



March 18, 2024

VIA E-FILE

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

**Re: Valuation of Acquired Municipal Water & Wastewater Systems – Act 12 of 2016
Implementation. Docket No. M-2016-2543193**

Dear Secretary Chiavetta:

Attached for filing, please find the **Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)** respectfully submitted in response to the Commission's above mentioned Tentative Supplemental Implementation Order, published in the Pennsylvania Bulletin on February 17, 2024 (54 Pa.B. 906).

Respectfully submitted,

A handwritten signature in black ink that reads "John W. Sweet". The signature is written in a cursive style with a horizontal line above the name.

John W. Sweet, Esq.
Counsel for CAUSE-PA

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Valuation of Acquired Municipal Water & Wastewater :
Systems—Act 12 of 2016 Implementation : Docket No. M-2016-2543193

COMMENTS OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY
IN PENNSYLVANIA (CAUSE-PA)

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I. INTRODUCTION

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA)¹ respectfully submits the following Comments in response to the Commission's Tentative Supplemental Implementation Order (Order), which was published in the Pennsylvania Bulletin on February 17, 2024. The Order proposes revisions to the Pennsylvania Public Utility Commission's (Commission) existing procedures for applications filed under Section 1329 of the Pennsylvania Utility Code,² related to the valuation of acquired municipal water and wastewater systems.

CAUSE-PA is deeply concerned with the pace and trajectory of water and wastewater acquisitions under section 1329 and the resulting financial effects of those acquisitions on consumers of both an acquired and acquiring utility. Regionalization and consolidation of water and wastewater services can – in appropriate cases – produce economies of scale, improve water quality and safety for struggling systems, and increase access to important consumer protections. However, under section 1329's valuation structure, these purported benefits have quickly given way to substantial rate impacts that are exacerbating already-rising infrastructure and water treatment costs and threatening the ability of tens of thousands of low and moderate income Pennsylvanians to reasonably afford life-sustaining water and wastewater services.

Over the last few years, it has become abundantly clear that the resulting financial impact of section 1329 acquisitions on water and wastewater consumers (often materializing several years following approval of a sale) have not been adequately conveyed to either the selling utility or the

¹ CAUSE-PA is a statewide unincorporated association of low income individuals which advocates on behalf of its members to enable consumers of limited economic means to connect to and maintain safe and affordable water, electric, heating and telecommunication services. CAUSE-PA membership is open to moderate and low income individuals residing in the Commonwealth of Pennsylvania who are committed to the goal of helping low income families maintain affordable access to utility services and achieve economic independence and family well-being.

² 66 Pa. C.S. § 1329.

public – nor have those likely impacts been fully considered in determining whether a proposed purchase under section 1329 is in the public interest. We are especially concerned about the resulting impact of section 1329 acquisitions on economically vulnerable customers, who often shoulder a disproportionately high financial burden as a result of a high-cost purchase. Low income families across Pennsylvania already struggle to afford water and wastewater service, and are regularly forced to make impossible tradeoffs between necessities – foregoing food, energy, rent, medicine, and medical care to keep the water running in their home.³

Although acquisitions can have a deeply consequential impact on Pennsylvania families and businesses that rely on water and wastewater service from both the acquired and acquiring utility, they most often have little or no voice in the process. Far too often, public input processes are performative in nature, requiring decision makers to “check a box” after a deal is struck rather than requiring decision makers to listen and respond to the concerns of impacted consumers before a final decision is reached.

CAUSE-PA supports the Commission’s proposals to improve public participation, engagement, and notification in section 1329 acquisitions. However, we do not believe the proposals go far enough to ensure impacted communities will be fully informed of the likely rate impacts of a potential sale and have a meaningful voice in the process *before a decision is made*. Further refinement of the public notice and engagement requirements will help ensure a final proposed acquisition will advance *substantial* and *quantifiable* public benefits - without risking the ability of all those in our community to access safe and affordable water and wastewater services now or in the future. We believe the Commission has ample authority to further

³ See Coty Montag, [Water/Color: A Study of Race and the Water Affordability Crisis in America’s Cities](https://www.naacpldf.org/wp-content/uploads/Water_Report_FULL_5_31_19_FINAL_OPT.pdf), NAACP Legal Defense and Educational Fund, Inc, May 2019, at p. 28, available at: https://www.naacpldf.org/wp-content/uploads/Water_Report_FULL_5_31_19_FINAL_OPT.pdf

strengthen required procedures to ensure acquired entities and impacted consumers have a voice in the process and understand the likely impact long before resulting rate impacts are felt by the acquired and acquiring utilities' customers. Our comments below advance a number of suggestions to further improve participation, engagement, notification, and accountability.

II. BACKGROUND

The instant Order is the third in a series of Implementation Orders issued by the Commission to implement Act 12 of 2016 (hereafter Act 12), which amended Chapter 13 of the PA Public Utility Code to add section 1329, (66 Pa. C.S. § 1329).⁴ As noted in the Commission's Order, section 1329 established a procedure for acquiring utilities and selling utilities to use fair market valuation (rather than depreciated original cost) when an acquiring utility purchases a water or wastewater system located in the Commonwealth.⁵

Through its Order, the Commission proposes to amend existing procedures for applications filed under section 1329. Specifically, the Commission is proposing to (1) add provisions for public hearings, (2) enhance provisions related to rate impact notifications, (3) establish default weights for appraisals, and (4) annually publish a non-binding Reasonableness Review Ratio.

The Commission states in its Order that the impetus for these proposed amendments is the recent rise in public and policy makers' interest in Act 12.⁶ After eight years of Act 12 implementation, customers are taking notice of sharp rises in their water utility bills and are contacting their elected officials for relief and voicing their displeasure to the Commission through

⁴ Final Implementation Orders entered on October 27, 2016, and February 28, 2019, at the instant docket.

⁵ Order at 2.

⁶ Order at 2.

public input hearings regarding subsequent rate increases – often long after their systems have been acquired.⁷

Water and wastewater services are increasingly unaffordable across the Commonwealth, as rates for service have risen precipitously over the last decade.⁸ Low income families now regularly pay well more than 10% of their household income for water and wastewater services alone, and there are few programs available to help meaningfully offset those costs.⁹ Critical infrastructure investment needs, including stormwater system requirements and lead remediation issues, have driven substantial rate increases in communities across the state, for both public and investor-owned water and wastewater systems. However, infrastructure costs are not the only reason water and wastewater rates are increasing. The acquisition of relatively healthy and financially stable publicly owned water and wastewater systems pursuant to section 1329, and the full recovery of those acquisition costs through rates, is also a significant contributing factor to the growing unaffordability of water and wastewater rates.

For example, in Pennsylvania American Water Company's (PAWC) 2020 rate case, it proposed to recover \$27.5 million from ratepayers to cover the costs of its acquisitions.¹⁰ Two years later, in its 2022 rate case, PAWC proposed that its customers foot the bill for another \$28.9

⁷ See *Pa. PUC v. PAWC*, R-2023-3043189, Public Input Hearing Transcripts: *Jan. 30, 2024 Scranton*, Testimony of Sen. Marty Flynn; Rep. Brideget Koserowski; Rep. Maureen Madden; Dunmore Mayor Max Conway; Allegheny County Commissioner Bill Gaughan; Dunmore Council Member Janet Breyer; *see also* Testimony of Thom Wrugbly; Steven Nelson; Rich Brill; Lee Morgan. *Jan. 31, 2024 Exeter Twp.*, Testimony of Sen. Judy Schwank; *see also* testimony of Keith Souer; Ron Foy; Alicia Shussett; Kathleen Schwartz; Christopher Cappuccitti; Michelle Detko; Mike Cortazzo; Ruth Benderoth; Natalie Rarick; Sean Hollis; Gerald Erman.

⁸ Nina Lakhani, *Millions of Americans Can't Afford Water as Bills Rise 80% in a Decade*, the Guardian (June 23, 2020), <https://www.theguardian.com/us-news/2020/jun/23/millions-of-americans-cant-afford-water-bills-rise>.

⁹ See *Pa. PUC v. Pa. American Water*, Docket Nos. R-2020-3019369, R-2020-3019371, Testimony of Mitchell Miller on Behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (filed September 8, 2020) (Testimony revealed that – at low income households paid up to 8% of household income for water - and as high as 13% of household income for wastewater, depending on their income and geographic region.).

¹⁰ See *Pa. PUC v. PAWC*, R- R-2020-3019369, PAWC St. 1, Nevirauskas, Sched. RPN-1.

million dollars to cover acquisition costs.¹¹ Now, in its 2023 rate case currently pending before the Commission, PAWC has requested another \$25.9 million to cover acquisitions.¹²

Pennsylvania's investor-owned water and wastewater utilities most often charge substantially higher rates compared to municipally owned utilities, which leads to increased hardships on low income customers when publicly owned systems are purchased by investor-owned systems.¹³ Unlike municipally owned utilities, investor-owned utilities are entitled to earn a return on their investment which is added to the utility's rates. Likewise, the cost of capital is often lower for municipally owned utilities, which have greater access to low or no cost municipal financing, grants, and other public funds to help pay for infrastructure projects.

When a municipally owned utility with lower residential rates is acquired by an investor-owned utility, there are often promises to shield the acquired utility customers from further rate increases for a period of time following a rate increase. However, any agreed-upon rate freeze will inevitably come to an end. As we have seen in recent rate proceedings, the acquiring utility will eventually seek to consolidate various rate schedules into a single, unified rate – sometimes causing severe rate shock for customers of the acquired system. For example, in Aqua Pennsylvania's 2021 rate case, it proposed to raise rates for customers of acquired wastewater systems in Limerick and Whitpain by over 80%.¹⁴ Likewise, in PAWC's 2022 rate case it proposed

¹¹ Pa. PUC v. PAWC, R- R-2022-3031672, PAWC St. 1, Everette, Sched AEE-1.

¹² Pa. PUC v. PAWC, R-2023-3043189, PAWC St. 1, Everette, Sched. AEE-1.

¹³ In 2017, the University of Delaware Water Resources Center, which tracks water rates for public and private water utilities in Delaware, Pennsylvania, New Jersey, and Maryland, found that the average water rate for public water utilities in those states was \$6.13 per 1,000 gallons, while private utilities charged \$10.90 per 1,000 gallons – a difference of 44 percent. Since 2017, Pennsylvania's two largest investor-owned water and wastewater utilities – Aqua and Pennsylvania American Water – have each been approved for significant additional rate increases, folding in the cost of fair market valuation into rates. See ITPI, *The Risks Posed by Water Privatization* (July 2020), https://www.inthepublicinterest.org/wp-content/uploads/ITPI_WaterPrivatization_July2020_final.pdf.

¹⁴ Pa. PUC v. Aqua PA, R-2021-3027386, Aqua Ex. 5-B, R-2021-3027386, Sched. WW-7.

to increase rates for customers in Steelton by over 80%.¹⁵ In its currently-pending 2023 rate case, PAWC proposed to increase rates for customers in Valley Township by 217%.¹⁶

It is critical that impacted households are both fully informed about the likely impacts of a proposed acquisition and provided a meaningful opportunity to be heard early in the process – long before a proposed sale is finalized.

III. DISCUSSION

A. Public Hearings

In its Order, the Commission proposes to require entities to conduct at least two in-person public hearings prior to executing an asset purchase agreement. The Commission states that the “public hearings should address the proposed acquisition, describe the potential rate impacts, provide the opportunity for public comment and be held at venues within the municipal boundaries of the selling utility, or at the nearest reasonable venues with Commission notification.”¹⁷ The Commission provides in a footnote that in-person hearings may also include hybrid access through online streaming or telephone.¹⁸ The Commission explains that the requisite public hearings could be conducted as part of other public meetings held by municipal governments when the acquisition is on the agenda, as well as “other meetings or open houses hosted by either the acquiring or selling utility.”¹⁹ The Commission notes that either the selling or acquiring utility should be required to notify the selling utility’s customers of the public hearing, and provides examples of notification venues – such as local newspapers and social media – that appear to be consistent with public notice requirements used by other Pennsylvania agencies.²⁰

¹⁵ Pa. PUC v. PAWC, R-2022-3031672, PAWC St. 10 at Ex. CBR-1.

¹⁶ Pa. PUC v. PAWC, R-2023-3043189, CAUSE-PA St. 1 at 8; PAWC St. 10 at Ex. CBR-1.

¹⁷ Order at 3.

¹⁸ Order at 4.

¹⁹ Order at 3.

²⁰ See Pennsylvania Department of Environmental Protection, Office of Environmental Justice, Interim Final Environmental Justice Policy, Document Number 015-0501-002, published September 16, 2023, page 9.

CAUSE-PA supports the Commission's proposal to require more robust public engagement, but respectfully asserts that the Commission needs to go much further to ensure both acquired and acquiring entities elicit meaningful and informed public input in a timely manner that informs the entities' ultimate decision whether to proceed with a proposed sale.

First, CAUSE-PA urges the Commission to be more prescriptive in the timing of the proposed public input hearings relative to finalizing the details of a proposed sale. If hearings are not held until after negotiations conclude, it is unlikely that the concerns raised by the public will be meaningfully considered and incorporated into any final agreement. We urge the Commission to require that the acquired and acquiring entities host at least one public input hearing early in the process – well before the terms and conditions of a potential sale are fully negotiated. A second or subsequent public input hearing should be held later in the process, but before a final purchase agreement is signed, to present the details of a proposed sale and to review the projected impact on customers of both the acquired and acquiring entities. At this second or subsequent hearing, the entities should be required to explain how they addressed concerns raised at the initial public input hearing, and permit consumers to respond and provide further comment on the details of the proposed sale. In turn, the Commission should require the acquired and acquiring entities to include an explanation of how they addressed consumer concerns raised at each of the public input hearings as part of any subsequent application for approval of a proposed sale. As noted below, the entities should be required to create a formal, publicly available transcript of each hearing to include as an attachment to their application.

Moreover, we urge the Commission to require *stand-alone* public input hearings, and eliminate the option that hearing requirements could be fulfilled by including the topic on the agenda of a broader public meeting or otherwise held in tandem with “other meetings or open

houses hosted by either the acquiring or selling utility.”²¹ CAUSE-PA submits that an acquired public entity should be required to include regular updates on a potential or pending sale as a standing agenda item at all general public meetings for the duration of a negotiated sale. However, this level of ongoing transparency should not be used as a substitute for a formal public input hearing focused exclusively on the issue at hand. The requisite public hearings should be standalone engagements, which provide all impacted consumers (*both of the acquired and acquiring utility’s customer base*) with a meaningful opportunity to learn about the proposed sale, ask clarifying questions, and provide comments and/or testimony. Again, the acquired and acquiring entities should be required to demonstrate in their application how the terms and conditions of a proposed sale are responsive to the input gathered through the public hearing process.

The gravity of a proposed sale of publicly owned water and wastewater systems, and the resulting impact on rates, necessitates individualized consideration that can be later reviewed by the Commission to determine whether a proposed sale appropriately balances the potential public benefits against the likely harms. The issues should not be lumped in with general meetings that may include other business, may not be widely publicized or known, and may not have any transcript to allow for later review. Allowing an acquisition to be one of many agenda items may deter or diminish participation in the hearing, especially if an agenda is stacked with other important or controversial items that a municipality needs to address. That could limit the time needed to present and then allow for adequate comment and discussion on the acquisition, which could substantively undermine the purpose of the public hearing process. Similarly, public hearings also should not be permitted to be combined with open houses or other related events.

²¹ Order at 3.

Embedding a public hearing in another standing or otherwise scheduled event does not convey the message that the companies are willing to entertain public commentary or listen to the needs of potentially new customers.

Importantly, under the section 1329 paradigm, rates paid by customers of the *acquiring* utility will increase with each additional acquisition as the acquiring utility seeks to recover the costs of the acquisition through rates. These customers must be informed about the impact of the acquisition on their rates and have an opportunity to comment on the record and have their concerns considered by the Commission in its determination on the proposed transaction. Embedding the public hearing into an existing public meeting or event held by a local municipal government or hosted by the selling utility does not provide customers of the acquiring utility an adequate opportunity to comment on a proposed sale.

Holding public hearings separate from other meetings and matters provides the focus and attention on the acquisition and gives the matter the appropriate and necessary weight. In furtherance of this point, key leadership and decision makers of both the acquired and acquiring utilities should be required to attend all public hearings to ensure customer questions are answered and concerns are heard by those who will ultimately approve the terms and conditions of a proposed sale. CAUSE-PA contends that meaningful engagement at a public hearing requires that all relevant rate impact information is presented in advance of and during the hearing, and that there is adequate time for public comment both during the hearing and for a period of time after for anyone who wishes to submit written comment.

We further submit that the required public input hearings should be transcribed, and transcripts should be made publicly available and included as part of an application to the Commission for approval of a proposed section 1329 acquisition.

It is also critical that public input hearings are accessible to and inclusive of all impacted customers, and we urge the Commission to provide additional guidance on this point. Inclusion necessarily requires considerations for language and locational accessibility. In other words, acquired and acquiring entities should be required to provide an interpreter for non-English speakers and/or those using American Sign Language, and hearings should be held in a central location that is accessible to the entire community – with consideration to the proximity of reliable public transit options. If an acquired entities’ service territory covers a larger region, it may necessitate additional public input hearings. We recommend the Commission establish detailed accessibility guidelines, perhaps through the utilization of a working group, to help ensure public input hearings are fully accessible to impacted communities. CAUSE-PA does not object to allowing public hearing to have a hybrid option, *so long as* anyone accessing the hearing remotely is able to provide comment through their chosen medium for connecting to the meeting. In other words, if a remote option is offered, individuals calling into the meeting should be able to participate if they choose.

Finally, CAUSE-PA urges the Commission to improve its guidance for how the acquired and acquiring entities communicate with impacted consumers about scheduled public input hearings. Specifically, we recommend that the Commission require the *acquired* utility to send its customers a direct, written, plain language notice of any planned public input hearings at least 30 days in advance of each public input hearing. In turn, the acquiring utility should be required, at minimum, to post notice of planned public input hearings on its public website, on social media, and in local newspapers or newsletters. Consistent with our recommendations below, in section B (Rate Impact Notification), the public input hearing notices should include a plain language rate impact statement and chart that identifies the anticipated rate impact at different usage levels. We

recommend that the Commission develop a template for this notice, perhaps through the utilization of an informal working group.

While we agree with the Commission that an acquired or acquiring utility should utilize various forms of communication to promote public input hearings, we note that none of the listed options in the Commission's Order, alone, will adequately reach an acquired utilities' entire customer base.²² We are concerned that the Commission's guidance, as drafted, could be construed as requiring acquired and acquiring utilities to use just one of the required methods – for instance, posting notice once in a local newspaper. Such efforts would be wholly inadequate to provide impacted consumers with meaningful notice of the opportunity to learn about and provide public input on a proposed sale.

B. Rate Impact Notification

The Commission proposes to strengthen existing requirements for rate impact notice by requiring verification or affidavit that both selling and acquiring utilities are aware of potential rate impacts the transaction may have on the selling utility's customers, the selling utility publicly communicated such implications on rates through notice to customers, and that both selling and acquiring utilities understand the Commission may shift rate allocations.²³

CAUSE-PA appreciates the Commission efforts to improve identification and disclosure of anticipated rate impacts. Nevertheless, we urge the Commission to further strengthen its guidance to ensure that all customers of both the acquired and acquiring utility are properly informed about the potential long-term economic impact of a proposed transaction.

²² Order at 3. "Examples of effective notice include local newspapers, community newsletters, faith community bulletins, public service announcements, social media posts shared with community groups and municipalities, local radio and television stations, posting in areas of high foot traffic, communications to local community groups, and posting shared with local community centers. Direct outreach to concerned residents may also be considered as notice, whether through a phone call, text, letter, or email."

²³ Order at 4.

First, we urge the Commission to further clarify how an acquired utility proves it has “publicly communicated” a potential rate impact to its existing customers. Without further clarification, the acquired and acquiring entities could obfuscate this requirement to minimize opposition to a proposed sale which could be lucrative to both the acquired and acquiring entity – at the expense of its customers. For instance, an acquired utility could claim that it “publicly communicated” with impacted consumers by providing oral disclosure at a public hearing or posting notice in a single publication. Such efforts would be wholly inadequate to meaningfully inform the vast majority of customers about anticipated rate impacts of a proposed sale.

Consistent with our recommendation above, CAUSE-PA urges the Commission to require the acquired utility to send written, plain-language notice to consumers of its planned public input hearing that *includes* a plain language rate impact statement and chart showing the anticipated rate impact for customers at different usage levels, *both before and after the expiration of any contractual terms which may delay a rate increase on the acquired utility’s customers*. The notice should explain that the Commission may shift resulting rate allocations in a manner that conflicts with any commitments made by the acquiring utility. Again, we recommend that the Commission develop a template for this notice, perhaps through the utilization of an informal working group.

In addition to providing direct written notice of anticipated rate impacts to all customers of the acquired utility, we recommend the following information be made available on both the acquiring and acquired utility’s website:

- A plain language statement of rate impacts, including a chart of anticipated rate impacts for customers with various usage levels.
- Transcripts from the public hearings.
- Any bill inserts, notices, brochures, or educational materials related to the proposed sale.
- A copy of any written public comments, letters, or other correspondence received regarding support for or opposition to a proposed sale.

- Analysis of the rate impact on low income customers of the acquiring and selling utility, and a mitigation plan to assist economically vulnerable customers including creation or expansion of universal service programming (as described below).
- The availability of translation / interpretation services.

Requiring both the acquired and acquiring utility to publicly post this information to the entities' respective websites will help ensure that all impacted customers – including customers of the acquired utility - are duly informed of the anticipated rate impacts of the sale.

Moreover, as part of its rate impact analysis, CAUSE-PA recommends that the Commission require entities to analyze the impact of a proposed acquisition on low income customers of both the acquiring utility and the acquired utility. Using Census data, the entities should be required to identify the percentage of the acquired customer base with income at or below 150% of the Federal Poverty Level (FPL) and should identify the water and wastewater burden of households at each low income tier (0-50% FPL, 51-100% FPL, 101-150% FPL) at anticipated rates. This analysis should be required to be included as part of the entities' application and, as noted above, should be included on each entities' website. Applicants should be encouraged to include an explicit plan within their application to mitigate any identified economic impact to these vulnerable groups of customers, including but not limited to the creation or expansion of universal service programming and other measures to ensure that customers of the selling and acquiring companies will be able to connect with and maintain affordable water and wastewater service in their home.

Whether an acquired utility's customer base will be able to reasonably afford water and wastewater service following an acquisition is directly related to whether an acquisition will provide a substantial public benefit or whether it is contrary to the public interest. Thus, the economic makeup of the community and the potential future rate impact should be subject to

advanced analysis and disclosures for the Commission and interested parties to assess whether a proposed transaction will promote universal accessibility and affordability of service.

Finally, language access must be considered when providing this essential information to customers. All customers, including those with limited English proficiency, need to understand the implications of water or wastewater sales and how that could impact their ability to afford water service. Thus, all notices should be translated in Spanish and should include information in multiple languages about the availability of additional translation services available when calling the utility.

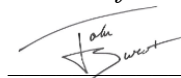
C. Default Weights for Appraisals and Reasonableness Review Ratio

CAUSE-PA does not take a position on the appraisal practices of evaluators to establish fair market value or the Commission's proposed reasonableness review ratio at this time. However, we reserve the right to respond to the comments of other parties on these issues.

IV. CONCLUSION

CAUSE-PA appreciates the opportunity to comment on this critically important issue and respectfully requests the Commission consider our recommendations alongside Commission proposals for implementation and engagement. We reserve the right to file reply comments to further expand or amend our recommendations in response to the proposals of other parties.

Respectfully Submitted,
Counsel for CAUSE-PA



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