

COMMONWEALTH OF PENNSYLVANIA



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November 20, 2023

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Petition of Aqua Pennsylvania, Inc. for Approval
of Third LTIP and LSLR Program 2023-2027
Docket No. P-2023-3043755

Dear Secretary Chiavetta:

Attached for electronic filing please find the Office of Consumer Advocate's Comments in this matter.

Copies have been served as indicated on the enclosed Certificate of Service.

Respectfully submitted,

A handwritten signature in blue ink that reads "Erin L. Gannon".

Erin L. Gannon
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Enclosures:

cc: Office of Administrative Law Judge (email only)
Paul Diskin, Bureau of Technical Utility Services (email only: pdiskin@pa.gov)
Office of Special Assistants (email only: ra-OSA@pa.gov)
Certificate of Service

*4863-2190-3250

CERTIFICATE OF SERVICE

Petition of Aqua Pennsylvania, Inc. for :
Approval of Third LTIP and LSLR Program : Docket No. P-2023-3043755
2023-2027 :

I hereby certify that I have this day served a true copy of the following document, the Office of Consumer Advocate's Comments, upon parties of record in this proceeding in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant), in the manner and upon the persons listed below. This document was filed electronically on the Commission's electronic filing system.

Dated this 20th day of November 2023.

SERVICE BY E-MAIL ONLY

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Dated: November 20, 2023
*4887-6423-3362

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Petition of Aqua Pennsylvania, Inc. for :
Approval of Third LTIP and LSLR Program : Docket No. P-2023-3043755
2023-2027 :

COMMENTS OF THE
OFFICE OF CONSUMER ADVOCATE

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Counsel for:
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Dated: November 20, 2023

I. INTRODUCTION

On October 23, 2023, Aqua Pennsylvania, Inc. (Aqua) filed a proposed Long-Term Infrastructure Improvement Plan for the 5-year period 2023 through 2027, related to its water operations (LTIIIP III). The LTIIIP includes a Lead Service Line Replacement Program. The timing of the LTIIIP is related to a commitment made by Aqua as part of the Commission-approved Settlement at Docket No. A-2022-3034143 to amend its water LTIIIP to include the acquisition of the water system assets of the Borough of Shenandoah and the Municipal Authority of the Borough of Shenandoah. In addition, to comply with 52 Pa. Code § 65.54(b), the proposed LTIIIP includes Aqua's proposed Lead Service Line Replacement (LSLR) program as a separate and distinct component of its LTIIIP. The OCA submits these Comments on LTIIIP III for the Commission's consideration.

II. COMMENTS

Language Access

The printed and broadcast materials attached to the LSLR plan (Exhibits A to Q), including the linked online materials and videos, should be available in Spanish and other commonly used non-English languages in Aqua's service territories. Exhibits C, E and K have a statement in Spanish directing customers to call Aqua's customer service department. The other materials, including the linked online materials and videos, do not. No other languages are referenced.

Aqua should confirm that all of the materials will be translated to and available in Spanish and that the printed and broadcast materials will include a statement in Spanish and other languages spoken in Aqua's service territories informing the customer to contact Aqua for information and translation assistance. This will support Aqua's efforts to complete its service

line inventory and help to ensure that all Aqua customers have access to information that could impact their health and the continuity of their water service.

III. CONCLUSION

The OCA submits that, while it is not requesting a hearing in this proceeding at this time, Aqua should be required to supplement its filing to show that its proposed communications, outreach, and education regarding its LSLR program are reasonably and adequately designed to support customer participation and ensure customer protection.

Respectfully submitted,



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