

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Act 155 of 2014 Tentative Implementation : Docket No. M-2014-2448824
Order

Comments of
Aqua Pennsylvania, Inc.

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**COMMENTS OF AQUA PENNSYLVANIA, INC.
TO THE
JANUARY 15, 2015 TENTATIVE IMPLEMENTATION ORDER**

I. INTRODUCTION

Aqua Pennsylvania, Inc. (“Aqua”) appreciates the opportunity to comment on the Pennsylvania Public Utility Commission’s (“PUC” or “Commission”) Tentative Implementation Order entered January 15, 2015, regarding the implementation of Act 155 of 2014. Aqua serves approximately 1.4 million customers in Pennsylvania through 31 counties. Aqua’s wastewater subsidiary, Aqua Pennsylvania Wastewater, Inc., serves approximately 20,000 connections in Pennsylvania. Aqua’s water and wastewater systems serve both rural and urban areas.

Act 155 was signed into law on October 22, 2014, which reauthorized and amended Chapter 14 of the Public Utility Code (66 Pa. Cons. Stat. §§ 1401-1419), Responsible Utility Customer Protection. The Act is mean to protect responsible ratepayers, while providing utilities with collection mechanisms, but ensuring that utility service is available to all customers.

Aqua commends the General Assembly and the Commission for taking steps to ensure that utility customers in Pennsylvania will continue to receive reliable service and utilities will have defined standards to follow. It is with this background that Aqua provides the following suggestions and clarifying comments for the Commission’s consideration.

II. COMMENTS

A. **Medical Certificates Require A Signature By A Licensed Physician, Nurse Practitioner, Or Physician's Assistant.**

Aqua understands and agrees with the General Assembly's expansion of who is authorized to sign a medical certificate for a customer, but wants to ensure that medical certificates are accompanied by a signature of a medical professional. The term "medical certificate" is now defined in Section 1403 as:

A written document, in a form approved by the commission: (1) certifying that a customer or member of the customer's household is seriously ill or has been diagnosed with a medical condition which requires the continuation of service to treat the medical condition; and (2) signed by a licensed physician, nurse practitioner or physician's assistant.

66 Pa. Cons. Stat. § 1403. Aqua agrees that due to the high demand on medical professionals' time, a licensed physician, nurse practitioner or physician's assistant are appropriate personnel to approve a medical certificate. Aqua wants to ensure that it is emphasized that any and all medical certificates, provided to a utility by one of the authorized medical professionals, are signed. Emphasizing such a point will ensure that customers and medical professionals are aware that a medical certificate will not be determined valid until they are signed. Requiring a signature will reduce any possible delay involved in contacting the medical professional's office concerning an unsigned medical certificate form, and it will increase accountability in granting and renewing medical certificates.

B. **The Utility's Reporting Requirements Of Customers With Arrearages Over \$10,000 Should Be An Annual Snapshot.**

Aqua agrees with the PUC that the reporting requirement for utilities concerning customers with accounts exceeding \$10,000 in arrearages should be an annual "snapshot" and believes that this is consistent with the General Assembly's legislative intent. Under this

approach, the utility should be required to include in its annual reporting requirement only those customers who currently have arrearages over \$10,000 as of a specified date. Hence, a customer that may have had over \$10,000 in arrearages earlier in the reporting year, but who has reduced their arrearages to under \$10,000 by the annual “snapshot” date would not be included in the utility’s report. This approach will incentivize the utility to concentrate on accounts that have continuing outstanding high arrearage issues.

C. Implementing A System To Collect Data For the Utility’s Annual Reporting Requirement For Customers With Over \$10,000 In Arrearages And For Medical Certificates Will Take Time.

Aqua agrees with the General Assembly and the PUC that utilities should report to the Commission customers that have arrearages in excess of \$10,000 and the number of medical certificates and medical certificate renewals. This information will be useful to the Commission and utilities to track customer issues and ultimately better serve the public. Aqua emphasizes that implementing a system to collect, track, and report this information will take time to develop and put in place. Aqua asks that the Commission take into consideration the complexities in reworking the utilities’ reporting systems to capture this data, and provide enough time for utilities to adequately have the personnel and processes in place to comply with this new reporting requirement.

III. CONCLUSION

Aqua appreciates the opportunity to comment on the Tentative Implementation Order and asks that the Commission consider its comments. Aqua looks forward to continuing to work with the Commission on these issues. Please direct any questions with regard to these comments to the undersigned.

Respectfully submitted,



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