

**COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**Pennsylvania-American Water Company's Responses to
Secretarial Letter Dated May 29, 2020**

**COVID-19 Customer Service, Billing, and Public Outreach Provisions
Docket No. M-2020-3020055**

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: Given the importance of personal hygiene in preventing the spread of COVID-19, Pennsylvania-American Water Company on March 12, 2020, suspended billing-related service shutoffs. The Company has turned water service back on for customers who were previously shutoff for non-payment. This includes customers whose water service was turned off for non-payment of wastewater service, even if Pennsylvania-American Water Company is not the wastewater service provider. The Company is continuing with the suspension of all billing-related service shutoffs, providing water service for customers who previously had water turned off due to nonpayment, continuing to suspend late fees and working with customers on payment arrangements if they are experiencing financial hardship. Throughout the month of June, all residential customers will receive fliers in their monthly bills regarding the Company's H2O Help to Others low income customer assistance program.

In addition, with much of the United States now staying at home, water use could increase. Pennsylvania-American Water Company is educating customers via social media and through other digital and traditional communications on wise water use and conservation both inside and outside the home. During the month of May, customers received a "Save water, save money" brochure with their Pennsylvania-American Water Company bill that outlines a number of steps families can take to reduce home water use and encourages customers to utilize an Online Water Calculator from the Alliance for Water Efficiency (of which American Water is a member) for specific tips on saving water and energy.

Pennsylvania-American Water Company continues to remind customers online, through job site and vehicle signage, social media and updated press releases that for their safety and the safety of our employees that they follow social distancing recommendations issued by the Centers for Disease Control and Prevention, and ask customers not to approach our employees when they are seen working in the field.

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: After the Commission’s Emergency Order on Termination is lifted, Pennsylvania-American Water Company will determine the timeline it will use to begin the collections process and issue termination notices. Once the timeline is determined, the Company plans to enter customers into the collections process based upon the customer’s reading and billing schedule. Customer communication during the moratorium and leading up to service disconnections is an essential component of Pennsylvania-American Water Company’s plan. Note: Depending on the date the Commission’s Emergency Order on Termination is lifted, the commencement of the collection process and termination of service for nonpayment may be impacted by pending winter moratorium.

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

RESPONSE: Pennsylvania-American Water Company will implement the termination process beginning with the customers reading and billing schedule. In accordance with Chapter 14 and Chapter 56, the Company residential customers will receive 10-day termination notice and 72-hour notices prior to termination.

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:

2019

Strategy	Collection Step	LDSN - Disconnection Notice
LS - Special Collections	05/2019	215
NP - Non Residential	05/2019	1
PN - Non Residential	05/2019	1,405
PR - Residential	05/2019	30,599

2020

Strategy	Collection Step	LDSN - Disconnection Notice
LS - Special Collections	05/2020	205
PN - Non Residential	05/2020	2,082
PR - Residential	05/2020	37,150

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

RESPONSE: There are 4,254 potential low-income customers who may be eligible for termination.

Provide future projections if available.

RESPONSE: Future projections are not available.

Is the utility currently assessing a “reconnection fee” to restore service?

RESPONSE: Currently, Pennsylvania-American Water Company is not assessing a “reconnection fee” to restore service.

If yes, how is the fee billed and/or collected?

RESPONSE: Response is not required.

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

RESPONSE: Response is not required.

Universal Service Programs:

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

RESPONSE: Universal Service Programs are not applicable to Pennsylvania-American Water Company. Pennsylvania-American Water Company does not remove customers from its H2O Help to Others Program for non-payment. Additionally, there is no recertification process for the H2O Help to Others 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: Hardship Fund programs are not applicable to Pennsylvania-American Water Company.

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: Pennsylvania-American Water Company suspended late fees and reconnection fees. Additionally, the Company is working with customers on payment arrangements if they are experiencing financial hardship. Additionally, the Company has conducted additional outreach to its customers as well to discuss the H2O Help to Others Programs available to them. The program includes an 85% discount on the monthly service fee for water service and a 20% discount on monthly wastewater charges. Additionally, the Pennsylvania-American Water Company's H2O Help to Others Program includes a water service assistance that includes grants up to \$500 per year to be used towards household's water bill. The program also includes wastewater assistance that includes grants up to \$500 per year to be used towards household's wastewater bill.

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: At this time, Pennsylvania-American Water Company will continue to review, monitor and assess conditions and determine if additional changes to programs, practices, and policies are required, in consultation with the Commission.

Responses to the COVID-19 Utility Consumer Service and Billing Policies and Procedures are also being submitted to Sarah Dewey, sdewey@pa.gov in the Commission's Bureau of Consumer Services (BCS).

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 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: Please see Attachment 1.

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: Please see Attachment 1.

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: The Company will inform its customers of telephonic public input hearings by using social media and Company website, news releases and advertising in general readership section of local newspapers.

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: Lifeline Program is not applicable to Pennsylvania-American Water Company.

Responses to the Consumer Education and Outreach are also being submitted to Tom Charles, thcharles@pa.gov, in the Commission's Office of Communications.