



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 NORTH STREET, HARRISBURG, PA 17120  
April 15, 2026

IN REPLY PLEASE  
REFER TO OUR FILE

Docket No. P-2024-3050472  
Utility Code 210011

DANIEL IYA  
ELVERSON WATER COMPANY INC  
PO BOX 20  
ELVERSON PA 19520  
[INBOX@ELVERSONWATER.COM](mailto:INBOX@ELVERSONWATER.COM)

RE: Petition of Elverson Water Company, Inc. for Approval of its Lead Service Line Replacement Program at Docket No. P-2024-3050472

Dear Daniel Iya:

On November 19, 2024, Elverson Water Company, Inc. (Elverson Water) filed the above-captioned document (Petition) with the Pennsylvania Public Utility Commission (Commission). For the Commission to complete its analysis of the filing, please respond with the information requested in the attached document.

Please forward the information to the Secretary of the Commission at the address listed below **within ten (10) business days** from the date of this letter. All documents requiring notary stamps must have original signatures. The Commission strongly encourages submission through efilings with the Secretary of the Commission by opening an efilings account through the Commission website and accepting eservice at <https://efiling.puc.pa.gov>. The Commission is accepting all public documents through our efilings system at this time.

If your filing contains confidential material, you are required to either file by overnight delivery or submit to the Secretary's Share Point File system to ensure the timely filing of your submission. Filers should contact the Secretary's Bureau in advance to gain access to the Share Point File system. Make sure to reference the Docket Number listed above when filing your response. The overnight address for hard-copy or confidential responses is:

Matthew L. Homsher, Secretary  
Pennsylvania Public Utility Commission  
400 North Street  
Harrisburg, PA 17120

Please note your answers must be verified per 52 Pa. Code § 1.36. Accordingly, you must provide the following statement with your responses:

*I, [print name of appropriate company representative], 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 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).*

Signature \_\_\_\_\_

Title \_\_\_\_\_

Date \_\_\_\_\_

Please contact the below staff person if any problems should arise that prevent a full response within ten business days or if any clarification of these data requests is needed. Please mark the materials “CONFIDENTIAL” in bold or highlighted manner if any of the requested information is deemed to be of a confidential nature.

In addition, to expedite completion of the review, please send a copy of the response to Matthew T. Lamb, P.E. in the Water/Wastewater Section of the Bureau of Technical Utility Services via e-mail at [mlamb@pa.gov](mailto:mlamb@pa.gov). Please also direct any questions to Matthew Lamb at telephone number (717) 783-1001. Thank you in advance for your cooperation.

Sincerely,



Matthew L. Homsher  
Secretary

Enclosure: TUS Data Request Set 2

cc: Darryl Lawrence, Office of Consumer Advocate (w/enclosure), [ra-oca@paoca.org](mailto:ra-oca@paoca.org)  
NazAarah Sabree, Office of Small Business Advocate (w/enclosure), [ra-sba@pa.gov](mailto:ra-sba@pa.gov)  
Rebecca Lyttle, Office of Small Business Advocate (w/enclosure), [relyttle@pa.gov](mailto:relyttle@pa.gov)  
Allison Kaster, Bureau of Investigation & Enforcement (w/enclosure), [akaster@pa.gov](mailto:akaster@pa.gov)

## TUS Data Request Set 2

### Petition of Elverson Water Company, Inc. for Approval of its Lead Service Line Replacement Program at Docket No. P-2024-3050472

Note: Please restate the data request prior to providing a response. In addition, provide the name and title of the person(s) providing the response and/or information for each data request.

P-5. As part of its response to TUS Data Request Set 1, Elverson Water provided a revised Appendix C that included a copy of its revised Lead Service Line Replacement Plan (LSLR Plan). In the LSLR Plan's Section (b)(5), Elverson Water indicated that "If the customer is not the property owner, the Company will require the customer to locate the property owner and have them sign the LSLR Agreement Form." Further, in the LSLR Plan's Section (b)(6)(iii), Elverson Water indicated that "If the customer is not the property owner, the customer will be responsible for contacting the property owner and relaying all information and communications given by the Company." The Commission notes here that while Elverson Water may coordinate with the customer to locate the property owner prior to commencement of an LSLR, Elverson may not delegate its responsibility to provide LSLR Plan information and communications directly to the property owner. Please provide a revised LSLR Plan that does not require the customer, if the customer is not the property owner, to locate and communicate with the property owner as part of Elverson's processes and procedures to obtain acceptance of an LSLR.