



February 25, 2026

Matthew L. Homsher, Esq., Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105-3265

Re: Annual Asset Optimization Plan for year ending December 31, 2025

Dear Mr. Homsher:

Attached please find our Annual Asset Optimization Plan for year ending December 31, 2025. The plan also provides projections for the period ending December 31, 2026.

Our 2025 Lead Service Line Replacement Program Report is included in this Annual Asset Optimization Plan.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "David Lewis", is written over a light blue circular watermark.

David T. Lewis, P.E.  
President and  
General Manager

email Copy: John Van Zant  
Kenneth Shaffer

**Columbia Water Company**

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# COLUMBIA WATER COMPANY

## 2025 Annual Asset Optimization Plan

The Columbia Water Company (“CWC” or “Company”) is submitting this Annual Asset Optimization Plan (“AAOP”) in accordance with the requirements for the Long Term Infrastructure Improvement Plan (“LTIIIP”) as filed on August 26, 2022 in accordance with the requirements of 66 Pa. C.S. §§ 1350 - 1360 and the Public Utility Commission’s Final Order for the Implementation of Act 11 of 2012 (Public Meeting of August 2, 2012, Docket No. M-2012-2293611). The Company’s LTIIIP covers infrastructure investment through its established Distribution System Improvement Charge (“DSIC”). The Company received Commission approval of its LTIIIP on December 8, 2022 in Docket No. P-2022-3034702.

Consistent with the Commission’s Lead Service Line Replacement Regulations, on July 21, 2023 a Modified LTIIIP was filed with the PUC as part of the Company’s Petition for Lead Service Line Replacement Program at Docket No. P-2023-3041845. The Modified LTIIIP was approved by the PUC on October 10, 2024 and the Order was entered on November 1, 2024 pending a review by the Bureau of Technical Service. A final Order was adopted and entered on October 9, 2025 and the proceeding was closed.

### I. INTRODUCTION

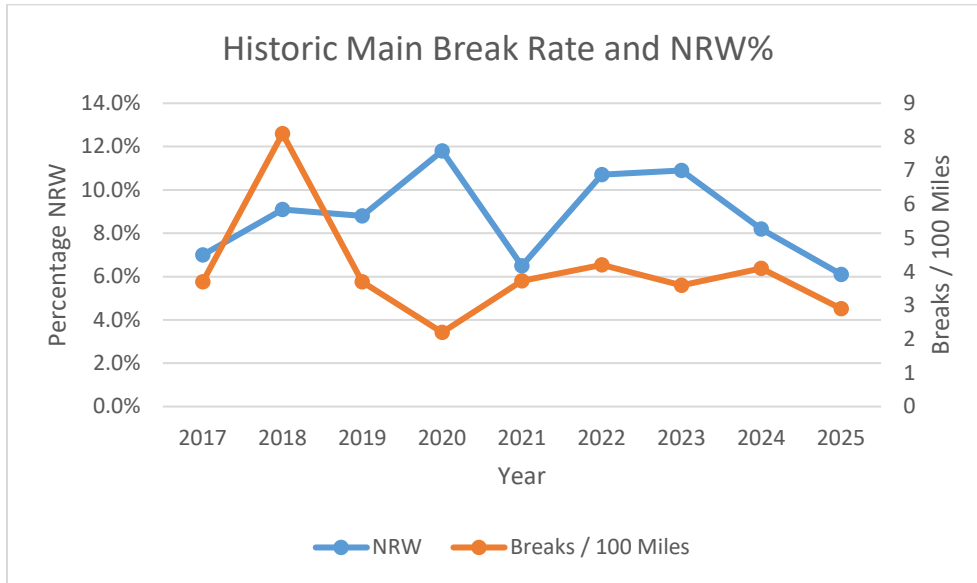
The Columbia Water Company provides public water service to residential, commercial, public and industrial customers in Columbia, Marietta and Mountville Boroughs, and in West Hempfield, Manor, East Donegal and Hellam Townships, Lancaster and York Counties, Pennsylvania. The Columbia Water Company served 12,302 customers at the end of year 2025. The distribution system is comprised of water mains that vary in size from 4-inch through 16-inch with the material type being mainly cast iron and ductile iron. There is approximately 172.4 miles of water main, 12,302 service lines, 3,562 valves, 1,022 hydrants and 12,302 meters.

Under Commission regulations, a utility with an approved DSIC shall file an AAOP with the Commission. The AAOP must include a description the specifies all the eligible property repaired, improved, and replaced in the prior 12-month period under its LTIIIP and a description of the eligible property to be repaired, improved and replaced in the upcoming 12-month period.

### II. NON-REVENUE WATER AND MAIN BREAK RATES

In accordance with paragraph 2 in the Opinion and Order at Docket P-2022-3034702, below is a report of both non-revenue water (NRW) and main break rates. As the data shows, Columbia Water Company is regularly operating well below the industry standard of 20 percent NRW. Further, according to *Water Main Break Rates in the USA and Canada: A Comprehensive Study* prepared by Utah State University in 2018, water main break rates in the United States and

Canada are 14 breaks/100 miles/year; *water main break rates are typically twice that rate for smaller utilities* [like Columbia Water Company]. Columbia Water Company is operating well below the threshold of 14 Breaks per 100 miles. Of course, it is known that there is no correlation between non-revenue water and main replacement programs since unique events or adaptive flushing programs can have significant one-time impacts to non-revenue water rates in any given year. Columbia Water Company’s main breaks number in the single digits annually, so one break more or less in a given year, changes the main break rate significantly.



### III. ELIGIBLE PROPERTY REPAIRED, IMPROVED AND REPLACED IN THE PRIOR 12-MONTH PERIOD

CWC filed its First LTIP on February 21, 2017 and received approval on June 14, 2017. CWC filed a modification of its LTIP on August 21, 2018 and received approval on December 6, 2018. CWC filed its Second LTIP on August 26, 2022 and received approval on December 8, 2022. CWC filed a modified LTIP on July 21, 2023 and received approval on October 9, 2025.

The information below presents a comparison of CWC’s budgeted expenditures and quantities to actual.

**Table 1 – 2025 Planned versus Actual Quantities**

Year	Mains (ft.)		Services (ea.)		Hydrants/Valves (ea.)		Meters (ea.)	
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual
2025	1,200	1,520	30	77*	8	8	140	111

\*- 40 of the 77 service line replacements were lead service lines.

**Table 2 – 2025 Planned versus Actual Expenditures**

2025 LTIP Expenditures		
Repaired, Improved or Replaced		
Description	Budget	Actual
Mains	\$160,000	\$173,390
Service	\$145,000	\$130,968
Valves	\$15,000	\$14,804
Hydrants	\$10,000	\$17,235
Meters	\$50,000	\$44,878
<b>Total</b>	<b>\$380,000.00</b>	<b>\$381,275</b>

52 Pa. Code § 121.2.

The LTIP regulation specifically refers to a 20% increase in the total estimated cost of the LTIP to mean a major modification has occurred and triggers the requirement for a submission of a petition for a major modification to the LTIP. CWC’s total LTIP spending in 2025 was 19.3% above the projected spending. The 19.3% increase can be attributed to the inflationary pressures in our economy and due to the replacement of lead service lines.

20% variations, particularly between categories of eligible property, are nearly impossible for CWC to avoid due to its smaller size and CWC’s choice to ensure efficiency by scheduling its projects in conjunction with municipal road and other construction projects which the Commission encourages. *See* 52 Pa. Code § 121.3(a)(8).

**IV. ELIGIBLE PROPERTY TO BE REPAIRED, IMPROVED AND REPLACED IN THE UPCOMING 12-MONTH PERIOD**

In the upcoming 12-month period ending December 31, 2026, the Company expects to make the following repairs, improvements or replacements:

**Table 3 – Planned Quantities of Repairs, Improvements and Replacements for year ending December 31, 2026**

Year	Mains	Services	Valves/Hydrants	Meters
2026	1,200	50	8	140

**Table 4 – Planned Expenditures for Repairs, Improvements and Replacements for year ending December 31, 2026**

Description	2026 Projections
Mains	\$160,000
Service	\$145,000
Valves	\$15,000
Hydrants	\$10,000
Meters	\$50,000
<b>Total</b>	<b>\$380,000</b>

## V. LEAD SERVICE LINE REPLACEMENT PROGRAM REPORT

The Lead Service Line Replacement Plan at Docket No. P-2023-30418445 was adopted and entered on October 9, 2025

### 1. Number of Lead or GRR Service Lines Replaced in 2025:

39 service lines.

### 2. Length of Lead Removed from the System in 2025:

Size of Service Line	Length of Lead Removed from System
¾" Diameter	823 feet
1" Diameter	40 feet

### 3. Length, Pipe Diameters, and Material Types of LSLRs:

Pipe Diameter	Material Type	Length
¾" Diameter	Copper	707 feet
1" Diameter	Copper	15 feet
¾" Diameter	HPDE	130 feet
1" Diameter	HPDE	25 feet

### 4. Actual Cost of Each LSLR by Water System:

No.	Address	Material	Ownership	Cost
1	955 WALNUT ST	Lead	Company	\$2,203.95
2	953 WALNUT ST	Lead	Company	\$2,203.95
3	945 WALNUT ST	Lead	Company	\$2,212.63
4	935 WALNUT ST	Lead	Company	\$2,219.92
5	911 WALNUT ST	Lead	Company	\$2,219.92
6	911 WALNUT ST	GRR	Customer	\$2,389.86
7	634 S 12TH ST	Lead	Company	\$2,224.39
8	632 S 12TH ST	Lead	Company	\$2,409.23
9	324 N 4TH ST	Lead	Company	\$2,391.06
10	128 S 2ND ST	Lead	Customer	\$2,231.79
11	300 PERRY ST	Lead	Customer	\$2,355.84
12	101 N WATERFORD	GRR	Customer	\$2,247.39
13	6 CEDAR TERRACE	GRR	Customer	\$2,376.54
14	564 E FRONT ST	GRR	Customer	\$2,184.61
15	15 S NEW HAVEN ST	GRR	Customer	\$2,253.01
16	127 N GAY ST	GRR	Customer	\$2,197.35
17	842 LOCUST ST	Lead	Customer	\$2,418.73
18	801 WALNUT ST	Lead	Customer	\$2,295.73

19	763 WALNUT ST	GRR	Customer	\$2,179.92
20	233 LOCUST ST	Lead	Customer	\$2,231.37
21	118 N 6TH ST	Lead	Customer	\$2,283.49
22	750 LOCUST ST*	Lead	Company	\$2,435.10*
23	744 LOCUST ST*	Lead	Company	\$2,688.95*
24	740 LOCUST ST*	Lead	Company	\$2,435.10*
25	746 LOCUST ST*	Lead	Company	\$2,435.10*
26	738 LOCUST ST*	Lead	Company	\$2,658.95*
27	729 LOCUST ST*	Lead	Company	\$2,653.92*
28	739 LOCUST ST*	Lead	Company	\$2,322.24*
29	743 LOCUST ST*	Lead	Company	\$2,322.24*
30	731 LOCUST ST*	Lead	Company	\$2,398.67*
31	745 LOCUST ST*	Lead	Company	\$2,398.67*
32	1460 MANOR ST	GRR	Customer	\$2,085.19
33	751 LOCUST ST*	Lead	Company	\$2,430.16*
34	754 LOCUST ST*	Lead	Company	\$2,435.10*
35	753 LOCUST ST*	Lead	Company	\$2,405.95*
36	759 LOCUST ST*	Lead	Company	\$2,398.67*
37	734 LOCUST ST*	Lead	Company	\$2,127.92*
38	734 LOCUST ST	Lead	Customer	\$2,461.09
39	756 LOCUST ST*	Lead	Company	\$2,464.24*
40	807 CHESTNUT ST	Lead	Customer	\$2,343.52

\* Pavement restoration will occur in 2026 and the costs shown do not include those future restoration costs.

Note: The 40 lead service line replacements listed above breakdown as follows: 24 Company owned LSLs, 8 Customer owned LSLs and 8 Customer owned GRRs.

**5. Average Cost of an LSLR by Water System:**

\$2,400.81 per service line.

**6. Total Annual LSLR Expenditures by Customer Class:**

Residential: \$93,631.47

Commercial: \$0.00

Industrial: \$0.00

Public: \$0.00

**7. Total Projected LSLR Expenditures for 2026:**

\$80,000.

**8. Entities Outreach and Coordination Activities with Other Entities:**

- Coordination with NAWC Members regarding best practices.
- Provided lead information in our annual mailer to every customer.
- Publicized information on our website.

**9. Number of LSLR Refusals:**

Zero.

**10. Lead Monitoring Requirements Established by DEP:**

Mailed annual notice to customers with unknown, GRR and lead service lines. LSLR sampling was performed within the expected timeframe. Proper communication was held with consumers and property owners prior to and after LSLRs. Consumer notices were provided and distribution of filter-pitchers occurred. DEP was provided with a Classification Certification Form for both systems.

**11. Compliance with Requirements from EPA and DEP; Describe any violations associated with lead:**

Columbia Water Company has met the regulatory requirements established by the EPA and DEP. There have been no violations for 2025 associated with lead.

**12. Current Status of Service Line Inventory Efforts:**

Non-Lead Service Lines: 10,994.  
Unknown Service Lines: 1,219.  
Lead Service Lines: 6.  
GRR Service Lines: 2.

**13. Efforts to Obtain Grants, Loans, and Donations for LSLRs**

At this time, the lead service lines that have been identified are widely dispersed throughout the distribution system and are not concentrated within a definable project area. As a result, it is difficult to aggregate enough replacements into a single project that would be suitable for a dedicated loan or grant.

## VERIFICATION

I, David T. Lewis, on behalf of Columbia Water Company, 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 in this matter. This verification is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



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David T. Lewis, P.E.  
President and General Manager  
Columbia Water Company