



2025 Implementation Plan
Greater Hazleton CAN DO, Inc.

2025 Management and Operations Audit Report

PA PUC Bureau of Audits

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Introduction

Greater Hazleton CAN DO, Inc. (CAN DO) is pleased to present the Implementation Plan outlined below in response to the 2025 PUC Management and Operations Audit Report. The goal of this Implementation Plan is to outline the strategic approach, key activities, and timelines for the successful execution of initiatives under the Bureau of Audits' recommendations. This plan serves as a roadmap to ensure alignment with regulatory requirements, stakeholder expectations, and organizational goals.

CAN DO is committed to enhancing service reliability, operational efficiency, and sustainability across its utility operations. This Implementation Plan presents a structured approach for executing actions in accordance with regulatory mandates and strategic objectives. It delineates the essential activities, timelines, and governance mechanisms required to ensure effective delivery and operational alignment. The plan serves as a foundational document to guide resource deployment, monitor progress, and uphold transparency throughout the implementation process.

CAN DO acknowledges the value this audit brings to both the organization and the customers we serve.

Section II. Financial Management

II - Recommendation IV-1: Fully document financial management policies and procedures and establish a process to regularly review and update them that ensures version controls are in place.

RESPONSE: Accepted

ACTION: CAN DO plans to replace the informal financial management policies and procedures with a formal document that is updated on a regular basis using version controls.

RESPONSIBLE PARTY: Patricia Gendler - Chief Financial Officer

EXPECTED IMPLEMENTATION DATE: Fourth quarter of 2026.

Section III. Water and Wastewater Operations

III – Recommendation V-1: Expand the Damage Prevention Manual to include recommended improvements such as version control, emergency contact information, and training requirements.

RESPONSE: Accepted

ACTION: CAN DO will expand the Damage Prevention Manual to include recommended improvements.

RESPONSIBLE PARTY: Raiana Nichols - Director of Utilities

EXPECTED IMPLEMENTATION DATE: Second quarter of 2026.

III – Recommendation V-2: Create a 50-year prediction for replacement needs and use this to add specific main replacement goals to the Company’s next long-term plan.

RESPONSE: Accepted

ACTION: CAN DO plans to improve the Long-Term Infrastructure Improvement Plan to include a 50-year prediction for replacement needs and goals.

RESPONSIBLE PARTY: Raiana Nichols - Director of Utilities

EXPECTED IMPLEMENTATION DATE: Second quarter of 2028.

III – Recommendation V-3: Develop a plan to incorporate a staffing resource assessment into future large projects to increase available resources.

RESPONSE: Accepted

ACTION: CAN DO will integrate a staffing resources assessment into the early planning stages of all future large projects that includes evaluating required skill sets, workload projections, and current staffing capacity to ensure adequate coverage.

RESPONSIBLE PARTY: Raiana Nichols - Director of Utilities

EXPECTED IMPLEMENTATION DATE: Second quarter of 2026.

III – Recommendation V-4: Establish testing frequency for meters within Company policies and ensure documentation is retained for any meter tested.

RESPONSE: Accepted

ACTION: CAN DO entered a 15-year meter replacement and maintenance contract on 12/20/2023 that includes compliance with 52 PA Code Section 65.8, which governs meter testing frequency. In addition, CAN DO will develop an internal document to track meter age and calibration testing status to ensure proper documentation is maintained for all meters tested.

RESPONSIBLE PARTY: Raiana Nichols- Director of Utilities

EXPECTED IMPLEMENTATION DATE: Second quarter of 2027.

III – Recommendation V-5: Create valve testing policies that establish frequency and retain valve exercise records.

RESPONSE: Accepted

ACTION: CAN DO will create a valve testing policy that establishes frequency and retains valve exercise records.

RESPONSIBLE PARTY: Raiana Nichols - Director of Utilities

EXPECTED IMPLEMENTATION DATE: Second quarter of 2027.

Section IV. Emergency Preparedness

** NOTE: Due to the sensitive nature of the information in this section, answers will be provided in generalities.*

IV – Recommendation VI-1: Correct moderate deficiencies in physical security and safety equipment.

RESPONSE: Accepted

ACTION: CAN DO plans to correct deficiencies.

RESPONSIBLE PARTY: Raiana Nichols - Director of Utilities

EXPECTED IMPLEMENTATION DATE: Second quarter of 2026.

IV – Recommendation VI-2: Add revision history and accountability sections to the Physical Security Plan, Emergency Response Plan, Business Continuity Plan, and Cybersecurity Plan, and document the lifecycle management program in the Cybersecurity Plan.

RESPONSE: Accepted

ACTION: CAN DO will begin tracking revision dates on the Physical Security Plan, Emergency Response Plan, Business Continuity Plan, and Cybersecurity Plan, and document the lifecycle management program in the Cybersecurity Plan.

RESPONSIBLE PARTY: IT Consultant, Melissa Frederick - Administrative Coordinator, and Raiana Nichols - Director of Utilities

EXPECTED IMPLEMENTATION DATE: Second quarter of 2026.

IV – Recommendation VI-3: Conduct regular tabletop exercises and/or drills to test the Physical Security Plan, Emergency Response Plan, Business Continuity Plan, and Cybersecurity Plan.

RESPONSE: Accepted

ACTION: CAN DO will investigate tabletop exercises to test the Physical Security Plan, Emergency Response Plan, Business Continuity Plan, and Cybersecurity Plan.

RESPONSIBLE PARTY: IT Consultant, Melissa Frederick - Administrative Coordinator, and Raiana Nichols - Director of Utilities

EXPECTED IMPLEMENTATION DATE: Fourth quarter of 2026.

IV – Recommendation VI-4: Conduct regular vulnerability assessments and risk analyses.

RESPONSE: Accepted

ACTION: CAN DO will formalize its existing assessments and will include risk analysis as part of emergency preparedness for yearly reviews and updates.

RESPONSIBLE PARTY: IT Consultant, Melissa Frederick – Administrative Coordinator, and Raiana Nichols – Director of Utilities

EXPECTED IMPLEMENTATION DATE: Cyber Security: Implemented.

Emergency Response, Business Continuity, Physical Security:

Fourth quarter of 2026.

IV – Recommendation VI-5: Establish a mobile device usage policy to define the practices required to regulate the security of personally-owned mobile devices connecting to the Company’s intranet and computer systems.

RESPONSE: Accepted

ACTION: CAN DO will incorporate an Acceptable Use Policy for mobile devices within the Cyber Security Plan.

RESPONSIBLE PARTY: IT Consultant, Melissa Frederick - Administrative Coordinator, Governance Committee

EXPECTED IMPLEMENTATION DATE: Fourth quarter of 2025.

IV – Recommendation VI-6: Establish specific security requirements for the security measures defined in the Physical Security Plan and review the plan for potential new security measures.

RESPONSE: Accepted

ACTION: CAN DO will include specific security requirements for the security measures defined in the Physical Security Plan and review the plan for potential new security measures.

RESPONSIBLE PARTY: Raiana Nichols - Director of Utilities

EXPECTED IMPLEMENTATION DATE: Second quarter of 2026.

IV – Recommendation VI-7: Install preventative measures to protect against falls near aerated tanks.

RESPONSE: Accepted

ACTION: CAN DO will install preventative measures to protect against falls near aerated tanks.

RESPONSIBLE PARTY: Raiana Nichols - Director of Utilities

EXPECTED IMPLEMENTATION DATE: Fourth quarter of 2025.

IV - Recommendation VI-8: Rank the IT systems and components by criticality and use this ranking to prioritize future upgrades to cybersecurity.

RESPONSE: Accepted

ACTION: CAN DO will develop a formal ranking of IT systems and components based on their criticality. This ranking will be used to guide and prioritize future upgrades and cybersecurity enhancements.

RESPONSIBLE PARTY: IT Consultant, Melissa Frederick - Administrative Coordinator

EXPECTED IMPLEMENTATION DATE: Fourth quarter of 2026.

IV – Recommendation VI-9: Select and implement a cybersecurity maturity model.

RESPONSE: Accepted

ACTION: CAN DO IT Consultant, in conjunction with the Administrative Coordinator, will research and select an appropriate cybersecurity maturity model for implementation.

RESPONSIBLE PARTY: IT Consultant, Melissa Frederick – Administrative Coordinator

EXPECTED IMPLEMENTATION DATE: Second quarter of 2026.

Section V. Customer Service

V – Recommendation VII-1: Standardize and formalize documentation to include version controls on all standard operating procedures and use processes or tools to ensure documentation is kept up to date.

RESPONSE: Accepted

ACTION: CAN DO is reviewing customer service procedures and will adopt formal documentation.

RESPONSIBLE PARTY: Patricia Gendler - Chief Financial Officer

EXPECTED IMPLEMENTATION DATE: Fourth quarter of 2026.