



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

IN REPLY PLEASE
REFER TO OUR FILE

October 10, 2025

Docket No. R-2025-3057237
Utility Code 221800

COURTNEY L SCHULTZ ESQUIRE
SAUL EWING LLP
CENTRE SQUARE WEST
1500 MARKET STREET 38TH FLOOR
PHILADELPHIA PA 19102
COURTNEY.SCHULTZ@SAUL.COM

RE: City of Lancaster – Bureau of Water Supplement No. 49 to Tariff Water - Pa. P.U.C. No.
6 at Docket No. R-2025-3057237

Dear Attorney Schultz:

On September 30, 2025, City of Lancaster – Bureau of Water (Lancaster) 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 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 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

TUS Data Request Set 1

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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. Lancaster’s Tariff Supplement Filing does not appear to include information required by 52 Pa. Code § 53.52(a)(9). Please provide copies of customer polls taken and other documents which indicate customer acceptance and desire for the proposed changes. Also, if the poll or other documents reveal discernible public opposition, provide an explanation of why the change is in the public interest.
- R-2. Lancaster’s Tariff Supplement Filing does not appear to include information required by 52 Pa. Code § 53.52(a)(10). Please identify Lancaster’s plans for introducing or implementing the Tariff Supplement Filing with respect to its ratepayers.
- R-3. Lancaster’s Tariff Supplement Filing does not appear to include information required by 52 Pa. Code § 53.52(a)(11). Please identify Commission orders or rulings applicable to the Tariff Supplement Filing.
- R-4. Lancaster’s Tariff Supplement Filing does not appear to include information required by 52 Pa. Code § 53.52(c)(2) for the historic test year (HTY) ending March 31, 2025, and similar data required by 52 Pa. Code § 53.56(a) for the future test year (FTY) ending March 31, 2026. Please provide a detailed balance sheet for Lancaster as of the end of the HTY and as of the end of the FTY.
- R-5. Please provide a detailed balance sheet for Lancaster as of the end of the fully projected future test year (FPFTY) ending March 31, 2027.
- R-6. Lancaster’s Tariff Supplement Filing does not appear to include information required by 52 Pa. Code § 53.52(c)(6). Please describe any major changes in Lancaster’s operating or financial condition that occurred between March 31, 2025, and September 30, 2025, which materially alter Lancaster’s operating or financial condition from the conditions reflected in the Tariff Supplement Filing’s supporting data.
- R-7. Lancaster’s Tariff Supplement Filing does not appear to include information required by 52 Pa. Code § 53.45(h). Please provide an affidavit or verification that confirms that Lancaster completed all customer notice required by 52 Pa. Code § 53.45.
- R-8. Lancaster’s Tariff Supplement Filing, Lancaster Statement No. 2 does not appear to include a verification statement required by 52 Pa. Code § 1.36. Please provide a verification statement for the information provided in Lancaster Statement No. 2.
- R-9. Lancaster’s Tariff Supplement Filing does not appear to include information required by 52 Pa. Code § 53.53(a)(4). Exhibit D, Section VII.8 requires summaries of the company’s projected revenues, expenses, and capital budgets for the next 2 years. Please provide a complete response to Exhibit D, Section.VII.8.

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- R-10. Lancaster’s Tariff Supplement Filing does not appear to include information required by 52 Pa. Code § 53.53(a)(4). Exhibit D, Sections V.11.d. and V.11.e. require historic inventory values that were not provided in the Tariff Supplement Filing’s Exhibit D, V-11. Please provide a complete response to Exhibit D, Sections V.11.d. and V.11.e.
- R-11. Lancaster’s Tariff Supplement Filing does not appear to include information required by 52 Pa. Code § 53.53(a)(4). Exhibit D, Section V.12.h. requires anticipated retirements related to plant additions, and Section V.12.m. requires identification of which projects are due to a Pennsylvania Department of Environmental Protection or Federal Environmental Protection Agency requirement. Please provide complete responses to Exhibit D, Sections V.12.h. and V.12.m.
- R-12. Lancaster’s Joint Petition for Settlement for its last base rate case at Docket No. R-2021-3026682 (2021 Rate Case Settlement), Appendix B, Page 15 included a proof of revenue that identified approximately 4,608 residential customers (18,430 quarterly bills/year/4 quarters) and approximately 1,363 residential customers (5,451 quarterly bills/year/4 quarters) would be billed service charges for 3/4x1-inch meters and for one-inch meters, respectively. Also, Lancaster’s Tariff Supplement Filing, Exhibit GRH-1, Schedule 8 included a proof of revenue that did not identify any service charge revenues for customers with 3/4x1-inch meters and that identified approximately 6,207 residential customers (74,482 monthly bills/year/12 months) with one-inch meters. Please explain the apparent discrepancy regarding the 1,363 residential customers with one-inch meters identified in the 2021 Rate Case Settlement and the 6,207 residential customers with one-inch meters identified in Exhibit GRH-1, Schedule 8.
- R-13. Please explain why Exhibit GRH-1, Schedule 8 does not reflect any service charge revenue for customers with 3/4x1-inch meters.
- R-14. Please confirm that service charge data in Exhibit GRH-1, Schedule 8 for customers with 3/4x1-inch meters and one-inch meters is correct or provide a revised Exhibit GRH-1 with corrected service charge data for all meter sizes.
- R-15. Please confirm that meter size data in the Tariff Supplement Filing’s Exhibit GRH-2, Schedule E, Page 22 for customers with 3/4-inch meters and one-inch meters is correct or provide a revised Exhibit GRH-2 with corrected meter size data for all meter sizes.
- R-16. Lancaster’s Tariff Supplement Filing, Exhibit GRH-2, Schedule F indicated that all public fire protection service lines are four-inch pipe. Please confirm that public fire protection service line data in Exhibit GRH-2, Schedule F is correct or provide a revised Exhibit GRH-2 with corrected service line size data for public fire protection service lines.
- R-17. Please reconfirm the number of public fire hydrants with four-inch diameter service lines that are located outside of Lancaster’s corporate limits and explain whether Lancaster

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intends to continue to use four-inch diameter pipe when Lancaster installs replacement public fire hydrants and related service lines.

- R-18. Please explain how any corrections to meter size and public fire protection service line size data in Exhibit GRH-2 affect the allocation of costs between customers within Lancaster’s corporate limits and customers outside of Lancaster’s corporate limits (e.g., allocation factors 8, 8B, and 20, etc.).
- R-19. Please explain how any corrections to meter size and public fire protection service line size data in Exhibit GRH-2 affect cost allocations between customer classes (e.g., residential, commercial, reallocation of public fire protection costs, etc.) and within customer classes (i.e., costs for different meter sizes) for customers outside of Lancaster’s corporate limits.
- R-20. Lancaster’s Tariff Supplement Filing, Exhibit GRH-1, Schedule 2, Page 1 identified no adjustments in other operating revenues for “Sewer Reimb – Meter Shop” from the HTY value of \$134,816. However, Exhibit GRH-1, Schedule 3, Page 4, Line No. 128 identified an increase in total meter shop expenses from \$467,139 in the HTY to \$648,733 in the FPPTY. Please explain how apparent reimbursements from Lancaster’s wastewater operations for meter shop expenses are determined, state whether these reimbursements would increase proportionately with total meter shop expenses, and clarify whether corrections to meter size data in Exhibit GRH-2 affects the allocation of this revenue.
- R-21. Ordering Paragraph 4 of the Commission’s Order entered May 12, 2022, for Lancaster’s last base rate case at Docket No. R-2021-3026682 (May 2022 Order) directed that on a monthly basis, to the extent it is available, Lancaster will provide the Commission with Fully Projected Future Test Year reporting updating the Original Cost of Utility Plant in Service from Schedule 4 of Exhibit GRH-1 for the period ending December 31, 2021, by July 1, 2022, and for the period ending December 31, 2022, by April 23, 2023. Please provide evidence that Lancaster complied with Ordering Paragraph 4 of the May 2022 Order.
- R-22. Lancaster’s 2021 Rate Case Settlement, Section 17.d. included an agreement that Lancaster would provide a copy of its customer complaint log in live Excel format. Please provide a copy of Lancaster’s customer complaint log in live Excel format.
- R-23. Please state whether Lancaster provided notice of its proposed rates to each municipality located outside of Lancaster’s corporate limits that may be subject to Lancaster’s proposed rates, including each municipality identified in the Tariff Supplement Filing’s Statement No. 4, Page 18, Table 2 that may be subject to proposed public fire protection rates.