



April 21, 2026

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

RE: Annual Optimization Plan (AAOP) for City of Lancaster
Docket No. M-2026-3060821
Water Utility No. 221800
Wastewater Utility No. 230220

Dear Mr. Homsher:

In response to your letter directed to the City Solicitor dated April 8, 2026, and the accompanying data request, the City's responses are attached. Please note that we were unable to confirm answers to items No. 2 and 3 by the response deadline because the matters are still under review by City officials, and there are meetings scheduled to review these matters which fall outside the 10 day response deadline. As such, we respectfully request a 30 day extension to supplement the City's responses. I have sent a separate email request to Mr. Shaffer for the same in accordance with your letter, and am filing the attached responses today in good faith.

We appreciate your kind consideration of this request.

Very truly yours,

A handwritten signature in black ink, appearing to read "Angela M. Boyle".

Angela M. Boyle, Paralegal to
Barry N. Handwerger, Solicitor

Encls.

cc: Kennshaffe@pa.gov



TUS Data Request Set 1

The City of Lancaster Annual Asset Optimization Plan at Docket No. M-2026-3060821

Referencing Lancaster's 2025 AAOP:

- a. Provide a report that details Lancaster's updated non-revenue water and main break occurrence rates as required in the Commission Order approving Lancaster's LTIP.

City Response: Please see the attached non-revenue water audit.
Main Break Occurrence: The City had 95 recorded main breaks in 2025.

- b. In Lancaster's AAOP filing, Table 1 listed the 2026 estimated annual expenditures at \$18,891,739.50 while Lancaster's LTIP proposes \$2,877,690 in spending. Please confirm the proposed 2026 spending.


City Response: The matter is still under review by the City, and it is undetermined at the time of this filing. The City will supplement this response within 30 days of the date of this letter with a definite response.

- c. Please state if Lancaster intends to file a Third LTIP when the current LTIP expires in 2027.

City Response: The matter is still under review by the City, and it is undetermined at the time of this filing. The City will supplement this response within 30 days of the date of this letter with a definite response.

VERIFICATION

I, Stephen Campbell, Director of Public Works for the City of Lancaster, hereby state the facts set forth 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 the statements herein are made subject to the penalties of the 18 Pa. C.S. §4904 (relating to unsworn falsification to authorities).


Stephen Campbell
Director of Public Works

April 21, 2026
Date Signed



AWWA Free Water Audit Software: Worksheet

FWAS v6.0

American Water Works Association

Water Audit Report for: **City of Lancaster**
 Audit Year: **2025** **Jan 01 2025 - Dec 31 2025** **Calendar**

Click 'n' to add notes
 Click 'g' to determine data validity grade
 To edit water system info: [go to start page](#)

To access definitions, click the **input name**

All volumes to be entered as: MILLION GALLONS (US) PER YEAR

[Water Supplied Error Adjustments](#)

choose entry option:

WATER SUPPLIED	Volume from Own Sources:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="7"/>	<input type="text" value="7,584.199"/>	MG/Yr
VOS	Water Imported:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="n/a"/>	<input type="text" value="0.000"/>	MG/Yr
WI	Water Exported:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="n/a"/>	<input type="text" value="0.000"/>	MG/Yr
WE				

VOSEA
WIEA
WEEA

WATER SUPPLIED: MG/Yr

AUTHORIZED CONSUMPTION

BMAC	Billed Metered:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="9"/>	<input type="text" value="5,298.696"/>	MG/Yr
BUAC	Billed Unmetered:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="n/a"/>	<input type="text" value="0.000"/>	MG/Yr
UMAC	Unbilled Metered:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="n/a"/>	<input type="text" value="0.000"/>	MG/Yr
UAC	Unbilled Unmetered:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="3"/>	<input type="text" value="13.247"/>	MG/Yr

choose entry option:

Default option selected for Unbilled Unmetered, with automatic data grading of 3

AUTHORIZED CONSUMPTION: MG/Yr

WATER LOSSES

MG/Yr

Apparent Losses

Default option selected for Systematic Data Handling Errors, with automatic data grading of 3

SDHE	Systematic Data Handling Errors:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="3"/>	<input type="text" value="13.247"/>	MG/Yr
CMI	Customer Metering Inaccuracies:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="3"/>	<input type="text" value="0.000"/>	MG/Yr
UC	Unauthorized Consumption:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="3"/>	<input type="text" value="13.247"/>	MG/Yr

choose entry option:

[under-registration](#)

Default option selected for Unauthorized Consumption, with automatic data grading of 3

Apparent Losses: MG/Yr

Real Losses

Real Losses: MG/Yr

WATER LOSSES: MG/Yr

NON-REVENUE WATER

NON-REVENUE WATER: MG/Yr

SYSTEM DATA

Lm	Length of mains:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="6"/>	<input type="text" value="631.0"/>	miles	(including fire hydrant lead lengths)
Nc	Number of service connections:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="5"/>	<input type="text" value="48,370"/>		(active and inactive)
	Service connection density:		<input type="text" value="77"/>	conn./mile main	
Lp	Are customer meters typically located at the curbstops/property line?	<input type="text" value="No"/>			
	Average length of (private) customer service line:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="6"/>	<input type="text" value="25.0"/>	ft	(average distance between property line and meter)
AOP	Average Operating Pressure:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="7"/>	<input type="text" value="65.0"/>	psi	

COST DATA

CRUC	Customer Retail Unit Charge:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="9"/>	<input type="text" value="\$5.70"/>	\$/1000 gallons (US)	Total Annual Operating Cost
VPC	Variable Production Cost:	<input type="text" value="n"/> <input type="text" value="g"/> <input type="text" value="8"/>	<input type="text" value="\$309.17"/>	\$/Million gallons	

WATER AUDIT DATA VALIDITY TIER:

***** The Water Audit Data Validity Score is in Tier III (51-70). See Dashboard tab for additional outputs. *****

[go to dashboard](#)

A weighted scale for the components of supply, consumption and water loss is included in the calculation of the Water Audit Data Validity Score

PRIORITY AREAS FOR ATTENTION TO IMPROVE DATA VALIDITY:

Based on the information provided, audit reliability can be most improved by addressing the following components:

- 1: Volume from Own Sources (VOS)
- 2: Customer Metering Inaccuracies (CMI)
- 3: Number of Service Connections (Nc)

KEY PERFORMANCE INDICATOR TARGETS:

OPTIONAL: If targets exist for the operational performance indicators, they can be input below:

Unit Total Losses:	<input type="text"/>	gal/conn/day
Unit Apparent Losses:	<input type="text"/>	gal/conn/day
Unit Real Losses ^a :	<input type="text"/>	gal/conn/day
Unit Real Losses ^b :	<input type="text"/>	gal/mile/day

If entered above by user, targets will display on KPI gauges (see Dashboard)

2025

White = incomplete
Orange = complete

Use acronyms for navigation

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Limiting criteria (see Start Page for details)

go to input

Volume from Own Sources (VOS) - Data Grading Criteria

go to notes

vos	Criteria Question	Select Best-Fit Answers to All Visible Questions	
vos.0	Did the water utility supply any water from its own sources during the audit year?	Yes	
vos.1	What percent of own supply volume is metered?	>99%	
<p>For questions 2-10 below: Choose the answer that applies for those meters that measure >90% of the finished water volume.</p> <p>In-situ flow accuracy testing = a test process that confirms the flow measuring accuracy of the primary device (the flowmeter), in its installed location, using an independent reference volume.</p> <p>Electronic calibration = a process that checks for error in the metering secondary device(s) and/or the tertiary device(s).</p> <p>Secondary device can include conversion to mA, meter transmitter or similar instrumentation.</p> <p>Tertiary device can include SCADA, historian or other computerized archival system.</p>			
vos.2	What is the frequency of electronic calibration?	Annually	Limiting
vos.3	What level of data transfer errors are checked as part of the electronic calibration process?	Data transfer errors are checked at secondary device(s) AND tertiary device(s)	
vos.4	Is the most recent electronic calibration documentation available for review?	Yes	
vos.5	What is the frequency of in-situ flow accuracy testing?	None, or Not within last 5 years	Limiting
vos.6			
vos.7			
vos.8	Have testing and calibration procedures been closely scrutinized for compliance with procedures described in the AWWA M36 and/or M33 Manual(s)?	Yes	
vos.9	Which best describes the frequency of finished water meter readings?	Daily	
vos.10	Which best describes the frequency of data review for anomalies/errors? These can include numbers that are outside of typical patterns, and zero or 'null' values that may reflect a gap in data recording.	More frequently than monthly, but not every day	
FINAL DATA GRADE FOR THIS AUDIT INPUT:		7	

[go to input](#) **Volume from Own Sources Error Adjustment (VOSEA) - Data Grading Criteria** [go to notes](#)

vosea	Criteria Question	Select Best-Fit Answers to All Visible Questions
vosea.1	Are tank levels monitored automatically & recorded daily?	Yes
vosea.2	Are daily changes of stored water volumes in distribution system tanks included in the tabulation of the daily "Volume from Own Sources" quantity?	No
vosea.3	Is the annual net distribution storage change included in either the VOS input or the VOSEA input?	No
vosea.4	Are the flow accuracy test and/or electronic calibration results included in the VOSEA input in the water audit?	No error adjustment made due to absence of testing or calibration results
FINAL DATA GRADE FOR THIS AUDIT INPUT:		8

Limiting

[go to input](#)

Water Imported (WI) - Data Grading Criteria

[go to notes](#)

wi	Criteria Question	Select Best-Fit Answers to All Visible Questions
wi.0	Did the water utility import any water during the audit year?	No
wi.1		
<p>For questions 2-10 below: Choose the answer that applies for those meters that measure >90% of the water imported volume.</p> <p>In-situ flow accuracy testing = a test process that confirms the flow measuring accuracy of the primary device (the flowmeter), in its installed location, using an independent reference volume.</p> <p>Electronic calibration = a process that checks for error in the metering secondary device(s) and/or the tertiary device(s).</p> <p>Secondary device can include conversion to mA, meter transmitter or similar instrumentation.</p> <p>Tertiary device can include SCADA, historian or other computerized archival system.</p>		
wi.2		
wi.3		
wi.4		
wi.5		
wi.6		
wi.7		
wi.8		
wi.9		
wi.10		
FINAL DATA GRADE FOR THIS AUDIT INPUT:		n/a

[go to input](#) **Water Imported Error Adjustment (WIEA) - Data Grading Criteria** [go to notes](#)

wiea	Criteria Question	Select Best-Fit Answers to All Visible Questions
wiea.1		
wiea.2		
wiea.3		
wiea.4		
FINAL DATA GRADE FOR THIS AUDIT INPUT:		n/a

[go to input](#)

Water Exported (WE) - Data Grading Criteria

[go to notes](#)

we	Criteria Question	Select Best-Fit Answers to All Visible Questions
we.0	Did the water utility export any water during the audit year?	No
we.1		
<p>For questions 2-10 below: Choose the answer that applies for those meters that measure >90% of the water exported volume.</p> <p>In-situ flow accuracy testing = a test process that confirms the flow measuring accuracy of the primary device (the flowmeter), in its installed location, using an independent reference volume.</p> <p>Electronic calibration = a process that checks for error in the metering secondary device(s) and/or the tertiary device(s).</p> <p>Secondary device can include conversion to mA, meter transmitter or similar instrumentation.</p> <p>Tertiary device can include SCADA, historian or other computerized archival system.</p>		
we.2		
we.3		
we.4		
we.5		
we.6		
we.7		
we.8		
we.9		
we.10		
FINAL DATA GRADE FOR THIS AUDIT INPUT:		n/a

[go to input](#)

Water Exported Error Adjustment (WEEA) - Data Grading Criteria

[go to notes](#)

weea	Criteria Question	Select Best-Fit Answers to All Visible Questions
weea.1		
weea.2		
weea.3		
weea.4		
FINAL DATA GRADE FOR THIS AUDIT INPUT:		n/a

[go to input](#)

Billed Metered Authorized Consumption (BMAC) - Data Grading Criteria

[go to notes](#)

bmac	Criteria Question	Select Best-Fit Answers to All Visible Questions
bmac.0	Were any customers metered in the audit year?	Yes
bmac.1	For billed metered accounts, what % of bills are estimated in a typical billing cycle?	5% or less
bmac.2	How often does the utility read its customer meters? For systems with multiple read frequencies, select the reading frequency that describes the majority of your customers.	Monthly
bmac.3	Is the BMAC volume pro-rated to represent consumption occurring exactly during the audit period?	Yes
bmac.4	How frequently does internal review by utility staff of the BMAC volumes occur?	Every billing cycle
bmac.5	What level of detail is examined in the internal review of BMAC volumes?	Totals grouped by use type or customer class and specific accounts flagged for anomalous consumption
bmac.6	When was the most recent billing data review by someone who is independent of the utility billing process?	Within last 3 years
bmac.7	What level of detail was examined in the review by someone who is independent of the utility billing process?	Full billing database query and analysis of raw data to verify the summary consumption volumes
FINAL DATA GRADE FOR THIS AUDIT INPUT:		9

Limiting

[go to input](#)

Billed Unmetered Authorized Consumption (BUAC) - Data Grading Criteria

[go to notes](#)

buac	Criteria Question	Select Best-Fit Answers to All Visible Questions
buac.0	Was there any billed consumption on unmetered accounts in the audit year?	No
buac.1		
buac.2		
buac.3		
FINAL DATA GRADE FOR THIS AUDIT INPUT:		n/a

[go to input](#)

Unbilled Metered Authorized Consumption (UMAC) - Data Grading Criteria

[go to notes](#)

umac	Criteria Question	Select Best-Fit Answers to All Visible Questions
umac.0	Did the water utility have any unbilled-metered consumption in the audit year?	No
umac.1		
umac.2		
umac.3		
umac.4		
FINAL DATA GRADE FOR THIS AUDIT INPUT:		n/a

[go to input](#)

Unbilled Unmetered Authorized Consumption (UUAC) - Data Grading Criteria

[go to notes](#)

This Data Grading Criteria is hidden when the 'default' input is used on the Worksheet

FINAL DATA GRADE FOR THIS AUDIT INPUT:

3

[go to input](#)

Systematic Data Handling Error (SDHE) - Data Grading Criteria

[go to notes](#)

This Data Grading Criteria is hidden when the 'default' input is used on the Worksheet

FINAL DATA GRADE FOR THIS AUDIT INPUT:

3

[go to input](#)

Customer Metering Inaccuracies (CMI) - Data Grading Criteria

[go to notes](#)

cmi	Criteria Question	Select Best-Fit Answers to All Visible Questions
cmi.0	Was there any metered customer usage during the audit period?	Yes
cmi.1	Do you test meters reactively (when triggered by customer complaint or billing/consumption flag)?	Reactive testing conducted
cmi.2	For small size customer meters, which best describes the frequency of proactive testing (effort beyond when triggered by customer complaint or billing/consumption flags)?	No proactive small meter testing activity to date
cmi.3		
cmi.4	For mid and large size customer meters, which best describes the frequency of the proactive testing program?	Recurring, within 5 years prior to audit period, but less frequently than annually
cmi.5	Which best describes what meters are included in the proactive mid- and large customer meter testing activities?	Proactive - all large meters are on a testing schedule
cmi.6	Which best describes how the input was derived?	Meter accuracy test results or manufacturer specs are referenced but not analyzed and used directly in calculation
cmi.7	Has the input derivation been reviewed by someone with expert knowledge in the M36 methodology?	Yes
cmi.8	To what extent does meter replacement occur and for which meters?	Annual proactive replacement of subset of meters (i.e. by age or throughput)
cmi.9	Which best describes the reliability of meter installation records?	Records are kept for meter installations, and they include data on installation date, type, size, and manufacturer
FINAL DATA GRADE FOR THIS AUDIT INPUT:		3

Limiting

[go to input](#)

Unauthorized Consumption (UC) - Data Grading Criteria

[go to notes](#)

This Data Grading Criteria is hidden when the 'default' input is used on the Worksheet

FINAL DATA GRADE FOR THIS AUDIT INPUT:

3

[go to input](#)

Length of Mains (Lm) - Data Grading Criteria

[go to notes](#)

Lm	Criteria Question	Select Best-Fit Answers to All Visible Questions
Lm.1	How was the input derived?	Derived directly from Mains inventory (GIS, ledger, etc)
Lm.2	Are hydrant laterals included in the input derivation?	Yes
Lm.3	Which best describes how the Mains inventory (GIS, ledger, etc) is kept up to date?	Additions or subtractions are updated in the mains inventory (GIS, ledger, etc), but less than annually
Lm.4	Which best describes how the Mains inventory (GIS, ledger, etc) is field validated to confirm field conditions match the inventory?	Field validation is accomplished (i.e. in daily operations or specific validation projects)
FINAL DATA GRADE FOR THIS AUDIT INPUT:		6

Limiting

[go to input](#)

Number of Service Connections (Nc) - Data Grading Criteria

[go to notes](#)

Nc	Criteria Question	Select Best-Fit Answers to All Visible Questions
Nc.1	How was the input derived?	Extracted from Services inventory (GIS, billing system, etc)
Nc.2	What is the count of services based on?	Premise based, i.e. service connection count, location ID count
Nc.3	Are inactive (but still pressurized) service lines included in the input? These may be metered or unmetered.	No
Nc.4	Which best describes how the inventory of service connections (GIS, billing system, etc) is kept up to date?	Additions or subtractions are updated in the service line inventory (GIS, billing system, etc), at least annually
Nc.5	Which best describes how the inventory of service connections (GIS, billing system, etc) is field validated to confirm field conditions match the inventory?	Field validation is accomplished for a portion of the system (i.e. in daily operations or specific validation projects)
FINAL DATA GRADE FOR THIS AUDIT INPUT:		5

Limiting

[go to input](#)

Average Length of (Private) Customer Service Line (Lp) - Data Grading Criteria

[go to notes](#)

Lp	Criteria Question	Select Best-Fit Answers to All Visible Questions	
Lp.0	Are customer meters typically located at the curbside or property line?	No	
Lp.1	How was the input derived?	Input extrapolated from study sampling a portion of the system	
Lp.2	Which best describes how the Customer Service Line and Meter Locations mapping is kept up to date?	Additions or subtractions are updated in the service line and meter locations inventory, but less than annually	Limiting
Lp.3	Which best describes how the Customer Service Line mapping is validated to what is in the field?	No field validation is conducted	
Lp.4	Which best describes the policy to define where the utility's ownership of the service line ends, and the customer's ownership of the service line begins?	Policy is clear, and adherence in practice is consistent	
FINAL DATA GRADE FOR THIS AUDIT INPUT:		6	

[go to input](#)

Average Operating Pressure (AOP) - Data Grading Criteria

[go to notes](#)

aop	Criteria Question	Select Best-Fit Answers to All Visible Questions
aop.1	Which best describes checks on the boundary integrity for the system's pressure zone(s)?	Normally-closed boundary valves between zones have been confirmed within the past 3 years to be fully closed
aop.2	Which best describes how one-time pressure readings (i.e. from hydrants) are collected?	Collected annually during routine system flushing and/or hydrant testing
aop.3	Which best describes where continuous pressure data (via temporary data loggers or permanent telemetry) is collected?	At zone boundary conditions, plus locations inside the zone(s) representing the full pressure profile
aop.4	Which best describes how continuous pressure data is collected?	Temporary data logger(s) deployed, but limited and not capturing seasonal variation during the year
aop.5	How was the input derived?	Derived from hydraulic model, where model has been field calibrated in the last 5 years
FINAL DATA GRADE FOR THIS AUDIT INPUT:		7

Limiting

[go to input](#)

Customer Retail Unit Charge (CRUC) - Data Grading Criteria

[go to notes](#)

cruc	Criteria Question	Select Best-Fit Answers to All Visible Questions
cruc.0	Was any metered consumption billed on a volumetric basis in the audit period?	Yes
cruc.1	Which best describes the use and reliability of the current rate structure?	Customer bill calculations have been checked to confirm the rate structure is correctly implemented
cruc.2	Choose the option that best describes how the input was derived	A volume-weighted average of all rates was calculated
cruc.3	Is there any additional volumetric revenue the utility receives that depends on water meter readings, such as sewer?	Yes, and this has been incorporated into the volume-weighted average calculation
cruc.4	Has the input derivation been reviewed by someone with expert knowledge in the M36 methodology?	No
FINAL DATA GRADE FOR THIS AUDIT INPUT:		9

Limiting

go to input
go to notes
Variable Production Cost (VPC) - Data Grading Criteria

	Criteria Question	Select Best-Fit Answers to All Visible Questions	
vpc.1	Choose the option that best describes how the input was derived	Multiple sources of water exist, and a volume-weighted average was calculated for all sources	
vpc.2	Choose the option that best describes which short-run marginal costs have been included in the input, using the definitions below for reference. Short-run marginal costs can include the following: - chemicals + power for treatment, typically applicable if the utility is producing/treating water - power for distribution, typically applicable if pumps exist in the distribution network - water acquisition costs, typically applicable if the utility is purchasing water or incurs any extraction costs for withdrawing from a source Some short-run marginal costs may not be applicable. The auditor should analyze the system characteristics to determine which costs are applicable for inclusion in the VPC input derivation. See also the latest AWWA M36 Manual for further guidance.	All applicable short-run marginal costs are included	
vpc.3	Choose the option that best describes which long-run marginal costs have been included in the input, using the definitions below for reference. Long-run marginal costs can include the following: - water treatment residuals management, typically applicable if solids are produced from water treatment process - accelerated wear & tear on dynamic equipment, typically applicable if pumps exist for treatment and/or distribution, or any other equipment exists that wears out as a function of use instead of time (i.e. filter media, chemical dosing pumps, uv disinfection bulbs, etc) - payouts for damage claims from main and service line breaks, typically applicable if damage claims are paid by the utility - accelerated expansion of supply capacity, typically applicable if the utility is at or nearing supply capacity, or scarcity costs in water scarce areas - full cost pricing that includes all lifecycle costs and externalities (internalized or not) Some long-run marginal costs may not be applicable. The auditor should analyze the system characteristics to determine which costs are applicable for inclusion in the VPC input derivation. See also the latest AWWA M36 Manual for further guidance.	Long-run marginal costs have not been evaluated for applicability, and are not included	Limiting
vpc.4	Has the input derivation been reviewed by someone with expert knowledge in the M36 methodology?	No	
FINAL DATA GRADE FOR THIS AUDIT INPUT:		8	

AWWA Free Water Audit Software
Water Balance



Water Audit Report for: **City of Lancaster**

Audit Year: **2025**

Jan 01 2025 - Dec 31 2025

Data Validity Tier: **Tier III (51-70)**

FWAS v6.0

American Water Works Association.
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		Water Exported (WE) (corrected for known errors) <i>0.000</i>	Billed Water Exported				Revenue Water (Exported) <i>0.000</i>
			Authorized Consumption <i>5,311.943</i>	Billed Authorized Consumption <i>5,298.696</i>	Billed Metered Consumption (BMAC) (water exported is removed) <i>5,298.696</i>	Billed Unmetered Consumption (BUAC) <i>0.000</i>	Revenue Water <i>5,298.696</i>
Volume from Own Sources (VOS) (corrected for known errors) <i>7,584.199</i>	System Input Volume <i>7,584.199</i>	Water Supplied <i>7,584.199</i>	Unbilled Authorized Consumption <i>13.247</i>	Unbilled Metered Consumption (UMAC) <i>0.000</i>	Unbilled Unmetered Consumption (UUAC) <i>13.247</i>	Non-Revenue Water (NRW) <i>2,285.503</i>	
			Apparent Losses <i>26.493</i>	Systematic Data Handling Errors (SDHE) <i>13.247</i>	Customer Metering Inaccuracies (CMI) <i>0.000</i>		Unauthorized Consumption (UC) <i>13.247</i>
Water Imported (WI) (corrected for known errors) <i>0.000</i>			Water Losses <i>2,272.256</i>	Real Losses <i>2,245.763</i>	Leakage on Transmission and/or Distribution Mains <i>Not broken down</i>		
					Leakage and Overflows at Utility's Storage Tanks <i>Not broken down</i>		
					Leakage on Service Connections <i>Not broken down</i>		