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October 30, 2020

VIA eFILING

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

**Re: Pennsylvania Public Utility Commission v.
Pennsylvania-American Water Company
Docket Nos. R-2020-3019369 and R-2020-3019371**

Dear Secretary Chiavetta:

Enclosed for filing is a **Stipulation** in the above-referenced matters. As evidence by the enclosed Certificate of Service, copies of the Stipulation have been served on Administrative Law Judge Conrad A. Johnson and all parties of record.

The Parties agreed to the Stipulation with the understanding that the Company will be implementing the actions described in the Company's Amended Response to interrogatory OCA-05-051, which is included with the Stipulation.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Kenneth M. Kulak

KMK/tp
Enclosures

c: Per Certificate of Service (w/encls.)

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PENNSYLVANIA PUBLIC UTILITY	:	Docket No. R-2020-3019369
COMMISSION	:	Docket No. R-2020-3019371
	:	
v.	:	
	:	
PENNSYLVANIA-AMERICAN WATER	:	
COMPANY	:	

CERTIFICATE OF SERVICE

I hereby certify and affirm that I have this day served copies of a **Stipulation** in the above-referenced proceedings on the following persons, in the manner specified below, in accordance with the requirements of 52 Pa. Code § 1.54:

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Dated: October 30, 2020

*Counsel for
Pennsylvania-American Water Company*

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**PENNSYLVANIA PUBLIC UTILITY
COMMISSION**

v.

**PENNSYLVANIA-AMERICAN WATER
COMPANY**

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:
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**DOCKET NOS. R-2020-3019369
R-2020-3019371**

STIPULATION

Pennsylvania-American Water Company (“PAWC” or the “Company”) and the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”) (together, the “Stipulating Parties”), by their respective counsel, hereby enter into this Stipulation to address issues raised by CAUSE-PA in the above-referenced water and wastewater base rate proceeding. The Stipulating Parties request that Administrative Law Judge Conrad A. Johnson (the “ALJ”) and the Pennsylvania Public Utility Commission (the “Commission”) approve and adopt this Stipulation.

I. TERMS OF THE STIPULATION

A. Language Access

1. PAWC will continue its review of customer communication materials and modify as necessary for compliance with Commission regulations at 52 Pa. Code § 56.201(b).
2. PAWC will provide written documents to customers in Spanish, if requested.
3. If a PAWC customer calls the Customer Service Center and requests correspondence in Spanish, the Customer Service Representative (“CSR”) will code the system to automatically generate all customer correspondence going forward for that customer in Spanish.

4. PAWC will translate billing information into Spanish in compliance with 52 Pa. Code § 56.201(b). PAWC will present the revised billing information to the low income advisory group in advance of implementation and consider feedback from the advisory group in making its revisions.

5. PAWC will modify its termination notices to include information in Spanish directing Spanish-speaking customers to a number to call for information and translation assistance. The Spanish language section of all termination notices will highlight that the document is a termination notice.

6. PAWC will revise its policies and procedures so that its CSRs will contact a third party interpreter service upon encountering a customer with Limited English Proficiency.

7. PAWC will develop a language access plan within 180 days of the final order in the above-referenced proceeding (the “Final Order”), in consultation with the low income advisory group.

8. PAWC will conduct a formal needs assessment to determine whether any of its water or wastewater rate zones are populated by 5% or more of individuals who speak a language other than English or Spanish. If so, PAWC will comply with Commission regulations 52 Pa. Code § 56.91(b)(17) with respect to that group.

B. Protection from Abuse Accounts

9. PAWC will develop written policies and procedures related to domestic violence issues, which will include guidelines for reviewing other court orders that qualify for Chapter 56 protections. PAWC will consult with Pennsylvania Coalition Against Domestic Violence (“PCADV”) in developing these policies and procedures.

10. PAWC will consult with members of its newly formed low income advisory group on PAWC's policies and procedures concerning victims of domestic violence.

11. PAWC will implement specific domestic abuse training for its Compliance and Customer Advocacy teams. Such trainings will be developed in consultation with PCADV.

12. PAWC will implement training for CSRs to increase their knowledge about the availability of additional protections for victims of domestic violence and to actively screen for and identify customers who may be exempt from Chapter 14 of the Public Utility Code. Such training documents will be developed in consultation with PCADV.

13. PAWC will develop scripts for CSRs to use when screening for potential domestic violence victims and for explaining the protections available to customers with a Protection from Abuse Order (a "PFA") and similar court orders.

14. PAWC will develop scripts and written guidance for its Compliance and Customer Advocacy teams to use when communicating with victims of domestic violence.

15. PAWC will conduct a review of its confidentiality procedure for information of customers with PFAs and similar court orders, and if necessary, enhance the process for protecting account information, including protections against access by a third party who is currently listed or was previously listed on the customer account.

16. PAWC will ensure training documents highlight the need for extra confidentiality protections for customers with PFAs and similar court orders.

17. PAWC will establish a dedicated group of individuals from the Compliance and Customer Advocacy teams, who will be responsible for consulting and communicating with customers with PFAs and similar court orders.

18. PAWC will establish a dedicated email address and fax for the submission of PFAs and similar court orders, which will only be accessible to a limited number of PAWC employees.

19. PAWC will develop a fact sheet and other outreach materials that prominently highlight protections available to customers with PFA orders or other court orders with clear evidence of domestic violence. PAWC will share a draft of these materials with its low income advisory group for input and feedback.

20. On or about November 2, 2020, PAWC will review and revise its training documents regarding attempting to make personal contact at termination to include additional scenarios and written instructions for: (1) an allegation of a pending dispute or complaint; and (2) an allegation of a PFA or a court order that shows evidence of domestic violence.

II. CONCLUSION

THEREFORE, the Stipulating Parties, by their respective counsel, hereby evidence their agreement to the terms of the Stipulation set forth above and request respectfully request that the Commission adopt the Stipulation in the Final Order in this case.

Respectfully submitted,



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*Counsel for Pennsylvania-American
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Dated: October 29, 2020

Pennsylvania-American Water Company
Docket Nos. R-2020-3019369 (Water)
R-2020-3019371 (Wastewater)
OCA Set 5

OCA-05-051

Responsible Witness: Ashley E. Everette, Director of Rates and Regulatory for PAWC

Question:

Please provide a detailed description of how translations of written documents provided to customers are provided for:

- a. Credit and collection activities (including but not limited to shutoff notices).
- b. Bill assistance program outreach.
- c. Deferred payment plans.

Included within these explanations, provide a detailed explanation of the languages provided, how the choice of languages is made, and how the written documents in different languages are distributed.

6/16/2020 Response:

The Company provides written documents to customers in Spanish, if requested. If a PAWC customer calls the Customer Service Center and requests correspondence in Spanish, the Customer Service Representative codes the system to automatically generate all customer correspondence going forward for that customer in Spanish. The choice of languages is based on the historical requests the Company has received for translation services. 98.6% of the translation requests the Company has received are to translate English documents into Spanish. The Company has translation services available for communication with customers who speak other languages.

10/22/2020 Amended Response:

The Company does not provide all written communications to customers in Spanish. When a non-English speaking customer contacts the company, the customer service representative first asks if there is someone in the home that speaks English. If the answer is no, the company representative connects with Language Services to bring a translator on the line to assist with the facilitation of the conversation between the company and the customer.

Termination notices include the statement in Spanish shown below, which indicates that the communication is important and to contact the Company for translation assistance. In addition, as part of a pending comprehensive review of all American Water communications, this Spanish statement is

being programmed to be added to all communications that could result in the commencement of the termination process.

Esto es un aviso importante sobre su servicio de alcantarilla. Para la ayuda de la traduccion, por favor llamas a Pennsylvania American Water al numero 1-800-565-7292.

A list of the communications already containing this Spanish statement as well as those where it is in the process of being added is below.

Letter Name
10 day non access sewer only
10 day notice to Tenant
10 day service discontinuance - tenant responsible
10 day service discontinuance - unknown ratepayer
10 Day Shut off Notice Non Repair - PA
3 day non access sewer only
3 Day Post Notice_PA (NonRes)
3 Day Post Notice_PA (Res)
3 Day Post Shut Off Notice Non Access-PA
3 Day Shut off Notice Non Repair - PA
30 day notice to Tenant
30 day service discontinuance - tenant responsible
30 day service discontinuance - unknown ratepayer
37 day notice to landlord
37 day notice to landlord-Waste water
48 hour non access sewer only
48 Hour Notice – NonRes
48 Hour Notice – Res
48 Hour Post Notice Non Access - PA
48 Hour Shut off Notice Non Repair - PA
All Service Disconnection_PA- NonRes

All Service Disconnection_PA- Res
Backflow RDC Installation_BFA Survey Sequence 3 - FINAL (All States exc CA)
Backflow RDC Repair_BFA_Survey_Sequence_3 - FINAL (All States exc CA)
Backflow Termination Install - FINAL (All States)
Backflow Termination Repair - FINAL (All States)
Backflow Termination Test - FINAL (All States)
Backflow Termination Upgrade - FINAL (All States)
Collective Disconnect Notice - Master Ac - All States exc IL
Consecutive Estimation Letter 2 FINAL (IA,IL,IN,KY,MD,NJ,NY,PA,TN,VA,WV)
Consecutive Estimation Letter 3 FINAL (IA,IL,IN,KY,MD,NJ,NY,PA,TN,VA,WV)
Consecutive Zero Letter 3 - FINAL (IA,IN,KY,MD,MO,NJ,NY,PA,VA)
Consumer Service Line Leak Final Letter - FINAL - Affiliates (IA, NJ, PA, VA Only)
Consumer Service Line Leak Final Letter - FINAL (IA, NJ, PA, VA Only)
Customer must maintain Non-device Final - FINAL (All States)
Customer must maintain Non-device First - FINAL (All States)
Customer Violation
Inaccessible-Blocked Meter final letter - FINAL (All States exc CA)
Inactive with Consumption FINAL (All States)
Install Letter 3_BFA Installation Sequence equal 3 - FINAL (All States exc CA)
Meter Pit Full of Dirt Debris
Need Access to Change Inside Meter final - FINAL (All States exc CA)
Need Access to Inside Meter final letter (MO,NJ,IA,WV,IL,IN,KY,TN,MD,PA,VA,NY)
Need Access to Inside Meter first letter - FINAL (All States exc CA)
PA - Denial Service Need Lease (PA Only) – FINAL
PA - Theft Of Service – Supervisor
PA Backbill Due to 4 or more Estimates
PA McKeeSport 3 day Post Notice
PA McKeeSport 48 Hour Notice

PA McKeesport MD 10 Day Notice
PA McKeesport MD 30 Day Notice
PA McKeesport Sewer only 10 day notice
PA McKeesport Sewer only 10 day notice – MO
PA McKeesport Sewer only 37 day notice
PA-10 Day Shut Off- Non Access
PA-3 Day Shut Off- Non Access
PA-48 Hour Shut Off- Non Access
PA-Co Term 10 Day
PA-Co Term 3 Day
PA-Co Term 48 Hours
PST 3 Day Notice Sewer Only
PST 48 Hr Notice Sewer Only
Repair Letter_BFA Installation Sequence equal 3 - FINAL (All States exc CA)
Repair Remote Device When Meter Inside - FINAL (IA,IN,PA)
Replace Meter Letter 1 - FINAL (All States exc. CA)
Replace Meter Letter 2 - FINAL (All States exc. CA)
Replace Meter Letter 3 - FINAL (All States exc. CA)
Replace Meter Letter 4 - FINAL (All States exc. CA)
Return Check 1 - FINAL (All States exc CA)
Sewer Only Dunning Notice
Shut Off Notice Non Access - PA - FINAL (PA Only)
Tampered with Meter-Device - FINAL (All States)
Test Letter 3_BFA_Installation_Sequence_3 - FINAL (All States exc CA)
Upgrade Letter 3_BFA Installation Sequence 3 - FINAL (All States exc CA)