

EXHIBIT CC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

AQUA PENNSYLVANIA, INC.

DOCKET NO. A-2024-3049015

AQUA STATEMENT NO. 5

**DIRECT TESTIMONY OF
RITA BLACK**

**With Regard To
Customer Assistance Programs**

April 2025

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1 **I. INTRODUCTION**

2 **Q. Please state your name and business address.**

3 A. My name is Rita F. Black and my business address is located at 375 North Shore Drive,
4 Pittsburgh, Pennsylvania 15212.

5

6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by Essential Utilities, Inc. (“Essential”) as the Director of Community
8 Assistance Programs. In this role, I lead assistance programs for Aqua Pennsylvania, Inc.
9 (“Aqua” or the “Company”) and Aqua Pennsylvania Wastewater, Inc. (“APW”); and
10 Peoples Natural Gas Company LLC (“Peoples Natural Gas”) (including the Peoples Gas
11 Company LLC which was merged into Peoples Natural Gas in January 2023) (collectively
12 “the Peoples Companies”); and Essential’s regulated utilities operating in other states.

13

14 **Q. Please describe your educational and professional background.**

15 A. Following receipt of a Bachelor of Science Degree in Accounting from Robert Morris
16 University, I joined Peoples Natural Gas and began a career spanning more than 30 years
17 across the areas of customer service, rates and regulatory affairs, and income-based
18 programming. From 2001 through 2014, I worked in the Rates and Regulatory Affairs
19 department of Peoples Natural Gas as an analyst. My responsibilities as an analyst in the
20 Rates and Regulatory Affairs department included the development and administration of
21 the Universal Service Rider and preparation of the Universal Service Energy and
22 Conservation Plan (“USECP”), as well as preparation of tariff filings testimony, along with
23 other analytical projects. In 2014, I was promoted to Manager, Customer Relations for

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1 Peoples Natural Gas and was responsible for oversight of all income-based programming,
2 including its Customer Assistance Program (“CAP”), Low Income Usage Reduction
3 Program (“LIURP”), Emergency Repair Program, Hardship Fund, and Customer
4 Assistance, Referral and Evaluation Services (“CARES”). In addition to oversight of
5 income-based programming, I was also responsible for compliance on customer-related
6 issues for Pennsylvania and Kentucky. I was promoted to Director, Customer Relations in
7 2016 and was subsequently promoted to Director, Community Assistance Programs in
8 2021 with responsibility for all regulated states under the Essential footprint, including
9 Aqua and Aqua PA. In this role, my oversight of income-based programming has
10 expanded to include Essential’s water and wastewater entities. I retain responsibility for
11 natural gas income-based programming and customer service compliance across
12 Essential’s natural gas footprint.

13
14 **Q. Have you testified previously in any regulatory proceeding?**

15 A. Yes. I have testified in hearings conducted by the Pennsylvania Public Utility Commission
16 (“PUC” or the “Commission”) related to formal customer complaints. I have also
17 submitted direct and rebuttal testimony in base rate proceedings for Aqua, APW, and
18 Peoples Natural Gas.¹ I have also submitted testimony in APW’s acquisitions of the
19 Greenville Sanitary Authority² and the City of Beaver Falls³ sewer systems.

¹ See Docket Nos. R-2024-3047822 and R-2024-3047824; R-2021-3027385 and R-2021-3027386; R-2010-2201702; and R-2012-2285985.

² See Docket No. A-2023-3041695.

³ See Docket No. A-2022-3033138.

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1 **Q. What is the purpose of your Direct Testimony in this case?**

2 A. In my current role, I provide leadership and guidance on low and limited income issues,
3 including development and design of income-based programming for Essential’s water and
4 wastewater subsidiaries, including for Aqua and APW. In my Direct Testimony, I will
5 describe Aqua’s current programming, the methodology used to develop enhanced
6 programs and support for low and limited income households, and lessons learned from
7 the Peoples Companies’ experience in low and limited income programming that will be
8 utilized to assist water and wastewater customers, and which will become available to the
9 Greenville Water Authority (“GWA”) customers as a result of the Proposed Acquisition.

10

11 **Q. Are you sponsoring any Exhibits with your Direct Testimony?**

12 A. No, I am not.

13

14 **II. AQUA’S CUSTOMER ASSISTANCE PROGRAMS**

15 **Q. Does Aqua offer programs to assist limited income customers?**

16 A. Yes. Aqua offers a suite of programs designed to support limited income families and
17 seniors in the Company’s service territory.⁴ These programs are designed to address
18 affordability in a number of ways, including discounted water services; a leak repair
19 program for minor household leaks that lead to high water bills; conservation kits to reduce

⁴ On January 24, 2020, the Commission approved the acquisition of the Peoples Companies by Essential. Docket Nos. A-2018-3006061, A-2018-3006062 and A-2018-3006063 (Order entered Jan. 24, 2020) (“*Aqua-Peoples Acquisition Order*”). As part of the settlement agreement approved by the Commission in that case, a provision was included regarding Aqua PA’s low-income customer assistance programming. *See Aqua-Peoples Acquisition Order, Settlement Agreement*, at ¶ 108. Aqua PA submitted a universal service proposal in its 2021 base rate case proceeding and received approval in that proceeding for a suite of programs as described in the settlement agreement approved in the Aqua-Peoples Acquisition Order.

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1 water usage charges; and a hardship fund for customers who need assistance with arrears.
2 The most comprehensive of these programs is Aqua's CAP, which provides monthly
3 discounts based on income eligibility, along with credits towards pre-program arrearages
4 to reduce those balances over time.

5
6 **Q. Please describe the CAP in more detail.**

7 A. Aqua's CAP provides three benefits to participants: 1) discounted monthly bills; 2) \$40
8 credits towards pre-program arrearages for each monthly payment; and 3) protection from
9 late payment charges. Discounts are offered on a tiered basis, providing the deepest
10 discounts to those with the lowest incomes. Any balance a customer may owe when joining
11 the program is frozen and eligible for elimination through \$40 credits that are posted to the
12 account each month when the reduced monthly bill is paid. And, while participating in
13 CAP, if the customer misses the due date of their bill, no late payment fees are applied.

14
15 **Q. Who is eligible to participate?**

16 A. Customers with incomes at or below 200% of the Federal Poverty Level ("FPL") are
17 eligible to participate in the CAP. For context, a family of four with an annual income at
18 or below \$62,400 would qualify for enrollment in the CAP.

19
20 **Q. Please describe the discounts available through the CAP.**

21 A. Discounts are provided at four benefit levels: 1) incomes at or below 50% FPL; 2) incomes
22 between 51 and 100% FPL; 3) incomes between 101 and 150% of the FPL; and 4) incomes
23 between 151 and 200% FPL. Aqua's bills include a Fixed Base Facility Customer Charge

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1 and a Consumption Charge. Using the tiers I have described, discounts are applied to each
2 component of the bill as follows:

3

	Residential Water Customers			
	At or Below 50% FPL	51%-100% FPL	101%-150% FPL	151%-200% FPL
Fixed Base Facility Customer Charge	100% discount	100% discount	100% discount	100% discount
Consumption Charges	85% discount	75% discount	50% discount	25% discount

4

5 **Q. How do customers enroll in the CAP?**

6 A. Aqua has partnered with Dollar Energy Fund, a western Pennsylvania, non-profit, to
7 administer the CAP, which includes handling enrollment of customers. This ensures
8 Aqua's customers have easy access to participate in the CAP, for which they can complete
9 an online application through Dollar Energy Fund's website, provide verbal information to
10 begin their application via phone, or apply at a local participating agency. Customers must
11 provide income documentation to establish their eligibility to participate, which can
12 include pay stubs, benefit statements, or proof of participation in an electric or natural gas
13 CAP. Once enrolled, customers can participate for up to three years, before recertifying
14 their income status, depending on the type of income the household maintains.

15

16

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1 **Q. How do customers access the leak repair and conservation kit programs you**
2 **described?**

3 A. High water users may be identified by Aqua or customers may self-refer for assistance.
4 Customers can obtain information on these programs through various channels, including
5 via Aqua’s website, by contacting the customer service call center, or from interaction with
6 field employees who provide cards about the leak repair programs to customers when
7 appropriate. The Community Assistance team also has a dedicated phone line and email
8 address for customer use.

9
10 **Q. Please describe the hardship fund.**

11 A. The hardship fund is available to customers with a high bill or arrearages in need of
12 assistance. For example, a leaking toilet may have caused a high water bill for a limited
13 income senior. The hardship fund is an option that can be used to relieve the high bill
14 burden for that customer. It can also be used for customers who have fallen behind on
15 payments and need assistance to get current on their bills.

16
17 **Q. Is the hardship fund sufficient to support the potential needs of GWA customers?**

18 A. Yes. In fact, Aqua’s shareholders have agreed to contribute \$200,000 annually to the fund
19 until the next base rate proceeding.

20
21 **III. BENEFITS TO THE GWA CUSTOMERS**

22 **Q. Does the GWA currently have any income-based assistance programs?**

23 A. No.

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1 **Q. How will the customers of the GWA benefit from Aqua’s ownership and the**
2 **assistance they can receive through Aqua’s income-based programs?**

3 A. Families and seniors with limited incomes reside throughout Pennsylvania. In Greenville,
4 the need for programs such as these is even more pronounced. Census data shows that
5 roughly 16% of students in Greenville School District, aged 5 to 17, are living in poverty.⁵
6 This demonstrates a need in the area that can be assisted through Aqua’s programs, which
7 provide benefits to customers with incomes up to twice the FPL. Aqua’s programs will
8 provide clear and specific public benefits to the GWA customers that would not be present
9 absent this transaction. The customers of the GWA do not currently have access to an
10 income-based discount program, and the GWA has not taken steps to implement such
11 programs.

12 Not only has Aqua developed and implemented comprehensive programs that
13 increase affordability for low and limited income households, but its programs also provide
14 important safety nets for customers. These safety nets, such as leak repair program and
15 hardship fund, are critical for limited income households that are often not financially
16 prepared to handle the negative impacts of life stressors, such as a plumbing leak or the
17 loss of a job that leads to arrears on utility bills. Aqua has provided education to its
18 customer service representatives and field personnel regarding these programs, which is
19 important to ensure customers in need are informed of the existence of these resources and
20 connected with the individuals who can help them. The Essential Community Assistance
21 Team has years of experience with limited income programming across the Essential

⁵ https://www.census.gov/data-tools/demo/saipe/#/?s_state=42&s_county=42085&s_district=4211160&s_geography=district&s_measures=5_17_fam&%3D=-

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1 footprint and works with vulnerable customers on a daily basis to help them enroll in
2 programs that would benefit them. All of these resources will be brought to bear to the
3 benefit of the GWA customers as part of the Essential family as a result of Aqua's
4 acquisition and ownership of the GWA System.

5
6 **Q. Will the GWA customers be eligible to receive the CAP discounts and other benefits?**

7 A. Yes, they will, provided that they meet the income eligibility requirements and apply to
8 participate.

9
10 **Q. Will there be a significant cost impact to the CAP costs by the addition of eligible
11 GWA customers?**

12 A. It is not anticipated that the costs related to administration of the CAP will increase as a
13 result of enrollment by eligible GWA customers post-acquisition. While it is not known
14 today how many of the GWA customers will enroll in the CAP, it is anticipated that any
15 cost impact to Aqua's non-CAP residential customer base will be minimal and, in any
16 event, would be more than offset by the benefits afforded to those low-income customers
17 receiving needed assistance.

18
19 **IV. CONCLUSION**

20 **Q. Does this conclude your Direct Testimony?**

21 A. I reserve the right to submit supplemental testimony if additional issues arise during the
22 course of this proceeding.