

# JACKSONKELLY PLLC

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## Public Service Commission of West Virginia Filing Cover Sheet (G.O. 262.8)

Filing Date: January 12, 2026

Case Number(s): Case No. 25-0927-W-PC

Case Name(s): West Virginia-American Water Company and the  
Fayette County Commission

Filing Party/Parties: West Virginia-American Water Company

Title of Document: Partial Response to Staff's First Data Request (1.001,  
1.002, 1.004, 1.006, 1.007)

Attachments: Partial Response to Staff's First Data Request

Confidential Materials: Staff 1.001\_Confidential (filed under seal)

Filer Contact: Christopher L. Callas  
[callas@jacksonkelly.com](mailto:callas@jacksonkelly.com)

Copied Persons: Service List

Certificate of Service: The signature on the enclosed pleading certifies service  
on the date above by electronic mail to the parties on the  
Executive Secretary's service list(s) for the referenced  
dockets (if any) and any additional persons listed above.

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January 12, 2026

## ***Via Hand Delivery***

Karen Buckley  
Executive Secretary  
Public Service Commission  
of West Virginia  
201 Brooks Street  
Charleston, West Virginia 25323

Re: Case No. 25-0927-W-PC  
West Virginia-American Water Company and the  
Fayette County Commission

Dear Ms. Buckley:

Enclosed are the Company's responses to items 1.001, 1.002, 1.004, 1.006, and 1.007 of the Staff's First Data Request.

The attachment to item 1.001 (Staff 1.001\_Confidential) is a confidential document. We have enclosed two copies of the response and the confidential attachment in a sealed envelope. Please maintain this document in accordance with your standard procedures for the retention of confidential information.

Please contact me if you have any questions or concerns. As always, we appreciate your assistance in this matter.

Sincerely yours,



Christopher L. Callas

CLC/mv  
Attachments  
c: Service List (by email)

CASE NO. 25-0927-W-PC  
WEST VIRGINIA-AMERICAN WATER COMPANY  
and FAYETTE COUNTY COMMISSION

STAFF'S FIRST REQUEST FOR INFORMATION AND PRODUCTION OF DOCUMENTS TO  
WEST VIRGINIA-AMERICAN WATER COMPANY

WITNESS: Michael P. Raymo

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**STAFF 1.001:**

Please provide a copy of the Fayetteville WW System Comprehensive Planning Study referenced in the prefiled Direct Testimony of Michael P. Raymo at p. 8, Bates p. 167 filed in Case No. 25-0595-WS-DSIC on June 30, 2025.

**RESPONSE:**

Please see **Staff 1.001 Confidential.**

CASE NO. 25-0927-W-PC  
WEST VIRGINIA-AMERICAN WATER COMPANY  
and FAYETTE COUNTY COMMISSION

STAFF'S FIRST REQUEST FOR INFORMATION AND PRODUCTION OF DOCUMENTS TO  
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WITNESS: Michael P. Raymo

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**STAFF 1.002:**

Please provide the specific detailed plans, including timeline and costs to build a sewer line to repair and replace the damaged sewer line which serves the Mount Olive Correctional Complex. If line has already been built, please provided the details on when and the costs of the line.

**RESPONSE:**

Only a preliminary assessment, cost estimate, and schedule for this proposed work have been completed by the Company. No design drawings have been prepared by the Company, nor has any construction effort been initiated. The cost estimate to restore wastewater service to Mount Olive Correctional Complex and a number of wastewater customers who lost service because of the damaged sewer line is approximately \$17.4M. The project is expected to take approximately four years to plan, design, permit, and construct.

The Company has also committed to pursue, evaluate, and otherwise determine any proposed temporary solutions related to any and all odors, discharges, and other issues related to Cannelton Hollow, but at this time it has not identified a feasible temporary solution and that evaluation will likely take place closer to or after closing of the transaction.

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WITNESS: Michael P. Raymo

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**STAFF 1.004:**

Please provide details on what plans WVAWC has to address the Cannelton Hollow issues referenced in the Application at page 15 and §3.C. of the Asset Purchase Agreement, including costs, timelines etc. if not provided above.

**RESPONSE:**

Please see WVAWC's response to Staff 1.002.

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STAFF'S FIRST REQUEST FOR INFORMATION AND PRODUCTION OF DOCUMENTS TO  
WEST VIRGINIA-AMERICAN WATER COMPANY

WITNESS: Brooks Crislip

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**STAFF 1.006:**

It is Staff's understanding that the Kanawha Falls Public Service District has received funding and approval for a project for its water system from the West Virginia Jobs and Infrastructure Council. How will this affect the transaction? How will this affect the purchase price?

**RESPONSE:**

Kanawha Falls Public Service District has had a number of projects before the WVIJDC.

With regard to WVIJDC project number 2023W-2321, this project has not reached the binding commitment stage, and it is unclear whether or when it will be completed. The Company does not believe that the pendency of this funding request will affect the Transaction or the Purchase Price.

Regarding funding for WVIJDC Project 2022W-2115 Water System Improvements Phase 1, the Company likewise believes that the pendency of this funding request will not affect the Transaction or the Purchase Price. Kanawha Falls PSD applied for a cost and funding change on September 10, 2025, increasing the budget for this project to \$12,500,000. This funding is comprised of a DWTRF Loan of \$10,000,000, a DWTRF PF Loan of \$1,500,000, and an IJDC grant of \$1,000,000. During the IJDC Technical Funding and Review Committee meeting on October 28, 2025, the PSC representative to IJDC, Brandon Crace, presented a formal objection to approval of this cost and funding change as Kanawha Falls PSD was not in compliance with PSC Order issued July 2, 2025, regarding case number 22-0631-PWD-DU. Despite his objection, the Technical Funding and Review Committee approved the motion and sent the PSD's cost and funding change request to the full IJDC for approval. The rationale was that the PSD did not have

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WITNESS: Brooks Crislip

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not binding commitment, but only a funding recommendation, and that it would need to comply with all PSC Orders before binding commitment was given. On November 5, 2025, at the IJDC monthly meeting, then-WDA Executive Director, Marie Prezioso, reiterated this was only an approval to pursue the funding, but not a binding commitment. Following a council vote, the cost and funding change was approved. Again, PSC representative Brandon Crace voted against the motion. It was stated again at this meeting that Kanawha Falls PSD would need to fully comply with the PSC before they could receive a binding commitment.

Kanawha Falls PSD has not complied with PSC Order in case number 22-0631-PWD-DU, in part as that order requires the PSD to enter into an Operations and Maintenance Agreement with the Company. To date, no such executed agreement exists and therefore, Kanawha Falls PSD does not have funding committed to this project. Any outstanding costs related to IJDC Project 2022W-2115, or other water and sewer infrastructure projects Kanawha Falls PSD may propose, are not a consideration in the transaction. The decision of the PSD and its contractors to proceed with work on a water or sewer project in view of the PSD's status at the PSC (including the pendency of this case) is a financial risk to those contractors.

All other reported debts related to Kanawha Falls PSD projects, 2016W-1650, 2022W-2105, 2022W-2074, and 2017S-1683 have been considered in the purchase price.