

November 21, 2024

Via Electronic Filing

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

Re: **Pittsburgh Water Response to August 22, 2024 Order**
2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs
Docket Nos. M-2023-3038944

Pennsylvania Public Utility Commission, et. al. v. The Pittsburgh Water and Sewer
Authority Docket Nos. R-2023-3039919 et. al.

Dear Secretary Chiavetta:

Please accept this letter on behalf of the Pittsburgh Water and Sewer Authority d/b/a Pittsburgh Water ("Pittsburgh Water) in response to the above captioned Order regarding use of the Common Application Form ("CAF") as developed by the Universal Service Working Group ("USWG"). Specifically, Ordering Paragraph 2 directed:

That a water/wastewater fixed public utility choosing to use only the Common Application Form data elements, consistent with the recommendation in this Order, shall file and serve a notice of its intention and a timeline for implementation.¹

¹ 2023 Review of All Jurisdictional Fixed Utilities' Universal Service Programs, Docket No. M-2023-3038944, Order entered August 22, 2024 at 14-15. As a water/wastewater/stormwater utility, Pittsburgh Water does not file universal service plans similar to electric distribution or natural gas distribution companies. Pittsburgh Water's voluntary customer assistance programs were most recently reviewed and approved by the Commission in its base rate filing. *Pennsylvania Public Utility Commission, et. al. v. The Pittsburgh Water and Sewer Authority* Docket Nos. R-2023-3039919 et. al., Order entered January 18, 2024. Therefore, a copy of this letter is also being filed at that docket and served on the parties in that proceeding.

Pittsburgh Water chooses to use the Common Application Form (“Form”) data elements, consistent with the Commission's recommendation in its Order and has taken the following steps to implement this Form:

- The webform available on Pittsburgh Water’s website, [pgh2o.com](https://www.pgh2o.com), to apply for bill assistance programs was redesigned in accordance with the Form data elements. This redesigned form is currently available both online at <https://www.pgh2o.com/residential-commercial-customers/customer-assistance-programs/apply-bill-discount-program-winter> and in a printable form that can either be submitted as an email attachment or mailed to a customer upon request.
- The form available to Pittsburgh Water personnel to enroll a customer, currently a service order within the SpryMobile application, will be updated with all elements of the Form by December 20, 2024. Due to the sunset of SpryMobile in March 2025, when Customer Service-related service orders are to be instead offered within the CityWorks application, the form available to Pittsburgh Water personnel to enroll a customer will proceed to be developed in advance of this transition by either of Pittsburgh Water’s third party vendors for the Customer Information System (CIS) or CityWorks. The timeline for completion of this development work is contingent upon which solution is determined to be the least costly path forward, ensuring the best use of ratepayer dollars. The end result will be a seamless transition between intake forms that contain all elements of the Form. As such, the timeline for this transition is in the process of being determined. Pittsburgh Water personnel expect to identify a path forward, following a return on investment analysis, by December 31, 2024.

Pittsburgh Water appreciated the opportunity to participate in the Commission’s Universal Service Working Group and commends the Commission on conducting a fully collaborative process. For the past six years, Pittsburgh Water has been committed to providing and enhancing a comprehensive suite of customer assistance program offerings for income-eligible residential customers.

Please do not hesitate to contact me with any questions.

Sincerely



Deanne M. O'Dell

DMO/lww

cc: Certificate of Service
Jennifer Johnson, BCS (via email only jennifjohn@pa.gov)
Louise Fink Smith, Esq. Law Bureau (via email only finksmith@pa.gov)
Joseph Magee, BCS (via email only jmagee@pa.gov)
Stephanie Wilson, Law Bureau (via email only stepwilson@pa.gov)

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of Pittsburgh Water's Responsive Filing upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

Lindsay A. Berkstresser, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101
lberkstresser@postschell.com

Kimberly A. Klock, Esquire
Michael J. Shafer, Esquire
PPL Services Corporation
645 Hamilton St., Suite 700
Allentown, PA 18101
kklock@pplweb.com
mjshafer@pplweb.com

Christy Appleby, Esquire
Office of Consumer Advocate
555 Walnut Street
Forum Place, 5th Floor
Harrisburg, PA 17101-1923
cappleby@paoca.org

Allison Kaster
Bureau of Investigation & Enforcement
Commonwealth Keystone Building
400 North Street, 2nd Floor West
Harrisburg, PA 17105-3265
akaster@pa.gov

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

Lori Mohr, Esquire
Bureau of Consumer Services
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17101
laumohr@pa.gov

Paul Diskin
Bureau of Technical Utility Services
PA Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17101
pdiskin@pa.gov

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

John F. Povilaitis, Esquire
Alan M. Seltzer, Esquire
Buchanan Ingersoll & Rooney, PC
409 North Second Street
Suite 500
Harrisburg, PA 17101-1357
john.povilaitis@bipc.com
alan.seltzer@bipc.com

Caroline Choi, Esquire
PECO Energy Company
2301 Market Street, S23-1
Philadelphia, PA 19103-2921
Caroline.Choi@exeloncorp.com

Pamela C. Polacek, Esquire
C&T Enterprises, Inc.
1775 Industrial Blvd.
Lewisburg, PA 17837
ppolacek@ctenterprises.org

Thomas J. Sniscak, Esq.
Kevin J. McKeon, Esq.
Whitney E. Snyder, Esq.
Hawke McKeon & Sniscak, LLP
100 North Tenth Street
Harrisburg, PA 17101
tjsniscak@hmslegal.com
kjmckeon@hmslegal.com
wesnyder@hmslegal.com

John F. Doherty, Esq.
Krycia Kubiak, City Solicitor, The City of
Pittsburgh Department of Law
City-County Building, Suite 313
414 Grant Street
Pittsburgh, PA 15219
John.doherty@pittsburghpa.gov
krycia.kubiak@pittsburghpa.gov

Cheryl R. McAbee, Esq.
2005 Garrick Drive
Pittsburgh, PA 15235
crm121@pitt.edu

Dated: November 21, 2024



Deanne M. O'Dell, Esq.