



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

October 8, 2025

IN REPLY PLEASE
REFER TO OUR FILE

Docket No. R-2025-3057687
Utility Code 212285

KENNETH M KULAK ESQUIRE
MARK A LAZAROFF ESQUIRE
MORGAN LEWIS & BOCKIUS LLP
222 MARKET STREET
PHILADELPHIA PA 19103-3007
KEN.KULAK@MORGANLEWIS.COM
MARK.LAZAROFF@MORGANLEWIS.COM

RE: Pennsylvania-American Water Company Supplement No. 55 to Tariff Water-PA P.U.C.
No. 5 at Docket No. R-2025-3057687

Dear Attorneys Kulak and Lazaroff:

On September 23, 2025, Pennsylvania-American Water Company (PAWC) filed the above-captioned document (Tariff Supplement Filing) 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 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 Paul Zander, in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at pzander@pa.gov. Please also direct any questions to Paul Zander at telephone number (717) 783-1372. Thank you in advance for your cooperation.

Sincerely,



Matthew L. Homsher
Secretary

Enclosure: TUS Data Request Set 1

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
Rebecca Lyttle, Office of Small Business Advocate (w/enclosure), relyttle@pa.gov
Allison Kaster, Bureau of Investigation & Enforcement (w/enclosure), akaster@pa.gov

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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.

- R-1. PAWC's Tariff Supplement Filing included a cover letter that indicated that on September 18, 2025, PAWC filed materials in support of Supplement No. 55 to Tariff Water-PA P.U.C. No. 5 (Supplement No. 55) that inadvertently omitted Supplement No. 55, and that PAWC was submitting Supplement No. 55 with its September 23, 2025 cover letter. Also, Supplement No. 55 included an issued date of September 18, 2025, and an effective date of November 17, 2025. However, pursuant to 52 Pa. Code §§ 53.101-53.103, public utilities are prohibited from filing any tariff, revision, or supplement on less than 60 days' notice, unless the public utility first receives special permission from the Commission to do so. Considering that Supplement No. 55 was filed with the Commission on September 23, 2025, instead of September 18, 2025, please clarify whether PAWC is seeking permission from the Commission to allow Supplement No. 55 to be filed with the Commission on 55 days' notice or a similar waiver of Commission regulations pursuant to 52 Pa. Code § 1.91.
- R-2. PAWC's response for 52 Pa. Code § 53.52(a)(10) specified that bill messages will identify the reason for future bill adjustments related to PAWC's proposed PFAS Litigation Universal Credit Rider (PFAS Rider). Please provide an example of a PAWC customer bill that includes PAWC's projected adjustment and PAWC's anticipated bill message.
- R-3. PAWC's response for 52 Pa. Code § 53.52(b)(2) included a per books income statement for PAWC's water and wastewater operations. However, pursuant to 52 Pa. Code § 53.52(d), if a utility renders more than one type of public service, required supporting data relates solely to the kind of service to which the tariff supplement is applicable. Please provide an operating income statement for PAWC for a 12-month period, the end of which may not be more than 120 days prior to the filing, which relates solely to PAWC water service.
- R-4. Supplement No. 55, Page 40 included provisions for PAWC's PFAS Rider that indicated that if proceeds remain from a disbursement due to rounding or a fluctuation in PAWC's customer count between the date the credit is calculated and when credits are issued to customers, those proceeds will be transferred by PAWC to its H2O Help to Others Program and used to fund customer Hardship Grants. Please explain how PAWC plans to track proceeds received and funds transferred, including any related interest or income for the period between when proceeds are received to when funds are transferred, to ensure that all proceeds and related interest or income are returned to PAWC's customers.
- R-5. PAWC's PFAS Rider indicated that PAWC will credit customers proceeds from the PFAS litigation (net of attorneys' fees and costs) through bill credits within a reasonable time after PAWC receives payment of such funds. Additionally, PAWC's supporting data filed with the Commission on September 26, 2025, included a statement of reasons

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- (Statement of Reasons) that indicated that using the PFAS Rider would eliminate the need to determine any interest on PFAS Funds because they will be distributed to customers quickly following receipt. Please confirm that any interest or other income earned on PFAS Funds will be included in PAWC's PFAS Credit or explain why it is just and reasonable to exclude interest and other income earned on PFAS Funds from PAWC's PFAS Credit.
- R-6. Please specify the maximum number of days after PAWC's receipt of proceeds from PFAS Litigation by which PAWC will provide customers those proceeds.
- R-7. PAWC's Statement of Reasons specified that because of certain settlements, PAWC has received approximately \$5.4 million in settlement payments and that PAWC expects to receive additional compensation from ongoing litigation. Please specify each date that PAWC received a settlement payment, or state that PAWC has not received and will not receive any settlement payments before Supplement No. 55's effective date.
- R-8. Please provide a calculation of the total accrued interest on settlement payments between the dates that PAWC received settlement payments and November 17, 2025, assuming that accrued interest is computed monthly at the residential mortgage lending rate specified by the Secretary of Banking in accordance with the Loan Interest and Protection Law, 41 P.S. §§ 101, *et seq* (i.e., the interest rate that applies for overcollections for PAWC's distribution system improvement charge).
- R-9. Please specify when PAWC will distribute to customers all settlement payments received before Supplement No. 55's effective date (e.g., X days after Supplement No. 55's effective date, on a date certain, etc.).
- R-10. Supplement No. 55, Page 40 indicated that no more than ten days after issuing credits to customer accounts, PAWC shall report to the Commission the amount of the credit, including a workpaper showing the calculation of the credit. Please provide an example of PAWC's proposed workpaper showing the calculation of the credit using data from the Tariff Supplement Filing.
- R-11. Please clarify whether PAWC will separately identify the following information in each workpaper showing the calculation of each PFAS Credit: (1) the amount of proceeds from PFAS litigation before deductions for attorneys fees and costs; (2) the amount of attorneys fees and costs; (3) the total active water customer count; and (4) the date of the credit calculation.
- R-12. Supplement No. 55, Page 40 did not include a proposed value for PFAS Credit or a proposed credit issuance date that may be updated through future filings as credits are issued. For example, when PAWC files tariff supplements for its distribution system improvement charge with the Commission, those tariff supplements change an existing percentage value in PAWC's tariff and the date of the rate change is based on an effective date identified in the tariff supplement, whereas the PFAS Rider does not clearly provide

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similar language that can be updated to provide the current value for PFAS Credit or the related credit calculation date. Please provide a copy of a *pro forma* tariff supplement that includes the tariff language that PAWC will use in its next tariff supplement for its PFAS Rider to define the amount of the rate and the date of the credit calculation.

- R-13. It appears that Page 40 of PAWC's water tariff that was available on its website on October 8, 2025, at <https://amwater.com/paaw/Resources/PDF/Rates/paaw-water-tariff-10-2025.pdf> included a copy of a credit rider that was similar to Supplement No. 55, but that included certain different provisions, such as for workpapers to be filed before issuing credits rather than after issuing credits and for proceeds remaining from a disbursement to be used to fund customer hardship grants. Please provide responses for each of the following:
- a. Please provide a copy of Page 40 of PAWC's water tariff that was available on its website on October 8, 2025, at <https://amwater.com/paaw/Resources/PDF/Rates/paaw-water-tariff-10-2025.pdf>;
 - b. Confirm that PAWC did not revise Page 40 of its water tariff between the effective date of rates from PAWC's rate case at Docket No. R-2023-3043189 and the date of the Tariff Supplement Filing; and
 - c. Confirm that PAWC has updated Page 40 of its water tariff that is available on its website to conform with its Tariff Supplement Filing.