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May 18, 2026

PUBLIC VERSION

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 – Wastewater
Division for Approval to Offer, Render, Furnish or Supply Wastewater
Service to The Public in an Additional Portion of East Fallowfield
Township, Chester County, Pennsylvania - Docket No. A-2026-3061164**

Dear Secretary Homsher:

In your response to your Secretarial Letter of April 24, 2026, please find Pennsylvania-American Water Company's Responses to Set I Data Requests. Please note that one attachment is **CONFIDENTIAL** and has been uploaded to the SharePoint System.

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*)
Billy Lam, Bureau of Technical Utility Services (*via electronic mail*)
Sean Donnelly, Bureau of Technical Utility Services (*via electronic mail*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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 East Fallowfield Township, Chester County Pennsylvania (Doe Run Elementary)	: : : : : : : : : :
	Docket No. A-2026-3061164 :

CERTIFICATE OF SERVICE

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

Darryl A. Lawrence, Consumer Advocate
Office of Consumer Advocate
555 Walnut Street
5th Floor, Forum Place
Harrisburg, PA 17101-1923
ra-oca@paoca.org
(via electronic mail)

NazAarah Sabree, Small Business Advocate
Office of Small Business Advocate
555 Walnut Street
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Alison Kaster, Director
Pennsylvania Public Utility Commission
Bureau of Investigation and Enforcement
400 North Street
PO Box 3265
Harrisburg, PA 17105
akaster@pa.gov
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Respectfully submitted,



Dated: May 18, 2026

Erin K. Fure, Esquire (PA ID #312245)
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 to Offer, Render, Furnish or Supply Wastewater Service to The Public in an Additional Portion of East Fallowfield Township, Chester County, Pennsylvania

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PAWC RESPONSES TO SET I DATA REQUESTS

**Responsible Witness: Kelly Jacunski, EIT
Engineering Project Manager – Pennsylvania-American Water Company**

Date: May 18, 2026

- A-1. The Application’s Exhibit L included a copy of the Department of Environmental Protection (DEP) approved Sewage Facilities Planning Module (Planning Module) for the new Doe Run Elementary School (New Elementary School). The Planning Module included a copy of a map (Planning Module Sewer Map) entitled "Sewer Franchise Area Expansion Plan" prepared by T and M Associates dated September 26, 2025. The extent of the requested territory depicted in the Application’s Confidential Exhibit A-1 (Requested Territory) does not match the planned sewerage area depicted in the Planning Module Sewer Map. Please explain why the area extents of the Requested Territory in the Application’s Confidential Exhibit A-1 exceeds the planned sewerage area depicted in the Planning Module Sewer Map.

RESPONSE:

Please see updated Applied for Territory Map and Metes and Bounds at **Attachment A-1.**

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**Responsible Witness: James P. Kelly - Manager, Operations
Pennsylvania-American Water Company**

Date: May 18, 2026

- A-2. In the Application’s Section 9, Pennsylvania-American Water Company- Wastewater Division (PAWC-WD) indicated that the proposed main extension (Main Extension) and proposed pump station (Pump Station) will serve the New Elementary School as well as six additional parcels (Outside Parcels) located along the route of the Main Extension. However, the Requested Territory Map in the Application’s Confidential Exhibit A-1 appears to include over 17 additional parcels. Please provide responses to the following:
- a. Describe how all the Outside Parcels currently receive wastewater service; and
 - b. Provide a copy of all written wastewater service requests received by PAWC-WD from property owners in the Requested Territory.

RESPONSE:

- a. Outside parcels currently receive wastewater service by on-lot systems.
- b. As of the date of this Response, PAWC-WD has not received any written requests for wastewater service from property owners within the Requested Territory.

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Engineering Project Manager – Pennsylvania-American Water Company**

Date: May 18, 2026

- A-3** The Application’s Exhibit L included a copy of a letter from DEP to East Fallowfield Township dated June 17, 2025, that approved the Planning Module (DEP Planning Module Approval Letter) for the New Elementary School project based on the construction and operation of the Pump Station with an average design flow of 5,580 gallons per day (GPD). In the Application’s Section 17, PAWC-WD averred that the Coatesville Area School District (CASD) requested PAWC-WD provide wastewater service to the New Elementary School defined as 26 equivalent dwelling units (EDUs) with an estimated average flow demand of 5,775 GPD. In the Planning Module’s Component 3, the project narrative is limited to the sewerage requirements for the New Elementary School based on 26 EDUs at 225 GPD/EDU, or 5,850 GPD, and does not contemplate the inclusion of additional wastewater flows from the Outside Parcels. The requested wastewater flow demand from CASD for the New Elementary School matches the planned wastewater flow demand in the Planning Module, and, therefore, CASD has fully reserved the planned wastewater flow capacity. In support of this limitation, DEP conditioned its approval and noted in the DEP Planning Module Approval Letter “Please be advised that additional sewage facilities planning is required prior to any additional connections to the proposed pumping station.” The Commission observed that DEP’s approval of the Planning Module on June 17, 2025, follows DEP’s approval of the Act 537 Sewage Facilities Plan Update on January 23, 2025, (Act 537 Plan Update) as noted in East Fallowfield Township’s letter addressed to the Commission dated November 12, 2025, contained in the Application’s Exhibit N. Please provide responses to the following:
- a. Provide evidence of DEP approval of the additional sewage facilities planning required to extend wastewater service to the Outside Parcels included in the Requested Territory along with copies of any approval letters from DEP and associated conditions; or

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- b. Provide a revised map for the Requested Territory that removes the Outside Parcels and includes a boundary description with bearing angles and distances and a quantification of the revised Requested Territory area in acres.

RESPONSE:

- a.-b. Please see response and attachment to A-1.

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**Responsible Witness: Kelly Jacunski, EIT
Engineering Project Manager – Pennsylvania-American Water Company**

Date: May 18, 2026

A-4. Please provide a copy of the Act 537 Plan Update along with its DEP approval letter including any associated conditions and enclosures.

RESPONSE:

Please see East Fallowfield Township Act 537 Plan Update and DEP approval letter dated January 23, 2025 attached as **Attachment A-4**.

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**Responsible Witness: James P. Kelly - Manager, Operations
Pennsylvania-American Water Company**

Date: May 18, 2026

A-5 In the Application’s Section 11, PAWC-WD indicated that wastewater service will be provided by the Main Extension from a point of connection with an existing PAWC-WD manhole located in the Branford Village subdivision to a point of connection with the New Elementary School lateral. However, the Application does not appear to include a copy of a map or plan that depicts the location or route of the Main Extension. Pursuant to 52 Pa. Code § 3.514(a)(2)(ii), an application must include a map or plan of suitable scale and detail highlighting the boundaries of the geographical area encompassing the proposed collection main extension including the location or route of the extended wastewater system. Please provide a map or plan of suitable scale depicting the location and route of the Main Extension that identifies pipe diameters and slopes, proposed manholes with top and invert elevations, the Pump Station, and other associated appurtenances.

RESPONSE:

Please see Construction Plans attached for the following:

Attachment A-5.1 - Construction Plans for Doe Run Pump Station

Attachment A-5.2 - Construction Plans for Doe Run Water and Wastewater

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PAWC RESPONSES TO SET I DATA REQUESTS

**Responsible Witness: Kelly Jacunski, EIT
Engineering Project Manager – Pennsylvania-American Water Company**

Date: May 18, 2026

- A-6.** In the Application’s Section 11, PAWC-WD indicated that the Main Extension includes 1,760 linear feet (LF) of eight-inch diameter wastewater gravity main and 1,700 LF of four-inch diameter wastewater force main. Conversely, in the Application’s Section 13, PAWC-WD detailed in a table therein that the Main Extension includes 1,760 LF of eight-inch diameter wastewater gravity main and 955 LF of two-inch diameter wastewater force main. Please provide responses to the following:
- a. Explain the apparent discrepancy between the diameter and length of the wastewater force main described in the Application’s Sections 11 and 13; and
 - b. Provide a revised breakdown of estimated pipe sizes, lengths, and material types for wastewater mains and service laterals, and descriptions and quantities for all related facilities (i.e., Pump Station, manholes, etc.).

Response:

- a. The gravity sewer line will utilize both 8” and 10” PVC piping. The forcemain will be 4”. Please see Doe Run Pump Station plans at **Attachment A-5.1**
- b. Please see revised itemized cost breakdown for the gravity sewer link and forcemain at **Attachment A-6.1**. Please see pump station cost estimate at **Attachment A-6.2**.

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**Responsible Witness: Kelly Jacunski, EIT
Engineering Project Manager – Pennsylvania-American Water Company**

Date: May 18, 2026

- A-7.** In the Application’s Section 15, PAWC-WD indicated that the estimated construction cost for the Main Extension is approximately \$383,375. However, this cost estimate appears to only include costs of the 1,760 LF of eight-inch wastewater gravity main and 955 LF of two-inch wastewater force main as identified in the Application’s Section 13 and does not include, among other things, manholes and the Pump Station. Please provide a revised detailed breakdown of the construction cost for the proposed facilities that include all the facilities needed to provide service to the Requested Territory.

RESPONSES:

Please see responses and attachments to **A-6**.

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Responsible Witness: Gerald DeBalko, Senior Manager

Engineering Project Delivery

Pennsylvania-American Water Company

Date: May 18, 2026

- A-8.** In the Application’s Exhibit G, PAWC-WD provided a copy of an engineering report (Engineering Report) prepared by an identified employee of PAWC-WD. Pursuant to 52 Pa. Code § 3.514(a)(3)(i), the application shall include an engineering report that contains a full description of the proposed collection main extension for the wastewater system and the manner, including the pipe sizes, quantities and material used for construction for all collection facilities and the approximate time schedule for installation of the various component facilities of the main extension. However, the Engineering Report does not appear to provide a full description of the Main Extension, including all associated appurtenances (e.g., manholes, etc.), the Pump Station including the number, type and capacity of the pump(s), and the projected schedule for installation of the various component facilities of the Main Extension. Additionally, the Commission notes that an engineering report must be prepared and stamped by a professional engineer licensed by the Commonwealth of Pennsylvania, and it does not appear the individual that prepared the report is a licensed engineer. Please provide an Engineering Report that includes a full description of the Main Extension including all associated appurtenances (e.g., pipes, laterals, manholes, etc.), the Pump Station including the number, type and capacity of the pumps, and the projected schedule for installation of the various component facilities of the Main Extension along with the signature and seal of the licensed engineer who was responsible for the preparation of the document.

RESPONSE: Please see Engineering Report at **Attachment A-8**. Furthermore, see a complete detailed description of the associated appurtenances and pump stations at **Attachments A-6.1 and 6.2**.

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**Responsible Witness: Kelly Jacunski, EIT
Engineering Project Manager – Pennsylvania-American Water Company**

Date: May 18, 2026

- A-9.** The DEP Planning Module Approval Letter was conditioned upon requiring PAWC-WD to secure a Water Quality Management Permit (WQM Permit) for construction and operation of the Pump Station. Please indicate whether CASD and/or PAWC-WD has applied for a WQM Permit for the Main Extension and Pump Station and, if so, provide a copy of the WQM Permit application and clarify when PAWC-WD projects it will receive WQM Permit approval from DEP.

RESPONSE:

The WQM Permit was issued on February 2, 2026. Please see attached permit at **Attachment A-9**.

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**Responsible Witness: Kelly Jacunski, EIT
Engineering Project Manager – Pennsylvania-American Water Company**

Date: May 18, 2026

A-10. The Application’s Confidential Exhibit A-1 included a copy of a confidential map depicting the Requested Territory. Please provide a public version of the map for the Requested Territory.

RESPONSE:

Please find a public version of the map attached as **Attachment A-10**.

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**Responsible Witness: Kelly Jacunski, EIT
Engineering Project Manager – Pennsylvania-American Water Company**

Date: May 18, 2026

- A-11.** In the Application’s Section 23, PAWC-WD indicated that it will provide wastewater service to the Requested Territory under the rules and regulations of its Commission-approved tariff. However, the Application does not appear to include the applicable rate zone and rates, by customer class, for the Requested Territory. Please clarify the applicable rate zone and rates, by customer class, for the Requested Territory.

RESPONSE:

The school will be under Rate Zone 1 and will be classified as a Commercial account.

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**Responsible Witness: Kelly Jacunski, EIT
Engineering Project Manager – Pennsylvania-American Water Company**

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A-12. Please quantify the total number of proposed customers, by customer class, in the Requested Territory.

RESPONSE:

Currently, there will be one customer hooked up which will be the Coatesville Area School District.

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**Responsible Witness: Aldaine R. Alphonse
Senior Regulatory Analyst – Pennsylvania-American Water Company**

Date: May 18, 2026

- A-13.** Please provide a detailed breakdown of PAWC-WD’s projected annual revenues, by customer class, and the estimated annual expenses that will be realized as part of this Application.

RESPONSE:

Please see estimated annual revenues and expenses at **Attachment A-13**.

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**Responsible Witness: Kelly Jacunski, EIT
Engineering Project Manager – Pennsylvania-American Water Company**

Date: May 18, 2026

- A-14.** Please identify all permits, easements, and rights-of-way required for construction of the proposed wastewater facilities along with their associated approval status and costs.

RESPONSE:

The gravity sewer and forcemain are to be installed within the state and Township rights of way. The pump station will be constructed on Township property within an easement for American Water to own and operate the pump station. The Township will grant the pump station easement to PAWC as depicted on the pump station plans at **Attachment 5.1**. No private lands are required for the installation of the sewage conveyance or pump station. It is anticipated that the Township will execute an easement agreement for the pump station in June 2026. A state highway occupancy permit has been approved by PennDOT for the state ROW installation of the gravity line and forcemain can be seen at **Attachment A-14.1**. The Township will issue a building permit for the pump station. East Fallowfield Township has required the pump station and sewer lines to be built to be consistent with the Township Act 537 Plan as a condition of the school's land development approval. Please see attached letter from the Township's Sewage Engineer at **Attachment A-14.2**.

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**Responsible Witness: James P. Kelly - Manager, Operations
Pennsylvania-American Water Company**

Date: May 18, 2026

A-15. Pursuant to 52 Pa. Code § 3.514(d)(3), an application must identify other certificated wastewater public utilities or municipally owned public wastewater systems that are directly adjacent to, abut, or are situated within one mile of the proposed extension of the applicant's distribution main. However, the Application does not appear to include this information. Please identify other certificated wastewater public utilities or municipally owned public wastewater systems that are directly adjacent to, abut, or are situated within one mile of the Main Extension.

RESPONSE: There are no providers within a mile of the Main Extension. The closest provider of wastewater service is South Coatesville Borough Public Works which is a 1.5 miles away.

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PAWC RESPONSES TO SET I DATA REQUESTS

**Responsible Witness: Jana Hurst, Senior Paralegal
Pennsylvania-American Water Company**

Date: May 18, 2026

- A-16.** In the Application’s Section 12, PAWC-WD indicated that Pennsylvania-American Water Company (PAWC) intends to file a separate application (Water Application) for the right to provide water service to the Requested Territory. Please clarify when PAWC plans to file the Water Application as the Application indicates the New Elementary School’s “Construction is expected to be completed by August 2026 to coincide with the start of the new school year.”

RESPONSE:

The Water Application will be filed by the end of the month.

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Date: May 18, 2026

- A-17.** The Application’s Exhibit M included a copy of a Resolution from the Board of Supervisors of East Fallowfield Township dated October 22, 2024, that conditionally approved CASD’s Preliminary Land Development Application for the New Elementary School including the accompanying plans (Land Development Plans) dated March 1, 2024, last revised October 4, 2024. Please provide an electronic vector graphic copy of the most recent version of the conditionally approved Land Development Plans.

RESPONSE:

Please find an electronic vector graphic copy attached as **Attachment A-17**.