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February 26, 2026

Via eFiling Only

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

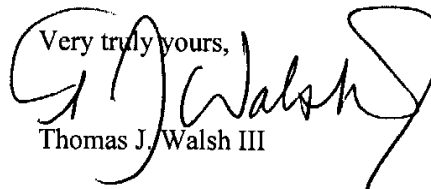
**RE: Newtown Artesian Water Company
Annual Asset Optimization Plan for Year Ended December 31, 2025
Docket No. M-2026-_____**

Dear Secretary Homsher:

Please be advised that I am general counsel to Newtown Artesian Water Company, Inc. (“NAWC”), in the above-referenced matter. By electronic filing, I am submitting NAWC’s 2025 Annual Asset Optimization Plan (“AAOP”). The AAOP is being filed in accordance with NAWC’s Long Term Infrastructure Improvement Plan (the “LTIIIP”) for water service approved at Docket No. P-2021-3028377, as well as 52 Pa. Code §121.6.

The AAOP provides details on the Distribution System Improvement Charge (“DSIC”) eligible property repaired, improved and replaced in 2025, as well as NAWC’s plans to repair, improve and replace DSIC-eligible property in 2026. The AAOP also (a) provides a table and narrative summary of the adjustments made to the LTIIIP; (b) updates the status of NAWC’s pending Lead Service Line Replacement Program; and (c) reports details on non-revenue water, and service line and main breaks for 2025.

Thank you for your assistance in this matter. If you have any questions or require any information relating to this filing, please feel free to contact me.

Very truly yours,

Thomas J. Walsh III

Enclosure

cc: Bureau of Technical Utility Services (via email, w/enc.)
Bureau of Investigation and Enforcement (via email, w/enc.)
Office of Consumer Advocate (via email, w/enc.)
Office of Small Business Advocate (via email, w/enc.)
Daniel Angove (via email, w/enc.)
R. Scott Hughes, P.E. (via email, w/enc.)

NEWTOWN ARTESIAN WATER COMPANY

Annual Asset Optimization Plan For Year Ended December 31, 2025

1.0. PURPOSE / INTRODUCTION

Newtown Artesian Water Company (“NAWC”) is submitting its Annual Asset Optimization Plan (“AAOP”) in accordance with Section 1356 of the Public Utility Code and NAWC’s current Long Term Infrastructure Improvement Plan (the “LTIIIP”). The LTIIIP covers the years 2022 through 2026. The LTIIIP was submitted to the Commission on September 3, 2021. The Commission approved the LTIIIP by Order dated December 16, 2021, at Docket No. P-2021-3028377.

Section 1356 of the Public Utility Code provides that a utility with an approved DSIC¹ and LTIIIP shall file an AAOP on an annual basis. Section 121.6 of Title 52 of the Pennsylvania Code, 52 Pa. Code § 121.6, states that an AAOP must include the following:

1. A description that specifies all the eligible property repaired, improved, and replaced in the prior 12-month period under its LTIIIP and prior year’s AAOP.
2. A description of the eligible property to be repaired, improved, and replaced in the upcoming 12-month period under the LTIIIP.

This AAOP provides information and details on all the DSIC-eligible property repaired, improved and/or replaced by NAWC under its LTIIIP and the prior year’s AAOP for (a) the reporting period beginning January 1, 2025, and ending December 31, 2025; and (b) projections for the upcoming year beginning January 1, 2026, and ending December 31, 2026. See 52 Pa. Code §121.6(b).

This AAOP also provides information and details on all the other DSIC-eligible property repaired, improved, and/or replaced by NAWC that was not included on its LTIIIP as originally approved or adjusted by a prior year’s AAOP during the 12-month period ending December 31, 2025.

This AAOP also includes (i) an analysis of NAWC’s adjustments to the LTIIIP through prior years’ AAOPs and this AAOP; (ii) an update of NAWC’s lead service line replacement program; and (iii) non-revenue water and main break occurrences for 2025.

¹ NAWC’s DSIC was first approved effective January 1, 1999.

2.0. BACKGROUND / APPROVED LTIIP

NAWC is a public utility that supplies water service in Pennsylvania subject to the Commission's regulatory jurisdiction. NAWC was incorporated in Pennsylvania in 1888 and currently serves approximately 10,736 customers in its service territory consisting of Newtown Borough, Newtown Township, and the northern portion of Middletown Township, Bucks County.² NAWC's water distribution system includes approximately 137 miles of main; 4 distribution storage tanks; 3,350 valves; 1,049 hydrants; and 10,467 meters.

NAWC's water system is supplied by three (3) active groundwater sources located within the NAWC service territory. In addition, NAWC has two (2) groundwater wells designated by the Pennsylvania Department of Environmental Protection ("PADEP") as being in "Reserve" status. Besides the groundwater wells, NAWC water supply sources include two (2) purchased water interconnections: (1) with the Bucks County Water and Sewer Authority ("BCWSA"); and (2) with the Pennsylvania American Water Company ("PAWC").

As approved, the LTIIP set forth the following:

1. Identified six (6) water main replacement projects with 9,030 linear feet (LF) of main (including tie-ins) over the 2022-2026 time period. NAWC prioritizes replacing the mains that are high-risk (asbestos cement pipe (ACP) and cast iron pipe (CIP)), problematic and/or undersized.
2. Reaffirmed NAWC's commitment to (a) replacing approximately 5 hydrants each year; and (b) replacing approximately 500 meters per year, consistent with NAWC's 20 year automated meter reading replacement program (which began in 2016).
3. Targeted annual average annual DSIC-eligible spending of \$663,611, for a total of \$3,318,058 over the LTIIP's 5-year term.

3.0. ELIGIBLE PROPERTY REPAIRED, IMPROVED, AND REPLACED IN THE PRIOR TWELVE (12) MONTH PERIOD (I.E., 2025).

The information presented below compares NAWC's LTIIP projects and budgeted expenditures, as amended by its prior years' AAOPs, to actual 2025 LTIIP projects and

² NAWC's service territory also includes an unserved part of southern Wrightstown Township, Bucks County, specifically the former Bucks County Tax Map Parcel Nos. 53-12-92 and 53-12-92-1. NAWC's Certificate of Public Convenience granting it the right to include this section of Wrightstown Township in its service territory was approved by the Commission on June 26, 2003, at Docket Number A-212070F0003.

expenditures. The information also presents details on other DSIC-eligible property repaired, improved and/or replaced by NAWC during the 12 month period ending December 31, 2025.

Table 1 on the following page presents the LF of water main replaced by NAWC in 2025. NAWC’s LTIIP, as modified by prior AAOPs approved by the Commission, did not propose any main replacement projects for 2025. Consistent with the LTIIP, NAWC did not replace any water main on its LTIIP specific projects in 2025.

Due to a developer project impacting an existing old and undersized main on West Centre Avenue in Newtown Borough, NAWC replaced a 74 year old main (1952 vintage) to improve hydraulic capacity, fire flows and resiliency in that area. The West Centre Avenue project involved the retirement of 238 LF of 6-inch CIP and the installation of 238 LF of 8-inch ductile iron pipe (DIP). As part of the West Centre Avenue main replacement, 6 services and 4 valves were replaced and/or added.

Table 1 – 2025 Water Main Replacements

Year	Projected Linear Feet of Main to be Replaced
	None
2025	Actual Linear Feet of Main Replaced
	238 LF of 6-inch CIP

Table 2 below compares projected replacement and installation of eligible “appurtenances,” specifically services, valves, hydrants, meters, and meter transceiver units (MXU) that were to be addressed under the LTIIP and prior year AAOPs, with the actual number of appurtenances replaced and installed in 2025. Meter replacements and MXU installations are independent of main replacement and extension projects and are based on NAWC’s meter replacement program and schedule. Non-LTIIP blowoff replacements completed in 2025 are also reported.

Table 2 – 2025 Appurtenances Replacement and/or Installation

Year	Services		Valves		Hydrants		Meters		MXUs		Blowoffs	
	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual	Planned	Actual
2025	0	0	0	0	5	5	500	487	500	845	5	5

NAWC completed five (5) hydrant replacements (LTIIIP projects) and five (5) blowoff replacements (non-LTIIIP projects) within the overall system in 2025. A total of 487 meters and 845 MXUs were replaced and/or installed in 2025. The reason for the greater number of MXU than meter installations is due to NAWC’s continued focus on accelerating the transition to monthly meter reading and billing for its residential customers.

As part of the West Centre Avenue project, three (3) one (1) inch service lines were replaced with 1-inch copper services. In addition, one (1) 6-inch fire service line was replaced in kind, and two (2) new 8-inch fire service lines were installed. There were no NAWC-owned or customer-owned lead service lines encountered in connection with the West Centre Avenue project. Four (4) valves were installed as part of the West Centre Avenue project, including two (2) replacements. There were no fire hydrants replaced as part of this project.

Table 3 below compares the projected budgeted expenditures from the LTIIIP and prior year’s AAOPs with NAWC’s actual DSIC eligible asset additions placed in service in 2025 for both LTIIIP and non-LTIIIP based projects.

Table 3 – Projected v. Actual 2025 DSIC Eligible Expenditures

Project	2025 Projected Cost	2025 Actual Costs
West Centre Avenue ^(a)	\$0	\$124,870.33
Fire Hydrants (5 Replaced)	\$28,941	\$26,984.90
Blow-Offs (5 Replaced)	\$8,269	\$18,073.13
Meter Replacements and MXU Installations	\$231,525	\$303,520.38

Project	2025 Projected Cost	2025 Actual Costs
TOTAL COST:	\$268,735	\$473,448.74

(a) The West Centre Avenue project’s estimated cost was \$120,000.00.

4.0. ELIGIBLE PROPERTY TO BE REPAIRED, IMPROVED, AND REPLACED IN THE UPCOMING 12-MONTH PERIOD (I.E., 2026).

In the upcoming 12-month period ending December 31, 2026, as noted in Table 4 below, NAWC does not plan to undertake any main replacement projects. Under the adjusted LTIIP, the North Norwood Avenue and Grant Street main replacement projects were originally planned for 2026. Collectively, these projects proposed to replace 1,420 LF of 6 inch CIP; 440 LF of 8 inch CIP; 17 services, 5 valves, and 1 hydrant. Both of these projects are being delayed from NAWC’s current LTIIP. Neither of these projects is considered to involve high-risk mains. NAWC considers the delay of these projects as a minor adjustment to the LTIIP.

Both of these project locations may be considered in NAWC’s next LTIIP for the years 2027-2031, along with other main replacement priorities identified at that time. The reasons for the delay of these projects from the current LTIIP are as follows: (1) NAWC has replaced 8,376 LF of water mains as part of LTIIP specific projects (8,103 LF) and non-LTIIP projects (273 LF), which is 92.8% of the 9,030 LF of water main proposed to be replaced under the original LTIIP; (2) NAWC has expended \$1,847,836 on the LTIIP water main replacement projects and \$184,381 on the other DSIC-eligible main replacement projects completed in 2022 through 2025, the aggregate of which is 104% of the \$1,954,794 adjusted projected costs of the 4 LTIIP main replacement projects NAWC intended to complete between 2022 and 2025; and (3) NAWC is presently constructing a PFAS treatment plant for its 3 active wells (Nos. 4, 5 and 6) at NAWC’s Frost Lane site.

NAWC expects the total actual costs for the PFAS treatment plant to exceed the initial estimated total costs of \$2.8 million by a significant amount. Available funds to timely complete the plant are at a premium and must be reallocated from the North Norwood Avenue and Grant Street main replacement projects. Completing the PFAS treatment plant will require the focus of NAWC’s management and operations staff to enable the plant to be placed in service by July 2026.

As noted in Table 5 below, NAWC plans to replace 5 hydrants and 5 blowoffs in 2026. The projected quantity of meters to be replaced and MXUs to be installed for 2026

is estimated at 500 each. NAWC is committed to spending \$243,101 on meter replacements and MXU installations in 2026 as shown on Table 6 on the following page.

Table 4 – Projected Eligible Property for Year Ending December 31, 2026 – Mains

Year	Projected Linear Feet of Main to Be Installed
2026	0

Table 5 – Projected Eligible Property for Year Ending December 31, 2026 – Appurtenances

Year	Services	Valves	Hydrants	Fire Service	Blowoffs
2026	0	0	5	0	5

NAWC’s projected expenditures for the year ending December 31, 2026 are summarized in Table 6 below.

Table 6 – Projected Expenditures for Year Ending December 31, 2026

Project	2026 Projected Cost
Fire Hydrants (5 to Be Replaced)	\$30,388
Blowoffs (5 to Be Replaced)	\$8,682
Meter Replacements (500 +/-) and MXU Installations (500 +/-)	\$243,101
TOTAL PROJECTED COST:	\$282,171

5.0. ADJUSTMENTS TO THE LTIIIP.

Table 7 below sets forth the current LTIIIP, as adjusted for all prior years’ AAOPs and as proposed to be adjusted by this AAOP:

Table 7 – Original LTIP as Adjusted by AAOPs

Project Designation and Description	Filings (As Adjusted)	2022	2023	2024	2025	2026	Estimated Total Costs
Fire Hydrants	LTIP Approved	\$25,000	\$26,250	\$27,563	\$28,941	\$30,388	\$138,142
Meter Replacements (includes MXUs)	LTIP Approved	\$200,000	\$210,000	\$220,500	\$231,525	\$243,101	\$1,105,126
Lafayette Street Main Replacement	AAOP 2021 (Year changed; cost unchanged)	\$491,620					\$491,620
North Elm Avenue (Phase I) Main Replacement	AAOP 2021 (Year changed; cost unchanged)		\$343,791				\$343,791
North Elm Avenue (Phase II) Main Replacement	AAOP 2021 (Year changed) AAOP 2023 (Cost changed)			\$1,000,000			\$1,000,000
Summit Avenue Main Replacement	AAOPs 2021 and 2024 (Year changed; cost unchanged)			\$149,383			\$149,383
North Norwood Avenue Main Replacement	AAOPs 2021 and 2025 (Year changed; removed)					\$332,436	
Grant Street Main Replacement	AAOPs 2021 and 2025 (Year changed; removed)					\$103,008	
	DISTRIBUTION IMPROVEMENTS (DSIC ELIGIBLE) TOTAL	\$716,620	\$580,041	\$1,397,446	\$260,466	\$273,489	\$3,228,062

The substantive adjustments to the LTIP are the following: (a) resequencing the main replacement projects to advance the Lafayette Street project from 2026 to 2022 and reassigning both phases of the North Elm Avenue project to the subsequent year; (b) increasing the estimated cost of phase II of the North Elm Avenue project from \$654,552 to \$1,000,000; and (c) removing the North Norwood Avenue and Grant Street projects from year 2026 of the LTIP. NAWC submits that none of these adjustments (prior or current) constitute a “major modification” to the LTIP within the meaning of 52 Pa. Code §121.2.

Although NAWC's AAOP for 2021 indicated that the Summit Avenue main replacement project would be deferred to 2025, NAWC ultimately completed the project in 2024 – the originally proposed year of completion – in combination with the North Elm Avenue Phase II project for cost-efficiency and coordination reasons. Summit Avenue is therefore reflected in Table 7 as a 2024 LTIIP project.

As noted above and as reported on prior years' AAOPs, from 2022 through 2025, NAWC replaced 8,103 LF of water main for the projects on its LTIIP. This constitutes 89.7% of the LF of water main proposed to be replaced pursuant to the LTIIP as originally approved. NAWC also replaced 273 LF of water main on DSIC-eligible projects not specified on its LTIIP during 2022 through 2025. Together, NAWC has replaced 8,376 LF of water mains from 2022 through 2025, or 92.8% of the 9,030 LF proposed to be replaced under the LTIIP as originally approved.

From a cost perspective, the original LTIIP proposed \$3,318,058 in total spending from 2022-2026, for an average annual spend of \$663,611. The adjusted LTIIP proposes \$3,228,062 in total spending over that same period, with an average annual spend of \$645,612. These adjusted figures are 97.3% of the proposed total original LTIIP spend.³

NAWC acknowledges that the Bureau of Technical Utility Services (TUS), in its April 29, 2025, Secretarial Letter approving NAWC's 2024 AAOP, identified that NAWC's cumulative spending through 2024, combined with projected remaining expenditures, would exceed 20% of the total LTIIP budget and would therefore constitute a "major modification" under 52 Pa. Code § 121.2. However, as reflected in Table 7, NAWC's adjusted LTIIP expenditures over the full 2022-2026 term now total \$3,228,062, or 97.3% of the original \$3,318,058 budget, and NAWC has completed approximately 89.7% of the originally proposed 9,030 LF of main replacements.

In other words, while certain years exhibited higher-than-projected spending, the LTIIP as implemented remains within a reasonable band around the original cost profile and infrastructure quantities over the life of the plan. As noted by TUS in its approval of NAWC's prior AAOPs, "compliance with the LTIIP is evaluated on a multiyear basis over the life of the LTIIP." Over the complete life of the LTIIP, these adjustments do not increase the total estimated cost of the LTIIP by more than 20%. Moreover, the adjustments do not abandon NAWC's focus on high-risk main and meter replacements; nor otherwise reflect a substantial change to the LTIIP.

³ When accounting for the additional DSIC-eligible spending of \$467,059 incurred by NAWC from 2022-2025 and to be incurred in 2026 (i.e., blowoffs and customer lead service line replacements), NAWC anticipates spending \$3,695,121. This amount is 111.4% of the proposed total original LTIIP spend, an amount below the 20% threshold.

Accordingly, NAWC respectfully submits that, in light of the adjusted five-year cost profile and completed main replacement quantities, the adjustments described above do not constitute a “major modification” to the LTIIP within the meaning of 52 Pa. Code § 121.2, and that a separate petition for major modification is not required for these adjustments.

6.0. LEAD SERVICE LINE REPLACEMENT PROGRAM.

NAWC has prepared and submitted a Lead Service Line Replacement Plan (LSLR Plan) to the Commission, filed at Docket No. P-2023-3041859. The pending LSLR Plan proposes to replace 5 customer-owned lead service lines each calendar year beginning in 2024, and commit NAWC to an annual budget of \$50,000 which is thereafter indexed to reflect rising costs. As of the date of the filing of this AAOP, the Commission has not approved the LSLR Plan. NAWC intends to include its annual expected lead service line expenditures into its next LTIIP regardless of when the LSLR Plan is approved by the Commission.

Consistent with the LSLR Plan, NAWC committed to expending \$52,500 in 2025 on 5 customer lead service line replacements. In 2025, NAWC completed five (5) lead service line replacements (all customer-owned services) for a total cost of \$55,455.66.

NAWC estimates annual construction costs associated with the replacement of five 5 lead and/or galvanized service lines requiring replacement at \$55,125 in 2026. Costs may be greater than anticipated in part due to subsurface conditions encountered during construction and whether any of the replacements are in a state road.

7.0. UPDATED NON-REVENUE WATER AND MAIN BREAK OCCURRENCE RATES FOR 2025.

The Commission’s December 16, 2021, Order approving NAWC’s LTIIP included a requirement for NAWC to report on the details of its updated non-revenue water and main break occurrence rates in its AAOP starting with the AAOP filed for the year ending December 31, 2021. Appendix A provides details on NAWC’s 2025 non-revenue water calculation and breaks and leaks experience.

In summary, with its water loss monitoring and control activities, NAWC’s non-revenue water for 2025 was very low at 3.4%, which is representative of a top in class utility. With respect to breaks and leaks in 2025, NAWC reported no main breaks/leaks and repaired four (4) service line leaks. All leaks were found and repaired in a timely manner.

APPENDIX A

NAWC 2025 Break / Leak Report

NAWC 2025 Non-Revenue Water Report

NAWC 2025 Leak Report

<u>Date (Found)</u>	<u>Date (Repaired)</u>	<u>Address</u>	<u>Notes</u>
1/27/2025	2/10/2025	532 Penn Street	Customer side; Iron pipe service; Shanahan replaced service.
9/17/2025	10/7/2025	4 Dunham Lane	Customer side of curb stop; Leak at coupling.
11/14/2025	11/18/2025	3 White Swan Way	Leak on NAWCO side; Replaced service; Service was in conduit.
12/11/2025	12/18/2025	130 Cambridge Lane	Leak @ curb stop on NAWCO side; Replaced curb stop.



NON-REVENUE/UNACCOUNTED WATER ANALYSIS WORKSHEET

Project: 2025 NRW/Unaccounted Water **Report Date:** 2/6/2026

- Definitions:**
- Water to System** is the total water purchased or pumped from the treatment facility
 - Water Metered and Billed** is the amount registered from monthly reading of customers meters.
 - Water Metered and Not Billed** is the amount registered from monthly reading of meters from services not billed such as Village hall, maintenance building, park, etc.
 - Water Used for Maintenance/Firefighting** is an estimate of water used for flushing, firefighting, leaks, etc.
 - Unaccounted for Water (Lost)** is water that you cannot explain where it is.
 - Number of Services** is the number of service connections to your system.
 - Gallons Lost/Service** is a measurement to use to gauge the amount of water being wasted. Goal is 100 gallons.

User entered data Must be entered in gallons

Year:

NON-REVENUE WATER												
		AUTHORIZED		UNBILLED AUTHORIZED		LOSSES						
Gallons of Water to System		Water Metered and Billed		Yard Hydrant Sales		Water for Maint / Fire Fighting / Leaks		Unaccounted for Water (Lost)		Number of Services		Gallons Lost / Service
Jan	58,212,000	100%	56,775,000	98%	3,547.00	0%	412,000	1%	1,021,453	2%	10,400	98.2
Feb	52,057,000	100%	52,386,000	101%	31,877.00	0%	329,000	1%	-689,877	-1%	10,400	-66.3
Mar	56,911,000	100%	56,061,000	99%	87,521.00	0%	356,607	1%	405,872	1%	10,400	39.0
Apr	61,812,000	100%	50,310,000	81%	750,000.00	1%	6,562,500	11%	4,189,500	7%	10,400	402.8
May	62,023,000	100%	53,761,000	87%	978,000.00	2%	319,200	1%	6,964,800	11%	10,400	669.7
Jun	67,146,000	100%	60,349,000	90%	1,301,000.00	2%	354,800	1%	5,141,200	8%	10,400	494.3
Jul	68,949,000	100%	61,311,000	89%	283,140.00	0%	530,633	1%	6,824,227	10%	10,400	656.2
Aug	70,624,000	100%	59,733,000	85%	404,427.00	1%	418,500	1%	10,068,073	14%	10,400	968.1
Sep	64,865,000	100%	71,448,000	110%	250,641.00	0%	524,258	1%	-7,357,899	-11%	10,400	-707.5
Oct	62,878,000	100%	65,094,000	104%	346,537.00	1%	391,225	1%	-2,953,762	-5%	10,400	-284.0
Nov	54,202,000	100%	58,256,000	107%	37,333.00	0%	378,000	1%	-4,469,333	-8%	10,400	-429.7
Dec	56,236,000	100%	61,193,000	109%	38,548.00	0%	323,985	1%	-5,319,533	-9%	10,400	-511.5
	735,915,000	100%	706,677,000	96.03%	4,512,571.00	0.61%	10,900,708	1.48%	13,824,721	1.88%	10,400	110.8

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Attorney and Officer for
Newtown Artesian
Water Company

CERTIFICATE OF SERVICE

I, Thomas J. Walsh III, Esq., attorney for and officer of Newtown Artesian Water Company, hereby certify that I am this 26th day of February, 2026, serving copies of the foregoing **Annual Asset Optimization Plan for Year Ended December 31, 2025**, and this proof of service on the following persons in the manner indicated:

By Electronic Mail:

Allison Kaster, Director
Bureau of Investigation and Enforcement
Pennsylvania Public Utility Commission
Email: akaster@pa.gov

By Electronic Mail:

Darryl A. Lawrence
Consumer Advocate
Office of Consumer Advocate
Attn: Resource Account
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By Electronic Mail:

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Kenneth Shaffer, Analyst
Bureau of Technical Utility Services
Pennsylvania Public Utility Commission
Email: pdiskin@pa.gov; kennshaffe@pa.gov

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S.A. §4904 (relating to unsworn falsification to authorities).

/S/ THOMAS J. WALSH III, Esq.

By: _____
Thomas J. Walsh III, Esquire
Newtown Artesian Water Company
Email: twalsh@twalshlaw.com