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June 15, 2020

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

**Re: COVID-19 Customer Service, Billing, and Public Outreach  
Provisions Request for Utility Information  
Docket No. M-2020-3020055**

Dear Secretary Chiavetta:

West Side Telephone Company-PA offers the following information in response to the request from the Commission in Docket No. M-2020-3020055.

West Side Telephone Company (WST-Pa) serves 23 Customers in the Core, PA area. As of this date, all of these customers have paid their accounts on a timely basis. West Side has implemented the following practices to assist customers during this pandemic.

**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:

Response: WST-Pa has suspended its' disconnect policy during this pandemic, should anyone have difficulty paying their bill. Additionally, the company would work with the customer to put in place a payment plan that would allow the customer to remain connected and repay any past due balances over a reasonable period.

## **Termination of Utility Service:**

- 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?
  - Response: Should the company have customers who have fallen behind on paying, the company would begin to work with the customer to reach agreement on a payment plan not later than 30 days after the end of the Commission's Emergency Order.
- 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many customer accounts may be subject to termination if the Commission's Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?

Response: none in 2020 or 2019

- Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.

Response: N/A

- Provide future projections if available.

Response: Not available

- 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?

Response: The Company normally assesses a "reconnection fee" to customers whose service has been terminated for non-payment. That fee is normally billed to the customer on their next bill. The reconnection fee will not be applied to any customer that may be disconnected during this pandemic.

## **Universal Service Programs:**

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

Response: No

- 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?

Response: West Side follows the guidelines and procedures set forth by USAC/FCC

1. Income and identification documentation requirements have been temporarily adjusted to allow individuals recently unemployed or social distancing due to the pandemic to complete their Lifeline Application more easily.
2. Program integrity reviews, as well as usage, recertification, reverification, and general de-enrollment requirements have been paused through August 31, to ensure consumers are not involuntarily de-enrolled from the Lifeline Program during the pandemic.
3. Access to the National Verifier has been expanded to state agencies, thus assisting consumers with the Lifeline application process during the pandemic.

## **Other Assistance Initiatives:**

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

Response: The Company has waived late fees for customers who are unable to pay their bill by the due date. Additionally any fees associated with changes in services due to working at home are waived.

- 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.

Response: N/A

## II. Consumer Education and Outreach

- 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.  
Response: Annually the Company provides information in the bill regarding the Lifeline support available to customers who meet the criteria. Additionally in situations like the current pandemic the Company will include information in the customer bill that will assist the customer in making an informed decision.
- Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.  
Response: The Company has placed messages on the bill informing customers that bill payment options are available, that various payment options are available such as paying online, using the drop box, paying by phone or mailing a payment, all of which eliminate face to face interaction.
- 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.  
Response: West Side Telephone-PA would employ bill messages, email, posting on the company website and possibly direct mailers to inform the customers of such proceedings.
- 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.  
Response: Customers could be emailed, called, have messages placed on their bill, or see the information on the company website.

If you have any additional questions please contact Leslie Baker, Customer Service Manager at [lbaker@westsidetel.com](mailto:lbaker@westsidetel.com), or the address shown above.

Sincerely



Leslie Baker  
Customer Service Manager