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June 15, 2020

BY ELECTRONIC FILING

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Filing Room
Harrisburg, PA 17120

Re: COVID-19 Customer Service, Billing, and Public Outreach Provisions
Request for Utility Information; Docket No. M-2020-3020055; **COLUMBIA
WATER COMPANY'S RESPONSES TO DATA REQUESTS OF THE
BUREAU OF CONSUMER SERVICES**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission on behalf of Columbia Water Company are the responses to BCS Data Requests, Set I, in the above-captioned matter. These responses are being filed and served electronically only pursuant to the COVID-19 Suspension Emergency Order dated March 20, 2020 and ratified March 26, 2020.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (717) 236-1300.

Very truly yours,

/s/ Thomas J. Sniscak

Thomas J. Sniscak
Whitney E. Snyder
Bryce R. Beard
Counsel for the Columbia Water Company

WES/das
Enclosures

cc: Tom Charles, Office of Communications (thcharles@pa.gov)
Sarah Dewey, Bureau of Consumer Services (sdewey@pa.gov)



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:

- 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?

RESPONSE:

The process for terminating service for nonpayment will begin as soon as the Commission's Emergency Order ends. CWC will follow the PUC requirements regarding the process for service termination. CWC will begin the service termination process only on those customers that have missed at least two consecutive payments. CWC will follow the PUC requirements regarding notice of all service termination which will include mailing at 10-day notice, attempt to contact 3 days prior to termination, posting of a 3-day notice if contact has not occur and posting of a 48 hour notice. Further customers will be afforded the opportunity to sign payment arrangements.

A utility of our size does not have the ability to continue to operate without receiving consistent and timely payments from its customers. CWC's rates were set to cover operating expenses and *when a large portion of the customers do not pay their utility bill for an extended period of time as happened here, its puts CWC at risk of being unable to have sufficient cash flow to continue operating and that in turn puts all customers, including those who are not paying, at a risk of loss of water service.* Water demand has remained at normal levels during this pandemic and thus operating expenses have also remained at normal levels. To continue to make payroll, purchase chemicals and pay utilities, it is critical that cash flow return to normal levels. Small utilities like the CWC simply are unable to extend credit to a large portion of customers for an extended period of time and still have sufficient cash to meet operating expenses.

- How does the utility plan to implement terminations and will it start the process with new termination notices?

RESPONSE:

CWC will follow the PUC requirements regarding the process for service termination. CWC will begin the service termination process on those customers that have missed at least two consecutive payments. CWC will follow the PUC requirements regarding notice of all service termination which will include mailing at 10-day notice, attempt to contact 3 days prior to termination, posting of a 3-day notice if contact has not occur and posting of a 48 hour notice. Further customers will be afforded the opportunity to sign payment arrangements.

Every service termination will begin with new termination notices.

- 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:

Customer Class	May 2020¹	May 2019
Residential ²	593	438
Commercial	15	5 ³
Industrial	0	0
Public	0	0

Notes:

1. Based upon currently available information.
2. The numerical increase of 438 in May 2019 to 593 in May 2020 is 35 percent, *but the dollar amount of the unpaid bills goes from \$25,086 in May 2019 to \$82,317 in May 2020, a 228% increase.*
3. Estimated.

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

RESPONSE:

CWC does not have the necessary resources to confirm low-income customers. Those customers seeking low-income relief, seek it through the Commission's Bureau of Consumer Services (BCS).

CWC does not have the necessary resources to provide a Customer Assistance Program.

- Provide future projections if available.

RESPONSE:

Not applicable. See response above.

- 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:

CWC will assess a reconnection fee in accordance with the Company’s tariff. The fee is collected at the time the customer pays the arrears to restore service.

At the time when the Emergency Order went into effect, no services were in shut-off status so none had to be restored.

Universal Service Programs:

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

RESPONSE:

CWC does not have the necessary resources to provide a Customer Assistance Program.

- 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:

CWC does not have the necessary resources to develop and maintain a Hardship Fund.

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:

CWC does not have the necessary resources to provide financial assistance to customers. No assistance programs have been included in our approved rates.

- 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:

CWC does not have access to capital or financial resources to provide customer assistance. CWC's approved rates do not include provisions for customer assistance programs.

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, 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.

- 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:

The Company provides educational information to its customers through a mailing with its annual Water Quality Report.

- 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:

CWC does not have access to capital or financial resources to provide income-qualified programs. The Company's website provides links to educational tools and resources.

- 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:

When required, CWC notifies customers of public input hearings by direct mailers and notices in the newspaper.

- 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:

Not applicable to public water service providers.

VERIFICATION

I, David T. Lewis, on behalf of Columbia Water Company, hereby state that the facts set forth in the foregoing documents are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing in this matter. This verification is made subject to the penalties of 18 Pa.C.S. § 4904 relating to unsworn falsification to authorities.



David T. Lewis, P.E.
Vice President and
General Manager
Columbia Water Company