



Erin K. Fure
Director, Corporate Counsel
852 Wesley Drive | Mechanicsburg, PA 17055
Phone: 717-550-1556
erin.fure@amwater.com

VIA eFiling

October 20, 2025

Matthew L. Homsher, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

Re: Application of Pennsylvania-American Water Company Pursuant to Sections 507, 1102, and 1329 of the Public Utility Code for Approval of its Acquisition of the Wastewater System Assets of Exeter Township

Docket No. A-2018-3004933

Dear Secretary Homsher:

Pennsylvania-American Water Company (the "Company") is providing the enclosed Status Report of Infiltration and Inflow Study of the Former Exeter Township Wastewater System ("Status Report") in response to the Commission's Letter dated September 19, 2025, provided as a follow up to the Commission's Order entered October 3, 2019, specifically Ordering Paragraph 15.

As indicated on the enclosed Certificate of Service, copies of the Status Report will be served upon the parties.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "EK Fure".

Erin K. Fure

Enclosures

cc: Certificate of Service
Matthew T. Lamb, P.E., Bureau of Technical Utility Services w/Encs. **VIA** Email

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania-American Water Company Pursuant to Sections 507, 1102, and 1329 of the Public Utility Code for Approval of its Acquisition of the Wastewater System Assets of Exeter Township :
: :
: Docket No. A-2018-3004933
: :
:

**STATUS REPORT OF
PENNSYLVANIA-AMERICAN WATER COMPANY’S INFILTRATION AND INFLOW
STUDY OF THE FORMER EXETER TOWNSHIP WASTEWATER SYSTEM**

AND NOW COMES Pennsylvania-American Water Company (“PAWC” or the “Company”), in compliance with the Pennsylvania Public Utility Commission’s (the “Commission”) Opinion and Order entered on October 3, 2019 at the above-captioned docket, as well as in compliance with the Secretarial Letter entered on September 19, 2025 at the above-captioned docket, to file this status report of the Infiltration and Inflow (“I&I”) study (“I&I Study”) of the wastewater system formerly owned by Exeter Township (“Exeter System”).

I. INTRODUCTION AND PROCEDURAL HISTORY

On September 25, 2018, the Company filed an Application seeking approval of (1) the acquisition, by PAWC, of the wastewater system assets of Exeter Township (“Township”), (2) the right of PAWC to begin to offer, render, furnish and supply wastewater service to the public in portions of the Township, and (3) an order approving the acquisition that includes the ratemaking rate base of the Township’s wastewater system assets pursuant to Pennsylvania Public Utility Code (the “Code”) Section 1329(c)(2), 66 Pa. C.S. § 1329(c)(2).

On December 5, 2018, the Company filed an Amended Application.

On October 3, 2019, the Commission entered an Opinion and Order approving the Application filed on September 25, 2018, as amended by the Amended Application filed on December 5, 2018, subject to enumerated conditions. Ordering paragraph 15 of the October 3, 2019 Opinion and Order stated as follows:

15. That, within six months after closing of the Transaction, Pennsylvania-American Water Company shall start an Infiltration and Inflow study for the Exeter System and provide the results of said study, upon completion, to all Parties to this proceeding. All Parties reserve the right to challenge the recovery of costs related to inflow and infiltration, including the cost of the study, in subsequent rate proceedings.

On October 25, 2019, the Company filed a letter notifying the Commission that PAWC closed on the acquisition of the Exeter System (“Closing”) on October 24, 2019.

II. STATUS

A. Summary of the PAWC’s activities, listed by completion date, taken to complete the I&I Study

By way of further background, on the date of the Closing, the Company entered into a Consent Order and Agreement with the Pennsylvania Department of Environmental Protection (“DEP”), which contained reporting requirements that were specific to I&I as well as the requirement for PAWC to submit a Phase 1 Corrective Action Plan (“CAP”) within 90 days to identify tasks and schedules of what PAWC would complete. Additionally, within three years, PAWC was required to submit a Phase 2 CAP to demonstrate completion of the tasks. The Phase 1 CAP was submitted to DEP on January 21, 2020. The Phase 2 CAP was submitted to the DEP on October 18, 2022.

At Closing, the Company was provided with a basic mapping of the collection system. Flow metering points were limited to pump stations and the St. Lawrence meter pits, used for

totalization. There had been no collection system condition-based assessments in recent history. The 2015 Act 537 plan did provide a hydraulic capacity analysis of the interceptors.

PAWC engaged with a local consulting engineering company to perform the services for locating all sanitary sewer assets, surveying, GPS and manhole inspection of the Exeter System. The information gathered was used to prepare an accurate baseline map of the Exeter System.

Between December 2019 and August 2020, the Company focused on flow metering improvements. At Closing, flow metering in the Exeter System included the four (4) meter pits measuring the flow in and out of the St. Lawrence sewer system, a meter pit for the Pioneer Landfill, and flow meters and hour meters at the six (6) pumping stations. The data collected from the above points was all used for the purpose of metering, monitoring and modeling flows or the equipment was limited to totalizing the flow. Upgrades were needed on all the locations to properly collect and store the data for use in identifying average day, maximum day and peak hourly flow data in comparison to rainfall data. The data gathered from mapping, metering, and CCTV was utilized for preparation of a hydraulic model of the system. The following paragraphs contain a description of the improvements:

It was determined that the existing meter pits at the Closing were not capable of logging and storing data. Each of the meter pits was updated with new equipment to include the installation and setup of the Endress Hauser open channel flowmeter with Endress Hauser RSG 35 digital recorders at metering points with existing power. Meter Pits without power include a 250 Watt Solar power panel system with stainless steel enclosure.

It was determined that the existing pump stations at the Closing were not capable of logging and storing data. Each of the pump stations was updated with new equipment to include the installation and setup of the Endress Hauser Prosonic or Promag flowmeter with Endress Hauser

RSG 35 digital recorders at metering points with existing power. Meter Pits without power include a 250 Watt Solar power panel system with stainless steel enclosure.

Considering the number of existing meter pits and pump stations, there were not enough metering points at Closing to adequately evaluate the collection system. Additional metering points were added at strategic locations throughout the collection system. Each of the manhole metering points were updated with new equipment to include the installation and setup of the Endress Hauser open channel flowmeter with Endress Hauser RSG 35 digital recorders at metering points with power available. Manhole metering points without power include a 250 Watt Solar power panel system with stainless steel enclosure.

The existing influent pumping station at the time of Closing did not have an operating flow meter. The contractor as part of the improvements provided a flow meter on the discharge of the influent pumps for the purpose of start-up. PAWC replaced the existing meter to match the others for ease of collecting and manipulating data. The improvements include the installation and set-up Endress Hauser Prosonic transmitter flowmeter with Endress Hauser RSG 35 digital recorder.

At Closing, the existing effluent meter without an operating SCADA system had the same issues as far as collecting and manipulating data, and the unit was upgraded to include the installation and set-up of a Endress Hauser radar level transmitter with Endress Hauser RSG 35 digital recorder.

Between August 2020 and August 2021, the Company used closed-circuit TV (“CCTV”) inspections to document deficiencies in the Exeter System. PAWC also engaged a contractor to perform sewer main inspections 8-inch through 30-inch sewer lines performed by autonomous and multi-sensor devices. The work included installation and removal of equipment, PACP defect coding, lateral locations digital CCTV, Sonar and Laser, and web-based asset management software

upload and viewer. Smoke testing for the purpose of I&I investigation was only used in isolated areas where PAWC looked for interconnections with storm sewer inlets or downspouts.

From August 2021 through October 2022, PAWC conducted an evaluation to determine areas of excess I&I. Following the mapping, manhole inspection, metering installation and CCTV investigation is completed, the data collection began to evaluate the collection system to identify areas of excess I&I that may be causing or contributing to the sanitary sewer overflows (“SSOs”). The data was collected for at least one calendar year to perform a proper evaluation.

From August 2022 through October 2022, the Company engaged in identification of hydraulic deficiencies that may be causing or contributing to SSOs.

B. Outline of remaining steps PAWC will take to complete the I&I Study

There are no additional remaining steps for the Company to take in order to complete the I&I Study for the Exeter System.

C. Findings of the I&I Study

The following section describes some of the plan and schedule of projects and actions that were set forth in the Company’s Phase 2 CAP to address I&I based on the deficiencies identified.

The Exeter Wastewater Treatment Plant (“WWTP”) Influent Pump Station Project

Prior to PAWC’s acquisition of the Exeter System in October 2019, the WWTP’s influent pump station experienced a major flooding event that damaged all three pumps. The Township requisitioned portable pumps. These portable pumps were used for months while the Township decided how to restore the influent pump station to its pre-existing condition and capacity. Within the first year of PAWC ownership and operation of the Exeter WWTP, PAWC experienced additional operational difficulties with the existing influent pumps during all flow conditions including high flow periods when all three pumps were required to operate. The necessary operation of all three pumps to handle the wet weather high flows presented a reliability problem

since there was no true back-up pump. In December 2021, PAWC installed a fourth pump and replaced one of the old shaft driven, magnetic drive pumps. The two new and replacement pumps are Flygt dry pit submersible pumps of equal capacity to the existing pumps. Additionally, PAWC upgraded the pump controls.

However, due to the very small volume of the IPS wet well and the maximum flow capacity with three pumps running at a total flowrate of 21-22 MGD during wet weather high flow events, the wet well continued to flood over the lower level floor and causes surcharges in the upstream sewer network. The normal operating level of the wet well only has 3,735 gallons of capacity and 9,413 gallons until it overtops the lower level floor and submerges the comminutor. The wet well side lower-level floor elevation is 139.83 feet and during a fairly common wet weather event as experienced on April 7, 2022, the wet well overflowed on the floor up to an elevation of +/-144 feet. High wet well occurrences like the April 7th event are common during rainfall events. For extreme rainfall events like Hurricane Ida, the wet well level rose to an elevation of +/- 162 feet. During periods of wet weather high flows the surcharging of the influent pump station wet well causes surcharging of the Schuylkill River Interceptor, which in turn causes surcharging on each of the sewer collection mains that discharge into the Schuylkill River Interceptor to at least the point north of the railroad tracks.

This surcharging of the IPS wet well and Schuylkill River Interceptor demonstrates that the existing firm capacity of the existing influent pump station is inadequate for current wet weather high flows and, frequently, the lesser rainfall events. PAWC proposed the preliminary design concept of the upgrade or replacement of influent pump station; screenings and grit removal facilities; and equalization storage facilities. By the end of 2022, PAWC engaged an engineering consulting firm to identify and evaluate alternatives and to design and permit the selected

alternative. The following are the tasks that are to be considered as part of the evaluation and design of the proposed WWTP IPS improvements: (1) Task 1- Wastewater Characterization completed by end of 2023; (2) Task 2- Unit Process Evaluation- completed in 2024; (3) Task 3- New Influent Pump Station Layout—completed in 2024; (4) Task 4- New Influent Pump Station Design- completed in 2025. This project must also undergo a bidding process and construction phase.

Exeter Collection System—Schuylkill River Interceptor Projects

The Exeter System is divided into three main drainage basins conveyed to the wastewater treatment plant through the Antietam Creek, Heisters Creek and Schuylkill River Trunk Sewers. The collection system collects and conveys domestic and industrial wastewater through 87 miles of sewer pipe to the Exeter WWTP. The system contains six wastewater pumping stations.

The Schuylkill River Trunk Sewer begins at the Exeter WWTP at manhole 1 and continues along the southern border of the Township and the Schuylkill River, then turning north along East Neversink Road and ending at state route 422. The Schuylkill River Trunk Sewer is 15 inches in diameter up at the connection point with the Antietam Creek Trunk Sewer where it is enlarged to thirty inches in diameter up to the wastewater treatment plant.

In the first three years of PAWC ownership of the Exeter System, PAWC studied the wastewater system by performing an inventory of the existing assets with the survey of all manholes by Spotts, Stevens and McCoy, Inc. (SSM) which provided the GPS coordinates for each manhole as well as the depth, inverts and condition. PAWC also employed Redzone Robotics to televise the sewer mains and perform a condition assessment of the sewer main. Redzone televised 564,400 feet of sewer main in Exeter. The results were then tabulated and 201 NASCO grade 4 and 5 defects were identified. The videos of each defective segment were viewed and then

categorized. Categories included, I&I, sags, roots, offset joints, intruding laterals and cracks. A map was prepared showing the locations and types of the defects. The map is referenced each year to identify projects to be lined or replaced in the following year's budget. To date 1990 feet of 8" sewer main was sliplined to help prevent I&I.

III. CONCLUSION

WHEREFORE, Pennsylvania-American Water Company respectfully requests that Pennsylvania Public Utility Commission accept this Status Report on the Infiltration and Inflow Study of the former Exeter Township wastewater system.

Respectfully submitted,



Erin K. Fure, Esquire (PA ID # 312245)
Director, Corporate Counsel
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
Telephone: (717) 550-1556
E-Mail: erin.fure@amwater.com

Counsel for *Pennsylvania-American Water Company*

Dated: October 20, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania-American Water Company Pursuant to Sections 507, 1102, and 1329 of the Public Utility Code for Approval of its Acquisition of the Wastewater System Assets of Exeter Township :
: **Docket No. A-2018-3004933**
:
:
:
:

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true copy of Pennsylvania-American Water Company's Status Report of Infiltration and Inflow Study of the Former Exeter Township Wastewater System, upon the persons and in the manner indicated below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a party).

VIA Electronic Delivery

Harrison W. Breitman, Esq.
Assistant Consumer Advocate
PA Office of Consumer Advocate
555 Walnut Street, 5th Floor, Forum Place
Harrisburg, PA 17101-1923
(via electronic mail – hbreitman@paoca.org)


NazAarah Sabree
Small Business Advocate
PA Office of Small Business Advocate
555 Walnut Street, 1st Floor, Forum Place
Harrisburg, PA 17101
(via electronic mail – ra-sba@pa.gov)

Allison Kaster
Director and Chief Prosecutor
PA Public Utility Commission
Bureau of Investigation and Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor, West
Harrisburg, PA 17120
(via electronic mail – akaster@pa.gov)

Samuel W. Cortes, Esq.
Fox Rothschild LLP
Eagleview Corporate Center
747 Constitution Drive, Suite 100
Exton, PA 19341-0673
(via electronic mail – scortes@foxrothschild.com)

Paul Diskin, Director
PA Public Utility Commission
Bureau of Technical Utility Services
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120
(via electronic mail – pdiskin@pa.gov)

Dated: October 20, 2025



Erin K. Fure (PA ID# 312245)
Director, Corporate Counsel
Pennsylvania-American Water Company
852 Wesley Drive, Mechanicsburg, PA 17055
Office: 717.550.1556
erin.fure@amwater.com