



Erin K. Fure
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December 26, 2025

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

In re: Application of Pennsylvania-American Water Company for Approval of the Right to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Newberry Township, York County, Pennsylvania (Southern Crossing Development)

Docket No. A-2025-3057974

Dear Secretary Homsher:

In your response to your Secretarial Letter of December 2, 2025, attached for filing is Pennsylvania-American Water Company's responses to Data Request Set I, regarding the above referenced proceeding.

Should you have any questions, please feel free to contact me.

Sincerely,

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

Erin K. Fure

cc: All Parties on the attached Certificate of Service (*via electronic mail*)
James Kennedy, Bureau of Technical Utility Services (*via electronic mail*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Pennsylvania-American Water Company for Certificate of Public Convenience for Approval of the Right to Offer, Render, Furnish and Supply Wastewater Service to the Public in Additional Portion of Newberry Township, York County, Pennsylvania (Southern Crossing Development)	: : : : : : : : : :	Docket No. A-2025-3057974
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CERTIFICATE OF SERVICE

I hereby certify that I am on this day serving the above-referenced Pennsylvania-American Water Company's **Responses to Set I** in the above-referenced matter upon the persons and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

SERVICE VIA ELECTRONIC MAIL ON DECEMBER 26, 2025

Darryl A. Lawrence, Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
ra-oca@paoca.org

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

Alison Kaster, Director
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
PO Box 3265
Harrisburg, PA 17105
akaster@pa.gov

Dated: December 26, 2025

Respectfully submitted,



Erin K. Fure, Esquire (PA ID #312245)
Director, Corporate Counsel for
Pennsylvania-American Water Company
852 Wesley Drive
Mechanicsburg, PA 17055
Phone: 717-550-1556

**Attorney for *Pennsylvania-American
Water Company***

Application of Pennsylvania-American Water Company – Wastewater Division for approval of the right to offer, render, furnish or supply wastewater service to the public in an additional portion of Newberry Township, York County, Pennsylvania

Docket No. A-2025-3057974

PAWC's Responses to Set I

A-1. In Section 10 of the Application, PAWC-WD indicated that the requested territory will generate an average wastewater flow of 23,175 gallons per day. Please quantify the projected average daily organic load from the requested territory at full buildout

Response: Based on the 2024 Chapter 94, 5-year average loading of 0.400 lb/day the projected loading is 79.6 lbs/day.

Responsible Witness: Stephen DiFriece, Engineering Project Manager
Pennsylvania-American Water Company

Date: December 26, 2025

Application of Pennsylvania-American Water Company – Wastewater Division for approval of the right to offer, render, furnish or supply wastewater service to the public in an additional portion of Newberry Township, York County, Pennsylvania

Docket No. A-2025-3057974

PAWC's Responses to Set I

A-2. In Section 19 of the Application, PAWC-WD indicated that furnishing wastewater service in the requested territory will have no adverse effect upon the service furnished or the rates charged to other customers. Please explain how approval of the Application will benefit PAWC-WD's existing customers.

Response: Approval of this application will result in more customers being connected to PAWC's wastewater system without significant upfront capital costs required by the Company. An increase in customers along this system will allow PAWC to divide the operating costs among more customers and keep rates lower for all PAWC customers.

Responsible Witness: Stephen DiFriece, Engineering Project Manager
Pennsylvania-American Water Company

Date: December 26, 2025

Application of Pennsylvania-American Water Company – Wastewater Division for approval of the right to offer, render, furnish or supply wastewater service to the public in an additional portion of Newberry Township, York County, Pennsylvania

Docket No. A-2025-3057974

PAWC's Responses to Set I

A-3. The Application's Exhibit L included a copy of an EDU Transfer Agreement between Escambia Properties, LLC (Developer) and Newberry Township which indicated that Newberry Township would amend its Act 537 Plan to indicate that the Southern Crossing Development (Development) would be served by PAWC-WD. Please provide a copy of the Department of Environmental Protection (DEP) approved Act 537 Planning Module for the Development and its associated DEP approval letter.

Response: Since the Newberry Township portion of this Development is Phase II, Escambia Properties, LLC currently is preparing the Newberry Township portion of the Act 537 Planning Module for submission.

Responsible Witness: **Stephen DiFriece, Engineering Project Manager
Pennsylvania-American Water Company**

Date: **December 26, 2025**

Application of Pennsylvania-American Water Company – Wastewater Division for approval of the right to offer, render, furnish or supply wastewater service to the public in an additional portion of Newberry Township, York County, Pennsylvania

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PAWC's Responses to Set I

A-4. As the Application's Exhibit I, PAWC-WD provided an Opinion of Probable Construction Costs (Cost Estimate), prepared by Integrated Consulting, that estimated \$7,617.05 for permits and inspections. Please provide a list of any permits required for PAWC-WD to provide wastewater service to the Development, the cost of those permits, and indicate which entity (e.g., PAWC-WD, Developer, etc.) will be responsible for the costs of each required permit.

Response: A list of required permits and associated cost have been added to the revised cost estimate. The Developer is responsible for all costs of each required permit and can be found at **A-4_Attachment**.

Responsible Witness: Stephen DiFriece, Engineering Project Manager
Pennsylvania-American Water Company

Date: December 26, 2025

In re: Application of Pennsylvania-American Water Company for Approval of the Right to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Newberry Township, York County Pennsylvania

Docket No. A-2025-3057974

A-4 Attachment

Updated Opinion of Probable Construction Costs

OPINION OF PROBABLE CONSTRUCTION COSTS

PROJECT NAME: Southern Crossings
 DESCRIPTION: Sanitary OPC
 PROJECT NO.: 21-0191
 PREPARED BY: MLS
 DATE PREPARED: 12-Dec-25



SANITARY SEWER (FAIRVIEW TWP.)	Quantity	Unit	x	Price	= \$	Cost
Tie in to Existing MH - Core Hole	1	EA	x	\$5,000.00	=	\$5,000.00
4" PVC Service Lateral	2460	L.F.	x	\$16.00	=	\$39,360.00
8" SDR-26 Mainline Piping	2878	L.F.	x	\$45.00	=	\$129,510.00
Manholes	19	EA	x	\$3,500.00	=	\$66,500.00
Cameron Rd. Ex. Manhole Rim Adjustment	2	EA	x	\$500.00	=	\$1,000.00
Cameron Rd. Ex. Cleanout Adjustment	2	EA	x	\$300.00	=	\$600.00
Stone Bedding Under Manholes	2	TONS	x	\$20.00	=	\$40.00
Stone Bedding and Initial Backfill	860	TONS	x	\$20.00	=	\$17,200.00
Fairview Twp. Sanitary Sewer Total						\$259,210.00
SANITARY SEWER (NEWBERRY TWP.)	Quantity	Unit	x	Price	= \$	Cost
Tie in to Existing MH - Core Hole	1	EA	x	\$5,000.00	=	\$5,000.00
4" PVC Service Lateral	2490	L.F.	x	\$16.00	=	\$39,840.00
8" SDR-26 Mainline Piping	2307	L.F.	x	\$45.00	=	\$103,815.00
Manholes (6-8" Depth)	13	EA	x	\$3,500.00	=	\$45,500.00
Concrete Encasements	5	EA	x	\$500.00	=	\$2,500.00
Stone Bedding Under Manholes	2	TONS	x	\$20.00	=	\$40.00
Stone Bedding and Initial Backfill	640	TONS	x	\$20.00	=	\$12,800.00
Newberry Twp. Sanitary Sewer Total						\$209,495.00
Fairview Twp. Sanitary Sewer Total					=	\$259,210.00
Newberry Twp. Sanitary Sewer Total					=	\$209,495.00
Sum of Site Work					=	\$678,200.00
Sewage Planning Exemption (Developer)					=	\$5,000.00
Preliminary/Final Plan Approval (Developer)					=	\$250,000.00
Individual NPDES Permit (Developer)					=	\$50,000.00
DEP/USACE Joint Permit (Developer)					=	\$75,000.00
Testing and Inspections (PAAW)					=	\$50,000.00
Contingency				10%	=	\$67,820.00
TOTAL ESTIMATED CONSTRUCTION COST						\$1,176,020

NOTES:

Application of Pennsylvania-American Water Company – Wastewater Division for approval of the right to offer, render, furnish or supply wastewater service to the public in an additional portion of Newberry Township, York County, Pennsylvania

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PAWC's Responses to Set I

A-5. The Cost Estimate does not identify the quantity, size, material type, or estimated cost of laterals from the wastewater main to the edge of the public right-of-way (CompanyOwned Laterals). Please provide an estimated cost for the proposed Company-Owned Laterals, broken down by quantity, size, and material type, and clarify if the estimated cost of Company-Owned Laterals was included in the Cost Estimate.

Responses: Please see **A-4_Attachment**.

Responsible Witness: **Stephen DiFriece, Engineering Project Manager
Pennsylvania-American Water Company**

Date: **December 26, 2025**

Application of Pennsylvania-American Water Company – Wastewater Division for approval of the right to offer, render, furnish or supply wastewater service to the public in an additional portion of Newberry Township, York County, Pennsylvania

Docket No. A-2025-3057974

PAWC’s Responses to Set I

A-6. The Preliminary/Final Subdivision & Land Development Plan, provided as the Application’s Exhibit D, indicated in the Plan Purpose on Page 1 that there will be 95 townhomes and five single-family residential lots reserved for future construction resulting in 100 total dwelling units. In Section 6 of the Application, PAWC-WD indicated that the Development will consist of 103 townhome units. Further, in the Application’s Footnote 3, PAWC-WD indicated that the development will be in portions of Newberry and Fairview Townships, with the portion in Fairview Township being in PAWC-WD’s existing certificated territory, and the requested territory being the portion of the Development in Newberry Township. Please separately identify the number and type (i.e. townhomes, single family homes) of anticipated customers in the requested territory and the Development, and, if necessary, provide a revised Exhibit P, estimated annual revenue and expenses for the requested territory.

Responses: The correct number of total dwellings is 100 homes in Fairview Township (Phase I) and 99 homes in Newberry Township (Phase II). Please see updated Exhibit P at **A-6_Attachment**.

Responsible Witness: Maggie Zhi, Principal Regulatory Analyst – Rate and Regulatory
American Water Works Service Company

Date: December 26, 2025

In re: Application of Pennsylvania-American Water Company for Approval of the Right to Offer, Render, Furnish or Supply Wastewater Service to the Public in an Additional Portion of Newberry Township, York County Pennsylvania

Docket No. A-2025-3057974

A-6 Attachment

Updated Exhibit P

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

Line No.		99 Residential Customers	Total
1	Annual Revenue		
2	Average Monthly Usage (100 Gallons)	3,168.99	
3	Monthly Service Charge	\$1,485.00	
4	Usage Charge per 100 Gallons	\$2.9539	
5	Usage Charge	\$9,360.88	
6	Monthly Total Revenue	\$10,845.88	
7	Annual Revenue per Customer (Ln. 6 x 12 months)	\$130,150.56	
8			
9	Total Estimated Annual Revenues	\$130,150.56	\$130,150.56
10			
11	Estimated Annual Expenses		
12			
13	Estimated Annual Expenses (99 Residentials)	\$26,863.08	\$26,863.08
14			
15	Net Income (Ln. 9 - Ln. 13)		\$103,287.48

Exhibit P

VERIFICATION

I, Maggie Zhi hereby state that the facts above set forth in the attached Responses 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 made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.

_____*Maggie Zhi*_____

Maggi Zhi – Principal, Regulatory Analyst, Rates &
Regulatory
American Water Works Service Company

Dated: *12/26/2025*

VERIFICATION

I, STEPHEN A. DEFRIECE, hereby state that the facts above set forth in the attached Responses above 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 made herein are made subject to the penalties of 18 Pa. Cons. Stat. §4904 relating to unsworn falsification to authorities.

Stephen DeFriece

Stephen A. DeFriece, Staff Engineer
Pennsylvania-American Water Company

Dated: 12/26/2025