



**Erin K. Fure**  
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March 18, 2026

**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 **Supplemental** response to Data Request Set I, Question A-3 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 "Erin K. 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**

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I hereby certify that I am on this day serving the above-referenced Pennsylvania-American Water Company's **Supplemental Response 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 MARCH 18, 2026**

Darryl A. Lawrence, Consumer Advocate  
Office of Consumer Advocate  
555 Walnut Street  
5<sup>th</sup> Floor, Forum Place  
Harrisburg, PA 17101-1923  
[ra-oca@paoca.org](mailto:ra-oca@paoca.org)

NazAarah Sabree, Small Business Advocate  
Office of Small Business Advocate  
555 Walnut Street  
1<sup>st</sup> Floor, Forum Place  
Harrisburg, PA 17101  
[ra-sba@pa.gov](mailto: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](mailto:akaster@pa.gov)

Dated: March 18, 2026

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 – Updated**

**Responsible Witness:            Stephen DiFriece  
Engineering Project Manager**

**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 PAWCWD. 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.

**Supplemental Response:**

Please see PA DEP letter at **A-3\_Attachment** regarding the Act 537 Planning Module.

**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**

A-3 Attachment

DEP Approval – Exemption



Pennsylvania  
**Department of  
Environmental Protection**

March 11, 2026

Newberry Township Board of Supervisors  
1915 Old Trail Road  
Etters, PA 17319

Re: Approval Letter – Exemption  
Act 537 Planning  
Southern Crossings  
DEP CODE NO. A3-67945-437-3E  
APS ID No. 1156926, AUTH ID No. 1559897  
Newberry Township, York County

Dear Supervisors:

The Department of Environmental Protection (DEP) has received the above-referenced development plan. This confirms DEP's determination that the project is exempt from the requirement to revise the official plan for new land development. This determination is based in part on municipal and other signoffs. The proposed development is located on the eastern corner of Old York Road and Beinhower Road in Newberry Township, York County.

The project consists of 99 residential equivalent dwelling units on one 48.01 acre lot with total proposed sewage flows of 22,275 gallons per day tributary to the Pennsylvania American Water Company's (PAWC) Fairview Township collection and conveyance system, and ultimately, the PAWC Fairview Township South wastewater treatment plant.

Any person aggrieved by this action may appeal the action to the Environmental Hearing Board (Board), pursuant to Section 4 of the Environmental Hearing Board Act, 35 P.S. § 7514, and the Administrative Agency Law, 2 Pa. C.S. Chapter 5A. The Board's address is:

Environmental Hearing Board  
Rachel Carson State Office Building, Second Floor  
400 Market Street  
PO Box 8457  
Harrisburg, PA 17105-8457

TDD users may contact the Environmental Hearing Board through the Pennsylvania Relay Service, 800-654-5984.

Appeals must be filed with the Board within 30 days of receipt of notice of this action unless the appropriate statute provides a different time. This paragraph does not, in and of itself, create any right of appeal beyond that permitted by applicable statutes and decisional law.

A Notice of Appeal form and the Board's rules of practice and procedure may be obtained online at <https://ehb.pa.gov> or by contacting the Secretary to the Board at 717-787-3483. The Notice of

Appeal form and the Board's rules are also available in braille and on audiotape from the Secretary to the Board.

IMPORTANT LEGAL RIGHTS ARE AT STAKE. YOU SHOULD SHOW THIS DOCUMENT TO A LAWYER AT ONCE. IF YOU CANNOT AFFORD A LAWYER, YOU MAY QUALIFY FOR FREE PRO BONO REPRESENTATION. CALL THE SECRETARY TO THE BOARD AT 717-787-3483 FOR MORE INFORMATION. YOU DO NOT NEED A LAWYER TO FILE A NOTICE OF APPEAL WITH THE BOARD.

**IF YOU WANT TO CHALLENGE THIS ACTION, YOUR APPEAL MUST BE FILED WITH AND RECEIVED BY THE BOARD WITHIN 30 DAYS OF RECEIPT OF NOTICE OF THIS ACTION.**

If you have any questions or concerns, please call Carrie A. Wilt at 717.705.4755 and refer to DEP Code No. A3-67945-437-3E, Application No. 1156926 and Authorization No. 1559897.

Sincerely,



Brian Schlauderaff  
Environmental Group Manager

- cc: Escambia Properties, LLC (pdf)  
Zane Geist, Integrated Consulting (pdf)  
Stephen DeFriece, PAWC (pdf)  
York County Planning Commission (pdf)

## VERIFICATION

I, STEPHEN A. DEFRIECE, hereby state that the facts above set forth in the attached Supplemental Response 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*

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

Dated: March 17, 2026