



Thomas J. Sniscak
(717) 703-0800
tjsniscak@hmslegal.com

Whitney E. Snyder
(717) 703-0807
wesnyder@hmslegal.com

100 North Tenth Street, Harrisburg, PA 17101 Phone: 717.236.1300 Fax: 717.236.4841 www.hmslegal.com

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; **COMMUNITY UTILITIES OF PENNSYLVANIA, INC. WATER AND WASTEWATER DIVISIONS' 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 Community Utilities of Pennsylvania, Inc. Water and Wastewater Divisions 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/ Whitney E. Snyder

Thomas J. Sniscak
Whitney E. Snyder

*Counsel for Community Utilities
of Pennsylvania, Inc.*

WES/das

cc: Steven M. Lubertozzi, President, Community Utilities of Pennsylvania Inc.
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:

Community Utilities of Pennsylvania, Inc. (CUPA) anticipates restarting the termination of service for nonpayment approximately 60 days Commission’s Emergency Order on Terminations at Docket No. M-2020-3019244 ends.

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

Response:

CUPA will start the termination of service for nonpayment process 60 days after the Commission’s Emergency Order on Terminations at Docket No. M-2020-3019244 ends and will be working with customers impacted by COVID-19 to determine payment arrangements.

- 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: See below.

Customers Receiving Disconnect Letter

Class	DIVISION	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Total
Residential	315 Community Utilities of PA-Westgate	3	1	1	-	2	1	2	-	2	-	-	1	-	-	-	-	-	13
Commercial	315 Community Utilities of PA-Westgate	41	54	39	30	1	59	49	39	58	51	50	48	32	7	-	-	-	558
Residential	317 Community Utilities of PA-Penn Estates	32	575	468	517	27	634	459	530	489	30	546	418	47	441	2	-	-	5,215
Total		76	630	508	547	30	694	510	569	549	81	596	467	79	448	2	-	-	5,786

Customers Disconnected for Non-Payment Count

Class	Division	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Total
Residential	315 Community Utilities of PA-Westgate	1	-	-	-	1	-	-	2	1	1	-	2	-	1	-	-	-	9
Residential	316 Community Utilities of PA-Utilities Inc of PA	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	1
Residential	317 Community Utilities of PA-Penn Estates	-	2	16	17	15	4	32	14	19	10	3	-	-	14	-	-	-	146
Total		1	2	16	17	16	4	33	16	20	11	3	2	-	15	-	-	-	156

CUPA is unaware if any of these customers are confirmed low-income customers. Also, CUPA does not have any projections.

- Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected?

Response:

No. On March 10, 2020, the CUPA announced its decision to suspend water and wastewater service disconnection in order to provide critical sanitation and potable water services for all customers during this public health event. In conjunction with this decision, customers who recently have been disconnected for nonpayment will be reconnected at no charge, at their election, and collection of any outstanding balances and late fees will be suspended during this time.

- Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

Response:

CUPA intends to record the reconnection fee that was waived to a regulatory assets account for a future prudency review by the Commission.

Universal Service Programs:

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

Response:

The Company does not have a Hardship Fund or Customer Assistance Program. However, our Customer Service Representatives are prepared to offer a list of local organizations (e.g., local churches and local chapters of United Way) that can offer assistance to customers needing help to pay their utility bill.

- 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:

The Company does not have a Hardship Fund or Customer Assistance Program. However, our Customer Service Representatives are prepared to offer a list of local organizations (e.g., local churches and local chapters of United Way) that can offer assistance to customers needing help to pay their utility bill.

- 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:

See response to Section III Other.

- 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:

See response to Section III Other.

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.
- Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, 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.
- 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:

Throughout the duration of the COVID-19 crisis, our Company has prioritized regular customer communication. The Company will send our fourth direct communication to customers this week providing an update on actions taken to ensure we meet our commitment to provide safe and reliable service. The notice will also be posted on our website, our customer application, MyUtilityConnect, and all social media channels. In addition to our direct customer communications, we continue to provide real time updates to customers via social media and our

websites. As we move forward, we will continue providing customers with proactive communication to share important information and updates.

III. CUPA's Overall Response

On March 6, 2020, Governor Wolf issued a Proclamation of Disaster Emergency (PDE) proclaiming the existence of a disaster emergency. Then on March 13, 2020 the Pennsylvania Utility Commission issued an Emergency Order wherein a Moratorium Period (MP) was created, which prohibited all electric, natural gas, water, wastewater, telecommunication, and steam utilities subject to the Commission's jurisdiction from terminating service during the pendency of the PDE.

Prior to the Commission's March 13, 2020 order, the Company announced its decision to voluntarily suspend water and wastewater service disconnection thereby continuing to provide critical sanitation and potable water services for all customers during this public health event. In conjunction with this decision, customers who recently had been disconnected for nonpayment were reconnected at no charge, at their election, and collection of any outstanding balances and late fees was suspended. Also, the Company took the following proactive steps:

- Critical Inventories and Spares Planning
- Workforce Planning
- Facility Emergency Action Plans
- Suspension of All Non-essential Business Travel
- Remote Work and Office Closures
- Cyber Security Precautions
- Essential Operations Continuity Planning
- Emergency Security Clearances for Access to Plants and Facilities
- Health and Safety Guidance Policies for Operations Staff
 - Social Distancing Scheduling
 - Updated PPE Guidance
 - Vehicle Maintenance Guidance
 - Multiple Employee Tasks
 - Critical Contractor/Visitor Guidance
- Essential Personal Protective Equipment
- Lone Worker Safety

The Company took reasonable and appropriate, science-based actions required to mitigate the impacts of the COVID-19 outbreak on our employees and customers.

After the MP on disconnections expires, the Company will enter into what it is calling the Transition Grace Period (TGP), defined as the 60 days immediately following expiration of the Governor's Emergency Proclamation and the associated PUC Emergency Order on moratorium of terminations. During the TGP, the Company will not disconnect customers for nonpayment. However, the Company will work with customers impacted by COVID-19 during the TGP by offering Deferred Payment Arrangement (DPA) and waiving Late Payment Charges (LPC). The Company's collections efforts will be consistent with PUC regulations.

The Company will offer these options to our customers with the reasonable expectation that the Company will be able to record to a regulatory asset account the following, which would be subject to a prudency review by this Commission in a future rate proceeding:

- 1) COVID-19 Direct Costs are direct costs resulting from the Governor's Emergency Proclamation and PUC's Emergency Order to control the spread of the COVID-19 pandemic, and any other reasonable measures taken by the Company in response to the COVID-19 pandemic, incurred beginning March 1, 2020. These costs must be tracked to allow a meaningful future reasonableness and prudency review by the Commission. They include, but are not limited to:
 - a. one-time costs, set up for remote work options (e.g., servers, software, computer equipment) and signage; and
 - b. ongoing incremental costs, communications for remote operations, communications with the public, regulatory compliance costs, cleaning supplies and services, PPE, employee benefits and accommodations, contact tracing, and medical testing to the extent not paid by or covered by insurance.
- 2) COVID-19 Foregone Late Fees
- 3) COVID-19 Foregone Reconnection Charges

VERIFICATION

I, Steve Lubertozi, President, on behalf of Community Utilities of Pennsylvania, Inc., hereby state that the facts set forth in the foregoing document 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.



Steve Lubertozi, President

Community Utilities of Pennsylvania, Inc.

Dated: June 15, 2020