BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2021-3027385
	:	R-2021-3027386
Aqua Pennsylvania, Inc., and	:	
Aqua Pennsylvania Wastewater, Inc.	:	

SURREBUTTAL TESTIMONY OF HARRY GELLER, ESQ.

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND

ENERGY EFFICIENCY IN PENNSYLVANIA ("CAUSE-PA")

December 14, 2021

CAUSE-PA

STATEMENT 1SR

12/20/21 SB

PREPARED SURREBUTTAL TESTIMONY OF HARRY GELLER, ESQ.

Q: Please state your name, occupation, and business address.

A: My name is Harry Geller. I am an attorney. I am the former Director of the Pennsylvania Utility Law Project. I am currently retired but serve as Senior Counsel to the Pennsylvania Utility Law Project (PULP) and as a consultant to legal aid programs and their clients. I maintain an office at 118 Locust St., Harrisburg, PA 17101.

Q: Did you previously submit testimony in this proceeding?

A: Yes. I submitted direct testimony, pre-marked CAUSE-PA St. 1, and rebuttal testimony, pre-marked CAUSE-PA 1-R, on behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA).

Q: What is the purpose of your surrebuttal testimony?

A: My surrebuttal testimony responds to the rebuttal testimony of Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater Inc. (collectively, Aqua)'s expert witness Ms. Rita F. Black. Specifically, I will respond to Ms. Black's analysis of the recommendations to improve the structure and coordination of Aqua's proposed Customer Assistance Program (CAP) and its Helping Hand arrearage forgiveness program. I will also briefly address the rebuttal of the Bureau of Investigation and Enforcement's (I&E) expert witness, Ms. Christine Wilson, to recommendations that I outlined in my direct testimony to provide additional relief measures in light of the COVID-19 pandemic, including waiving reconnection fees and offering more flexible payment arrangements for at least one year from the final order in this proceeding.

My surrebuttal testimony is not intended to address every issue raised or otherwise discussed by the expert witnesses of Aqua or the other parties in this proceeding. Absence of a response to any specific recommendation or position of any witness does not indicate my

agreement. Unless required for context in providing further response to rebuttal testimony, I will not reiterate the extensive arguments and evidence that I provided in my direct and rebuttal testimonies. To the extent an argument raised by any party in rebuttal is already sufficiently addressed in my direct or rebuttal testimonies, I do not intend to respond, but stand by the evaluations, analyses, and recommendations contained in my direct and rebuttal testimonies.

Q: How is your surrebuttal testimony organized?

A: First I will respond to the rebuttal testimony of Aqua's expert witness, Ms. Rita F. Black. Specifically, I will discuss Ms. Black's response to the recommendations set forth in my direct testimony and the direct testimony of the expert witness for the Office of Consumer Advocate (OCA), Mr. Roger D. Colton, related to the structure of Aqua's proposed CAP, the structure of the Helping Hand arrearage forgiveness program, and the coordination of Aqua's proposed CAP with the Helping Hand arrearage forgiveness program.

Second, I will briefly respond to the rebuttal testimony of I&E's expert witness, Ms. Christine Wilson. As discussed below, I disagree with Ms. Wilson's assessment that it is inappropriate to require Aqua to implement several COVID-19 relief measures outlined in my direct testimony, including waiving reconnection fees and granting more flexible payment arrangement standards for at least a year from the date of the final order in this proceeding.

1. Response to Aqua's expert witness, Ms. Rita F. Black

Q: Does Ms. Black accept any of your recommendations to improve Aqua's low income programming in her rebuttal testimony?

A: Yes. In her rebuttal testimony, Ms. Black appears to accept several of the recommendations I set forth in my direct testimony, including (1) development of a customer

education and outreach plan;[1] (2) seeking collaboration with other utilities to cross-promote its low income programs;[2] (3) providing training for contact center staff about the availability of assistance programs;[3] (4) setting a maximum cash hardship fund grant amount at $500;[4] and (5) providing arrearage forgiveness credits for full CAP payments, regardless of timeliness.[5] I appreciate Ms. Black's support of these recommendations and believe that these improvements to Aqua's low income programs will help low income customers to better afford their monthly water and wastewater bills.

I note that Ms. Black also agreed that unspent hardship fund dollars "could be carried over to the following year", [6] though it is unclear from her testimony whether she has committed to doing so. As I explained in my direct testimony, hardship fund dollars must not only be carried over from year to year, remaining program dollars should also be added to the program budget for the following year. Given the overwhelming documented need for assistance, the fact that funds remain at the end of a program year is indicative of problems with outreach and administration – not lack of need.[7]

In agreeing with my recommendation for a $500 maximum hardship fund grant threshold, Ms. Black also noted that hardship fund grants should be a "once-per-calendar-year opportunity" – and should be limited to the amount the customer needs at the time of application. I disagree with Ms. Black's caveat. Rather than limit households to a single grant in a calendar year, I recommend that households have access to up to $500 in a calendar year – whether in a single grant or multiple grants. In other words, if a household receives a $250 grant in April to

[1] Aqua St. 10-R at 5: 5 -14.
[2] Id. at 6: 2-7.
[3] Id. at 6: 17-19.
[4] Id. at 7: 3-12.
[5] Id. at 9: 16-22.
[6] Id. at 7: 3-12.
[7] CAUSE-PA St. 1 at 56: 2 – 57: 6.

resolve debt or avoid a termination, they would remain eligible for up to $250 additional dollars later in the year if they again face termination. This is similar to how the LIHEAP Crisis program functions and recognizes the constant constraints of poverty on low income families. It is also more equitable by ensuring that all households have equal access to the same level of annual funding needed to resolve their crises, as well as ensuring that a household who proactively seeks assistance when their debt is relatively low will not be locked out of additional assistance if they are unable to get back on their feet right away.

Q: Did Ms. Black's rebuttal testimony change your opinion with regard to any of the positions or recommendations you advanced in your direct and rebuttal testimony?

A: No. I continue to support the other recommendations in my direct testimony that were not adopted by Ms. Black, including several critical improvements to the structure and coordination of Aqua's proposed CAP and the Helping Hand program. I will address Ms. Black's response to these recommendations in turn below.

a. *Structure of Proposed Customer Assistance Program (CAP)*

Q: Please summarize Ms. Black's testimony regarding the structure of Aqua's proposed CAP to which you wish to respond.

A: Ms. Black objects to my recommendation that the structure of Aqua's CAP be implemented on a pilot basis, and argues that pilot programs can be difficult to promote and subject participants to a potential loss of benefits.[8] Ms. Black also objects to the recommendation of OCA expert witness Mr. Colton that Aqua adopt a fourth tier of discounts for its proposed CAP for customers at or below 50% FPL, and to Mr. Colton's recommended enhanced CAP discounts outlined in his direct testimony.[9] Ms. Black argues that providing further discounts

[8] Aqua St. 10-R at 7: 14-21.
[9] Id. at 11: 8-21.

adds to program costs, discourages conservation, and would further complicate the enrollment and maintenance process given Aqua's current billing system.[10]

Ms. Black further objects to Mr. Colton's and my recommendation that Aqua move towards a percentage of income plan (PIP) structure for its proposed CAP.[11] Ms. Black argues that PIP structures are typically more expensive and more costly to ratepayers.[12] Ms. Black argues that its proposed CAP structure, which would provide discounts based on income tiers, provides reasonable discount levels while maintaining program costs.[13]

Q: What is your response to Ms. Black's criticism of Mr. Colton's and your recommended improvements to Aqua's proposed CAP structure.

A: Initially, it is important to clarify that I do not recommend that Aqua's proposed CAP be implemented on a pilot basis – but rather the *structure* of Aqua's CAP be implemented on an interim basis to allow for critical improvements in affordability after initial CAP implementation.

While I appreciate that Aqua has proposed a CAP structure that provides discounts by income tiers, I continue to be concerned that Aqua's proposed CAP structure does not adequately address affordability for low income customers, and results in particularly high water/wastewater burdens for low income customers at the bottom of the poverty scale with higher usage levels.[14] The PIP structure has the specific advantage of having an equitable CAP billing structure for all participants, which addresses affordability and can be designed so that no group of low income customers is overburdened. I disagree that improving the discount levels to the proposed CAP will necessarily result in increased program costs. As I discussed in my direct testimony, utility

[10] Id. at 11: 17-22.
[11] Id. at 10: 18-23.
[12] Id. at 10-11.
[13] Id. at 11: 1-6.
[14] CAUSE-PA St. 1 at 42: 9 – 43: 3.

assistance programs are most successful at achieving programmatic goals – including reducing uncollectible expenses and termination-related costs -- when they are designed to deliver consistent and targeted levels of affordability across income and usage levels in tandem with meaningful arrearage management.[15] Thus, I disagree with Ms. Black's assessment that improving CAP bill affordability and moving towards a PIP-structure will necessarily incur greater costs overall for the Company and ratepayers.

I also disagree with Ms. Black that improving the discount levels of the proposed CAP will disincentivize conservation. As discussed in my direct testimony, it is my experience that many low income customers experience higher usage costs because lower income families tend to live in older housing stock and have correspondingly higher likelihood for costly leaks that often go unrepaired – either because of a lack of resources or a landlord's refusal to conduct necessary repairs.[16] These customers – who already struggle to afford basic necessities – should not have to continue under the weight of unaffordable water/wastewater bills. Rather, as Ms. Black supports, Aqua should develop a robust low income conservation and emergency repair program that is able to address the conservation needs of Aqua's low income customers, in coordination with the conservation and Low Income Usage Reduction Programs (LIURPs) of other utilities in Aqua's service territory.[17]

While I am sensitive to Ms. Black's concern that adding an additional discount tier prior to PIP implementation will result in additional complication to implementation and maintenance of the proposed CAP, I believe that is essential that Aqua's proposed CAP will provide reasonable levels of affordability to all CAP participants – especially those with the lowest

[15] Id. at 42: 3-8.
[16] Id. at 51: 11-14.
[17] Aqua St. 10-R at 14: 11-22.

incomes who struggle most profoundly to make ends meet. While I have recommended that my preferred PIP structural implementation be delayed in deference to Aqua's SAP implementation schedule, it would be unreasonable for Aqua to reject the use of more reasonably affordable rates in its proposed CAP simply because doing so would result in greater complexity. I therefore maintain my position that Aqua should be required, prior to PIP implementation, to implement the discount levels recommended in Mr. Colton's direct testimony.

Finally, I appreciate that Aqua's current systems limit its ability to establish a PIP. However, as Ms. Black indicates, Aqua will be converting to a new SAP in 2023.[18] These system upgrades should allow for changes to Aqua's proposed CAP structure, including implementation of a PIP-design. I therefore maintain my recommendation that Aqua be required to implement a PIP by its next base rate proceeding.

b. Structure of Helping Hand Arrearage Forgiveness Program

Q: Please summarize Ms. Black's rebuttal testimony regarding the structure of Aqua's Helping Hand arrearage forgiveness program to which you wish to respond.

A: In her rebuttal testimony, Ms. Black objects to the recommendations set forth in Mr. Colton's and my direct testimony that the structure of Aqua's arrearage forgiveness program be revised to provide full forgiveness of pre-program arrears within 3 years.[19] Ms. Black argues that (1) Aqua's current billing system does not have the capability to implement this change; and (2) that for customers with pre-program arrears less than $900, Aqua's current structure of providing a $25 per month credit would exhaust arrears in less than three years.[20] Ms. Black notes that through utilization of hardship funding and upcoming funding through the Low Income

[18] Id. at 8: 7-11.
[19] Id. at 8-9.
[20] Id. at 9: 1-5.

Household Water Assistance Program (LIHWAP), a greater number of Helping Hand participants will be able to decrease their arrearage balances to less than $900.[21]

Q: What is your response to Ms. Black's criticism to revising the structure of Helping Hand to provide full arrearage forgiveness within 3 years?

A: I disagree with Ms. Black that the current structure of Helping Hand is sufficient to equitably address the arrearage levels of Aqua's low income customers. As discussed more fully in my direct testimony, the average arrearage of Helping Hand customers was approximately $1,211.36 as of August 2021.[22] At $25 per month, it would take the average Helping Hand customer more than 4 years to retire this level of arrears. Customers that carry arrears higher than this average would have to successfully make full monthly payments for even longer periods before they could achieve total forgiveness on their arrears, making the expectation of successfully resolving their debt unrealistic.

I recognize that Aqua's current systems limit its ability to revise the structure of its Helping Hand arrearage forgiveness program to allow for full forgiveness of pre-program arrears within 3 years. As discussed above, Ms. Black indicates in her rebuttal testimony that Aqua will be converting to a new SAP in 2023.[23] These system upgrades should allow for changes to the structure of Helping Hand to allow for a percent of customers' arrears be forgiven for each in-full payment. In order to more equitably ensure that Helping Hand customers can obtain full arrearage forgiveness and achieve affordable bills, I stand by the recommendation in my direct testimony that Aqua revise the structure of its Helping Hand arrearage forgiveness program so that (1) when entering the program, pre-program arrears are frozen and no longer accrue late fees

[21] Id. at 9: 5-11.
[22] CAUSE-PA St. 1 at 50: 20-51: 1.
[23] Aqua St. 10-R at 8: 7-11.

or charges; and (2) for each in-full payment that a customer makes while enrolled in Helping Hand, 1/36th of the customer's frozen arrears or $25, whichever is greater, should be forgiven.[24] In light of the current limitations of Aqua's systems and its implementation of an SAP in 2023, I recommend that Aqua be required to implement these changes within 90 days of conversion of its SAP.

c. Coordination of Helping and Aqua's Proposed Customer Assistance Program (CAP)

Q: Please summarize Ms. Black's testimony regarding the coordination of Aqua's proposed CAP with its Helping Hand arrearage forgiveness program to which you wish to respond.

A: Ms. Black clarifies in her rebuttal testimony that Aqua is not planning to automatically enroll existing Helping Hand customers into its new CAP.[25] Ms. Black indicates that Aqua intends to perform limited outreach to existing Helping Hand customers through a single letter to existing Helping Hand customers to explain the new program and encourage application.[26]

Q: What is your response to Ms. Black's clarification regarding the CAP enrollment process for existing Helping Hand customers?

A: As I discussed in my direct testimony,[27] I continue to be concerned about whether existing Helping Hand customers will be informed of and can readily enroll in Aqua's CAP. In addition to other steps I have recommended in my direct testimony to streamline this application process,[28] I recommend Aqua not require current Helping Hand participants to complete an

[24] CAUSE-PA St. 1 at 53: 5-15.
[25] Aqua St. 10-R at 3: 1-11.
[26] Id.
[27] CAUSE-PA St. 1 at 45-47.
[28] Id. at 47-48.

application or verification requirement to enroll in CAP. These households should be permitted to enroll in CAP through a simplified process, such as checking a box on the bill, returning a post card, or providing verbal consent, and should only be required to complete further application or verification procedures at the time of their first CAP recertification. Further, to ensure that Helping Hand customers are appropriately informed of and encouraged to enroll in the proposed CAP, I recommend that Aqua attempt to contact existing Helping Hand customers through several means, including letters, outbound calls, and through community outreach. I recommend that Aqua work with stakeholders through its Helping Hand Collaborative to develop robust means of outreach to existing Helping Hand customers to assist with the program transition and ensure that participants are able to avail themselves of the best available programming.

2. Response to Ms. Christine Wilson's Rebuttal Testimony

Q: Please summarize the rebuttal testimony of Ms. Christine Wilson to which you wish to respond.

A: Ms. Wilson opposes my recommendations that Aqua should be required to suspend terminations, waive reconnection fees, and offer more lengthy payment arrangements regardless of customer account history for at least one year beyond the date of the final order in this proceeding.[29] Ms. Wilson argues that recommending these additional COVID-19 relief measures for at least a year from the final order in this matter is somewhat arbitrary, and that the Commission's requirements for suspending terminations and providing more flexible payment arrangement standards has lapsed.[30] Ms. Wilson specifically notes that, in a motion in response to lifting the utility service termination moratorium earlier this year, Chairman Brown Dutrieuille indicated that it was time to return to the regular collection, and alluded to recent improvements

[29] I&E St. 1-R at 6: 2-8; CAUSE-PA St. 1 at 6; 32-33.
[30] I&E St. 1-R at 7: 10- 9: 17.

in the course of COVID-19, including the development of vaccines and increased availability of assistance funding.[31] Ms. Wilson argues that if any changes to terminations, reconnections fees, and payment arrangements are to be implemented, it would be most appropriate on the state level.[32]

Q: What is your response to Ms. Wilson's criticism of your recommended COVID-19 relief measures?

A: I disagree with Ms. Wilson that implementing the additional relief measures I recommended in my direct testimony for at least a year from the date of the final order would be an arbitrary timeframe. As Ms. Wilson and Ms. Black both note in their rebuttal testimonies, the Low Income Household Water Assistance Program (LIHWAP) is expected to begin in January 2022[33] and will provide critical assistance to low income customers with arrears. Allowing additional relief measures for at least one year will help to bridge the divide and allow crucial funding to reach Aqua's low income customers who struggle under the weight of arrears and unaffordable monthly bills.

I also disagree with Ms. Wilson's argument that it is inappropriate to grant additional COVID-19 relief measures as the Commission's requirements that utilities waive reconnection fees and offer more flexible payment arrangements have lapsed. The Commission's regulations provide a floor of minimal protections that must be provided to Pennsylvania utility customers, and do not preclude additional protections being established when appropriate. While certain improvements – as noted by Chairman Brown Dutrieuille – have helped to improve the course of

[31] Id. at 8: 1-14.
[32] Id. at 10-11.
[33] Aqua St. 10-R at 9: 8-11; see also I&E St. 1-R at 5: 16-19; PUC Encourages Consumers to #KeepUtilitiesOn with Low-Income Household Water Assistance Program (Dec. 9, 2021), available at: https://www.puc.pa.gov/press-release/2021/puc-encourages-consumers-to-keeputilitieson-with-low-income-household-water-assistance-program.

the pandemic, residential customers continue to carry substantially greater levels of debt – and face substantially higher rates of termination – since the expiration of the Commission's emergency moratorium on utility terminations.[34] As it stands, the pandemic is still very much a threat to the lives and livelihoods of Pennsylvanians. While I support addressing the difficulties that residential customers face on a statewide level, the absence of additional regulatory changes by the Commission should not prevent Aqua from establishing additional protections to help its low income customers stay connected to life-sustaining water and wastewater services essential to remaining in homes and maintaining healthy households. Thus, I maintain and stand by the recommendations set forth in my direct testimony to provide additional protections in light of the ongoing COVID-19 pandemic.

Q: Does this conclude your surrebuttal testimony?

A: Yes.

[34] CAUSE-PA St. 1 at 29: 8 – 31: 2.

VERIFICATION

I, Harry Geller, Esq., hereby state that the facts set forth in CAUSE-PA St. 1-SR, the Surrebuttal Testimony of Harry Geller, Esq., 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 held in this matter. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsifications to authorities.)

Dated: December 14, 2021

Harry Geller, Esq.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2021-3027385
	:	R-2021-3027386
Aqua Pennsylvania, Inc., and	:	
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REBUTTAL TESTIMONY OF HARRY GELLER, ESQ.

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND

ENERGY EFFICIENCY IN PENNSYLVANIA ("CAUSE-PA")

December 2, 2021

CAUSE-PA
STATEMENT 1R
12/20/21 SB

PREPARED REBUTTAL TESTIMONY OF HARRY GELLER, ESQ.

Q: Please state your name, occupation, and business address.

A: My name is Harry Geller. I am an attorney. I am the former Director of the Pennsylvania Utility Law Project. I am currently retired but serve as Senior Counsel to the Pennsylvania Utility Law Project (PULP) and as a consultant to legal aid programs and their clients. I maintain an office at 118 Locust St., Harrisburg, PA 17101.

Q: Did you previously submit testimony in this proceeding?

A: Yes. I submitted direct testimony pre-marked CAUSE-PA Statement 1 on behalf of the Coalition for Affordability Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA).

Q: What is the purpose of your rebuttal testimony?

A: My rebuttal testimony responds to the direct testimony of Christine Wilson, expert witness for the Bureau of Investigation of Enforcement (I&E), marked I&E Statement 1. Specifically, I will respond to Ms. Wilson's recommendation that the Commission order additional income verification requirements if Aqua's proposed Customer Assistance Program (CAP) is approved. I will also briefly address several recommendations related to Aqua's low income programming set forth by the Office of Consumer Advocate's (OCA) expert witness, Mr. Roger Colton, as well as the residential customer service recommendations set forth by OCA's expert witness, Ms. Barbara Alexander.

My rebuttal testimony is not intended to address every issue raised or otherwise discussed in the direct testimonies submitted by expert witnesses in this proceeding. Absence of a response to any specific recommendation or position of any witness does not indicate my agreement thereto. Unless required for the context of providing further response to direct testimony, I will

not reiterate the extensive arguments and evidence that I provided in my direct testimony. To the extent that an argument raised by any party is already sufficiently addressed in my direct testimony, I do not intend to respond, and stand on the evaluations, analyses, and recommendations contained in my direct testimony.

Q: How is your rebuttal testimony organized?

A: First, I will respond to the direct testimony and recommendations of I&E's expert witness, Ms. Wilson. As discussed in detail below, I oppose Ms. Wilson's recommendation that Aqua be required to impose restrictive income documentation requirements for its proposed CAP that will hamper low income customers' ability to successfully enroll and remain in CAP. Imposing additional restrictions on CAP certification and recertification will impede successful implementation of Aqua's proposed CAP and prevent low income customers from achieving critical bill affordability.

Second, I briefly respond to Mr. Colton's recommendations to improve the accessibility and affordability of Aqua's low income programs. (OCA St. 5). As discussed below, I strongly support Mr. Colton's recommendations, and believe that the recommendations in my direct testimony dovetail Mr. Colton's recommendations to help Aqua's low income programs operate successfully.

Finally, I briefly respond to recommendations made by OCA's expert witness, Ms. Barbara R. Alexander (OCA St. 6). As discussed in further detail below, I support Ms. Alexander's recommended improvements to Aqua's quality service and customer service standards and reserve the right to respond to other parties' responses to Ms. Alexander's recommendations.

1 ***1. Response to Direct Testimony of Ms. Christine Wilson – I&E Statement 1***

2 **Q: Please summarize the direct testimony of I&E's expert witness, Ms. Christine**
3 **Wilson, to which you wish to respond.**

4 A: In her direct testimony, Ms. Wilson accepts most aspects of the proposed CAP, but
5 recommends that Aqua perform additional income verification for CAP applicants.[1] Ms. Wilson
6 notes that Aqua has not indicated that it plans to verify income to begin participating in CAP or
7 that there will be recertification requirements for the proposed CAP.[2] Without support, Ms.
8 Wilson alleges that, absent stringent income verification requirements, Aqua's proposed
9 Universal Service Plan will be subject to abuse and will harm paying customers.[3] Ms. Wilson
10 recommends that the Commission require the Company to establish guidelines for income
11 verification consistent with Peoples' requirements prior to the CAP proposal being approved.[4]

12 **Q: Do you support Ms. Wilson's recommendation that Aqua implement additional**
13 **income verification for its proposed CAP?**

14 A: No. First, to be clear, Aqua proposes to use self-declared income to verify CAP eligibility
15 and – in line with the requirements of Helping Hand –that CAP participants would not have to
16 recertify their income by submitting documents to the Company for review.[5] Ms. Wilson has not
17 presented any evidence to support her contention that failure to require more stringent income
18 documentation will cause the process to be subject to abuse and ultimately harm residential
19 customers.

[1] I&E St. 1 at 45: 1-8.
[2] Id. at 45: 11-17.
[3] Id. at 46: 17-47: 3.
[4] Id. at 47: 1-3.
[5] OCA V-29; CAUSE-PA I-28.

1 I am concerned that imposing more restrictive income documentation requirements, as
2 Ms. Wilson proposes, will act as a barrier to low income customers successfully enrolling in
3 CAP, and hinder the success of Aqua's CAP while the program is still in its nascency. As
4 discussed in my direct testimony, Aqua's low income programming has historically seen
5 extremely low levels of enrollment – especially compared to the number of low income
6 customers Aqua estimates are eligible for assistance.[6] I set forth a number of recommendations
7 in my direct testimony critical to improving program enrollment in Aqua's low income programs
8 and successfully enrolling customers in Aqua's proposed CAP.[7] I am therefore greatly
9 concerned that imposing income documentation requirements on low income customers will
10 significantly impede the important goal of customers successfully enrolling in CAP.
11 Similarly, imposing recertification requirements that are out of line with Helping Hand's
12 policies and procedures will prevent CAP customers from staying in CAP and maintaining
13 critical bill discounts. Requiring periodic recertification may be particularly difficult for Seniors
14 and individuals with a disability, as these households more often lack accessible transportation
15 options and/or the technology necessary to gather and submit income documentation, and at the
16 same time are more likely to rely on fixed income sources that do not change from year to year,
17 adding unnecessary burden and administrative expense. Available independent evaluations of
18 Universal Service and Energy Conservation Plans (USECPs) of other regulated Pennsylvania
19 utilities have shown that requiring income documentation through Program recertification is one
20 of the most significant causes of high program attrition.[8] Ultimately, a streamlined CAP

[6] See, e.g., CAUSE-PA St. 1 at 54: 5-11; CAUSE-PA St. 1 at 48:15-49:9.
[7] CAUSE-PA St. 1 at 5-8.
[8] See 2017 Columbia Impact Evaluation of its Universal Service and Energy Conservation Programs at 7, 36, available at https://www.puc.pa.gov/general/pdf/USP_Evaluation-Columbia.pdf ("'Failed to Recertify' was one of the top reasons that customers were removed from CAP in 2016. Approximately 11% (2,435) of total CAP participants year-end December were removed for failure to recertify income."); Philadelphia Gas Works 2019

1 application process that does not impose administratively burdensome and unnecessary income
2 documentation or recertification requirements is an efficient mechanism for Aqua that will help
3 develop and maintain program enrollment, and ultimately save Aqua both time and resources.
4 In sum, I oppose Ms. Wilson's recommendation that the ALJ and the Commission
5 impose additional income documentation requirements for enrollment and recertification which
6 will act as an impediment to successful program enrollment and retention. In the event that the
7 ALJ and the Commission determine that Aqua's proposal regarding income verification for its
8 proposed CAP needs further monitoring and evaluation after implementation, I recommend that
9 Aqua's proposed verbal income verification process be implemented on a pilot basis that allows
10 Aqua, the parties, stakeholders, and the Commission to monitor how CAP enrollment, retention,
11 and costs have been affected and to determine if there is any evidence of actual abuse of Aqua's
12 process. If it is later determined Aqua's verbal income verification process is indeed subject to
13 abuse, and that additional documentation requirements are necessary to stem identified
14 enrollment issues, Aqua should be required to consult stakeholders through a special Helping
15 Hand Collaborative to develop a reasonable process for applicants to submit income
16 documentation without creating unreasonable barriers to enrollment in the program.
17 Stakeholders should discuss the following issues: (1) common barriers to obtaining income
18 verification and documentation; (2) alternative methods to certify and recertify income if
19 customers are unable to obtain necessary documentation; (3) under what circumstances CAP

Universal Service Programs Impact Evaluation, at xiv, executive summary, available at https://www.puc.pa.gov/pcdocs/1614503.pdf (15% of CRP participants had been suspended for failure to recertify in 2017 calendar year); FirstEnergy 2017 Impact Assessment, at iv, executive summary, available at: https://www.puc.pa.gov/general/pdf/USP_Evaluation-FirstEnergy.pdf (of a total of 26,134 PCAP dismissals in 2015, between 62-64% of dismissals were for failure to recertify); 2015 Duquesne Light Company Universal Service Programs Final Evaluation Report, at 12, available at: https://www.puc.pa.gov/general/pdf/USP_Evaluation-Duquesne.pdf (2,919 out of 3,539 CAP defaults reported for failure to recertify in 2014); 2013 Peoples TWP Universal Service Impact Evaluation at 21, available at https://www.puc.pa.gov/general/pdf/USP_Evaluation-PeoplesTWP.pdf.

participants will not be required to recertify, including if they have received a LIHEAP or LIHWAP grant within the previous program year; (4) language access issues to obtaining income verification and documentation, and a list of resources and forms that will be translated into, at minimum, Spanish; and (5) income verification for customers with fixed incomes, or incomes from a consistent funding source. In the event Aqua ultimately imposes an income documentation requirement, this process should *also* be implemented on a pilot basis that allows Aqua, the parties and stakeholders, and the Commission to again monitor how these requirements affect CAP enrollment, retention, and costs to compare against the data from its initial income verification pilot.

2. Response to Direct Testimony of Mr. Roger Colton – OCA Statement 5

Q: Please summarize the direct testimony of OCA expert witness Mr. Roger Colton to which you wish to respond.

A: Mr. Colton sets forth several recommendations for improving the affordability and accessibility of Aqua's current low income programs, and its proposed CAP.[9] Specifically, Mr. Colton recommends that Aqua:[10]

- Modify its water/wastewater discounts for its proposed CAP. Specifically Mr. Colton recommends the following modified discount for water and wastewater CAP participants:[11]

	Water	Wastewater
0-50% FPL	100% discount of fixed 100% discount on consumption for first 2K gallons 40% discount on consumption of second 2K gallons	100% discount of fixed 100% discount on consumption for first 2K gallons
50-100% FPL	100% discount of fixed 100% discount on consumption for first 2K gallons	75% discount of fixed 100% discount on consumption for first 2K gallons

[9] OCA St. 5 at 4-5.
[10] Id.at 4-5.
[11] Id. at 35, Table 9; OCA St. 5 at 39, Table 39.

	20% discount on consumption of second 2K gallons	
100-150% FPL	100% discount of fixed 65% discount on consumption for first 2K gallons 0% discount on consumption of second 2K gallons	65% discount of fixed 50% discount on consumption for first 2K gallons
150-200% FPL	100% discount of fixed 0% discount on consumption	50% discount of fixed 0% discount on consumption

- Propose a percentage of income program (PIP) no later than its next rate case;[12]
- Modify the structure of arrearage forgiveness so that program participants can eliminate pre-program arrears within three years; arrearage forgiveness credits are granted for full payments made, regardless of the timeliness of these payments; and integrate bill discount and arrearage forgiveness so that separate application processes are not required for these programs; [13]
- Recover proposed discounts through base rates, with recovery being limited to net program costs;[14]
- Address inter-class allocation of low income program costs in future rate cases;[15]
- Develop a community education and outreach plan (CEOP).[16]

Q: Do you support Mr. Colton's recommendations related to Aqua's low income programming?

A: Yes. Similar to Mr. Colton, I recommended in my direct testimony that Aqua be required to revise its structure of its arrearage forgiveness program to provide forgiveness over a three-year period,[17] to integrate its arrearage forgiveness and bill discount to improve Program accessibility,[18] and to provide arrearage forgiveness credits regardless of the timeliness of

[12] OCA St. 5 at 31: 15-22.
[13] Id. at 50-51.
[14] Id. at 42: 4-17.
[15] Id. at 46-47.
[16] Id. at 49-50.
[17] CAUSE-PA St. 1 at 53: 5-15.
[18] Id. at 52-53.

payments.[19] I similarly recommended in my direct testimony that Aqua be required to develop a community education and outreach plan.[20]

I support Mr. Colton's recommendations to revise the structure of Aqua's proposed CAP. I expressed concern in my direct testimony that, based on an initial bill analysis, it did not appear that Aqua's proposed CAP discount structure provided consistent levels of affordability for CAP participants.[21] While I recommended that Aqua be allowed to implement its proposed CAP structure on a pilot basis to address immediate unaffordability for Aqua's low income customers and require that Aqua continue to assess bill affordability under its pilot program, I support Mr. Colton's recommended modifications to the proposed CAP structure – which would provide increased discounts for customers at or below 150% Federal Poverty Level (FPL), and would address bill affordability for customers with higher usage levels.

I further support Mr. Colton's recommendations that CAP participants with household incomes 0-50% FPL should be carved out as a separate group – as well as Mr. Colton's recommended improvements to the proposed usage discount levels. In my direct testimony, I noted that Aqua's proposed CAP structure resulted in low income customers with higher usage levels and lower income levels having combined water/wastewater burdens which exceeded acceptable levels of affordability.[22] Mr. Colton's recommended discount levels will help to improve the total water/wastewater burdens of households with higher usage levels and help to more specifically target affordability for customers at the bottom of the poverty scale.

I also support Mr. Colton's recommendation that Aqua be required to take steps to transition towards a PIP by its next base rate proceeding. In my direct testimony, I recommended

[19] Id. at 53: 5-15.
[20] Id. at 64-66.
[21] Id. at 42: 3-8.
[22] Id. at 42-43.

that Aqua take steps to evaluate whether its CAP discount structure provided consistent levels of affordability for CAP participants – and transition to a PIP if Aqua's CAP was not producing consistent levels of affordability based on customers' household income and usage levels.[23] Ultimately, like Mr. Colton, I believe that a PIP-structured CAP discount would more closely ensure that those at the lowest levels of poverty, and CAP customers experiencing higher usage levels, are not paying a disproportionate level of their incomes for critical water and wastewater services, and would improve the ability of low income families to stay connected to water and wastewater services in their homes. Thus, I maintain my recommendation that Aqua be required to conduct a bill analysis, at different FPLs and usage levels, about the water/wastewater burdens achieved as a result of their CAP structure. Based on this analysis, and consistent with Mr. Colton's recommendation, I suggest that Aqua be required to take steps to implement a PIP by their next rate proceeding to better target and achieve affordable water/wastewater burdens for CAP participants.

3. Response to Direct Testimony of Ms. Barbara R. Alexander – OCA Statement 6

Q: Please summarize the direct testimony of OCA expert witness Ms. Barbara R. Alexander to which you wish to respond.

A: In her direct testimony, Ms. Alexander set forth several recommended improvements to Aqua's quality performance standards in line with Aqua's previous commitments. (OCA St. 6). Specifically, Ms. Alexander recommended that Aqua be required to develop and submit a compliance plan to the stakeholders that, after review, should be submitted to the Commission for approval and implementation.[24] Ms. Alexander also recommended that, within 60 days of the final order, Aqua be required to take several steps to improve its customer service, including

[23] Id. at 44-45.
[24] OCA St. 6 at 4-6.

implementation of standardized training for field personnel authorized to terminated service that explicitly includes requirements to attempt personal connect with a responsible adult immediately prior to service termination, and the consumer protections associated with this required customer contact at the premises.[25]

Q: Do you support Ms. Alexander's recommendations to improve Aqua's quality performance and customer service standards?

A: Yes, I support Ms. Alexander's recommended improvements to Aqua's quality performance and customer service standards. I note that Ms. Alexander's recommendations – particularly the recommendation to improve Aqua's practices and training to ensure that Aqua is properly attempting personal contact with a responsible adult immediately prior to termination of service – is of particular importance to Aqua's low income customers, who face termination of services at higher rates compared to residential customers as a whole.[26] While I will not address each of Ms. Alexander's proposed improvements in detail in my rebuttal testimony, I reserve the right to respond to other parties' responses to Ms. Alexander's recommendations.

4. Conclusion

Q: Does this conclude your rebuttal testimony?

A: Yes, though I reserve the right to respond to rebuttal testimony submitted by other parties in this proceeding.

[25] Id.
[26] CAUSE-PA St. 1 at 56: 7-16.

CAUSE-PA STATEMENT 1-R, REBUTTAL TESTIMONY OF HARRY GELLER, ESQ.

APPENDIX A

CITED DISCOVERY RESPONSES

Witness: Georgetta Parisi-Knup
Date: October 19, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET I

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-I-28: Please describe how customers recertify for the Helping Hand program, and identify how often a customer must recertify for the program and what information and/or documentation a customer must provide to recertify for the program. Please provide a copy of any recertification forms or instructions provided to Helping Hand customers.

RESPONSE: The Helping Hand program does not have a recertification requirement.

Witness: Rita F. Black
Date: October 13, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

OFFICE OF CONSUMER ADVOCATE

DATA REQUEST SET V

DOCKET NOS. R-2021-3027385 & R-2021-3027386

OCA-V-29: Please provide a detailed list of each element of the Peoples Gas Customer Assistance Program (CAP), as included in the most recent Peoples Universal Service and Energy Conservation Plan (USECP), that was *not* incorporated into the proposed Aqua Pennsylvania low-income universal service program as a "best practice." Separately, provide a detailed explanation of why the element of the Peoples CAP was not considered to be a "best practice" to be incorporated into the Aqua PA proposal.

RESPONSE: Peoples Customer Assistance Program (CAP) and Aqua PA's proposal differ in the following ways:

- Calculation of current bill amount
- Arrearage forgiveness calculation
- Enrollment requirements
- Recertification

Calculation of Current Bill Amount – Peoples CAP payment is the lower of the customer's calculated percentage of income payment and the average bill amount. Aqua PA's proposal uses a discount design to calculate the current bill amount.

Arrearage Forgiveness (AF) Calculation – Peoples CAP utilizes a 36 month AF benefit which provides monthly credits, equal to 1/36th of the pre-program arrearage, for each monthly payment made. Aqua PA's proposal provides $25 per month in arrearage forgiveness benefits.

Enrollment Requirements – Peoples CAP requires income documentation from an interested customer to certify income eligibility for participation. This requirement is waived for customers who have recently received a grant from the Low Income Home Energy Assistance Program (LIHEAP) or

have provided income documentation to participate in another utility CAP program. Aqua PA's proposal uses self-declared income to determine eligibility.

Recertification – Peoples CAP requires recertification on an annual or biannual basis dependent on the type of income provided when the customer enrolled or was last recertified in the program. Aqua PA's proposal does not include a recertification requirement.

When considering the "best practices" of Peoples CAP in the design of Aqua PA's proposal, it was important to consider the differences in water versus natural gas consumption. This aspect is particularly important in the design of the current bill amount. Water usage typically trends flat over a year's time, with little to no fluctuation due to weather or seasons. Natural gas usage, however, is seasonal and Peoples CAP is limited to those who use natural gas for heating purposes. In designing an affordable payment for a natural gas customer, a percentage-of-income design is necessary to provide needed support to households that, through no fault of their own, often live in sub-par housing stock, have inefficient appliances, and otherwise tend to use a higher amount of natural gas annually than non-low-income families. The percentage-of-income model provides a stable monthly payment amount. If the calculated percentage-of-income amount is higher than the average bill for the home, the average bill is used as monthly payment amount. Because water bills do not have seasonal fluctuation, using a discount model to reduce the monthly payment amount improves affordability without the complexity of a percentage-of-income plan.

In addition to considering Peoples CAP "best practices", Aqua PA also considered the benefits provided by its existing Helping Hand program when designing the current proposal. Helping Hand provides a monthly credit of $25 when a payment in full is made. If Aqua PA were to incorporate the 1/36th method of Peoples CAP, many Helping Hand participants would see a reduction in their monthly benefit when payments are made. To encourage continued payment compliance, Aqua PA proposes to maintain Helping Hand's current method of $25 per month.

Peoples CAP's income and recertification requirements are standard for energy utility CAP programs and are consistent with §69.265 CAP Design Elements. When considering whether to require income documentation and recertification processes as are used in the Peoples CAP model, Aqua PA considered other utility water program practices. It is the Company's understanding that Pennsylvania American Water's CAP program, for example, does not require income documentation to begin participation, not does it require recertification to maintain participation. Reducing these barriers to participation is expected to increase the accessibility of

affordable water for low-income households of Aqua PA, and therefore, were considered a “best practice” in the design of Aqua PA’s proposal.

VERIFICATION

I, Harry Geller, Esq., hereby state that the facts set forth in CAUSE-PA St. 1-R, the Rebuttal Testimony of Harry Geller, Esq., 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 held in this matter. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsifications to authorities.)

Dated: December 2, 2021

Harry Geller, Esq.

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2021-3027385
	:	R-2021-3027386
Aqua Pennsylvania, Inc., and	:	
Aqua Pennsylvania Wastewater, Inc.	:	

DIRECT TESTIMONY OF HARRY S. GELLER

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA ("CAUSE-PA")

November 10, 2021

CAUSE-PA

STATEMENT 1

12/20/21 SB

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PREPARED DIRECT TESTIMONY OF HARRY S. GELLER

I. INTRODUCTION

Q: Please state your name, occupation, and business address.

A. My name is Harry S. Geller. I am an attorney. I am retired from my former position as the Executive Director of the Pennsylvania Utility Law Project (PULP), but have maintained an office at 118 Locust St., Harrisburg, PA, 17101, for the purpose of providing consulting services and assistance to low income individuals and the organizations which represent them in utility and energy matters.

Q: Briefly outline your education and professional background.

A. I received my B.A. degree from Harpur College, State University of New York at Binghamton in 1966, and a J.D. degree from Washington College of Law, American University in 1969. Upon graduation from law school, I entered the Volunteers in Service to America (VISTA) program, where I was assigned to the New York University Law School. I took courses in the Law School's Urban Affairs and Poverty Law program and worked with the Community In Action Program on the West Side of Manhattan in New York City from 1969-1971. In 1971, I started as a Staff Attorney for the New York City Legal Aid Society, Criminal Court, and Supreme Court Branches in New York County. In 1974, I moved to Pennsylvania and began working for Legal Services, Incorporated (LSI). LSI was a civil legal aid program serving Adams, Cumberland, Franklin, and Fulton Counties. I worked at LSI from 1974-1987 first as a Staff Attorney, then as Managing Attorney, and ultimately became Executive Director. Through a restructuring with other legal services programs, LSI became part of what is now known as MidPenn Legal Services and Franklin County Legal Services.

In 1988, I was hired to be the Executive Director of PULP, a statewide legal aid project dedicated to protecting the rights of low income utility customers. At PULP, I represented low income individuals with utility and energy concerns and supported organizations advocating for low income households in utility and energy matters. As the Executive Director, I consulted and co-counseled on a wide variety of individual utility consumer cases, and I participated in task forces, work groups and advisory panels, including serving as chair of the Department of Human Services' LIHEAP Advisory Committee and the Pennsylvania Public Utility Commissions' Consumer Advisory Committee. I frequently trained communities, legal aid staff, and advocacy groups across Pennsylvania about the various utility and energy matters affecting Pennsylvania's low income population. I retired from PULP on June 30, 2015. Since that time, I have continued to provide consulting services for PULP and its clients, as well as other organizations serving the low income community.

In sum, I have 50 years of experience working on behalf of households in poverty, including the past 30 years focusing specifically on utility and energy issues affecting low income consumers. My resume is attached as Appendix A.

Q: Please describe the focus of your work over the past fifty years, including relevant work experience on issues of low income families' ability to afford essential services such as utilities?

A: I have represented low income individuals and organizations serving low income populations in a wide variety of legal matters, including family law, public benefits, unemployment compensation, utility shut-offs, debtor/creditor, and housing-related disputes. Over

the past 30 years, my focus has been to ensure that low income households can connect to, afford, and maintain utility and energy services.

In all of these legal matters, I worked almost exclusively on behalf of individuals and households that subsist on incomes at or below 150% of the Federal Poverty Level (FPL). Through this work, I have had a close view of the daily lives of countless of our poorest citizens. I have spent hundreds, if not thousands, of hours assisting clients, combing through their budgets to see whether it is even possible to make ends meet. Over the years, I have consistently seen the near total absence of the ability of low income families to afford the most basic monthly necessities with the incomes they have, even assuming heroic self-control and conscientious budgeting and spending. Almost every month, my clients faced the stark reality of having to choose which bills they can forgo with the least drastic consequences.

In addition to my deep understanding of the daily monetary struggles facing poor families, I have an extensive knowledge of the array of programs designed to allow low income individuals to afford utility service. While at PULP, I was involved in hundreds of proceedings evaluating the effectiveness of programs that are intended to reduce low income households' utility burdens and help them conserve energy and water through efficiency and weatherization– thereby reducing utility costs and improving bill affordability. I have spent thousands of hours identifying the problems in Universal Service programs and making recommendations for changes to these programs to better serve low income consumers. This advocacy ultimately led to the recognition of the need to develop integrated and coordinated programs for low income consumers.

Over my decades of service, I played an instrumental role in the development, oversight, and monitoring of the initial pilot and then the statutorily required low income Universal Service

Programs, each of which is structured to provide a different form of complimentary assistance – working in tandem to enable low income customers to afford and maintain basic service. For example, the Customer Assistance Program (CAP) provides alternatives to traditional collection methods for low income, payment troubled utility customers, allowing participants to receive a more affordable bill and earn forgiveness on arrears in exchange for making in-full payments on their discounted bill. In turn, the Low Income Usage Reduction Program (LIURP) is a targeted weatherization program designed to assist low income households with the highest energy consumption, payment problems, and arrearages to reduce their overall energy consumption. CAP and LIURP work in tandem and are designed to assist low income households in maintaining affordable utility services and safe living environments while reducing utility collection, thereby benefitting other ratepayers and the communities in which they live and work.

Q: Have you testified in any proceeding before the Pennsylvania PUC?

A: Yes. I have presented testimony in many proceedings before the PUC, including Aqua's most recent base rate case and the PUC proceeding regarding Aqua's acquisition of Peoples Natural Gas Company (Peoples). A complete list is attached to my resume, which is attached as Appendix A.

Q: For whom are you testifying in this proceeding?

A. I am testifying on behalf of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA).

Q: What is the purpose of your testimony?

A: CAUSE-PA intervened in this proceeding to ensure that the proposed rate increase and rate design will not adversely affect the ability of low income customers of Aqua Pennsylvania, Inc.

and Aqua Pennsylvania Wastewater Inc. (Collectively Aqua) to connect to, maintain, and afford water and wastewater services, which is a critical component to a safe and healthy home. Most of my testimony will discuss the impact of Aqua's proposed water and wastewater rate increases on low income customers.

Q: How is your testimony organized?

A: My testimony is divided into five sections. First, I discuss Aqua's proposed residential rate increase, rate design, and rate structure, and explain the financial challenges that Aqua's proposals will present for economically vulnerable ratepayers. Next, I will discuss the steps that Aqua has taken in response to the COVID-19 pandemic and make recommendations about ways that Aqua can continue to help its customers that are struggling to regain economic stability due to the pandemic. Next, I assess the effectiveness of Aqua's current low income assistance program and the Company's newly proposed Customer Assistance Program (CAP) and make recommendations for how Aqua can improve the Program. After that, I will discuss aspects of Aqua's language access policies and make recommendations about ways the Company can better serve its non-English speaking consumers.

Q: Please briefly summarize the recommendations you make throughout your testimony.

A: In my following testimony, I make several recommendations to address current unaffordability and mitigate the financial impact of any proposed rate increase on low income households. I recommend the Commission order the following:

- Deny or substantially reduce the requested rate increase.
- To the extent that the Commission approves a rate increase, that increase should not take effect until Aqua takes steps to address the already unaffordable rates being charged to low

and moderate income households and until incoming federal stimulus dollars have been fully allocated and accounted for in calculating critical infrastructure costs.

- Require Aqua to suspend terminations, waive reconnection fees, and offer more lengthy payment arrangements, regardless of customer account history, for at least one year from the date of the final order in this rate case.
- Require Aqua to set forth a comprehensive and coordinated consumer outreach and education plan, expand its outreach to payment troubled customers, actively screen and solicit callers for enrollment in available assistance programs, and set concrete target enrollment numbers for all low income programs.
- Allow Aqua to implement its proposed CAP structure on a pilot basis to address immediate unaffordability for Aqua's low income customers and require that Aqua continue to assess bill affordability under its pilot program.
- Require Aqua to undertake an analysis of the water and wastewater burdens of its CAP customers at various usage levels after its CAP pilot program has been implemented for a full year.
- Require that Aqua allow those customers who enroll in CAP and who carry pre-program arrears to automatically access the benefits of arrearage forgiveness without a separate application.
- Require that Aqua develop a streamlined application and enrollment process, so that existing Helping Hands customers will be able to enroll in CAP without the need to resubmit information and/or documentation.

- Require that Aqua implement an alternative percent of forgiveness, rather than a flat forgiveness amount for its Helping Hand Program.
- Require that Aqua set its maximum hardship grant amount at $500 and revise its internal policies and procedures for informing customers about the availability of emergency grant assistance through the Hardship Fund Program.
- Require that Aqua maintain its annual shareholder hardship grant funding levels of $50,000 through, at minimum, its next base rate case, and rollover any unused hardship funds into hardship funding for the next program year.
- Require that Aqua translate all promotional and education materials into, at minimum, Spanish, identify resources and interpreter services for LEP customers, and conduct a language needs assessment to identify other commonly spoken languages across its broad service territory.
- Require that Aqua further develop and propose critical enhancements to its proposed comprehensive conservation and line repair program within 6 months of the date of the final order in this proceeding.
- Require that Aqua coordinate its conservation service delivery with other utilities in Aqua's service territory that operate energy efficiency and conservation programs, such as Low Income Usage Reduction Programs (LIURP) and Act 129 programs.
- Require Aqua to begin using a telephone interpretation service to ensure that consumers with limited English proficiency are able to be served in their primary language.

- Require that Aqua conduct a formal, county-specific needs assessment to determine whether it should expand its language access policies to include document translation in languages other than Spanish.
- Require that Aqua amend the language on all of its termination notices to indicate, in Spanish, that the document is a termination notice and inaction may result in the termination of water service.

II. AQUA'S RATE INCREASE PROPOSAL

a. Overview of Aqua's Rate Proposal

Q: Please summarize Aqua's requested rate increase as it applies to residential customers.

A: Aqua's proposed tariffs seek approval to increase total annual operating revenues of $97,684,824, or approximately 17.86%.[1] Aqua serves over 490,000 water and wastewater customers throughout Pennsylvania.[2] Aqua's service territory covers the four counties that surround the City of Philadelphia and dozens of municipalities spread across other counties throughout Pennsylvania.

Aqua's water and wastewater rate structures consist of multiple rate zones, each containing rate divisions with their own respective rates. As I will discuss later in my testimony, the precise impact of Aqua's proposed increase varies based on the type of service and rate zone. If the company's full request were to be approved, it would increase the residential water bill for a typical residential customer using 4,000 gallons per month from $69.35 to $81.32, an increase of $11.97

[1] Aqua, Base Rate Filing Vol. 1, Statement of Specific Reasons for Proposed Increase in Rates, at 1.
[2] Id. (This count includes all classes of water and wastewater customers).

a month – or approximately 17.3%.[3] The average monthly residential wastewater bill would increase from $55.51 to $73.95, an increase of $18.44 per month – or approximately 33.2%.[4] Thus, if Aqua's full request were approved, an average residential customer receiving both water and wastewater service from Aqua would see their combined monthly bill increase approximately from $124.86 to $155.27 a combined monthly increase of $30.41 – or 24.4%.[5] In certain rate zones, however, the rate impact is substantially higher – with water rate increases reaching $25.16 (44.8%) in CC Garden/Sand Springs Division and $27.57 (51.3%) in Mifflin Township Division,[6] and wastewater rates increasing $33.22 (83.6%) in Limerick Division, $26.87 (84.9%) in Whitpain Township Division, and $27.31 (37.4%) in New Garden Division.[7]

Q: Do the concerns that you raise in your testimony apply to both Aqua's water and wastewater customers?

A: Generally, yes - unless otherwise specified. However, Aqua has relatively few wastewater customers across its service territories – roughly 20,000 – compared to more than 379,000 water customers.[8] Therefore, my analysis and recommendations focus on Aqua's water customers, though I also provide recommendations which apply directly to Aqua's wastewater customers throughout my testimony.

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[3] Aqua Base Rate Filing Vol. 1, Press Release, August 20, 2021 at 2.
[4] Id.
[5] Id.
[6] Aqua Base Rate Filing Vol. 1, Ex. 5-A, Pt. II, Sched. 8.
[7] Aqua Base Rate Filing, Vol. 1, Ex. 5-B, Sched. WW-7.
[8] OCA II-3.

Q: As a preliminary matter, do you support the Company's proposal to increase rates?

A: No, I do not support the Company's proposal to increase rates, and I recommend substantial revision and mitigation of Aqua's proposals. I understand that Aqua must maintain operating expenses and infrastructure to provide safe and consistent water and wastewater services to customers; however, those costs should not be placed on vulnerable customers who already struggle to afford service. I do not believe that it is appropriate to raise rates for water and wastewater service without first ensuring that low and moderate income customers are able to receive affordable service under just and reasonable terms. This is especially true as Pennsylvania continues to struggle with the impacts of the COVID-19 pandemic. Continued access to water and wastewater service is vital to fighting the spread of COVID-19 and other diseases, and the economic impacts of the COVID-19 pandemic have fallen especially hard on vulnerable consumers, especially low income consumers, and communities of color.

Before Aqua is approved to raise rates, the Commission should require Aqua to take necessary steps to ensure that all households in its service territory are able to afford service under just and reasonable terms. Throughout my testimony, I provide a number of recommendations for how Aqua can better structure its services so that low income customers in its service territory are better able to maintain access to water and wastewater services to their home. These recommendations are critical to address affordability and access issues regardless of whether rates increase as a result of this proceeding, but it is even more vital to mitigate financial harm for economically vulnerable consumers if the Commission allows Aqua to increase its rates.

Q: What is the primary driver of Aqua's request for a rate increase?

A: Aqua claims that the rate increase is necessary to support "accelerated levels" of infrastructure investment, and asserts that it is currently investing approximately $325 million per year.[9]

Q: Do you have any comments regarding Aqua's level of claimed infrastructure?

A: While I recognize and appreciate the need for Aqua to have adequate funds to invest in system upgrades, I note that billions of dollars in federal stimulus funds for water and wastewater infrastructure investments was approved by the federal government through the Infrastructure Investment and Jobs Act (IIJA) just a few days before the deadline for filing this testimony.[10] Pennsylvania is projected to receive approximately $1.4 billion over the next five years to improve water infrastructure across the state through the IIJA.[11] While the extent to which these federal funds will be available to Aqua is not yet clear, I believe Aqua should have to pursue federal funding sources to support infrastructure investments before seeking to increase rates. Aqua's ratepayers should not pay for infrastructure investments twice – first through federal income tax and again through rates.

b. <u>Aqua's Proposed Rate Design</u>

Q: Briefly describe Aqua's proposed rate design.

A: Aqua's current rate structure for water and wastewater services consists of a monthly minimum (fixed) charge that varies by meter size and a volumetric charge that varies by customer

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[9] Aqua St. 1 at 4-5.
[10] H.R. 3684: Infrastructure Investment and Jobs Act, Division E, Sec. 50001 *et seq*. (Drinking Water and Wastewater Infrastructure Act of 2021), https://www.congress.gov/bill/117th-congress/house-bill/3684/text.
[11] Pennsylvania Infrastructure Investment and Jobs Act State Fact Sheet, https://www.whitehouse.gov/wp-content/uploads/2021/08/PENNSYLVANIA_Infrastructure-Investment-and-Jobs-Act-State-Fact-Sheet.pdf.

class and rate zone. Most of Aqua's customers are charged the rates applicable to its Main Division, which is designated Rate Zone 1.[12] In this case, Aqua is proposing to move several divisions equal or closer to Main Division rates. Aqua proposes to continue consolidating its water rate zones that represent acquired systems into the Main Division and proposes a similar model for its wastewater rates with the intent of gradually grouping and consolidating divisions.[13] This means that customers that are not currently charged Main Division rates will typically see a steeper increase as they are moved toward Main Division rates.

c. <u>Rate Impact on Low Income Households</u>

Q: How do utilities typically track the number of low income consumers in their service territory?

A: Pennsylvania's large public utilities typically track and assess their low income customer population two ways: estimated low income customers and confirmed low income customers. The "estimated low income" customer number is derived using local census data, scaled against residential customer counts in each county of the utility's service territory, to approximate the percentage of low income households in a utility's service territory. The method of deriving the "confirmed low income" number differs between utilities but is generally a count of those customers who have provided income documentation to the utility for purposes of applying for customer assistance programs or payment arrangements, or through application of the regulatory winter moratorium protections.

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[12] Aqua St. 1 at 28-29.
[13] Id.

Q: How many low income customers reside in Aqua's service territory?

A: Aqua reported having 21,495 identified low income customers as of October, 2021.[14] This represents approximately 5% of Aqua's total residential customers.[15] However, based on census data, Aqua estimates that nearly one in four households (106,823 out of 443,383 or 24.1%) in its service territory have income less than 200% FPL.[16] While both metrics show that a significant number of Aqua's customers have income at or below 200% FPL, the identified low income customer count provides only a limited assessment of the low income population – counting only the number of customers who have already affirmatively obtained assistance or otherwise reported their income level to the Company. Census-based estimated low income customer counts – which are proportionate to the number of residential customers in each county within Aqua's service territory – are far more accurate as a measure of poverty in a given service territory. Regardless of the measure applied, there are a substantial number of low income customers in Aqua's service territory.

Q: How much income must a household earn each month to be considered low income?

A: Generally, the Commission considers a "low income" customer to be any customer whose income is at or below 150% of the federal poverty level (FPL).[17] With some exceptions, most utility assistance programs require households to have income that is not greater than 150% FPL to qualify for bill discounts and/or arrearage forgiveness and no greater than 200% FPL to qualify for grant assistance. However, as all Aqua's low income programs are available to customers with

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[14] OCA II-3, Attach.
[15] Id.
[16] See Aqua St. 10, Ex. RFB-1; OCA II-3, Attach.
[17] See 52 Pa. Code §§ 54.72, 62.2 (defining low income customers for the purposes of electric and natural gas Universal Service programs and reporting).

1 income at or below 200% FPL, Aqua considers all customers reporting income at or below 200%
2 FPL as identified low income customers.[18]

3 The FPL is a measure of poverty based exclusively on the size of the household, but not
4 the composition of the household (i.e., whether the household consists of adults or children) or a
5 household's geography. As a baseline, a family of four at 200% FPL has a gross annual income of
6 $53,000, while a family of four at 50% FPL has a gross annual income of just $13,250.[19] For
7 comparison, a full time (40 hour/week) worker making minimum wage ($7.25/hour) has a gross
8 annual income of $15,080, assuming no time off. These income levels are much less than a
9 household needs to meet their basic expenses in any of the counties in Aqua's service territory.[20]

10 A benchmark often used to assess how much income a household needs to live without
11 assistance in Pennsylvania is called the Self Sufficiency Standard. This is a tool that measures the
12 income that a family must earn to meet their basic needs and consists of the combined cost of 6
13 basic needs – housing, child care, food, health care, transportation, and taxes – without the help of
14 public subsidies.[21] Unlike the federal poverty level, which does not change based on geographic
15 location or family composition, the Self Sufficiency Standard accounts for the varied costs of these
16 six basic needs in different geographical areas and for differently aged household members.[22] For
17 reference, the *average* Self Sufficiency Standard in Aqua's service territory for a family of four

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[18] CAUSE-PA I-4.
[19] U.S. Dept. of Health and Human Services, 2021 U.S. Federal Poverty Guidelines, available at https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines .
[20] Self Sufficiency Standard, http://www.selfsufficiencystandard.org/Pennsylvania.
[21] See PathWays PA, Overlooked and Undercounted 2019 Brief: Struggling to Make Ends Meet in Pennsylvania, available at: http://www.selfsufficiencystandard.org/Pennsylvania.
[22] See PathWays PA, Overlooked and Undercounted, How the Great Recession Impacted Household Self-Sufficiency in Pennsylvania, http://www.selfsufficiencystandard.org/sites/default/files/selfsuff/docs/PA2012.pdf.

1 with two adults and two school aged children is approximately $60,863 per year – nearly $9,000
2 more than a household with income at 200% FPL and nearly five times the amount a household
3 with 50% FPL makes in a given year.[23]

4 Aqua's identified low income customers and Helping Hand participants do not have
5 income that is even close to either of these figures. The average annual household income for the
6 Company's identified low income customers is approximately $21,176[24] and for Helping Hand
7 customers is $14,400.[25] These customers have far less than the amount needed to be self-sufficient
8 and to live without financial assistance. Therefore, unless proactive action is taken, any increase
9 in the cost of necessities, including the rates for water and wastewater service, will result in
10 increased unaffordability for low and moderate income households, and will result in a
11 corresponding increased rate of uncollectible expenses, service termination, and associated
12 hardships.

13 Note that these figures do not reflect any decrease in income for low income customers
14 from whom Aqua had already obtained income information prior to the COVID-19 crisis, but who
15 may have suffered decreased income due to the pandemic. Low income workers are less likely
16 than middle and higher income workers to have paid time off, such as sick time.[26] Many are low
17 wage and hourly workers who are employed in the service, hospitality, and retail sectors, which

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[23] Average Self Sufficiency Standard of all 37 Pennsylvania counties served by Aqua for a four-person household that includes two adults and two school aged children. See 2020 Pennsylvania Sufficiency Standard, available at http://www.selfsufficiencystandard.org/Pennsylvania.
[24] CAUSE-PA I-6.
[25] OCA V-9.
[26] 92% of workers in the top quarter of earnings (meaning hourly wages greater than $32.21) have access to some form of paid sick leave, versus only 51% of workers earning wages in the lowest quarter ($13.80 or less). See Drew Desilver, As coronavirus spreads, which U.S. workers have paid sick leave – and which don't?, Pew Research Center, March 12, 2020, available at https://www.pewresearch.org/fact-tank/2020/03/12/as-coronavirus-spreads-which-u-s-workers-have-paid-sick-leave-and-which-dont/.

were especially hard hit by the COVID-19 emergency closure of non-essential businesses, many of which have never reopened.[27]

These households already face significant challenges and struggle to pay their bills at current rates – let alone at increased rates. Any increase in rates will only exacerbate an already existing affordability gap – described more fully below – and will lead to one of two results: (1) higher rates of termination, which can lead to severe consequences - including homelessness, family separation, blight, and the spread of infections and disease, including COVID-19; or (2) more families foregoing other basic life necessities in order to prevent termination of their service.[28]

Q: What is the estimated economic impact of Aqua's proposed water rate increase on the residential customer class?

A: As noted earlier, the impact of Aqua's proposed residential water rate increase depends on usage and varies between rate zones. In Zone 1, which contains the majority of Aqua's water customers, the water bill for a typical customer using 4,000 gallons per month from $69.35 to

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[27] See Martina Hund-Mehjean & Marcela Escobari, Brookings, Our Employment System has Failed Low-Wage Workers. How Can We Rebuild (April 28, 2020), https://www.brookings.edu/blog/up-front/2020/04/28/our-employment-system-is-failing-low-wage-workers-how-do-we-make-it-more-resilient/.

> [W]orkers who earn low wages and do not have employer-sponsored health care account for 22 percent or 32 million of the country's workforce. In a crisis, these workers are least attached to their employer and thus the most likely to be laid off or have their hours reduced. And nearly 40 percent of them, 12.3 million individuals, work in the hospitality and retail sectors, the two sectors most immediately impacted by COVID-19-related layoffs.

Id.; see also Stephanie Deluca et al., Johns Hopkins Univ. of Medicine, The Unequal Cost of Social Distancing, https://coronavirus.jhu.edu/from-our-experts/the-unequal-cost-of-social-distancing.

[28] See Stephen Roll, David S. Mitchell, Krista Holub et al., Responses to and Repercussions from Income Volatility in Low- and Moderate-Income Households: Results from a National Survey, Aspen Institute EPIC, Ctr. for Social Development, Intuit Tax & Financial Center, at 6-7 (Dec. 2017), available at https://www.aspeninstitute.org/publications/responses-repercussions-income-volatility-low-moderate-income-households-results-national-survey/.

$81.32, an increase of $11.97 a month – or approximately 17.3%.[29] Table 1 shows the dollar and percentage bill impact for Main Division customers at various usage levels:

Table 1 – Residential Water Monthly Bill Impact – Main Division by Usage Level[30]

Usage	Current Monthly	Proposed Monthly	Dollar Increase	Percentage Increase
2,000 gal	$42.25	$49.38	$7.13	16.9%
3,000 gal	$55.80	$65.35	$9.55	17.1%
4,000 gal	$69.35	$81.32	$11.97	17.3%
5,000 gal	$82.91	$97.29	$14.38	17.4%

Aqua's other rate zones will see a steeper dollar and percentage increase as they are moved toward Main Division rates, with several zones experiencing increases of $25.00 or more per month and percentage increases as high as 51%.[31] This would be a sudden and severe increase for low income households in these rate zones, which they cannot afford to shoulder. Table 2 shows the dollar and percentage bill impact for residential customers using 4,000 gallons in each Rate Zone:

[29] See Aqua Ex. 5-A Part II, Sched. 8.
[30] See id.
[31] Id.

Table 2 – Residential Water Bill Impact by Rate Zone at Average Usage (4,000 gal)[32]

Zone/Division	Current Monthly	Proposed Monthly	Dollar Increase	Percentage Increase
RZ1-RZ3 - Main Division	$69.35	$81.32	$11.97	17.3%
RZ1 - CC Garden/Sand Springs	$56.16	$81.32	$25.16	44.8%
RZ1 - Beech Mountain	$33.82	$47.03	$13.21	39.1%
RZ1 - Bristol Twsp.	$40.85	$56.70	$15.85	38.8%
RZ1 - Robin Hood Lakes	$56.33	$81.32	$24.99	44.4%
RZ1 - Mifflin Twsp.	$53.75	$81.32	$27.57	51.3%
RZ1 - Mount Jewett	$65.14	$81.32	$16.18	24.8%
RZ2 - Chalfont	$65.14	$81.32	$16.18	24.8%
RZ2 - Concord Park	$46.66	$64.66	$18.01	38.6%
RZ2 - Treasure Lake	$42.70	$59.22	$16.52	38.7%
RZ3 - Bunker Hill	$27.95	$38.44	$10.49	37.5%
RZ3 - Phoenixville	$16.48	$22.66	$6.18	37.5%

Q: What is the estimated financial impact of Aqua's proposed wastewater rate increase on the residential customer class?

A: The residential monthly bill increase for Aqua wastewater customers varies widely between rate zones. At one end, Newlin Green Division will receive a $5.06 (3.4%) monthly decrease, while at the other end, Limerick division will see a $33.22 (83.61%) monthly increase.[33] Table 3 shows the dollar and percentage bill impact for residential customers using 4,000 gallons in each Rate Zone:

[32] Id.
[33] Aqua Ex. 5-B, Sched. WW-7.

Table 3 – Residential Wastewater Bill Impact by Rate Zone at Average Usage (4,000 gal)[34]

Zone/Div	Current Monthly	Proposed Monthly	Dollar Increase	Percentage Increased
RZ1 - Media	$64.47	$77.49	$13.02	20.2%
RZ1 - Bridlewood/Eagle Rock	$64.47	$77.49	$13.02	20.2%
RZ1A - Treasure Lake, Vilaffe, Bunker Hill	$59.01	$77.49	$18.48	31.3%
RZ1B - Penn Twsp	$64.05	$77.49	$13.44	21%
RZ2 - Emlenton, Rivercrest, W.Haven	$71.82	$77.49	$5.67	7.9%
RZ3 - Beech Mtn, DK, LL, LG, SC, Thornhurst, WW	$84.00	$101.03	$17.03	20.3%
RZ4 - Honeycroft, LH, ND, PV, TT, TH	$105.00	$125	$20	19.1%
RZ5 - E. Bradford, LW, GPO, Plumsock	$118.02	$141.94	$23.92	20.3%
RZ5 - Newlin Green	$147.00	$141.94	($5.06)	-3.4%
RZ6 - Masthop	$45.82	$55.15	$9.33	20.4%
RZ7 - Limerick	$39.73	$72.94	$33.22	83.6%
RZ8 - E Bradford (Single Fam.)	$71.49	$83.42	$11.93	16.7%
RZ8 - E Bradford (Townhome)	$55.36	$83.42	$28.06	50.7%
RZ9 - Cheltenham	$36.53	$49.34	$12.81	35.1%
RZ10 - E. Norriton	$38.52	$58.53	$20.01	51.9%
RZ10 - Whitpain	$31.66	$58.53	$26.87	84.9%
RZ10 - N Heidelberg	$60.26	$70.76	$10.50	17.4%
RZ11 - New Garden	$73.03	$100.34	$27.31	37.4%

Q: How would Aqua's proposed rate increase impact vulnerable households?

A: Raising rates for life-sustaining water and wastewater utility service will detrimentally impact low income households and disproportionately impact consumers in vulnerable communities in Aqua's service territory. This negative effect is accentuated by the continuing economic and public health crisis. Low income customers already struggle to afford service at

[34] Id.

1 current rates. The substantial rate increase proposed by Aqua is likely to cause increased
2 terminations of economically vulnerable consumers or, in the alternative, will cause economically
3 vulnerable households to go without other critical life necessities such as food, medicine, heat, and
4 childcare in order to afford water and wastewater service.

5 Water service termination is akin to eviction from a home, as the home may be deemed
6 uninhabitable or even condemned, forcing families to vacate with little to no notice.[35] Termination
7 of service to the home can jeopardize a parent's custody of their children and is often cited as a
8 cause of evictions from private and public housing -- leading to increased rates of homelessness.[36]
9 Water shutoffs also pose a threat to public health and human dignity because without access to
10 running water, families are unable to cook, bathe, clean, or flush their toilets.[37] Access to water
11 service is tied directly to the health and well-being of the household, and the habitability of the
12 home.[38] Consistent and affordable access to water and wastewater services has shown to have
13 numerous benefits to communities as a whole. Having affordable access to such services has been
14 linked to healthier child development, decreasing homelessness, and improving affordability of
15 public and private housing.[39] Thus, low income consumers, who lack the means to afford their
16 monthly expenses, experience involuntary utility terminations at a higher rate than households

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[35] Coty Montag, Water/Color: A Study of Race and the Water Affordability Crisis in America's Cities, NAACP Legal Defense and Educational Fund, Inc, May 2019 ,at p. 28, (hereinafter "Water/Color Report") available at: https://www.naacpldf.org/wp-content/uploads/Water_Report_FULL_5_31_19_FINAL_OPT.pdf

[36] See Joint State Government Commission, General Assembly of the Commonwealth of Pennsylvania, Homelessness in Pennsylvania: Causes, Impacts, and Solutions: A Task Force and Advisory Committee Report (2016), available at: http://jsg.legis.state.pa.us/resources/documents/ftp/documents/HR550%201%20page%20summary%204-6-2016.pdf.

[37] Water/Color Report at 28.

[38] Id.

[39] See UUSC, Patricia Jones et al., The Invisible Crisis: Water Unaffordability in the United States (May 2016), available at: http://www.uusc.org/sites/default/files/the_invisible_crisis_web.pdf .

1 with the financial means to pay. Those economically disadvantaged households who prioritize
2 expenses to pay for water and wastewater services, given the serious ramifications of termination,
3 do so by foregoing other critical needs like food and medicine.[40] This is a choice no low income
4 Pennsylvania utility customer should be forced to make.

5 Before COVID-19, approximately one-third of households experienced income
6 volatility.[41] Analysis of material hardship for low and moderate income consumers experiencing
7 income volatility found much higher rates of inability to afford bills, medical care, housing
8 payments and food,[42] and a higher likelihood to resort to expensive payday loans to pay for basic
9 living expenses.[43] At Aqua's current rates, many families already must make difficult choices of
10 paying for utility services and other basic necessities – raising rates for such consumers will make
11 their ability to afford such necessities more difficult.

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[40] Water/Color Report at 28. Even excluding the threat of termination, increased water and wastewater costs cause low income families to make impossible choices to pay for other critical needs (such as food, rent, heat, electricity, or medicine. Id.

[41] Daniel Schneider and Kristen Harknett, Income Volatility in the Service Sector: Contours, Causes and Consequences (July 2017) at p.3, available at: http://www.aspenepic.org/epic-issues/income-volatility/issue-briefs-what-we-know/issue-brief-income-volatility-service-sector/; Board of Governors of the Federal Reserve, Report on the Economic Well-Being of U.S. Households in 2018 (May 2019) at p.2, (hereinafter "Income Volatility in the Service Sector"), available at: https://www.federalreserve.gov/consumerscommunities/files/2018-report-economic-well-being-us-households-201905.pdf.

[42] Stephen Roll, David S. Mitchell, Krista Holub et al., Responses to and Repercussions from Income Volatility in Low- and Moderate-Income Households: Results from a National Survey, Aspen Institute EPIC, Center for Social Development, Intuit Tax & Financial Center (Dec. 2-17) at pp 6-7, available at: https://www.aspeninstitute.org/publications/responses-repercussions-income-volatility-low-moderate-income-households-results-national-survey/.

[43] Income Volatility in the Service Sector at p. 9 (almost a quarter of consumers reporting week-to-week volatility report using payday lenders).

d. Analysis of Rate Affordability for Low Income Households

Q: How is water and wastewater affordability measured?

A: The accepted metric used to determine the affordability of utility service is referred to as the household's utility bill burden - meaning the percentage of a customer's household income required to cover the cost of the bill.[44] In the context of water and wastewater affordability, the household utility burden is referred to as the household water and wastewater burden. According to a study conducted by Roger Colton, which Aqua utilized in development of its low income programs, a household's *combined* household water and wastewater burden should be no greater than the following percentage of income to be considered "affordable": 4.5% for households between 150-200% FPL, 4% for households between 100-149% FPL, 3.5% for households between 50-99% FPL, and 3% for households between 0-49% FPL%.[45] As I will explain in more detail below, Aqua's proposed rates exceed these levels of affordability for many customers, especially those at the lowest levels of income. It is therefore critical that Aqua take necessary steps to address this affordability gap. I will discuss recommended improvements to its low income programing later in my testimony.

Q: What are the current water and wastewater burdens for Aqua's low income customers?

A: The water and wastewater burdens for Aqua customers vary between rate zones and divisions, but even at current rates, Aqua's lowest income customers are subject to unaffordable

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[44] See Aqua St. 10 at 6-7; see also Roger Colton, The Affordability of Water and Wastewater Service In Twelve U.S. Cities: A Social, Business and Environmental Concern, The Guardian, (May 2020), available at: https://www.theguardian.com/environment/2020/jun/23/full-report-read-in-depth-water-poverty-investigation

[45] See Aqua St. 10 at -6-7; see also Roger Colton, The Affordability of Water and Wastewater Service In Twelve U.S. Cities at 8 .

water and wastewater burdens. These excessive bill burdens fall especially hard on customers in the lowest income tiers and smallest household sizes, such as single parent families, who are at high risk of financial hardship which may impact on psychological wellbeing.[46] If Aqua seeks to further increase its rates, it must first address the affordability challenges facing these households.

Table 4 shows the current water burdens for Aqua customers at or below poverty level (50% and 100% FPL) at average usage rates (4,000 gal. / month), disaggregated by rate zone and household size.

Table 4 – Aqua Water Burdens by Rate Zone at Current Rates[47]

Zone/ Division	Current Rate	50% FPL HHD of 2 $725/mo.	50% FPL HHD of 4 $1104/mo.	100% FPL HHD of 2 $1452/mo.	100% FPL HHD of 4 $2208/mo.
RZ1-RZ3 - Main Division	$69.35	10%	6%	5%	3%
RZ1 - CC Garden/ Sand Springs	$56.16	8%	5%	4%	3%
RZ1 - Beech Mountain	$33.82	5%	3%	2%	2%
RZ1 - Bristol Twp.	$40.85	6%	4%	3%	2%
RZ1 - Robin Hood Lakes	$56.33	8%	5%	4%	3%
RZ1 - Mifflin Twp.	$53.75	7%	5%	4%	2%
RZ1 - Mount Jewett	$65.14	9%	6%	4%	3%
RZ2 - Chalfont	$65.14	9%	6%	4%	3%
RZ2 - Concord Park	$46.66	6%	4%	3%	2%
RZ2 - Treasure Lake	$42.70	6%	4%	3%	2%
RZ3 - Bunker Hill	$27.95	4%	3%	2%	1%
RZ3 - Phoenixville	$16.48	2%	1%	1%	1%

[46] Rebecca Jayne Stack, Alex Meredith, The Impact of Financial Hardship on Single Parents:An Exploration of the Journey From Social Distress to Seeking Help, J. Fam. Econ. Iss., October 2017 available at: https://link.springer.com/content/pdf/10.1007/s10834-017-9551-6.pdf.

[47] Aqua Base Rate Filing Vol. 1, Ex. 5-A, Pt. II, Sched. 8.; for federal poverty data see U.S. Dept. of Health and Human Services, 2021 U.S. Federal Poverty Guidelines, available at: https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines.

Table 5 shows the current wastewater burdens for Aqua customers at or below poverty level (50% and 100% FPL) at average usage rates (4,000 gal./month), disaggregated by rate zone and household size.

Table 5 – Aqua Wastewater Burdens by Rate Zone at Current Rates[48]

Zone/ Division	Current Rate	50% HHD 2 $725	50% HHD 4 $1104	100% HHD 2 $1452	100% HHD 4 $2208
RZ1 - Media	$64.47	9%	6%	4%	3%
RZ1 – Bridlewood Eagle Rock	$64.47	9%	6%	4%	3%
RZ1A – TL, Vil, BH	$59.01	8%	5%	4%	3%
RZ1B - Penn Twp.	$64.05	9%	6%	4%	3%
RZ2 – Emlenton, Rivercrest, W. Haven	$71.82	10%	7%	5%	3%
RZ3 - Beech M. DK, LL, LG, SC, Thorn.	$84.00	12%	8%	6%	4%
RZ4 – Honeycrest. LH, ND, PV, TT,	$105.00	14%	10%	7%	5%
RZ5 – E. Bradford., LW, GPO, Plumsock	$118.02	16%	11%	8%	5%
RZ5 - Newlin Green	$147.00	20%	13%	10%	7%
RZ6 - Masthope	$45.82	6%	4%	3%	2%
RZ7 - Limerick	$39.73	5%	4%	3%	2%
RZ8 - E Bradford (Single Fam.)	$71.49	10%	6%	5%	3%
RZ8 - E Bradford (Townhome)	$55.36	8%	5%	4%	3%
RZ9 – Cheltenham.	$36.53	5%	3%	3%	2%
RZ10 - E. Norriton	$38.52	5%	3%	3%	2%
RZ10 - Whitpain	$31.66	4%	3%	2%	1%
RZ10 - N Heidlbrg	$60.26	8%	5%	4%	3%
RZ11 - New Garden	$73.03	10%	7%	5%	3%

As shown in these tables, the *combined* water and wastewater burdens for customers with income at or below 100% substantially exceed the recommended maximum combined water/wastewater burden levels cited in Aqua's testimony, which again are 3.5% for households

[48] Aqua Base Rate Filing Vol. 1, Ex. 5-B, Sched. WW-7; for federal poverty level see U.S. Dept. of Health and Human Services, 2021 U.S. Federal Poverty Guidelines, available at: https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines

between 50-99% FPL, and 3% for households between 0-49% FPL%.[49] For example, the current water burden for a two-person household with income at or below 50% FPL *at average usage rates* (4,000 gal./mo.) in Aqua's Main Division (Rate Zones 1-3) currently have a water burden of 10% of their monthly income. This water burden alone is more than triple the 3% maximum recommended *combined* water and wastewater burden for this group of customers.[50] Even though these smaller households may use less water than average, even at half the level of average usage (2,000 gal./mo.), the water burden itself for these households is more than double the level considered affordable for combined water and wastewater service for these households.

The water burden alone for a household of four with income at or below 50% FPL with average usage at Aqua's Main Division rates is 6%, which is double the recommended maximum combined water and wastewater burden. The addition of wastewater adds further to the affordability issues facing these households. These customers could see an additional wastewater burden of anywhere from 3% to upwards of 10%, even as high as 20% depending on rate division. Likewise, for two person households paying Aqua's Main Division water rates, the water burden itself (5%) substantially exceeds the recommended combined water and wastewater burden (3.5%). Although the burden for larger households is slightly lower, the water burden alone for a four person household at 100% FPL at Aqua's Main Division rates, (3%) is nearly as high as the recommended combined burden (3.5%). As I will explain in the next section of my testimony, Aqua's proposed rate increase will push affordability of rates for these customers even further out of reach

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[49] See Aqua St. 10 at -6-7; see also Roger Colton, The Affordability of Water and Wastewater Service In Twelve U.S. Cities at 8 .
[50] See Aqua St. 10 at 7.

Q: What would the applicable water and wastewater burdens be for low income customers at Aqua's proposed rates?

A: If Aqua's rate increase is approved as proposed, it will worsen the affordability challenges facing water and wastewater customers in the lowest income tiers and smaller households described above.

For water customers, the increase to Main Division rates will increase existing unaffordability for customers described above. The increased bill burdens will also be especially pronounced for low income households in the several divisions that are proposed to have rates consolidated with Main Division. Table 6 shows the water burdens for Aqua customers at or below poverty level (50% and 100% FPL), disaggregated by rate zone at proposed rates and average usage levels (4,000 gal/month).

Table 6 – Aqua Water Burdens by Rate Zone at Proposed Rates[51]

Zone/ Division	Proposed Rate	50% FPL HHD of 2 $725/mo.	50% FPL HHD of 4 $1104/mo.	100%FPL HHD of 2 $1452/mo.	100%FPL HHD of 4 $2208/mo.
Main Division	$81.32	11%	7%	6%	4%
RZ1 - CC Garden/ Sand Springs	$81.32	11%	7%	6%	4%
RZ1 - Beech Mountain	$47.03	6%	4%	3%	2%
RZ1 - Bristol Twp.	$56.70	8%	5%	4%	3%
RZ1 - Robin Hood Lakes	$81.32	11%	7%	6%	4%
RZ1 - Mifflin Twp.	$81.32	11%	7%	6%	4%
RZ1 - Mount Jewett	$81.32	11%	7%	6%	4%
RZ2 - Chalfont	$81.32	11%	7%	6%	4%
RZ2 - Concord Park	$64.66	9%	6%	4%	3%
RZ2 - Treasure Lake	$59.22	8%	5%	4%	3%
RZ3 - Bunker Hill	$38.44	5%	3%	3%	2%
RZ3 - Phoenixville	$22.66	3%	2%	2%	1%

[51] Aqua Base Rate Filing Vol. 1, Ex. 5-A, Pt. II, Sched. 8.; for federal poverty data see U.S. Dept. of Health and Human Services, 2021 U.S. Federal Poverty Guidelines, available at: https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines.

Similarly, for wastewater customers, the bill burdens resulting from Aqua's proposed increase will vary widely between rate zones and divisions, and the increased burden will be especially acute in certain divisions. Table 7 shows the wastewater burdens for Aqua customers at or below poverty level (50% and 100% FPL), disaggregated by rate zone at proposed rates and average usage levels (4,000 gal/month).

Table 7 – Aqua Wastewater Burdens by Rate Zone at Proposed Rates[52]

Zone/ Division	Proposed Rate	50% HHD 2 $725	50% HHD 4 $1104	100% HHD 2 $1452	100% HHD 4 $2208
RZ1 - Media	$77.49	11%	7%	5%	4%
RZ1 – Bridlewood Eagle Rock	$77.49	11%	7%	5%	4%
RZ1A – TL, Vil, BH	$77.49	11%	7%	5%	4%
RZ1B - Penn Twp.	$77.49	11%	7%	5%	4%
RZ2 – Emlenton, Rivercrest, W. Haven	$77.49	11%	7%	5%	4%
RZ3 - Beech M. DK, LL, LG, SC, Thorn.	$101.03	14%	9%	7%	5%
RZ4 – Honeycrest. LH, ND, PV, TT,	$125.00	17%	11%	9%	6%
RZ5 – E. Bradford., LW, GPO, Plumsock	$141.94	20%	13%	10%	6%
RZ5 - Newlin Green	$141.94	20%	13%	10%	6%
RZ6 - Masthope	$55.15	8%	5%	4%	2%
RZ7 - Limerick	$72.94	10%	7%	5%	3%
RZ8 - E Bradford (Single Fam.)	$83.42	12%	8%	6%	4%
RZ8 - E Bradford (Townhome)	$83.42	12%	8%	6%	4%
RZ9 – Cheltenham.	$49.34	7%	4%	3%	2%
RZ10 - E. Norriton	$58.53	8%	5%	4%	3%
RZ10 - Whitpain	$58.53	8%	5%	4%	3%
RZ10 - N Heidlbrg	$70.76	10%	6%	5%	3%
RZ11 - New Garden	$100.34	14%	9%	7%	5%

As explained above, rates are already unaffordable for customers in the lowest income tiers, greatly exceeding the 3%-3.5% *combined* water and wastewater burden target for these

[52] Aqua Base Rate Filing Vol. 1, Ex. 5-B, Sched. WW-7; for federal poverty data see U.S. Dept. of Health and Human Services, 2021 U.S. Federal Poverty Guidelines, available at: https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines.

income tiers. The additional cost imposed by Aqua's proposed rate increase will push rates even further out of reach for these customers. Thus, Aqua should not increase the rates charged to these households until it takes steps to address the already unaffordable rates being charged to low income households in the lowest income tiers and also to mitigate the impact of any proposed increase. I will make several recommendations about ways to address the challenges facing low income customers in Section IV of my testimony.

III. AQUA'S COVID-19 RESPONSE MEASURES

Q: Did Aqua make any changes to its policies and procedures impacting low income customers in response to the COVID-19 pandemic?

A: Yes. Pursuant to the March 12, 2020 Emergency Order of the Pennsylvania Public Utility Commission, Docket No. M-2020-3019244, Aqua ceased all payment-related terminations of residential accounts through early 2021.[53] Additionally, Aqua indicates that it implemented several temporary measures in response to the COVID-19 pandemic, though it was unclear what those temporary measures included – and whether Aqua provided consumers with anything beyond the protections already mandated by the Commission.[54] Aqua also notes in response to discovery that Helping Hand participants were not removed from the Program from May 2020 through June 2021 due to COVID-19.[55]

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[53] Aqua St. 1 at 22-23.
[54] Id. at 38.
[55] CAUSE-PA III-12.

Q: Has Aqua monitored the effects of the COVID-19 pandemic on its low income customers?

A: Only to a limited degree. Aqua continues to collect data related to its residential customers.[56] Aqua also continues to provide regular reporting to the Commission related to at-risk accounts, arrearage levels, and terminations at Docket No. M-2020-3019244. The Company, however, has not analyzed the impact of COVID-19 on bill affordability for low income customers or residential customers as a whole.[57]

Q: Is there evidence that Aqua's residential customers have experienced increased difficulty with bill affordability during the COVID-19 pandemic?

A: Yes. Residential customers have substantially increased usage, carry substantially greater levels of debt, and face substantially higher rates of termination since the expiration of the Commission's emergency moratorium on utility terminations across the state.

First, Aqua indicates that the COVID-19 pandemic caused an increase in customer usage levels in 2020 and the beginning of 2021 as a result of shut-downs necessitated by the pandemic – adding to already unaffordable household expenses for low income families.[58]

Second, as a result of profound economic impacts of the pandemic, residential customers have accrued substantially higher levels of debt since the pandemic began.[59]

In response to discovery, Aqua indicates the following increasing trends in arrearage levels of its residential customers:

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[56] See OCA II-21, 22.
[57] CAUSE-PA III-22.
[58] Aqua St. 1 at 5-6.
[59] Id. at 23.

Table 8: Average arrears of identified low income residential customers/ residential accounts: 2019- Sept. 2021[60]

	2019	2020	2021*
Average arrears of identified low income residential accounts in arrears	$466.55	$574.49	$810.94
Average arrears of residential accounts in arrears (calculated in spreadsheet)	$195.15	$252.75	$334.79

*****data available through September 2021.

As Table 8 shows, the average arrearage levels of residential accounts have continued to substantially increase after the onset of the COVID-19 pandemic.

Aqua similarly reported increasing trends in arrearage levels to the Commission at Docket No. M-2020-3019244. In its October 15, 2021 report, Aqua reported the following increasing trend in aggregated arrearage levels amongst residential customers:

Table 9: Residential Aggregate Arrears – Sept. 2019, 2020, 2021[61]

	Sept. 2019	Sept. 2020	Sept. 2021
Residential Arrears	$9,684,840	$13,720,493	$13,915,184

As Table 9 shows, the aggregate level of arrears amongst residential customers has sharply risen since 2019. These increases in arrearage levels are significant and underscore the need to drastically improve access and affordability offered by Aqua's low income programs, as well as

[60] OCA II-21, Attach.; OCA II-22, Attach.
[61] Public Utility Service Termination Moratorium – March 18, 2021 Order - Reporting Requirements, Letter, Docket No. M-2020-3019244, available at: https://www.puc.pa.gov/pcdocs/1722609.pdf (October 15, 2021).

the need to establish mitigation measures to specifically address those low income customers who have had difficulty paying their bills during the COVID-19 pandemic.

Q: Does available data indicate any disparities in the difficulties faced by low income households during the COVID-19 pandemic?

A: Yes. Aqua's identified low income customers have incurred particularly sharp increases in average arrearage levels – experiencing a 74% increase in average arrearage levels from 2019 to September 2021.[62] In addition to substantial increases in consumer debt, Aqua's low income customers have faced increased terminations since the Commission's emergency moratorium was lifted – at rates higher than residential customers as a whole. In 2020, Aqua reports that 235 identified low income customers were terminated for nonpayment; whereas, in 2021, Aqua reports that 1,546 identified low income customers were terminated for nonpayment.[63] Notably, in 2021, identified low income customers represent 23% of terminations for non-payment amongst residential customers, despite the fact that identified low income customers only constitute 5% of residential accounts.

Q: Do you have any recommendations to help Aqua's low income customers in light of the ongoing COVID-19 pandemic?

A: Yes. There are a number of specific steps that Aqua should take – regardless of whether any rate increase is ultimately approved in this case – to help its low income customers that have

[62] Public Utility Service Termination Moratorium – March 18, 2021 Order - Reporting Requirements, Letter, Docket No. M-2020-3019244, available at: https://www.puc.pa.gov/pcdocs/1722609.pdf (October 15, 2021).
[63] OCA II-9(b).

1 experienced disproportionate levels of arrears and difficulty paying their bills during the COVID-
2 19 pandemic.

3 First, I recommend that Aqua suspend terminations and offer more lengthy payment
4 arrangement standards – regardless of prior broken arrangements – for at least one year from the
5 date of the final order in the current rate case. This would allow time for the Low Income
6 Household Water Assistance Program (LIHWAP) to be fully implemented and accessible to help
7 ensure vulnerable households can maintain service to their home by helping resolve unprecedented
8 levels of water/wastewater debt accrued during the pandemic. LIHWAP is a federally funded
9 COVID-19 emergency relief program, authorized by the Consolidated Appropriations Act of 2021
10 and the American Rescue Plan Act of 2021.[64] Pennsylvania received a combined $43.25 million
11 through the two Acts to provide emergency assistance to low income families to maintain water
12 and wastewater service, which was allocated to the Pennsylvania Department of Human Services
13 (DHS) for design and administration of the program.[65] DHS plans to open the program on January
14 4, 2022, and will provide grants of up to $2,500 to prevent termination of water and wastewater
15 services to low income households.[66]

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[64] See US Dep't of Human Services, Administration for Children & Families, Office of Community Services, LIHWAP Laws and Regulations, available at: https://www.acf.hhs.gov/ocs/law-regulation/lihwap-laws-and-regulations.

[65] See US Dep't of Human Services, Administration for Children & Families, Office of Community Services, FY 2021 Allocation of Low income Household Drinking Water and Wastewater Emergency Assistance Program (LIHWAP Funds to States and Territories under the Consolidated Appropriations Act, 2021 (PL 116-260) and the American Rescue Plan Act of 2021 (PL 117-2), https://www.acf.hhs.gov/sites/default/files/documents/ocs/COMM_LIHWAP_FundingReleaseDCLAtt1_StatesTerrs_052621_0.pdf; see also Pa. Fiscal Code, PL 343, No. 176 (HB 1348), Article I-G

[66] Pa. Department of Human Services, Water Assistance Program/LIHWAP, available at: https://www.dhs.pa.gov/Services/Assistance/Pages/LIHWAP.aspx.

The purpose and policy goal of Chapter 56, which governs residential billing, collections, and terminations, references the ability to provide functional alternatives to termination and requires that the Chapter be liberally construed to fulfill its purpose and policy and to ensure justice for all concerned.[67] In this instance, when there is significant funding about to come to low income households that is intended to provide emergency assistance to resolve unprecedented debts, it would be contrary to the Commission's regulatory policy, administratively inefficient, and unconscionable to allow terminations to move forward when relief is on its way.

I also recommend that Aqua waive its reconnection fees for one year from the final order in the current rate case. While Aqua has indicated that it has worked to provide increased flexibility to its low income customers, it is essential that consumers attempting to reconnect to crucial and life-sustaining services are able to do so without facing fees which create unnecessary barriers to reconnection and which will compound their acute financial hardship. Indeed, all Aqua customers benefit by the increased public health and safety benefits of service reconnection within the Aqua territory when their neighbors can readily connect to and maintain water and wastewater services critical to maintaining healthy households.

Finally, I recommend that Aqua expand its outreach to payment troubled customers, and actively screen and solicit callers for enrollment in available assistance programs. Specifically, I recommend that Aqua be required to immediately undertake specific outreach related to its low income programs, including: (1) screening customers seeking reconnection, or in danger of termination, for eligibility for low income programs, and developing appropriate policies, procedures, and training related to this screening; (2) developing and sending a letter, which

[67] 52 Pa. Code § 52.1(a).

includes low income program applications, to identified low income customers who are not enrolled in a low income program; (3) placing outbound calls to all payment troubled customers; and (4) developing policies, procedures, training materials, and call scripts related to these outbound calls. As discussed below, I also recommend that Aqua develop a community outreach plan to target the most hard-hit and at-need communities from the COVID-19 pandemic. Such a plan should be developed in conjunction with interested parties and stakeholders through Aqua's Helping Hand Collaborative to best target areas of need in Aqua's service territory. I recommend that Aqua also work with its stakeholders through its Helping Hand Collaborative to determine what methods of outreach might be most effective in order to inform impacted communities about the availability of assistance programs.

IV. AQUA'S LOW INCOME ASSISTANCE PROGRAMS

a. <u>Customer Assistance Program</u>

i. Proposal to Implement a Customer Assistance Program

Q: Is Aqua proposing in this rate proceeding to implement a Customer Assistance Program (CAP)?

A: Yes. Aqua proposes to implement a CAP, which will be available to both water and wastewater customers.[68]

[68] Aqua St. 10 at 7: 11-18.

Q: Please briefly summarize Aqua's CAP proposal.

A: Aqua is proposing to structure its CAP as a bill discount program, which will provide tiered discounts for the following three income tiers: 0-100% FPL, 101-150% FPL, and 151-200% FPL.[69] As described in Aqua Exhibit RFB-2, CAP customers would receive the following discounts:

Water	**Wastewater**
Base Facility Customer Charge Discount: • **Tier 1-3:** 100%	Base Facility Customer Charge Discount: • **Tier 1:** 75% • **Tier 2:** 65% • **Tier 3:** 50%
Consumption Charge Discount: • **At or below 100% FPL:** 100% discount on first 2,000 gallons • **Between 101-150% FPL:** 50% discount on consumption charge of first 2,000 gallons • **Between 151-200% FPL:** 0% discount on consumption	Consumption Charge Discount: • **At or below 100% FPL:** 100% discount on first 2,000 gallons • **Between 101-150% FPL:** 50% discount on consumption charge of first 2,000 gallons • **Between 151-200% FPL:** 0% discount on consumption

In addition to and in coordination with CAP, Aqua is also proposing substantial changes to its arrearage management program, known as Helping Hand. This aspect of Aqua's proposal is discussed in more detail in the following section of my testimony, though I note it here because I will reference the proposal in relation to Aqua's CAP proposal.

Q: Do you support Aqua's proposal to implement a CAP?

A: Yes, I strongly support Aqua's proposal to implement a CAP. As discussed above in Section II and III, Aqua's low income customers face growing levels of unaffordability which

[69] Aqua St. 10 at 7: 3-10.

must be addressed to ensure that all families residing in Aqua's service territory can access and maintain safe and stable water and wastewater services to their home. That said, as I outline below in further detail, I am concerned that the design of Aqua's CAP proposal may not provide an equitable and appropriately targeted level of assistance to larger families (with correspondingly higher usage) and to Aqua's lowest income customers. I am also concerned that Aqua is not proposing to adequately coordinate its program components to deliver holistic assistance to its low income customers. Thus, to address these concerns, I propose a number of recommendations that I believe are essential to an effective, efficient, and successful CAP.

To effectively improve access and affordability of utility services, CAPs must be designed to achieve a consistent and targeted level of affordability – and should be carefully coordinated with arrearage management and emergency fund components to holistically address affordability needs.

It has been over a quarter century since Aqua established its Helping Hand Program in 1994, to assist with arrearage management for low income households. At that time, Aqua's focus on arrearage assistance alone – as opposed to rate assistance and arrearage assistance – was considered acceptable. Until recently, water and wastewater services did not face the same levels of unaffordability that led the Commission to require the creation of comprehensive universal service programming for electric and natural gas companies in the 1990s. But today, the immense water and wastewater infrastructure challenges across the state and the nation are causing water and wastewater rates to skyrocket.[70] In short, low income households cannot afford to pay the

[70] See Joseph Kane, The Brookings Inst., Water Affordability Is Not Just a Local Challenge, But a Federal One Too (Jan. 25, 2018), available at: https://www.brookings.edu/blog/the-avenue/2018/01/25/water-affordability-is-not-just-

1 rapidly increasing cost of water and wastewater service, creating an affordability crisis for those
2 without the financial means to shoulder exponentially increased costs. Assistance programs have
3 evolved to include a coordinated plan to provide arrearage forgiveness, hardship fund grants, and
4 bill discounts, in order to create an essential and efficient mechanism to reduce termination rates
5 and uncollectible expenses. It has been my observation that the programs which include these three
6 components have been more successful in achieving these goals and assisting customers to better
7 afford and maintain service.

8 To be clear, I do not discount the role of Helping Hand in addressing customer debt. The
9 ability to retire arrears with assistance from Helping Hand provides an incentive for timely
10 payments for those households able to afford the current bill as well as the arrearage payment.
11 But the core fact remains that households applying for Helping Hand fell behind because they
12 could not afford to pay their current monthly bill. Aqua indicates that, on average, its identified
13 low income customers were billed for current services in the first 9 months of 2021 in the amount
14 of $80.49 a month – or $965.88 a year.[71] For a family of four at 50% FPL who subsist on $13,250
15 a year, this "on average cost" represents more than a 7% water/wastewater burden. Indeed, Aqua
16 indicates that significant numbers of Helping Hand customers have been removed in recent years
17 from Helping Hand due to nonpayment – 225 in 2018; 197 in 2019; 275 in 2020; and 506 in 2021.[72]

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a-local-challenge-but-a-federal-one-too/; Elizabeth A. Mack, A Burgeoning Crisis? A Nationwide Assessment of the Geography of Water Affordability in the United States, PLOS (Jan. 11, 2017), available at: https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0169488; Food and Water Watch, America's Secret Water Crisis: National Shutoff Survey Reveals Water Affordability Affecting Millions (Oct. 22, 2018), available at: https://www.foodandwaterwatch.org/insight/americas-secret-water-crisis

[71] OCA II-21, Attach.; OCA II-22, Attach.
[72] CAUSE-PA III-12.

These figures represent a significant percentage of Aqua's total Helping Hand enrollees,[73] and further emphasize the need for program modification and additional assistance, including direct rate assistance, to enable program success and ensure low income customers can more reasonably afford to maintain service to their homes.

As discussed in further detail below, under its current framing, Helping Hand's structure – whereby $25 of the customer's arrears are forgiven for each timely payment made while enrolled in Helping Hand – is insufficient to address stark issues of rate affordability at both current and proposed rates (discussed at length above), and does not provide adequate assistance to remediate arrears for customers with higher than average balances. Without a bill discount aspect to the program, customers who cannot afford their monthly bill will continue to accrue large arrearages and will not be able to avail themselves of the potential benefits of the Helping Hand Program. The cycle simply continues and results in higher uncollectible expenses, service terminations and a host of social ills described earlier in my testimony. As I have discussed throughout, Aqua's low income households face steep challenges to affording and maintaining their services on a monthly basis. Implementing a CAP, which will work in coordination with Helping Hand's arrearage management, would help to ensure that Aqua's lowest income customers are able to reduce their water/wastewater burdens, afford their monthly bills, and stay connected to critical and life-sustaining services.

ii. Proposed CAP Structure

Q: How did Aqua develop the proposed structure for its CAP?

[73] CAUSE-PA III-15.

A: Aqua's expert witness, Ms. Rita Black, described how Aqua performed a needs assessment in its service territory to determine the level of need for low income programming, which utilized census data to analyze rate affordability for households with incomes at or below 200% FPL – the current eligibility maximum for Helping Hand.[74] Ms. Black acknowledged that the United States Environmental Protection Agency (EPA), provided guidelines more that twenty years ago, which recommend that the average combined water and wastewater bill should be less than 4% to 4.5% of the median household income (maximum 2.5% for water, and 2% for wastewater).[75] However, she explained that those guidelines failed to consider affordability for consumers below median income.[76] Aqua further looked to affordability research conducted by Mr. Roger Colton, a nationally recognized utility affordability expert and economist who serves as OCA's witness in this case, which concluded a household's *combined* household water and wastewater burden should be no greater than the following percentage of income to be considered "affordable": 4.5% for households between 150-200% FPL, 4% for households between 100-149% FPL, 3.5% for households between 50-99% FPL, and 3% for households between 0-49% FPL%.[77]

Q: Do you have any concerns about Aqua's needs assessment?

A: Yes. First, it is unclear from Aqua's testimony whether it assessed the proposed discount levels to determine whether the program would achieve the target affordability standards set forth by the EPA and Mr. Colton. To be effective, assistance programs must be designed to meet assessed needs.

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[74] Aqua St. 10 at 6: 5-11. Aqua PA Exhibit RFB-1.
[75] Id. at 6: 12-16.
[76] Id. at 6.
[77] See id. at 6-7; see also Roger Colton, The Affordability of Water and Wastewater Service In Twelve U.S. Cities at 8.

1 I also note that EPA's system-wide affordability assessment tool is not an appropriate tool
2 to analyze bill affordability for low income households. EPA's affordability assessment tool was
3 designed to assess whether water and wastewater systems can reasonably adhere to infrastructure
4 investments necessary to fully comply with the statutory and regulatory strictures of the Clean
5 Water Act.[78] In doing so, EPA's standards look at system-wide affordability for average usage
6 customers with median household income for the geographic region. EPA's assessment tool was
7 not designed to assess the affordability of rates for low income customers in each geographic
8 region. As discussed above, low income families have significantly lower incomes than the
9 median household, so an assessment of affordability for a median income household does not shed
10 light on whether rates are reasonably affordable for the lowest income households in a given
11 geographic region.

12 That said, it does not appear as though Aqua fully applied EPA's assessment tool. Rather,
13 it appears as though Aqua recognized this flaw and used the affordability standards from the EPA
14 assessment – 2.5% of household income for water and 2% for wastewater – to assess affordability
15 at various federal poverty income levels, rather than applying to median household income. As
16 stated above, these guidelines are more than twenty years old and fail to consider affordability for
17 anyone below median income.[79] Aqua acknowledges that there is a more recent, more relevant
18 study by Roger Colton which focused on the affordability of water and wastewater burdens for
19 low income households and should have used the guidelines set out in that study.[80]

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[78] See US Conf. of Mayors, Am. Water Works Assoc. & Water Environment Fed., Affordability Assessment Tool for Federal Water Mandates (2013), available at: https://www.awwa.org/Portals/0/AWWA/ETS/Resources/AffordabilityAssessmentTool.pdf.
[79] Aqua St. 10 at 6-7.
[80] Id.

Ultimately, I believe that Mr. Colton's recommended affordability levels are most appropriate for assessing the relative affordability of rates for low income households, and recommend that the Commission apply a combined 4.5% for households between 150-200% FPL, 4% for households between 100-149% FPL, 3.5% for households between 50-99% FPL, and 3% for households between 0-49% FPL%.[81]

Q: Above, you explained that Aqua is proposing a tiered discount program design for its CAP. Do you support Aqua's proposed CAP structure?

A: Yes and no. As discussed below, I recommend that Aqua's proposed CAP structure should be implemented on a pilot basis to address immediate unaffordability for Aqua's low income customers. However, I also recommend that Aqua be required to further assess bill affordability under its proposed CAP design and take affirmative steps to adjust its CAP design in the event that CAP participants are exceeding projected affordability levels to ensure that assistance through the Program is equitably distributed and appropriately targeted such that low income families at all income levels can reasonably afford to maintain service to their homes.

CAUSE-PA Exhibit 1, attached to my testimony, provides a snapshot of the applicable water and wastewater burdens for those who enroll in Aqua's CAP in Water Rate Zone 1 – Main and Wastewater Rate Zone 1 – Media. As exemplified by these two rate zones, Aqua's proposed CAP structure will lower the water/wastewater burdens for many of Aqua's low income customers who participate in CAP. Thus, I am generally supportive of Aqua implementing its proposed CAP

[81] See Aqua St. 10 at 6-7; see also Roger Colton, The Affordability of Water and Wastewater Service In Twelve U.S. Cities at 8 .

design on an interim basis until an assessment of bill affordability for CAP participants can be made.

That said, I am concerned that Aqua's proposed bill discount structure will not reach consistent levels of affordability. There is a large body of research which shows that utility assistance programs are most successful at achieving programmatic goals (improved affordability and bill payment and reducing uncollectible expenses) when they are designed to deliver consistent and targeted levels of affordability across income and usage levels in tandem with meaningful arrearage management.[82]

As proposed, and as illustrated in CAUSE-PA Exhibit 1, low income customers with higher usage levels and lower income levels will have combined water and wastewater burdens which exceed accepted levels of affordability. For example, even with assistance through Aqua's proposed CAP, a 2-person household with income at 50% FPL in Aqua's Main Division will have an 8% combined water/wastewater burden at average usage rates; and a 3 or 4-person household with income at 50% FPL will face a 6% combined water/wastewater burden at average usage rates – far exceeding both the EPA and Mr. Colton's recommended combined water/wastewater burden standards for this income tier, discussed above. While burden levels achieved through Aqua's proposed CAP structure improve if income levels increase and usage decreases, I am nevertheless very concerned that the Program will not provide adequate assistance for households with the lowest income and/or high usage. Low income households often have higher usage as a result of

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[82] See e.g., Water Research Foundation, Best Practices in Customer Assistance Programs, at 78-80, (2010), *available at* http://www.waterrf.org/publicreportlibrary/4004.pdf; see also, American Water Works Association, Thinking Outside the Bill: A Utility Manager's Guide to Assisting Low income Water Customers, at 8 (2d ed. 2014), https://www.awwa.org/portals/0/files/resources/water%20utility%20management/thinkingoutsidethebill-2ed.pdf.

plumbing and fixture leaks as a result of living in older homes – yet most often lack the discretionary income to invest in repairs themselves and/or are unable to force their landlord to make such repairs.[83]

Q: Do you have any recommendations related to the structure of Aqua's proposed CAP?

A: Yes. As CAUSE-PA Exhibit 1 shows, Aqua's proposed CAP structure will provide critical bill assistance, but will not produce a consistent level of targeted affordability – especially for the lowest income households and for higher users who are more likely to have larger families and/or live in homes with leaky pipes and fixtures.

Thus, I recommend that Aqua's proposed CAP be implemented on an interim basis, based on Aqua's current proposed design. However, given that Aqua's proposed CAP structure may fail to provide participants with the lowest income and/or higher usage levels with affordable water/wastewater burdens that conform to recommended affordability standards, I recommend that Aqua be required to undertake an analysis of the water and wastewater burdens of its CAP customers at various usage levels (1,000; 2,000; 3;000; 4,000; and 5,000) and FPL tiers (0-50%; 51-100%; 101-150%; and 151-200% FPL) after its CAP has been implemented for a full year. This analysis should identify the mean and median usage levels of low income customers (including both CAP and non-CAP low income customers), the number of CAP customers that have been terminated and/or removed from CAP, and the number and percent of customers whose monthly bills exceed the 4% affordability standard for combined water and wastewater services,

[83] Coty Montag, Water/Color: A Study of Race and the Water Affordability Crisis in America's Cities, NAACP Legal Defense and Educational Fund, Inc, May 2019 ,at p. 28, (hereinafter "Water/Color Report") available at: https://www.naacpldf.org/wp-content/uploads/Water_Report_FULL_5_31_19_FINAL_OPT.pdf; see also CAUSE-PA III-1, Attach.; OCA II-8(b); OCA II-9(b).

discussed above. The results of this analysis should be presented to parties and stakeholders through Aqua's Helping Hand Collaborative within 18 months of the final Order in this proceeding. This would allow a full 6 months to conduct such an analysis. Aqua should be required to discuss possible amendments to its program to remediate identified affordability issues with its Helping Hand Collaborative.

In the event that 10% or more of Aqua's CAP participants in any income tier exceed a combined water and wastewater burden of 4% within the first year of program implementation, Aqua should be required to file a Petition within 24 months of the final Order in this case, or as part of its next base rate case (whichever is sooner), to amend its CAP structure to more accurately target affordability based on a participant's income level. Specifically, if Aqua's Program fails to reach consistent levels of affordability across income and usage tiers, I recommend that Aqua transition its CAP to a percentage of income payment (PIP) structure, which utilizes the burden levels recommended by Mr. Colton -- a combined 4.5% for households between 150-200% FPL, 4% for households between 100-149% FPL, 3.5% for households between 50-99% FPL, and 3% for households between 0-49% FPL%.[84] Implementing a CAP with a PIP structure would ensure that those at the lowest levels of the FPL and/or with larger families are not paying a disproportionate level of their incomes for critical water and wastewater services and would improve the ability of low income families to stay connected to water and wastewater services in their homes. Rates for water and wastewater services are likely to continue to rise in the coming

[84] See Aqua St. 10 at -6-7; see also Roger Colton, The Affordability of Water and Wastewater Service In Twelve U.S. Cities at 8 .

years, and it is important that Aqua have a program structure in place capable of delivering accessible, consistent, and equitable levels of affordability to economically vulnerable households.

Notably, Aqua anticipates transitioning to a new billing system in 2023 to align with the billing system used by Peoples Gas – which Aqua's parent company Essential Utilities acquired in 2019.[85] Peoples' CAP structure is already based on a PIP structure, and provides targeted assistance based on a precise percentage of a participants' household income.[86] Transitioning to a PIP structure following Aqua's transition to the Peoples billing system would help to bring about some of the benefits promised to consumers through that acquisition; namely, the ability to recognize economies of scale in terms of operations by aligning the design of Aqua and Peoples' CAPs.[87]

iii. ***CAP Enrollment***

Q: What is Aqua's proposed process for CAP enrollment?

A: Aqua indicates that if its CAP proposal is approved, it intends to launch an outreach program, including offering the program to current Helping Hand customers via an informational letter.[88]

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[85] See CAUSE-PA III-11; see also Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for All of the Authority and the Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC and Peoples Gas Company LLC by Way of the Purchase of All of LDC Funding, LLC's Membership Interests by Aqua America, Inc., Order, Docket Nos. A-2018-3006061; A-2018-3006062; and A-2018-3006063 (Order entered Jan. 24, 2020).

[86] Peoples Natural Gas Company Universal Service and Energy Conservation Plan, 2015-2018, at 6, available at: https://www.puc.pa.gov/pcdocs/1578118.pdf.

[87] See Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for All of the Authority and the Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC and Peoples Gas Company LLC by Way of the Purchase of All of LDC Funding, LLC's Membership Interests by Aqua America, Inc., Order, Docket Nos. A-2018-3006061; A-2018-3006062; and A-2018-3006063, at 6, 79, 133-35 (Order entered Jan. 24, 2020).

[88] CAUSE-PA III-3.

Q: Do you have any concerns about this process?

A: Yes. I am concerned that Helping Hand customers seeking to enroll in CAP will need to apply for CAP through the same methods available to other customers whose information is unknown,[89] rather than offering a streamlined process based on available, updated information already on file. For Helping Hand customers – many of whom might have relevant CAP application information already on file – requirements to produce potentially duplicative information and documentation is unnecessary, time consuming, administratively burdensome, and might act as a barrier to enrollment in CAP.

I am also concerned about the process for prospectively enrolling in CAP and the Helping Hand arrearage forgiveness program. In response to discovery asking whether new CAP customers will be automatically enrolled in the arrearage forgiveness component of Helping Hand, Aqua responded that the arrearage forgiveness component of the proposed CAP will be available to all customers who enroll in CAP with pre-program balances.[90] Based on this response it is unclear whether the arrearage forgiveness benefits of Helping Hand will be subsumed under Aqua's proposed CAP, so that CAP applicants (assuming they have pre-program arrears) will automatically have access to the arrearage forgiveness benefits under Helping Hand without separate application. I am concerned that requiring separate application processes, rather than a streamlined CAP that also includes arrearage forgiveness for pre-program arrears, would require potentially onerous and duplicative application processes that would stand as a barrier to successful Program enrollment and would add unnecessarily to administrative costs. As I discussed earlier, a

[89] CAUSE-PA III-4.
[90] CAUSE-PA III-6.

coordinated approach to the three essential elements of low income programs: arrears management, bill reduction, and an emergency fund are essential to an efficient, effective, and successful Program.

Q: Do you have any recommendations related to enrolling customers in the proposed CAP?

A: Yes. I recommend that Aqua be required to coordinate and streamline its proposed CAP with its Helping Hand arrearage forgiveness program, so that customers who enroll in CAP and who carry pre-program arrears will be able to access the benefits of arrearage forgiveness without separate application. As discussed, requiring separate applications that would potentially require duplicative customer documentation and information would stand as an unnecessary barrier to successful Program enrollment. Requiring both a bill discount and arrearage forgiveness component under the same umbrella Program would help to streamline customers' enrollment process and is consistent with other utilities in the Commonwealth who operate CAPs that have both bill discount and an arrearage forgiveness as integrated components under their CAPs.

For those customers already enrolled in Helping Hand at the time the proposed CAP would be implemented, I recommend that Aqua develop a streamlined application and enrollment process, so that customers who have updated information and/or documentation already on file will be able to apply – in short order – for the CAP without the need to resubmit information and/or documentation.

Finally, as discussed in further detail below, I recommend that Aqua develop a comprehensive consumer education and outreach plan in consultation with stakeholders through its Helping Hand Collaborative. Aqua indicates that they intend to promote their CAP, if approved,

through various methods, including website information, bill inserts, direct correspondence, and verbal referrals.[91] I recommend that Aqua integrate its plan for outreach and promotion of its proposed CAP into a comprehensive plan for outreach related to its low income programs that includes targeted outreach to low income communities, and outreach to customers with limited proficiency and to vulnerable communities who have traditionally suffered disproportionate effects of utility insecurity, such as Black and Latinx low income communities.

b. <u>Helping Hand Program (Arrearage Forgiveness)</u>

Q: How many households are enrolled in the arrearage forgiveness component of Aqua's Helping Hand Program?

A: Too few. Recall that Aqua estimates that nearly one in four – 106,823 out of 443,383 or 24.1% – households in its service territory have income less than 200% FPL.[92] Aqua provided the following information about its Helping Hand enrollment in response to discovery:

Table 10: Helping Hand Enrollment: May 2020-August 2021[93]

May* 2020	June 2020	July 2020	Aug 2020	Sep 2020	Oct 2020	Nov 2020	Dec 2020	Jan 2021	Feb 2021	Mar 2021	Apr 2021	May 2021	June 2021	July 2021	Aug 2021
305	557	762	883	945	1016	1082	1208	1234	1224	1244	1260	1200	1212	994	876

*Aqua indicates that data prior to May 2020 was not available

These numbers are very low compared the number of identified and estimated low income customers detailed above, and are grossly out of line with the number of low income customers

[91] CAUSE-PA III-5.
[92] <u>See</u> Aqua St. 10, Ex. RFB-1; OCA to Aqua II-3, Attach.
[93] CAUSE-PA I-21 (revised).

that have experienced payment difficulty. For example, Aqua indicates that the following number of identified low income customers were terminated for nonpayment: 2,339 in 2019; 255 in 2020; and 1,593 as of September 2021.[94] Additionally, Aqua reported that as of September 2021 alone, 4,336 identified low income customers were issued notices of disconnection.[95] Given the significant number of low income customers who have had trouble paying their Aqua bills, it stretches credulity for one to believe that only the low number of low income customers enrolled in Aqua's Helping Hand were in need of assistance in 2020 and 2021. Instead, what is far more likely to be the case is that the program simply is ineffective at targeting, enrolling, and serving the needs of low income households. The program requires significant revision.

Q: Does Aqua propose any changes to the Helping Hand Arrearage Forgiveness Program?

A: No. Aqua does not propose any changes in the present rate proceeding to the Helping Hand Program.[96]

Q: Do you have any concerns about the Helping Hand Program?

A: Yes. I am concerned that Helping Hand's arrearage forgiveness structure fails to adequately address the high levels of arrears faced by many low income customers. First, as discussed in the prior section, I am concerned that Helping Hand will not be appropriately coordinated with Aqua's CAP – or other complimentary forms of assistance – to facilitate seamless cross enrollment. If a household with arrears enters CAP, but does not receive assistance to retire accrued arrears, it will directly undermine the affordability achieved through CAP and the ability for the Program to

[94] OCA II-21, Attach.; OCA II-22, Attach.
[95] OCA II-9, Attach.
[96] CAUSE-PA III-15.

meaningfully improve bill payment and coverage rates. Above, with regard to CAP enrollment, I recommended improvements to program delivery to facilitate dual enrollment in CAP and Helping Hand.

I am also concerned that the level of enrollment in Helping Hand is far to low to meet the likely need for assistance. Aqua reports that as of August 2021, only 876 customers were enrolled in Helping Hand.[97] This is significantly lower than the number of low income customers who have been terminated for nonpayment, and the number of identified low income issued notices of disconnection by Aqua.[98] If Helping Hand were reaching those in need, enrollment would easily surpass termination rates – reaching beyond those at imminent risk of termination to help stabilize households with lower arrearage levels before they get to the point where they are about to lose critical service to their homes. Critical improvements are needed to increase customers' ability to learn about and enroll in Helping Hand, and prevent the accrual of additional debts.

Third, I am concerned that Helping Hand does not offer an effective incentive for many low income customers to reasonably catch up on accrued arrears. While providing customers with a mechanism for arrearage forgiveness is helpful, a $25 credit for each payment received is small compared to the average arrearage level carried by many low income customers. Low income customers carry substantial levels of arrears compared to residential customers as a whole. As Table 11 below shows, identified low income customers' average arrears reached $810.94 by September 2021, while the arrears carried by all residential customers for this period averaged $334.79. Average arrears of Helping Hand customers is even higher, reaching an average

[97] CAUSE-PA III-15, Attach.
[98] See supra.

$1,211.36 as of August 2021.[99] At $25 per month, it takes the average Helping Hand customer more than 4 years to retire this level of arrears, meaning those with higher arrears levels will face even longer arrears retirement periods, making the expectation of successfully resolving their debt unrealistic.

In addition to these higher arrearage levels, identified low income customers face higher current bill amounts – averaging $78.66 from 2019 to September 2021, compared to the average bill amount for this same period for all residential customers of $70.54:

Table 11: Average current bill amounts and arrearage amounts: Low Income v. Residential Customers (2019-September 2021)[100]

	2019	2020	2021*
Average bill for current service for all identified low income residential accounts	$75.23	$80.27	$80.49
Average bill for current service for all residential accounts (calculated in spreadsheet)	$65.78	$72.10	$73.75
Average arrears of identified low income residential accounts in arrears	$466.55	$574.49	$810.94
Average arrears of residential accounts in arrears (calculated in spreadsheet)	$195.15	$252.75	$334.79

*Data was provided through September 2021.

While it is not entirely clear what is driving these higher costs, I believe the primary contributor is likely the fact that lower income families tend to live in older housing stock and have a correspondingly higher likelihood for costly leaks that often go unrepaired – either due to lack of resources or a landlord's refusal to conduct the necessary repairs. I also note that Aqua's identified low income customers are those that Aqua has identified as low income because they are in need of assistance affording their bills – most likely also contributing to these higher costs.

[99] CAUSE-PA I-27.
[100] OCA II-21, Attach.; OCA II-22, Attach.

Finally, it appears that only a small number of Helping Hand customers have completed the Program successfully: 24 in 2021; 221 in 2020; 20 in 2019; and 3 in 2018.[101] This is a dismal success rate, and indicates that there are serious structural issues with the Program.

Overall, it appears that critical improvements are needed to the structure of Helping Hand so that low income consumers are given a reasonable means to catch up on past due bills. Otherwise, the collections benefits associated with universal service programs – in terms of reduced collections and uncollectible expenses and higher bill payment coverage rates – will not be realized. Other utilities that have customer assistance programs are successful at achieving program goals – including but not limited to, improving bill affordability and bill payment behaviors, and reducing uncollectible expenses – are not only designed to provide meaningful discounts to participants, but are also coupled with a mechanism for meaningful arrearage forgiveness.[102]

Q: Do you have any recommendations to improve the Helping Hand Arrearage Forgiveness Program?

A: Yes. First, as discussed, customers who enroll in Aqua's proposed CAP should automatically be enrolled in and receive the benefit of the arrearage forgiveness through Helping Hand if they enter CAP with existing arrears. To ensure that more at-need customers are able to access arrearage forgiveness, customers should not be required to apply for arrearage forgiveness

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[101] CAUSE-PA III-14.

[102] See e.g., Water Research Foundation, Best Practices in Customer Assistance Programs, at 78-80, (2010), available at: https://www.waterrf.org/research/projects/best-practices-customer-payment-assistance-programs; see also, American Water Works Association, Thinking Outside the Bill: A Utility Manager's Guide to Assisting Low income Water Customers, at 8 (2d ed. 2014), available at: https://www.awwa.org/Portals/0/AWWA/ETS/Resources/ThinkingOutsidetheBill-2Ed.pdf.

as a separate process, but rather should be provided the benefit as an integrated component of Aqua's CAP if they enter the program with existing arrears. This is consistent with the arrearage forgiveness provided by other major Pennsylvania utilities – in which arrearage forgiveness is provided concurrently with the bill discount under customer assistance programs.

Second, I recommend that Aqua revise the forgiveness structure under its Helping Hand Program to provide more targeted levels of forgiveness that allow a household to retire their debt in a reasonable period of time. In order to provide a meaningful and equitable means for low income customers to catch-up on their arrears – especially those customers who carry higher balances – I recommend that Aqua implement an alternative percent of forgiveness, rather than a flat forgiveness amount. Specifically, when entering the program, pre-program arrears should be frozen, and should no longer accrue any fees or charges. Then, for each in-full payment that a consumer makes on their discounted Helping Hand bill, 1/36th of the customer's frozen arrears or $25, whichever is greater, should be forgiven. This will allow households with larger balances to see far more tangible progress towards reducing outstanding arrears and will more effectively encourage consumers to make regular monthly payments on their new charges.

Providing an alternative percent reduction in forgiveness for each in-full payment will more equitably address arrears accrued by low income customers. Recall that the *average* arrearage for identified low income customers terminated for non-payment as of September 2021 was $810.38. [103] For those low income customers who exceed this average, a flat $25 monthly discount is unlikely to provide a meaningful monthly reduction in arrearage amounts. Providing

[103] OCA II-21, Attach.; OCA II-22, Attach.

percent reduction intended to remove arrears in three years for program participants who make in-full payments is also in line with the sanctioned Commission approach adopted by other utilities, and has proven to be successful at achieving program goals of reducing bill amounts, terminations, and uncollectible expenses.

Finally, the strong incentive to make full payments based upon a percentage of arrears forgiveness is only successful if program participants are aware of it and understand the process. As discussed below, I recommend that Aqua develop a comprehensive consumer education and outreach plan that is aimed at increasing enrollment in Helping Hand, as well as Aqua's other low income programs. Such a plan should be developed in conjunction with interested parties and stakeholders through Aqua's Helping Hand Collaborative to best target areas of need in Aqua's service territory. Aqua should be required to review its bill structure for residential CAP and Helping Hand customers to ensure that the bill clearly indicates the amount of monthly forgiveness earned each time the household makes a full payment – and the effect that reduction will have on the underlying amount due.

c. <u>Hardship Fund</u>

Q: Does Aqua maintain a Hardship Fund?

A: Yes. Certain income qualified customers can receive a grant from Helping Hand to reduce their unpaid balances.[104] Hardship grant amounts are determined based on the customer's average bill, with maximum grant amounts being $75 for average bills above $76.[105] For high usage or

[104] Aqua St. 10 at 5: 1-4.
[105] CAUSE-PA I-14, Attach.

large metered accounts, grants are calculated at 10% of the balance or the high bill the customer is having difficulty paying.[106]

Q: How many customers have received a grant through Aqua's Hardship Fund component of Helping Hand?

A: Aqua's Hardship Fund Program began in 2020. Only 68 customers received a grant in 2020,[107] and only 131 customers received a grant in 2021.[108] With Aqua reporting a total of $14,991 grant amounts distributed in 2021,[109] the average grant amount per customer is approximately $75.

Q: How does Aqua promote its Hardship Fund Program?

A: It is unclear the extent to which Aqua promotes its Hardship Fund Program. In response to discovery, Aqua refers to general promotional materials for its Helping Hand Program.[110] However, Aqua's promotional materials appear to not specifically advertise, or even mention, that grant assistance is available through Helping Hand.[111] Aqua also indicates that it does not target any specific subsets of customers[112] – such as those who might have the highest arrears, are subject to termination, or are known or likely to be eligible for grant funding.

Q: Does Aqua propose to make any changes to its Hardship Fund pursuant to the present rate filing?

A: No. Aqua does not propose any changes to its Hardship Fund in the present proceeding.

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[106] Id.
[107] CAUSE-PA I-22, Attach.
[108] Id.
[109] OCA II-37, Attach.
[110] CAUSE-PA I-17; OCA V-19; OCA V-19, Attach.
[111] OCA V-19, Attach.
[112] OCA V-19.

Q: Do you have any concerns related to Aqua's Hardship Fund?

A: Yes. First, I am concerned about the low numbers of customers who have been awarded a grant through the Program. This is not due to lack of available funds, as Aqua consistently underspends available hardship funding.[113] For example, Aqua reported that it only distributed $186 in emergency grant assistance in January 2021, while $50,461 in grant funding was available that month.[114]

While the amount of grants *awarded* by Aqua remains low, the need for emergency grant assistance amongst Aqua's low income customers is substantial. As discussed, Aqua estimates that nearly one in four – 106,823 out of 443,383 or 24.1% – households in its service territory have income less than 200% FPL.[115] As previously discussed, Aqua's low income customers carry substantial arrears compared to residential customers as a whole, and are terminated at substantially higher rates compared to residential customers as a whole – especially through the COVID-19 pandemic. These are significant figures that underscore the critical need for emergency grant assistance amongst a large portion of Aqua's low income customers. With the resumption of terminations for non-payment after the moratoriums put in place in response to the COVID-19 pandemic, the need for grant assistance is likely to increase.

As previously described, Aqua has also failed to account for or analyze COVID-19's impact on bill affordability for residential or low income customers.[116] While the full effects of COVID-19 are not currently known, an unprecedented number of low and moderate income

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[113] CAUSE-PA IV-11.
[114] Id.
[115] See Aqua St. 10, Ex. RFB-1; OCA to Aqua II-3, Attach.
[116] CAUSE-PA III-22.

1 households across the Commonwealth have lost substantial income as a result of the pandemic.[117]
2 Based on the economic toll already felt across the Commonwealth as a result of the pandemic –
3 coupled with the prospective higher bill amounts should Aqua's proposed rates be approved, I
4 believe that there is and will be a significant increase in need for emergency grant assistance
5 through the Hardship Fund.[118] As such, Aqua should be required to take additional steps to
6 eliminate barriers to the Hardship Fund and to bolster funding for the Program over the long-term.
7 Second, I am concerned that Aqua appears to not promote its Hardship Fund in outreach
8 materials. While Aqua provided a range or promotional materials for Helping Hand in response to
9 discovery, these promotional materials do not mention that Aqua maintains a Hardship Fund, let
10 alone how a customer might apply for emergency grant assistance.[119] While Aqua's stated policies
11 and procedures for its Hardship Fund appear to indicate that Aqua's team may refer customer
12 facing financial difficult due to COVID-19 for hardship funding, it is unclear when and if
13 customers are being informed of the option to apply for grant assistance – or if they are being
14 placed on payment arrangements ahead of being given the chance to apply for a hardship grant.
15 Indeed, Aqua's policies and procedures indicate that hardship grants "should not be in place of a
16 customer payment."[120] The lack of clarity for who, how, and when a customer is informed of or
17 referred to the Hardship Fund raises significant concerns about whether the funds are being
18 equitably distributed to all those in need.

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[117] See, e.g., Jin, Beatrice and McGill, Andrew, Who is Most at Risk of the Coronavirus Crisis: 24 Million of the Lowest-Income Workers, Politico (March 21, 2020), available at: https://www.politico.com/interactives/2020/coronavirus-impact-on-low income-jobs-by-occupation-chart/.
[118] See, e.g., Jin, Beatrice and McGill, Andrew, Who is Most at Risk of the Coronavirus Crisis: 24 Million of the Lowest-Income Workers, Politico (March 21, 2020), https://www.politico.com/interactives/2020/coronavirus-impact-on-low income-jobs-by-occupation-chart/.
[119] OCA V-19; OCA V-19, attachment.
[120] CAUSE-PA I-14, attachment.

Third, I am concerned that Aqua's calculation of grant amounts is out of line with the need of its low income customer based on its own data showing the level of low income bills, arrears, and amounts due at termination. As discussed, Aqua bases its hardship grants on the average bill on customer accounts, with the maximum grant award set at $75.[121] While it appears that Aqua's average hardship grant awarded in 2020 was actually *above* this maximum amount, there is no indication from Aqua's policies and procedures what circumstances would allow for a higher grant amount to be issued. Aqua's hardship grant policies should be both realistic and transparent. Capping hardship grants at $75 is far lower than the arrearages carried by Aqua's low income customers. In response to discovery, Aqua indicates that its residential customers, and specifically its identified low income customers, carry significant arrears at the time of termination due to nonpayment:

Table 12: Average Arrears – Identified Low Income Accounts v. Residential Accounts Terminated for Nonpayment: 2019-September 2021

	2019	2020	2021*
Average arrears of all identified low income residential accounts disconnected for nonpayment in that month	$607.88	$580.08	$810.38
Average arrears of all residential accounts disconnected for nonpayment in that month	$407.73	$430.54	$625.17

*Data available through September 2021.

While an emergency grant through the Hardship Fund Program may provide a critical means for low income customers to remain connected to service, the actual level of grant funding must be sufficient enough to reasonably provide relief to the arrears carried by eligible customers.

[121] CAUSE-PA I-14, attachment.

Similarly, as the Table below shows, there is a substantial gap between the average emergency grant amounts awarded, compared to the average arrearage of grant recipients:

Table 13: Hardship Grants Provided and Arrearage Levels

Month/Year	Number of Grants Awarded[122]	Average Grant Award[123]	Average Arrearage of Grant Recipient[124]
Jan. 2021	--	$62.00	$404.46
Feb. 2021	2	$375	$15.50
Mar. 2021	0	-	--
Apr. 2021	1	$75.00	$1,336.60
May 2021	90	$133.57	$198.42
Jun. 2021	8	$251.32	$280.63
Jul. 2021	29	$372.16	$2,867.36

As shown in the Table above, on average, the Hardship Fund grant that many low income customers receive is insufficient to meaningfully impact the substantial arrearage levels carried by grant recipients. With the lifting of the COVID-19 moratorium on utility terminations and the resumption of terminations for non-payment of residential customers, it is even more important that, in order to reduce the level of service termination, Aqua develop and maintain a robust hardship fund that can provide grants adequate to offset the unaffordability and arrearage level borne by Aqua's low income customers.

Q: Do you have any recommendations related to Aqua's Hardship Fund?

A: Yes. In light of the serious underutilization of Aqua's Hardship Fund, I recommend that Aqua be required to take several immediate steps to improve the accessibility and funding of its

[122] CAUSE I-22.
[123] CAUSE-PA IV-9.
[124] CAUSE-PA IV-9.

1 Hardship Fund. First, I recommend that Aqua be required to revise its maximum grant amount and
2 eligibility criteria for its hardship fund. As discussed, it appears that the maximum grant amount
3 for Aqua's hardship grant is set at $75. This is significantly out of line with the arrearages carried
4 by Aqua's low income customers and hardship grant recipients – and fails to provide a meaningful
5 grant discount to allow customers to catch-up on arrears and maintain services. As such, I
6 recommend that Aqua set its maximum grant amount at $500. This grant amount would more
7 closely match the average arrears carried by Aqua's low income customers. Moreover, increasing
8 this maximum grant limit will help Aqua to fully utilize funds in its Hardship Fund, which to date
9 remains significantly underspent.[125] In awarding Hardship Funds, Aqua should in turn be required
10 to consider not only customers' bill amounts, but also their arrearage levels and their potential for
11 service termination. This would allow Aqua to more closely target emergency grant assistance to
12 those with the most critical need and the level of unaffordability faced by low income customers
13 as a result of increasing arrears.

14 Second, I recommend that Aqua designate specific funding in this rate proceeding for its
15 Hardship Fund. The Joint Settlement in Aqua's recent merger proceeding with People's required
16 Aqua America's shareholders to contribute $50,000 for the Hardship Fund for four years.[126]
17 However, it appears that Aqua is not specifically required to roll over any unused funds from
18 previous program years and, as such, has allowed unspent dollars to lapse – resetting the budget

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[125] CAUSE-PA IV-11.

[126] Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for All of the Authority and the Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC and Peoples Gas Company LLC by Way of the Purchase of All of LDC Funding, LLC's Membership Interests by Aqua America, Inc., Joint Petition, Docket Nos. A-2018-300606L; A-2018-3006062; and A-2018-3006063, at para. 109 (Joint Petition filed June 26, 2019).

each year back to the same $50,000. In light of Aqua's clear failure to promote the program, its lack of transparency, and its unreasonable and unrealistic restrictions on grant amounts, Aqua has failed to comply with the spirit of its commitment under the Joint Settlement – saving its shareholders tens of thousands of dollars each year, while undercutting the availability of assistance to help those most in need avoid the loss of service to their home. As such, I recommend that Aqua be required to maintain its annual shareholder funding levels of $50,000 through, at minimum, its next base rate case, and to rollover any unused hardship funds into hardship funding for the next program year. As discussed, there is a profound need for hardship assistance amongst Aqua's low income customers. Low income customers struggle on a daily basis to make ends meet, and often make untenable choices between paying for utility services and other critical necessities – including food, medicine, and housing. These low income customers must be provided with a reasonable opportunity to obtain hardship funding.

I also recommend that Aqua be required to develop a plan to increase and stabilize future funding to its hardship fund on an ongoing basis. I recommend that Aqua work with the parties and stakeholders through its Helping Hand Collaborative to develop a plan that includes soliciting voluntary contributions to the Hardship Fund through fundraising initiatives and other stable funding streams and coordination with other utilities, including Peoples Natural Gas, to develop cross-outreach opportunities for soliciting these additional funds. Aqua should also be required to determine if other initiatives for increasing Hardship Funds in the long term – including an option for customers who make online payments to "add a buck" to their bills or "round up" their bill in order to contribute to the Hardship Fund.

Finally, I recommend revising Aqua's internal policies and procedures for informing customers about the availability of emergency grant assistance through the Hardship Fund program. As discussed, it is unclear how, when, and under what circumstances a customer is informed of the availability of grant assistance through the Hardship Fund program. Aqua should be required to immediately revise its policies and procedures, and develop appropriate training materials and scripting, to reflect that low income customers who are having trouble paying their bills, or who have accrued past due arrears, should first be screened for CAP and Helping Hand arrearage forgiveness. Aqua should also screen CAP and Helping Hand customers who are unable to afford their bills, or customers who are facing an immediate risk of termination, for Hardship Fund eligibility, and assisted to apply for grant assistance, regardless of whether they have first applied for or enrolled in a payment arrangement.

d. <u>Consumer Outreach and Education</u>

Q: Please describe how Aqua promotes its low income programs?

A: In response to discovery, Aqua provided a number of print and promotional materials, including directed letters, Facebook advertisements, and blog posts.[127] Aqua also indicated that it uses a number of criteria to determine its outreach, including a low income analysis broken down by counties and the need for information on certain programs and initiatives, such as modified program requirements.[128] Aqua also detailed that, if its CAP proposal is approved, it supports the use of cross-enrollment features that involves obtaining verbal permission from customers through

[127] OCA V-19, Attach.
[128] OCA V-20, Attach.

Dollar Energy Fund (DEF) to enroll the customer in multiple utility assistance programs administered by DEF, and plans to make further inquiry if its CAP proposal is approved.[129]

Q: Do you have any concerns about Aqua's consumer outreach and education efforts?

A: Yes. I have several concerns about Aqua's outreach and education efforts related to its low income programs. As already noted in regard to CAP, Helping Hand, and the Hardship Fund program, the effectiveness and success of the particular component depends on the level of customer awareness of its existence, benefits, the rules of eligibility, and the process to participate. It is for this reason that a well developed and coordinated outreach and education process is essential.

First, I am concerned that Aqua has failed to take advantage of critical opportunities for outreach and education related to its low income[130] Without concerted and regular efforts to target vulnerable low income communities that have historically faced utility insecurity, it becomes all the more difficult to ensure that low income and at-need communities are learning about Aqua's low income programs.

I am also concerned that Aqua does not appear to have developed any outreach materials in languages other than English. As discussed below, it is critical that low income consumers with limited English proficiency can learn about and enroll in Aqua's assistance programs – and are not categorically excluded from outreach efforts related to these program.

I am similarly concerned that Aqua reports that there have been no Helping Hand events since 2018.[131] While it is understandable that recent in-person events have been halted as a result of the

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[129] CAUSE-PA III-7.
[130] See OCA V-19.
[131] CAUSE-PA I-18.

COVID-19 pandemic, not participating at any Helping Hand events since 2018 has severely limited Aqua's ability to directly target certain communities that would not otherwise be accessible. And, as previously discussed, Aqua's Helping Hand outreach materials do not advertise the availability or means to apply for its Hardship Fund.

Again, Aqua's enrollment is Helping Hand is very low compared to the number of low income customers in its service territory who have experienced termination as a result of nonpayment, or who have been issued notices of disconnection. Aqua's Hardship Fund has also only been successfully accessed by a total of 199 customers since its creation in 2020, with the majority of funds available remaining unspent.[132] The low enrollment and take rates of Aqua's low income assistance program highlight the need for enhanced, more concerted efforts to reach and enroll low income consumers in Aqua's service territories in assistance programs.

Q: Do you have any recommendations for how Aqua can expand and refine its outreach and education efforts related to its low income programming?

A: Yes. In order to increase the awareness of and enrollment in Aqua's low income programs, I recommend that Aqua set forth a comprehensive and coordinated consumer outreach and education plan. This plan should be developed with input from the parties and interested stakeholders through Aqua's Helping Hand Collaborative and should set forth how Aqua will specifically promote and coordinate each of its low income programs, including its Hardship Fund. This Plan should be tailored to the demographics of Aqua's service territory; should include how Aqua will perform targeted outreach to specific at-need consumers and communities – including consumers who have historically faced pervasive unaffordability and barriers to accessing and

[132] CAUSE-PA IV-11.

maintaining utility services, such as low income Black and Latinx communities; and should specifically identify efforts to educate and enroll eligible customers at or below 50% FPL. All promotional and education materials should be translated into, at minimum, Spanish; and should identify resources and translation services for LEP customers. Aqua should conduct a language needs assessment to identify other commonly spoken languages across its broad service territory.

I also recommend that Aqua explore further opportunities for cross program enrollment and outreach with Peoples and other major utilities in the counties that Aqua serves. Aqua's service territory covers many other utilities – including a majority of counties in the northeastern and southeastern region of the state where DEF does not operate. Thus, while a good step, Aqua's promise to pursue cross-enrollment with programs administered by DEF – and not with other utility assistance programs – falls short.

In conjunction with the development of a consumer education and outreach plan, I recommend that Aqua be required to set certain target enrollment numbers for its low income programs. First, Aqua should be required to establish a target enrollment level for each of its programs (CAP, Helping Hand, and Hardship Fund). For CAP and Helping Hand, enrollment targets should be set at 20% per year of its estimated number of customers at or below 150% FPL until Aqua has reached at least 75% enrollment of this target group. For the Hardship Fund, Aqua should strive to fully expend its available budget each year to provide emergency grant assistance to those in need. Second, Aqua should be required to establish quantitative goals related to affirmative customer contacts with the purpose of enrolling low income customers in assistance programs. These affirmative contacts should include not only telephone contacts and mailing, but also electronic communication, virtual events, "train the trainer" sessions with local community,

social, and legal services groups, and an eventual plan for in-person events once it is safe to do so. Aqua should be required to track and report its progress, including the number of successful enrollments as a result of its efforts, to its Helping Hand Collaborative, and should continue to refine it outreach efforts based on community and Helping Hand Collaborative feedback.

e. <u>Low Income Service Line Repair and Replacement, and Water Conservation</u>

Q: Did the terms of the Joint Petition for Settlement in the Aqua-People's merger proceeding (Filed June 26, 2019 at Docket Nos. A-2018-300606L A-2018-3006062 and A-2018-3006063) contain any requirement related to a service repair line and replacement program?

A: Yes. Paragraph 108 of the parties Joint Settlement in the Aqua-People's merger proceeding required Aqua to evaluate and discuss the development of a comprehensive universal service and conservation program that that included (1) a bill payment/ customer assistance program; (2) a hardship fund; (3) a water conservation program; (4) a low income service repair line and replacement program; and (5) a comparable funding mechanism that exists for electric and gas utilities.[133]

[133] Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for All of the Authority and the Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC and Peoples Gas Company LLC by Way of the Purchase of All of LDC Funding, LLC's Membership Interests by Aqua America, Inc., Joint Petition, Docket Nos. A-2018-300606L; A-2018-3006062; and A-2018-3006063, at para. 108 (Joint Petition filed June 26, 2019).

Q: Does Aqua propose any low income service line repair and replacement programming or conservation measures in this proceeding?

A: Yes. Aqua is proposing an Emergency Repair Program.[134] Through this Program, low income homeowners would be able to contact Aqua about their bills and identify an ongoing leak and can obtain assistance with the cost of repairs.[135] Aqua proposes a $100,000 annual budget for assistance that will includes the Emergency Repair Program and conservation kits.[136] Aqua also currently offers conservation kits to Helping Hand customers which include leak detection tablets, a low flow showerhead, and low flow aerators for kitchen faucets.[137]

Q: Do you have any concerns related to Aqua's proposed conservation measures offered to low income customers?

A: Yes. I am concerned that Aqua is only proposing limited funding of $100,000 a year for line repair/replacement and conservation measures. Aqua's low income customers, and customers who are enrolled in Helping Hand, carry on average higher usage levels, compared to residential customers as a whole:

Table 14: Average Usage: Residential, Low Income, and Helping Hand Customers: September 2021[138]

	Residential Customers	Residential Low Income Accounts	Helping Hand customers
Water	42.6	52.4	68.0
Wastewater	61.5	67.7	--
Combined	36.5	52.5	55.4

[134] Aqua St. 10 at 8: 9-21.
[135] Id.
[136] Id.
[137] CAUSE-PA I-23; CAUSE-PA I-24.
[138] CAUSE-PA III-1.

As discussed above, available data indicates that current bill amounts and corresponding usage amounts for identified low income customers are also larger than residential customers as a whole – indicating a need for effective conservation measures for low income customers. Recall that Aqua estimates that 106,823 out of 443,383 or 24.1% households in its service territory have income less than 200% FPL.[139] With the large number of low income customers who will benefit from conservation measures, Aqua's proposal to allocate just $100,000 a year is woefully inadequate to help address clear disparities in usage and correspondingly higher arrears, likely driven by aging and leaky lines and fixtures..

Similarly, with the potential high cost of replacing a damaged customer side service line,[140] I question whether Aqua's proposed funding can adequately serve low income customers who are in need to repair/replace their service lines. This is particularly concerning as Aqua has a policy to terminate service to customers who do not make repairs to leaking customer-side service lines, or make arrangements with the Company for these repairs.[141]

I am also concerned that Aqua has not set forth a plan for how it will allocate the small amount of proposed annual funding for line repair/replacement and conservation, and does not propose any comprehensive or direct-install measures. A *comprehensive* conservation and line repair program which offers deeper savings, direct-installed conservation measures would help Aqua's low income customers to control their usage levels and monthly bills, and help Aqua to effectively manage the costs associated with its low income programming by helping to reduce

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[139] See Aqua St. 10, Ex. RFB-1; OCA to Aqua II-3, Attach.
[140] CAUSE-PA IV-4.
[141] CAUSE-PA IV-5.

high usage associated with leaky pipes and fixtures which low income households often cannot afford to repair on their own.[142]

Q: Do you have any recommendations related to Aqua's service line repair/replacement and conservation programs?

A: Yes. I recommend that Aqua be required to work with its Helping Hand Collaborative to further develop a comprehensive conservation and line repair program and program plan no later than 6 months of the final order in this proceeding. The conservation measures offered by this program should not be limited to line repair/replacement and basic 'do it yourself' kits, but should also include installation of deeper savings measures. Services should be coordinated with energy reduction programs provided through the local electric and gas utilities to ensure coordinated program delivery. The proposed program should also include proposed annual reporting parameters of water savings achieved and any associated reduction in Aqua's low income assistance program costs as a result of these programs.

This line repair and conservation program should be available to all low income customers, but should target high usage, low income customers enrolled in CAP and Helping Hand. Low income customers most often lack the discretionary income to participate in a rebate program, so direct-install programs are more accessible for low income consumers. Low income households will also not have the up-front cash on hand to pay for a plumber, so installation services will need to be included in the program.

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[142] See e.g., U.S. EPA, Best Practices to Consider When Evaluating Water Conservation and Efficiency as an Alternative for Water Supply Expansion, EPA-810-B-16-005 (Dec. 2016) at 39-41, available at: https://www.epa.gov/sites/production/files/2016-12/documents/wc_best_practices_to_avoid_supply_expansion_2016_508.pdf.

In addition to working with its Helping Hand Collaborative to further develop its line repair and conservation plan, Aqua should coordinate its service delivery with other utilities in Aqua's service territory that operate energy efficiency and conservation programs, such as Low Income Usage Reduction Programs (LIURP) and Act 129 programs. Many utility conservation programs already provide a number of measures that increase water efficiency in customer's households, such as low flow faucets, toilets, and shower heads.[143] Partnering with other energy efficiency programs will not only allow Aqua to leverage other utility conservation programs, it will also ensure that customers can obtain comprehensive conservation measures to reduce their overall water and energy usage.

V. LANGUAGE ACCESS

Q: What are the Commission's regulatory language access requirements that apply to Aqua?

A: Utilities are required to include on termination notices a phone number and directions for LEP customers to call for information and translation assistance in Spanish and any other languages comprising 5% or more of the population in its service territory.[144] Utilities are also required to provide billing information in Spanish if they serve a substantial number of Spanish speaking customers.[145] Of course, the issue of language access should not be limited to what is legally required. If a utility is truly seeking to provide exemplary customer service, it should ensure that it is proactively meeting the language access needs of the population it serves.

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[143] See 52 Pa. Code § 58.14.
[144] Id. at § 56.91(17).
[145] Id. at § 56.201(b).

Q: How will Aqua's proposed rate increase impact immigrant populations in its service territory?

A: On average, limited English proficient individuals earn lower wages than their English proficient counterparts.[146] Thus, any rate increase would have the tendency to disproportionately impact immigrant communities in which there are large numbers of limited English proficient individuals.[147]

Q: Does Aqua have a formal language access plan?

A: As cited in response to CAUSE-PA-II-9, the company has customer service representative staff available to interpret for non-English speaking customers. When a customer chooses the Spanish language prompts through its interactive voice response (IVR) system, the call is routed to a Spanish speaking associate. This appears to be the extent of Aqua's language access plan. Further, Aqua does not provide any documentation to its customers in Spanish other than the statement required by 52 Pa. Code § 56.91(17) directing Spanish-speaking customers to a number to call for information and translation assistance, and does not provide translation services in any language other than Spanish.[148]

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[146] "In 2013, about 25% of LEP individuals lived in households with an annual income below the official federal poverty line – nearly twice as high as the share of English-proficient persons (14 percent)." Jie Zong & Jeanne Batalova, The Limited English Proficient Population in the United States, Migration Policy Institute Journal (July 8, 2015), available at: http://www.migrationpolicy.org/article/limited-english-proficient-population-united-states.

[147] Id. ("In 2013, about 50% of immigrants (20.4 million) were LEP, compared to 2 percent of the U.S.-born population.").

[148] CAUSE-PA-III-20.

Q: Is Aqua's Language Access Plan sufficient?

A: No. I believe that Aqua should base its language access needs on data from the geographic area it serves – including an independent assessment of the language needs in each county within Aqua's sprawling service territory. Basing language needs only on affirmative requests for interpretation services to its interactive voice response system likely obscures the real need for services given that the prompts are only in Spanish and English. If a non-Spanish speaking limited English proficient customer calls, it is not clear what Aqua does to provide translation services. Limited English proficient individuals may not be aware that they can ask for interpretation and may abandon the contact, attempt to muddle through the process without requesting interpretation, or may rely on family or friends to call for them. Reliance on family or friends for translation can be cause for important aspects of the terms of service to be missed or obscured, especially when children are required to step in to assist their LEP parent, and raises significant privacy and confidentiality concerns. While it would not be reasonable to assume that Aqua will have in-person translators for every language spoken in their broad service area, it is reasonable to require that they utilize a telephone interpreter line to facilitate these translations. Thus, I recommend that Aqua be required to provide telephonic translation service of all limited English Proficient customers within their service territory, regardless of what language the caller speaks.

Q: Has Aqua conducted any needs assessments of its LEP population?

A: Aqua has not performed a needs assessment regarding the need for translation or language access withing Aqua's service area.[149] Further, Aqua does not believe its Spanish speaking population to be substantial – despite its lack of any needs assessment.[150]

According to Aqua's website, it serves more than 1.4 million residents in 32 counties across the Commonwealth.[151] This would mean that statewide, approximately 11.2% of those 1.4 million residents, or 156,800 residents, speak languages other than English at home.[152] So, while Aqua does not believe its Spanish speaking population to be substantial,[153] I would argue that Aqua very likely serves a substantial Spanish-speaking population, as well as customers speaking any number of other non-English languages. According to the Migration Policy Institute, Pennsylvania's LEP population increased by 87.9% from 2000-2018.[154] Also, while the Commission's regulations rely on the number or percentage of residents to determine the need for language translation or interpretation service, this is not the sole indicator of need for a language access services for a given language. Specifically for Aqua, which covers such a broad geographic area, an assessment of need must be at the county level – not the total service territory.

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[149] CAUSE-PA-II-10.
[150] CAUSE-PA-II-14.
[151] Aqua Pennsylvnaia (accessed Nov. 10, 2021), available at: https://www.aquaamerica.com/our-states/pennsylvania.aspx.
[152] Jeanne Batalova & Elijah Alperin, Immigrants in the U.S. States with the Fastest-Growing Foreign-Born Populations (July 10, 2018), available at: https://www.migrationpolicy.org/article/immigrants-us-states-fastest-growing-foreign-born-populations-2016.
[153] CAUSE-PA-II-14.
[154] Migration Policy Institute, Data Hub, Pennsylvania State Immigration Data Profiles, available at: https://www.migrationpolicy.org/data/state-profiles/state/language/PA (Data for Alaska, Delaware, Hawaii, Idaho, Maine, Mississippi, Montana, North Dakota, South Dakota, Vermont, West Virginia, and Wyoming are from the U.S. Census Bureau's pooled 2014-2018 American Community Survey (ACS). Data for the United States overall and for the remaining states are from the 2018 ACS.).

The level of English proficiency among non-English speaking households often varies between languages. Table 15 shows the ten languages most commonly spoken at home in Pennsylvania and the corresponding level of LEP population.

Table 15: Languages Most Commonly Spoken at Home in Pennsylvania[155]

Language	Total Population	LEP Population	LEP %
Spanish	633,342	248,401	39.2%
Chinese (Mandarin & Cantonese)	***95,753***	***49,002***	***51.2%***
German	43,349	8,739	20.2%
Russian	***39,733***	***18,124***	***45.6%***
Arabic	39,249	12,557	32.0%
Vietnamese	***36,389***	***20,292***	***55.8%***
French (Including Cajun)	35,229	9,214	26.2%
Korean	27,974	12,610	45.1%
Gujarati	27,038	8,884	32.9%
Hindi	24,264	5,035	20.8%

As shown, Pennsylvania has a large number of Chinese language speakers, and there is a correspondingly high percentage of LEP need among that population. There are also a substantial number of Russian and Vietnamese speakers and a high percentage of LEP need among that population as well. I recommend that Aqua conduct a formal, county-specific needs assessment to determine whether it should expand its language access policies to include document translation in languages other than Spanish. Aqua should incorporate the findings into a formal language access policy, which at a minimum should be shared with the parties to this proceeding and the members of its Helping Hand Collaborative.

[155] Id.

Q: Are there other issues that should be evaluated in Aqua's language access needs assessment?

A: Yes. As discussed above, Aqua indicates that when a customer chooses the Spanish interpretation prompts through its IVR system, the customer is then routed to Aqua's Spanish speaking associates.[156] Although many LEP speakers have children or other relatives or friends that speak English, a child or other third-party should never be considered as an appropriate interpreter or asked to interpret for an adult. In addition to raising issues of confidentiality, reliance on children or other third parties to interpret may, quite literally, cause critical information about a customers' account to be lost in translation – and could place substantial mental strain and hardship on a minor attempting to help their parents avoid the loss of critical services to their home. Additionally, a conversation about a billing issue, particularly regarding missed payments or terminations, is private and can be embarrassing. An LEP customer should not have to reveal to their financial situation to other people in the home or family friends in order to effectively communicate with their water or wastewater company. The better practice is to have a professional third-party interpreter service immediately available for all LEP customers.

Thus, I recommend that Aqua evaluate its process for determining the need for third party interpretation as part of its needs assessment and incorporate clear guidelines for determining the need for third party interpreter service as part of its formal Language Access Plan. In the meantime, Aqua should immediately proceed to contract with a telephonic interpreter service. Accordingly, it should change its IVR to inform all customers of the availability of interpreter services in

[156] CAUSE-PA II-14.

multiple languages, allowing the customer to select their language and be transferred to an interpreter.

Q: Are there additional documents that Aqua should be providing in Spanish?

A: Yes. Aqua has indicated that their written materials have not been translated into any languages other than English.[157] Utilities that serve a "substantial number" of Spanish speaking customers are required to provide billing information in Spanish.[158] Considering the number of Aqua's residential customers[159] and the broad expanse of Aqua's service territory throughout the state of Pennsylvania, are strong indicators that Aqua serves a substantial number of Spanish speaking customers. As such, I recommend that, in order to comply with the requirements of 52 Pa. Code § 56.201(b), Aqua provide translated billing information, including but not limited to:

> (1) Billing and estimated billing procedures.
> (2) Methods for customer verification of billing accuracy.
> (3) Explanation of operation of purchased gas adjustment clauses.
> (4) Payment requirements and procedures.
> (5) Security deposit and guarantee requirements.
> (6) Procedures for discontinuance and reconnection of service.
> (7) Dispute, informal complaint, and formal complaint procedures.
> (8) Explanation of meter reading procedures which would enable a customer or occupant to read his own meter.
> (9) Procedure whereby customers or occupants may avoid discontinuance of service during extended periods of absence.
> (10) Third-party notification procedures.
> (11) Telephone numbers and addresses of the public utility and of the nearest regional office of the Commission where further inquiries may be made.
> (12) Definitions of terms or abbreviations used by the public utility on its bills.

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[157] CAUSE-PA II-11.
[158] 52 Pa. Code § 56.201(b).
[159] Aqua Pennsylvania (accessed Nov. 10, 2021), available at: https://www.aquaamerica.com/our-states/pennsylvania.aspx.

> (13) Information indicating that additional consumer protections may be available for victims of domestic violence who have a protection from abuse order or a court order issued by a court of competent jurisdiction in this Commonwealth which provides clear evidence of domestic violence, people with serious illnesses and low income households.[160]

Providing translated billing information will both ensure that Aqua is compliant with the Commission's language access regulations and ensure that Spanish-speaking LEP customers are able to understand what they owe, how to pay, steps they can take if they have trouble paying, and their rights and responsibilities if they are unable to pay.

Q: Are there deficiencies in Aqua's termination notices that affect LEP customers?

A: Yes. The Public Utility Commission sets forth basic translation requirements for termination notices in 52 Pa. Code § 56.91: "A notice of termination must include, in conspicuous print, clearly and fully the following information when applicable: …

> (17) Information in Spanish directing Spanish-speaking customers to the number to call for information and translation assistance. Similar information shall be included in other languages when census data indicates that 5% or more of the residents of the utility's service territory are using that language."

I have reviewed Aqua's termination notices that it sends to residential customers.[161]

While other termination notices utilized by Aqua do provide a Spanish language blurb, the blurb does not specifically indicate that the document is a termination notice.[162] This could be confusing for those who do not speak or speak very little English. I recommend that Aqua amend the language on all of its termination notices to indicate, in Spanish, that the document is a termination notice and inaction may result in the termination of their water service.

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[160] 52 Pa. Code § 56.201(b).
[161] OCA II-29.
[162] Id.

Q: Does that conclude your direct testimony?

A: Yes; however, I reserve the right to submit rebuttal and surrebuttal testimony in response to testimony submitted by other parties in this proceeding.

THE COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

EXHIBIT 1

WATER AND WASTEWATER CAP BURDENS

CAUSE-PA Exhibit 1(a)

Water Burden Chart

Residential -- Rate Zone 1- Main Division

- For Water Rates :See Aqua Base Rate Filing , Vol. 1, Ex. 5-A, Pt. II, Sched. 8
- For CAP rates: See Aqua St. 10, Ex. RFB-2
- For FPL: See U.S. Dept. of Health and Human Services, 2021 U.S. Federal Poverty Guideline

See HHS Poverty Guidelines for 2021, https://aspe.hhs.gov/poverty-guidelines.

	2 Person Household									
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED	Monthly CAP PROPOSED	Annual CAP PROPOSED	Burden - CAP PROPOSED
	2000 Gal.									
50% FPL	$ 8,710	$ 42.25	$ 507.00	6%	$ 49.38	$ 592.56	7%	$ -	$ -	0%
101% FPL	$ 17,421	$ 42.25	$ 507.00	3%	$ 49.38	$ 592.56	3%	$ 13.49	$ 161.88	1%
151% FPL	$ 26,131	$ 42.25	$ 507.00	2%	$ 49.38	$ 592.56	2%	$ 26.98	$ 323.76	1%
	3000 Gal									
50% FPL	$ 8,710	$ 55.80	$ 669.60	8%	$ 65.35	$ 784.20	9%	$ 15.97	$ 191.64	2%
101% FPL	$ 17,421	$ 55.80	$ 669.60	4%	$ 65.35	$ 784.20	5%	$ 29.46	$ 353.52	2%
151% FPL	$ 26,131	$ 55.80	$ 669.60	3%	$ 65.35	$ 784.20	3%	$ 42.95	$ 515.40	2%
	4000 Gal									
50% FPL	$ 8,710	$ 69.35	$ 832.20	10%	$ 81.32	$ 975.84	11%	$ 31.94	$ 383.28	4%
101% FPL	$ 17,421	$ 69.35	$ 832.20	5%	$ 81.32	$ 975.84	6%	$ 45.43	$ 545.16	3%
151% FPL	$ 26,131	$ 69.35	$ 832.20	3%	$ 81.32	$ 975.84	4%	$ 58.92	$ 707.04	3%
	5000 Gal									
50% FPL	$ 8,710	$ 82.91	$ 994.92	11%	$ 97.29	$ 1,167.48	13%	$ 47.91	$ 574.92	7%
101% FPL	$ 17,421	$ 82.91	$ 994.92	6%	$ 97.29	$ 1,167.48	7%	$ 61.40	$ 736.80	4%
151% FPL	$ 26,131	$ 82.91	$ 994.92	4%	$ 97.29	$ 1,167.48	4%	$ 74.89	$ 898.68	3%

	3 Person Household									
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED	Monthly CAP PROPOSED	Annual CAP PROPOSED	Burden - CAP PROPOSED
	2000 Gal.									
50% FPL	$ 10,980	$ 42.25	$ 507.00	5%	$ 49.38	$ 592.56	5%	$ -	$ -	0%
101% FPL	$ 21,961	$ 42.25	$ 507.00	2%	$ 49.38	$ 592.56	3%	$ 13.49	$ 161.88	1%
151% FPL	$ 32,941	$ 42.25	$ 507.00	2%	$ 49.38	$ 592.56	2%	$ 26.98	$ 323.76	1%
	3000 Gal									
50% FPL	$ 10,980	$ 55.80	$ 669.60	6%	$ 65.35	$ 784.20	7%	$ 15.97	$ 191.64	2%
101% FPL	$ 21,961	$ 55.80	$ 669.60	3%	$ 65.35	$ 784.20	4%	$ 29.46	$ 353.52	2%
151% FPL	$ 32,941	$ 55.80	$ 669.60	2%	$ 65.35	$ 784.20	2%	$ 42.95	$ 515.40	2%
	4000 Gal									
50% FPL	$ 10,980	$ 69.35	$ 832.20	8%	$ 81.32	$ 975.84	9%	$ 31.94	$ 383.28	3%
101% FPL	$ 21,961	$ 69.35	$ 832.20	4%	$ 81.32	$ 975.84	4%	$ 45.43	$ 545.16	2%
151% FPL	$ 32,941	$ 69.35	$ 832.20	3%	$ 81.32	$ 975.84	3%	$ 58.92	$ 707.04	2%
	5000 Gal									
50% FPL	$ 10,980	$ 82.91	$ 994.92	9%	$ 97.29	$ 1,167.48	11%	$ 47.91	$ 574.92	5%
101% FPL	$ 21,961	$ 82.91	$ 994.92	5%	$ 97.29	$ 1,167.48	5%	$ 61.40	$ 736.80	3%
151% FPL	$ 32,941	$ 82.91	$ 994.92	3%	$ 97.29	$ 1,167.48	4%	$ 74.89	$ 898.68	3%

	4 Person Household									
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED	Monthly CAP PROPOSED	Annual CAP PROPOSED	Burden - CAP PROPOSED
	2000 Gal.									
50% FPL	$ 13,250	$ 42.25	$ 507.00	4%	$ 49.38	$ 592.56	4%	$ -	$ -	0%
101% FPL	$ 26,501	$ 42.25	$ 507.00	2%	$ 49.38	$ 592.56	2%	$ 13.49	$ 161.88	1%
151% FPL	$ 39,751	$ 42.25	$ 507.00	1%	$ 49.38	$ 592.56	1%	$ 26.98	$ 323.76	1%
	3000 Gal									
50% FPL	$ 13,250	$ 55.80	$ 669.60	5%	$ 65.35	$ 784.20	6%	$ 15.97	$ 191.64	1%
101% FPL	$ 26,501	$ 55.80	$ 669.60	3%	$ 65.35	$ 784.20	3%	$ 29.46	$ 353.52	1%
151% FPL	$ 39,751	$ 55.80	$ 669.60	2%	$ 65.35	$ 784.20	2%	$ 42.95	$ 515.40	1%
	4000 Gal									
50% FPL	$ 13,250	$ 69.35	$ 832.20	6%	$ 81.32	$ 975.84	7%	$ 31.94	$ 383.28	3%
101% FPL	$ 26,501	$ 69.35	$ 832.20	3%	$ 81.32	$ 975.84	4%	$ 45.43	$ 545.16	2%
151% FPL	$ 39,751	$ 69.35	$ 832.20	2%	$ 81.32	$ 975.84	2%	$ 58.92	$ 707.04	2%
	5000 Gal									
50% FPL	$ 13,250	$ 82.91	$ 994.92	8%	$ 97.29	$ 1,167.48	9%	$ 47.91	$ 574.92	4%
101% FPL	$ 26,501	$ 82.91	$ 994.92	4%	$ 97.29	$ 1,167.48	4%	$ 61.40	$ 736.80	3%
151% FPL	$ 39,751	$ 82.91	$ 994.92	3%	$ 97.29	$ 1,167.48	3%	$ 74.89	$ 898.68	2%

CAUSE-PA Exhibit 1(b)

Wastewater Burden Chart

Residential -- Rate Zone 1 -- Media Division

- For Wastewater Rates :See Aqua Base Rate Filing , Vol. 1, Ex. 5-B, Sched.WW-7
- For CAP rates: See Aqua St. 10, Ex. RFB-2
- For FPL: See U.S. Dept. of Health and Human Services, 2021 U.S. Federal Poverty Guideline

See HHS Poverty Guidelines for 2021, https://aspe.hhs.gov/poverty-guidelines.

	2 Person Household									
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED	Monthly CAP PROPOSED	Annual CAP PROPOSED	Burden - CAP PROPOSED
						2000 Gal.				
50% FPL	$ 8,710	$ 48.51	$ 582.12	7%	$ 58.30	$ 699.60	8%	$ 9.78	$ 117.36	1%
101% FPL	$ 17,421	$ 48.51	$ 582.12	3%	$ 58.30	$ 699.60	4%	$ 23.28	$ 279.36	2%
151% FPL	$ 26,131	$ 48.51	$ 582.12	2%	$ 58.30	$ 699.60	3%	$ 38.75	$ 465.00	2%
						3000 Gal				
50% FPL	$ 8,710	$ 56.49	$ 677.88	8%	$ 67.89	$ 814.68	9%	$ 19.37	$ 232.44	3%
101% FPL	$ 17,421	$ 56.49	$ 677.88	4%	$ 67.89	$ 814.68	5%	$ 32.88	$ 394.56	2%
151% FPL	$ 26,131	$ 56.49	$ 677.88	3%	$ 67.89	$ 814.68	3%	$ 48.34	$ 580.12	2%
						4000 Gal				
50% FPL	$ 8,710	$ 64.47	$ 773.64	9%	$ 77.49	$ 929.88	11%	$ 28.97	$ 347.64	4%
101% FPL	$ 17,421	$ 64.47	$ 773.64	4%	$ 77.49	$ 929.88	5%	$ 42.48	$ 509.76	3%
151% FPL	$ 26,131	$ 64.47	$ 773.64	3%	$ 77.49	$ 929.88	4%	$ 57.94	$ 695.28	3%
						5000 Gal				
50% FPL	$ 8,710	$ 72.45	$ 869.40	10%	$ 87.09	$ 1,045.08	12%	$ 38.57	$ 462.84	5%
101% FPL	$ 17,421	$ 72.45	$ 869.40	5%	$ 87.09	$ 1,045.08	6%	$ 52.08	$ 624.96	4%
151% FPL	$ 26,131	$ 72.45	$ 869.40	3%	$ 87.09	$ 1,045.08	4%	$ 67.54	$ 810.48	3%

	3 Person Household									
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED	Monthly CAP PROPOSED	Annual CAP PROPOSED	Burden - CAP PROPOSED
						2000 Gal.				
50% FPL	$ 10,980	$ 48.51	$ 582.12	5%	$ 58.30	$ 699.60	6%	$ 9.78	$ 117.36	1%
101% FPL	$ 21,961	$ 48.51	$ 582.12	3%	$ 58.30	$ 699.60	3%	$ 23.28	$ 279.36	1%
151% FPL	$ 32,941	$ 48.51	$ 582.12	2%	$ 58.30	$ 699.60	2%	$ 38.75	$ 465.00	1%
						3000 Gal				
50% FPL	$ 10,980	$ 56.49	$ 677.88	6%	$ 67.89	$ 814.68	7%	$ 19.37	$ 232.44	2%
101% FPL	$ 21,961	$ 56.49	$ 677.88	3%	$ 67.89	$ 814.68	4%	$ 32.88	$ 394.56	2%
151% FPL	$ 32,941	$ 56.49	$ 677.88	2%	$ 67.89	$ 814.68	2%	$ 48.34	$ 580.12	2%
						4000 Gal				
50% FPL	$ 10,980	$ 64.47	$ 773.64	7%	$ 77.49	$ 929.88	8%	$ 28.97	$ 347.64	3%
101% FPL	$ 21,961	$ 64.47	$ 773.64	4%	$ 77.49	$ 929.88	4%	$ 42.48	$ 509.76	2%
151% FPL	$ 32,941	$ 64.47	$ 773.64	2%	$ 77.49	$ 929.88	3%	$ 57.94	$ 695.28	2%
						5000 Gal				
50% FPL	$ 10,980	$ 72.45	$ 869.40	8%	$ 87.09	$ 1,045.08	10%	$ 38.57	$ 462.84	4%
101% FPL	$ 21,961	$ 72.45	$ 869.40	4%	$ 87.09	$ 1,045.08	5%	$ 52.08	$ 624.96	3%
151% FPL	$ 32,941	$ 72.45	$ 869.40	3%	$ 87.09	$ 1,045.08	3%	$ 67.54	$ 810.48	2%

	4 Person Household									
	Income	Monthly Full Tariff CURRENT	Annual Full Tariff CURRENT	Burden - Full Tariff CURRENT	Monthly Full Tariff PROPOSED	Annual Full Tariff PROPOSED	Burden - Full Tariff PROPOSED	Monthly CAP PROPOSED	Annual CAP PROPOSED	Burden - CAP PROPOSED
						2000 Gal.				
50% FPL	$ 13,250	$ 48.51	$ 582.12	4%	$ 58.30	$ 699.60	5%	$ 9.78	$ 117.36	1%
101% FPL	$ 26,501	$ 48.51	$ 582.12	2%	$ 58.30	$ 699.60	3%	$ 23.28	$ 279.36	1%
151% FPL	$ 39,751	$ 48.51	$ 582.12	1%	$ 58.30	$ 699.60	2%	$ 38.75	$ 465.00	1%
						3000 Gal				
50% FPL	$ 13,250	$ 56.49	$ 677.88	5%	$ 67.89	$ 814.68	6%	$ 19.37	$ 232.44	2%
101% FPL	$ 26,501	$ 56.49	$ 677.88	3%	$ 67.89	$ 814.68	3%	$ 32.88	$ 394.56	1%
151% FPL	$ 39,751	$ 56.49	$ 677.88	2%	$ 67.89	$ 814.68	2%	$ 48.34	$ 580.12	1%
						4000 Gal				
50% FPL	$ 13,250	$ 64.47	$ 773.64	6%	$ 77.49	$ 929.88	7%	$ 28.97	$ 347.64	3%
101% FPL	$ 26,501	$ 64.47	$ 773.64	3%	$ 77.49	$ 929.88	4%	$ 42.48	$ 509.76	2%
151% FPL	$ 39,751	$ 64.47	$ 773.64	2%	$ 77.49	$ 929.88	2%	$ 57.94	$ 695.28	2%
						5000 Gal				
50% FPL	$ 13,250	$ 72.45	$ 869.40	7%	$ 87.09	$ 1,045.08	8%	$ 38.57	$ 462.84	3%
101% FPL	$ 26,501	$ 72.45	$ 869.40	3%	$ 87.09	$ 1,045.08	4%	$ 52.08	$ 624.96	2%
151% FPL	$ 39,751	$ 72.45	$ 869.40	2%	$ 87.09	$ 1,045.08	3%	$ 67.54	$ 810.48	2%

THE COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

APPENDIX A

RESUME OF HARRY GELLER

RESUME OF HARRY S. GELLER

EDUCATIONAL BACKGROUND:

Harpur College, State University of New York at Binghamton, B.A. 1966
Washington College of Law, American University, J.D. 1969
New York University Law School, courses in Urban Affairs and Poverty Law, as part of Volunteers in Service to America (VISTA) Program 1969-1971

EMPLOYMENT:

1988 – 2015 Executive Director, Pennsylvania Utility Law Project (PULP), a project of the civil non-profit Pennsylvania Legal Aid Network. PULP is dedicated to providing technical support, information sharing, and representation to low-income individuals and organizations, assisting and advocating for the low income in utility and energy matters. Responsibilities include project oversight, case consultation, co-counseling, and participation on task forces, work groups and advisory panels, community education and training in utility and energy matters affecting the low-income.

While at PULP, served in the following capacities:

- Chairman, Low-Income Home Energy Assistance Program (LIHEAP) Advisory Committee to the Secretary, Pennsylvania Department of Human Services
- Member, Pennsylvania Public Utility Commission, Consumer Advisory Council
- Coordinator, Pennsylvania Legal Services Utility/Energy Work Groups
- Member, Weatherization Policy Advisory Committee to the Department of Community and Economic Development
- Member, PECO Universal Service Advisory Committee and LIURP Subcommittee

1974-1987 Staff Attorney, Managing Attorney and ultimately, Executive Director of Legal Services, Incorporated (LSI), a civil legal services program serving Adams, Cumberland, Franklin and Fulton Counties. Through a restructuring with other legal services programs, LSI became part of what is now known as MidPenn Legal Services and Franklin County Legal Services.

1971-1972 Staff Attorney, New York City Legal Aid Society, Criminal Court and Supreme Court Branches, New York County.

1969-1971 Volunteer in Service to America (VISTA) assigned to the New York University Law School Project on Urban Affairs and Poverty Law.

BAR ADMISSIONS

New York State
Commonwealth of Pennsylvania
United States District Court, Middle District of Pennsylvania

Cases in which Harry S. Geller has participated as a witness before the Pennsylvania Public Utility Commission since July 1, 2015

- Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority, R-2021-3024773, R-2021-3024774, R-2021-3024779.
- Pennsylvania Public Utility Commission v. Duquesne Light Company, R-2021- 3024750.
- Pennsylvania Public Utility Commission v. PECO Energy – Electric Division, R-2021-3024601.
- Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc., R-2021-3024296.
- Tenant Union Representative Network v. PECO Energy Company, C-2020-3021557
- Pennsylvania Public Utility Commission v. Philadelphia Gas Works, R-2020-3017206
- Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2021 through May 31 , 2025, Docket No. P-2020-3019356.
- Petition of PECO Energy Company for Approval of Its Default Service Program for the Period from June 1, 2021 through May 31, 2025, Docket No. P-2020-3019290.
- Petition of Duquesne Light Company For Approval of Default Service Plan For The Period June 1, 2021 Through May 31, 2025, Docket No. P-2020-3019522.
- Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for all of the Authority and Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC, and Peoples Gas Company LLC by way of the Purchase of all of LDC Funding LLC's Membership Interests by Aqua America, Inc., Docket Nos. A-2018-3006061, A-2018-3006062, A-2018-3006063.
- Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. et al. Docket Nos. R-2018-3003558 et seq.
- Pennsylvania Public Utility Commission v. Duquesne Light Company, Docket No. R-2018-3000124.
- Pennsylvania Public Utility Commission v. PECO Energy Company- Electric Division, Docket No. R-2018-3000164.
- Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2019 through May 31, 2023, Docket Nos. P-2017-2637855, P-2017-2637857, P-2017-2637858; P-2017-2637866.
- Pennsylvania Public Utility Commission et al. v. Philadelphia Gas Works, Docket No. R-2017-2586783.
- PECO Energy Company's Pilot Plan for an Advance Payments Program and Petition for Temporary Waiver of Portions of the Commission's Regulations with Respect to that Plan, Docket No. P-2016-2573023.
- Petition of PECO Energy Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2019, Docket No. P-2016-2534980.
- Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2526627.
- Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2543140.

- Pennsylvania Public Utility Commission et al. v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2016-2529660.
- Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2017 through May 31, 2019, Docket Nos. P-2015-2511333 , P-2015-25113351, P-2015-2511355; P-2015-2511356.
- Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan, Docket No. M-2015-2515642.

THE COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

APPENDIX B

CITED DISCOVERY RESPONSES

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY TO AQUA

- CAUSE-PA to Aqua I-4
- CAUSE-PA to Aqua I-6
- CAUSE-PA to Aqua I-14
- CAUSE-PA to Aqua I-17
- CAUSE-PA to Aqua I-18
- CAUSE-PA to Aqua I-21, revised
- CAUSE-PA to Aqua I-22
- CAUSE-PA to Aqua I-23
- CAUSE-PA to Aqua I-24
- CAUSE-PA to Aqua I-27
- CAUSE-PA to Aqua II-10
- CAUSE-PA to Aqua II-11
- CAUSE-PA to Aqua II-14
- CAUSE-PA to Aqua III-1 w/ attachment
- CAUSE-PA to Aqua III-3
- CAUSE-PA to Aqua III-4
- CAUSE-PA to Aqua III-5
- CAUSE-PA to Aqua III-6
- CAUSE-PA to Aqua III-7
- CAUSE-PA to Aqua III-12
- CAUSE-PA to Aqua III-14
- CAUSE-PA to Aqua III-15 w/ attachment
- CAUSE-PA to Aqua III-20
- CAUSE-PA to Aqua III-22 w/ attachment
- CAUSE-PA to Aqua IV-4
- CAUSE-PA to Aqua IV-5
- CAUSE-PA to Aqua IV-9
- CAUSE-PA to Aqua IV-11

OFFICE OF CONUSMER ADVOCATE TO AQUA

- OCA to Aqua II-3 w/ attachment
- OCA to Aqua II-8 w/ attachment
- OCA to Aqua II-9 w/ attachment
- OCA to Aqua II-21 w/ attachment
- OCA to Aqua II-22 w/ attachment
- OCA to Aqua II-29 w/attachment
- OCA to Aqua II-37 w/ attachment
- OCA to Aqua V-9
- OCA to Aqua V-19 w/ attachment
- OCA to Aqua V-20 w/ attachment

Witness: Georgetta Parisi-Knup
Date: October 19, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET I

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-I-4: As of the most recent available date, how many of Aqua's customers were/are categorized as "confirmed low income"? Please disaggregate by service type and rate zone, and explain how Aqua identifies customers as "confirmed low income."

RESPONSE: See response to OCA-II-23. A customer is categorized as low-income using the Federal Poverty Guidelines and for purposes of enrollment in the Company's Helping Hand program any customer whose income is at or below 200% of the Federal Poverty Level is eligible for the Company's low income program.

Witness: Georgetta Parisi-Knup
Date: 11/2/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET I

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-I-6: What is the average annual income of Aqua's currently identified confirmed low income customers?

RESPONSE: See below for the average annual income of Aqua's currently identified confirmed low income customers.

Average of Annual Income
$21,176.95

Witness: Georgetta Parisi-Knup
Date: October 19, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET I

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-I-14: What are Aqua's policies and procedures for awarding hardship grants? Please provide a copy of any written policies and/or procedures, memoranda, training materials, and other written documents which describe the policies and procedures related to awarding Hardship Grants.

RESPONSE: See attachment CAUSE-PA-I-14.

CAUSE-PA-I-14 Attachment

Covid19 PA Helping Hand Executive/Operational Customer Assistance

1. PA Executive or Operational staff, Coordinator or Team lead receives an inquiry from the customer who is indicated financial difficulty due to COVID 19.
    a. Be sure to label and handle as dispute if customer is also disputing bill.
    b. Billing dispute adjustments are abatements applied separate from grant credit.
        i. Abatements may require Director (>$250) and Presidents (>$1000) awareness prior to communication with customer and account posting.
2. PA Coordinator or Team lead reviews customer concern and account for potential financial assistance opportunities to offer customer in addition to grant (ex. PARR).
    a. Large metered customers (Ex. Commercial, etc.) can be offered PARR at level 4 guidelines
3. Any grant credit given toward a customer account should not be in place of a customer payment. Encourage customers to pay towards their account when and where possible.
    - Grant Credit Distribution (Based on Average Bill):
    -
        - $0-$50 - Average Bill: ($25 Grant Credit)
        - $51-$75 - Average Bill: ($50 Grant Credit)
        - $76+ - Average Bill: ($75 Grant Credit)

        Average Bill Period: March 1, 2020 to Present
    - Eligible customers should be informed of our intention to credit their account based on the above criteria.
4. For high usage or large metered accounts, grant credit can be calculated at 10% of the balance or high bill the customer is having difficulty paying.
    a. 10% credits exceeding $250 must be approved by the Customer Care Director prior to communication with customer and account posting.
5. Apply grant amount as credit (-) via New Charge Entry form using code CR74
    a. Instructions to apply grant is available in Knowledge base https://aquaservices.knowledgeowl.com/help/applying-customer-assistance-credits

Witness: Georgetta Parisi-Knup
Date: October 19, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET I

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-I-17: How does Aqua promote its hardship grant program? Please provide a copy of all written correspondence and/or marketing materials used to inform customers about the availability of the hardship grant program.

RESPONSE: See response to OCA-V-19.

Witness: Georgetta Parisi-Knup
Date: October 19, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET I

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-I-18: Has Aqua targeted any specific communities in its outreach for its low income programs?

a. If the answer is yes or in the affirmative, please indicate what specific communities Aqua has targeted, and how Aqua determined it would target such communities.

b. Please provide a list of all Helping Hand events that Aqua has participated in since 2018, identifying the date, location, and targeted audience.

RESPONSE: (a) See response to OCA-V-20.

(b) There have not been any Helping Hand events.

Witness: Georgetta Parisi-Knup
Date: October 19, 2021
Revised Response: November 3, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET I

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-I-21: From 2018 to present, how many of Aqua's customers were/are enrolled in the Helping Hand program? Please disaggregate by service type and month.

RESPONSE:

Data prior to May 2020 not available. Disaggregation by service type not available.

May 2020	June 2020	July 2020	Aug 2020	Sep 2020	Oct 2020	Nov 2020	Dec 2020	Jan 2021	Feb 2021	Mar 2021	Apr 2021	May 2021	June 2021	July 2021	Aug 2021
305	557	762	883	945	1016	1082	1208	1234	1224	1244	1260	1200	1212	994	876

Witness: Georgetta Parisi-Knup
Date: October 19, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET I

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-I-22: From 2018 to present, how many of Aqua's customers received hardship grants? Please disaggregate by service type and month.

RESPONSE: The hardship grant component of Aqua's assistance program began in 2020. See attachment CAUSE-PA-I- 22.

CAUSE-PA-I-22
Attachment

Helping Hand Grants	2021	21-Jan
	131	1
	2020	20-Jan
	68	0

21-Feb	21-Mar	21-Apr	21-May	21-Jun	21-Jul		
2	0	1	90	8	29		
20-Feb	**20-Mar**	**20-Apr**	**20-May**	**20-Jun**	**20-Jul**	**20-Aug**	**20-Sep**
0	0	0	6	15	14	2	2

20-Oct	**20-Nov**	**20-Dec**
20	6	3

Witness: Georgetta Parisi-Knup
Date: October 19, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET I

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-I-23: What conservation measures are currently offered through Aqua's low income programs?

RESPONSE: Conservation kits are provided to customers upon enrollment in Helping Hand. The conservation kits include leak detection tablets, a low flow shower head and low-flow aerators for kitchen faucets.

Witness: Georgetta Parisi-Knup
Date: October 19, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET I

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-I-24: Please describe the policies and procedures for eligibility for conservation measures in the Helping Hand Program. Please provide a copy of the written policies and/or procedures, memoranda, training materials, and other written documents which describe the policies and procedures for eligibility for conservation measures in the Program.

RESPONSE: All Helping Hand participants receive a conservation kit upon their enrollment in Helping Hand.

Witness: Georgetta Parisi-Knup
Date: October 19, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET I

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-I-27: For 2018 to present, please provide the median and mean arrearages for customers enrolled in the Helping Hand program disaggregated by FPIG income tiers (0-50% FPL; 51-100% FPL; 101-150% FPL) and month.

RESPONSE: See response to OCA-V-3.

Witness: Georgetta Parisi-Knup
Date: October 20, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET II

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-II-10: Has Aqua, or a third party on behalf of Aqua, conducted any formal or informal needs assessment regarding the need for translation or language access within Aqua's service territory? Please provide a copy of any such needs assessment.

RESPONSE: The Company has not conducted any assessments.

Witness: Georgetta Parisi-Knup
Date: October 20, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET II

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-II-11: Please provide a list of Aqua's written materials that have been translated in a language other than English, and identify the languages in which those materials are made available and provide copies of all translated documents.

RESPONSE: Aqua's written materials have not been translated in a language other than English. The Company's notices do contain the statement in Spanish required by 52 Pa. Code §56.91(17) directing Spanish-speaking customers to a number to call for information and translation assistance. See response to OCA-II-29 for copies of the Company notices.

Witness: Rita Black
Date: October 20, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET II

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-II-14: How does Aqua define "substantial number of Spanish-speaking customers" for compliance with 52 Pa. Code § 56.201(b)?

RESPONSE: At any given time, the Company has customer service representative staff available to interpret for non-English speaking customers. The Company's interactive voice response ("IVR") system provides Spanish translation prompts, which if chosen are routed to our Spanish speaking associates. The Company does not have any written documents as the customer are directed to a Spanish speaking associate through the IVR. The Company has 7 customer service representatives who are fluent in Spanish.

Based on our experience, Aqua PA does not believe its potential Spanish speaking population to be substantial.

Witness: Georgetta Parisi-Knup
Date: 11/1/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET III

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-III-1: From 2018 to present, please provide the median and mean residential customer usage, disaggregated by month, year and service type, for each of the following groups:

a. All residential customers;
b. Confirmed low income customers;
c. Helping Hand customers.

RESPONSE:

Please refer to the electronic file CAUSE-PA-III-1 Attachment 1.xlsx for the mean and median customer usage data.

RES	MONTH	TYPE	COUNT	TOT CONS	AVG	MEDIAN
RES	2018_01	W	353500	14800317	41.9	36
RES	2018_02	W	353708	14147913	40	34
RES	2018_03	W	354774	12770005	36	31
RES	2018_04	W	354803	13687095	38.6	34
RES	2018_05	W	354724	13912802	39.2	34
RES	2018_06	W	355660	16158707	45.4	38
RES	2018_07	W	355130	15973319	45	35
RES	2018_08	W	355851	14964880	42.1	33
RES	2018_09	W	354639	15803369	44.6	36
RES	2018_10	W	354989	13198931	37.2	31
RES	2018_11	W	355065	14240405	40.1	34
RES	2018_12	W	355568	13822003	38.9	34
RES	2019_01	W	355452	14243998	40.1	35
RES	2019_02	W	355244	14034638	39.5	34
RES	2019_03	W	355884	12683179	35.6	31
RES	2019_04	W	356048	13166981	37	32
RES	2019_05	W	356212	14003146	39.3	34
RES	2019_06	W	356720	15502630	43.5	36
RES	2019_07	W	356668	14796175	41.5	33
RES	2019_08	W	356218	15942198	44.8	35
RES	2019_09	W	357041	15653819	43.8	35
RES	2019_10	W	356417	14428229	40.5	32
RES	2019_11	W	356141	14189933	39.8	34
RES	2019_12	W	356820	13843833	38.8	34
RES	2020_01	W	356448	13852288	38.9	34
RES	2020_02	W	356276	13633621	38.3	33
RES	2020_03	W	357352	12900019	36.1	31
RES	2020_04	W	357161	14948517	41.9	37
RES	2020_05	W	357088	15213738	42.6	37
RES	2020_06	W	358344	16790694	46.9	39
RES	2020_07	W	358260	18711007	52.2	41
RES	2020_08	W	358340	17316361	48.3	38
RES	2020_09	W	358766	15992374	44.6	35
RES	2020_10	W	358648	15522827	43.3	35
RES	2020_11	W	358350	14567230	40.7	35
RES	2020_12	W	359247	14235846	39.6	34
RES	2021_01	W	358792	15448860	43.1	37
RES	2021_02	W	359334	13955377	38.8	33
RES	2021_03	W	360480	13155691	36.5	31
RES	2021_04	W	360331	14892438	41.3	36
RES	2021_05	W	360601	14985843	41.6	35
RES	2021_06	W	361767	16072168	44.4	35
RES	2021_07	W	361652	16522446	45.7	36
RES	2021_08	W	361790	16196410	44.8	34
RES	2021_09	W	362647	15437890	42.6	34

RES	MONTH	TYPE	COUNT	TOT CONS	AVG	MEDIAN
RES	2018_01	S	211	8578	40.7	25
RES	2018_02	S	443	14372	32.4	30
RES	2018_03	S	7361	635285	86.3	98
RES	2018_04	S	464	16295	35.1	32
RES	2018_05	S	485	15761	32.5	29
RES	2018_06	S	7367	910017	123.5	107
RES	2018_07	S	4881	211194	43.3	37
RES	2018_08	S	1208	91975	76.1	59
RES	2018_09	S	6610	425171	64.3	39
RES	2018_10	S	4823	211588	43.9	37
RES	2018_11	S	9185	193044	21	34
RES	2018_12	S	7314	542043	74.1	49
RES	2019_01	S	4751	200757	42.3	37
RES	2019_02	S	9204	707433	76.9	55
RES	2019_03	S	7312	468118	64	42
RES	2019_04	S	4884	188845	38.7	34
RES	2019_05	S	9305	660715	71	52
RES	2019_06	S	7398	503274	68	45
RES	2019_07	S	4940	209010	42.3	35
RES	2019_08	S	9336	1732717	185.6	52
RES	2019_09	S	7463	558210	74.8	50
RES	2019_10	S	4886	199370	40.8	33
RES	2019_11	S	9339	737472	79	54
RES	2019_12	S	7422	491682	66.2	40
RES	2020_01	S	5017	222930	44.4	37
RES	2020_02	S	9334	702820	75.3	54
RES	2020_03	S	7518	495728	65.9	40
RES	2020_04	S	5025	210069	41.8	37
RES	2020_05	S	9387	711293	75.8	54
RES	2020_06	S	7532	548246	72.8	50
RES	2020_07	S	9257	448333	48.4	40
RES	2020_08	S	9218	448994	48.7	40
RES	2020_09	S	10515	701062	66.7	43
RES	2020_10	S	5117	254053	49.6	37
RES	2020_11	S	9584	555484	58	40
RES	2020_12	S	10152	709716	69.9	46
RES	2021_01	S	9316	407716	43.8	37
RES	2021_02	S	9161	380742	41.6	35
RES	2021_03	S	11707	668962	57.1	37
RES	2021_04	S	9375	388153	41.4	34
RES	2021_05	S	9289	382645	41.2	34
RES	2021_06	S	11877	725802	61.1	40
RES	2021_07	S	9524	421333	44.2	35
RES	2021_08	S	9475	402454	42.5	34
RES	2021_09	S	11888	731373	61.5	40

RES	MONTH	TYPE	COUNT	TOT CONS	AVG	MEDIAN
RES	2018_01	B	26184	997109	38.1	32
RES	2018_02	B	26135	968207	37	31
RES	2018_03	B	26181	843971	32.2	27
RES	2018_04	B	26194	913346	34.9	30
RES	2018_05	B	26215	887338	33.8	29
RES	2018_06	B	26200	1028227	39.2	32
RES	2018_07	B	26286	998736	38	31
RES	2018_08	B	26312	934274	35.5	29
RES	2018_09	B	26234	1026656	39.1	32
RES	2018_10	B	26273	857078	32.6	27
RES	2018_11	B	26233	943318	36	30
RES	2018_12	B	26248	903997	34.4	29
RES	2019_01	B	26223	928173	35.4	30
RES	2019_02	B	26204	979930	37.4	31
RES	2019_03	B	26258	834153	31.8	27
RES	2019_04	B	26325	865747	32.9	28
RES	2019_05	B	26359	884850	33.6	29
RES	2019_06	B	26385	982090	37.2	31
RES	2019_07	B	26375	955843	36.2	30
RES	2019_08	B	26335	997366	37.9	30
RES	2019_09	B	26381	1025586	38.9	31
RES	2019_10	B	26395	926784	35.1	29
RES	2019_11	B	26369	896052	34	28
RES	2019_12	B	26276	882081	33.6	29
RES	2020_01	B	26174	915284	35	30
RES	2020_02	B	26238	899626	34.3	29
RES	2020_03	B	26335	854165	32.4	27
RES	2020_04	B	26334	974875	37	32
RES	2020_05	B	26350	973950	37	32
RES	2020_06	B	26397	1054931	40	33
RES	2020_07	B	26438	1142089	43.2	35
RES	2020_08	B	26409	1070959	40.6	33
RES	2020_09	B	26409	1027060	38.9	32
RES	2020_10	B	26471	978421	37	30
RES	2020_11	B	26422	943468	35.7	30
RES	2020_12	B	26444	924667	35	30
RES	2021_01	B	26440	1033973	39.1	33
RES	2021_02	B	26469	932584	35.2	30
RES	2021_03	B	26516	869580	32.8	27
RES	2021_04	B	26549	967520	36.4	31
RES	2021_05	B	26595	954939	35.9	30
RES	2021_06	B	26616	988924	37.2	30
RES	2021_07	B	26759	1053598	39.4	32
RES	2021_08	B	26687	971507	36.4	29
RES	2021_09	B	26740	976652	36.5	29

LOW	MONTH	TYPE	COUNT	TOT CONS	AVG	MEDIAN
LOW	2018_01	W	12210	647209	53	44
LOW	2018_02	W	12580	669029	53.2	44
LOW	2018_03	W	12886	590406	45.8	39
LOW	2018_04	W	13026	634350	48.7	42
LOW	2018_05	W	13115	625896	47.7	41
LOW	2018_06	W	13191	723996	54.9	46
LOW	2018_07	W	13350	701583	52.6	43
LOW	2018_08	W	13503	691297	51.2	42
LOW	2018_09	W	13642	760731	55.8	46
LOW	2018_10	W	13819	649405	47	39
LOW	2018_11	W	13911	713670	51.3	43
LOW	2018_12	W	14047	686813	48.9	41
LOW	2019_01	W	14276	706936	49.5	42
LOW	2019_02	W	14474	735764	50.8	43
LOW	2019_03	W	14644	677687	46.3	38
LOW	2019_04	W	14800	679411	45.9	39
LOW	2019_05	W	14802	709766	48	41
LOW	2019_06	W	14819	780248	52.7	45
LOW	2019_07	W	14934	724783	48.5	40
LOW	2019_08	W	15081	802826	53.2	44
LOW	2019_09	W	15203	803523	52.9	43
LOW	2019_10	W	15374	717110	46.6	38
LOW	2019_11	W	15473	789187	51	43
LOW	2019_12	W	15548	750952	48.3	40
LOW	2020_01	W	15729	778832	49.5	42
LOW	2020_02	W	15938	776164	48.7	41
LOW	2020_03	W	16162	717052	44.4	37
LOW	2020_04	W	16223	828430	51.1	44
LOW	2020_05	W	16328	825060	50.5	43
LOW	2020_06	W	16469	859907	52.2	44
LOW	2020_07	W	16625	961937	57.9	47
LOW	2020_08	W	16765	943677	56.3	45
LOW	2020_09	W	16871	887376	52.6	42
LOW	2020_10	W	16988	869422	51.2	41
LOW	2020_11	W	17242	880641	51.1	42
LOW	2020_12	W	18334	876433	47.8	39
LOW	2021_01	W	18656	1019055	54.6	44
LOW	2021_02	W	18806	870627	46.3	38
LOW	2021_03	W	18935	859759	45.4	37
LOW	2021_04	W	19151	989066	51.6	43
LOW	2021_05	W	19237	897329	46.6	38
LOW	2021_06	W	19238	946324	49.2	40
LOW	2021_07	W	19157	1031202	53.8	43
LOW	2021_08	W	19190	968281	50.5	39
LOW	2021_09	W	19264	1009752	52.4	41

LOW	MONTH	TYPE	COUNT	TOT CONS	AVG	MEDIAN
LOW	2018_01	S				
LOW	2018_02	S				
LOW	2018_03	S	5	770	154	140
LOW	2018_04	S				
LOW	2018_05	S				
LOW	2018_06	S	6	790	131.7	110
LOW	2018_07	S	1	84	84	84
LOW	2018_08	S	8	1078	134.8	130
LOW	2018_09	S	3	75	25	14
LOW	2018_10	S	3	89	29.7	35
LOW	2018_11	S	4	139	34.8	35
LOW	2018_12	S	10	1107	110.7	54
LOW	2019_01	S	5	445	89	41
LOW	2019_02	S	10	479	47.9	39
LOW	2019_03	S	18	1511	83.9	46.5
LOW	2019_04	S	12	423	35.3	33
LOW	2019_05	S	10	458	45.8	43
LOW	2019_06	S	19	1635	86.1	54
LOW	2019_07	S	12	573	47.8	42.5
LOW	2019_08	S	14	2131	152.2	52.5
LOW	2019_09	S	24	2896	120.7	67
LOW	2019_10	S	16	984	61.5	48.5
LOW	2019_11	S	18	951	52.8	48.5
LOW	2019_12	S	27	2468	91.4	50
LOW	2020_01	S	21	964	45.9	44
LOW	2020_02	S	19	972	51.2	47
LOW	2020_03	S	26	1829	70.3	44
LOW	2020_04	S	20	865	43.3	39
LOW	2020_05	S	20	928	46.4	41.5
LOW	2020_06	S	27	1905	70.6	50
LOW	2020_07	S	19	1048	55.2	47
LOW	2020_08	S	19	993	52.3	51
LOW	2020_09	S	28	1909	68.2	47.5
LOW	2020_10	S	20	906	45.3	39
LOW	2020_11	S	20	925	46.3	38
LOW	2020_12	S	37	2251	60.8	43
LOW	2021_01	S	32	1817	56.8	48.5
LOW	2021_02	S	35	2103	60.1	44
LOW	2021_03	S	50	2776	55.5	38.5
LOW	2021_04	S	48	3578	74.5	43
LOW	2021_05	S	46	2437	53	38.5
LOW	2021_06	S	59	3359	56.9	46
LOW	2021_07	S	52	2916	56.1	48
LOW	2021_08	S	54	2669	49.4	44
LOW	2021_09	S	69	4672	67.7	49

LOW	MONTH	TYPE	COUNT	AVG	MEDIAN
LOW	2018_01	B	538	62.9	47
LOW	2018_02	B	557	59.2	44
LOW	2018_03	B	566	46.9	40
LOW	2018_04	B	576	50.2	43
LOW	2018_05	B	582	51.3	41
LOW	2018_06	B	588	55.7	47
LOW	2018_07	B	595	55.1	43
LOW	2018_08	B	600	52.3	42
LOW	2018_09	B	619	55.4	45
LOW	2018_10	B	620	50.2	39
LOW	2018_11	B	636	50.9	43
LOW	2018_12	B	640	53.2	43.5
LOW	2019_01	B	639	50.1	42
LOW	2019_02	B	648	53.4	45
LOW	2019_03	B	651	46.3	37
LOW	2019_04	B	662	45.8	39
LOW	2019_05	B	660	47.2	41
LOW	2019_06	B	658	52.5	46
LOW	2019_07	B	664	52	43
LOW	2019_08	B	670	56.3	45
LOW	2019_09	B	676	57.7	45
LOW	2019_10	B	679	49	41
LOW	2019_11	B	674	47	39
LOW	2019_12	B	678	46.1	40
LOW	2020_01	B	661	48.6	42
LOW	2020_02	B	668	48.9	40
LOW	2020_03	B	676	52	39
LOW	2020_04	B	686	53.7	46
LOW	2020_05	B	703	52.5	44
LOW	2020_06	B	724	56.2	46
LOW	2020_07	B	750	62.6	49.5
LOW	2020_08	B	767	60.7	47
LOW	2020_09	B	784	55.7	45
LOW	2020_10	B	798	56	43
LOW	2020_11	B	827	48.6	42
LOW	2020_12	B	906	49.8	41
LOW	2021_01	B	927	55	45
LOW	2021_02	B	939	51.1	39
LOW	2021_03	B	945	46.5	37
LOW	2021_04	B	962	51	42.5
LOW	2021_05	B	972	52.4	40
LOW	2021_06	B	989	55.3	40
LOW	2021_07	B	989	56.5	43
LOW	2021_08	B	984	51.1	39
LOW	2021_09	B	978	52.5	41

HHT	MONTH	TYPE	COUNT	TOT CONS	AVG	MEDIAN
HHT	2018_01	W	189	11579	61.3	50
HHT	2018_02	W	179	12135	67.8	51
HHT	2018_03	W	163	8472	52	45
HHT	2018_04	W	156	9384	60.2	53
HHT	2018_05	W	156	11545	74	52.4
HHT	2018_06	W	162	11890	73.4	59
HHT	2018_07	W	164	10672	65.1	54
HHT	2018_08	W	169	9941	58.8	53
HHT	2018_09	W	170	10769	63.3	58.5
HHT	2018_10	W	173	9075	52.5	50
HHT	2018_11	W	171	9961	58.3	48
HHT	2018_12	W	168	9889	58.9	50
HHT	2019_01	W	158	9464	59.9	50
HHT	2019_02	W	138	8618	62.4	52.5
HHT	2019_03	W	130	7659	58.9	48.5
HHT	2019_04	W	128	7195	56.2	48
HHT	2019_05	W	128	6956	54.3	48.5
HHT	2019_06	W	140	9383	67	53.5
HHT	2019_07	W	146	8453	57.9	47
HHT	2019_08	W	135	8771	65	56
HHT	2019_09	W	142	9119	64.2	52.5
HHT	2019_10	W	146	7787	53.3	44
HHT	2019_11	W	157	8529	54.3	49
HHT	2019_12	W	163	8346	51.2	45
HHT	2020_01	W	164	9891	60.3	49
HHT	2020_02	W	160	8706	54.4	49
HHT	2020_03	W	163	7868	48.3	44
HHT	2020_04	W	153	8704	56.9	52
HHT	2020_05	W	158	8915	56.4	49.5
HHT	2020_06	W	351	21465	61.2	53
HHT	2020_07	W	591	43675	73.9	58
HHT	2020_08	W	755	52811	69.9	54
HHT	2020_09	W	839	55654	66.3	51
HHT	2020_10	W	895	58326	65.2	50
HHT	2020_11	W	953	60767	63.8	50
HHT	2020_12	W	1044	60182	57.6	46
HHT	2021_01	W	1109	70259	63.4	51
HHT	2021_02	W	1124	60947	54.2	44
HHT	2021_03	W	1130	58919	52.1	41
HHT	2021_04	W	1132	67852	59.9	49.5
HHT	2021_05	W	1160	64469	55.6	44
HHT	2021_06	W	1118	68582	61.3	47
HHT	2021_07	W	1101	75496	68.6	50
HHT	2021_08	W	919	57710	62.8	46
HHT	2021_09	W	840	57110	68	48

HHT	MONTH	TYPE	COUNT	AVG	MEDIAN
HHT	2018_01	S			
HHT	2018_02	S			
HHT	2018_03	S			
HHT	2018_04	S			
HHT	2018_05	S			
HHT	2018_06	S			
HHT	2018_07	S			
HHT	2018_08	S			
HHT	2018_09	S			
HHT	2018_10	S			
HHT	2018_11	S			
HHT	2018_12	S			
HHT	2019_01	S			
HHT	2019_02	S			
HHT	2019_03	S			
HHT	2019_04	S			
HHT	2019_05	S			
HHT	2019_06	S			
HHT	2019_07	S			
HHT	2019_08	S			
HHT	2019_09	S			
HHT	2019_10	S			
HHT	2019_11	S			
HHT	2019_12	S			
HHT	2020_01	S			
HHT	2020_02	S			
HHT	2020_03	S			
HHT	2020_04	S			
HHT	2020_05	S			
HHT	2020_06	S			
HHT	2020_07	S			
HHT	2020_08	S	1	77	77	77
HHT	2020_09	S			
HHT	2020_10	S			
HHT	2020_11	S			
HHT	2020_12	S			
HHT	2021_01	S			
HHT	2021_02	S	1	37	37	37
HHT	2021_03	S	1	26	26	26
HHT	2021_04	S	1	32	32	32
HHT	2021_05	S			
HHT	2021_06	S	1	50	50	50
HHT	2021_07	S			
HHT	2021_08	S			
HHT	2021_09	S			

HHT	MONTH	TYPE	COUNT	AVG	MEDIAN
HHT	2018_01	B	6	38.7	38.5
HHT	2018_02	B	5	39.2	39
HHT	2018_03	B	5	38.4	34
HHT	2018_04	B	6	43.3	40
HHT	2018_05	B	6	39.5	37.5
HHT	2018_06	B	7	41.1	37
HHT	2018_07	B	6	43.8	40.5
HHT	2018_08	B	8	36.5	35.5
HHT	2018_09	B	8	45.6	47
HHT	2018_10	B	7	42.9	41
HHT	2018_11	B	6	30.2	29
HHT	2018_12	B	6	57.8	51.5
HHT	2019_01	B	6	41	42
HHT	2019_02	B	5	61.2	69
HHT	2019_03	B	4	47.3	45.5
HHT	2019_04	B	4	62	50.5
HHT	2019_05	B	6	42.3	42.5
HHT	2019_06	B	6	32.3	32
HHT	2019_07	B	6	38.7	38.5
HHT	2019_08	B	6	36	33
HHT	2019_09	B	7	44.7	36
HHT	2019_10	B	7	39.4	39
HHT	2019_11	B	8	43.1	42.5
HHT	2019_12	B	8	43.5	41
HHT	2020_01	B	6	44.2	42.5
HHT	2020_02	B	7	46.4	50
HHT	2020_03	B	7	42.6	42
HHT	2020_04	B	6	57	59
HHT	2020_05	B	10	52.1	54
HHT	2020_06	B	18	59.5	42
HHT	2020_07	B	30	59.6	48
HHT	2020_08	B	39	83.5	56
HHT	2020_09	B	44	61.5	56
HHT	2020_10	B	48	56.9	51.5
HHT	2020_11	B	48	56.6	52
HHT	2020_12	B	52	55.4	46
HHT	2021_01	B	52	57.6	53
HHT	2021_02	B	55	70.5	46
HHT	2021_03	B	54	47.3	39
HHT	2021_04	B	54	55.3	46.5
HHT	2021_05	B	54	49.3	39.5
HHT	2021_06	B	51	73.9	45
HHT	2021_07	B	49	88.7	52
HHT	2021_08	B	38	48.9	41
HHT	2021_09	B	36	55.4	50.5

	A	B	C
1			
2			
3		**All RESIDENTIAL accounts (includes helping hand and low income)**	**Water only properties**
4			
5			
6			
7			**Wastewater only properties**
8			
9			
10			
11			**Water and Wastewater properties**
12			
13			
14			
15			
16		**RESIDENTIAL LOW INCOME accounts (1, 2A)**	**Water only properties**
17			
18			
19			
20			**Wastewater only properties**
21			
22			
23			
24			**Water and Wastewater properties**
25			
26			
27			
28			
29		**RESIDENTIAL HHT**	**Water only properties**
30			
31			
32			
33			**Wastewater only properties**
34			
35			
36			
37			**Water and Wastewater properties**
38			
39			
40			

	D	E	F	G	H	I	J	K
1								
2		2018_01	2018_02	2018_03	2018_04	2018_05	2018_06	2018_07
3	Total number of accounts	353,500	353,708	354,774	354,803	354,724	355,660	355,130
4	Total consumption	14,800,317	14,147,913	12,770,005	13,687,095	13,912,802	16,158,707	15,973,319
5	Average consumption	41.9	40.0	36.0	38.6	39.2	45.4	45.0
6	Median consumption	36.0	34.0	31.0	34.0	34.0	38.0	35.0
7	Total number of accounts	211	443	7,361	464	485	7,367	4,881
8	Total consumption	8,578	14,372	635,285	16,295	15,761	910,017	211,194
9	Average consumption	40.7	32.4	86.3	35.1	32.5	123.5	43.3
10	Median consumption	25.0	30.0	98.0	32.0	29.0	107.0	37.0
11	Total number of accounts	26,184	26,135	26,181	26,194	26,215	26,200	26,286
12	Total consumption	997,109	968,207	843,971	913,346	887,338	1,028,227	998,736
13	Average consumption	38.1	37.0	32.2	34.9	33.8	39.2	38.0
14	Median consumption	32.0	31.0	27.0	30.0	29.0	32.0	31.0
15								
16	Total number of accounts	12,210	12,580	12,886	13,026	13,115	13,191	13,350
17	Total consumption	647,209	669,029	590,406	634,350	625,896	723,996	701,583
18	Average consumption	53.0	53.2	45.8	48.7	47.7	54.9	52.6
19	Median consumption	44.0	44.0	39.0	42.0	41.0	46.0	43.0
20	Total number of accounts			5			6	1
21	Total consumption			770			790	84
22	Average consumption			154.0			131.7	84.0
23	Median consumption			140.0			110.0	84.0
24	Total number of accounts	538	557	566	576	582	588	595
25	Total consumption	33,819	32,958	26,572	28,924	29,884	32,777	32,771
26	Average consumption	62.9	59.2	46.9	50.2	51.3	55.7	55.1
27	Median consumption	47.0	44.0	40.0	43.0	41.0	47.0	43.0
28								
29	Total number of accounts	189	179	163	156	156	162	164
30	Total consumption	11,579	12,135	8,472	9,384	11,545	11,890	10,672
31	Average consumption	61.3	67.8	52.0	60.2	74.0	73.4	65.1
32	Median consumption	50.0	51.0	45.0	53.0	52.4	59.0	54.0
33	Total number of accounts							
34	Total consumption							
35	Average consumption							
36	Median consumption							
37	Total number of accounts	6	5	5	6	6	7	6
38	Total consumption	232	196	192	260	237	288	263
39	Average consumption	38.7	39.2	38.4	43.3	39.5	41.1	43.8
40	Median consumption	38.5	39.0	34.0	40.0	37.5	37.0	40.5

	L	M	N	O	P	Q	R	S	T	U
1										
2	**2018_08**	**2018_09**	**2018_10**	**2018_11**	**2018_12**	**2019_01**	**2019_02**	**2019_03**	**2019_04**	**2019_05**
3	355,851	354,639	354,989	355,065	355,568	355,452	355,244	355,884	356,048	356,212
4	14,964,880	15,803,369	13,198,931	14,240,405	13,822,003	14,243,998	14,034,638	12,683,179	13,166,981	14,003,146
5	42.1	44.6	37.2	40.1	38.9	40.1	39.5	35.6	37.0	39.3
6	33.0	36.0	31.0	34.0	34.0	35.0	34.0	31.0	32.0	34.0
7	1,208	6,610	4,823	9,185	7,314	4,751	9,204	7,312	4,884	9,305
8	91,975	425,171	211,588	193,044	542,043	200,757	707,433	468,118	188,845	660,715
9	76.1	64.3	43.9	21.0	74.1	42.3	76.9	64.0	38.7	71.0
10	59.0	39.0	37.0	34.0	49.0	37.0	55.0	42.0	34.0	52.0
11	26,312	26,234	26,273	26,233	26,248	26,223	26,204	26,258	26,325	26,359
12	934,274	1,026,656	857,078	943,318	903,997	928,173	979,930	834,153	865,747	884,850
13	35.5	39.1	32.6	36.0	34.4	35.4	37.4	31.8	32.9	33.6
14	29.0	32.0	27.0	30.0	29.0	30.0	31.0	27.0	28.0	29.0
15										
16	13,503	13,642	13,819	13,911	14,047	14,276	14,474	14,644	14,800	14,802
17	691,297	760,731	649,405	713,670	686,813	706,936	735,764	677,687	679,411	709,766
18	51.2	55.8	47.0	51.3	48.9	49.5	50.8	46.3	45.9	48.0
19	42.0	46.0	39.0	43.0	41.0	42.0	43.0	38.0	39.0	41.0
20	8	3	3	4	10	5	10	18	12	10
21	1,078	75	89	139	1,107	445	479	1,511	423	458
22	134.8	25.0	29.7	34.8	110.7	89.0	47.9	83.9	35.3	45.8
23	130.0	14.0	35.0	35.0	54.0	41.0	39.0	46.5	33.0	43.0
24	600	619	620	636	640	639	648	651	662	660
25	31,374	34,310	31,131	32,372	34,041	32,003	34,577	30,162	30,327	31,149
26	52.3	55.4	50.2	50.9	53.2	50.1	53.4	46.3	45.8	47.2
27	42.0	45.0	39.0	43.0	43.5	42.0	45.0	37.0	39.0	41.0
28										
29	169	170	173	171	168	158	138	130	128	128
30	9,941	10,769	9,075	9,961	9,889	9,464	8,618	7,659	7,195	6,956
31	58.8	63.3	52.5	58.3	58.9	59.9	62.4	58.9	56.2	54.3
32	53.0	58.5	50.0	48.0	50.0	50.0	52.5	48.5	48.0	48.5
33										
34										
35										
36										
37	8	8	7	6	6	6	5	4	4	6
38	292	365	300	181	347	246	306	189	248	254
39	36.5	45.6	42.9	30.2	57.8	41.0	61.2	47.3	62.0	42.3
40	35.5	47.0	41.0	29.0	51.5	42.0	69.0	45.5	50.5	42.5

	V	W	X	Y	Z	AA	AB	AC	AD	AE
1										
2	**2019_06**	**2019_07**	**2019_08**	**2019_09**	**2019_10**	**2019_11**	**2019_12**	**2020_01**	**2020_02**	**2020_03**
3	356,720	356,668	356,218	357,041	356,417	356,141	356,820	356,448	356,276	357,352
4	15,502,630	14,796,175	15,942,198	15,653,819	14,428,229	14,189,933	13,843,833	13,852,288	13,633,621	12,900,019
5	43.5	41.5	44.8	43.8	40.5	39.8	38.8	38.9	38.3	36.1
6	36.0	33.0	35.0	35.0	32.0	34.0	34.0	34.0	33.0	31.0
7	7,398	4,940	9,336	7,463	4,886	9,339	7,422	5,017	9,334	7,518
8	503,274	209,010	1,732,717	558,210	199,370	737,472	491,682	222,930	702,820	495,728
9	68.0	42.3	185.6	74.8	40.8	79.0	66.2	44.4	75.3	65.9
10	45.0	35.0	52.0	50.0	33.0	54.0	40.0	37.0	54.0	40.0
11	26,385	26,375	26,335	26,381	26,395	26,369	26,276	26,174	26,238	26,335
12	982,090	955,843	997,366	1,025,586	926,784	896,052	882,081	915,284	899,626	854,165
13	37.2	36.2	37.9	38.9	35.1	34.0	33.6	35.0	34.3	32.4
14	31.0	30.0	30.0	31.0	29.0	28.0	29.0	30.0	29.0	27.0
15										
16	14,819	14,934	15,081	15,203	15,374	15,473	15,548	15,729	15,938	16,162
17	780,248	724,783	802,826	803,523	717,110	789,187	750,952	778,832	776,164	717,052
18	52.7	48.5	53.2	52.9	46.6	51.0	48.3	49.5	48.7	44.4
19	45.0	40.0	44.0	43.0	38.0	43.0	40.0	42.0	41.0	37.0
20	19	12	14	24	16	18	27	21	19	26
21	1,635	573	2,131	2,896	984	951	2,468	964	972	1,829
22	86.1	47.8	152.2	120.7	61.5	52.8	91.4	45.9	51.2	70.3
23	54.0	42.5	52.5	67.0	48.5	48.5	50.0	44.0	47.0	44.0
24	658	664	670	676	679	674	678	661	668	676
25	34,576	34,539	37,738	39,031	33,249	31,666	31,267	32,126	32,696	35,169
26	52.5	52.0	56.3	57.7	49.0	47.0	46.1	48.6	48.9	52.0
27	46.0	43.0	45.0	45.0	41.0	39.0	40.0	42.0	40.0	39.0
28										
29	140	146	135	142	146	157	163	164	160	163
30	9,383	8,453	8,771	9,119	7,787	8,529	8,346	9,891	8,706	7,868
31	67.0	57.9	65.0	64.2	53.3	54.3	51.2	60.3	54.4	48.3
32	53.5	47.0	56.0	52.5	44.0	49.0	45.0	49.0	49.0	44.0
33										
34										
35										
36										
37	6	6	6	7	7	8	8	6	7	7
38	194	232	216	313	276	345	348	265	325	298
39	32.3	38.7	36.0	44.7	39.4	43.1	43.5	44.2	46.4	42.6
40	32.0	38.5	33.0	36.0	39.0	42.5	41.0	42.5	50.0	42.0

	AF	AG	AH	AI	AJ	AK	AL	AM	AN	AO
1										
2	**2020_04**	**2020_05**	**2020_06**	**2020_07**	**2020_08**	**2020_09**	**2020_10**	**2020_11**	**2020_12**	**2021_01**
3	357,161	357,088	358,344	358,260	358,340	358,766	358,648	358,350	359,247	358,792
4	14,948,517	15,213,738	16,790,694	18,711,007	17,316,361	15,992,374	15,522,827	14,567,230	14,235,846	15,448,860
5	41.9	42.6	46.9	52.2	48.3	44.6	43.3	40.7	39.6	43.1
6	37.0	37.0	39.0	41.0	38.0	35.0	35.0	35.0	34.0	37.0
7	5,025	9,387	7,532	9,257	9,218	10,515	5,117	9,584	10,152	9,316
8	210,069	711,293	548,246	448,333	448,994	701,062	254,053	555,484	709,716	407,716
9	41.8	75.8	72.8	48.4	48.7	66.7	49.6	58.0	69.9	43.8
10	37.0	54.0	50.0	40.0	40.0	43.0	37.0	40.0	46.0	37.0
11	26,334	26,350	26,397	26,438	26,409	26,409	26,471	26,422	26,444	26,440
12	974,875	973,950	1,054,931	1,142,089	1,070,959	1,027,060	978,421	943,468	924,667	1,033,973
13	37.0	37.0	40.0	43.2	40.6	38.9	37.0	35.7	35.0	39.1
14	32.0	32.0	33.0	35.0	33.0	32.0	30.0	30.0	30.0	33.0
15										
16	16,223	16,328	16,469	16,625	16,765	16,871	16,988	17,242	18,334	18,656
17	828,430	825,060	859,907	961,937	943,677	887,376	869,422	880,641	876,433	1,019,055
18	51.1	50.5	52.2	57.9	56.3	52.6	51.2	51.1	47.8	54.6
19	44.0	43.0	44.0	47.0	45.0	42.0	41.0	42.0	39.0	44.0
20	20	20	27	19	19	28	20	20	37	32
21	865	928	1,905	1,048	993	1,909	906	925	2,251	1,817
22	43.3	46.4	70.6	55.2	52.3	68.2	45.3	46.3	60.8	56.8
23	39.0	41.5	50.0	47.0	51.0	47.5	39.0	38.0	43.0	48.5
24	686	703	724	750	767	784	798	827	906	927
25	36,824	36,929	40,679	46,975	46,595	43,678	44,725	40,157	45,143	51,020
26	53.7	52.5	56.2	62.6	60.7	55.7	56.0	48.6	49.8	55.0
27	46.0	44.0	46.0	49.5	47.0	45.0	43.0	42.0	41.0	45.0
28										
29	153	158	351	591	755	839	895	953	1,044	1,109
30	8,704	8,915	21,465	43,675	52,811	55,654	58,326	60,767	60,182	70,259
31	56.9	56.4	61.2	73.9	69.9	66.3	65.2	63.8	57.6	63.4
32	52.0	49.5	53.0	58.0	54.0	51.0	50.0	50.0	46.0	51.0
33					1					
34					77					
35					77.0					
36					77.0					
37	6	10	18	30	39	44	48	48	52	52
38	342	521	1,071	1,788	3,255	2,704	2,731	2,716	2,882	2,996
39	57.0	52.1	59.5	59.6	83.5	61.5	56.9	56.6	55.4	57.6
40	59.0	54.0	42.0	48.0	56.0	56.0	51.5	52.0	46.0	53.0

	AP	AQ	AR	AS	AT	AU	AV	AW
1								
2	**2021_02**	**2021_03**	**2021_04**	**2021_05**	**2021_06**	**2021_07**	**2021_08**	**2021_09**
3	359,334	360,480	360,331	360,601	361,767	361,652	361,790	362,647
4	13,955,377	13,155,691	14,892,438	14,985,843	16,072,168	16,522,446	16,196,410	15,437,890
5	38.8	36.5	41.3	41.6	44.4	45.7	44.8	42.6
6	33.0	31.0	36.0	35.0	35.0	36.0	34.0	34.0
7	9,161	11,707	9,375	9,289	11,877	9,524	9,475	11,888
8	380,742	668,962	388,153	382,645	725,802	421,333	402,454	731,373
9	41.6	57.1	41.4	41.2	61.1	44.2	42.5	61.5
10	35.0	37.0	34.0	34.0	40.0	35.0	34.0	40.0
11	26,469	26,516	26,549	26,595	26,616	26,759	26,687	26,740
12	932,584	869,580	967,520	954,939	988,924	1,053,598	971,507	976,652
13	35.2	32.8	36.4	35.9	37.2	39.4	36.4	36.5
14	30.0	27.0	31.0	30.0	30.0	32.0	29.0	29.0
15								
16	18,806	18,935	19,151	19,237	19,238	19,157	19,190	19,264
17	870,627	859,759	989,066	897,329	946,324	1,031,202	968,281	1,009,752
18	46.3	45.4	51.6	46.6	49.2	53.8	50.5	52.4
19	38.0	37.0	43.0	38.0	40.0	43.0	39.0	41.0
20	35	50	48	46	59	52	54	69
21	2,103	2,776	3,578	2,437	3,359	2,916	2,669	4,672
22	60.1	55.5	74.5	53.0	56.9	56.1	49.4	67.7
23	44.0	38.5	43.0	38.5	46.0	48.0	44.0	49.0
24	939	945	962	972	989	989	984	978
25	48,028	43,988	49,018	50,922	54,687	55,859	50,318	51,354
26	51.1	46.5	51.0	52.4	55.3	56.5	51.1	52.5
27	39.0	37.0	42.5	40.0	40.0	43.0	39.0	41.0
28								
29	1,124	1,130	1,132	1,160	1,118	1,101	919	840
30	60,947	58,919	67,852	64,469	68,582	75,496	57,710	57,110
31	54.2	52.1	59.9	55.6	61.3	68.6	62.8	68.0
32	44.0	41.0	49.5	44.0	47.0	50.0	46.0	48.0
33	1	1	1		1			
34	37	26	32		50			
35	37.0	26.0	32.0		50.0			
36	37.0	26.0	32.0		50.0			
37	55	54	54	54	51	49	38	36
38	3,879	2,556	2,984	2,662	3,771	4,345	1,859	1,993
39	70.5	47.3	55.3	49.3	73.9	88.7	48.9	55.4
40	46.0	39.0	46.5	39.5	45.0	52.0	41.0	50.5

Witness: Rita A. Black
Date: 11/1/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET III

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-III-3: See Aqua St. 10 at 8. Assuming Aqua's proposed customer assistance program (CAP) is approved in this proceeding, will customers who are enrolled in Helping Hand at the time that a CAP is implemented automatically be enrolled in the CAP? If not, please explain all steps necessary for these customers to enroll in CAP.

RESPONSE:

Assuming Aqua PA's proposal is approved, the outreach plan for launching the program will include offering the program to current Helping Hand participants via a letter that explains the new program and provides information on how to enroll.

Witness: Rita A. Black
Date: 11/1/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET III

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-III-4: Please describe all steps Helping Hand customers would be required to take to enroll in CAP.

RESPONSE:

Helping Hand customers would affirm their interest in participating in CAP through application to the program. Helping Hand customers will apply to the CAP program using the same methods available to all interested customers.

Witness: Rita A. Black
Date: 11/1/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET III

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-III-5: Assuming a CAP is approved in this proceeding, how does Aqua intend to inform customers – including Helping Hands customers – about the availability of a CAP?

RESPONSE:

Aqua PA plans to promote the availability of CAP through various methods including, but not limited to, website information, bill stuffers, direct correspondence to Helping Hand participants, and verbal referrals from contact center agents.

Witness: Rita A. Black
Date: 11/1/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET III

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-III-6: Assuming a CAP is approved in this proceeding, will customers who enroll in Aqua's CAP automatically be enrolled in the Helping Hand arrearage forgiveness program? If the answer is no or in the negative, what additional steps will CAP customers need to take to enroll in the Helping Hand arrearage forgiveness program.

RESPONSE:

The arrearage forgiveness component of the proposed CAP will be available to all customers who enroll in CAP with a pre-program balance.

Witness: Rita A. Black
Date: 11/1/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET III

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-III-7: See Aqua St. 10 at 13. If Aqua chooses to use Dollar Energy Fund to operate as its CAP administrator, does Aqua intend to utilize any cross enrollment features and/or information sharing features offered by DEF? If so, please describe all features the Company intends to utilize and name the utilities with which Aqua intends to coordinate.

RESPONSE:

Dollar Energy Fund, as a CAP administrator of many utility CAP and Hardship Fund programs, provides cross-enrollment features that reduce barriers to enrollment and increase participation in multiple programs through one application. To the extent that Dollar Energy Fund provides administrative services for other utility CAP or Hardship Fund programs in Aqua PA's territory, Aqua PA supports the use of cross-enrollment which typically involves obtaining verbal permission from a customer to use income documentation submitted by that customer to Dollar Energy Fund for the purposes of enrolling in another program Dollar Energy Fund administers. At the time of contract execution with Dollar Energy Fund, Aqua PA plans to inquire as to the availability of cross-enrollment for other utilities within Aqua PA's service territory and would agree to coordinate with any of those identified.

Witness: Olivia J. Hawkins
Date: 11/1/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET III

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-III-12: How many Helping Hand customers were removed from Helping Hand for non-payment from 2018 to present, disaggregated by month, year, and service type? Please provide this data in an Excel spreadsheet.

RESPONSE:

Please see the table below for the summary amount by month and year. Service type was not captured when collecting this data. Please refer to the electronic file Highly Confidential CAUSE-PA-III-12 Attachment 1.xlsx.

Helping Hand Program returned for non-payment													
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Year
2021	*21*	*3*	*2*	*4*	*8*	*8*	152	242	66				**506**
2020	22	13	17	8	*4*	*11*	*68*	*53*	*12*	*17*	*26*	*24*	**275**
2019	37	14	20	10	11	15	13	16	16	15	13	17	**197**
2018	31	28	14	9	18	14	20	15	19	22	20	15	**225**

Non-paying customers were not removed from program during this timeframe due to COVID

Witness: Olivia J. Hawkins
Date: 11/1/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET III

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-III-14: Please provide the number of Helping Hand exits, by reason of exit, by month, year, and service type, from 2018 to present.

RESPONSE:

Please see table below. This information is not available by service type:

Helping Hand Program Exits														
	Reason	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Year
2021	Completed	5	5	4	3	5	1	0	1					**24**
	Returned	21	3	2	4	8	8	152	242	66				**506**
2020	Completed	4	4	4	0	12	72	54	35	14	1	9	12	**221**
	Returned	22	13	17	8	4	11	68	53	12	17	26	24	**275**
2019	Completed	1	1	0	1	1	1	1	0	5	4	5	0	**20**
	Returned	37	14	20	10	11	15	13	16	16	15	13	17	**197**
2018	Completed	0	1	0	0	0	0	0	0	2	0	0	0	**3**
	Returned	31	28	14	9	18	14	20	15	19	22	20	15	**225**
						Completed = Paid in full								
						Returned = Not paid								

Please see responses for CAUSE-PA-III-13 and CAUSE-PA-III-15 for additional information.

Witness: Olivia J. Hawkins
Date: 11/1/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET III

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-III-15: See Response to CAUSE-PA I-21. From 2018 to present, how many of Aqua's customers were/are enrolled in the Helping Hand program, disaggregated by Federal Poverty Level tier (0-50% FPL; 51-100% FPL; 101-150%; and 151-200% FPL FPL)? Please disaggregate by service type and month. Please provide this data in an Excel spreadsheet.

RESPONSE:

Please refer to the electronic file CAUSE-PA-III-15 Attachment 1.xlsx.

			2018_01	2018_02	2018_03	2018_04	2018_05	2018_06	2018_07	2018_08	2018_09	2018_10	2018_11	2018_12	2019_01	2019_02	2019_03	2019_04	2019_05	2019_06	2019_07	2019_08	2019_09	2019_10	2019_11	2019_12	2020_01	2020_02	2020_03	2020_04	2020_05	2020_06	2020_07	2020_08	2020_09	2020_10	2020_11	2020_12	2021_01	2021_02	2021_03	2021_04	2021_05	2021_06	2021_07	2021_08	2021_09
ALL HHT accounts 0 - 50% FPL	Water only	Number of accounts	46	46	36	38	39	38	38	39	40	44	45	43	43	38	36	32	35	38	35	29	29	31	34	34	34	37	34	34	69	166	237	270	276	290	313	329	335	340	344	346	357	338	329	258	254
	Wastewater only	Number of accounts																																										1			
	Both	Number of accounts	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	2	2	2	2	2	2	2	2	2	1	3	5	5	7	8	8	7	9	9	9	9	9	9	10	10	6	6
ALL HHT accounts 51 - 100% FPL	Water only	Number of accounts	92	79	74	72	73	72	78	73	75	78	68	68	69	58	57	56	61	65	63	70	73	72	78	79	81	75	79	71	116	205	265	308	312	336	355	380	391	390	393	416	415	393	383	329	320
	Wastewater only	Number of accounts																																													
	Both	Number of accounts	2	2	2	3	4	4	5	3	3	3	3	3	4	3	2	3	3	3	3	3	3	3	3	3	3	1	1	1	6	6	9	13	13	17	17	16	16	16	15	17	15	13	14	10	10
ALL HHT accounts 101 - 150% FPL	Water only	Number of accounts	50	44	37	38	39	41	43	43	44	44	48	39	42	34	28	30	31	29	28	32	34	38	43	43	46	48	45	42	61	96	121	135	142	155	158	174	171	173	177	186	190	161	163	140	136
	Wastewater only	Number of accounts																			1																			1	1	1	1				
	Both	Number of accounts	2	1	1	1	1	1		1	2	2	2	2	1	1	1	1	2	2	2	1	2	2	3	3	3	4	4	4	5	7	12	11	12	11	10	10	10	12	13	15	15	15	15	10	9
ALL HHT accounts 151 - 200% FPL	Water only	Number of accounts	20	19	18	20	22	21	20	23	24	26	26	27	19	16	15	17	21	23	22	20	20	19	20	20	17	14	13	10	14	26	31	37	37	37	39	33	32	34	30	30	33	31	33	26	23
	Wastewater only	Number of accounts																																													
	Both	Number of accounts	1	1	1	1	1	1	2	2	2	1																			1	2	2	2	1	1	2	2	2	2	2	2	2	1	1	1	1
ALL HHT accounts over 200% FPL	Water only	Number of accounts	2	2	2	2	4	2	3	2	1	1	1	4	2	1	1	1	1	2	2	2	2	1	1	1	1	1	1	1		1	3	5	6	5	7	5	6	5	5	7	11	11	11	10	10
	Wastewater only	Number of accounts																																													
	Both	Number of accounts																														1	2	2	2	2	2	2	2	2	1	1	1	1	1	1	1
HHT accounts reported vs. not reported due to income not on file	Water only	Accounts reported	210	190	167	170	177	174	182	180	184	193	188	181	175	147	137	136	149	157	150	153	158	161	176	177	179	175	172	158	260	494	657	755	773	823	872	921	935	942	949	985	1006	934	919	763	743
		Not reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	17	51	75	85	95	96	106	123	137	143	143	147	155	141	140	109	113
	Wastewater only	Accounts reported																																						1	1	1	1	1			
		Not reported																																						0	0	0	0	0			
	Both	Accounts reported	6	5	5	6	7	7	8	7	8	7	6	6	6	5	4	5	6	6	7	6	7	7	8	8	8	7	7	6	15	21	30	35	36	39	38	39	39	41	40	44	42	40	41	28	27
		Not reported	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	1	4	7	9	10	9	9	8	9	10	10	10	9	8	7	6	5

Witness: Georgetta Parisi-Knup
Date: 11/1/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET III

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-III-20: See Response to CAUSE-PA-II-9. Does Aqua currently provide any interpretation or translation services to its customers with limited English proficiency, other than Spanish? Please specifically explain what interpretation or translation services are provided and the language in which they are provided.

RESPONSE:

The Company's translation services are Spanish only.

Witness: Georgetta Parisi-Knup
Date: 11/1/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

COALITION FOR AFFORDABLE UTILITY SERVICE AND ENERGY EFFICIENCY IN PENNSYLVANIA

DATA REQUEST SET III

DOCKET NOS. R-2021-3027385 & R-2021-3027386

CAUSE-PA-III-22: Please provide a copy of any document, internal memorandum, report, or analysis which discusses or analyzes:

a. The impact of COVID-19 on residential customers and/or low income customers arrearage amounts;
b. The impact of COVID-19 on residential customers and/or low income customers usage levels;
c. The impact of COVID-19 on residential customers and/or low income customers bill affordability.

RESPONSE:

(a) Please see attachment CAUSE-PA-III-22 Attachment 1.pdf for copies of the reports required by the Commission's COVID-19 Orders relating to at risk accounts.

(b)-(c) The Company does not have any reports.

Via Electronic Filing

October 15, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

Re: **Public Utility Service Termination Moratorium – March 18, 2021 Order - Reporting Requirements**
PUC Docket No: M-2020-3019244

Dear Secretary Chiavetta:

Enclosed please find Aqua Pennsylvania, Inc.'s information required in the Commission's March 18, 2021 Order in the above docket.

Sincerely,

Mary McFall Hopper

Mary McFall Hopper
Regulatory Counsel
(610) 645-1170
mmhopper@aquaamerica.com

Enclosure

	07 2021	07 2020	07 2019	08 2021	08 2020	08 2019	09 2021	09 2020	09 2019
Residential Accounts At-Risk	52,434	68,185	45,042	48,173	63,498	50,441	46,807	55,311	52,122
Non-Residential Accounts At-Risk	15,288	13,992	12,367	14,630	14,180	13,508	16,341	12,701	14,003
Residential Aggregate Arrears	$14,029,091	$5,603,274	$9,238,219	$13,764,799	$13,173,185	$9,201,219	$13,915,184	$13,720,493	$9,684,840
Residential 30 - 60 Days	$2,748,687	$2,921,268	$2,795,918	$2,720,493	$3,476,604	$2,742,443	$2,876,320	$3,429,675	$3,101,552
Residential 60 - 90 Days	$1,375,902	$1,510,752	$1,069,331	$1,444,618	$1,714,923	$1,268,689	$1,456,870	$1,950,996	$1,229,176
Residential 90+ Days	$9,904,502	$1,171,254	$5,372,970	$9,599,688	$7,981,658	$5,190,087	$9,581,994	$8,339,822	$5,354,112
Residential Disconnects	561			440			538		
Non-Residential Disconnects	25			15			14		
Non-Residential Aggregate Arrears	$3,108,697	$1,994,876	$1,465,838	$3,062,141	$2,794,901	$1,334,616	$3,274,306	$2,708,580	$1,603,606
Non-Residential 30 - 60 Days	$1,273,010	$1,359,447	$1,001,828	$1,093,358	$1,248,660	$807,593	$1,387,887	$1,098,094	$1,130,181
Non-Residential 60 - 90 Days	$367,035	$316,794	$153,638	$464,129	$390,899	$231,381	$354,963	$442,717	$220,498
Non-Residential 90+ Days	$1,468,652	$318,635	$310,372	$1,504,654	$1,155,342	$295,642	$1,531,456	$1,167,769	$252,927
Residential Disconnects - Dollar Amount	$282,596			$148,900			$305,331		
Non-Residential Disconnects - Dollar Amount	$26,025			$3,802			$1,671		

Via Electronic Filing

February 15, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

Re: **Public Utility Service Termination Moratorium – Modification of March 13th Emergency Order Reporting Requirements**
PUC Docket No: M-2020-3019244

Dear Secretary Chiavetta:

Enclosed please find Aqua Pennsylvania, Inc.'s information required in the Commission's October 13, 2020 Order in the above docket.

Sincerely,

Mary McFall Hopper

Mary McFall Hopper
Regulatory Counsel
(610) 608-8007 (c)
mmhopper@aquaamerica.com

Enclosure

Docket No. M-2020-3019244- Temporary Reporting Requirements: At-Risk Accounts Aqua Pennsylvania, Inc.

Jan-20

Customer Class	Count	Total
Non Residential	4,334	$1,203,432.09
Residential	51,403	$2,755,050.07

Jan-21

Customer Class	Count	Total
Non Residential	12,801	$2,413,635.03
Residential	53,201	$3,436,252.63

January 2021 - Disconnections by Customer Group

Row Labels	Count of Prem Code	
Non Residential	26	$11,128.23
Residential	183	$116,196.66

Via Electronic Filing

July 15, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

Re: **Public Utility Service Termination Moratorium – March 18, 2021 Order - Reporting Requirements**
PUC Docket No: M-2020-3019244

Dear Secretary Chiavetta:

Enclosed please find Aqua Pennsylvania, Inc.'s information required in the Commission's March 18, 2021 Order in the above docket.

Sincerely,

Mary McFall Hopper

Mary McFall Hopper
Regulatory Counsel
(610) 645-1170
mmhopper@aquaamerica.com

Enclosure

Aqua Pennsylvania - Docket No. M-2020-3019244

	04 2021	04 2020	04 2019	05 2021	05 2020	05 2019	06 2021	06 2020	06 2019
Residential Accounts At-Risk	49,237	52,011	31,338	49,767	54,770	33,276	51,874	61,888	47,331
Non-Residential Accounts At-Risk	13,415	12,789	10,935	14,347	13,099	10,850	15,664	13,185	13,742
Residential Aggregate Arrears	$15,425,505	$11,030,304	$9,133,916	$14,644,963	$11,480,163	$8,970,778	$14,501,191	$11,787,272	$8,946,790
Residential 30 - 60 Days	$2,559,879	$2,784,565	$2,509,331	$2,860,135	$2,912,275	$2,424,526	$2,734,834	$2,879,551	$2,423,396
Residential 60 - 90 Days	$1,527,740	$1,694,530	$1,285,187	$1,308,292	$1,579,122	$1,131,550	$1,548,232	$1,629,659	$1,111,053
Residential 90+ Days	$11,337,886	$6,551,209	$5,339,398	$10,476,536	$6,988,766	$5,414,702	$10,218,125	$7,278,062	$5,412,341
Residential Disconnects	483			733			459		
Non-Residential Disconnects	44			35			40		
Non-Residential Aggregate Arrears	$2,664,616	$2,407,090	$1,464,409	$2,913,299	$2,359,390	$1,132,471	$3,009,287	$2,709,045	$948,536
Non-Residential 30 - 60 Days	$786,902	$1,375,065	$937,159	$1,024,333	$1,015,939	$545,740	$1,102,461	$1,028,616	$491,186
Non-Residential 60 - 90 Days	$434,721	$485,979	$200,878	$440,670	$549,896	$251,893	$444,524	$587,732	$178,234
Non-Residential 90+ Days	$1,442,993	$546,046	$326,372	$1,448,296	$793,555	$334,838	$1,462,302	$1,092,697	$279,116
Residential Disconnects - Dollar Amount	$197,031			$462,450			$76,810		
Non-Residential Disconnects - Dollar Amount	$42,414			$54,299			$16,216		

Via Electronic Filing

January 15, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

Re: **Public Utility Service Termination Moratorium – Modification of March 13th Emergency Order Reporting Requirements**
PUC Docket No: M-2020-3019244

Dear Secretary Chiavetta:

Enclosed please find Aqua Pennsylvania, Inc.'s information required in the Commission's October 13, 2020 Order in the above docket.

Sincerely,

Mary McFall Hopper
Regulatory Counsel
(610) 608-8007 (c)
mmhopper@aquaamerica.com

Enclosure

Docket No. M-2020-3019244- Temporary Reporting Requirements: At-Risk Accounts
Aqua Pennsylvania, Inc.

Dec-19

Customer Class	Count	Total
Non Residential	3,562	$2,050,316.00
Residential	52,994	$1,409,083.16

Dec-20

Customer Class	Count	Total
Non Residential	4,860	$3,389,683.68
Residential	55,385	$14,337,865.60

December 2020 - Disconnections by Customer Group

Row Labels	Count of Prem Code	
Non Residential	5	$1,348.21
Residential	320	$6,898.86

Via Electronic Filing

March 15, 2021

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

Re: **Public Utility Service Termination Moratorium – Modification of March 13th Emergency Order Reporting Requirements**
PUC Docket No: M-2020-3019244

Dear Secretary Chiavetta:

Enclosed please find Aqua Pennsylvania, Inc.'s information required in the Commission's October 13, 2020 Order in the above docket.

Sincerely,

Mary McFall Hopper

Mary McFall Hopper
Regulatory Counsel
(610) 608-8007 (c)
mmhopper@aquaamerica.com

Enclosure

Docket No. M-2020-3019244 – Temporary Reporting Requirements: At – Risk Accounts Pennsylvania, Inc.

Feb-20

Customer Class	Count	Total
Non Residential	3,249	$796,807.78
Residential	51,926	$2,952,370.65

Feb-21

Customer Class	Count	Total
Non Residential	4,528	$1,603,098.00
Residential	53,671	$3,865,561.59

February 2021 - Disconnections by Customer Group

Row Labels	Count of Prem Code	
Non Residential	0	$0.00
Residential	2	$3,832.56

Via Electronic Filing

December 15, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

Re: **Public Utility Service Termination Moratorium – Modification of March 13th Emergency Order Reporting Requirements**
PUC Docket No: M-2020-3019244

Dear Secretary Chiavetta:

Enclosed please find Aqua Pennsylvania, Inc.'s information required in the Commission's October 13, 2020 Order in the above docket.

Sincerely,

Mary McFall Hopper

Mary McFall Hopper
Regulatory Counsel
(610) 608-8007 (c)
mmhopper@aquaamerica.com

Enclosure

Nov-19

Customer Class	Count	Total
Non Residential	1,946	$2,050,316.00
Residential	28,320	$7,656,279.00

Nov-20

Customer Class	Count	Total
Non Residential	1,766	$2,536,741.00
Residential	119,678	$5,015,667.00

November 2020 - Disconnections by Customer Group

Row Labels	Count of Prem Code	
Non Residential	19	$32,430.86
Residential	405	$200,671.60

Via Electronic Filing

October 15, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

Re: **Temporary Reporting Requirements: At-Risk Accounts**
PUC Docket No: M-2020-3019244

Dear Secretary Chiavetta:

Enclosed please find Aqua Pennsylvania, Inc.'s information required in the Commission's October 1, 2020 Secretarial Letter in the above docket.

Sincerely,

Mary McFall Hopper

Mary McFall Hopper
Regulatory Counsel
(610) 608-8007 (c)
mmhopper@aquaamerica.com

Enclosure

Aqua Pennsylvania, Inc.

Temporary Reporting Requirements: At-Risk Accounts

Docket No: M-2020-3019244

Sep-19

Customer Class	Count	Total
Non-Residential	1,568	$1,220,017.22
Residential	26,601	$3,730,536.19
TOTAL	28,169	$4,950,553.41

Sep-20

Customer Class	Count	Total
Non-Residential	1,638	$1,994,177.41
Residential	28,330	$8,297,381.03
TOTAL	29,968	$10,291,558.44

Witness: Georgetta Parisi
Date: 10/7/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

OFFICE OF CONSUMER ADVOCATE

DATA REQUEST SET II

DOCKET NOS. R-2021-3027385 & R-2021-3027386

OCA-II-3: In an Excel spreadsheet, disaggregating by water, wastewater, and combined water/wastewater service provided, for each Zip Code listed in response to Question 1, provide the following:

a. The number of residential customers;
b. The number of identified low-income customers;
c. The number of participants in Aqua PA's arrearage forgiveness program.

RESPONSE:

Please refer to the electronic file "OCA-II-3 - Attachment 1.xlsx."

A. Residential Customers						B. Identified Low-Income Customers						C. Helping Hand				
Row Labels	Wastewater	Water	Water & Wastewater	Grand Total	Zip Code	Wastewater	Water	Water & Wastewater	Grand Total	Zip Code	Wastewater	Water	Water & Wastewater	Grand Total
15801	27	1	4,296	4,324	15801			116	116	16116		1		1
16116		259		259	16116		20		20	16121		22		22
16121		1,930		1,930	16121		504		504	16137		4		4
16132		177		177	16132		21		21	16146		45		45
16137		1,633		1,633	16137		87		87	16148		8		8
16142		110		110	16142		2		2	16161		2		2
16143		106		106	16143		6		6	16239		1		1
16146		5,244		5,244	16146		1113		1113	16313		1		1
16148		5,346		5,346	16148		268		268	16740		1		1
16150		1		1	16159		44		44	17824		1		1
16156		1		1	16161		54		54	17834		8		8
16159		556		556	16232	6			6	17840		1		1
16161		308		308	16239		24		24	17851		26		26
16232	53			53	16313		32		32	17866		10		10
16239		360		360	16316		16		16	17870		1		1
16313		289		289	16373	12	12	50	74	17872		24		24
16316		997		997	16740		26		26	17921		1		1
16373	73	77	488	638	17007		4		4	17935		2		2
16375	1			1	17325		1	2	3	17936		1		1
16735		3		3	17824		38		38	17985			2	2
16740		397		397	17831		1		1	18103		1		1
17007		324		324	17832		34		34	18222			2	2
17094		50		50	17834		138		138	18350			2	2
17325	1	2	431	434	17840		13		13	18353		1		1
17724		1		1	17851		551		551	18426		1		1
17824		1,240		1,240	17860		1		1	18428		3		3
17831		16		16	17866		426		426	18431		1		1
17832		291		291	17870		49		49	18436		1		1
17834		1,490		1,490	17872		601		601	18458		1		1
17840		130		130	17881		51		51	18472		1		1
17851		3,273		3,273	17888		14		14	18610	2			2
17860		70		70	17920		2		2	18624	1			1
17866		3,290		3,290	17921		16		16	18657			2	2
17870		1,159		1,159	17935		96		96	18660		2		2
17872		3,099		3,099	17936		22		22	18661			2	2
17881		499		499	17943		5		5	18810		5		5
17888		136		136	17945		6		6	18840		8		8
17920		107		107	17985			8	8	19001		7		7
17921		270		270	18058		15		15	19003		5		5
17935		624		624	18064		1		1	19006		4		4
17936		186		186	18103		1		1	19007		25		25
17943		100		100	18104		1		1	19008		5		5
17945		77		77	18202			28	28	19010		2		2
17961		83		83	18222	1	1	84	86	19012		1	10	11
17985	2	4	307	313	18242		14		14	19014		1		1
18014		20		20	18325		1		1	19018		34		34
18058		199		199	18326		18		18	19020		19		19
18064		54		54	18330		3		3	19021		7		7
18074		12		12	18342		12		12	19022		10		10
18103		373		373	18350	1		8	9	19023		86		86
18104		40		40	18353		32		32	19026		25		25
18201			40	40	18411		12		12	19027	1	4	16	21
18202	1	5	2,091	2,097	18414		1		1	19029		6		6
18222	4	614	1,908	2,526	18419		16	2	18	19032		27		27
18235		1		1	18424		13	62	75	19033		6		6
18242		120		120	18426		13		13	19036		17		17
18322		1		1	18428		97	4	101	19038		3		3
18323		1		1	18431		64		64	19040		3		3
18324	1	2		3	18435			38	38	19046		2		2
18325		3		3	18436		7		7	19050		61		61
18326		298		298	18438		2		2	19053		1		1
18330		58		58	18444		19		19	19057		1		1
18342		145		145	18458		17		17	19063		3	4	7
18346	1			1	18464		10		10	19064		5		5
18347	6			6	18472		20		20	19070		6		6
18350	18	3	661	682	18610	49			49	19072		1		1
18353		431	2	433	18612		7		7	19073		3		3
18357		1		1	18618		6		6	19074		4		4
18410		32		32	18624	12			12	19075		4		4
18411		479		479	18631		3		3	19076		3		3
18414		48		48	18643		11		11	19078		8		8
18419		206	138	344	18644		1		1	19079		32		32
18424	2	100	604	706	18655		2		2	19082		132		132
18426	1	689		690	18657			52	52	19083		13		13
18428	3	1,815	823	2,641	18660		7		7	19086		1		1
18431		1,441		1,441	18661	4	2	90	96	19087		2		2
18435		1	2,752	2,753	18702		4		4	19090		6		6
18436		288		288	18707			16	16	19094		7		7
18438		56		56	18708		16		16	19095		1	8	9
18444		256		256	18810		98		98	19117			2	2
18458		103		103	18824		8		8	19301		1		1
18464		369		369	18831		1		1	19312		2		2
18466	1			1	18840		243		243	19320		1		1
18472		327		327	18914		24		24	19333		1		1
18610	614			614	18938			6	6	19335		1	4	5
18612		494		494	19001		225		225	19341		3		3
18615		5		5	19003		112		112	19344		3		3
18618		100		100	19004		57		57	19355		2		2
18622		1		1	19006		76		76	19380		5		5
18624	955			955	19007		510		510	19382		3	4	7
18628		2		2	19008		135		135	19401		1		1
18631		445		445	19009		2		2	19406		5		5
18635		42		42	19010		103		103	19426		1		1
18643		176		176	19012	10	26	244	280	19428		4		4
18644		80		80	19014		23		23	19444		3		3
18655		110		110	19017		2		2	19462		4		4
18657	7	10	694	711	19018		695		695	19464		2		2
18660		59		59	19020		530		530	19607		2		2

18661	553	101	930	1,584
18702		116		116
18707	2		394	396
18708		845		845
18810		1,186		1,186
18813		14		14
18824		61		61
18831		12		12
18840		3,351		3,351
18901		175		175
18914		2,063		2,063
18934		1		1
18938	1	1	426	428
18959		1		1
18966		5		5
19001		5,863		5,863
19002		2		2
19003		4,116		4,116
19004		2,834		2,834
19006		5,896	1	5,897
19007		6,253		6,253
19008		7,247		7,247
19009		247		247
19010		5,386		5,386
19012	151	186	4,054	4,391
19014		874		874
19017		57		57
19018		7,339		7,339
19020		14,002		14,002
19021		3,108		3,108
19022		1,186		1,186
19023		6,715		6,715
19025		2,375		2,375
19026		9,857		9,857
19027	273	1,362	6,805	8,440
19028		80		80
19029		1,554		1,554
19031		2,007		2,007
19032		2,368		2,368
19033		2,693		2,693
19034		674		674
19035		1,450		1,450
19036		4,219		4,219
19037		23		23
19038	157	8,765	3,622	12,544
19040		5,019		5,019
19041		1,512		1,512
19043		982		982
19044		26		26
19046		5,637	20	5,657
19047		6		6
19050		8,507		8,507
19052		57		57
19053		1,843		1,843
19055		14		14
19056		206		206
19057		321		321
19063	31	9,534	3,333	12,898
19064		8,415		8,415
19065		22		22
19066		1,679		1,679
19070		2,415		2,415
19072		2,950		2,950
19073	4	7,011	670	7,685
19074		1,880		1,880
19075		2,730		2,730
19076		1,916		1,916
19078		3,699		3,699
19079		3,066		3,066
19081		2,913		2,913
19082		11,698		11,698
19083		12,247		12,247
19085		2,083		2,083
19086		2,128		2,128
19087		10,250		10,250
19090		5,665		5,665
19094		1,485		1,485
19095	102	212	2,918	3,232
19096		3,941		3,941
19111		3		3
19115		4		4
19116		3		3
19117		8	12	20
19118		30		30
19126			2	2
19128		7		7
19151		7		7
19301		2,455		2,455
19311	654			654
19312		3,739		3,739
19320		1,184		1,184
19328		2		2
19330	280			280
19333		1,667		1,667
19335	2	9,741	688	10,431
19341		5,829		5,829
19342		799		799
19343		480		480
19344		671		671
19348	350	868	98	1,316
19350	660	3		663
19352		84		84
19353		1		1
19355		8,125		8,125
19374	142			142

19021		205		205
19022		190		190
19023		1723		1723
19025		16		16
19026		672		672
19027	19	68	314	401
19028		1		1
19029		111		111
19031		19		19
19032		429		429
19033		95		95
19034		10		10
19035		15		15
19036		375		375
19038	1	276	118	395
19040		143		143
19041		17		17
19043		60		60
19044		1		1
19046		100		100
19050		1226		1226
19052		1		1
19053		82		82
19055		1		1
19056		2		2
19057		33		33
19063	3	136	110	249
19064		136		136
19065		1		1
19066		27		27
19070		115		115
19072		28		28
19073		65	10	75
19074		129		129
19075		47		47
19076		95		95
19078		152		152
19079		727		727
19081		57		57
19082		2312		2312
19083		215		215
19085		16		16
19086		21		21
19087		107		107
19090		266		266
19094		185		185
19095	15	26	134	175
19096		39		39
19117			2	2
19126			2	2
19151		1		1
19301		37		37
19311	3			3
19312		38		38
19320		16		16
19330	2			2
19333		15		15
19335		76	30	106
19341		63		63
19342		5		5
19343		6		6
19344		40		40
19348	1	2	4	7
19355		78		78
19380	16	156	2	174
19381		4		4
19382	19	109	40	168
19390	7			7
19401	14	3		17
19403	14			14
19406		133		133
19425	1	33	4	38
19426		24		24
19428		177		177
19444		39		39
19460		21		21
19462		86		86
19464		28		28
19468	27			27
19473	2	1		3
19492		1		1
19504		4		4
19506	8			8
19525		59		59
19607		23		23
Grand Total	247	19668	1580	21495

Grand Total	4	822	58	884

19380	1,541	13,843	898	16,282
19381	95	127	6	228
19382	2,238	10,328	3,258	15,824
19383		8		8
19390	822			822
19401	2,385	90	8	2,483
19403	2,432			2,432
19406		6,095		6,095
19422		1		1
19425	2	3,637	654	4,293
19426		1,663		1,663
19428		7,019		7,019
19435		15		15
19444		3,458		3,458
19446		331	1	332
19452		1		1
19453		250		250
19460		2,967		2,967
19462		4,326		4,326
19463		1		1
19464	296	1,129		1,425
19465		3		3
19468	4,424			4,424
19473	394	113		507
19479		1		1
19481		211		211
19485		1		1
19492		46		46
19504		93		93
19506	268			268
19508		62		62
19523		1		1
19525		3,017		3,017
19541		64		64
19552		1		1
19567		206		206
19607		1,329		1,329
19642		2		2
19711	1			1
Grand Total	20,031	379,319	44,033	443,383

Witness: Rita F. Black
Date: 10/11/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

OFFICE OF CONSUMER ADVOCATE

DATA REQUEST SET II

DOCKET NOS. R-2021-3027385 & R-2021-3027386

OCA-II-8: In an Excel spreadsheet, disaggregating by water, wastewater, and combined water/wastewater service provided, for residential customers as a whole, for each month January 2019 to present inclusive, please provide the following:

a. The number of accounts receiving a notice of disconnection for nonpayment;

b. The number of accounts actually being disconnected for nonpayment;

c. The number of accounts entering into a deferred payment arrangement;

d. The total number of bills issued;

e. The total dollars billed for current service (i.e., not including arrears);

f. The total number of payments received; and

g. The total dollars of payments received.

RESPONSE:

a. Please refer to the electronic file "OCA-II-8 - Attachment 1."

b. Please refer to the electronic file "OCA-II-8 - Attachment 1."

c. Please see the Company's response to OCA-I-10 and "OCA-1-10 - Attachment 1" given in response to OCA-I-10.

d. - g. Please refer to the electronic file "OCA-II-8 - Attachment 1."

Disconnection Notices (All Customer Classes)

	Water	Water & Wastewater	Wastewater
Jan-19	18,076	1,287	514
Feb-19	15,059	1,197	184
Mar-19	13,834	1,172	199
Apr-19	13,515	1,051	370
May-19	14,374	1,113	181
Jun-19	13,965	1,132	166
Jul-19	17,225	1,399	409
Aug-19	16,164	1,502	193
Sep-19	17,718	1,494	186
Oct-19	18,609	1,534	435
Nov-19	14,648	1,325	196
Dec-19	17,481	1,444	182
Jan-20	16,968	1,410	407
Feb-20	16,198	1,504	202
Mar-20	16,184	1,752	281
Apr-20	23,527	2,361	528
May-20	22,121	2,352	356
Jun-20	22,901	2,319	356
Jul-20	23,884	2,298	435
Aug-20	23,233	2,426	388
Sep-20	23,785	2,202	508
Oct-20	23,289	2,222	622
Nov-20	17,387	1,854	378
Dec-20	12,495	1,506	357
Jan-21	14,474	1,848	720
Feb-21	7,739	737	509
Mar-21	11,322	1,301	590,739
Apr-21	1,367	1,444	444
May-21	14,521	1,401	307
Jun-21	13,642	1,443	764
Jul-21	17,078	1,607	304

	Wastewater			Wastewater Total	Water			Water Total
	Reconnection	Shut off Municipal Sewer	Shut off NonPayment		Reconnection	Shut off Municipal Sewer	Shut off NonPayment	
2019	**10**	**9**	**21**	**40**	**4873**	**139**	**7628**	**12640**
Jan		1	2	3	91	8	269	368
Feb		1		1	124	1	260	385
Mar		2	1	3	85	8	172	265
Apr	2		3	5	526	27	1038	1591
May		1	1	2	656	23	815	1494
Jun	1		2	3	512	11	763	1286
Jul	1		2	3	364	9	680	1053
Aug	3	3	2	8	615	7	878	1500
Sep	1		2	3	584	27	920	1531
Oct			2	2	668	8	918	1594
Nov	2	1	4	7	545	10	718	1273
Dec					103		197	300
2020	**2**		**9**	**11**	**704**	**24**	**1322**	**2050**
Jan	1		4	5	121	23	261	405
Feb					121		260	381
Mar			2	2	57	1	98	156
Apr					1			1
May					1			1
Jun					1			1
Nov					161		434	595
Dec	1		3	4	241		269	510
2021 YTD	**2**		**163**	**165**	**3396**	**7**	**4981**	**8384**
Jan			13	13	98		176	274
Feb					2			2
Mar	1		43	44	28		92	120
Apr			20	20	432		747	1179
May	1		27	28	410	5	725	1140
Jun			25	25	589	1	874	1464
Jul			24	24	610	1	789	1400
Aug			1	1	863		1141	2004
Sep			10	10	364		437	801
Grand Total	14	9	193	216	8973	170	13931	23074

		MONTH >>	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19
Pennsylvania, residential, all incomes	Water only	Total payment amount	23,108,071.24	20,446,545.64	20,789,346.50	21,426,574.76	20,739,286.73	19,386,074.66	25,852,646.43	23,546,595.63	24,350,105.91	26,530,802.13	20,670,565.68	25,092,471.47
		Number of payments	348,256	296,966	320,484	345,234	321,409	287,924	353,459	308,407	312,432	348,856	275,069	350,590
	Sewer only	Total payment amount	643,206.57	320,596.18	399,831.94	563,590.05	413,747.07	308,700.53	675,062.64	400,529.30	508,327.94	614,975.94	357,444.42	488,415.32
		Number of payments	8,792	4,810	6,810	8,159	6,965	4,886	9,165	5,471	6,952	8,579	4,740	7,067
	Water & Sewer	Total payment amount	2,338,937.09	2,021,064.40	2,250,109.96	2,215,624.03	2,158,558.46	1,959,140.64	2,629,599.84	2,489,158.29	2,581,412.16	2,768,467.38	2,240,102.29	2,751,008.95
		Number of payments	30,157	25,874	27,866	29,166	28,000	25,005	29,859	27,056	27,438	29,056	24,815	30,510

		MONTH	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19
Pennsylvania, residential, ALL incomes	Water only	Total billed charges	22,647,770.35	20,214,400.68	19,681,216.05	20,276,472.18	21,633,640.85	23,741,607.32	24,515,520.38	25,680,143.64	24,137,876.74	24,906,940.30	21,893,275.03	23,278,208.71
		Number of bills	354,922	339,401	355,092	351,788	355,671	355,058	355,709	355,496	340,126	355,813	330,996	350,900
	Sewer only	Total billed charges	353,593.47	356,772.04	584,650.14	365,010.12	369,922.37	652,041.31	408,672.80	415,293.90	706,121.76	402,163.41	416,054.53	516,118.77
		Number of bills	6,893	6,955	8,507	7,151	7,063	8,602	7,073	7,100	8,642	7,022	7,090	7,821
	Water & Sewer	Total billed charges	2,347,960.21	2,154,109.13	2,088,575.58	2,139,164.65	2,206,747.80	2,458,783.42	2,665,161.84	2,622,128.05	2,562,659.55	2,649,063.44	2,278,870.86	2,634,631.73
		Number of bills	30,433	29,660	30,472	30,543	30,138	31,628	30,489	30,068	29,364	30,142	28,613	30,142

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20
	24,636,439.81	21,049,971.06	23,773,752.29	22,917,706.68	23,280,693.38	26,074,552.48	28,031,966.16	27,628,886.02	25,641,506.90	24,304,880.08	25,212,833.92	23,884,019.02
	340,335	294,676	349,811	323,401	305,897	336,612	324,874	313,061	323,261	319,535	314,566	314,174
Pennsylvania, residential, all incomes	568,578.38	490,508.30	520,998.12	571,880.59	468,297.47	486,768.22	630,639.18	635,963.92	767,862.63	610,984.69	527,954.04	724,355.15
	7,141	7,004	7,524	7,743	6,931	7,186	8,025	10,355	11,332	10,011	7,944	10,768
	2,548,381.85	2,468,274.46	2,963,951.89	2,796,029.53	2,814,787.01	2,991,415.31	3,096,477.78	3,119,268.18	2,867,763.01	2,880,599.87	2,996,611.98	2,902,426.10
	28,198	26,539	30,205	28,613	27,094	28,943	28,304	28,224	27,369	28,966	28,431	27,566

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20
	24,517,672.94	22,443,995.05	22,160,247.25	24,479,885.62	24,746,071.77	26,680,876.70	29,485,118.49	27,645,966.66	23,766,000.54	25,541,734.92	22,926,743.27	25,613,245.41
	355,928	350,228	356,780	356,742	356,225	357,611	357,523	357,552	358,016	354,485	336,281	358,466
Pennsylvania, residential, ALL incomes	650,756.92	416,221.66	683,632.12	486,721.87	413,525.35	701,935.96	520,028.20	691,411.94	796,613.60	585,569.73	587,550.86	912,276.75
	7,974	7,100	8,735	7,910	7,163	8,733	7,987	12,256	13,153	10,983	10,732	13,186
	2,661,421.72	2,747,414.40	2,855,734.48	2,975,509.23	2,863,062.25	3,187,051.52	3,265,869.02	3,140,444.28	2,752,348.57	3,016,324.68	2,766,242.10	3,130,268.16
	30,490	29,817	30,733	30,774	30,025	30,804	30,825	30,768	30,781	30,809	29,314	30,835

	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21
Pennsylvania, residential, all incomes	23,846,088.22	23,118,565.59	29,663,086.47	22,384,598.06	23,720,789.12	27,950,997.04	26,332,370.96	28,777,776.48
	311,080	300,287	392,359	300,613	307,481	350,587	318,498	347,511
	880,416.51	678,972.68	830,822.68	1,129,841.50	715,189.45	782,726.46	1,128,592.11	789,157.81
	12,585	10,640	12,439	12,151	11,551	11,699	12,155	11,547
	2,867,084.17	2,869,567.75	3,578,771.90	2,823,112.21	2,858,127.40	3,292,872.36	3,053,223.80	3,305,393.21
	27,635	27,044	33,501	27,113	26,937	30,840	27,798	30,492

	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21
Pennsylvania, residential, ALL incomes	26,372,366.18	22,632,741.70	24,390,898.83	25,479,930.63	25,029,774.67	27,322,117.86	27,584,186.67	27,199,694.07
	358,214	338,941	359,898	359,834	353,445	360,883	360,755	361,168
	835,606.35	504,206.81	940,324.25	1,179,296.30	676,141.87	1,204,923.48	823,196.13	680,781.79
	12,306	7,956	13,081	14,114	12,253	14,302	13,143	12,456
	3,153,150.63	2,799,390.03	3,114,223.93	3,100,209.10	2,962,889.84	3,245,407.42	3,250,800.73	3,091,793.92
	30,863	29,374	30,998	31,048	30,201	31,031	31,223	31,236

Witness: Georgetta Parisi
Date: 10/7/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

OFFICE OF CONSUMER ADVOCATE

DATA REQUEST SET II

DOCKET NOS. R-2021-3027385 & R-2021-3027386

OCA-II-9: In an Excel spreadsheet, disaggregating by water, wastewater, and combined water/wastewater service provided, for identified low-income residential customers as a whole, for each month January 2019 to present inclusive, please provide the following:

a. The number of accounts receiving a notice of disconnection for nonpayment;
b. The number of accounts actually being disconnected for nonpayment;
c. The number of accounts entering into a deferred payment arrangement;
d. The total number of bills issued;
e. The total dollars billed for current service (i.e., not including arrears);
f. The total number of payments received; and
g. The total dollars of payments received.

RESPONSE:

a. See electronic attachment OCA-II-9, worksheet "OCA-II-9A."

b. See electronic attachment for OCA-II-9, worksheet"OCA-II-9B."

c. See response and attachment for OCA-I-10 for payment arrangement information. This information cannot be broken down by income level.

d.-g. See electronic attachment OCA-II-9, worksheets "OCA-II-9DEFG."

		MONTH	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	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21
Pennsylvania, residential, low income	Water only	Total billed charges	1,011,491.54	1,026,362.11	972,922.49	981,153.13	1,020,576.57	1,125,364.66	1,143,514.35	1,242,958.77	1,232,111.69	1,156,294.76	1,213,470.09	1,189,023.00	1,236,272.96	1,212,331.99	1,153,708.17	1,291,448.80	1,282,066.76	1,295,045.17	1,423,435.09	1,350,277.79	1,271,331.06	1,341,008.00	1,353,415.28	1,420,805.25	1,610,211.74	1,395,571.54	1,424,221.54	1,604,978.09	1,448,407.63	1,447,680.18	1,517,389.56	1,452,574.09
		Number of bills	14,309	14,361	14,664	14,777	14,824	14,823	14,955	15,101	15,069	15,410	15,233	15,551	15,752	15,863	16,183	16,245	16,349	16,482	16,651	16,783	16,891	16,981	16,993	18,372	18,675	18,571	18,950	19,166	19,168	19,265	19,177	19,265
	Sewer only	Total billed charges	1,359.80	1,195.07	6,920.21	1,374.34	1,365.21	7,889.52	1,785.16	3,430.74	9,669.22	2,097.07	2,148.69	4,401.47	10,475.51	2,477.32	10,344.16	5,916.10	3,016.90	11,578.68	6,766.62	6,966.11	7,940.28	6,941.72	7,048.10	9,782.60	8,954.96	8,494.10	11,343.70	10,959.48	10,540.25	10,621.11	11,751.35	10,416.27
		Number of bills	18	21	52	25	23	57	27	27	62	29	31	42	64	36	77	72	40	87	79	79	89	79	80	105	101	97	124	122	124	130	138	132
	Water & Sewer	Total billed charges	60,831.44	59,174.23	56,095.46	55,828.55	58,349.42	63,742.63	76,306.34	76,660.75	76,641.27	72,148.40	63,171.54	71,832.05	73,541.34	78,328.70	88,004.21	90,221.89	86,961.48	98,912.34	108,152.98	100,643.27	96,132.35	108,232.93	94,231.91	121,391.21	125,729.51	114,643.94	124,861.50	128,557.06	119,896.19	142,994.22	140,648.33	125,674.54
		Number of bills	663	665	675	686	689	665	691	701	699	708	675	709	691	673	715	727	725	773	800	826	843	860	842	989	1,005	963	1,027	1,051	1,025	1,085	1,085	1,084

		MONTH	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	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21	May-21	Jun-21	Jul-21	Aug-21
Pennsylvania, residential, low income	Water only	Total payment amount	1,091,983.53	1,045,187.72	1,066,678.82	1,072,427.38	1,086,552.20	926,341.88	1,150,286.51	1,136,536.08	1,098,877.29	1,219,121.24	988,743.14	1,154,861.75	1,272,700.68	1,165,815.83	1,098,590.21	1,129,611.98	1,122,293.65	1,178,886.63	1,283,924.35	1,092,216.57	1,061,054.62	1,049,327.68	948,490.79	935,837.49	1,099,880.90	1,076,539.79	1,689,660.08	1,527,504.31	1,725,963.04	1,553,711.07	1,595,546.23	1,611,626.74
		Number of payments	10,439	9,400	10,159	10,422	10,481	8,814	10,747	10,127	9,787	11,031	8,985	10,749	11,551	10,346	10,387	10,432	9,793	10,297	10,566	9,368	9,865	9,689	8,719	9,024	9,768	9,209	13,085	11,394	11,629	12,844	13,255	13,243
	Sewer only	Total payment amount	3,970.43	3,015.04	2,375.12	5,738.64	6,391.34	1,590.12	4,032.95	5,074.94	2,910.18	6,141.33	6,380.53	4,651.19	5,751.52	4,750.90	6,484.00	3,937.73	6,396.84	4,784.33	7,857.70	5,751.06	8,493.49	5,898.94	7,027.90	5,025.07	7,582.60	7,584.70	12,627.74	8,837.29	10,460.54	12,695.15	11,977.30	9,630.37
		Number of payments	26	27	21	37	31	18	28	35	24	36	30	29	38	39	50	31	43	46	51	39	60	47	43	45	55	58	88	68	69	84	92	89
	Water & Sewer	Total payment amount	67,184.15	58,604.00	62,358.48	60,320.03	59,984.09	53,611.87	67,745.23	67,757.05	70,821.74	76,345.55	55,291.31	67,554.73	73,592.91	67,888.03	66,127.92	70,707.05	73,723.36	74,796.38	90,520.28	79,835.96	76,049.29	75,124.35	80,148.94	80,036.52	84,925.26	87,245.81	122,746.40	119,407.72	131,166.97	131,772.98	145,469.01	132,535.42
		Number of payments	519	449	487	503	481	436	508	502	502	556	429	543	554	506	480	490	489	514	550	527	542	564	534	545	575	585	745	708	696	814	843	810

MONTH	2019 01	2019 02	2019 03	2019 04	2019 05	2019 06	2019 07	2019 08	2019 09	2019 10	2019 11	2019 12	2020 01	2020 02	2020 03	2020 04	2020 05	2020 06	2020 07	2020 08	2020 09	2020 10	2020 11	2020 12	2021 01	2021 02	2021 03	2021 04	2021 05	2021 06	2021 07	2021 08	2021 09
WT Only	3,867	3,385	3,222	3,312	3,744	3,407	3,830	3,794	4,010	4,178	3,538	4,131	3,967	3,951	3,923	6,700	5,951	6,068	6,135	5,567	6,149	6,200	635	43	44	24	30	3,594	3,981	2,334	4,989	3,419	4,090
SW Only	29	6	7	26	12	4	27	9	12	34	9	17	29	18	25	47	30	32	35	36	28	34	2	44	16	30	33	23	32				
WT & SW	178	170	129	168	149	180	172	215	175	180	155	187	191	171	221	335	299	291	312	297	326	349	8	1	2	1	4	345	145	171	321	221	246

	Wastewater			Water		
Row Labels	Reconnection	Shut off Municipal Sewer	Shut off NonPayment	Reconnection	Shut off Municipal Sewer	Shut off NonPayment
2019						
Jan				26	2	53
Feb				42	1	51
Mar				20		26
Apr				182	10	260
May		1		265	7	270
Jun				194	4	226
Jul			1	151	2	192
Aug	1	1	1	254	2	282
Sep	1			213	5	268
Oct			1	233	1	288
Nov	1		1	223	5	235
Dec				39		45
2020						
Jan	1		1	58	10	77
Feb				54		71
Mar				18		24
Apr				1		
Nov				17		42
Dec				33		20
2021						
Jan			1	11		13
Feb				1		
Mar			2	4		4
Apr			1	47		50
May			1	192	2	229
Jun			1	251	1	289
Jul			5	232		255
Aug				407		470
Sep			3	201		222
Grand Total	4	2	19	3,369	52	3,962

Witness: Georgetta Parisi-Knup
Date: October 14, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

OFFICE OF CONSUMER ADVOCATE

DATA REQUEST SET II

DOCKET NOS. R-2021-3027385 & R-2021-3027386

OCA-II-21: In an Excel spreadsheet, disaggregating by water, wastewater, and combined water/wastewater service provided, please provide by month for January 2019 to present:

a. The average bill for current service for all residential accounts;
b. The average arrears of residential accounts in arrears;
c. The average bill for current service of residential accounts in arrears;
d. The total dollars of residential arrears;
e. The percentage of total residential billed dollars constituting arrears;
f. The percentage of billed residential accounts having arrears; and
g. The average arrears of all residential accounts disconnected for nonpayment in that month.

RESPONSE:

a. Please see response to OCA-II-23.

(b)-(f) See electronic attachment OCA-II-21 Attachment 1.

OCA-II-21 Attachment 1

All totals as of EOM, for PA RESIDENTIAL accounts only -->	2019_01	2019_02	2019_03	2019_04	2019_05
Number of all PA RES accounts	392,836	376,460	394,607	391,254	394,102
Billed charges for all accounts	$ 25,340,382.41	$ 22,718,547.60	$ 22,347,547.72	$ 22,770,565.96	$ 24,206,479.21
Number of accounts with arrears	51,300.00	48,133.00	47,744.00	49,619.00	47,450.00
Billed charges for accounts with arrears	$ 3,270,932.04	$ 2,871,455.26	$ 2,724,740.68	$ 2,893,760.85	$ 2,838,472.38
a) The average bill for current service for all residential accounts (calculated in spreadsheet)	$ 64.51	$ 60.35	$ 56.63	$ 58.20	$ 61.42
b) The average arrears of residential accounts in arrears (calculated in spreadsheet)	$ 182.70	$ 194.71	$ 195.50	$ 186.59	$ 191.73
c) The average bill for current service of residential accounts in arrears (calculated in spreadsheet)	$ 63.76	$ 59.66	$ 57.07	$ 58.32	$ 59.82
d) The total dollars of residential arrears (from EOM UARAGED)	$ 9,372,667.56	$ 9,371,884.74	$ 9,333,782.25	$ 9,258,282.76	$ 9,097,544.96
Bill ending balance of accounts with arrears	$ 12,949,958.26	$ 12,081,897.36	$ 12,217,895.63	$ 12,280,528.63	$ 11,916,032.02
e) The percentage of total residential billed dollars constituting arrears	74.70%	76.20%	77.70%	76.40%	76.20%
f) The percentage of billed residential accounts having arrears (calculated in spreadsheet)	13%	13%	12%	13%	12%
Number of arrearage accounts disconnected for non-pay	227	187	134	718	501
Total arrearage for disconnected accounts	$ 98,406.27	$ 61,341.58	$ 55,827.55	$ 341,003.23	$ 212,414.28
g) The average arrears of all residential accounts disconnected for nonpayment in that month	$ 433.51	$ 328.03	$ 416.62	$ 474.93	$ 423.98

OCA-II-21 Attachment 1

All totals as of EOM, for PA RESIDENTIAL accounts only -->	2019_06
Number of all PA RES accounts	394,549
Billed charges for all accounts	$ 26,735,675.71
Number of accounts with arrears	46,335.00
Billed charges for accounts with arrears	$ 3,008,709.27
a) The average bill for current service for all residential accounts (calculated in spreadsheet)	$ 67.76
b) The average arrears of residential accounts in arrears (calculated in spreadsheet)	$ 195.40
c) The average bill for current service of residential accounts in arrears (calculated in spreadsheet)	$ 64.93
d) The total dollars of residential arrears (from EOM UARAGED)	$ 9,053,677.34
Bill ending balance of accounts with arrears	$ 11,956,147.12
e) The percentage of total residential billed dollars constituting arrears	74.80%
f) The percentage of billed residential accounts having arrears (calculated in spreadsheet)	12%
Number of arrearage accounts disconnected for non-pay	456
Total arrearage for disconnected accounts	$ 197,832.32
g) The average arrears of all residential accounts disconnected for nonpayment in that month	$ 433.84

OCA-II-21 Attachment 1

All totals as of EOM, for PA RESIDENTIAL accounts only -->	2019_07	2019_08	2019_09	2019_10	2019_11
Number of all PA RES accounts	394,610	394,041	379,550	394,334	367,803
Billed charges for all accounts	$ 27,582,681.82	$ 28,713,900.31	$ 27,403,583.24	$ 27,955,574.98	$ 24,585,668.09
Number of accounts with arrears	46,339.00	48,108.00	48,734.00	47,999.00	50,824.00
Billed charges for accounts with arrears	$ 3,063,809.24	$ 3,364,789.15	$ 3,262,942.24	$ 3,198,646.42	$ 3,376,720.68
a) The average bill for current service for all residential accounts (calculated in spreadsheet)	$ 69.90	$ 72.87	$ 72.20	$ 70.89	$ 66.84
b) The average arrears of residential accounts in arrears (calculated in spreadsheet)	$ 200.73	$ 193.44	$ 200.67	$ 206.05	$ 194.85
c) The average bill for current service of residential accounts in arrears (calculated in spreadsheet)	$ 66.12	$ 69.94	$ 66.95	$ 66.64	$ 66.44
d) The total dollars of residential arrears (from EOM UARAGED)	$ 9,301,855.13	$ 9,305,827.79	$ 9,779,694.38	$ 9,890,241.53	$ 9,903,030.63
Bill ending balance of accounts with arrears	$ 12,337,317.93	$ 12,704,824.86	$ 12,759,621.96	$ 13,301,362.51	$ 13,101,853.04
e) The percentage of total residential billed dollars constituting arrears	75.20%	73.50%	74.40%	76.00%	74.20%
f) The percentage of billed residential accounts having arrears (calculated in spreadsheet)	12%	12%	13%	12%	14%
Number of arrearage accounts disconnected for non-pay	470	529	524	536	437
Total arrearage for disconnected accounts	$ 182,313.24	$ 198,326.85	$ 204,445.51	$ 206,318.83	$ 181,239.90
g) The average arrears of all residential accounts disconnected for nonpayment in that month	$ 387.90	$ 374.91	$ 390.16	$ 384.92	$ 414.74

OCA-II-21 Attachment 1

All totals as of EOM, for PA RESIDENTIAL accounts only -->	2019_12
Number of all PA RES accounts	389,959
Billed charges for all accounts	$ 26,425,226.94
Number of accounts with arrears	51,553.00
Billed charges for accounts with arrears	$ 3,410,388.31
a) The average bill for current service for all residential accounts (calculated in spreadsheet)	$ 67.76
b) The average arrears of residential accounts in arrears (calculated in spreadsheet)	$ 199.39
c) The average bill for current service of residential accounts in arrears (calculated in spreadsheet)	$ 66.15
d) The total dollars of residential arrears (from EOM UARAGED)	$ 10,278,907.76
Bill ending balance of accounts with arrears	$ 13,615,409.29
e) The percentage of total residential billed dollars constituting arrears	75.00%
f) The percentage of billed residential accounts having arrears (calculated in spreadsheet)	13%
Number of arrearage accounts disconnected for non-pay	149
Total arrearage for disconnected accounts	$ 63,960.14
g) The average arrears of all residential accounts disconnected for nonpayment in that month	$ 429.26

OCA-II-21 Attachment 1

All totals as of EOM, for PA RESIDENTIAL accounts only -->	2020_01	2020_02	2020_03	2020_04	2020_05
Number of all PA RES accounts	395,505	388,125	397,438	396,735	394,305
Billed charges for all accounts	$ 27,826,699.80	$ 25,606,351.42	$ 25,698,075.04	$ 27,937,605.70	$ 28,021,405.51
Number of accounts with arrears	47,790.00	48,868.00	49,793.00	50,615.00	45,992.00
Billed charges for accounts with arrears	$ 3,380,893.55	$ 3,163,684.05	$ 3,226,127.56	$ 3,692,120.88	$ 3,211,880.22
a) The average bill for current service for all residential accounts (calculated in spreadsheet)	$ 70.36	$ 65.97	$ 64.66	$ 70.42	$ 71.07
b) The average arrears of residential accounts in arrears (calculated in spreadsheet)	$ 206.00	$ 207.44	$ 215.54	$ 218.94	$ 251.61
c) The average bill for current service of residential accounts in arrears (calculated in spreadsheet)	$ 70.74	$ 64.74	$ 64.79	$ 72.95	$ 69.84
d) The total dollars of residential arrears (from EOM UARAGED)	$ 9,844,966.81	$ 10,137,176.57	$ 10,732,217.59	$ 11,081,536.47	$ 11,571,909.44
Bill ending balance of accounts with arrears	$ 13,586,096.30	$ 13,151,957.99	$ 14,075,556.73	$ 15,015,245.72	$ 14,634,473.04
e) The percentage of total residential billed dollars constituting arrears	75.10%	75.90%	77.10%	75.40%	78.10%
f) The percentage of billed residential accounts having arrears (calculated in spreadsheet)	12%	13%	13%	13%	12%
Number of arrearage accounts disconnected for non-pay	207	184	82	-	-
Total arrearage for disconnected accounts	$ 90,764.09	$ 89,330.65	$ 31,339.72		
g) The average arrears of all residential accounts disconnected for nonpayment in that month	$ 438.47	$ 485.49	$ 382.19		

OCA-II-21 Attachment 1

All totals as of EOM, for PA RESIDENTIAL accounts only -->	2020_06
Number of all PA RES accounts	398,307
Billed charges for all accounts	$ 30,567,913.80
Number of accounts with arrears	46,738.00
Billed charges for accounts with arrears	$ 3,479,915.32
a) The average bill for current service for all residential accounts (calculated in spreadsheet)	$ 76.74
b) The average arrears of residential accounts in arrears (calculated in spreadsheet)	$ 257.37
c) The average bill for current service of residential accounts in arrears (calculated in spreadsheet)	$ 74.46
d) The total dollars of residential arrears (from EOM UARAGED)	$ 12,028,860.39
Bill ending balance of accounts with arrears	$ 15,766,684.83
e) The percentage of total residential billed dollars constituting arrears	77.90%
f) The percentage of billed residential accounts having arrears (calculated in spreadsheet)	12%
Number of arrearage accounts disconnected for non-pay	-
Total arrearage for disconnected accounts	
g) The average arrears of all residential accounts disconnected for nonpayment in that month	

OCA-II-21 Attachment 1

All totals as of EOM, for PA RESIDENTIAL accounts only -->	2020_07	2020_08	2020_09	2020_10	2020_11
Number of all PA RES accounts	397,719	402,111	403,297	397,852	377,474
Billed charges for all accounts	$ 33,269,672.24	$ 31,476,435.40	$ 27,313,106.77	$ 29,142,275.03	$ 26,277,884.08
Number of accounts with arrears	46,952.00	45,341.00	48,438.00	50,179.00	50,037.00
Billed charges for accounts with arrears	$ 3,718,543.25	$ 3,362,791.41	$ 3,219,996.94	$ 3,464,074.25	$ 3,304,468.30
a) The average bill for current service for all residential accounts (calculated in spreadsheet)	$ 83.65	$ 78.28	$ 67.72	$ 73.25	$ 69.62
b) The average arrears of residential accounts in arrears (calculated in spreadsheet)	$ 264.30	$ 265.55	$ 275.79	$ 280.52	$ 291.84
c) The average bill for current service of residential accounts in arrears (calculated in spreadsheet)	$ 79.20	$ 74.17	$ 66.48	$ 69.03	$ 66.04
d) The total dollars of residential arrears (from EOM UARAGED)	$ 12,409,210.07	$ 12,040,188.65	$ 13,358,723.64	$ 14,076,018.17	$ 14,602,713.73
Bill ending balance of accounts with arrears	$ 16,111,760.61	$ 16,270,058.53	$ 17,015,732.47	$ 17,751,639.73	$ 17,999,445.84
e) The percentage of total residential billed dollars constituting arrears	76.90%	79.30%	81.10%	80.50%	81.60%
f) The percentage of billed residential accounts having arrears (calculated in spreadsheet)	12%	11%	12%	13%	13%
Number of arrearage accounts disconnected for non-pay	-	-	-	-	405
Total arrearage for disconnected accounts					$ 145,354.38
g) The average arrears of all residential accounts disconnected for nonpayment in that month					$ 358.90

OCA-II-21 Attachment 1

All totals as of EOM, for PA RESIDENTIAL accounts only -->	2020_12
Number of all PA RES accounts	403,866
Billed charges for all accounts	$ 29,653,245.86
Number of accounts with arrears	50,550.00
Billed charges for accounts with arrears	$ 3,618,995.96
a) The average bill for current service for all residential accounts (calculated in spreadsheet)	$ 73.42
b) The average arrears of residential accounts in arrears (calculated in spreadsheet)	$ 298.07
c) The average bill for current service of residential accounts in arrears (calculated in spreadsheet)	$ 71.59
d) The total dollars of residential arrears (from EOM UARAGED)	$ 15,067,197.48
Bill ending balance of accounts with arrears	$ 18,991,221.63
e) The percentage of total residential billed dollars constituting arrears	80.90%
f) The percentage of billed residential accounts having arrears (calculated in spreadsheet)	13%
Number of arrearage accounts disconnected for non-pay	258
Total arrearage for disconnected accounts	$ 125,814.24
g) The average arrears of all residential accounts disconnected for nonpayment in that month	$ 487.65

OCA-II-21 Attachment 1

All totals as of EOM, for PA RESIDENTIAL accounts only -->	2021_01	2021_02	2021_03	2021_04	2021_05
Number of all PA RES accounts	402,461	377,338	405,172	406,353	397,174
Billed charges for all accounts	$ 30,343,081.93	$ 25,934,308.63	$ 28,441,497.89	$ 29,750,996.02	$ 28,665,635.46
Number of accounts with arrears	53,820.00	53,629.00	48,359.00	49,635.00	45,440.00
Billed charges for accounts with arrears	$ 3,946,391.69	$ 3,421,927.12	$ 3,338,875.89	$ 3,721,437.05	$ 3,022,095.62
a) The average bill for current service for all residential accounts (calculated in spreadsheet)	$ 75.39	$ 68.73	$ 70.20	$ 73.21	$ 72.17
b) The average arrears of residential accounts in arrears (calculated in spreadsheet)	$ 296.82	$ 319.79	$ 337.72	$ 319.35	$ 346.95
c) The average bill for current service of residential accounts in arrears (calculated in spreadsheet)	$ 73.33	$ 63.81	$ 69.04	$ 74.98	$ 66.51
d) The total dollars of residential arrears (from EOM UARAGED)	$ 15,975,079.89	$ 17,150,265.26	$ 16,331,770.31	$ 15,850,697.03	$ 15,765,499.07
Bill ending balance of accounts with arrears	$ 19,718,589.65	$ 19,894,104.74	$ 20,208,834.41	$ 19,493,308.18	$ 18,406,255.64
e) The percentage of total residential billed dollars constituting arrears	80.00%	82.80%	83.50%	80.90%	83.60%
f) The percentage of billed residential accounts having arrears (calculated in spreadsheet)	13%	14%	12%	12%	11%
Number of arrearage accounts disconnected for non-pay	124	-	92	470	513
Total arrearage for disconnected accounts	$ 42,281.82		$ 37,835.43	$ 173,017.32	$ 470,414.25
g) The average arrears of all residential accounts disconnected for nonpayment in that month	$ 340.98		$ 411.25	$ 368.12	$ 916.99

OCA-II-21 Attachment 1

All totals as of EOM, for PA RESIDENTIAL accounts only -->	2021_06
Number of all PA RES accounts	407,826
Billed charges for all accounts	$ 31,765,004.22
Number of accounts with arrears	46,862.00
Billed charges for accounts with arrears	$ 3,421,144.48
a) The average bill for current service for all residential accounts (calculated in spreadsheet)	$ 77.89
b) The average arrears of residential accounts in arrears (calculated in spreadsheet)	$ 335.94
c) The average bill for current service of residential accounts in arrears (calculated in spreadsheet)	$ 73.00
d) The total dollars of residential arrears (from EOM UARAGED)	$ 15,742,810.13
Bill ending balance of accounts with arrears	$ 19,122,749.02
e) The percentage of total residential billed dollars constituting arrears	82.10%
f) The percentage of billed residential accounts having arrears (calculated in spreadsheet)	12%
Number of arrearage accounts disconnected for non-pay	591
Total arrearage for disconnected accounts	$ 405,147.57
g) The average arrears of all residential accounts disconnected for nonpayment in that month	$ 685.53

OCA-II-21 Attachment 1

All totals as of EOM, for PA RESIDENTIAL accounts only -->	2021_07	2021_08	2021_09
Number of all PA RES accounts	406,908	406,232	408,018
Billed charges for all accounts	$ 31,649,350.30	$ 30,949,730.25	$ 30,114,857.03
Number of accounts with arrears	44,756.00	44,386.00	44,896.00
Billed charges for accounts with arrears	$ 3,271,956.99	$ 3,081,451.35	$ 3,203,879.53
a) The average bill for current service for all residential accounts (calculated in spreadsheet)	$ 77.78	$ 76.19	$ 73.81
b) The average arrears of residential accounts in arrears (calculated in spreadsheet)	$ 334.62	$ 338.43	$ 330.51
c) The average bill for current service of residential accounts in arrears (calculated in spreadsheet)	$ 73.11	$ 69.42	$ 71.36
d) The total dollars of residential arrears (from EOM UARAGED)	$ 14,976,358.72	$ 15,021,593.69	$ 14,838,749.87
Bill ending balance of accounts with arrears	$ 18,143,240.75	$ 18,035,461.47	$ 18,133,836.95
e) The percentage of total residential billed dollars constituting arrears	82.00%	82.90%	82.30%
f) The percentage of billed residential accounts having arrears (calculated in spreadsheet)	11%	11%	11%
Number of arrearage accounts disconnected for non-pay	446	673	440
Total arrearage for disconnected accounts	$ 299,052.55	$ 550,986.31	$ 347,271.95
g) The average arrears of all residential accounts disconnected for nonpayment in that month	$ 670.52	$ 818.70	$ 789.25

Witness: Georgetta Parisi-Knup
Date: 10/14/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

OFFICE OF CONSUMER ADVOCATE

DATA REQUEST SET II

DOCKET NOS. R-2021-3027385 & R-2021-3027386

OCA-II-22: In an Excel spreadsheet, disaggregating by water, wastewater, and combined water/wastewater service provided, please provide by month for January 2019 to present:

a. The average bill for current service for all identified low-income residential accounts;

b. The average arrears of identified low-income residential accounts in arrears;

c. The average bill for current service of identified low-income residential accounts in arrears;

d. The total dollars of identified low-income residential arrears;

e. The percentage of total identified low-income residential billed dollars constituting arrears;

f. The percentage of billed identified low-income residential accounts having arrears; and

g. The average arrears of all identified low-income residential accounts disconnected for nonpayment in that month.

RESPONSE: See electronic attachment OCA-II-22 Attachment 1.

All totals as of EOM, for PA RESIDENTIAL, LOW INCOME accounts only -->	2019_01	2019_02	2019_03	2019_04	2019_05	2019_06
Number of all low income accounts	14,991	15,057	15,399	15,499	15,548	15,546
Billed charges for all low income accounts	$ 1,073,265.27	$ 1,086,257.72	$ 1,035,208.09	$ 1,037,613.81	$ 1,079,356.34	$ 1,196,213.68
Number of low income accounts with arrears	11,688.00	11,509.00	11,376.00	11,435.00	11,339.00	11,538.00
Billed charges for low income accounts with arrears	$ 798,756.99	$ 793,986.23	$ 740,801.98	$ 742,886.24	$ 754,772.74	$ 843,908.96
a) The average bill for current service for all identified low-income residential accounts	$ 71.59	$ 72.14	$ 67.23	$ 66.95	$ 69.42	$ 76.95
b) The average arrears of identified low-income residential accounts in arrears	$ 456.05	$ 465.73	$ 469.07	$ 465.13	$ 464.12	$ 458.97
c) The average bill for current service of identified low-income residential accounts in arre	$ 68.34	$ 68.99	$ 65.12	$ 64.97	$ 66.56	$ 73.14
d) The total dollars of identified low-income residential arrears	$ 5,330,266.46	$ 5,360,070.51	$ 5,336,121.66	$ 5,318,765.29	$ 5,262,667.20	$ 5,295,639.31
Bill ending balance of low income accounts with arrears	$ 6,269,294.91	$ 6,124,927.83	$ 6,170,243.88	$ 6,165,905.41	$ 6,031,912.44	$ 6,093,825.05
e) The percentage of total identified low-income residential billed dollars constituting arre	87.30%	87.00%	88.00%	88.00%	87.50%	86.20%
f) The percentage of billed identified low-income residential accounts having arrears	78.00%	76.40%	73.90%	73.80%	72.90%	74.20%
Number of low income arrearage accounts disconnected for non-pay	106	81	51	337	254	232
Total arrearage for low income disconnected accounts	$ 73,856.09	$ 41,062.70	$ 34,226.20	$ 209,876.47	$ 167,036.99	$ 156,415.77
g) The average arrears of all identified low-income residential accounts disconnected for r	$ 696.76	$ 506.95	$ 671.10	$ 622.78	$ 657.63	$ 674.21

All totals as of EOM, for PA RESIDENTIAL, LOW INCOME accounts only -->	2019_07	2019_08	2019_09	2019_10	2019_11	2019_12
Number of all low income accounts	15,677	15,835	15,841	16,157	15,956	16,312
Billed charges for all low income accounts	$ 1,220,985.66	$ 1,322,664.66	$ 1,318,153.90	$ 1,230,415.72	$ 1,278,696.59	$ 1,265,130.68
Number of low income accounts with arrears	11,574.00	11,626.00	11,870.00	11,954.00	12,373.00	12,411.00
Billed charges for low income accounts with arrears	$ 855,209.78	$ 930,904.89	$ 938,274.81	$ 875,240.12	$ 950,899.36	$ 926,300.97
a) The average bill for current service for all identified low-income residential accounts	$ 77.88	$ 83.53	$ 83.21	$ 76.15	$ 80.14	$ 77.56
b) The average arrears of identified low-income residential accounts in arrears	$ 464.12	$ 464.81	$ 468.55	$ 475.03	$ 467.94	$ 479.02
c) The average bill for current service of identified low-income residential accounts in arre	$ 73.89	$ 80.07	$ 79.05	$ 73.22	$ 76.85	$ 74.64
d) The total dollars of identified low-income residential arrears	$ 5,371,703.45	$ 5,403,861.15	$ 5,561,721.63	$ 5,678,486.64	$ 5,789,804.45	$ 5,945,068.45
Bill ending balance of low income accounts with arrears	$ 6,226,825.27	$ 6,333,047.40	$ 6,419,607.93	$ 6,694,726.75	$ 6,619,911.38	$ 6,865,622.46
e) The percentage of total identified low-income residential billed dollars constituting arre	86.30%	85.30%	85.40%	86.90%	85.60%	86.50%
f) The percentage of billed identified low-income residential accounts having arrears	73.80%	73.40%	74.90%	74.00%	77.50%	76.10%
Number of low income arrearage accounts disconnected for non-pay	228	277	252	269	252	67
Total arrearage for low income disconnected accounts	$ 124,522.77	$ 146,104.34	$ 141,195.91	$ 149,773.79	$ 149,910.86	$ 45,528.20
g) The average arrears of all identified low-income residential accounts disconnected for r	$ 546.15	$ 527.45	$ 560.30	$ 556.78	$ 594.88	$ 679.53

All totals as of EOM, for PA RESIDENTIAL, LOW INCOME accounts only -->	2020_01	2020_02	2020_03	2020_04	2020_05	2020_06
Number of all low income accounts	16,515	16,580	16,982	17,051	17,126	17,346
Billed charges for all low income accounts	$ 1,320,043.09	$ 1,293,056.10	$ 1,251,852.56	$ 1,384,360.03	$ 1,371,868.00	$ 1,405,358.21
Number of low income accounts with arrears	12,278.00	12,293.00	12,488.00	12,291.00	11,785.00	11,834.00
Billed charges for low income accounts with arrears	$ 951,392.71	$ 914,869.12	$ 896,919.12	$ 985,993.61	$ 936,725.92	$ 954,065.60
a) The average bill for current service for all identified low-income residential accounts	$ 79.93	$ 77.99	$ 73.72	$ 81.19	$ 80.10	$ 81.02
b) The average arrears of identified low-income residential accounts in arrears	$ 482.38	$ 495.16	$ 504.43	$ 525.14	$ 569.76	$ 586.35
c) The average bill for current service of identified low-income residential accounts in arre	$ 77.49	$ 74.42	$ 71.82	$ 80.22	$ 79.48	$ 80.62
d) The total dollars of identified low-income residential arrears	$ 5,922,679.94	$ 6,086,944.08	$ 6,299,298.07	$ 6,454,511.72	$ 6,714,648.51	$ 6,938,863.93
Bill ending balance of low income accounts with arrears	$ 6,997,728.88	$ 6,937,475.51	$ 7,229,531.69	$ 7,496,717.57	$ 7,643,770.90	$ 8,015,057.86
e) The percentage of total identified low-income residential billed dollars constituting arre	86.40%	86.80%	87.60%	86.80%	87.70%	88.10%
f) The percentage of billed identified low-income residential accounts having arrears	74.30%	74.10%	73.50%	72.10%	68.80%	68.20%
Number of low income arrearage accounts disconnected for non-pay	105	90	34	-	-	-
Total arrearage for low income disconnected accounts	$ 66,277.06	$ 65,640.22	$ 19,123.86			
g) The average arrears of all identified low-income residential accounts disconnected for r	$ 631.21	$ 729.34	$ 562.47			

All totals as of EOM, for PA RESIDENTIAL, LOW INCOME accounts only -->	2020_07	2020_08	2020_09	2020_10	2020_11	2020_12	2021_01
Number of all low income accounts	17,541	17,692	17,827	17,926	17,925	19,472	19,789
Billed charges for all low income accounts	$ 1,538,147.64	$ 1,457,755.22	$ 1,375,388.58	$ 1,456,169.98	$ 1,454,697.14	$ 1,551,944.93	$ 1,744,864.80
Number of low income accounts with arrears	11,874.00	11,831.00	12,382.00	12,742.00	13,469.00	14,719.00	14,841.00
Billed charges for low income accounts with arrears	$ 1,022,607.78	$ 932,726.08	$ 948,503.53	$ 1,012,453.07	$ 1,016,549.96	$ 1,148,088.69	$ 1,293,446.66
a) The average bill for current service for all identified low-income residential accounts	$ 87.69	$ 82.40	$ 77.15	$ 81.23	$ 81.15	$ 79.70	$ 88.17
b) The average arrears of identified low-income residential accounts in arrears	$ 603.40	$ 595.12	$ 612.44	$ 627.48	$ 642.17	$ 650.06	$ 717.40
c) The average bill for current service of identified low-income residential accounts in arre	$ 86.12	$ 78.84	$ 76.60	$ 79.46	$ 75.47	$ 78.00	$ 87.15
d) The total dollars of identified low-income residential arrears	$ 7,164,813.15	$ 7,040,821.92	$ 7,583,216.04	$ 7,995,371.19	$ 8,649,429.38	$ 9,568,298.90	$ 10,646,963.95
Bill ending balance of low income accounts with arrears	$ 8,283,659.64	$ 8,536,931.19	$ 8,926,773.45	$ 9,337,370.47	$ 9,646,720.06	$ 11,309,074.51	$ 11,914,031.97
e) The percentage of total identified low-income residential billed dollars constituting arre	87.70%	89.10%	89.40%	89.20%	89.50%	89.80%	89.10%
f) The percentage of billed identified low-income residential accounts having arrears	67.70%	66.90%	69.50%	71.10%	75.10%	75.60%	75.00%
Number of low income arrearage accounts disconnected for non-pay	-	-	-	-	13	13	4
Total arrearage for low income disconnected accounts					$ 6,092.11	$ 6,613.81	$ 1,660.32
g) The average arrears of all identified low-income residential accounts disconnected for r					$ 468.62	$ 508.75	$ 415.08

All totals as of EOM, for PA RESIDENTIAL, LOW INCOME accounts only -->	2021_02	2021_03	2021_04	2021_05	2021_06	2021_07	2021_08
Number of all low income accounts	19,642	20,110	20,349	20,331	20,489	20,408	20,431
Billed charges for all low income accounts	$ 1,518,745.78	$ 1,560,423.62	$ 1,744,333.42	$ 1,578,480.64	$ 1,601,670.26	$ 1,668,374.77	$ 1,588,731.97
Number of low income accounts with arrears	14,949.00	14,378.00	13,741.00	13,451.00	13,696.00	13,152.00	13,126.00
Billed charges for low income accounts with arrears	$ 1,129,155.65	$ 1,088,045.81	$ 1,173,329.58	$ 1,023,368.75	$ 1,061,984.31	$ 1,067,377.64	$ 1,023,633.46
a) The average bill for current service for all identified low-income residential accounts	$ 77.32	$ 77.59	$ 85.72	$ 77.64	$ 78.17	$ 81.75	$ 77.76
b) The average arrears of identified low-income residential accounts in arrears	$ 752.56	$ 793.28	$ 831.60	$ 827.01	$ 811.28	$ 808.41	$ 806.81
c) The average bill for current service of identified low-income residential accounts in arre	$ 75.53	$ 75.67	$ 85.39	$ 76.08	$ 77.54	$ 81.16	$ 77.99
d) The total dollars of identified low-income residential arrears	$ 11,250,037.68	$ 11,405,708.04	$ 11,427,066.69	$ 11,124,136.71	$ 11,111,256.32	$ 10,632,206.78	$ 10,590,160.72
Bill ending balance of low income accounts with arrears	$ 12,188,533.68	$ 12,752,942.79	$ 12,588,313.69	$ 12,159,912.69	$ 12,222,589.41	$ 11,851,274.11	$ 11,766,418.95
e) The percentage of total identified low-income residential billed dollars constituting arre	90.70%	91.50%	90.70%	91.60%	91.30%	91.00%	91.30%
f) The percentage of billed identified low-income residential accounts having arrears	76.10%	71.50%	67.50%	66.20%	66.80%	64.40%	64.20%
Number of low income arrearage accounts disconnected for non-pay	-	2	16	327	314	220	439
Total arrearage for low income disconnected accounts		$ 601.62	$ 8,078.70	$ 382,666.81	$ 326,381.41	$ 210,336.37	$ 448,164.41
g) The average arrears of all identified low-income residential accounts disconnected for r		$ 300.81	$ 504.92	$ 1,170.23	$ 1,039.43	$ 956.07	$ 1,020.88

All totals as of EOM, for PA RESIDENTIAL, LOW INCOME accounts only -->	2021_09
Number of all low income accounts	20,508
Billed charges for all low income accounts	$ 1,646,199.89
Number of low income accounts with arrears	13,076.00
Billed charges for low income accounts with arrears	$ 1,069,909.69
a) The average bill for current service for all identified low-income residential accounts	$ 80.27
b) The average arrears of identified low-income residential accounts in arrears	$ 798.17
c) The average bill for current service of identified low-income residential accounts in arre	$ 81.82
d) The total dollars of identified low-income residential arrears	$ 10,436,817.05
Bill ending balance of low income accounts with arrears	$ 11,722,199.64
e) The percentage of total identified low-income residential billed dollars constituting arre	90.90%
f) The percentage of billed identified low-income residential accounts having arrears	63.80%
Number of low income arrearage accounts disconnected for non-pay	271
Total arrearage for low income disconnected accounts	$ 291,486.19
g) The average arrears of all identified low-income residential accounts disconnected for r	$ 1,075.59

Witness: Georgetta Parisi
Date: 10/11/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

OFFICE OF CONSUMER ADVOCATE

DATA REQUEST SET II

DOCKET NOS. R-2021-3027385 & R-2021-3027386

OCA-II-29: Please provide a copy of a typical residential notice of disconnection for nonpayment, both water and wastewater, printed in each of the following months:

a. August 2021.
b. November 2019;
c. January 2020; and
d. April 2021.

If more than one type of residential disconnection notice is issued, provide a copy of each.

RESPONSE: See attachment OCA-II-29.

AQUA An Essential Utilities Company

[redacted]

Account Number
[redacted]
MAIN DIVISION
1101010

Aqua Pennsylvania, Inc.
762 W. LANCASTER AVENUE
BRYN MAWR, PA 19010-3489

Toll Free: 877.987.2782
Fax: 866.780.8292
www.aquaamerica.com

10 Day Shut Off Notice

COLLECTION DEPARTMENT OFFICE HOURS ARE
8:00 AM - 5:00 PM WEEKDAYS

Date of Notice	Shut Off Date	Total Amount Due
November 14, 2019	**November 26,2019**	$ 1,144.03

Your bill for $ 1,144.03 is overdue. Because your bill is overdue, we will SHUT OFF service to:
[redacted] **after 8:00 AM on or after undefined.**
Aqua may act on this notice for up to 60 days.

To stop the shut off , you must do the following immediately:

1. Pay the total amount overdue. To pay by phone, call our toll free number at **866.269.2906** or see the back of the payment stub for all payment options.
2. Contact Aqua during normal business hours at **877.987.2782** (Select Collections) to let us know that you made a payment, to make a payment arrangement, or to dispute the overdue bill. You can also contact Aqua at our address above.
3. Call **877.987.2782** during normal business hours (Select Collections) if you or someone in your home has a serious illness or a medical condition.

Important Notice: Payments will not be accepted by Aqua representatives visiting the property. To avoid service termination due to unpaid bill(s), you must make payments at an authorized payment location. For the nearest location, please call 877.987.2782 (Select Collections). If we shut off your service, you may have to pay the following charges to have service restored:

Overdue amount:	$ 1,144.03
Reconnect Fee:	50.00
Total if we shut off your service:	$ 1,194.03

If your service is shut off for non-payment, after making the required payment you must contact Aqua at 877-987-2782 and schedule to have your service reconnected . Your service will be reconnected in accordance with your state approved utility regulations. In most cases service will not be restored until the next business day after your required payment amount has been confirmed.

- Comunicarse con Aqua al 877.987.2782 (elija “Bobranzas” o “Collectiones” en inglés para hacernos saber que realizó el, pago, o para disputar el balance altrasado. También puede communicarse con Aqua a la dirección que aparece arriba.
- Attencion! Este es en mensaje muy importante. Si usted no lo entiende, favor de llama a 877.987.2782.

If you have questions or need more information, please call us. If you are not satisfied after you talk to us, you may file a complaint with the Pennsylvania Public Utility Commission by calling 1(800) 692-7380 toll free, or by writing to P.O. Box 3265, Harrisburg, PA 17105-3265. The Pennsylvania Public Utility Commission will delay the shut off if you file the complaint before the shut off date.

RETURN THIS PORTION WITH YOUR PAYMENT

AQUA An Essential Utilities Company

Aqua Pennsylvania, Inc.
762 W. Lancaster Avenue • Bryn Mawr, PA 19010-3489

URGENT NOTICE - OPEN IMMEDIATELY

Please do not remit payment to the above address

MAKE CHECK PAYABLE TO:
Aqua PA

Account Number
[redacted]

PAST DUE
PAY NOW

TOTAL AMOUNT DUE
$ 1,144.03

Cyc=15WG 1up=2133374 EC: DATA Seq=423

Amount Enclosed $ ____.__

[redacted]

AQUA PENNSYLVANIA
PO BOX 70279
PHILADELPHIA PA 19176-0279

0001470960147629000000114403 4

IMPORTANT TO KNOW - BEFORE WE SHUT OFF YOUR UTILITY SERVICE

- **If we shut off your service during the winter months (between Dec. 1 – Mar. 31)** we will restore your service within 24 hours of your meeting all requirements/conditions to have service reconnected. Where street digging is required it may take up 7 to days.
- If you are a victim of domestic violence and have a Protection From Abuse Order or other court order that shows clear evidence of domestic violence, there are special protections available. **Call us immediately at 877.987.2782.** (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment agreement or special assistance programs. Call **877.987.2782 right away** to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
- If your landlord pays your utility bill: You have certain legal protections. Please call us at 877.987.2782.
- If you have trouble understanding or speaking English or have a disability please call us at 877.987.2782 for free interpretation.
- If your service is shut off, you may be required to pay more than the amount listed on the front of this notice to have your service turned back on. You may have to pay any additional bills that have become past due.
- All adult occupants of the premise whose name appears on the mortgage, deed, or lease are considered "customers" and are responsible for payment of this bill.
- If service is shut off, ANY adult occupant who has been living at the premise may have to pay all or portions of this bill to have service restored.
- If your service is shut off, you must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premise.
- After all conditions have been met to have the service turned back on, it may take up to 7 days to have your service restored. Please contact us to discuss the details.
- If you need water to heat your property, please contact Aqua immediately at 877.987.2782 (and choose Collections) so we can arrange a service visit to verify that need. The company will act in accordance with the public utility laws with respect to water service shut offs.

MEDICAL EMERGENCY NOTICE

Let us know if someone living in your home is seriously ill or has a medical condition. **WE WILL NOT SHUT OFF YOUR SERVICE provided you:**

A. Provide a medical certification by a licensed physician, nurse practitioner or physician's assistant. Medical certifications must be in writing and signed by your physician, nurse practitioner or physician's assistant by fax, email or mail within three days.

AND

B. Make some equitable arrangements to pay your current bills for service.

Call **Aqua at 877-987-2782** to let us know about your medical emergency.

FAX: **610.520.2168** or **toll-free at 866.780.8301**

Address: ATTN: Collections Department, Aqua Pennsylvania, Inc, 762 W. Lancaster Avenue, Bryn Mawr, PA 19010

Ways to Pay Your Water Bill

Save time and cut clutter with paperless billing!

Enroll today in WaterSmart e-Billing. You can cut the clutter of a paper bill, and we'll notify you by email when your bill is available to view online. It's simple, secure, and no additional fees.

Visit AquaAmerica.com for more details.

WaterSmart e-Billing

Water Bill Speedpay by Phone, Online or by Text

By Phone: using a credit card (American Express, Visa, Mastercard or Discover) or by check by calling Speedpay toll free at 866.269.2906.

Online: at https://internet.speedpay.com/aqua Please note: Speedpay charges a $2.25 processing fee for each transaction.

By Text: Opt in via the Western Union IVR or the Western Union website to receive bill reminder text messages and the option to pay your bill using your mobile device.

Water Bill Mail Payments

You can mail your Aqua bill payment to this address:

Aqua
P.O. Box 70279
Philadelphia, PA 19176-0279

* Please note, this is Aqua's new address for bill payments, which will be reflected on January's bill.

AQUA An Essential Utilities Company

[redacted]

Account Number
[redacted]

Aqua Pennsylvania, Inc.
762 W. LANCASTER AVENUE
BRYN MAWR, PA 19010-3489

Toll Free: 877.987.2782
Fax: 866.780.8292
www.aquaamerica.com

10 Day Shut Off Notice

COLLECTION DEPARTMENT OFFICE HOURS ARE
8:00 AM - 5:00 PM WEEKDAYS

Date of Notice	Shut Off Date	Total Amount Due
January 09, 2020	**January 23, 2020**	$ [redacted]

Your bill for $ [redacted] is overdue. Because your bill is overdue, we will SHUT OFF service to:
[redacted] **after 8:00 AM on or after undefined.**
Aqua may act on this notice for up to 60 days.

To stop the shut off , you must do the following immediately:

1. Pay the total amount overdue. To pay by phone, call our toll free number at **866.269.2906** or see the back of the payment stub for all payment options.
2. Contact Aqua during normal business hours at **877.987.2782** (Select Collections) to let us know that you made a payment, to make a payment arrangement, or to dispute the overdue bill. You can also contact Aqua at our address above.
3. Call **877.987.2782** during normal business hours (Select Collections) if you or someone in your home has a serious illness or a medical condition.

Important Notice: Payments will not be accepted by Aqua representatives visiting the property. To avoid service termination due to unpaid bill(s), you must make payments at an authorized payment location. For the nearest location, please call 877.987.2782 (Select Collections). If we shut off your service, you may have to pay the following charges to have service restored:

Overdue amount:	$ [redacted]
Reconnect Fee:	50.00
Total if we shut off your service:	$ [redacted]

If your service is shut off for non-payment, after making the required payment you must contact Aqua at 877-987-2782 and schedule to have your service reconnected . Your service will be reconnected in accordance with your state approved utility regulations. In most cases service will not be restored until the next business day after your required payment amount has been confirmed.

- Comunicarse con Aqua al 877.987.2782 (elija “Bobranzas” o “Collectiones” en inglés para hacernos saber que realizó el, pago, o para disputar el balance altrasado. También puede communicarse con Aqua a la dirección que aparece arriba.
- Attencion! Este es en mensaje muy importante. Si usted no lo entiende, favor de llama a 877.987.2782.

If you have questions or need more information, please call us. If you are not satisfied after you talk to us, you may file a complaint with the Pennsylvania Public Utility Commission by calling 1(800) 692-7380 toll free, or by writing to P.O. Box 3265, Harrisburg, PA 17105-3265. The Pennsylvania Public Utility Commission will delay the shut off if you file the complaint before the shut off date.

RETURN THIS PORTION WITH YOUR PAYMENT

AQUA An Essential Utilities Company

Aqua Pennsylvania, Inc.
762 W. Lancaster Avenue • Bryn Mawr, PA 19010-3489

URGENT NOTICE - OPEN IMMEDIATELY

Please do not remit payment to the above address

MAKE CHECK PAYABLE TO:
Aqua PA

Account Number
[redacted]

PAST DUE
PAY NOW

TOTAL AMOUNT DUE
$ [redacted]

Cyc=31AB 1up=2158439 EC: DATA Seq=2460

Amount Enclosed $ ___.__

[redacted]

AQUA PENNSYLVANIA
PO BOX 70279
PHILADELPHIA PA 19176-0279

00109014507950740000000568128

IMPORTANT TO KNOW - BEFORE WE SHUT OFF YOUR UTILITY SERVICE

- **If we shut off your service during the winter months (between Dec. 1 – Mar. 31)** we will restore your service within 24 hours of your meeting all requirements/conditions to have service reconnected. Where street digging is required it may take up 7 to days.
- If you are a victim of domestic violence and have a Protection From Abuse Order or other court order that shows clear evidence of domestic violence, there are special protections available. **Call us immediately at 877.987.2782.** (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment agreement or special assistance programs. Call **877.987.2782 right away** to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
- If your landlord pays your utility bill: You have certain legal protections. Please call us at 877.987.2782.
- If you have trouble understanding or speaking English or have a disability please call us at 877.987.2782 for free interpretation.
- If your service is shut off, you may be required to pay more than the amount listed on the front of this notice to have your service turned back on. You may have to pay any additional bills that have become past due.
- All adult occupants of the premise whose name appears on the mortgage, deed, or lease are considered "customers" and are responsible for payment of this bill.
- If service is shut off, ANY adult occupant who has been living at the premise may have to pay all or portions of this bill to have service restored.
- If your service is shut off, you must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premise.
- After all conditions have been met to have the service turned back on, it may take up to 7 days to have your service restored. Please contact us to discuss the details.
- If you need water to heat your property, please contact Aqua immediately at 877.987.2782 (and choose Collections) so we can arrange a service visit to verify that need. The company will act in accordance with the public utility laws with respect to water service shut offs.

MEDICAL EMERGENCY NOTICE

Let us know if someone living in your home is seriously ill or has a medical condition. **WE WILL NOT SHUT OFF YOUR SERVICE provided you:**

A. Provide a medical certification by a licensed physician, nurse practitioner or physician's assistant. Medical certifications must be in writing and signed by your physician, nurse practitioner or physician's assistant by fax, email or mail within three days.

AND

B. Make some equitable arrangements to pay your current bills for service.

Call **Aqua at 877-987-2782** to let us know about your medical emergency.

FAX: **610.520.2168** or **toll-free at 866.780.8301**

Address: ATTN: Collections Department, Aqua Pennsylvania, Inc, 762 W. Lancaster Avenue, Bryn Mawr, PA 19010

Ways to Pay Your Water Bill

Save time and cut clutter with paperless billing!

Enroll today in WaterSmart e-Billing. You can cut the clutter of a paper bill, and we'll notify you by email when your bill is available to view online. It's simple, secure, and no additional fees.

Visit AquaAmerica.com for more details.

WaterSmart e-Billing

Water Bill Speedpay by Phone, Online or by Text

By Phone: using a credit card (American Express, Visa, Mastercard or Discover) or by check by calling Speedpay toll free at 866.269.2906.

Online: at https://internet.speedpay.com/aqua Please note: Speedpay charges a $2.25 processing fee for each transaction.

By Text: Opt in via the Western Union IVR or the Western Union website to receive bill reminder text messages and the option to pay your bill using your mobile device.

Water Bill Mail Payments

You can mail your Aqua bill payment to this address:

Aqua
P.O. Box 70279
Philadelphia, PA 19176-0279

* Please note, this is Aqua's new address for bill payments, which will be reflected on January's bill.

AQUA An Essential Utilities Company

[redacted]

Account Number
[redacted]

MAIN DIVISION
1101010

Aqua Pennsylvania, Inc.
762 W. LANCASTER AVENUE
BRYN MAWR, PA 19010-3489

Toll Free: 877.987.2782
Fax: 866.780.8292
www.aquaamerica.com

10 Day Shut Off Notice

COLLECTION DEPARTMENT OFFICE HOURS ARE
8:00 AM - 5:00 PM WEEKDAYS

Date of Notice	Shut Off Date	Total Amount Due
April 19, 2021	May 4, 2021	$ 314.90

Your bill for $ 314.90 is overdue. Because your bill is overdue, we will SHUT OFF service to:
[redacted] **after 8:00 AM on or after May 4, 2021.**
Aqua may act on this notice for up to 60 days.

To stop the shut off , you must do the following immediately:

1. Pay the total amount overdue. To pay by phone, call our toll free number at **866.269.2906** or see the back of the payment stub for all payment options.
2. Contact Aqua during normal business hours at **877.987.2782** (Select Collections) to let us know that you made a payment, to make a payment arrangement, or to dispute the overdue bill. You can also contact Aqua at our address above.
3. Call **877.987.2782** during normal business hours (Select Collections) if you or someone in your home has a serious illness or a medical condition.

Important Notice: Payments will not be accepted by Aqua representatives visiting the property. To avoid service termination due to unpaid bill(s), you must make payments at an authorized payment location. For the nearest location, please call 877.987.2782 (Select Collections). If we shut off your service, you may have to pay the following charges to have service restored:

Overdue amount:	$ 314.90
Reconnect Fee:	50.00
Total if we shut off your service:	$ 364.90

If your service is shut off for non-payment, after making the required payment you must contact Aqua at 877-987-2782 and schedule to have your service reconnected . Your service will be reconnected in accordance with your state approved utility regulations. In most cases service will not be restored until the next business day after your required payment amount has been confirmed.

- Comunicarse con Aqua al 877.987.2782 (elija “Bobranzas” o “Collectiones” en inglés para hacernos saber que realizó el, pago, o para disputar el balance altrasado. También puede communicarse con Aqua a la dirección que aparece arriba.
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If you have questions or need more information, please call us. If you are not satisfied after you talk to us, you may file a complaint with the Pennsylvania Public Utility Commission by calling 1(800) 692-7380 toll free, or by writing to P.O. Box 3265, Harrisburg, PA 17105-3265. The Pennsylvania Public Utility Commission will delay the shut off if you file the complaint before the shut off date.

RETURN THIS PORTION WITH YOUR PAYMENT

AQUA An Essential Utilities Company

Aqua Pennsylvania, Inc.
762 W. Lancaster Avenue • Bryn Mawr, PA 19010-3489

URGENT NOTICE - OPEN IMMEDIATELY

Please do not remit payment to the above address

MAKE CHECK PAYABLE TO:
Aqua PA

Account Number
[redacted]

PAST DUE
PAY NOW

TOTAL AMOUNT DUE
$ 314.90

Cyc=15W3 1up=3007750 EC: TERM Seq=2574

Amount Enclosed $ ___.__

[redacted]

AQUA PENNSYLVANIA
PO BOX 70279
PHILADELPHIA PA 19176-0279

0009857610157887000000314904

IMPORTANT TO KNOW - BEFORE WE SHUT OFF YOUR UTILITY SERVICE

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- You may be eligible for a payment agreement or special assistance programs. Call **877.987.2782 right away** to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
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AND

B. Make some equitable arrangements to pay your current bills for service.

Call **Aqua at 877-987-2782** to let us know about your medical emergency.

FAX: **610.520.2168** or **toll-free at 866.780.8301**

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Visit AquaAmerica.com for more details.

WaterSmart e-Billing

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Online: at https://internet.speedpay.com/aqua Please note: Speedpay charges a $2.25 processing fee for each transaction.

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You can mail your Aqua bill payment to this address:

Aqua
P.O. Box 70279
Philadelphia, PA 19176-0279

* Please note, this is Aqua's new address for bill payments, which will be reflected on January's bill.

AQUA An Essential Utilities Company

[redacted]

Account Number
[redacted]
MAIN DIVISION
1101010

Aqua Pennsylvania, Inc.
762 W. LANCASTER AVENUE
BRYN MAWR, PA 19010-3489

Toll Free: 877.987.2782
Fax: 866.780.8292
www.aquaamerica.com

10 Day Shut Off Notice

COLLECTION DEPARTMENT OFFICE HOURS ARE
8:00 AM - 5:00 PM WEEKDAYS

Date of Notice	Shut Off Date	Total Amount Due
August 10, 2021	August 24, 2021	$ 2,645.80

Your bill for $ 2,645.80 is overdue. Because your bill is overdue, we will SHUT OFF service to:
[redacted] **after 8:00 AM on or after August 24, 2021.**
Aqua may act on this notice for up to 60 days.

To stop the shut off , you must do the following immediately:

1. Pay the total amount overdue. To pay by phone, call our toll free number at **866.269.2906** or see the back of the payment stub for all payment options.
2. Contact Aqua during normal business hours at **877.987.2782** (Select Collections) to let us know that you made a payment, to make a payment arrangement, or to dispute the overdue bill. You can also contact Aqua at our address above.
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Overdue amount:	$ 2,645.80
Reconnect Fee:	50.00
Total if we shut off your service:	$ 2,695.80

If your service is shut off for non-payment, after making the required payment you must contact Aqua at 877-987-2782 and schedule to have your service reconnected . Your service will be reconnected in accordance with your state approved utility regulations. In most cases service will not be restored until the next business day after your required payment amount has been confirmed.

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RETURN THIS PORTION WITH YOUR PAYMENT

AQUA An Essential Utilities Company
Aqua Pennsylvania, Inc.
762 W. Lancaster Avenue • Bryn Mawr, PA 19010-3489
URGENT NOTICE - OPEN IMMEDIATELY

Please do not remit payment to the above address

MAKE CHECK PAYABLE TO:
Aqua PA

Account Number
[redacted]

PAST DUE
PAY NOW

TOTAL AMOUNT DUE
$ 2,645.80

Cyc=35F6 1up=3216666 EC: TERM Seq=1010

Amount Enclosed $ ____.__

[redacted]

AQUA PENNSYLVANIA
PO BOX 70279
PHILADELPHIA PA 19176-0279

0020946400056940000000026458 01

IMPORTANT TO KNOW - BEFORE WE SHUT OFF YOUR UTILITY SERVICE

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Aqua
P.O. Box 70279
Philadelphia, PA 19176-0279

* Please note, this is Aqua's new address for bill payments, which will be reflected on January's bill.

Witness: Georgetta Parisi-Knup
Date:

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

OFFICE OF CONSUMER ADVOCATE

DATA REQUEST SET II

DOCKET NOS. R-2021-3027385 & R-2021-3027386

OCA-II-37: Please provide a copy of all reports, evaluations, memos, analyses or other written documents of any nature containing a list and/or discussion of specific performance indicators on which empirical data has been collected for the Company, both water and wastewater, with respect to:

a. Debt prevention;
b. Debt management;
c. The treatment of vulnerable residential customers.

RESPONSE: (a)-(b) See response to OCA-II-36
(c) See attachment OCA-37 for the work of the Helping Hand Collaborative.

NYSE: WTRG

Helping Hand Collaborative Meeting IV

May 2021

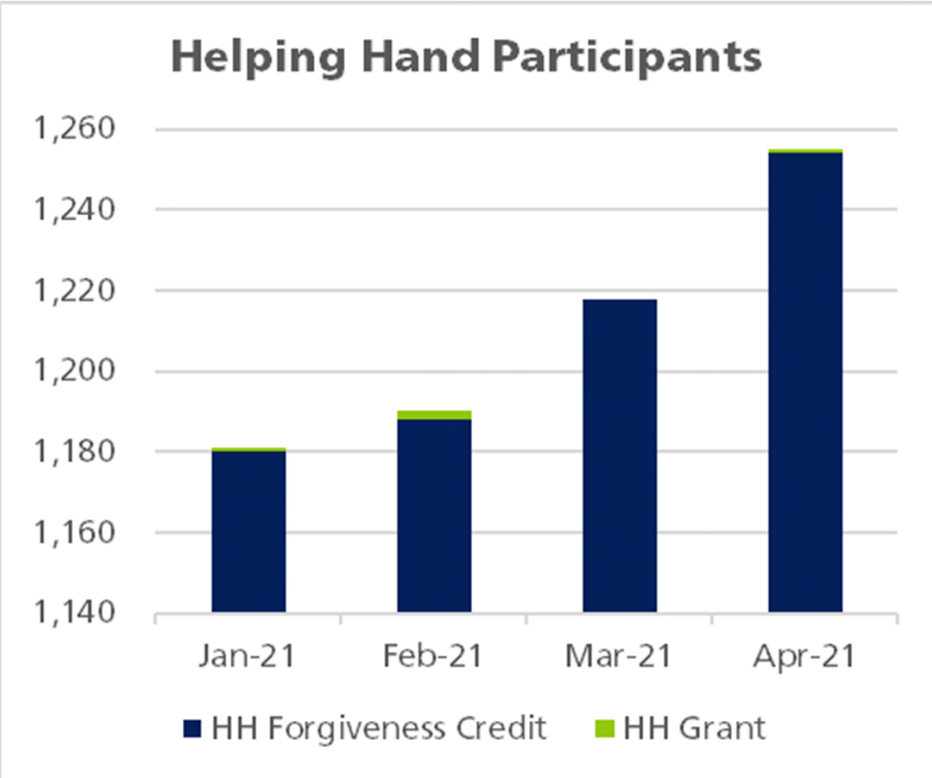
AQUA℠
An Essential Utilities Company

Agenda

- Welcome
- Helping Hand Enrollment
- Helping Hand Distributions
- Helping Hand Grant Program
- ERAP- Utility Assistance
- Universal Services Program

Essential NYSE: WTRG

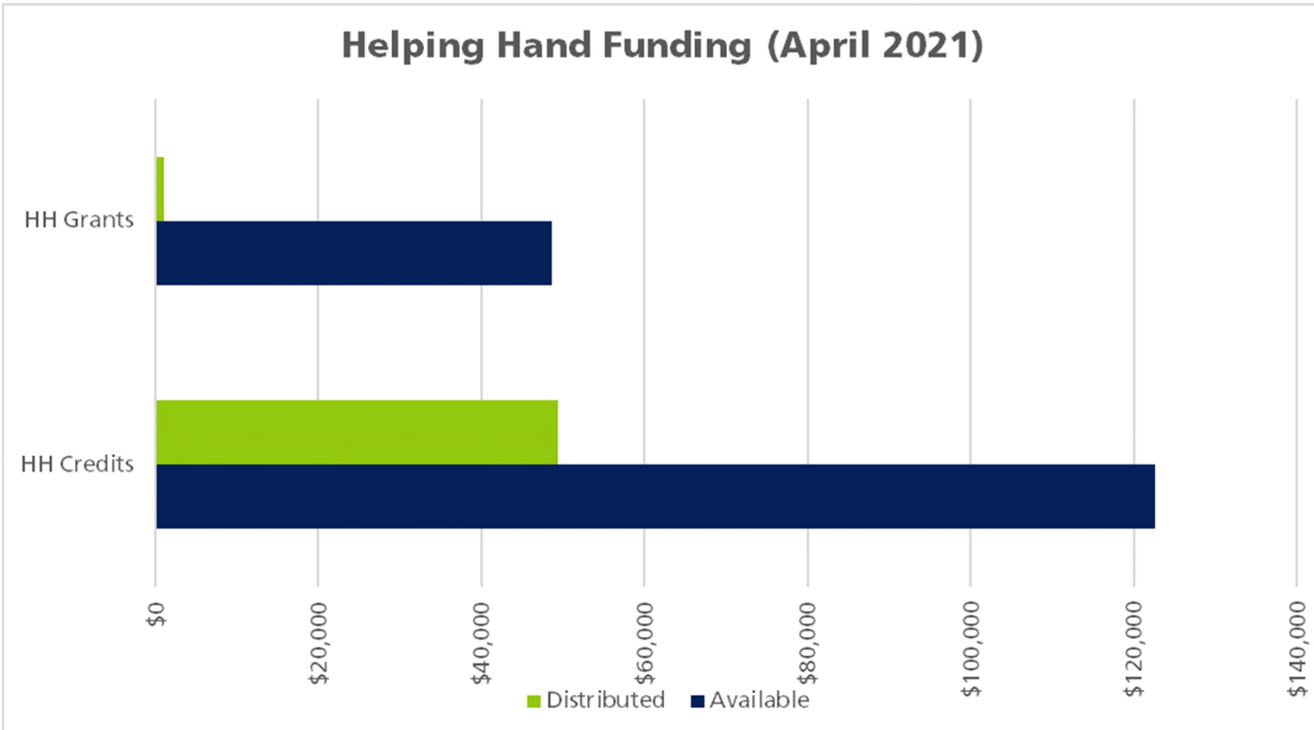
Helping Hand Enrollment



Helping Hand Participants	Jan-21	Feb-21	Mar-21	Apr-21
Starting Participants	1,174	1,181	1,190	1,218
New HH Credit Applicants	49	39	66	81
New HH Grant Recipients	1	2	0	1
Completed	-43	-32	-38	-45
Defaults	0	0	0	0
Ending Participants	1,181	1,190	1,218	1,255

AQUA
An Essential Utilities Company

Helping Hand Distribution



2021 Funding	Available	Distributed
HH Credits	$122,633	$49,425
HH Grants	$48,669	$1,011

2020 Funding	Available	Distributed
HH Credits	$341,773	$329,628
HH Grants	$64,441	$13,980

AQUA
An Essential Utilities Company

Helping Hand Grant Program

Eligible to residential and small business customers

Up to $150 available to:

- **Enable continuous billing assistance**
- **Help prevent shut off**

Available to support high bills :

Assistance for unexpected or unexplainable spikes in usage

AQUA℠
An Essential Utilities Company

ERAP-Utility Assistance

- Customer Outreach:
  - CSR inform, bill messaging, social media, website, flyers, business cards, etc.
- County Partnership:
  - Company lead contact assigned
  - Timely account/balance verification
  - Streamlined procedures

Date	# of Applicants	Account Balance	Amount Paid
5/11/2021	84	$ 83,493.48	$ 31,410.59

AQUA
An Essential Utilities Company

NYSE: WTRG

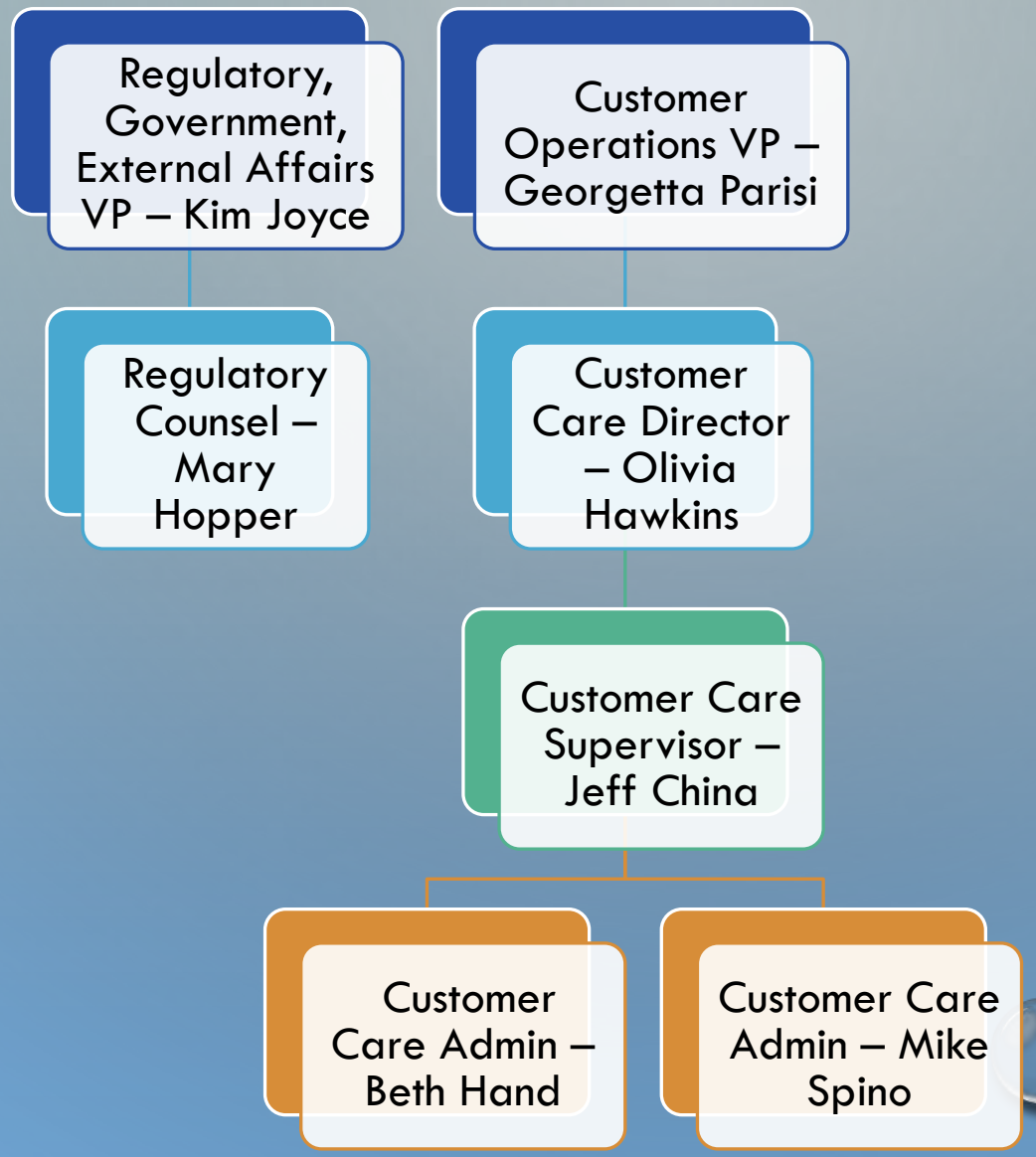
Aqua Pennsylvania Universal Service Program Pilot Proposal

AQUA℠
An Essential Utilities Company

HELPING HAND COLLABORATIVE MEETING II

DECEMBER 2019

AQUA STAFF


Regulatory, Government, External Affairs VP – Kim Joyce
Customer Operations VP – Georgetta Parisi
Regulatory Counsel – Mary Hopper
Customer Care Director – Olivia Hawkins
Customer Care Supervisor – Jeff China
Customer Care Admin – Beth Hand
Customer Care Admin – Mike Spino

AGENDA

- WELCOME
- HELPING HAND PROGRAM
- UPDATES

HELPING HAND

- **COMMUNICATION TO AGENCIES COMPLETED:**
  - PROGRAM ENHANCEMENTS INTRODUCED
  - APPLICATION AND WELCOME LETTER UPDATED (EXHIBITS A & B)
  - REGULAR FOLLOW UP MEETINGS SCHEDULED
- **EXISTING ENROLLEE TRANSITION COMPLETED:**
  - CUSTOMERS INFORMED VIA PHONE
  - NOTIFICATION SENT VIA MAIL (EXHIBIT C)
  - NEW COUPON BOOKS SENT

HH Existing Customers Transistion	# of Customers	Current Total Average Payments	Current Average Mo. Payment	New Total Average Payments	New Average Mo. Payment
Total	120	$ 13,927.00	$ 116.06	$ 11,148.83	$ 92.91
Increased Customers	16	$ 1,943.00	$ 121.44	$ 2,584.81	$ 161.55
Decreased Customers	114	$ 11,984.00	$ 115.23	$ 8,564.02	$ 82.35

HELPING HAND

- **OUTREACH AREAS TARGETED:**

County	Delaware	# of conn	Chester	# of conn	Northumberland	# of conn	Luzerne	# of conn	Schuylkill County	# of conn	Mercer county	# of conn	Pike County	# of conn
% impoverished	7.30%	63,069	5%	12,851	8.05%	5,631	8.73%	2,470	6.67%	1,015	6.85%	6,097	5.30%	4,355

- **CURRENT ENROLLMENT**
  - PARTICIPANTS PER COUNTY:

Bradford	BU	CH	Clearfield	DE	Mercer	MO	Monroe	NU	Wayne	Grand Total
5	10	3	1	108	16	10	1	37	2	193

BU=BUCKS CH = CHESTER MO = MONTGOMERY NU= NORTHUMBERLAND

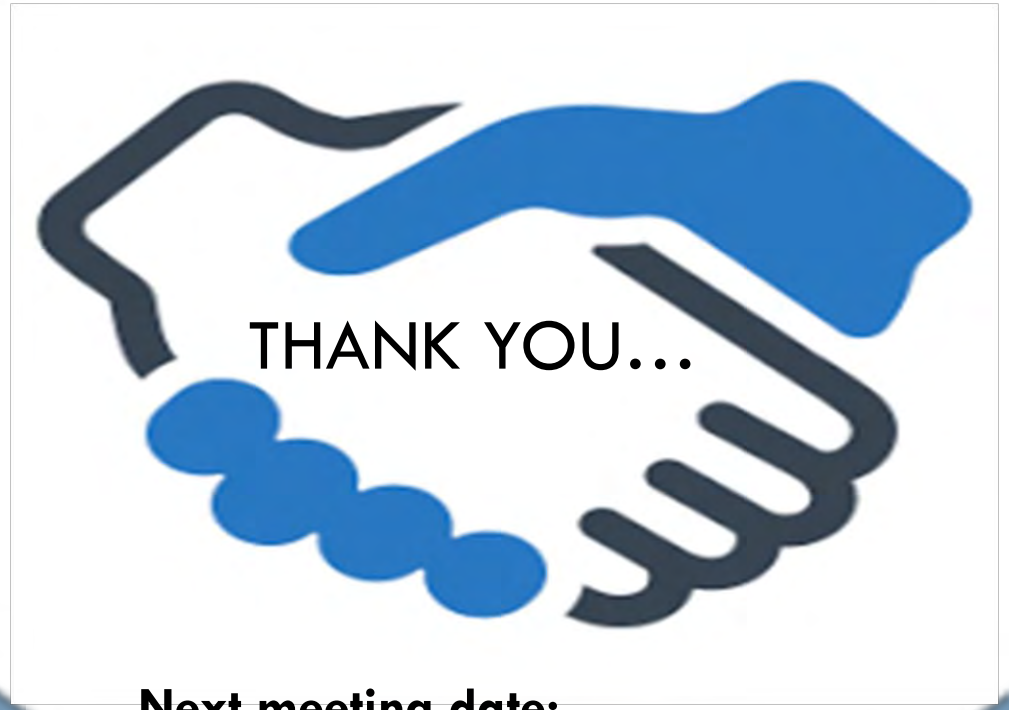
  - AVERAGE ARREARS PAYMENT … $113.83
  - AVERAGE ARREARS BALANCE … $1302.83
  - TOTAL ARREARS BALANCE … $251,445.93

HELPING HAND

- **GRANT PROGRAM** (EXHIBIT F)
  - PROGRAM EXPLANATION
  - COMPANY CONTRIBUTION
  - FUTURE ENHANCEMENTS
    - EXPAND TO ALL AGENCIES
    - EVALUATE GRANT AMOUNT

UPDATES

- **ANNUAL REVIEW PROCESS**
  - MANUAL PROCESS UNTIL AUTOMATION
- **DOMESTIC VIOLENCE PROCESS** (EXHIBIT G)



Next meeting date:_____

HELPING HAND COLLABORATIVE MEETING III

OCTOBER 2020

AGENDA

- WELCOME
- PA COVID-19 CAP INITIATIVES
- HELPING HAND ACTION PLANS
- HELPING HAND PARTICIPATION
- HELPING HAND FUNDING DISTRIBUTION
- ADDITIONAL UPDATES

COVID-19 CAP INITIATIVES

Helping Hand Program is a program for a monthly credit available for low or zero income customers	**Helping Hand Grant** is a grant that can be applied to any customer in need of assistance	**Payment Arrangement** is another Customer Assistance Program
• $185,000 available in funding • Ability to add an additional $125,000 of funding for 2020 • Abatement process with existing participants • Aggressively campaign to get new entrants into the program • New entrants directly from CSRs, Community Action Agencies, legislators, direct email, post cards, and calls • Review low income customer list to proactively reach out to these customers to enroll and or apply credits proactively without enrollment	• $64,000 available in funding • CSRs to evaluate a customer's situation and submit grant credits based on the guidelines • Evaluate existing HH customer base high balance accounts for trends (increased usage, leaks transferred balance), payment history, program duration, etc. for opportunities to proactively provide credits.	• No deposit required • Minimum payment of $15.00 plus current balance • Terms up to 60 months • If customer defaults, another payment arrangement can be made

HELPING HAND ACTIONS

Action Plans

Program Adjustments:

- Modified program requirements
- Offer enrollment credit
- Updated credit adjustment codes to rate codes to improve account processing and customer insight.
- Implemented ability for CSRs to give customer credits while on the phone with customer
- Identified and analyzed low income customers in Banner
  - 265 past due balances at or below delinquency that were provided an advance COVID-19 credit total of $19,514. Credits applied and notification sent during month of June.
  - 3200 low income customers targeted with post card outreach during month of June.

Messaging Campaign:

- Social Media – organic posts on Facebook and Twitter
- Direct Mail – postcards to customers all PA customers
- Grassroots – outreach to agencies that run the program, including training session on the program and how to refer customers and/or complete the application with customers
- Employee Engagement – blog on Info stream, Leadership communication

Measurement and Analytics:

- Increase in program participation

HELPING HAND ACTIONS CONT…

Action Plans

Phase 2 and 3 (Helping Hand Credits)

- Phase 2 - Introduce tiered forgiveness credits of $50-150/month to level out assistance based on customer need (account balance for new enrollees and arrears moving forward):
  - Tier 1 - Up to $110 = pay off
  - Tier 2 - $111 - $300 = $50 credit
  - Tier 3 - $301 - $500 = $75 credit
  - Tier 4 - $501 - $700 = $100 credit
  - Tier 5 - $701 - $900 = $125 credit
  - Tier 6 - $901 & up = $150 credit

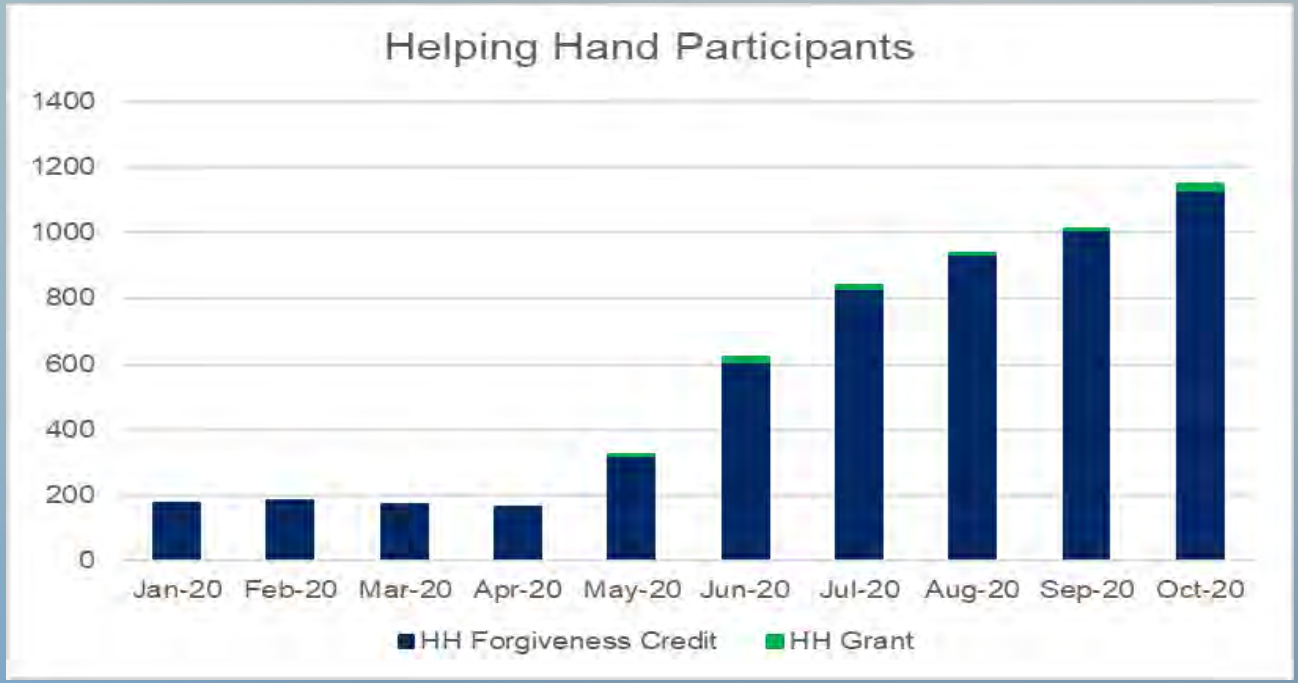
- Phase 3 - Review entire PA customer base for assistance opportunities to provide abatements:
  - Assist low income customer base currently not enrolled in HH program

- Evaluate existing HH customer base for trends with consumption (leaks, high usage), payment history, balances (increasing, transferred), program duration, etc.

COVID-19 Grant Modifications:

- Includes non-low income residential and commercial customers
- Grant credit proactively distributed based on average bill:
  - $0-$50 - Average Bill: ($25 Grant Credit)
  - $51-$75 - Average Bill: ($50 Grant Credit)
  - $76+ - Average Bill: ($75 Grant Credit)
  - Offered in addition to payment arrangement assistance

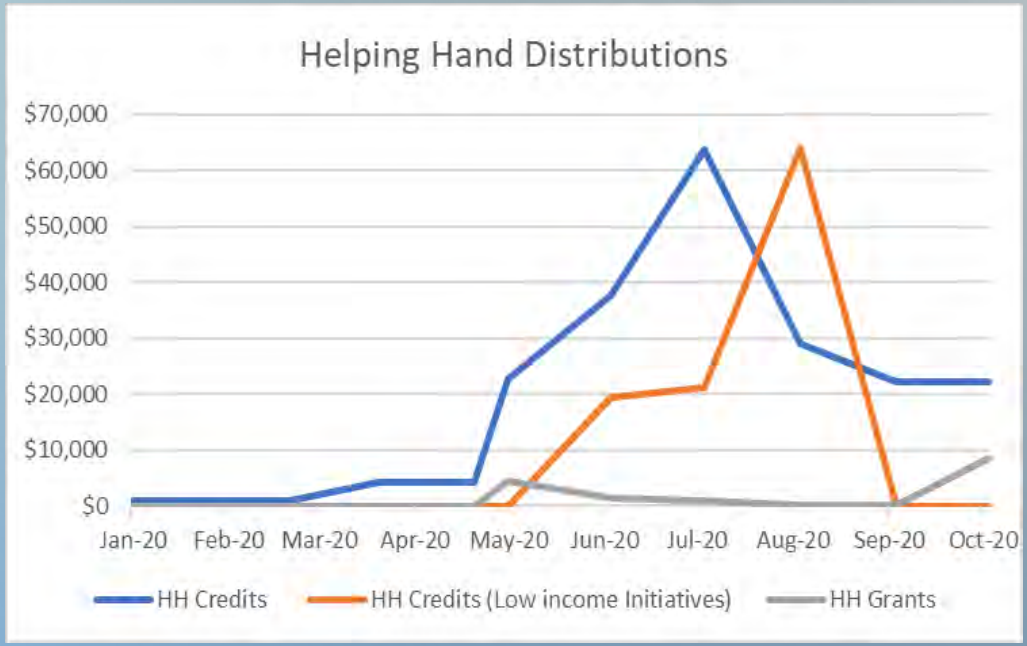
HELPING HAND PARTICIPANTS

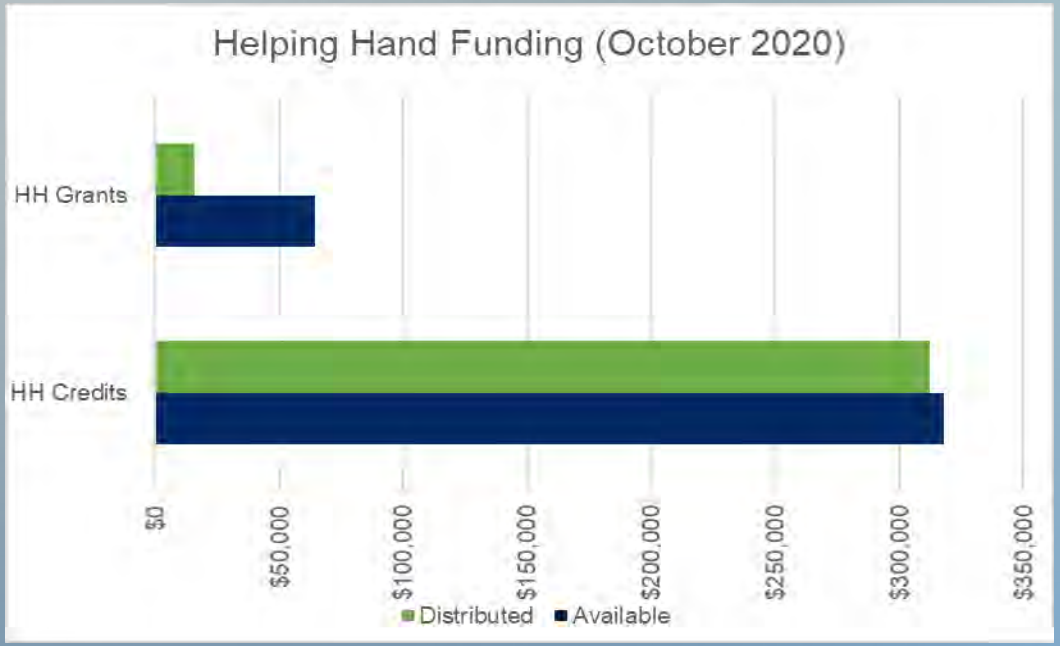


- Applicants includes 69 participants not enrolled whose balance (less than $110) was paid off in good faith.

Helping Hand Participants	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20
Starting Participants	183	179	184	173	167	320	606	828	936	1009
New HH Credit Applicants	16	18	7	2	155	300	241	147	87	127
New HH Grant Recipients	*	*	*	0	6	15	14	2	2	20
Completed	-2	0	-5	-8	-8	-29	-33	-41	-16	-26
Defaults	-18	-13	-13	0	0	0	0	0	0	0
Ending Participants	179	184	173	167	320	606	828	936	1009	1130

HELPING HAND DISTRIBUTION & FUNDS





Helping Hand Distributions	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20
HH Credits	$900	$940	$4,325	$4,175	$22,620	$37,634	$63,626	$29,084	$22,238	$22,233
HH Credits (Low income Initiatives)	$0	$0	$0	$0	$0	$19,515	$21,241	$63,849	$0	$0
HH Grants	$0	$0	$0	$0	$4,586	$1,452	$955	$110	$75	$8,650

Helping Hand Funding Oct. 2020	Available	Distributed
HH Credits	$318,000	$312,378
HH Grants	$64,400	$15,828

HELPING HAND BILL EXAMPLES

Helping Hand Grant Bill Example

AQUA

Service To:
FRANCIS FRITZ
6777 PERRY AVE
UPPER DARBY, PA 19082-4312

Account Number
000234470 0234470
MAIN DIVISION
1101010 PWSID # PA1460073

Aqua Pennsylvania, Inc.
762 W. Lancaster Avenue
Bryn Mawr, PA 19010-3489

Toll Free: 877.987.2782
Fax: 866.780.8292
www.aquaamerica.com

Questions about your water service?... Contact us before the due date.

Bill Date	Total Amount Due	Current Charges Due Date
May 13, 2020	$ 180.48	June 04, 2020

Meter Data

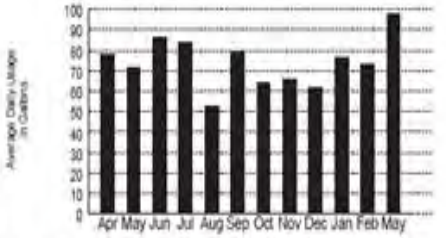
Meter	Size	Billing Period	Days	Read Type	Meter Readings	Usage	Units
63041639	5/8	05/07/20	83	Actual	612300	8,100	Gallons
		02/14/20		Actual	604200		

Average Daily Usage = 97 Gallons — Total Days: 83 — Total Usage: 8,100 Gallons

Billing Detail

Amount Owed from Last Bill		$ 41.82
Total Payments Received		0.00
Remaining Balance		**41.82**
Customer Charge	49.80	
5,533 gallons @ $0.010649 per gallon	58.93	
Next 2,567 gallons @ $0.012608 per gallon	32.37	
Total Water Charges		141.10
Helping Hand Grant		2.44 Credit
Amount Due		**$ 180.48**

Water Usage History



Read Types: ■ Actual □ Estimated ▨ Customer

Helping Hand Credit Bill Example

AQUA

Service To:
MARILYN D. ABADIE
210 WINONA AVE APT A
HOLMES, PA 19043-1509

Account Number
002297890 0073503
MAIN DIVISION
1101010 PWSID # PA1460073

Aqua Pennsylvania, Inc.
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Bryn Mawr, PA 19010-3489

Toll Free: 877.987.2782
Fax: 866.780.8292
www.aquaamerica.com

Questions about your water service?... Contact us before the due date.

Bill Date	Total Amount Due	Current Charges Due Date
May 11, 2020	$ 549.50	June 02, 2020

Meter Data

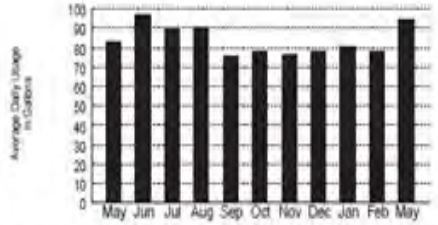
Meter	Size	Billing Period	Days	Read Type	Meter Readings	Usage	Units
16065922	5/8	05/07/20	94	Actual	132400	8,900	Gallons
		02/03/20		Actual	123500		

Average Daily Usage = 94 Gallons — Total Days: 94 — Total Usage: 8,900 Gallons

Billing Detail

Amount Owed from Last Bill		$ 494.15
Total Payments Received		51.00
Remaining Balance		**443.15**
Adjustments		25.00 Credit
Customer Charge	56.40	
6,267 gallons @ $0.010649 per gallon	66.74	
Next 2,633 gallons @ $0.012608 per gallon	33.21	
Total Water Charges		156.35
Helping Hand Credit		25.00 Credit
Amount Due		**$ 549.50**

Water Usage History



Read Types: ■ Actual □ Estimated ▨ Customer

TARGETED OUTREACH BROCHURE

AQUA
An Essential Utilities Company

Aqua Pennsylvania
762 Lancaster Ave
Bryn Mawr, PA 19010

NEW!
For a limited time, all new Helping Hand participants will receive a $25 enrollment credit — in addition to monthly credits!

As COVID-19 continues to financially impact businesses and families in our communities, Aqua Pennsylvania is reminding customers about Helping Hand, an assistance program to help customers make manageable monthly payments on their water and wastewater bills.

Helping Hand lets customers earn a monthly credit toward their past-due balances, and includes a conservation kit to help customers reduce water usage to lower bills.

Eligible customers include those with a household income less than:

$25,520 for individuals	$61,360 for a family of 5
$34,480 for a family of 2	$70,320 for a family of 6
$43,440 for a family of 3	$79,280 for a family of 7
$52,400 for a family of 4	$88,240 for a family of 8

If you or someone you know could benefit from the Helping Hand program, signing up is easier than ever. Call **877.987.2782**. You can learn more information at **aquaamerica.com/assist**, including information about local partnering organizations.

Distributed with bills to low income customers through month of June 2020

HELPING HAND PROGRAM REVIEW

- PAYMENT HISTORY ANALYSIS

Payment History thru August	<April	May	June	July	Aug	Total
	305	6	65	185	306	867
	35%	*1%*	*7%*	*21%*	*35%*	

Past Due Balance thru Aug.	$0-$109	$110 - $499	$500 - $999	$1000 - $2,499	$2,500 - $4,999	$5000 +
	34	345	220	180	68	20

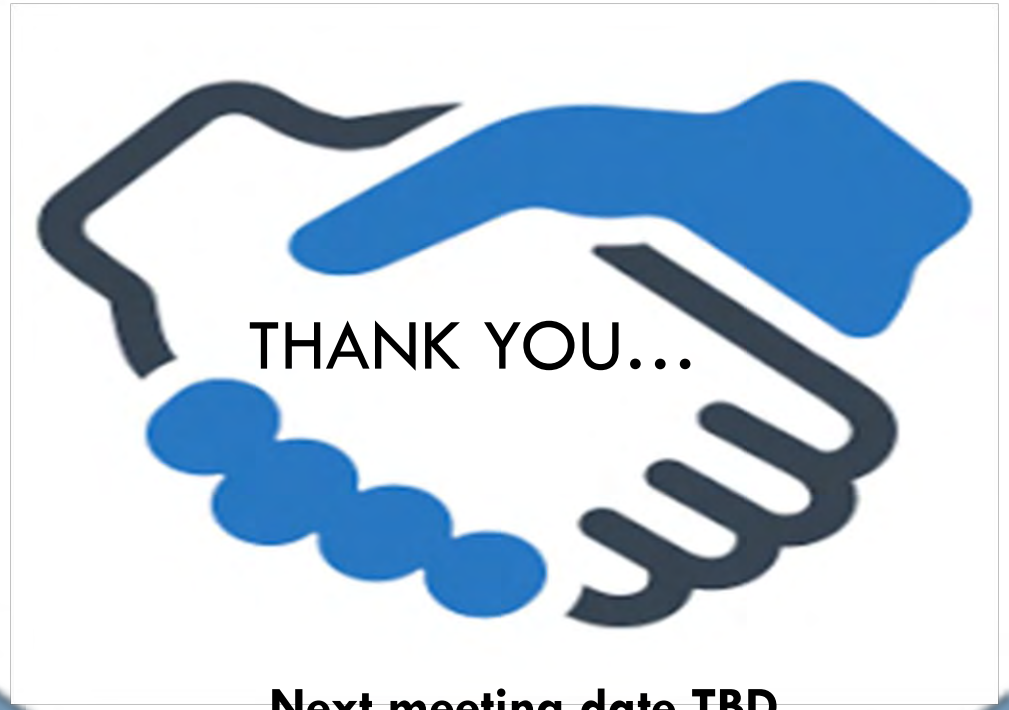
- HIGH BALANCE REVIEW

High Balance Evaluation >$3000			
	Paid in August or September	35	**Evaluated: Usage history patterns, leaks, balance transfers, catch up bills, etc.*
	No payment since July	21	
	No payment since April or earlier	20	
**14 provided grants up to $500 with notice on 10/1*			

- CONSUMPTION & PAYMENT EVALUATION
  - 2 X YEAR (PAUSED DUE TO COVID)
  - USAGE NOTIFICATION & CONSERVATIONS TIPS AT 6 MONTHS
  - AVERAGE PAYMENT RECALCULATED ANNUALLY WITH 30 DAY NOTICE

ADDITIONAL UPDATES

- GRANT PROGRAM
- PROGRAM DONATIONS
- OTHER…



Next meeting date TBD

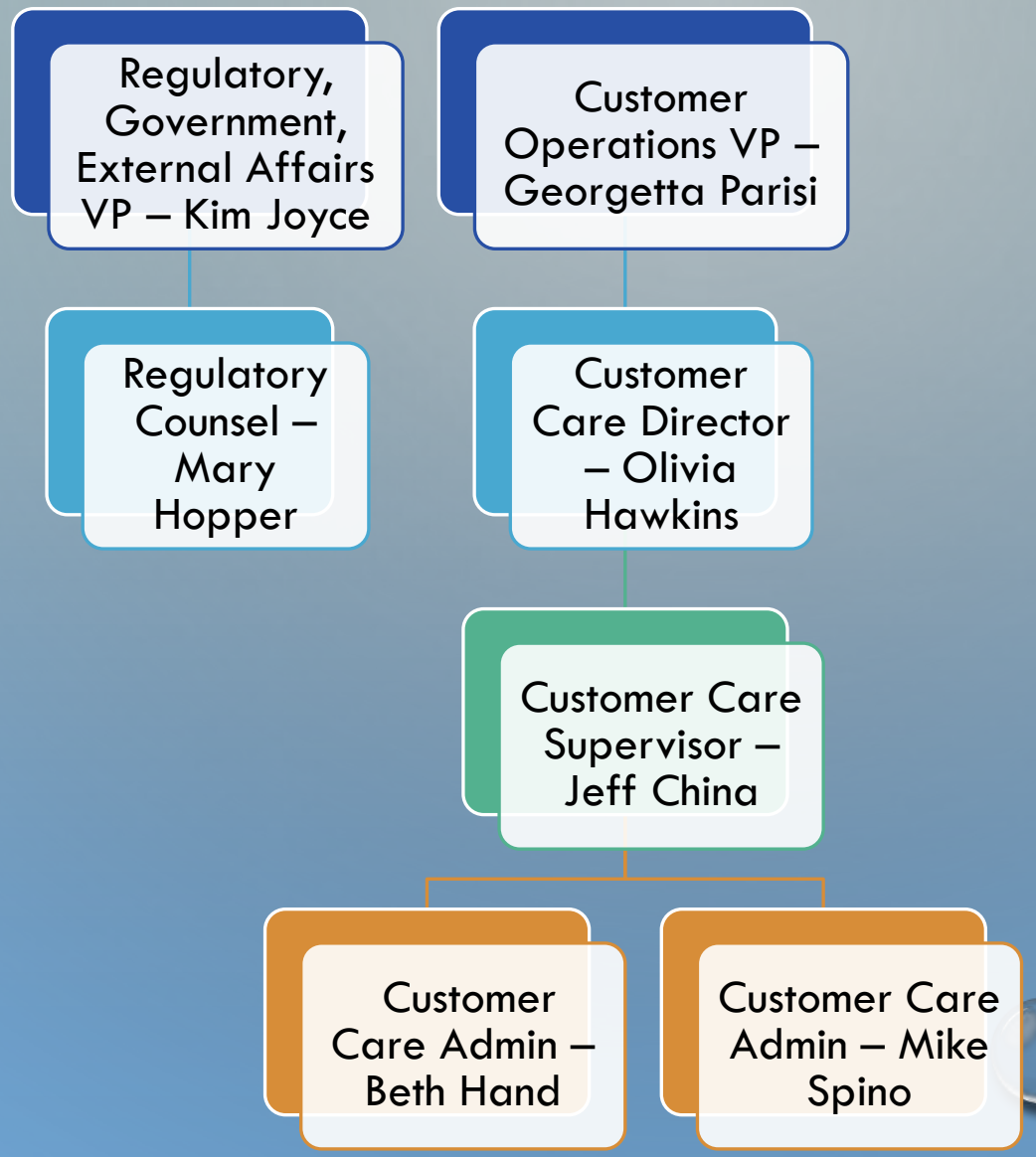
HELPING HAND COLLABORATIVE MEETING I

AUGUST 2019

AGENDA

- WELCOME
- HELPING HAND PROGRAM
- DOMESTIC VIOLENCE POLICY
- MEDICAL CERTIFICATIONS
- TERMINATION NOTICES

AQUA STAFF


Regulatory, Government, External Affairs VP – Kim Joyce
Customer Operations VP – Georgetta Parisi
Regulatory Counsel – Mary Hopper
Customer Care Director – Olivia Hawkins
Customer Care Supervisor – Jeff China
Customer Care Admin – Beth Hand
Customer Care Admin – Mike Spino

EXISTING HELPING HAND PROGRAM

Customer informs Aqua of payment troubles…

→

Aqua Refers Customer to Local Helping Hand Agency…

→

Customer Qualifies for Helping Hand Program…

→

Customer Participates Successfully…

Current enrollment as of July 2019 = 152 customers

HELPING HAND PROGRAM ENHANCEMENTS

COMPANY CONTRIBUTIONS:

- FUND $125K/YEAR THRU 2021 OR NEXT BASE RATE CASE FILING
  - EXCESS ROLLOVER ANNUALLY
  - AVAILABLE FOR GRANT PROGRAM
  - AVAILABLE FOR ARREARAGE FORGIVENESS
- CONTINUE PROMOTE AWARENESS
  - TO CUSTOMERS
  - TO LOCAL AGENCIES
- CONSIDER NEW PROMOTIONS
  - COMPANY SOCIAL MEDIA
  - COMPANY WEBSITE
- CONTINUE TO SEEK CUSTOMER CONTRIBUTIONS

HELPING HAND PROGRAM ENHANCEMENTS

- UP FRONT PAYMENT:
  - ELIMINATE CURRENT "GOOD FAITH" REQUIREMENT (AUG. 2019)
- MONTHLY PAYMENTS:
  - ELIMINATE CURRENT ARREARS PAYMENT (AUG. 2019)
  - DETERMINE NEW MONTHLY PAYMENT
- ARREARAGE FORGIVENESS:
  - INCREASE MONTHLY AMOUNT TO $25 (AUG. 2019)
- TRANSITION EXISTING HH CUSTOMERS TO NEW PROGRAM

HELPING HAND PROGRAM ENHANCEMENTS

NEW MONTHLY PAYMENT:

- AVERAGE MONTHLY PAYMENT BASED ON CUSTOMER USAGE HISTORY
- ACCOUNTS REVIEWED 2X YEAR TO EVALUATE CUSTOMER USAGE
- PAYMENT ADJUSTED BASED ON CUSTOMER USAGE OF 10% OR GREATER
- CUSTOMER NOTIFIED OF PAYMENT ADJUSTMENTS GOING FORWARD
  - INCREASE IN USAGE = INCREASE OF ARREARAGE BALANCE/MO. PAYMENT
  - DECREASE IN USAGE = DECREASE OF ARREARAGE BALANCE/MO. PAYMENT

EVALUATION OF EXTREMELY HIGH USAGE ACCOUNTS TO BE DETERMINED

HELPING HAND PROGRAM

REPORTING FEASIBILITY:

- # OF ESTIMATED LOW INCOME CUSTOMERS…. NOT AT THIS TIME
  - AND CONFIRMED LOW INCOME CUSTOMERS… YES *(15,849)*
- # OF CONFIRMED LOW INCOME CUSTOMERS W/ ARREARS … YES *(15,849)*
  - AND AVERAGE AMOUNT OF ARREARS … YES *($344.11)*
- AVERAGE MONTHLY BILL AMOUNT OF CONFIRMED LOW INCOME CUSTOMERS … YES *($75.65)*
- AMOUNT OF ARREARAGE FOR CUSTOMERS ENTERING HELPING HAND… YES *($1,028.88)*
- TERMINATIONS FOR NONPAYMENT OF CONFIRMED LOW INCOME CUSTOMERS… YES *(2141)*
  - *LOW INCOME CUSTOMERS W/ SHUT OFF NON-PAYMENT FROM 6/1/18 – 5/31/19*
- NUMBER AND AMOUNT OF HARDSHIP GRANTS DISBURSED… NOT AT THIS TIME

DOMESTIC VIOLENCE POLICY

- PFA PROCEDURES DOCUMENTED AND READILY AVAILABLE TO CSR'S
- VICTIMS ALLOWED 3 DAYS TO PROVIDE COPY OF ORDER BEFORE TERMINATION
- PAYMENT ARRANGEMENT RULES CLEARLY DEFINED AND AVAILABLE TO VICTIMS

#3. CSR will cancel open SONP service order and place an7 day hold on account.

#6a. If contact person is liable for services rendered (account is currently in this person name)

1. Verify income and establish PARR following PFA conditions:
   - * Include catch up amount
   - * Extend beyond 60 months, if necessary
   - * Minimum payment $15 per month

AQUA Protection from Abuse (PFA) Procedures

When Aqua receives notification or if the customer discloses they have an active PFA, the following steps will take place, if customer resides PA:

Note: The below process below pertains to PA only. Such inquiries for all other states should be addressed with normal procedures.

1. CSR will confirm the best contact information and ask for one of the following:
   a) Submit PFA document via the contact Aqua section of the Customer Service Center on the Aqua website https://www.aquaamerica.com/customer-service-center/contact-aqua.aspx
   b) Email PFA document to custservreply@aquaamerica.com
      a. PFA inquiries or documents received in ACO will be sent here.
   c) Postal mail PFA document to the attention of "PFA" at Call Center location of Rep taking the call.
2. CSR will create or amend PFA Note with the information and place *7 day hold on account.
   ** This hold is to allow time to receive documentation (if mailed) and complete appropriate transaction.*
3. CSR will cancel open SONP service order and place 7 day hold on account.
4. Upon receipt of PFA documentation, Email Administrative support will scan and send documentation to QTTeam@aquaamerica.com with "PFA documentation received" as subject.
   a) Quality Team will save PFA information received.
5. Within 24 hours of receiving PFA documentation, E-mail Administrative Support Representative will communicate with contact person to inform them of receipt of paperwork and to complete the transaction.
6. To complete the transaction, E-mail Administrative Support Representative will determine:
   a) If contact person is liable for services rendered (account is currently in this person name):
      1. Verify income and establish PARR following PFA conditions:
         - Include catch up amount
         - Extend beyond 60 months, if necessary
         - Minimum $15 per month
      2. Amend PFA note on account indicating receipt of documentation:
         - Include start and end date of PFA
   b) If contact person is not liable for services rendered (account is not in this person name):
      1. Research database and establish an account for contact person.
         - Move in effective date of PFA
      2. Add PFA note to this account indicating receipt of documentation:
         - Include start and end date of PFA
7. Email Administrative Support Representative will update PFA note with receipt of documentation, account status, and expiration date.

   Collection Notice /Restoration Requirements:
8. Email Administrative Support Representative will enter an "O" type hold on the account set to expire the same date as the PFA. This will omit the PFA customers from standard delinquency requirements.

MEDICAL CERTIFICATION

- MEDICAL CERTIFICATION FORM EDITED TO INCLUDE SIGNATURE REFERENCE FOR A PHYSICIAN, PHYSICIAN'S ASSISTANT, OR NURSE PRACTITIONER…

PHYSICIAN / NURSE PRACTITIONER / PHYSICIAN'S ASSISTANT INFORMATION

A licensed physician, nurse practitioner, or physician's assistant should complete this section, only after the patient whose name appears hereon has been personally examined and you have determined that the patient's medical condition will be aggravated by the cessation of service.

MEDICAL CERTIFICATE AQUA

CUSTOMER/PATIENT INFORMATION

ACCOUNT NO. (For Aqua use only)

CUSTOMER OF RECORD	CUSTOMER'S PHONE NUMBER(S)	
CUSTOMER'S SERVICE ADDRESS		
CITY	STATE	ZIP CODE

PHYSICIAN / NURSE PRACTITIONER / PHYSICIAN'S ASSISTANT INFORMATION

A licensed physician, nurse practitioner, or physician's assistant should complete this section, only after the patient whose name appears hereon has been personally examined and you have determined that the patient's medical condition will be aggravated by the cessation of service.

PATIENT'S NAME	PATIENT'S RELATIONSHIP TO CUSTOMER OF RECORD
PATIENT'S ADDRESS	

PHYSICIAN'S / NURSE PRACTIONER'S / PHYSICIAN'S ASSISTANT NAME (Print)

PHYSICIAN'S / NURSE PRACTIONER'S / PHYSICIAN'S ASSISTANT

OFFICE PHONE NO.	FAX NO.

It is my professional opinion that the patient's medical condition will be aggravated by the cessation of service within the next 30 days.

PHYSICIAN'S / NURSE PRACTIONER'S / PHYSICIAN'S ASSISTANT SIGNATURE	DATE

IMPORTANT NOTIFICATIONS:
In addition to this form a medical certificate can also be a note or letter written by a medical professional, so long as it includes the required content and the certifying medical professional's signature.

A valid medical certificate is good for ***thirty (30) days***. Once we determine we have received a valid medical certificate, Aqua will not shut off the water for non-payment for those 30 days. Payment of past due charges and/or payment arrangements (if eligible) are required in order to prevent collection activity at the end of the 30 day period. This form is void if modified or altered.

AQUA MUST RECEIVE THIS COMPLETED FORM WITHIN 3 BUSINESS DAYS. MAIL OR FAX TO:

FAX NUMBER: 866-780-8301	OFFICE ADDRESS: 762 W. Lancaster Avenue Attention: Collections Bryn Mawr, PA 19010
PHONE: 1-877-987-2782	HOURS: 7:30 a.m. – 5:00 p.m.

TO BE COMPLETED BY COMPANY REPRESENTATIVE ONLY

1st CERT	2nd CERT	3rd CERT

7/31/19

TERMINATION NOTICES

- REFERENCES TO SECURITY DEPOSITS REMOVED
- LANGUAGE AMENDED RELATED TO DOMESTIC VIOLENCE

10-Day Shut Off Notice

DATE NOTICE ISSUED:

Name:

Service Address:

Premise No:

In order for Aqua Pennsylvania, Inc. to continue supplying water service to your residence/business, you need to take immediate action. If the information ***marked*** below is not provided within the next 10 days, we will shut off the water service at the above address on or after 8:00 A.M. on _____ **Aqua may act on this notice for up to 60 days.**

THIS ACTION WILL BE TAKEN FOR THE FOLLOWING REASON:

1. **Your Bill For $ _____ is Overdue. Call 1.877.987.2782 (and choose Collections).**

2. **Meter Operations:**
   - ❑ Electrical Hazard
   - ❑ Inspect or Repair Meter Equipment
   - ❑ Incorrect or No Meter Space
   - ❑ Install Meter
   - ❑ Exchange Meter
   - ❑ Apply for Water Service

   Other: _____ **Call 1.877.WTR.AQUA or 1.877.987.2782.**

3. **Backflow Prevention:**
   - ❑ Failure to Test Backflow Device
   - ❑ Failure to Install Backflow Device **Call 610.541.4179 or Email backflow@aquaamerica.com**

TO STOP THE SHUT OFF, YOU MUST DO THE FOLLOWING AT ONCE:

- Pay the total amount due or call 1.877.WTR.AQUA or 1.877.987.2782 (and choose Collections) to request a payment arrangement, let us know that you made the payment, or dispute the overdue bill. If we shut off your water, you may have to pay the following charges to have your water turned back on: Overdue Amount $ _____ Turn On Charge $ _____. **Payments will not be accepted by our representative.**
  It must be paid at an authorized payment location (call Aqua for the nearest payment location's address)
- Allow access by an Authorized Aqua Service Representative for inspection, installation or replacement of the existing meter equipment at the property. Call 1.877.987.2782 to schedule an appointment.
- Call 1.877.WTR.AQUA or 1.877.987.2782 (and choose Collections) if you or someone in your home has a serious illness or a medical condition. Read the Medical Emergency Notice shown (on the back).
- Comunicarse con Aqua al 877.987.2782 (elija "Bobranzas" o "Collectiones" en inglés para hacernos saber que realizó el pago, o para disputar el balance atrasado. También puede communicarse con Aqua a la dirección que aparece arriba
- Attencion! Este es en mensaje muy importante. Si usted no lo entiende, favor de llama a 877.987.2782.

If you have any questions or need more information, please call us. 877.987.2782. If you are not satisfied after you talk to us, you may file a complaint with the Public Utility Commission by calling 1.800.692.7380 toll free, or by writing to P.O. Box 3265 Harrisburg, PA 17105-3265. The Public Utility Commission will delay the shut off if you file a complaint before the shut off date.

AQUA

762 W. Lancaster Avenue
Bryn Mawr, PA 19010-3489

PA-B-265 REV 0619

IMPORTANT TO KNOW - BEFORE WE SHUT OFF YOUR UTILITY SERVICE

- **If we shut off your service during the winter months (between Dec. 1 - Mar. 31)** we will restore your service within 24 hours of your meeting all requirements/conditions to have service reconnected. Where street digging is required it may take up to 7 days.
- If you are a victim of domestic violence and have a Protection From Abuse Order (PFA) or other court order that shows clear evidence of domestic violence, there are special protections available. **Call us immediately at 877.987.2782.** (You will be required to provide us with a copy of the order.)
- You may be eligible for a payment agreement or special assistance programs. **Call 877.987.2782 right away** to provide us with household income and occupant information. Documentation of your income may be required, such as pay stubs or tax documents.
- If your landlord pays your utility bill: You have certain legal protections. Please call us at 877.987.2782.
- If you have trouble understanding or speaking English or have a disability please call us at 877.987.2782 for free interpretation.
- If your service is shut off, you may be required to pay more than the amount listed on the front of this notice to have your service turned back on. You may have to pay any additional bills that have become past due.
- All adult occupants of the premise whose name appears on the mortgage, deed, or lease are considered "customers" and are responsible for payment of this bill.
- If service is shut off, ANY adult occupant who has been living at the premise may have to pay all or portions of this bill to have service restored.
- If your service is shut off, you must contact us after your payment has been made to be sure you have met all conditions to have the service turned back on and to arrange access to your premise.
- After all conditions have been met to have the service turned back on, it may take up to 7 days to have your service restored. Please contact us to discuss the details.
- If you need water to heat your property, please contact Aqua immediately at 877.987.2782 (and choose Collections) so we can arrange a service visit to verify that need. The company will act in accordance with the public utility laws with respect to water service shut offs.

MEDICAL EMERGENCY NOTICE

Let us know if someone living in your home is seriously ill or has a medical condition.
WE WILL NOT SHUT OFF YOUR SERVICE provided you:

A. Provide a medical certification by a licensed physician, nurse practitioner or physician's assistant. Medical certifications must be in writing and signed by your physician, nurse practitioner or physician's assistant by fax, email or mail within three days.

AND

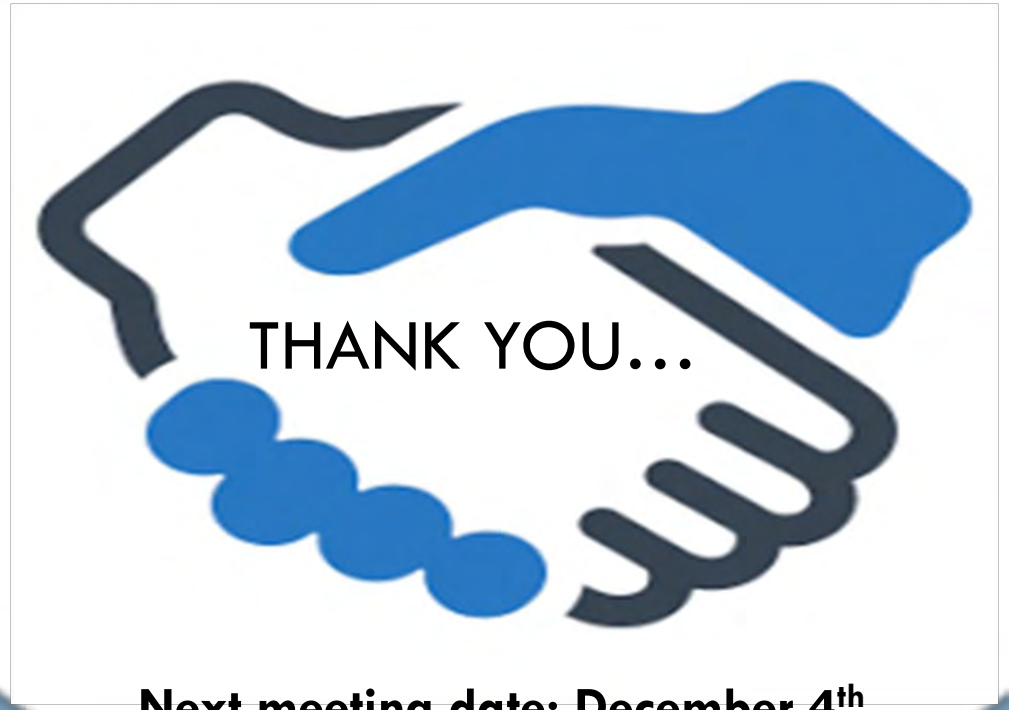
B. Make some equitable arrangements to pay your current bills for service.

Call **Aqua at 877.987.2782** to let us know about your medical emergency.

FAX: 610.520.2168 or toll-free at 866.780.8301

Address: ATTN: Collections Department, Aqua Pennsylvania, Inc.
762 W. Lancaster Avenue
Bryn Mawr, PA 19010

- If you are a victim of domestic violence and have a Protection From Abuse Order (PFA) or other court order that shows clear evidence of domestic violence, there are special protections available.



Next meeting date: December 4th

Witness: Georgetta Parisi-Knup
Date: 10/11/2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

OFFICE OF CONSUMER ADVOCATE

DATA REQUEST SET V

DOCKET NOS. R-2021-3027385 & R-2021-3027386

OCA-V-9: In an Excel spreadsheet, disaggregating by water, wastewater, and combined water/wastewater service provided, by year, for each year 2018 to present, by Federal Poverty Level (if available, if not, for total program), please provide the average income for all participants with wage/salary income for the Helping Hands arrearage forgiveness program.

RESPONSE: See electronic attachment 'Confidential OCA-V-9.xlsx' for details. Data for both FPL and service disaggregation is not readily available.

OCA-V-9	2018	2019	2020	2021(Sept.)
Average Employment Income	$764.00	$954.33	$250.00	$1,200.00

Witness: Georgetta Parisi-Knup
Date: October 13, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

OFFICE OF CONSUMER ADVOCATE

DATA REQUEST SET V

DOCKET NOS. R-2021-3027385 & R-2021-3027386

OCA-V-19: Please provide sample of all "targeted outreach" delivered to customers promoting the Helping Hands arrearage forgiveness or otherwise seeking to identify low-income customers since December 2019.

RESPONSE: See attachments OCA-V-19(1) and OCA-V-19(2). Outreach is targeted to all customers in the Aqua PA service area.

AQUA
An Essential Utilities Company

Press Release

For release: April 3, 2020

Contact:
Donna Alston
Mgr. Communications
M: 484.368.4720
DPAlston@AquaAmerica.com

Aqua Pennsylvania reminds low-income families there is help to pay water bills

BRYN MAWR, Pa. – Aqua Pennsylvania is reminding customers that its Helping Hand assistance program is available to low-income families who find it difficult to pay their water bills.

The Helping Hand program is multi-faceted, offering customers a payment plan to pay down arrears and ensure their water isn't turned off; an opportunity for customers who make payments on time to earn a monthly credit toward their arrears; and a conservation kit to help customers curb usage and therefore, reduce their bills. The conservation kit includes leak-detection tablets, a low-flow shower head, low-flow aerators for kitchen faucets, and more. Customers who reduce their usage are also reducing their bills.

Interested customers can call Aqua at 877.987.2782 to find out if they qualify for Helping Hand. Aqua will refer eligible customers to a local agency to apply.

The following requirements are among those that must be met for eligibility:

- The customer's household income is less than 200 percent of the federal poverty level;
- the account is more than 21 days past due; and
- the customer has at least $110 in unpaid water bills.

Customers who wish to contribute to the Helping Hand program may also call Aqua at 877.987.2782 or log on to AquaAmerica.com.

Aqua Pennsylvania serves approximately 1.4 million people in 32 counties throughout the Commonwealth of Pennsylvania. Visit AquaAmerica.com for more information, or follow Aqua on Facebook at facebook.com/MyAquaAmerica and on Twitter at @MyAquaAmerica.

# # #

For release: April 28, 2021

Contact: Gretchen Toner
484.368.4816
GMToner@AquaAmerica.com

Aqua Pennsylvania reminds low-income families there is help to pay water bills

BRYN MAWR, Pa. – Aqua Pennsylvania is reminding customers that its Helping Hand assistance program is available to low-income families who find it difficult to pay their water bills.

The Helping Hand program is multifaceted, offering customers a payment plan to pay down arrears and ensure their water isn't turned off; an opportunity for customers who make payments on time to earn a monthly credit toward their arrears; and a conservation kit to help customers reduce usage and, therefore, reduce their bills. The conservation kit includes leak-detection tablets, a low-flow shower head, low-flow aerators for kitchen faucets and more.

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Aqua Pennsylvania serves approximately 1.4 million people in 32 counties throughout the Commonwealth of Pennsylvania. Visit AquaAmerica.com for more information, or follow Aqua on Facebook at facebook.com/MyAquaAmerica and on Twitter at @MyAquaAmerica.

# # #

For release: Dec. 16, 2019

Contact: Donna Alston
O: 610.645.1095
M: 484.368.4720
DPAlston@AquaAmerica.com

Aqua Pennsylvania reminds low-income families there is help to pay water bills

BRYN MAWR, Pa. – Aqua Pennsylvania is reminding customers that its Helping Hand assistance program is available to low-income families who find it difficult to pay their water bills.

The Helping Hand program is multi-faceted, offering customers a payment plan to pay down arrears and ensure their water isn't turned off; an opportunity for customers who make payments on time to earn a monthly credit toward their arrears; and a conservation kit to help customers curb usage and therefore, reduce their bills. The conservation kit includes leak-detection tablets, a low-flow shower head, low-flow aerators for kitchen faucets, and more. Customers who reduce their usage are also reducing their bills.

Interested customers can call Aqua at 877.987.2782 to find out if they qualify for Helping Hand. Aqua will refer eligible customers to a local agency to apply.

The following requirements are among those that must be met for eligibility:

- The customer's household income is less than 200 percent of the federal poverty level;
- the account is more than 21 days past due; and
- the customer has at least $110 in unpaid water bills.

Customers who wish to contribute to the Helping Hand program may also call Aqua at 877.987.2782 or log on to AquaAmerica.com.

Aqua Pennsylvania serves approximately 1.4 million people in 32 counties throughout the Commonwealth of Pennsylvania. Visit AquaAmerica.com for more information, or follow Aqua on Facebook at facebook.com/MyAquaAmerica and on Twitter at @MyAquaAmerica.

# # #

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Aqua
May 4 ·

Aqua Pennsylvania's Helping Hand program is available to low-income families who find it difficult to pay their water bills. The program offers customers a payment plan to pay down arrears ensuring their water isn't turned off.

To find out if you qualify for the Helping Hand program please call 877.987.2782. Learn more at: https://bddy.me/2QSyQj6

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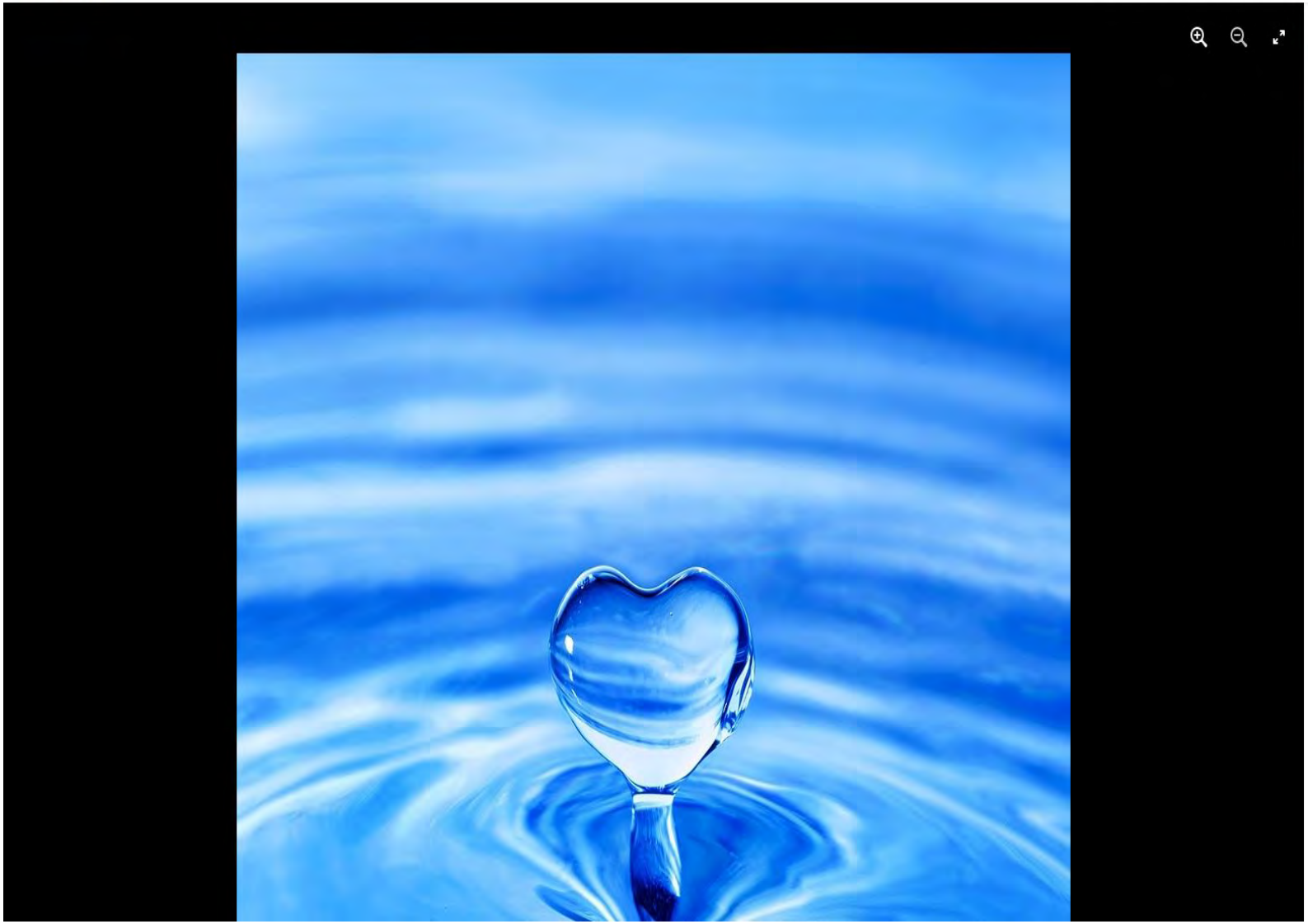

Aqua
July 6, 2020 ·

Are you an Aqua Pennsylvania customer experiencing financial difficulties during this time? Learn about our Helping Hand assistance program: https://bit.ly/2YyjJfD

7

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Helping Hand Video.mp4

Aqua
June 3

Aqua offers various customer assistance programs for those experiencing difficulty paying their water and wastewater bills. Hear from Aqua Vice President of Customer Operations, Georgetta Parisi, on FOX56 WOLF TV about one of our programs, Helping Hand.

For more information on the helping hand program, please visit https://bddy.me/2Rm0XYg

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https://www.facebook.com/MyAquaAmerica/videos/869050090488275/

Aqua Blog Post
Helping Hand

Aqua Pennsylvania is Lending a Hand to Customers

As COVID-19 continues to financially impact businesses and families in our communities, Aqua Pennsylvania is reminding customers that its Helping Hand assistance program is available to help those whose finances are affected by the pandemic.

The Helping Hand program is an assistance program designed to enable customers facing financial difficulty to make manageable monthly payments on their water and wastewater bills. This program is a resource for customers if they are having trouble paying their water and wastewater bills due to COVID-19.

"At Aqua, we know how important water and wastewater services are to meet our customers' needs," said Aqua Pennsylvania President Marc Lucca. "As COVID-19 continues to impact our everyday lives, we want our customers and communities to know that Aqua is here to assist through the Helping Hand program. We are here to offer our support and we will get through this together."

The program helps customers set up an individualize payment plan; an opportunity for customers who make payments on time to earn a monthly credit toward their past-due balances; and a conservation kit to help customers reduce water usage to lower bills. The conservation kit includes leak-detection tablets, a low-flow shower head, low-flow aerators for kitchen faucets and more.

Aqua Pennsylvania will partner eligible customers with a local agency to develop a personal payment plan. In this plan, a customer will pay a fixed monthly payment based on average bills for the preceding 12-month period. Specific Helping Hand partner agencies can be found on our website.

Customers whose household income meet the criteria below are eligible to participate in Helping Hand:

$25,529 individuals	$61,360 for a family of 5
$34, 480 for a family of 2	$70, 320 for a family of 6
$43,440 for a family of 3	$79,280 for a fmaily of 7
$52,400 for a family of 4	$88,240 for a family of 8

*For a limited time, new Helping Hand participants receive an $25 enrollment credit. Aqua Pennsylvania wants customers to know the company is here to help and that applying to Helping Hand is easier than ever. Customers who would like to learn more about the program and to find out if they qualify can call: 877.987.2782.

Customers who would like to lend a hand to their friends and neighbors, can donate to the Helping Hand program by calling Aqua and asking how they can contribute to the assistance program.

Our company takes pride in protecting and providing water and wastewater services to the communities where we live and work and we are ready to assist customers during this time. To learn more about Helping Hand, visit aquaamerica.com/assist.

May 21, 2020

Customer Name
Service Mailing Address
City, State Zip

Re: Helping Hand COVID-19 Assistance
Aqua Account# 000000000-0000000

Dear valued customer,

Congratulations! You have been awarded Helping Hand COVID 19 assistance, which provides you a forgiveness credit towards your past due balance. We are pleased to be able to assist you during this very challenging time in the country. The amount of assistance provided will be reflected on your billing statement.

Thank you for being an Aqua customer! You can learn more about our Helping Hand Program at www.aquaamerica.com/assist or by contacting our Customer Service Department at 1-877-987-2782.

Sincerely,

Jeff China
Helping Hand Program Supervisor
Aqua Pennsylvania

Call these agencies to learn how you can enroll in Helping Hand.

Delaware County
Community Action Agency of Delaware County
1414 Meetinghouse Road, Boothwyn, PA 19061
610.874.8451

Montgomery County
Community Action Development Commission
113 East Main Street, Norristown, PA 19401
610.277.6363

Northumberland County
Central Susquehanna Opportunities, Inc.
2 East Arch Street, Shamokin, PA 17872
570.644.6575

For all other Pennsylvania counties and for questions contact:
EBO Solutions, LLC A Division of NRA Group, LLC
2491 Paxton Street, Harrisburg, PA 17111
800.360.2998

AQUA℠

/MyAquaAmerica

@MyAquaAmerica

AquaAmerica.com

Helping Hand

A low-income assistance program.

AQUA℠

Helping Hand is Aqua Pennsylvania's low-income assistance program designed to enable low-income customers to make manageable monthly payments on their water and wastewater bills.

Customers who make timely payments through Helping Hand receive a monthly credit to their accounts. The program provides customers with water conservation kits that provide customers with information and tools on how to use less water.

Am I eligible for Helping Hand?

Customers who meet all three criteria below are eligible to participate in Helping Hand.

1. Household income is less than 200 percent of the federal poverty level
2. Account is more than 21 days past due
3. Customer has at least $110 in unpaid water bills

How do I sign up for Helping Hand?

If you think you might be eligible for Helping Hand, call 800.360.2998 or the agency listed on the back panel of this brochure that is closest to your residence. If you are unsure which agency to call, please call Aqua at 877.987.2782.

If you are eligible for Helping Hand, Aqua will work with the referring agency to develop a payment plan for you. In this plan a customer would pay a fixed monthly payment based on average bills for the preceding 12-month period.

Helping Hand rewards customers who make timely payments with a credit to their account.

First-time Helping Hand customers also receive a complimentary water conservation kit with information about how to detect and fix leaks and identify and make minor plumbing repairs that can help reduce consumption. The kit includes:

- Leak detection tablets and tips on detecting and fixing leaks
- A low-flow shower head
- Faucet aerators

How can I give others a Helping Hand?

If you don't need the assistance of Helping Hand, but want to help others who do, please complete the form below with the amount of your tax-deductible donation and include it with your regular water/sewer bill payment. Your donation will go towards water/sewer bill credits for customers who are less fortunate.

☐ I authorize Aqua to add the amount below to each of my water/sewer bills. (These deductions will continue until you call 877.987.2782 to request that they stop.)

☐ $5 ☐ $10 ☐ $15 ☐ Other $ _____

☐ I would like to make a lump-sum donation to Helping hand. Please make checks payable to Aqua Pennsylvania with "Helping Hand" in the memo section.

Name _____

Address _____

Aqua Account # _____

Please fold and include this form with your donation in the envelope along with your Aqua bill payment.

AQUA℠

AQUA
An Essential Utilities Company

Aqua Pennsylvania
762 Lancaster Ave
Bryn Mawr, PA 19010

NEW!
For a limited time, all new Helping Hand participants will receive a $25 enrollment credit — in addition to monthly credits!

As COVID-19 continues to financially impact businesses and families in our communities, Aqua Pennsylvania is reminding customers about Helping Hand, an assistance program to help customers make manageable monthly payments on their water and wastewater bills.

Helping Hand lets customers earn a monthly credit toward their past-due balances, and includes a conservation kit to help customers reduce water usage to lower bills.

Eligible customers include those with a household income less than:

$25,520 for individuals	**$61,360** for a family of 5
$34,480 for a family of 2	**$70,320** for a family of 6
$43,440 for a family of 3	**$79,280** for a family of 7
$52,400 for a family of 4	**$88,240** for a family of 8

If you or someone you know could benefit from the Helping Hand program, signing up is easier than ever. Call **877.987.2782**. You can learn more information at **aquaamerica.com/assist**, including information about local partnering organizations.

Witness: Georgetta Parisi-Knup
Date: October 13, 2021

AQUA PENNSYLVANIA, INC.
AQUA PENNSYLVANIA WASTEWATER, INC.

OFFICE OF CONSUMER ADVOCATE

DATA REQUEST SET V

DOCKET NOS. R-2021-3027385 & R-2021-3027386

OCA-V-20: Please identify all criteria used to "target" the outreach provided in response to the immediately preceding question.

RESPONSE: Increased HH program participation was the goal and the criteria used for accomplishment was as follows:

- Aggressively campaign to entire customer base:
  - Social media
  - Direct mail
  - Agencies
  - Employees blog
  - Leadership communication
- Modify program requirements
- Offer enrollment credit
- Update credit code to reflect on customer bill
- Implement ability for CSR's to issue credits (grants)
- Update procedures and Website
- Identify and analyze low income customer base (See attachment OCA-V-20).
- Introduce tiered forgiveness credits

Low Income Analysis

County	Delaware	# of conn	Chester	# of conn	Northumberland	# of conn	Luzerne	# of conn	Schuylkill County	# of conn	Mercer county	# of conn	Pike County	# of conn
% impoverished	7.30%	63,069	5%	12,851	8.05%	5,631	8.73%	2,470	6.67%	1,015	6.85%	6,097	5.30%	4,355

VERIFICATION

I, Harry Geller hereby state that the facts set forth in CAUSE-PA St. 1, the Direct Testimony of Harry Geller, 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 held in this matter. I understand that the statements made herein are subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsifications to authorities.)

November 10, 2021
Date

Signature