

January 21, 2025

Via Electronic Filing

Rosemary Chiavetta, Secretary
PA Public Utility Commission
400 North Street
Harrisburg, PA 17120

RE: The Pittsburgh Water and Sewer Authority – Water – R-2023-3039920;
The Pittsburgh Water and Sewer Authority – Wastewater – R-2023-3039921;
The Pittsburgh Water and Sewer Authority – Stormwater – R-2023-3039919

Dear Secretary Chiavetta:

Pursuant to Paragraph 9.D.3. of the Terms and Conditions of Settlement approved by the Commission regarding the above captioned base rate case, Pittsburgh Water and Sewer Authority d/b/a “Pittsburgh Water” agreed to update its March 22, 2022 Customer Complaint Assessment to include an evaluation of informal customer complaints submitted to the Commission’s Bureau of Consumer Services. The March 22, 2022 Assessment analyzed customer Disputes and Complaints from 2019 to 2021. Enclosed please find Pittsburgh Water’s updated assessment pursuant to the terms of the settlement.

Copies to be served in accordance with the attached Certificate of Service.

Sincerely,



Deanne M. O'Dell

DMO/lww

Enclosure

cc: Hon. Gail M. Chiodo w/enc.
Cert. of Service w/enc.

CERTIFICATE OF SERVICE

I hereby certify that this day I served a copy of PWSA's **Updated Customer Complaint Assessment** upon the persons listed below in the manner indicated in accordance with the requirements of 52 Pa. Code Section 1.54.

Via Email Only

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Dated: January 21, 2025

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ROOT CAUSE ANALYSIS

Updated January 2025

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In November 2021, Raftelis conducted a root cause analysis to identify the sources and causes of Pittsburgh Water customer complaints. Pittsburgh Water provided dispute and complaint data from 2019 to 2021. After a comprehensive analysis, Raftelis proposed several recommendations aimed at reducing the number of complaints filed with the Pennsylvania Public Utility Commission (PA PUC). As part of this analysis, Raftelis made seven recommendations aimed at reducing the initial filing of disputes with Pittsburgh Water, which would ultimately decrease the number of informal complaints submitted to the PA PUC's Bureau of Consumer Services (BCS). Upon receiving this report, Pittsburgh Water took immediate action to implement these recommendations.

Five recommendations were specifically focused on customer communications. These included providing comprehensive training to effectively resolve conflicts and address meter testing requests, dispatching Pittsburgh Water plumbers to properties prior to the official initiation of disputes, and enhancing direct communication with customers regarding meter testing and departmental cross-training. As of April 2023, Pittsburgh Water has completed de-escalation training and implemented a call scripting, flowchart, and checklist model to assist Customer Service Representatives in addressing the most common customer concerns.

Since concerns related to consumption and meter testing results were the primary causes of customer disputes, Pittsburgh Water dedicated substantial time to improving training and procedural approaches for this specific type of communication. This enhancement included on-site tours and training on the meter testing bench process. Additionally, Pittsburgh Water updated its website [Understanding Your Water Meter | Pittsburgh Water \(pgh2o.com\)](https://www.pgh2o.com/understanding-your-water-meter), and is committed to continuing water meter upgrades in accordance with the PA PUC Compliance Plan Stage One.

In the event that the customer still requests the testing of the water meter, Pittsburgh Water has initiated a leak detection procedure. A plumber will visit the property to conduct a basic leak detection inspection while educating the customer about potential causes of increased water consumption. This process may alleviate the customer's desire to have the water meter removed for testing. If the customer chooses to proceed with their request, a Pittsburgh Water Compliance Analyst will contact them directly to review the results of the meter testing and potentially resolve the customer's complaint.

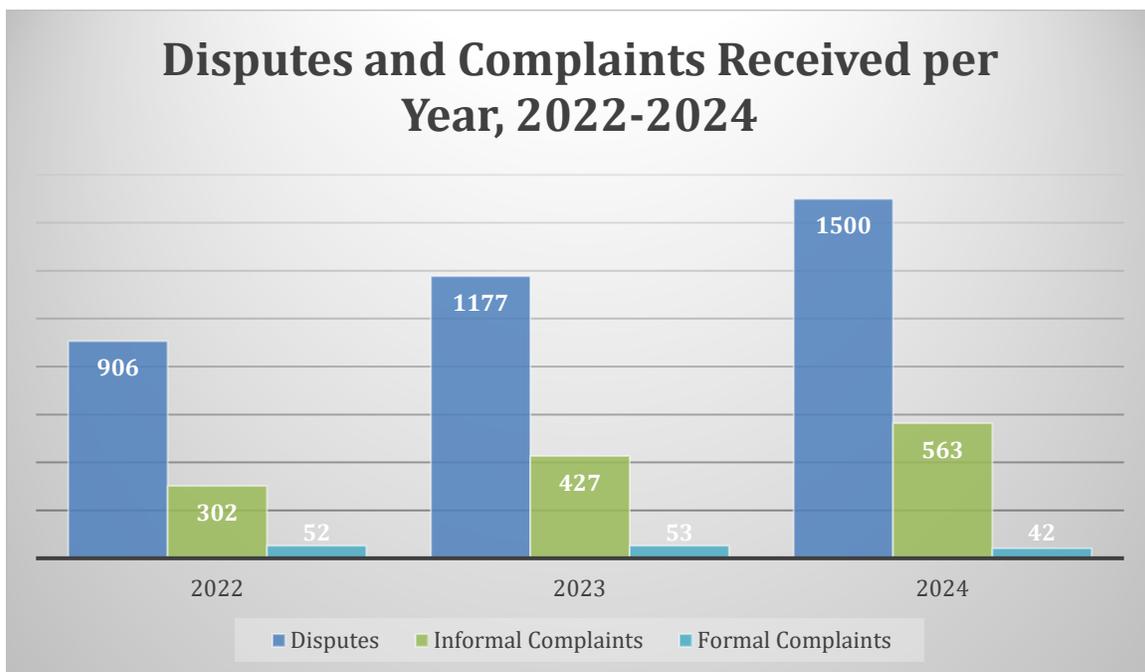
The remaining recommendations made by Raftelis included enhancing billing efforts to identify high consumption more promptly, improving the efficiency of Pittsburgh Water's curb boxes, and expanding data tracking to better identify trends. To address these recommendations, Pittsburgh Water introduced an internal Sensus Analytics report to alert staff of high consumption before the monthly pre-bill editing process. Additionally, Pittsburgh Water

launched the online Customer Advantage portal that enables customers to monitor their usage and set alert thresholds. Pittsburgh Water has also continued to collaborate with contractors to enhance the overall efficiency of curb stop locations, repairs, and replacements.

To enhance overall data collection and tracking, Pittsburgh Water has refined its tracking categories to more effectively identify the primary concerns related to disputes and complaints. The transition to Pittsburgh Water’s new billing system has implemented a systematic tracking approach, assigning unique case numbers to all disputes and complaints filed. This improved tracking system enables Pittsburgh Water to identify trends more rapidly.

As part of the Joint Petition for Settlement, A.D.3.a, Pittsburgh Water was required to update the March 2022 root cause analysis to include an evaluation of informal customer complaints submitted to BCS as well as formal customer complaints filed with the PA PUC.

Pittsburgh Water records indicate a decline in the number of disputes and complaints due to the protections implemented during the COVID-19 pandemic. However, as restrictions were lifted and Pittsburgh Water resumed collection efforts, the levels of disputes and complaints began to rise. From 2022 to 2023, there was a 30% increase, followed by an additional 27% increase from 2023 to 2024 as illustrated below.



Pittsburgh Water's dispute and complaint categorizations have expanded from 13 to 23 categories to enhance analytical monitoring and facilitate trend identification. Despite this enhanced categorization, the most common type of dispute remains related to water consumption, as illustrated below. More than half of the filed disputes pertain to water consumption, with billing-related issues being the second most common type of dispute. All other dispute categories combined account for the remaining 20% of disputes.

Dispute Type	2022 Percentage	2023 Percentage	2024 Percentage	Average Percentage, 2022-2024
Backflow	0%	0%	0%	0%
Balance Validation	0%	1%	4%	2%
Bankruptcy	0%	0%	0%	0%
Billing	7%	17%	22%	15%
Catch Up/Estimates	4%	6%	2%	4%
Consumption	68%	61%	62%	63%
Damages	0%	0%	0%	0%
Fees	0%	2%	1%	1%
Field	1%	0%	0%	0%
Interest	0%	0%	0%	0%
JTS/Lien	1%	1%	2%	2%
Landlord/Tenant	1%	0%	0%	0%
Locked Customer #	5%	0%	0%	2%
Minimum Charges	0%	0%	0%	0%
No Water	0%	0%	0%	0%
Non-registering	4%	3%	1%	3%
Other	1%	2%	2%	2%
Payment	1%	2%	0%	1%
Personnel	0%	0%	0%	0%
Rates	0%	0%	0%	0%
Stormwater Fee	7%	5%	1%	4%
Term/PAR	0%	0%	0%	0%
Water Pressure	0%	0%	0%	0%
Water Quality	0%	0%	0%	0%

The number of informal complaints remained lower than disputes but exhibited a similar upward trend from 2022 to 2024. As collection activities resumed following the COVID-19

pandemic, the number of informal complaints related to terminations and/or payment arrangements significantly increased, with over 50% of complaints filed in 2024 falling into this category. The second most common type of complaint was related to billing, accounting for 24% of the total complaints filed. Overall, the three-year analysis has shown that informal complaint filings continue to be most prevalent in the categories of terminations and payment arrangement requests, billing, and water consumption.

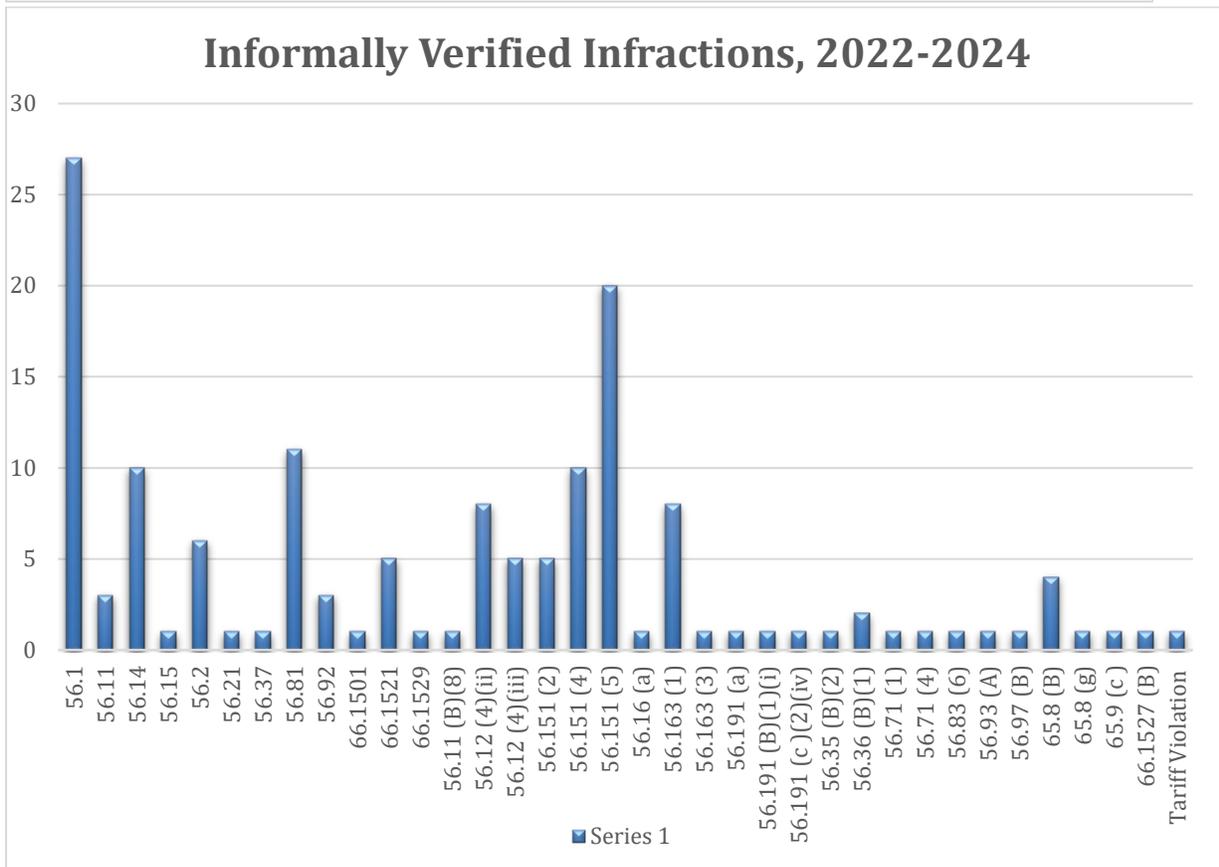
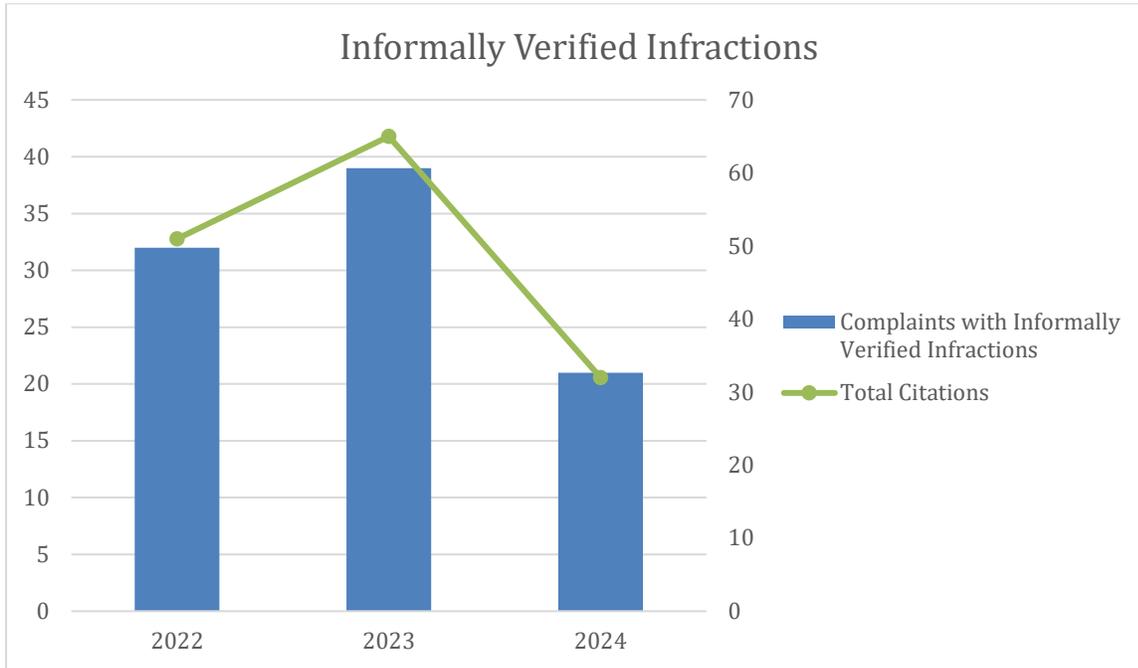
Informal Complaint Type	2022 Percentage	2023 Percentage	2024 Percentage	Average Percentage, 2022-2024
Backflow	2%	0%	0%	1%
Balance Validation	0%	0%	0%	0%
Bankruptcy	0%	0%	0%	0%
Billing	15%	14%	24%	17%
Catch Up/Estimates	2%	4%	1%	3%
Consumption	17%	18%	6%	13%
Damages	3%	1%	3%	3%
Fees	0%	1%	0%	0%
Field	6%	6%	2%	4%
Interest	2%	0%	0%	1%
JTS/Lien	3%	1%	0%	1%
Landlord/Tenant	3%	3%	1%	2%
Locked Customer #	2%	0%	0%	1%
Minimum Charges	0%	0%	0%	0%
Nonaccess	0%	5%	1%	2%
No Water	1%	3%	1%	1%
Nonregistering	8%	5%	1%	4%
Other	8%	5%	7%	7%
Payment	3%	2%	0%	2%
Personnel	0%	0%	0%	0%
Rates	1%	0%	0%	0%
Stormwater Fee	7%	3%	0%	3%
Term/PAR	18%	28%	53%	33%
Water Pressure	0%	0%	0%	0%
Water Quality	0%	0%	0%	0%

Pittsburgh Water customers have submitted significantly fewer formal complaints compared to both informal complaints and disputes. While formal complaints were trending upward from 2019 to 2023, there was a 26% decrease in formal complaints filed from 2023 to

2024. According to the standardized formal complaint form, complainants can select a filing reason from five categories, with the option to choose more than one. Based on this tracked data, the most common type of formal complaint pertains to charges on the customer’s bill, with the second most frequently selected category being related issues. Complaints filed under the "Other" category predominantly concerned previously unbilled charges, requests for reimbursement for damages, landlord and tenant balance responsibilities, and stormwater charges.

Formal Complaint Type	2022 Percentage	2023 Percentage	2024 Percentage	Average Percentage, 2022-2024
The utility is threatening to shut off my service or has already shut off my service.	12%	9%	7%	9%
I would like a payment agreement.	12%	2%	7%	7%
Incorrect charges are on my bill.	46%	43%	48%	46%
I am having a reliability, safety or quality property with my utility service.	4%	17%	14%	12%
Other.	44%	57%	38%	46%

Between 2022 and 2024, Pittsburgh Water received a total of 148 informally verified infractions. This equates to informally verified infractions being issued for 11% of informal complaints received during the same period. These citations were distributed across 92 complaints, resulting in an average infraction rate of 8% per informal complaint filed during this three-year period. The most common infraction, accounting for 24% of the total, was cited under § 56.151 and pertained to Dispute Procedures. Specifically, 14% of infractions were cited as § 56.151 (5), which mandates that a report be issued to a complainant within 30 days of a dispute being filed. Additionally, 7% of citations were cited as § 56.151 (4), which requires that the complainant receive all necessary information to make an informed decision regarding their dispute, and 3% of citations were cited as § 56.151 (2), which mandates that Pittsburgh Water investigate a dispute using methods that are reasonable under the circumstances. The second most common infraction, representing 18% of the total, was cited as § 56.1, which defines the statement of purpose and policy that establishes and enforces uniform, fair, and equitable standards for residential public utility services. The third most common infraction, accounting for 13% of the total, was cited under multiple different sections but was related to estimated or non-registering water meters and previously unbilled consumption charges.



Recommendations

Number	Recommendation
Disputes	
1	Retrain Customer Service Representatives on high consumption and meter testing, and establish an annual training schedule.
2	Add meter testing bench tours and training to all new hire schedules.
Informal Complaints	
3	Enhance data tracking for dispute to complaint conversion rates.
4	Update payment arrangement training SOPs for Customer Service Representatives.
5	Develop training specific to identifying and properly handling disputes and complaints.
Formal Complaints	
6	Enhance data tracking for complaint types.
Informally Verified Infractions	
7	Update non-registering water meter account listing.
8	Initiate Utility Report quality assurance reviews.

The completed analysis identified several trends within each stage of the dispute, informal complaint, and formal complaint processes. Historically, Pittsburgh Water has successfully utilized training programs to educate both Customer Service Representatives and the customers they serve. Most recommendations focus on enhancing the training tools available to Customer Service Representatives, empowering them to address customer concerns in accordance with the First Call Resolution model.

At the dispute level, it is essential to address concerns related to high consumption and customer requests for water meter accuracy testing. Most issues regarding consumption are not due to inaccurate measurements reported by the water meter. Customer Service Representatives must provide callers with all relevant information to enable them to make informed judgments, with a meter test being offered only after all other possibilities have been thoroughly explored. Enhancing the training program specific to consumption will equip representatives with the necessary tools to address these concerns more efficiently and effectively. Ultimately, this will result in a decrease in the number of consumption-related disputes.

At the informal complaint level, a significant volume of complaints is related to requests for payment arrangements, most of which could have been resolved before the customer contacted the PA PUC. This indicates an opportunity to provide additional training and support to Customer Service Representatives, enabling them to determine when a customer's request for a payment arrangement should ultimately be denied. Currently, there is no tracking mechanism in place to assess the conversion rate from disputes to informal complaints. Implementing additional tracking would allow Pittsburgh Water to easily identify the percentage of disputes resolved internally, without the need for PA PUC intervention.

At present, there is limited tracking data available at the formal complaint level, apart from the categories listed on the formal complaint submission form. By implementing additional tracking measures, Pittsburgh Water would gain access to a comprehensive data set that could

help identify trends more promptly and develop more effective strategies for addressing similar formal complaints that may arise in the future.

Since most informally verified infractions are associated with Pittsburgh Water's initiative regarding non-registering water meters, it would be advantageous to update all reporting related to water meters that are providing estimated readings and reporting zero consumption. This update will enable Pittsburgh Water to identify accounts that require attention and ensure these accounts are included in the Non-Access process. Additionally, based on the various informally verified infractions related to responses to customer disputes, it is recommended that Pittsburgh Water's Compliance Department establish a quality assurance review process to ensure that the information provided to customers is comprehensive and accurate.

By implementing the recommendations outlined above, Pittsburgh Water will be able to address trends at each stage of the dispute and complaint process. This will enable staff to concentrate on delivering the highest level of service to customers while effectively complying with the regulatory requirements established by the PA PUC.