

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of Pennsylvania-American Water :
Company under Sections 1102(a) and 1329 of :
the Pennsylvania Public Utility Code, 66 Pa :
C.S. §§ 1102(a) and 1329, for approval of (1) the :
transfer, by sale, to Pennsylvania-American Water :
Company, of substantially all of the assets, :
properties and rights related to the wastewater :
system owned and operated by the East Coventry :
Township, and (2) the rights of Pennsylvania- :
American Water Company to begin to offer or :
furnish wastewater service to the public in the :
Township of East Coventry, Chester County, :
Pennsylvania :

Docket No. A-2025-3053487

**DIRECT TESTIMONY OF
MICHAEL J. GUNTRUM, P.E. ON BEHALF OF
PENNSYLVANIA-AMERICAN WATER COMPANY**

Date: October 8, 2025

PAWC Statement No. 2

**DIRECT TESTIMONY OF
MICHAEL J. GUNTRUM**

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE RECORD.**

2 **A.** My name is Michael J. Guntrum, P.E., and my business address is 852 Wesley Drive,
3 Mechanicsburg, PA 17055.

4

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 **A.** I am employed by Pennsylvania-American Water Company (“PAWC”) as a Senior Project
7 Engineer for the Business Development Department.

8

9 **Q. WHAT ARE YOUR RESPONSIBILITIES AS A SENIOR PROJECT ENGINEER?**

10 **A.** As a Senior Project Engineer for PAWC, I am responsible for the performance of due
11 diligence activities related to potential water and wastewater acquisitions in the
12 Commonwealth of Pennsylvania.

13

14 **Q. PLEASE DESCRIBE YOUR PROFESSIONAL EDUCATION AND EXPERIENCE.**

15 I received my Bachelor of Science (B.S.) degree in civil engineering in 1994 and a Master
16 of Engineering degree (M.E.) in Environmental Engineering in 1995 from the University
17 of Idaho. In 2010, I received my Master’s in Business Administration (MBA) from
18 Lebanon Valley College. I have worked in various engineering roles and have over 30
19 years of experience in environmental engineering related to municipal and industrial water
20 and wastewater treatment. I have worked at PAWC since 2003 in roles related to the
21 acquisition of water and wastewater facilities. I am a registered Professional Engineer in
22 Pennsylvania.

1 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PENNSYLVANIA**
2 **PUBLIC UTILITY COMMISSION (“COMMISSION”)?**

3 **A.** Yes. I have testified before the Commission on several occasions, including both water
4 and wastewater proceedings. A list of proceedings is included in my Curriculum Vitae
5 attached as **PAWC Exhibit MJG-1**.

6
7 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

8 **A.** My testimony will describe the collection system (“System”) currently owned and operated
9 by East Coventry Township (“East Coventry” or “Township”), PAWC has agreed to
10 acquire (the “Transaction”). I will also explain how the acquired System will be integrated
11 into PAWC’s existing operations, describe PAWC’s technical fitness to run the System,
12 and discuss the public benefits of the Transaction.

13
14 **Q. PLEASE DESCRIBE THE SYSTEM.**

15 **A.** East Coventry owns and maintains the sanitary sewer collection and conveyance system
16 within its municipal boundaries. As of September 25, 2025, the System provided service
17 to approximately 1,235 equivalent dwelling units (“EDUs”) or 966 customer connections,
18 the majority of which are residential with a few businesses. The non-residential customers
19 are not separately classified under the existing tariff and take service on the same rate
20 schedule as the residential customers. East Coventry does not track its exact number of
21 residential versus commercial customers because it bills on an EDU basis. The function
22 of the System is the collection and conveyance of wastewater for customers in Chester
23 County, Pennsylvania. The System assets consist of five pump stations, about 15 miles of

1 force, low-pressure, and gravity mains, 291 manholes, associated infrastructure and
2 appurtenances, treatment capacity rights, and related land and land rights. The System's
3 sewage flows are treated at North Coventry Municipal Authority's ("NCMA") 2.010
4 million gallons per day ("MGD") sewage treatment facility in North Coventry Township,
5 Pennsylvania. The System purchased 0.510 MGD of treatment capacity from NCMA in
6 2004. In 2024, the System's average daily flow was 0.142 MGD and has averaged 0.0135
7 MGD over the last five years (2020-2024). The System's five pump stations, Pump Station
8 Nos. 1 through 5, were constructed in 2004 and 2008. The System's pump stations have
9 generators and have a total of 15,816 feet of 4 to 8-inch diameter force mains. The System
10 also has 2,879 feet of 1.5 to 3-inch diameter low-pressure sewer mains, which were
11 installed in 2008, and 60,222 feet of 8 to 12-inch diameter polyvinyl chloride (PVC) and
12 ductile iron pipe (DIP) gravity sewer mains. About 42% of the gravity mains were installed
13 in 2004; 50% were installed between 2008 and 2011; and 7% were installed from 2016 to
14 2017. There are 291 manholes in the System.

15
16 **Q. IS PAWC ACQUIRING ALL OF THE SEWAGE COLLECTION SYSTEM**
17 **ASSETS OF THE TOWNSHIP?**

18 **A.** Yes.

19
20 **Q. PLEASE DESCRIBE THE SYSTEM'S SERVICE AREA.**

21 **A.** The System provides direct service to customers in the Township. No customers outside
22 the Township are provided service by the System. There are no bulk customers connected
23 to the System.

1 The System service area that PAWC is requesting to serve (“Service Area”)
2 includes the Township’s existing collection system and a service area for the extension of
3 service to the Parker Ford area in the southeastern corner of Township, which is part of a
4 municipally adopted Act 537 Plan Special Study dated July 2025 and included in
5 **Appendix A-22-b**. DEP is expected to approve the Act 537 Plan Special Study prior to
6 PAWC completing the acquisition of the System.

7
8 **Q. PLEASE DESCRIBE THE EXTENSION OF SERVICE TO THE PARKER FORD**
9 **AREA.**

10 **A.** The Parker Ford area is located in the southeastern corner of the Township and is currently
11 served by on-lot disposal systems. The area is served by water by a mix of wells, PAWC’s
12 Royersford System, and Coventry Terrace MHP. A survey of the existing wells found that
13 the wells were contaminated by total coliform, fecal coliform, and nitrates indicating the
14 groundwater is being contaminated by the on-lot systems. The Township performed an
15 update to their Act 537 Plan for the area and the recommended alternative to address the
16 on-lot system was an extension of the Township’s sanitary sewers into the affected area.
17 The sewer extension project will be broken into three phases.

18
19 **Q. WHO WILL BE RESPONSIBLE FOR CONSTRUCTION OF THE SEWER**
20 **EXTENSION PROJECT IN THE PARKER FORD AREA ONCE PAWC**
21 **ACQUIRES THE EAST COVENTRY SYSTEM?**

22 **A.** After the acquisition, PAWC will be responsible for the design, permitting, and
23 construction of the sewer extension project to the Parker Ford area. This project is

1 anticipated to take 5 years in total. After the project is complete, PAWC will serve an
2 additional 454 EDUs in the Township. Costs for the extension project are included in the
3 capital budget in **PAWC Exhibit MJG-2**.

4
5 **Q. WHAT IS AN “MS4” SYSTEM?**

6 **A.** An MS4 system is a “municipal separate storm sewer system.” East Coventry owns and
7 operates an NPDES permitted MS4 system.

8
9 **Q. IS PAWC ACQUIRING AN MS4 SYSTEM?**

10 **A.** No. PAWC will not be acquiring the MS4 system of East Coventry Township.

11
12 **Q. DOES THE SYSTEM HAVE AN INDUSTRIAL PRETREATMENT PROGRAM**
13 **(“IPP”)?**

14 **A.** No. There are no industrial customers in East Coventry.

15
16 **Q. PLEASE DESCRIBE THE PIPE SIZES AND MATERIALS USED FOR THE**
17 **CONSTRUCTION OF THE COLLECTION SYSTEM.**

18 **A.** Based on the information that was available and provided by East Coventry, the collection
19 system is of recent construction. The collection system consists of 60,222 feet of 8 to 12-
20 inch diameter polyvinylchloride (PVC) and Ductile Iron Pipe (DIP) gravity sewer mains
21 and 2,465 feet of 1.5 to 3-inch diameter low-pressure sewer mains. The collection system
22 is constructed with modern materials and is in good condition. The service laterals

1 providing connection between East Coventry's mains and the customer homes are owned
2 and maintained by the customer and are not part of the Transaction.

3 **Q. PLEASE STATE WHETHER THE SYSTEM CAN PROVIDE ADEQUATE**
4 **CONVEYANCE, TREATMENT AND DISPOSAL CAPACITY TO MEET**
5 **PRESENT AND FUTURE CUSTOMER DEMANDS.**

6 **A.** Based on East Coventry's 2024 Chapter 94 Wasteload Management Report included in
7 **Appendix A-20-c**, the conveyance, treatment, and disposal capacity are adequate to meet
8 present and future customer demands through the year 2029.

9
10 **Q. PLEASE STATE THE ELEVATIONS OF THE MAJOR FACILITIES AND**
11 **SERVICE AREA.**

12 **A.** Please see **Appendix A-16-f (CONFIDENTIAL)** for a map showing the approximate
13 elevations of the existing facilities.

14
15 **Q. DOES THE TOWNSHIP PROVIDE BULK TREATMENT SERVICE TO ANY**
16 **SURROUNDING SYSTEMS?**

17 **A.** No. The Township does not provide bulk wastewater conveyance/treatment services to
18 any surrounding systems.

19 **Q. DOES THE TOWNSHIP RECEIVE BULK TREATMENT SERVICE FROM ANY**
20 **SURROUNDING SYSTEMS?**

21 **A.** Yes. The Township receives bulk wastewater treatment services from North Coventry
22 Township.

1 **Q. DOES THE TOWNSHIP RECEIVE HAULED-IN WASTE IN THE COLLECTION**
2 **SYSTEM?**

3 **A.** No. There are no facilities for properly accepting and treating hauled-in waste at the
4 wastewater treatment plant or in the collection system. PAWC does not intend to begin
5 accepting hauled-in waste after Closing.
6

7 **Q. DOES PAWC PROVIDE WATER SERVICE IN THE SERVICE AREA?**

8 **A.** Yes. The PAWC Royersford water supply service area overlaps a portion of the
9 Township's service area. Approximately 71% of PAWC's Royersford water customers
10 are East Coventry sewer customers.
11

12 **Q. PLEASE DESCRIBE HOW PAWC WILL MANAGE THE DAY-TO-DAY**
13 **OPERATIONS OF THE SYSTEM ONCE IT IS ACQUIRED.**

14 **A.** The Township's System will be incorporated as an operating district into PAWC's
15 Southeast Area wastewater operations which include the nearby wastewater systems of
16 Royersford, Exeter, and Upper Pottsgrove.
17

18 **Q. ARE ANY OF THE EXISTING TOWNSHIP EMPLOYEES COMING OVER TO**
19 **PAWC AS PART OF THIS TRANSACTION?**

20 **A.** No Township employees are coming to PAWC as part of this transaction.
21

22 **Q. DOES PAWC ANTICIPATE HIRING ANY NEW EMPLOYEES AS A RESULT OF**
23 **THIS TRANSACTION?**

1 A. Yes, PAWC anticipates hiring one new employee to take care of the day-to-day operations
2 of the System as well as assist with the operations of PAWC’s nearby wastewater systems.
3 PAWC will handle water quality, management, engineering, etc. with existing PAWC
4 employees.

5
6 **Q. ARE OTHER PAWC EMPLOYEES AVAILABLE TO ASSIST WITH**
7 **WASTEWATER OPERATIONS, AS NEEDED?**

8 A. Yes. Current PAWC employees in the Royersford and Exeter operations as well as the
9 new employee will be under the same area management and supported by a shared support
10 team supporting common functions such as external affairs, supply chain, environmental
11 compliance, health and safety, customer service, human resources and engineering.
12 Employees in both the water and wastewater departments will support each other when
13 appropriate and necessary, particularly in emergency situations. All operations and
14 employees within PAWC and within the broader American Water Works Company, Inc.
15 (“American Water”) footprint have access to each other when circumstances require or
16 when a very specialized skill or experience is required to support all local issues.

17
18 **Q. WILL THERE BE ANY UNNECESSARY DUPLICATION OF OPERATIONS**
19 **FACILITIES FOLLOWING THE ACQUISITION?**

20 A. No, the System will be operated as a stand-alone system. It will, however, have the support
21 of PAWC’s surrounding operations, as well as PAWC’s operations through the
22 Commonwealth and American Water’s nationwide resources.

1 **Q. DOES PAWC PLAN TO INTERCONNECT THE SYSTEM TO ANOTHER PAWC**
2 **WASTEWATER SYSTEM?**

3 **A.** No, not at this time.
4

5 **Q. WHAT ARE THE ESTIMATED CAPITAL COSTS FOR THE SYSTEM?**

6 **A.** The five-year capital plan for the System is shown on **PAWC Exhibit MJG-2**. The total
7 estimated five-year capital cost is \$28.3 million.
8

9 **Q. HOW DID PAWC ARRIVE AT THIS FIGURE?**

10 **A.** The capital plan estimate is based on preliminary cost estimates of needed improvement
11 projects that were identified during PAWC's due diligence efforts, as well as the cost to
12 extend service into the Parker Ford area. The projects were identified through a
13 combination of: PAWC's independent observations of the System's conditions and needs;
14 meetings and discussions with PADEP staff; and input from Township staff from their
15 knowledge of the System's needs.
16

17 **Q. PLEASE DESCRIBE PAWC'S SYSTEM PLANNING, CAPITAL BUDGETING,**
18 **AND CONSTRUCTION MANAGEMENT PROCESS, WHICH WILL APPLY TO**
19 **THE TOWNSHIP AFTER CLOSING.**

20 **A.** PAWC has an established track record of successfully managing large capital investment
21 projects in order to provide reliable service to the communities it serves. PAWC has an
22 ongoing proactive program of capital investment focused on systematically replacing and
23 adding new pipes, treatment and pumping facilities, and other water and wastewater

1 infrastructure; thereby minimizing customer disruption caused by infrastructure failure.
2 PAWC has funded in excess of \$1 billion in capital construction over the past five years
3 with expenditures expected to total \$470 million to \$600 million per year for the next five
4 years. Capital planning is performed on a five-year planning horizon by in-house
5 engineering staff and operations to establish capacity needs, regulatory impacts, service
6 adequacy and reliability for PAWC's wastewater systems. As projects are delivered,
7 project costs, alternatives and risks are further developed, and competitive bidding for
8 consulting engineering design/permitting services and construction is utilized to keep costs
9 as low as possible. Comprehensive periodic oversight of water and wastewater assets
10 during the annual budgeting process and ongoing governance reviews gives PAWC a clear
11 and objective view of needs and potential capital project solutions. Once approved through
12 the capital governance process, the individual capital projects will be led and managed by
13 PAWC engineers working in the local Southeast Operations area, which will allow them
14 to maintain clear visibility to the projects and react to conditions as they develop.

15
16 **Q. PLEASE DESCRIBE THE TOWNSHIP'S CAPITAL IMPROVEMENT**
17 **PROGRAM. HOW WOULD PAWC'S PROACTIVE APPROACH BENEFIT**
18 **CUSTOMERS?**

19 **A.** The Township does not have a formal capital improvement program. Under PAWC's
20 ownership, customers would benefit because we take environmental compliance
21 requirements seriously and would not stray from schedule on such an important project.
22 The result would be a quicker solution to the water quality degradation being caused by
23 the failing on-lot systems and a much lower cost project in the end.

1 **Q. CAN PAWC COMPLETE THE PARKER FORD AREA EXTENSION PROJECT**
2 **MORE EFFICIENTLY THAN THE TOWNSHIP?**

3 **A.** Yes. Even ignoring future inflation and the resulting cost increases that will accrue should
4 the Township continue to delay the project, PAWC can deliver the remaining portions of
5 this project more efficiently than the Township.
6

7 **Q. DOES THE PENNSYLVANIA CONSTITUTION ADDRESS ENVIRONMENTAL**
8 **RIGHTS?**

9 **A.** I am advised by counsel that the Pennsylvania Constitution, Article I, Section 27,
10 guarantees the right to a clean environment, and requires the Commonwealth to conserve
11 and maintain environmental resources for the benefit of the public.
12

13 **Q. DOES THE TOWNSHIP’S SYSTEM CURRENTLY FACE ENVIRONMENTAL**
14 **CHALLENGES?**

15 **A.** Yes. The groundwater in the Parker Ford area is polluted with coliform, fecal coliform,
16 and nitrates caused by failing on-lot sewage disposal systems. The Township’s Act 537
17 Plan Update was completed in 2021, but the Township has not begun activities on the
18 improvements to address the environmental issue. This is due to the Township having no
19 way to spread the cost of the improvements over a wider customer base, which would
20 mitigate the cost to the customers in the Parker Ford area.
21

22 **Q. DOES THE TOWNSHIP HAVE COPIES OF ALL ENVIRONMENTAL PERMITS**
23 **REQUIRED TO OPERATE ITS SYSTEM?**

1 A. Yes. Copies of the permits are provided in **Appendix A-20-b**. PAWC will submit permit
2 transfer applications to PADEP to transfer the permits into PAWC's name upon Closing.

3

4 **Q. HOW WILL PAWC ADDRESS THE TOWNSHIP'S ENVIRONMENTAL**
5 **CHALLENGES AFTER CLOSING?**

6 A. Prior to closing, PAWC will undertake an update to the Township's Act 537 Plan to reflect
7 the change in ownership and to update the schedule for the completion of the recommended
8 improvements to the Parker Ford area. In the update to the Act 537 Plan, PAWC will
9 commit to finishing the improvements within 60 months of closing.

10

11 **Q. IF THE TRANSACTION WOULD NOT OCCUR, DO YOU BELIEVE THAT THE**
12 **TOWNSHIP WOULD HAVE THE FINANCIAL AND TECHNICAL**
13 **CAPABILITIES TO IMPROVE MATERIALLY ITS ENVIRONMENTAL**
14 **PERFORMANCE IN THE FUTURE?**

15 A. No. Based on past history, the Township has not proactively addressed the environmental
16 compliance issues in the Parker Ford area. As an experienced public utility, PAWC has
17 extensive experience in complying with current environmental regulations and being
18 proactive with capital investments to maintain system integrity and reliability, while
19 planning ahead for emerging contaminants or new regulations. The Township's reactive
20 approach will delay important infrastructure upgrades and create additional, unnecessary
21 costs for customers.

1 **Q. IN YOUR OPINION, IS PAWC BETTER EQUIPPED THAN THE TOWNSHIP TO**
2 **OPERATE AND MAINTAIN THE SYSTEM IN COMPLIANCE WITH**
3 **APPLICABLE ENVIRONMENTAL STATUTES AND REGULATIONS?**

4 **A.** Yes. PAWC can draw upon a much broader range of engineering and operational
5 experience, as well as deeper operational and financial resources, to address the
6 environmental compliance challenges of the System. In addition, given PAWC's
7 experience with the operation of similar wastewater systems, I believe that PAWC is better
8 positioned to provide those services on a cost-effective basis.

9 PAWC is the Commonwealth's largest investor-owned provider of water and
10 wastewater services. As a leading wastewater provider in Pennsylvania, PAWC brings
11 industry-leading expertise and has extensive technical experience in upgrading, operating,
12 and maintaining sewer facilities. PAWC is a recognized leader in providing communities
13 in the Commonwealth with well-maintained and reliable water and wastewater services.
14 With respect to this proposed transaction, PAWC already has extensive knowledge of the
15 local community due to PAWC's experience providing water service to the Township.

16 PAWC currently employs approximately 1,150 professionals with expertise in all
17 areas of water and wastewater utility operations including engineering, regulatory
18 compliance, water and wastewater treatment plant operation and maintenance, distribution
19 and collection system operation and maintenance, material management, risk management,
20 human resources, legal, accounting, and customer service. As a subsidiary of American
21 Water, PAWC has available to it additional resources of highly trained professionals who
22 have expertise in various specialized areas. American Water currently owns or operates
23 approximately 160 wastewater plants through its subsidiaries in a number of states.

1 American Water's experience includes the full breadth of treatment processes, from
2 facultative ponds to membrane biological reactors in every climate zone across the U.S.
3 More-advanced technologies allow a number of American Water's plants to utilize effluent
4 for reuse applications, eliminating discharge to receiving streams. These diverse facilities
5 have provided American Water operators and process experts with deep experience in the
6 operation and maintenance of every possible type of wastewater treatment technology.
7 This experience is available to support PAWC's operations staff and facilities.

8 A 50-person team of American Water corporate engineers has handled a wide
9 variety of system assessments, treatment process evaluations and design reviews for water
10 and wastewater treatment systems in order to improve operations and prioritize capital
11 improvements. For example, PAWC successfully leveraged the corporate engineering
12 expertise following two recent acquisitions, the Steelton water system, and the Exeter
13 wastewater system. For both of these systems, subject matter experts from the corporate
14 engineering team conducted process evaluations of the water and wastewater treatment
15 processes and identified solutions to remedy on-going operational challenges.

16 PAWC has demonstrated its ability to improve troubled municipal wastewater
17 systems following acquisition through improving operational efficiencies, fostering a
18 proactive environmental compliance culture in the local workforce, and investing capital
19 to replace and renew assets. PAWC has successfully addressed PADEP and USEPA
20 compliance orders requiring operational improvements and substantial capital investments
21 in several recent wastewater acquisitions, including Clarion, Claysville, Dravosburg,
22 Duquesne, Exeter, Kane, McKeesport, Port Vue, Scranton, and York. From 2018 through
23 2021, PAWC has made capital investments in its wastewater systems averaging \$762 per

1 year per customer connection. Prudent renewal and replacement of System infrastructure
2 through capital investment is the key to achieving and maintaining long-term
3 environmental compliance, and it is clear that PAWC is much more equipped than the
4 Township to make those ongoing capital commitments.

5 Furthermore, as the public water provider in some of the Township's service area,
6 PAWC can leverage synergies between the water and sewer infrastructure networks to the
7 benefit of customers and the general public. For example, PAWC will evaluate needed
8 infrastructure upgrades holistically from both the water and wastewater perspectives and
9 can plan water distribution system improvements and sewer system rehabilitation projects
10 together when feasible, reducing the number of street openings, lessening the
11 inconvenience to the public, and lowering overall construction and restoration costs.

12 The Township has limited resources and lacks access to the breadth of broad
13 industry knowledge and in-house subject matter experts that PAWC can bring to projects.

14
15 **Q. PLEASE DESCRIBE PAWC'S TECHNICAL FITNESS TO PROVIDE**
16 **WASTEWATER SERVICE TO THE TOWNSHIP'S CUSTOMERS.**

17 **A.** In addition to the points that I just mentioned, as of August 31, 2025, PAWC has
18 approximately 116,367 wastewater customers across the Commonwealth, with customers
19 in Adams, Allegheny, Beaver, Berks, Butler, Chester, Clarion, Cumberland, Lackawanna,
20 Luzerne, McKean, Monroe, Montgomery, Northumberland, Pike, Washington, and York
21 Counties. In comparison, the Township furnishes direct wastewater services to
22 approximately 966 customer connections in the Township.

1 PAWC has had no material issues in complying with the Code, the Clean Streams
2 Law, or other regulatory requirements. Moreover, PAWC has the resources, skills, and
3 expertise to respond to ever-increasing environmental standards for the conveyance of
4 wastewater and to manage the long-term infrastructure renewal and replacement needs
5 inherent in wastewater systems.

6
7 **Q. PLEASE DISCUSS PAWC’S SERVICE INTERRUPTION HISTORY.**

8 **A.** PAWC plans its maintenance and capital improvement projects in a manner that avoids
9 creating service interruptions. Care is taken to provide a continuous free flow of sanitary
10 waste from customer connections, even during these disruptive events. For main repairs,
11 crews will use bypass pumping arrangements so that sewage flow is captured and relocated
12 around the work area while repairs are being made. For pump station work, crews will use
13 bypass pumping similar to that described above, or pumper trucks to remove accumulated
14 wastewater in the pump station holding tanks and haul the contents to the plant or other
15 collection system location. PAWC also builds redundancy into its systems to provide
16 continued operational reliability in the event of equipment failures.

17
18 **Q. PLEASE DESCRIBE PAWC’S RESPONSE TO RECENT MAJOR STORM**
19 **EVENTS.**

20 **A.** PAWC has effective Emergency Response Plans (“ERPs”) in place at its water and
21 wastewater systems to prepare for, withstand, and recover from major storm events. The
22 ERPs are updated annually, and table-top exercises are conducted annually to test the plans.
23 For wastewater systems, emergency preparedness activities typically include: fueling

1 vehicles and emergency generators, ensuring staff has adequate personal protective
2 equipment for the conditions, rescheduling field staff for indoors work if possible to avoid
3 dangerous conditions, refreshing contact information and account numbers for local
4 electricity companies, activating flood protection plans for heavy rainfall events, planning
5 for snow removal/salting of parking lots, roads and sidewalks for winter storms, and
6 making operational adjustments to put treatment plants in storm mode to handle increased
7 flows.

8 PAWC is experienced in making strategic capital investments to improve the ability
9 of its wastewater systems to handle the increased flows from storm events. In the Clarion
10 wastewater system, acquired in 2008 from the Clarion Area Authority, PAWC has
11 successfully executed projects under a COA with PADEP to reduce illegal discharges to
12 waters of the Commonwealth. The work included Act 537 planning, design and
13 construction of new facilities, replacement of inadequate infrastructure, and modifications
14 to long standing operational procedures. Specifically, PAWC upgraded the collection
15 system by replacing approximately 10,000 LF of 8” to 36” interceptor sewers and
16 replacing/upgrading the main lift station (Liberty Street) and equipping it with a new
17 1.3 MG equalization tank to capture excess storm flows. PAWC also made major
18 hydraulic improvements to the wastewater treatment plant by increasing its design capacity
19 from 1.75 to 4.0 MGD and installing a new 3.8 MG equalization tank. Construction began
20 in July 2013 and was completed by the COA deadline of February 2015. The COA was
21 lifted in January 2016. Under the Clarion Area Authority’s ownership, the system
22 experienced approximately 30 SSOs per year and storm flows were routinely bypassed at
23 the wastewater treatment plant with no treatment. Since the new facilities were placed

1 online by PAWC, the SSOs have been reduced to an average of one per year, mainly caused
2 by damaged or clogged/blocked sewer mains, and there have been no bypasses of untreated
3 sewage at the wastewater treatment plant.

4 In the Scranton wastewater system acquired in late 2016, PAWC has completed 41
5 of 72 CSO control upgrades required under the system's approved LTCP. The remainder
6 will be addressed during the remaining 13 years of the 25-year LTCP. On average per
7 completed CSO Outfall, the improvements have reduced the number of CSOs during a
8 typical year from 25 to four and the total CSO discharge volume from 121 MG to 32 MG
9 (a 74% reduction). These numbers will continue to improve each year as PAWC installs
10 additional CSO control structures. At the treatment plant, PAWC increased the peak
11 capacity from 39 MGD to 60 MGD in 2020, which has resulted in a reduction in non-
12 compliance bypass events from a total of nearly 60 in 2019, to only 30 over the 4-year
13 period of 2021 through 2024.

14 With PAWC's previous experience in successfully remedying non-compliance
15 situations in other large sewer systems, PAWC is well equipped to handle the challenges
16 presented by the current condition of the Township's System.

17
18 **Q. DOES PAWC MAINTAIN CYBER SECURITY, PHYSICAL SECURITY,**
19 **BUSINESS CONTINUITY AND EMERGENCY PLANS?**

20 **A.** Yes. Cyber and physical security plans are maintained and monitored by American Water
21 for each of its subsidiaries. PAWC maintains ERPs and Operations and Maintenance
22 Manuals, both of which have operational business continuity included within the plans and
23 are updated each year. These plans are tested each year through emergency response

1 tabletop exercises. Each plan is overseen and managed by various groups and individuals
2 to provide overarching support to PAWC. These groups are responsible for testing,
3 reviewing, and updating their respective plan(s).

4 The departments assigned to Physical Security, Emergency Response, Business
5 Continuity, and Cyber Security plans are as follows:

- 6 • Physical Security Plan - Operational Risk Management Security (American
7 Water Works Service Company, Inc. (“AWWSC”));
- 8
- 9 • Cyber Security Plan - Operational Risk Management Security (AWWSC);
- 10
- 11 • Emergency Response Plan - Operations (PAWC); and
- 12
- 13 • Business Continuity Plan - Operational Risk Management (PAWC) and
14 Operations (PAWC).

15 To constantly protect physical and cyber resources, the designated groups have
16 developed procedures to ensure that PAWC operates in a safe, secure, and reliable
17 environment. A major commitment in assuring plans are kept current is performing various
18 testing on an annual basis. Types of testing performed by AWWSC and PAWC include
19 vulnerability assessments, system operational testing, full scale exercises, media backups,
20 and real-life events. The Township does not have similar plans in place.

21

22 **Q. PLEASE DESCRIBE PAWC’S CYBERSECURITY CONTROLS.**

23 **A.** PAWC’s cybersecurity controls are consistent with the National Institute of Standards and
24 Technology (“NIST”) cyber security framework and the American Water Works
25 Association (“AWWA”) Process Control System Security Guidance for the Water Sector.
26 The Township outsources its cybersecurity activities to a local firm that provides IT system
27 maintenance, software trouble shooting, and virus protection.

1 **Q. PLEASE EXPLAIN PAWC’S POLICIES AND PROCEDURES REGARDING**
2 **SERVICE CALLS.**

3 **A.** PAWC’s 24/7/365 customer service call center is available for routine customer
4 interactions from 7:00 a.m. to 7:00 p.m., Monday through Friday, and at all other times for
5 customer emergencies. When a customer calls the call center in an emergency situation,
6 the customer can speak with a representative 24/7/365. PAWC’s online MyWater portal
7 is also available for customers to resolve a multitude of customer service issues. Field
8 service crews are on-call and available for emergency fieldwork (main breaks, emergency
9 shut-offs, and emergency turn-ons) 24/7/365 outside of the normal work hours. In contrast,
10 the Township’s regular business hours for customer interactions are from 8:00 a.m. to 4:30
11 p.m. on Monday through Friday. From my perspective, PAWC offers better customer
12 service as compared to the Township.

13
14 **Q. PLEASE DESCRIBE PAWC'S RELATIONSHIPS WITH COMMISSION**
15 **EMERGENCY RESPONSE STAFF, PENNSYLVANIA EMERGENCY**
16 **MANAGEMENT AGENCY (“PEMA”) STAFF, AND LOCAL FIRST**
17 **RESPONDERS.**

18 **A.** PAWC has a strong working relationship with the Commission's Emergency Response
19 Staff. PAWC provides the Commission with emergency response numbers for all PAWC
20 operating areas each year. The Commission provides emergency numbers for its staff,
21 which PAWC distributes to all of PAWC's operating areas for inclusion in the PAWC
22 Emergency Response Plans. For those emergencies that warrant communication to the
23 Commission's Emergency Preparedness Liaison Officer (“EPLO”), PAWC has contacted

1 Commission staff in the past to advise them of situations and actions taken by PAWC.
2 Each year, PAWC conducts emergency response tabletop exercises to test responses to
3 emergency situations, including weather emergencies, contamination of supply, damage to
4 facilities, cyber-attack, and other perils. The Commission's emergency response staff has
5 participated in those exercises each year since 2006. We also invite local first responders
6 to participate, such as fire departments, police departments, hazmat responders, local prison
7 personnel, as well as PADEP and the Governor's Office of Homeland Security personnel.

8 PAWC has participated in Pennsylvania Water/Wastewater Agency Response
9 Network (“PaWARN”) and PEMA-sponsored exercises over the years. PAWC’s current
10 relationship with PEMA is through the Commission’s EPLO and PaWARN. PAWC is a
11 member in good standing of PaWARN.

12 In contrast, the Township is not a member of PaWARN. In my assessment, I would
13 say that PAWC is better than the Township in terms of emergency preparedness.

14
15 **Q. DOES PAWC HAVE AN EMPLOYEE SAFETY PROGRAM?**

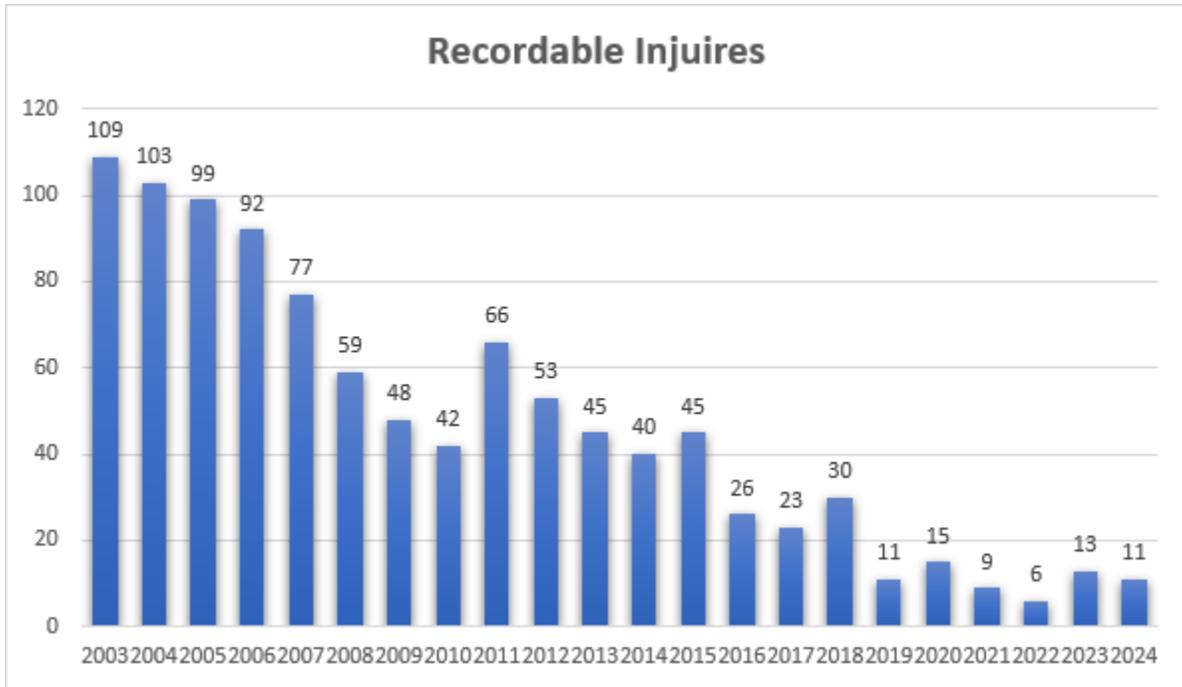
16 **A.** Yes. American Water and PAWC have made safety a value and not just a goal. It is very
17 important to us that every employee and contractor returns home safely every day. We
18 make safety a value instead of a goal because goals change, but values do not change.

19 Safety performance is fundamental to the Company's culture and key to its success.
20 Employees are expected to conduct themselves in a safe manner, in accordance with
21 PAWC’s Health and Safety Policy and with the Health and Safety Procedures and Practices
22 Manual. PAWC establishes, implements, promotes, and manages safety programs,
23 activities and training that enable continued safety improvement, injury reduction and

1 compliance with applicable Federal, State, and local requirements. Safety programs are
2 developed and implemented in accordance with Company policy and applicable practices
3 and include:

- 4 • Supporting practices that are developed, reviewed, and updated to provide
5 guidance on safe performance of activities in the workplace and are reflective
6 of changes in organizational, operational, and regulatory needs;
7
- 8 • Strategic and priority development and implementation of safety improvements
9 based on risk analysis of workplaces, work tasks and related potential injuries
10 and incidents;
11
- 12 • Near-miss reporting and corrective action program to identify and remove
13 safety hazards from the workplace;
14
- 15 • Development of, and measurement against, specific Company and external
16 safety performance targets and safety accountabilities for all employees;
17
- 18 • Ongoing assessment and review of safety processes, activities and supporting
19 programs (including those related to other Company policies, such as the
20 Workplace Conduct and Behavior Policy) to gauge effectiveness, identify
21 program gaps and pinpoint opportunities for continued improvement;
22
- 23 • Consistency of implementation and compliance with Company and regulatory
24 requirements across the enterprise; and,
25
- 26 • Defined and monitored contractor qualifications and requirements for safety
27 performance in accordance with approved contract documents, applicable laws,
28 and regulations.

29 PAWC has an excellent safety record. Moreover, PAWC has committed to
30 achieving zero injuries and has made great strides in changing the Company culture to
31 believe that such a target is achievable. Over the last 20 years, PAWC has consistently
32 reduced its number of recordable injuries and corresponding OSHA Recordable Incident
33 Rate, as shown in the figure below:



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Q. WHAT EFFORTS, IF ANY, WILL PAWC UNDERTAKE TO EDUCATE THE TOWNSHIP'S CUSTOMERS REGARDING PAWC OWNERSHIP OF THE SYSTEM?

1 **A.** As the Transaction is nearing Closing, PAWC plans to produce bill inserts or onserts and/or
2 letters to customers to explain the transition, billing, payment options and other items
3 associated with the change in ownership. PAWC's website will also add content to help
4 educate customers and to address frequently asked questions.

5
6 **Q.** **WHAT, IF ANY, CUSTOMER ENHANCEMENTS CAN THE TOWNSHIP’S**
7 **CUSTOMERS EXPECT AS A RESULT OF THE TRANSACTION?**

8 **A.** PAWC prides itself on providing superior customer service. As part of its commitment to
9 customer service, PAWC offers its customers a number of enhanced services, including
10 extended call center hours, additional bill payment options, enhanced customer information
11 and education programs, and access to PAWC's customer assistance program.

12
13 **Q.** **PLEASE PROVIDE ADDITIONAL DETAIL ON EACH OF THESE CUSTOMER**
14 **SERVICE ENHANCEMENTS.**

15 **A.** *Customer Service.* As discussed above, PAWC’s call center is available from 7:00 a.m. to
16 7:00 p.m., Monday through Friday for routine business and 24/7/365 for emergency
17 situations such as sewer back-ups or overflows. At all times, customers dealing with
18 emergency situations can make direct contact with a live customer service representative.
19 Customers can also reach a customer service representative via email at
20 infopa@amwater.com. In addition, PAWC’s customers have the ability to manage their
21 account via PAWC's “My H20” online portal. Finally, PAWC offers local field service
22 support 24 hours a day, seven days a week for customer emergencies. All of this means
23 that PAWC is very responsive to its customers and any issues they may have. PAWC will

1 provide the same responsive approach to the Township’s customers once PAWC acquires
2 the System.

3 ***Bill Payment Options.*** PAWC offers a number of bill payment options. Customers have
4 the option to receive paper bills through the mail or go paperless and receive their bills
5 electronically via the “My H20” on-line portal. Either way, customers can pay their bill
6 by mail, online, or over the phone with a debit or credit card. They can also pay by e-check
7 or an electronic funds transfer (which can be set up at the “My H20” online portal) or pay
8 in-person at multiple authorized payment locations across the state. The Township offers
9 payment options by mail, phone, online or drop box.

10 ***Customer Information and Education Programs.*** PAWC provides extensive customer
11 information and education programs that will be available to the Township’s current
12 customers through brochures, bill inserts, and educational videos posted on PAWC’s
13 website. PAWC’s customers always have full access to a wide range of topics, including
14 information on preventing sewer overflows, preventing frozen pipes, beneficially re-using
15 residuals from water treatment plants for community gardens, detecting and fixing silent
16 toilet leaks, properly disposing of unused pharmaceuticals to keep them out of the
17 wastewater system, conserving water, installing expansion tanks, obtaining Fire
18 Department Grants, and protecting customers from utility imposters.

19 ***Customer Assistance Programs.*** Finally, as new PAWC customers, the Township’s
20 customers will have access to PAWC's customer assistance program called the “H20 Help
21 to Others Program.” For wastewater customers, this program has three components:
22 (1) grants of up to \$500 per year; (2) a tiered discount on total wastewater charges based
23 on percentage of Federal Poverty Level (“FPL”); and (3) arrearage forgiveness. Tier 1

1 (0%-50% of FPL) receives an 85% discount; Tier 2 (51%-100% of FPL) receives a 73%
2 discount; Tier 3 (101%-150% of FPL) receives a 55% discount; and Tier 4 (151-200% of
3 FPL) receives a 37% discount. Additionally, PAWC offers payment arrangements and
4 budget billing to residential customers who qualify for the programs.

5 In comparison, the Township has no low-income customer service assistance
6 program nor any income-based repayment options.

7
8 **Q. DOES PAWC HAVE A PROGRAM TO PROTECT ITS CUSTOMERS AGAINST**
9 **UTILITY EMPLOYEE IMPOSTERS?**

10 **A.** Yes, PAWC has developed communications tools and programs to regularly educate
11 customers about the tactics used by utility employee imposters and what homeowners need
12 to know to protect themselves. The communications vehicles include bill inserts, news
13 releases, social media posts and website information about imposter-related crimes and
14 precautions that customers can take. In addition, PAWC helped form the Keystone
15 Alliance to Stop Utility Imposters, a coalition of water, gas, and electric utilities, along
16 with the Commission, Pennsylvania District Attorneys Association and Pennsylvania
17 Chiefs of Police Association, to launch a public awareness campaign using public service
18 announcements, print materials, posters, and community presentations.

19
20 **Q. PLEASE DESCRIBE PAWC'S CUSTOMER DISPUTE RESOLUTION**
21 **PROCEDURE.**

22 **A.** I am advised by counsel that PAWC is governed by the Commission's regulations
23 commonly known as Chapter 56, 52 Pa. Code §§ 56.1 *et seq.* The regulations provide the

1 procedures for public utilities to follow with regard to customer billing, collections,
2 payment arrangements, medical certifications, Protection from Abuse Orders, termination
3 of service, reconnection of service, and customer dispute resolution procedures.

4 PAWC has a customer compliance team located in the Mechanicsburg, PA office
5 responsible for ensuring that customer disputes and complaints across PAWC's entire
6 service territory are resolved in compliance with the Commission's regulations.
7 Additionally, the Company has a customer advocacy team located in the Mechanicsburg
8 office responsible for addressing any customer disputes and escalated concerns.

9 The Township's customer dispute process appears to be more informal. The
10 Township instructs customers to contact the Township office to discuss problems.

11
12 **Q. CAN YOU BRIEFLY COMPARE PAWC'S TERMINATION PROCESS TO THE**
13 **TOWNSHIP'S TERMINATION PROCESS?**

14 **A.** Yes. As discussed above, PAWC must comply with the Commission's regulations with
15 regard to customer termination. The Commission's regulations do not apply to the
16 Township. Instead, the Township follows the laws that apply to municipal authorities,
17 including the Water Services Act, which do not contain the extensive procedural safeguards
18 that are set forth in the Code and Commission regulations. The Township can terminate a
19 delinquent customer's sewer service by having water service to the customer terminated.
20 The Township can also impose a lien on the property as a collection instrument, rather than
21 terminating service. For terminations, the customer is mailed a notice before enforcement.
22 If the account still has an outstanding balance and if the property is served by PAWC, the

1 Township will notify PAWC to shut off water service in accordance with the shut off
2 agreement between PAWC and the Township,

3

4 **Q. DOES THE TOWNSHIP HAVE ANY BYPASS OR DEDUCT METERS? IF SO,
5 HOW WILL PAWC HANDLE THOSE?**

6 **A.** No. The Township is not set up to do bypass or deduct metering.

7

8 **Q. TO THE BEST OF YOUR KNOWLEDGE, DO THE TOWNSHIP'S CUSTOMERS
9 CURRENTLY HAVE A PUBLIC OMBUDSMAN TO REPRESENT THEIR
10 INTERESTS?**

11 **A.** No.

12

13 **Q. DO PAWC'S CUSTOMERS HAVE A PUBLIC OMBUDSMAN TO REPRESENT
14 THEIR INTERESTS?**

15 **A.** Yes. The Office of Consumer Advocate (“OCA”) represents residential customers of
16 public utilities; the Office of Small Business Advocate (“OSBA”) represents small
17 commercial customers of public utilities; and the Commission's Bureau of Investigation &
18 Enforcement (“I&E”) represents the general public interest. Moreover, the Commission,
19 an independent regulatory agency, has regulatory oversight of matters involving public
20 utilities. The Commission and all of the public advocates are funded by regulatory
21 assessments on public utilities.

22

23 **Q. IS PAWC SUBJECT TO COMMISSION JURISDICTION?**

1 A. Yes. PAWC’s service and rates are subject to Commission regulation and oversight. If
2 the Transaction is approved, future rate cases for customers of the Township will be
3 evaluated by the Commission to ensure that rates are just and reasonable. The PUC also
4 conducts audits and reviews PAWC filings. This oversight helps ensure that service is safe
5 and reliable. Township customers will be protected by the Code and by PAWC’s
6 Commission-approved tariff.

7
8 **Q. IS THE TOWNSHIP SUBJECT TO COMMISSION JURISDICTION?**

9 A. I am advised by counsel that it is not. If a customer is dissatisfied with the service or rates
10 of the Township, the customer must seek redress in a court of common pleas.

11 **CONCLUSION**

12 **Q. DO YOU BELIEVE PAWC HAS THE ABILITY TO PROVIDE SAFE,**
13 **ADEQUATE, AND RELIABLE WASTEWATER SERVICE TO THE**
14 **TOWNSHIP’S CUSTOMERS?**

15 A. Yes.

16 **Q. DO YOU BELIEVE THAT THE PROPOSED TRANSACTION WOULD RESULT**
17 **IN AN AFFIRMATIVE PUBLIC BENEFIT OF A SUBSTANTIAL NATURE?**

18 A. Yes. For the reasons stated in my testimony, PAWC, as the largest investor-owned water
19 and wastewater company in the Commonwealth, will be able to provide an enhanced level
20 of operational expertise and customer service. The Transaction will also improve the
21 environmental conditions in the Township. Approval of the Transaction would be
22 consistent with the Pennsylvania Constitution, Article I Section 27.

1 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

2 **A.** Yes. However, I reserve the right to supplement my direct testimony as additional issues

3 and facts arise during the course of the proceeding. Thank you.

PAWC Exhibit MJG-1

Michael J. Guntrum, P.E., MBA
Michael.guntrum@amwater.com

Management Professional/Project Manager/Environmental Engineer/Veteran

SUMMARY

Management professional offering 25 years of experience in Business Development, Project Management and Engineering and 32 years of experience in leadership roles. Involved in all aspects of Business Development at Pennsylvania American Water with solid knowledge of the Business Development process to include client contact and management, management of the bid process, formulation of a Bid-to-Win strategy, and development of the financial model and Risk Register. Has worked successfully with all functional groups within Pennsylvania American Water. Background includes capital planning and budgeting for water and wastewater projects, conducting presentations, ensuring projects remain within budget, and the construction and operations of high-quality water and wastewater systems. Earned an undergraduate and graduate degree in Civil/Environmental Engineering and a Masters of Business Administration. Supervised engineers and designers, guided engineering decisions, provided design support, and approved final design work.

COMPETANCY

- Professional – Masters degree in Engineering and Masters of Business Administration. Professional Engineering license in Environmental Engineering. Proficient in MS Word, Excel, Power Point, Project, and Visio. Excellent problem-solving skills. Continuously seeking to improve skills in management, project management, and engineering.
- Social – Leadership and team developmental skills attained through military training and wide-ranging professional experience. Ability to work with key stakeholders within and outside of the organization to accomplish objectives.
- Managerial – Creates opportunities for individual and team development. Communicates a plan for long term professional development. Ability to relate team goals to organization goals and values.
- Entrepreneurial – Continuously looking for ways to leverage diverse skills and experience to take advantage of strategic opportunities in the marketplace. Ability to quickly synthesize information to take decisive action while recognizing risk.
- Transforming – Understands diverse cultures through living and working in Germany for four years and the study of Russian language and culture. Focused on meeting and exceeding customer expectations. Ability to leverage diverse personal and professional experience to recognize opportunities for change.

EXPERIENCE

PENNSYLVANIA AMERICAN WATER, Hershey, PA
Senior Engineering Manager in Business Development

2003 - Present

Responsible for the review, study, and design of municipal water and wastewater treatment systems for the purpose of contract operations, acquisition, and post-acquisition integration. Professional experience includes reviewing operational information of the facility, developing operation and maintenance budgets, analyzing required capital expenditures, and writing engineering evaluations that are read and reviewed by functional groups and management. Works closely with every department within Pennsylvania American to include Management, Finance, Rates, Legal, Engineering, Water Quality, Production, and Loss Control. Attended NARUC Utility Rate School in 2007.

Was involved in the due diligence, acquisition, preparing testimony, regulatory filing, and integration of the following systems:

(* Denotes Provided Testimony in Proceeding)

- York Wastewater*
- Royersford Wastewater*
- Valley Water and Wastewater*
- Upper Pottsgrove Wastewater*
- Kane Wastewater*
- Steelton Water
- Exeter Wastewater
- McKeesport Wastewater
- Scranton Wastewater
- Fairview Wastewater
- New Cumberland wastewater
- McEwensville water
- McEwensville wastewater
- Shipperville wastewater
- Paint-Elk Wastewater
- Paint Township water
- Scott Township water
- Berry Hollow Water
- Franklin Township wastewater
- Hamiltonban wastewater
- Marcel Lakes wastewater
- Pocono Mountain Lake Forest water
- Koppel wastewater
- Indian Rocks water
- Olwen Heights water
- Fernwood water
- All Seasons water
- Lake Spangenberg water
- Wildcat water
- Applewood water
- Birch Acres water
- Sutton Hills water
- Nittany water
- Saxonburg water
- Boggs Water
- Clarion Area Authority wastewater
- Three Lane Utilities water
- Claysville-Donnegal water
- Claysville-Donnegal wastewater
- Mountain Top HOA water
- Lexington Woods water
- Pine Ridge HOA water

- Blue Mountain Lake water
- Blue Mountain Lake wastewater

Brinjac Engineering, Inc., Harrisburg, PA

1999 - 2003

Project Manager

Responsible for the study, design, and review of municipal wastewater treatment systems and potable water treatment and storage facilities. Professional experience includes the selection, evaluation, design engineering, and procurement of process equipment, pumping systems, piping, blowers, compressors, dry and liquid feed systems, solids conveying systems, flow and level measurement, and other process instrumentation. Also responsible for integration of process equipment into existing systems to include coordination with electrical, instrumentation, and control systems. Significant assignments have included:

- Design Engineer and Project Manager responsible for permitting and design of a new 1.5 million gallon per day wastewater treatment plant in Pine Grove Township. Total estimated project cost \$5,000,000.
- Project manager responsible for the feasibility study, preliminary design, final design, permitting, and construction administration for the construction of two 6-million gallon water storage tanks for the City of Harrisburg. The Project was awarded a Diamond Award in 2003 by the American Council of Engineering Companies for excellence in Water Resources Engineering. Total project cost \$4,500,000.
- Responsible for design of a new large plate and frame filter press and chemical feed systems at the Antrim Wastewater Treatment Plant. Total project cost \$850,000.
- Responsible for the engineering and project management services for the installation of a new belt filter press and chemical feed systems at the Stroudsburg wastewater treatment plant. Total project cost \$550,000.
- Design Engineer and Project Manager responsible for the design and construction services related to the installation of improvements to the existing aerobic digesters and chemical feed systems at the Stroudsburg wastewater treatment plant. Total project cost \$250,000.
- Project manager and design engineer responsible for the feasibility study, preliminary design, final design, permitting, and construction administration for the construction of improvements to the spillway at DeHart Dam. Total project cost \$250,000.
- Design Engineer and Project Manager responsible for design and installation of various improvements to the Lycoming County Wastewater Treatment Plant. Total project cost \$150,000.
- Lead the effort for the design and construction services related to the replacement of the Kautz Street Pump Station in the Borough of Stroudsburg. Total project cost \$100,000.
- Assisted the City of Harrisburg in modifying the corrosion control program for the potable water distribution system to respond to changes in the raw water supply. As a result of the new corrosion control program, customer water quality complaints have dropped significantly. Analyzed the potable water distribution system with a computerized hydraulic model to determine if water age in older parts of the distribution system could be improved by changing distribution system operations.

BLACK & VEATCH INC., Portland, Oregon

1997 - 1999

Environmental Engineer

Served as an Environmental Engineer for the study, design, and review of municipal wastewater treatment systems, water treatment and storage facilities, sewage and storm water collection and conveyance systems. Significant assignments included:

- Conducted Phase 1 of the Pipe Design and Life Study for the Portland Bureau of Water Works.

- Developed a program with the Portland Bureau of Water Works and their industrial customers to evaluate potential water conservation and provide mechanisms to encourage water conservation.
- Design of 2 new 42 million gallons per day slow sand filters and modifications to existing slow sand filter facility for the City of Salem. Total project cost \$4,500,000.
- Design of a new copper sulfate feed system for the City of Salem.
- Preparation of a detailed operations and maintenance manual for a chlorination/dechlorination facility at the Clackamas Filtration Plant.
- Preparation of a Risk Management Plan for the Clackamas Filtration Plant.
- Preparation of Risk Management Plans for the City of Salem.

US ARMY CORPS OF ENGINEERS, Portland, Oregon

1995 - 1997

Engineer, (2 year term position)

Design and analysis of hydraulic structures related to fish passage on the lower Columbia River dams. Assisted in the management and review of products from outside engineering firms. Significant assignments included:

- Participated in the evaluation of physical hydraulic model data and the design of modifications to the John Day Dam adult fish bypass system.
- Participated in the design of the Bonneville Dam First Powerhouse Juvenile Fish Bypass System.
- Provided technical support for the Dissolved Gas Abatement program.
- Design and analysis of hydraulic systems related to the juvenile bypass system at the John Day Dam.

US ARMY

1983 - 1990

Electronic Warfare Signals Intelligence Analyst

US Army, Field Station Augsburg, Germany, US Army detachment to the National Security Agency, Fort Meade, MD. Gathered, sorted, and scanned foreign intercept messages and signals, to include encrypted communications. Graduate of the Defense Language Institute specializing as a Russian Linguist. Awarded Top Secret Special Intelligence Security Clearance after a thorough background investigation.

EDUCATION

Lebanon Valley College, Annville, Pennsylvania

2008 - 2010

Masters Business Administration

NARUC Utility Rate School

2007

University of Idaho, Moscow, Idaho

1994 - 1995

Masters, Environmental Engineering

University of Idaho, Moscow, Idaho

1990 - 1994

B.S., Environmental Engineering

Noncommissioned Officer Leadership Development Program, Augsburg Germany

1989

Defense Language Institute, Monterey California

1985 - 1986

Russian Linguist

LICENSES

- Professional Engineer – Pennsylvania, Oregon, Professional Engineer with a license in Environmental Engineering

PAWC Exhibit MJG-2

Capital Improvement	Year 1	Year 2	Year 3	Year 4	Year5	Sum
Design and Permitting	\$ 500,000	\$ 500,000	\$ 233,333	\$ 133,333	\$ 133,333	\$ 1,499,999
Pump station	\$ -	\$ -	\$ 1,199,700	\$ 1,199,700	\$ 1,333,000	\$ 3,732,400
Phase I construction	\$ -	\$ 2,700,000	\$ 1,800,000	\$ 1,800,000		\$ 6,300,000
Phase II construction	\$ -	\$ -	\$ 2,700,000	\$ 2,000,000	\$ 2,000,000	\$ 6,700,000
Phase III construction	\$ -	\$ -	\$ 2,700,000	\$ 2,000,000	\$ 2,000,000	\$ 6,700,000
Total	\$500,000	\$3,200,000	\$8,633,033	\$7,133,033	\$5,466,333	\$24,932,399

Line	Capital Improvement	Year 1	Year 2	Year 3	Year 4	Year5	Sum
A	Mains - New	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
B	Mains - Replaced / Restored	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
C	Mains - Unscheduled	\$ 50,000	\$ 50,000	\$ 50,000	\$ 50,000	\$ 50,000	\$ 250,000
D	Mains - Relocated	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
E	Hydrants, Valves, and Manholes - New	\$ -	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000	\$ 80,000
F	Hydrants, Valves, and Manholes - Replaced	\$ -	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 160,000
G	Services and Laterals - New	\$ 20,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 40,000	\$ 180,000
H	Services and Laterals - Replaced	\$ 50,000	\$ 70,000	\$ 70,000	\$ 70,000	\$ 70,000	\$ 330,000
K	ITS Equipment and Systems	\$ 20,000	\$ 20,000	\$ 20,000	\$ 20,000	\$ -	\$ 80,000
L	SCADA Equipment and Systems	\$ -	\$ 300,000	\$ 300,000	\$ 300,000	\$ -	\$ 900,000
K	Security Equipment and Systems	\$ 25,000	\$ 25,000	\$ 250,000	\$ -	\$ -	\$ 300,000
N	Offices and Operations Centers	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
O	Vehicles	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ 150,000
P	Tools and Equipment	\$ 65,000	\$ 60,000	\$ 95,000	\$ 35,000	\$ 25,000	\$ 280,000
Q	Process Plant Facilities and Equipment	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 100,000	\$ 500,000
S	System Study	\$ -	\$ 100,000	\$ 100,000	\$ -	\$ -	\$ 200,000
	RP Total	\$480,000	\$825,000	\$1,085,000	\$675,000	\$345,000	\$3,410,000
	Grand Total						\$28,342,399

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

In re: Application of Pennsylvania-American Water Company under Sections 1102(a) and 1329 of the Pennsylvania Public Utility Code, 66 Pa C.S.§§ 1102(a) and 1329, for approval of (1) the transfer, by sale, to Pennsylvania-American Water Company, of substantially all of the assets, properties and rights related to the wastewater system owned and operated by the East Coventry Township, and (2) the rights of Pennsylvania- American Water Company to begin to offer or furnish wastewater service to the public in the Township of East Coventry, Chester County, Pennsylvania :

Docket No. A-2025-3053487, *et al.*

VERIFICATION

I, Michael J. Guntrum, P.E., hereby state that the facts set forth in PAWC Statement No. 2 and accompanying exhibits, if any, are true and correct to the best of my knowledge, information, and belief. I understand that this verification is made subject to the provisions and penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Date: October 8, 2025



Michael J. Guntrum, P.E.
Senior Project Engineer Business Development
Pennsylvania-American Water Company