



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

September 15, 2025

IN REPLY PLEASE  
REFER TO OUR FILE

Docket No. A-2025-3055966  
Utility Code 212285

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

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

Dear Attorney Fure:

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

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

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

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

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

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

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

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

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

Sincerely,



Matthew L. Homsher  
Secretary

Enclosure: TUS Data Request Set 3

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

### TUS Data Request Set 3

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

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

- A-18. In response to TUS Data Request A-16(a), PAWC provided a breakdown of Prior Phase Facilities. However, the breakdown of Phase 3's cost breakdown did not include meter costs or sizes in the breakdown, contained a discrepancy in the hydrant count, and totaled \$578,231.50 rather than \$575,066.50 as noted above the breakdown. Also, Phase 4's breakdown did not include meter costs or sizes and provided no cost detail by major plant account. Please provide a revised Response to Data Request A-16(a) with the full breakdown of the Prior Phase Facility quantities, sizes, materials, and costs by major plant account.
- A-19. In response to TUS Data Request A-16(d), PAWC did not provide a revised response to Data Request A-3. Please provide a revised response to TUS Data Request A-3, detailing the estimated quantities, sizes and costs of water meters to be installed by PAWC in the proposed territory and the Prior Phases, and explain how PAWC will fund meter installation costs (e.g., internally generated funds, short-term debt, etc.).
- A-20. In response to TUS Data Request A-16(d), PAWC did not provide a revised response to TUS Data Request A-5. Please provide a revised response to TUS Data Request A-5, including a revised Exhibit K that addresses Phases 3 and 4.
- A-21. In response to TUS Data Request A-16(d), PAWC did not provide a revised response to TUS Data Request A-7. Please provide a revised response to TUS Data Request A-7, identifying if any permits are required for the Prior Phase Facilities. If so, please provide the estimated costs, state if these costs were included in the estimated total project cost, identify the entity responsible for obtaining these permits and applicable sources of funding.
- A-22. In response to TUS Data Request A-16(d), PAWC did not provide a revised response to TUS Data Request A-8. Please provide a copy of the most recent approved subdivision plans for Phases 3 and 4.
- A-23. In response to TUS Data Request A-16(d), PAWC did not provide a revised response to TUS Data Request A-9. Please provide a revised response to TUS Data Request A-9 with an updated estimate of the refund to be paid by PAWC to the Developer for the residential customers of Phases 3 and 4.
- A-24. TUS Data Request A-15(c) requested that PAWC clarify why it is necessary or proper for PAWC to be certificated to serve the additional requested territory area in Area 2 that is outside of Phase 5. PAWC's response indicated that in order to achieve maximum available fire flow in Phase 5, improve service reliability and mitigate water quality issues, it was necessary to run an eight-inch main on Gudenkunst Road. However, this response does not identify why it is necessary or proper for PAWC to be certificated to

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serve the additional requested territory area in Area 2 that is outside of Phase 5. Please clarify why it is necessary and proper to be certificated to serve the additional requested territory area in Development Phases 3 and 4 (e.g., the Development's Phases 3 and 4 require public water service and other properties may request public water service as needed).

A-25. Please provide an updated average daily demand for the requested territory to include Phases 3 and 4.