



The York Water Company

June 2, 2021

Mr. Nathan Paul
Audit Supervisor
Bureau of Audits
Pennsylvania PUC
400 North Street
Harrisburg, PA 17120

Re: Management Audit (MA), D-2020-3021861

Dear Mr. Paul:

In accordance with your letter dated May 19, 2021, I have attached our Implementation Plan for the above referenced audit.

Thank you to you and your audit team for your efforts and assistance during this process.

Sincerely,

JT Hand
President and CEO

THE YORK WATER COMPANY
PUC FOCUSED MANAGEMENT AND OPERATIONS AUDIT
IMPLEMENTATION PLAN FOR AUDIT D-2020-3021861

Chapter Number VI – Water and Wastewater Operations

Recommendation Number VI-1, Page 33

Benefit/Time: Medium, 6-12 months

Recommendation:

Record causes and/or suspected causes of water main breaks.

YORK WATER RESPONSE:

The recommendation is fully accepted.

Action to be Taken: York Water will add a column to our Main Break tracking document titled “Cause”. We will track main breaks and where we can confirm the cause, we will indicate it in this column. If we discover trends or subsurface commonalities, this can further inform our operational decisions.

Individual Responsible: Tim Young

Date Recommendation is to be implemented: The recommended initiation time frame is 6-12 months; we will implement this addition in the next 2 weeks from date of submission of this response.

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Chapter Number VI – Water and Wastewater Operations

Recommendation Number VI-2, Page 33

Benefit/Time: Low, 6-12 months

Recommendation:

Leverage technology to reduce manual processes within the backflow prevention program.

YORK WATER RESPONSE:

The recommendation is fully accepted.

Action to be Taken: York Water will conduct a systemic analysis of our current process to identify ways to improve the current process to reduce the manual processes that currently exist within our backflow prevention program.

Individual Responsible: Rob Bissey

Date Recommendation is to be implemented: The recommended initiation time frame is 6-12 months; we will implement this recommendation in that time frame.

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Chapter Number VII – Emergency Preparedness

Recommendation Number VII-1, Page 37

Benefit/Time: Medium, 0-3 months

Recommendation:

Create a list of standard screening questions to be used for every outside vendor or consultant working on IT systems.

YORK WATER RESPONSE:

The recommendation is fully accepted.

Action to be Taken: York Water had developed a robust set of security screening questions, which were submitted to the audit team during the collection of information portion of the audit. We can begin using this screening device for outside vendors and consultants who we are hiring to work on any of our IT systems immediately.

Individual Responsible: Mark Hardman

Date Recommendation is to be implemented: This recommendation response was submitted to the audit team during the request for information. York Water can immediately implement the use of our security screening questions and with the next outside vendor engaged to work with or on our IT systems.

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Chapter Number VII – Emergency Preparedness

Recommendation Number VII-2, Page 37

Benefit/Time: Medium, 6-18 months

Recommendation:

Annually test physical security and incorporate live drills every three years.

YORK WATER RESPONSE:

The recommendation is fully accepted.

Action to be Taken: As noted in the audit recommendation comments, York Water has created a sound and comprehensive foundational program for physical security. We will review our current process for opportunities to perform additional live or targeted physical security drills and will prioritize areas of high potential.

Individual Responsible: Marty Strine

Date Recommendation is to be implemented: The recommended initiation time frame is 6-18 months; we will implement this recommendation within that period of time.

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Chapter Number VII – Emergency Preparedness

Recommendation Number VII-3, Page 37

Benefit/Time: Medium, 6-12 months

Recommendation:

Perform additional business continuity drills to improve knowledge/capabilities.

YORK WATER RESPONSE:

The recommendation is fully accepted.

Action to be Taken: As noted in the audit recommendation comments, York Water rather quickly and successfully altered our operations at the start of the COVID-19 pandemic to ensure continuity of service, absent interruption. York Water was able to reopen its doors for the convenience of our customers on May 26, 2020 following the Governor of Pennsylvania’s mitigation order change announced on May 23, 2020. York Water remains, to this day, one of the few public water utilities in the state to be open for customer service and payment activities. Most importantly, our continuity of operations changes protected both our employees and our customers throughout the public health emergency, without exception. The recommendation states that the PUC auditors have identified an opportunity to incorporate other drills that could test aspects of our continuity plan. We look forward to additional details on these other drills and how other public water utilities have benefited from these opportunities.

Individual Responsible: Mark Wheeler

Date Recommendation is to be implemented: The recommended initiation time frame is 6-12 months; we will implement this recommendation to include a review of the auditor’s identified opportunities as they are shared with us.

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Chapter Number VIII – Purchasing and Materials Management

Recommendation Number VIII-1, Page 41

Benefit/Time: Low, 6-12 months

Recommendation:

Review the inventory requisition process and implement changes to strengthen distribution of materials to contractors.

YORK WATER RESPONSE:

The recommendation is fully accepted.

Action to be Taken: York Water will review our current process to identify ways to enhance our practices and systems to improve, tighten and track the distribution from and return of materials to our inventory.

Individual Responsible: Rob Bissey

Date Recommendation is to be implemented: The recommended initiation time frame is 6-12 months; we will implement this recommendation within that time frame.

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Chapter Number IX – Customer Service

Recommendation Number IX-1, Page 49

Benefit/Time: Medium, 0-3 months

Recommendation:

Continue outreach efforts to engage payment troubled customers, leverage low-income resources to mitigate the overall level of unpaid customer balances, and proactively contact customers who miss a payment.

YORK WATER RESPONSE:

The recommendation is fully accepted.

Action to be Taken: Given the unprecedented COVID-19 global pandemic and the significant economic and personal impacts it has had on our customers and communities that we serve, York Water believes that it handled its fiduciary and community responsibilities in a very positive way for all stakeholders. This required a thoughtful and calculated balancing of interests. It is undeniable that the Commission's Orders prohibiting collections processes through most of 2020 both supported our community conscious restraint and resulted in the cited statistical data related to customer balances. Unquestionably, 2020 is an outlier in York Water's history and we are moving appropriately to rectify the trends. To date, we already see the data trending in a positive direction and we are confident that with our efforts and a rebounding global economy, we will return to our typical balance ratios quickly.

Individual Responsible: Vernon Bracey

Date Recommendation is to be implemented: This is complete. When the Pennsylvania Public Utility Commission lifted the utility service moratorium on the order of March 11, 2021, York Water began re-initiating our process for proactively contacting customers about their unpaid balances and resolving those balances.

York Water has separately continued the York Water Cares program, which has issued \$60,000 in payment assistance funding from 2019 - 2021 to two separate agencies, The Salvation Army and Community Progress Council. Of these funds, there is currently less than \$3,000 that remains unspent by customers to help them with their unpaid balances. Additionally, we are engaged with Community Progress Council and South Central Community Action Programs to coordinate assistance for our customers to obtain funds from the Emergency Rental Assistance Program (ERAP), in York, Adams and Franklin Counties.