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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 Stipulation of Fact.

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**

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**HONORABLE ADMINISTRATIVE LAW JUDGE  
MARK A. HOYER**

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*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

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**JOINT STIPULATION OF FACT**

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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”) (collectively, the “Stipulating Parties”) file this Joint Stipulation of Fact (“Stipulation”) in the above-captioned proceeding.<sup>1</sup> In support of the Stipulation, the Stipulating Parties represent as follows:

**I. PROCEDURAL HISTORY**

1. The Stipulating Parties adopt the Procedural History as set forth in Paragraphs 1-10 of the Settlement.

**II. STIPULATION**

2. Considering that the Stipulating Parties have reached a Settlement prior to the introduction of any testimony in this matter, and in view of the need for substantial evidence

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<sup>1</sup> All Stipulating Parties are also Signatories to the “Joint Petition for Approval of Unanimous Settlement of All Issues” (“Settlement”), to be filed contemporaneously with the instant Stipulation.

supporting the decision of the ALJ and the Commission, the Stipulating Parties hereby jointly stipulate to the veracity of the facts set forth in **Appendix A**.

3. In addition, the Stipulating Parties agree to admit the Petition to Intervene and Answer filed by CAUSE-PA on October 23, 2024 into the record.

4. The Stipulating Parties waive cross-examination of witnesses.

5. This Stipulation is presented by the Stipulating Parties in conjunction with the Settlement, which is intended to settle all issues in the above-captioned proceeding. If the Commission rejects or otherwise modifies the Settlement, the Stipulating Parties reserve their respective procedural rights to submit testimony and exhibits, and cross-examine witnesses at on-the-record evidentiary hearings.

6. This Stipulation is being presented in conjunction with the Settlement only to resolve issues in the above-captioned proceeding. Regardless of whether this Stipulation is approved, no adverse inference shall be drawn, nor shall prejudice result to any Stipulating Party in this or any future proceeding as a consequence of this Stipulation, or any of its terms or conditions.

7. Attached hereto as **Appendix B** is a proposed “Order Granting Joint Stipulation of Fact” for consideration by the Honorable Administrative Law Judge Mark A. Hoyer.

WHEREFORE, the Stipulating Parties, by their respective counsel, respectfully request that the Honorable Administrative Law Judge Mark A. Hoyer approve this Joint Stipulation of Fact.

Respectfully submitted,

/s/ John W. Sweet

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Counsel for *Coalition for Affordable Utility  
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/s/ Christy M. Appleby

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/s/ Steven Gray

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## **LIST OF APPENDICES**

- A. Stipulated Facts
- B. Order Approving Joint Stipulation of Fact

## Appendix A

### Stipulated Facts

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:

| <b>Time Period</b>    | <b>Bills Created</b> | <b>Bills Sent As Normal</b> | <b>Print Bills Not Mailed</b> | <b>E-Bill Notification Not Sent</b> |
|-----------------------|----------------------|-----------------------------|-------------------------------|-------------------------------------|
| 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").
15. 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.
16. 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**

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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**HONORABLE ADMINISTRATIVE LAW JUDGE  
MARK A. HOYER**

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*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

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**ORDER GRANTING STIPULATION OF FACT**

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On September 19, 2025, 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”) (collectively, the “Stipulating Parties”) filed this Joint Stipulation of Fact (“Stipulation”) in the above-captioned proceeding. Each of the Stipulating Parties agreed to the veracity of the facts as listed in **Appendix A** of the Stipulation in order to provide the Pennsylvania Public Utility Commission with the factual basis necessary for approving the "Joint Petition for Settlement of All Issues" ("Settlement"), also filed on September 19, 2025. The Stipulation is attached to this Order.

As this request is reasonable, it will be granted.

**THEREFORE, IT IS ORDERED:**

1. That the Stipulation, filed on September 19, 2025, is APPROVED; and

2. The facts listed therein are admitted into the record of this proceeding on the terms and conditions set forth in the Stipulation.

Date: \_\_\_\_\_

\_\_\_\_\_  
Mark A. Hoyer  
Administrative Law Judge

**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 Stipulation of Fact 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:**

Christy Appleby, Senior Assistant Consumer Advocate  
Barrett Sheridan, Assistant Consumer Advocate  
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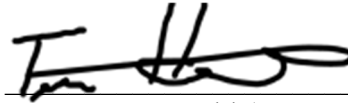
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Dated: September 19, 2025



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