



**Erin K. Fure**  
Director, Corporate Counsel  
852 Wesley Drive | Mechanicsburg, PA 17055  
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[erin.fure@amwater.com](mailto:erin.fure@amwater.com)

**VIA** eFiling

November 5, 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 for the approval of the right to offer, render, furnish and supply water service to the public in an additional portion Jackson Township, Butler County, Pennsylvania

Docket No. A-2025-3055966

Dear Secretary Homsher:

On October 22, 2025, Pennsylvania-American Water Company (the "Company") received Data Request, Set 4, from the Bureau of Technical Utility Services ("Data Requests"), for the above-referenced Application.

Enclosed are the Company's responses to the Data Requests. The responses have been served upon the parties listed on the enclosed Certificate of Service.

If you have any questions, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Erin K. Fure".

Erin K. Fure

Enclosures

cc: Certificate of Service  
M. Livingston, Bureau of Technical Utility Services w/Encs. **VIA** Email

TUS Data Request Set 4

Application of Pennsylvania-American Water Company for Approval of the Right to Offer, Render, Furnish and Supply Water Service to the Public in an Additional Portion of Jackson Township, Butler County, Pennsylvania

Docket No. A-2025-3055966

A-26. PAWC's response to Data Request A-25 indicated that Phases 3 and 4's average daily demand is 16,200 gpd. In PAWC's Amended response to Data Request A-19 the quantity of meters in Phase 3 was updated from 59 5/8-inch meters to 45 5/8-inch meters and 52 one-inch meters. The quantity of meters in Phase 4 was updated from 49 5/8-inch meters to 49 one-inch meters and 60 5/8-inch meters. Please provide an updated average daily demand for the apparent 206 residential customers in Phases 3 and 4 or confirm that the projected average daily demand for Phases 3 and 4 is 16,200 gpd.

Response: There are 206 residential customers, and the projected average daily demand would be 30,900 gallons.

Name: Jason Kessler  
Title: Superintendent Operations, Operations Western Pennsylvania-Northwest Pennsylvania-American Water Company

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A-27. In response to Data Request A-18, Phase 3's breakdown included 45 5/8-inch meters and 52 one-inch meters, but only 40 water service lines. Please provide an updated breakdown of water service line quantities, sizes, materials, and costs to correct this apparent discrepancy or explain why there are 57 more meters than water service lines.

Response: Below is the Statement of Values for all of Phase 3:

W-18	3/4" Water Service including corporation, soft K-copper, curb stop w/ valve box & S/S Rod	45	Each	\$ 1,500.00	\$ 67,500.00
W-19	1" Water Service including corporation, soft K-copper, curb stop w/ valve box & S/S Rod	52	Each	\$ 1,725.00	\$ 89,700.00
	Special Backfill (Compacted 2A Limestone in				

The 40 water service lines were provided in response to Data Request A-18 reflected only what was installed **on site as of June 3, 2025**. The statement of values for **ALL of Phase 3** shows the quantities, sizes, materials and costs for all of Phase 3.

Name: Jason Kessler  
Title: Senior Superintendent Operations, Operations Western Pennsylvania-Northwest Pennsylvania-American Water Company

TUS Data Request Set 4

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Docket No. A-2025-3055966

A-28. In response to Data Request A-18, PAWC identified five hydrants in Phase 3 and two hydrants in Phase 4. Please provide evidence that Jackson Township has agreed to pay these charges or has approved a subdivision plan that includes this updated amount of public fire hydrants.

Response: Please see attached **TUS-A-28\_Attachment**.

Name: Jason Kessler  
Title: Senior Superintendent Operations, Operations Western Pennsylvania-Northwest Pennsylvania-American Water Company

TUS Data Request Set 4

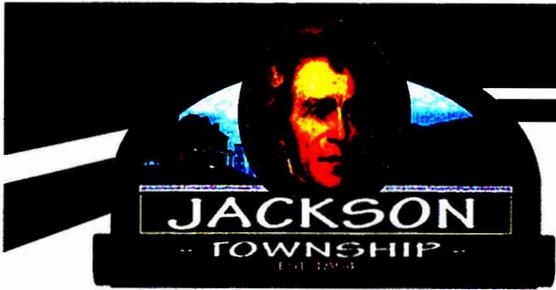
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A-29. In the amended response to Data Request A-20, the copy of the revised Exhibit K attached as TUS-A-20\_Attachment\_Amended is not an amended copy of the revised Exhibit K in PAWC's original response to Data Request A-20. Also, the revised Exhibit K did not include revenue from the 101 one-inch water meters, the 105 5/8-inch water meters, and the seven fire hydrants for Phases 3 and 4 included in the response to Data Request A-18. Please provide a copy of the revised Exhibit K that conforms with the Phase 3 and 4 facilities included in the response to Data Request A-18.

Response: Please see attached **TUS-A-29\_Attachment\_Amended**.

Name: Jason Kessler  
Title: Senior Superintendent Operations, Operations Western Pennsylvania-Northwest Pennsylvania-American Water Company



Jay Grinnell  
Chairman

Allan Osterwise  
Vice Chairman

Marianne Hall  
Supervisor

July 31, 2024

Gregg Heinemann  
Seneca Trails, LLC  
202 Gabriel Drive  
Mars, PA 16046

Re: Approval Letter  
Final Phase 3, 4 & 5, Planned Residential Development  
Seneca Trails  
Jackson Township, Butler County

Dear Mr. Heinemann:

Please be advised that at its regular meeting held on Thursday, July 18, 2024 the Jackson Township Board of Supervisors (the "Board") approved the Final Phases 3, 4 & 5, Planned Residential Development, subdivision plan application for Seneca Trails for 45 single-family lots and 52 townhomes for Phase 3, 60 single-family lots and 49 townhomes for Phase 4 and 66 single-family lots in Phase 5, and related appurtenances, filed by Sheffler & Company, Inc. on behalf of Seneca Trails, LLC (the "Developer") under Chapter 22 of the Jackson Township Code of Ordinances, Subdivision and Land Development, as amended, residential subdivision plan located on Gudekunst Road, in the Township's R, Residential District, currently designated as Butler County Tax Parcel No. 180-4F123-2B, 180-4F123-3 and 180-4F123-4, in accordance with the application materials, plans, documents, other material submitted to the Township, including but not limited to the plans prepared by Sheffler Company, Inc, dated July 3, 2024 (the "plans"), as follows:

- **Project Narrative** - by Ed Moore, of Sheffler & Co. Inc., Electronically received June 13, 2024.
- **Cover Letter**- by Ed Moore, of Sheffler & Co. Inc., Electronically received June 13, 2024.
- **Application**- Final Phase 3, dated June 13, 2024, by Ed Moore of Sheffler & Co. Inc., Electronically received June 13, 2024.
- **Cover Letter**- by Ed Moore-Sheffler& Company, Inc. dated July 3, 2024, received July 3. 2024.
- **Response Letter to Administrative Completeness Review Letter**, by Ed Moore – Sheffler & Company, Inc., dated July 3, 2024. Received July 3, 2024.
- **Application**-Final Phase 4., dated June 13, 2024, by Ed Moore of Sheffler & Co. Inc., Electronically received June 13, 2024.
- **Application**- Final Phase 5, dated June 13, 2024, by Ed Moore of Sheffler & Co. Inc., Electronically received June 13, 2024.
- **Geo-Technical Investigation Report**- dated November 2022, prepared by NGE- Environmental & Geotechnical Engineering Solutions, LLC., Electronically received June 13, 2024.
- **Geo-Technical Investigation Report (Elmwood Park)**- dated July 2023, prepared by Geo-Mechanics, Inc., Electronically received June 13, 2024.

- **Traffic Impact Study**- dated July 2023, prepared by Gateway Engineers, Inc., Electronically received June 13, 2024.
- **Regulated Waters Investigation Report- Wetland Report-** (Elmwood- Franz Property)- August 9, 2023, prepared by Palustris Environmental LLC, Electronically received June 13, 2024.
- **Regulated Waters Investigation Report**- dated August 11, 2023, prepared by Palustris Environmental LLC, Electronically received June 13, 2024.
- **Regulated Water Investigation Report** – (Franz-Shemashko Property) dated August 16, 2023, prepared by Palustris Environmental LLC, Electronically received June 13, 2024.
- **Post Construction Stormwater Management Report-** (Elmwood Park) dated November 2023, prepared Sheffler & Co., Inc., Electronically received June 13, 2024.
- **Post Construction Stormwater Management Report-** (Seneca Trails) dated November 2023, Prepared Sheffler & Co., Inc., Electronically received June 13, 2024.
- **Initial Erosion & Sediment Control Plan-** (ES1) – Seneca Trails Phases 3 & 4- dated August 22, 2023, prepared by Sheffler & Co. Inc., Electronically received June 13, 2024.
- **Tentative Plan Set**, dated July 5, 2024, prepared by Sheffler & Company, Inc. received July 3, 2024.
- **Half Size Drawings-** Final Subdivision & Land Development Plans- Seneca Trails Phases 3,4,&5, dated June 12, 2024, by Sheffler & Company, Inc; , Electronically received June 13, 2024, Final Re-submission Dated July 3, 2024, Received July 3, 2024.
- **Full Set Drawings- Final Subdivision & Land Development Plans-** Seneca Trails Phases 3, 4, & 5, dated June 12, 2024, prepared by Sheffler & Co. Inc., Electronically received June 13, 2024; Final Re-submission Dated July 3, 2024, received July 3, 2024.
  - Drawing Schedule: Title Sheet – (C000), Waiver List- (C001), Phasing Plan- (C150), Tree Clearing Plan- (C151), Steep Slope Disturbance Plan- (C152), Bufferyard Plan- (C153), Connectivity Plan- (C154), Open Space Plan-(C155), Existing Conditions Plan- PH 3&4 (PH3&4-100), PH5 (PH5-100), Simple Subdivision Plans -PH5 (PH5-REC100-103), Residential Subdivision Plan- PH3&4 (PH3&4-REC1-4), PH5 (PH5-REC1-3), Site Plan (Index)-PH3&4 (PH3&4-00), PH5 (PH5-200), Site Plans- PH3&4 (PH 3&4-200A-C) PH5 (PH5-200A-B), Street Profiles – PH3&4 (PH3&4-210-213), PH5 (PH5-210-211), Grading and Drainage Plan (Index) – PH3&4 (PH3&4-300), PH5 (PH5-300), Grading and Drainage Plans- PH3&4 (PH3&4-300-C) PH5 (PH5-300A-B), Storm Sewer Plan- PH5 (PH5-400A-B), Storm Sewer Profiles- PH3&4 (PH3&4-310-315) PH5 (PH5-410-412), Sanitary Sewer and Utility Plan (Index)- PH3&4 (PH3&4-400) PH5 (PH5-500), Sanitary Sewer and Utility Plans -PH 3&4 (PH3&4-400A-C) PH5 (PH5- 500A-C), Sanitary Sewer Profiles- PH3&4 (PH3&4-410-413) PH5 (PH5-510-512), Utility Plan (Index)- PH3&4 (PH3&4-600) PH5 (PH5-600), Utility Plan PH3&4 (PH3&4-600A-C) PH5 (PH5-600A-B), General Notes- PH5 (C700), Construction Details- PH5 (C700A-G), Building Elevations- PH3&4 (PH3&4-800-801), PH5 (PH5-800), Landscape Plan (Index)- PH3&4 (PH3&4-1000) PH5 (PH5-1000), Landscape Plan – PH3&4 (PH3&4-1000-A-C) PH5 (PH5-1000A-B), Lighting Plan (Index)- PH5 (C1200), Lighting Plan – PH5 (C1200A), Lighting Details- PH5 (C1200B), Initial Erosion & Sedimentation Control Plan (Index)- PH3&4 (PH3&4-ES1) PH5 (PH5-ES1), Initial Erosion & Sedimentation Control Plan -PH3&4 (PH3&4-ES2-3) PH5 (PH5-ES2-3), Intermediate Erosion & Sedimentation Control Plan (Index)- PH3&4 (PH3&4-ES4),

Intermediate Erosion & Sedimentation Control Plan – PH3&4 (PH3&4-ES5-7), Final Erosion & Sedimentation Control Plan (Index)- PH3&4 (PH3&4-ES-8) PH5 (PH5-ES-4), Final Erosion & Sedimentation Control Plan – PH3&4 (PH3&4-ES9-11) PH5 (PH5-ES5-6),  
Erosion & Sedimentation Control Notes & Details- PH 3&4 (PH3&4-ES12-15) PH5 (PH5-ES7-10), Overall Post Construction Stormwater Management Plan- PH3&4 (PH3&4-PCSM1) PH5 (PH5-PCSM1), Post Construction Stormwater Management Plan- PH3&4 (PH3&4-PCSM2-4) PH5 (PH5-PCSM2-3), Post Construction Stormwater Management Details- PH3&4 (PH3&4-PCSM5) PH5 (PH5-PCSM4).

The plans are subject to the following conditions:

1. **Township Planning Director’s Review Letter.** The Developer shall address all outstanding issues and deficiencies referenced in the Township Planning Director’s review letter dated June 26, 2024, in a manner acceptable to the Township Planning Director.
  1. All existing limestone trails, the trail from Community Open Space to Lot 233 at Blake Drive, and all trails leading to community open space shall be constructed to the Township's Construction Standards. Where referenced in this section, Township Construction Standards or standards shall be taken to mean a six-inch 2A limestone base, trail six feet in minimum width, and three inches of compacted AASHTO #10 stone on top. Sheet C154 needs updated to reflect these conditions and should show the easement for the trails on the recording plan.
  2. A trail easement, as specified by the Township Construction Standards, shall be added to connect Phase 5 to the adjacent property, parcel number 180-4F123-5, for future connection to be depicted as an easement for public use.
  3. The submission will require updated homeowner’s documents with the substance of covenants, grants of easement, right-of-way or other restrictions proposed to be imposed upon the use of the land, common open space, buildings and structures, including proposed easements or grants for public utilities. [§27-1105.B(2)(g), 22-402.C(12),(17)]
  4. A full set of the revised tentative plans must be submitted with all updates to be kept as record.
2. **Gudekunst Road Improvements.** As a condition for Phase 5, the Developer is responsible for and widening of Gudekunst Road to 20’ and the improvements shall meet township standards. The Developer shall provide details on the timing and specifications of the improvements to the road.
3. **Intersection of Gudekunst Road and Shanleigh Drive.** The study does not address the current sight distance at the intersection of Gudekunst Rd & Shanleigh Drive. Previous submissions had indicated this intersection would meet ISD for 25 MPH and sight distance was to be confirmed prior to occupancy. HRG measured ISD and found the available sight distance does not appear to meet ISD for 25 MPH looking left out of the driveway and looking ahead while turning left into the driveway. Further coordination with the Township on possible road or embankment adjustments should be considered to obtain sight distance.

The Developer shall work with Township and Township Engineers to survey the area and come up with a solution on how to make the sight distance acceptable for safety measures.

4. **Failure to Comply.** Failure to comply with the terms and conditions of the Tentative approval granted by the Board of Supervisors shall result in said approval null and void as specified in the Findings of Fact and Conclusions of Law dated November 21, 2021, and May 23, 2024.
5. **Conditions of Approval.** The Developer shall reference on the recording plat the conditions of approval of this plan and waiver approvals, in a manner acceptable to the Township Solicitor. The Developer shall satisfy the conditions of this approval in a manner acceptable to the Township Manager by no later than one year from the date of approval, except as provided by applicable law.
6. **Compliance with Laws.** The Developer and the development of the subject property shall comply with all applicable Federal, State, County and Township laws, statutes, ordinances, resolutions and regulations, including but not limited to Chapter 27 of the Jackson Township Code of Ordinances, Zoning, as amended (the “Zoning Ordinance”), Chapter 22 of the Jackson Township Code of Ordinances, Subdivision and Land Development, as amended (the “SALDO”), and Chapter 26, Part 1 of the Jackson Township Code of Ordinances, Stormwater Management, as amended (the “SWMO”).
7. **Permits and Approvals.** The Developer shall apply for and obtain any and all necessary Federal, State, County and Township permits and approvals for the proposed development on the subject property. The Developer and the development of the subject property shall comply with all such Federal, State, County and Township permits and approvals.
8. **Unit Owners Association Documents.** The Developer shall establish a unit owners association for the PRD in accordance with the applicable requirements of the Pennsylvania Uniform Planned Community Act, 68 Pa.C.S. §5101 et seq., as amended, and/or the Pennsylvania Uniform Condominium Act, 68 Pa.C.S. §3101 et seq., as amended. The organizing documents and declarations for this unit owner’s association shall comply with this decision and shall be in a form acceptable to the Township Solicitor, and the Developer shall comply with the terms of these organizing documents and declarations.
9. **Emergency Access.** The Developer shall provide adequate access for emergency vehicles and emergency responders in a manner acceptable to the Township Police Chief and Fire Chief. The Developer shall address all comments from the Township Police Chief and Fire Chief in a manner acceptable to the Township.
10. **Development Agreement.** The Developer shall execute the Township’s standard-form Development Agreement, in a form acceptable to the Township Solicitor, and post the necessary financial security in a form acceptable to the Township Solicitor. The Developer shall comply with the Development Agreement executed between the Developer and the Township.
11. **Stormwater Management Agreement.** The Developer shall construct, install, operate, and maintain the stormwater management system and related appurtenances for the development in accordance with the SWMO. The Developer shall execute the Township’s standard-form Stormwater Management Agreement, in a form acceptable to the Township Solicitor. The

Developer shall comply with the Stormwater Management Agreement executed between the Developer and the Township.

12. **Reimbursement of Township Review Fees and Expenses.** The Developer shall reimburse the Township for all Engineer, Solicitor and other professional consultant fees and all other expenses incurred by the Township as a result of the proposed [subdivision and/or land development] on the subject property.

The Board's actions dealt only with the above-referenced Final Phases 3, 4 & 5, Planned Residential Development, for Seneca Trails approval under the SALDO. The Developer must still comply with any and all applicable Township land use decisions, Township land use, building and other codes and apply for and obtain any and all necessary grading, building, and other permits from the Township Manager, Zoning Officer and Building Code Official.

Sincerely,



Nikki Colton  
Township Manager/Planning Director

*Via Email 7/31/2024*

CC: Gregg Heinemann  
Ed Moore, Sheffler & Company, Inc.  
Ben Gilberti, HRG

**Estimated Annual Revenue and Expense  
in Application Territory  
Water**

Line No.		Phase 1B		Phase 3			Phase 4			Phase 5		Total Phase 1B, 3, 4, & 5
		47 Residential Customers	2 Public Fire Hydrants	45 Residential Customers	52 Residential Customers	5 Public Fire Hydrants	60 Residential Customers	49 Residential Customers	2 Public Fire Hydrants	66 Residential Customers	3 Public Fire Hydrants	319 Residential Customers 12 Public Fire Hydrants
1	<b>Annual Revenue</b>											
2	Meter Size	1"		5/8"	1"		5/8"	1"	5/8"			
3	Average Monthly Usage (100 Gallons)	32.01		32.01	32.01		32.01	32.01	32.01			
4	Monthly Service Charge	\$18.80	\$22.86	\$18.80	\$18.80	\$22.86	\$18.80	\$18.80	\$22.86	\$18.80	\$22.86	
5	Usage Charge per 100 Gallons	\$1.8772		\$1.8772	\$1.8772		\$1.8772	\$1.8772	\$1.8772			
6	Usage Charge	\$60.09		\$60.09	\$60.09		\$60.09	\$60.09	\$60.09			
7	Monthly Total Revenue	\$78.89	\$22.86	\$78.89	\$78.89	\$22.86	\$78.89	\$78.89	\$22.86	\$78.89	\$22.86	
8	Annual Revenue per Customer (Ln. 7 x 12 months)	\$946.68	\$274.32	\$946.68	\$946.68	\$274.32	\$946.68	\$946.68	\$274.32	\$946.68	\$274.32	
9												
10	Estimated Annual Residential Revenue	\$44,493.96		\$42,600.60	\$49,227.36		\$56,800.80	\$46,387.32		\$62,480.88		
11	Estimated Annual Public Fire Hydrants Revenue		\$548.64			\$1,371.60			\$548.64		\$822.96	
12												
13	<b>Total Estimated Annual Revenues</b>										\$305,282.76	
14												
15	<b>Estimated Annual Expenses</b>											
16												
17	Estimated Annual Expenses (319 Residential Customers)	\$8,969.98		\$8,588.28	\$9,924.24		\$11,451.04	\$9,351.68		\$12,596.15		
18	Estimated Annual Expenses (12 Public Fire Hydrants)		\$110.61			\$276.51			\$110.61		\$165.91	
19												
20	<b>Total Estimated Expenses Per Year</b>										\$61,545.01	
21												
22	<b>Net Income (Ln. 13 - Ln. 20)</b>										\$243,737.75	

Second Amended Exhibit K-Revised

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

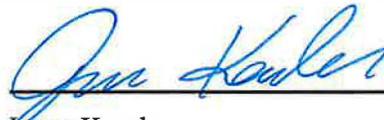
Application of Pennsylvania-American Water Company for the approval of the right to  
offer, render, furnish and supply water service to the public in an additional portion  
Jackson Township, Butler County, Pennsylvania

Docket No. A-2025-3055966

VERIFICATION

I, Jason Kessler, hereby state that the facts set forth in Pennsylvania-American Water Company's Responses, and accompany exhibits, if any, to the Bureau of Technical Utility Services, Set 4, dated October 22, 2025, are true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Dated: November 5, 2025



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Jason Kessler  
Senior Superintendent Operations  
Operations Western Pennsylvania-Northwest  
Pennsylvania-American Water Company

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania-American Water :  
Company for the approval of the right to offer, :  
render, furnish and supply water service to the : Docket No. A-2025-3055966  
public in an additional portion Jackson :  
Township, Butler County, Pennsylvania :

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of Pennsylvania-American Water Company's Responses to the Bureau of Technical Utility Services Data Request, Set 4, 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**

Darryl Lawrence  
Consumer Advocate  
PA Office of Consumer Advocate  
555 Walnut Street, 5th Floor, Forum Place  
Harrisburg, PA 17101-1923  
(via electronic mail – [ra-oca@paoca.org](mailto:ra-oca@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](mailto: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](mailto:akaster@pa.gov))

Dated: November 5, 2025



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Erin K. Fure (PA ID# 312245)  
Director, Corporate Counsel  
Pennsylvania-American Water Company  
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[erin.fure@amwater.com](mailto:erin.fure@amwater.com)