

June 5, 2023

Via Electronic Filing

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

Re: 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs
Docket Nos. M-2023-3038944

Dear Secretary Chiavetta:

Enclosed for electronic filing please find The Pittsburgh Water and Sewer Authority's ("PWSA") Comments with regard to the above-referenced matter.

Sincerely



Deanne M. O'Dell

DMO/lww
Enclosure

cc: Gladys Brown Dutrieuille, Chairman
Stephen M. DeFrank, Vice Chairman
Ralph V. Yanora, Commissioner
Kathryn L. Zerfuss, Commissioner
John F. Coleman, Jr, Commissioner
Alexis Bechtel, Director, Bureau of Consumer Services

Secretarial Letter - Review of All Jurisdictional Fixed Utilities Universal Service Programs

Responses of The Pittsburgh Water and Sewer Authority ("PWSA")

Docket Number M-2023-3038944

- 1. What regulatory barriers are in place that would prevent utilities from having one utility do intake and then having that information provided to other utilities that provide service to that consumer for the purpose of universal service and CAP enrollment?**

Response: The Pittsburgh Water and Sewer Authority (PWSA) is unaware of any current regulatory barriers; in fact, PWSA has this working relationship with Duquesne Light Company (DLC) whose service territory overlaps with ours. PWSA proactively asks customers on our low income assistance program application to indicate whether or not they agree to share their contact and/or income information with other utilities for cross-enrolment purposes. We then share this data with DLC monthly via spreadsheets. Where the review of shared customer data can become more time-consuming is when utilities do not share entire service territories and, as a result, may share customer contact information for customers who are not in the partner utility's territory.

Outside of any regulatory barriers there are operational barriers to overcome, such as which technology application should be in use and whether all utilities can bear the cost of this technology.

- 2. What regulatory barriers or other obstacles exist if an outside provider does the intake on behalf of multiple utilities serving the consumer and what solutions exist to overcome any barriers?**

Response: In PWSA's experience, contracting with an external provider is costly. Additionally, the provider in PWSA's service territory is serving the needs of multiple traditionally regulated utilities, which yielded unmet PWSA community outreach expectations, untimely access to data, and lack of responses to reporting requests. Electing to employ our in-house PGH2O Cares team allows us to control costs, keeping in mind that all other ratepayers bear the cost of our assistance programs. In 2022, the Cares team promoted PWSA's low income programs at 85 virtual and in-person community events. The two most effective means of increasing enrolment in PWSA's assistance programs have been the online application at pgh2o.com and cold calls to customers by the Cares team. PGH2O Cares has more than doubled the enrolment numbers we achieved while under contract with our former outside provider.

- 3. How can consumer consent be built into the intake process that permits the utility doing the intake to provide the enrollment information to the other utilities serving the consumer?**

Response: See PWSA's response to Question #1.

- 4. Is an automatic enrollment program feasible where any mechanism through which an electronic exchange of information between a utility and a state social service agency confirms the eligibility of public benefits whether or not the information is expressly authorized by the household? If express authorization is needed, rather than automatic enrollment, can that express authorization be provided one time in a uniform application rather than on a utility-by-utility basis using separate applications?**

Response: Yes; similar to PWSA's response in #1, we are willing to work with more utilities/agencies to automate the enrolment process upon confirmation of income eligibility, *if* a customer has agreed to have their contact and/or income information shared with PWSA.

- 5. Should CAPs be administered statewide across all utility service territories rather than on a utility-by-utility basis? If so, what are the barriers to accomplishing this and what are the benefits and drawbacks to this approach? If not, what are the benefits and drawbacks of continuing to administer the programs on a utility-by-utility basis?**

Response: PWSA can support water utility specific guidance from the Commission but urges caution against attempting to craft specific operational and detailed requirements that all utilities must meet, particularly given the difference in utility services as well as each utility's historical experience with CAPs. PWSA's CAP programs have evolved over the past several years to meet the needs of the customers we serve and in consideration of stakeholder feedback in various litigated proceedings. Removing or modifying existing assistance programs through standardization may harm low income, residential customers who have come to rely on the current affordability measures to continue to receive services from their utility. Additionally, if standardized, the administration of assistance programs may remove autonomy from the utility, potentially resulting in higher costs to ratepayers.

6. What changes would be required to EDCs' and NGDCs' existing, Commission-approved universal service and energy conservation programs to incorporate improvements and could changes be addressed in a streamlined fashion?

Response: PWSA does not offer an opinion regarding revisions to the current universal service and energy conservation programs applicable to EDCs and NGDCs. To the extent the Commission elects to offer guidance for such programs to be offered by water/wastewater utilities, PWSA supports a collaborative process whereby the affected utilities can provide company specific input. Any directives that are imposed on water/wastewater utilities must also include the right of the water/wastewater utilities to full cost recovery for implementation of their universal service and energy conservation programs.

7. What additional consumer education and outreach could be undertaken to make more low-income consumers aware of the benefits that may be available to them?

Response: PWSA participates in the following education and outreach activities to promote enrolment in its customer assistance programs:

- a) Online application and website content at pgh2o.com
- b) Cold calling campaigns
- c) Neighborhood canvassing
- d) Door hangers with QR code to online application
- e) Bill inserts
- f) Bill messaging
- g) On hold messaging for customers in telephone queue
- h) In-person community/agency events
- i) Engagement with local elected officials
- j) Office hours at community centers and food banks
- k) Virtual community/agency events
- l) Virtual office hours
- m) Distribution of assistance program flyers in food boxes, at community centers, at the time of personal contact at termination, and upon request
- n) Translation of assistance program flyers into multiple languages
- o) Social media on Facebook, Twitter, and a paid Google Ad campaign
- p) Press releases to announce the launch of new program initiatives

Additional methods of outreach that PWSA has not yet embarked on would be text messaging and outbound automated calling campaigns to increase recertification efficiency.

In addition, PWSA would support partnering with the Commission and other agencies to embark upon a customer education program. Such a campaign could be structured similarly to the one used in 2012 whereby the EDCs produced and mailed a Commission-

endorsed postcard encouraging customers to shop for a competitive electric generation supplier. The postcard was designed by the Commission and was signed by the Commissioners. See

https://www.puc.pa.gov/electric/pdf/RetailMI/PAPS_Customer_Postcard-Final.pdf.

8. Can recertification periods in the existing CAP Policy Statement at Section 69.265(8)(viii) be extended so that otherwise eligible consumers do not lose benefits solely due to the fact that they timely failed to recertify their eligibility?

Response: While PWSA does not agree that the existing EDC and NGDC CAP Policy Statement should be applied to water/wastewater utilities to the extent the Commission elects to offer guidance for such programs to be offered by water/wastewater utilities, PWSA supports a collaborative process whereby the affected utilities can provide company specific input. That said, PWSA's recertification of low income customers after two years of program enrolment has proven to be manageable and not overly burdensome or detrimental to our overall goal of continuing to increase enrolment in our programs.

9. Can the default provisions in the existing CAP Policy Statement at Section 69.265(9) be modified to reduce the chances that otherwise eligible consumers do not lose benefits solely due to the failure to comply with one of the articulated default provisions?

Response: While PWSA does not agree that the existing EDC and NGDC CAP Policy Statement should be applied to water/wastewater utilities to the extent the Commission elects to offer guidance for such programs to be offered by water/wastewater utilities, PWSA supports a collaborative process whereby the affected utilities can provide company specific input.

10. Should utilities be required to develop and use standardized CAP forms and CAP procedures? What are the barriers, if any, of establishing a common application?

Response: PWSA sees benefits to a common application to streamline the enrolment process for vulnerable customers and to assist utilities struggling with increasing enrolment in their programs. In fact, in December 2022, like-minded utilities embarked on the creation of a common application. Such an application must contain the criteria that each utility has deemed necessary for enrolment. Thus far, the largest barrier is being inclusive of customer assistance program criteria for all utility providers.

11. What other additions or changes to the existing CAP Policy Statement should be made to increase eligibility, enrollment and maintenance of CAP benefits?

Response: While PWSA does not agree that the existing EDC and NGDC CAP Policy Statement should be applied to water/wastewater utilities to the extent the Commission elects to offer guidance for such programs to be offered by water/wastewater utilities, PWSA supports a collaborative process whereby the affected utilities can provide company specific input.

12. Should the CAP Policy Statement be amended to include jurisdictional water public utilities, and, if so, what barriers if any exist to doing so and how can those barriers be overcome?

Response: PWSA does not support amendment of the current CAP Policy Statement applicable to EDCs and NGDCs simply for the purpose of making it applicable to water/wastewater utilities. Water/Wastewater utilities do not have a statutory obligation to offer CAPs, nor do they have a statutory right to recover the costs of such programs. In addition, the nature of the utility services offered is different and may support revisions that would only be necessary for the water/wastewater utilities. While PWSA does not agree that the existing EDC and NGDC CAP Policy Statement should be applied to water/wastewater utilities to the extent the Commission elects to offer guidance for such programs to be offered by water/wastewater utilities, PWSA supports a collaborative process whereby the affected utilities can provide company specific input.

13. If a coordinated enrollment process could be achieved with respect to CAP, could that same process be applied to identify eligibility for a utility's Low Income Usage Reduction Program (LIURP) or eligibility for receipt of hardship fund grants?

Response: While PWSA does not agree that the existing EDC and NGDC CAP Policy Statement should be applied to water/wastewater utilities to the extent the Commission elects to offer guidance for such programs to be offered by water/wastewater utilities, PWSA supports a collaborative process whereby the affected utilities can provide company specific input.

14. What changes are required to the Commission's existing policies or regulations to incorporate improvements?

Response: PWSA does not offer an opinion regarding revisions to the current universal service and energy conservation programs applicable to EDCs and NGDCs. To the extent the Commission elects to offer guidance for such programs to be offered by water/wastewater utilities, PWSA supports a collaborative process whereby the

affected utilities can provide company specific input. Any directives that are imposed on water/wastewater utilities must also include the right of the water/wastewater to full cost recovery for implementation of their universal service and energy conservation programs.