



# The York Water Company

America's Oldest Publicly Traded Company

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PA PUC  
SECRETARY'S BUREAU

May 8, 2017

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

**Re: Focused Management and Operations Audit of The York Water Company (D-2014-2409384). Implementation Progress Report.**

Dear Secretary:

Since the Pennsylvania Public Utility Commission released its Focused Management and Operations Audit of the York Water Company in May, 2015, my team and I have moved forward with implementation of your Audit Staff's recommendations. As detailed in the enclosed implementation progress report, all recommendations are fully implemented, though several remain a work in progress as we refine processes to maximize the benefit for our customers. The enclosed reflects progress made through the end of April, 2017 to provide you and your staff the most accurate summary of progress to date.

I appreciate the opportunity to work with your Audit Staff and their continued assistance through this process. If you or a member of your staff has any questions or concerns regarding this report please contact me directly at 717-718-2953 or email [jeffh@yorkwater.com](mailto:jeffh@yorkwater.com).

Sincerely,

Jeffrey R. Hines, P.E.  
President and Chief Executive Officer

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PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU



THE YORK WATER COMPANY  
PUC FOCUSED MANAGEMENT AND OPERATIONS AUDIT  
ANNUAL MAY 1<sup>ST</sup> PROGRESS REPORT OF  
IMPLEMENTATION PLAN FOR AUDIT D-2014-2409384

Chapter Number: V – Financial Management

Recommendation Number: V-1, Pg. 23

Benefit/Time: Low, 0-6 months

Recommendation:

Implement cross-subsidization safeguards between the Water Service Line Protection Program (WSLPP) and regulated utility service by maintaining separate accounts, allocating all expenses, and including additional language in WSLPP's disclaimer.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** Separate below-the-line accounts have already been set up for the WSLPP. We will insure that all material personnel and resource costs involved in the WSLPP are allocated to the proper accounts.

**Individual Responsible:** Kathy Miller

**Date recommendation is to be implemented:** Completed on April 1, 2015

**April 30, 2017 annual update: (No change from last year)** Separate below-the-line accounts for income and expense were set up and used consistently. In addition, YWC added verbiage to the terms and conditions indicating that the WSLPP was not regulated by the PA Public Utility Commission, and that failure to pay under the WSLPP would not affect water or wastewater service.

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Chapter Number: VI – Water Operations

Recommendation Number: VI – 1, pg. 37

Benefit/Time: Low, 0-6 months

Recommendation:

Update the Drought Contingency Plan.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** The Drought Contingency Plan will be updated

**Individual Responsible:** John Strine

**Date recommendation is to be implemented:** August 1, 2015

**April 30, 2017 annual update: (No change from last year)** The Drought Contingency Plan was reviewed, updated, and filed with PaDEP on December 16, 2015.



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Chapter Number: Chapter VI – Water Operations

Recommendation Number: VI - 2

Benefit/Time: Medium, 0-6 months

Recommendation:

Develop a distribution valve inspection manual and/or policy.

**YORK WATER RESPONSE:**

The recommendation is fully accepted. The York Water Company has an active and aggressive valve maintenance program and maintains all records of inspections, however, there is no single manual that incorporates all of the inspection requirements and procedures.

**Action to be Taken:** The Company will develop a valve inspection manual and procedure that outlines the current valve exercise and maintenance program.

**Individual Responsible:** John Strine

**Date recommendation is to be implemented:** July 1, 2015

**April 30, 2017 annual update: (No change from last year)** A comprehensive valve maintenance Policy and Procedure has been developed and has been in place since May 2015.



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Chapter Number: Chapter VI – Water Operations

Recommendation Number: VI- 3

Benefit/Time: Medium, 0-12 months

Recommendation:

Update the cross connection control program manual and incorporate administrative controls to ensure testing for commercial and industrial customer backflow devices is completed.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** York Water has a highly effective and fully implemented cross connection control program. However, the current cross connection control manual needs to be updated. A study will be completed on how to best incorporate administrative controls to ensure testing is completed.

**Individual Responsible:** John Strine

**Date recommendation is to be implemented:** September 1, 2015

**April 30, 2017 annual update:** Complete. Manual is complete, administrative controls are documented and in place and a link with our customer database to ensure compliance is in place.



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**IMPLEMENTATION PLAN FOR AUDIT D-2014-2409384**

Chapter Number: Chapter VI – Water Operations

Recommendation Number: VI - 4

Benefit/Time: Medium, 0-12 months

Recommendation:

Develop an electronic meter record database and a meter testing policy and/or procedure.

**YORK WATER RESPONSE:**

The recommendation is fully recommended.

**Action to be Taken:** York Water currently has a thorough meter testing policy. However, the company will update a meter testing procedure that outlines the current meter testing program. A study will be completed on how to best incorporate an electronic meter record database into our database system.

**Individual Responsible:** John Strine

**Date recommendation is to be implemented:** November 1, 2015

**April 30, 2017 annual update:** Complete with the exception of a link to customer data base. The current database in Excel is by month and searchable for specific information. A sample of the information gathered is below. After evaluation, adding the link to the customer database did not appear to add any additional value beyond the Excel database. Will continue to review to determine is any value is gained by adding to customer database.

| METER SIZE | METER NUMBER | METER MODEL  | LOW % | MED % | HIGH % | REMOVED ADDRESS | Date Tested | Comments |
|------------|--------------|--------------|-------|-------|--------|-----------------|-------------|----------|
| 2          | 30772769     | Neptune T-10 | 100   | 101   | 100    | 210 York St     | 11/1/2016   |          |



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Chapter Number: Chapter VI – Water Operations

Recommendation Number: VI - 5

Benefit/Time: Medium, 0-12 months

Recommendation:

Develop a comprehensive damage prevention program manual.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** York Water agrees that although a “damage prevention program manual” is not required, we agree with Commission staff that a written comprehensive damage prevention program should be put into place.

**Individual Responsible:** JT Hand

**Date recommendation is to be implemented:** December 1, 2015

**April 30, 2017 annual update:** The final format of the manual is being developed. We are working with our insurance carrier for ideas they may have for a suitable format that may also work for them in assessing the company processes and procedures for loss prevention.



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Chapter Number: Chapter VIII – Purchasing/Materials Management

Recommendation Number: VIII - 1

Benefit/Time: Medium, 0-12 months

Recommendation:

Establish inventory reorder points and formalize the use of minimum/maximum levels in the Inventory Management System.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** York Water currently utilizes a manual inventory control program. A study will be completed to determine the ability and the costs/benefits to use minimum/maximum levels in our current inventory system efficiently.

**Individual Responsible:** John Strine

**Date recommendation is to be implemented:** December 1, 2015

**April 30, 2017 annual update: (No change from last year)** Reorder points have been established on an item by item basis and our initial analysis determined that a fully automated minimum/maximum reorder feature for our levels of inventory would actually increase the inventory carrying costs and potentially decrease parts availability which could hinder the provision of service. However, the Company is using a combination automated reorder system. When an item is taken out of inventory it shows remaining number in our inventory management system and reordering takes place based on that number. In addition, to reduce costs and maintain a high level of service, we routinely monitor heavily used items to ensure sufficient stock is on hand.



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Chapter Number: Chapter VIII – Purchasing/Materials Management

Recommendation Number: VIII - 2

Benefit/Time: High, 0-6 months

Recommendation:

Classify designated emergency stock in the Inventory Management System.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** York Water currently lists emergency stock on an Excel Spreadsheet. A study will be completed on the feasibility, costs, and benefits of designating emergency stock in the Inventory Management System.

**Individual Responsible:** John Strine

**Date recommendation is to be implemented:** September 1, 2015

**April 30, 2017 annual update: (No change from last year)** The Company completed its initial evaluation of options. After review with Information Technology Department, the Company has determined that the current method of designating emergency stock in an Excel spreadsheet continues to be the best solution for handling emergency stock. We will monitor this process over the next year, re-evaluate the costs and benefits of inserting this information into our Inventory Management System and update as necessary.



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Chapter Number: Chapter VIII – Purchasing/Materials Management

Recommendation Number: VIII - 3

Benefit/Time: High, 0-6 months

Recommendation:

Implement a cycle counting procedure and reduce inventory count variances.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** In addition to the current annual inventory count, a cycle counting procedure will be developed and implemented.

**Individual Responsible:** John Strine

**Date recommendation is to be implemented:** October 1, 2015

**April 30, 2017 annual update:** (No change from last year) Cycle counts on selected inventory items are completed monthly.



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Chapter Number: Chapter IX – Customer Service

Recommendation Number: IX - 1

Benefit/Time: Medium. 12+ months

Recommendation:

Perform periodic customer satisfaction surveys.

**YORK WATER RESPONSE:**

The recommendation is fully accepted

**Action to be Taken:** York Water generally hires a consultant to provide a customer survey every 4-5 years. Earlier this year the Company hired Polk-Lepson Associates to conduct the survey. The survey was completed by April 1, 2015 and results should be received by June 1, 2015.

**Individual Responsible:** Jeff Hines

**Date recommendation is to be implemented:** June 1, 2015.

**April 30, 2017 annual update: (No change from last year)** Customer Service survey was completed in 2015 and management continues to evaluate and use the results to improve customer service.



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Chapter Number: Chapter IX – Customer Service

Recommendation Number: IX - 2

Benefit/Time: Low, 0-12 months

Recommendation:

Investigate and evaluate the feasibility of an Interactive Voice Response system and implement call reporting software.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** York Water is currently working with telephone and network vendors to procure and install an updated phone system with IVR and call reporting capabilities and conduct a study of the costs/ benefits of full implementation of the features of the system.

**Individual Responsible:** JT Hand

**Date recommendation is to be implemented:** October 1, 2015

**April 30, 2017 annual update: (No change from last year)** The Company completed installation of a new VOIP telephone system in June 2015 that offers significantly better reporting mechanisms. In addition to better metrics to evaluate call volumes, hold times, transfer times and dropped calls, the networked phone system allows customers to access an employee listing and more easily direct calls to the appropriate staff member. There is an IVR component to the system, through which customers can pay their water and wastewater bills telephonically.



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Chapter Number: Chapter IX – Customer Service

Recommendation Number: IX - 3

Benefit/Time: Medium, 0-12 months

Recommendation:

Reduce billing lag to more reasonable levels.

**YORK WATER RESPONSE:**

The recommendation is partially accepted and partially rejected pending further study.

**Action to be Taken:** York Water agrees with Audit Staff that a reduced billing lag has some benefits. We do not believe an average lag as low as 2 days billing lag is feasible while still providing our current validation procedure that helps us maintain one of the lowest complaint rates in the state. Our average billing lag, as calculated by the PUC auditors, of 7.4 days likely included weekends and holidays. Our calculation of billing lag without weekends and holidays produces an average billing lag of 6.0 days. We have worked to improve our billing lag significantly over the past few years and believe we are very efficient, however we will continue to review ways to reduce lag.

As Audit Staff has stated, we agree that there are minimal cash flow benefits during the current low interest rate environment. As far as being able to mail the bills that passed validation immediately and just hold those that did not, we have the following issues:

1. Our billing programs would have to be modified to allow for multiple processing of the same billing cycle.
2. We would have to schedule more than one mail pick up for each cycle, increasing costs.
3. We would incur more postage cost as a result of breaking the cycle into smaller parts not qualifying for bulk mail rates.
4. We would create uncertainty with our customers regarding the day of the month they receive their bills. This would also increase our customer service costs responding to customer inquiries about bill timing.
5. The Audit Staff's billing lag analysis does not take into account that all of York Water's bills are mailed from our office in York and not from an out-of-state mail processing facility. We believe this gets the bill into the customer's hands 1-3 days faster than an out of state mail processing facility.

By not mailing all bills at the same time, there is more likelihood of something falling through the cracks during the process, more confusion caused by potentially working on two cycles at the same time, and inconsistency of billing dates, mailing times, etc. for customers in the same cycle, causing more confusion for our customers and our customer service.

York Water will agree to continue to look at the customers within a given billing cycle, and make sure that we have our meter reading routes optimized for efficiency. York Water will also continue to look at fixed reading systems and other new technology to make fully automated reading system even more efficient. York Water will investigate the benefits of mailing bills from our own facility and quantifying the reduction in bill lag. Finally, York Water will conduct a cost/benefit study and analysis to determine the costs and consequences of the billing lag compared to our peers.

**Individual Responsible:** Kathy Miller

**Date recommendation is to be implemented:** February 1, 2016



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**April 30, 2017 annual update: (No change from last year)** We have reviewed our meter reading and billing process and identified the system and resource constraints that prevent us from reducing our billing lag. These constraints will be discussed at an upcoming IT Steering Committee meeting. Our IT Department is currently working on automating the closing of work orders which should help with one of the constraints. Several other of the smaller constraints are also on the IT Issues List to be worked on, however, they will not reduce the lag substantially.

We have deployed several fixed reading systems, primarily at our more remote locations in order to reduce travel time and costs by meter readers. A large portion of our billing lag involves some of our less remote locations, such as the city. The Company commissioned a propagation study by the meter reading system provider to see what it would take to install a fixed system in our largest area in order to get all reads. The vendor recently came back to us and said it would take 3 fixed collectors and upgraded MIU's for each property. The Company plans to discuss whether or not this upgrade would be cost-effective and help the billing lag.

We prefer to mail our bills from our own facility so that we can review them if needed before they go out, and so that we have complete control over them and know exactly when they have been mailed. We also believe that mailing bills from York actually reduces the amount of time that bills are received by customers when compared to a contracted billing system where bills are mailed from several states away. We do not currently have second and third shift billing, printing and mailroom personnel. The Company will continue to review whether modifying work hours would be beneficial.



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Chapter Number: Chapter X – Fleet Management

Recommendation Number: X - 1

Benefit/Time: Low, 0-12 months

Recommendation:

Document authorized users/passengers within the vehicle use policy.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** A written authorized users/passengers section within the vehicle use policy will be implemented.

**Individual Responsible:** Bruce McIntosh

**Date recommendation is to be implemented:** September. 1, 2015

**April 30, 2017 annual update: (No change from last year)** Updated the Vehicle Use policy in April 2016 explaining the procedure regarding the transportation of non-employee passengers in Company vehicles.



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Chapter Number: Chapter XI – Human Resources and Diversity

Recommendation Number: XI - 1

Benefit/Time: High, 0-6 months

Recommendation:

Strive to achieve industry average or better Occupation Safety and Health Administration incidence rates by monitoring and continually modifying safety programs to address the most current safety issues.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** York Water agrees that improvements in safety will benefit the Company and its employees, contractors, and the public. York Water will continue to strive to achieve industry average or better Occupation Safety and Health Administration incidence rates by monitoring and continually modifying safety programs to timely address current and upcoming safety issues.

**Individual Responsible:** Bruce McIntosh

**Date recommendation is to be implemented:** September 1, 2015

**April 30, 2017 annual update:** 2014-2016 showed a marked improvement in the Company’s overall safety record. YWC is unable to identify the source of the PUC’s OSHA averages.

York Water Total Workers Compensation Cost For Medical Treatment and Lost Time Payments Per Year

| 2009   | 2010   | 2011    | 2012    | 2013    | 2014   | 2015  | 2016   |
|--------|--------|---------|---------|---------|--------|-------|--------|
| 11,095 | 19,259 | 103,006 | 166,046 | 140,182 | 27,089 | 4,739 | 17,657 |

| <b>Recordable Incidence Rate</b> | <b>2009</b> | <b>2010</b> | <b>2011</b> | <b>2012</b> | <b>2013</b> | <b>2014</b> | <b>2015</b> | <b>2016</b> |
|----------------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
| York Water - Actual              | 6.06        | 8.97        | 6.19        | 14.68       | 8.09        | 5.13        | 5.22        | 4.42        |
| OSHA - Average                   | 6.60        | 5.30        | 6.10        | 6.00        | 2.90        |             |             |             |
| <b>Lost Time Incidence Rate</b>  | <b>2009</b> | <b>2010</b> | <b>2011</b> | <b>2012</b> | <b>2013</b> |             |             |             |
| York Water - Actual              | 1.73        | 0.00        | 2.65        | 4.89        | 0.90        | 2.57        | 1.74        | 0           |
| OSHA - Average                   | 2.50        | 1.70        | 1.80        | 1.30        | 1.00        |             |             |             |
| <b>DART Rate</b>                 | <b>2009</b> | <b>2010</b> | <b>2011</b> | <b>2012</b> | <b>2013</b> |             |             |             |
| York Water - Actual              | 1.73        | 4.98        | 4.42        | 10.76       | 7.19        | 3.42        | 3.48        | 2.65        |
| OSHA - Average                   | 3.60        | 3.20        | 4.10        | 3.90        | 1.60        |             |             |             |



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Chapter Number: Chapter XI – Human Resources and Diversity

Recommendation Number: XI - 2

Benefit/Time: Medium, 0-12 months

Recommendation:

Develop and update Human Resources policies and procedures.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** York Water has a fully implemented system of Human Resource policies and procedures. However, some of those policies were determined to need updating. All policies will be reviewed and updated as needed.

**Individual Responsible:** Bruce McIntosh

**Date recommendation is to be implemented:** December 1, 2015

**April 30, 2017 annual update: (No change from last year)** Updated General and Administrative and Union employee handbooks were distributed to all employees in April of 2015. The department reviewed and updated all Human Resources policies and procedures by December of 2015.



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Chapter Number: Chapter XI – Human Resources and Diversity

Recommendation Number: XI - 3

Benefit/Time: Medium, 0-12 months

Recommendation:

Reduce manual operating aspects of the Human Resource function by fully utilizing the capabilities of the Human Resource Information System.

**YORK WATER RESPONSE:**

The recommendation is fully accepted.

**Action to be Taken:** Although there are certain automated functions within the Oracle software, York Water does not currently utilize these functions fully. York Water will conduct a study and cost/benefit analysis to determine which of these automated functions should be implemented.

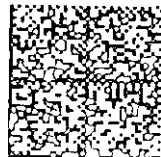
**Individual Responsible:** Kathy Miller

**Date recommendation is to be implemented:** January 1, 2015

**April 30, 2017 annual update:** We looked into the possibility of each department keying in their own timesheets to the Oracle system in order to prevent duplicate keying by each department in Excel and the Bookkeeper in Oracle. With the assistance of the IT Department, we determined that having the departments key in their own timesheets to Oracle was even more time-consuming than having the Bookkeeper key them all in. We have instead decided to eliminate the keying by the Bookkeeper by performing an automatic upload to Oracle from the Excel spreadsheets keyed by each department. This was completed during 2016.

# The York Water Company

130 EAST MARKET STREET, BOX 15089  
YORK, PENNSYLVANIA 17405-7089



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