
Megan E. Rulli

mrulli@postschell.com
717-612-6012 Direct
717-731-1985 Direct Fax
File #: 209067

March 30, 2026

VIA ELECTRONIC FILING

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of Aqua Pennsylvania Wastewater, Inc. For Approval of its Third Long-Term Infrastructure Improvement Plan
Docket No. P-2024-3052037

Dear Secretary Homsher:

Enclosed, on behalf of Aqua Pennsylvania Wastewater, Inc. ("Aqua PA"), are the responses to the Data Requests, Set I, served by the Bureau of Technical Utility Services ("TUS") on March 18, 2026.

Respectfully submitted,



Megan E. Rulli
Associate

MER/sa
Attachment

cc: Certificate of Service
Ken Shaffer (*via email; w/attachment*)

PETITION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. P-2024-3052037

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

TUS-I-1 Reference the Petition of Aqua Pennsylvania Wastewater Inc (APW), filed on November 8, 2024, Exhibit A.

1. Reference Exhibit A

- a. The Commission finds that the Pennsylvania Supreme Court's unanimous decision issued on December 16, 2025, while reversing the Commonwealth Court's decision, was not determinative on all aspects of the case and remanded for further proceedings the matter of the OCA's contention that the Commission's factual findings were not supported by substantial evidence of record. Thus, the matter of APW's acquisition of the East Whiteland Township wastewater system has not been fully resolved by the Commonwealth Court of Pennsylvania. Pursuant to the Opinion and Order entered on February 7, 2025, at Docket No. P-2024-3052037, the Commission denied APW's request to include the wastewater assets of East Whiteland Township and to apply those assets to APW's ratemaking rate base. The Commission further determined that the Commonwealth Court's decision controls as to the ownership of the East Whiteland system and is binding on the Commission. The Commission also determined that the best course of action was to maintain the status quo of the existing East Whiteland rates. APW's current wastewater tariff explicitly excludes East Whiteland customers from the DSIC, as does APW's compliance tariff for its most recent rate case at Docket Nos. R-2024-3047822, *et al.* Therefore, the assets of the East Whiteland Township wastewater system are not jurisdictional and do not meet the definition of eligible property under 52 Pa. Code § 121.2, and East Whiteland customers are not subject to the DSIC. Therefore, APW is directed to file within 30 days an amended LTIIP that excludes the assets and expenditures related to the repair and replacement of any infrastructure of the East Whiteland Township wastewater system. Failure to do so may result in the Commission rejecting APW's LTIIP, pursuant to 52 Pa. Code § 121.4.

RESPONSE

While the Company disagrees with the conclusions stated in the data request, to limit the issues within this Petition for a Modified Third LTIP, the Company will file an updated Modified Third LTIP to remove East Whiteland.

PETITION OF AQUA PENNSYLVANIA WASTEWATER, INC.

DOCKET NO. P-2024-3052037

BUREAU OF TECHNICAL UTILITY SERVICES

SET I DATA REQUESTS

- TUS-I-2** Reference Exhibit A, Section 8: Outreach and Coordination Activities with Other Utilities, PennDOT, Homeowners Associations, and Local Governments
- a. Describe in detail any scheduled meetings between APW and any local and state agencies for the years 2025 through 2029 related to replacement and or repair of eligible property in APW's wastewater collection systems.
 - b. Describe any scheduled meetings between APW and local stakeholders and non-governmental organizations for the years 2025 through 2029 related to replacement and or repair of eligible property in APW's wastewater collection systems.

RESPONSE

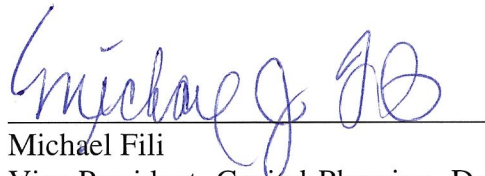
As stated in the LTIP the Company does coordinate with local governments when it is able. In wastewater operation and maintenance, a significant amount of work occurs through trenchless repair, and as such, the Company does not have to coordinate road openings and paving schedules as frequently in our service territories since often access is through an existing manhole. For any project that requires road opening the Company coordinates with the municipality through the permitting process. As an example, APW and its parent company Aqua Pennsylvania, Inc. coordinated a sewer and water main replacement in Media Borough, Delaware County, PA such that the sewer and water mains were completed in the same road opening. The Company coordinated with Media Borough on its paving schedule for these replacements. The Company also provides letter to customers if the work will affect the availability of service. Often, when road opening is required for sewer work, it is due to emergency maintenance or repair where coordination is not feasible.

For complex projects APW meets with municipalities and/or homeowners associations in the year that a construction project is taking place to discuss the upcoming large project. At those meetings future plans are also discussed. Since projects can shift due to schedules and changes in prioritization, those meetings

are scheduled as a project moves forward. In addition, on complex larger projects, the Company has submitted plans through Coordinate PA as part of the PA One Call system.

VERIFICATION

I, Michael Fili, Vice President, Capital Planning, Design, & Construction of Aqua Pennsylvania Wastewater, Inc., hereby state that the facts set forth in Aqua Pennsylvania Wastewater, Inc.'s responses to the Bureau of Technical Utility Services TUS Data Request 1 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 herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

A handwritten signature in blue ink, appearing to read "Michael Fili", is written over a horizontal line.

Michael Fili
Vice President, Capital Planning, Design, &
Construction
Aqua Pennsylvania Wastewater, Inc.

Dated: March 30, 2026