of Pennsylvania-American Water Company for Approval of the Right to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Douglass Township, Berks County, Pennsylvania (Evans Road)</b>	: : : : : : :	<b>Docket Number A-2025- 3055740</b>
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**CERTIFICATE OF SERVICE**

I hereby certify that I am this day serving the above-referenced Responses upon the people and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

**Service in the manner listed below addressed as follows on August 1, 2025**

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

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

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

Respectfully Submitted,



Erin K. Fure, Esquire (PA ID #312245)  
Pennsylvania-American Water Company  
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Email: [erin.fure@amwater.com](mailto:erin.fure@amwater.com)

**Attorney for Pennsylvania-American  
Water Company**

**Application of Pennsylvania-American Water Company – Wastewater Division  
for Approval of the Right to Offer, Render, Furnish and Supply Wastewater Service to  
the Public in an Additional Portion of Douglass Township, Berks County, Pennsylvania**

**Docket No. A-2025-3055740**

**PAWC’s Responses to CONFIDENTIAL TUS Set II Data Requests**

- A-10.** The Application’s Exhibit E included a copy of the Pennsylvania Department of Environmental Protection’s (DEP’s) approval letter dated October 22, 2024, of the Act 537 Plan Minor Update Revision (Planning Module) for the property located at 710 Evans Road, Douglass Township, Berks County (Property). Within the Planning Module’s Tab 7, Page R-12, Item 7 noted that two easements are needed, and Tab 10.1 identified that existing and proposed facilities are on private property. However, the Application’s Section 15 indicated that PAWC would not need to obtain any easements to serve the requested territory due to the sewer being in the public road. Please provide responses to the following:
- a. Clarify whether all the proposed facilities are to be located entirely in public rights-of-way;
  - b. If proposed facilities will be located on private property, clarify whether any easements are required for the proposed facilities, identify the entity responsible for obtaining required easements, and the estimated easement costs; and
  - c. Clarify if PAWC will fund these easement costs and identify PAWC’s anticipated sources of funding (e.g., internally generated funds, short-term debt, etc.).

**Response:**

- a. The proposed low-pressure sewer main will be installed in the public right-of-way. There is sufficient room between the edge of pavement and edge of right-of-way for the 1-1/4” sewer main.
- b. Only the Property owned facilities (sewer lateral and grinder pump) will be on private property.
- c. No anticipated easements.

**Responsible Witness:** **Michael Evenson, P.E., - Engineering Project Manager  
Pennsylvania-American Water Company – Southeastern  
Region**

**Date:** **August 1, 2025**

## VERIFICATION

I, Michael Evenson, P.E., hereby state that the facts set forth in the attached Responses are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.

*Michael Evenson*

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Michael Evenson, P.E., Engineering Project Manager  
Pennsylvania-American Water Company

Dated: August 1, 2025