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January 3, 2022

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

Re: Petition of The Pittsburgh Water and Sewer Authority for Approval of Pilot Private Service Line Leak Repair and Expanded Conservation Program for Eligible Low Income Customers and Authorization to Track Costs as a Regulatory Asset for Future Base Rate Recovery
Docket No. P-2022-

Dear Secretary Chiavetta:

Enclosed for electronic filing please find the Pittsburgh Water and Sewer Authority's Petition for Low Income Line Leak Repair and Conservation Program and Authorization to Track Costs as a Regulatory Asset for Future Base Rate Recovery with regard to the above-referenced matter. The filing of this Petition is in compliance with Section III.F.7.c of the Commission approved Joint Petition for Settlement at Docket No. R-2020-3017951.¹

Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell, Esq.

DMO/lww

Enclosure

cc: Cert. of Service w/enc.

¹ *Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority – Water*, Docket No. R-2020-3017951, Order entered December 3, 2020, adopting as own action the Recommended Decision dated October 29, 2020 which recommended approval of the Joint Petition for Settlement dated September 30, 2020 (see Appendix to the Recommended Decision for Terms and Conditions of Joint Petition for Settlement). Pursuant to Secretarial Letter dated December 8, 2021, the Commission granted the unopposed request of PWSA to extend the due date for the filing of this petition to January 3, 2022.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PWSA's Petition for Low Income Line Leak Repair and Conservation Program and Authorization to Track Costs as a Regulatory Asset for Future Base Rate Recovery upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

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Dated: January 3, 2021

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Petition of The Pittsburgh Water and Sewer :
Authority For Approval of Pilot Private Service :
Line Leak Repair and Expanded Conservation :
Program for Eligible Low Income Customers : Docket No. P-2022-
and Authorization to Track Costs as a :
Regulatory Asset for Future Base Rate :
Recovery :

**PETITION OF THE PITTSBURGH WATER AND SEWER AUTHORITY FOR
PILOT PRIVATE SERVICE LINE LEAK REPAIR AND EXPANDED
CONSERVATION PROGRAM FOR ELIGIBLE LOW INCOME CUSTOMERS
AND AUTHORIZATION TO TRACK COSTS AS A REGULATORY ASSET FOR
FUTURE BASE RATE RECOVERY**

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Dated: January 3, 2022

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List of Supporting Exhibits

A	PWSA Press Release October 14, 2021 Enrollment in Bill Discount Program Exceeds 5,000 Customers
B	CAP Flyers English and Spanish
C	May 14, 2021 LIAAC Meeting Presentation
D	September 17, 2021 LIAAC Meeting Presentation
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F	PWSA’s Water Conservation Webpage
G	PWSA’s Leak Detection Webpage
H	Customer Usage Portal Flyer
I	Analysis of CAP Participant Accounts With Consecutive Months of High Consumption

I. INTRODUCTION

Pursuant to 52 Pa Code § 54.1 and Section III.F.7.c of the Commission approved Joint Petition for Settlement at Docket No. R-2020-3017951,¹ The Pittsburgh Water and Sewer Authority (“PWSA” or the “Authority”) requests approval to implement a Pilot Private Service Line Leak Repair and Expanded Conservation Program for Eligible Low Income Customers (“Pilot Program”) and to authorize PWSA to track the Pilot Program costs as a regulatory asset so that it may seek cost recovery in its next base rate filing. Should this cost recovery authorization request be denied, PWSA would rescind this Petition and would move to request to implement the Pilot Program as part of its next base rate case. The purpose of the Pilot Program is to offer no-cost repair for private service line leaks for eligible residential low income customers to further PWSA’s broader water conservation goals while also lowering the cost of service for eligible customers and lessening the burden of uncollectible expense for all ratepayers. Eligible customers may receive needed repairs to leaks on exposed plumbing and/or installation of water saving devices, including aerators, a low flow showerhead and/or a low flow toilet at a predefined, not-to-exceed cost with the potential for additional services based on further review of the specific circumstances and availability of program funds. Targeted conservation information and one-on-one assistance utilizing PWSA’s conservation tools will also be provided.

While eligible low income customers may participate in PWSA’s Bill Discount Program and are not required to pay for the first 1,000 gallons of usage, any additional usage is billed according to PWSA’s tariffed consumption rates. Addressing high water consumption occurring as a result of private service line leaks for eligible residential low income customers who cannot afford the cost of

¹ *Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority – Water*, Docket No. R-2020-3017951, Order entered December 3, 2020, adopting as own action the Recommended Decision dated October 29, 2020 which recommended approval of the Joint Petition for Settlement dated September 30, 2020 (see Appendix to the Recommended Decision for Terms and Conditions of Joint Petition for Settlement). Pursuant to Secretarial Letter dated December 8, 2021, the Commission granted the unopposed request of PWSA to extend the due date for the filing of this petition to January 3, 2022.

such repairs benefits those customers by lowering their overall cost of water service. It also benefits all of PWSA's ratepayers by reducing the amount of uncollectible costs that result from high consumption that is not within the customer's financial ability to address. By repairing service lines causing leaks, the goal of water conservation is also furthered, which has the added benefits of preserving a limited resource and protecting the environment by reducing local flooding and overflows of wastewater into streams, creeks and rivers that can result when excess water enters the wastewater conveyance system.

PWSA proposes to implement the program on a pilot basis for one year beginning on or after January 2, 2023 (subject to Commission approval). PWSA is proposing a \$400,000 program budget which includes three categories of costs: (1) PWSA staff time and materials development; (2) costs of a contractor or contractors to perform the in-home services; and, (3) costs of the materials needed to perform the in-home services. As part of the approval of this Petition, PWSA specifically requests the ability to seek recovery of the Pilot Program costs in future base rate filings.

As explained more fully below, the Pilot Program supports PWSA's broader initiatives to encourage water conservation while building upon PWSA's experience replacing lead private service lines and furthering the continued evolution of its low income customer assistance programs. For all these reasons, granting PWSA's Petition is in the public interest, and PWSA respectfully requests that the Commission grant this Petition and permit it to implement its proposed Low Income Line Leak Repair and Conservation Pilot Program. PWSA presented its initial proposals for the Pilot Program during its November 19, 2021 meeting with its Low Income Assistance Advisory Committee ("LIAAC"). PWSA also hosted an additional discussion on November 29, 2021 open to the parties of its prior rate case. Written and/or oral feedback about PWSA's initial proposals was offered by the Bureau of Investigation and Enforcement, the Office of Consumer Advocate, and Pittsburgh United. The Pilot Program proposed in this Petition includes consideration of all feedback offered.

Procedurally, PWSA respectfully requests that, after the due date for any interested stakeholders to file a written response to PWSA’s Petition, the Commission hold in abeyance further action on this Petition for 60 days or until March 25, 2022. During this period of time, PWSA proposes to discuss the filed comments with the stakeholders in an effort to determine whether a consensus position may be presented to the Commission. On or before March 25, 2022, PWSA will file a report with the Commission regarding the outcome of the discussions with the parties as well as any recommendations for further consideration of the Petition. The report will identify any areas where consensus was not reached. PWSA respectfully requests that the Commission await the filing of PWSA’s status report before taking any further action on the Petition.

In support of this Petition, PWSA states as follows:

II. BACKGROUND OF PWSA

1. PWSA, a municipal authority, is a body politic and corporate, organized and existing under the Pennsylvania Municipality Authorities Act, 53 Pa. C.S. §§ 5601, *et seq.* PWSA manages the water, wastewater conveyance and stormwater systems currently owned by the City of Pittsburgh (“City”) pursuant to a 1995 Capital Lease Agreement dated July 15, 1995 and which provides for PWSA’s purchase of the water supply, distribution and wastewater collection systems in 2025. PWSA’s management of the City’s assets and other details of their relationship are governed by 71 P.S. §§ 720.211 to 720.213.
2. PWSA became subject to the Commission’s jurisdiction effective April 1, 2018. *See* 66 Pa. C.S. § 3201 *et seq.* The Authority provides water service to approximately 80,000 residential, commercial and industrial customers in portions of the city of Pittsburgh; the borough of Millvale; and portions of Reserve, O’Hara, and Blawnox townships, Allegheny County. The Authority also provides wastewater conveyance and stormwater service to customers located in the city and conveys wastewater for portions of twenty-four neighboring communities. For the

purposes of this Petition, the customers to be served by the Pilot Program are those customers in the city of Pittsburgh and borough of Millvale who PWSA directly bills for water service.

3. The Commission has conducted numerous proceedings involving PWSA as the Authority continues to transition to the Commission’s jurisdiction including: (1) three base rate proceedings (Docket Nos. R-2018-3002645, *et al.*, R-2020-3017951, *et. al.*, and R-2021-3024773, *et. al.*); (2) Stage 1 of an overall Compliance Plan Proceeding (Docket Nos. M-2018-2640802 and M-2018-2640803); and, (3) a Long-Term Infrastructure Improvement Plan (“LTIIIP”) proceeding (Docket Nos. P-2018-3005037 and P-2018-3005039). Stage 2 of PWSA’s Compliance Plan Proceeding regarding customer service issues was referred to the Office of Administrative Law Judge (“OALJ”) by Secretarial Letter dated August 5, 2021 and is proceeding pursuant to an approved litigation schedule (Docket Nos. M-2018-2640802 and M-2018-2640803). Stage 2 of PWSA’s Stormwater Compliance Plan is pending the filing of a revised Stormwater Compliance Plan by PWSA and a second report and directed questions from the Commission’s Bureau of Technical Utility Services identifying any Stage 2 Compliance Plan issues pertaining to stormwater compliance remaining to be referred to the currently progressing Stage 2 proceeding.²
4. At the same time PWSA has been transitioning to Commission jurisdiction, it has been engaging in substantial efforts to update and improve nearly every aspect of operating the water and wastewater systems. These initiatives include addressing years of deferred infrastructure investments through an aggressive capital program focused on repairing systems and creating needed redundancies to avert a complete system failure. PWSA has also been working with other regulatory agencies, including the Pennsylvania Department of Environmental Protection,

² *Implementation of Chapter 32 of the Public Utility Code Regarding Pittsburgh Water and Sewer Authority – Stage 1*, Docket No. M-2018-2640802 and M-2018-2640803, Opinion and Order entered May 20, 2021, Ordering ¶6 at 24.

to redress past system deficiencies and move forward to a higher quality of service.

Additionally, PWSA is embarking upon the most substantial lead service line replacement program in the Commonwealth, replacing 8,827 lead service lines since 2016 with 19.9 miles of lead pipe replaced in 2020. PWSA has been upgrading its customer service experience to make processes easier and more transparent for customers. This effort has included a completely redesigned bill and website and more payment options available to customers as well as increases in staffing to better assist customers. Internally, PWSA is in the process of implementing a new Enterprise Resource Planning (“ERP”) system to better manage day-to-day business activities such as customer account maintenance, accounting, procurement, project management, risk management and compliance. Once implemented, the ERP will significantly streamline internal operations, automate many processes that have been handled manually for years, and well-position PWSA to continue to focus on its overall goals of modernizing operations and providing superior customer service. Another significant initiative of PWSA has been to develop a comprehensive plan to mitigate issues associated with stormwater. On November 18, 2021, the Commission approved PWSA’s proposed stormwater fee and stormwater management plan, which will be implemented in 2022.

5. Parallel with all these initiatives, PWSA has remained committed to increasing enrollment in its customer assistance programs for low income customers and assisting all of PWSA’s customers to conserve precious water through an education campaign as well as the availability of various tools and information about the benefits of conservation.³ Through the formation of the PGH2O Cares team in February 2021, PWSA was able to increase enrollment in its Bill Discount Program by 20%. The purpose of the Pilot Program, which would be administered by the Cares team, is to allow eligible low income customers to realize the benefits of conservation through

³ See Exhibit A which is a press release from October 14, 2021 discussing PWSA’s enrollment of customers in the Bill Discount Program.

no cost private service line leak repair in recognition that these customers do not have the financial resources to undertake such repairs through their own resources and to provide one-on-one assistance to eligible customers regarding PWSA's available conservation tools.

A. Existing Low Income Customer Assistance Programs

6. PWSA's current suite of offerings to eligible low income customers has been on a continual path of evolution since the fall of 2017 (prior to being regulated by the Commission). A number of significant enhancements and refined program elements of PWSA's low income customer assistance programs have been implemented through the course of Commission approved settlements of PWSA's prior litigation proceedings. These elements have included changes to the level of discounts provided and/or eligibility requirements. Below is the current status of the programs (additional changes will become effective on January 12, 2022 as a result of the Commission's November 19, 2021 final order at docket number R-2021-3024773):⁴

- **Bill Discount Program** provides customers who are $\leq 150\%$ of the Federal Poverty Level (FPL) with their first 1,000 gallons of water/wastewater without charge.⁵
 - Customers who are $\leq 50\%$ of FPL receive an additional 20% reduction in their volumetric charges (usage over the minimum).
 - Arrearage Forgiveness of \$15 for each on-time payment in an active plan.
 - Recertification period lengthened from every year to every 2 years.
- **Winter Moratorium** runs December 1st through March 31st for eligible customers who are $\leq 300\%$ of FPL; tenant-occupied properties may not be terminated for non-payment in the winter.
- **Annual Hardship Grant** up to \$300 for customers who are $\leq 150\%$ of FPL and carry a past due balance; sincere effort of payment waived until 2022 and cut in half thereafter (\$75/\$37.50 for seniors).
- **Lead Service Line Replacement Reimbursement Program** assists customers with the cost of private lead service line replacement if customers choose to proactively hire a plumber and complete the work (prior to replacement pursuant to PWSA's Small Diameter Water Main Replacement Program). The level of reimbursement is based on income.

⁴ Exhibit B is a flyer (in English and Spanish) developed by PWSA to explain its Customer Assistance Programs.
⁵ PWSA also assists customers with applications to the Allegheny County Sanitary Authority ("ALCOSAN") Clean Water Assistance Fund which provides quarterly \$35 grants to customers who are $\leq 150\%$ of FPL. ALCOSAN provides wastewater treatment and is not regulated by the Commission although PWSA does include ALCOSAN's charges on its bills.

7. In addition to enhancing various programmatic elements over the years, PWSA has also made improvements regarding data elements (including the creation of a “confirmed low income” identifier) to be tracked, measured and available. Also, to further support the continued evaluation of PWSA’s programs, including outreach to the customers who could most benefit from the programs, PWSA commissioned a Household Affordability Analysis dated December 15, 2019 which provided valuable (and before unknown) insights about PWSA’s service territory demographics. PWSA uses the information provided in this study, as well as low income customer source data mapping developed as part of the study, to direct outreach where it may most benefit customers.
8. On at least a quarterly basis since PWSA’s initial rate case filing in 2018, PWSA meets and collaborates with interested stakeholders participating in the LIAAC. The LIAAC meetings foster the sharing of ideas, concerns, areas of interest, and suggested plans of action to further assist the most vulnerable of PWSA’s customers in dealing with increasing water and wastewater rates; the non-payment of which would threaten their access to clean water. PWSA has invited guest speakers involveMINT and the University of Pittsburgh Graduate School of Public and International Affairs (GISPIA) to the LIAAC to share their research and proposals to further assist low income customers. PWSA also provides substantial information to committee members regarding its various initiatives related to its low income customer assistance programs.⁶
9. In PWSA’s 2020 rate case, the Commission approved the creation of a PGH2O Cares team to ramp up efforts to increase enrollment as well as to incentivize conservation.⁷ The goals in formulating the PGH2O Cares team were to: (1) consolidate PWSA’s low income customer

⁶ See Exhibit C May 2021 LIAAC meeting presentation; Exhibit D September 17, 2021 LIAAC meeting presentation; and, Exhibit E November 19, 2021 LIAAC meeting presentation.

⁷ See *Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority*, Docket Nos. R-2020-3017951 (water) and R-2020-3017970 (wastewater) Final Order entered December 3, 2020.

assistance programs under one umbrella of care; (2) build a team of PWSA employees focused on increasing enrollment in the programs and promoting conservation; and, (3) utilize the team to meet customers in their environments and educate them about PWSA's offerings.

10. Since its formation in mid-February 2021, the PGH2O Cares team has worked to achieve its primary goal of increasing enrollment in PWSA's customer assistance programs. A primary focus of these efforts is participating in community virtual and in-person events to meet consumers in their neighborhoods and discuss the availability of PWSA's customer assistance programs.⁸ While in-person opportunities have been limited due to the COVID-19 pandemic, outreach was accomplished through the available in-person opportunities as well as virtual community meetings, bill inserts and newsletters, press releases, a Post-Gazette Email Campaign, a Google Ad campaign, various social media posts, and articles published by third parties (i.e. Public Source) regarding PWSA's programs.⁹
11. In addition to community outreach and public campaigns about PWSA's low income customer assistance offerings, the PGH2O Cares team undertook an extensive audit of enrollment processes to ensure that eligible customers are being accurately enrolled in the programs. As a result of the audit, PWSA has implemented process improvements, including on-going accuracy reviews and outreach to applicants where necessary. The PGH2O Cares team now manually tracks, reviews, and edits daily enrollment data and contacts customers when necessary to maintain more accurate enrollment records. These efforts help to ensure that all eligible customers have access to the assistance made available by PWSA's various low income customer programs.¹⁰

⁸ See, e.g., Slide 4 of Exhibit D for a list of Community Meetings and Events May 2021 through August 2021 and Slide 2 of Exhibit E for events from September 2021 through October 25, 2021

⁹ See Slides 20-25 of Exhibit C, Slides 16-20 of Exhibit D, and Slides 9-10 of Exhibit E.

¹⁰ The process of PWSA's audit as well as its findings were shared and discussed at the May 14, 2021 LIAAC meeting to provide transparency to stakeholders and to solicit any suggestions or feedback on further actions that could be taken to support the goals of the PGH2O Cares team. See Slides 5-8 of Exhibit C. Additional updates were provided during the September 17, 2021 LIAAC meeting. See Slide 8 of Exhibit D.

12. The PGH2O Cares team has also been actively investigating partnerships with other utilities providing services to PWSA’s customers. For example, PWSA has been working with Duquesne Light Company (“DLC”) to develop a cross-enrollment partnership. For customers who receive both PWSA and DLC services, in the first few weeks of partnership, PWSA has shared contact information of 119 customers with DLC and DLC has shared contact information of 7 customers with PWSA for cross-enrollment purposes. The sharing of customer contact information will enable PWSA to reach more customers to ensure that they are aware of PWSA’s customer assistance programs. Receiving the information from DLC is a reasonable indicator that the customer may be eligible to enroll in PWSA’s programs, given his or her enrollment with DLC, and presents another lead for PWSA to follow, which may not have been in PWSA’s purview prior. The PGH2O Cares team has also been in touch with two other utilities in PWSA’s service territory and is hopeful that similar collaborative efforts will be implemented for the benefit of their mutual customers.¹¹

13. The progress of the PGH2O Cares team in increasing enrollment is evident in current enrollment numbers. Most notably, enrollment in the Bill Discount Program has increased by 68% since May 2019 and by 20% from year end 2020. Enrollment in the Bill Discount Program provides consumers with their first 1,000 gallons of usage (wastewater conveyance and/or water) without charge. The below chart illustrates the current participation in all of the low income customer assistance programs:

Assistance Program	Number of Participants
Bill Discount	5217
Arrearage Forgiveness	1471
BDP 20%	1142
Hardship Grant	378

¹¹ See Slide 7 of Exhibit E.

14. The PGH2O Cares team has established a solid base upon which to leverage its existing processes regarding enrollment, customer outreach, and inter-utility information sharing to support the Pilot Program. In addition, PWSA proposes to add another full time employee to be assigned to the Cares team for purposes of implementing and conducting the Pilot Program. The proposed expanded staffing and administration of the Pilot Program by the PGH2O Cares team is a natural and reasonable progression of their current duties. The above-documented success of the PGH2O Cares team provides demonstrable evidence that PWSA can efficiently and effectively implement this proposed Pilot Private Service Line Leak Repair and Expanded Conservation Program for Eligible Low Income Customers in a way that will provide benefits for all PWSA customers.

B. Existing Conservation Efforts

15. Incentivizing water conservation is another important goal for PWSA. New web content about water conservation was introduced in December 2019.¹² The information provided includes an explanation about why water conservation is important as well as a list of suggested everyday conservation practices and information about the benefits of efficient appliances. Additional content includes a Leak Detection page, which addresses how to identify problems due to leaking toilets, faucets, showerheads and other plumbing.¹³ Leveraging its Advanced Metering Infrastructure (“AMI”) database containing hourly customer meter readings, and to provide more individualized information to consumers about their water usage, PWSA created a free online Customer Usage Portal where customers can track their real-time water usage and receive alerts when there is a spike in consumption.¹⁴

¹² See Exhibit F for a copy of PWSA’s Water Conservation webpage (also available at: <https://www.PGH2O.com/residential-commercial-customers/tips-maintenance-prevention/water-conservation>)

¹³ See Exhibit G for a copy of PWSA’s Leak Detection webpage (also available at: <https://www.PGH2O.com/residential-commercial-customers/tips-maintenance-prevention/leak-detection>)

¹⁴ The Customer Usage Portal webpage is available at <https://www.PGH2O.com/residential-commercial-customers/account-billing-info/check-your-water-usage>. See Exhibit H for a copy of a Customer Usage Portal flyer PWSA developed to be distributed.

16. In addition to creating content and tools for customer usage, PWSA proactively reviews AMI data and customer bills on a monthly basis looking to identify high consumption, which is defined as monthly consumption that is greater than or equal to 200% of the previous reading and over 9,000 gallons. Once identified, PWSA sends a letter (mailed the same day as the bill) to the customer, advising him or her that their current usage is higher than average consumption and recommending that he or she check for internal leaks if there is no known explanation as to why usage has increased. In situations where the consumption is extremely high and is occurring daily, PWSA staff will attempt to telephone the customer. If unreachable, an emergency shut at the curb will be initiated. If it is determined that the leak is coming from the customer's private side of the water service line, pipe, fixture or appliance, PWSA will notify the customer that a registered plumber must be retained to perform the necessary repairs. For continuing unrepaired leaks on the private side, PWSA may also issue a Waste of Water 10-Day Notice of termination and, if no response, a 3-Day Shut Off Notice whereby the water service will be terminated. If the leak on the customer's private line is causing damage to person or property, PWSA will move to terminate the water service at the curb stop until repairs can be made by the customer. For leaks on the public side, PWSA Field Operations personnel triage based upon size of the water main, area of the rectangular split/circular break/hole in pipe, and the number of affected customers.

17. Customers are responsible for the costs of repairing leaks that occur on the private side of the water service line. To do so, they must hire and pay for a registered plumber to perform the necessary repairs. Generally, the costs of these repairs may range between \$500.00 and \$800.00. PWSA recognizes that low income customers may not have the financial resources to cover these costs. Further, while there are plumbing companies in the Pittsburgh area that on occasion perform pro bono work for religious organizations, low income customers, and the elderly, PWSA recognizes that its low income customers may not have the time and resources available

to identify these companies. For these reasons, and also in furtherance of PWSA's prior Commission approved settlement commitments, PWSA requests approval of the proposed Pilot Program and described further below.

III. PROPOSED PILOT PROGRAM

18. The purpose of the Pilot Program is to build upon both PWSA's commitment to provide assistance to eligible low income customers and to support its efforts regarding water conservation.

A. Eligibility

19. PWSA proposes that the most effective and efficient way forward is to determine eligibility in line with that of its Bill Discount Program, i.e., to set eligibility at or below 150% of FPL. PWSA already has systems in place to identify customers who meet this income eligibility threshold since it is used to determine eligibility for enrollment in the Bill Discount Program and the Hardship Grant Program. Therefore, PWSA would not need to create new or different systems to identify eligibility for the Pilot Program.

20. Further, the Bill Discount Program has the highest level of year round enrollment of all PWSA's customer assistance programs, making this a good place to start to identify qualifying customers who may benefit from the Pilot Program. Customers who are enrolled in the Bill Discount Program are identified with a specialized rate code in PWSA's billing system.

21. PWSA already has a current robust system of identifying high consumption through its bill editing process. High consumption is defined as monthly consumption that is at or greater than 200% of the previous reading and over 9,000 gallons. PWSA's processes generate a list of accounts that meet this criteria in the pre-bill editing process. For high consumption accounts, PWSA contacts the customer to discuss the usage. PWSA will also send the customer a High Consumption notice, which is timed to be received by the customer at the same time that he or she receives the bill with the high use. PWSA is proposing to focus only on the accounts

meeting its definition of high consumption for the Pilot Program. If, however, PWSA is not identifying enough properties eligible to receive services based on this criteria, then PWSA proposes to maintain the discretion to lower the high consumption thresholds as may be appropriate to ensure that the approved Pilot Program budget is utilized to provide the services.

22. Because PWSA proactively identifies accounts with high consumption on a monthly basis, the PGH2O Cares team can further review the accounts and determine which of them meet the income eligibility requirement based on their enrollment in the Bill Discount Program. Aside from active participation in the Bill Discount Program, the PGH2O Cares team will investigate whether there are any other account indicators identifying the customer as potentially eligible for the Pilot Program. Such indicators may include an internal designation that the account has been confirmed low income or that the customer may have previously participated in the Bill Discount Program. In all cases, the PGH2O Cares team will make direct contact with the customer to assess eligibility and to discuss the Pilot Program with the customer. For a tenant-occupied property, PWSA will attain access to the property by any adult person in the residence. While PWSA will not require written consent to assess a property, written consent will be required as a condition of performing any repair services. The offerings of the Pilot Program include leak line repair and/or installation of water saving devices and conservation education. All eligible customers, regardless of whether or not they are tenants, will have access to conservation education.

23. To be eligible, the property owner must provide written consent to the repairs by signing PWSA's to-be-developed terms for providing the services (as discussed further below). If the property is occupied by a tenant who meets the income eligibility requirements, then PWSA will rely on that information to satisfy the income requirements for services. PWSA will not provide in home repair services for tenant occupied properties without the property owner's consent, although PWSA retains the authority as set forth in its current Commission-approved tariff to

make the necessary repair or replacement and to charge the property Owner with the reasonable cost of the repair or replacement where a leak is creating a public hazard or damaging public infrastructure, as determined by PWSA.¹⁵ PWSA is proposing to provide additional information and resources to tenants in this situation as described further below. Regardless of property owner cooperation regarding in home repairs, all eligible tenants will qualify to receive the conservation benefits of the proposed Pilot Program.

24. No cost repair services will be offered to an eligible property at the initial not-to-exceed cost. The specific repair services to be offered will be based on the needs of the property as may be implemented within the initial not-to-exceed cost. Those repairs that will have the most significant impact on reducing usage will be prioritized. If a determination is made by the contractor that additional repairs beyond the initial not-to-exceed cost repairs could be beneficial, that information will be documented by the Cares team and will be further evaluated to determine whether or not the additional work would be cost beneficial based on the application of PWSA's guidelines.
25. All work will be performed by licensed plumbing contractors. If, upon the date set for the initial repair work, the contractor identifies an urgent need that the contractor can address at that time, but which exceeds the scope of the initial not-to-exceed budget, the contractor will be directed to contact the PGH2O Cares team. Additional repair work may be authorized upon consideration of PWSA's guidelines.
26. PWSA is proposing guidelines with ranking and a scoring mechanism to prioritize the properties to receive services and to assess whether or not to offer additional services.
27. The elements of PWSA's ranking and scoring guidelines are:
 - the level of the daily high consumption – 10 points

¹⁵ See PWSA Tariff Water – Pa. P.U.C. No. 1, Part III.B.12.e, Original Page No. 35.

- the estimated dollar amount of damage caused to the customer’s property by the leak – 20 points
- the amount of outstanding unpaid charges for the property – 20 points
- the anticipated effect of the proposed repairs on reducing the high consumption, resulting in significant bill savings and usage reductions for the customer – 8 points for a leak repair, 8 points for a toilet repair, and 4 points for a showerhead repair for a total of 20 points
- the number of other properties eligible for services from the remaining budget such that if other properties are known to be eligible for one-time assistance, and they would contribute to the 250 customer goal, then a customer requesting repeat assistance would not receive any points – 30 points

28. These guidelines will be used both to prioritize initial projects and to evaluate whether further services beyond the initial not-to-exceed budget should be offered to properties already receiving services. If a property is deemed ineligible for additional repairs based upon application of PWSA’s guidelines at the time that scoring is performed, scoring can be performed multiple times throughout the Pilot Program if funds remain available.

29. PWSA will not provide in home repair services for tenant occupied properties without the property owner’s consent. However, PWSA is proposing to provide additional information and resources to tenants in this situation as described further below.

B. Services Offered

30. Eligible properties may receive a repair of a leak on exposed plumbing and installation of: (1) two faucet aerators, (2) one low flow showerhead; and, (3) one low flow toilet replacement. The proposed not to exceed cost of these three services is \$1,346. PWSA’s contractor will have the flexibility, based on the needs of the specific property, to determine which of these services or any combination thereof would best address the high consumption and may implement them so long as the cost to implement is within the not-to-exceed initial cost. Any additional services that may be required at the property will be noted by the contractor and reported to the PGH2O Cares team for further evaluation.

31. When PWSA is unable to secure property owner consent to perform work inside tenant occupied properties,¹⁶ PWSA proposes to work with community based organizations to develop appropriate information that can be provided to tenants to advise them of their options and available resources to pursue consent directly with the property owner.
32. The conservation component of PWSA's Pilot Program will include educating the customer about how to calculate water and wastewater charges to demonstrate how his or her water consumption affects the monthly billed amount. The PGH2O Cares team will also provide the customer with information about PWSA's Customer Usage Portal, including how to enroll and how to utilize it to track real-time water usage and set up alerts when there is an increase in water usage.
33. Additionally, in support of PWSA's efforts to remove lead service lines, the contractor will coordinate with PWSA's Plumbers to determine whether or not lead is present in the private service line. If it is, then PWSA personnel will assist the customer with navigating the Lead Service Line Replacement Program.

C. Process for Providing Services

34. The process for providing services will be similar to PWSA's no cost replacement of private water service lead lines,¹⁷ and, if approved, PWSA anticipates submitting a tariff supplement to incorporate the program terms in its tariff. Pursuant to PWSA's current, Commission approved Water Tariff, PWSA enters into an agreement with a property owner for replacement of a customer lead service line that allows PWSA employees and contractors to gain access to the private property to replace the line. The form is developed by PWSA and includes provisions that require the property owner to release and hold harmless PWSA from any and all claims, causes of action, damages or losses, of any nature, whatsoever with respect to the work

¹⁶ It is PWSA's understanding that certified plumbers are unable to perform any work inside the home without the consent of the property owner.

¹⁷ PWSA Tariff Water – Pa. P.U.C. No. 1, Part VI.4, Original Page No. 70.

performed by PWSA or its contractors. After the replacement of a customer service line, the Water Tariff makes clear that the customer continues to own the line and shall have full responsibility for the repair, replacement and maintenance of the new line.

35. PWSA proposes to implement the Pilot Program pursuant to similar terms. Once a Bill Discount Customer is identified as experiencing high consumption through PWSA's pre-bill editing process, a PGH2O Cares team member will reach out to the customer via telephone. If PWSA does not have a current telephone number for the eligible customer, then the Cares team member will visit the property in an attempt to contact the customer. Once contact is made, the Cares team member will assist the customer with leak detection in the home. If a leak is discovered in an exposed pipe and/or device, the Cares team member will review an agreement with the customer that will allow PWSA's contractor to make repairs in the property. The customer must sign this agreement before any work by PWSA's contractor can commence. When the agreement is signed, the Cares team member will contact the contractor to schedule the soonest available appointment for the repair work to be conducted in the home. After the work has been completed, the contractor will review what has been fixed or replaced with the customer and will discuss the warranty on services and parts, if applicable. PWSA is not proposing to offer any additional warranty on parts or labor beyond what is offered through the manufacturer.

D. Education and Outreach

36. A significant component of PWSA's proposed outreach to customers is that the PGH2O Cares team will be directly contacting customers experiencing high consumption based on PWSA's pre-bill editing process. As such, PWSA's Pilot Program will be specifically targeted to those known customers experiencing high usage and, therefore, is narrowly tailored to reach those customers who may most benefit from the program.

37. Regarding a broader education and outreach plan, the Pilot Program will build upon the outreach that is already being performed by the PGH2O Cares team as described previously. For the Pilot

Program, PWSA will develop written materials to be distributed to potentially eligible customers, made available during community events attended by the PGH2O Cares team, included on PWSA’s website, inserted with PWSA’s bills in newsletters, and distributed to PWSA’s network of community partners. PWSA’s written materials will include English and Spanish versions. PWSA will share draft materials with members of its LIAAC to solicit suggestions and input before the materials are finalized.

E. Budget

38. PWSA is requesting approval of a budget of \$400,000 for the Pilot Program and authorization to track the Pilot Program costs as a regulatory asset for recovery as part of PWSA’s next base rate case. Should PWSA’s cost recovery authorization request be denied, PWSA would rescind this Petition and would move to request to implement the Pilot Program as part of its next base rate case. Below is a breakdown of the estimated costs:

LOW INCOME LINE LEAK REPAIR AND CONSERVATION PILOT PROGRAM

2023 Budget Item	Cost Breakdown	Total
PGH2O Cares New Full Time Employee		\$40,000
Program Agreement and Educational Materials		\$20,000
Contractor Leak Repair	\$800 * 250	\$200,000
Aerators	\$8*500	\$4,000
Low Flow Showerhead	\$30*250	\$7,500
Low Flow Toilet	\$500*250	\$125,000
Total		\$396,500

39. PWSA’s proposed budget includes three categories of costs: (1) PWSA staff time and materials development; (2) costs of a contractor to perform the in-home services; and, (3) costs of the materials needed to perform the in-home services.

40. PWSA is proposing to utilize a Request for Proposal (“RFP”) process to engage an independent contractor who will repair known leaks for eligible customers. The installation costs as well as

the cost of installed equipment will be included as part of the contract budget with the selected vendor. PWSA proposes a budget of \$340,000 for this purpose. This budget amount is based on an estimate that the Pilot Program will serve 250 customers, which estimate has been gleaned from the Cares team's assistance to 142 Bill Discount Program customers with high consumption in the Cares team's first 9 months in existence. The initial estimate of 250 customers receiving service through the Pilot Program is based on an anticipated one-time leak repair and replacement of two faucet aerators, one low flow showerhead, and one toilet per property.

41. PWSA proposes to limit the initial work to be done inside the property to a not-to-exceed budget of \$1,346. While this not-to-exceed amount is based on providing a one-time leak repair and replacement of two faucet aerators, one low flow showerhead and one toilet per property, the actual work to be done for an eligible property may vary based on the needs of the property. So long as the cost of the initial work to be done is within the not-to-exceed budget, the work will be performed at the time of the initial visit. Any additional services that may be required at the property will be noted by the contractor and reported to the PGH2O Cares team for further evaluation. PWSA's goal is to utilize the proposed total Pilot Program budget to provide services to as many eligible properties as possible. Thus, as the Pilot Program opens, limiting the initial costs to each property to the not-to-exceed budget is reasonable. PWSA will, however, evaluate properties that may benefit from additional services and reserves the ability to perform such additional work as may be appropriate based on the application of PWSA's guidelines and scoring.

42. PWSA's cost proposal also includes the costs of internal staff time to manage, implement and develop program materials and to perform education and outreach. These are costs that are incremental to the costs that are currently included in PWSA's base rates as a result of PWSA's most recent base rate case. Included in the budget proposal is the cost to employ a new full time

employee assigned to the PGH2O Cares team to focus exclusively on the Pilot Program. PWSA anticipates that the new PGH2O Cares team staff member will assist with the preparation of the Pilot Program agreements, identify and enroll potential eligible customers, prepare educational materials and outreach about the Pilot Program, and provide leak diagnosing tablets. In addition to that new employee's proposed salary, PWSA's budget includes the costs of developing the program agreement and education materials. PWSA estimates that the expenses to implement the Pilot Program will not exceed \$60,000 for the first year of the Pilot Program. To the extent all of these costs may be considered administrative costs and they total about 15% of the full budget proposal, PWSA submits that the costs are reasonable given this is a new program requiring new legal agreements, educational materials, and marketing. As part of the evaluation of the Pilot Program, PWSA will reconsider the costs of continuing to administer the program in future years, and, if PWSA elects to continue it beyond the pilot year, it will propose a budget consistent with the results of that evaluation. Report and Evaluation

43. PWSA is proposing the Pilot Program for a one year period as it is a new program with cost implications. A one year pilot period is a reasonable balance of the projected costs of the new program and time to evaluate whether or not the program is cost efficient and is providing measurable results. PWSA is proposing to allocate staff to the pilot who will be dedicated to tracking all activities and proactively reaching out to customers. PWSA's budget projections are based on the identification of 142 customers during the initial nine months of formation of the Cares team who would have benefitted from this program. PWSA has determined that the data related to these 142 customers is sufficient to determine average cost per repair volume of repair types and savings. Further data as will be received if the Pilot Program is approved and implemented will provide additional input as to the future of the program including the costs and benefits.

44. PWSA’s evaluation of the Pilot Program will focus on the number of participants who receive service, how the customer’s usage changed after receiving services, and how long any such benefits in conservation were maintained. PWSA will also keep track of the costs of the measures implemented to evaluate whether the costs of the Pilot Program were reasonable given the results of the program. PWSA will also track and identify the number of eligible properties which did not receive services as a result of the lack of agreement by the property owner.
45. PWSA proposes to file the result of its evaluation with the Commission three months prior to the end of the pilot period. The evaluation will also include PWSA’s recommendation as to whether or not to continue the pilot and, if so, any changes that are recommended for the future.

IV. APPROVAL OF THE PILOT PROGRAM IS IN THE PUBLIC INTEREST

46. PWSA is required by the Public Utility Code to furnish and maintain adequate, efficient, safe, and reasonable service and facilities.¹⁸ Pursuant to Section 523 of the Public Utility Code, the Commission may assess the just and reasonableness of a water utility’s proposed rates based on “action or failure to act to encourage cost-effective conservation by customers.”¹⁹ In furtherance of this statutory directive, the Commission adopted a Statement of Policy regarding water conservation measures which sets forth specific factors to be examined in assessing the action or failure of a water utility to act to encourage cost-effective conservation by their customers.²⁰ Both leak detection and conservation are included in the list of factors of the Statement of Policy. More specifically, the Statement of Policy directs that “a system of leak detection should be utilized on a regular basis, with leaks being repaired as expeditiously and economically as possible.”²¹ The Statement of Policy also requires evaluation of a conservation plan.²²

¹⁸ 66 Pa.C.S. § 1501.

¹⁹ 66 Pa. C.S. § 523(b)(5).

²⁰ 52 Pa Code § 65.20.

²¹ 52 Pa Code § 65.20(5).

²² 52 Pa. Code § 65.20(7).

47. PWSA's Pilot Program is consistent with the Public Utility Code and the Commission's regulations because it presents a reasonable way to address customer service line leaks and conservation for low income customers who would not otherwise be in a position to address such issues. PWSA recognizes that customers who are at or below 150% of the FPL are likely without the financial ability to pay to repair leaks on the customer owned water service line. So long as these leaks remain unaddressed, they increase costs for the affected customer as well as for all other ratepayers, in addition to needlessly wasting water in contravention of the goal of conservation. For the low income customer, his or her bill will be higher as a result of the imposition of consumption charges based on usage. For the non-low income customer, their costs are also higher both in terms of shouldering a larger burden of the uncollected costs incurred when the low income customer cannot pay the increased costs and paying the increased overall system costs that occur from the waste of water due to unrepaired leaks.
48. PWSA has carefully considered the costs of its proposed Pilot Program and the benefits to be realized by addressing these leaks and submits that adopting the Pilot Program is in the public's best interest. As noted previously, during the initial nine months of formation of the Cares team, PWSA has identified and assisted 142 Bill Discount Program participants with high consumption. For these customers, the amount billed for the high consumption totaled \$78,298.95.²³ The causes of the high consumption for these customers included issues that PWSA is proposing to address with its Pilot Program; i.e., exposed pipe leaks and/or leaking plumbing fixtures.²⁴ By proactively repairing leaks for these eligible customers as soon as they are identified in the pre-bill editing processes, PWSA can limit the costs incurred to provide wasted service, which benefits the program participant and all other ratepayers. If PWSA does

²³ See Exhibit H for a reacted version of the analysis of these accounts.

²⁴ PWSA will only credit customer accounts for high consumption through the ALCOSAN Leak Credit Request where proof of the leak repair is required to approve a credit adjustment.

not receive payment from these customers for the high consumption amounts billed, then the uncollectible expense costs to all ratepayers would likely increase.²⁵ PWSA also incurs operational costs to deliver the water that is billed. If leaks such as those discussed herein are permitted to continue unabated, then PWSA incurs unnecessary costs increase by providing the unneeded water service and, if the billed high consumption is unpaid, then the uncollectible accounts expense all ratepayers will bear is increased. In consideration of all these factors, PWSA believes the Pilot Program is a reasonable way to assist eligible customers regarding the unnecessary costs and expense that is created by unrepaired leaks for those who are least able to afford the costs of the repair and to reduce some of the costs to other ratepayers associated with high consumption.

49. Although there are no statutory or regulatory provisions requiring PWSA to offer the Pilot Program as proposed, the Commission’s regulations do require electric and natural gas utilities to “establish a fair, effective and efficient energy usage reduction program for their low income customers” (referred to as “LIURP”).²⁶ PWSA was informed by several sections of the Commission’s LIURP regulations in development of its proposed Pilot Program. These include: (1) allowing eligibility of tenants to participate so long as the landlord agrees;²⁷ (2) setting the income eligibility for customers to at or below 150% of the FPL;²⁸ and, (3) including the repair or replacement of service lines.²⁹ Also consistent with PWSA’s cost recovery proposal, the Commission’s LIURP regulations state that program expenses shall be allotted among all ratepayers with the “precise allocation between capital and expense accounts [to] be determined in future rate proceedings.”³⁰ While the Commission’s LIURP regulations are not applicable to

²⁵ It should be noted that the high consumption cost of \$78,298.95 for these customers is a snapshot in time. The longer the leaks continue, the higher the costs incurred which would be recovered from all ratepayers.

²⁶ 52 Pa. Code § 58.1.

²⁷ 52 Pa. Code § 58.8.

²⁸ 52 Pa. Code § 58.2.

²⁹ 52 Pa Code 58.14(a)(1).

³⁰ 52 Pa. Code §58.4(e)(1).

water utilities, they do provide evidence of the Commission's support of these programs and provide additional support for the various proposals contained in PWSA's proposed Pilot Program.

50. PWSA is unaware of other Commission regulated water utilities that provide no cost repair of the customer's water service lines. However, several Commission regulated water utilities do provide water-savings kits at no cost to customers.³¹ PWSA also considered a program offered by the Philadelphia Water Department ("PWD") even though PWD is not regulated by the Commission. For qualifying low income customers who are at or below 150% of FPL, PWD provides a complete in-house water inspection/audit, repair/replacement of minor plumbing problems, installation of water conservation devices and water conservation information and education.

51. Based on its own experience with its low income customer assistance programs and consumption by consumers, as well as consideration of the Commission's expressed policies and offerings of other utilities (including the electric and natural gas distribution companies), PWSA believes its proposed Pilot Program supports the requirement to furnish and maintain adequate, efficient, safe, and reasonable service and facilities while also assisting customers with water conservation. Since the program benefits all customers, including the participants and non-participants, it is in the public interest to permit PWSA to implement the Pilot Program as set forth in this petition.

³¹ American Water's H2O Help to Other Program offers qualifying customers a water-saving kit that includes a low-flow shower head, faucet aerators, a toilet and diverter and non-toxic leak-detecting dye tablets. Aqua American's Helping Hand program provides eligible customers a complimentary water conservation kit with information about how to detect and fix leaks and to identify and make minor plumbing repairs that can help reduce consumption. The kit includes leak detection tablets, a low-flow shower head and faucet aerators.

V. APPROVAL TO TRACK PILOT PROGRAM COSTS AS REGULATORY ASSET AND SEEK COST RECOVERY IN FUTURE RATE CASE IS IN THE PUBLIC INTEREST

52. PWSA requests authorization to track the Pilot Program costs as a regulatory asset and seek cost recovery in its next base rate filing. If the requested authorization is not approved, then PWSA would rescind this Petition and move to request to implement the Pilot Program as part of its next base rate case. Addressing cost recovery as part of this petition is important to provide clarity for ratepayers and ensure that the proposed Pilot Program can be appropriately funded without increasing costs on all ratepayers. For all the reasons previously explained, PWSA has determined that implementing this Pilot Program prior to its next base rate case will provide benefits for all its ratepayers, but authorization to defer cost recovery to the next base rate case is critical. By implementing the program on a pilot basis for a year period, PWSA will be able to evaluate it and make a better informed determination about whether or not a more permanent program could be implemented in the future. A one year pilot period with a defined budget also constrains costs to all ratepayers for this program. Given the Commission approved settlement of PWSA's most recent rate case at Docket No. R-2021-3024773, PWSA is not expected to file a general rate increase pursuant to 66 Pa. C.S. § 1308(d) any sooner than March 2023 for rate implementation in January 2024.³² Approval of PWSA's request to track Pilot Program costs as a regulatory asset will enable it to implement the Pilot Program one year prior to potential new rate implementation in January 2024.

53. The ability of utilities to defer recovery of the costs for possible future rate recovery has been an integral part of traditional rate regulation by the Commission and has been used to defer recovery of costs for a variety of situations, including storm damage costs, environmental costs, pension and post-retirement costs, and implementation costs of Commission directed

³² See, e.g., *Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority*, Docket No. R-2021-3024773, et. al., Order entered November 18, 2021, adopting as own action the Recommended Decision dated October 6, 2021 (see Section 9.A.3 on p. 15 of the RD which sets forth the settlement commitment).

requirements.³³ For PWSA, the Commission has authorized PWSA to track COVID-19

Expenses as a regulatory asset and seek cost recovery for ratemaking purposes in its next rate case filing.³⁴

54. PWSA’s request for authorization to treat Program Pilot costs as a regulatory asset and seek cost recovery in its next rate case filing is reasonable for several reasons. First, PWSA is submitting this petition consistent with Commission directives “file a Petition for a proposed line repair and conservation program. . . [to] include a proposal for the line repair for low income customers as well as a cost recovery proposal.”³⁵ Second, PWSA proposes to maintain a detailed accounting of all Pilot Program costs and exercise prudent efforts to maximize its utilization of and track any government benefits that may become available to fund the budget for the Pilot Program. PWSA will provide all available information as part of its next rate case filing. As such, PWSA is committed to identifying and using any other available funding for purposes of the Pilot Program as may become available. Third, PWSA acknowledges that even if the Commission grants this Petition and permits it to seek recovery of the Pilot Program costs in its next rate case, all parties reserve the right to review the prudence and reasonableness of any costs claimed in that future proceeding.

55. Accordingly and consistent with Commission direction to file this petition and Commission precedent permitting the creation of a regulatory asset as proposed here, PWSA requests

³³ See, e.g., *Duquesne Light Company Plan for Seamless Moves and Instant Connects*, Docket No. M-2014-2401127, Final Order entered September 3, 2015 at 12; *Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days In a Billing Period*, Docket No. P-2014-2446292, Order entered December 4, 2014 at 18; *Petition of Pennsylvania American Water Company for Authority to Defer Expenses Incurred to Pay New Regulatory Fees Imposed by the Pennsylvania Department of Environmental Protection*, Docket No. P-2019-3008253, Opinion and Order entered May 9, 2019.

³⁴ See, e.g., *Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority*, Docket No. R-2021-3024773, et. al., Order entered November 18, 2021, adopting as own action the Recommended Decision dated October 6, 2021 (see pp. 65-71 of the RD discussing the COVID-19 settlement terms). Approval of the settlement terms was consistent with the Commission’s directive in its Order entered July 15, 2021 at Docket Nos. M-2020-3019244 and M-2020-3019775.

³⁵ See, Section III.F.7.c of the Commission approved Joint Petition for Settlement at Docket No. R-2020-3017951.

approval to create a regulatory asset into which the costs of the Pilot Program would be recorded and presented as part of the next base rate case for recovery.

VI. SUGGESTED PROCEDURAL PROCESS

56. To implement the Pilot Program on January 2, 2023 as proposed herein, PWSA respectfully requests that the Commission issue an order granting this petition on or before its September 15, 2022 public meeting. Approval of the petition on or before this date will provide PWSA with the appropriate lead time necessary to implement the program on January 2, 2023. Some of the tasks that will need to be accomplished upon final approval of the Pilot Program (and which cannot be undertaken until such approval) include submission of tariff language for the Commission's consideration, preparation and issuance of a Request for Proposals to secure the contractor who will do the in-home repairs, final development of educational materials, drafting of legal agreements, staff training, and the hiring of the additional PGH2O Cares team member.
57. PWSA respectfully requests that, after the due date for any interested stakeholders to file a written response to PWSA's Petition, the Commission hold further action on this Petition in abeyance for 60 days or until March 25, 2022. During this period of time, PWSA proposes to discuss the filed comments with the stakeholders in an effort to determine whether a consensus position may be presented to the Commission. On or before March 25, 2022, PWSA will file a report with the Commission regarding the outcome of the discussions with the parties as well as any recommendations for further consideration of the Petition. The report will also identify any areas where consensus was not reached. PWSA respectfully requests that the Commission await the filing of PWSA's status report before taking any further action on the Petition.
58. While PWSA is hopeful that upon the filing of its status report the Commission will be well-positioned to grant the Pilot Program without need for further proceedings, to the extent the Commission elects to refer this matter to the Office of Administrative Law Judge ("OALJ"), PWSA requests flexibility to present to the assigned Administrative Law Judge a path to resolve

issues among the parties cooperatively and to reserve a more formal litigation process if consensus is not possible. Permitting such flexibility if this matter were to be referred to the OALJ is a reasonable way to ensure the efficient and cost effective use of the Commission and other parties' resources.

VII. CONCLUSION

WHEREFORE, The Pittsburgh Water and Sewer Authority respectfully requests that the Commission grant this Petition and permit it to implement its proposed Pilot Private Service Line Leak Repair and Expanded Conservation Program for Eligible Low Income Customers and authorize PWSA to track the Pilot Program costs as a regulatory asset and seek cost recovery in its next base rate filing.

Respectfully submitted,



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*Counsel for
The Pittsburgh Water and Sewer Authority*

Dated: January 3, 2022

VERIFICATION

I, Julie Quigley, hereby state that: (1) I am the Director of Customer Service for The Pittsburgh Water and Sewer Authority (“PWSA”); (2) the facts set forth in the foregoing Petition are true and correct (or are true and correct to the best of my knowledge, information and belief); and, (3) I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 01/03/2022 | 11:50 AM PST

DocuSigned by:

Julie A. Quigley

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Julie A. Quigley
Director of Customer Service
The Pittsburgh Water and Sewer Authority

PWSA

Petition for Approval of
Pilot Private Service Line

Leak Repair

Exhibit A



FOR IMMEDIATE RELEASE

October 14, 2021

Media Contact:
412-430-3898

Enrollment in PWSA's Bill Discount Program Exceeds 5,000 Customers

**A 68% increase since May 2019 shows the benefit of consistent
outreach, simplified enrollment**



Pittsburgh, PA - With each event that the PGH2O Cares team attends and each phone call our Customer Service Representatives take, word is getting out about our Customer Assistance Programs and the benefits they provide.

This is evident in current enrollment numbers for our Bill Discount Program - 5,010 customers as of today, October 14, 2021. This is an increase of 68 percent since May of 2019 and approximately a 20 percent increase from the end of 2020, prior to launching PGH2O Cares – a team of outreach and education

specialists dedicated to enrolling customers in these important programs.

“We have worked hard to expand our customer assistance programs and it is now part of the culture at PWSA,” Will Pickering, CEO of the Pittsburgh Water and Sewer Authority said. “We routinely collaborate with community partners to make our programs accessible to the customers who need them the most. The progress we have made this year to increase enrollment demonstrates our organizational-wide commitment to our customers.”

When we first introduced our customer assistance programs in 2018, the goal was to provide our most financially vulnerable customers with assistance to reduce their water and wastewater conveyance bills and to protect them from rate increases. We estimate that 23 percent of our approximately 111,000 customers are eligible to enroll in our customer assistance programs – today, about 19 percent of all potentially eligible customers are enrolled.

The Bill Discount Program provides the most immediate benefits and is available to customers who are earning an annual income that is less than or equal to 150 percent of the Federal Poverty Level (FPL). When first established, it offered a discount of approximately \$26.00 on the base rate for water and sewer charges. In 2021, the program benefit increased to \$35.78 – providing a 100 percent discount so that the first 1,000 gallons of water are free. It also includes a 20 percent discount on water and sewer charges for very-low-income customers. Additionally, customers who are enrolled in the Bill Discount Program and on a payment plan will receive a \$15 credit for each on-time payment to forgive and more quickly pay off any past due balances.

Other assistance programs include the Winter Shutoff Moratorium, which protects customers who are at or below 300 percent of the FPL from water shutoffs during the winter months, and the Hardship Grant Program that offers up to \$300 annual grants to customers to put towards their past due charges.

2021 Enrollment Numbers for our programs are as follows:

Program	Customers Currently Enrolled
Bill Discount Program	5,010
60 Month Payment Plan	1,278
Bill Discount Program + 20%	1,057
Winter Shutoff Moratorium	All customers enrolled in the Bill Discount Program are automatically enrolled in the Winter Shutoff Moratorium
Hardship Grant	259

Increased outreach is a contributing factor to the improved enrollment numbers. Due to the launch of the PGH2O Cares team in January, enrollment numbers have steadily increased. Since February of this year, they have attended 36 community events, presented at community meetings, and are tabling at Farmers Markets each week in Carrick, East Liberty, and the Northside to build awareness about our programs and encourage customers to enroll. We also provide organizations like the Greater Pittsburgh Food Bank and the Carnegie Library of Pittsburgh with flyers to distribute to patrons, and we are partnering with Welcome Pittsburgh to identify better ways to reach non-English speaking customers.



PGH2O Cares also contacts customers by phone and works one-on-one with them to explain the benefits of the program and can now enroll customers in some of our programs on the spot.

Simplifying the enrollment process has made our assistance programs more appealing. Eligible customers are asked to report their income over the phone rather than providing proof of income and are recertified every two years rather than annually. When a customer's enrollment in the Bill Discount Program is set to expire, we notify them by mail and will follow up with a phone call if they don't respond. The first round of recertification letters are being mailed in October.

We have also taken greater advantage of our website and digital marketing to build awareness about these programs. The Customer Assistance Programs are prominently displayed in two places on the homepage of www.pgh2o.com, and we implemented a Google AdWords campaign to build awareness and drive web traffic to the customer assistance page on our website. This has resulted in more than 10,000 page views since launching the campaign in March. We will soon offer a webform that allows customers to enroll in the Bill Discount Program online.

"Proactive outreach and simplifying enrollment are two distinct improvements that PWSA has made to grow our customer assistance programs," stated Julie Quigley, Director of Customer Service for the Pittsburgh Water and Sewer Authority. "Customers are not always comfortable asking for assistance. We have gone the extra mile to reach out to our customers to offer a streamlined enrollment process. The PGH2O Cares team has demonstrated success through their efforts in this, their inaugural year."

For more information about our customer assistance programs or to learn if you are eligible, please visit www.pgh2o.com/cap or contact PGH2O Cares by calling (412) 255-2423 x3107 or emailing cares@pgh2o.com.

About PWSA

The Pittsburgh Water and Sewer Authority (PWSA) is the largest combined water, sewer and stormwater authority in Pennsylvania, serving 300,000 consumers throughout the City of Pittsburgh and surrounding areas.



The Pittsburgh Water and Sewer Authority | 1200 Penn Avenue, Pittsburgh, PA 15222
(412) 255-2423 | www.pgh2o.com

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PWSA

Petition for Approval of
Pilot Private Service Line

Leak Repair

Exhibit B

PGH₂O Customer Assistance Programs

Which is right for you?

Our Customer Assistance Programs provide financial relief for income-qualified residential customers who are having difficulty paying their water and wastewater bill. Many options are available, and no one should have to choose between paying their water bill and other essential expenses. If you would like to discuss which options are right for you, please call our PGH₂O Cares team at [412-255-8800 x3170](tel:412-255-8800) or e-mail at cares@pgh2o.com.



Winter Shut Off Moratorium: December 1st through March 31st for customers who are at or below 300% of the Federal Poverty Level (FPL).

Bill Discount Program: 100% reduction of minimum monthly water and wastewater conveyance charges for customers who are at or below 150% of FPL. An additional 20% reduction of the cost of water used for customers with income levels less than or equal to 50% of FPL.

Hardship Grant Program: Cash grants up to \$300 per year for customers at or below 150% of FPL. The sincere effort of payment will continue to be waived through 2021.

Lead Service Line Reimbursement Program: We will assist customers with the cost of private lead service line replacement if customers choose to proactively hire a plumber and complete the work. For more information, visit lead.pgh2o.com/leadreimbursement.

People in Household	50% of FPL	150% of FPL	300% of FPL
1	\$6,440	\$19,320	\$38,640
2	\$8,710	\$26,130	\$52,260
3	\$10,980	\$32,940	\$65,880
4	\$13,250	\$39,750	\$79,500
5	\$15,520	\$46,560	\$93,120
6	\$17,790	\$53,370	\$106,740
7	\$20,060	\$60,180	\$120,360
8	\$22,330	\$66,990	\$133,980
For more than 8 people, add this amount for each additional person:	\$2,270	\$6,810	\$13,620



To learn more, please visit pgh2o.com/CAP or contact Dollar Energy Fund by calling **866-762-2348** to enroll.

Free translation services are available by calling **412-255-2423 (Press 5)**.

Penn Liberty Plaza I
1200 Penn Avenue
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info@pgh2o.com
T 412.255.2423
F 412.255.2475

www.pgh2o.com
@pgh2o
facebook.com/pgh2o

Customer Service/
Emergencies:
412.255.2423

PGH₂O Programas de ayuda al cliente

¿Cuál es el adecuado para usted?

Nuestros programas de ayuda para el cliente proporcionan un alivio financiero para los clientes residenciales que reúnen los requisitos por su ingreso que tienen dificultad para pagar la factura del agua y de las aguas residuales. Hay muchas opciones disponibles, y nadie deberá optar por pagar la factura del agua u otros gastos esenciales. Si quiere analizar cuáles son las opciones adecuadas para usted, llame a nuestro equipo de PGH₂O Cares al [412-255-8800](tel:412-255-8800), interno 3170 o envíe un correo electrónico a cares@pgh2o.com.



Moratoria por interrupción en el invierno: desde el 1.º de diciembre hasta el 31 de marzo para clientes que se encuentran en un 300 % del Nivel Federal de Pobreza (FPL) o por debajo de dicho porcentaje.

Programa de descuento de facturas: descuento del 100 % de los costos de transporte del agua y de aguas residuales mínimos mensuales para clientes que se encuentran en un 150 % del FPL o por debajo de dicho porcentaje. Un descuento del 20 % adicional del costo del agua utilizada por clientes con niveles de ingreso menores o iguales que el 50 % del FPL.

Programa de subsidio por dificultades extremas: subsidios en efectivo de hasta \$300 por año para los clientes que se encuentran en un FPL del 150 % o más bajo. El esfuerzo de pago sincero seguirá exento en 2021.

Programa de reembolso de la línea de servicio de plomo: ayudaremos a los clientes con el costo de reemplazo de la línea de servicio de tubería de plomo privada si los clientes eligen proactivamente contratar un plomero y completar el trabajo. Para obtener más información, visite lead.pgh2o.com/leadreimbursement.

Personas en el hogar	50 % del FPL	150 % del FPL	300 % del FPL
1	\$6,440	\$19,320	\$38,640
2	\$8,710	\$26,130	\$52,260
3	\$10,980	\$32,940	\$65,880
4	\$13,250	\$39,750	\$79,500
5	\$15,520	\$46,560	\$93,120
6	\$17,790	\$53,370	\$106,740
7	\$22,330	\$60,180	\$120,360
8	\$22,330	\$66,990	\$133,980
Para más de 8 personas, sume este monto para cada persona adicional:	\$2,270	\$6,810	\$13,620



Para obtener más información, visite pgh2o.com/CAP o comuníquese con Dollar Energy Fund llamando al 866-762-2348 para inscribirse.

Hay servicios de traducción gratuitos disponibles si llama al 412-255-2423 (presione 5).

Penn Liberty Plaza I
1200 Penn Avenue
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T 412.255.2423
F 412.255.2475

www.pgh2o.com

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Servicio al cliente/
emergencias:
412.255.2423

PWSA

Petition for Approval of
Pilot Private Service Line

Leak Repair

Exhibit C



PGH20 Cares, Program Enrollment, and Outreach

LIAAC Eleventh Meeting

May 14, 2021

PGH20 Cares

- **External Outreach**
- **Internal Training**
- **Manual Account Audit**
 - **Process**
 - **Discoveries**
 - **Outcome**
- **Confirmed Low Income**
- **High Consumption Audit**
 - **Leak Detection**
 - **Conservation**



External Outreach

- **February 25, 2021 – Representative Gainey Utility Forum on Facebook Live**
- **March 11, 2021 – PWSA Assistance Program Briefing (Districts 1, 6, 9 and OCA)**
- **March 19, 2021 – Additional PWSA Assistance Program Briefing**
- **March 24, 2021 – Pittsburgh Metropolitan Area Hispanic Chamber of Commerce**
- **March 26, 2021 – Zoom meeting with Dr. Marcela Gonzalez Rivas, Assistant Professor, Graduate School of Public and International Affairs University of Pittsburgh**
- **April 1, 2021 – Larimer Community Meeting**
- **April 20, 2021 – Low Income Household Water Assistance Program Information and Feedback Session**
- **April 28, 2021 – Civic Leadership Academy Spring Session**
- **May 3, 2021 – Pittsburgh Commission on Human Relations (PCHR)**
- **May 4, 2021 - Northeastern University Interview for NSF funded Research Project “Water Unaffordability in the United States”**
- **May 7, 2021 – Northeastern University Interview for NSF funded Research Project “Water Unaffordability in the United States”**

Internal Training



- February 23, 2021 – Dollar Energy Fund Introductory Meeting
- March 1, 2021 – Website Content
- March 5, 2021 – DEF Reporting Requirements
- March 12, 2021 – DEF OSCAR Enrollment and Training
- March 22, 2021 – DEF Account Audits
- March 31, 2021 – Outbound Enrollment Calls
- April 12, 2021 – DEF Account Audit Follow-Up
- April 21, 22, 23 – Internal Customer Service Customer Assistance Program Training and Open Forum

Manual Account Audit Process

- **Bill Discount Program Enrollment:**
- **Manually reviewed 1,172 account discrepancies identified through DEF and PWSA enrollment data**
- **114 accounts identified as eligible per DEF, but were not actively enrolled in PWSA's billing system**
- **85 accounts enrolled in PWSA's billing system, but not eligible per DEF**
- **200 accounts identified to be removed from the BDP due to ownership/resident change**
- **571 accounts were dismissed per DEF, but still enrolled in PWSA's billing system**
- **34 accounts were identified as "Over Income" per DEF, but PWSA determined that was inaccurate based on the reported FPL**
- **202 applicants were determined to be "Not a PWSA Customer" per DEF, but PWSA determined that was inaccurate based on account records**

Manual Account Audit Process (continued)

- **Payment Arrangements:**
- **Manually reviewed 3,571 payment arrangements**
- **About 2,000 account locks were removed**
- **Removed for arrangements that were severely delinquent, paid in full, or expired**
- **Customers can establish at least one additional payment arrangement per the Joint Petition for Settlement III.D.3(a) and the Termination of Moratorium Order docketed as M-2020-3019244**

Manual Account Audit Discoveries

- **Errors/Discrepancies Identified:**
- **Inaccurate Dismissal Codes**
- **Eligibility coding errors with BDP and Winter Moratorium**
- **Unexplained Gaps in Enrollment**
- **Incorrect Account Numbers**
- **Recertification Letters Not Being Issued**
- **Inaccurate Ineligibility Determinations**
- **Lack of Cross Enrollment/Program Education**
- **PWSA was not unenrolling accounts that did not recertify or for accounts where the tenant vacated**
- **PWSA was not previously notifying DEF to update OSCAR records**

Manual Account Audit Outcomes



CARES TEAM HAS OSCAR ACCESS AND MANUALLY CHECKS EACH ACCOUNT TO CONFIRM THE ACCURACY OF DEF RECORDS



IDENTIFIED ERRORS ARE SUBMITTED DIRECTLY TO DEF TO BE CORRECTED



CARES TEAM PERSONALLY CONTACTS APPLICANTS TO ENSURE VALID ENROLLMENT AND UPDATES OSCAR AS NEEDED



CARES TEAM NOW MANUALLY REVIEWS EACH ACCOUNT REPORTED BY DEF TO CONFIRM THE ACCURACY OF THE REPORTED INFORMATION AND TO MANUALLY TRACK DATA TO COMPLY WITH REPORTING REQUIREMENTS

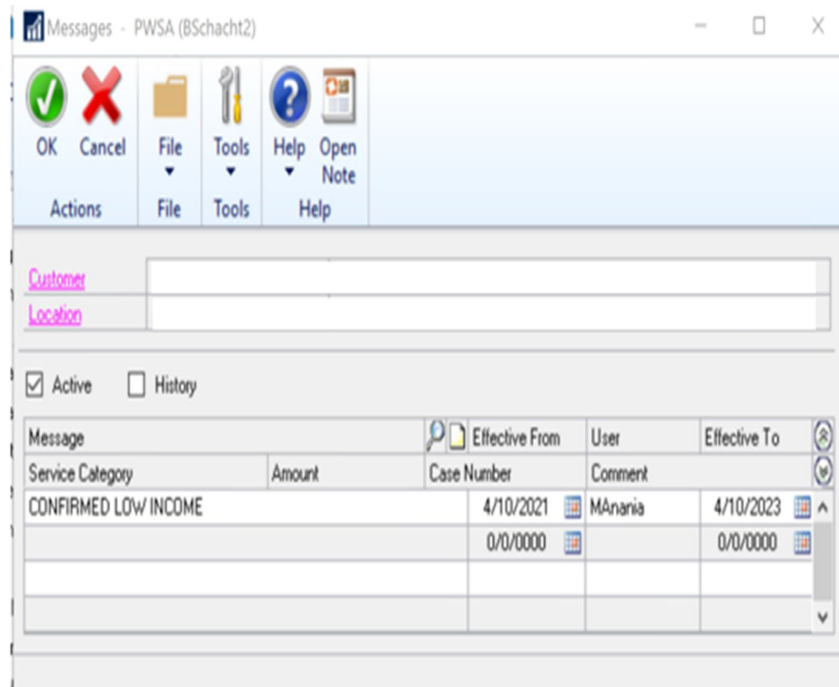


EVERY FRIDAY, THE CARES TEAM MANUALLY REVIEWS EACH ACCOUNT ON THE DEF "INELIGIBILITY REPORT" TO CONFIRM THE ACCURACY OF THE INELIGIBLE STATUS



IF ERRORS ARE FOUND, THE ACCOUNT IS SUBMITTED TO DEF AND/OR THE CARES TEAM CONTACTS THE CUSTOMER AND UPDATES OSCAR

Confirmed Low Income



- A “Confirmed Low Income Customer” identifier was created using a unique account message for tracking and notification purposes as described in Joint Petition for Settlement III.F.1
- This message automatically alerts anyone that accesses the account of the “confirmed low income” classification
- PWSA Representatives add this message to the account when:
 - A 60-month payment arrangement is established
 - A customer qualifies for any of PWSA’s low income assistance programs
 - PWSA receives notification that the customer has qualified for ALCOSAN’s Clean Water Assistance Fund grant
 - Any other circumstances, including self-disclosure of income level, which makes it reasonably likely that the customer is low income

High Consumption Audit

- **The Cares team manually reviewed a pre-bill editing report to locate customers who experienced high consumption in 2020 and potentially had not been given all the options available to them at that time.**
- **19 accounts identified**
- **Cares Representatives contacted each customer to discuss their accounts. This was an extremely labor-intensive process that often involved:**
 - **Scheduling service appointments**
 - **Water consumption counseling including Customer Usage Portal enrollment**
 - **BDP recertification**
 - **Interest removal**
 - **Payment arrangement enrollment**
 - **ALCOSAN referrals**
 - **Follow-up communication**



High Consumption Audit

- Customers at 200% of their previous consumption and who are enrolled in the BDP are identified during the pre-bill editing process.



explained Usage Portal and Scheduled meter update w/customer for Friday 4/30/2021 8am to Noon - please call [redacted] en route Thank you! SV

Sarah Visznecki

4/27/2021 4:26 PM  

HC + CAP Rate Investigation:

called and s/w [redacted] he explained that he replaced his toilet two times using used toilets but the leak persisted but now he replaced with a new toilet and consumption has gone down - he explained that he had a laundry machine in house but it broke a few months ago he admitted to currently letting water run while doing dishes would could explain him being on the higher end of normal for one person explained additional programs available CWF, Hardship grant, arrearage forgiveness, new federal gov aid - will email of this info w/spa letter to [redacted]

ENROLLED IN 60 MONTH ARRANGEMENT 1 ADULT/1,500 wages = CAP eligible = \$119.38 + cmc due by due date listed on each bill, first payment is installment amount only due 5/5/2021 renewed enrollment via OSCAR - SENDING LEAK CREDIT INFO INCLUDING HC HISTORY added CLI lock 5 year expiration

Will you please have the interest from 2/11/2021 to 4/14/2021 credited to the account (6177 05) The customer is requesting to have this due to the credit history on his

Program Enrollment

- **Tracking and Reporting**
- **Confirmed Low Income**
- **60-Month Payment Arrangements**
- **Bill Discount Program Applicants**
- **Bill Discount Program Participants**
- **Hardship Grant**
- **Moving Forward**

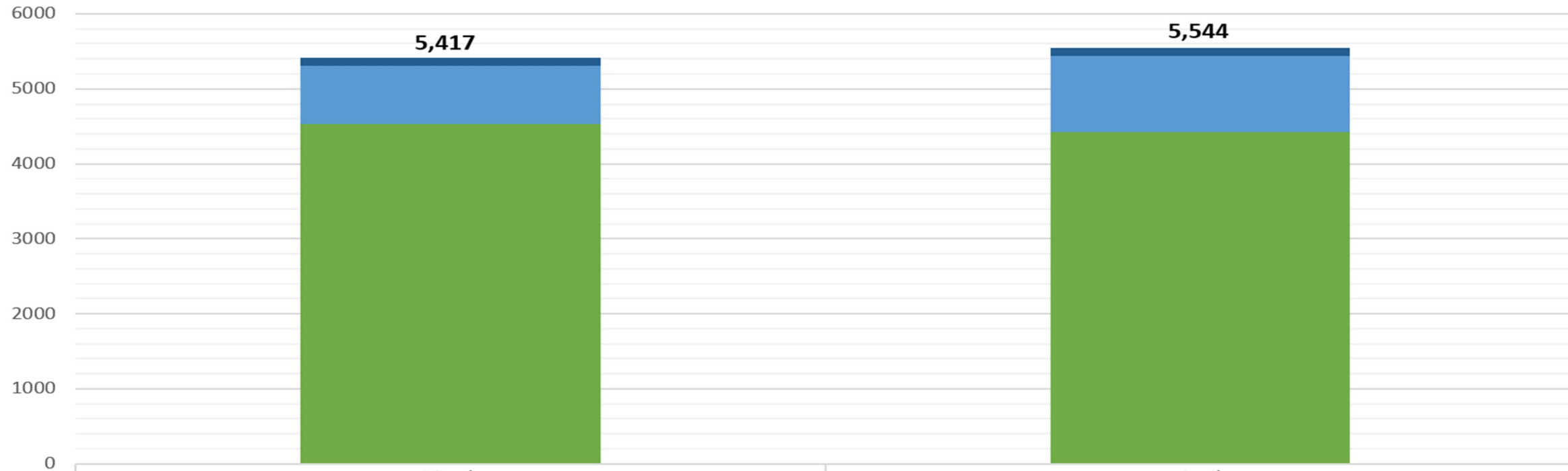


Tracking and Reporting

- **Reports have been created for:**
 - **60-month payment arrangements**
 - **BDP Enrollment**
 - **Forgiveness Arrearage**
 - **Hardship Grant**

- **PWSA is working to create a GIS layer that will serve as a tool to map confirmed low income accounts by neighborhood**
- **Manually reviewing DEF reports daily and weekly**
- **Identifying cross enrollment opportunities and individually contacting customers**
- **Tracking outreach and communication efforts**

Confirmed Low Income Customers



■ ALCOSAN Grant

■ Hardship Grant

■ LRRP

■ PAR

■ Bill Discount

March

105

2

3

777

4530

April

102

4

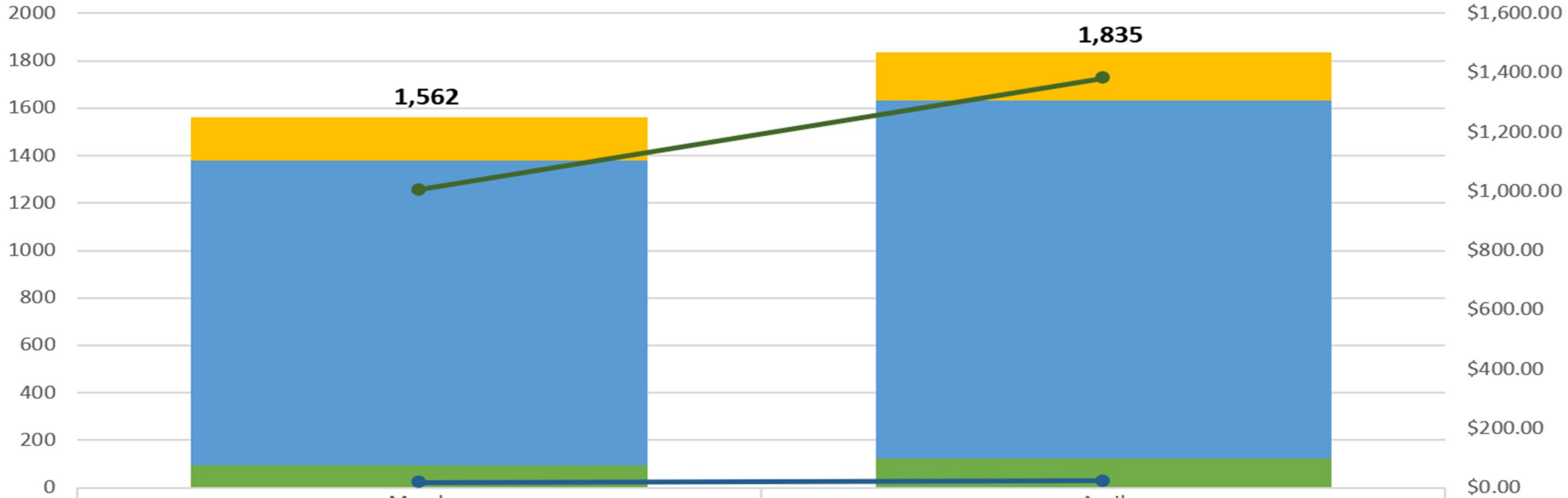
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Confirmed Low Income

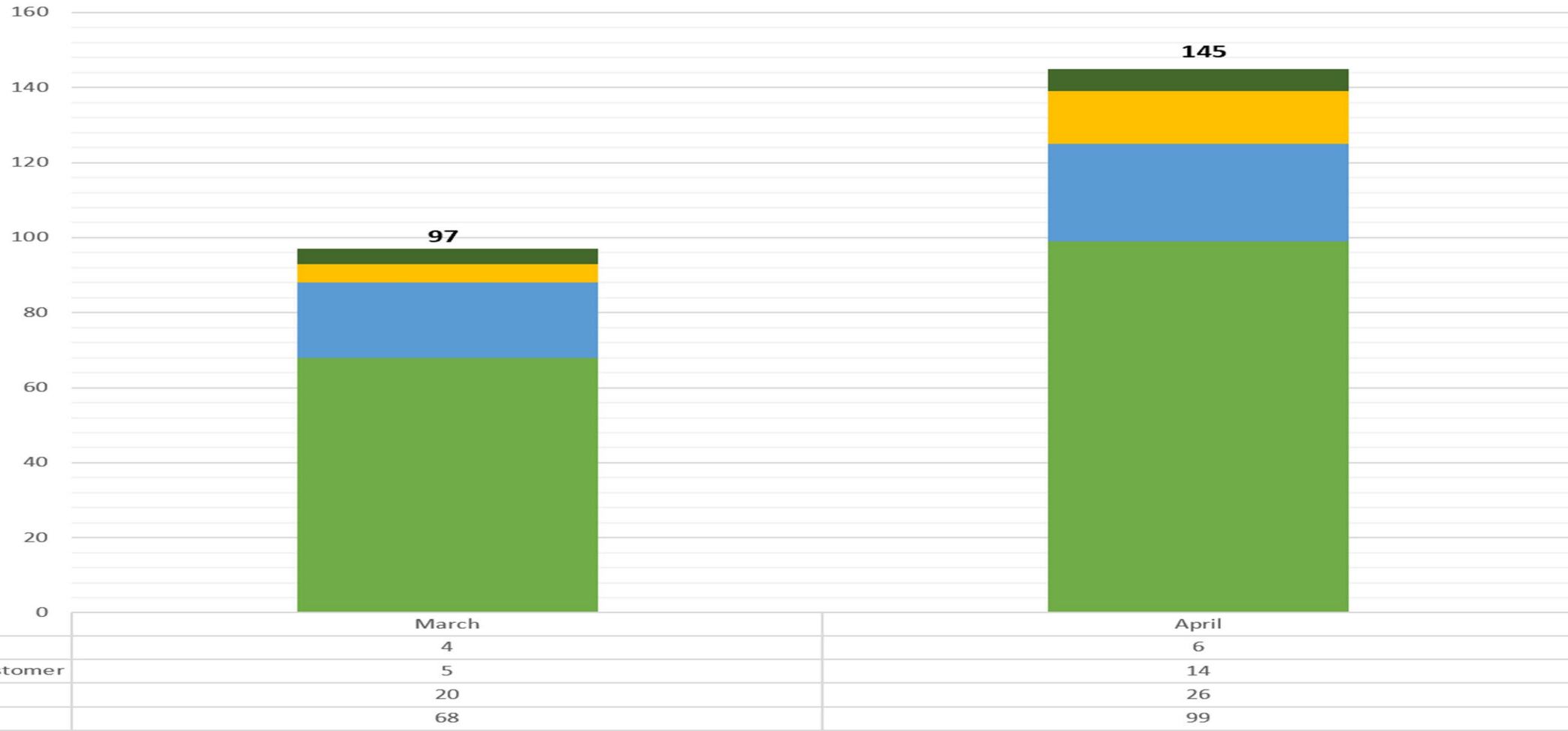
60-Month Payment Arrangements



	March	April
PAR >150%	183	201
PAR < 150%	1286	1512
PAR + Forgiveness Credit	93	122
Average Balance	\$1,004.83	1382.3
Average Monthly PAR	\$16.89	23.16

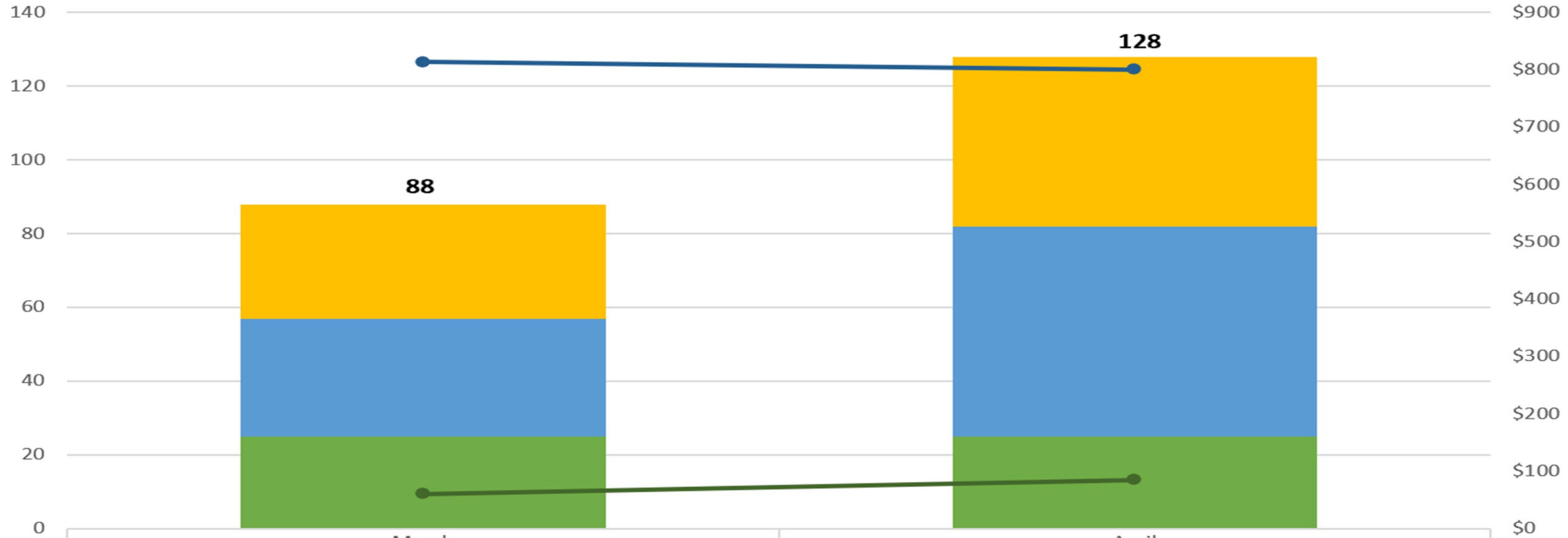
60-Month Payment Arrangements

Bill Discount Program Applicants



Bill Discount Program Applicants

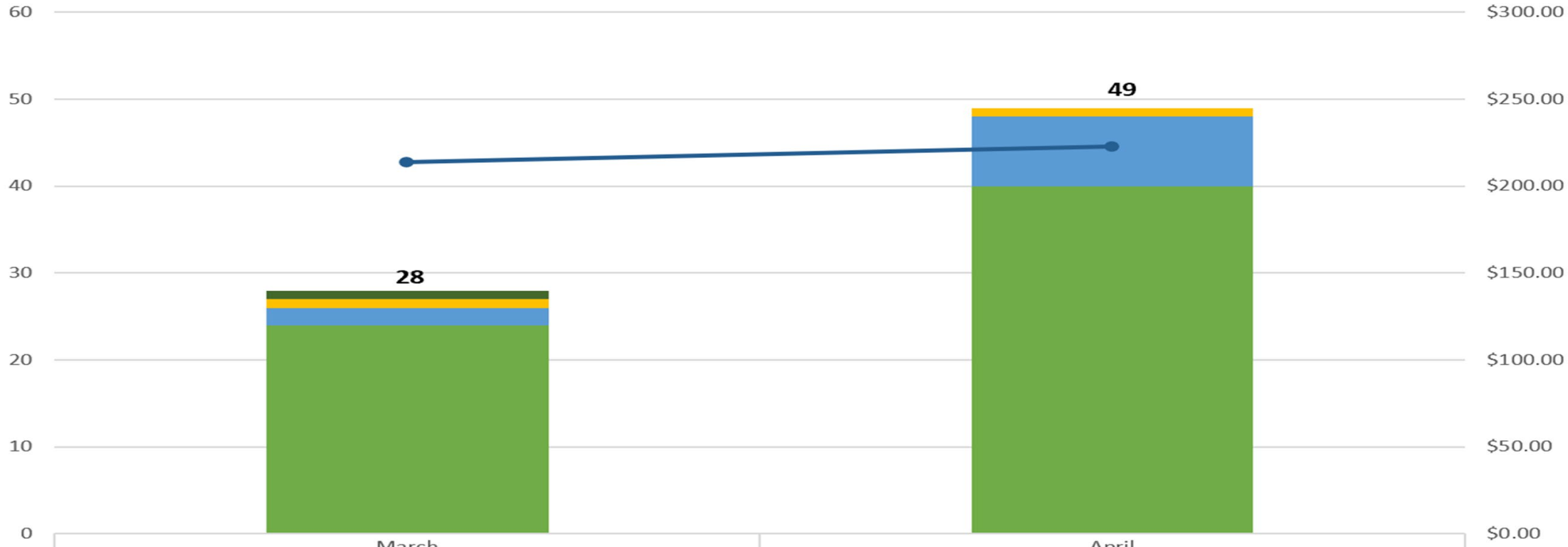
Bill Discount Program Participants



	March	April
100.01%-150% FPL	31	46
50.01%-100% FPL	32	57
0%-50% FPL	25	25
Average Balance	\$753.73	\$715.61
Entering with Balances	60	85

Bill Discount Program Participants

Hardship Grant



	March	April
Denied-Over Income	1	0
Denied-No Balance	1	1
Denied-Sewer Only	2	8
Approved	24	40
Average Grant	\$213.68	\$222.65

Hardship Grant

Moving Forward

The PGH20 Cares Team will:

- Continue to review accounts identified during the initial account audit
- Manually review records received from DEF regarding enrollment accuracy
- Contact tenants via the edited Owner/Tenant form to provide tenants with the option to have a PGH20 Cares team member contact them regarding program enrollment
- Continue to attend community meetings



pgh2ocares@pgh2o.com
412-255-8800 ext. 8512

Outreach

- **Customer Outreach**
 - February through April 2021
 - Print and Online
- **Customer Assistance Ad Campaigns**
 - Post-Gazette Email
 - Google Ad Keywords
 - Campaign Take-aways



Customer Outreach

- **Bill Inserts and Newsletters (monthly):**
 - **111,000 bill inserts**
 - **Currents newsletter**
 - **Mayor's Office Community Affairs newsletter**
- **Press Releases: When you need a helping hand, call on PGH20 Cares (March 25, 2021)**



Customer Outreach (continued)

CAP Flyers and Rate Brochure translated into Chinese, Spanish, and Tigrinya

4,600 English flyers distributed and 3,800 Spanish (100 of each sent to all Carnegie Library locations for posting and distribution)

E-mail sent to 42 local organizations offering to deliver flyers

All flyers on website for easy access

25 Facebook posts/237 engagements

27 Tweets/107,588 impressions

CAP e-mail blast sent to community groups and elected officials with CAP changes, new flyers and announcing PGH20 Cares

City Council Education Sessions: Presentation on updated programs and PGH20 Cares

Customer Assistance PG Email Campaign

- **Post-Gazette Email Campaign**
- **Campaign will run for 3 months (issued on March 25th, April 30th, and scheduled for May 20th)**
- **Targeted ads based on zip codes and income level of \$50,000 or less**

	March 25	April 30	May 20
Total Email Addresses	29,201	29,201	
Open Rate	18.36% (5,360)	15.49% (4,495)	
Click Rate	1.67% (489)	1.62% (471)	

Customer Assistance Google Ad Campaign

- The Google Ad campaign launched on March 23, 2021
- Google ad will display when specific demographics and keywords are typed in (zip codes and keywords)
- Ad Results:
 - Impressions – 9,250 (the number of people who saw the ad)
 - Clicks – 2,570 (the number of people who clicked on it)
 - Phone Calls – 390 (the number of people who called PWSA for more information or to enroll)

Ad · www.pgh2o.com/ (412) 255-2423

Reduce Your Water & Sewer Bill | Customer Assistance Available |
Call PWSA to Enroll Today

We all need help sometimes. Call PWSA today to discuss our Customer Assistance Programs. Many options are available to help income-qualified residential customers. Call today.

Email and Ad Campaign Take-aways

- The analytics show that these email and ad campaigns help to build awareness and drive interest in PWSA's customer assistance programs.

➤ Increased Web Traffic:

- Total Page Views – 4,687
 - Organic Traffic – 1,753 (Visitors coming to page on their own)
 - Paid Traffic – 2,002 (Visitors coming to page after seeing the ad)
- ## ➤ Increased calls to Customer Service:
- As of May 5th, Google Ad Campaign tracked 390 calls to Customer Service



During this difficult time, no one should have to choose between paying their water bill and other essential expenses. To help those who need it most, the Pittsburgh Water and Sewer Authority offers several customer assistance programs to income-qualified customers.



Find out if you qualify!

1. Visit our website at pgh2o.com/CAP
2. For more information, contact the PGH2O Cares Team by calling **(412) 255-2423** or emailing pgh2oCares@pgh2o.com
3. To enroll in customer assistance programs, please call Dollar Energy Fund **(866) 762-2348**

Program Highlights — Which one is right for you?

We offer a variety of programs to assist customers with different needs. Depending on your circumstance, one of these programs may provide the help you need:

- **Bill Discount Program:** Provides a discount of \$35.78 – a 100% discount on the first 1,000 gallons of fixed water charges. An additional 20% reduction on water usage is also available for our most vulnerable customers enrolled in the program. Additionally, customers who are approved for the Bill Discount Program and are enrolled in an active payment plan with PWSA are eligible to receive a \$15 reduction of their past due balance for every on-time monthly payment. This equals a monthly discount of \$50.78.
- **Hardship Grant Program:** Cash grants, up to \$300 per year, are available through our Hardship Grant Program for water customers at or below 150% FPL. Our average household grant is approximately \$285 and since 2018 we have helped more than 370 Pittsburgh households maintain water service.
- **Flexible Payment Plans:** We are offering payment plans to help customers at all income levels. Regardless of your income, you can be placed on a payment plan making it possible to pay your balance over time without accruing interest or paying additional fees.

Call **(412) 255-2423** or email pgh2oCares@pgh2o.com today!



Free translation services are available by calling **(412) 255-2423 (press 5)** and our customer assistance flyer is available in multiple languages at pgh2o.com/CAP



Thank you

Questions or comments about the LIAAC presentation, please contact Julie Quigley at jquigley@pgh2o.com



PWSA

Petition for Approval of
Pilot Private Service Line

Leak Repair

Exhibit D



PGH20 Cares, Program Enrollment, and Outreach

LIAAC Twelfth Meeting

September 17, 2021

PGH20 Cares

- **Community Outreach**
- **Internal Training**
- **High Consumption Audit**
 - **Leak Detection**
 - **7 Step Process**





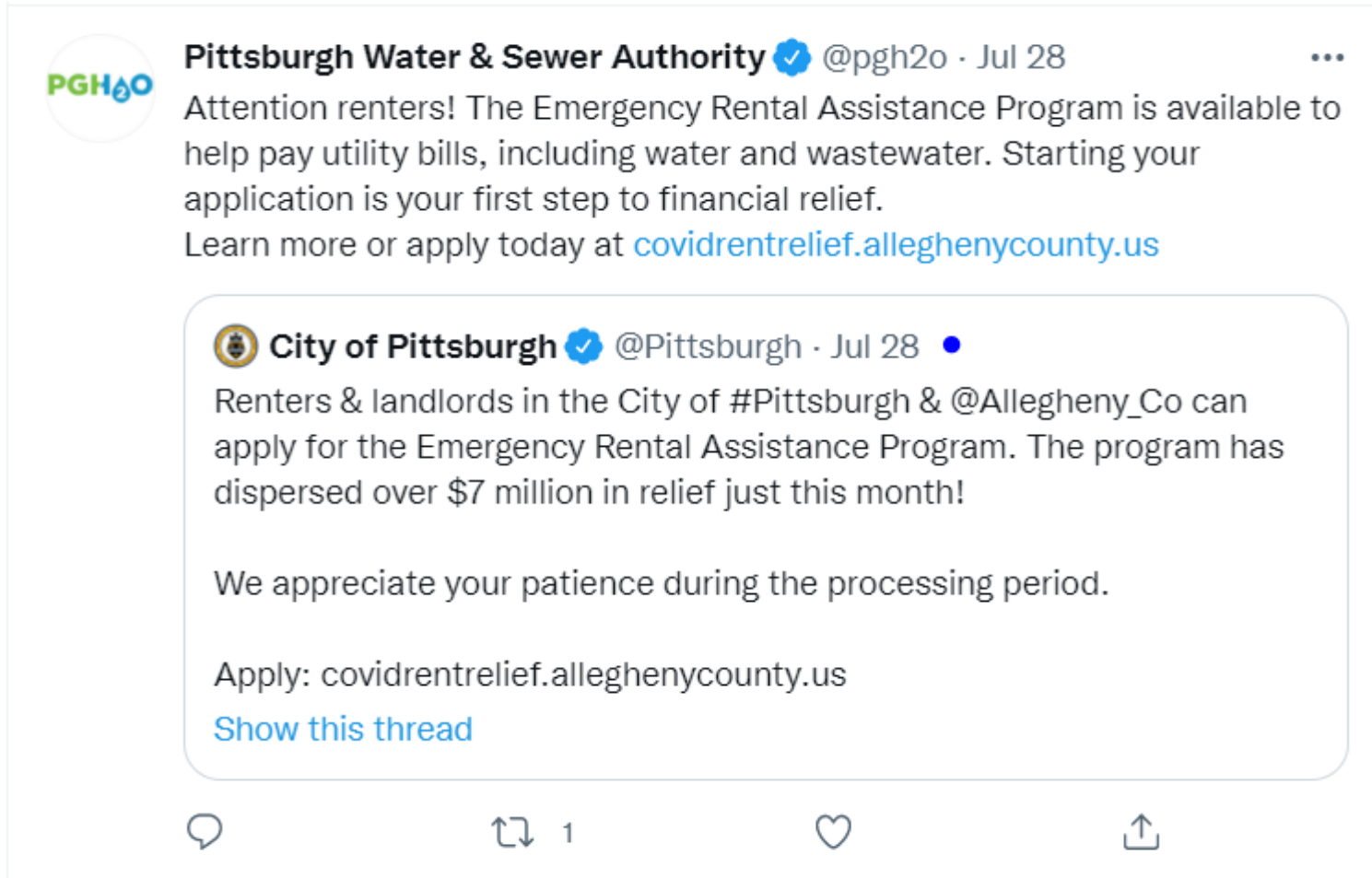
Community Outreach


Community Meetings and Events




5/3/2021	Pittsburgh Commission on Human Relations
5/4 and 5/7/2021	Northeastern University Interview for Water Unaffordability in the U.S.
5/25/2021	Oakland Planning and Development Corporation (OPDC)
5/28/2021	Casa San Jose
6/18/2021	Greater Hazelwood Community Council
6/22/2021	Perry Hilltop Citizens' Council
6/28/2021	PUC Public Input Hearings
6/29/2021	PUC Public Input Hearings
6/30/2021	PUC Public Input Hearings
7/10/2021	Hazelwood Wellness Event
7/13/2021	Hazelwood Initiative (monthly meeting)
7/13/2021	31st Ward Community Action Group
7/20/2021	LIAAC Member Collaboration: Reaching non-English speaking customers
7/22/2021	AAA Community Agency Meeting
7/24/2021	Summer Time Bike Drive
8/14/2021	Homewood Community Health & Wellness Summit
8/22/2021	7th Annual Community Day - The Back Pack Hero
8/28/2021	Books and Beats Brighton Heights - Northside Leadership Conference
8/28/2021	Homewood Food Give Away
8/30/2021	Welcoming Pittsburgh: Meeting to strategize future outreach opportunities

Internal Training



Pittsburgh Water & Sewer Authority  @pgh2o · Jul 28

Attention renters! The Emergency Rental Assistance Program is available to help pay utility bills, including water and wastewater. Starting your application is your first step to financial relief. Learn more or apply today at covidrentrelief.alleghenycounty.us

City of Pittsburgh  @Pittsburgh · Jul 28

Renters & landlords in the City of #Pittsburgh & @Allegheny_Co can apply for the Emergency Rental Assistance Program. The program has dispersed over \$7 million in relief just this month!

We appreciate your patience during the processing period.

Apply: covidrentrelief.alleghenycounty.us

[Show this thread](#)

1

- July 28, 2021 – PWSA promoted Rental Assistance Awareness Day to remind staff to engage renters and landlords in ERAP at every opportunity
- NACWA Webinar: Navigating New Funding Opportunities for Low-Income Water Customer Assistance
- AAA Community Agency Meeting

High Consumption Audit

➤ In Q2 2021, the Cares team reached out to 19 low-income customers who were identified as having experienced high consumption in 2020 via a manual review of a pre-bill report.

➤ Customers = BDP customers

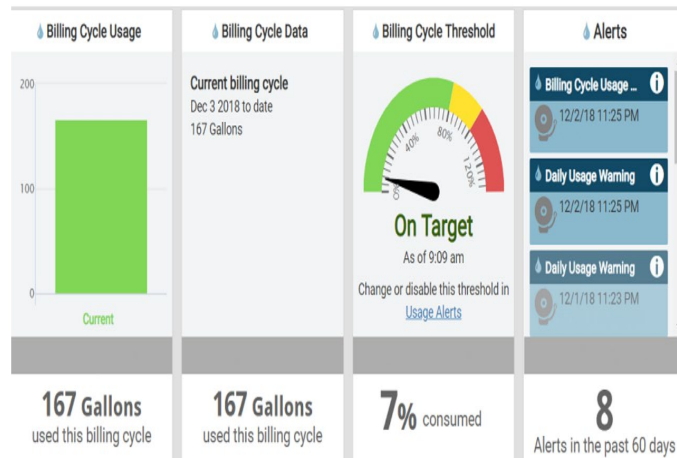
➤ High consumption = an increase of 200% or more as compared to the previous monthly usage

➤ 106 accounts have been addressed as of August 31, 2021

➤ This is an extremely labor-intensive process often involving; 1) service visit scheduling, 2) Customer Usage Portal enrollment, 3) consumption counseling, 4) interest removal, 5) payment plan enrollment, 6) ALCOSAN leak credit referrals, and 7) follow-up.

Check Your Water Usage

Our [Customer Usage Portal](#) is a free tool that helps customers track their real-time water usage and receive alerts when there is a spike in water usage. Setting usage alerts can help you detect costly water leaks in your property.



Michael Anania 8/9/2021 9:46 AM

CALLER (OWNER) AND ADVISED OF H.C. OF 14T GALLONS. SHE THOUGHT IT WAS HER TOILET BUT STATED SHE DIDN'T THINK IT WAS LEAKING ANYMORE. ADVISED HER OF ALCOSAN LEAK PROCEDURE AND CUSTOMER PORTAL. WILL EMAIL HER THAT INFORMATION.

Program Enrollment

- **Tracking and Reporting**
- **Confirmed Low Income**
- **60-Month Payment Arrangements**
- **Bill Discount Program Applicants**
- **Bill Discount Program Participants**
- **Hardship Grant**
- **Moving Forward**

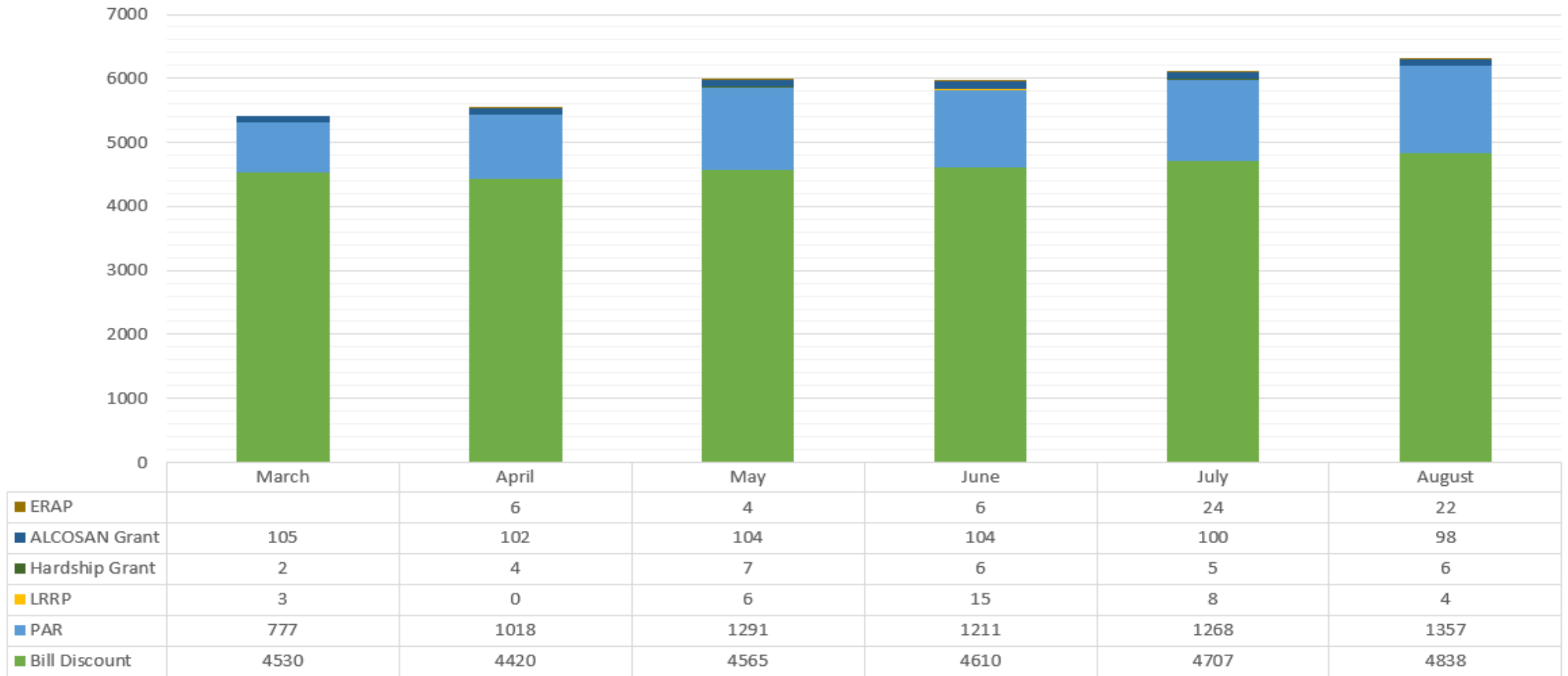


Tracking and Reporting



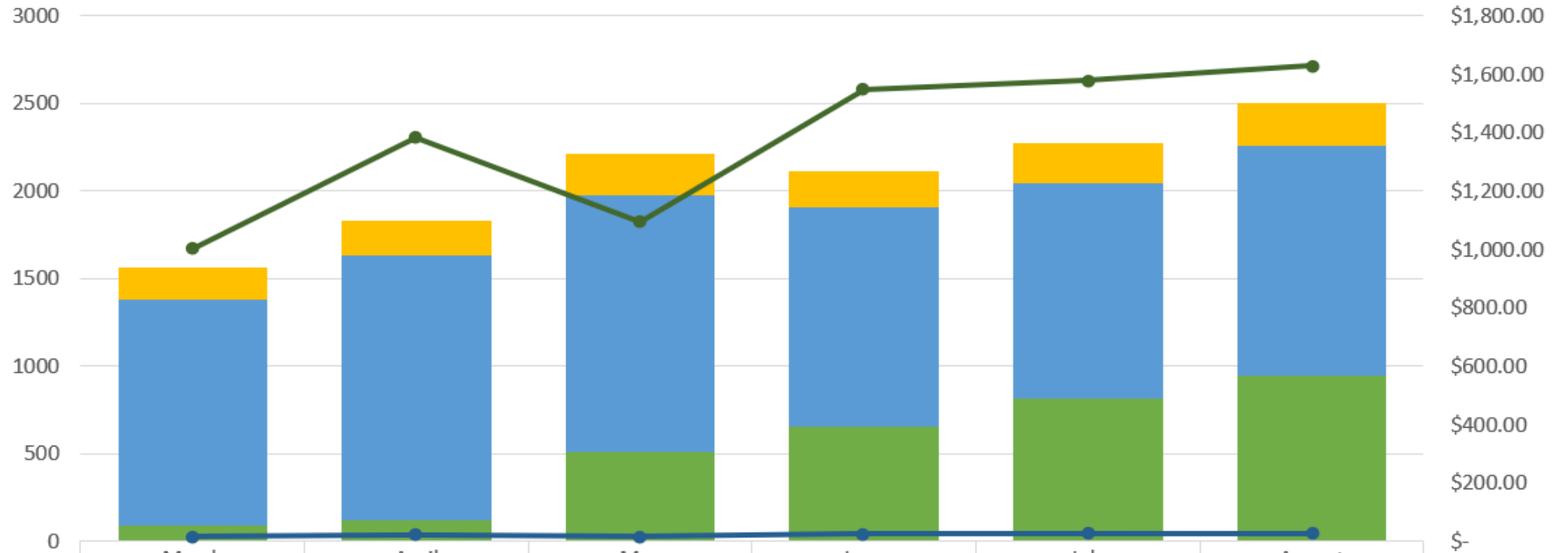
- Cares continues to generate reports of: 60-month payment arrangements, BDP Enrollments, Arrearage Forgiveness, and Hardship Grants.
 - Cares is cold calling those enrolled in 60-month payment arrangements who are not in the BDP.
 - Accounts reviewed: 108
 - BDP Enrollments during first contact: 18 (~17%)
- PWSA continues to work to create a GIS layer that will serve as a tool to map confirmed low-income accounts.
 - Cares is utilizing Raftelis data to identify accounts for engagement.
 - Accounts reviewed: 193
 - BDP Enrollments during first contact: 39 (~20%)
- Manually reviewing DEF reports weekly and monthly
- Tracking outreach and communication efforts

Confirmed Low Income Customers



Confirmed Low Income

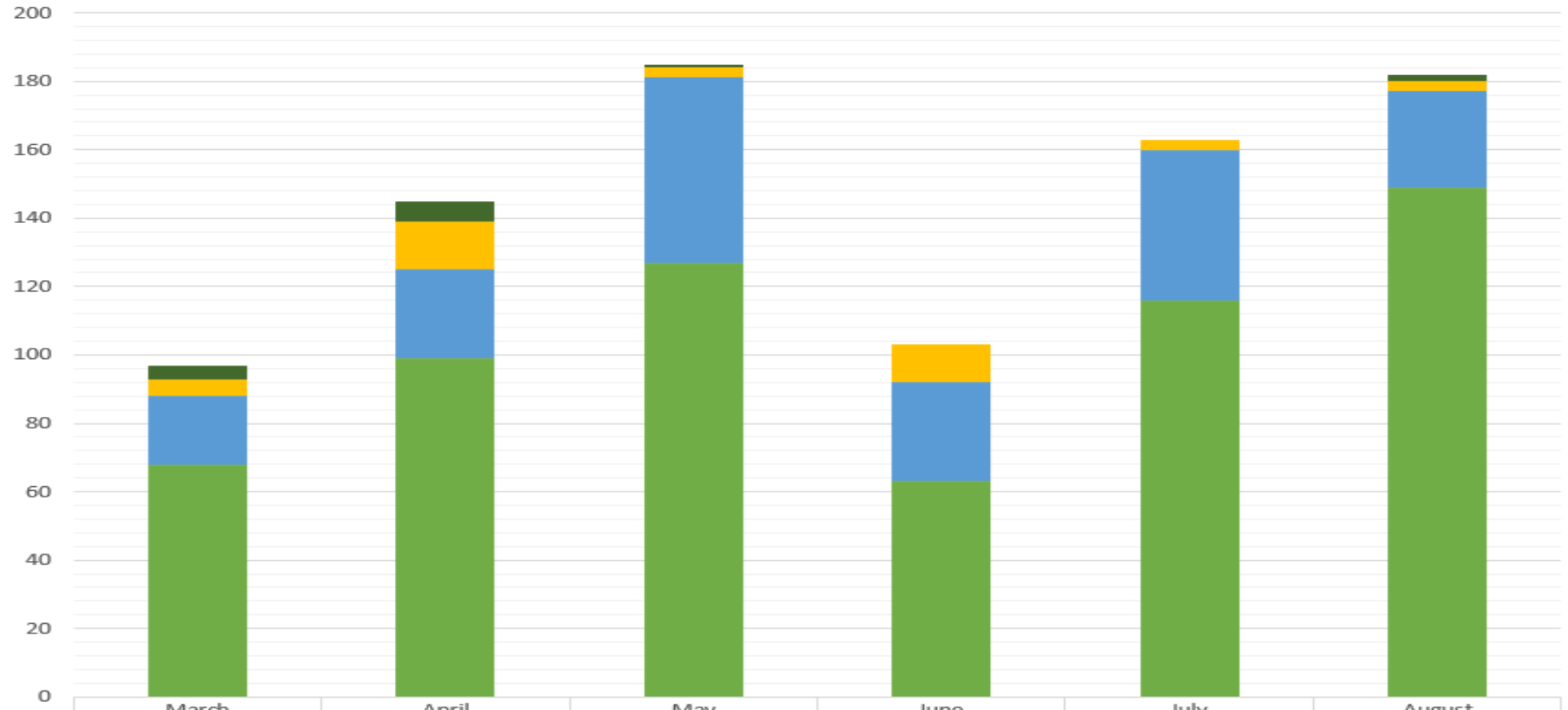
60-Month Payment Arrangements



■ PAR >150%	183	201	240	201	225	244
■ PAR < 150%	1286	1512	1465	1252	1234	1310
■ PAR + Forgiveness Credit	93	122	509	658	813	948
—●— Average Balance	\$1,004.83	\$1,382.30	\$1,095.84	\$1,547.14	\$1,579.14	\$1,632.57
—●— Average Monthly PAR	\$16.89	\$23.16	\$18.39	\$25.84	\$26.37	\$27.26

60-Month Payment Arrangements

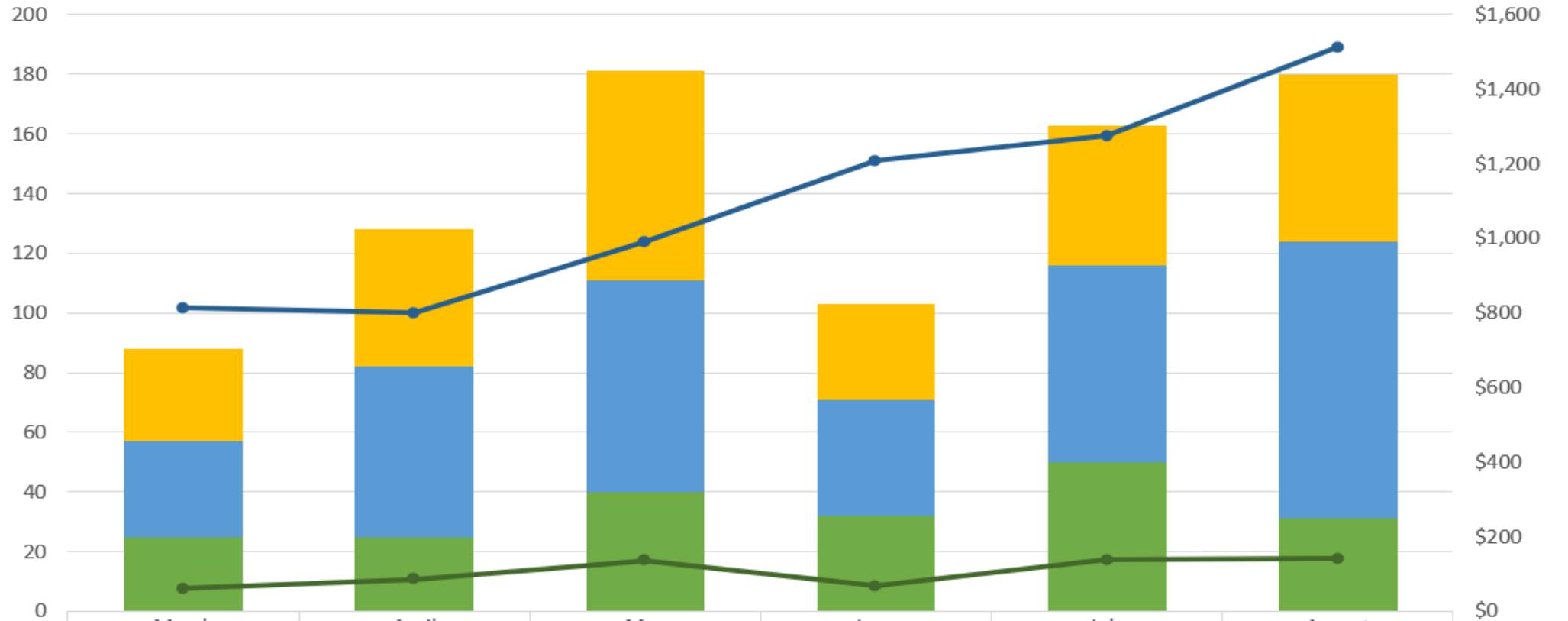
Bill Discount Program Applicants



	March	April	May	June	July	August
Ineligible - Over Income	4	6	1	0	0	2
Ineligible - Not a PWSA Customer	5	14	3	11	3	3
Recertified	20	26	54	29	44	28
New Enrollment	68	99	127	63	116	149

Bill Discount Program Applicants

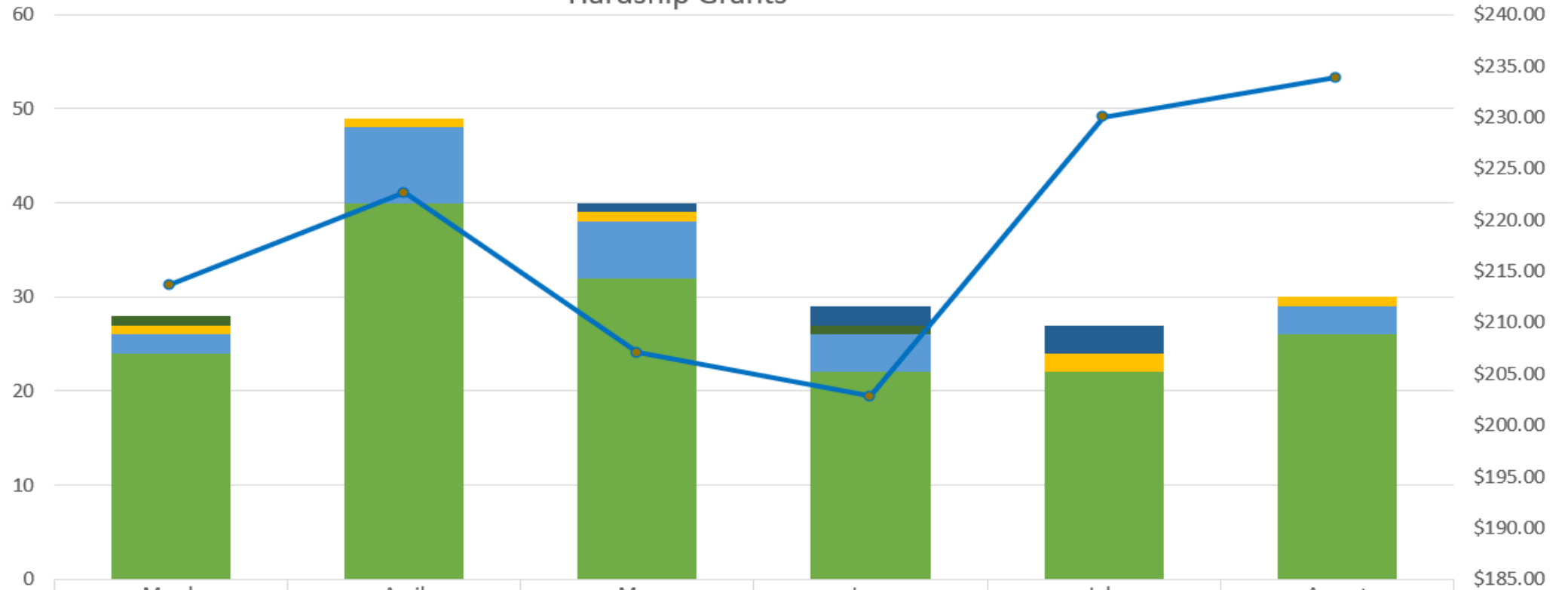
Bill Discount Program Participants



	March	April	May	June	July	August
100.01%-150% FPL	31	46	70	32	47	56
50.01%-100% FPL	32	57	71	39	66	93
0%-50% FPL	25	25	40	32	50	31
Average Balance	\$753.73	\$715.61	\$856.11	\$1,139.14	\$1,137.29	\$1,372.49
Entering with Balances	60	85	135	68	138	141

Bill Discount Program Participants

Hardship Grants



	March	April	May	June	July	August
Denied-Other	0	0	1	2	3	0
Denied-Over Income	1	0	0	1	0	0
Denied-No Balance	1	1	1	0	2	1
Denied-Sewer Only	2	8	6	4	0	3
Approved	24	40	32	22	22	26
Average Grant	\$213.68	\$222.65	\$207.05	202.83	\$230.00	\$233.83

Hardship Grant

Moving Forward

- Continue to review accounts identified during the initial account audit and manually review DEF records
- Contact tenants via the edited Owner/Tenant form
- Continue to attend community meetings
- Cold call by census tract and 60-month payment plans with no BDP enrollment
- Receive call transfers/direct calls to 3107
 - As of 9/1/21, 112 Contact Center transfers
- Begin door to door canvassing (on hold for now due to COVID-19)



NEW!

cares@pgh2o.com

412-255-8800 ext. 3107

Outreach

- **Customer Outreach**
 - May through August 2021
 - Print and Online
- **Customer Assistance Ad Campaigns**
 - Post-Gazette Email
 - Google Ad Keywords
 - Campaign Take-aways



Customer Outreach

- **Bill Inserts and Newsletters (monthly):**
 - 111,000 bill inserts
 - Currents newsletter
 - Mayor's Office Community Affairs newsletter
- **Press Releases: *Attention Renters! Assistance Available for Water and Wastewater Payments* (May 6, 2021)**





Customer Outreach (continued)

Met with Welcoming Pittsburgh on 8/30/21 to collaborate on outreach to non-English speaking communities. Cares will present at their virtual call on 9/8/21.

PGH20 Cares attended 14 Public community meetings/events for CAP outreach and enrollment.

19 Facebook posts/17 engagements (reactions, comments, shares)/5,200 reach

21 Tweets/56,278 impressions

Public Source published two articles featuring our Customer Assistance Programs.

Customer Assistance PG Email Campaign

- **Post-Gazette Email Campaign**
- Campaign ran for 3 months (issued on March 25th, April 30th, and scheduled for May 20th)
- Targeted ads based on zip codes and income level of \$50,000 or less

	March 25	April 30	May 20
Total Email Addresses	29,201	29,201	29,381
Open Rate	18.36% (5,360)	15.49% (4,495)	20.63% (6,061)
Click Rate	1.67% (489)	1.62% (471)	2.33% (685)

Customer Assistance Google Ad Campaign

- First Launched: March 22nd through May 23rd
- Campaign continued on and off throughout the summer.
 - June 11th – July 23rd
 - Restarted August 27th
- Google ad displays when specific demographics and keywords are entered.
- **Ad Results:**
 - Impressions – 28,400 (the number of people who saw ad)
 - Clicks – 8,700 (the number of people who clicked on it)
 - Phone Calls – 1,410 (the number of people who called PWSA for more information or to enroll)

Ad • www.pgh2o.com/ (412) 255-2423

**Reduce Your Water & Sewer Bill | Customer Assistance Available |
Call PWSA to Enroll Today**

We all need help sometimes. Call PWSA today to discuss our Customer Assistance Programs. Many options are available to help income-qualified residential customers. Call today.

Ad Campaign Continues to Build Awareness, Generate Interest

- **Increased Web Traffic:**
 - Total Page Views – 14,030
 - Organic Traffic – 3,822 (Visitors coming to page on their own)
 - Paid Traffic – 8,210 (Visitors coming to page after seeing ad)
- **Increased calls to Customer Service:**
 - As of September 1, Google Ad Campaign tracked 1,410 calls to Customer Service since initiating the campaign.



During this difficult time, no one should have to choose between paying their water bill and other essential expenses. To help those who need it most, the Pittsburgh Water and Sewer Authority offers several customer assistance programs to income-qualified customers.



Find out if you qualify!

1. Visit our website at pgh2o.com/CAP
2. For more information, contact the PGH2O Cares Team by calling (412) 255-2423 or emailing pgh2oCares@pgh2o.com
3. To enroll in customer assistance programs, please call Dollar Energy Fund (866) 762-2348

Program Highlights — Which one is right for you?

We offer a variety of programs to assist customers with different needs. Depending on your circumstance, one of these programs may provide the help you need:

- **Bill Discount Program:** Provides a discount of \$35.78 – a 100% discount on the first 1,000 gallons of fixed water charges. An additional 20% reduction on water usage is also available for our most vulnerable customers enrolled in the program. Additionally, customers who are approved for the Bill Discount Program and are enrolled in an active payment plan with PWSA are eligible to receive a \$15 reduction of their past due balance for every on-time monthly payment. This equals a monthly discount of \$50.78.
- **Hardship Grant Program:** Cash grants, up to \$300 per year, are available through our Hardship Grant Program for water customers at or below 150% FPL. Our average household grant is approximately \$285 and since 2018 we have helped more than 370 Pittsburgh households maintain water service.
- **Flexible Payment Plans:** We are offering payment plans to help customers at all income levels. Regardless of your income, you can be placed on a payment plan making it possible to pay your balance over time without accruing interest or paying additional fees.



Thank you

Questions or comments about the LIAAC presentation, please contact Julie Quigley at jquigley@pgh2o.com



PWSA

Petition for Approval of
Pilot Private Service Line

Leak Repair

Exhibit E



PGH20 Cares, Program Enrollment, and Outreach

LIAAC Thirteenth Meeting

November 19, 2021

PGH20 Cares

- **Community Outreach**
- **High Consumption Audit**
 - **Leak Detection**
 - **7 Step Process**





Community Outreach

Community Meetings and Events



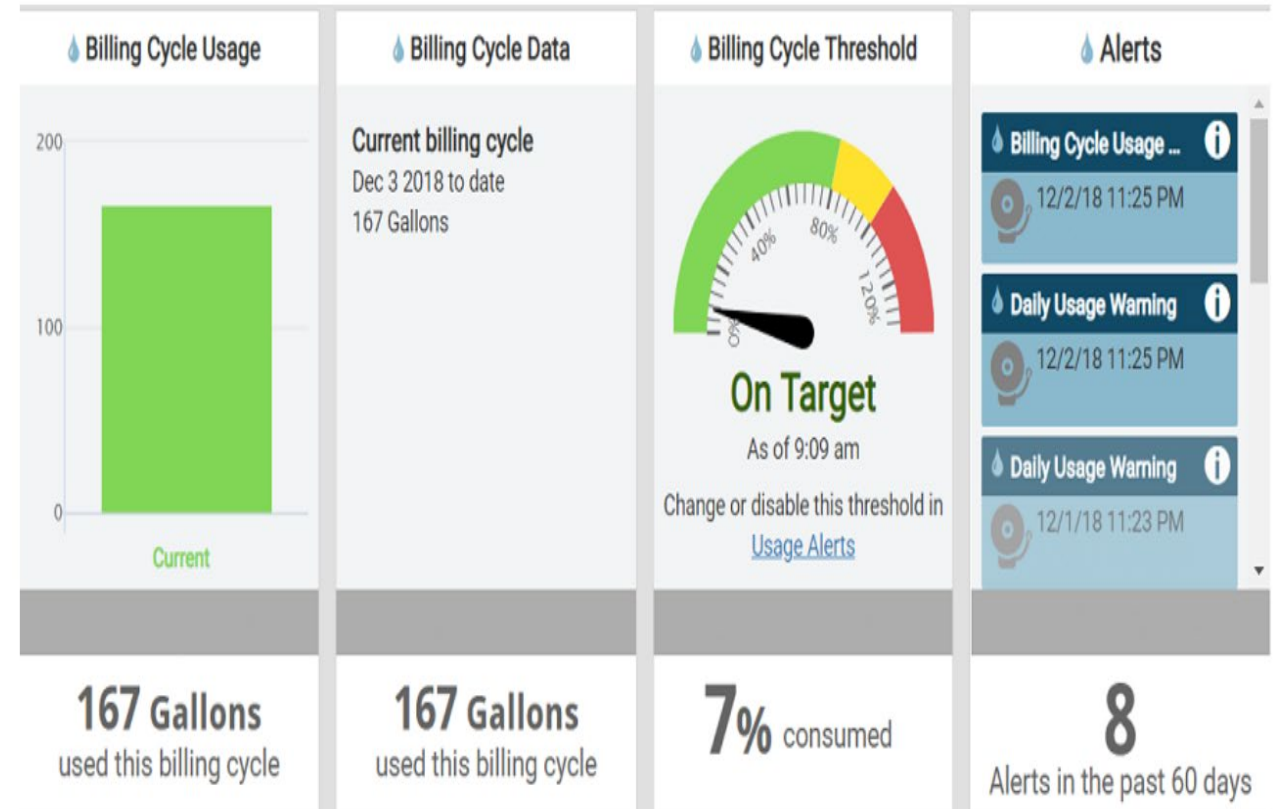
9/8/2021	Welcoming Pittsburgh Community Meeting
9/13/2021	Spring Hill Civic League
9/18/2021	ALCOSAN Open House
9/25/2021	Fall Community Day @ Homestead Park United Methodist
10/9/2021	What's the Point .5K
10/12/2021	Operation Better Block – Zone 5
10/14/2021	Operation Better Block – Zone 8/9
10/16/2021	School Supply Give-Away @ Penn & Winebiddle
10/20/2021	CEC Community Dinner & Conversation
10/21/2021	Representative Wheatly's Golden Luncheon
10/28/2021	Uptown Partners Community Meeting
11/4/2021	Larimer Consensus Group
9/13/2021 – 10/25/2021	City of Pittsburgh Farmers' Markets – East End – 4 markets
9/13/2021 – 10/25/2021	City of Pittsburgh Farmers' Markets – Carrick – 6 markets
9/13/2021 – 10/25/2021	City of Pittsburgh Farmers' Markets – North Side – 3 markets

High Consumption Audit

- As of October 31, 2021, the Cares team has reached out to 142 low-income customers who were identified as having experienced high consumption.
 - Customers = Bill Discount Program enrollees
 - High consumption = An increase of 200% or more as compared to the previous monthly usage
 - This is an extremely labor-intensive process often involving; 1) service visit scheduling, 2) Customer Usage Portal enrollment, 3) consumption counseling, 4) interest removal, 5) payment plan enrollment, 6) ALCOSAN leak credit referrals, and 7) follow-up.

Check Your Water Usage

Our [Customer Usage Portal](#) is a free tool that helps customers track their real-time water usage and receive alerts when there is a spike in water usage. Setting usage alerts can help you detect costly water leaks in your property.



High Consumption Account Review

Rebecca Copney 7/6/2021 3:28 PM

HC & CAP RATE INVESTIGATION

Reached out to Kathy, she is the listed on the account, to advise her of the HC and to provide info about one-time leak credit.

Per previous notes she is aware and also has been vetted for the BDP.

She stated that she is still waiting on plumber, no shut needed. she is aware of the consumption

I advised her to make sure she reached out to us once leak is fixed for the alcosan leak credit info

Sarah Viszneki 10/4/2021 2:08 PM

s/w Kathy occupant per her direct call advised her of Usage Portal and so we scheduled Meter Update Please call Kathy en route 7:30a-Noon Thursday 10/7/2021, 412-915-6837

Sarah Viszneki 10/4/2021 2:50 PM

will visit Kathy's home on Wednesday before farmers market to obtain a photo of her SS letter to forward to Dollar NRG so that she may receive hardship grant & cwaf, per census and her leak has stopped hot water tank was replaced and she can begin spa next

Rebecca Copney 10/15/2021 10:57 AM

Attempted to reach out to Kathy to explain that her documents submitted for the Hardship grant were outdated and she needs to submit updated documents or email in a bank statement showing her SS deposits.

there was no answer and I was not able to leave a vm at this time

I emailed NT, to see if hold on account can be extended since docs submitted were outdated

Rebecca Copney 10/28/2021 12:25 PM

Reached out to Kathy explain that her documents submitted for the Hardship grant were outdated and she needs to submit updated documents or email in a bank statement showing her SS deposits.

There was no answer, vm was too full to leave a message

Program Enrollment

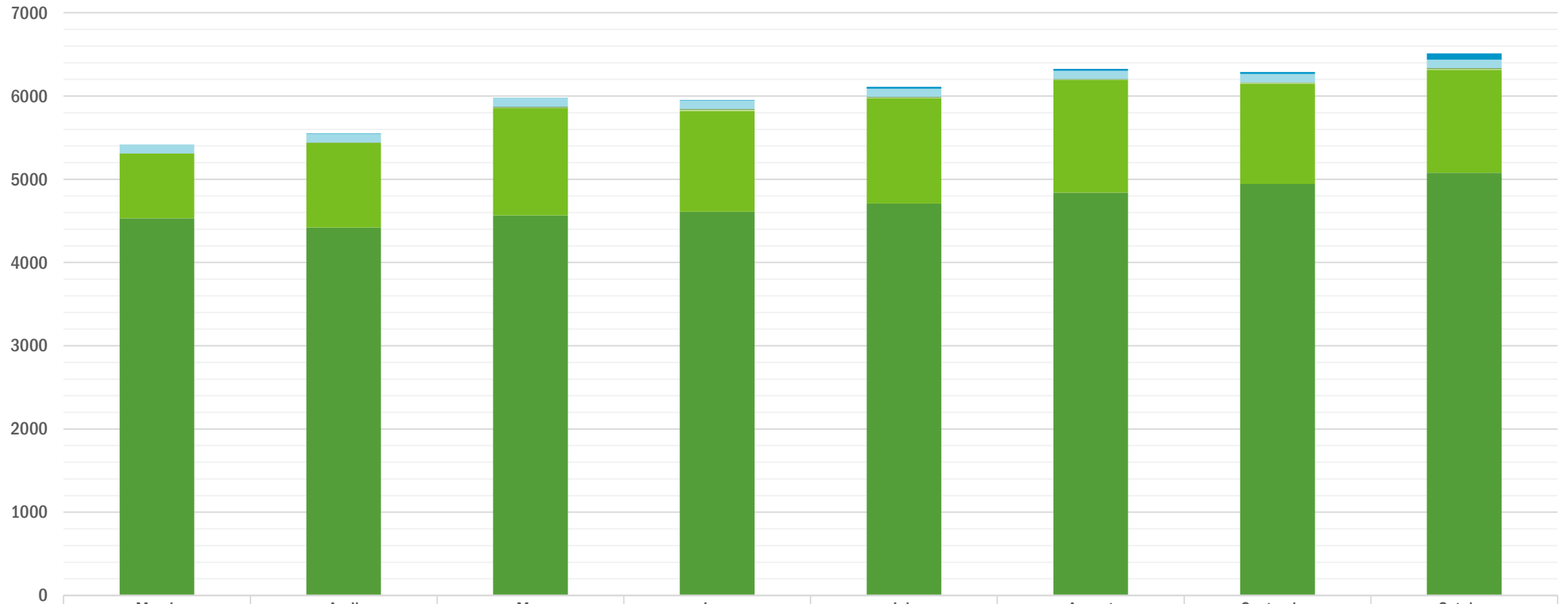
- **Tracking and Reporting**
- **Confirmed Low Income**
- **60-Month Payment Arrangements**
- **Bill Discount Program Applicants**
- **Bill Discount Program Participants**
- **Hardship Grant**
- **Utility Collaboration**
- **Moving Forward**



Tracking and Reporting

- **Cares continues to keep reports of 60-month payment arrangements, BDP Enrollments, Arrearage Forgiveness, Hardship Grants, Outreach and Community Engagement efforts.**
 - **New tracking**
 - **BDP removals and the reason for the removal**
 - **Collaboration with other utility providers**
 - **Cares is cold calling enrollees in 60-month payment arrangements who are not in the BDP.**
 - **Accounts reviewed: 147 (39 new)**
 - **BDP Enrollments during first contact: 29 (~ 19%)**
 - **Cares is cold calling based on a “map method”.**
 - **Utilizing Raftelis data to identify accounts**
 - **Accounts reviewed: 250 (57 new)**
 - **BDP Enrollments during first contact: 43 (~ 17%)**
 - **3 Winter Moratorium sign-ups**
 - **6 additional BDP enrollments after call backs**

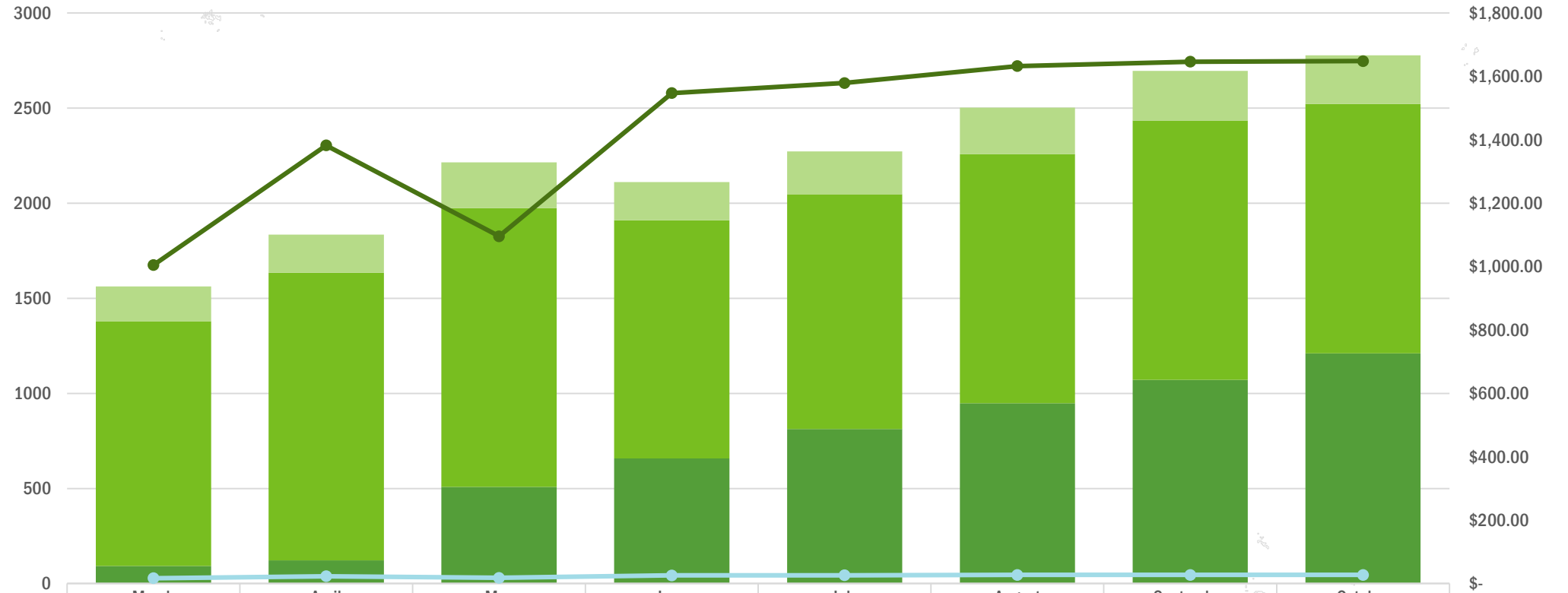
Confirmed Low Income Customers



	March	April	May	June	July	August	September	October
ERAP		6	4	6	24	22	24	77
ALCOSAN Grant	105	102	104	104	100	98	102	102
Hardship Grant	2	4	7	6	5	6	1	6
LSLR Reimbursement	3	0	6	15	8	4	13	13
PAR	777	1018	1291	1211	1268	1357	1204	1237
Bill Discount	4530	4420	4565	4610	4707	4838	4944	5078

Confirmed Low Income

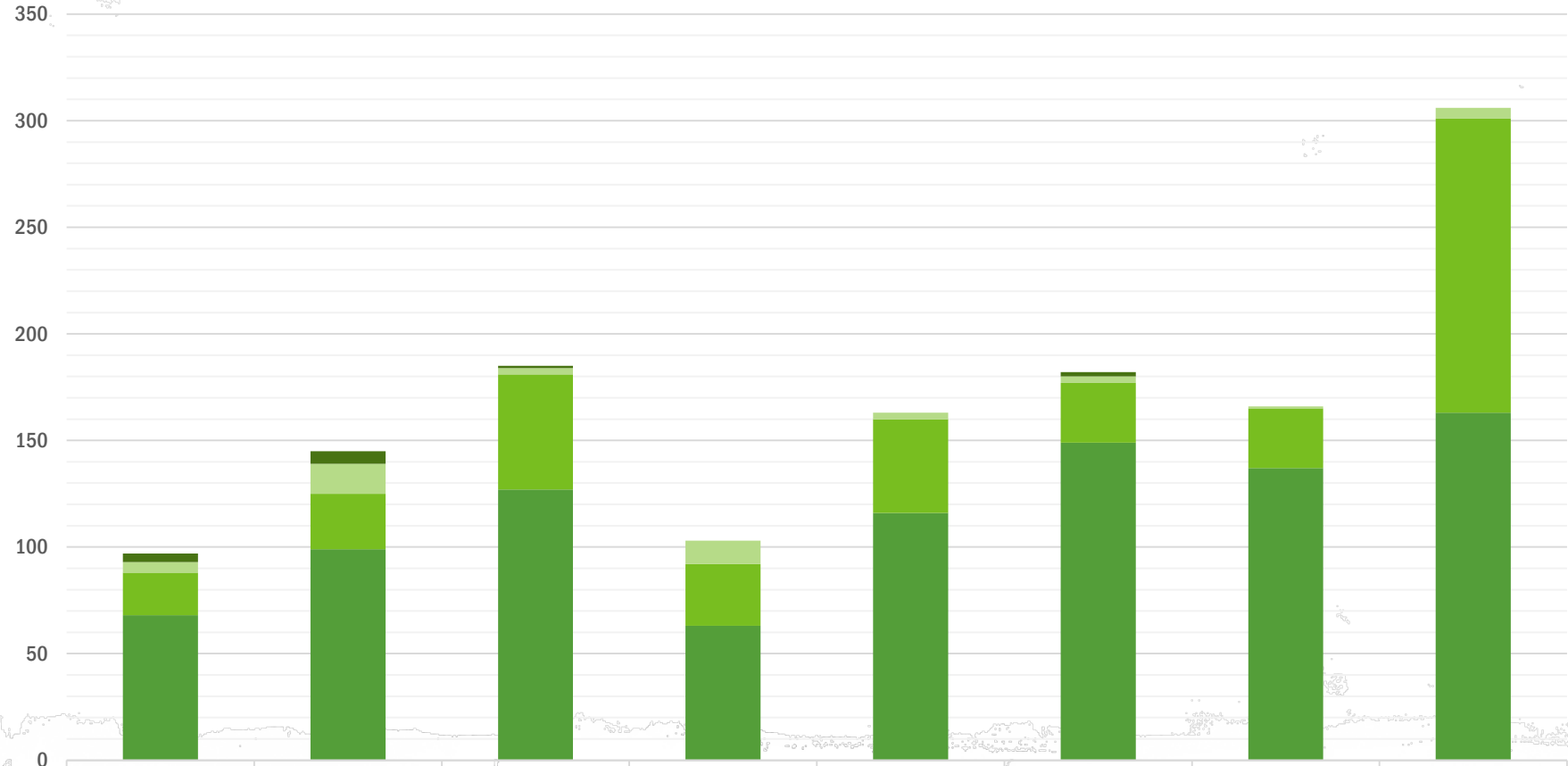
60-Month Payment Arrangements



	March	April	May	June	July	August	September	October
PAR >150%	183	201	240	201	225	244	260	256
PAR < 150%	1286	1512	1465	1252	1234	1310	1364	1312
PAR + Forgiveness Credit	93	122	509	658	813	948	1071	1210
Average Balance	\$1,004.83	\$1,382.30	\$1,095.84	\$1,547.14	\$1,579.14	\$1,632.57	\$1,646.46	\$1,648.19
Average Monthly PAR	\$16.89	\$23.16	\$18.39	\$25.84	\$26.37	\$27.26	\$27.49	\$27.51

60-Month Payment Arrangements

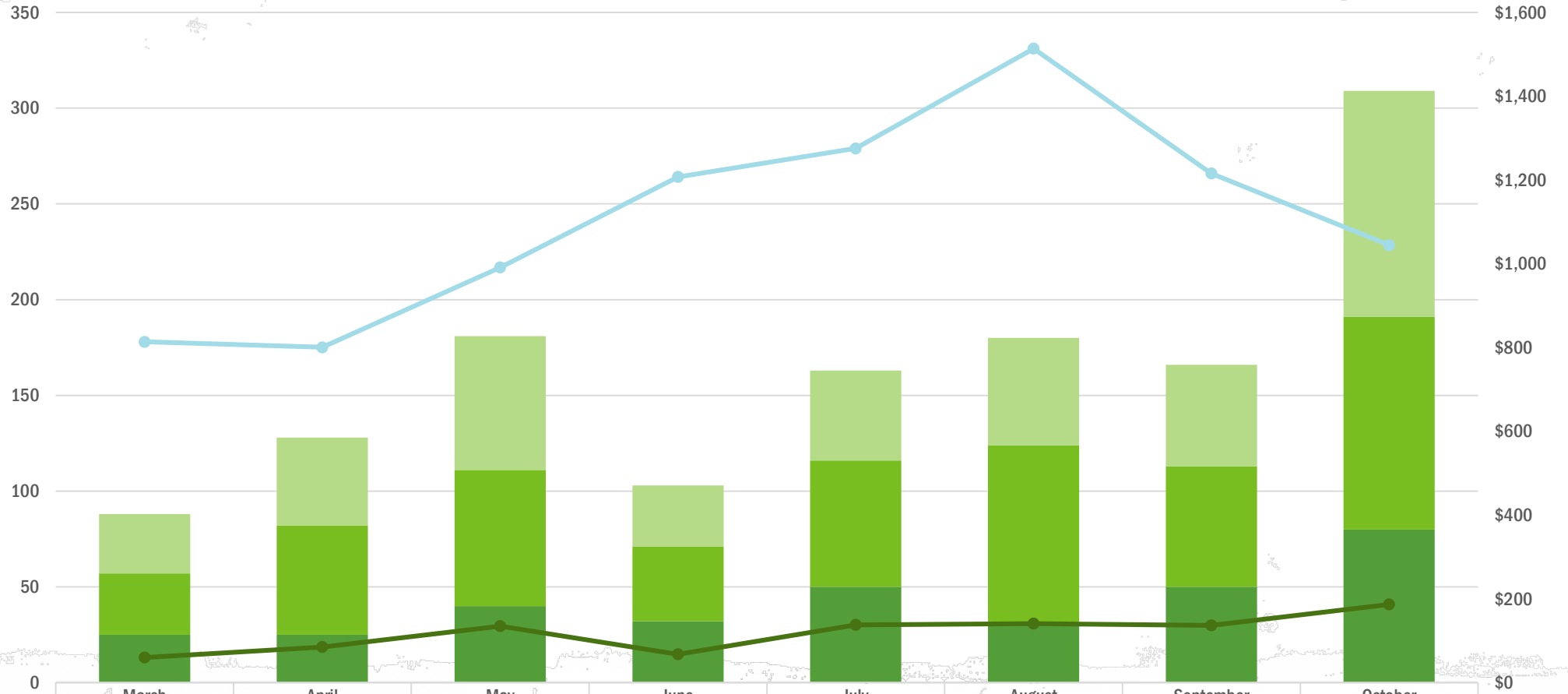
Bill Discount Program Applicants



	March	April	May	June	July	August	September	October
Ineligible - Over Income	4	6	1	0	0	2	0	0
Ineligible - Not a PWSA Customer	5	14	3	11	3	3	1	5
Recertified	20	26	54	29	44	28	28	138
New Enrollment	68	99	127	63	116	149	137	163

Bill Discount Program Applicants

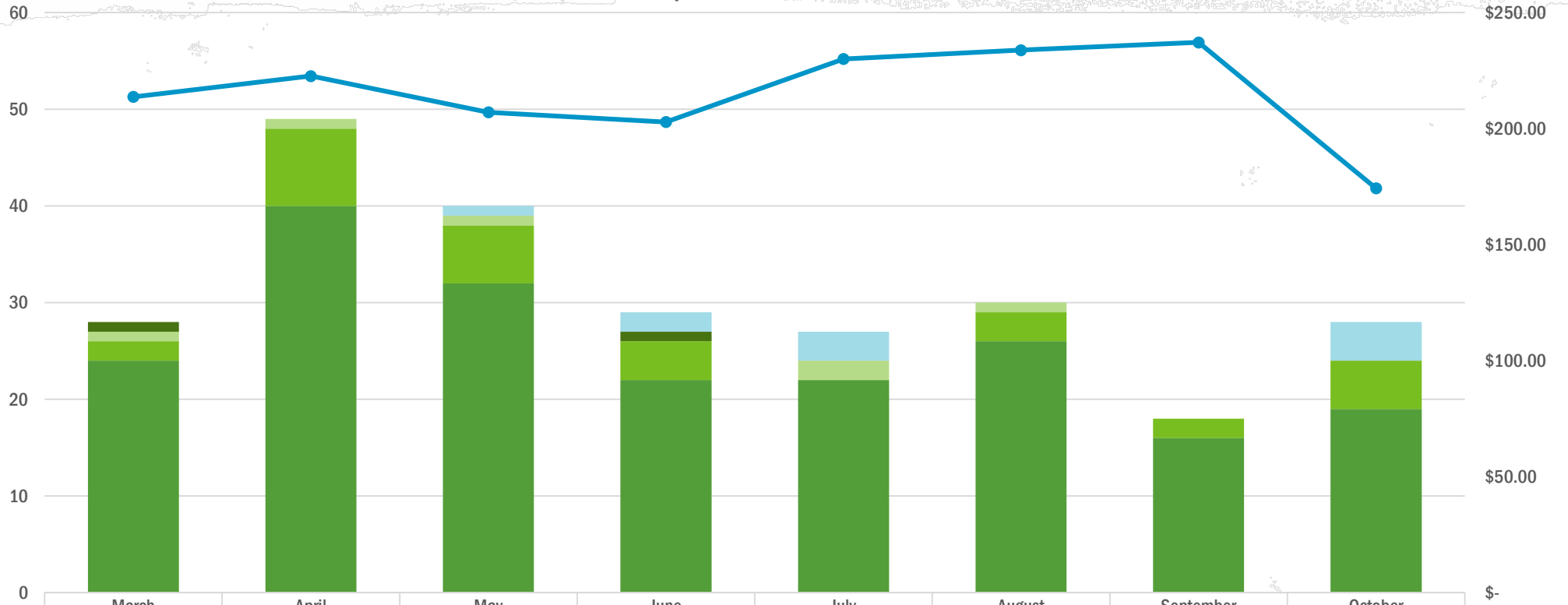
Bill Discount Program Participants



	March	April	May	June	July	August	September	October
100.01%-150% FPL	31	46	70	32	47	56	53	118
50.01%-100% FPL	32	57	71	39	66	93	63	111
0%-50% FPL	25	25	40	32	50	31	50	80
Average Balance	\$753.73	\$715.61	\$856.11	\$1,139.14	\$1,137.29	\$1,372.49	\$1,078.38	\$857.34
Entering with Balances	60	85	135	68	138	141	137	187

Bill Discount Program Participants

Hardship Grants



	March	April	May	June	July	August	September	October
Denied-Other	0	0	1	2	3	0	0	4
Denied-Over Income	1	0	0	1	0	0	0	0
Denied-No Balance	1	1	1	0	2	1	0	0
Denied-Sewer Only	2	8	6	4	0	3	2	5
Approved	24	40	32	22	22	26	16	19
Average Grant	\$213.68	\$222.65	\$207.05	\$202.83	\$230.00	\$233.83	\$237.17	\$174.28

Hardship Grant

Utility Collaboration

- In October, PWSA shared 37 customer contacts with Duquesne Light Company.
 - In September and October, PWSA received 3 accounts from Duquesne Light Company. We have an upcoming meeting to discuss.
 - 1 enrollment; 2 not PWSA customers
- PWSA met with Peoples and discussed sharing customer contact information. We are currently waiting on DEF to schedule a meeting to determine system/information sharing abilities.
 - Peoples suggested that customers could be enrolled in the BDP without consent and advised that we send a letter offering customers to opt-out.
 - Possible mass dissemination of Hardship Grants to vetted Peoples/PWSA customers.

Moving Forward

- Continue to review participants and dismissals on daily/weekly/monthly basis
- Contact tenants/applicants via the Owner/Tenant form and new Webforms; more information about webform success forthcoming
- Continue to attend community meetings
- Cold call by census tract and 60-month payment plans with no BDP enrollment
- Receive call transfers/direct calls to 3107
 - 9/1/2021 - 10/31/2021, handled 136 Contact Center transfers
- Door to door canvassing - Spring
- Ramp up recertifications
 - 1st contact = email/letter from Dollar Energy
 - 30 days elicits second contact from Cares
 - At 60 days, eligible for removal
- Collaborate w/other utility providers on cross enrollment



Outreach

- **Customer Outreach**
 - **Print, Community Events, Social Media**
- **Customer Assistance Campaign**
 - **Google Ads**



Customer Outreach

- **Bill Inserts and Newsletters (monthly):**
 - **111,000 bill inserts**
 - **Currents newsletter**
 - **Mayor's Office Community Affairs newsletter**
- **Press Release: *Enrollment in PWSA's Bill Discount Program Exceeds 5,000 Customers* (October 14, 2021)**





Customer Outreach (continued)

PGH20 Cares presented to leaders of Welcoming Pittsburgh during their virtual call on 9/8/21.

PGH20 Cares attended 25 community meetings/events, including Farmers' Markets three times per week (East End, Northside, and Carrick).

9 Facebook posts/19 engagements (reactions, comments, shares) /942 reach; 11 Tweets/7,848 impressions

Provided 800 postcards and sanitizers for the 2021 Senior Fair To-Go, hosted by Senator Lindsey Williams and State Representatives Emily Kinkead and Sara Innamorato (10/29/21).

Provided 200 postcards to Greater Pittsburgh Food Bank for food drives on 11/16/21 and 12/21/21.

Customer Assistance Google Ad Campaign

- First Launched: March 22nd through May 23rd
- Campaign continued on and off throughout the summer.
 - June 11th – July 23rd
 - Restarted August 27th
- Google ad displays when specific demographics and keywords are entered.
- **Ad Results:**
 - Impressions – 49,800 (the number of people who saw ad)
 - Clicks – 14,100 (the number of people who clicked on it)
 - Phone Calls – 2,280 (the number of people who called PWSA for more information or to enroll)

Ad · www.pgh2o.com/ (412) 255-2423

Reduce Your Water & Sewer Bill | Customer Assistance Available |
Call PWSA to Enroll Today

We all need help sometimes. Call PWSA today to discuss our Customer Assistance Programs. Many options are available to help income-qualified residential customers. Call today.

Ad Campaign Continues to Build Awareness, Generate Interest

- **Increased Web Traffic:**
 - Total Page Views – 14,030
 - Organic Traffic – 5,258 (Visitors coming to page on their own)
 - Paid Traffic – 13,164 (Visitors coming to page after seeing ad)
- **Increased calls to Customer Service:**
 - As of November 17, 2021, the Google Ad Campaign tracked 2,280 calls to Customer Service since initiating the campaign.



During this difficult time, no one should have to choose between paying their water bill and other essential expenses. To help those who need it most, the Pittsburgh Water and Sewer Authority offers several customer assistance programs to income-qualified customers.

Find out if you qualify!

1. Visit our website at pgh2o.com/CAP
2. For more information, contact the PGH2O Cares Team by calling **(412) 255-2423** or emailing pgh2oCares@pgh2o.com
3. To enroll in customer assistance programs, please call Dollar Energy Fund **(866) 762-2343**

Program Highlights — Which one is right for you?

We offer a variety of programs to assist customers with different needs. Depending on your circumstance, one of these programs may provide the help you need.

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- **Hardship Grant Program:** Cash grants, up to \$300 per year, are available through our Hardship Grant Program for water customers at or below 150% FPL. Our average household grant is approximately \$285 and since 2018 we have helped more than 370 Pittsburgh households maintain water service.
- **Flexible Payment Plans:** We are offering payment plans to help customers at all income levels. Regardless of your income, you can be placed on a payment plan making it possible to pay your balance over time without accruing interest or paying additional fees.

Call **(412) 255-2423** or email pgh2oCares@pgh2o.com today!



Free translation services are available by calling **(412) 255-2423 (press 5)** and our customer assistance flyer is available in multiple languages at pgh2o.com/CAP



Thank you

Questions or comments about the LIAAC presentation, please contact Julie Quigley at jquigley@pgh2o.com



PWSA

Petition for Approval of
Pilot Private Service Line

Leak Repair

Exhibit F

[Report an Issue](#)[Pay a Bill](#)

[Home](#) > [Residential & Commercial Customers](#) > [Tips, Maintenance & Prevention](#) > [Water Conservation](#)

Water Conservation



Water is a limited resource. Less than one percent of all the water on Earth can be used by humans for drinking, cleaning, or irrigating plants. The rest is saltwater or frozen in polar ice caps.

Here in Pittsburgh, we draw water from the Allegheny River and clean it at our Water Treatment Plant before it arrives at your tap as drinking water. We produce approximately 65 - 75 million gallons of drinking water every day. It is

important to use this drinking water wisely and not waste it. By conserving water every day, you can reduce your water bill, help protect the environment, and save water resources for future generations.

You can also help reduce local flooding and overflows of sewage into the rivers by using less water in your home, especially during rainstorms. Less water down your drains leaves more room for stormwater. Remember: Reduce water down your drains, especially when it rains!

Check Water Usage & Fix Leaks

- Track your household's real-time water usage on our online customer portal and receive alerts when there is a spike in water usage. Learn more on our [Check Your Water Usage page](#).
- Detect and repair leaks from common household sources such as toilets, faucets, showerheads, and gardening hoses. Learn more on our [Leak Detection page](#).

Everyday Practices

- Turn off the faucet while brushing your teeth to save eight gallons of water a day
- Turn off the faucet while lathering soap when washing your hands or dishes
- Turn off the faucet while shaving
- Take a shorter shower to save between two and five gallons of water each minute
- Only run dishwashers and washing machines with full loads
- Sweep your sidewalk, steps, and driveway instead of hosing off those areas
- Water your plants in the morning or early evening to reduce water lost to evaporation
- Use an automatic shut-off nozzle for your gardening hose to control the flow

- Set sprinklers to water the lawn or garden only – not the street or sidewalk
- Wash your car using water from a bucket over your lawn or a commercial car wash that recycles water

Appliances

- Use an efficient dishwasher instead of washing dishes by hand and save 5,000 gallons of water each year
- Switch to an efficient clothes washer and save 2,000 gallons of water every year
- Replace an older toilet with an efficient model and save between 4,000 and 10,000 gallons of water a year

More Resources

Learn more about water conservation tips and water-saving products on the [EPA's WaterSense webpage](#).

Tips, Maintenance & Prevention

[Residential & Commercial Customers Overview](#)

[Account & Billing Info](#)

[Rates](#)

[Service Changes](#)

[Buying or Selling Property](#)

[Customer Assistance Programs](#)

[Pipe Ownership](#)

[Backflow Device Testing](#)

Tips, Maintenance & Prevention

Water Conservation →

Leak Detection

Protecting Your Pipes

Lead Information

Water Discoloration

Backflow Prevention & Cross Connection

Contact Us

 **412-255-2423**

Report an Emergency **Press 1**

Customer Service **Press 5**

 **Send us a Message**



Contact Us

 **412-255-2423**

Report an Emergency **Press 1**

Customer Service **Press 5**

 **Send us a Message**

 **1200 Penn Avenue**

Pittsburgh, PA 15222

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PWSA

Petition for Approval of
Pilot Private Service Line

Leak Repair

Exhibit G

[Report an Issue](#)[Pay a Bill](#)

[Home](#) > [Residential & Commercial Customers](#) > [Tips, Maintenance & Prevention](#) > [Leak Detection](#)

Leak Detection

Leaking toilets, faucets, showerheads, and other plumbing can waste a lot of water. In fact, a household with a leak wastes an average of 10,000 gallons of water each year. Detecting and repairing leaks is often easy and can save homeowners up to 10 percent on their water bills.

In general, your senses are your best tool. Listen for water running continuously, smell for foul odors coming from a water source, and look for puddling water near your plumbing. If you think a leak exists, shut off all water-using appliances, faucets, showers, and outdoor tools such as hoses or sprinklers. Next, check if your low flow indicator on your water meter has stopped moving. If the indicator is still moving, there is probably a leak somewhere. In rare cases, a water meter itself may be the problem. For tough leaks, contact a registered plumber to make the repairs. If attempting repairs on your own, remember to turn off the correct water valve before you start. Here are some more easy tips you can follow to detect household leaks:

Toilets

If you suspect a toilet leak, check the flapper valve, overflow pipe, and float, which are all located inside the toilet tank. You can also identify a toilet leak by putting a drop of food coloring in the tank. If color shows up in the bowl after 10 minutes, a leak is highly likely. To fix a toilet leak, consult a licensed plumber, hardware store, or home improvement retailer.

Faucets

Make sure all faucets are shut tight when not in use, and be sure to check under the sink as well. If water appears to be leaking from a faucet, you may need to remove and replace worn or damaged washers or other parts. Before replacing these parts, be sure that the replacements are properly sized. This can be done by taking the broken part with you to a hardware store.

Showerheads

Showerheads that leak at just 10 drops per minute waste up to 500 gallons per year. For simple leaks, make sure there is a tight connection between the showerhead and pipe stem. Pipe tape made of Teflon found at most hardware stores is easy to apply and can often help control leaks. It's also a good idea to check the washer or other parts inside the showerhead for damage. More complicated leaks should be passed along to a licensed plumber for repairs.

Outside

Soggy spots in your lawn indicate a leak with a sprinkler or service line. In the case of a private service line leak, contact us to request a shut at the curb so that your registered plumber can make the necessary repairs.

Tips, Maintenance & Prevention

[Residential & Commercial Customers Overview](#)

[Account & Billing Info](#)

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[Leak Detection →](#)

[Protecting Your Pipes](#)

[Lead Information](#)

[Water Discoloration](#)

[Backflow Prevention & Cross Connection](#)

Contact Us

 [412-255-2423](tel:412-255-2423)

Report an Emergency **Press 1**

Customer Service **Press 5**

 [Send us a Message](#)



Contact Us


 [412-255-2423](tel:412-255-2423)

Report an Emergency **Press 1**

Customer Service **Press 5**

 [Send us a Message](#)

 [Send us a message](#)

 1200 Penn Avenue
Pittsburgh, PA 15222

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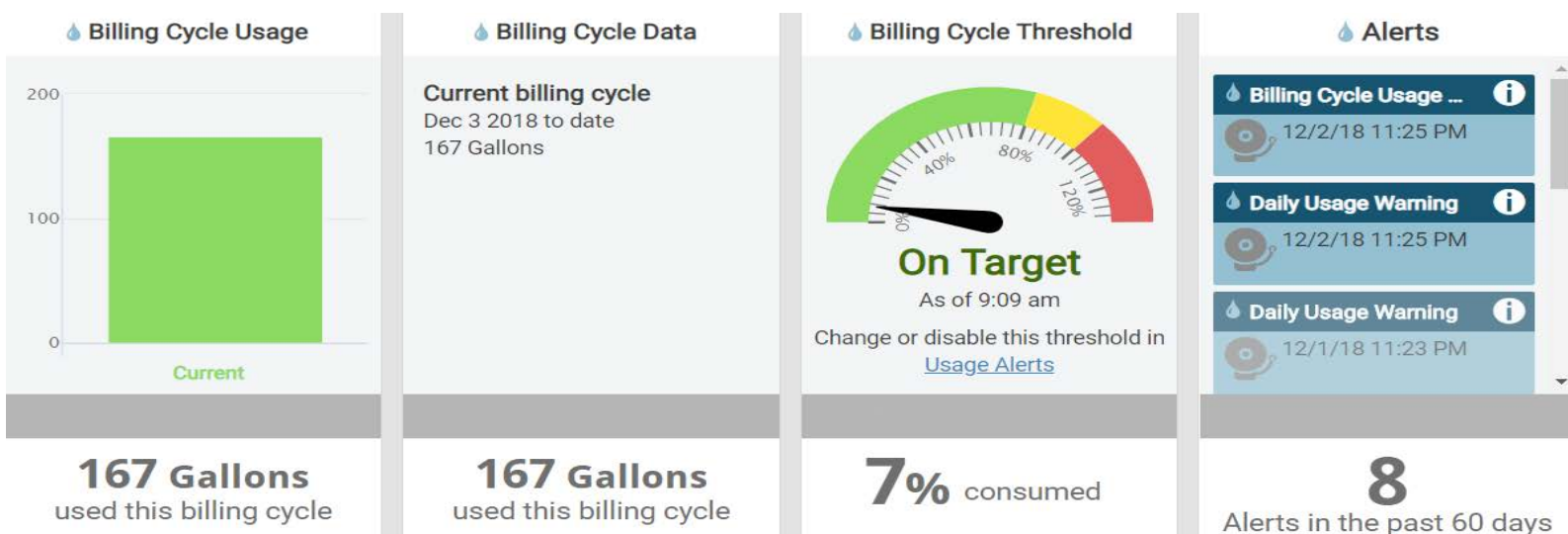
Petition for Approval of
Pilot Private Service Line

Leak Repair

Exhibit H

Our Customer Usage Portal is live!

This new feature will allow you to monitor your water use in real-time and set customized, automated usage alerts. You can even authorize multiple users, such as tenants, to receive usage alerts. Setting usage alerts can help you to detect costly water leaks in your property.



[To sign up for this service:](#)

1. Go to pgh2o.com and click on [Pay a Bill](#)
2. Select "Check Usage"
3. Enter your email address, and click the link provided in an email that you will receive from the portal.
4. Type your full 14-digit account number and meter serial number.
5. Add your cell phone number to receive important alerts via text message, and create a password.
6. Use your email address and password to login.
7. Tour the portal, and set usage thresholds for email and/or text alerts.

For assistance and questions, please call Pittsburgh Water and Sewer Authority Customer Service Monday through Friday 8:00 am to 6:00 pm at 412.255.2423, or email info@pgh2o.com.

PWSA

Petition for Approval of
Pilot Private Service Line

Leak Repair

Exhibit I

Customer Account	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Total Billed	Average Billed	Billed Over Average
1	77.28	77.28	50.83	105.43	165.39	135.41	135.41	195.38	135.41	15.47	105.43	75.44	1,274.16	-1,310.76	-36.60
2	50.31	50.31	131.22	337.89	375.28	105.43	45.45	45.45	45.45	45.45	45.45	15.47	1,293.16	-1,310.76	-17.60
3	104.25	30.37	50.77	69.00	6.37	170.30	67.08	402.55	15.47	118.69	170.30	92.89	1,298.04	-1,310.76	-12.72
4	158.19	131.22	131.64	105.90	75.44	75.44	75.44	165.39	195.38	45.45	105.43	45.45	1,310.37	-1,310.76	-0.39
5	77.28	23.34	50.51	76.61	135.41	165.39	105.43	105.43	105.43	75.44	105.43	285.33	1,311.03	-1,310.76	0.27
6	104.25	77.28	105.70	105.43	75.44	92.89	92.89	6.37	350.94	118.69	118.69	67.08	1,315.65	-1,310.76	4.89
7	14.84	14.84	14.96	16.62	6.37	105.43	1,064.93	45.45	6.37	6.37	6.37	15.47	1,318.02	-1,310.76	7.26
8	50.31	77.28	50.50	18.33	45.45	75.44	105.43	135.41	285.33	135.41	165.39	195.38	1,339.66	-1,310.76	28.90
9	136.00	118.47	147.01	182.66	143.89	114.78	66.67	46.50	69.78	74.43	116.33	138.04	1,354.56	-1,310.76	43.80
10	131.22	23.34	132.60	255.35	135.41	105.43	75.44	135.41	105.43	105.43	105.43	45.45	1,355.94	-1,310.76	45.18
11	64.31	115.29	120.05	51.49	41.15	65.13	44.58	128.47	248.33	297.98	58.28	121.63	1,356.69	-1,310.76	45.93
12	23.34	14.84	23.53	8.31	75.44	135.41	105.43	135.41	195.38	285.33	195.38	165.39	1,363.19	-1,310.76	52.43
13	23.34	50.31	50.77	16.62	45.45	45.45	135.41	165.39	375.28	195.38	135.41	135.41	1,374.22	-1,310.76	63.46
14	50.31	239.10	295.07	283.67	165.39	45.45	75.44	45.45	45.45	15.47	75.44	45.45	1,381.69	-1,310.76	70.93
15	131.22	77.28	77.64	47.02	75.44	75.44	75.44	135.41	375.28	165.39	45.45	105.43	1,386.44	-1,310.76	75.68
16	188.75	107.84	55.97	94.47	142.97	117.47	91.97	66.47	142.97	117.47	117.47	142.97	1,386.79	-1,310.76	76.03
17	77.28	77.28	105.47	105.43	75.44	165.39	195.38	135.41	45.45	105.43	195.38	105.43	1,388.77	-1,310.76	78.01
18	91.39	77.05	84.73	70.26	80.53	118.20	113.07	193.54	217.51	107.93	131.90	125.06	1,411.17	-1,310.76	100.41
19	64.31	80.24	105.73	317.60	397.29	101.08	36.02	63.41	37.73	77.11	75.40	61.70	1,417.62	-1,310.76	106.86
20	62.72	75.46	91.39	88.76	85.67	70.26	131.90	154.15	179.84	161.01	164.43	157.58	1,423.17	-1,310.76	112.41
21	77.28	104.25	77.55	135.18	45.45	45.45	45.45	255.35	345.30	165.39	105.43	45.45	1,447.53	-1,310.76	136.77
22	91.39	96.17	83.43	161.49	107.93	109.64	111.35	87.38	85.67	195.25	178.13	149.02	1,456.85	-1,310.76	146.09
23	50.31	50.31	77.28	106.13	135.41	75.44	135.41	135.41	165.39	195.38	135.41	195.38	1,457.26	-1,310.76	146.50
24	131.22	104.25	158.97	105.80	105.43	105.43	75.44	135.41	165.39	135.41	135.41	105.43	1,463.59	-1,310.76	152.83
25	80.24	27.67	24.65	241.33	25.74	44.58	13.65	113.07	97.65	265.45	479.47	61.70	1,475.20	-1,310.76	164.44
26	77.28	77.28	131.62	105.96	135.41	135.41	105.43	105.43	225.36	195.38	105.43	75.44	1,475.43	-1,310.76	164.67
27	104.25	77.28	77.35	135.10	165.39	105.43	105.43	135.41	135.41	135.41	165.39	135.41	1,477.26	-1,310.76	166.50
28	77.05	56.35	143.96	240.19	525.70	116.49	54.85	78.82	44.58	44.58	59.98	53.14	1,495.69	-1,310.76	184.93
29	85.02	86.61	105.73	93.81	97.65	97.65	106.21	159.30	174.70	140.46	181.56	167.86	1,496.56	-1,310.76	185.80
30	131.22	104.25	132.44	135.36	135.41	105.43	105.43	105.43	45.45	105.43	225.36	165.39	1,496.60	-1,310.76	185.84
31	50.31	50.31	322.22	1,025.20	6.37	6.37	6.37	6.37	6.37	6.37	6.37	6.37	1,499.00	-1,310.76	188.24
32	994.26	158.19	131.76	47.02	45.45	41.28	41.28	15.47	6.37	6.37	6.37	6.37	1,500.19	-1,310.76	189.43
33	50.31	77.28	131.22	308.93	225.36	195.38	135.41	75.44	75.44	45.45	105.43	75.44	1,501.09	-1,310.76	190.33
34	13.97	27.67	51.57	80.34	195.25	111.35	131.90	73.69	121.63	205.52	258.60	231.20	1,502.69	-1,310.76	191.93
35	50.31	77.28	104.70	76.42	75.44	105.43	135.41	135.41	225.36	165.39	165.39	195.38	1,511.92	-1,310.76	201.16
36	242.73	317.60	385.00	89.01	41.15	44.58	44.58	51.42	104.51	53.14	80.53	59.98	1,514.23	-1,310.76	203.47
37	77.28	185.16	239.62	124.39	196.11	221.91	144.50	92.89	6.37	67.08	67.08	92.89	1,515.28	-1,310.76	204.52
38	50.31	104.25	105.07	75.98	105.43	195.38	105.43	105.43	135.41	195.38	225.36	135.41	1,538.84	-1,310.76	228.08
39	50.31	50.31	77.64	282.21	555.20	45.45	75.44	105.43	45.45	105.43	75.44	75.44	1,543.75	-1,310.76	232.99
40	131.22	104.25	160.27	225.36	135.41	135.41	135.41	165.39	225.36	15.47	105.43	6.37	1,545.35	-1,310.76	234.59
41	23.34	50.31	50.50	18.23	45.45	15.47	75.44	135.41	45.45	75.44	855.04	165.39	1,555.47	-1,310.76	244.71
42	158.19	104.25	104.59	105.90	75.44	135.41	45.45	75.44	195.38	405.27	75.44	75.44	1,556.20	-1,310.76	245.44
43	50.31	50.31	105.17	165.21	135.41	225.36	105.43	105.43	45.45	135.41	195.38	255.35	1,574.22	-1,310.76	263.46
44	50.31	77.28	132.43	165.28	435.26	165.39	75.44	105.43	75.44	135.41	75.44	105.43	1,598.54	-1,310.76	287.78
45	104.25	158.19	213.61	224.30	225.36	135.41	75.44	105.43	105.43	75.44	105.43	75.44	1,603.73	-1,310.76	292.97
46	57.94	54.75	75.46	130.83	190.12	164.43	154.15	150.74	280.86	202.10	89.09	56.57	1,607.04	-1,310.76	296.28
47	158.19	104.25	132.19	135.31	135.41	135.41	165.39	105.43	135.41	165.39	135.41	105.43	1,613.22	-1,310.76	302.46
48	131.22	131.22	105.05	105.64	165.39	225.36	165.39	195.38	105.43	75.44	105.43	105.43	1,616.38	-1,310.76	305.62
49	77.28	77.28	158.82	282.21	375.28	195.38	135.41	75.44	45.45	45.45	75.44	75.44	1,618.88	-1,310.76	308.12
50	104.25	77.28	131.88	105.80	75.44	75.44	105.43	105.43	405.27	225.36	105.43	105.43	1,622.44	-1,310.76	311.68
51	77.28	50.31	104.59	223.03	285.33	195.38	165.39	105.43	135.41	75.44	105.43	105.43	1,628.45	-1,310.76	317.69
52	77.28	77.28	77.35	47.96	105.43	105.43	45.45	165.39	105.43	195.38	285.33	345.30	1,633.01	-1,310.76	322.25
53	131.22	104.25	131.88	76.37	135.41	135.41	135.41	135.41	135.41	165.39	195.38	165.39	1,646.93	-1,310.76	336.17

Customer Account	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Total Billed	Average Billed	Billed Over Average
54	158.19	104.25	77.28	106.04	105.43	105.43	75.44	135.41	105.43	195.38	225.36	285.33	1,678.97	-1,310.76	368.21
55	77.28	104.25	131.32	77.02	135.41	165.39	165.39	165.39	135.41	105.43	195.38	225.36	1,683.03	-1,310.76	372.27
56	24.49	26.08	29.92	30.88	18.90	18.90	20.60	30.88	29.17	17.18	1,080.46	363.04	1,690.50	-1,310.76	379.74
57	158.19	158.19	131.88	164.69	225.36	195.38	135.41	105.43	105.43	75.44	135.41	105.43	1,696.24	-1,310.76	385.48
58	158.19	104.25	186.47	105.68	135.41	165.39	165.39	105.43	135.41	105.43	165.39	165.39	1,697.83	-1,310.76	387.07
59	158.19	131.22	132.80	135.41	135.41	135.41	105.43	165.39	195.38	135.41	135.41	135.41	1,700.87	-1,310.76	390.11
60	158.19	158.19	186.42	172.82	170.30	144.50	41.28	41.28	118.69	118.69	170.30	221.91	1,702.57	-1,310.76	391.81
61	104.25	131.22	212.29	151.35	144.50	170.30	92.89	118.69	67.08	118.69	196.11	196.11	1,703.48	-1,310.76	392.72
62	116.88	100.95	140.77	108.95	121.63	116.49	126.76	183.26	238.06	205.52	152.45	107.93	1,719.65	-1,310.76	408.89
63	131.22	104.25	158.82	135.23	165.39	135.41	135.41	105.43	165.39	255.35	135.41	135.41	1,762.72	-1,310.76	451.96
64	109.02	103.07	110.21	132.26	147.80	125.15	127.06	125.78	299.32	284.58	195.58	6.37	1,766.20	-1,310.76	455.44
65	104.25	77.28	132.19	135.31	105.43	196.11	118.69	196.11	247.72	144.50	170.30	144.50	1,772.39	-1,310.76	461.63
66	104.25	104.25	104.25	205.01	196.11	144.50	144.50	170.30	118.69	144.50	170.30	170.30	1,776.96	-1,310.76	466.20
67	14.84	14.84	239.27	134.40	131.67	151.06	131.67	144.50	118.69	118.69	299.33	299.33	1,798.29	-1,310.76	487.53
68	77.28	104.25	104.25	135.08	135.41	165.39	225.36	285.33	285.33	195.38	45.45	45.45	1,803.96	-1,310.76	493.20
69	55.75	104.25	131.62	105.94	165.39	195.38	255.35	225.36	135.41	135.41	135.41	165.39	1,810.66	-1,310.76	499.90
70	158.19	131.22	158.19	193.03	165.39	105.43	135.41	195.38	195.38	105.43	135.41	135.41	1,813.87	-1,310.76	503.11
71	131.22	131.22	159.35	135.31	165.39	165.39	135.41	105.43	135.41	165.39	135.41	255.35	1,820.28	-1,310.76	509.52
72	131.22	104.25	104.70	105.81	105.43	105.43	135.41	165.39	165.39	165.39	195.38	345.30	1,829.10	-1,310.76	518.34
73	212.13	131.22	158.66	135.16	135.41	135.41	165.39	165.39	105.43	105.43	165.39	225.36	1,840.38	-1,310.76	529.62
74	131.22	185.16	158.80	223.22	285.33	118.69	92.89	118.69	144.50	118.69	144.50	118.69	1,840.38	-1,310.76	529.62
75	199.72	151.93	147.15	161.11	161.01	133.62	144.25	107.01	152.01	207.86	153.56	128.73	1,847.96	-1,310.76	537.20
76	158.19	131.22	131.32	106.06	165.39	165.39	285.33	135.41	105.43	135.41	165.39	165.39	1,849.93	-1,310.76	539.17
77	85.02	104.14	94.58	82.02	89.09	77.11	123.34	128.47	306.54	284.29	255.18	227.79	1,857.57	-1,310.76	546.81
78	185.16	158.19	132.80	195.38	135.41	165.39	105.43	135.41	195.38	135.41	165.39	165.39	1,874.74	-1,310.76	563.98
79	158.19	158.19	131.62	193.64	255.35	285.33	195.38	135.41	75.44	105.43	75.44	135.41	1,904.83	-1,310.76	594.07
80	104.25	131.22	131.76	194.02	195.38	222.47	247.72	67.08	118.69	196.11	170.30	144.50	1,923.50	-1,310.76	612.74
81	131.22	131.22	131.88	164.69	165.39	105.43	144.50	196.11	247.72	144.50	144.50	221.91	1,929.07	-1,310.76	618.31
82	77.28	131.22	131.62	71.08	92.89	144.50	67.08	144.50	273.53	255.35	315.32	225.36	1,929.73	-1,310.76	618.97
83	104.25	104.25	158.30	222.26	135.41	195.38	165.39	225.36	165.39	225.36	195.38	34.96	1,931.69	-1,310.76	620.93
84	158.19	158.19	185.70	164.40	195.38	255.35	196.11	92.89	144.50	92.89	170.30	118.69	1,932.59	-1,310.76	621.83
85	131.22	158.19	158.80	135.19	165.39	135.41	165.39	195.38	195.38	165.39	165.39	165.39	1,936.52	-1,310.76	625.76
86	158.19	104.25	213.65	164.98	165.39	135.41	135.41	165.39	195.38	165.39	225.36	135.41	1,964.21	-1,310.76	653.45
87	131.22	131.22	131.88	164.69	135.41	165.39	135.41	135.41	225.36	195.38	194.68	225.36	1,971.41	-1,310.76	660.65
88	158.19	185.16	212.74	164.37	195.38	195.38	135.41	165.39	195.38	135.41	135.41	105.43	1,983.65	-1,310.76	672.89
89	185.16	131.22	159.35	164.98	165.39	165.39	165.39	165.39	195.38	135.41	165.39	195.38	1,993.83	-1,310.76	683.07
90	131.22	77.28	131.32	193.22	225.36	165.39	135.41	195.38	165.39	195.38	225.36	165.39	2,006.10	-1,310.76	695.34
91	185.16	212.13	213.47	224.12	135.41	105.43	105.43	165.39	195.38	135.41	195.38	165.39	2,038.10	-1,310.76	727.34
92	185.16	158.19	212.74	135.16	195.38	165.39	135.41	165.39	225.36	135.41	135.41	195.38	2,044.38	-1,310.76	733.62

Customer Account	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Total Billed	Average Billed	Billed Over Average
93	131.22	346.98	131.76	194.02	165.39	118.69	144.50	144.50	170.30	221.91	221.91	67.08	2,058.26	-1,310.76	747.50
94	131.22	131.22	158.65	135.16	375.28	315.32	75.44	195.38	225.36	105.43	105.43	105.43	2,059.32	-1,310.76	748.56
95	400.92	320.01	403.57	172.82	67.08	67.08	118.69	144.50	196.11	92.89	41.28	41.28	2,066.23	-1,310.76	755.47
96	131.22	239.10	347.95	135.16	135.41	135.41	165.39	135.41	165.39	165.39	165.39	135.41	2,086.61	-1,310.76	775.85
97	104.25	23.34	50.56	76.47	45.45	45.45	45.45	75.44	225.36	675.13	555.20	165.39	2,087.49	-1,310.76	776.73
98	185.16	212.13	185.16	222.00	255.35	225.36	135.41	105.43	105.43	165.39	135.41	165.39	2,097.62	-1,310.76	786.86
99	131.22	104.25	131.83	144.50	402.55	402.55	118.69	118.69	118.69	118.69	144.50	170.30	2,106.46	-1,310.76	795.70
100	185.16	131.22	212.74	164.40	345.30	135.41	135.41	165.39	195.38	135.41	165.39	135.41	2,106.62	-1,310.76	795.86
101	185.16	158.19	185.86	164.55	165.39	165.39	165.39	195.38	165.39	135.41	195.38	225.36	2,106.85	-1,310.76	796.09
102	107.32	134.40	120.07	105.60	89.09	77.11	82.25	155.87	239.76	316.81	371.61	332.23	2,132.12	-1,310.76	821.36
103	158.19	185.16	213.65	135.31	285.33	105.43	135.41	165.39	195.38	196.78	225.36	135.41	2,136.80	-1,310.76	826.04
104	158.19	131.22	212.74	164.48	165.39	135.41	195.38	165.39	225.36	165.39	195.38	225.36	2,139.71	-1,310.76	828.95
105	131.22	131.22	185.30	164.16	195.38	225.36	135.41	165.39	255.35	195.38	165.39	195.38	2,144.94	-1,310.76	834.18
106	61.12	80.24	115.29	228.41	239.76	224.36	238.06	195.25	232.92	186.69	186.69	181.56	2,170.35	-1,310.76	859.59
107	131.22	131.22	158.66	135.16	165.39	165.39	165.39	135.41	135.41	135.41	255.35	465.24	2,179.25	-1,310.76	868.49
108	148.74	185.38	169.71	190.12	142.18	114.78	284.29	198.68	171.28	147.31	190.12	244.91	2,187.50	-1,310.76	876.74
109	14.84	14.84	973.68	1,055.18	105.43	6.37	6.37	6.37	6.37	6.37	6.37	6.37	2,202.19	-1,310.76	891.43
110	158.19	131.22	158.82	194.02	195.38	225.36	255.35	195.38	225.36	195.38	135.41	135.41	2,205.28	-1,310.76	894.52
111	158.19	158.19	293.87	135.16	225.36	255.35	165.39	165.39	165.39	135.41	165.39	195.38	2,218.47	-1,310.76	907.71
112	23.34	77.28	77.64	164.62	135.41	105.43	135.41	75.44	45.45	615.16	795.07	15.47	2,265.72	-1,310.76	954.96
113	212.13	212.13	266.83	164.37	135.41	195.38	135.41	165.39	195.38	195.38	225.36	165.39	2,268.56	-1,310.76	957.80
114	158.19	185.16	212.13	222.00	195.38	195.38	165.39	165.39	195.38	225.36	165.39	195.38	2,280.53	-1,310.76	969.77
115	104.25	104.25	104.43	106.03	195.38	135.41	135.41	285.33	285.33	255.35	165.39	405.27	2,281.83	-1,310.76	971.07
116	160.26	172.77	161.45	162.05	206.52	247.45	184.70	187.25	199.42	228.87	228.87	144.36	2,283.97	-1,310.76	973.21
117	158.19	23.34	14.96	105.64	195.38	165.39	195.38	255.35	345.30	435.26	225.36	165.39	2,284.94	-1,310.76	974.18
118	185.16	158.19	185.72	193.75	165.39	195.38	255.35	285.33	165.39	165.39	165.39	165.39	2,285.83	-1,310.76	975.07
119	158.19	158.19	212.76	193.75	195.38	195.38	135.41	165.39	195.38	195.38	285.33	195.38	2,285.92	-1,310.76	975.16
120	131.22	158.19	158.66	135.16	165.39	165.39	195.38	255.35	315.32	225.36	195.38	195.38	2,296.18	-1,310.76	985.42
121	373.95	50.31	23.67	16.08	885.02	195.38	225.36	255.35	15.47	225.36	6.37	45.45	2,317.77	-1,310.76	1,007.01
122	50.31	77.28	77.90	105.64	165.39	195.38	195.38	555.20	615.16	105.43	105.43	75.44	2,323.94	-1,310.76	1,013.18
123	131.22	212.13	322.15	194.67	165.39	225.36	165.39	225.36	165.39	195.38	195.38	135.41	2,333.23	-1,310.76	1,022.47
124	266.07	212.13	187.67	195.38	285.33	225.36	165.39	135.41	75.44	135.41	195.38	255.35	2,334.32	-1,310.76	1,023.56
125	171.04	151.93	143.96	167.84	111.35	188.40	173.73	139.59	276.13	307.16	235.79	302.51	2,369.43	-1,310.76	1,058.67
126	174.23	108.91	224.86	167.64	157.58	164.43	162.72	140.46	217.51	291.13	323.67	236.35	2,369.49	-1,310.76	1,058.73
127	508.80	427.89	461.70	285.33	225.36	105.43	45.45	75.44	75.44	15.47	105.43	45.45	2,377.19	-1,310.76	1,066.43
128	75.46	67.50	77.05	53.45	169.57	601.04	679.80	316.81	102.79	44.58	181.56	34.09	2,403.70	-1,310.76	1,092.94
129	239.10	158.19	213.65	194.67	225.36	195.38	195.38	225.36	255.35	225.36	165.39	135.41	2,428.60	-1,310.76	1,117.84
130	210.87	186.97	267.63	276.31	183.26	195.25	159.30	198.68	299.69	154.15	184.98	130.19	2,447.28	-1,310.76	1,136.52
131	159.89	159.89	160.42	157.39	128.47	176.42	212.37	174.70	304.84	226.07	356.20	237.79	2,454.45	-1,310.76	1,143.69
132	86.98	41.70	62.55	23.83	15.72	1,201.13	664.96	44.64	117.75	69.00	69.00	57.40	2,454.66	-1,310.76	1,143.90
133	158.19	158.19	185.72	135.18	195.38	165.39	165.39	195.38	315.32	435.26	225.36	135.41	2,470.17	-1,310.76	1,159.41
134	142.37	155.11	178.10	172.75	167.86	200.39	176.42	196.96	239.76	299.69	313.40	227.79	2,470.60	-1,310.76	1,159.84
135	78.65	77.05	73.06	73.69	75.40	114.78	82.25	53.14	1,070.18	657.55	71.97	58.28	2,486.00	-1,310.76	1,175.24
136	126.44	252.28	455.75	400.60	166.14	154.15	109.64	147.31	229.50	191.82	143.89	126.76	2,504.28	-1,310.76	1,193.52
137	239.10	320.01	429.83	253.06	225.36	195.38	195.38	195.38	195.38	75.44	75.44	105.43	2,505.19	-1,310.76	1,194.43
138	50.31	77.28	104.58	47.47	25.92	45.45	16.87	105.43	285.33	495.22	525.20	735.10	2,514.16	-1,310.76	1,203.40
139	104.25	104.25	159.29	135.31	195.38	195.38	105.43	225.36	195.38	285.33	465.24	345.30	2,515.90	-1,310.76	1,205.14
140	120.07	322.38	521.50	392.77	159.30	164.43	137.03	184.98	186.69	106.21	111.35	118.20	2,524.91	-1,310.76	1,214.15
141	212.13	158.19	159.33	164.98	135.41	165.39	195.38	195.38	255.35	285.33	345.30	285.33	2,557.50	-1,310.76	1,246.74
142	185.16	104.25	213.98	195.00	165.39	225.36	165.39	345.30	405.27	225.36	195.38	135.41	2,561.25	-1,310.76	1,250.49
TOTALS													1,862.16		78,298.95