



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

August 26, 2025

IN REPLY PLEASE  
REFER TO OUR FILE

Docket No. A-2025-3055966  
Utility Code 212285

ERIN K FURE ESQUIRE  
PENNSYLVANIA AMERICAN WATER COMPANY  
852 WESLEY DRIVE  
MECHANICSBURG PA 17055  
[ERIN.FURE@AMWATER.COM](mailto:ERIN.FURE@AMWATER.COM)

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

Dear Attorney Fure:

On June 26, 2025, Pennsylvania-American Water Company (PAWC) filed the above-captioned document (Application) with the Pennsylvania Public Utility Commission (Commission). For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

Please forward the information to the Secretary of the Commission at the address listed below **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

**Your answers must be verified per 52 Pa Code § 1.36.** Accordingly, you must provide the following statement with your responses:

*I, [print name of appropriate company representative], hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).*

Signature \_\_\_\_\_  
Title \_\_\_\_\_  
Date \_\_\_\_\_

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the review, please send a copy of the response to Marlon Livingston in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at [marlolivin@pa.gov](mailto:marlolivin@pa.gov). Please also direct any questions to Marlon Livingston at telephone number (717) 787-4386. Thank you in advance for your cooperation.

Sincerely,



Matthew L. Homsher  
Secretary

Enclosure: TUS Data Request Set 2

cc: Darryl Lawrence, Office of Consumer Advocate (w/enclosure), [ra-oca@paoca.org](mailto:ra-oca@paoca.org)  
Melanie El Atieh, Office of Consumer Advocate (w/enclosure), [melatieh@paoca.org](mailto:melatieh@paoca.org)  
NazAarah Sabree, Office of Small Business Advocate (w/enclosure), [ra-sba@pa.gov](mailto:ra-sba@pa.gov)  
Allison Kaster, Bureau of Investigation & Enforcement (w/enclosure), [akaster@pa.gov](mailto:akaster@pa.gov)

## TUS Data Request Set 2

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

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

- A-13. In response to Data Request A-5, PAWC provided a revised Exhibit K in TUS-A-5\_Attachment. This revised exhibit indicated that the Residential units of Phase 1B will have 5/8-inch meters installed. In response to Data Request A-3, however, PAWC indicated that the 47 townhomes of Phase 1B will have one-inch meters installed. Please reconfirm the water meter quantities, sizes, and costs for the Phase 1B townhomes.
- A-14. PAWC's response to Data Request A-7 affirmed that Seneca Trails, LLC (Developer) obtained certain approvals from Jackson Township and Butler County Conservation District for the main extension. However, the response did not identify required permits and their costs, and did not state if the costs of the permits were included in the estimated total project costs. Please provide responses to the following:
- a. Identify the permits required to complete the main extension project;
  - b. Identify the costs to obtain each permit;
  - c. Identify if these costs were included in the estimated total project costs; and
  - d. Clarify whether these obtained permits are contributions by the Developer.
- A-15. In response to Data Request A-8, PAWC provided a copy of the recorded subdivision plan for the Development's Phase 5 as TUS-A-8.2\_Attachment, which indicates on Pages 1 and 5 that the Development's Phase 5 is approximately 40 acres of a 46.36 acre subdivision. However, PAWC's requested territory map in the Application's Exhibit B-1 indicated the requested territory's Area 2, which includes Phase 5, is 119.2 acres. Please provide responses for each of the following:
- a. Quantify the additional requested territory area in Area 2 that is outside of Phase 5;
  - b. Confirm whether the additional requested territory area in Area 2 that is outside of Phase 5 includes the remaining area of the Development's Phases 3 and 4 that has not been certificated to PAWC and an area that is within approximately 1,000 feet of proposed facilities on Gudenkunst Road; and
  - c. Clarify why it is necessary or proper for PAWC to be certificated to serve the additional requested territory area in Area 2 that is outside of Phase 5 (e.g., the Development's Phases 3 and 4 require public water service and other properties may request public water service as needed).

## TUS Data Request Set 2

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- A-16. PAWC's facility map in the Application's TUS-A-1 Attachment identified proposed facilities (Prior Phase Facilities) that extend north from Phase 5 into the Development's Phases 3 and 4 identified in Exhibit D of PAWC's Application at Docket A-2020-3020981. However, the Application and PAWC's supplemental responses did not include required information for the Prior Phase Facilities. Please provide responses for each of the following
- a. Provide a detailed breakdown of Prior Phase Facility quantities, sizes, materials, and costs by major plant account (i.e., mains, services, meters and appurtenances, fire hydrants, etc.);
  - b. Provide a timeline for the installation of the Prior Phase Facilities with an estimated completion date;
  - c. Identify the sources of funding for Prior Phase Facilities (e.g., developer advances in aid of construction under PAWC's standard main extension agreement, PAWC internally generated funds, PAWC short-term debt, etc.)
  - d. Provide revised responses to Data Requests A-3, A-5, A-6, A-7, A-8, and A-9, to include separate responses that address the Prior Phase Facilities and the most recent approved subdivision plan for the Development's Phases 3 and 4.
- A-17. Data Request A-11 asked that PAWC specify how the areas outside of the Development will receive wastewater service. PAWC's response appears to explain the Development's stormwater management system. Please specify how areas in the requested territory that are outside of the Development receive wastewater service.