

September 9, 2025

Via E-Filing

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

RE: City of Lancaster-Water Bureau
P-2023-3041043

Dear Secretary Homsher:

Enclosed for filing, and consistent with the Interim Order in this matter dated August 20, 2025, please find:

1. The City of Lancaster's Petition, filed on May 31, 2023, with accompanying exhibits;
2. The Direct Testimony of Christine Volkay-Hilditch, P.E., BCEE, Deputy Director of Public Works of the City of Lancaster; and
3. The approval and consent form the City will utilize with customers prior to performing customer-side LSLR replacements, designated as Exhibit 2 and attached to the Amended Joint Petition for Settlement filed on July 31, 2025.

Please contact me with any questions. Thank you.

Sincerely,

Shane P. Simon

Shane P. Simon

Encls.

cc: All Parties

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of The City of Lancaster – Water Bureau for Approval of A Lead Service Line Replacement Program and Related Tariff Changes, Pursuant to 66 Pa. C.S.A. § 1311(b) and 52 Pa. Code §§ 65.51, et seq.	: : : : : :	Docket No. P-2023-_____
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**PETITION OF THE CITY OF LANCASTER – WATER BUREAU
FOR APPROVAL OF A LEAD SERVICE LINE REPLACEMENT PROGRAM
AND RELATED TARIFF CHANGES**

TO THE HONORABLE PENNSYLVANIA PUBLIC UTILITY COMMISSION:

AND NOW, the City of Lancaster – Water Bureau (the “City” or “Water Bureau”), by and through its undersigned counsel, and, pursuant to Section 1311(b)(2) of the Pennsylvania Public Utility Code (“Code”), 66 Pa. C.S.A. § 1311(b)(2); Section 65.61 *et seq.* of the Rules and Regulations (“PUC Regulations”) of the Pennsylvania Public Utility Commission (“Commission”), 52 Pa. Code §§ 65.51, *et seq.*; and Section 5.41 of the PUC Regulations, 52 Pa. Code § 5.41, hereby petitions the Commission for approval of the City’s Lead Service Line Replacement Program (“LSLR Program”) and revisions to its tariff¹ that will authorize the City to replace customer-owned lead service lines (“LSLs”) and to recover the associated costs related to those replacements as set forth herein and in the City’s LSLR Program. In accordance with the LSLR Program and proposed tariff revisions, upon approval by the Commission, the City will be able to replace customer-owned LSLs at its sole cost and recover a return on, and a return of, those costs as permitted under Act 120.² In support thereof, the City respectfully represents as follows:

¹ The City’s proposed tariff revisions are attached hereto as **Exhibit A**.

² Act of October 24, 2018, P.L. 738, No. 120.

I. INTRODUCTION

1. In connection with the settlement reached in the City’s DSIC proceeding, in Docket No. R-2022-3035591, the City agreed to remove all costs related to replacement of City-owned LSLs from its LTIP and to instead seek approval of an LSLR Program from the Commission for service provided in the PUC Jurisdictional Area, with a filing to be made on or before May 31, 2023,³ which would permit recovery of all costs associated with replacement of both the City-owned and customer-owned LSLs.

2. Accordingly, the City is hereby seeking approval of its LSLR Program, including its LSLR Plan, which will be contained in its updated LTIP⁴ (**Exhibit B**), and associated tariff revisions required to effectuate customer-owned LSL replacements and recovery of, and on, the expenses incurred in association with those replacements.

3. The City will work collaboratively with the Office of Consumer Advocate (“OCA”) and the Commission’s Bureau of Investigation & Enforcement (“I&E”) in connection with the review of this Petition and the LSLR Program.

II. REQUEST FOR EXPEDITED APPROVAL

4. Due to ongoing planned replacement projects where it is anticipated that the City will encounter customer-owned LSLs, the City requests expedited review and approval for it to begin replacement of customer-owned LSLs immediately and without causing delay.

³ See Joint Petition for Settlement, Docket No. P-2022-3035591, at ¶ 16(g).

⁴ The LSLR Plan will be set forth in the City’s proposed updated LTIP for the period 2023-2027, which is currently pending approval before the Commission in connection with the Joint Stipulation of Settlement submitted at Docket No. P-2022-3035591. Accordingly, what would be included as Section 8 to the LTIP is attached hereto as **Exhibit B**. A copy of the currently pending LTIP is attached hereto as **Exhibit C**.

III. BACKGROUND

5. The City of Lancaster is an incorporated municipality in Lancaster County with a population of approximately 57,453.

6. The City provides water service to 176,328 customers outside the City of Lancaster in portions of the following municipalities in Lancaster County, Pennsylvania: (1) Lancaster Township; (2) Manheim Township; (3) Millersville Borough; (4) West Lampeter Township; (5) Pequea Township; (6) Manor Township; (7) West Hempfield Township; (8) East Hempfield Township; and (9) East Lampeter Township.⁵

7. The City's water service outside of its municipal limits is regulated by the Commission under the terms and provision of the Code, 66 Pa. C.S. § 101, *et seq.*

8. Lead is a heavy metal that commonly occurs in our environment. While humans can be exposed to lead through a variety of sources, including dust, soil, or paint chips, by far the most common source of lead exposure is ingestion from drinking water. The deleterious health effects of lead are now well-recognized. The Pennsylvania Department of Environmental Protection ("PADEP") advises that "[l]ead can cause serious health problems if too much enters your body from drinking water or other sources."⁶ Lead can "cause damage to the brain and kidneys, interfere with the production of red blood cells that carry oxygen to all parts of [the] body. The greatest risk of lead exposure is to infants, young children, and pregnant women."⁷

⁵ The service area outside of the City of Lancaster is often referred to herein as the "PUC Jurisdictional Area" and those customers are often referred to as "Jurisdictional Customers" or "Outside Customers."

⁶ See PADEP, "Lead in Drinking Water." Available at: <https://www.dep.pa.gov/Citizens/My-Water/PublicDrinkingWater/pages/lead-in-drinking-water.aspx> (last accessed May 12, 2023).

⁷ *Id.*

9. Before the adverse effects of lead in drinking water were well-studied or recognized, it was common for water service to be provided through LSLs. This changed in 1986, when Congress passed the Safe Drinking Water Act (“SDWA”).⁸ In relevant part, the SDWA empowered the United States Environmental Protection Agency (“EPA”) to set standards for drinking water quality and supervise the states’ in their implementation of these standards. The SDWA also set standards limiting the concentration of lead in public water systems.

10. Pennsylvania followed suit in 1991 with the passage of the Pennsylvania System Lead Ban and Notification Act (“SLBNA”).⁹ The SLBNA prohibited “the sale of certain leaded materials used in plumbing systems and” prohibited “their use in plumbing system construction, modification, and repair.”¹⁰ In 2018, the Pennsylvania General Assembly passed, and the Governor signed, Act 120, which became law on October 24, 2018, and amended the Code to facilitate a water utility’s ability to replace customer-owned LSLs.¹¹

11. Currently, the EPA imposes a 15 µg/L action level for lead and the PADEP imposes a 0.015 mg/L action level for lead.¹² These are the same figure expressed differently, *i.e.* 15 micrograms per liter is the same as 0.015 milligrams per liter.

12. The City recognizes the need to address LSLs. Thus, during the COVID-19 pandemic, the City proactively digitized its service line records, which had been on paper. The City inputted the information from these records into the City’s Geographic Information System

⁸ See 42 U.S.C. § 300f - § 300j-27.

⁹ See 35 Pa.C.S. § 723.1 - §723.17.

¹⁰ 35 Pa.C.S. § 723.2(1).

¹¹ 66 Pa.C.S. § 1311(b).

¹² See 40 C.F.R. § 141.80(c)(2); 25 Pa. Code § 109.1102(a)(1).

(“GIS”). This process alerted the City to the existence of eighty-five (85) LSLs in the PUC-Jurisdictional Area. These LSLs are spread out in several older developments.

13. Under the City’s currently-effective tariff, the customer owns the service line from the curb stop to the meter.¹³ The City then owns the portion of the service line from the curb stop to the main.¹⁴ Ownership of the customer-side portion of a service line will **not** change as part of the City’s LSLR Plan. Nor will the general responsibility for the customer to maintain his or her portion of the service line.¹⁵

14. Based on the City’s prior experience, the average estimated cost to replace a service line from the curb stop to the meter is approximately \$12,000.00. This average excludes any projects for which major excavation work was required to complete the replacement and is based on replacements to date, which have largely been in dense urban areas where the residence can be very close to the sidewalk

IV. THE LEGAL STANDARD FOR REPLACEMENT AND RECOVERY OF COSTS ASSOCIATED WITH LSLs

15. The Commission has previously approved LSLR Programs for utilities subject to its jurisdiction, including: York Water Company,¹⁶ Pennsylvania-American Water Company,¹⁷

¹³ See City of Lancaster – Water Bureau Tariff-Water Pa. P.U.C. No. 6, at 2nd Revised Page No. 9 (effective June 29, 2022). Available at: <https://www.cityoflancasterpa.gov/wp-content/uploads/2019/08/City-of-Lancaster-Water-Tariff-Suppl.-No.-48-Effective-June-29-2022.pdf> (last accessed May 12, 2023).

¹⁴ *Id.*

¹⁵ *Id.* at 2nd Revised Page No. 13, § 4.15.

¹⁶ *Petition of The York Water Co. for an Expedited Order Authorizing Limited Waivers of Certain Tariff Provisions and Granting Accounting Approval to Record Costs of Certain Customer-Owned Service Line Replacements to the Company’s Service Account*, Docket No. P-2016-2577404 (Order Entered Mar. 8, 2017).

¹⁷ *Petition of Pennsylvania-American Water Co. For Approval of Tariff Changes and Accounting and Rate Treatment Related to Replacement of Lead Customer-Owned Service Pipes*, Docket No. P-2017-2606100 (Order Entered Oct. 3, 2019)

Aqua Pennsylvania, Inc.,¹⁸ and Pittsburgh Water & Sewer Authority.¹⁹ Each of these approvals occurred prior to the Commission’s promulgation of the PUC Regulations, which became effective on July 23, 2022, to aid in implementation of Section 1311(b) of the Code and evaluation of requests for approvals sought thereunder (the “LSL Rules”).

16. Section 1311(b)(2)(i) of the Code provides that the value of the property of a public utility providing water service shall include the original cost incurred by the public utility for the replacement of a customer-owned LSL, performed concurrent with a scheduled utility main replacement project or under a commission-approved program, but that the customer shall continue to own the replacement water service line. The original cost incurred is to be “deemed other related capitalized costs that are part of the public utility’s distribution system”, 66 Pa. C.S.A. § 1311(b)(2)(ii), and these costs may be allocated “among each customer, classes of customers and types of service” *id.* at § 1311(b)(2)(iv).

17. Section 1311(b)(2) further provides that in connection with its request for Commission approval for the replacement of the customer-owned LSL, the utility must provide a new tariff supplement, which must include a cap on the maximum number of customer-owned LSLs that can be replaced annually. *See id.* at § 1311(b)(2)(v) and (vi).

A. Time For LSL Replacement.

18. Pursuant to Section 65.52 of the LSL Rules, the City is deemed to be a Municipal Corporation. Accordingly, it has until July 22, 2052 (30 years from the effective date of the LSL Rules) to replace *all* LSLs, whether City-owned or customer-owned, in the PUC Jurisdictional

¹⁸ *Petition of Aqua Pennsylvania, Inc. for Approval of Tariff Changes Authorizing Replacement of Customer-Owned Lead Service Lines*, Docket No. P-2020-3021766 (Order Entered Jul. 15, 2021).

¹⁹ *Petition of The Pittsburgh Water and Sewer Auth. for Approval of Its Long-Term Infrastructure Improvement Plan*, Docket No. P-2018-3005037 (Order Entered Feb. 4, 2021).

Area. *See* 52 Pa. Code. § 65.53(b). In addition to the LSL Rules, the PADEP and federal Lead and Copper Rules (“LCR”)²⁰ also set forth requirements relating to the time for LSL replacements.

B. LSLR Program Petition Requirements.

19. Pursuant to Sections 65.54 and 65.55(a) of the LSL Rules, a petition seeking approval of an LSLR Program must:

- (a) Be served upon the Commission, OCA, I&E, the Office of Small Business Advocate (“OSBA”) and the parties of record in the City’s most recent base rate case;²¹
- (b) Include a modified LTIP containing an LSLR plan that is a separate and distinct component thereof;²²
- (c) Include an LSLR Program that is filed within two years of July 23, 2022²³ and includes:²⁴
 - (i) A LSLR plan as described in § 65.56 (relating to LSLR plan requirements);²⁵
 - (ii) 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);²⁶
 - (iii) 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).²⁷

²⁰ 40 C.F.R. § 141.1, *et seq.* and 25 Pa. Code § 109.1101 to § 109.1108.

²¹ 52 Pa. Code § 65.54(a).

²² *Id.* at § 65.54(b); *see also* **Exhibit B**, City’s LSLR Plan.

²³ *See* 52 Pa. Code § 65.55(a) (providing two-year compliance period for Municipal Corporations).

²⁴ *See id.* at § 65.55(b).

²⁵ *Id.* at § 65.55(b)(1).

²⁶ *Id.* at § 65.55(b)(2).

²⁷ *Id.* at § 65.55(b)(3).

C. LSLR Plan Requirements.

20. The LSLR plan must contain, at a minimum:

- (a) A service line inventory, which complies with the [EPA] regulation at 40 C.F.R. 141.1--143.20, as enforced by the [PADEP],²⁸ and identifies any underlying assumptions contained therein;²⁹
- (b) A planning and replacements section,³⁰ which includes, among other things:
 - (i) The entity's projected annual investment in LSL replacements and financing sources for same;
 - (ii) The projected number of LSLs to be replaced each calendar year with explanation of how the projection was determined and a statement that the number is consistent with the entity's annual cap on LSL replacements;
 - (iii) The prioritization criteria considered by the entity when developing the LSLR schedule;
 - (iv) An explanation of the entity's processes and procedures to address emergency repairs or replacements which reveal LSLs;
 - (v) The entity's processes and procedures to obtain acceptance of a LSLR prior to LSLR project commencement from the customer/property owner and following acceptance;
 - (vi) The entity's lead/material recycling and disposal efforts, including a description of what the entity will do with proceeds from recycling and disposal efforts;
 - (vii) The industry-accepted practices that the entity plans to use to replace entity-owned and customer-owned LSLs; and
 - (viii) The procedure for documenting a customer/property owner's refusal of, or failure to accept, the offer by the entity to replace a LSL.
- (c) A communications, outreach and education section, which complies with EPA regulations at 40 C.F.R. 141.85 (regarding public education and

²⁸ *Id.* at § 65.56(a)(1) and (a)(3) (related to timing of inventory)

²⁹ *Id.* at § 65.66(a)(4); *see also* §§ 65.66(a)(5) and (a)(6) (requiring that the entity provide information to the Commission on the progress of its service line inventory in its annual LSLR program report and once complete, to incorporate the inventory into the next LSLR plan update).

³⁰ 52 Pa. Code § 65.66(b).

supplemental monitoring and mitigation requirements), and which includes copies of all printed and broadcast material to be distributed under the LSLR Program.³¹

D. Minimum Requirements For Tariff Supplement.

21. Section 65.58 of the LSL Rules sets forth the proposed changes that will be deemed necessary to implement the LSLR Program, addressing at a minimum:

- (a) A cap on the number of LSLs that can be replaced annually;
- (b) Information relating to service line demarcation, including a definition for customer-owned LSLs;
- (c) Information related to partial LSL replacements;³²
- (d) Reimbursements for prior customer-owned LSL replacements, as appropriate; and
- (e) A warranty for the work performed by the entity or its contractor for a term of not less than two years, and coverage information.

E. Accounting Requirements.

22. Section 65.60 of the LSL Rules mandates that costs for LSL replacements must be recorded under separate and distinct subaccounts, and permits the entity to defer income taxes related to LSL replacements under certain circumstances.

V. THE CITY'S PROPOSAL FOR LSL REPLACEMENTS

23. The various LSL-related regulations contain differing time frames as to when LSLs must be replaced. The PUC requires replacement within a thirty (30) year period from the effective date of the LSL Rules, *i.e.*, on or before July 22, 2052.³³ The City, a municipal corporation, will replace all LSLs within thirty (30) years.

³¹ *Id.* at 65.56(c)(1). Class A public utilities are also required to develop an LSLR section of their website within 12 months of Commission approval of the LSLR Program. *See* § 65.56(c)(2).

³² For more information regarding partial LSL replacements, *see* 52 Pa. Code § 65.62.

³³ 52 Pa. Code § 65.53(b).

A. The City's Plan For Customer-Owned LSL Replacements.

24. Currently, when the City discovers a LSL on both the customer and City portion of the service line, the City will replace the City-owned LSL, advise the customer, and encourage the customer, to replace the customer-owner LSL. Replacing only the City-owned LSL may result in higher lead concentrations in water at that customer's tap for some period of time after such a "partial" LSL replacement occurs.

25. Act 120 prohibits "partial" LSL replacements.³⁴ This prohibition is likely based on the fact that such "partial" replacements can lead to a higher potential for lead exposure through drinking water.³⁵

26. While the City has been proactive in attempting to ascertain the number of LSLs within both the PUC-Jurisdictional Area and within its municipal boundaries, the City does not have records documenting the material used in the construction of each and every service line in its distribution system. By way of example, this includes service lines that were installed by the customer. In furtherance of compiling an inventory of LSLs, the City intends to utilize the following methods/procedures, as more fully set forth in the City's LSLR Plan (**Exhibit B** § 4):

- (a) City records, curb cards and computer or predictive modeling;
- (b) excavation;
- (c) visual inspections; and
- (d) other customer-provided information

³⁴ 52 Pa. Code § 65.62.

³⁵ See Pa. Pub. Util. Comm'n, "PUC Addresses Outstanding Concerns About Lead Service Line Replacement Plans for Pittsburgh Water and Sewer Authority." Published on 2/4/2021. Available at: <https://www.puc.pa.gov/press-release/2021/puc-addresses-outstanding-concerns-about-lead-service-line-replacement-plans-for-pittsburgh-water-and-sewer-authority> (last accessed May 12, 2023).

27. The LSL Rules require a service line inventory that “complies with the [EPA] regulation at 40 CFR 141.1--143.20[.]”³⁶

28. Pursuant to the federal guidance issued on service line inventories, “[w]ater systems with limited or nonexistent records will be more reliant on physical inspection of service line materials, which will require more time and resources than systems with robust records.”³⁷

29. Thus, the EPA has explained that “if water system personnel are already deployed on a street for a main replacement, they may visually inspect system-owned lead status unknown service lines on that street or engage with affected customers to determine the material composition of the service line entering the home.”³⁸

30. The EPA has also endorsed the use of predictive models to assist a water system in conducting a service line inventory, noting that “[w]ater systems may also create a strategy that involves proactive investigation of service line material compositions which is independent of other water system activities, such as the use of predictive models to evaluate the probability a service line is lead and other methods provided or required by the state. Such predictive models could also inform water systems in how they can approach LSLR in a more efficient manner.”³⁹

31. Thus, the methods the City intends to utilize to complete its required service line inventory are consistent with those endorsed by the EPA.

32. As noted above, the City has determined there are at least eighty-five (85) City-owned LSLs in the PUC Jurisdictional Area. Considering this fact, as well as the age of the housing stock in the areas where these LSLs are located, the City assumes that the majority of the

³⁶ 52 Pa. Code § 65.56(a)(1).

³⁷ 86 Fed. Reg. 4212 (Jan. 15, 2021).

³⁸ *Id.*

³⁹ *Id.*

customer properties served by one of these eighty-five (85) LSLs will also have a customer-owned LSL.

B. Ownership and Maintenance After Installation.

33. Under Act 120, the City will replace any customer-owned LSLs discovered contemporaneously with main replacement projects. However, after the City has completed a customer-owned LSL replacement, the responsibility for ownership, maintenance, repair, or replacement of the City-installed replacement of the customer service line will remain with the customer. The tariff revision set forth in **Exhibit A** establishes that a customer will enter into an appropriate agreement with the City to permit the City (through the use of a preapproved, qualified contractors) to replace the COLSL on the customer's property and document the customer's ownership of the replacement customer service line. If a customer declines to enter into such an agreement with the City, the City will replace only the City-owned portion of the LSL and advise the customer of the potential health risks associated with a partial LSL replacement in a communication to the customer and/or property owner. The City will then follow the procedures outlined in its tariff for termination of service to any customer who fails to replace a customer-owned LSL within the prescribed time, consistent with the prohibitions on partial LSL replacements.

C. Estimated Quantities and Costs For Customer-Owned LSL Replacements.

34. Based on its experience with service line replacements, when the City-owned portion of the service line being replaced contains lead, approximately 40% of the customer-owned service lines have been found to also contain lead.

35. Based solely upon the City's incomplete data on LSLs in the PUC Jurisdictional Area and within the City's municipal limits, the City believes there are eighty-five (85) customer-

owned LSLs in the PUC Jurisdictional Area and approximately five hundred fifty (550) customer-owned LSLs within the City of Lancaster limits.

36. Based on the foregoing estimated numbers of LSLs and the resources available to the City, the estimated rate of customer-owned LSL replacements in the PUC Jurisdictional Area would be five (5) per year and the rate of replacement within City limits would be twenty-five (25) per year. As further detailed in the City's LSLR Plan (**Exhibit B**, at Section 8), however, these estimates are extremely preliminary as the City has no information with respect to the customer-owned portions of its system. The City has agreed to cap the total number of customer-owned LSL replacements in a given year to 50 for the PUC Jurisdictional Area.

37. As noted above, the City estimates that the average cost to replace a customer-owned LSL is approximately \$12,000.00. While there are a number of site-specific factors that can impact the cost to replace a customer-owned LSL, this estimate is based upon an average that considers factors such as: contractor cost, excavation depth, length of LSL, restoration costs to restore customer's property, including concrete curb and sidewalk, lawn restoration, and/or street restoration.

38. The City is proposing to establish an annual cap of \$600,000.00 on the costs associated with customer-owned LSL replacements. If the amount included for a given year is not expended, the City proposes to allow those unused portions of the cap to be rolled forward and applied to the cap for the subsequent year, with the understanding and recognition that this carry forward shall not increase the number of customer-owned LSL replacements the City is permitted to conduct for that year.

39. At this time, the City believes the number of annual replacements and the cap on the costs related to those replacements is appropriate in light of the anticipated customer-owned

LSLs that will be encountered on planned main and service replacement projects. The City has done its best in making these determinations to balance all interests, including the associated costs to customers. However, should the City feel that the annual number of replacements or monetary cap should be increased in order to achieve its goals and those of the Commission and other stakeholders of removing customer-owned LSLs, the City may seek approval from the Commission to modify these amounts. Funding for the City's LSLR Plan will come from a mixture of PENNVEST funding and other grants.

40. It is the City's intention to begin replacement of customer-owned LSLs as they are incurred in connection with planned City main and service line replacement projects as soon as the Commission approves its LSLR Program and LSLR plan. The City's planned replacements of the City-owned LSLs were also put on hold as a result of the settlement reached in connection with its DSIC and LTIP filing, which removed those costs from its LTIP for recovery in favor of adding them back into the revised LTIP containing the LSLR plan. The City also would like to avoid potential risks associated with partial LSL replacements that could occur pending resolution of this Petition, thus the request for expedited review.

VI. THE CITY'S LSLR PROGRAM IS IN THE PUBLIC INTEREST

41. There is little doubt that the City's LSLR Program is reasonable and in the public interest.

42. As noted above, federal and Pennsylvania regulations impose an obligation on water systems to provide drinking water that is below the lead action level at the customer's tap regardless of whether the lead originates in the customer-owned or the City-owned portion of the service line.⁴⁰

⁴⁰ See 40 C.F.R. § 141.80(c)(2); 25 Pa. Code § 109.1102(a)(1).

43. This is because lead in drinking water is a recognized health risk and both the federal government and Pennsylvania have required action to minimize and eliminate lead in drinking water.

44. Consistent with accepted practice, the City's LSLR Plan is designed to facilitate complete, rather than "partial" LSL replacements.

45. The City requests approval of its LSLR Program/Plan and corresponding tariff revisions to enable it to replace customer-owned LSLs and to bear the costs of these replacements. This will assist in ensuring that customers who would not otherwise have the financial means to replace a LSL will be able to secure a replacement of their customer-owned LSL and reduce or eliminate lead in their drinking water.

46. The City's proposed LSLR Program/Plan is an expeditious and financially responsible solution to address the recognized health risk posed by lead in drinking water. It is reasonable and in the public interest, and should be approved.

VII. ACCOUNTING AND RATEMAKING TREATMENT FOR CUSTOMER-OWNED LSL REPLACEMENT COSTS

47. Under Act 120, the City will record the original cost of the customer-owned LSL in its), a separate account that is segregated from other service line accounts as required by the applicable LSL regulations. Further, pursuant to Act 120, the City is entitled to recover a return on and a return of its investment in customer-owned LSL replacements in future base rate cases, and between base rate cases, to recover the fixed costs of investments in customer-owned LSLs through the City's existing DSIC.⁴¹

⁴¹ 66 Pa. C.S. § 1311(b)(2)(iii).

VIII. CUSTOMER OUTREACH AND COMMUNICATION

48. The City is a municipality, and not a Class A public utility.

49. The City will comply with those customer outreach, communications, and education requirements set forth in 40 C.F.R. § 141.85, as required by 52 Pa. Code § 65.56(c)(1).

50. Thus, the City will provide notice to those customers it serves with a customer-owned LSL made of lead, galvanized material requiring replacement, or an unknown material with notice in the form set forth in Appendix A of the City's LSLR Plan (**Exhibit B**).

51. The notice will advise of the health risks associated with lead in drinking water and steps that customers can take to reduce exposure to lead in drinking water, and provide information about opportunities to replace LSLs.

IX. WARRANTY INFORMATION

52. Any customer-owned LSL replacement completed by or on behalf of the City must be accompanied by a warranty approved by the Commission as required by Act 120.⁴²

53. The City intends to develop a list of preapproved, qualified contractors who will conduct customer-owned LSL replacements on the City's behalf.

54. When customer-owned LSL replacements are performed by the City's preapproved, qualified contractors, the City will require the contractor to provide a two (2) year warranty on workmanship, materials, and restoration of surfaces. The customer, as the owner of the new service line, will be the beneficiary of the warranty, which will fully comply with the LSL Rules.

⁴² *Id.* at § 1311(b)(2)(vii)(A).

X. REIMBURSEMENT FOR CUSTOMERS WHO REPLACED THEIR CUSTOMER-OWNED LSL PRIOR TO ADOPTION OF THE CITY'S LSLR PROGRAM

55. Act 120 requires the City's LSLR Plan to provide reimbursement to any customer who replaced that customer-owned LSL at their own expense within one year of commencement of a project in accordance with a Commission-approved tariff.⁴³

56. The City's reimbursement program will include the following terms and conditions:

- The customer or property owner must provide the City with an opportunity to inspect the customer's installation. The property owner or customer must provide the City notice a minimum of 72 hours' notice of the installation time.
- The property owner or customer reimburses the City for the cost of the inspector. Current inspection costs are \$89 per hour and will increase annually. The time for inspection is anticipated to be less than four (4) hours.
- The property owner or customer presents the City with the bill for reimbursement within 30 days of the installation's completion.
- The property owner or customer will be reimbursed using a City issued check for up to 100% of the cost of a similarly sized service line, with similar attributes of replacement at the property in the City's sole discretion. The City will determine the average cost of the installation using one of its pre-approved contractors to estimate the replacement cost.
- The City will issue the reimbursement via check.
- The City will issue the reimbursement check for eligible applications no later than one hundred eighty (180) days from receipt of the eligible application.

⁴³ *Id.* at § 1311(b)(2)(vii)(B).

XI. NOTICES

57. The name, address, and contact information of the City's counsel for this matter are:

Courtney L. Schultz, Esq.
Shane P. Simon, Esq.
Saul Ewing LLP
1500 Market Street
Centre Square West, 38th Floor
Philadelphia, PA 19102
Tel: 215-972-7717
courtney.schultz@saul.com
shane.simon@saul.com

All pleadings, orders, notices, correspondence and other documentation with respect to this matter should be directed to the above counsel.

58. Notice of this Petition has been provided to the individuals and entities as required by Section 65.54(a) of the LSL Rules, as reflected on the Certificate of Service provided herewith.

WHEREFORE, the City respectfully requests that the Commission find and conclude that its Petition be GRANTED and enter an ORDER:

1. Approving the City's proposed tariff changes as set forth in **Exhibit A**, and authorizing the City to file the tariff supplement in **Exhibit A** on one-days' notice;
2. Approve the City's LSLR Program;
3. Approve the City's LSLR Plan, as set forth in proposed Section 8 to its revised LTIP pending approval in Docket No. R-2022-, which is attached to this Petition as **Exhibit B**;
4. Approve the City's proposal to record the costs of the customer-owned LSL replacements in a separate, segregated subaccount and to recover a return on and a return of its investment in the replacement of customer-owned LSLs, pursuant to 66 Pa. C.S.A. § 1311(b)(2)(iii); and

5. Direct the Commission's Bureau of Technical Utility Services to complete its review of the LTIP filed in this docket, and included as **Exhibit B** to this Petition, and submit an Order for Commission consideration.

Respectfully submitted,

/s/ Courtney L. Schultz

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Attorneys for Petitioner

Dated: May 31, 2023

EXHIBIT A

Supplement No. 498
to
Tariff Water - Pa. P.U.C. No. 6

CITY OF LANCASTER
RATES, RULES AND REGULATIONS
GOVERNING THE DISTRIBUTION OF WATER
IN
TERRITORY OUTSIDE THE CITY OF LANCASTER
INCLUDING AREAS IN THE BOROUGH OF MILLERSVILLE AND
THE TOWNSHIPS OF
EAST HEMPFIELD, EAST LAMPETER, LANCASTER, MANHEIM,
MANOR, PEQUEA, WEST HEMPFIELD, AND WEST LAMPETER
IN LANCASTER COUNTY, PENNSYLVANIA

NOTICE

ISSUED: June 24, 2023
~~2023~~

EFFECTIVE: June 29,

By: Patrick Hopkins
Business Administrator
Lancaster Pennsylvania

This Tariff ~~increases rates for all customers~~ Supplement concerns replacement of Customer Owned Lead Service Lines

CITY OF LANCASTER
Tariff
Lancaster, Pennsylvania
2
No. 2

Supplement No. 498 to
Water - Pa. P.U.C. No. 6
332nd Revised Page No.
Cancelling 324nd Revised Page

List of Changes Made by this Tariff

This Supplement concerns the City of Lancaster's replacement of Customer Owned Lead Service Lines (increases jurisdictional rates by \$2,499,883 or 13.2% over existing rates. Both customer charges and volumetric rates are increased for all customer classes.

~~This Supplement eliminates a charge for a 1 1/4 inch meter as no customers exist under this rate.~~

~~This Supplement creates a separate charge for customers with a 3/4 inch meter — one (3/4 inch) for customers whose service line is 3/4 inch or less and another (3/4 x 1 inch) for customers whose service line is 1 inch. ("COLSLs") on tariff page 13, as approved by the Pennsylvania Public Utility Commission at Docket No. P-2023-_____ . Please refer to pages 3 and 13.~~

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ISSUED: June 24, 2023

EFFECTIVE: June 29, 2023

CITY OF LANCASTER
Tariff
Lancaster, Pennsylvania

3

3

Supplement No. ~~498~~ to

Water - Pa. P.U.C. No. 6
~~332nd~~ Revised Page No.

Cancelling ~~324nd~~ Revised Page No.

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ISSUED: June 24, 2023

EFFECTIVE: June 29, 2023

Schedule of Rates
Meter Rate - General Service

Application

This Schedule applies to all service other than (1) emergency sales for resale and (2) fire protection (See Section 3).

Customer Charges

All metered customers shall be subject to a monthly or quarterly customer charge, based on the required size of meter to render adequate service.

Size of Meter	Customer Charge		Size of Meter	Customer Charge	
	Per Month	Per Quarter		Per Month	Per Quarter
5/8"	\$7.95	\$23.85	3"	\$102.40	\$307.20
3/4"	\$9.30	\$27.90	4"	\$159.90	\$479.70
3/4 x 1"	\$16.70	\$50.10	6"	\$318.00	\$954.00
1"	\$21.10	\$63.60	8"	\$503.60	\$1,510.80
1-1/2"	\$33.20	\$99.60	10"	\$666.20	\$1,998.60
2"	\$51.90	\$155.70	12"	\$1,004.55	\$3,013.64

Consumption Charges — Residential, Commercial and Industrial

In addition to the customer charge the following water consumption charges will apply:

	<u>Rate Per 1,000 Gallons</u>
For the first 25,000 gallons/month or 75,000 gallons/quarter	\$4.796
For the next 575,000 gallons/month or 1,725,000 gallons/quarter	\$3.949
For all over 600,000 gallons/month or 1,800,000 gallons/quarter	\$3.710
Consumption Charge — Large Industrial for all consumption	\$3.568

The minimum charge shall be the customer charge.

When more than one meter is installed on the premises for the convenience of the customer, the above consumption and customer charges will be assessed against the individual meters.

Schedule of Rates

Meter Rate - Water Sold for Resale Purposes

Application

This Schedule is applicable to all metered sales to public utilities and municipal corporations for resale purposes.

Customer Charges

<u>Size of Meter</u>	<u>Minimum Charge Per Month</u>	<u>Minimum Charge Per Quarter</u>
4"	\$159.90	\$479.70
6"	\$318.00	\$954.00
8"	\$503.60	\$1,510.80
10"	\$666.20	\$1,998.60

Consumption Charges

In addition to the customer charge the following water consumption charges will apply:

Rate Per 1,000 Gallons

For all consumption \$3.758

The minimum charge shall be the customer charge.

When more than one meter is installed on the premises for the convenience of the customer, the above consumption and customer charges will be assessed against the individual meters.

(C)

Schedule of Rates

Tapping Fee

Application

This Schedule is applicable to all new connections to the company's system in West Lampeter Township,

Capacity Portion:

\$850.00 per residential connection*

Special Purpose Part:

\$1,150.00 per residential connection*

Total Tapping Fee:

\$2,000.00 per residential connection*

* A single family dwelling, mobile home, apartment unit, condominium and the like shall be considered one residential connection. Connections for nonresidential structures will be calculated on an equivalent basis for a residential connection as determined by the City's consulting engineers at the time application for service is made. Each unit of a multi-occupancy building shall be at least one residential unit. All non-residential connections will be subject to audit after they are in use. If actual usage exceeds the amount originally applied for as determined by the City's consulting engineers, the owner shall be invoiced for the additional tapping fee.

(C) Indicates Change

ISSUED: September 7, 2001

EFFECTIVE: September 8, 2001

Schedule of Rates

Flat Rate — Private Fire Protection Service

Application

This Schedule is applicable to all private fire lines serving yard hydrants and automatic sprinkler or fire service systems located inside buildings, if (1) adequate provision is made to prevent the use of water from such service connections for purposes other than fire extinguishing and (2) a detector check, of a type approved by the Bureau of Water, is installed on the customer's fire service line, said detector check to be purchased and installed at the customer's expense.

Rate:

	<u>Per Month</u>	<u>Per Quarter</u>
1" Connection	\$ 3.23	\$ 9.69
1½" Connection	7.27	21.81
2" Connection	12.92	38.76
3" Connection	29.06	87.18
4" Connection	42.34	127.02
6" Connection	68.90	206.70
8" Connection	119.15	357.45
10" Connection	159.91	479.73
12" Connection	231.01	693.03

No charge will be made for water used for extinguishment of accidental fires. All consumption recorded by the disc (small flow) meter, whether from use of water for other purposes, or from leakage from customer-owned pipelines, will be billed at the meter rate for General Service.

RULES AND REGULATIONS

Sec. 1 - Definition of Terms

- Applicant: An individual or agency applying for water service.
- Bureau of Water: The Bureau of Water of the City of Lancaster
(or Utility)
- Commission: Pennsylvania Public Utility Commission.
- Customer: The individual or agency contracting for a supply of water to a property as hereinafter classified, i. e.,
- (a) A building under one roof and occupied as one residence or business; or
 - (b) A combination of buildings in one enclosure and occupied by one family or business; or
 - (c) One side of a double house having a solid vertical partition wall and occupied by one family or business; or
 - (d) One side or part of a house occupied by more than one family or business, even though the closet and other fixtures be used in common; or
 - (e) Each apartment, office, or suite of offices located in a building having several such apartments, offices, or suites of offices and using in common one hall and one or more means of entrance.
- Date of Presentation: The date upon which a bill or notice is mailed, as evidenced by postmark, or delivered personally to the customer.
- Domestic Service: Provision of water for household residential purposes, including water for sprinkling lawns, gardens, and shrubbery; Watering livestock; washing vehicles; and other similar and customary purposes.
- Fire Protection Service: Provision of water for public and private fire protection.
- Flat Rate Service: Provision of water in unmeasured quantities.
- Flat Rate: A fixed periodic charge for an unmetered service.

RULES AND REGULATIONS

Sec. I - Definition of Terms, cont.

Commercial Service:	Provision of water to premises where the customer is engaged in trade.
Industrial Service:	Provision of water to a customer for use in manufacturing or processing activities.
Large Industrial Service:	Provision of water to a customer for use in manufacturing or processing activities and consumes during the prior calendar year, an average usage exceeding 10,000,000 gallons per month. (C)
Irrigation Service:	Provision of water for commercial agricultural, floricultural, or horticultural use.
Main Extension:	Extension of distribution pipelines, exclusive of service connections, beyond existing facilities.
Mains:	Distribution pipelines located in streets, highways, public ways, alleys, or private rights of way which are used to carry water to serve the general public.
Meter Rate Service:	Provision of water in measured quantities.
Municipal or Public Use:	Provision of water to a municipality or other public body for other than fire protection purposes.
Premises:	The integral property of area, including improvements thereon, to which water service is or will be provided.
Service Line, Utility's:	The connecting facilities between the utility's distribution main and the customer's service line, in general consisting of a valve or corporation stop at the main, piping there from to the street curb line, terminating with a curb stop and curb box.
Service Line, Customer's:	The connecting facilities from the utility's curb stop and curb box to a point of consumption.
Tariff Schedules:	The entire body of effective rates, charges, rules, and regulations, as set forth herein.
Temporary Service:	Provision of service for circuses, bazaars, fairs, construction work, irrigation of vacant property, and similar uses, that because of their nature will not be used steadily or permanently.

(C) Indicates Change

ISSUED: March 4, 2015

EFFECTIVE: March 5, 2015

RULES AND REGULATIONS

Sec. 2 - Service Area

The service area of the Bureau of Water of the City of Lancaster outside of or beyond the city limits of the City of Lancaster includes areas in the following townships and borough in Lancaster County:

East Hempfield Township
East Lampeter Township
Lancaster Township
Manheim Township
Manor Township
Pequea Township
West Hempfield Township
West Lampeter Township
Borough of Millersville

Sec. 3 - Description of Service

A. Supply

The Bureau of Water will exercise reasonable diligence and care to deliver a continuous and sufficient supply of water to the customer at a proper pressure, and to avoid any shortage or interruption in delivery.

B. Quality

The Bureau of Water will endeavor to supply a safe and potable water at all times.

C. Classes of Service

Services installed by the Bureau of Water will be classified as follows:

RULES AND REGULATIONS

Sec. 3 - Description of Service, cont.

C. Classes of Service, cont.

1. Residential
2. Commercial
3. Industrial
4. Irrigation (Commercial)
5. Municipal (Excluding Fire Protection)
6. Private Fire Protection
7. Public Fire Protection
8. Other Utilities for Resale Purposes (Emergency Use Only)
9. Temporary

Metered service only is available, except service for public and private fire protection service.

Sec. 4 - Service Connections

A. Application for Service Connection

4.1 Any property owner desiring the introduction of a service line from the utility's main to the curb of his or her premises must first make written application on a form furnished by the Bureau of Water. The application must be signed by the property owner or his duly authorized attorney.

B. Utility's Service Lines

4.2 The Bureau of Water will, at its own expense, furnish and install a service of such size and at such location as the applicant requests, provided such request is reasonable. The utility's service lines will be maintained at its own expense as an integral part of its distribution system and they will be the property of the utility and under its exclusive control.

4.3 Where the customer requests a service line larger than that deemed necessary by the utility, the utility will install the larger service, provided the customer pays the additional cost for the larger service.

4.4 Any temporary or emergency feature of a service line requested by the customer shall be at the expense of the customer. If the owner of a parcel of ground desires a service line installed to the curb in advance of street Improvement and where there is no present demand for a supply of water, such owner shall

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

B. Utility's Service Lines, cont.

pay the cost of installing the service line, which cost shall be refunded if and when an application is made and approved for a supply of water through the service line.

4.5 Where more than one customer is now supplied through one service line, a violation of these Rules and Regulations by any customer on the common service line shall be deemed a violation by all such customers, but water service to the premises shall not be discontinued until after the expiration of a reasonable time for the installation of a separate customer's service line by or for each customer after notice by the utility to all such customers of the violation of the Rules and Regulations. The utility will install a sufficient number of separate curb stops and curb boxes at the termination of the utility's service line to permit the installation of a separate customer's service line for each customer, or the utility may, at its election, permit the use of one customer's service line by all such customers other than the customer who shall have violated these Rules and Regulations.

4.6 No service line of the utility will be installed at a time when street openings are prohibited by municipal regulations or, in the judgment of the utility, working conditions are unreasonable for such installations.

4.7 No service pipe shall be placed within eighteen inches of any sewer line or in the same trench with a gas pipe or other facilities of a public service company, or within three feet of any open vault or area, or pass through any premises other than the one supplied, nor shall it be laid at a depth of less than 3 1/2 feet below the surface of the ground, or less than 3 1/2 feet below the street grade, where one has been established by public authority, except when otherwise approved by the proper official of the Bureau of Water.

4.8 No service line will be installed by the utility on private property unless the owner furnishes a right of way satisfactory to the utility.

4.9 When new service lines are installed, or old ones replaced, the stop and curb box will be placed inside the curb and within six inches of the same,

4.10 If a customer being supplied by an existing service line desires that its location be changed to suit his own convenience, such customer shall pay all costs of making the change, including all labor, materials, and permits,

4.11 Under no circumstances shall any person not authorized by the utility turn the curb stop cock on or off.

RULES AND REGULATIONS

Sec. 4 - Service Connections, cont.

B. Utility's Service Lines, cont.

4.12 Hereafter only one customer will be supplied through one service pipe. Where more than one customer is now supplied through one service pipe under the control of one curb cock, it shall be replaced by separate curb stops and curb boxes for each customer in accordance with Rule 4.5, at the convenience of the utility. All service lines will be the same size as the curb stop up to the water meter. The curb stop shall be six (6) inches behind curbs or pavement edges. If the curb box is in a driveway, the box must be a two (2) inch box. The curb box must be aligned with the shut-off valve, plumb, backfilled and tamped in place, and be at grade after any landscaping. The curb box must be straight and centered on the shut off valve before the City will take ownership of the valve. (C)

4.13 Where renewal of a service line of the utility is found to be necessary, the utility will renew said service line in the same location as the old one. However, if the customer, for his own convenience, desires the utility's service line at some other location and agrees to pay all expenses of such relocation in excess of the cost of installing the new service line in the same location as the old and cutting off and disconnecting the old service line, the utility will lay the new service line at the location desired. Should the customer, for his convenience, request that the service be renewed using larger size materials than deemed necessary by the utility, the utility will renew the service using the larger size materials, provided the customer pays the additional cost.

4.14 The utility is not responsible for the installation and/or maintenance of the customers water lines beyond the end of the utility's service line, except as set forth in Section 4.19, below.

C. Customer's Service Line

4.15 Each customers service line shall be installed and maintained by or on behalf of such customer at his own expense. A customer's service, line shall be of a material and at a location approved by the utility. 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 Premises of the Customer shall be protected properly by the Customer. All leaks or other deteriorated conditions of the Customer's service line or any other pipe or fixture in or upon the Premises must be repaired immediately by the owner or occupant of the Premises. (C)

4.166 The customer's service line shall not: (a) occupy the same trench with, or be placed within eighteen inches of any sewer pipe of any facility of any other public service company, except that a common trench may be ledged for the service if approved by the utility; or (b) be placed within three feet of any open excavation or vault; or (c) pass through any premises other than those served by such customer's service line.

4.177 There shall be placed in the service line, inside the wall of the building supplied, at the expense of the customer, a roundway brass stop and waste cock, easily accessible to the occupants for their protection in enabling them to turn off the water in case of leaks, and to drain the pipe to prevent freezing.

4.188 Where any service line is directly connected to a heating unit (water heater, steam boiler, etc.) a check valve and a relief valve shall be inserted in the line between the utility's meter and said heating unit at the maximum distance possible from the utility's meter.

4.19 Notwithstanding Sections 4.15 – 4.18, above, the utility shall, provided the customer provides consent, replace lead Customer Owned Service Lines (“COLSLs”) pursuant to the utility’s Lead Service Line Replacement Plan (“Replacement Plan”). Pursuant to its Replacement Plan, the utility will replace COLSLs it encounters when replacing its mains, up to fifty (50) COLSL replacements per year within a maximum budgeted amount of 600,000 per year. Any portion of the annual budgetary allotment of \$600,000 that is not spent on COLSL replacements in that year will roll over to the next subsequent year, subject to annual cap of fifty (50) COLSL replacements per year. If the utility does not use the excess budgeted amount that carried over from the previous year, that excess budgeted amount will not carry forward into the following year. The utility may petition the Commission to modify its annual budgeted amount and/or the cap on COLSL replacements per year if, in the utility’s sole discretion, the utility determines these amounts are not adequate to meet the needs of the Replacement Plan. Any petition to modify the budgeted amount or maximum number of COLSLs replaced per year is subject to Commission approval. Costs incurred by the utility under the Replacement Plan shall be subject to Act 120 of 2018 (P.L. 738, No. 120) and the accounting and ratemaking treatment approved by the Pennsylvania Public Utility Commission entered [date] at Docket No. P-2023-[]. After a COLSL is replaced by the utility or the utility’s contractor, the Customer shall own and have full responsibility for the repair, replacement, and maintenance of the new Customer Service Line installed, and which, thereafter, Rules 4.15 – 4.18 shall apply:

a. The Customer shall enter into an Agreement for the Replacement of the COLSL, in a form provided by the utility prior to the initiation of any work by the utility or its contractors to replace a COLSL. The utility shall provide a two-year warranty on workmanship, materials, and replacement of surface cover for any COLSL that the utility or its contractor replaces. The maximum coverage under the warranty shall be the average amount required to replace a COLSL. The liability of the utility and/or its contractor shall be limited only to those costs necessary to reasonably replace the COLSL and restore the affected portion of the Customer’s property to approximately the same condition it was in prior to commencement of the COLSL replacement.

b. If the utility, at the request of a Customer or property owner (as applicable), determines that the Customer or property owner (as applicable) replaced their COLSL, and the Customer Service Line was replaced within one year prior to the commencement of the main replacement project, The City is provided an opportunity to inspect the customer’s installation. The property owner or customer must provide the City notice a minimum of 72 hours’ notice of the installation time. The property owner or customer reimburses the City for the cost of the inspector. Current inspection costs are \$89 per hour and will increase annually. The time for inspection is anticipated to be less than four (4) hours. The property owner or customer presents the City with the bill for reimbursement within 30 days of the installation’s completion. The property owner or customer will be reimbursed using a City issued check for up to 100% of the cost of a similarly sized service line, with similar attributes of replacement at the property in the City’s sole discretion. The City will determine the average cost of the installation using one of its pre-approved contractors to estimate the replacement cost. The City will issue the reimbursement via

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CITY OF LANCASTER
Tariff
Lancaster, Pennsylvania

13

No. 13

check for eligible applications no later than one hundred eighty (180) days from receipt of the eligible application. (C)

(C) Indicates Change

Supplement No. ~~498~~ to

Water – Pa. P.U.C. No. 6
~~32nd~~ Revised Page No.

—Cancelling ~~24nd~~ Revised Page

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ISSUED: ~~June 24, 2022~~

EFFECTIVE: ~~June 29, 2022~~

RULES AND REGULATIONS

Sec. 5 – Application for Service

A. Application

5.1 Each applicant for water service will be required to sign a form provided by the utility, and an agreement to abide by all the rules and regulations of the utility.

The applicant shall provide the following:

1. Owner or builder name, phone number, and email address;
2. New service address and the date on which the applicant will be ready for service;
3. Whether the premises have ever before been supplied by the utility;
4. The purpose for which the service is to be used;
5. Lot number;
6. The size of the service;
7. The address to which bills are to be mailed or delivered;
8. Whether the application is the owner or tenant of, or agent for, the premises;
9. Plumber's name, phone number, and email address;
10. Applicable plumbing permit if required by the municipality where service is requested;
11. Acknowledgment of the applicable rate schedule. (C)

The application is merely a written request for service and does not bind the applicant to take service for any period of time longer than the one upon which the rates and minimum charges of the applicable rate schedule are based; neither does it bind the utility to give service, except under reasonable conditions.

5.2 Developers shall also complete a service installation form and a water application form for all lots in the development prior to any construction. The developer will provide the following:

1. A copy of the development plans, showing the lot number, address, and Lancaster County Real Estate tax map;
2. Lot numbers painted on the curb;
3. A W = water; painted or stamped on the concrete where the service is requested.

The developer will be responsible for curb boxes until the utility has made final inspection. Only one water lateral will be permitted for each proposed lot. (C)

5.3 Commercial and Industrial applicants shall also provide:

1. Prints showing tap of the main and location of the meter;
2. Completion of New Service Backflow Prevention Form, before construction;
3. Provide a capacity request letter in gallons per day;
4. Obtain utility approval before bidding to construct the new service;
5. Provide copy of any municipal required street excavation permit if the street must be disturbed. (C)

B. Change in Customer's Equipment

Customers making any material change in the size, character, or extent of the equipment or operations utilizing water service, or whose change in operations results in a large increase in the use of water, shall immediately give the utility written notice of the nature of the change and, if necessary, amend their application.

C. Change of Ownership of Property

Where customer is owner of premises supplied with water service, he should immediately notify the Bureau of Water, if and when the property is sold, and the new owner or tenant should sign an application for water service, so that bills for water service will be properly addressed.

(C) - Indicates Change.

RULES AND REGULATIONS

Sec. 6 - Special Contracts

Contracts, other than applications, may be required prior to service, under the following conditions:

1. When construction of special extension facilities is necessary.
2. For temporary service. (See Sec. 13.)
3. For tire protection service.
4. For connections with other qualified utilities for emergency service.

Sec. 7 - Meters

A. Ownership and Protection of Meter

7.1 All meters will be furnished and maintained, as far as ordinary wear is concerned, by the utility, and remain the property of the utility, and be accessible to and subject to its control. A gate valve shall be placed on the service line on the street side of and near the meter (Rule 4.17), and a suitable check valve and a relief valve shall be inserted in the line between the utility's meter and any heating unit directly connected to the service line (Rule 4.18); all to be placed by and remain the property of the customer.

7.2 The customer shall be responsible to the utility at all times for proper protection of the meter from injury or loss of the meter arising out of or caused by customer's negligence or carelessness, or that of his servants, agents, employees, or any person upon his premises, under, or by authority of, his consent, or sufferance. The customer shall permit no one who is not an agent of the utility or otherwise lawfully authorized so to do, to remove, inspect, or tamper with the utility's meter or other property of the utility on his premises. The customer is also responsible for all equipment that is used to monitor water consumption. If the meter is lost, broken, lighting damaged, frozen and breaks, or any part of the assembly (meter, wire, and outside pad) is damaged by the customer, the customer shall be responsible for the cost to replace the meter and/or damaged assembly parts. (C)

7.3 If a range boiler, or heating boiler, is directly connected to the pipelines, the utility will install an approved type of positive action relief valve on the outlet side of the meter to protect the meter from hot water, at the expense of the customer.

(C) Indicates Change

RULES AND REGULATIONS

Sec. 7 - Meters, cont.

B. Size and Location of Meter (C)

7.4 The utility will determine the size and location for the meter. The meter shall be placed at a convenient, accessible location, in a horizontal position, approved by the utility so as to control the entire supply. Meters shall not be higher than 4 feet from the floor. Water lines shall not run under the floor to the meter. A valve will be installed in front of and after the meter. A flared or compression fitting must be used at the first valve before the meter. Copper pipe shall be used up to the valve.

The ERT (encoder-receiver-transmitter) for the meter must be mounted on the wall no lower than 3 feet, at a location approved by the utility. If the customer fails to install the ERT and/or wire at the location required, the service line will be shut off until all requirements have been complied with.

For ERT pit installations, complete any necessary drilling to hook up the antenna for the meter before the meter installation. Pits in a wooded area require pressure treated posts with half plastic piping to cover the wire from the pit to the post. Pits that are on a hill require the post to be mounted at the bottom of the hill, and in an area that allow the utility reader access to get to the ERT. If the utility decides the meter is to be placed within the building to be served, the customer shall provide free of charge and expense to the utility an easily accessible place near the entrance of the service pipe. If the utility decides the meter is to be located outside the building to be served, it must be placed in an approved meter box furnished by the utility at the expense of the customer. (C)

7.5 Meters moved for the convenience of the customer will be relocated at the customer's expense. If the service line from the curb box to the location of the water meter exceeds 100 feet, a meter pit is required. The pit shall be located within 15 feet of the property line. Note that the utility engineer will review the meter pit. A backflow prevention device will be required in accordance with the Backflow Prevention and Cross Connection Control Policies and Procedures Manual (See Section 14.2 of the tariff). (C)

C. Periodic Meter Tests

7.6 All meters shall be tested periodically by the utility without cost to the customer, and the customer may have the meter tested at any other time by making a written application to the Bureau of Water and providing a deposit, as indicated in Rule 7.8, to defray the cost of the special test.

D. Meter Testing in Disputed Account

7.7 In case of a disputed account, involving the accuracy of a meter, such meter shall be tested upon the request of the applicant, in conformity with the provisions of the rules and regulations pertaining to Water Service Utilities, of the Public Utility Commission.

7.8 The meter will be tested upon the written request of the Customer and refund made if a meter is found to be fast at any test in accordance with the Rules set forth in the Water Regulations of the Pennsylvania Public Utility Commission. The Customer shall pay a deposit in advance for testing of the meter in accordance with fees established by the Commission in 52 Pa. Code §65.8(h). If the meter tested upon such request shall be found to be accurate within the limits specified by the Commission, the fee shall be retained by the City; but if not so found, then the cost thereof shall be borne by the City and the fee deposited by the Customer shall be refunded.

(C) Indicates Change

RULES AND REGULATIONS

Sec. 7 - Meters, cont.

D. Meter Testing in Disputed Account, cont.

7.9 Rates for testing meters not included in the above classification, or which are so located that the cost is out of proportion to the fee specified, will be furnished by the Commission.

E. Adjustment of Account for Faulty Registration

7.10 If a meter be found to be in error at any test by more than four (4) percent, an allowance or charge shall be made to the customer by the utility, equal to the excess or deficiency in quantity charged the customer, figured back from the date of test through the entire period of the current bill, unless it can be shown that the error is due to an accident or other cause, the exact date of which can be determined, in which case it shall be figured back to such date.

F. Meter Repairs

7.11 When a meter has been found to be in error more than four (4) percent, it will be repaired or replaced with a meter accurate within four (4) percent by the utility without charge to the customer.

G. When Meter Does Not Register

7.12 If a meter, by reason of any defect, has not registered for one month or any part of a quarter year, then the bill for that period shall be estimated on the basis of the average consumption during the three preceding periods. The customer shall at once notify the utility of any cessation of the registration of the meter. Every meter is installed subject to a minimum monthly or quarterly charge in accordance with the Schedule of Rates and such minimum charge shall be non-abatable for nonuse of water, and noncumulative, against subsequent consumption.

RULES AND REGULATIONS

See. 8 - Discontinuance of Service

A. Customer's Request for Service Discontinuance

8.1 When premises are unoccupied, the customer shall notify the utility in writing and the water will be turned off and all charges for water will cease from the date that the water is turned off by the utility. When the property is again occupied, the customer shall again notify the utility in writing and the water will be turned on. No allowance or refund will be made for unoccupied property when written notice both at time of vacancy and at time of occupancy has not been given as above provided, No refund will be allowed for property unoccupied for a *less* period of time than one month.

B. Discontinuance of Service for Failure to Obey Rules

8.2 Service may be discontinued by the utility after due notice to customer for any one of the following reasons:

- (a) Use of water by a customer, or with his consent, for any purpose or at any location or property other than those or that described in the application;
- (b) Failure of a customer to maintain and repair his portion of service line;
- (c) Undue waste of water by a customer or with his consent;
- (d) Failure of a customer to pay a bill for water service within the period herein specified or failure to pay any other fee or charge herein provided;
- (e) Violation by a customer, or with his consent, of any of these Rules and Regulations.

8.3 If the utility has reason to suspect that any customer has tampered with the curb cock after the water has been turned off from the premises, the utility may shut off the water at the main, and it will not be again turned on until satisfactory assurance is given that the practice will be discontinued and all bills, including labor, supplies, and permits, incurred in shutting off and turning on the water are paid in full.

C. Restoration—Reconnection Charge

8.4 A charge of eighty-three dollars (\$83.00) payable in advance will be made for turning on water in restoration of service after discontinuance for any of the reasons specified in Rule 8.2.

(C)(D)

(D) Indicates Decrease

(C) Indicates Change

RULES AND REGULATIONS

Sec. 9 - Deposits

9.1 If the utility requires a deposit pursuant to the Rules and Regulations contained in this tariff or the Water Regulations of the Pennsylvania Public Utility Commission, deposits will be handled in accordance with any applicable Commission regulations and the Public Utility Code. (C)

(C) **Indicates Change**

RULES AND REGULATIONS

Sec. 10 - Notices

A. Notices to Customers

10.1 Notices from the utility to a customer will normally be given in writing, and either delivered or mailed to him at his last known address.

10.2 Where conditions warrant, and in emergencies, the utility may resort to notification either by telephone or messenger.

B. Notices from Customers

10.3 Notice from the customer to the utility may be given by him or his authorized representative orally or in writing:

- (a) At the office of the Bureau of Water in City Hall; or
- (b) To an employee of the utility.

RULES AND REGULATIONS

Sec. 12 - Bills Due and Payment

12.1 Meters will be read at regular monthly or quarterly intervals, at the option of the utility, for the preparation of regular bills, and as required for the preparation of opening bills, closing bills, and special bills.

12.2 All bills for unmetered service shall be rendered quarterly in arrears.

12.3 The customer will be responsible for the payment for all service rendered by the utility until written notice to discontinue same is received and reasonable time from receipt of said notice shall have elapsed for the utility to take the final reading of the meter.

12.4 If any monthly or quarterly bill for water service is not paid within thirty (30) days after the date on which the bill is rendered, a penalty of one and one-quarter percent (1-1/4%) of the amount of said bill shall be imposed thereon, and further, the water shall be shut off after giving the customer ten (10) days written notice of the utility's intention to do so. Upon payment by the customer of an additional charge of eighty-three dollars (\$83.00) as the charge for restoring service, the customer will be returned to service.

(D)(C)

12.5 Payments mailed, as evidenced by the United States Post Office mark, on or previous to the last day of the period in which the payment becomes due will be deemed by the utility to be a payment of the bill within the period in which it becomes due.

12.6 Bills or notices, relating to the utility or its business, shall be mailed or delivered to the customer's last address as shown by the books of the utility and the utility shall not be otherwise responsible for delivery. The utility shall deliver or mail all such notices and bills to the address given on the application, until a change, in writing, has been filed with the utility by the applicant. Failure to receive a bill shall not exempt any customer from the payment of the bill or from being subject to the above provisions with regard to discontinuance of service. The presentation of a bill to the customer is a matter of accommodation and not a waiver of this rule.

(D) Indicates Decrease

(C) Indicates Change

RULES AND REGULATIONS

Sec. 13 - Temporary Service

A. Charge for Water Service

13.1 Charges for water furnished through a temporary service connection shall be at the established rates for other customers.

B. Installation Charge and Deposits

13.2 The applicant for temporary service will be required:

- (a) To pay the utility, in advance, the estimated cost of installing and removing all facilities necessary to furnish such service.
- (b) To deposit an amount sufficient to cover bills for water during the entire period such service may be used, or to otherwise establish his credit.
- (c) To deposit with the utility an amount equal to the value of any equipment loaned by the utility to such applicant for use on temporary services.

C. Responsibility for Meters and Installation

13.3 The customer shall use all possible care to prevent damage to the meter or to any other loaned facilities of the utility which are involved in furnishing the temporary service from the time they are installed until they are removed, or until 48 hours' notice in writing has been given to the utility that the contractor or other person is through with the meter or meters and the installation. If the meter or other facilities are damaged, the cost of making repairs shall be paid by the customer..

D. Temporary Service from a Fire Hydrant/Construction Water

13.4 Water for construction purposes may be furnished by a metered service line from the main or by a utility issued permit to use a fire hydrant with a utility issued isolation device and billing meter. Fire hydrant connections are only available at the locations outlined in Section 13.5. There shall be no hook-ups at the curb stop. A permit fee may be required for the utility issued isolation device with billing meter. If temporary service is supplied through a fire hydrant, a permit for the use of the hydrant shall be obtained from the municipality and the utility. It is specifically prohibited to operate the valve of any fire hydrant other than by the use of a spanner wrench designed for this purpose. (C)

E. Non-Potable Bulk Water Loading Stations (C)

13.5 PADEP required that the utility permit all locations where water is withdrawn from hydrants connected to the utility's distribution system. The Customer must contact the utility to arrange for a permit and a utility issued isolation device and billing meter before water may be withdrawn at any of the PADEP approved locations listed below:

Conestoga Water Treatment Plant, 150 Pitney Road, Lancaster, PA
Susquehanna Water Treatment Plant, 900 South Fifteenth Street, Columbia, PA
WH-14459 2250 Old Philadelphia Pike, Rear East Lampeter Township Building
WH-14460 2056 Waterford Drive
WH-12369 506 Ashton Place
WH-11161 642 Fountain Avenue
WH-12606 5 Bentley Lane
WH-14778 55 Cartledge Lane
WH-12460 140 South Tree Drive
WH-17766 400 Block of East Fulton Street North Side
WH-11735 451 College Avenue
WH-10385 Green Street at South Duke Street
WH-10848 347 North Reservoir Street
WH-10580 Ruby Street at 6th Street
WH-11822 304 South Broad Street
WH-10254 North Queen Street at Penn Square
WH-10621 Fairview Avenue at Fremont Street
WH-11786 750 West Chestnut Street
WH-11153 756 Hamilton Street
WH-10684 861 Marjory Terrace

The utility reserves the right to update this list as may be necessary at the direction of the PADEP, without the approval of the Commission, upon the filing of a revised tariff leaf with the Commission. (C)

F. Unauthorized Use

13.6 Tampering with any fire hydrant for the unauthorized use of water therefrom, or for any other purpose, is a criminal offense, punishable by law. (C)

(C) **Indicates Change**

RULES AND REGULATIONS

Sec. 14 - Cross Connections

14.1 Water service not supplied by the utility shall not be connected or cross-connected with the utility's facilities.

14.2 Backflow Prevention and Cross Connection Control -The utility recognizes that certain water customers have water systems that have connections to apparatus, vessels, etc., which may have impurities in varying degrees that, if not properly isolated and contained, could contaminate and/or pollute both the customer's water system and the utility's water distribution system. The utility has developed a Backflow Prevention and Cross Connection Control Policies and Procedures Manual, which manual is incorporated herein by reference, as updated from time to time and is available on the City's website. This Manual defines the policy and procedures of the City of Lancaster and the water Customer's responsibility regarding backflow prevention and cross-connection.

(C)

14.3 All Commercial, Industrial, and Bulk water customers shall have an approved backflow prevention device consistent with the degree of hazard, as defined by the utility, at the service connection. The backflow protection shall be properly installed double check valve assembly, or a reduced pressure zone device as determined by the utility. In addition, all fire systems that constitute a potential cross connection shall have a utility-approved double check detector assembly at the lines leading to the fire system.

(C)

14.4 Residential Customers shall be required to install an approved backflow prevention device when they apply for a plumbing permit.

(C)

14.5 The utility will terminate water service to a customer's facility if it is determined that a serious contamination potential exists.

(C)

14.6 The utility requires that the Customer shall provide for the testing, maintenance, and repair of backflow devices by a certified backflow prevention assembly technician at least once a year or whenever failure has occurred or is suspected in order to maintain the devices in satisfactory operating condition. The Customer shall also provide, through a certified backflow prevention assembly technician, for the overhaul or replacement of such devices if they are found to be defective. Records of such tests, repairs, overhauls, and replacements shall be submitted by the Customer to the utility. Customers shall be responsible for maintaining records of such tests and related maintenance for a period of the most recent three (3) years. The installation, care, maintenance and repair of backflow devices are at the customer's expense.

(C)

14.7 Non-compliance with the preceding requirements after due notification may result in the discontinuation of water service. The Customer may be required to reimburse the utility for all costs associated with such action.

(C)

Sec. 15 - Frozen Service Lines

15.1 Should any service line become frozen, the utility will thaw out, at its own expense, that portion of the frozen service line between the main and the curb. The customer shall, at his own expense, thaw out that portion of the frozen service line between the curb and his premises.

Sec. 16 - Pools and Tanks

16.1 When an abnormally large quantity of water is desired for filling a swimming pool or for other purposes, arrangements must be made with the utility prior to taking such water.

16.2 Permission to take water in unusual quantities will be given only if it can be safely delivered through the utility's facilities and if other customers are not inconvenienced.

(C) **Indicates Change**

RULES AND REGULATIONS

Sec. 17 - Fire Hydrants

A. Use of and Damage to Fire Hydrants

17.1 No person or persons, other than those designated and authorized by the proper authority, or by the utility, shall open any fire hydrant, attempt to draw water from it or in any manner damage or tamper with it. Any violation of this regulation will be prosecuted according to law.

B. Moving of Fire Hydrants

17.2 When a fire hydrant has been installed in the location specified by the proper authority, the utility has fulfilled its obligation. If a property owner or other party desires a change in the size, type or location of a fire hydrant, he shall bear all costs of such changes, without refund. Any change in the location of a fire hydrant must be approved by the contracting municipality.

C. Installation of Fire Hydrants

17.3 Any municipality which applies for public fire protection service shall pay the cost of providing the public fire hydrant and the installation thereof. The installation shall be in accordance with the requirements of the Bureau of Water of the City of Lancaster.

Sec. 18 - Responsibility for Equipment

18.1 The customer shall, at his own risk and expense, furnish, install and keep in good and safe condition all equipment that may be required for receiving, controlling, applying and utilizing water, and the utility shall not be responsible for any loss or damage caused by the improper installation of such water equipment, or the negligence, want of proper care or wrongful act of the customer or of any of his tenants, agents, employees, contractors, licensees or permittees in installing, maintaining, using, operating or interfering with such equipment. The utility shall not be responsible for damage to property caused by spigots, faucets, valves and other equipment that are open when water is turned on at the meter, either when the water is turned on originally or when turned on after a temporary shutdown.

RULES AND REGULATIONS

Sec. 19 - Access to Premises

19.1 The utility or its duly authorized agents shall at all reasonable times have the right to enter or leave the customers premises for any purpose properly connected with the service of water to the customer.

Sec. 20 - Interruptions in Service

20.1 The utility shall not be liable for damage resulting from an interruption in service. Temporary shutdowns may be resorted to by the utility for improvements and repairs. Whenever possible, and as time permits, all customers affected will be notified prior to such shutdowns.

20.2 The utility will not be liable for interruption, shortage or insufficiency of supply, or for any loss or damage occasioned thereby, if caused by accident, act of God, fire, strikes, riots, war or any other cause not within its control. The utility, whenever it shall find it necessary or convenient for the purpose of making repairs or improvements to its system, shall have the right temporarily to suspend delivery of water and it shall not be liable for any loss or damage occasioned thereby. Repairs or improvements will be prosecuted as rapidly as is practicable and, so far as possible, at such times as will cause the least inconvenience to the customers.

Sec. 21 - Changing Rules and Regulations

21.1 These rules can only be changed in the manner provided by the Public Utility Law. (C)

(C) **Indicates Change**

(C)

Sec. 22 - Water Conservation Contingency Plan

1. "If the Company is experiencing a short term supply shortage, the Company may request general-conservation of inside water uses and may impose mandatory conservation measures to reduce or eliminate nonessential uses of water."
2. A list of all nonessential uses of water includes, at a minimum, those contained in 52 PA. Code 465.1, as listed below:
 - a. The use of hoses, sprinklers, or other means for sprinkling or watering of shrubbery, trees, lawns, grass, plants, vines, gardens, vegetables, flowers, or any other vegetation.
 - b. The use of water for washing automobiles, tracks, trailers, trailer houses, or any other type of mobile equipment.
 - c. The washing of streets, driveways, parking lots, service station aprons, office buildings, exteriors of homes, sidewalks, apartments, or other outdoor surfaces.
 - d. The operation of any ornamental fountain or other structures making a similar use of water.
 - e. The use of water for filling swimming or wading pools.
 - f. The operation of any water-cooled comfort air conditioning which does not have water conserving equipment.
 - g. The use of water from fire hydrants for construction purposes of fire drills.
 - h. The use of water to flush a sewer line or sewer manhole.
 - i. The use of water for commercial farms and nurseries other than a bare minimum to preserve plants, crops, and livestock.
3. Notice of the implementation of the conservation plan shall be sent to all customers *or* be provided by local radio, television, or newspaper advertisements, The utility shall at first request voluntary customer cooperation.

(C) **Indicates Change**

Sec. 22 — Water Conservation contingency Plan, cont.

(C)

4. If voluntary cooperation does not achieve satisfactory results, mandatory compliance will be imposed. If any customer refuses to comply with such mandatory measures, the utility may either adjust the outside water valve connection in a manner which will restrict water flow by up to one-half, or otherwise restrict flow such as by the insertion of a plug device. Note: Prior to such valve adjustment or other flow restriction being imposed, the company must make a bona fide attempt to deliver notice of the valve adjustment or other flow restriction to a responsible person at the affected premises and fully explain the reason for the proposed flow restriction and the means by which the customer may eliminate the grounds for such flow restriction. Less restrictive means may be imposed to secure such compliance.
5. These conservation measures shall be terminated at such time as the supply shortage is eliminated.
6. Complete service termination may be imposed by an Administrative Law Judge or other presiding officer after an expedited hearing has been held to provide the affected customer with an opportunity to be heard.
7. In addition to the provisions as set forth above, the Pennsylvania Emergency Management Council is authorized to promulgate, adopt, and enforce a Water Rationing Plan by virtue of the Emergency Management Services Code, 35 Pa. C.S. #1701 et seq. as implemented by the Drought Emergency Proclamation dated November 6, 1980.

(C) **Indicates Change**

Rules and Regulations Governing the Distribution and Sale of Water

Sec. 23 — Main Extensions

(a) Definitions

(C)

- (1) Annual Line Extension Costs: The sum of the Company's additional annual operating and maintenance costs, debt costs and depreciation charges associated with the construction, operation and maintenance of the line extension.
- (2) Annual Revenue (For Line Extension Purposes): The Company's expected additional annual revenue from the line extension based on the Company's currently effective tariff rates and on the average annual usage of customers similar in nature and size to the bona fide service applicant.
- (3) Bona Fide Service Applicant (For Line Extension Purposes): A person or entity applying for water service to an existing or proposed structure within the Company's certificated service territory for which a valid occupancy or building permit has been issued if the structure is either a primary residence of the applicant or a place of business. An applicant shall not be deemed bona fide service applicant if:
 - (a) applicant is requesting water service to a building lot, subdivision or a secondary residence;
 - (b) the request for service is part of a plan for the development of a residential dwelling or subdivision; or
 - (c) the applicant is requesting special utility service.
- (4) Company Service Line: The water line from the distribution facilities of the Company which connects to the customer service line at the hypothetical or actual line or the actual property line, including the control valve and valve box. The control valve and valve box determine the terminal point for the Company's responsibility for the street service connection.

(C) **Indicates Change**

Rules and Regulations Governing the Distribution and Sale of Water

Sec. 23 Main Extensions, cont.

(C)

- (5) Customer: A person or entity who is an owner or occupant and who contracts with the Company for water service.
- (6) Customer Service Line: The water line extending from the curb, property line or utility connection to a point of consumption.
- (7) Debt Costs: The Company's additional annual cost of debt associated with financing the line extension investment based on the current debt ratio and weighted long-term debt cost rate of the Company or that of a comparable jurisdictional water utility.
- (8) Depreciation Charges: The Company's additional annual depreciation charges associated with the specific line extension investment to be made based on the current depreciation accrual rates for the Company or that of a comparable jurisdictional water utility.
- (9) Line Extension (For Line Extension Purposes): An addition to the Company's main line which is necessary to serve the premises of a customer.
- (10) Operating and Maintenance Costs (For Line Extension Purposes): The Company's average annual operating and maintenance costs associated with serving an additional customer, including customer accounting, billing, collections, water purchased, power purchased, chemicals, and other variable costs based on the current total Company level of such costs, as well as costs particular to the specific needs of that customer, such as fine flushing.
- (11) Public Utility: Persons or corporations owning or operating equipment or facilities in this Commonwealth for diverting, developing, pumping, impounding, distributing or furnishing water to or for the public for compensation.

(C) **Indicates Change**

Rules and Regulations Governing the Distribution and Sale of Water

Sec. 23 —Main Extensions, cont.

(C)

- (12) Short-term Supply Shortage; An emergency which causes the total water supply of a Company to be inadequate to meet maximum system demand.
- (13) Special Utility Service: Residential or business service which exceeds that required for ordinary residential purposes. See additional clarification in the Main Extension portion of this tariff.
- (b) The Company shall construct line extensions in its service territory upon request of a service applicant in the following manner and consistent with the definitions noted above;
 - (1) Line extensions to service applicants shall be funded without customer advance if the annual revenue from the line extension will equal or exceed the Company's annual line extension costs.
 - (2) If the annual revenue from the line extension will not equal or exceed the Company's annual line extension costs, a service applicant may be required to provide a customer advance, including associated taxes, if applicable, to the Company's cost of construction for the line extension. The Company's investment for the line extension shall be the portion of the total construction costs which generate annual line extension costs equal to annual revenue from the line extension. The customer's payment or advance amount shall be determined by subtracting the Company's investment for the line extension from the total construction costs of the line extension.
 - (3) The Company's investment for the line extension shall be based upon the following formula where X equals the Company's investment attributed to

Rules and Regulations Governing the Distribution and Sale of Water

Sec. 23 — Main Extensions, cont.

(C)

bona fide service applicant:

X = $[AR \div DM]$ divided by $[I + D]$, and,

AR = The Company's annual revenue

OM = The Company's annual operation and maintenance expense

I = The Company's debt ratio multiplied by the Company's
weighted long-term debt cost rate.

D = The Company's current depreciation = real rate,

- (c) When a customer advance is required of a bona fide service applicant and an additional customer or customers attach customer service lines to the line extension within ten (10) years from the date of the extension deposit agreement, the Company shall refund a portion of the advance to the customer.
- (1) The Company will refund a per-customer amount for each additional bona fide service applicant from whom a street service connection shall be directly attached to such line extension as distinguished from extensions or branches thereof, Provided, however, that the total amount refunded shall not exceed the original deposit without Interest, and further provided that all or any part of the deposit not refunded within said ten (10) year period shall become the property of the Company and shall be treated as Contributions-in-Aid of Construction for ratemaking purposes, The per customer refund amount shall equal the Company's investment attributed to each bona fide service applicant as calculated in the formula contained in this tariff.
- (d) The Company shall require a customer to pay, in advance, a reasonable charge for service lines and equipment installed on private property for the exclusive use of the customer.

(C) Indicates Change

ISSUED: April 19, 1999

EFFECTIVE: June 18, 1999

Rules and Regulations Governing the Distribution and Sale of Water

Sec. 23 —Main Extensions, cont.

(C)

- (e) Special utility service shall mean residential or business service which exceeds that required for ordinary residential purposes. Section 30, subsections (b) (d) of this tariff do not apply to special utility service. By way of illustration and not limitation, special utility service shall include the installation of facilities such as oversized mains, booster pumps and storage tanks as necessary to provide adequate flows or to meet specific pressure criteria or service to large water consuming commercial and industrial facilities. The Company shall have no duty to construct facilities to provide special utility service. A customer shall advance to the Company the full cost and associated taxes, if applicable, of facilities for special utility service. An otherwise bona fide applicant requesting service which includes a "special utility service" component is entitled to bona fide service applicant status, but only to the extent of the corresponding Company contribution toward the costs of the line extension which do not meet the special utility service criteria.
- (f) Requirement for Extension Deposit Agreement: Where an extension of facilities is not fully funded by the Company pursuant to (a) of this Section, the execution by the applicant of an Extension Deposit Agreement for customer contribution or advance shall be a condition of extending the facilities. Upon notice that the Company is prepared and able to go forward with the work, the applicant will deposit with the Company the amount specified in the Extension Deposit Agreement.
- (g) Size and Type of Line: The Company shall have the exclusive right to determine the type and size of lines to be installed and the other facilities required to render adequate service. Where the Company decides, however, to install a pipe larger than necessary to render extension of adequate service to the applicant, estimated or actual cost figures in the Extension Deposit Agreement shall include only the material and installation cost for a pipe the size and type of which is necessary in the Company's judgement to provide adequate service to the applicant. Any incremental costs of a larger pipe will be the responsibility of

(C) **Indicates Change**

Rules and Regulations Governing the Distribution and Sale of Water

Sec. 23 —Main Extensions, cont.

(C)

the Company. All estimated or actual cost figures referred to in the Extension Deposit Agreement shall include a reasonable allowance for overhead costs and an allowance for taxes as appropriate and applicable. The minimum size for main extensions shall be six (6) inches pursuant to Commission regulation at 52 Pa. Code § 65,17(b).

- (h) Determination of Extension Length: In determining the length of any extension, the terminal point of such extension shall be at that point in the curb line which is equidistant from the side property lines of the fast lot for which water service is requested, A Company service connection will be provided only for customer service lines that extend at right angles from the curb line in a straight line to the premises to be served.
- (i) Cost True-ups: At the conclusion of the line extension project there shall be a reconciliation of the actual costs incurred to the amount of extension deposit that has been paid by the customer. If the actual cost exceeds the deposit, the applicant shall be responsible for payment to the Company of the difference in a manner specified by the Company. If the deposit exceeds the actual cost, the Company shall refund the difference.

(C) **Indicates Change**

ISSUED: April 19, 1999

EFFECTIVE: June 18, 1999

Rules and Regulations Governing the Distribution and Sale of Water

(C)

FORM OF EXTENSION DEPOSIT AGREEMENT

THIS AGREEMENT entered into this ___ day of _____, 19___, by and between the Water Bureau of the City of Lancaster, (hereinafter called the "UTILITY") and _____ (hereinafter called the "DEPOSITOR").

WHEREAS, the Depositor desires extension of the water mains of the Utility, as hereinafter described:

NOW, THEREFORE, this agreement WITNESSETH:

FIRST: The Utility contracts and agrees to lay the water main(s) (and other facilities, if any), as shown in red on the diagram hereto attached and made a part hereof described and located as follows:

SECOND: It is expressly understood and agreed that, if the Utility shall be delayed or prevented from installing the water main (a) (and other facilities, if any), hereinbefore described because of its failure to secure pipe or construction materials, or for any other causes beyond its control, such failure or delay in performance shall be excused; provided, however, if such failure or delay in performance shall extend for a period of more than one (1) year from date hereof, the Depositor shall have The right to cancel and terminate this Agreement on thirty (30) days' written notice to the utility, and thereafter both parties shall be relieved of all duties and obligations arising hereunder. But this right to cancel and terminate by the Depositor shall not be invoked if the Utility has received the construction material and the Depositor has made the deposit as hereinafter required, in which event the Utility shall have the obligation to prosecute the work diligently to its completion.

(C) **Indicates Change**

ISSUED: April 19, 1999

EFFECTIVE: June 18, 1999

Rules and Regulations Governing the Distribution and Sale of Water (C)

THIRD: In an extension involving a bona fide service customer, the Depositor hereby agrees to deposit with the Utility, upon notice from the Utility, that it is prepared and able to go forward with the work provided in Paragraph FIRST hereof, an amount of cash equal to (a) the estimated cost of the extension, including the estimated cost of said main(s) and the estimated cost of any other facilities, including but not limited to facilities necessary to render special utility service, which the Utility shall have decided are required to render adequate service, but excluding the cost of public fire hydrants and hydrant laterals and the necessary meters and street service connections, less (b) a credit equal to the amount of the Utility's investment attributable to the number of bona fide service applicants who will be served directly by said extension. Upon such written notice, a Preliminary Memorandum, in the form attached, shall be prepared and signed by both parties showing the deposit required in accordance with the foregoing provisions. Upon the completion of the installation of the extension, a Final Memorandum, in the form attached, shall be prepared and signed by both parties, showing the deposit required based on (a) actual cost of the extension, including the actual installation cost of the mains and other facilities, Less (b) the appropriate, credit allowance based on actual cost. If the deposit shown to be due on the Final Memorandum differs from that shown on the Preliminary Memorandum, the Depositor will deposit any additional amount shown to be due or the Utility will refund to the Depositor any excess amount shown to have been deposited, it being the intent of this agreement that the deposit required shall be based on the actual installation cost.

FOURTH: In any extension involving any applicant other than a bona fide service applicant, the Depositor hereby agrees to deposit with the Utility, upon notice from the Utility that is prepared and able to go forward with the work provided in Paragraph FIRST hereof, an amount of cash equal to the estimated cost of the extension, including the estimated cost of main(s), and the estimated cost of any other facilities including, but not limited to, facilities necessary to render special utility service, which the Utility shall have decided are required to render adequate service, including the cost of fire hydrants and hydrant laterals where application for public fire hydrants is made by the applicant and not by public authority, and the Cost of street service connections, but excluding the cost of necessary meters. The same provisions for the preparation of

(C) Indicates Change

ISSUED: April 19, 1999

EFFECTIVE: June 18, 1999

Rules and Regulations Governing the Distribution and Sale of Water (C)

Preliminary and Final Memoranda and the adjustments of estimated and actual costs of the extension, as outlined in Paragraph THIRD, shall apply to this extension.

FIFTH: The Utility hereby agrees to refund to the Depositor during the period of ten (10) years from the actual date of the deposit an amount equal to a per customer amount for each additional bona fide service applicant from whom a street service connection shall be directly attached to such main extension, as distinguished from extensions or branches thereof; provided, however, that the total amount refunded shall not exceed the original deposit, without interest, and that all or any part of the deposit not refunded within said ten (10) year period shall become the property of the Utility And shall be treated as Contributions-in-Aid of Construction for ratemaking purposes. The per customer refund amount shall equal the Utility's investment attributed to each bona fide applicant as calculated in the formula contained in the Utility's tariff. For non-bona fide applicants, the refund amount shall be equal to the utility's average per customer investment in mains and accessories as shown on the utility's books of accounts.

SIXTH: The Depositor may request refunds under Paragraph FIFTH, once in each calendar quarter, furnishing the Utility, at such time, a listing of additional customers attached to the main(s) covered by this agreement; however, a failure on the part of the Depositor to make such request shall not constitute a waiver of any rights hereunder or relieve the Utility of the obligation to make refunds with reasonable promptness.

SEVENTH: The ownership of the water main(s) laid hereunder shall at all times be in the Utility, its successors and assigns.

EIGHTH: This agreement shall be valid and binding on the Utility only when executed by an authorized Utility representative.

NINTH: This agreement shall be binding upon the heirs, executors, administrators, successors, and assigns of the respective parties.

(C) Indicates Change

ISSUED: April 19, 1999

EFFECTIVE: June 18, 1999

Rules and Regulations Governing the Distribution and Sale of Water (C)

TENTH: Any notice given hereunder shall be deemed sufficient if in writing and sent by certified mail to the Utility at Bureau of Water, City Hall, Lancaster, Pennsylvania, and to the Depositor at _____

ELEVENTH: This agreement is entered into pursuant to the legally established Rules and Regulations of the Utility contained (c) in its tariff; as may be amended from time to time, and the words, phrases, and terms hereof are to be understood and interpreted in conformity with said Rules and Regulations which are incorporated herein by reference.

Executed in triplicate by the parties hereto on the date first above written

WITNESS: _____ By: CITY OF LANCASTER
BUREAU OF WATER

WITNESS: _____ By: DEPOSITOR

(C) Indicates Change

ISSUED: April 19, 1999

EFFECTIVE: June 18, 1999

Rules and Regulations Governing the Distribution and Sale of Water (C)

PRELIMINARY MEMORANDUM

This Preliminary memorandum is executed by the parties hereto under and pursuant to the provisions of Paragraphs THIRD and FOURTH of a certain agreement in writing between the parties entered into on the ___ day of _____, 19___, for the installation by the Utility of a certain water main(s) therein described. It is, therefore, agreed and stipulated:

	Bona Fide Service <u>Applicants</u>	All Other Applicants
(a) Estimated Cost of Mains	_____	_____
(b) Estimated Cost of other facilities Services	None	_____
Fire Hydrants	None	_____
Other	_____	_____
(c) Total	_____	_____
(d) Credit Allowance		

The Utility's investment where X equals the Utility's investment attributable to each bona fide service applicant,

X = [AR - OM) divided by[I + D], and;

AR = the Company's annual revenue

OM = the Company's operating and maintenance costs

I = the Company's current debt ratio multiplied by the Company's weighted long-term debt cost rate

D = the Company's current depreciation accrual rate

(e) Amount of deposit (e) (d) _____

This Preliminary memorandum shall be attached to the original agreement in accordance with the provisions of Paragraphs THIRD and FOURTH thereof.

(C) Indicates Change

ISSUED: April 19, 1999

EFFECTIVE: June 18, 1999

Rules and Regulations Governing the Distribution and Sale of Water (C)

Dated _____
(Date of Deposit)

WITNESS:

By: CITY OF LANCASTER
BUREAU OF WATER

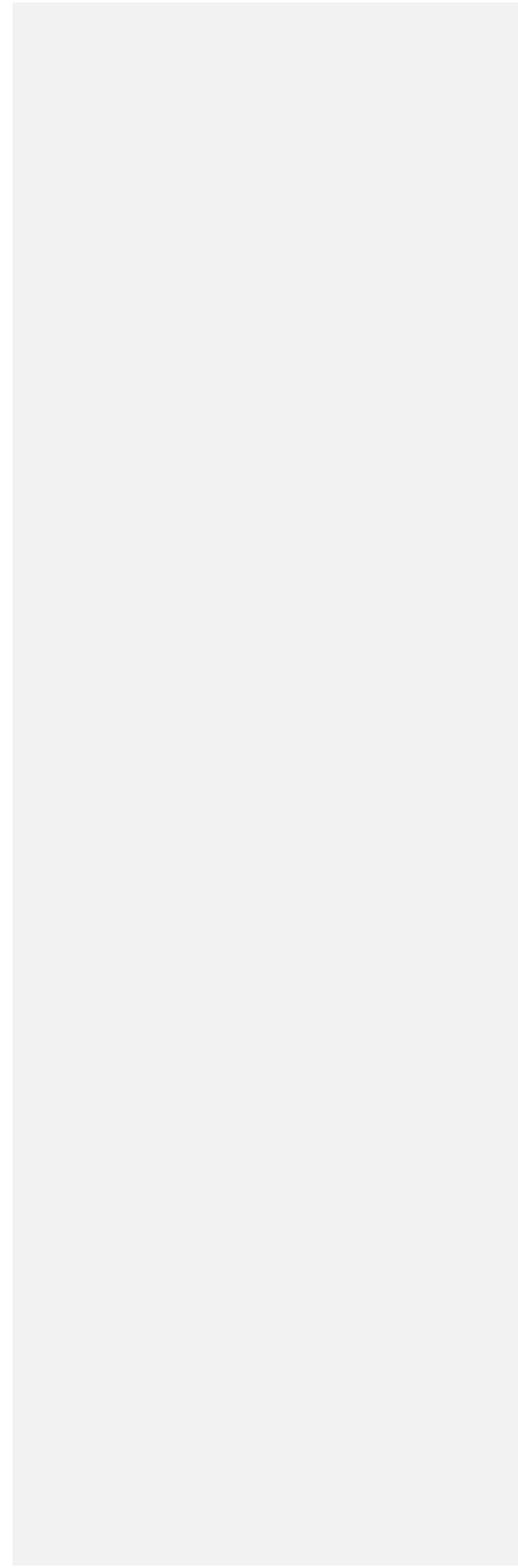
WITNESS:

By: DEPOSITOR

(C) Indicates Change

ISSUED: April 19, 1999

EFFECTIVE: June 18, 1999



Rules and Regulations Governing the Distribution and Sale of Water (C)

FINAL MEMORANDUM

This Final memorandum is executed by the parties hereto under and pursuant to the provisions of Paragraphs THIRD and FOURTH of a certain agreement in writing between the parties entered into on the ___ day of _____, 19___, for the installation by the utility of a certain water main(s) therein described. It is, therefore, agreed and stipulated:

		Bona Fide Service	
		<u>Applicants</u>	<u>Developer</u>
(a)	Actual Cost of Mains	_____	_____
(b)	Actual Cost of other facilities Services (_____ x _____) No. Unit Cost	None	_____
	Fire Hydrants	None	_____
	Other	_____	_____
(c)	Total	_____	_____
(d)	Credit Allowance	_____	

The Utility's investment where X equals the Utility's investment attributable to each bona fide service applicant,

- X = [AR - OM) divided by[I + D], and;
- AR = the Company's annual revenue
- OM = the Company's operating and maintenance costs
- I = the Company's current debt ratio multiplied by the Company's weighted long-term debt cost rate
- D = the Company's current depreciation accrual rate

(e)	Amount of Final Estimate of Deposit (c) (d)	_____	_____
(f)	Amount of Preliminary Estimate of Deposit	_____	_____
(g)	Adjustment of Deposit		
	(a) Balance Owing Applicant	_____	_____
	(b) Balance Owing Utility	_____	_____

(C) **Indicates Change**

ISSUED: April 19, 1999

EFFECTIVE: June 18, 1999

Rules and Regulations Governing the Distribution and Sale of Water (C)

- (h) Basis of Refund - (See Paragraph FIFTH)
 - (a) Each Additional Bona Fide Customer (I) x (If)
 - (b) Add Unit Cost of Service Connection & Advanced by Developer None _____

This Final Memorandum shall be attached to the original agreement in accordance with the provisions of Paragraphs THIRD and FOURTH thereof.

Dated _____

WITNESS:

By: CITY OF LANCASTER
BUREAU OF WATER

WITNESS:

By: DEPOSITOR

(C) Indicates Change

ISSUED: April 19, 1999

EFFECTIVE: June 18, 1999

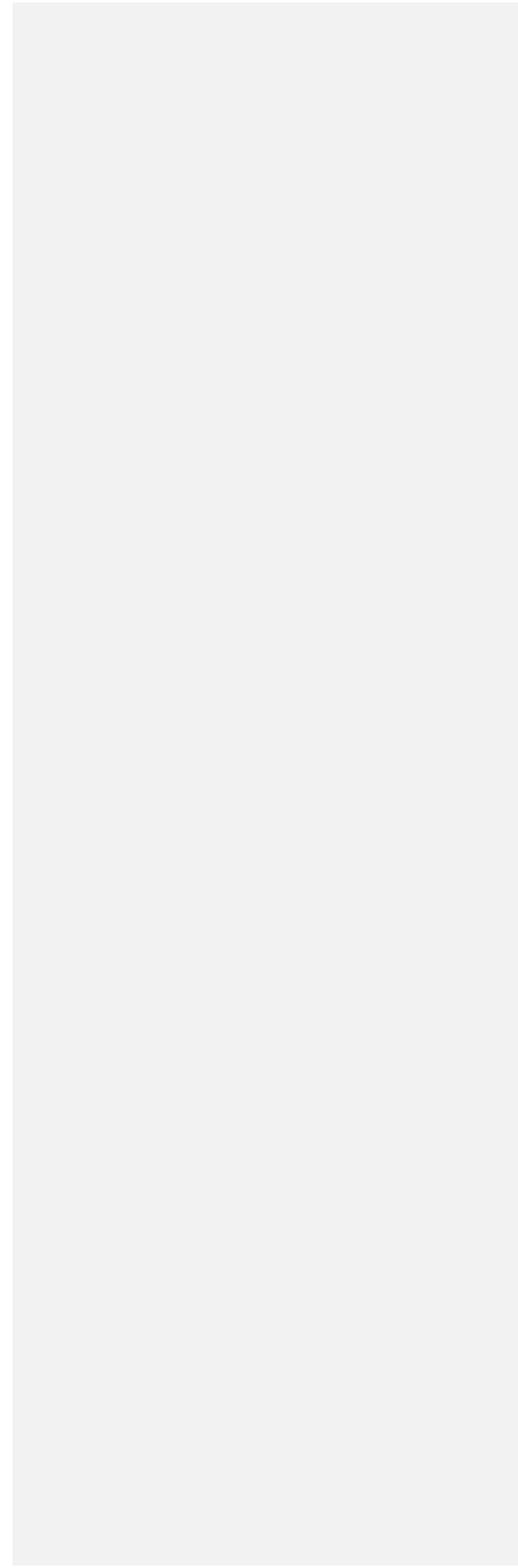


EXHIBIT B



CITY OF LANCASTER
120 NORTH DUKE STREET
P.O. BOX 1599
LANCASTER, PA 17608

LONG TERM INFRASTRUCTURE IMPROVEMENT PLAN

September 2022

Revised February 1, 2023

**Stephen Campbell, Director of Public Works
and
Benjamin M. Perwien, P.E., Utility Engineer
Bureau of Water**

CITY OF LANCASTER
LONG TERM INFRASTRUCTURE IMPROVEMENT PLAN

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The City of Lancaster is submitting this Long-Term Infrastructure Improvement Plan (“LTIIIP”) in accordance with the requirements of Subchapter B, Distribution Systems of 66 Pa. C.S. §1350-1360 and the Public Utility Commission’s Final Implementation Order, Docket No. M-2012-2293611, entered August 2, 2012, for the establishment of a Distribution System Improvement Charge (“DSIC”).

INTRODUCTION

The City of Lancaster owns the water distribution system, which is operated and maintained by the City of Lancaster - Department of Public Works, Bureau of Water.¹ The Lancaster water distribution system covers approximately 55 square miles in Lancaster County.

Major facilities in the water system include transmission and distribution mains, pumping stations, pressure reducing stations, a reservoir and storage tanks.

This LTIIIP describes capital improvement recommendations for the City of Lancaster in the Public Utility Commission (“PUC”) regulated area. This plan presents a strategy for infrastructure improvements to ensure that Lancaster can continue to provide safe, high quality, and reliable service to its customers. The City of Lancaster provides water service to over 49,000 customers in Lancaster County in Pennsylvania. Customers are served in the City of Lancaster; portions of the following townships: Lancaster, East Lampeter, West Lampeter, Pequea, Manor, Manheim, and West Hempfield; Millersville Borough and through bulk water agreements with East Petersburg, Upper Leacock Water Authority, West Earl Water Authority, East Hempfield Water Authority, and Northwestern Lancaster County Authority (Penn Township). The area of The City of Lancaster System that the PUC regulates is all of the territory outside of the City boundaries and includes about 31,300 customers. The capital improvements that are in this LTIIIP are allocated for projects serving areas outside Lancaster’s city limits.

In 2021, water demands averaged 20.707 million gallons per day (“MGD”) and maximum day demands were 24.407 MGD. Customer growth in the Lancaster system is forecasted by review of the Lancaster County Planning Commission population projections and planning and zoning information from the municipalities within the City’s Franchise Area obtained from Lancaster County GIS. Average water demands are projected to increase to 26.131 MGD by 2040. Maximum day demands are forecasted to increase to 34.385 MGD by 2040.

Lancaster recognizes the need for continual renewal and replacement of its distribution system to maintain safe, reliable, high-quality water service to its customers. Over the next ten years Lancaster will continue its annual main renewal and replacement program. Locations for pipeline infrastructure improvements will be associated with street improvement plans, history of main breaks, necessary system maintenance, projects associated with fire flow improvements, and system improvements to provide resiliency. This plan outlines the five-year plan for those system improvements.

¹ Sometimes referred to herein as the “City”, “Lancaster” or the “City of Lancaster”, all of which should be read to be referring to the Bureau of Water in most if not all contexts unless otherwise indicated.

1.0 TYPE AND AGE OF ELIGIBLE PROPERTY

The City of Lancaster's water system includes the raw water intake system on the Susquehanna and Conestoga rivers, two treatment plants and the treated water distribution system, including associated tanks and pumping stations. The raw water system includes supply intakes at the Susquehanna and Conestoga rivers, strainer facilities, low service pump buildings, over one mile of transmission mains, and three valves. The Susquehanna and Conestoga Water Treatment Plants were upgraded to membrane filtration with a capital improvement project that ended in 2011. Membranes were replaced at Conestoga in 2021, and four of eight membrane trains were replaced in 2021 at Susquehanna. The remaining four Susquehanna membrane trains were replaced in 2022. The finished water distribution system includes two high service pump stations, over 620 miles of distribution and transmission main, over 5,000 hydrants, over 47,000 customer water meters and service lines, 12,000 valves, four booster pumping stations, a 15 million gallon reservoir, five storage tank facilities, four pressure reducing valve stations, and a supervisory control and data acquisition ("SCADA") system. Eligible property for the purpose of the LTIP is limited to the portion of the City of Lancaster's water system that is regulated by the PUC, and is limited to Transmission and Distribution Lines, Hydrants and Pipeline Valves, Water Meters, and the SCADA System.

Low Service Pumps and Strainer Building

The Susquehanna low service pumps are 400 horsepower with magnetic metering that provides flow at approximately 40 psi to the strainer building. The low service pumping station was built as part of the original plant construction in 1956 and was rehabilitated in 2011 as part of the Membrane Filtration Project. A new strainer building was constructed as part of the Membrane Filtration Project completed in 2011. The flow is then pumped through a single 42-inch diameter steel water main for approximately one mile to the plant. There is no redundant main for this raw water intake pipe which was installed as part of the original plant construction in the 1950s.

The Conestoga low service pumps are 150 horsepower with venturi metering. The pump building was rebuilt in 1974 and was rehabilitated in 2001. A new strainer building was constructed as part of the Membrane Filtration Project in 2011. The flow is then pumped through a single 30-inch diameter ductile iron water main for approximately 810 feet to the plant.

Water Distribution System

The City of Lancaster water distribution system serves over 49,000 customers. The distribution network includes over 620 miles of pipe, ranging in size from 2-inch diameter to 42-inch diameter. Pipe materials in the system include asbestos cement, cast iron, cement-lined ductile iron, galvanized iron, steel, PVC, and cement-lined cast iron pipe. A majority of the water mains in the system are over 50 years old, and some mains are over 150 years old. Over 40 miles of water main within the system is over 100 years old. Over 40 miles of water mains are transite. There are approximately 13,000 pipeline valves, 4,950 hydrants, over 49,000 customer water meters, and over 188 miles of service lines in the Lancaster system.

Pipeline information is presented in Table 1-1, pipeline valve information is presented in Table 1-2, and water meter information is presented in Table 1-3.

Most of the Lancaster service area is served as a single pressure gradient. Treated water from the Susquehanna Water Treatment Plant flows through a 42-inch steel transmission main for approximately 4 miles to the Oyster Point Reservoir, where it flows another seven miles through 42-inch steel main to Race Avenue at the western edge of the City of Lancaster. The 42-inch main was installed in 1956. There are several smaller transmission mains that tie into the 42-inch main. In 2019, the City constructed the first phase of a three phase plan to create a replacement main for the original 42-inch steel main. This first phase was from the Oyster Point Reservoir to the western edge of the City, the second and third phases are explained in more detail in Section 2. Treated water from the Conestoga Water Treatment Plant flows under the Conestoga River and ties into transmission mains on New Holland Avenue through approximately one mile of a 36-inch ductile iron transmission main that was installed in 1970. A redundant main flows under the Conestoga River. It was installed in 1992, it utilizes 3,800 feet of 30-inch ductile iron transmission main and ties into an older transmission main at the intersection of Grofftown Road and Chestnut Street.

There are four pressure zones served by four booster pumping stations within the water system. They include the main pressure zone, the Blossom Hill pressure zone, the Willow Street pressure zone and the Lampeter pressure zone. The Lancaster distribution system storage is provided by five tanks and a reservoir. There are 26.4 million gallons of storage in the system. The main pressure zone is supplied water by the Oyster Point Reservoir, the Lafayette Tank, the Neffsville Tank, the Northwest Pump Station, and the East Pump Station and transmission mains from the two water plants. The Blossom Hill pressure zone is supplied water by the Blossom Hill Tank and the Hess Boulevard Pump Station. The Willow Street pressure zone is supplied water by the Willow Street Tank and Pump Station. The Lampeter pressure zone is supplied water by the Book Road Tank and flow is regulated by a pressure reducing valve (“PRV”) from the Willow Street pressure zone. Pressure zone tank storage and pump station information is summarized in Tables 1-4 and 1-5.

There are five bulk water customers that are served by the Lancaster system that supply water to communities located in East Petersburg Township, Upper Leacock Water Authority, West Earl Water Authority, East Hempfield Water Authority and North Western Lancaster County Authority (Penn Township). Maximum allocated water usage is summarized in Table 1-6.

SCADA System

The SCADA system allows the plant operator to monitor existing conditions of all tank levels and pump stations within the entire system. The software allows them to control the plant output to allow for the system to operate efficiently. In addition, the system allows for pump stations to be monitored from the plants.

Table 1-1
City of Lancaster
Distribution System Pipeline Information Total System

Diameter (Inches)	Pipe Length (Feet)	Pipe Length (Miles)	Percentage of Total
2"	10,693	2.025	0.324%
4"	92,231	15.182	2.431%
6"	1,477,775	271.860	43.525%
8"	985,612	198.176	31.728%
10"	45,549	6.985	1.118%
12"	412,224	76.314	12.218%
16"	141,664	26.856	4.300%
20"	9,969	0.740	0.118%
24"	67,002	12.690	2.032%
30"	10,531	1.995	0.319%
36"	4,986	0.944	0.151%
42"	57,210	10.835	1.735%
Total	3,315,446	624.603	100%

Age Range	Pipe Length (Feet)	Pipe Length (Miles)	Percentage of Total
Before 1900	147,598	27.954	4.452%
1900-1909	20,160	3.818	0.608%
1910-1919	10,667	2.020	0.322%
1920-1929	236,095	44.715	7.121%
1930-1939	99,366	18.819	2.997%
1940-1949	59,879	11.341	1.806%
1950-1959	537,903	101.876	16.224%
1960-1969	323,907	61.346	9.770%
1970-1979	370,148	70.104	11.164%
1980-1989	600,336	113.700	18.107%
1990-1999	402,513	76.234	12.141%
2000-2010	300,632	56.938	9.068%
2010-2019	179,727	34.039	5.421%
2020+	26,515	5.022	0.800%
Total	3,315,446	627.925	100%

Table 1-2
City of Lancaster
Distribution System Valve Information Total System

Valve Diameter	Number of Valves (1)	Percentage of Total
2"	41	0.301%
4"	196	1.441%
6"	8,725	64.150%
8"	3,274	24.072%
10"	156	1.147%
12"	899	6.610%
16"	176	1.294%
20"	13	0.096%
24"	64	0.471%
30"	42	0.309%
36"	10	0.074%
42"	5	0.037%
Total	13,601	100%

Age Range	Number of Valves (1)	Percentage of Total
Before 1900	968	7.117%
1900-1909	56	0.412%
1910-1919	10	0.074%
1920-1929	1,003	7.374%
1930-1939	310	2.279%
1940-1949	210	1.544%
1950-1959	1,477	10.859%
1960-1969	1,260	9.264%
1970-1979	1,554	11.426%
1980-1989	2,688	19.763%
1990-1999	1,641	12.065%
2000-2010	1,431	10.521%
2010-2019	868	6.382%
2020+	125	0.919%
Total	13,601	100%

(1) Estimated

Table 1-3
City of Lancaster
Customer Meter Information Total System

Meter size	Number of Meters	Percent Total
5/8"	25,887	53.03%
5/8"x3/4"*	9,430	19.32%
3/4"	4,575	9.37%
3/4"x1"***	4,763	9.76%
1"	2,332	4.78%
1-1/2"	511	1.05%
2"	1,004	2.06%
4"	115	0.24%
6"	116	0.24%
8"	61	0.12%
10"	23	0.05%
Total	48,817	100.00%

*Meter size of 5/8" x 3/4" is a 3/4" service lateral from the main to the meter, but the meter size is 5/8".

**Meter size of 3/4" x 1" is a 1" service lateral from the main to the meter, but the meter size is 3/4".

Age Range	Number of Meters	Percent Total
Pre 1995	435	0.89%
1995-2000	442	0.91%
2001-2005	1,954	4.00%
2006-2010	4,746	9.72%
2011 to today	41,240	84.48%
Total	48,817	100.00%

Table 1-4
City of Lancaster
Distribution System Pipeline Information for PUC Regulated Area

Diameter (Inches)	Pipe Length (Feet)	Pipe Length (Miles)	Percentage of Total
2"	8,437	1.598	0.320%
4"	43,825	8.300	1.664%
6"	1,116,188	211.399	42.379%
8"	897,713	170.021	34.084%
10"	24,732	4.684	0.939%
12"	319,435	60.499	12.128%
16"	116,994	22.158	4.442%
20"	318	0.060	0.012%
24"	46,572	8.820	1.768%
30"	4,004	0.758	0.152%
36"	0	0.000	0.000%
42"	55,577	10.526	2.110%
Total	2,633,795	498.825	100%
Age Range	Pipe Length (Feet)	Pipe Length (Miles)	Percentage of Total
Before 1900	4,903	0.929	0.186%
1900-1909	10,619	2.011	0.403%
1910-1919	4,569	0.865	0.173%
1920-1929	105,997	20.075	4.024%
1930-1939	58,351	11.051	2.215%
1940-1949	42,587	8.066	1.617%
1950-1959	445,090	84.297	16.899%
1960-1969	283,571	53.707	10.767%
1970-1979	310,594	58.825	11.793%
1980-1989	539,568	102.191	20.486%
1990-1999	360,761	68.326	13.697%
2000-2010	294,268	55.733	11.173%
2010-2019	153,645	29.099	5.834%
2020+	19,272	3.650	0.732%
Total	2,633,795	498.825	100%
Type of Main	Pipe Length (Miles)	Percentage of Total	
Ductile Iron	304.098	60.96%	
Cast Iron	143.031	28.67%	
Asbestos Cement	36.878	7.39%	
Plastic	4.292	0.86%	
Steel	10.526	2.11%	
Total	498.825	100%	

Table 1-5
City of Lancaster
Distribution System Valve Information for PUC Regulated Area

Age Range	Number of Valves (1)	Percentage of Total
Before 1900	9	0.090%
1900-1909	23	0.229%
1910-1919	7	0.070%
1920-1929	338	3.372%
1930-1939	149	1.486%
1940-1949	129	1.287%
1950-1959	1,202	11.991%
1960-1969	1,068	10.654%
1970-1979	1,236	12.330%
1980-1989	2,311	23.055%
1990-1999	1,467	14.635%
2000-2010	1,410	14.066%
2010-2019	630	6.285%
2020+	45	0.449%
Total	10,024	100%

Valve Diameter	Number of Valves (1)	Percentage of Total
2"	30	0.299%
4"	94	0.938%
6"	6,243	62.281%
8"	2,795	27.883%
10"	59	0.589%
12"	603	6.016%
16"	112	1.117%
20"	1	0.010%
24"	43	0.429%
30"	38	0.379%
36"	1	0.010%
42"	5	0.050%
Total	10,024	100%

(1) Estimated

Table 1-6
City of Lancaster
Customer Meter Information for PUC Regulated Area

Meter size	Number of Meters	Percent Total
5/8"	11,734	37.27%
5/8"x3/4"*	8,773	27.86%
3/4"	3,136	9.96%
3/4"x1"***	4,719	14.99%
1"	1,904	6.05%
1-1/2"	326	1.04%
2"	677	2.15%
4"	62	0.20%
6"	91	0.29%
8"	51	0.16%
10"	13	0.04%
Total	31,486	100.00%

*Meter size of 5/8" x 3/4" is a 3/4" service lateral from the main to the meter, but the meter size is 5/8".

**Meter size of 3/4" x 1" is a 1" service lateral from the main to the meter, but the meter size is 3/4".

Age Range	Number of Meters	Percent Total
Pre 1995	197	0.63%
1995-2000	279	0.89%
2001-2005	1,521	4.83%
2006-2010	3,293	10.46%
2011 to today	26,196	83.20%
Total	31,486	100.00%

Table 1-7
City of Lancaster
Distribution System Pump Information
Assets Not DSIC Eligible

Pumping Station	Construction Date	# of Pumps	Rated Flow (GPM)	Rated Total Dynamic Head	Motor HP	Drive Type	Back-Up Power
Low Service - Conestoga	1999	2	8333	50	150	VFD	Online November 2022
Low Service - Susquehanna	2010	3	9550	137	400	VFD	Online November 2022
High Service - Conestoga	1999	2	8333	260	750	VFD	Online November 2022
High Service - Susquehanna	2010	3	8333	294	800	VFD	Online November 2022
Hess Boulevard	1997	2	800	155	40	Telemecanique Altistart3 soft starter	100 kW Generator
Northwest	2011	4	7000	220	200	Eaton CPX9000 VFD	No
East	2015	2	4000	75	100	Eaton CPX9000 VFD	180 kW Generator
Willow Street	2012	2	2000	230	150	Eaton CPX9000 VFD	280 kW Generator

Table 1-8
City of Lancaster
Distribution System Storage Information
Assets Not DSIC Eligible

Storage Name	Construction Date	Last Year Painted	Dimensions or Diameter	Overflow Elevation (Feet)	Bottom Elevation (Feet)	Storage Height (Feet)	Nominal Capacity	Type
Oyster Point Reservoir	1956	N/A	102400 SF Rectangle	518	498	20	15 MG	Covered In-Ground
Lafayette Tank	1967	1986	113' Diameter	518	419	99	7.5 MG	Steel Standpipe
Willow Street Tank	1989	2013	52'	611	493	118	1.88 MG	Steel Standpipe
Neffsville Tank	1968	1986	60' Diam	518	430	88	1.86 MG	Steel Standpipe
Lampeter Tank*	1968	1986	40.5' Diam	560	531	29	.3 MG	Steel Spheroid
Blossom Hill Tank	1955	1984	23' Diam	589	510	79	.25 MG	Steel Standpipe
							Total 26.11 MG	

*Lampeter Tank is no longer in service. This area is now part of the Willow Street Pressure Zone.

2.0 SCHEDULE FOR PLANNED REPAIR AND REPLACEMENT OF DSIC ELIGIBLE PROPERTY

Lancaster recognizes the need for ongoing renewal and replacement of its distribution system to maintain safe, reliable, high-quality water service to its customers. Renewal of the system includes cleaning and relining of mains to improve water quality issues when minimal break history exists. Replacement of the system infrastructure involves annual pipeline replacement that target small-diameter mains that are problematic (based on break history), or have capacity issues. Renewal of system infrastructure also involves specific projects identified to address issues associated with pumping stations, storage facilities and SCADA systems. Other construction projects involve installation of main extensions to eliminate dead ends within the system.

Over the next 5 years Lancaster will increase its existing annual main renewal and replacement program, provided it has sufficient revenue to support that increased activity. Locations for pipeline infrastructure improvements (shown on Table 5-1) will be associated with street improvement plans, history of main breaks, necessary system maintenance, projects associated with fire flow improvements, and system improvements to provide redundancy. Table 5-1 is a listing of DSIC projects for the areas outside the Lancaster City limits. i.e., in the PUC Regulated Area.

The Susquehanna Large Diameter Replacement Main Project originally consisted of five phases of construction from the Susquehanna River to the western city limits of Lancaster. The purpose of this project is to provide system resiliency, given the sole transmission main from the Susquehanna Water Treatment Plant is over 60 years old, and to also provide additional pressure during peak demand periods. The existing 42-inch water main has had numerous breaks and supplies 66% of the total system consumptive flows. The first phase of this project (transmission main replacement from the Oyster Point Reservoir into the City) was completed in 2021. This project has been re-prioritized, where the third phase of the project (transmission main replacement from the Susquehanna River to the Susquehanna Water Treatment Plant) will be scheduled before the second phase (transmission main replacement from the Susquehanna Water Treatment Plant to Oyster Point Reservoir). The third phase should be bid in 2023 with a completion date in 2025 with an estimated construction cost of \$9.761 million. Due to this phase being a raw water main, this is not eligible property, but it is still a part of the overall project. The second phase would likely start in the 2026–2027-time frame, based upon the amount of due diligence required for the acquisition of easements as well as securing additional bonding/financing. Phase 2 of this project is estimated to cost \$31.758 million in current dollars (which is 50% more than the first phase construction costs).

As the City of Lancaster’s water system ages, the need to replace the old cast iron lines becomes paramount. The design life of iron pipe is typically 100 years. Currently, the City has just over 4 miles of water main that was installed over 100 years ago in the PUC Regulated area. The City has an annual main replacement project that addresses the old cast iron mains and replaces them with new ductile iron main. Since the City is planning to coordinate with its municipal partners, as to not replace main in areas that have recently been paved, the City does not know what segments of streets are going to be in the project year over year.

In addition to its normal schedule of replacement of old cast iron mains, the City of Lancaster has approximately 42 miles of transite water main that is quickly coming to the end of the materials design life. In April/May 2017 the City repaired 19 water main breaks in 17 days in one development. Boil water advisories were issued with each main break since transite mains cannot be repaired under pressure. As a result of these main breaks, the City's priority shifted to replacing the transite mains. In 2021, the transite mains in the Colonial Manor service area were also replaced after a series of breaks. The City is planning to increase the amount that it spends on transite main replacement, and is planning to replace \$2 million per year to start, with escalations in the succeeding years. This would equal about 6,700 linear feet of main replaced per year. Prioritization of these replacements would be based on known break history and paving schedules of the surrounding municipalities as well as PennDOT.

The City of Lancaster recognizes the need to address lead in service lines. During the pandemic lockdown in 2020, the City digitized all of its service line records, which were on paper, and input them into its GIS system. With this completed, the City of Lancaster now knows of the existence of approximately 550 lead services within the City's total distribution system including about 85 services in the PUC Regulated area. The estimated cost to replace a service from the curb stop to the meter is around \$10,000. The City owns the portion of the service from the main to the curb stop. The customer owns from the curb stop to the meter. The 85 services are spread out though the older developments in the PUC Regulated Area. The City is planning to replace these services over the next few years. The City is actively assessing the feasibility of a lead service line replacement ("LSLR") schedule. The City's assessment has included evaluating various LSLR programs from a public health standpoint while also remaining cognizant of potential fiscal impact. Other considerations include: nature and extent of the LSLR program; duration of the program; and practical considerations associated with bidding any potential contract for the program. In connection with the settlement reached in Docket No. P-2022-3035591, the City has removed the cost of the lead service replacements for the 85 identified City-owned services in the PUC Regulated Area from its LTIIIP. The City will include the work to be completed and costs for replacement of both the customer-owned and City-owned portion of the lead services in the PUC Regulated Area, *i.e.*, its LSLR Plan, in an updated LTIIIP, which will be filed in a separate docket in connection with a request for Commission approval of an LSLR Program, pursuant to 66 Pa. C.S.A. § 1311(b) and 52 Pa. Code §§ 65.51, *et seq.*²

² See also 52 Pa. Code § 65.54(b) which requires that "An entity that has a Commission-approved LTIIIP shall include with its LSLR program petition a modified LTIIIP containing a LSLR plan as a separate and distinct component of the entity's LTIIIP."

3.0 LOCATION OF ELIGIBLE PROPERTY

Customers are served in the City of Lancaster and portions of the following townships: Lancaster, East Lampeter, West Lampeter, Pequea, Manor, Manheim, and West Hempfield; and Millersville Borough.

Eligible property in the Lancaster system includes the following water distribution facilities:

- Transmission and distribution mains;
- Hydrants and pipeline valves;
- Water meters; and
- SCADA system.

4.0 REASONABLE ESTIMATE OF THE QUANTITY OF ELIGIBLE PROPERTY TO BE IMPROVED

The quantity of eligible property to be improved has been estimated based on budget availability, bonding, projected customer water needs, and allowances for interim repair issues. The proposed cost to construct these improvements are based on engineering total construction estimates in 2022 dollars. Actual costs will vary depending on economies of scale, material costs, and on system conditions that occur each year, especially with the continued effects of the Covid-19 pandemic. The City is currently experiencing significant delays in the arrival of critical components for projects now under construction.

Planned capital projects for the 2023 through 2027 period are summarized below:

Distribution System		
1	Main Replacement for old main outside of the city	\$3,168,000
2	2023 Transite Replacement	\$2,250,000
3	2024 Transite Replacement	\$2,500,000
4	2025 Transite Replacement	\$2,750,000
5	2026 Transite Replacement	\$2,000,000
6	2027 Transite Replacement	\$2,000,000
7	Replace 8/10" Main on N. George Street Frederick Street to Landis Avenue	\$800,000
8	Large Diameter Main Phase 2 (Start of Construction)	\$12,703,239
9	Meter Replacement Program (Over 5 Years)	\$1,220,000

5.0 PROJECTED ANNUAL EXPENDITURES AND MEASURES TO ENSURE COST-EFFECTIVE PROJECT IMPLEMENTATION

Projected annual expenditures for each year from 2023 to 2027 are presented below. These annual expenditures are budget estimates and may vary depending on contractor bid prices and construction activity.

Year	Expenditure
2023	\$3,127,690
2024	\$4,177,690
2025	\$3,627,690
2026	\$2,877,690
2027	\$15,580,929.60

The City of Lancaster is committed to cost-effective construction practices and project implementation. Measures to ensure cost-effectiveness include:

1. A Comprehensive Planning Study was prepared in 2003, and has been updated annually thereafter, that examined all aspects of the City’s water treatment and distribution systems. Alternative improvement projects were identified and evaluated to address service capacity, pressure issues and operational issues associated with these systems. In addition, a new Facilities Plan is underway in 2022.
2. Individual feasibility studies are performed, where applicable, prior to project design. These studies ensure optimum and most up-to-date project designs.
3. Competitive bidding is used to obtain the best possible price for each project as required by Third-Class City Code.
4. On-going staff training provides the skills and knowledge required for correct equipment operation, preventative maintenance procedures, and making necessary repairs.
5. Qualified and experienced inspectors are employed to ensure conformance with the project plans and specifications. Inspectors require all projects are constructed and installed in accordance with AWWA, PADEP and Lancaster City requirements and standards.
6. Lancaster maintains contact with other utilities, municipalities, and agencies such as PennDOT to coordinate water system improvement projects with other related construction activities, such as road paving/resurfacing work. In addition, The City of Lancaster will continue its ongoing coordination of such projects including its work with the Pennsylvania Department of Transportation (PennDOT) to identify and to coordinate highway reconstruction projects.

As a result of these practices and procedures, Lancaster’s capital improvement program maximizes cost-effectiveness, while minimizing impacts on customer water service, business access, and traffic congestion.

Table 5-1 (see attached) provides LTIP expenditures by year.

6.0 ACCELERATION PLAN AND MAINTENANCE OF SAFE AND RELIABLE SERVICE

As the existing water systems age, replacement and renewal projects are expected to expand and accelerate over the next ten years.

The objectives of the proposed improvement program are to maintain and enhance customer service by addressing system needs, including pressure and flow capacity, fire flow availability, water quality, and emergency capabilities, such as operations during power failures. Projects are proposed that replace aging, problematic, or inadequate capacity infrastructure. As a result, unexpected infrastructure failures should be less likely and fewer emergency repairs and replacements should be required.

As noted above, Lancaster’s historic annual spending level from 2018 through 2021 was very high due to phase 1 of the large diameter transmission main and other large capital projects that are currently under construction. In addition, this period also had historic spending for our advanced metering infrastructure project, which was substantially completed in 2020. In total, \$22,830,069 was spent on the large diameter transmission main project as well as the advanced metering project. Over the past four (4) years, the city has replaced approximately three (3) miles of transite main. The City of Lancaster is planning to accelerate that to replace approximately 1.3 miles of main per year on a going forward basis. Which is approximately 6.3 miles of main over the next five (5) years.

Unexpected infrastructure failures, such as main breaks, can have a significant impact on customer water service when compared to scheduled maintenance work. Standard Lancaster procedures for scheduled maintenance include advance meetings with local township or borough officials to advise them regarding project activities. Customers, traffic, and other project impacts are presented and discussed at these meetings. Individual notifications to affected residences and businesses are provided in writing and by telephone.

In addition, emergency repairs usually are more costly than scheduled maintenance for replacing inadequate infrastructure. Therefore, accelerated implementation of the proposed improvement program will enhance system safety, reliability, and dependability of customer service, and provide for more cost-effective maintenance work.

Previous 5 Year Spending Totals	
Year	Expenditure
2018	\$3,824,182
2019	\$11,041,648
2020	\$9,738,394
2021	\$10,298,113
2022*	\$2,145,526

*Estimated

The previous five-year total spending came to an estimated \$37,047,863. Comparatively, the next five years of spending, as shown in Section 5 above, is scheduled to be \$29,391,690. This

may not look like an acceleration, but the previous five-year spend included a once in a hundred year Large Diameter Transmission Main, and a once every 25-30 year replacement of metering technology. The next five (5) years focuses more on main replacements.

Amounts of Eligible Property Replaced per Year in 2023-2027 LTIP

	2023	2024	2025	2026	2027
Services	246	326	246	246	246
Hydrants	17	21	17	18	27
Meters	2,441	2,441	2,441	2,441	2,441
Valves	44	75	44	44	63
Feet of Pipe	8,812	12,412	8,812	8,812	18,852

*Project types broken out in Table 5-1

Historical Amounts of Eligible Property Replaced per Year

	2018	2019	2020	2021	2022*
Services	54	273	103	178	150
Hydrants	0	11	11	11	0
Meters	8179	22267	1485	2017	2000
Valves	54	72	57	68	45
Feet of Pipe	5834	15895	21309	21200	7800

*Quantities for 2022 are estimated

7.0 WORKFORCE MANAGEMENT

Lancaster effectively and efficiently manages and conducts construction projects utilizing competitive bidding and an experienced and qualified engineering and inspection staff. Competitive bidding documents are searchable and available online via PENNBID. Advertisements are posted on the PennBid website, in the local newspaper, and on the City's website.

Lancaster's experienced engineering staff evaluates bids received for each project. The staff is familiar with the contractors who have historically bid on projects in the Lancaster area. Bids are evaluated on a cost basis.

Project management involves regular engineering review meetings during project design, and inspection by qualified inspectors during construction. The level of experience of Lancaster's inspectors is such that unsatisfactory work items can be identified and remediated before construction is completed. If necessary, inspectors require unacceptable work to be removed and reinstalled in accordance with project specifications.

8.0 OUTREACH AND COORDINATION WITH OTHER UTILITIES, PENNDOT, AND LOCAL GOVERNMENTS REGARDING PLANNED MAINTENANCE/ CONSTRUCTION PROJECTS AND ROADWAYS THAT MAY BE IMPACTED BY THE LTIP

The City states that it is in frequent contact with other utilities, municipalities, and agencies such as PennDOT to coordinate water system improvement projects with other related construction activities, such as road paving/resurfacing work. In addition, the City of Lancaster will continue its ongoing coordination of such projects including its work with the Pennsylvania Department of Transportation (PennDOT) and other municipalities to identify and to coordinate highway reconstruction projects.

Table 5-1 LTIP Expenditures by Year													
Project Designation & Description*							Total Cost	Estimated Annual Expenditure					
Improvement	Description	S	H	M	V	P		2023	2024	2025	2026	2027	
Main Replacement for old main outside of the city	Replacement of some portion of the water mains over 100 years old outside of the city. (Assuming a 10-year replacement of all 100 year old main)	330	21			53	~10,560	\$3,168,000.00	\$633,600.00	\$633,600.00	\$633,600.00	\$633,600.00	\$633,600.00
2023 Transite Pipe Replacement	\$2,000,000 allowance for replacement of AC Mains	180	13			33	~6,700	\$2,250,000.00	\$2,250,000.00				
2024 Transite Pipe Replacement	\$2,000,000 allowance for replacement of AC Mains	180	13			33	~6,700	\$2,500,000.00		\$2,500,000.00			
2025 Transite Pipe Replacement	\$2,000,000 allowance for replacement of AC Mains	180	13			33	~6,700	\$2,750,000.00			\$2,750,000.00		
2026 Transite Pipe Replacement	\$2,000,000 allowance for replacement of AC Mains	180	13			33	~6,700	\$2,000,000.00				\$2,000,000.00	
2027 Transite Pipe Replacement	\$2,000,000 allowance for replacement of AC Mains	180	13			33	~6,700	\$2,000,000.00					\$2,000,000.00
Replace 8/10" Main N. George Street 0 Frederick Street to Landis Avenue	Based on discussions with City staff, this main has had several repairs and ranks as #3 in desired replacement.	80	4			32	3,600	\$800,000.00		\$800,000.00			
Large Diameter Transmission Main Phase 2	Existing 25,100 l.f. of 42-inch steel pipe installed in 1955-1956; no redundancy in main (sole-source); City staff indicate breaks are occurring at water tap-ins and near/at elbows and other fittings.	0	10			20	10,040	\$12,703,239.60					\$12,703,239.60
Meter Replacement Program	replace meters during Radio Read Project			12,205				\$1,220,450.00	\$244,090.00	\$244,090.00	\$244,090.00	\$244,090.00	\$244,090.00
Total		1,310	100	12,205	270	57,700		\$29,391,689.60	\$3,127,690.00	\$4,177,690.00	\$3,627,690.00	\$2,877,690.00	\$15,580,929.60

*Note S=Services H=Hydrants M=Meters V=Valves P=Pipe Length

**Please Note Large Diameter Transmission main Phase 2 total cost is \$31,758,099. In this LTIP, we are only expected to do 40% of it.

EXHIBIT C



City of Lancaster – Bureau of Water
Lead Service Line Replacement Plan
May 31, 2023

1. Goals

This lead service line replacement plan (“LSLR Plan”) was developed by the City of Lancaster – Bureau of Water (“City”) to ensure compliance with the United States Environmental Protection Agency (“USEPA”), Pennsylvania Department of Environmental Protection (“PADEP”), and Pennsylvania Public Utility Commission’s (“PUC”) regulations and guidance on lead in drinking water and lead service lines (“LSLs”). These regulations were developed to address the health issues associated with lead in water. The goal of this LSLR Plan is to remediate all the LSLs within the City’s water system. The USEPA and PADEP recently revised the Lead and Copper Rule to require systematic replacement of LSLs over time. The regulations contain two replacement time frames. The USEPA requires all LSLs to be replaced over a thirty-three (33) year period, if water quality is in compliance with the Lead and Copper Rule. Whereas, the PUC requires replacement in thirty (30) year period. The City’s goal is to replace all LSLs in its PUC jurisdictional service territory in thirty (30) years.

2. Objectives

The City will replace both the privately-owned and City-owned portion of an LSL from the main to the curb stop on City--owned side, and from the curb stop into the building on the privately-owned side of the service line.

The City will file a LSL inventory by October 16, 2024, in accordance with the Revised Lead and Copper Rule. Until the inventory is complete the City will provide detailed information regarding the progress of its LSL inventory in accordance with Section 65.56 of the PUC’s regulations for LSLR plans.

3. Definitions

- a.* “Service lines” or “service line” means the pipe or pipes that connect(s) a water main to a building inlet and any fitting connected to the pipe or pipes.
- b.* “Lead service lines” or “lead service line” or “LSL” includes any service line made of lead, galvanized iron, or galvanized steel.
- c.* “Copper service lines” or “copper service line” includes any service line that is made of copper.

4. Processes and Procedures

The City has a current partial LSL inventory for the City-owned portion of service lines. There are currently approximately five hundred fifty (550) known LSLs within the City limits and

eighty-five (85) known LSLs in the City's PUC Jurisdictional Territory. Based on this preliminary inventory, and the City's resources, replacement per year would be:

- PUC Jurisdictional Territory – 5 per year
- Within City Limits – 25 per year

However, this replacement schedule is extremely preliminary as the City has no information on the privately-owned portion of its system. After the inventory is completed and submitted, pursuant to the 52 Pa. Code § 65.55, the City would be obligated to remove and replace all LSLs, whether City owned or customer owned within 30 years. Any service line in the inventory with an unknown material must be considered a LSL. It is estimated that 20% of the City's service area was installed after the Pennsylvania lead ban in 1991. The City currently has over 49,000 customer water accounts and of that number roughly eighty percent (80%), or 39,200 customer accounts, require identification of service line material. The City will need to budget funds to cover these investigations.

The City will cap its LSL replacements at fifty (50) per year in the PUC Jurisdictional Area.

Appendix B provides the Consent Order Form by which the customer (property owner) will authorize a LSL replacement. Appendix B also outlines the procedures for documenting refusal of, or failure to accept the City's offer to replace a privately-owned LSL. This authorization includes the disclosures required under 52 Pa. Code § 65.56(b)(10)(i)-(iii).

5. Inventory of Lead Service Lines

In recognition of the USEPA and PADEP regulatory requirements, the City will conduct an inventory of all service lines in its service territory. An inventory is required of all customer service lines, both the City-owned side of the service line as well as the privately-owned side of the service line. An accurate inventory is a critical part of the new Lead and Copper Rule, and the City will base its inventory on the following evidence-based records, methods, and/or techniques:

a. Curb Cards and Verification

The City has curb cards for its public system service lines. A curb card is an index card which shows the information on the privately-owned side of the service line. These cards date back to the 1910's, and have information including service line size, date of installation and material. According to PADEP guidance documents, the curb cards are not sufficient validation, alone, for a service line inventory, and they need to be verified by machine learning. However, the USEPA regulations require only one form of validation, which can include reliance on records. The City plans to use the curb cards for information on the privately-owned side of the service line. Predictive models can verify the accuracy of the curb cards and assist in identifying other LSLs.

b. Excavation

Excavation can also be used to check the curb cards as part of verification process when using predictive models. This means that there is a certain portion of a service line that will require excavation to corroborate the information on the curb card. The City will only excavate at the curb box because of the short distance from box to building entry in an urban environment. In areas outside of the City limits, there may be a need for separate points of verification along the same service line. The service lines that are found to be LSLs at the time of excavation may not be replaced at that time.

c. Inspections

On the privately-owned side of the service line, when there is a need to replace a water meter, or a building inspection by the City of Lancaster Codes Department is required, the City can inspect the service line at the meter or in the building basement to verify the material of the service line.

d. Customer-Provided Information

The City developed a Geographic Information System (“GIS”) application to assist in the identification of LSLs. Customers will be asked to identify their water line and take a picture of it so that City staff can verify the material of the incoming water line. The information will be entered into an online database. Public education will precede deployment of the GIS application.

6. Operation and Maintenance

a. Existing Corrosion Control Measures and Statistical Analysis of 2022 Lead Testing.

The City implements measures to protect customers from lead leaching into the water from service lines. The City uses a corrosion inhibitor called orthophosphate. In addition, pH is also controlled which helps prevent lead leaching. Analytical testing results demonstrate that this chemical works as no test results were above a trigger level or action level in the testing that was required every three (3) years under the existing Lead and Copper Rule. The testing is for the service lines containing lead, and the results indicated that lead levels are not in violation. The 90th percentile value is 9.9 ppb; the existing action level is 15 ppb.

b. Inspections

The City performs routine maintenance on its transmission and distribution system and routinely fixes main breaks. During the course of this work, the City may find LSLs. If the City finds a LSL, and the City is already excavating, the City will replace the LSL in accordance with Section 7 of this LSLR Plan.

c. Routine Maintenance

If a LSL is found on the privately-owned side of the service line, the line will need to be scheduled for replacement. The privately-owned side will require replacement before the City replaces its portion of the service line. The City will identify preapproved, qualified contractors with predetermined costs associated with LSL replacement. If the customer uses one of these preapproved, qualified contractors, replacement of the LSL will be completed at no cost to the customer. If the customer chooses to use a contractor that is not preapproved by the City, the City will not cover the costs of the replacement of the customer's LSL. The exception to this provision will be if the City directly contracts the LSL replacement as part of a neighborhood City project. In this case, the two-year warranty will still apply.

The City will investigate the City-owned portion of the service line if the customer chooses his or her own plumber. If the City-owned portion of the service line is found to contain lead, the City will replace its portion of the service line within ninety (90) days after the customer replaces their portion of the service line.

If a LSL is discovered on either the City-owned or privately-owned side of the service line, then the City will provide water filters to the customer that are capable of removing lead from water (NSF 53). The City will also provide the customer with a lead testing kit to determine the level of lead that may be in the customer's drinking water. It is the responsibility of the customer to accurately perform the test.

Once the customer-owned side of the service line has been replaced, the City will designate the City-owned portion of the service line for replacement. The City will continue to provide the customer with water filters until the City-owned portion of the service line has been replaced. The City will also continue to provide the customer with water filters after the replacement as set forth in Section 8.b of this LSLR Plan.

d. Meter Replacement

Meter replacements occur every twenty (20) years. If the City schedules a meter replacement and the service line coming into the home is determined to be a LSL, the replacement of the LSL is required. The City will test dig the City-owned side of the service line to determine if it is lead, if the material is otherwise unknown, but the privately-owned side must be replaced. The procedures in Section 7 of this LSLR Plan will apply.

e. Emergencies

The entire service line must be replaced under the LSL Rules if the service line is lead on both sides. If the City replaces its portion of the service line, and the private side is also lead, then the City will install a temporary water line until the customer has

replaced their service line. The customer will be required to sign the consent authorization in Appendix B. If the customer refuses to execute the consent, the water service will be terminated, following the City's shut off procedures.

7. System Replacements

a. Replacement Criteria

Once the service line inventory is complete, the City will need to replace the LSLs. It is anticipated that LSLRs will occur April 1st through October 31st. The replacement process for LSLs will comply with the requirements set forth by the PADEP, USEPA, and the PUC.

PUC regulations, 52 Pa. Code § 65.58(d), require a reimbursement to an eligible customer or property owner who replaced their LSL, within 1 year before or from LSLR project commencement. The City will use due diligence to identify property owners to obtain the appropriate consent, assisted by deeds and other historical property information maintained by the Lancaster County Property Assessment Office.

Service lines will be replaced as follows:

- *Lead on City-Owned Side and Lead on Privately-Owned Side (Full Line Replacement)*

The entire service line must be replaced under the PUC regulations if the service line is lead on both sides. If the City replaces its portion of the service line, and the private side is also lead, then the City will install a temporary water line until the customer has replaced their service line. The customer must contact a contractor from the City's list of preapproved, qualified contractors and arrange with the contractor to complete the work within four (4) weeks of the installation of the temporary service. Failure to do so will result in the temporary water service being shut off and the customer not having any water service until the privately-owned portion of the LSL is replaced and any other relevant requirements under the City's tariff for reconnection are satisfied.

- *Lead on the City-Owned Side and Copper on the Privately-Owned Side*

The customer may have previously replaced his or her portion of the service line with copper, or a copper service line may have been installed when the customer's property was built. If this is the case, the City will replace the City-owned portion of the LSL up to the existing copper service line. All the procedures associated with installation of a full service line replacement will be followed, but the customer will not need to replace their portion of the service line.

- *Copper on the City-Owned Side and Lead on the Privately-Owned Side*

If the City-owned portion of the service line is copper and the privately-owned portion is lead, the privately-owned portion must be replaced. The customer will need to replace his or her portion of the service line up to the City-owned portion of the service line. All the procedures associated with installation of a full service line replacement will be followed. The customer must contact a preapproved, qualified contractor from the City's list and arrange for the replacement to be completed within four (4) weeks of the installation of the temporary service. Failure to do so will result in the temporary water service being shut off and the customer not having any water service until the privately-owned portion of the LSL is replaced and any other relevant requirements under the City's tariff for reconnection are satisfied.

- *Copper on the City-Owned Side and on the Customer-Owned Side*

If both portions of the service line are copper, no replacement is required.

LSLs will be disposed of in accordance with PADEP regulations. The City does not anticipate recycling LSLs. However, if the lead can be recycled, any proceeds from such recycling would be returned to a "Miscellaneous Revenue" line in the City's annual water utility budget. The customer would not have any right to the proceeds of a recycled LSL

8. Post Replacement Measures

a. Notices and Instructions

Following a LSL replacement, the following steps will occur:

- i. The City will post an informational door hanger at the residence. The door hanger will inform the resident of the work done, instruct them how to flush pipes and taps, and direct the resident to collect a post-replacement water sample after allowing the water to sit unused for 6 to 8 hours;
- ii. Provide the household with a tap water sample kit;
- iii. If a partial LSL was performed, and the resident fails to return the water test sample and arrange for replacement of the privately-owned portion of the service line with a preapproved, qualified contractor from the City's list within two weeks, the City will give notice to the customer that it intends to shut off the temporary water service to the customer's property;
- iv. The City provides an additional free test to a customer when the customer's previous post-replacement tap water sample reveals lead levels above 10 ppb; and

- v. If a post-replacement sample shows water lead levels above 50 ppb, the City will deliver to the residence at least one (1) case of generally-available bottled water per day until the City completes a meter drop and flush at the residence. Residents who receive a meter drop and flush will remain eligible for additional water filter cartridges and other assistance as described above.

b. Water Filter Distribution

The City will offer a generally-available NSF-certified pitcher or tap filter and three (3) replacement cartridges to customers for six (6) months free of charge after a partial or full LSL replacement.

c. Testing

If a resident's post-replacement tap water lead test reveals lead levels above ten (10) ppb, the City will provide to the resident an additional testing kit, at no charge, and instructions to return a follow-up test result three (3) months after the initial test.

If the follow-up test result shows lead levels above ten (10) ppb, the City will assist the resident in determining why lead levels remain elevated.

If such further testing reveals lead levels above ten (10) ppb, the City will provide to the resident, at no charge, a generally-available NSF-certified water filter to remove lead, six (6) months of filter cartridges, and an additional tap water lead testing kit with instructions to return a follow-up test result three (3) months after the initial test.

d. Warranty

When the customer replaces the privately-owned LSL, the contractor that replaces it must provide a two (2) year warranty on workmanship and materials. This will be a part of the agreement that the City has with its preapproved, qualified contractors. The warranty will start on the date construction is completed and will be provided by the contractor. Maximum coverage will be for the cost of the installation. It is anticipated that the agreement will allow the contractor to remediate any deficiencies with the installation under the terms of the contract as City contracts require performance bonds.

9. Financial Considerations

The City anticipates that it will fund its LSLR Program with bond proceeds and/or PENNVEST loans or grants.

a. Financial Responsibility for Privately-Owned Service Line Replacements – PUC Jurisdictional Territory and City Limits

The City will cover the cost of replacement of a LSL if the customer uses the City's preapproved, qualified contractors and the customer resides in the City's PUC Jurisdictional Territory or within the City limits.

b. Reimbursement of LSL Replacements

If a LSL is found on the privately-owned side of the service line, the line will need to be scheduled for replacement. The City will identify preapproved, qualified contractors with predetermined costs associated with LSL replacement. If the customer uses one of these preapproved, qualified contractors, replacement of the LSL will be completed at no cost to the customer. If the customer chooses to use a contractor that is not preapproved by the City, the City will reimburse the customer provided:

- The City is provided an opportunity to inspect the customer's installation. The property owner or customer must provide the City notice a minimum of 72 hours' notice of the installation time.
- The property owner or customer reimburses the City for the cost of the inspector. Current inspection costs are \$89 per hour and will increase annually. The time for inspection is anticipated to be less than four (4) hours.
- The property owner or customer presents the City with the bill for reimbursement within 30 days of the installation's completion.
- The property owner or customer will be reimbursed using a City issued check for up to 100% of the cost of a similarly sized service line, with similar attributes of replacement at the property in the City's sole discretion. The City will determine the average cost of the installation using one of its pre-approved contractors to estimate the replacement cost.
- The City will issue the reimbursement via check.
- The City will issue the reimbursement check for eligible applications no later than one hundred eighty (180) days from receipt of the eligible application.

c. Cost Tracking of LSL Replacements

Within City Limits

The City will separately identify all projected LSL replacement costs and details on its budgets and audits.

PUC Jurisdictional Territory

The City will separately identify all projected LSL replacement costs and details on its cost projections in its rate filings. Actual costs will be included if known.

10. Customer Outreach and Communications

The PADEP and USEPA require the City to publish information on both the City-owned portion and the privately-owned portion of the service line. To accomplish this, the City requires assistance from its customers. The City will send out notifications and request that customers check their portion of the service line as it comes into their building or residence. This will require the customer to take a photograph for verification by City personnel. Please see **Appendix A** to this LSLR Plan for additional information.

The City will add a service line inventory to its website within twelve (12) months of PUC approval of this LSLR Plan that will include the following:

- An online tool describing the LSL replacement schedule by geographic location, at least six (6) months into the future;
- Information regarding the reimbursement requirements and a secure online tool that provides customers or property owners, if the customer is not the property owner, the ability to determine whether the customer or property owner may be eligible for reimbursement;
- Information that provides the ability to determine whether a property may have a LSL, delineating the known or reasonably anticipated material types or the City-owned and privately-owned portions of the service line and a method to request assistance to determine if the service line is a LSL;
- Information and resources relating to health risks associated with lead in water and LSLs, the status of efforts to replace the lines, and any community meetings.



APPENDIX A

CUSTOMER OUTREACH AND COMMUNICATIONS

IMPORTANT INFORMATION ABOUT LEAD IN YOUR DRINKING WATER

The City of Lancaster 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.

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 risk of heart disease, high blood pressure, kidney, or nervous system problems.

Lead is a chemical. It is used in many things, however, it was commonly used in paint in homes prior to the federal government's ban for such use in 1978. Lead-based paint becomes a concern when it chips, turns into dust, or gets into the soil. Lead enters drinking water primarily as a result of the corrosion, or wearing away, of materials containing lead in the water distribution system and household or building plumbing. These materials include lead-based solder used to join copper pipe, brass and chrome plated brass faucets, and in some cases, pipes made of lead that connect houses and buildings to water mains.

The pipe that connects your household plumbing to the water main in the street is called a service line. The City of Lancaster is replacing your service line because it either contains lead, is galvanized iron/steel and was or is currently downstream of lead, or there is a lead gooseneck, pigtail or connector on your service line. While it is important for the long term quality of your drinking water to remove these lead pipes, studies have shown that when lead service lines are disturbed, in the short-term they can release lead for weeks or months after the disturbance. This notice provides information you need to know regarding the replacement and why it is important. There are steps you can take to protect you and your family from exposure to lead in tap water which are explained below.

What should I do?

- After the service line is returned to service but before using the water for consumption, remove and clean all faucet aerators, flush your service line and all internal plumbing by opening all taps and letting the water run for at least 30 minutes, and re-install the cleaned aerators.
- To conserve water instead of simply running the water for 30 minutes, other household/non-potable water usage activities such as washing clothes, showering, flushing the toilet and running the dishwasher are effective methods of flushing the line.
- After the initial flush, run the water for 3-5 minutes before using and use cold water for cooking, preparing baby formula, and drinking to reduce your exposure to lead in the water. Boiling water does not reduce lead levels.
- In addition to flushing the lines, you are being provided with a pitcher filter that is certified to remove lead and six months of replacement cartridges. This filter may be used for water that will be used for drinking and cooking.
- Between 3 and 6 months after the line replacement, a tap water sample will be required. A tap water sample kit has been provided to you. Please follow the instructions for providing the sample including allowing 6-8 hours of letting the water sit unused, before filling the provided tap water sample kit.
- Adults should consider having the blood of any children living on the premises tested for lead.



Please share this information with all the other individuals who drink water at this location, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this notice in a public place or distributing copies by hand or mail.

For more information, call us at 717-291-4820, or visit our website at <https://www.cityoflanasterpa.gov/water/>.

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

As noted above, the City of Lancaster's system contains lead service lines and it is working to identify and replace all lead service lines. To request a copy of the City of Lancaster's current lead service line inventory, please contact us at the number provided above. We can also provide you with information on programs that provide financing solutions to assist property owners with replacement of their portion of a lead service line, including assisting you in determining if you are eligible for reimbursement or a no-cost replacement as part of the City of Lancaster's Pennsylvania Public Service Commission-approved Lead Service Line Replacement Program. The City of Lancaster is required to replace its portion of a lead service line when the property owner notifies them they are replacing their portion of the lead service line.

INFORMACIÓN IMPORTANTE SOBRE EL PLOMO EN SU AGUA POTABLE

La ciudad de Lancaster encontró niveles elevados de plomo en el agua potable de algunas casas/edificios. El plomo puede causar graves problemas de salud, especialmente a las mujeres embarazadas y los niños pequeños. Por favor lea atentamente esta información para saber qué puede hacer para reducir la presencia de plomo en su agua potable.

La exposición al plomo en el agua potable puede causar efectos graves para la salud en todos los grupos de edad. Los lactantes y los niños pueden presentar disminuciones del cociente intelectual y de la capacidad de atención. La exposición al plomo puede provocar nuevos problemas de aprendizaje y comportamiento o agravar los ya existentes. Los hijos de mujeres expuestas al plomo antes o durante el embarazo pueden tener un mayor riesgo de sufrir estos efectos adversos para la salud. Los adultos pueden tener mayor riesgo de padecer cardiopatías, hipertensión, problemas renales o del sistema nervioso.

El plomo es una sustancia química. Se utiliza en muchas cosas, sin embargo, se utilizaba comúnmente en la pintura de los hogares antes de que el gobierno federal prohibiera su uso en 1978. La pintura a base de plomo se convierte en un problema cuando se descascara, se convierte en polvo o penetra en el suelo. El plomo entra en el agua potable principalmente como resultado de la corrosión, o desgaste, de los materiales que contienen plomo en el sistema de distribución de agua y en las tuberías de los hogares o edificios. Entre estos materiales se encuentran las soldaduras con plomo utilizadas para unir tuberías de cobre, grifos de latón y latón cromado y, en algunos casos, tuberías de plomo que conectan casas y edificios a la red de suministro de agua.

La tubería que conecta la fontanería de su casa con la red de suministro de agua de la calle se llama línea de servicio.

La ciudad de Lancaster está reemplazando su línea de servicio, ya sea porque contiene plomo, es de hierro/acero galvanizado y estuvo o está actualmente aguas abajo de plomo, o hay un cuello de cisne de plomo, línea flexible o conector en su línea de servicio. Aunque la eliminación de estas tuberías de plomo es importante para la calidad del agua potable a largo plazo, los estudios han demostrado que cuando se alteran las tuberías de plomo, a corto plazo pueden liberar plomo durante semanas o meses después de la alteración. Este aviso le proporciona la información que necesita saber sobre la sustitución y por qué es importante. Hay medidas que puede tomar para protegerse a usted y a su familia de la exposición al plomo en el agua del grifo, que se explican a continuación.

¿Qué debo hacer?

- Después de volver a poner en servicio la línea de servicio, pero antes de utilizar el agua para el consumo, retire y limpie todos los aireadores de los grifos, purgue la línea de servicio y toda la fontanería interna abriendo todos los grifos y dejando correr el agua durante al menos 30 minutos, y vuelva a instalar los aireadores limpios.
- Para ahorrar agua, en lugar de simplemente dejar correr el agua durante 30 minutos, otras actividades domésticas/de uso de agua no potable, como lavar la ropa, ducharse, tirar de la cadena y poner el lavavajillas, son métodos eficaces para descargar la línea.
- Tras la purga inicial, deje correr el agua durante 3-5 minutos antes de usarla y utilice agua fría para cocinar, preparar la leche de fórmula y beber para reducir su exposición al plomo en el agua. Hervir el agua no reduce los niveles de plomo.
- Además de purgar las tuberías, se le proporciona un filtro de jarra certificado para eliminar el plomo y seis meses de cartuchos de repuesto. Este filtro puede utilizarse para el agua que se utilizará para beber y cocinar.
- Entre 3 y 6 meses después de la sustitución de la línea, se requerirá una muestra de agua del grifo. Se le ha proporcionado un kit de muestras de agua del grifo. Siga las instrucciones para



proporcionar la muestra, incluido el tiempo de 6 a 8 horas para dejar el agua sin usar antes de llenar el kit suministrado de muestras de agua del grifo.

- Los adultos deben considerar la posibilidad de someter a análisis de plomo la sangre de los niños que vivan en el lugar.

Por favor, comparta esta información con todas las demás personas que beban agua en este lugar, especialmente con aquellas que no hayan recibido este aviso directamente (por ejemplo, personas en apartamentos, residencias de ancianos, escuelas y empresas). Puede hacerlo colocando este aviso en un lugar público o distribuyendo copias a mano o por correo.

Para más información, llámenos al 717-291-4820, o visite nuestro sitio web en <https://www.cityoflanasterpa.gov/water/>.

Si desea más información sobre cómo reducir la exposición al plomo en su casa o edificio y sobre los efectos del plomo en la salud, visite el sitio web de la EPA en <http://www.epa.gov/lead> o póngase en contacto con su médico.

Como se ha señalado anteriormente, el sistema de la ciudad de Lancaster contiene líneas de servicio de plomo y está trabajando para identificar y sustituir todas las líneas de servicio de plomo. Para solicitar una copia del inventario actual de líneas de servicio de plomo de la ciudad de Lancaster, póngase en contacto con nosotros en el número facilitado anteriormente. También podemos proporcionarle información sobre los programas que ofrecen soluciones de financiación para ayudar a los propietarios con la sustitución de su parte de una línea de servicio de plomo, incluyendo la asistencia en la determinación de si usted es elegible para el reembolso o un reemplazo sin costo como parte del Programa de Reemplazo de Línea de Servicio con Plomo, aprobado por la Comisión de Servicios Públicos de Pennsylvania de la Ciudad de Lancaster. La ciudad de Lancaster está obligada a reemplazar su parte de una línea de servicio de plomo cuando el dueño de la propiedad notifica que está reemplazando su parte de la línea de servicio de plomo.



APPENDIX B
AUTHORIZATION FOR PRIVATE
LEAD SERVICE LINE REPLACEMENT



AUTHORIZATION FOR PRIVATE LEAD SERVICE LINE REPLACEMENT

The Bureau of Water of the City of Lancaster (“City”) is offering certain Property Owners replacement of their part of any lead service line (“LSL”) connected to the City’s water mains at no cost to the Property Owner under the City’s Lead Service Line Replacement Program (“LSLR Program”).

Under the City’s rules and regulations, the Property Owner owns and is responsible for the maintenance of the entire water line from the curb box to the premises being served by the City’s water service (a “private LSL”). As part of the LSLR Program, the City will replace private LSLs that are connected to its service lines. The City’s records reflect that the water service line from our water main to your home may be made of lead, or other materials containing lead such as brass or galvanized steel.. Whichever option you choose, the LSL must be replaced. If you desire to participate in the LSLR Program then you must complete this form per the instructions provided below.

A Property Owner, or the Property Owner’s legal representative, must provide authorization and consent to participate in the LSLR Program by signing this Authorization for Private LSL Replacement Form (“Form”). The following is a description of the responsibilities of the City and Property Owners who want to participate in the LSLR Program:

The City and/or any contractor(s) and other representative(s) that the City elects to utilize will need access to your Property to perform the work associated with the LSL replacement (“Replacement Work”). This Replacement Work includes access to the water meter inside your home, and involves: (i) shutting off your water service for approximately eight (8) hours; (ii) removing your existing LSL; replacing the LSL with a new copper service line (from the street to your home, and through your basement wall to the existing water meter); (iii) connecting the new service line to the City’s water main and flushing the new service line; (iv) re-seeding and/or re-mulching all turf areas disturbed as soon as practicable. Pavement areas disturbed will be replaced with similar pavement surfaces. The City will not be responsible for any damage to trees or landscaping affected by replacement of the LSL. Before beginning the Replacement Work, the City will notify you when its designated representatives will be on your Property to perform the Replacement Work. It is your responsibility to provide reasonable access and a working area for the City or its designated representatives at the service line and water meter location. An adult must be present at the Property when the Replacement Work is being done. The City and its designated representatives may continue to enter onto your Property until the Replacement Work is completed, and both you and the City have accept the completed work. The City and its designated representatives will suitably identify themselves prior to entering the Property.

YOUR RESPONSE TO THIS FORM IS REQUIRED: You must sign and submit this Form to participate in the LSLR Program. The City will not replace the private LSL on your Property without your authorization and consent. If you refuse to participate, and you choose to replace the



Private LSL at your own cost and expense, you must do so within one year of when the commencement of the work on the Property would have begun to be eligible for reimbursement.

If you do **NOT** wish to participate in the LSLR Program, you may decline using the option below. If you decline to participate in the LSLR Program, the City will **NOT** replace the private LSL on your Property. Your continued use of a LSL could have harmful effects. No level of lead in drinking water is safe, and the United States Department of Environmental Protection and Pennsylvania Department of Environmental Protection agree that lead in drinking water can cause serious health problems. It can cause damage to the brain and kidneys, and interfere with the production of red blood cells that carry oxygen to all parts of your body. The greatest risk of lead exposure is to infants, young children and pregnant women.

Please return this Form as soon as possible.

PLEASE RETURN THIS FORM AFTER COMPLETING THE APPROPRIATE SECTION ON THE FOLLOWING PAGE INDICATING WHETHER YOU AGREE TO PARTICIPATE IN THE LSLR PROGRAM OR DECLINE TO PARTICIPATE IN THE LSLR PROGRAM. A SELF-ADDRESSED ENVELOPE IS ENCLOSED.



APPROVAL FOR PRIVATE LSL REPLACEMENT

I **AGREE** and **CONSENT**, on my own behalf, and on behalf of all other persons who could claim by or through me, except for the express obligations in this Form, to release and hold harmless the City of Lancaster – Bureau of Water (the “City”) and its employees, agents, contractors, or representatives, and the City of Lancaster from any and all claims, causes of action, damages, or losses, of any nature whatsoever, that I may have with respect to the work authorized by this Form; it being acknowledged and agreed by me that I have accepted, voluntarily at no cost, the offer to participate in the LSLR Program, as offered by the City.

_____ Date: _____

(Signature of Property Owner)

_____ Address: _____
(Typed or Printed Name)

Please provide the contact information where you can be reached during normal business hours:

Phone: _____ Email: _____

DECLINE PRIVATE LSL REPLACEMENT

I **DECLINE** to have the City of Lancaster – Bureau of Water (the “City”) address my privately owned lead service line. I understand that lead is a toxic metal that can be harmful to human health even at low exposure levels. Lead is persistent, and it can bioaccumulate in the human body over time. All persons, especially, pregnant women, children, and infants, are vulnerable to the dangerous effects of lead in drinking water. For more information on the harmful effects of lead in drinking water please visit the following website maintained by the United States Environmental Protection Agency: <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>.

I understand that my refusal or failure to accept the City’s offer to replace my privately owned lead service line will **require** replacement of my Private LSL at **my expense** within one (1) year from the date when the commencement of the work on my Property would have begun in order for me to be eligible for reimbursement for the replacement of my Private LSL by the City.

I further understand that my refusal or failure to allow the City or its representative to replace my Private LSL, or my failure to replace my Private LSL concurrently with the City’s replacement of its portion of its service line if applicable, **will lead to termination of my water service** under the applicable provisions of the City’s currently-effective tariff, which is available on the internet at: <https://www.cityoflanasterpa.gov/wp-content/uploads/2019/08/City-of-Lancaster-Water-Tariff-Suppl.-No.-48-Effective-June-29-2022.pdf>.

_____ Date: _____
(Signature of Property Owner)

_____ Address: _____
(Typed or Printed Name)

Phone: _____ Email: _____



AUTORIZACIÓN PARA SUSTITUCIÓN DE LA LÍNEA DE SERVICIO DE PLOMO PRIVADA

La Oficina de Agua de la Ciudad de Lancaster ("Ciudad") está ofreciendo a ciertos Propietarios el reemplazo de su parte de cualquier línea de servicio de plomo ("LSL", por sus siglas en inglés) conectada a las tuberías principales de agua de la Ciudad sin costo alguno para el Propietario bajo el Programa de Reemplazo de Línea de Servicio de Plomo de la Ciudad ("Programa LSLR", por sus siglas en inglés).

De acuerdo con las normas y reglamentos de la Ciudad, el Propietario posee y es responsable del mantenimiento de toda línea de agua de la caja de la acera a los locales que son atendidos por el servicio de agua de la Ciudad (un "LSL privado"). Como parte del Programa LSLR, la Ciudad sustituirá los LSL privados que estén conectados a sus líneas de servicio. Los registros de la Ciudad reflejan que la línea de servicio de agua de nuestra red de agua a su casa puede ser de plomo, u otros materiales que contienen plomo como el latón o acero galvanizado. Sea cual sea la opción elegida, el LSL debe sustituirse. Si desea participar en el Programa LSLR, deberá completar este formulario siguiendo las instrucciones que figuran a continuación.

El Propietario, o su representante legal, debe dar su autorización y consentimiento para participar en el Programa LSLR firmando este Formulario de Autorización de Sustitución de LSL Privado ("Formulario"). A continuación se describen las responsabilidades de la Ciudad y de los Propietarios que deseen participar en el Programa LSLR:

La Ciudad y/o cualquier contratista(s) y otro(s) representante(s) que la Ciudad elija utilizar necesitarán acceso a su Propiedad para realizar el trabajo asociado con el reemplazo del LSL ("Trabajo de Reemplazo"). Este trabajo de sustitución incluye el acceso al medidor de agua dentro de su casa, e implica: (i) el corte de su servicio de agua durante aproximadamente ocho (8) horas; (ii) la eliminación de su LSL existente; la sustitución de la LSL con una nueva línea de servicio de cobre (de la calle a su casa, y a través de la pared del sótano hasta el medidor de agua existente); (iii) la conexión de la nueva línea de servicio a la red principal de agua de la Ciudad y el lavado de la nueva línea de servicio; (iv) resiembra y / o recolocación del acolchado de todas las áreas de césped perturbado tan pronto como sea posible. Las zonas de pavimento alteradas se sustituirán por superficies de pavimento similares. La Ciudad no será responsable de ningún daño a los árboles o al paisajismo afectado por la sustitución del LSL. Antes de comenzar el trabajo de sustitución, la Ciudad le notificará cuándo sus representantes designados estarán en su propiedad para realizar el trabajo de sustitución. Es su responsabilidad proporcionar un acceso razonable y un área de trabajo para la Ciudad o sus representantes designados en la línea de servicio y la ubicación del medidor de agua. Debe haber un adulto presente en el inmueble cuando se realicen las obras de sustitución. La Ciudad y sus representantes designados pueden seguir entrando en su Propiedad hasta que el Trabajo de Sustitución esté terminado, y tanto usted como la Ciudad hayan aceptado el trabajo terminado. La Ciudad y sus representantes designados se identificarán adecuadamente antes de entrar en la Propiedad.

SU RESPUESTA A ESTE FORMULARIO ES OBLIGATORIA: Debe firmar y enviar este formulario para participar en el Programa LSLR. La Ciudad no reemplazará el LSL privado en su Propiedad sin su autorización y consentimiento. Si se niega a participar y opta por sustituir el LSL Privado por su cuenta y cargo, deberá hacerlo en el plazo de un año a partir de la fecha en que hubieran comenzado los trabajos en el Inmueble para poder optar al reembolso.



Si **NO** desea participar en el Programa LSLR, puede renunciar utilizando la opción que figura a continuación. Si rechaza participar en el Programa LSLR, el Ayuntamiento **NO** sustituirá el LSL privado de su Propiedad. Su uso continuado podría tener efectos perjudiciales. Ningún nivel de plomo en el agua potable es seguro, y el Departamento de Protección del Ambiente de Estados Unidos y el Departamento de Protección del Ambiente de Pennsylvania coinciden en que el plomo en el agua potable puede causar graves problemas de salud. Puede causar daños en el cerebro y los riñones, e interferir en la producción de glóbulos rojos que transportan oxígeno a todas las partes del cuerpo. El mayor riesgo de exposición al plomo lo corren los lactantes, los niños pequeños y las mujeres embarazadas.

Por favor, devuelva este formulario lo antes posible.

DEVUELVA ESTE FORMULARIO DESPUÉS DE RELLENAR LA SECCIÓN CORRESPONDIENTE EN LA PÁGINA SIGUIENTE INDICANDO SI ACEPTA PARTICIPAR EN EL PROGRAMA LSLR O SI RECHAZA PARTICIPAR EN EL PROGRAMA LSLR. SE ADJUNTA UN SOBRE CON SU DIRECCIÓN.

APROBACIÓN DE LA SUSTITUCIÓN DE UN LSL PRIVADO

ACEPTO y CONSIENTO, en mi propio nombre, y en nombre de todas las demás personas que pudieran reclamar por mí o a través de mí, excepto por las obligaciones expresas en este Formulario, liberar y eximir de responsabilidad a la Ciudad de Lancaster - Oficina de Agua (la "Ciudad") y a sus empleados, agentes, contratistas o representantes, y a la Ciudad de Lancaster de cualquier y todo reclamo, causa de acción, daño o pérdida, de cualquier naturaleza, que yo pudiera tener con respecto al trabajo autorizado por este Formulario; siendo reconocido y acordado por mí que he aceptado, voluntariamente y sin costo alguno, la oferta de participar en el Programa LSLR, ofrecido por la Ciudad.

(Firma del propietario) Fecha: _____

(Nombre mecanografiado o en letra de molde) Dirección: _____

Indique los datos de contacto en los que se le puede localizar durante el horario laboral normal:

Teléfono: _____ Correo electrónico: _____

RECHAZO DE SUSTITUCIÓN LSL PRIVADA

RECHAZO que la Ciudad de Lancaster - Oficina de Aguas (la "Ciudad") se ocupe de mi línea de servicio de plomo de propiedad privada. Entiendo que el plomo es un metal tóxico que puede ser perjudicial para la salud humana incluso a bajos niveles de exposición. El plomo es persistente y puede bioacumularse en el cuerpo humano con el tiempo. Todas las personas, especialmente las mujeres embarazadas, los niños y los bebés, son vulnerables a los peligrosos efectos del plomo en el agua potable. Para más información sobre los efectos nocivos del plomo en el agua potable, visite el siguiente sitio web de la Agencia de Protección del ambiente de los Estados Unidos: <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>.

Entiendo que mi negativa o falta de aceptación de la oferta de la Ciudad para reemplazar mi línea de servicio de plomo de propiedad privada **requerirá** el reemplazo de mi LSL Privado a **mi cargo** dentro de un (1) año a partir de la fecha en que el inicio de las obras en mi Propiedad habría comenzado para que yo sea elegible para el reembolso por el reemplazo de mi LSL Privado por la Ciudad.

Asimismo, entiendo que mi negativa o falla en permitir que la Ciudad o su representante sustituyan mi LSL privada, o mi negativa a sustituir mi LSL privada simultáneamente con la sustitución por parte de la Ciudad de su parte de su línea de servicio, si procede, dará **lugar a la rescisión de mi servicio de agua** en virtud de las disposiciones aplicables de la tarifa actualmente en vigor de la Ciudad, que está disponible en Internet en: <https://www.cityoflancasterpa.gov/wp-content/uploads/2019/08/City-of-Lancaster-Water-Tariff-Suppl.-No.-48-Effective-June-29-2022.pdf>.

(Firma del propietario) Fecha: _____

(Nombre mecanografiado o en letra de molde) Dirección: _____

City of Lancaster Direct Testimony

Docket No. P-2023-_____

Witness: C. Volkay-Hilditch

CITY OF LANCASTER – BUREAU OF WATER

LANCASTER, PENNSYLVANIA

PETITION OF THE CITY OF LANCASTER – WATER BUREAU
FOR APPROVAL OF A LEAD SERVICE LINE REPLACEMENT PROGRAM
AND RELATED TARIFF CHANGES, PURSUANT TO 66 PA. C.S.A. § 1311(B) AND 52
PA. CODE §§ 65.51, ET SEQ.

Docket No. P-2023-_____

DIRECT TESTIMONY

OF

CHRISTINE VOLKAY-HILDITCH, P.E., BCEE
DEPUTY DIRECTOR OF PUBLIC WORKS

CITY OF LANCASTER

May 31, 2023

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DOCKET NO. P-2023-_____

DIRECT TESTIMONY OF CHRISTINE VOLKAY-HILDITCH

1 **I. Introduction & Purpose**

2 **1. Q. State your name and business address.**

3 A. My name is Christine Volkay-Hilditch. My business address is Lancaster City Hall,
4 120 North Duke Street, P.O. Box 1599, Lancaster, PA 17608-1599.

5 **2. Q. By whom are you employed?**

6 A. I am employed by the City of Lancaster, as the Deputy Director of Public Works,
7 Utilities.

8 **3. Q. Please state your education and experience.**

9 A. I am a graduate of Villanova University with a Bachelor's degree in Civil
10 Engineering. I also obtained a Master's of Civil Engineering/Water and Wastewater
11 concentration from Northeastern University, and a Master's of Public
12 Administration from Villanova University. I am a registered professional engineer
13 in the Commonwealth of Pennsylvania, a diplomate of the Environmental
14 Engineering Academy, and a Pennsylvania Department of Environmental
15 Protection ("PADEP") licensed water operator and wastewater operator.

16 **4. Q. Please describe your job responsibilities.**

17 A. I serve as the City's Deputy Director of Public Works, Utilities. In this capacity, I
18 am in responsible charge of the City's two drinking water plants and its advanced
19 wastewater treatment plant. My responsibilities are utility management, including
20 supervision of operations, maintenance, engineering, and laboratory functions,

1 budgeting, personnel management, training, and capital planning. Prior to my
2 employment with the City, I served as the Director of Engineering for the Delaware
3 County Regional Control Authority’s (“DELCORA”) 44 million gallon per day
4 wastewater treatment plant for 13 years. My responsibilities were similar,
5 concentrating on utility engineering management. Prior to DELCORA, I worked
6 for the City of Reading as the Environmental Division Manager and for Acer
7 Engineers and Consultants as a project manager.

8 **5. Q. What is the purpose of your Direct Testimony?**

9 A. The purpose of my Direct Testimony is to address the City of Lancaster – Water
10 Bureau’s (the “City”) Lead Service Line Replacement (“LSLR”) Plan, for which I
11 am the sponsoring witness. The LSLR Plan has been submitted by the City as
12 Exhibit B to its Petition filed with the Pennsylvania Public Utility Commission
13 (“Commission”) requesting approval of an LSLR Program, including the LSLR
14 Plan and the implementation of tariff changes authorizing the replacement of
15 customer-owned¹ lead service lines (“LSLs”).

16 **II. The City’s LSLR Plan**

17 **6. Q. Please describe the contents of the City’s LSLR Plan.**

18 A. The City’s LSLR Plan addresses the three issues enumerated 52 Pa. Code § 65.56,
19 which is a section of the Commission’s Rules and Regulations related to
20 implementation and evaluation of requests under 66 Pa. C.S.A. § 1311(b) (the “LSL
21 Rules”), and the many subcomponents of those issues. The three issues are: (1)
22 service line inventory; (2) planning and replacements; and (3) communications,

¹ The customer-owned portion of the service line is also sometimes referred to herein and in the City’s LSLR Plan as “privately-owned”.

1 outreach, and education.

2 A. Service Line Inventory.

3 **7. Q. Can you explain how the City will proceed with completing its service line**
4 **inquiry?**

5 A. The LSL Rules require the City to complete a service line inventory that complies
6 with the United States Environmental Protection Agency’s (“EPA”) regulations at
7 40 C.F.R. 141.1 to 143.20. The City is utilizing several methods and procedures
8 endorsed by the EPA to complete its service line inventory, including: (1) using
9 curb cards and machine learning, (2) excavation, and (3) inspections.

10 **8. Q. What are curb cards?**

11 A. Curb cards are index cards that show information on customer-owned LSLs. These
12 cards date back to the 1910’s and contain information concerning the service line
13 size, date of installation, and materials used. PADEP guidance documents indicate
14 that curb cards, alone, are not sufficient to validate the existence of a LSL. The
15 EPA regulations require only one form of validation—which can include reliance
16 on records like curb cards. In the absence of curb cards, or where only some curb
17 cards are available, PADEP’s guidance notes that information regarding service
18 lines may be validated by computer or predictive modeling

19 **9. Q. What is “predictive modelling?”**

20 A. According to the PADEP’s “lead and Copper Rule Service Line Inventory Operator
21 Training (ref 2023 v4), computer or predictive modeling looks for patterns in data
22 to develop rules or algorithms. These models use attributes from known service
23 line material at specific locations to make inferences about unknown locations. The

1 models compile several layers of data and then estimate the probability that a
2 service line is lead. In addition, the EPA has issued guidance that expressly permits
3 water systems to “create a strategy that involves proactive investigation of service
4 line material compositions which is independent of other water system activities,
5 such as the use of predictive models to evaluate the probability a service line is lead
6 and other methods provided or required by the state. Such predictive models could
7 also inform water systems in how they can approach LSLR in a more efficient
8 manner.” *See* 86 Fed. Reg. 4212 (Jan. 15, 2021). The City intends to utilize the
9 services of a consulting engineer to develop predictive models for its LSL inventory
10 to identify LSLs where appropriate.

11 **10. Q. How will excavation assist the City in completing its service line inventory?**

12 A. Excavation can be used to verify the presence of a LSL, to verify the information
13 contained on a curb card or other historical document, and in conjunction with the
14 predictive modeling process. In short, a portion of a service line is excavated and
15 examined to corroborate the information on a curb card or because the line material
16 is unknown. If excavation is necessary, the City will only excavate at the curb box
17 because of the short distance from the box to building entry in an urban
18 environment. In rural or suburban areas additional excavation may be required at
19 other points on the same service line, which could be very costly and is thus not
20 preferred.

21 **11. Q. Please detail how inspections will assist the City in completing its service line
22 inventory?**

23 A. If the need arises for the City to replace a water meter or a building inspection by

1 the City of Lancaster Codes Department is necessary, the City can inspect the
2 service line at the meter or in the building's basement during this pre-arranged visit
3 to verify the material of the service line. This avoids the issues that sometimes arise
4 in terms of access to the premises that could otherwise inhibit the City's ability to
5 timely and easily obtain this information with customer cooperation.

6 B. Planning and Replacements.

7 **12. Q. What will the City's projected annual investment in its LSLR Program be?**

8 A. To start, approximately \$135,000.00.

9 **13. Q. How will the City fund or finance the LSLR Program?**

10 A. The City will utilize a combination of bond proceeds and PENNVEST loans and
11 grants to fund the LSLR Program

12 **14. Q. Will the City have a cap on the number of LSLRs it completes in a year?**

13 Yes. The City will cap LSLRs at fifty (50) per calendar year in its PUC
14 Jurisdictional Area.

15 **15. Q. Approximately how many LSLRs will the City aim to complete each calendar
16 year, and how was that determination made?**

17 A. The City projects that it can complete thirty (30) total LSLRs throughout its entire
18 service territory each calendar year with currently available resources. Twenty-five
19 (25) of these LSLRs will be within City limits and the remaining five (5) will be in
20 the PUC Jurisdictional Area. These projections were developed based on the City's
21 preliminary service line inventory, which (to date) has revealed eighty-five (85)
22 City-owned LSLs in the PUC Jurisdictional Area and five hundred fifty (550) City-
23 owned LSLs within the City of Lancaster's limits. A target of thirty (30) LSLRs

1 per year will allow the City to complete all anticipated LSLs within the thirty (30)
2 year time frame set forth by the LSL Rules.

3 **16. Q. Did the City rely on any assumptions in developing the procedures for its**
4 **LSLR Plan?**

5 A. Yes. The City has assumed that where there the City-owned portion of the service
6 line is lead, galvanized material requiring replacement, or unknown, that the
7 customer-owned LSL will require replacement approximately 40% of the time.
8 Hence, the City assumes that the eighty-five (85) currently identified City-owned
9 LSLs in the PUC Jurisdictional Area there are approximately thirty-four (34)
10 corresponding customer-owned LSLs requiring replacement.

11 **17. Q. What criteria did the City consider when developing its LSLR schedule?**

12 A. The City based its schedule on its available finances and capital planning initiatives.
13 The City is likely to prioritize LSLRs in Lancaster Township, to start. Based on the
14 information that the City has gathered to date, that portion of the PUC Jurisdictional
15 Area has a higher percentage of LSLs. The recent perfluoroalkyl and
16 polyfluoroalkyl substances (“PFAS”) regulations have caused additional regulatory
17 challenges. The issue of affordability is important while ensuring that the City
18 meets its commitment to its customers to provide quality drinking water.

19 **18. Q. Does the City’s LSLR Plan include processes and procedures to address**
20 **emergency repairs or replacements which reveal LSLs?**

21 A. Yes. In the event that the City is addressing an emergent repair or replacement and
22 determines that the property is served by a LSL, the City will replace the City-
23 owned portion of the LSL and install a temporary water line until the customer has

1 replaced the customer-owned portion of the LSL. Thereafter, the procedure will
2 adhere to the City's normal procedure for customer-owned LSLRs, as set forth in
3 Section 7 of the City's Proposed LSLR Plan.

4 **19. Q. Has the City developed processes and procedures to obtain acceptance of a**
5 **customer-owned LSL prior to project commencement?**

6 A. Yes. The City has prepared a form, included as Appendix B to the City's Proposed
7 LSLR Plan (**Exhibit B** to the City's Petition) to be completed by the Property
8 Owner to either agree to a LSLR or decline the City's offer of an LSLR. In the
9 event that the customer is not the property owner (*e.g.*, the customer is renting the
10 property), the City will use all due diligence to identify and contact the property
11 owner in order to obtain a definitive answer concerning participation in the LSLR
12 Program. The City will also rely upon deed or other historical property ownership
13 information maintained by the Lancaster County Property Assessment Office to
14 determine the identity of the property owner.

15 **20. Q. Please explain the process when a customer accepts a LSLR for a customer-**
16 **owned LSL.**

17 A. When a customer accepts the City's offer for a LSLR, the City will have the
18 customer schedule for a replacement. The customer will select a contractor to
19 perform the LSLR from the City's list of preapproved, qualified contractors. If the
20 customer selects a contractor from the City's list, the LSLR will be performed at
21 no cost to the customer. Once the customer-owned LSL is replaced, the City will
22 designate its portion of the LSL for replacement. Throughout the period of LSL
23 replacement, the City will provide the customer with water filters capable of

1 removing lead from water (NSF 53) and will also provide the customer with a lead
2 testing kit to determine the level of lead that may be in the customer’s drinking
3 water. Following a LSLR, the City will provide the customer with literature
4 instructing them how to flush pipes and taps, provide tap water test/sample kit, and
5 instructions on how to use that kit.

6 **21. Q. How will the City recycle or otherwise dispose of LSLs, and what does the City**
7 **plan to do with the proceeds from those recycling and/or disposal efforts?**

8 A. The City will dispose of LSLs in accordance with PADEP regulations. The City
9 does not anticipate profiting from disposing of LSLs. The City does not anticipate
10 recycling LSLs. However, if the lead or other materials can be recycled, the
11 proceeds from such recycling would be returned to a “Miscellaneous Revenue” line
12 in the City’s annual water utility budget. The customer would not have any right
13 to the proceeds of a recycled LSL.

14 **22. Q. Please describe how the City plans to replace both City-owned LSLs and**
15 **COLSLs?**

16 A. The City will create a list of preapproved, qualified contractors to perform all
17 LSLRs under the LSLR Plan. The City will vet each contractor to ensure that
18 industry-standard practices and materials are utilized.

19 **23. Q. Has the City developed a procedure for documenting the refusal of, or failure**
20 **to accept, the City’s offer to replace a customer-owned LSL?**

21 A. Yes. The City has prepared a form, included as Appendix B to the City’s Proposed
22 LSLR Plan (**Exhibit B** to the City’s Petition) that a customer can complete to
23 indicate that they are refusing the City’s offer of a LSLR. The form includes a

1 statement of the known health hazards from the continued use of a LSL and further
2 advises that refusal or failure to accept the City’s offer of replacement will require
3 the customer to replace the customer-owned LSL, at the property owner’s expense,
4 within one (1) year from the City’s LSLR project commencement for the customer
5 or property owner to be eligible for reimbursement. The form further notifies the
6 customer that failure to allow the City to complete replacement of the customer-
7 owned LSL contemporaneously with the replacement of any City-owned LSL will
8 result in termination of water service to the property under the applicable provisions
9 of the City’s tariff.

10 C. Customer Communication, Outreach and Education.

11 **24. Q. Can you explain how the City will communicate with customers, conduct**
12 **outreach, and educate customers on the LSLR Program and the potential**
13 **hazards associated with lead in drinking water?**

14 A. The City will provide notice to those customers it serves with a customer-owned
15 LSL made of lead, galvanized material requiring replacement, or an unknown
16 material in the form set forth in Appendix A of the City’s LSLR Plan (**Exhibit B**
17 to the City’s Petition). The Notice will advise customers of the health risks
18 associated with lead in drinking water, provide information about opportunities to
19 replace LSLs, and steps that customers can take to reduce exposure to lead in
20 drinking water.

21

1 **III. Conclusion**

2 **25. Q. Would the Commission’s adoption of the City’s LSLR Program be in the**
3 **public interest?**

4 A. Yes, unequivocally. It is beyond dispute at this point that lead in drinking water
5 poses a health risk. Approval of the City’s LSLR Program will allow the City to
6 address this issue, comply with applicable federal and Pennsylvania law, and ensure
7 that customers who may not be able to independently finance replacement of a
8 customer-owned LSL can secure that replacement through participation in the
9 City’s LSLR Program.

10 **26. Q. Does this conclude your Direct Testimony?**

11 A. Yes, it does.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of The City of Lancaster – Water :
Bureau for Approval of A Lead Service Line : **Docket No. P-2023-_____**
Replacement Program and Related Tariff :
Changes, Pursuant to 66 Pa. C.S.A. § 1311(b) :
and 52 Pa. Code §§ 65.51, et seq :

VERIFICATION

I, Christine Volkay-Hilditch, P.E., BCEE, Deputy Director of Public Works, Utilities for the City of Lancaster am authorized to make this verification on behalf of the Petitioner in this matter, the City of Lancaster – Bureau of Water, and hereby state that the facts set forth in the Petition and my Direct Testimony 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.A. § 4904 (relating to unsworn falsifications to authorities).



Christine Volkay-Hilditch, P.E., BCEE
Deputy Director of Public Works, Utilities
City of Lancaster

Dated : May 31, 2023

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of The City of Lancaster – Water :
Bureau for Approval of A Lead Service Line : **Docket No. P-2023-_____**
Replacement Program and Related Tariff :
Changes, Pursuant to 66 Pa. C.S.A. § 1311(b) :
and 52 Pa. Code §§ 65.51, et seq :

CERTIFICATE OF SERVICE

I, Courtney L. Schultz, hereby certify that a true and correct copy of The City of Lancaster’s
Petition in connection with the above-referenced docket was served on the following individuals
on this 31st day of May, 2023, as indicated below.

PA PUC

Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

Rosemary Chiavetta, Secretary
rchiavetta@pa.gov

TUS

Paul Diskin, Director
pdiskin@pa.gov

Daniel Searfoorce, Manager
dsearfoorc@pa.gov

John Van Zant, Supervisor
jvanzant@pa.gov

OSBA

NazAarah Sabree
Small Business Advocate
Ra-sba@pa.gov

Theresa Wagner
Executive Director
tereswagne@pa.gov

I&E

Allison Kaster, Esq.
Deputy Chief Prosecutor
Richard Kanaskie
akaster@pa.gov
rkanaskie@pa.gov

OCA

PA Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923

Patrick M. Cicero
pcicero@pa.gov

Christine Hoover
choover@pa.gov

Prior Rate Case Participants

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1113 Sunwood Lane
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AWRenna@comcast.net

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Lancaster, PA 17601
dkitz@comcast.net

Robert Arters
4 Blueberry Circle
Lancaster, PA 17602
rdarters@yahoo.com

/s/ Courtney L. Schultz
Courtney L. Schultz, Esq.
Counsel for Petitioner
The City of Lancaster-Water Bureau

EXHIBIT 2
CUSTOMER-SIDE LSLR CONSENT FORM



AUTHORIZATION FOR PRIVATE LEAD SERVICE LINE REPLACEMENT

The Bureau of Water of the City of Lancaster (“City”) is offering certain Property Owners replacement of their part of any lead service line (“LSL”) connected to the City’s water mains at no cost to the Property Owner under the City’s Lead Service Line Replacement Program (“LSLR Program”).

Under the City’s rules and regulations, the Property Owner owns and is responsible for the maintenance of the entire water line from the curb box to the premises being served by the City’s water service (a “private LSL”). As part of the LSLR Program, the City will replace private LSLs that are connected to its service lines. The City’s records reflect that the water service line from our water main to your home may be made of lead, or other materials containing lead such as brass or galvanized steel. Whichever option you choose, the LSL must be replaced. If you desire to participate in the LSLR Program then you must complete this form per the instructions provided below.

A Property Owner, or the Property Owner’s legal representative, must provide authorization and consent to participate in the LSLR Program by signing this Authorization for Private LSL Replacement Form (“Form”). The following is a description of the responsibilities of the City and Property Owners who want to participate in the LSLR Program:

The City and/or any contractor(s) and other representative(s) that the City elects to utilize will need access to your Property to perform the work associated with the LSL replacement (“Replacement Work”). This Replacement Work includes access to the water meter inside your home, and involves: (i) shutting off your water service for approximately eight (8) hours; (ii) removing your existing LSL; replacing the LSL with a new copper service line (from the street to your home, and through your basement wall to the existing water meter); (iii) connecting the new service line to the City’s water main and flushing the new service line; (iv) re-seeding and/or re-mulching all turf areas disturbed as soon as practicable. Pavement areas disturbed will be replaced with similar pavement surfaces. The City will not be responsible for any damage to trees or landscaping affected by replacement of the LSL. Before beginning the Replacement Work, the City will notify you when its designated representatives will be on your Property to perform the Replacement Work. It is your responsibility to provide reasonable access and a working area for the City or its designated representatives at the service line and water meter location. An adult must be present at the Property when the Replacement Work is being done. The City and its designated representatives may continue to enter onto your Property until the Replacement Work is completed, and both you and the City have accepted the completed work. The City and its designated representatives will suitably identify themselves prior to entering the Property.

YOUR RESPONSE TO THIS FORM IS REQUIRED: You must sign and submit this Form to participate in the LSLR Program. The City will not replace the private LSL on your Property without your authorization and consent. If you refuse to participate, and you choose to replace the



Private LSL at your own cost and expense, you must do so within one year of when the commencement of the work on the Property would have begun to be eligible for reimbursement.

If you do **NOT** wish to participate in the LSLR Program, you may decline using the option below. If you decline to participate in the LSLR Program, the City will **NOT** replace the private LSL on your Property. Your continued use of a LSL could have harmful effects. No level of lead in drinking water is safe, and the United States Department of Environmental Protection and Pennsylvania Department of Environmental Protection agree that lead in drinking water can cause serious health problems. It can cause damage to the brain and kidneys, and interfere with the production of red blood cells that carry oxygen to all parts of your body. The greatest risk of lead exposure is to infants, young children and pregnant women.

Please return this Form as soon as possible.

PLEASE RETURN THIS FORM AFTER COMPLETING THE APPROPRIATE SECTION ON THE FOLLOWING PAGE INDICATING WHETHER YOU AGREE TO PARTICIPATE IN THE LSLR PROGRAM OR DECLINE TO PARTICIPATE IN THE LSLR PROGRAM. A SELF-ADDRESSED ENVELOPE IS ENCLOSED.



APPROVAL FOR PRIVATE LSL REPLACEMENT

I **AGREE** and **CONSENT**, on my own behalf, and on behalf of all other persons who could claim by or through me, except for the express obligations in this Form, to release and hold harmless the City of Lancaster – Bureau of Water (the “City”) and its employees, agents, contractors, or representatives, and the City of Lancaster from any and all claims, causes of action, damages, or losses, of any nature whatsoever, that I may have with respect to the work authorized by this Form; it being acknowledged and agreed by me that I have accepted, voluntarily at no cost, the offer to participate in the LSLR Program, as offered by the City.

_____ Date: _____

(Signature of Property Owner)

_____ Address: _____

(Typed or Printed Name)

Please provide the contact information where you can be reached during normal business hours:

Phone: _____ Email: _____

DECLINE PRIVATE LSL REPLACEMENT

I **DECLINE** to have the City of Lancaster – Bureau of Water (the “City”) address my privately owned lead service line. I understand that lead is a toxic metal that can be harmful to human health even at low exposure levels. Lead is persistent, and it can bioaccumulate in the human body over time. All persons, especially, pregnant women, children, and infants, are vulnerable to the dangerous effects of lead in drinking water. For more information on the harmful effects of lead in drinking water please visit the following website maintained by the United States Environmental Protection Agency: <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>.

I understand that my refusal or failure to accept the City’s offer to replace my privately owned lead service line will **require** replacement of my Private LSL at **my expense** within one (1) year from the date when the commencement of the work on my Property would have begun in order for me to be eligible for reimbursement for the replacement of my Private LSL by the City.

I further understand that my refusal or failure to allow the City or its representative to replace my Private LSL, or my failure to replace my Private LSL concurrently with the City’s replacement of its portion of its service line if applicable, **will lead to termination of my water service** under the applicable provisions of the City’s currently-effective tariff, which is available on the internet at: <https://www.cityoflanasterpa.gov/wp-content/uploads/2019/08/City-of-Lancaster-Water-Tariff-Suppl.-No.-48-Effective-June-29-2022.pdf>.

_____ Date: _____
(Signature of Property Owner)

_____ Address: _____

(Typed or Printed Name)

Phone: _____ Email: _____

**AUTORIZACIÓN PARA
SUSTITUCIÓN DE LA LÍNEA DE SERVICIO DE PLOMO
PRIVADA**

La Oficina de Agua de la Ciudad de Lancaster ("Ciudad") está ofreciendo a ciertos Propietarios el reemplazo de su parte de cualquier línea de servicio de plomo ("LSL", por sus siglas en inglés) conectada a las tuberías principales de agua de la Ciudad sin costo alguno para el Propietario bajo el Programa de Reemplazo de Línea de Servicio de Plomo de la Ciudad ("Programa LSLR", por sus siglas en inglés).

De acuerdo con las normas y reglamentos de la Ciudad, el Propietario posee y es responsable del mantenimiento de toda línea de agua de la caja de la acera a los locales que son atendidos por el servicio de agua de la Ciudad (un "LSL privado"). Como parte del Programa LSLR, la Ciudad sustituirá los LSL privados que estén conectados a sus líneas de servicio. Los registros de la Ciudad reflejan que la línea de servicio de agua de nuestra red de agua a su casa puede ser de plomo, u otros materiales que contienen plomo como el latón o acero galvanizado. Sea cual sea la opción elegida, el LSL debe sustituirse. Si desea participar en el Programa LSLR, deberá completar este formulario siguiendo las instrucciones que figuran a continuación.

El Propietario, o su representante legal, debe dar su autorización y consentimiento para participar en el Programa LSLR firmando este Formulario de Autorización de Sustitución de LSL Privado ("Formulario"). A continuación se describen las responsabilidades de la Ciudad y de los Propietarios que deseen participar en el Programa LSLR:

La Ciudad y/o cualquier contratista(s) y otro(s) representante(s) que la Ciudad elija utilizar necesitarán acceso a su Propiedad para realizar el trabajo asociado con el reemplazo del LSL ("Trabajo de Reemplazo"). Este trabajo de sustitución incluye el acceso al medidor de agua dentro de su casa, e implica: (i) el corte de su servicio de agua durante aproximadamente ocho (8) horas; (ii) la eliminación de su LSL existente; la sustitución de la LSL con una nueva línea de servicio de cobre (de la calle a su casa, y a través de la pared del sótano hasta el medidor de agua existente); (iii) la conexión de la nueva línea de servicio a la red principal de agua de la Ciudad y el lavado de la nueva línea de servicio; (iv) resiembra y / o recolocación del acolchado de todas las áreas de césped perturbado tan pronto como sea posible. Las zonas de pavimento alteradas se sustituirán por superficies de pavimento similares. La Ciudad no será responsable de ningún daño a los árboles o al paisajismo afectado por la sustitución del LSL. Antes de comenzar el trabajo de sustitución, la Ciudad le notificará cuándo sus representantes designados estarán en su propiedad para realizar el trabajo de sustitución. Es su responsabilidad proporcionar un acceso razonable y un área de trabajo para la Ciudad o sus representantes designados en la línea de servicio y la ubicación del medidor de agua. Debe haber un adulto presente en el inmueble cuando se realicen las obras de sustitución. La Ciudad y sus representantes designados pueden seguir entrando en su Propiedad hasta que el Trabajo de Sustitución esté terminado, y tanto usted como la Ciudad hayan aceptado el trabajo terminado. La Ciudad y sus representantes designados se identificarán adecuadamente antes de entrar en la Propiedad.

SU RESPUESTA A ESTE FORMULARIO ES OBLIGATORIA: Debe firmar y enviar este formulario para participar en el Programa LSLR. La Ciudad no reemplazará el LSL privado en su Propiedad sin su autorización y consentimiento. Si se niega a participar y opta por sustituir el LSL Privado por su cuenta y cargo, deberá hacerlo en el plazo de un año a partir de la fecha en que hubieran comenzado los trabajos en el Inmueble para poder optar al reembolso.



Si **NO** desea participar en el Programa LSLR, puede renunciar utilizando la opción que figura a continuación. Si rechaza participar en el Programa LSLR, el Ayuntamiento **NO** sustituirá el LSL privado de su Propiedad. Su uso continuado podría tener efectos perjudiciales. Ningún nivel de plomo en el agua potable es seguro, y el Departamento de Protección del Ambiente de Estados Unidos y el Departamento de Protección del Ambiente de Pennsylvania coinciden en que el plomo en el agua potable puede causar graves problemas de salud. Puede causar daños en el cerebro y los riñones, e interferir en la producción de glóbulos rojos que transportan oxígeno a todas las partes del cuerpo. El mayor riesgo de exposición al plomo lo corren los lactantes, los niños pequeños y las mujeres embarazadas.

Por favor, devuelva este formulario lo antes posible.

DEVUELVA ESTE FORMULARIO DESPUÉS DE RELLENAR LA SECCIÓN CORRESPONDIENTE EN LA PÁGINA SIGUIENTE INDICANDO SI ACEPTA PARTICIPAR EN EL PROGRAMA LSLR O SI RECHAZA PARTICIPAR EN EL PROGRAMA LSLR. SE ADJUNTA UN SOBRE CON SU DIRECCIÓN.

APROBACIÓN DE LA SUSTITUCIÓN DE UN LSL PRIVADO

ACEPTO y CONSIENTO, en mi propio nombre, y en nombre de todas las demás personas que pudieran reclamar por mí o a través de mí, excepto por las obligaciones expresas en este Formulario, liberar y eximir de responsabilidad a la Ciudad de Lancaster - Oficina de Agua (la "Ciudad") y a sus empleados, agentes, contratistas o representantes, y a la Ciudad de Lancaster de cualquier y todo reclamo, causa de acción, daño o pérdida, de cualquier naturaleza, que yo pudiera tener con respecto al trabajo autorizado por este Formulario; siendo reconocido y acordado por mí que he aceptado, voluntariamente y sin costo alguno, la oferta de participar en el Programa LSLR, ofrecido por la Ciudad.

(Firma del propietario) Fecha: _____

(Nombre mecanografiado o en letra de molde) Dirección: _____

Indique los datos de contacto en los que se le puede localizar durante el horario laboral normal:

Teléfono: _____ Correo electrónico: _____

RECHAZO DE SUSTITUCIÓN LSL PRIVADA

RECHAZO que la Ciudad de Lancaster - Oficina de Aguas (la "Ciudad") se ocupe de mi línea de servicio de plomo de propiedad privada. Entiendo que el plomo es un metal tóxico que puede ser perjudicial para la salud humana incluso a bajos niveles de exposición. El plomo es persistente y puede bioacumularse en el cuerpo humano con el tiempo. Todas las personas, especialmente las mujeres embarazadas, los niños y los bebés, son vulnerables a los peligrosos efectos del plomo en el agua potable. Para más información sobre los efectos nocivos del plomo en el agua potable, visite el siguiente sitio web de la Agencia de Protección del ambiente de los Estados Unidos: <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>.

Entiendo que mi negativa o falta de aceptación de la oferta de la Ciudad para reemplazar mi línea de servicio de plomo de propiedad privada **requerirá** el reemplazo de mi LSL Privado a **mi cargo** dentro de un (1) año a partir de la fecha en que el inicio de las obras en mi Propiedad habría comenzado para que yo sea elegible para el reembolso por el reemplazo de mi LSL Privado por la Ciudad.

Asimismo, entiendo que mi negativa o falla en permitir que la Ciudad o su representante sustituyan mi LSL privada, o mi negativa a sustituir mi LSL privada simultáneamente con la sustitución por parte de la Ciudad de su parte de su línea de servicio, si procede, dará **lugar a la rescisión de mi servicio de agua** en virtud de las disposiciones aplicables de la tarifa actualmente en vigor de la Ciudad, que está disponible en Internet en: <https://www.cityoflancasterpa.gov/wp-content/uploads/2019/08/City-of-Lancaster-Water-Tariff-Suppl.-No.-48-Effective-June-29-2022.pdf>.

(Firma del propietario) Fecha: _____

(Nombre mecanografiado o en letra de molde) Dirección: _____

Teléfono: _____ Correo electrónico: _____