



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120
September 10, 2025

IN REPLY PLEASE
REFER TO OUR FILE

Docket No. A-2025-3054442
Utility Code 212285

ERIN K FURE ESQUIRE
PENNSYLVANIA-AMERICAN WATER COMPANY
852 WESLEY DRIVE
MECHANICSBURG PA 17055
ERIN.FURE@AMWATER.COM

RE: Application of Pennsylvania-American Water Company for approval, *nunc pro tunc*, of the right to offer, render, furnish, and supply water service to the public in additional portions of Gilberton Borough and West Mahanoy, Ryan and New Castle Townships, Schuylkill County, Pennsylvania at Docket No. A-2025-3054442

Dear Attorney Fure:

On April 7, 2025, Pennsylvania-American Water Company (PAWC) filed the above-captioned document (Application) with the Pennsylvania Public Utility Commission (Commission). For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

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

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

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

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

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

Signature _____
Title _____
Date _____

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

In addition, to expedite completion of the review, please send a copy of the response to Susan Johnson, in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at suejohnso@pa.gov. Please also direct any questions to Susan Johnson at telephone number (717) 783-5946. Thank you in advance for your cooperation.

Sincerely,



Matthew L. Homsher
Secretary

Enclosure: TUS Data Request Set 3

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

TUS Data Request Set 3

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

- A-26. Please confirm whether Gilberton Borough, West Mahanoy Township, Ryan Township and New Castle Township each have mandatory connection ordinances for water service.
- A-27. In response to Data Request A-19, PAWC provided maps that depicted the location or route of PAWC's water facilities in the Requested Territory areas. However, the maps do not depict any water service facilities in Areas 2 or 4. Additionally, in response to Data Request A-22-b, PAWC provided Revised A-5_Attachment which listed the water facilities for each Requested Territory area. In Revised A-5_Attachment, PAWC indicated there were no water facilities in Areas 2 and 4. This provided information makes it unclear how *nunc pro tunc* water service is being provided in Areas 2 and 4. Please provide the following:
- a. An explanation of how *nunc pro tunc* water service is being provided in Areas 2 and 4 without any water facilities (i.e., owned by the customer, company, and/or others); and
 - b. An explanation of how water is being conveyed to Areas 2 and 4 including the identification of the water supply source's owner.
- A-28. In response to Data Request A-20-a, PAWC provided a list of addresses and parcel numbers for its existing customers in all the Requested Territory Areas. However, the map for the Requested Territory for Area 4 (Requested Area 4 Map) provided in PAWC's response to Data Request A-19 appears to encompass one or more parcels that are not identified in PAWC's response to Data Request A-20-a. Also, in Paragraph 12 of the Application, PAWC stated that Area 4 serves the Gilberton Power Plant, which is only supplied by the Schuylkill County Municipal Authority (SCMA) Interconnection. However, the Requested Area 4 Map does not depict the location or route of any PAWC's water facilities between the SCMA Interconnection and the Gilberton Power Plant. For the Requested Territory for Area 4, please provide the following:
- a. A depiction and description of all the water facilities (i.e., owned by the customer, company, and/or others) that provide service from the SCMA Interconnection to the Gilberton Power Plant;
 - b. A revised requested territory map that depicts a contiguous land area encapsulating only the property parcel for the existing customer in the Requested Territory for Area 4 that was identified in response to Data Request A-20-a and that depicts and labels the location or route of all PAWC's water facilities for the Requested Territory in Area 4, along with the elevations of the major facilities; and

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- c. A bearing and angles description of this revised area along with the land area quantified in acres.
- A-29. The map for the Requested Territory for Area 1 provided in response to Data Request A-19 appears to encompass one or more parcels that are not identified in PAWC's response to Data Request A-20-a. Also, PAWC's Requested Territory provided in the Application's Exhibit B-1 appears to include a portion of Butler Township, Schuylkill County. For the Requested Territory for Area 1, please provide the following:
- a. A revised requested territory map that depicts a contiguous land area encapsulating only the property parcels for the existing customers in the Requested Territory for Area 1 that were identified in response to Data Request A-20-a and the area of any public right-of-way that fronts these parcels and that is located between PAWC's existing service territory and the property parcels;
 - b. A bearing and angles description of this revised area along with the land area quantified in acres; and
 - c. Confirm that PAWC's revised requested territory map does not include any areas in Butler Township, Schuylkill County.
- A-30. The map for the Requested Territory for Area 2 provided in PAWC's response to Data Request A-19 appears to encompass one or more parcels that are not identified in PAWC's response to Data Request A-20-a. For the Requested Territory for Area 2, please provide the following:
- a. A revised requested territory map that depicts a contiguous land area encapsulating only the property parcels for the existing customers in the Requested Territory for Area 2 that were identified in response to Data Request A-20-a and the area of any public right-of-way that fronts these parcels and that is located between PAWC's existing service territory and the property parcels; and
 - b. A bearing and angles description of this revised area along with the land area quantified in acres.
- A-31. In response to Data Request A-2, PAWC provided copies of the Subdivision Plans for Laurel Ridge. For each Requested Territory area, please provide the following:
- a. Copies of all developer's agreements entered into for the extension of water facilities; and
 - b. The total amount of contributions in aid of construction received by PAWC for the extension of water facilities.

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A-32. In response to Data Request A-8-e, PAWC provided a copy of the SCMA Water Purchase Agreement (1993 Water Agreement) dated March 17, 1993. Please provide evidence that PAWC filed the 1993 Water Agreement with the Commission in accordance with Section 507 of the Pennsylvania Public Utility Code, 66 Pa.C.S. § 507.