



Via Electronic Filing

February 27, 2023

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street – 2nd Floor
Harrisburg, PA 17120

Re: Policy Statement on Public and Private Fire Protection
Docket No. M-2022-3033054
Aqua Pennsylvania – Letter in Lieu of Comments

Dear Secretary Chiavetta:

On June 16, 2022, the Pennsylvania Public Utility Commission (“PUC”) adopted the motion of Commissioner Ralph V. Yanora (“Motion”) at the referenced docket and directed the Bureau of Technical Utility Services (“TUS”) and the Law Bureau to develop questions for Class A Water Companies on a proposed policy statement for public and private fire protection. On August 30, 2022, Aqua Pennsylvania (“Aqua” or the “Company”) filed Comments in response to the directed questions. On November 10, 2022, the PUC entered a Proposed Policy Statement Order, requesting comments upon publication in the *Pennsylvania Bulletin*. The Order was published in the *Pennsylvania Bulletin* on January 14, 2023. 53 *Pa. B.* 379.

In its August 30 Comments to the directed questions, Aqua stated that hydraulic modeling requirements for each system would require approximately five years and additional resources to adequately develop and routinely maintain, particularly for smaller systems where the costs may outweigh the benefit of such a model. Similarly, extensive infrastructure upgrades for facilities to provide fire protection services may not be economically feasible in certain areas of its service territory. Ultimately, the Company asserts that the provision of fire protection should not be the sole responsibility of the water utility.

Aqua notes that the National Association of Water Companies – Pennsylvania Chapter (“NAWC”) filed Comments in response to the Proposed Policy Statement Order. Aqua fully supports the Comments filed by NAWC. Aqua appreciates the opportunity to comment on this proposed policy statement.

Please accept this letter in lieu of comments for filing in the referenced matter. Please contact me at if you have any questions or concerns.

Respectfully submitted,



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