



VIA E-FILING

July 14, 2022

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265

**RE: PA Public Utility Commission v. Aqua Pennsylvania, Inc.
Docket No. R-2021-3027385
PA Public Utility Commission v. Aqua Pennsylvania Wastewater, Inc.
Docket No. R-2021-3027386**

Dear Secretary Chiavetta:

In accordance with Ordering Paragraph 23 of the Pennsylvania Public Utility Commission's ("Commission") Opinion and Order entered May 15, 2022 at the above referenced dockets, Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc. (collectively "Aqua") submits its Income Verification and Recertification Plan written plan for income documentation required to participate in its customer assistance program. Enclosed please find the verification of Rita F. Black.

If you have any questions regarding this notice, please contact me at 610-645-1170.

Sincerely,

Mary McFall Hopper

Mary McFall Hopper
Regulatory Counsel

cc: Certificate of Service

Enclosure

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

PA Public Utility Commission v. Aqua Pennsylvania, Inc.	: : :	Docket No. R-2021-3027385
PA Public Utility Commission v. Aqua Pennsylvania Wastewater, Inc.	: :	Docket No. R-2021-3027386

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing document upon the individuals and in the manner listed below, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL

Scott B. Granger, Esquire
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265
sgranger@pa.gov

John W. Sweet, Esquire
Ria M. Pereira, Esquire
Elizabeth R. Marx, Esquire
Lauren Berman, Esquire
Pennsylvania Utility Law Project
118 Locust Street
Harrisburg, PA 17101
PULP@pautilitylawproject.org

Christine Maloni Hoover, Esquire
Erin L. Gannon, Esquire
Harrison Breitman, Esquire
Christy M. Appleby, Esquire
Lauren E. Guerra, Esquire
Mackenzie C. Battle, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
choover@paoca.org
egannon@paoca.org
hbreitman@paoca.org
cappleby@paoca.org
lguerra@paoca.org
mbattle@paoca.org

Adeolu A. Bakare, Esquire
Charis Mincavage, Esquire
McNees Wallace & Nurick LLC
100 Pine Street
P.O. Box 1166
Harrisburg, PA 17108-1166
Abakare@mcneeslaw.com
Cmincavage@mcneeslaw.com
Counsel for Aqua Large Users Group

Steven C. Gray, Esquire
Office of Small Business Advocate
555 Walnut Street
Forum Place, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov

George A. Bibikos, Esquire
GA BIBIKOS LLC
5901 Jonestown Road, Suite 6330
Harrisburg, PA 17112
gbibikos@gabibikos.com

Richard J. Gage
120 Treaty Drive
Wayne, PA 19087
brittagage@aol.com

Francine Weiner
1903 2nd Street
Langhorne, PA 19047
fhwhome@gmail.com

John Day
614 Runyon Avenue
Piscataway, NJ 08854
john@johnday.us

Mary McFall Hopper

Mary McFall Hopper

Dated: July 14, 2022

Aqua PA – Income Verification and Recertification Plan – July 2022

Income Verification

As noted in the Commission’s Order¹, Aqua will implement an income verification requirement to its Customer Assistance Program (“CAP”) to qualify customers for participation. In addition to requiring income verification to enroll in the program, Aqua will also implement a recertification process to ensure continued eligibility for participation. The income verification processes Aqua implements will be similar to those of Peoples Natural Gas.

Qualifying Income Documentation for Enrollment

Aqua plans to use Dollar Energy Fund as its CAP administrator. Dollar Energy Fund administers utility programs for many PA utilities including Peoples Natural Gas, Columbia Gas, Pennsylvania American Water and First Energy. Many of the participating utility CAPs require income verification and Dollar Energy Fund is well experienced in both evaluating income documents to determine program eligibility, as well as in document management of these confidential materials, utilizing its custom software and storage system. Customers may choose to submit monthly or annual income to qualify for the program. The annual/monthly option is similar to other assistance programs such as LIHEAP and LIHWAP allows customers to use documents that are most readily available to them and to provide documentation that is most representative of their current financial situation if there has been a recent negative change. To reduce barriers to participation and encourage customers to apply for available assistance, Aqua will accept proof of LIHWAP as sufficient income verification and will not require applicants that have received LIHWAP to provide any additional documentation to enroll.

Earned and unearned income of minor children is excluded in the determination of eligibility, in compliance with the definition of household income found at 66 Pa.C.S. §1403. The following guidelines will be used to evaluate submitted income:

- Income for all adult household members must be submitted.
- Customers without income may apply for participation through completion of the Zero Income Form.
- Acceptable forms of income documentation include:
 - Paystubs
 - Benefit award letters
 - Bank statements reflecting direct deposit of income
 - Income tax statements
 - Receipt of LIHWAP within 12 months of application

Recertification Timeframes

Aqua’s CAP participants will follow the same recertification timeframes as those of Peoples Natural Gas. Peoples received approval of its Universal Service and Energy Conservation Plan (USECP) on May 12, 2022. The following recertification guidelines were approved at that time:

- Customers who enrolled in CAP using the Zero Income Form will be required to recertify in 6 months.

¹ R-2021-3027385

- Customers who have enrolled on the basis of LIHWAP or whose household income is exclusively from certain fixed income types (pension, social security or disability) will recertify every three years.
- All other customers will be required to recertify once every two years.

Recertification Process

For customers that were enrolled using the Zero Income Form, recertification will be initiated through a phone call from Aqua, followed by a letter if two attempts at reaching the customer by phone are unsuccessful. If participating customers do not respond to the recertification efforts, they will be dismissed from the program. The letter will provide the phone number for Dollar Energy Fund.

For all other customers, 60 days prior to the recertification date, a letter will be sent to the customer advising it is time to update their income documentation to continue to participate in the program. If the customer fails to recertify, a second letter is sent 30 days prior to the recertification date advising the customer that if recertification is not completed within 30 days, the account will be dismissed from the program. Both letters will provide the phone number for Dollar Energy Fund.

Recertification will utilize the same income documentation requirements as enrollment. LIHWAP will be accepted as proof of continuing eligibility if it has been received within the past 12 months.

Income Submission Methods

Aqua is currently working with Dollar Energy Fund to prepare for the launch of its CAP program. It is Aqua's intention that customers will have multiple methods to submit income documentation including via US mail, email, fax and online application. While most methods will be readily available for use upon launch of the new Aqua CAP, some methods, such as the online application, may follow at a later date.

Aqua plans to meet with its stakeholder group to further discuss its plans for income documentation requirements, methods of income submission and recertification processes. Aqua will explore the option of accepting proof of utility CAP participation, such as electric or natural gas CAP, as acceptable verification of eligibility for enrollment with its stakeholders.



Zero Income Claim Form

Customer Information

Utility Co _____ Account # _____
First Name _____ Last Name _____
Address 1 _____
Address 2 _____
City _____ State _____ Zip _____

Household Zero Income Claim

I, _____, confirm/state that no adult member of
_____ (print name)

my household is currently receiving income from any source

Household Expenses

Identify how you and your household meet monthly living expenses, such as those expenses for housing (mortgage or rent), food, and utilities (electric, gas, water, and/or phone bill). Check all that apply.

_____ I am using money from savings
_____ I receive financial support from friends/family/community
_____ Other. Please explain below:

Affidavit

I certify that the information presented in this application is true and accurate to the best of my knowledge. I understand that providing false information in this application is grounds for denial and dismissal of my application. I acknowledge that I am responsible for notifying **Dollar Energy Fund** if my household or income information changes.

Signature _____ Date _____

VERIFICATION

I, Rita F. Black, Director, Community Assistance Programs, hereby state that the facts set forth in the foregoing letter dated July 14, 2022 at Docket No. R-2021-3027385 and R-2021-3027386 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 any hearing held in this matter. I understand that my statement herein is make subject to the penalties of 18 Pa. C.S.§4904 (relating to unsworn falsification to authorities).



Rita F. Black
Director, Community Assistance Programs
Essential Utilities, Inc.

Dated: July 14, 2022