



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120
September 19, 2025

IN REPLY PLEASE
REFER TO OUR FILE

Docket No. P-2023-3044459
Utility Code 210104

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RE: Petition of Aqua Pennsylvania, Inc. for Approval of its Lead Service Line Replacement Program at Docket No. P-2023-3044459

Dear Attorneys Hassell, Lent and Rulli:

On November 27, 2023, Aqua Pennsylvania, Inc. (Aqua) filed the above-captioned document with the Pennsylvania Public Utility Commission (Commission). For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

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

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

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

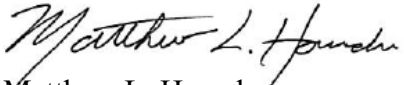
Please note your answers must be verified per 52 Pa. Code § 1.36. Accordingly, you must provide the following statement with your responses:

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 Matthew T. Lamb, P.E., in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at mlamb@pa.gov. Please also direct any questions to Matthew Lamb at telephone number (717) 783-1001. Thank you in advance for your cooperation.

Sincerely,

Matthew L. Homsher
Secretary

Enclosure: TUS Data Request Set 2

- cc: Darryl Lawrence, Office of Consumer Advocate (w/enclosure), ra-oca@paoca.org
- Melanie El Atieh, Office of Consumer Advocate (w/enclosure), melatieh@paoca.org
- Harrison Breitman, Office of Consumer Advocate (w/enclosure), hbreitman@paoca.org
- NazAarah Sabree, Office of Small Business Advocate (w/enclosure), ra-sba@pa.gov
- Steven Gray, Office of Small Business Advocate (w/enclosure), sgray@pa.gov
- Allison Kaster, Bureau of Investigation & Enforcement (w/enclosure), akaster@pa.gov
- Alexander Stahl, Aqua Pennsylvania, Inc. (w/enclosure), astahl@aquaamerica.com
- John Sweet, PA Utility Law Project (w/enclosure), jsweet@pautilitylawproject.org
- Ria Pereira, PA Utility Law Project (w/enclosure), rpereira@pautilitylawproject.org
- Elizabeth Marx, PA Utility Law Project (w/enclosure), emarx@pautilitylawproject.org
- Lauren Berman, PA Utility Law Project (w/enclosure), lberman@pautilitylawproject.org
- Devin Ryan, Post and Schell PC (w/enclosure), dryan@postschell.com

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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.

- P-11. Attachment 1 of Aqua's May 9, 2025, filing at this docket included a copy of Aqua's amended long-term infrastructure improvement plan (Modified LTIP) with Aqua's updated lead service line replacement plan (LSLR Plan) provided as the Modified LTIP's Attachment A. The Modified LTIP's Table 18 identified 288 projected lead service line replacements (LSLRs) for customer-owned lead service lines (COLSLs) for 2023. However, the LSLR Plan's Table 2 specified 500 projected LSLRs for COLSLs for 2023. Also, Aqua's 2023 Annual Asset Optimization Plan filed with the Commission on March 5, 2024, at Docket No. M-2024-3047064, identified in Attachment A that Aqua replaced 288 COLSLs in 2023. Please confirm whether Aqua is proposing to change the number of projected LSLRs for 2023 under its long-term infrastructure improvement plan (2024 LTIP) approved by Commission Order entered June 13, 2024, at Docket No. P-2023-3043755.
- P-12. If Aqua is proposing to change the number of projected LSLRs for COLSLs for 2023 under its 2024 LTIP, provide a revised Modified LTIP, Table 18 that reflects this change.
- P-13. If Aqua is not proposing to change the number of projected LSLRs for COLSLs for 2023 under its 2024 LTIP, provide a revised LSLR Plan, Table 2 that is consistent with the Modified LTIP's Table 18.
- P-14. Confirm that Aqua's Modified LTIP includes Aqua's current claims and projections for eligible property.
- P-15. The Modified LTIP's Table 13 identified 434,910 Aqua-owned service lines as of October 2023. Also, the LSLR Plan's Table 1 identified 470,024 Aqua-owned and customer-owned service lines across Aqua's service territory. Thus, it appears that Aqua's LSLR Plan may include service lines for water distribution systems that were acquired by Aqua after the 2024 LTIP was filed with the Commission. Pursuant to 52 Pa. Code § 65.56(b)(9), Aqua's LSLR Plan must include a detailed explanation of how Aqua's acquisition of water distribution systems will be integrated into Aqua's efforts to complete LSLRs throughout its water distribution systems. Please provide responses for each of the following:
- a. Explain the discrepancy between the number of Aqua-owned service lines in the Modified LTIP's Table 13 and the LSLR Plan's Table 1;
 - b. Identify each acquired water distribution system that is included in Aqua's LSLR Plan that is not also included in Aqua's 2024 LTIP, if applicable, or state that there are no acquired water distribution systems;

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- c. If Aqua intends to include acquired water distribution systems in its LSLR Plan that are not also included in its long-term infrastructure improvement plan, provide a revised LSLR Plan, Section II.B.9 that includes a statement that indicates that except to the extent necessary to implement Aqua's LSLR Plan, Aqua's long-term infrastructure improvement plan does not apply to acquired water distribution systems and does not include eligible property for acquired water distribution systems; and
 - d. Clarify that Aqua does not intend to incorporate its newly acquired water distribution systems into its Amended LTIIP as filed on 5/9/2025.
- P-16. The LSLR Plan's Exhibits A1 and A2 included copies for pre-investigative letters that included the statements, "The service line extends from the water main in the street to your water meter. Aqua will install the new service line and you will own and maintain the new service line as a part of your property." However, the LSLR Plan's Exhibit A3 included a copy of a pre-investigative letter that included the statement, "The service line extends from the water main in the street to your water meter. Aqua owns the portion of the service line from the main in the street to the curb stop or edge of right of way (Aqua Service Line). You own the portion of the service line from the curb stop or edge of right of way through your property and into your structure (Customer Service Line). Aqua will install the new service line and dedicate back to you the Customer Service Line and you will own and maintain the new Customer Service Line as a part of your property." Please provide a revised LSLR Plan, Exhibits A1 and A2 to replace the identified statements in Exhibits A1 and A2 with the identified statement in Exhibit A3.
- P-17. Attachment 2 of Aqua's May 9, 2025, filing at this docket included a copy of Aqua's tariff supplement filed in compliance with Ordering Paragraph 4 of the Commission's Order entered April 10, 2025 (April 2025 Order), at this docket. This tariff supplement included an issued date of May 9, 2025, and an effective date of May 10, 2025. Pursuant to 52 Pa. Code § 53.101, public utilities are prohibited from filing tariff supplements on less than notice of 60 days unless first receiving special permission from the Commission. Also, Ordering Paragraph 5 of the Commission's April 2025 Order directed the Commission's Bureau of Technical Utility Services (TUS) to complete its review of the filed tariff supplement and submit an Order for Commission consideration. Please provide a revised Attachment 2 to replace Aqua's tariff supplement with a pro forma tariff supplement for TUS's review pursuant to the April 2025 Order.
- P-18. Pursuant to 52 Pa. Code § 65.62(c), where a customer or property owner, if the customer is not the property owner, refuses, or fails to accept, an entity's offer to replace a customer-owned LSL, the entity shall replace the entity-owned portion of the LSL in accordance with the entity's LSLR plan and terminate service in accordance with the entity's tariff. Also, the LSLR Plan's Section II.B.10 indicated, "During a LSLR project connected to a main replacement or where the Company service line needs to be replaced, if the resident/property owner refuses to replace, and the Company has either made contact with the resident/property owner and they refuse, or where the

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resident/property owner is non-responsive to the Company's requests as described in Section II.B.5 to replace the COLSL, Aqua will initiate termination procedures." Please provide a revised Attachment 2 that includes tariff language that would allow Aqua to implement the termination procedures described in the LSLR Plan's Section II.B.10 for a customer or property owner, if the customer is not the property owner, that refuses, or fails to accept, Aqua's offer to replace a customer-owned LSL.