



August 7, 2025

VIA E-FILING

Jonathan P. Nase

Direct Phone 717-773-4191

Direct Fax 215-372-2340

jnase@cozen.com

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Second St.
Harrisburg, PA 17120

Re: Petition of Veolia Water Pennsylvania, Inc. for Approval of a Lead Service Line Replacement Program; Docket No. P-2023-3042107

Corrected Page 68 of Tariff Supplement No. 75 to Water – Pa. P.U.C. No. 7

Dear Secretary Homsher:

VWPA is re-filing page 68 of Tariff Supplement No. 75 to Water – Pa. P.U.C. No. 7 with minor language/formatting corrections at the request of Commission staff. A clean copy is enclosed, as is a red-lined copy showing changes in VWPA's most recently-filed tariff supplement.

Copies have been served as shown on the enclosed Certificate of Service.

Please contact me if you have any questions or concerns about the enclosed filing.

Sincerely,

COZEN O'CONNOR

By: Jonathan P. Nase

Counsel for *Veolia Water Pennsylvania, Inc.*

JPN
Attachments

cc: Per Certificate of Service
Larry Finnicum, Vice President and General Manager
Maryanne Hatch, Vice President – Rates and Regulatory Affairs

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of Veolia Water Pennsylvania, Inc. For :
Approval of a Lead Service Line Replacement : Docket No. P-2023-3042107
Program :

CERTIFICATE OF SERVICE

I hereby certify that I have this 7th day of August, 2025, served a true copy of the foregoing **Corrected Page 68 of Tariff Supplement No. 75 to Water – Pa. P.U.C. No. 7**, upon the parties of record in this proceeding, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant) in the manner and upon the persons listed below:

SERVICE BY E-MAIL ONLY

Harrison W. Breitman, Esq.
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
HBreitman@paoca.org
Counsel for the *Office of Consumer Advocate*

Steven C. Gray, Esq.
Rebecca Lyttle, Esq.
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101-1923
sgray@pa.gov
relyttle@pa.gov
Counsel for the *Office of Small Business Advocate*

Respectfully submitted,



Jonathan P. Nase, Esq.
Counsel for *Veolia Water Pennsylvania, Inc.*

CLEAN COPY

**Petition of Veolia Water Pennsylvania, Inc. for Approval of a
Lead Service Line Replacement Program
Docket No. P-2023-3042107**

**Corrected Page 68 of
Tariff Supplement No. 75 to Water – Pa. P.U.C. No. 7
Effective August 14, 2025**

CUSTOMER OWNED LEAD SERVICE LINE REPLACEMENTS (COLSL) (Cont)

Customer Service Line: The Customer's service line shall extend from the Property to the Curb Stop or curb line or such point as designated by the Company. All connections, service lines and fixtures owned by the Customer shall be maintained by the Customer in good order, and all meters and appurtenances owned by the Company and located on the Property of the Customer shall be protected properly by the Customer. All leaks in or other deteriorated condition of the Customer's service line or any other pipe or fixture in or upon the premises supplied must be repaired immediately by the owner or occupant of the premises.

Customer Owned Lead Service Line (COLSL): The portion of the lead service line extending from the curb, property line or entity connection to an entity's water meter or, if the entity's meter is located outside of the structure or water is not metered by the entity, at the first shutoff valve located within the interior of the structure.

Lead Service Line: 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 is considered a lead service line if it ever was or is currently downstream of any lead service line or service line of unknown material.

Shutoff Valve: In the event a shutoff valve is not located along a specific length of pipe within a structure, the entity may install a shutoff valve to serve as a point of demarcation between the property's service line and the property's interior water distribution piping within 12 inches of the property's structure.

An entity shall perfect its ownership of the portion of the service line located within the then existing right-of-way in conformance with its Commission-approved tariff to ensure that the entity can obtain necessary permits during the planning phase of a LSLR project.

Partial Lead Service Line Replacements

- A. Neither a customer nor a property owner may install a partial LSLR. A partial LSLR must result in termination of service until such time as the entity can replace the entity-owned LSL under § 65.62 (relating to prohibition on partial LSLRs).
- B. Where a customer or a property owner, if the customer is not the property owner, elects to replace the customer-owned LSL, the customer or property owner shall replace the customer-owned LSL concurrent with the entity replacing the entity-owned LSL, whereby the customer or property owner, if the customer is not the property owner, shall provide the public utility or authority at least 90 days' notice prior to replacing the COLSL.
- C. The Company will not connect an applicant for water service to the entity-owned service line at a property where a customer or property owner, if the customer is not the property owner, previously refused or failed to accept an entity's offer of a LSLR until the applicant verifies the replacement of the customer-owned LSL by providing a paid invoice from a licensed contractor where applicable or a verified statement from a licensed contractor attesting to completion of the LSLR.
- D. Where a customer or property owner, if the customer is not the property owner, refuses, or fails to accept, an entity's offer to replace a customer-owned LSL, the Company shall replace the entity-owned portion of the LSL in accordance with the entity's LSLR plan and terminate service until such time as the customer owned LSL is replaced.
- E. Neither a customer nor a property owner may install a partial LSLR. A partial LSLR must result in termination of service until such time as the Company can replace the entity-owned LSL under Title 52 Pa. Code § 65.62. Where an entity has reasonable evidence indicating service is being provided using a partial LSLR installed after July 22, 2022, by a customer or property owner, if the customer is not the property owner, the Company shall terminate service until such time as LSLs are replaced.

REDLINED COPY

**Petition of Veolia Water Pennsylvania, Inc. for Approval of a
Lead Service Line Replacement Program
Docket No. P-2023-3042107**

**Corrected Page 68 of
Tariff Supplement No. 75 to Water – Pa. P.U.C. No. 7
Effective August 14, 2025**

CUSTOMER OWNED LEAD SERVICE LINE REPLACEMENTS (COLSL) (Cont)

Customer Service Line: The Customer's service line shall extend from the Property to the Curb Stop or curb line or such point as designated by the Company. All connections, service lines and fixtures owned by the Customer shall be maintained by the Customer in good order, and all meters and appurtenances owned by the Company and located on the Property of the Customer shall be protected properly by the Customer. All leaks in or other deteriorated condition of the Customer's service line or any other pipe or fixture in or upon the premises supplied must be repaired immediately by the owner or occupant of the premises.

Customer Owned Lead Service Line (COLSL): The portion of the lead service line extending from the curb, property line or entity connection to an entity's water meter or, if the entity's meter is located outside of the structure or water is not metered by the entity, at the first shutoff valve located within the interior of the structure.

Lead Service Line: 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 is considered a lead service line if it ever was or is currently downstream of any lead service line or service line of unknown material.

Shutoff Valve: In the event a shutoff valve is not located along a specific length of pipe within a structure, the entity may install a shutoff valve to serve as a point of demarcation between the property's service line and the property's interior water distribution piping within 12 inches of the property's structure.

An entity shall perfect its ownership of the portion of the service line located within the then existing right-of-way in conformance with its Commission-approved tariff to ensure that the entity can obtain necessary permits during the planning phase of a LSLR project.

Partial Lead Service Line Replacements

- A. Neither a customer nor a property owner may install a partial LSLR. A partial LSLR must result in termination of service until such time as the entity can replace the entity-owned LSL under § 65.62 (relating to prohibition on partial LSLRs).
- B. Where a customer or a property owner, if the customer is not the property owner, elects to replace the customer-owned LSL, the customer or property owner shall replace the customer-owned LSL concurrent with the entity replacing the entity-owned LSL, whereby the customer or property owner, if the customer is not the property owner, shall provide the public utility or authority at least 90 days' notice prior to replacing the COLSL.
- C. The Company will not connect an applicant for water service to the entity-owned service line at a property where a customer or property owner, if the customer is not the property owner, previously refused or failed to accept an entity's offer of a LSLR until the applicant verifies the replacement of the customer-owned LSL by providing a paid invoice from a licensed contractor where applicable or a verified statement from a licensed contractor attesting to completion of the LSLR.
- D. Where a customer or property owner, if the customer is not the property owner, refuses, or fails to accept, an entity's offer to replace a customer-owned LSL, the Company shall replace the entity-owned portion of the LSL in accordance with the entity's LSLR plan and terminate service until such time as the customer owned LSL is replaced.
- E. Neither a customer nor a property owner may install a partial LSLR. A partial LSLR must result in termination of service until such time as the Company can replace the entity-owned LSL under Title 52 Pa. Code § 65.62. Where an entity has reasonable evidence indicating service is being provided using a partial LSLR installed after July 22, 2022, by a customer or property owner, if the customer is not the property owner, the Company shall terminate service until such time as LSLs are replaced.