

INTRODUCTION

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS FOR THE RECORD.

A. Joseph F. Woodward, Jr., 852 Wesley Drive, Mechanicsburg, Pennsylvania 17011.

Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?

A. I am employed by Pennsylvania-American Water Company (“PAWC” or the “Company”) as the Senior Manager – Operations.

Q. WHAT ARE YOUR RESPONSIBILITIES AS PAWC’S SENIOR MANAGER OPERATIONS?

A. I am responsible for all water and wastewater operations in Central Pennsylvania (“Central PA”), managing a team of approximately 80 professionals in 11 districts, serving 84,697 customer connections.

Q. PLEASE DESCRIBE YOUR PROFESSIONAL EDUCATION AND EXPERIENCE.

A. I received a Bachelor of Science Degree from Wilkes University in Environmental Engineering in 1995. I started my career in the water and wastewater industry working as an operator/meter reader for the Borough of Ashland, PA from 1995-1997. From 1997 to 1999, I worked as an Operations Supervisor for American Water Service Company, Inc. (“Service Company”) in Ashland, PA and was responsible for performing daily lab testing for a 1.0 MGD Surface Water Filtration Plant, making chemical feed adjustments, reading water meters, and completing monthly reports for submission to the Pennsylvania

1 Department of Environmental Protection (“DEP”) and United States Environmental
2 Protection Agency (“EPA”). In 1999, I was promoted to a Project Manager for Service
3 Company for the I-81 Corridor Projects in Northeast PA which included two water
4 systems and five wastewater systems. I remained in this role until 2001 and was
5 responsible for complete operations for seven water and wastewater systems including
6 supervising seven employees, constructing project budgets, and making monthly
7 operations reporting to various municipal and township boards. From 2000-2001, I also
8 was a part time instructor for the DEP teaching Water Treatment Operations Volumes 1
9 & 2, and Math for Water & Wastewater Treatment Plant Operators Classes. In 2001, I
10 was promoted to Project Manager of Service Company for the Clarksville, Indiana
11 Wastewater Treatment Operations. My responsibilities included managing all aspects of
12 operations including treatment at a 5 MGD Trickling Filter Wastewater Treatment Plant,
13 maintenance of 33 Pump Stations, supervising nine employees, managing & updating a
14 five-year Capital Improvements Plan. I remained in this position until 2004 when I was
15 then promoted to the Contract Operations Manager for the Central Region of American
16 Water. In this position, I was responsible for Contract Operations & Maintenance for
17 five large projects spanning four states including Indiana, Ohio, Iowa, and Louisiana. In
18 2006, I accepted a position to move over into our regulated operations as a Field
19 Operations Manager for Southern Indiana. I was responsible for overall operations for
20 the Southern Indiana, Newburgh, and Seymour Districts for Indiana American Water
21 Company. I supervised 35 employees and managed relationships with five resale water
22 company customers in Southern Indiana. I accepted a position in 2008 to return to
23 PAWC as the Field Operations Manager for Central PA. My responsibilities in this role

1 included oversight of the distribution and collection system operations for nine water and
2 two wastewater systems throughout Central PA. I also supervised 50 employees,
3 managed capital budgets, and maintained relationships with local elected public officials.

4 In 2015, I was promoted to my current role of Senior Manager of Operations for
5 Central PA for PAWC. In this role, I am responsible for all aspects of production,
6 distribution, collection, and water quality of eight water and three wastewater systems. I
7 oversee a group of 80 professionals in this current role. I hold multiple certifications in
8 Pennsylvania including a Class A Water Treatment Operators Certificate, Pennsylvania
9 Class B Wastewater Treatment Operators Certificate, and Pennsylvania Class E in both
10 Distribution and Collections Systems Operator Certificates. I also currently serve as a
11 board member representing Carrol Township on the Dillsburg Area Water & Wastewater
12 Authority.

13 **Q. HAVE YOU PREVIOUSLY TESTIFIED BEFORE THE PENNSYLVANIA**
14 **PUBLIC UTILITY COMMISSION (“COMMISSION”)?**

15 **A.** Yes. In 2008, I testified on behalf of PAWC before the Commission in the Borough of
16 Camp Hill v. PAWC at Docket No. P-2008-2075142.

17 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

18 **A.** I will be testifying about the anticipated day-to-day operations of the wastewater
19 collection and treatment system (“System”) currently owned and operated by the
20 Borough of New Cumberland (“BNC”) that PAWC has agreed to acquire
21 (“Transaction”). I will also describe in my testimony some of the customer service

1 enhancements that BNC's current customers will receive once they become customers of
2 PAWC.

3 **DESCRIPTION OF SYSTEM OPERATIONS**

4 **Q. PLEASE DESCRIBE THE OPERATIONS OF THE BNC SYSTEM.**

5 A. For a detailed description of the System, please refer to the written direct testimony of my
6 colleague, Michael J. Guntrum, PAWC Statement No. 2. Up until recently, BNC
7 operated the System with a total of five employees. One BNC employee recently retired
8 and BNC is currently operating the System with a total of four employees.

9 **Q. PLEASE DESCRIBE PAWC'S PLAN FOR THE INTEGRATION OF BNC'S**
10 **OPERATIONS INTO PAWC'S EXISTING WASTEWATER OPERATIONS.**

11 A. As described further below in my testimony, PAWC plans to operate the System with
12 BNC's four employees and manage the System in conjunction with PAWC's existing
13 Central PA operations.

14 **Q. PLEASE DESCRIBE HOW PAWC WILL MANAGE THE INTEGRATION**
15 **TRANSITION.**

16 A. PAWC has assembled a transition team to manage the transition of existing staff and
17 operations from the BNC. The transition team has two tiers – a senior management
18 group, and the functional teams. The senior tier comprises of leaders from each of the
19 support functions, including Business Development, Operations, Engineering, Customer
20 Experience, Information Technology Services, External Affairs, Legal, Human Resources

1 Health & Safety, Maintenance Services, Water Quality and Environmental Compliance.
2 Each support function has its own team, meeting frequently depending on activity in any
3 group. The transition team will ensure that all environmental, employee, operations, and
4 business requirements are addressed.

5 **TRANSACTION IS IN THE PUBLIC INTEREST**

6 **Q. PLEASE EXPLAIN WHY YOU BELIEVE THE TRANSACTION IS IN THE**
7 **PUBLIC INTEREST.**

8 **A.** As discussed in the direct testimony of Bernard J. Grundusky, PAWC Statement No. 1,
9 the geographic overlap between the BNC System and PAWC's certificated service
10 territory and existing Central PA operations creates opportunities for functional and
11 operational consolidation along with associated efficiencies and cost savings. In
12 addition, it creates opportunities to offer improvements to the customer service
13 experience currently had by existing BNC System customers.

14 **Q. WILL THERE BE ANY UNNECESSARY DUPLICATION OF OPERATIONS**
15 **FACILITIES FOLLOWING THE CLOSING OF THE TRANSACTION?**

16 **A.** No. BNC's System is a stand-alone wastewater system within PAWC's existing water
17 and wastewater system footprint and will be operated and managed in conjunction with
18 PAWC's existing Central PA operations.

19 **Q. PLEASE PROVIDE AN OVERVIEW OF PAWC'S CENTRAL PA**
20 **OPERATIONS.**

1 A. PAWC’s system-wide operations are divided into seven geographical areas, and Central
2 PA is the PAWC local operations from where the BNC System is located and will be
3 managed. The Central PA operations include a total of eleven water and wastewater
4 departments and, functionally, are divided into southern and northern regions for
5 purposes of day-to-day supervision. The Central PA water operations consist of eight
6 water districts, including Mechanicsburg, Hershey, Milton, Berwick, Frackville, Lake
7 Heritage, McEwensville and Wildcat, providing reliable water service to a total of 80,450
8 customers. The Central PA wastewater operations consist of three wastewater districts,
9 including Fairview Township, Franklin Township and McEwensville, providing reliable
10 wastewater service to a total of 4,265 customers. When the Transaction is complete, the
11 Central PA wastewater operations will be expanded to include the BNC System for a
12 total of four wastewater districts serving 7,423 wastewater customers. The Central PA
13 water and wastewater departments both have access to the shared support services, as
14 discussed further below.

15 The Central PA operations are currently managed and overseen by my role,
16 Senior Manager – Operations, with overall responsibility for the eleven water and
17 wastewater departments, including responsibility for all aspects of production,
18 distribution, collection, and water quality as well as a range of shared support services,
19 including purchasing, environmental compliance, health and safety. The Senior Manager
20 role currently has responsibility for management and oversight of 80 water and
21 wastewater professionals. When the Transaction is complete, the Senior Manager’s role
22 will expand to include responsibility for the BNC’s wastewater department for a total of

1 84 employees. The Senior Manager reports directly to the Senior Director – Operations,
2 who in turn directly reports to the Vice President – Operations.

3 Reporting directly to the Senior Manager are two superintendents each with
4 responsibility and oversight over the southern and northern regions of the Central PA
5 operations. The northern region includes the water districts of Milton, Berwick,
6 Frackville and Wildcat, and the water and wastewater districts of McEwensville. The
7 southern region includes the water districts of Mechanicsburg, Hershey and Lake
8 Heritage and the wastewater districts of Fairview Township and Franklin Township.

9 **Q. PLEASE DESCRIBE HOW PAWC WILL MANAGE THE DAY-TO-DAY**
10 **OPERATIONS OF THE BNC SYSTEM ONCE IT IS ACQUIRED.**

11 **A.** The System will be managed as a separate wastewater district within PAWC’s Central
12 PA wastewater operations. When the Transaction is complete, the wastewater
13 department of the southern region of the Central PA operations will be expanded to
14 include the BNC System, and employees for Fairview Township, Franklin Township and
15 BNC will be managed under shared supervision. PAWC plans to regionalize the
16 wastewater operations of Fairview Township and BNC for purposes of emergency
17 response and shared equipment, which will give PAWC greater flexibility and
18 efficiencies to operate the BNC System. Specifically, employees for Fairview Township
19 and BNC will be shared for purposes of responding to emergency and/or weekend calls
20 and equipment between the two districts also will be shared. This will allow for better
21 response times to emergency situations, greater flexibility in employee schedules and
22 greater efficiencies in operation.

1 **Q. ARE OTHER PAWC EMPLOYEES AVAILABLE TO ASSIST WITH SYSTEM**
2 **OPERATIONS, AS NEEDED?**

3 **A.** Yes. PAWC’s Central PA operations include resources from more than 100 operational,
4 engineering and administrative staff. As discussed above, the Central PA operations
5 include a water department, a wastewater department and a shared support department
6 which houses common functions, including payroll, purchasing, environmental
7 compliance, and health and safety. Employees in both the water and wastewater
8 departments will support each other when appropriate and necessary, particularly in
9 emergency situations. In addition, as described further below, all operations, and all
10 employees within PAWC and within the broader American Water footprint have access
11 to each other when circumstances require and/or when a very specialized skill or
12 experience is required to support a local issue.

13 **Q. PLEASE DESCRIBE THE ADDITIONAL SHARED SUPPORT RESOURCES**
14 **THAT ARE AVAILABLE TO PAWC’S CENTRAL PA OPERATIONS AS A**
15 **SUBSIDIARY OF AMERICAN WATER.**

16 **A.** As a subsidiary of American Water, PAWC has available to it the resources of American
17 Water Works Service Company, Inc. (the “Service Company”). The Service Company
18 provides access to highly trained professionals with expertise in various specialized areas
19 who work exclusively for American’s operating subsidiaries. Moreover, American Water
20 currently owns or operates approximately 200 wastewater operations through its
21 subsidiaries in a number of states. A 50-person team of Service Company engineers has
22 handled a wide variety of system evaluations, selecting treatment processes and
23 establishing critical design criteria for water and wastewater treatment systems in order to

1 improve operations and prioritize capital improvements. When operational issues arise at
2 individual facilities owned by PAWC, the Company will mobilize engineering talent
3 from its central engineering team, drawing on, as necessary, resources from the Service
4 Company team, to evaluate conditions, identify the potential problems, suggest options,
5 and develop action plans for either operational and/or facility improvements.

6 **Q. WOULD YOU PLEASE EXPLAIN PAWC'S COMMITMENT TO RETAIN THE**
7 **CURRENT BNC SYSTEM EMPLOYEES?**

8 **A.** Yes. As discussed in the direct testimony of Bernard J. Grundusky, PAWC has
9 committed in Section 6.9 of the Asset Purchase Agreement, dated May 5, 2016, ("APA")
10 to offer employment to the BNC System's four employees. Their employment would
11 begin upon closing of the Transaction and be subject to PAWC's standard background
12 checks and drug screening.

13 **Q. WILL THERE BE ANY UNNECESSARY DUPLICATION OF SERVICES AS A**
14 **RESULT OF RETAINING ALL PAWC AND BNC EMPLOYEES?**

15 **A.** No. PAWC's commitment to employ the BNC System's active employees will assure
16 continued quality service to customers and effective operations of the System post-
17 closing.

18 **Q. WHAT EFFORTS, IF ANY, WILL PAWC UNDERTAKE TO EDUCATE**
19 **CUSTOMERS REGARDING PAWC'S OWNERSHIP OF THE SYSTEM?**

20 **A.** As the Transaction is nearing closing, PAWC is coordinating communications with BNC
21 officials, including plans for BNC to mail letters to each resident explaining the

1 transition, billing, payment schedules and other items associated with the change in
2 ownership. Promptly after the closing of the Transaction, PAWC will send letters to all
3 new wastewater customers to announce that the Transaction is final and to provide
4 information related to customer service center hours and phone number, rates and billing.

5 **Q. WHAT BENEFITS OR ENHANCEMENTS TO CUSTOMER SERVICE CAN THE**
6 **BNC CUSTOMERS EXPECT AS A RESULT OF THE TRANSACTION?**

7 **A.** PAWC prides itself on providing superior customer service. As part of its commitment
8 to customer service, PAWC offers its customers a number of enhanced services,
9 including extended call center hours, rapid response to emergency situations, additional
10 bill payment options, enhanced customer information and education programs, and access
11 to PAWC's low-income customer assistance program.

12 **Q. CAN YOU PLEASE PROVIDE ADDITIONAL DETAIL ON EACH OF THESE**
13 **CUSTOMER SERVICE ENHANCEMENTS?**

14 **A.** Yes. *Customer Service.* Our call center is available from 7:00 a.m. to 7:00 p.m.,
15 Monday through Friday for routine service and billing questions. In addition, customer
16 service representatives are available 24 hours a day, seven days a week to respond to
17 water and wastewater emergencies. Customers can also reach a customer service
18 representative via email at infopa@amwater.com. In addition, our customers have the
19 ability to manage their account via PAWC's "My H2O Online" self-service web portal.
20 Customers can also access "My H2O Online" to sign up for alerts via PAWC's
21 emergency notification system, called CodeRED. PAWC deploys the system to alert
22 customers of water and wastewater emergencies, and customers have the option to be

1 notified via phone, email or text. All of these tools offer very responsive service to our
2 customers to address any issues they may have, and will provide the same responsive
3 approach to the BNC’s customers once PAWC acquires the System.

4 ***Bill Payment Options.*** PAWC offers a number of bill payment options.
5 Customers have the option to receive paper bills through the mail or go paperless and
6 receive their bills electronically via the “My H2O Online” web portal. Customers have
7 the option of paying their bill by mail, online, or over the telephone with a debit or credit
8 card. In addition, they can pay by e-check or an electronic funds transfer from their
9 checking or savings account (which can be set up through the “My H2O Online” portal),
10 or pay in person at multiple authorized payment locations across the state.

11 ***Customer Information and Education Programs.*** PAWC provides extensive
12 customer information and education programs that will be available to BNC’s current
13 customers through brochures, bill inserts, and educational videos posted on PAWC’s
14 website and social media sites, which include Facebook, Twitter, YouTube and
15 Instagram. These communication tools cover a wide range of customer education topics,
16 including how to dispose of fats, oils and greases to avoid sewage backups and
17 overflows, how to prevent frozen pipes, detecting and fixing household leaks, how to
18 properly dispose of unused pharmaceuticals to keep them out of the wastewater system,
19 water conservation techniques, watershed protection, and how homeowners can protect
20 themselves from utility imposters.

21 ***Customer Assistance Programs.*** Finally, BNC’s customers will have access to
22 PAWC’s low-income customer assistance program called the “H2O Help to Others

1 Program.” For qualified wastewater customers, this program offers two main benefits:
2 (1) grants of up to \$500 per year; and (2) a 15% discount on total wastewater charges.
3 Additionally, customers who qualify for the program may also receive a water-saving kit
4 which includes, among other things, a low-flow shower head and low-flow faucet
5 aerators.

6 PAWC’S TECHNICAL FITNESS

7 **Q. DO YOU BELIEVE PAWC HAS THE ABILITY TO PROVIDE SAFE,**
8 **ADEQUATE, AND RELIABLE WASTEWATER SERVICE TO THE BNC’S**
9 **CUSTOMERS?**

10 **A.** Yes.

11 **Q. PLEASE PROVIDE AN OVERVIEW OF PAWC’S SCOPE OF OPERATIONS.**

12 **A.** PAWC is part of American Water Works Company, Inc. (“American Water”), the largest
13 publicly traded water service company in the United States, with a history extending 130
14 years. Through its various subsidiaries, American Water provides approximately 15
15 million people with regulated and market-based drinking water, wastewater, and other
16 water-related services in 47 states and parts of Canada. Currently, PAWC provides water
17 service to 653,126 customers and wastewater service to 21,306 residential, commercial,
18 industrial, municipal and bulk customers. These services are provided in 400
19 communities across the Commonwealth with a combined population of approximately
20 2,300,000. As a public utility operating in Pennsylvania, PAWC operates under the rules
21 and regulations of the Commission which, in addition to regulating specific aspects of

1 service, approves the rates charged for water and wastewater service. PAWC must also
2 meet standards established by DEP and EPA.

3 The Company employs approximately 1,000 people who have expertise in all
4 areas of water and wastewater utility operations including engineering, water quality,
5 operations, maintenance, materials management, risk management, human resources,
6 legal, finance and accounting. PAWC currently operates 15 wastewater treatment plants
7 in Pennsylvania. Together, PAWC and other American Water regulated subsidiaries, as
8 well as American Water's market-based subsidiary, American Water Enterprises
9 ("AWE"), currently own or operate 200 wastewater operations, including 54 wastewater
10 treatment plants utilizing Biological Nutrient Removal technology.

11 **Q. PLEASE PROVIDE AN OVERVIEW OF THE SCOPE OF PAWC'S EXISTING**
12 **WATER OPERATIONS FACILITIES IN THE CENTRAL PA OPERATIONS.**

13 **A.** PAWC owns, operates, and maintains five water treatment plants, nine wells, as well as
14 pumping stations, valves, approximately 4,000 fire hydrants, and approximately 1,204
15 miles of pipe to provide reliable water service to our Central PA area water customers.
16 PAWC's existing service territory for water includes the New Cumberland Borough
17 which is managed through the Mechanicsburg District. Locally, the water
18 Mechanicsburg District services customers in all or portions of New Cumberland
19 Borough, Camp Hill Borough, Lemoyne Borough, Wormleysburg Borough,
20 Shiresmantown Borough, Hampden Township, Silver Spring Township, Lower Allen
21 Township, East Pennsboro Township, and Upper Allen Township in Cumberland County
22 and Fairview Township and Newberry Township in York County. As of June 30, 2016,

1 our water Mechanicsburg District serves approximately 39,111 customers and an
2 estimated population of 97,500. To provide reliable water service to our customers in the
3 Mechanicsburg District, PAWC owns, operates, and maintains two water treatment
4 plants, as well as pumping stations, valves, more than 2,185 fire hydrants, and
5 approximately 515 miles of pipe.

6 **Q. PLEASE PROVIDE AN OVERVIEW OF PAWC’S EXISTING WASTEWATER**
7 **OPERATIONS FACILITIES IN THE CENTRAL PA OPERATIONS.**

8 **A.** PAWC owns, operates, and maintains three wastewater treatment plants, one lagoon
9 wastewater treatment system, as well as 19 pumping stations, and approximately 82 miles
10 of pipe in our collection systems to provide reliable wastewater service to our Central PA
11 area wastewater customers.

12 **Q. DOES PAWC MAINTAIN CYBER SECURITY, PHYSICAL SECURITY,**
13 **BUSINESS CONTINUITY, AND EMERGENCY PLANS?**

14 **A.** Yes. Cyber and physical security plans are maintained and monitored by American
15 Water for each of its subsidiaries. PAWC maintains emergency response plans and
16 Operations and Maintenance (“O&M”) Manuals, both of which have operational business
17 continuity included within the plans, and are updated each year. These plans are tested
18 each year through emergency response tabletop exercises. Each of the plans are overseen
19 and managed by various groups and individuals to provide overarching support to
20 PAWC. These groups are responsible for testing, reviewing, and updating their
21 respective plan(s). The departments assigned to Physical Security, Emergency Response,
22 Business Continuity, and Cyber Security plans are as follows:

- 1 • Physical Security Plan – Operational Risk Management Security (AWWSC)
- 2 • Cyber Security Plan – Operational Risk Management Security (AWWSC)
- 3 • Emergency Response Plan – Operations (PAWC)
- 4 • Business Continuity Plan – Operational Risk Management (PAWC) and
- 5 Operations (PAWC)

6 To constantly protect physical and cyber resources, the designated groups have
7 developed procedures to ensure that PAWC operates in a safe, secure, and reliable
8 environment. A major commitment in assuring plans are kept current is performing
9 various testing on an annual basis. Types of testing performed by AWWSC and PAWC
10 include vulnerability assessments, system operational testing, full scale exercises, media
11 backups, and real-life events.

12 **Q. PLEASE DESCRIBE PAWC’S RELATIONSHIPS WITH COMMISSION**
13 **EMERGENCY RESPONSE STAFF, PENNSYLVANIA EMERGENCY**
14 **MANAGEMENT AGENCY STAFF, AND LOCAL FIRST RESPONDERS.**

15 **A.** PAWC has a strong working relationship with the Commission’s Emergency Response
16 Staff. PAWC provides the Commission with emergency response numbers for all PAWC
17 operating areas each year. The Commission provides emergency numbers for its staff,
18 which PAWC sends out to all of PAWC’s operating areas for inclusion in the PAWC
19 Emergency Response Plans. For those emergencies that warrant communication to the
20 Commission’s Emergency Preparedness Liaison Officer (“EPLO”), PAWC has contacted
21 Commission staff numerous times in the past to advise of situations and actions taken by

1 PAWC. Each year PAWC conducts emergency response tabletop exercises to test
2 response to emergency situations, including weather emergencies, contamination of
3 supply, damage to facilities, cyber attack, and other perils. The Commission's
4 emergency response staff has participated in those exercises each year since 2006. We
5 also invite local first responders to participate, such as fire departments, police
6 departments, hazmat responders, local prison personnel, as well as DEP, and
7 Pennsylvania Department of Homeland Security ("DHS") personnel. PAWC has
8 participated, through the Pennsylvania Water/Wastewater Agency Response Network
9 ("PaWARN") organization, in Pennsylvania Emergency Management Agency ("PEMA")
10 sponsored exercises over the years. Our current relationship with PEMA is through the
11 Commission EPLO and the PaWARN organization.

12 **Q. PLEASE DESCRIBE PAWC'S PARTICIPATION IN PENNSYLVANIA'S "ONE**
13 **CALL" SYSTEM AND THE RESOURCES THAT PAWC DEDICATES TO THE**
14 **PROGRAM.**

15 **A.** All of PAWC's 36 districts are members of Pennsylvania One Call System Inc. and
16 complete excavator requested mark outs on a daily basis. Each district has at a minimum
17 of one personnel dedicated to completing dig notifications utilizing a third party internet-
18 based One Call ticket management system known as Korweb that is accessible via
19 vehicle mounted computers for real time response to any One Call dig notification.

20 **Q. DOES PAWC HAVE AN EMPLOYEE SAFETY PROGRAM?**

21 **A.** Yes. Employee health and safety is a critical consideration within PAWC, and safety
22 performance is fundamental to the Company's culture and key to its success. Employees

1 are expected to conduct themselves in a safe manner, in accordance with our Health &
2 Safety policy and with the Health and Safety Procedures and Practices Manual. PAWC
3 establishes, implements, promotes and manages safety programs, activities and training
4 that enable continued safety improvement, injury reduction and compliance with
5 applicable Federal, State and local requirements. Safety programs are developed in
6 accordance with Company policy and applicable practices and include:

- 7 • Supporting practices that are developed, reviewed and updated to provide
8 guidance on safe performance of activities in the workplace and are reflective of
9 changes in organizational, operational and regulatory needs;
- 10 • Strategy and priority development and implementation of safety improvements
11 based on risk analysis of work places, work tasks and related potential injuries
12 and incidents;
- 13 • Development of, and measurement against, specific Company and external safety
14 performance targets and safety accountabilities for all employees;
- 15 • Ongoing assessment and review of safety processes, activities and supporting
16 programs (including those related to other Company policies, such as the
17 Workplace Conduct and Behavior Policy) to gauge effectiveness, identify
18 program gaps and pinpoint opportunities for continued improvement;
- 19 • Consistency of implementation and compliance with Company and regulatory
20 requirements across the enterprise; and,

- 1 • Defined and monitored contractor qualifications and requirements for safety
2 performance in accordance with approved contract documents, applicable laws
3 and regulations.

4 **Q. PLEASE DESCRIBE PAWC’S CUSTOMER DISPUTE RESOLUTION**
5 **PROCEDURE?**

6 **A.** PAWC is governed by Chapter 14 of the Public Utility Code, Responsible Utility
7 Customer Protection Act, 66 Pa. C.S.A. § 1401 *et al.*, and the Commission’s regulations
8 commonly known as Chapter 56, 52 Pa. Code § 56 *et al.* This law and Commission
9 regulations provide the process and procedures for customer billing, collections, payment
10 arrangements, medical certifications, Protection from Abuse Orders, termination of
11 service, reconnection of service, and customer dispute resolution procedures. PAWC has
12 a customer compliance team located in the Hershey office responsible for ensuring that
13 customer disputes are resolved in compliance with the Commission’s regulations.
14 Additionally, the Company has a customer advocacy team located in the Hershey office
15 responsible for addressing any customer disputes and escalated concerns.

16 **Q. DOES PAWC HAVE A PROGRAM TO PROTECT ITS CUSTOMERS AGAINST**
17 **UTILITY EMPLOYEE IMPOSTERS?**

18 **A.** Yes, PAWC has developed communications tools and programs to regularly educate
19 customers about the tactics used by utility employee imposters and what homeowners
20 need to know to protect themselves. The communications vehicles include bill inserts,
21 news releases, social media posts and website information about imposter-related crimes
22 and precautions that customers can take. In addition, PAWC helped form the Keystone

1 Alliance to Stop Utility Imposters, a coalition of water, gas and electric utilities, along
2 with the Commission, Pennsylvania District Attorneys Association and Pennsylvania
3 Chiefs of Police Association, to launch a public awareness campaign using public service
4 announcements, print materials, posters and community presentations.

5 **CONCLUSION**

6 **Q. DO YOU HAVE ANY DOUBT ABOUT PAWC'S TECHNICAL FITNESS TO**
7 **OWN AND OPERATE THE BNC SYSTEM IN THE PUBLIC INTEREST?**

8 **A.** No. We run wastewater systems like the BNC System on a daily basis and have greater
9 operational resources than any other investor-owned water and wastewater utility in the
10 Commonwealth.

11 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

12 **A.** Yes. However, I reserve the right to supplement my testimony as additional issues and
13 facts arise during the course of the proceeding. Thank you.