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August 2, 2022

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street, Filing Room  
Harrisburg, PA 17120

Re: Policy Statement on Public and Private Fire Protection; Docket No. M-2022-3033054; **Letter Request for Clarification of Applicability of Proposed Policy Statement**

Dear Secretary Chiavetta:

On June 16, 2022, the Public Utility Commission (Commission) adopted the Motion of Commissioner Ralph V. Yanora (Motion) in this proceeding regarding a proposed policy statement concerning fire protection. On June 29, 2022, the Commission issued a Secretarial Letter seeking comments on a proposed policy statement including directed questions.

The policy statement would apply to “Class A Water Utilities” or “Class A Water public utility companies” or “Class A Water Companies.” Neither the Motion nor the Secretarial Letter define or reference a definition of any of these terms. Accordingly, via this letter we are seeking clarification of the Commission’s intended definition of “Class A.” We note that there are various regulatory definitions for this term, including but not limited to:

- “A public utility having annual operating revenue of \$750,000 or more (average of the last 3 consecutive years)...”. 52 Pa. Code § 65.16.
- “A water utility with annual revenues greater than \$1 million.” 52 Pa. Code § 56.2.
- “Water systems serving an average of more than 5 million gallons per day.” 25 Pa. Code § 302.901.

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Clarification of the intended water utilities to which the policy statement will apply is necessary to assist water utilities in determining whether to file comments on this matter, which are due on August 29, 2022. We appreciate the Commission's timely attention to this matter.

Very truly yours,

*/s/ Whitney E. Snyder*

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WES/das

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