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June 8, 2020

**VIA ELECTRONIC FILING**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building, 2<sup>nd</sup> Floor  
Harrisburg, PA 17120

**Re: The Pittsburgh Water and Sewer Authority's Response to the Pennsylvania Public Utility Commission's Secretarial Letter Regarding COVID-19 Customer Service, Billing, and Public Outreach Provisions Request for Utility Information at Docket No. M-2020-3020055**

Dear Secretary Chiavetta:

The Pittsburgh Water and Sewer Authority respectfully submits the attached Response to the above captioned matter.

Very truly yours,

*/s/ Shannon F. Barkley* \_\_\_\_\_

Shannon F. Barkley  
Pa. Attorney Id. # 81501

Enclosures

cc: Sarah Dewey, Commission's Bureau of Consumer Services (BCS)  
Tom Charles, Commission's Office of Communications

**The Pittsburgh Water and Sewer Authority's Response to the Pennsylvania Public  
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**I. COVID-19 Utility Consumer Service and Billing Policies and Procedures**

Describe and report efforts to support customers through initiatives in customer service and billing policies and procedures in response to the COVID-19 pandemic and the ensuing recovery period. Explain how these initiatives differ from normal operations:

**Termination of Utility Service:**

**Request**

- After the Commission's Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment?
  - How does the utility plan to implement terminations and will it start the process with new termination notices?

**PWSA Response**

The Pittsburgh Water and Sewer Authority (PWSA) has been issuing Friendly Reminder letters to delinquent customers in May 2020 and thus far in June 2020. This is the first stage in our collections process. PWSA intends to issue termination notices to delinquent customers, which will be new termination notices in the form of 10-day letters and subsequent 3-day posting notices, with 37-day letters to landlords and 30-day posting notices to tenants.

**Request**

- Broken out by customer class, how many customer accounts may be subject to termination if the Commission's Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?
  - Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.
  - Provide future projections if available.

**PWSA Response**

If the Commission's Emergency Order prohibiting terminations is rescinded, 8,873 Residential accounts and 613 Non-Residential accounts may be subject to termination. In this same period in 2019, PWSA issued termination notices to

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4,289 Residential accounts and 245 Non-Residential accounts. PWSA did not track which of these customers were receiving the Bill Discount.

**Request**

- Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

**PWSA Response**

In accordance with PWSA’s Water Tariff and the Supplemental Service Conditions contained therein, “...service shall be turned on by the Authority only upon the payment by the customer of a turn-on charge....” This charge is added to the account and is collected prior to reconnection of service. This charge has not been added to the account of any customer reconnected in response to the Commission’s Emergency Order.

**Universal Service Programs:**

**Request**

- Is the utility currently removing customers from CAP for non-payment or failure to recertify?

**PWSA Response**

Although there is no regulation requiring a water and wastewater utility to have a Universal Service Program, PWSA does offer a Bill Discount as part of its customer assistance programs. Due to PWSA’s response to COVID-19, PWSA’s Board of Directors passed a resolution that includes a waiver of the recertification process for the Bill Discount Program throughout 2020.

**Request**

- What are the utility’s current Hardship Fund payment requirements to qualify low-income customers for grants (e.g., waiving payment history “good faith payment”, or CAP participation criteria) and have these requirements been revised due to the pandemic?

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**PWSA Response**

Although there is no regulation requiring a water and wastewater utility to have a Universal Service Program, PWSA does offer a Hardship Grant as part of its customer assistance programs. Due to PWSA's response to COVID-19, PWSA's Board of Directors passed a resolution that includes a waiver of the sincere effort of payment requirement for the Hardship Grant Program throughout 2020.

**Other Assistance Initiatives:**

**Request**

- Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.

**PWSA Response**

PWSA's Board of Directors passed a resolution on April 24, 2020 that:

1. Extended the Winter Moratorium through July 1, 2020.
2. Waived the Winter Moratorium income eligibility requirement through July 1, 2020.
3. Waived the Bill Discount annual recertification requirement through December 31, 2020.
4. Waived the Hardship Grant program sincere effort of payment requirement through December 31, 2020.

**Request**

- Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor's Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted. Utilities are directed to report this information to Sarah Dewey, [sdewey@pa.gov](mailto:sdewey@pa.gov) in the Commission's Bureau of Consumer Services (BCS), detailing the efforts already in place and thereafter when further changes by the utilities are implemented.

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**PWSA Response**

PWSA's Board of Directors is considering further changes to its customer assistance programs and will be voting on a resolution during their June 26, 2020 meeting to further extend the moratorium on terminations and to continue to waive the income eligibility requirement through August 1, 2020.

**II. Consumer Education and Outreach**

The Commission is specifically interested in how utilities are informing customers of their rights and responsibilities as ratepayers during the COVID-19 pandemic and in determining whether any gaps exist in consumer education and outreach efforts. The Commission directs all jurisdictional electric, natural gas, water, wastewater, and telecommunications utilities to submit to Tom Charles, [thcharles@pa.gov](mailto:thcharles@pa.gov), in the Commission's Office of Communications, the following information, if applicable, regarding consumer education and outreach strategies related to the COVID-19 pandemic and the ensuing recovery period.

**Request**

- Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.
- Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.

**PWSA Response**

PWSA took early action at the onset of the COVID-19 pandemic when in-person outreach ceased to be a viable option of sharing information. PWSA utilized every resource outside of personal contact to make certain that the public was aware of, and continually updated on, actions taken regarding the safety, security, and financial hardships facing our customers.

The actions that PWSA has taken thus far are as follows:

- Email regarding COVID-19 information and changes; issued on March 19, 2020 via Constant Contact to all distribution lists (includes PWSA board

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members, elected officials, media, local community group leaders, and public subscribers) as well as a special email sent to all customers who are enrolled in eBilling: <https://conta.cc/38Zjht3>.

- Press releases:
  - Issued on March 13, 2020, extending the Winter Moratorium until May 31, 2020 and waiving the income eligibility requirement to ensure that no customer is without water service during the pandemic.
  - Issued on April 24, 2020, further extending the Winter Moratorium until July 1, 2020 and also waiving the recertification requirement for the Bill Discount and the sincere effort of payment for the Hardship Grant throughout 2020.
  - Issued on April 28, 2020, “Expanding your Water IQ”, highlighting a new webpage for education and water conservation resources.
  
- Newsletters; articles on the moratorium extensions, customer assistance programs, and water conservation in our March, April, and May 2020 publications.
  
- Bill inserts; articles on the moratorium extensions and customer assistance programs in our April, May, and June 2020 bill inserts that are sent to each customer.
  
- Website content:
  - Enhanced messaging on our Customer Assistance web page to draw attention to the changes to our programs.
  - Created a dedicated webpage for parents and educators to share with children and young adults about water conservation, water quality, and stormwater: <https://www.pgh2o.com/your-water/educational-resources-videos/educational-activities-kids-young-adults>.
  - Created a webpage with water conservation information and tips for customers: <https://www.pgh2o.com/residential-commercial-customers/tips-maintenance-prevention/water-conservation>.
  - Created a dedicated web page on March 20, 2020 with important COVID-19 updates for customers: <https://www.pgh2o.com/covid-19>.

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- Social media; multiple posts are continually sent out several times a week regarding customer assistance programs and enhancements, COVID-19 updates, and educational/water conservation information. Our social media platforms include Twitter, Facebook, LinkedIn, and NextDoor.
- Public webinars:
  - Executive Director Will Pickering spoke about the customer assistance programs and the ways in which we have responded during this pandemic to protect staff and customers in a webinar hosted by Senator Jay Costa on May 7, 2020.
  - Director of Administration Julie Quigley spoke about the customer assistance programs in a webinar hosted by the Pittsburgh Black Elected Officials Coalition on May 21, 2020.
- Public virtual board meetings; to project public health during the COVID-19 pandemic, board meetings have been held via teleconference and are open to the public to call in. Information on how to participate is included on our website and via publication in local newspapers. Accommodations are made for those requesting to make public comments.
- Educational outreach; an “Educational Activities for Kids and Young Adults” webpage was created and shared with the Environmental Charter School in Pittsburgh and administrators at Pittsburgh Public Schools.

**Request**

- Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.

**PWSA Response**

In addition to our public virtual board meetings, PWSA and its outside counsel, Eckert Seamans, are working closely with the PUC Administrative Law Judge to plan, create, and advertise via website and newspaper telephonic Public Input Hearings as required in our rate case.

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**Request**

- Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service.

**PWSA Response**

PWSA could attempt to reach eligible customers via bill insert and outbound call software regarding the Lifeline Program for Telephone and Broadband Internet Service.



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**VERIFICATION**

I, Julie A. Quigley, hereby state that: (1) I am the Director of Administration for The Pittsburgh Water and Sewer Authority (“PWSA”); (2) the facts set forth in these Secretarial Letter responses 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).

Dated: June 8, 2020

*/s/ Julie A. Quigley*

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