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VIA eFiling

September 19, 2025

Matthew L. Homsher, Secretary
Commonwealth of Pennsylvania
Pennsylvania Public Utility Commission
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120

**Re: *Nunc Pro Tunc* Petition of Pennsylvania-American Water Company for
Limited Waiver of 52 Pa. Code § 56.11(a) and Related Tariff Provisions**

Docket No. P-2024-3051518

Dear Secretary Homsher:

Enclosed for filing with the Pennsylvania Public Utility Commission is the Joint Petition for Approval of Settlement of All Issues.

Copies are being served in accordance with the enclosed Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Teresa K. Harrold", is written over a horizontal line.

Teresa K. Harrold

Enclosures

cc: Honorable Deputy Chief Administrative Law Judge Mark A. Hoyer
Certificate of Service

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

ADMINISTRATIVE LAW JUDGE MARK A. HOYER

Nunc Pro Tunc Petition of Pennsylvania-American Water Company for Limited Waiver of 52 Pa. Code § 56.11(a) and Related Tariff Provisions : : Docket No. P-2024-3051518

JOINT PETITION FOR APPROVAL OF SETTLEMENT OF ALL ISSUES

I. INTRODUCTION

Pennsylvania-American Water Company (“PAWC” or the “Company”), the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), the Office of Consumer Advocate (“OCA”), and the Office of Small Business Advocate (“OSBA”) (singularly, a “Petitioner” and collectively, the “Joint Petitioners”) agree to settle the above-captioned proceeding in full, subject to the terms and conditions herein.¹

II. BACKGROUND

1. On October 3, 2024, PAWC filed the Petition for Limited Waiver of 52 Pa. Code § 56.11(a) and Rules 10.1 and 8 of PAWC’s water and wastewater tariffs in the above-referenced proceeding.
2. On October 23, 2024, the Office of Small Business Advocate (“OSBA”) filed a Notice of Intervention. Also on October 23, 2024, OSBA’s counsel, Steven C. Gray, Esq., filed a Notice of Appearance.
3. On October 23, 2024, CAUSE-PA filed a Petition to Intervene and Answer.

¹ In addition, the Bureau of Investigation and Enforcement (“I&E”) does not oppose these settlement terms.

4. On November 12, 2024, PAWC filed Preliminary Objections.
5. On November 21, 2024, OCA filed a Notice of Intervention.
6. On November 22, 2024, CAUSE-PA filed an Answer to PAWC's Preliminary Objections.
7. On December 20, 2024, the Commission scheduled a prehearing conference for January 15, 2025 before Administrative Law Judge ("ALJ") Mark A. Hoyer.
8. On January 14, 2025, CAUSE-PA and PAWC filed a Joint Motion requesting (a) to cancel the prehearing conference; (b) to engage in settlement discussions among the parties and provide monthly status reports to the ALJ; and (c) to postpone any ruling on PAWC's Preliminary Objections until settlement discussions conclude.
9. On January 21, 2025, I&E filed a Notice of Appearance.
10. PAWC has continued to provide monthly status reports to ALJ Hoyer. On August 21, 2025, PAWC notified ALJ Hoyer that the parties agreed to a settlement in principle.

III. SETTLEMENT TERMS

The Joint Petitioners agree as follows:

Approval of Petition

11. The Joint Petitioners agree that the Commission should approve PAWC's Petition for Limited Waiver of 52 Pa. Code § 56.11(a) and Rules 10.1 and 8 of PAWC's water and wastewater tariffs, subject to approval of the following conditions.

Withdrawal of Preliminary Objections

12. PAWC withdraws its Preliminary Objections, filed November 12, 2024.

H2O Help to Others Hardship Fund ("Hardship Fund")

13. Between August 26, 2024 and September 12, 2024, upgrades to two systems used for billing caused a technical issue that resulted in a subset of customers not receiving a paper

bill or notification of their electronic bill (“Billing Delay”), which is the subject of the above-referenced Petition. In recognition of the fact that a larger balance due may present a challenge for lower income households, PAWC contributed an additional \$100,000 to its Hardship Fund.

14. PAWC determined that approximately 4,966 self-identified low-income customers were impacted by the Billing Delay. Since the Billing Delay, 26 of these customers applied for Hardship Fund grants, but were deemed ineligible. PAWC will conduct outreach to all of these customers and approve Hardship Fund grants for these customers as long as they are income-eligible (i.e., 250% of federal poverty income guidelines or below).

Customer Assistance Program Outreach

15. Since the Billing Delay, 77 of the 4,966 self-identified low-income customers enrolled in PAWC’s Arrearage Management Program (“AMP”). PAWC will conduct targeted outreach, including at least one letter and one email (if email address is available) to all 4,966 customers providing program details and instructions on how to apply for PAWC’s customer assistance programs, including the Bill Discount Program, the Hardship Fund, and AMP.
16. PAWC will update its Customer Assistance Advisory Group about the results of the outreach, including the number of affected customers who were enrolled in each low income program and the number of affected customers with outstanding balances dating back to the pancake bill incident. Based on these numbers, PAWC will facilitate a discussion about whether additional outreach is needed.

Payment Arrangements

17. All customers impacted by the Billing Delay were sent a letter on October 4, 2024 notifying them that they are eligible for a 12-month payment arrangement as a result of the Billing Delay. If such customers previously defaulted on a Company or Commission payment arrangement, PAWC will authorize a new payment arrangement for these customers.
18. When impacted customers contact the Company seeking a payment arrangement, PAWC's customer service representatives will ask about the customers' household size and income level to screen for potential eligibility for PAWC's low-income programs. If the customer responds affirmatively, they will be directed to contact PAWC's assistance program administrator, Dollar Energy Fund, to begin the application process for PAWC's Bill Discount and Arrearage Management Programs and/or to apply for a Hardship Fund grant.

Standard Settlement Conditions

19. The Settlement is conditioned upon the Commission's approval of the terms and conditions contained in the Settlement without modification. If the Commission modifies the Settlement, the Joint Petitioners may elect to withdraw from the Settlement and may proceed with litigation and, in such event, the Settlement shall be void and of no effect. Such election to withdraw must be made in writing, filed with the Secretary of the Commission and served upon the Joint Petitioners within five (5) business days after the entry of an Order modifying the Settlement. The Joint Petitioners acknowledge and agree that the Settlement, if approved, shall have the same force and effect as if the Joint Petitioners had fully litigated this proceeding.
20. This Settlement is proposed by the Joint Petitioners to settle all issues in the instant proceeding. If the Commission does not approve the Settlement and the proceeding continues, the Joint Petitioners reserve their respective procedural rights, including the

right to present additional testimony and to conduct full cross-examination, briefing and argument. The Settlement is made without any admission against, or prejudice to, any position which any Petitioner may adopt in the event of any subsequent litigation of this proceeding, or in any other proceeding.

21. The Joint Petitioners acknowledge that the Settlement reflects a compromise of competing positions and does not necessarily reflect any Petitioner's position with respect to any issues raised in these proceedings. This Settlement may not be cited as precedent in any future proceeding, except to the extent required to implement this Settlement.
22. Each term and condition set forth in this Settlement, whether or not set out in a numbered paragraph, shown in a table or other graphic presentation, bolded, italicized, or otherwise emphasized, or set forth in the body, a footnote, a parenthetical, an appendix, an exhibit, or otherwise, is material consideration to the entry into this Settlement by the signatory parties.
23. Unless otherwise expressly indicated, all terms and conditions contained herein shall take effect upon issuance of a final order in this proceeding, without the need or requirement for additional Commission review or approval.
24. The Joint Petitioners stipulate to the Proposed Findings of Fact attached hereto as Appendix A. The Joint Petitioners further agree that the facts set forth in Appendix A are sufficient to find that the Settlement is in the public interest.
25. If the ALJ recommends approval of the Settlement without modification, the Joint Petitioners will waive their rights to file Exceptions.

IV. REQUEST FOR RELIEF

WHEREFORE, Pennsylvania-American Water Company, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania, the Office of Consumer Advocate, and the Office of Small Business Advocate, by their respective counsel, respectfully request that Honorable Administrative Law Judge Mark A. Hoyer recommend approval of, and the Commission approve, this Joint Petition for Settlement of All Issues as submitted, including all terms and conditions thereof, without modification.

Respectfully submitted,

/s/ John W. Sweet

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LIST OF APPENDICES

- A. Proposed Findings of Fact
- B. Proposed Conclusions of Law
- C. Proposed Ordering Paragraphs
- D. Statement in Support of Pennsylvania-American Water Company
- E. Statement in Support of the Coalition for Affordable Utility Services and Energy Efficiency
- F. Statement in Support of the Office of Consumer Advocate
- G. Statement in Support of the Office of Small Business Advocate

Appendix A

Proposed Findings of Fact

1. Pennsylvania-American Water Company (“PAWC” or the “Company”) is a regulated public utility corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania, and is engaged in the business of collecting, treating, storing, supplying, distributing and selling water to the public, and collecting, treating, transporting and disposing of wastewater for the public.
2. In general, PAWC issues monthly bills to the majority of its water and wastewater customers. All residential customers are billed on a monthly basis. Some non-residential customers are billed on a quarterly basis instead.
3. Between August 26, 2024 and September 12, 2024, upgrades to two systems used for billing caused a technical issue that resulted in a subset of customers not receiving a paper bill or notification of their electronic bill (“Billing Delay”).
4. A numerical breakdown of the impacted accounts is below:

Time Period	Bills Created	Bills Sent As Normal	Print Bills Not Mailed	E-Bill Notification Not Sent
8/26/2024 - 9/12/2024	376,541	280,107	78,443	17,991

5. During this period, impacted customers could still view their bills and obtain copies through other means:
 - a. Bills could be viewed online on PAWC’s MyWater customer portal; and
 - b. If the customer called the Company’s Customer Service Center, Customer Care Agents could view bills, process payments, and mail paper bills to customers.

6. Once this technical issue was discovered, credits for any automatically assessed late payment charges and dunning locks to prevent collections activity, including any subsequent late payment charges, were placed on all impacted accounts through the end of 2024.
7. For all impacted accounts, the Company's next regularly scheduled bills issued to the customers as normal. If the customer did not make a payment during the prior billing period, the bill was for all water and/or wastewater usage from the last two billing periods.
8. In recognition of the fact that a larger balance due may have presented a challenge for lower income households, PAWC contributed an additional \$100,000 to its H2O Help to Others Hardship Fund.
9. Impacted customers from all customer classes were mailed a letter informing them that they could request a payment plan of up to 12 months through MyWater or by calling the Customer Service Center.
10. In the Petition, PAWC is requesting a limited waiver of 52 Pa. Code § 56.11(a) and Rules 10.1 and 8 of PAWC's water and wastewater tariffs for the period of August 26, 2024 to September 12, 2024.
11. PAWC determined that approximately 4,966 self-identified low-income customers were impacted by the Billing Delay. Since the Billing Delay, 26 of these customers applied for Hardship Fund grants, but were deemed ineligible.
12. In accordance with the Settlement, PAWC will conduct outreach to all of these customers and approve Hardship Fund grants for these customers as long as they are income-eligible (i.e., 250% of federal poverty income guidelines or below).

13. Since the Billing Delay, 77 of the 4,966 self-identified low-income customers enrolled in PAWC's Arrearage Management Program ("AMP").
14. In accordance with the Settlement, PAWC will conduct targeted outreach, including at least one letter and one email (if email address is available) to all 4,966 customers providing program details and instructions on how to apply for PAWC's customer assistance programs, including the Bill Discount Program, the Hardship Fund, and AMP (collectively, "Assistance Programs").
 1. In accordance with the Settlement, PAWC will update its Customer Assistance Advisory Group about the results of the outreach, including the number of affected customers who were enrolled in each low income program and the number of affected customers with outstanding balances dating back to the Billing Delay. Based on these numbers, PAWC will facilitate a discussion about whether additional outreach is needed.
 2. In accordance with the Settlement, when impacted customers contact the Company seeking a payment arrangement, PAWC's customer service representatives will ask about the customers' household size and income level to screen for potential eligibility for PAWC's Assistance Programs. If the customer responds affirmatively, they will be directed to contact PAWC's assistance program administrator, Dollar Energy Fund, to begin the application process for PAWC's Assistance Programs.

Appendix B

Proposed Conclusions of Law

1. The Commission has jurisdiction over the subject matter of this proceeding. 66 Pa. C.S. § 501(a); 52 Pa. Code § 5.43.
2. The Commission's regulations state that "a public utility shall render a bill once every billing period to every residential customer in accordance with approved rate schedules." 52 Pa. Code § 56.11(a).
3. "Billing period" is defined, in relevant part, as "in the case of water and wastewater service, a billing period may be monthly, bimonthly or quarterly as provided in the tariff of the public utility. Customers shall be permitted to receive bills monthly and be notified of their rights thereto." 52 Pa. Code § 56.2.
4. Pennsylvania-American Water Company's (PAWC" or the "Company") water tariff states that "the Company shall render a bill once every billing period to every Customer in accordance with approved rate schedules." Supplement No. 40 to Tariff Water-PA P.U.C. No. 5, Fourth Revised Page 58 (Rule 10.1).
5. PAWC's wastewater tariff provides "the Company shall render a bill once every billing period to every Customer in accordance with approved rate schedules." Supplement No. 43 to Tariff Wastewater PA P.U.C. No. 16, Fourth Revised Page 31 (Rule 8).
6. The Commission may grant a petition for waiver of regulations and/or tariff provisions that is in the public interest under the Commission's statutory authority to rescind or modify regulations or orders. *Petition of PECO Energy Company for Temporary Waiver of Regulations Related to the Required Days In a Billing Period*, Docket No. P-2014-2446292 (Order entered Dec. 4, 2014), p. 3; *see also* 66 Pa. C.S. § 501(a).

7. A petition for waiver of a Commission regulation must set forth the petitioner's interest, the relevant legal authority, the purpose of the petition, and the factual grounds for the waiver. 52 Pa. Code § 5.43.
8. Commission policy promotes settlements. 52 Pa. Code § 5.231.
9. A settlement lessens the time and expense that the parties must expend litigating a case and, at the same time, conserves precious administrative resources. The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully-litigated proceeding. 52 Pa. Code § 69.401.
10. In order to accept a settlement, the Commission must determine that the proposed terms and conditions are in the public interest. *Pa. Pub. Util. Comm'n v. York Water Co.*, Docket No. R-00049165 (Order entered Oct. 4, 2004); *Pa. Pub. Util. Comm'n v. C.S. Water & Sewer Assocs.*, 74 Pa. PUC 767 (1991).
11. PAWC's Petition, as modified by the Settlement, is in the public interest and, therefore, should be approved without modification.

Appendix C

Proposed Ordering Paragraphs

1. That the Honorable Administrative Law Judge Mark A. Hoyer recommend Commission approval of the *Nunc Pro Tunc* Petition of Pennsylvania-American Water Company (“PAWC”) for Limited Waiver of 52 Pa. Code § 56.11(a) and Related Tariff Provisions as modified by the Joint Petition for Settlement of All Issues.
2. That the Honorable Administrative Law Judge Mark A. Hoyer recommend that the Commission grant a limited waiver of 52 Pa. Code § 56.11(a) and PAWC’s related water and wastewater tariff provisions for the period of August 26, 2024 to September 12, 2024.

Appendix D
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

ADMINISTRATIVE LAW JUDGE MARK A. HOYER

Nunc Pro Tunc Petition of Pennsylvania-American Water Company for Limited Waiver of 52 Pa. Code § 56.11(a) and Related Tariff Provisions : : Docket No. P-2024-3051518

STATEMENT IN SUPPORT OF
PENNSYLVANIA-AMERICAN WATER COMPANY

Pennsylvania-American Water Company (“PAWC” or the “Company”) files this Statement in Support of the Joint Petition for Approval of Settlement of All Issues (“Settlement”) entered into by PAWC, the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”), the Office of Consumer Advocate (“OCA”), and the Office of Small Business Advocate (“OSBA”) (singularly, a “Petitioner” and collectively, the “Joint Petitioners”).¹ PAWC respectfully requests that Honorable Administrative Law Judge (“ALJ”) Mark A. Hoyer recommend approval of, and that the Commission approve, the Settlement, including all terms and conditions thereof, without modification.

I. INTRODUCTION

The Settlement pertains to the petition (the “Petition”) filed by PAWC seeking a limited *nunc pro tunc* waiver of 52 Pa. Code § 56.11(a) and Rules 10.1 and 8 of PAWC’s water and wastewater tariffs. The Settlement resolves all issues raised by the Joint Petitioners. Considering the diverse interests of the Joint Petitioners, this fact is itself strong evidence that the Settlement is

¹ The Commission’s Bureau of Investigation and Enforcement indicated that it does not oppose the Settlement.

reasonable and in the public interest. The Settlement was achieved through the hard work and perseverance of the Joint Petitioners. The Joint Petitioners fully explored the issues in this case and reached a carefully balanced compromise of the interests of the Joint Petitioners that satisfies the various requirements of the Public Utility Code.

For the reasons discussed in detail below, the Settlement is in the public interest and should be approved.

II. PROCEDURAL BACKGROUND

PAWC incorporates by reference Paragraphs 1-10 of the Settlement.

III. THE SETTLEMENT

A. LEGAL STANDARDS

Commission policy promotes settlements. *See* 52 Pa. Code § 5.231. Settlements lessen the time and expense that the parties must expend litigating a case and, at the same time, conserve precious administrative resources. The Commission has indicated that settlement results are often preferable to those achieved at the conclusion of a fully-litigated proceeding. *See* 52 Pa. Code § 69.401. In order to accept a settlement, the Commission must determine that the proposed terms and conditions are in the public interest. *Pa. Pub. Util. Comm'n v. York Water Co.*, Docket No. R-00049165 (Order entered Oct. 4, 2004); *Pa. Pub. Util. Comm'n v. C.S. Water and Sewer Assocs.*, 74 Pa. P.U.C. 767 (1991).

B. SETTLEMENT CONDITIONS

The Settlement requests that the Commission approve the Petition, which provides PAWC with a limited waiver of 52 Pa. Code § 56.11(a) and Rules 10.1 and 8 of PAWC's water and wastewater tariffs related to a billing system issue PAWC experienced between August 26, 2024 and September 12, 2024, which delayed the mailing of hard copy bills to a subset of customers ("Billing Delay"). The Settlement adopts several customer protections to help ensure that

customers will not be adversely impacted by the Billing Delay. The Settlement recognizes that PAWC offered 12-month payment arrangements to all customers impacted by the Billing Delay. When customers contact the Company seeking such a payment arrangement, PAWC will screen them for potential customer assistance program eligibility and refer them to the Company's customer assistance program administrator, Dollar Energy Fund, if relevant. Approximately 4,966 self-identified low-income customers experienced the Billing Delay. The Settlement provides for PAWC to conduct targeted outreach to these customers to provide information regarding the Company's customer assistance programs, the Bill Discount Program, the Hardship Fund, and the Arrearage Management Program. PAWC will contact 26 of these individuals who were deemed ineligible for the Hardship Fund previously to provide Hardship Fund grants if they remain income eligible. Finally, the Settlement recognizes PAWC's \$100,000 Hardship Fund contribution, which was contributed to assist low-income customers who may have faced bill payment issues as a result of the Billing Delay. Moving forward, PAWC will keep its Customer Assistance Advisory Group apprised of its outreach efforts and evaluate whether additional outreach efforts would be useful.

The Settlement is conditioned upon the Commission's approval of the terms and conditions contained in the Settlement without modification. If the Commission modifies the Settlement, any Petitioner may elect to withdraw from the Settlement and may proceed with litigation. In such event, the Settlement shall be void and of no effect. The Joint Petitioners acknowledge and agree that the Settlement, if approved, will have the same force and effect as if the Joint Petitioners had fully litigated this proceeding. This provision is standard in settlements in Commission proceedings. It protects all of the Joint Petitioners by allowing them to withdraw from the Settlement if the Commission modifies the Settlement in a way they find unacceptable.

IV. CONCLUSION

Through cooperative efforts and the open exchange of information, the Joint Petitioners have arrived at a settlement that resolves all of the issues in this proceeding in a fair and equitable manner. PAWC fully supports the Settlement and urges the ALJ and the Commission to approve it without modification.

WHEREFORE, Pennsylvania-American Water Company respectfully requests that the Honorable Administrative Law Judge Mark A. Hoyer recommend approval of, and that the Commission approve, the Settlement, including all terms and conditions thereof, without modification, and enter an order consistent with the Settlement.

Respectfully submitted,



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Counsel for *Pennsylvania-American
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September 19, 2025

Appendix E

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nunc Pro Tunc Petition of Pennsylvania- :
American Water Company for Limited : Docket No. P-2024-3051518
Waiver of 52 Pa. Code § 56.11(a) and :
Related Tariff Provisions :

**STATEMENT OF THE COALITION FOR AFFORDABLE UTILITY SERVICES
AND ENERGY EFFICIENCY IN PENNSYLVANIA IN SUPPORT OF THE JOINT
PETITION FOR SETTLEMENT**

PENNSYLVANIA UTILITY LAW PROJECT

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September 19, 2025

I. **INTRODUCTION**

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), a signatory party to the Joint Petition for Settlement (Joint Petition or proposed Settlement), by and through its counsel at the Pennsylvania Utility Law Project, respectfully requests that the terms and conditions contained therein be approved without modification by the Honorable Administrative Law Judge (ALJ) Mark A. Hoyer, and the Pennsylvania Public Utility Commission (Commission). For the reasons stated more fully below, CAUSE-PA believes that the terms and conditions of the proposed Settlement are in the public interest and should be approved.

CAUSE-PA intervened in this proceeding to protect the interests of low income customers of Pennsylvania-American Water Company (PAWC or the Company) who were impacted by a lapse in billing that occurred between August 26, 2024 and September 12, 2024, when upgrades to PAWC billing systems allegedly caused a technical issue that resulted in over 96,000 customers not receiving a paper bill or notification of their electronic bill. (CAUSE-PA Pet. to Intervene and Answer at ¶ 14a.) CAUSE-PA explained that it is generally supportive of PAWC’s proposal to waive late fees, place dunning locks on affected accounts, and contribute additional money to PAWC’s Hardship Fund to help address the financial strain caused by its billing lapse. (*Id.*) However, CAUSE-PA explained that further investigation and review was necessary to ensure that this proposed relief is adequate to protect low and moderate income customers from the negative impact of PAWC’s billing lapse and to ensure that PAWC’s proposed remediation does not create other unintended consequences to the accessibility and availability of PAWC’s existing universal service programs. (*Id.*)

CAUSE-PA and the other parties engaged in informal discovery and extensive negotiation to reach an agreement that would help ensure that PAWC’s low income customers who were

impacted by the billing lapse would be able to maintain service despite the impact of potentially being billed for multiple months of service at one time. Further, the parties worked to develop an agreement that would help prevent any additional hardships caused by the billing lapse from adversely affecting the availability of assistance for low income customers.

The proposed Settlement reasonably addresses a range of issues raised in CAUSE-PA's Petition to Intervene and Answer, and those raised by other parties. While CAUSE-PA's positions were not fully adopted, the resolution of these issues represents a fair and balanced approach which satisfies the many and varied interests of the Settling parties in a reasonable and just manner. As such, and for the specific reasons discussed in further depth below, CAUSE-PA asserts that the proposed Settlement is in the public interest and should be approved without modification.

II. BACKGROUND

For the purposes of this Statement in Support, CAUSE-PA adopts the background and procedural history set forth in Paragraphs 1-10 of the proposed Settlement.

III. TERMS AND CONDITIONS OF SETTLEMENT

For the reasons discussed below, CAUSE-PA asserts that the proposed Settlement presents a reasonably balanced resolution to the issues raised in this proceeding. CAUSE-PA urges the ALJs and the Commission to approve the proposed Settlement as a whole and without modification.

H2O Help to Others Hardship Fund (“Hardship Fund”)

In its Petition to Intervene and Answer, CAUSE-PA explained that it is generally supportive of PAWC's proposal to waive late fees, place dunning locks on affected accounts, and contribute additional money to PAWC's Hardship Fund to help address the financial strain caused by its billing lapse. (CAUSE-PA Pet. to Intervene and Answer at ¶ 14a.) However, CAUSE-PA

recommended further investigation and review to ensure that this proposed relief is adequate to protect low and moderate income customers from the negative impact of PAWC's billing lapse. (*Id.*) CAUSE-PA also explained the need to ensure that PAWC's proposed remediation does not create other unintended consequences to the accessibility and availability of PAWC's existing universal service programs. (*Id.*) CAUSE-PA cautioned that PAWC's proposed \$100,000 contribution is likely inadequate to address the financial hardship resulting from the billing lapse, which affected over 96,000 accounts, 4,966 of whom were low-income customers. (*Id.*; see Stipulation of Facts, Appendix A at ¶ 11.) CAUSE-PA explained that if PAWC's contribution to its Hardship Fund is inadequate to fully address the financial hardship created by the billing error, it will erode the availability of assistance intended to address hardships not associated with PAWC's errors. (CAUSE-PA Pet. to Intervene at ¶ 14a.) Since the billing lapse, 26 affected low income customers applied for Hardship Fund grants but were deemed ineligible. (Stipulation of Facts, Appendix A at ¶ 11)

Under the terms of the Settlement, PAWC will conduct outreach to all of these customers and approve Hardship Fund grants for these customers as long as they are income-eligible (*i.e.*, 250% of federal poverty income guidelines or below). (*Id.* at ¶ 15) In combination with PAWC's initial proposals and the additional terms listed below, this term of the Settlement will help ensure that affected customers are aware of, and able to access, PAWC's Hardship Fund to address the impact of the billing lapse. Thus, this term is just, reasonable, and in the public interest and should be approved.

Customer Assistance Program Outreach

While CAUSE-PA supports PAWC's proposal to place a dunning lock on affected accounts, we questioned the adequacy of the timeline for the locks, and recommended that PAWC

take additional steps to ensure that impacted households are able to avoid service termination associated with PAWC's billing errors once the dunning locks are removed. (CAUSE-PA Pet. to Intervene at ¶14b.)

Under the terms of the Settlement, PAWC will conduct targeted outreach, including at least one letter and one email (if email address is available) to all 4,966 customers providing program details and instructions on how to apply for PAWC's customer assistance programs, including the Bill Discount Program, the Hardship Fund, and AMP. (Settlement at ¶ 15.) PAWC will update its Customer Assistance Advisory Group (CAAG) about the results of the outreach, including the number of affected customers who were enrolled in each low income assistance program and the number of affected customers with outstanding balances dating back to the pancake bill incident. (*Id.* at ¶ 16) Based on these numbers, PAWC will facilitate a discussion about whether additional outreach is needed. (*Id.*)

Taken together with the other terms in the Settlement, these terms will help ensure that low income customers who have been affected by the billing lapse are connected to the appropriate assistance programs to help mitigate the impact of the billing lapse. These terms will also help ensure that PAWC's CAAG is able to stay informed about the status of the affected customers and assist with additional recommendations as necessary. These terms are just, reasonable, in the public interest, and should be approved.

Payment Arrangements

All customers impacted by the Billing Delay were sent a letter notifying them that they are eligible for a 12-month payment arrangement as a result of the Billing Delay. (Stipulation of Facts, Appendix A at ¶ 9). In its Petition to Intervene and Answer, CAUSE-PA explained that PAWC's proposed 12-month payment agreements are inadequate for low income customers, who already

face acute rate unaffordability and should not bear the compounding burden of an unaffordable payment arrangement as a result of PAWC's errors. (CAUSE-PA Pet. to Intervene at ¶ 15.) CAUSE-PA recommended additional steps be taken to protect PAWC's low income customers and ensure that PAWC's billing lapse does not cause undue hardship. (*Id.*) CAUSE-PA also pointed out that PAWC's Petition lacks critical detail necessary to determine how the proposed payment arrangements would apply to accounts with existing arrears and/or existing payment arrangements which predate the billing errors. (*Id.*)

Under the terms of the Settlement, if such customers previously defaulted on a Company or Commission payment arrangement, PAWC will authorize a new payment arrangement for these customers. (Settlement at ¶ 17) When impacted customers contact the Company seeking a payment arrangement, PAWC's customer service representatives will ask about the customers' household size and income level to screen for potential eligibility for PAWC's low-income programs. (*Id.* at ¶ 18) If the customer responds affirmatively, they will be directed to contact PAWC's assistance program administrator, Dollar Energy Fund, to begin the application process for PAWC's Bill Discount and Arrearage Management Programs and/or to apply for a Hardship Fund grant. (*Id.*)

These terms ensure that low income customers seeking payment arrangements will be screened for eligibility for PAWC's Bill Discount and Arrearage Management Programs, which will help them address their arrearages and affordability challenges. In addition, the provision contained in Paragraph 17 of the Settlement will help customers to better address payment difficulties which may occur as a result of PAWC's billing errors by providing impacted customers with access to payment arrangements, even if they have previously defaulted on a payment arrangement. These terms are just, reasonable, and in the public interest and should be approved.

IV. THE SETTLEMENT IS IN THE PUBLIC INTEREST

The Commission's regulations lend unambiguous support for settlements and declare: "It is the policy of the Commission to encourage settlements." 52 Pa. Code § 5.231. The Commission has also set explicit policy guiding settlement of a major rate case, explaining in its codified statement of policy that "the results achieved from a negotiated settlement or stipulation, or both, in which the interested parties have had an opportunity to participate are often preferable to those achieved at the conclusion of a fully litigated proceeding." 52 Pa. Code § 69.401. Settlements are preferred, at least in part, because they "lessen the time and expense that Parties must expend litigating a case and, at the same time, conserve resources." See *Commonwealth of Pa. et al. v. IDT Energy, Inc.*, Docket No. C-2014-2427657, at 35-37 (Tentative Order entered June 30, 2016). In reviewing whether to approve a proposed settlement, the Commission must determine whether the terms and conditions are in the public interest based on a preponderance of the evidence "showing a likelihood or probability of public benefits that need not be quantified or guaranteed." See *id.* (quoting *Popowsky v. Pa. PUC*, 594 Pa. 583, 937 A.2d at 1040 (2007)). Historically, the Commission has defined the public interest as inclusive of ratepayers, shareholders, and the regulated community at large. See *id.* (citing *Pa. PUC v. Bell Atlantic Pennsylvania, Inc.*, Docket No. R-00953409 (Order entered Sept. 29, 1995)). Of course, proposed settlement terms must also be consistent with applicable law. See *id.* (citing *Dauphin County Indus. Dev. Auth. v. Pa. PUC*, 2015 Pa. Commw. LEXIS 381 (Sept. 9, 2015)).

The proposed Settlement was achieved by the Joint Petitioners after an investigation of PAWC's filings, and informal discovery, and extensive negotiation and consideration by the Joint Petitioners.. The proposed Settlement was developed after.

CAUSE-PA asserts that the proposed Settlement is in the public interest. The proposed Settlement represents a balanced compromise of the issues raised by the Settling parties and amicably resolves a substantial number of issues raised in this proceeding, thereby avoiding additional costly litigation on these issues. The proposed Settlement is consistent with Commission rules and practice encouraging settlements, set forth in 52 Pa. Code §§ 5.231, 69.391, 69.401-69.406, and is supported by substantial record evidence. For these reasons, and the reasons set forth throughout this Statement in Support, CAUSE-PA submits the proposed Settlement is just, reasonable, in the public interest, and should be approved without modification.

V. CONCLUSION

The proposed Settlement was achieved by the Joint Petitioners after an investigation of PAWC's filing and extensive negotiations amongst the parties. CAUSE-PA asserts that the proposed Settlement is a reasonable resolution to a variety of complex issues, is in the public interest, and should be approved. Acceptance of the proposed Settlement avoids the necessity of further administrative and possible appellate proceedings about the settled issues – which would have been undertaken at a substantial cost to the Joint Petitioners. Accordingly, CAUSE-PA respectfully requests that the Honorable ALJ Hoyer, and the Commission approve the proposed Settlement in its entirety and without modification.

Respectfully submitted,

PENNSYLVANIA UTILITY LAW PROJECT
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Date: September 19, 2025

Appendix F
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nunc Pro Tunc Petition of Pennsylvania- :
American Water Company for Limited :
Waiver of 52 Pa. Code § 56.11(a) and : Docket No. P-2024-3051518
Related Tariff Provisions :

STATEMENT IN SUPPORT
OF THE JOINT PETITION FOR SETTLEMENT OF ALL ISSUES
OF THE OFFICE OF CONSUMER ADVOCATE

TO THE HONORABLE ADMINISTRATIVE LAW JUDGE MARK A. HOYER:

AND NOW, before the Honorable Administrative Law Judge Mark A. Hoyer, and the Pennsylvania Public Utility Commission (Commission), the Office of Consumer Advocate (OCA), a signatory to the Joint Petition for Settlement of All Issues (Settlement) in the captioned proceeding, submits this Statement in Support of the Settlement, requesting approval of the terms and conditions of the Settlement as being supported by substantial record evidence and in the public interest.

I. INTRODUCTION

A. Description of the Office of Consumer Advocate

The OCA is a statutory advocate with the authority and duty to represent the interest of consumers as a party before the Commission in public utility rate requests. 71 P.S. § 309-4.

B. Procedural Background

On October 3, 2024, PAWC filed the Petition for Limited Waiver of 52 Pa. Code § 56.11(a) and Rules 10.1 and 8 of PAWC's water and wastewater tariffs.

On October 23, 2024, CAUSE-PA filed a Petition to Intervene and Answer. On October 23, 2024, the Office of Small Business Advocate ("OSBA") filed a Notice of Intervention and a Notice of Appearance. On November 21, 2024, OCA filed a Notice of Intervention. On January 21, 2025, I&E filed a Notice of Appearance.

On November 12, 2024, PAWC filed Preliminary Objections. On November 22, 2024, CAUSE-PA filed an Answer to PAWC's Preliminary Objections.

On December 20, 2024, the Commission scheduled a prehearing conference for January 15, 2025, before Administrative Law Judge ("ALJ") Mark A. Hoyer.

On January 14, 2025, CAUSE-PA and PAWC filed a Joint Motion requesting (a) to cancel the prehearing conference; (b) to engage in settlement discussions among the parties and provide monthly status reports to the ALJ; and (c) to postpone any ruling on PAWC's Preliminary Objections until settlement discussions conclude.

On August 21, 2025, PAWC notified ALJ Hoyer that the parties agreed to a settlement in principle.

Concurrent with the Settlement, the parties are separately filing a Joint Stipulation of Facts. Joint Stipulation of Facts, Appendix A.

The OCA now submits this Statement in Support of the Settlement. As explained below, the OCA submits that the Settlement is in the public interest and should be approved without modification.

II. STANDARDS FOR APPROVAL OF SETTLEMENT

A. Settlements must be in the public interest and the Commission must give due consideration to the interests of consumers.

The policy of the Commission is to encourage settlements. 52 Pa. Code § 5.231. In order to accept a settlement such as proposed here, the Commission must determine that the proposed terms and conditions are in the public interest. *Pa. PUC v. City of Bethlehem – Water Dept.*, Docket No. R-2020-3020256 (Order entered April 15, 2021) (*City of Bethlehem*) at 13 (citing *Pa. PUC v. York Water Co.*, Docket No. R-00049165 (Order entered October 4, 2004); *Pa. PUC v. C. S. Water and Sewer Assoc.*, 74 Pa. P.U.C. 767 (1991) (*CS Water and Sewer*)). “It is the Commission’s duty to determine the public interest and to protect the rights of the public.” *Duquesne Light Co. v. Pa. PUC*, 715 A.2d 540, 546 (Pa. Cmwlth. Ct. 1998) (citations omitted). Consistent with the Commission’s other statutory responsibilities, the Commission must determine the public interest with “due consideration to the interests of consumers.” 71 P.S. § 309-5.

B. Burden of Proof

Proponents of an order bear the burden of proof. 66 Pa.C.S. § 332(a). Because the Joint Petitioners request that the Commission enter an order adopting the settlement without modification, they share the burden of proof to show that the terms and conditions of the settlement are in the public interest. 66 Pa.C.S. § 332(a); *Pa. PUC v. City of Bethlehem – Water Dept.*, Docket No. R-2020-3020256 (Order entered April 15, 2021) (*City of Bethlehem*) at 13.

III. SETTLEMENT TERMS AND CONDITIONS

In its Petition, PAWC seeks a waiver of Section 56.11(a) of the Commission’s regulations and related tariff provisions in PAWC’s tariff. Petition at 1.¹ From August 26, 2024 through September 12, 2024, PAWC stated in its Petition that “upgrades to two systems used for billing caused a technical issue that resulted in a subset of customers not receiving a paper bill or notification of their electronic bill.”² Of the 376,541 bills created, 280,107 were sent as normal; 78,443 print bills were not mailed; and 17,991 e-bill notifications were not sent.³ Customers were able to view their bills online and a customer care agent was able to view the bills, process payments, and mail paper copies of bills to customers.⁴ For all impacted accounts, at the time of the filing of the Petition, the Company’s next regularly scheduled bills were issued or would be issued as normal.⁵ PAWC stated in its Petition that “[t]o avoid customer confusion, PAWC does not intend to mail copies of the bills that did not go out between August 26, 2024 and September 12, 2024.”⁶ The Petition provided that “[i]f the customer did not make a payment during the prior billing period, the bill will be for all water and/or wastewater usage from the last two billing periods.”⁷ Customers would not be responsible for late payment charges for the period.⁸

Section 56.11(a) of the Commission’s regulations provides that a “public utility shall render a bill once every billing period to every residential customer in accordance with approved rate schedules.” 52 Pa. Code §56.11(a). Rules 10. 1 and 8 of PAWC’s water and wastewater

¹ The parties have stipulated in the Joint Stipulation of Facts to the admission of PAWC’s Petition for Limited Waiver.

² Petition at ¶ 7.

³ Petition at ¶ 8.

⁴ Petition at ¶ 9.

⁵ Petition at ¶ 11.

⁶ Petition at ¶ 21.

⁷ Petition at ¶ 11.

⁸ *Id.*

tariffs,⁹ respectively, require the Company to render a bill once every billing period to every customer in accordance with the applicable rate schedule.¹⁰ PAWC seeks a limited waiver of the billing requirement as set forth in the Commission’s regulations and PAWC’s tariffs for when a subset of customers were not mailed copies of the bills or electronically notified.¹¹

The Settlement is in addition to the steps that PAWC has already taken to resolve the impact of the billing issues. The Petition provided the steps that the Company voluntarily took subsequent to the technical issue being discovered.¹² The voluntary steps that PAWC took included:

- (1) “credits for any automatically assessed late payment charges and dunning locks to prevent collections activity, including any subsequent late payment charges” placed on the accounts through the end of 2024;
- (2) “[i]n recognition of the fact that a larger balance due may present a challenge for lower income households, PAWC contributed an additional \$100,000 to its H2O Help to Others Hardship Fund;”¹³ and
- (3) Customers could also request a payment plan of up to 12 months through the MyWater portal or contacting the Customer Service Center. Impacted customers would receive a letter notifying them that the payment arrangement was available.¹⁴

The Commission encourages settlement, and to do so, it must recognize the balance of compromises struck by settling parties. The OCA submits that the Settlement is a reasonable compromise in conjunction with the steps already taken by PAWC. The OCA submits that the Settlement is in the public interest and supports Commission approval of the Settlement without modification.

⁹ Supplement No. 40 to Tariff Water- PA P.U.C. No. 5, Fourth Revised Page 58 (Rule 10.1); Supplement No. 43 to Tariff Wastewater PA P.U.C. No. 16, Fourth Revised Page 31 (Rule 8).

¹⁰ Petition at ¶¶ 4-5.

¹¹ Petition at ¶ 18.

¹² Petition at ¶¶ 10, 12-13.

¹³ The fund is available to any impacted customers at or below 250% of the Federal Poverty Level (FPL). Petition at ¶ 22.

¹⁴ Petition at ¶ 13,

A. H2O Help to Others Hardship Fund (“Hardship Fund”) (Settlement at ¶¶13-14)

Paragraphs 13 and 14 of the Settlement state:

Between August 26, 2024 and September 12, 2024, upgrades to two systems used for billing caused a technical issue that resulted in a subset of customers not receiving a paper bill or notification of their electronic bill (“Billing Delay”), which is the subject of the above-referenced Petition. In recognition of the fact that a larger balance due may present a challenge for lower income households, PAWC contributed an additional \$100,000 to its Hardship Fund.

PAWC determined that approximately 4,966 self-identified low-income customers were impacted by the Billing Delay. Since the Billing Delay, 26 of these customers applied for Hardship Fund grants, but were deemed ineligible. PAWC will conduct outreach to all of these customers and approve Hardship Fund grants for these customers as long as they are income-eligible (i.e., 250% of federal poverty income guidelines or below).

Settlement ¶¶ 13-14.

As noted above, the Company voluntarily contributed an additional \$100,000 to its Hardship Fund. The OCA supports the proposed additional outreach to inform self-identified low-income customers about the availability of the Hardship Fund. The billing system error may have created a payment hardship to customers that they are still working to overcome and additional notice of the availability of funds through the Hardship Fund grants will provide an additional pathway for customers to be able to access assistance and to maintain water and/or wastewater service. The OCA recommends that the proposal be approved as being in the public interest.

B. Customer Assistance Program Outreach (¶¶ 15-16)

The Settlement provides that since the billing delay 77 of the 4,966 self-identified low-income customers have enrolled in PAWC's Arrearage Management Program (AMP).¹⁵

Paragraphs 15-16 of the Settlement state:

15. PAWC will conduct targeted outreach, including at least one letter and one email (if email address is available) to all 4,966 customers providing program details and instructions on how to apply for PAWC's customer assistance programs, including the Bill Discount Program, the Hardship Fund, and AMP.

16. PAWC will update its Customer Assistance Advisory Group about the results of the outreach, including the number of affected customers who were enrolled in each low income program and the number of affected customers with outstanding balances dating back to the pancake bill incident. Based on these numbers, PAWC will facilitate a discussion about whether additional outreach is needed.

Settlement ¶¶ 15-16.

The Settlement further provides that the Company will commit to additional outreach to impacted customers about PAWC's available resources including the Bill Discount program, the Hardship Fund, and the AMP to assist with bill payment troubles potentially exacerbated or generated by the billing system error. The Company will also involve its Customer Assistance Advisory Group after the conclusion of the additional outreach to report on the "number of affected customers who were enrolled in each low income program and the number of affected customers with outstanding balances dating back to the pancake bill incident."¹⁶ The OCA supports the proposed additional outreach to customers and then reporting to the Customer Assistance Advisory Group about the efficacy of the outreach and soliciting assistance regarding whether additional outreach measures may be necessary. The term acknowledges the additional challenges that the billing delay incident may have had on low-income customers and provides outreach in order to

¹⁵ Settlement at ¶ 15.

¹⁶ Settlement at ¶ 16.

try to address the problem. It then provides a forum to address whether additional outreach is needed and leverages the collective knowledge of the Advisory Group to try to address the issue. The OCA submits that the proposed additional outreach serves the public interest and should be approved.

C. Payment Arrangements (¶¶ 17-18)

Paragraphs 17-18 of the Settlement state:

17. All customers impacted by the Billing Delay were sent a letter on October 4, 2024 notifying them that they are eligible for a 12-month payment arrangement as a result of the Billing Delay. If such customers previously defaulted on a Company or Commission payment arrangement, PAWC will authorize a new payment arrangement for these customers.

18. When impacted customers contact the Company seeking a payment arrangement, PAWC's customer service representatives will ask about the customers' household size and income level to screen for potential eligibility for PAWC's low-income programs. If the customer responds affirmatively, they will be directed to contact PAWC's assistance program administrator, Dollar Energy Fund, to begin the application process for PAWC's Bill Discount and Arrearage Management Programs and/or to apply for a Hardship Fund grant.

Settlement ¶¶ 17-18.

The OCA supports the proposal to offer to customers who may have defaulted on a Company or Commission payment arrangement an additional 12-month payment arrangement. The OCA also supports an inquiry to assess whether the customer may be eligible for low-income program assistance and referral to the Dollar Energy Fund. The proposal will provide additional tools and resources to help address the long-term impacts of the billing delay on all customers and provide information about available resources to eligible low-income customers. The OCA submits that the proposed terms should be approved as serving the public interest.

IV. CONCLUSION

The OCA submits that the terms and conditions of the proposed Settlement, in addition to the steps already taken, represent a fair and reasonable resolution of the issues and claims arising in this proceeding. The OCA further submits that, for the reasons detailed above, the Commission should approve the Settlement without modification as it is in the public interest.

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Respectfully submitted,

/s/ Christy M. Appleby
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Dated: September 19, 2025

Appendix G
BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

Nunc Pro Tunc Petition of Pennsylvania	:	Docket Nos.
American Water Company for Limited	:	P-2024-3051518 (Water)
Waiver of 52 Pa. Code § 56.11(a) and	:	P-2024-3051518 (Wastewater)
Related Tariff Provisions	:	

STATEMENT IN SUPPORT OF THE
JOINT PETITION FOR APPROVAL OF SETTLEMENT OF ALL ISSUES
ON BEHALF OF THE OFFICE OF SMALL BUSINESS ADVOCATE

I. Introduction

The Small Business Advocate is authorized and directed to represent the interests of the small business consumers of utility services in the Commonwealth of Pennsylvania under the provisions of the Small Business Advocate Act, Act 181 of 1988, 73 P.S. §§ 399.41 - 399.50. Pursuant to that statutory authority, the Office of Small Business Advocate (“OSBA”) filed a notice of intervention in response to the *Nunc Pro Tunc* Petition of Pennsylvania-American Water Company (“PAWC” or the “Company”) for Limited Waiver of 52 Pa. Code § 56.11(a) and Related Tariff Provisions (“Petition”) that was filed with the Pennsylvania Public Utility Commission (“Commission”) on October 3, 2024.

The OSBA actively participated in the negotiations that led to the proposed settlement and is a signatory to the Joint Petition for Approval of Settlement of All Issues (“*Joint Petition*”). The *Joint Petition* addresses the issues raised by this office in this proceeding. Therefore, the OSBA submits this statement in support of the *Joint Petition*.

II. The Commission's Policy on Settlements

Section 5.231(a) of the Commission's regulations, 52 Pa. Code § 5.231(a) (Formal Proceedings; Hearings; Settlement and Stipulations; Offers of Settlement) states, as follows:

It is the policy of the Commission to encourage settlements.

Similarly, Section 69.401 of the Commission's regulations, 52 Pa. Code § 69.104 (Settlement Guidelines and Procedures for Major Rate Cases – Statement of Policy; General) states, as follows:

In the Commission's judgment, the results achieved from a negotiated settlement or stipulation, or both, in which the interested parties have had an opportunity to participate are often preferable to those achieved at the conclusion of a fully litigated proceeding.

III. The Joint Petition is in the Public Interest of PAWC's Small Business Customers

From August 26, 2024, through September 12, 2024, upgrades to two systems used by PAWC for customer billing caused a technical issue that resulted in some of the Company's customers not receiving a paper bill or notification of their electronic bill. The OSBA's focus in this proceeding has been to make certain that any small businesses impacted by PAWC's billing failures were not penalized with over-charges, late fees, and terminations for failure to pay in a timely manner.

The *Joint Petition* addresses the OSBA's issue by proposing the following term:

All customers impacted by the Billing Delay were sent a letter on October 4, 2024 notifying them that they are eligible for a 12-month payment arrangement as a result of the Billing Delay. If such customers previously defaulted on a Company or Commission payment arrangement, PAWC will authorize a new payment arrangement for these customers.

Joint Petition, Paragraph 17.

The OSBA respectfully submits that this is a just and reasonable resolution of this issue, as it allows affected small businesses to avail themselves of a 12-month payment arrangement. This option for PAWC's small businesses should minimize, if not eliminate, any penalties that might have accrued of those affected by the Company's billing failure.

IV. Conclusion

Therefore, for the reasons set forth in the *Joint Petition*, as well as the issue set forth in this statement, the OSBA supports the proposed *Joint Petition* and respectfully requests that the ALJ and the Commission approve the *Joint Petition* in its entirety.

Respectfully submitted,

/s/ Steven C. Gray

Steven C. Gray
Senior Attorney
Assistant Small Business Advocate
Attorney ID No. 77538

Commonwealth of Pennsylvania
Office of Small Business Advocate
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Harrisburg, PA 17101

Dated: September 19, 2025

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: *Nunc Pro Tunc* Petition of :
Pennsylvania-American Water Company for : Docket No. P-2024-3051518
Limited Waiver of 52 Pa. Code § 56.11(a) :
and Related Tariff Provisions :

CERTIFICATE OF SERVICE

I hereby certify that I have on this day served a true copy of the foregoing Joint Petition for Approval of Settlement of All Issues upon the parties, listed below in accordance with the requirements of 52 Pa. Code §1.54 (relating to service by a party).

Service in the manner listed below addressed as follows:

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Barrett Sheridan, Assistant Consumer Advocate
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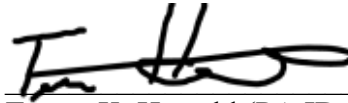
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