



May 7, 2026

VIA E-File Only

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

**Re: Pennsylvania Public Utility Commission v. Pennsylvania-American Water Company
Docket No. R-2025-3057983 (Water)
Docket No. R-2025-3058051 (Wastewater)**

CAUSE-PA Pre-Served Testimony, Exhibits, Appendices, and Verification

Dear Secretary Homsher,

In accordance with 52 Pa. Code § 5.412a and the Prehearing Order in this matter dated December 17, 2025, please accept for filing the following preserved written testimony of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), along with the associated exhibits, appendices, and the executed Verification of CAUSE-PA's witness. The following documents were admitted into the record at the evidentiary hearings in this matter on March 23, 2026.

- **Direct Testimony of Harry S. Geller on Behalf of The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), CAUSE-PA Statement 1**
 - 65 pages of written testimony
 - Exhibit 1: Water/Wastewater Burden Tables
 - Exhibit 2: Self-Sufficiency Standard Income Comparisons by County
 - Appendix A: Resume – Harry S. Geller
 - Appendix B: Cited Discovery Responses

- **CAUSE-PA Errata to the Direct Testimony of Harry S. Geller**
- **Surrebuttal Testimony of Harry S. Geller on Behalf of The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), CAUSE-PA Statement 1-SR**
 - 26 pages of written testimony
 - Appendix A-SR: Cited discovery responses
- **Verification of Harry S. Geller**

A copy of this letter is being served on Administrative Law Judge Emily I. DeVoe and Administrative Law Judge Jeffrey A. Watson and the parties of record consistent with the attached Certificate of Service. Please contact us with any questions or concerns.

Respectfully submitted,

Respectfully Submitted,



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CC: *Certificate of Service*
The Honorable Emily I. DeVoe, edevoe@pa.gov (via email only)
The Honorable Jeffrey A. Watson, jeffwatson@pa.gov (via email only)

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:		
	:		
v.	:	Docket Nos.	R-2025-3057983
	:		R-2025-3058051
Pennsylvania-American Water Company	:		

Certificate of Service

I hereby certify that I have this day served copies of the **CAUSE-PA Pre-Served Testimony, Exhibits, Appendices, and Verification** upon the parties of record in the above captioned proceeding in accordance with the requirements of 52 Pa. Code § 1.54.

VIA Email Only

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Dated: May 7, 2026

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2025-3057983
	:	R-2025-3058051
Pennsylvania-American Water Company	:	

DIRECT TESTIMONY OF HARRY S. GELLER, ESQ.

ON BEHALF OF

THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)

January 30, 2026

Topics Addressed:

Rate Affordability / Rate Impact on Low Income Consumers

Low Income Programming

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PREPARED DIRECT TESTIMONY OF HARRY S. GELLER

1 **I. INTRODUCTION**

2 **Q: Please state your name, occupation, and business address.**

3 A: My name is Harry S. Geller. I am retired from my former position as the Executive
4 Director of the Pennsylvania Utility Law Project (PULP), but have maintained an office at 118
5 Locust St., Harrisburg, PA, 17101, for the purpose of providing consulting services and assistance
6 to low income individuals and the organizations which represent them in utility and energy matters.

7 **Q: Briefly outline your education and professional background.**

8 A: I received my B.A. degree from Harpur College, State University of New York at
9 Binghamton in 1966, and a J.D. degree from Washington College of Law, American University in
10 1969. Upon graduation from law school, I entered the Volunteers in Service to America (VISTA)
11 program, where I was assigned to the New York University Law School. I took courses in the Law
12 School's Urban Affairs and Poverty Law program and worked with the Community In Action
13 Program on the West Side of Manhattan in New York City from 1969-1971. In 1971, I started as
14 a Staff Attorney for the New York City Legal Aid Society, Criminal Court, and Supreme Court
15 Branches in New York County. In 1974, I moved to Pennsylvania and began working for Legal
16 Services, Incorporated (LSI). LSI was a civil legal aid program serving Adams, Cumberland,
17 Franklin, and Fulton Counties. I worked at LSI from 1974-1987 first as a Staff Attorney, then as
18 Managing Attorney, and ultimately became Executive Director. Through a restructuring with other
19 legal services programs, LSI became part of what is now known as MidPenn Legal Services and
20 Franklin County Legal Services.

21 In 1988, I was hired to be the Executive Director of PULP, a statewide legal aid project
22 dedicated to protecting the rights of low income utility customers. At PULP, I represented low

1 income individuals with utility and energy concerns and supported organizations advocating for
2 low income households in utility and energy matters. As the Executive Director, I consulted and
3 co-counseled on a wide variety of individual utility consumer cases, and I participated in task
4 forces, work groups and advisory panels, including serving as chair of the Department of Human
5 Services' LIHEAP Advisory Committee and the Pennsylvania Public Utility Commissions'
6 Consumer Advisory Committee. I frequently trained communities, legal aid staff, and advocacy
7 groups across Pennsylvania about the various utility and energy matters affecting Pennsylvania's
8 low income population. I retired from PULP on June 30, 2015. Since that time, I have continued
9 to provide consulting services for PULP and its clients, as well as other organizations serving the
10 low income community.

11 In sum, I have 50 years of experience working on behalf of households in poverty, including
12 the past 30 years focusing specifically on utility and energy issues affecting low income
13 consumers. My resume is attached as Appendix A.

14 **Q: Please describe the focus of your work over the past fifty years, including relevant**
15 **work experience on issues of low income families' ability to afford essential services such as**
16 **utilities?**

17 A: I have represented low income individuals and organizations serving low income
18 populations in a wide variety of legal matters, including family law, public benefits,
19 unemployment compensation, utility shut-offs, debtor/creditor, and housing-related disputes. Over
20 the past 30 years, my focus has been to ensure that low income households can connect to, afford,
21 and maintain utility and energy services.

22 In all of these legal matters, I worked almost exclusively on behalf of individuals and
23 households that subsist on incomes at or below 150% of the Federal Poverty Level (FPL). Through

1 this work, I have had a close view of the daily lives of countless of our poorest citizens. I have
2 spent hundreds, if not thousands, of hours assisting clients, combing through their budgets to see
3 whether it is even possible to make ends meet. Over the years, I have consistently seen the near
4 total absence of the ability of low income families to afford the most basic monthly necessities
5 with the incomes they have, even assuming heroic self-control and conscientious budgeting and
6 spending. Almost every month, my clients faced the stark reality of having to choose which bills
7 they can forgo with the least drastic consequences.

8 In addition to my deep understanding of the daily monetary struggles facing poor families,
9 I have an extensive knowledge of the array of programs designed to allow low income individuals
10 to afford utility service. While at PULP, I was involved in hundreds of proceedings evaluating the
11 effectiveness of programs that are intended to reduce low income households' utility burdens and
12 help them conserve energy and water through efficiency and weatherization— thereby reducing
13 utility costs and improving bill affordability. I have spent thousands of hours identifying the
14 problems in Universal Service programs and making recommendations for changes to these
15 programs to better serve low income consumers. This advocacy ultimately led to the recognition
16 of the need to develop integrated and coordinated programs for low income consumers.

17 Over my decades of service, I played an instrumental role in the development, oversight,
18 and monitoring of the initial pilot and then the statutorily required low income Universal Service
19 Programs, each of which is structured to provide a different form of complimentary assistance –
20 working in tandem to enable low income customers to afford and maintain basic service. For
21 example, the Customer Assistance Program (CAP) provides alternatives to traditional collection
22 methods for low income, payment troubled utility customers, allowing participants to receive a
23 more affordable bill and earn forgiveness on arrears in exchange for making in-full payments on

1 their discounted bill. In turn, the Low Income Usage Reduction Program (LIURP) is a targeted
2 weatherization program designed to assist low income households with the highest energy
3 consumption, payment problems, and arrearages to reduce their overall energy consumption. CAP
4 and LIURP work in tandem and are designed to assist low income households in maintaining
5 affordable utility services and safe living environments while reducing utility collection, thereby
6 benefitting other ratepayers and the communities in which they live and work.

7 **Q: Have you testified in any proceeding before the Pennsylvania PUC?**

8 A: Yes. I have presented testimony in many proceedings before the PUC. A complete list is
9 attached to my resume, which is attached as Appendix A.

10 **Q: For whom are you testifying in this proceeding?**

11 A: I am testifying on behalf of the Coalition for Affordable Utility Services and Energy
12 Efficiency in Pennsylvania (CAUSE-PA).

13 **Q: What is the purpose of your testimony?**

14 A: CAUSE-PA intervened in this proceeding to ensure that the rates proposed by
15 Pennsylvania American Water Company (PAWC or the Company), together with all attendant
16 policies, programs, and procedures governing the provision of water and wastewater services, will
17 not adversely affect the ability of PAWC's low income customers to connect to, maintain, and
18 afford water and wastewater services, which is a critical component to a safe and healthy home.
19 The bulk of my testimony will discuss the impact of PAWC's proposals on low income customers.

1 **II. PAWC’S PROPOSED RATE INCREASE**

2 **Q: Please summarize PAWC’s requested rate increase as it applies to residential**
3 **customers.**

4 A: With its proposed rate increase, Pennsylvania America Water (PAWC or the Company)
5 seeks to collect \$168.7 million more from consumers and businesses each year. This increase
6 would raise rates for residential consumers as follows:

- 7 • For a water customer in Zone 1 – PAWC’s largest zone – with a water bill based on average
8 usage of 3,263 gallons per month, the customer’s bill would increase from \$81.55 to
9 \$95.27. This is a 16.8% increase.
- 10 • For a wastewater customer in Zone 1, using the average usage of 3,164 gallons a month,
11 the customer’s bill would increase from \$109.50 to \$119.50. This is an increase of 9.1%.

12 If the Commission approves the full amount of this increase, a customer who has both their water
13 and wastewater service from PAWC will pay almost \$215 per month for their service assuming
14 they have average usage. This is a staggering and untenable amount for average income and
15 average usage customers and when one considers that many low income customers have
16 significantly higher usage than this, it is neither reasonable nor affordable.

17 **Q: What is the estimated economic impact of PAWC’s proposed rate increase on**
18 **residential water and wastewater customers in other rate zones?**

19 A: Table 1 (water) and Table 2 (wastewater) show the dollar and percentage impact at average
20 usage in different zones:

1 **Table 1: Residential Water Bill Impact by Rate Zone at 3,263K¹**

Rate Zone	Present Bill	Proposed Bill	\$ Change	% Change
Zone 1 – Most Residential	\$81.56	\$95.27	\$13.71	16.8%
Zone 2 – Valley	\$73.26	\$95.27	\$22.01	30%
Zone 3 – Turbotville	\$81.56	\$95.27	\$13.72	16.8%
Zone 4 – Farmington	\$67.50	\$95.27	\$27.77	41.1%
Zone 5 – East Dunkard	\$77.79	\$95.27	\$17.48	22.5%
Zone 6 – Audubon	\$44.92	\$58.35	\$13.43	29.9%
Zone 7 – Manwalamink	\$27.85	\$30.58	\$2.73	9.8%
Zone 8 – Appalachian	\$36.08	\$45.81	\$9.73	27%
Zone 9 - Corner	\$42.93	\$55.11	\$12.18	28.4%

2

3 **Table 2: Residential Wastewater Bill Impact by Rate Zone (3,164 gal/month)²**

Rate Zone	Present Bill	Proposed Bill	\$ Change	% Change
Zone 1 – Most Residential	\$109.50	\$119.50	\$10	9.1%
Zone 1a – Royersford	\$60.34	\$84.34	\$24	39.8%
Zone 1b – York	\$65	\$91.29	\$26.29	40.4%
Zone 1c – Foster Twp.	\$111.06	\$120	\$8.94	8%
Zone 1d – Butler	\$45.94	\$70.81	\$24.87	54.1%
Zone 1e – Sadsbury	\$128.33	\$128.33	-	-
Zone 1f – Farmington	\$53.50	\$74.88	\$21.38	40%
Zone 1g – Manwalamink	\$37.77	\$41.51	\$3.74	9.9%
Zone 2 – Kane & McKeesport	\$103.62	\$124.16	\$20.54	19.8%
Zone 2a – Scranton	\$103.62	\$103.62	-	-
Zone 2b – Elizabeth Borough	\$60.31	\$77.44	\$17.13	28.4%

4

5 **Q: Do you support the Company’s proposal to increase rates?**

6 A: No, I do not support the Company’s proposed increase to its rates. I recommend substantial
 7 revisions to and mitigation of PAWC’s proposals. I do not believe it is appropriate for a regulated

¹ See PAWC Exhibit 10-A at 78-86. Assumes 5/8” meter.

² PAWC Exhibit 10-B at 57-75; 10-C at 20; 10-E at 3. I note that I am using PAWC’s current rate zones for the sake of simplicity in illustrating the percent changes related to PAWC’s proposal. However, PAWC has proposed several rate zone designation changes pursuant to this proceeding, which is reflected in the proposed monthly rates

1 utility to raise rates for water and wastewater service when its existing rates are unaffordable.
2 PAWC provides basic services needed to live; the cost of these essential services should not be
3 increased without first ensuring that low income customers are able to access affordable service
4 under just and reasonable terms. This is always true and is especially relevant as Pennsylvania's
5 consumers have struggled profoundly in recent years as a result of steep inflation in the cost of
6 basic necessities.³

7 Over just the past year (from December 2024 to December 2025), consumer prices have
8 increased 2.7%, with essential categories rising even more steeply, including piped gas (up 10.8%),
9 fuel oil (up 7.4%), and electricity (up 6.7%).⁴ Food costs also rose, which compounds the
10 challenges created by recent changes to the SNAP program that have introduced eligibility barriers
11 and changed benefits.⁵ Even medical care has increased significantly, including a 6.7% rise in
12 hospital services, the largest since 2010.⁶ In this volatile economic environment, where Americans
13 are already paying more for unavoidable expenses such as heat, food, and healthcare, higher water
14 and wastewater rates would deepen the hardship on consumers who are already financially
15 strained.

16 As my testimony will demonstrate, multiple recent PAWC rate increases have resulted in
17 the inability of low income customers to afford existing rates. In fact, since 2020, PAWC has been
18 awarded more than \$300 million in rate increases and now seeks an additional \$169 million.⁷ Water

³ Bureau of Labor Statistics, U.S. Department of Labor, The Economics Daily, Consumer Price Index: 2025 in review at <https://www.bls.gov/opub/ted/2026/consumer-price-index-2025-in-review.htm> (visited January 26, 2026).

⁴ *Id.*

⁵ U.S. Department of Agriculture, Food & Nutrition Service, SNAP: One Big Beautiful Bill Act of 2025 Implementation (2025), <https://www.fns.usda.gov/snap/obbb-implementation>.

⁶ Bureau of Labor Statistics, U.S. Department of Labor, The Economics Daily, Consumer Price Index: 2025 in review at <https://www.bls.gov/opub/ted/2026/consumer-price-index-2025-in-review.htm> (visited January 26, 2026).

⁷ Pa. PUC v. PAWC, Opinion and Order, Docket Nos. R-2023-3043189, R-2023-3043190, et al. (Opinion and Order, July 22, 2024). Pa. PUC v. PAWC, Order on Reconsideration, Docket Nos. R-2023-3043189, R-2023-3043190, et al. (Order, September 26, 2024).

1 and wastewater services are not luxury goods, these services are vital to the health and safety of
2 consumers in PAWC’s service territory. It is an essential service. Without access to running water,
3 basic tasks of living – including brushing your teeth, cooking, cleaning, etc. – become impossible.
4 Lack of stable water/wastewater services to a home creates significant threats to customers, their
5 families, and their communities. It is imperative that rates – and attendant policies and procedures
6 – are designed to address disparities in water and wastewater economic burdens, and ensure low
7 income families are able to maintain essential services to their home.

8 Throughout my direct testimony, I provide recommendations for how PAWC can better
9 structure its services and assistance programs so that its low income customers can reasonably
10 afford to maintain water and wastewater services to their home. These recommendations are
11 designed to address rate unaffordability at *existing* rates and are vital to mitigate financial harm
12 for PAWC’s low income customers if the Commission allows PAWC to increase its rates.

13 **III. LOW INCOME CONSUMERS IN PAWC SERVICE TERRITORY**

14 **Q: How many low income customers reside in PAWC’s service territory?**

15 A: That is a difficult question to answer with specificity, especially in light of the last several
16 years during which the pandemic and related financial pressures – including rapid inflation in the
17 cost of basic goods and services – not only fell disproportionately on low income families and
18 other uniquely vulnerable households, but also negatively affected working families on the margin.
19 Nevertheless, there are several metrics to assess poverty levels in PAWC’s service territory and,
20 in turn, the likely impact of PAWC’s proposed rate increase.

1 Pennsylvania’s large public utilities track and classify their low income customer
2 populations in two ways – estimated low income customers and confirmed low income customers.⁸
3 Chapter 52 defines low income as a household with income at or below 150% of the federal
4 poverty level (FPL).⁹ However, PAWC defines “confirmed low income customer” to mean a
5 customer for which the Company has received income information indicating that the customer
6 has an annual income at or below 250% FPL, regardless of whether the customer is enrolled in
7 one of PAWC’s low-income programs.¹⁰ PAWC identifies confirmed low income customers in
8 several ways:

- 9 • By examining weekly reports of customers who are enrolled in the Company’s bill
10 discount program. When these customers are enrolled into the discount program, their
11 account is flagged by the Company as low-income.
- 12 • By the income information customers provided to the Company when determining
13 whether the customer qualifies for a payment arrangement from the Company,
- 14 • Through information provided to the Pennsylvania Public Utility Commission when an
15 informal complaint is filed with the Bureau of Consumer Services or when a payment
16 arrangement is requested through the Commission.¹¹

17 In total, as of November 2025 (the most recent data provided), PAWC indicates that it has
18 65,898 confirmed low income customers.¹²

19 When asked through discovery to identify its “estimated low income customer count,”
20 PAWC points to analysis of its expert witness, Deba F. Ather, estimating the number of customers
21 served by household income in PAWC’s service territory, as provided in Exhibits DFA-1 and
22 DFA-2.¹³ It appears that DFA-1 (water) calculates the number of customers under 200% FPL as
23 152,558 and DFA-2 (wastewater) calculates customers under 200% FPL as 31,841 – for a total of

⁸ See Pa. PUC, BCS, 2024 Report on Universal Service Programs & Collections Performance, at 2,7 (Issued January 2026).

⁹ 52 Pa. Code § 54.72.

¹⁰ PAWC Response to CAUSE-PA 01-005, attached hereto at Appendix B.

¹¹ PAWC Response to CAUSE-PA 01-006, attached hereto at Appendix B.

¹² PAWC Response to CAUSE-PA 01-004, Attachment, attached hereto at Appendix B.

¹³ PAWC Response to CAUSE-PA 01-007, attached hereto at Appendix B.

1 184,399 water and wastewater customers that PAWC considers low income **and** would be eligible
2 for PAWC’s Bill Discount Program (BDP),¹⁴ It is not clear how many of the 31,841 wastewater
3 customers are also PAWC water customers, but that fact is less material than the fact that there are
4 *at least* 152,558 PAWC customers who are eligible for PAWC’s discount program, assuming that
5 all wastewater customers are also water customers.¹⁵

6 Regardless of the measure, there are a substantial number of low income customers in
7 PAWC’s service territory who need to be considered in any decision regarding just, reasonable,
8 and affordable rates.

9 **Q: How much income must a household earn each month to be considered low income?**

10 A: The Commission considers a “low income” customer to be any customer whose income is
11 at or below 150% of the federal poverty level (FPL).¹⁶ PAWC uses a broader measure, noted
12 above, that is appropriate due to the eligibility guidelines of its low income programming. The
13 Company’s Help to Others (H2O) Bill Discount Program (BDP) is currently available to customers
14 with income at or below 200% FPL, while its H2O hardship grants are available to customers with
15 income at or below 250% FPL.¹⁷ The FPL is a measure of poverty based exclusively on the size
16 of the household, but not the household demographics (i.e., whether the household consists of
17 adults or children) or geographic location. The Table below provides a breakdown of the maximum
18 income threshold for various income tiers under the Federal Poverty Guidelines:

¹⁴ PAWC St. 9, Exhibits DFA-1, DFA-2.

¹⁵ While I use 152,558 as the estimated number of estimated low income households through-out my analysis, I note that this is likely an undercounting as there are some number of low income wastewater customers who are **not** also water customers, thus they would not be included in this analysis.

¹⁶ See 52 Pa. Code §§ 54.72, 62.2.

¹⁷ PAWC, “H2O Help to Others Program”, available at <https://www.amwater.com/paaw/customer-service-billing/Customer-Assistance-Programs/h2o-help-to-others-program>.

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Table 3: 2026 Annual Income by FPL and Household Size¹⁸

Household/ Family Size	50%	100%	150%	200%	250%
1	7,980	15,960	23,940	31,920	39,900
2	10,820	21,640	32,460	43,280	54,100
3	13,660	27,320	40,980	54,640	68,300
4	16,500	33,000	49,500	66,000	82,500
5	19,340	38,680	58,020	77,360	96,700

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As the above Table shows, a family of four with household income at or below 200% FPL has a *maximum* gross annual income of \$66,000 (\$5,500 per month) – while a family of four with income at or below 50% FPL has a maximum gross annual income of just \$16,500 (\$1,375 per month).¹⁹ For comparison, a full time (40 hour/week) Pennsylvania worker making \$10 per hour has a gross annual income of \$20,800, assuming they work every week of the year and have no time off. Even a Pennsylvania worker who earns a wage of \$25.30 an hour, which is approximately the median hourly wage in Pennsylvania,²⁰ would have income of only \$52,624, assuming they work 40 hours per week every week of the year. These income levels are much less than a household needs to meet their basic expenses in any of the counties in PAWC’s expansive service territory.²¹ The Self-Sufficiency Standard provides a more accurate picture of the income levels needed to meet basic needs without additional assistance.

¹⁸ US Dept. of Health & Human Services, [HHS Poverty Guidelines for 2026](https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines), available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>.

¹⁹ *Id.*

²⁰ See Keystone Research Center, State of Working Pennsylvania (2025), Table 1, page 15. Available at: https://keystoneresearch.org/wp-content/uploads/SWPA_2025KRC.pdf (Last visited: 1/13/2026).

²¹ 2024 Self-Sufficiency Standard at the Center for Women’s Welfare, University of Washington, available at <https://selfsufficiencystandard.org/pennsylvania/>.

1 **Q: Please explain how the Self Sufficiency Standard more appropriately measures**
2 **household need compared to household income.**

3 A: The Self Sufficiency Standard is a benchmark often used to assess how much income a
4 household needs to live without assistance in Pennsylvania. This tool measures the income that a
5 family must earn to meet their basic needs and consists of the combined cost of 6 basic needs –
6 housing, child care, food, health care, transportation, and taxes – without the help of public
7 subsidies.²² Unlike the federal poverty level, which does not change based on geographic location
8 or household demographics, the Self Sufficiency Standard accounts for the varied costs of these
9 six basic needs in different geographical areas and for differently aged household members.²³ As
10 shown in CAUSE-PA Exhibit 2, in 2024 (the most recent year of the datasets provided under the
11 Self-Sufficiency Standard), the Self Sufficiency Standard for a family of four in Pennsylvania --
12 consisting of 2 adults and 2 school age children – ranges across PAWC’s service territory from a
13 low of \$71,585 in Clarion County to a high of \$104,762 in Bucks County.²⁴

14 PAWC’s identified low income customers and H2O participants do not have income close
15 to either of these figures. The average annual household income for the Company’s currently
16 identified H2O participants is just \$21,351²⁵ while the average annual income of confirmed low
17 income customers is only \$11,387.²⁶ These households’ incomes are but a fraction of the level
18 needed to sustain their basic needs.

²² Id.

²³ Id.

²⁴ Id.

²⁵ PAWC Response to CAUSE-PA 01-024, attached hereto at Appendix B.

²⁶ PAWC Response to CAUSE-PA 01-025, attached hereto at Appendix B.

1 **IV. RATE DESIGN AND ALTERNATIVE RATE MECHANISM PROPOSALS**

2 **Q: Please briefly describe PAWC’s current rate design for water and wastewater**
3 **service for residential customers.**

4 A: As shown in the tables above, the Company currently offers water service in nine different
5 rate zones.²⁷ The largest of these rate zones is Rate Zone 1, with over 99% of the Company’s total
6 water revenue.²⁸ Rate Zone 1 offers service to residential and non-residential customer classes
7 through a monthly fixed charge that varies by meter size and a volumetric charge that varies by
8 customer class and rate zone.²⁹ Because the vast majority of customers take service in Rate Zone
9 1, this will be the focus of my testimony.³⁰ The same is true for wastewater. PAWC provides
10 service under a variety of different rate schedules and for a variety of different rate zones –
11 including eight different Sanitary Sewer System rate zones and two different combined sewer
12 system rate zones.³¹ While PAWC operates Rate Zone 1 as a statewide rate zone for wastewater,
13 multiple wastewater rate zones continue to have separate rate schedules.³²

14 As it has done in the past, PAWC is also proposing to reallocate a portion of its wastewater
15 revenue requirements to its water service customers, citing Act 11 of 2012 to support this cross-
16 service subsidization proposal.³³ Specifically, as shown in the table below, of the total revenue

²⁷ PAWC St. 10 at 8-9.

²⁸ Id.

²⁹ PAWC St. 10 at 9.

³⁰ See PAWC St. 10 at 11-14. In this proceeding, the Company is proposing to move Rate Zone 2 (Valley), Rate Zone 3 (Turbotville), Rate Zone 4 (Farmington), and Rate Zone 5 (East Dunkard) rates to Rate Zone 1 rates. The Company is also proposing to move Rate Zone 6 (Audubon), Rate Zone 7 (Manwalamink), Rate Zone 8 (Appalachian), and Rate Zone 9 (Corner Water) toward Rate Zone 1 rates and rate structures.

³¹ PAWC St. 10 at 17.

³² See PAWC St. 10 at 37-38. The Company is proposing, in addition to Rate Zone 1, Wastewater Rate Zone 1a (Royersford), Rate Zone 1b (York), Rate Zone 1c (Foster), Rate Zone 1d (BASA) Rate Zone 1e (Sadsbury), Rate Zone 1f (Farmington), Rate Zone 1g (Manwalamink), and Rate Zone 9 (Royersford). The Company is proposing in this case to move Rate Zone 1c (Foster) to Rate Zone 1 rates. The Company is also proposing in this case to move Rate Zone 1a (Royersford), Rate Zone 1b (York), Rate Zone 1f (Farmington), and Rate Zone 1g (Manwalamink) rates toward Rate Zone 1 rates and rate structures. Id. at 22.

³³ PAWC St. 10 at 21.

1 requirement increase requested in this case – \$168.7 million – PAWC allocates \$99.4 million to
 2 water operations and \$69.3 million to wastewater operations *before* application of the Act 11
 3 shift.³⁴ PAWC proposes to allocate \$53 million of wastewater revenue requirement to water
 4 customers, thus, *after* application of the Act. 11 shift PAWC proposes an increase for water
 5 customers of \$152.4 million and for wastewater customers of \$16.3 million.³⁵

6 **Table 4: Effect of Act 11 Shift on Revenue Requirement³⁶**

	Total Revenue Increase Requested - \$168.7 million		
	Before Act 11 Shift	Act 11 shift	After Act 11 shift
Water	\$99.4m	+\$53m	\$152.4m
Wastewater	\$69.3m	-\$53m	\$16.3m

7 While I will not take a position at this time related to the proposed Act 11 modifications,
 8 counsel for CAUSE-PA reserves the right to address these issues in briefing concerning whether
 9 a shift of this magnitude meets the equity considerations inherent in 66 Pa. C.S. 1311(c). It is worth
 10 noting, however, that most PAWC water customers are served by a different wastewater provider
 11 and, thus, by shifting *PAWC’s wastewater customers’* revenue requirement to its water customers,
 12 the Company is choosing to place an additional burden on its water customers that is based on
 13 policy and not cost of service. Thus, while I am not taking a position at this time about whether
 14 the magnitude of Act 11 shift is reasonable, I reserve the right to respond to other parties’ positions
 15 related to PAWC’s Act 11 proposal, and to provide further analyses related to whether this
 16 proposal or any proposed modifications thereto are reasonable and in the public interest.

³⁴ PAWC Initial Filing, Volume III, Exhibit 3-A, Revenue Deficiency and Adjustments, Revenue Requirement – Summary at A.

³⁵ *Id.*; PAWC St. 10 at 31: 3-7.

³⁶ *Id.*

1 **A. Fixed Customer Charge**

2 **Q: Please describe the Company’s service charge.**

3 A: The Company charges a fixed service charge to all active customers on metered service
4 regardless of usage. The current fixed service charge for residential water customers in Zone 1 is
5 \$18.80³⁷ and the current fixed service charge for residential wastewater customers in Zone 1 is
6 \$15.³⁸

7 **Q: Is the Company proposing any changes to its service charge?**

8 A: Yes, the Company is proposing to increase its fixed service charge for residential water
9 customers in Zone 1 to \$20,³⁹ or by 6%, and increase its fixed charge for residential wastewater
10 customers in Zone 1 to \$20,⁴⁰ or by 25%.

11 **Q: Do you have any concerns about these increases in the Company’s service charges?**

12 A: Yes. Any increase in fixed charges, not tied to usage, undermines a household’s ability to
13 reduce their bills by reducing their usage. As discussed in detail below, PAWC does not offer a
14 comprehensive leak repair program, but does offer conservation kits and other tools intended to
15 help low income households manage their usage.⁴¹ Any increase in fixed charges will erode
16 achievable bill savings through these offerings as well as through other means by which a customer
17 seeks to conserve water – such as shorter showers, low flow appliances, and limited outdoor
18 watering.

³⁷ Supplement No. 50 to Tariff Water – PA P.U.C. No 5 Fifth Revised Page 16; assuming 5/8” meter.

³⁸ Supplement No. 52 to Tariff Wastewater – PA P.U.C. No. 16 Ninth Revised Page 11.1; assuming 5/8” meter.

³⁹ Supplement No. 58 to Tariff Water – PA P.U.C. No. 5 Eighth Revised Page 16.1; assuming 5/8” meter.

⁴⁰ Supplement No. 61 to Tariff Wastewater PA P.U.C. No. 16 Tenth Revised Page 11.1; assuming 5/8” meter.

⁴¹ PAWC St. No.2 at 13: 20-22.

1 Given that low income households are disproportionately at risk of termination as a result of
2 unaffordable rates, it is critical that they retain the ability to reduce their bills by conserving
3 wherever possible.

4 **Q: What is your recommendation regarding the proposed increases to the fixed charges?**

5 A: I am opposed to any increase in the fixed charges for water and wastewater.

6 **B. Deduct Adjustment/Winter Averaging Proposal**

7 **Q: Please summarize the Company’s proposed deduct adjustment rate design for**
8 **wastewater service?**

9 A: Wastewater service is not metered. This means that to bill for the volume of wastewater
10 used by a customer, wastewater providers rely on meter reading from water usage as a proxy for
11 measuring and billing wastewater service. Because not all water used will flow through the
12 wastewater system, the Company is proposing to change the way that it determines the volumetric
13 component of bills for residential customers from the method used currently. Under PAWC’s
14 current design, volumetric wastewater charges are based on total metered water usage for the
15 month without reduction for any usage that does not go through the wastewater system such as
16 watering yards and plants, filling swimming pools, or washing vehicles. PAWC has proposed to
17 change that approach in this case through what it refers to as a deduct adjustment (formerly
18 proposed as “winter averaging”).⁴²

19 Under PAWC’s proposed deduct adjustment method, a customer’s wastewater bill in the
20 months of January, February, and March (the winter months) would be determined by *actual*
21 metered water usage for the month.⁴³ In all other months, a customer’s wastewater bill would be
22 based on the lesser of actual metered water usage for the month or the average water consumption

⁴² PAWC St. 10 at 25: 3-6.

⁴³ *Id.* at 26: 11-13.

1 for that customer in the winter months.⁴⁴ For new customers or those without winter billing history,
2 PAWC proposes to bill based on actual consumption until sufficient average billing data is
3 available.⁴⁵ PAWC further proposes that in cases where the customer has low usage which is non-
4 representative of actual consumption included in the deduct adjustment calculation, it will use
5 1,000 gallons in place of the month's actual consumption.⁴⁶

6 PAWC, through its witness, acknowledges that the effect of this proposal is to increase the
7 volumetric rate more than it otherwise would need to for the same revenue requirement request.⁴⁷
8 This is because the revenue requirement would have to be collected over a smaller number of
9 gallons billed.

10 **Q: Do you have any concerns about the deduct adjustment rate design proposal?**

11 A: Yes. While I understand the motivation, I am concerned that PAWC's proposed deduct
12 adjustment improperly favors customers residing in single family homes with higher incomes. As
13 proposed, the winter averaging methodology will benefit residential customers who use significant
14 amounts of water in non-winter months over and above their winter average. During non-winter
15 months, outdoor water usage for activities such as landscape irrigation and swimming pools makes
16 up a sizable share of residential water use.⁴⁸ Similarly, higher income families who have the
17 sufficient funds to practice outdoor discretionary water usage during non-winter months will use
18 more water compared to lower income families, and those who live in apartments or smaller
19 properties.⁴⁹ As proposed, I am concerned that the winter averaging methodology improperly shifts

⁴⁴ *Id.* at 25: 11-15.

⁴⁵ *Id.* at 27: 3-5.

⁴⁶ *Id.* at 27: 9-11

⁴⁷ *Id.* at 28: 3-5.

⁴⁸ NRDC, *Water Affordability Advocacy Toolkit - Equitable Water Rates*, at p. 97, available at, <https://www.nrdc.org/sites/default/files/water-affordability-toolkit-section-9.pdf>.

⁴⁹ *Id.*

1 the revenue burden from higher income customers who reside in single-family homes to customers
2 with lower income, and those that live in apartments or smaller properties.

3 Further, in conjunction with the Company's Act 11 proposals to shift a significant
4 proportion of wastewater costs to water customers, this additional shifting of wastewater costs
5 from higher income households to lower income households is particularly concerning. The
6 cumulative effect of both Act 11 shifting and this proposed deduct adjustment is to significantly
7 reduce the revenues collected from higher income wastewater customers at the expense of all other
8 residential customers, the effects of which will be felt most significantly by low income water
9 customers.

10 **Q: What is your recommendation?**

11 A: The Commission should reject PAWC's proposal. As discussed, PAWC's proposed deduct
12 adjustment methodology improperly shifts the revenue burden from customers who reside in
13 single-family homes and have the luxury of discretionary water use to customers with lower
14 income, and those that live in smaller homes or apartments. The effect of this proposal is to raise
15 the per gallon cost for all customers, which is inequitable, unjust, and unreasonable for those lower
16 income customers who cannot afford to engage in higher discretionary water use in non-winter
17 months, and customers residing in smaller homes. These customers should not be penalized for
18 lower water use in non-winter months compared to their higher income counterparts.

19 **C. CAP Rider**

20 **Q: Please summarize the Company's CAP Rider Proposal**

21 A: Currently, PAWC collects the costs of its Bill Discount Program (BDP), its Arrearage
22 Management Program (AMP), and the attendant administrative costs, referred to here as CAP

1 costs, in rates and directly assigns those costs to all residential ratepayers.⁵⁰ PAWC proposes to
2 continue to recover the bulk of these costs through rates, but collect or refund the difference
3 between PAWC's CAP costs included in base rates and PAWC's actual CAP costs through its
4 CAP rider.⁵¹ The Company proposes to include in its rider the costs related to its BDP discounts,
5 AMP credits, as well as its newly proposed Renter Assistance Pilot Program (RAPP) stipends, and
6 RAPP administrative costs.⁵² The Company proposes to collect these costs solely from residential
7 customers under this new rate design.⁵³

8 **Q: Do you have any concerns about the proposed CAP Rider?**

9 A: Yes. I think it is premature to collect these costs through a rider rather than to continue to
10 collect them through rates. Nothing is compelling PAWC to make this switch at this time other
11 than it seeks to guarantee revenue recovery through a rider rather than rates. Gas and electric
12 universal service programs, mandated a quarter of a century ago and matured under Commission
13 oversight since then, are collected through a rider because the Public Utility Code specifically
14 requires this method of collection.⁵⁴ However, PAWC's low income programs remain nascent and
15 in development. In my view, it is appropriate to continue to collect the costs of these programs
16 through base rates - without implementation of a separate rider. PAWC has evidenced a rapid
17 cadence of rate cases that creates more than sufficient opportunities to update its costs and
18 expenses to fund these programs.

19 Additionally, I disagree with PAWC's decision to continue collecting the costs of these
20 programs only from residential ratepayers. It is unreasonable for residential customers, many of

⁵⁰ See PAWC St. 2 at 31.

⁵¹ *Id.* at 31: 15-16.

⁵² *Id.* at 31: 15-17.

⁵³ *Id.* at 34: 14-20.

⁵⁴ See 66 Pa. C.S. §§ 2203(6) and 2802(17).

1 whom are struggling themselves but have neither been selected or qualified for assistance, to solely
2 bear the burden of these costs. The General Assembly has recognized that universal service
3 programs are public purpose costs in the context of both gas and electric service because they assist
4 economically vulnerable Pennsylvania families maintain access to essential utility service. By
5 extension, I believe those same principles are at play for water and wastewater service. They are
6 no less essential services than other utility costs. The fact that assistance programs for water and
7 wastewater are not as well developed is a consequence of their relative nascence, not an indication
8 that they are less important. As such, I do not believe it is reasonable for only residential customers
9 to bear these costs. The “cause” of the need for these programs is poverty – a societal problem.
10 Addressing the methods to retain basic and essential service is a community wide problem - not
11 created by residential customers, who, as workers and consumers, are subject to the level of the
12 wages, costs of goods, essential services, and utility rates controlled by other aspects of society.

13 This fact was recognized by the Commission in its Final CAP Policy Statement and Order,
14 where the Commission addressed the recovery of universal service program costs. While the
15 Commission did not require jurisdictional utilities to propose specific allocations, the Commission
16 indicated that it is appropriate to consider recovery of the costs of customer assistance programs
17 from all ratepayer classes because “poverty, poor housing stock, and other factors that contribute
18 to households struggling to afford utility service are not just ‘residential class’ problems.”⁵⁵ The
19 Commission explained that the provision of universal services to help low income families
20 maintain service to their homes is “a benefit to the economic climate of a community.”⁵⁶ The
21 Commission directed utilities and stakeholders to address CAP cost recovery in utility-specific

⁵⁵ Final CAP Policy Statement and Order, Docket No. M-2019-3012599, at 97 (Order entered Nov. 5, 2019); see also 52 Pa. Code §§ 69.265(1), 69.266(b).

⁵⁶ Final CAP Policy Statement and Order at 7, 94-96, 107.

1 rate proceedings, indicating that “*the Commission will no longer routinely exempt non-residential*
2 *classes from universal service obligations.*”⁵⁷ Recognizing, as I did above, that the CAP Policy
3 Statement is not currently directed to water and wastewater utilities, the principles that apply are
4 the same. Maintaining water and wastewater service to a low income family’s home is just as
5 important to the economic climate of a community than maintaining electric and gas service to
6 that same home. Thus, I propose that the costs of these programs be allocated as indirect expenses
7 and allocated broadly across all rate classes consistent with other costs incurred by PAWC.

8 **V. ANALYSIS OF RATE AFFORDABILITY, LOW INCOME HOUSEHOLDS**

9 **Q: How is water and wastewater affordability measured?**

10 A: There are multiple methods used to measure the affordability of water and wastewater
11 service, some that attempt to assess affordability across the utility service territory at a high level,
12 and others that attempt to assess affordability at the household level, providing context about the
13 economic tradeoffs between basic water service and other household essentials.⁵⁸ According to the
14 EPA’s recent report to Congress on water affordability, “[o]ne widely used qualitative definition
15 of water affordability is the ability of a household to pay for basic water services necessary for
16 drinking, cooking, cleaning, and sanitation without experiencing undue hardship.”⁵⁹ In its report,
17 the EPA explains that the definition of the term “undue hardship” should be understood to describe
18 water affordability as ‘essential water and sanitation services available at a price that does not
19 prevent access, nor interfere with other essential expenditures such as food, healthcare, housing,
20 clothing, and education.’⁶⁰

⁵⁷ *Id.* at 97 (emphasis added); see also 66 Pa. C.S. § 69.266(b).

⁵⁸ EPA Water Affordability Needs Assessment: Report to Congress (December 2024). Available at: <https://www.epa.gov/system/files/documents/2024-12/water-affordability-needs-assessment.pdf> (Last visited: 01/30/2026) (“2024 EPA Report”).

⁵⁹ 2024 EPA Report at 14.

⁶⁰ *Id.* (Internal Citations Omitted).

1 One methodology discussed in the EPA report combined multiple metrics to develop a
2 more comprehensive picture of affordability challenges including both the Affordability Ratio
3 (AR), which calculates the ratio of the basic price of water services to the household’s disposable
4 income and the Hours of Labor at Minimum Wage (HM) which represents the number of hours a
5 customers would need to work at minimum wage to earn the amount necessary to pay for basic
6 water and wastewater services.⁶¹ While I am not advocating for any particular method in this
7 testimony, it is essential to acknowledge that undue burden and inability to afford basic water and
8 wastewater services within PAWC’s service territory exist and there is not one sole metric that can
9 adequately show the struggle of low income households attempting to afford basic service.

10 A common metric that I have applied most frequently to determine the affordability of
11 utility service is referred to as the household’s utility bill burden – meaning the percentage of gross
12 household income required to cover the cost of the bill.⁶² In the context of water and wastewater
13 affordability, the household utility bill burden is referred to as the household water and wastewater
14 burden. While Pennsylvania has not adopted statewide water and wastewater burden standards, it
15 had been generally accepted that the combined cost for water and wastewater service should not
16 exceed 4% of household income.⁶³ While useful for purposes of this analysis, 4% should be viewed
17 as the upper limit as we are moving to make bills more affordable. It does not mean that bills are
18 definitively affordable as they approach this limit, especially for low income households.

⁶¹ *Id.* at 18; (Internal Citations Omitted).

⁶² Roger Colton, The Affordability of Water and Wastewater Service in Twelve U.S. Cities: A Social, Business and Environmental Concern, The Guardian, (May 2020), available at: <https://www.theguardian.com/environment/2020/jun/23/full-report-read-in-depth-water-poverty-investigation>.

⁶³ NRDC, Water Affordability Toolkit: Affordability and Assistance Programs, at 73, available at: <https://www.nrdc.org/sites/default/files/water-affordability-toolkit-section-8.pdf>; Roger Colton, The Affordability of Water and Wastewater Service in Twelve US Cities, The Guardian (May 2020), available at: <https://www.theguardian.com/environment/2020/jun/23/full-report-read-in-depth-water-poverty-investigation>; NAACP Legal Defense and Educational Fund, Inc., Water/Color: A Study of Race & The Water Affordability Crisis in America’s Cities (2019), available at: https://www.naacpldf.org/wp-content/uploads/Water_Report_FULL_5_31_19_FINAL_OPT.pdf.

1 However, for purpose of designing a program to assist households, I view this as an acceptable
2 benchmark.

3 While I will discuss recommended improvements to its low income programing later in my
4 testimony, it is important to recognize that that the mere existence of assistance programs does
5 not, on its own, fulfill the duty of ensuring that rates are affordable. The number of households in
6 need of assistance and the amount of assistance needed per household is far greater than what is
7 presently reflected in the uptake and structure of PAWC's current programming. Thus, when
8 analyzing burdens on households, the Commission must consider the burden on households
9 enrolled in PAWC's low income programs **and** the burden on low income customers who are not
10 enrolled.

11 **Q: What are the current water and wastewater burdens for PAWC's low income**
12 **customers?**

13 A: At current rates, PAWC's lowest income customers are subject to excessive and
14 unaffordable water and wastewater burdens. CAUSE-PA Exhibit 1, attached to my testimony,
15 provides a snapshot of the applicable water and wastewater burdens for low income customers,
16 both at present and proposed rates in Water Rate Zone 1 and Wastewater Rate Zone 1. CAUSE-
17 PA Exhibit 1 breaks down the relative water and wastewater burden for households at different
18 income and usage levels. For example, at current rates in Rate Zone 1, a four-person household at
19 50% FPL using 6,000 gallons of water each month (a typical usage of 50 gallons per person per
20 day),⁶⁴ has a combined water and wastewater burden of nearly 24%. If PAWC's rate increase

⁶⁴ 2024 EPA Report at Appendix D: Water Hygienic Use Values used in National Affordability Studies; the majority of studies cited use 50 gallons per day, assuming a household of 4, resulting in 6,200 gallon usage per household per month.

1 proposal is approved, this same household will face a combined water and wastewater burden of
2 almost 27%.

3 As discussed more fully below, these excessive water/wastewater burdens pose significant
4 obstacles for low income families to affording their monthly bills and staying connected to
5 essential and life-sustaining water and wastewater services in their homes – creating a cascade of
6 consequences to the health, safety, and stability of Pennsylvania’s economically vulnerable
7 families and their communities.

8 **Q: In addition to high water and wastewater burdens, is there other evidence that**
9 **PAWC’s low income customers already struggle to afford water and wastewater services at**
10 **existing rates – even before any rate increase is approved?**

11 A: Yes. In addition to facing demonstrably unaffordable water and wastewater burdens,
12 PAWC’s low income customers also carry a disproportionate amount of residential customer debt
13 and are far more likely than general residential customers to have their service involuntarily
14 terminated for nonpayment. These indicators demonstrate that PAWC’s low income customers
15 already struggle to afford water/wastewater services under existing rates. If PAWC’s proposed
16 rate increase is approved, low income consumers will likely experience even greater rates of
17 payment trouble and involuntary termination, ultimately increasing the risk of consequences to the
18 health and safety of low income customers and their neighbors as well as the corresponding level
19 of uncollectible expenses recovered from other ratepayers.

20 First, despite making up just 9.9% of PAWC’s residential customer base, confirmed low
21 income customers carry over 40% of residential arrears.⁶⁵ Further, as shown in Table 5, PAWC’s

⁶⁵ PAWC Response to CAUSE-PA 01-002, Attachment; 01-004, Attachment; and 01-035, Attachment, attached hereto at Appendix B.

1 confirmed low income customers have markedly higher rates of termination for nonpayment
 2 compared to residential customers as a whole:

3 **Table 5: Involuntary Terminations for Nonpayment (Confirmed Low Income (CLI) v.**
 4 **Residential Customers) (2023-2025)⁶⁶**

	Res.	Res. Term.	Res. Term. Rate	CLI	CLI Term.	CLI Term. Rate.
2023	653,016	15,638	2.39%	69,495	8,822	14.12%
2024	655,959	13,111	2.00%	71,352	7,277	10.21%
2025⁶⁷	667,678	17,177	2.57%	65,898	9,922	15.06%

5 In 2025, the termination rate of confirmed low income customers was nearly *six times higher* than
 6 the termination rate for residential customers as a whole. This disparity in termination rates for
 7 low income customers underscores the vital need to address rate affordability to ensure all
 8 Pennsylvanians can afford to maintain running water in their homes.

9 PAWC’s confirmed low income customers also carry substantially higher level of arrears
 10 compared to residential customers as a whole:

11 **Table 6: Average Arrearage: Residential, Confirmed Low Income, BDP (2023-2025)⁶⁸**

	All Res.	CLI	BDP
Dec. 2023	\$237.00	\$455.78	\$390.64
Dec. 2024	\$274.97	\$491.50	\$371.18
Nov. 2025	\$224.90	\$341.19	\$224.67

⁶⁶ PAWC Response to CAUSE-PA 01-002, Attachment; 01-004, Attachment; 01-028, Attachment; 01-030, Attachment and 01-003, attached hereto at Appendix B.

⁶⁷ 2025 numbers are as of November 2025.

⁶⁸ PAWC Response to CAUSE-PA 01-034, Attachment, attached hereto at Appendix B.

1 In November 2025 (the last reported month), confirmed low income customers carried an
2 average arrearage level of \$341.19. By comparison, residential customers as a whole (inclusive of
3 low income customers) carried an average arrearage level of \$224.90, excluding low income
4 customers brings that arrearage level down further to \$171.83.⁶⁹ These disproportionate arrearage
5 levels further underscore the existing hardship that PAWC’s confirmed low income customers face
6 to afford basic water/wastewater services – even before any rate increase is approved.

7 **Q: Above, you explained that PAWC’s low income customers face unaffordable water**
8 **and wastewater burdens at existing rates. What would the applicable water and wastewater**
9 **burdens be for low income customers at PAWC’s proposed rates?**

10 A: PAWC’s proposed rate increases would exacerbate existing levels of unaffordability for
11 PAWC’s low income customers. The impact of the proposed increase on low income water and
12 wastewater rates varies not only between rate zone and across income levels, but also according
13 to customer usage. In addition to showing residential water and wastewater burdens at existing
14 rates, CAUSE-PA Exhibit 1 also provides a snapshot of residential water and wastewater burdens
15 at proposed rates for Rate Zone 1 Water and Rate Zone 1 Wastewater – broken down by income
16 tier and at various usage levels, ranging from 1,000 to 8,000 gallons. As shown by CAUSE-PA
17 Exhibit 1, low income customers will face exorbitant combined water/wastewater burdens at
18 proposed rates.

19 The varied rate impacts by usage levels detailed in CAUSE-PA Exhibit 1 are particularly
20 important in the context of examining rate impact for low income households, as evidenced by the
21 disparity in average usage levels, discussed below.⁷⁰ Overall, the detailed water and wastewater

⁶⁹ Id.

⁷⁰ See US Dep’t of Health, Office of Disease Prevention & Health Promotion, Social Determinants of Health: Quality of Housing (2020), available at: <https://health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/quality-housing>.

1 burden charts in CAUSE-PA Exhibit 1 reveal the significant water/wastewater burdens that many
2 low income customers will bear at proposed rates.

3 **Q: How would PAWC’s proposed rate increase impact vulnerable households?**

4 A: As I noted above, the substantial rate increase proposed by PAWC is likely to cause
5 increased terminations of economically vulnerable consumers or, in the alternative, to cause
6 economically vulnerable households to go without other critical life necessities such as energy,
7 heat, food, medicine, childcare, and other essential services to afford water and wastewater
8 services to their home.

9 Water terminations pose a serious threat to public health and human dignity. Without
10 access to running water, families are unable to cook, bathe, clean, or flush the toilet.⁷¹ Access to
11 water service is tied directly to the health and well-being of the household, and the habitability of
12 the home.⁷² Water terminations are akin to eviction from a home, as the home may be deemed
13 uninhabitable or even condemned following termination of water service, forcing families to
14 vacate with little to no notice.⁷³ Termination of water service to the home can also jeopardize a
15 parent’s custody of their children, can result in the loss of housing assistance, and is often cited as
16 a catalyst for homelessness.⁷⁴ As shown above, unaffordable water bills can lead to disconnections,
17 which can force households to rely on unsafe water sources or to forgo essential hygiene
18 practices.⁷⁵ The impacts of unaffordable water fall disproportionately on a subset of the population
19 in communities.⁷⁶ Older populations on fixed incomes may struggle disproportionately with rising

⁷¹ Water/Color Report at 28.

⁷² Id.

⁷³ Id.

⁷⁴ Water Affordability Advocacy Toolkit - Equitable Water Rates, at 22.

⁷⁵ 2024 EPA Report at 9.

⁷⁶ Id.

1 rates⁷⁷ and children may experience school absenteeism and increased interpersonal conflict.⁷⁸
2 High water bills can also increase the likelihood that these households may resort to expensive
3 payday loans to pay for basic living expenses.⁷⁹

4 Even at PAWC’s current rates, many families already must make difficult choices between
5 paying for utility services and other basic necessities – raising rates for such consumers will make
6 their ability to afford and/or obtain and retain such necessities more difficult.

7 **Q: Are low income customers enrolled in PAWC’s Bill Discount Program (BDP)**
8 **protected from the financial impact of the proposed rate increase?**

9 A: No. PAWC’s BDP will reduce but not eliminate the financial impact of PAWC’s proposed
10 rate increases for BDP participants. Unlike a Percentage of Income Program, which ties rates
11 directly to each participant’s household income, PAWC’s BDP is designed as a tiered rate discount
12 program which provides an aggregated group of participants a percentage discount on rates. When
13 rates increase, without a corresponding increase in the BDP discount, the resulting BDP charges
14 necessarily increase. In this case, PAWC has proposed to *reduce* its current discount levels, which
15 would *increase* rates for customers participating in PAWC’s BDP.⁸⁰ The effectiveness of PAWC’s
16 BDP and both current and proposed rates is dependent on approval of robust enhancements to the
17 structure and discounts provided under the BDP, and the ability of customers to enroll.

18 As it stands, PAWC’s BDP enrollment remains very low – reaching just 13% of PAWC’s
19 estimated low income customers and 30% of PAWC’s confirmed low income customers (those

⁷⁷ Id.

⁷⁸ Low Income Household Water Assistance Program – Implementation and Impact Final Report. U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services (Internal Citations omitted)., <https://acf.gov/sites/default/files/documents/ocs/LIHWAP-Final-Impact-and-Implementation-Report.pdf> (Issued January 2025).

⁷⁹ Income Volatility in the Service Sector at p. 9 (almost a quarter of consumers reporting week-to-week volatility report using payday lenders).

⁸⁰ PAWC Statement No. 2 at 14: 20; CAUSE-PA Exhibit 1-c.

1 *already known* by the Company to be income eligible for the BDP) as of November 2025.⁸¹ Low
2 income customers that are not enrolled in the BDP will shoulder the full, unmitigated financial
3 burden of the rate increase – compounding existing high levels of rate unaffordability.

4 **Q: What is your overarching conclusion about the impact of PAWC’s proposed rate**
5 **increase on low income water and wastewater customers?**

6 A: PAWC’s current rates are already unaffordable for its low income customers, especially
7 for those at the lowest end of the poverty scale (at or below 50% FPL) and those with higher usage
8 and/or larger family sizes. Continuing to increase rates at the rapid pace proposed by PAWC will
9 push necessary water and wastewater service further out of reach of customers who currently
10 cannot afford service and those who are just getting by.

11 **VI. PAWC AFFORDABILITY ANALYSES**

12 **Q: Has PAWC conducted any analysis of the affordability of its rates for residential**
13 **customers?**

14 A: Yes. In his direct testimony, PAWC witness Deba F. Ather explained that the Company
15 conducted two types of affordability analyses for its water and wastewater services.⁸² First, an
16 Enterprise-Level analysis, which purports to assess the affordability of PAWC’s service at a high
17 level over a multi-year period.⁸³ The metric used in this analysis was called a Bill-to-Income (BTI)
18 Ratio – defined as annual water bills divided by estimated annual income.⁸⁴ This analysis looked
19 at average residential monthly bills for all customers over time, compared to the median household
20 income (MHI) for residential customers.⁸⁵ In his direct testimony, Mr. Ather described the results

⁸¹ PAWC Response to CAUSE-PA 01-004, Attachment, and 01-014, Attachment, attached hereto at Appendix B;
PAWC St. 9 Exhibits DFA-1, DFA-2.

⁸² PAWC St. 9 at 3-4.

⁸³ Id.

⁸⁴ Id. at 5.

⁸⁵ Id. at 7: 6-10.

1 of PAWC’s Enterprise-Level Analysis. According to Mr. Ather, the data shows that the BTI Ratios
2 for water service for PAWC customers have remained steady since 2014 and increased very
3 slightly from 0.93% in 2023 to 0.94% in 2024.⁸⁶ The BTI Ratio at the median income level is
4 expected to be 1.04% under the Company’s proposed rates in this case.⁸⁷

5 Second, PAWC’s Community-Level analysis is an attempt to assess the affordability of
6 service at proposed rates in this case for individual groups of customers, using information on
7 household income, size, and home ownership data from the U.S. Census Bureau at varying usage
8 levels.⁸⁸

9 PAWC’s Community-Level analysis considered a number of factors impacting the ability
10 of a household to access “basic water service” at current and proposed rates.⁸⁹ Basic water service,
11 as used in this analysis, is “a water usage level that reflects the level of water consumption for
12 basic human services” – which PAWC sets at 40 gallons per household member per day.⁹⁰ As
13 discussed further below, these usage levels are insufficient when compared to actual usage,
14 especially among PAWC’s low income customers.

15 According to Mr. Ather, applying this analysis, there are approximately 84,300 residential
16 water customers and 21,000 wastewater customers that will see bills for Basic Water Service
17 (BWS) above 2% of their household income, which is approximately 14% and 20% of the total
18 customer population for water and wastewater service, respectively.⁹¹ Mr. Ather appears to be
19 relying on Charts 5 and 6 in his testimony to come to this conclusion. Notably, these charts

⁸⁶ Id. at 9: 16-18.

⁸⁷ Id. at 9: 18-19.

⁸⁸ Id. at 14: 17-22.

⁸⁹ Id. at 16: 8-21.

⁹⁰ Id. at 17: 11-12.

⁹¹ Id. at 21: 6-10.

1 presume full BDP participation⁹² as opposed to the 13% of estimated low income customers that
2 are actually enrolled in the BDP. This presumption likely results in a significant under-counting
3 of PAWC customers who will fall above the Company's 2% BTI threshold. In other words, based
4 on PAWC's own analysis, which improperly presumes full BDP enrollment, roughly one-third of
5 its residential customers will receive rates that exceed widely accepted water and wastewater
6 affordability standards.

7 In reviewing the analysis provided by Mr. Ather in DFA-1 and DFA-2, which includes
8 household income **and** varying usage levels, it is not until a household income reaches more than
9 \$50,000 that the household begins to reach affordability, and even then, only at the lowest usage
10 levels, up to 2,400 gallons per month.⁹³ For the lowest income households, PAWC's rates are
11 acutely unaffordable at any usage level.⁹⁴

12 As a whole, Mr. Ather concludes that (1) affordability of PAWC's water/wastewater
13 service from 2012 through the forecast test period indicates that PAWC has managed its systems
14 for long-term customer benefits; (2) PAWC's water/wastewater services has been – and is
15 projected to continue to be – affordable for the majority of residential customers; and (3) there are
16 groups of customers for whom affordability of service remains a challenge.⁹⁵

17 **Q: Do you have any concerns about this needs assessment?**

18 A: Yes, very much so. I disagree strongly with Mr. Ather's methodology and conclusions
19 related to PAWC's Enterprise-Level analysis. I also disagree that the Community-Level Analysis
20 tells the full picture of affordability. Collectively, I refer to these two assessments as PAWC's
21 affordability analyses.

⁹² Id. at 19: 15-18.

⁹³ See Id.; Exhibits DFA-1, DFA-2.

⁹⁴ Id.

⁹⁵ PAWC St. 9 at 24: 9-17.

1 First, Mr. Ather’s affordability analyses rely heavily on the use of MHI. MHI is not an
2 appropriate standard by which to assess affordability for all customers. By definition, half of all
3 households have income at or below the median and low income families have significantly lower
4 income than MHI. PAWC’s reliance on MHI masks the extreme levels of unaffordability
5 experienced by the lowest income households. Further, as noted above, Charts 5 and 6 relied on
6 by Mr. Ather, are fundamentally flawed by assuming full participation in the Company’s BDP.⁹⁶
7 As stated above, just 13% of PAWC’s estimated low income customers and 30% of PAWC’s
8 confirmed low income customers are enrolled.⁹⁷

9 I note here that even based on PAWC’s Community-Level Analysis, Mr. Ather concludes
10 that roughly one-third of PAWC’s customers will receive bills that exceed broadly accepted
11 affordability standards. He then concludes that “the Company’s analysis demonstrates that
12 PAWC’s management of its operations and maintenance costs and its decisions on how to execute
13 on the capital investments needed to provide safe and reliable water service...continues to result
14 in reasonable rates for PAWC customers.”⁹⁸ I strongly disagree.

15 As discussed above and illustrated in CAUSE-PA Exhibit 1, the water and wastewater
16 burden levels and the relative depth and breadth of unaffordability for PAWC’s low income
17 customers are excessive at both existing and proposed rates, particularly when different usage
18 levels are factored into the analysis. Mr. Ather’s conclusion that the majority of PAWC customers
19 have and will continue to have affordable water/wastewater service improperly ignores the critical
20 affordability challenges of PAWC’s low income customers. It is not just, reasonable, or in the
21 public interest to obscure the underlying affordability for PAWC’s low income customers – as

⁹⁶ PAWC St. 9 at 20, Charts 5 & 6.

⁹⁷ PAWC Response to CAUSE-PA 01-004, Attachment, and 01-014, Attachment, attached hereto at Appendix B;
PAWC St. 9 Exhibits DFA-1, DFA-2.

⁹⁸ PAWC St. 9 at 24: 22 – 25:3.

1 PAWC’s affordability analyses appear to do. It is essential that the needs of low income customers
 2 for greatly improved affordability are specifically considered and reasonably addressed.

3 As noted above, Mr. Ather’s definition of basic water service also fails to properly account
 4 for varied actual usage levels of PAWC’s low income customers, resulting in disparate impacts on
 5 larger families. As illustrated by the Tables below, the average usage rate for confirmed low
 6 income customers regularly exceeds the 3,000 gallon/mo. usage rate used in PAWC’s affordability
 7 analyses:

Table 7: Mean Usage by Customer Segment - Water only⁹⁹

Yearly Average	All residential customers	Confirmed low income customers	H2O participants
2023	3,411	3,676	3,991
2024	3,416	3,854	4,539
2025	3,281	3,959	4,776

8

Table 8: Mean Usage by Customer Segment - Wastewater only¹⁰⁰

Yearly Average	All residential customers	Confirmed low income customers	H2O participants
2023	3,297	4,031	3,220
2024	3,189	4,059	3,406
2025	3,206	4,332	4,002

9

Table 9: Mean Usage by Customer Segment - Combined¹⁰¹

Yearly Average	All residential customers	Confirmed low income customers	H2O participants
2023	3,262	3,974	3,994
2024	3,162	4,035	4,469
2025	3,068	4,024	3,785

10 In reality, many low income customers have far greater usage, either because they have a
 11 larger family and/or system inefficiencies. I discuss the importance of comprehensive low income

⁹⁹ PAWC Response to CAUSE-PA 01-036, Attachment, attached hereto at Appendix B; 2025 usage level are as of May 2025, the last reported date.

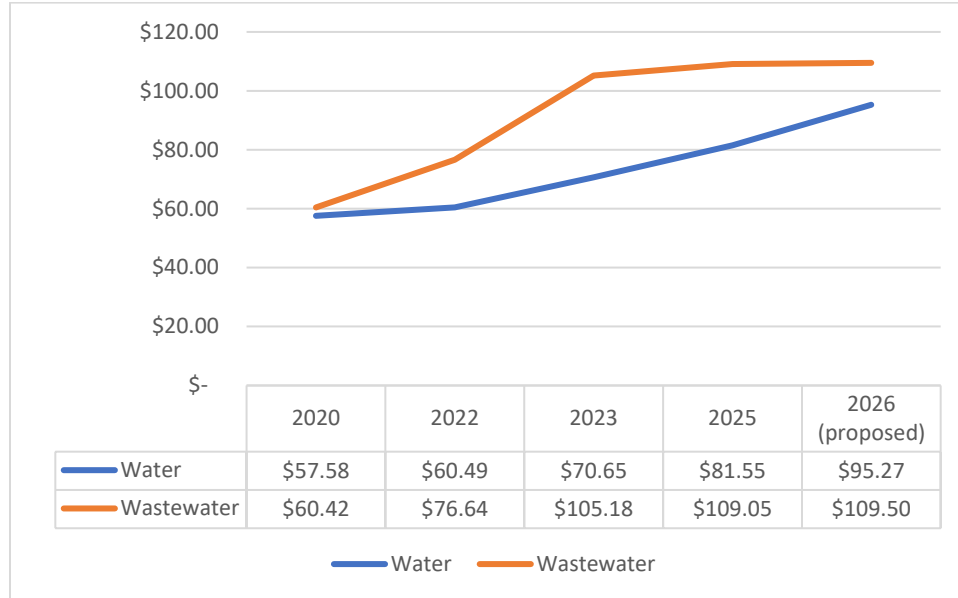
¹⁰⁰ Id.; 2025 usage level are as of May 2025, the last reported date.

¹⁰¹ Id.; 2025 usage level are as of May 2025, the last reported date.

1 leak and line repair program in detail further below, but in brief, in addition to BDP discount levels
2 that approach affordability at average usage levels, PAWC’s low income programming must also
3 address those customers with higher usage due to inefficient appliances and leaks. Failure to do
4 so undermines affordability gained through its BDP and increases costs for not only those
5 customers with the highest usage, but for the BDP program itself and, in turn, other ratepayers.

6 It is not acceptable that there are large swaths of PAWC’s customer base who will continue
7 to be priced out of access to water, a natural resource necessary for all life on earth. I also firmly
8 contest Mr. Ather’s proposition that PAWC’s rates have remained consistently low over time.
9 CAUSE-PA was a party to PAWC’s rate proceedings in 2020, 2022, and 2023. During these
10 proceedings, numerous experts (myself, included) described in extensive detail how PAWC’s rate
11 proposals – and subsequent rate increases – have come in quick succession over the last several
12 years.

1 **Table 10: Water and Wastewater Bills at Average Usage Over Time¹⁰²**



2 As the table above shows, since 2020, the average residential water bill has increased 65%,
 3 and the average residential wastewater bill has increased by 81%. These rate increases have
 4 represented fast-paced surges in the costs of life-sustaining services. Contrary to Mr. Ather’s
 5 position, if this rate request were approved, the cost of essential water and wastewater service will
 6 have increased for PAWC’s customers by nearly half a billion dollars since 2020.

7 **VII. PAWC LOW INCOME ASSISTANCE PROGRAMS**

8 **Q: Please summarize PAWC’s current low income assistance programs.**

9 A: PAWC offers customer assistance through its Help to Others (H2O) programs, which are
 10 administered by the Dollar Energy Fund (DEF).¹⁰³ Through its H2O programs, PAWC currently
 11 offers four forms of assistance to low income customers: (1) grant assistance of up to \$500 per

¹⁰² Pa. PUC v. PAWC, Docket Nos. R-2020-3019369, et al, Notice of Proposed Water and Wastewater Rate Changes (Filed April 29, 2020); Pa. PUC v. PAWC, Docket Nos. R-2022-3031672, et al., Notice of Proposed Water and Wastewater Rate Changes (Filed April 29, 2022); Pa. PUC v. PAWC, Docket nos. R-2023-3043189, et al., Notice of Proposed Water and Wastewater Rate Changes (Filed November 8, 2023); Pa. PUC v. PAWC, Docket Nos. R-2025-3057983, et al., Notice of Proposed Water and Wastewater Rate Changes (Filed November 14, 2025).

¹⁰³ PAWC Response to CAUSE-PA 01-008, attached hereto at Appendix B.

1 year for water and up to \$500 per year for wastewater for customers experiencing a temporary
 2 hardship, conditional on the availability of funds; (2) monthly bill discounts (through the Bill
 3 Discount Program – or BDP) for water and wastewater services; and, (3) arrearage forgiveness for
 4 those enrolled in its arrearage forgiveness program (AMP) which was implemented in October
 5 2024¹⁰⁴, and (4) usage reduction assistance through the availability of water-saving devices and
 6 education available to BDP customers.¹⁰⁵ To qualify for a hardship grant, a customer’s total
 7 household income must be at or below 250% FPL.¹⁰⁶ To qualify for the BDP and AMP, a customer
 8 must have income at or below 200% FPL.¹⁰⁷

9 **A. H2O Bill Discount Program**

10 **Q: Is PAWC’s BDP producing an affordable bill for program participants?**

11 A: Not consistently. Households with low usage levels and those at the higher end of the BDP
 12 eligibility guidelines have more affordable bills than others. As currently structured, PAWC’s BDP
 13 includes the following tiered discount structure for water and wastewater customers:

14 **Table 11: Existing BDP Discounts¹⁰⁸**

FPL	Current Water Discounts		Current Wastewater Discounts
	Fixed	Volumetric	Total Bill
0-50%	90%	80%	85%
51-100%	75%	65%	73%
101-150%	60%	40%	55%
151-200%	30%	20%	37%

¹⁰⁴ PAWC St. 2 at 13: 4-7; Petition of Pennsylvania-American Water Company for Approval of an Arrearage Management Plan, Order, Docket No. P-2021-3028195 (Order, Dec. 7, 2023).

¹⁰⁵ PAWC Response to CAUSE-PA 01-008, attached hereto at Appendix B.

¹⁰⁶ Id.

¹⁰⁷ Id.

¹⁰⁸ Id., Attachment 1, attached hereto at Appendix B.

1 As illustrated in CAUSE-PA Exhibit 1, the existing BDP discount rates do not produce
2 consistent levels of affordability – especially for BDP participants with the lowest income with
3 higher usages. For example, a household of four at 150% FPL using 6,000 gallons per month is
4 currently charged a monthly bill of approximately \$163.73, or 3.97% of gross household income
5 – just barely what is considered affordable by that particular metric.¹⁰⁹

6 As currently structured, PAWC’s BDP is not providing affordable bills or precise levels of
7 affordability for its participants – especially for higher usage customers. This is problematic, as,
8 in addition to the likelihood of low income households living in homes with leaks and
9 inefficiencies, these high bills disproportionately impact larger and/or multi-generational
10 households. Unlike typical electric and gas usage, water usage varies significantly by the size of
11 the household, making it even more critical to ensure that rate assistance is individualized to the
12 household based on their ability to pay.¹¹⁰

13 **Q: Is PAWC proposing any changes to its BDP?**

14 A: Yes. The Company is proposing to adjust its discount levels for both water and wastewater
15 as shown in the Table below.

16 **Table 12: Proposed BDP Discounts¹¹¹**

FPL	Proposed Water (Fixed and Volumetric)	Proposed Wastewater (Fixed and Volumetric)
0-50%	82%	82%
51-100%	67%	67%
101-150%	44%	44%
151-200%	22%	22%

¹⁰⁹ CAUSE-PA Exhibit 1-c.

¹¹⁰ Water/Color Report at 28.

¹¹¹ PAWC Statement No. 2 at 14: 20.

1 **Q: Do you support PAWC’s proposed BDP changes?**

2 A: No. As shown in CAUSE-PA Exhibit 1-c, the proposed changes to PAWC’s BDP discount
 3 levels *will result in higher bills for BDP participants at both current and proposed rates*. That is,
 4 all other things being equal, the changes proposed by PAWC would be worse for existing BDP
 5 customers at existing rates. For example, a household of four at 50% FPL using 6,000 gallons per
 6 month who is enrolled in the BDP currently has a burden of 3.87%, brushing up against the 4%
 7 standard of affordability. With the proposed changes in the BDP discount level, that same
 8 household will have a burden of 4.24%.¹¹² Once any rate increase is factored in, the proposed
 9 discounts will have even less of a mitigating effect on these unaffordable bills.

10 Analysis provided by PAWC similarly shows that average bills for BDP customers will
 11 continue to be high. For example, PAWC reports the following BDP bill amounts at proposed rates
 12 and proposed discount levels:

13 **Table 13: Proposed BDP Bills, 5,000 gal./month¹¹³**

	Proposed BDP Bill – Water	Proposed BDP Bill – Wastewater	Proposed BDP Bill - Combined
Tier 1 (0-50% FPL)	\$24.36	26.58	\$50.94
Tier 2 (51-100% FPL)	\$44.66	47.85	\$92.51
Tier 3 (101-150% FPL)	\$75.79	\$79.75	\$155.54
Tier 4 (151-200% FPL)	\$105.57	\$111.65	\$217.22

14 For example, a household of three using 5,000 gallons per month, squarely in the middle of Tier 3
 15 with monthly gross income of \$2,846 would have a water/wastewater burden of 5.5% at proposed
 16 rates, which is not considered affordable according to the Company’s own metrics. As discussed

¹¹² CAUSE-PA Exhibit 1-c.

¹¹³ PAWC Response to CAUSE-PA 01-026, Attachment, and 01-027, Attachment, attached hereto at Appendix B.

1 above regarding standards of affordability, for lower income households, even a burden of 4% can
2 be a significant financial strain on the household.

3 **Q: Are you recommending any reforms to PAWC's BDP?**

4 A: Yes. As discussed above, PAWC's current and proposed discount levels provide
5 inadequate rate assistance and inequitable bills, particularly for customers with higher usage levels.
6 Additional improvements are necessary to ensure that BDP participants are receiving consistent
7 and equitable levels of affordability.

8 In the context of past rate proceedings, I have recommended that PAWC implement a tiered
9 percentage of income payment (PIP) structure – as have other experts for CAUSE-PA and OCA.¹¹⁴
10 I stand by past analysis, which determined that implementing a PIP structure would, in the long
11 term, ensure that those with the lowest levels of FPL and/or with larger families are not paying a
12 disproportionate level of their incomes for critical and life-sustaining water/wastewater services.
13 This is particularly true as rates for basic water and wastewater services are likely to continue to
14 rise in the short term, further increasing the exigency that PAWC's program structure deliver
15 accessible, consistent, and equitable levels of affordability to economically vulnerable households.
16 However, in the event PAWC lacks the technical ability to institute a PIP, I recommend that PAWC
17 adopt shorter-term transitional revisions to the BDP discount levels but continue to strongly
18 recommend that PAWC ultimately transition to a PIP. Should PAWC undergo any systems
19 upgrades, it should be required to ensure the upgrades will support implementation of a PIP
20 structure in the future.

¹¹⁴ Pa. PUC v. PAWC, CAUSE-PA St. 1, Docket No. R-2020-3019369, et al. (Direct Testimony dated September 8, 2020); Pa. PUC v. PAWC, CAUSE-PA St. 1, Docket No. R-2022-3031672, et al (Direct Testimony dated July 29, 2022). Pa. PUC v. PAWC, OCA St. 5, Docket No. R-2022-3031672, at al (Direct Testimony dated July 29, 2022). Pa. PUC v. PAWC, CAUSE-PA St. 1, Docket Nos. R-2023-3043189, et al (Direct Testimony dated February 1, 2024).

1 In the interim, I recommend the following BDP structure and discount levels to better
 2 ensure the program produces affordable water/wastewater burdens and participants stay connected
 3 to services:

4 **Table 14: Recommended BDP Discounts**

	Water		Wastewater	
	Fixed Charge	Volumetric Charge	Fixed Charge	Volumetric Charge
Tier 1 (0-50% FPL)	100%	85%	100%	85%
Tier 2 (51-100% FPL)	100%	75%	100%	75%
Tier 3 (101-150% FPL)	100%	50%	100%	50%
Tier 4 (151-200% FPL)	100%	25%	100%	25%

5 Pursuant to this proposal, customers with income between 0%-200% FPL would see
 6 marked improvements to affordability and reductions in water/wastewater burdens. Under the
 7 Company’s BDP proposal, a family of four at 150% FPL using 50 gallons per person/day, or
 8 approximately 6,000 gallons/month, will be burdened with combined water/wastewater burdens
 9 of 4.98%,¹¹⁵ This exceeds the 4% affordability burden standard discussed above. By comparison,
 10 under my proposed modifications shown in Table 12, the same BDP participant at proposed rates—
 11 with the same household size, usage, and FPL – will have a 3.97% combined water/wastewater
 12 burden. CAUSE-PA Exhibit 1 provides additional information related to the resulting burdens
 13 under the proposed BDP structure I have recommended above.

14 At the proposed discount levels I have outlined above, BDP participants will be charged
 15 rates that are more consistently affordable, regardless of relative income level, household size, and
 16 usage levels. I note that my recommendations within the context of this proceeding should not be
 17 read as preclusive to the need for longer term improvements, including transition to a PIP, to ensure
 18 that PAWC’s BDP provides consistent, targeted affordability to its participants.

¹¹⁵ CAUSE-PA Exhibit 1-b, 1-c.

1 **Q: Do you have any concerns about the accessibility of the BDP?**

2 A: Yes. I am concerned that only a small portion of PAWC customers are currently enrolled
 3 in the BDP – far fewer than those who PAWC has already identified in its system as income
 4 eligible for the program. Specifically, in November 2025 (the last reported period), PAWC reports
 5 that 19,966 customers were enrolled in the BDP, representing just 2.9% of total residential
 6 customers (19,966 out of 667,678 residential customers).¹¹⁶ During that same period, PAWC
 7 reported having 65,898 confirmed low income customers identified in its system – or nearly 10%
 8 of total residential customers.¹¹⁷

9 **Table 15: BDP Enrollment v. Confirmed & Estimated Low Income Customers¹¹⁸**

	CLI Customers	ELI Customers	BDP Participants	CLI % Enrollment	ELI % Enrollment
Dec. 2023	62,829	152,558	29,496	47%	19%
Dec. 2024	63,459	152,558	30,610	48%	20%
Nov. 2025	65,898	152,558	19,966	30%	13%

10 As the above Table shows, while historically low compared to demonstrated need, BDP
 11 enrollment has dropped significantly between December 2024 and November 2025, even amongst
 12 customers who PAWC has confirmed to be low income. Indeed, roughly 70% of households
 13 *known by PAWC* to be eligible for its BDP are not enrolled. Tens of thousands of other low income
 14 consumers, estimated but not yet confirmed by the Company, remain unenrolled. Based on
 15 PAWC’s estimated low income customer count of 152,558, PAWC’s BDP has reached only

¹¹⁶ PAWC Response to CAUSE-PA 01-002, Attachment, and 01-014, Attachment, attached hereto at Appendix B.

¹¹⁷ PAWC Response to CAUSE-PA 01-002, Attachment, and 01-004, Attachment, attached hereto at Appendix B; I recognize that PAWC uses 250% FPL as their threshold for considering a customers confirmed low income and that their BDP is only available for customers at or below 200% FPL, however, given the large number of estimated low income households in its service territory, this is likely still under-counting the low income customers in PAWC’s service territory.

¹¹⁸ PAWC Response to CAUSE-PA 01-003, and 01-004, Attachment, attached hereto at Appendix B.

1 between 13-20% of its estimated eligible households since 2023. Critical improvements are
2 needed to ensure the program is accessible to all eligible households.

3 **Q: Do you have recommendations to improve accessibility of the BDP for PAWC's low**
4 **income customers?**

5 A: Yes. As discussed, PAWC's low rates of enrollment in the BDP evidence a need for more
6 systematic solutions to ensure that eligible low income customers are receiving more affordable
7 bills through BDP enrollment.

8 First, I recommend that PAWC set target enrollment benchmarks for the BDP. I
9 recommend enrollment targets set at 20% per year of PAWC's estimated low income customer
10 counts until the Company reaches at least 75% enrollment of this estimated group.

11 Second, PAWC should be required to establish quantitative goals related to affirmative
12 customer outreach for the purpose of enrolling low income customers in the BDP, among other
13 recommended enhancements including routine screening for program eligibility, discussed below.
14 This affirmative outreach should include telephone contacts, mailings, and forms of electronic
15 communication (with customer consent). PAWC should also be required to track and report
16 relevant data regarding its progress to its Customer Assistance Advisory Group – known as the
17 CAAG – to help refine outreach efforts based on CAAG feedback. PAWC should in turn expand
18 membership of its CAAG to include a broader array of community voices who advocate for and
19 assist households in need of assistance from all corners of PAWC's expansive service territory.

20 **B. Arrearage Management Program and Analysis**

21 **Q: Please describe PAWC's Arrearage Management Program (AMP).**

22 A: The AMP provides an alternative path to collections for low income households – helping
23 prevent termination while improving bill payment frequency and coverage rates. As part of the

1 AMP, customers receive a \$25 arrearage forgiveness credit in exchange for each full and timely
2 monthly payment.¹¹⁹ Customers must also have a balance of at least \$150 that is at least 60 days
3 past due in order to enroll.¹²⁰ While not mentioned in testimony, PAWC also requires that
4 customers pay a \$5 co-pay if enrolled in the AMP.¹²¹ The AMP launched on October 1, 2024.

5 **Q: Is PAWC proposing any changes to its AMP?**

6 A: No.

7 **Q: Do you have any concerns with PAWC's AMP as currently structured?**

8 A: Yes, I have concerns regarding both the accessibility and structure of the AMP.

9 First, PAWC has 19,966 customers enrolled in its BDP as of November 2025, but merely
10 3,739 of those customers are enrolled in the AMP component of its BDP.¹²² This is despite the
11 fact that, since October 2024, when the AMP was implemented, 7,441 customers with balances
12 were enrolled into the BDP.¹²³ In no month, from October 2024 until November 2025, did BDP
13 enrollees have an average arrearage of less than \$150. In several months, that average exceeded
14 \$1,000 for PAWC wastewater customers.¹²⁴ Further, since October 2024, PAWC has issued
15 21,095 payment arrangements to BDP enrollees.¹²⁵ As of December 2025, 4,938 of those BDP
16 enrollees made fewer than three payments under a payment arrangement,¹²⁶ and merely 7,377, less
17 than 35%, successfully completed the arrangement.¹²⁷

18 This indicates to me that PAWC has been unsuccessful in implementing its AMP. While it
19 is not clear why, as both programs are managed by PAWC's third-party administrator Dollar

¹¹⁹ PAWC St. 2 at 13: 4-5.

¹²⁰ PAWC Response to CAUSE-PA 01-008, attached hereto at Appendix B.

¹²¹ PAWC Response to CAUSE-PA 01-008, attached hereto at Appendix B.

¹²² PAWC Response to CAUSE-PA 01-015, and 01-016, Attachment, attached hereto at Appendix B.

¹²³ PAWC Response to CAUSE-PA 01-022, Attachment, attached hereto at Appendix B.

¹²⁴ PAWC Response to CAUSE-PA 01-022, Attachment, attached hereto at Appendix B.

¹²⁵ PAWC Response to CAUSE-PA 01-041, Attachment, attached hereto at Appendix B.

¹²⁶ PAWC Response to CAUSE-PA 01-042(b), Attachment, attached hereto at Appendix B.

¹²⁷ PAWC Response to CAUSE-PA 01-042(f), Attachment, attached hereto at Appendix B.

1 Energy Fund, PAWC is clearly running these programs as two distinct offerings, rather than as a
2 comprehensive assistance program. PAWC claims that when a customer enrolls in the BDP, the
3 customer is automatically enrolled in the Company's AMP if the arrears balance is at least \$150
4 and 60 or more days old.¹²⁸ However, the numbers above seem to belie this claim.

5 **Q: Do you have any recommendations regarding the accessibility of PAWC's AMP?**

6 A: Yes. All BDP participants that have qualifying arrears and are not enrolled in the AMP
7 should be enrolled within 90 days of the effective date of rates. PAWC should work with its
8 CAAG to develop outreach and education to these customers to explain that their arrears will
9 be forgiven with each in full BDP payment moving forward and that they do not have to enter a
10 payment arrangement to receive this forgiveness.

11 PAWC should also allow all new BDP participants who have arrears to automatically be
12 enrolled in the AMP without an additional application and without additional steps. In other
13 words, the BDP and AMP should be viewed as two components that are integrated as part of an
14 overall customer assistance program, not as separate programs.

15 **Q: What are your concerns regarding the structure of the AMP?**

16 A: I have several concerns regarding the structure of the AMP, including: 1) the requirement
17 that a customer have a debt of at least \$150 in order to enroll, 2) that PAWC is charging its AMP
18 participants a \$5 co-pay, 3) that a payment must be timely in order for the enrollee to receive
19 forgiveness, and 4) that PAWC is only forgiving \$25 with each payment made regardless of the
20 underlying balance.

21 First, any customer with a balance who enrolls in the BDP should have that balance set
22 aside or frozen at enrollment, regardless of the size of the balance. For a household with extremely

¹²⁸ PAWC Response to CAUSE-PA 02-001, attached hereto at Appendix B.

1 limited means, any amount that they are required to pay above and beyond a discounted rate chips
2 away at affordability gained by enrolling in the BDP and places that household at risk of falling
3 further behind and having their service involuntarily terminated. If a household has \$100 in arrears
4 and needs to enroll in BDP, they cannot pay their current full tariff bills in full so there is no reason
5 to believe they will be able to make payments on their arrearages.

6 Second, PAWC should not be charging its AMP customers a co-pay. Even with a BDP
7 discount, bills remain unaffordable for many low income customers and the addition of a co-pay
8 serves to undermine any affordability improvements gained through the program. As a flat fee,
9 this charge is regressive, meaning that it harms the lowest income households most severely.

10 The Commission has looked with disfavor on these co-pays and has on multiple occasions
11 rejected the continued imposition of additional fees on CAP participants and arrearage co-pay
12 amounts.¹²⁹ Additionally the Commission’s Final CAP Policy Statement provides “[E]ach utility
13 CAP payment plan should be designed to ensure a household’s total CAP bill – including any add-
14 ons such as PPA co-payments or CAP Plus charges – will not exceed the Commission’s energy
15 burden threshold.”¹³⁰ While I recognize that this policy statement applies specifically to CAPs
16 provided by electric and natural gas utilities, it is instructive for PAWC as well. PAWC’s \$5 co-
17 pay is being charged to customers in need of rate assistance, with demonstrated inability to pay.
18 These are customers who have provided detailed income documentation to PAWC to enroll in a
19 program designed to improve affordability and help keep them connected to essential water and
20 wastewater service. I have detailed above the insufficiency of PAWC’s current and proposed

¹²⁹ See Peoples Universal Service and Energy Conservation Plan for 2019-2024, Petition for Reconsideration of Staff Action, Docket Nos. M-2018-3003177, M-2020-3021343, P-2020-3017641, M-2014-2432515, at 5-6 (filed July 20, 2022); Columbia Universal Service and Energy Conservation Plan for 2024-2028 , Docket No. M-2023-3039487, Order at 28 (filed April 4, 2024).

¹³⁰ 2019 Amendments to CAP Policy Statement, Final Policy Statement and Order, Docket No. M-2019-3012599 (Order entered Nov. 5, 2019) (hereafter, CAP Policy Statement) at 31.

1 discount rates, by adding an additional \$5 copay, PAWC is raising the burden of those households
2 it knows are already struggling to keep up. Thus, I proposed the \$5 co-pay be eliminated.

3 Third, I am concerned that PAWC does not clearly allow AMP participants to earn
4 forgiveness on catch-up payments. In my experience working with low income households, most
5 try to pay their bills in full and on time when they are able, but there are often setbacks that make
6 timely payments difficult to achieve. PAWC should provide arrearage forgiveness for each full
7 payment that a customer makes. Refusal to provide forgiveness because these payments do not fall
8 within a narrow time period fails to recognize the economic reality of low income households and
9 penalizes low income customers who, through no fault of their own, often face additional
10 economic pressures as a result of fluctuations in their monthly incomes, financial emergencies,
11 and other unforeseen expenses which stretch their already limited monthly budgets. The AMP is
12 an alternative collections program which should be designed to incentivize low income households
13 with insufficient resources to prioritize payment of PAWC bills. Providing earned forgiveness for
14 all in-full payments, regardless of timeliness, will help incentivize in-full payments – thereby
15 reducing collections costs and improving bill payment.

16 The AMP should be designed to adequately acknowledge the realities faced by low
17 income households who, by definition, have inadequate incomes to pay for necessities, including
18 housing costs, food, energy costs, childcare, and transportation. As such, PAWC's policies should
19 be modified to make clear that AMP participants will receive forgiveness for each in full payment
20 regardless of whether the payment is made on time.

21 Finally, I am concerned that the AMP does not offer adequately structured relief to ensure
22 participants are able to catch up on arrears accrued prior to entry into the BDP. Low income
23 customers carry a substantial level of arrears that the \$25 per month arrearage forgiveness structure

1 is not sufficient to address. The chart below shows the growing arrearage levels of customers
 2 enrolled in the BDP at the time of enrollment.

3 **Table 16: Average Arrearage Levels of BDP enrollees¹³¹**

	Water Only Customers	Months to full forgiveness¹³²	Wastewater Only Customers	Months to full forgiveness	Combined Customers	Months to full forgiveness
2023	\$422.01	16.88	\$609.70	24.39	\$507.39	20.30
2024	\$503.52	20.14	\$742.35	29.69	\$545.17	21.81
2025	\$621.92	24.88	\$1,033.71	41.35	\$654.21	26.17

4 When the AMP was agreed to in the 2023 rate case settlement, most BDP enrollees would
 5 have been able to retire their arrears in a reasonable time frame with the current forgiveness
 6 structure of \$25 per month. However, with the intervening rate increase and increasing economic
 7 pressures on low income households, the average arrearage levels for BDP enrollees at the time of
 8 enrollment have increased steadily since 2023 for every customer segment. The increasing arrears
 9 of low income customers shows the need for robust arrearage forgiveness to address preprogram
 10 arrearages accrued by low income customers as a result of underlying rate unaffordability.

11 The average arrearage level for a wastewater customer who enrolled in the BDP in 2025 is
 12 over \$1,000, which would take 41 months to fully retire under the current AMP structure. Many
 13 BDP applicants will have arrearage amounts exceeding these averages, and thus face even longer
 14 periods before they can earn full forgiveness.

15 My primary recommendation is that PAWC transition to a percentage of forgiveness
 16 structure over 24 months, so that with each payment, 1/24th of the customer’s debt is forgiven.
 17 This would ensure that even those customers with the highest debt levels upon enrollment would

¹³¹ PAWC Response to CAUSE-PA 01-022, Attachment, attached hereto at Appendix B; chart compiled by taking weighted averages of the mean arrearage levels provided in 01-022, Attachment.

¹³² Assuming all bills during the period are paid in full and on time.

1 still be able to receive full forgiveness within a reasonable time frame. If the Company is not able
2 to institute that specific forgiveness structure due to technological constraints, my secondary
3 recommendation is to increase the flat rate forgiveness to \$45 per month. At that rate, while some
4 customers may still take longer than 24 months to retire their full balances, the vast majority will
5 be receiving forgiveness within a reasonable timeframe.

6 **C. Hardship Fund Analysis and Recommendations**

7 **Q: Is PAWC proposing any changes to its Hardship Fund in the context of this**
8 **proceeding?**

9 A: No. As currently structured, PAWC customers at or below 250% FPL may receive a
10 Hardship Fund grant of up to \$500 annually toward their water bill and \$500 annually toward their
11 wastewater bill.¹³³

12 For the 2025 to 2026 program year, the Company is contributing \$1.45 million to the
13 hardship fund. On October 9, 2025, the Commission approved a settlement at Docket No. A-2025-
14 3052983 permitting PAWC to acquire the EBMA wastewater system. As part of that settlement,
15 PAWC agreed to contribute a total of \$100,000 to its hardship fund either (1) in installments over
16 the five-year period after closing of the acquisition, or (2) as a one-time contribution within 60
17 days after closing. These donations are funded by PAWC's shareholders and not recovered from
18 customers.¹³⁴

19 **Q: Do you have any concerns related to PAWC's Hardship Fund?**

20 A: Yes. First, I am concerned about the low number of customers who have been awarded a
21 grant through PAWC's Hardship Fund. The following number of customers received a Hardship

¹³³ PAWC Response to CAUSE-PA 01-008, attached hereto at Appendix B.

¹³⁴ PAWC St. 2 at 13: 12-19.

1 Fund grant, by year and across PAWC’s divisions: 1,631 in 2023; 1,754 in 2024; 4,862 in 2025
 2 (through November).¹³⁵ The low number of customers awarded PAWC’s Hardship Fund grants
 3 significantly fails to address the much larger need for grant assistance for low income customers.
 4 The following Table compares the number of PAWC Hardship Fund grants issued, by year and
 5 across service types, compared to the termination rate for nonpayment for confirmed low income
 6 customers:

7 **Table 17: Hardship Fund Grants issued v CLI Termination for Nonpayment, By Year**

	Hardship Fund Grants¹³⁶	CLI Termination for Non-Payment¹³⁷
2023	1,631	8,822
2024	1,754	7,277
2025¹³⁸	4,862	9,922

8 As shown in the above Table, a substantial number of confirmed low income customers
 9 have been terminated for nonpayment in recent years, compared to the number of Hardship Fund
 10 grants that have been issued.

11 As discussed, low income customers carry substantial levels of arrears that are
 12 disproportionate to the average arrears carried by residential customers as a whole. As of
 13 November 2025, the average arrearage level of confirmed low income customers was \$341.19
 14 compared to the residential average arrearage level during this same period of \$224.90.¹³⁹ By
 15 definition, a significant portion of low income customers in these segments will have arrearage

¹³⁵ PAWC Response to CAUSE-PA 01-017, Attachment, attached hereto at Appendix B.

¹³⁶ *Id.*

¹³⁷ PAWC Response to CAUSE-PA 01-030, Attachment, attached hereto at Appendix B.

¹³⁸ 2025 numbers are through November.

¹³⁹ PAWC Response to CAUSE-PA 01-034, Attachment, attached hereto at Appendix B.

1 levels exceeding these averages, which places these customers at risk of termination of life-
2 sustaining water/wastewater services.

3 The underspending of PAWC's Hardship Fund, coupled with the clear and substantial
4 unmet need for grant assistance amongst PAWC's low income customers, underscores the need
5 for PAWC to improve its accessibility and benefits provided under its Hardship Fund program.

6 While PAWC projects certain improvements to the funding and expansion of eligibility to
7 its Hardship Fund, it appears that these commitments are in the context of its BASA Settlement.
8 However, the BASA Settlement was predicated on the need for Hardship Fund improvements *at*
9 *current rates* – and did not contemplate the substantial additional rate increase PAWC is seeking
10 in this proceeding.

11 **Q: Do you have any recommendations related to PAWC's Hardship Fund?**

12 A: Yes. In light of the underutilization of PAWC's Hardship Fund, coupled with the
13 substantial need for Hardship Fund grants to prevent the loss of water and wastewater service, I
14 recommend that PAWC be required to take immediate steps to improve the efficacy and
15 accessibility of its Hardship Fund.

16 Specifically, I recommend that PAWC increase the maximum amount of its Hardship Fund
17 grant from \$500 for water and wastewater, respectively. In November 2025, the average arrearages
18 of BDP participants at the time of termination was \$1,552.24,¹⁴⁰ for confirmed low income
19 customers, exclusive of BDP customers, that amount was \$3,332.15.¹⁴¹ I recognize that this
20 extremely high amount may be an outlier, however in October 2025, that amount was \$762.96,
21 still well above the \$500 grant threshold.¹⁴² To attempt to better address the high levels of arrears

¹⁴⁰ PAWC Response to OCA 04-022(f), Attachment, attached hereto at Appendix B.

¹⁴¹ PAWC Response to OCA 04-021(f), Attachment, attached hereto at Appendix B.

¹⁴² Id.

1 carried by PAWC’s low income customers, I recommend an increase of the maximum Hardship
2 Fund grant to \$750 for water and \$750 for wastewater.

3 Further, PAWC indicated in its previous rates case that it was working with DEF to develop
4 IT enhancements to process multiple Hardship Fund grants per year, up to the maximum grant
5 amount.¹⁴³ However, it is unclear whether that update has been made. I therefore recommend that,
6 if not already implemented, PAWC be required to allow income-qualified water and wastewater
7 customers to receive multiple Hardship Fund grants per year, up to the maximum \$750 for water
8 and wastewater, respectively. This is similar to how the LIHEAP Crisis Grant has functioned in
9 Pennsylvania for decades.

10 **D. Consumer Education and Outreach, and Customer Screening**

11 **Q: Do you have any other concerns related to PAWC’s low income assistance programs**
12 **in the context of this testimony?**

13 A: Yes. As discussed, I am concerned that PAWC’s low income assistance programs remain
14 woefully undersubscribed - reaching just a fraction of PAWC’s low income customers. This
15 customer data discussed thoroughly throughout my testimony evidences wide discrepancies
16 between need and actual assistance provided. Additional systematic solutions are imperative to
17 ensure that PAWC’s low income customers can enroll in assistance programs.

18 I am similarly concerned that PAWC’s low income customers are not being proactively
19 referred to the BDP/AMP and Hardship Fund in a timely manner to prevent the buildup of
20 unmanageable arrears that lead to termination of services. Between January 2023 and November
21 2025, 14,601 BDP enrollees had unpaid arrears at the time of enrollment.¹⁴⁴ Further, since

¹⁴³ Pa. PUC v. PAWC, CAUSE-PA St. 1, Docket Nos. R-2023-3043189, et al at 53; (Direct Testimony dated February 1, 2024).

¹⁴⁴ PAWC Response to CAUSE-PA 01-022, Attachment, attached hereto at Appendix B.

1 November 2024, the month *after* the AMP was implemented, PAWC has issued over 68,000
2 payment arrangements to confirmed low income households.¹⁴⁵ This leads me to conclude that
3 potentially eligible customers are not proactively screened to determine whether they would
4 benefit from a lower rate through PAWC's BDP prior to the development of significant arrearages.
5 Early intervention to prevent and/or reduce arrearage accumulation benefits all ratepayers.
6 Although PAWC has systems in place to offer to assess customers who self-initiate contact to
7 express their inability to pay or request an installment plan, the Company lacks a requirement for
8 customer service staff to reasonably ensure that customers are being timely matched to available
9 rate assistance through the BDP, and other H2O assistance programming, prior to the accrual of
10 arrears.

11 PAWC requests income information from customers under specific circumstances,
12 including (1) when a residential customer expresses an inability to pay their bill; (2) when a
13 customer requests an extension of their current bill; (3) when a customer requests an installment
14 plan on a high current bill; (4) when a customer requests an installment plan on a past due balance;
15 (5) when a customer does not pay their past due balance over the phone at the end of a call
16 addressing a balance; (6) when a customer has received a disconnection notice; and (7) when a
17 customer requests information about hardship grants.¹⁴⁶

18 PAWC policies, procedures, and training materials for its frontline customer service call
19 staff, while helpful *after* a payment crisis has developed, do not, however, require that staff
20 affirmatively screen for eligibility to ensure payment troubled customers are given the opportunity
21 to enroll in the BDP and access hardship funding *prior* to being placed in potentially unaffordable

¹⁴⁵ PAWC Response to CAUSE-PA 01-041, Attachment, attached hereto at Appendix B.

¹⁴⁶ PAWC Response to OCA 03-002 Attachment, Confidential. I have been advised by counsel for CAUSE-PA that counsel for PAWC agreed to waive confidentiality of the specific language cited here from PAWC's confidential response to OCA 03-002.

1 payment arrangements. This apparent deficiency inappropriately prevents low income customers
2 from enrolling in available assistance programs *before* debts are accrued.

3 To its credit, PAWC has conducted certain consumer outreach and education efforts related
4 to its low income assistance programs in recent years. PAWC witness Justin L Ladner described
5 in his direct testimony how PAWC engages in such outreach and education through a variety of
6 methods, including direct customer communications, Commission events, local community events
7 and door-to-door canvassing.¹⁴⁷ Moreover, it appears that PAWC has targeted several specific
8 communities identified by percentage of customers at or below 150% FPL throughout 2025.¹⁴⁸

9 However, PAWC reports that documentation-based income verification implemented in
10 early 2025 reduced BDP enrollment by more than half – from approximately 30,000 customers to
11 approximately 14,000 customers.¹⁴⁹ PAWC further reports that subsequent outreach efforts
12 restored enrollment to approximately 21,500 customers by September 2025.¹⁵⁰ This record
13 indicates that outreach was used primarily to recover lost enrollment rather than to expand access
14 to previously unenrolled eligible low income households, and the programs remain
15 undersubscribed. As mentioned before, this concern is reinforced by PAWC’s own data.

16 While I acknowledge that PAWC appears on its face to have improved efforts to conduct
17 outreach and engagement related to its low income assistance programs, I am concerned that
18 PAWC’s low income assistance programs nevertheless remain severely undersubscribed. The test
19 of success must rest on measurable results, not merely measurable efforts. It is essential that
20 additional systematic approaches are implemented so that eligible low income customers can learn

¹⁴⁷ PAWC St. 1 at 20-21.

¹⁴⁸ *Id.*

¹⁴⁹ PAWC St. 2 at 32: 3–12.

¹⁵⁰ *Id.* at 33: 1–10.

1 about and ultimately enroll in assistance to combat unaffordability, both at existing and proposed
2 rates.

3 **Q: Do you have any recommendations related to the undersubscription of PAWC's low**
4 **income assistance programs you outline above?**

5 A: Yes. To address the continued low enrollment rates of PAWC's assistance programs, I
6 recommend that PAWC implement several systematic enhancements concerning its consumer
7 outreach and education efforts related to its low income assistance programs.

8 As an overarching matter, I recommend that the Commission require PAWC to develop
9 and submit a comprehensive Universal Service Plan for Commission review and approval
10 concurrent with the Company's next rate case. Currently, as a jurisdictional water/wastewater
11 utility, PAWC is not required to submit periodic plans related to their low income assistance
12 programming for Commission review and approval. This leaves a substantial gap for Commission
13 staff, consumers and utility advocates, who must rely on PAWC's tariffs and the information that
14 can be pieced together from websites and outreach materials, to determine important program
15 rules, polices, and procedures for the Company's low income assistance programs. This is a
16 customer service issue, and the absence of a comprehensive plan engenders consumer confusion
17 and hampers consumers' ability to learn about and ultimately enroll in assistance programs.

18 I similarly recommend that PAWC be directed to develop a detailed consumer education
19 and outreach plan (CEOP) for inclusion in the Universal Service Plan I recommend above. The
20 continued undersubscription of PAWC's low income assistance programs, as described, evidences
21 a need for a more coordinated and comprehensive approach to consumer outreach and education
22 related to PAWC's low income assistance programs that does not rely on customer self-advocacy.
23 PAWC's CEOP should be developed with input from parties and stakeholders through PAWC's

1 CAAG and should set forth how PAWC will specifically promote and coordinate each of its low
2 income programs. This Plan should be tailored to the demographics of the Company's service
3 territories; include targeted outreach to specific at-need and historically underserved consumers
4 and communities, including customers with Limited English Proficiency; identify efforts to
5 educate and enroll customers at or below 50% FPL in assistance programming; and include
6 measurable goals and clear metrics to evaluate performance.

7 I am supportive of identification of low income customers through the processes currently
8 utilized by the Company. However, I believe that given the broad disparities in access to service
9 for low income families across PAWC's service territory, documented throughout, more
10 systematic approaches must be taken to affirmatively identify households eligible for assistance
11 through the BDP or other programs. Therefore, I recommend that PAWC implement regular
12 income screening for all new or moving customers, so that low income customers are more
13 routinely identified so that they may enroll in available assistance programming. For existing
14 customers, PAWC should routinely screen for income on any non-emergency calls, and/or should
15 inquire whether there have been updates to any income information already noted on accounts.
16 Customers should be able to opt out of disclosing their income if they choose but should first be
17 informed that they may be eligible for a lower rate, debt forgiveness, or water conservation
18 measures. When establishing an account, all applicants for new service should be informed of the
19 availability of low income assistance programming and requested to voluntarily self-disclose any
20 changes to income information. PAWC should be required to update their call scripting and
21 checklists for its Customer Service Representatives (CSRs), accordingly. All customers identified
22 as low income through this process should be referred for enrollment in PAWC's low income

1 assistance programs through a warm referral process that does not require the customer to provide
2 duplicative information.

3 As discussed, I am also concerned that low income customers are not currently being
4 directed to the BDP/AMP and Hardship Fund *prior to* being required to enter into payment
5 arrangements. While payment arrangements can be an important tool to manage accrued arrears,
6 they can also serve to exacerbate unaffordability when the terms do not establish a reasonably
7 affordable monthly bill. For low income customers, unaffordable payment arrangements can
8 exacerbate payment trouble – causing them to fall further into utility debt. The BPD and AMP
9 programs have been specifically developed in recognition of the limitations of the traditional
10 payment arrangements. Utilization of the BPD and AMP programs should be the PAWC priority.
11 Low income customers should be directed *first* to low income assistance programming, prior to
12 being placed in a payment arrangement.

13 I therefore recommend that PAWC be required to revise its policies, procedures, and
14 training materials to reflect that customers who provide information related to payment troubles,
15 inability to pay, or low income status should be assisted to apply for PAWC's programs *before*
16 they are provided with the option to enroll in payment arrangements. Similarly, PAWC should be
17 required to review its policies, procedures, and training materials to ensure that entrance into a
18 payment arrangement is not required prior to qualifying for assistance through any PAWC
19 assistance program. PAWC should not enter into any payment arrangements with a potential
20 income-eligible customer unless and until they have received that customer's explicit confirmation
21 that they are declining to enroll in the BDP and AMP, and/or apply for a hardship fund grant.
22 Similarly, PAWC should ensure that DEF's policies, procedures, and training materials related to

1 its administration of PAWC's assistance programming reflect these policy and procedural
2 revisions.

3 **E. Water Conservation and Line Repair/Replacement Assistance**

4 **Q: Please describe PAWC's current water efficiency assistance programming?**

5 A: PAWC's H2O program offers certain water conservation assistance to H2O participants.¹⁵¹
6 Specifically, the water conservation component of the H2O program includes water conservation
7 kits containing basic, self-installed water-saving devices (low-flow showerhead, sink aerator, and
8 toilet fill cycle diverter), leak detection kit, conservation tips and materials, and a water use
9 calculator for qualifying customers.¹⁵²

10 **Q: Does PAWC currently operate a low income line replacement and/or repair**
11 **program?**

12 A: The Company currently does not provide service line or leak repair assistance to any
13 customers.¹⁵³

14 **Q: Do you have any concerns about PAWC's water efficiency programming?**

15 A: Yes. I am concerned that PAWC lacks a comprehensive conservation assistance program
16 that addresses both water efficiency and the financial burden of leak and line repairs and
17 replacements for its low income customers. The Company distributed 1,195 conservation kits in
18 2023 and 2,881 kits in 2024.¹⁵⁴ The sharp decline to just 882 conservation kits distributed in 2025
19 raises more serious concerns about program continuity and commitment.¹⁵⁵ This reduction,
20 coupled with PAWC's failure to track whether kits were installed or achieved any actual water

¹⁵¹ PAWC St. No.2 at 13: 20-22.

¹⁵² Id.

¹⁵³ PAWC Response to CAUSE-PA 01-020, attached hereto at Appendix B.

¹⁵⁴ PAWC Response to CAUSE-PA 01-021, Revised Attachment, attached hereto at Appendix B.

¹⁵⁵ Id.

1 savings, demonstrates significant gap in the effectiveness of the existing outreach and follow up
2 evaluation efforts for the water conservation kits and education materials. Aside from the
3 education materials citing EPA estimates (e.g., 2,900 gallons/year saved by replacing a
4 showerhead, 0.5–1.5 gallons per flush saved by the diverter), PAWC does not provide any measure
5 of actual impact, leaving its current conservation efforts unverified and insufficient.¹⁵⁶

6 As shown in Tables 7-9 (Mean Usage by Customer Segment), *supra*, PAWC’s low income
7 customers have higher average usage levels compared to residential customers as a whole. For
8 example, from January through May 2025, PAWC reported that – for water service – the mean
9 usage level for confirmed low income customers was 3,959 gallons and the mean usage level for
10 H2O participants was 4,776 gallons – compared to the mean usage level for residential customers
11 generally of 3,281 gallons during this same period.¹⁵⁷

12 As I have referenced throughout, low income households are more likely to have higher
13 water usage often due to old or inefficient appliances and fixtures, and leaky plumbing – and may
14 experience higher usage levels as a result.¹⁵⁸ Low income customers most often lack enough
15 discretionary income to reasonably afford the high costs of unexpected repairs – including indoor
16 plumbing leaks and customer-side service line issues. When such leaks occur, they drive up
17 monthly water usage and bills increase, often leading to involuntary service terminations.

18 According to PAWC policies, customers with a damaged customer-side service line can
19 access no cost repairs if the customer-side line is determined to be a lead containing service line.
20 However, if the customer-side service line does not contain lead, no such cost assistance is

¹⁵⁶ PAWC Response to CAUSE-PA 01-020, Attachment, attached hereto at Appendix B.

¹⁵⁷ Table 7-9, *supra*.

¹⁵⁸ 2024 EPA report at 9.

1 available – even though the leak (and the corresponding high bills) remains.¹⁵⁹ Customers must
2 either rely on their own funding sources, or third-party protection plans that come at additional
3 monthly costs, to afford the costs of needed repairs. This is particularly concerning as PAWC has
4 a policy to terminate service to customers who do not make repairs to leaking customer-side
5 service lines, or do not make arrangements with the Company for needed repairs, after notices are
6 provided to customers.¹⁶⁰

7 PAWC’s Leak on Owner’s Side (LOOS) process only keeps track of when a customer-side
8 leak is found and how the repair moves forward, but the Company does not track cases specifically
9 for BDP customers or whether these leaks end up causing high bills that eventually lead to service
10 terminations.¹⁶¹ As stated above, the Company distributed over 5,000 conservation kits between
11 January 2023 and December 2025, but does not track whether customers actually install the kits
12 or if they reduce household water usage.¹⁶² PAWC says it does not collect this information because
13 customers are responsible for installing the items and do not report back to the Company. Since
14 each kit costs between \$11.80 and \$16.75, the Company has spent approximately \$59,000 to
15 \$84,000 on this effort.¹⁶³ Without tracking results, it is unclear whether this program is reducing
16 water usage or lowering bills, highlighting the need for a more accountable and results-focused
17 conservation program. The absence of this data on their existing water efficiency programming is
18 deeply concerning and underscores the need for more comprehensive programming and a leak-
19 repair needs assessment for low income customers.

¹⁵⁹ <https://www.amwater.com/paaw/water-quality/lead-and-drinking-water/lead-service-line-replacement-program>.
(Last visited January 16, 2026).

¹⁶⁰ PAWC Response to CAUSE-PA 03-001, attached hereto at Appendix B.

¹⁶¹ PAWC Response to CAUSE-PA 03-004, attached hereto at Appendix B.

¹⁶² PAWC Response to CAUSE-PA 03-003, attached hereto at Appendix B.

¹⁶³ *Id.*, Attachment, attached hereto at Appendix B.

1 **Q: Do you have any recommendations related to the need for line repair and additional**
2 **conservation assistance amongst PAWC's low income customers?**

3 A: Yes. I recommend that PAWC develop and implement a comprehensive conservation and
4 leak and line repair/replacement program available to all customers at or below 250% FPL. A
5 comprehensive conservation and leak repair/replacement assistance program will help to reduce
6 wasteful and expensive usage and control H2O program costs. With the existing unaffordability at
7 current rates, the substantial rate increase that PAWC is proposing, and the comparatively high
8 usage among its low income customers, a comprehensive water efficiency and leak repair program
9 is essential to mitigate the costs of unaffordability both at existing and proposed rates for its low
10 income customers.

11 I further recommend that PAWC be required to work with its CAAG to develop this
12 comprehensive assistance program no later than 6 months after the final order in this proceeding.
13 This program should include conservation measures, including provision of water conservation
14 kits, but also include deeper savings measures – including leak repair and line replacement. Low
15 income customers most often lack the discretionary income to participate in a rebate program, so
16 the program should – at a minimum – be designed to deliver line repair and efficiency measures
17 with no out-of-pocket or up-front costs – either for the measures or for installation. The proposed
18 program should also include annual reporting parameters of water savings achieved and any
19 associated reduction in low income assistance program costs as a result of these programs. This
20 program should be available to all low income customers with income at or below 250% FPL but
21 should target high usage low income customers enrolled in PAWC's BDP. This targeting will have
22 the added benefit of further reducing the cost of PAWC's BDP.

1 Finally, PAWC should be required to coordinate its service delivery with other utilities in
2 its service territories that operate energy efficiency and conservation programs, such as Low
3 Income Usage Reduction Programs (LIURP) and Act 129 programs. Many utility conservation
4 programs already provide a number of energy efficiency measures that also increase water
5 efficiency, such as low flow faucets and shower heads.¹⁶⁴ Partnering with other energy efficiency
6 programs will not only allow PAWC to leverage other utility conservation programs to help
7 streamline program delivery and reach, helping ensure that a greater number of PAWC customers
8 can obtain comprehensive conservation measures to reduce their overall water and energy usage.

9 I note that I made these recommendations regarding a low income leak repair program in
10 PAWC's last rate case filed in 2023.¹⁶⁵ The Administrative Law Judges in that case recommended
11 that the Commission reject my proposal that PAWC be required to design and implement a
12 comprehensive conservation and line repair and replacement plan.¹⁶⁶ While finding that "such a
13 program would certainly be beneficial to PAWC's ratepayers," the ALJs agreed with PAWC that
14 LIURPs (and similar programs) are currently only required under Pennsylvania law for EDCs and
15 NGDCs.¹⁶⁷ Without statutory authority mandating LIURPs for water companies, the ALJs
16 concluded that it "would be inappropriate to impose such a requirement **on PAWC alone.**"
17 (emphasis added)¹⁶⁸ That consideration is no longer material as AQUA PA, Pittsburgh Water, and
18 Veolia all administer low income leak repair and conservation programs,¹⁶⁹ leaving PAWC as the

¹⁶⁴ See 52 Pa. Code § 58.14.

¹⁶⁵ PA P.U.C. v. Pennsylvania American Water Company, Docket No. R-2023-3043189, Direct Testimony of Harry S. Geller, Esq. (Filed February 1, 2024) at 63:5-11.

¹⁶⁶ Id., Recommended Decision at 334.

¹⁶⁷ Id., see also 52 Pa. Code § 58.1.

¹⁶⁸ Id.

¹⁶⁹ <https://www.pgh2o.com/residential-commercial-customers/customer-assistance-programs/line-repair-and-conservation-pilot>; <https://www.aquawater.com/customers/customer-assistance-programs/aqua-leak-repair-program>; <https://www.veolianorthamerica.com/media/press-releases/veolia-expands-financial-assistance-program-now-serves-customers-pennsylvania>.

1 lone outlier among Pennsylvania’s large investor-owned water utilities that does not provide this
2 essential and Commission approved program for its low income customers.

3 **F. Renter Assistance Pilot Program**

4 **Q: Are there any other matters you would like to address regarding PAWC’s low**
5 **income programming?**

6 **A:** Yes. PAWC is proposing a Renter Assistance Pilot Program (RAPP), which would provide
7 quarterly stipends to tenants in master-metered buildings meant to approximate the discounts they
8 would be receiving if they were customers of PAWC and enrolled in the BDP.¹⁷⁰

9 As proposed, PAWC would apply its average level of residential water customer usage of
10 3,263 gallons per month. Using a household’s income level, PAWC would calculate what their
11 bill discount would be if they were enrolled in the BDP and using 3,263 gallons per month. If the
12 household’s income level is at 150% of FPL, they would receive quarterly stipends of the monthly
13 bill discount amount of \$41.92 (average usage x percentage discount) x 3 equaling \$125.76. If the
14 household’s income level is at 50% FPL, they would receive quarterly stipends of the monthly bill
15 discount amount of \$78.12 (average usage x percentage discount) x 3 equaling \$234.36.¹⁷¹ These
16 would be in the form of cash payments funded through customer rates but paid directly to non-
17 customers who are renters.

18 Once a tenant applies for the RAPP, DEF, who currently administers PAWC’s existing low
19 income programming would 1) review the income documentation, 2) confirm that the household
20 is income eligible for the program, 3) confirm that the household resides in a master-metered

¹⁷⁰ PAWC St. 2 at 15. I note that throughout the description of this proposed program, PAWC refers to these tenants as customers. However, the design of the program necessitates that these renters are not customers or ratepayers of PAWC.

¹⁷¹ Id. at 16: 1-8.

1 property in one of the eligible municipalities for the program (a lease would be required), and 4)
2 notify the household if they are enrolled in the program.¹⁷² PAWC is proposing a \$1 million annual
3 cap on RAPP stipends to be recovered through its proposed CAP Rider.¹⁷³

4 PAWC states that it proposes to administer the RAPP in two locations, Scranton and Butler,
5 due to their high renter populations and locations in varying parts of the Commonwealth.¹⁷⁴

6 **Q: Do you have any concerns about PAWC's proposed RAPP?**

7 A: Yes. While I do recognize the benefits of providing assistance to tenants who are not able
8 to enroll in PAWC's programming, I have concerns with the proposed RAPP. First, as discussed
9 in detail above, PAWC's existing low income programming is woefully undersubscribed and not
10 sufficiently effective at mitigating existing high rates for water and wastewater service.
11 Improvements to those programs, as I have recommended throughout my testimony, should take
12 priority over expanding assistance to non-ratepayers. Second, as proposed, this program will
13 benefit both non-ratepayers (tenants) and non-residential ratepayers (multi-family building
14 owners). Despite this, PAWC proposes to fund this Pilot through its CAP rider which, as proposed,
15 will only be charged to residential ratepayers, directly contradicting witness Chard's assertion that
16 it is appropriate to collect the CAP rider only from those ratepayers who would benefit from the
17 programs it funds.¹⁷⁵

18 **Q: What is your recommendation regarding PAWC's proposed RAPP?**

19 A: I recommend that the Commission reject PAWC's proposed RAPP. Until and unless
20 PAWC has provided sufficient funding and has made the necessary structural program and
21 technical modifications to assure affordable rates through appropriate discounts for their

¹⁷² *Id.* at 16: 18-21.

¹⁷³ *Id.* at 17: 15-16.

¹⁷⁴ *Id.* at 16: 11-13; PAWC Response to CAUSE-PA 02-040, attached hereto at Appendix B.

¹⁷⁵ *Id.* at 34: 16-17.

1 ratepayers, I cannot support the introduction of a new program that functionally pays commercial
2 customers.

3 **VIII. SUMMARY OF RECOMMENDATIONS**

4 **Q: Please summarize the recommendations you have made throughout your direct**
5 **testimony.**

6 **A:** In my direct testimony, I have made numerous recommendations to address unaffordability
7 of PAWC's rates for water/wastewater services at both present and proposed rates for low income
8 customers. I recommend that the Commission order the following:

- 9 • Reject PAWC's proposed rate increase in its entirety, including its proposed increase to
10 the fixed service charge.
- 11 • Reject PAWC's proposed deduct adjustment methodology.
- 12 • Implement changes to the BDP structure and discount levels, as I have outlined above.
- 13 • Set target enrollment benchmarks for the BDP, so that enrollment targets are set at 20%
14 per year of PAWC's estimated low income customer counts until the Company reaches at
15 least 75% enrollment of this estimated group.
- 16 • Establish quantitative goals related to affirmative customer outreach for the purpose of
17 enrolling low income customers in the BDP, as outlined above.
- 18 • Ensure that the Company's BDP and AMP are functioning as separate components of one
19 comprehensive program, rather than as two separate offerings.
- 20 • Implement changes to its AMP structure as outlined above, including, eliminating its
21 balance threshold, eliminating its on-time payment requirement for forgiveness,
22 eliminating the co-pay, and adjusting its forgiveness structure.
- 23 • Increase of the maximum Hardship Fund grant to \$750 for water and \$750 for
24 wastewater.
- 25 • Allow income-qualified water and wastewater customers to receive multiple Hardship
26 Fund grants per year, up to the maximum \$750 for water and wastewater, respectively.

- 1 • Develop and submit a comprehensive Universal Service Plan, including a CEOP,
2 concurrent with its next rate case.

- 3 • Screen all new and moving customers for income level and eligibility for assistance at the
4 time their service is established.

- 5 • Develop call scripting and checklists for its Customer Service Representatives (CSRs) to
6 assist in screening customers for eligibility in its low income assistance programs, in line
7 with my above recommendations.

- 8 • Revise PAWC policies, procedures, and training materials to reflect that customers who
9 provide information related to payment troubles, inability to pay, or low income status
10 should be assisted to apply for PAWC's H2O program *before* they are provided with the
11 option to enroll in payment arrangements, as outlined above.

- 12 • Develop and implement a comprehensive conservation and line repair/replacement
13 program available to all customers at or below 250% FPL, as outlined above, no later
14 than 6 months after the final order in this proceeding.

- 15 • Reject PAWC's proposed Renter Assistance Pilot Program

16 **Q: Does that conclude your direct testimony?**

17 A: Yes; however, I reserve the right to submit rebuttal and surrebuttal testimony in response
18 to testimony submitted by other parties in this proceeding.

CAUSE-PA Statement 1, Geller

Exhibit 1, a-d

Water/Wastewater Burden Tables

CAUSE-PA Exhibit 1-a Water/Wastewater Burden Tables
Current Full Tarriff vs. Current BDP

2 Person Household							
	Income	PAWC Monthly (\$) CURRENT	PAWC Annual (\$) CURRENT	Burden (%) CURRENT	PAWC Monthly (\$) H2O CURRENT	PAWC Annual (\$) H2O CURRENT	Burden (%) PAWC H2O CURRENT
1000 Gal.							
50% FPL	\$ 10,820	\$ 82.11	\$ 985.32	9.11%	\$ 12.31	\$ 147.72	1.37%
100% FPL	\$ 21,640	\$ 82.11	\$ 985.32	4.55%	\$ 23.30	\$ 279.60	1.29%
150% FPL	\$ 32,460	\$ 82.11	\$ 985.32	3.04%	\$ 39.18	\$ 470.16	1.45%
200% FPL	\$ 43,280	\$ 82.11	\$ 985.32	2.28%	\$ 56.24	\$ 674.88	1.56%
3000 Gal							
50% FPL	\$ 10,820	\$ 178.73	\$ 2,144.76	19.82%	\$ 28.67	\$ 344.04	3.18%
100% FPL	\$ 21,640	\$ 178.73	\$ 2,144.76	9.91%	\$ 52.40	\$ 628.80	2.91%
150% FPL	\$ 32,460	\$ 178.73	\$ 2,144.76	6.61%	\$ 89.00	\$ 1,068.00	3.29%
200% FPL	\$ 43,280	\$ 178.73	\$ 2,144.76	4.96%	\$ 123.50	\$ 1,482.00	3.42%
6000 Gal							
50% FPL	\$ 10,820	\$ 323.66	\$ 3,883.92	35.90%	\$ 53.21	\$ 638.52	5.90%
100% FPL	\$ 21,640	\$ 323.66	\$ 3,883.92	17.95%	\$ 96.05	\$ 1,152.60	5.33%
150% FPL	\$ 32,460	\$ 323.66	\$ 3,883.92	11.97%	\$ 163.73	\$ 1,964.76	6.05%
200% FPL	\$ 43,280	\$ 323.66	\$ 3,883.92	8.97%	\$ 224.39	\$ 2,692.68	6.22%
8000 Gal							
50% FPL	\$ 10,820	\$ 420.28	\$ 5,043.36	46.61%	\$ 69.57	\$ 834.84	7.72%
100% FPL	\$ 21,640	\$ 420.28	\$ 5,043.36	23.31%	\$ 125.15	\$ 1,501.80	6.94%
150% FPL	\$ 32,460	\$ 420.28	\$ 5,043.36	15.54%	\$ 213.55	\$ 2,562.60	7.89%
200% FPL	\$ 43,280	\$ 420.28	\$ 5,043.36	11.65%	\$ 291.65	\$ 3,499.80	8.09%

3 Person Household							
	Income	PAWC Monthly (\$) CURRENT	PAWC Annual (\$) CURRENT	Burden (%) CURRENT	PAWC Monthly (\$) H2O CURRENT	PAWC Annual (\$) H2O CURRENT	Burden (%) PAWC H2O CURRENT
1000 Gal.							
50% FPL	\$ 13,660	\$ 82.11	\$ 985.32	7.21%	\$ 12.31	\$ 147.72	1.08%
100% FPL	\$ 27,320	\$ 82.11	\$ 985.32	3.61%	\$ 23.30	\$ 279.60	1.02%
150% FPL	\$ 40,980	\$ 82.11	\$ 985.32	2.40%	\$ 39.18	\$ 470.16	1.15%
200% FPL	\$ 54,640	\$ 82.11	\$ 985.32	1.80%	\$ 56.24	\$ 674.88	1.24%
3000 Gal							
50% FPL	\$ 13,660	\$ 178.73	\$ 2,144.76	15.70%	\$ 28.67	\$ 344.04	2.52%
100% FPL	\$ 27,320	\$ 178.73	\$ 2,144.76	7.85%	\$ 52.40	\$ 628.80	2.30%
150% FPL	\$ 40,980	\$ 178.73	\$ 2,144.76	5.23%	\$ 89.00	\$ 1,068.00	2.61%
200% FPL	\$ 54,640	\$ 178.73	\$ 2,144.76	3.93%	\$ 123.50	\$ 1,482.00	2.71%
6000 Gal							
50% FPL	\$ 13,660	\$ 323.66	\$ 3,883.92	28.43%	\$ 53.21	\$ 638.52	4.67%
100% FPL	\$ 27,320	\$ 323.66	\$ 3,883.92	14.22%	\$ 96.05	\$ 1,152.60	4.22%
150% FPL	\$ 40,980	\$ 323.66	\$ 3,883.92	9.48%	\$ 163.73	\$ 1,964.76	4.79%
200% FPL	\$ 54,640	\$ 323.66	\$ 3,883.92	7.11%	\$ 224.39	\$ 2,692.68	4.93%
8000 Gal							
50% FPL	\$ 13,660	\$ 420.28	\$ 5,043.36	36.92%	\$ 69.57	\$ 834.84	6.11%
100% FPL	\$ 27,320	\$ 420.28	\$ 5,043.36	18.46%	\$ 125.15	\$ 1,501.80	5.50%
150% FPL	\$ 40,980	\$ 420.28	\$ 5,043.36	12.31%	\$ 213.55	\$ 2,562.60	6.25%
200% FPL	\$ 54,640	\$ 420.28	\$ 5,043.36	9.23%	\$ 291.65	\$ 3,499.80	6.41%

CAUSE-PA St. 1, Exhibit 1
Water/Wastewater Burden Tables

4 Person Household								
	Income	PAWC Monthly (\$) CURRENT	PAWC Annual (\$) CURRENT	Burden (%) CURRENT	PAWC Monthly (\$) H2O CURRENT	PAWC Annual (\$) H2O CURRENT	Burden (%) H2O CURRENT	PAWC H2O CURRENT
1000 Gal.								
50% FPL	\$ 16,500	\$ 82.11	\$ 985.32	5.97%	\$ 12.31	\$ 147.72	0.90%	
100% FPL	\$ 33,000	\$ 82.11	\$ 985.32	2.99%	\$ 23.30	\$ 279.60	0.85%	
150% FPL	\$ 49,500	\$ 82.11	\$ 985.32	1.99%	\$ 39.18	\$ 470.16	0.95%	
200% FPL	\$ 66,000	\$ 82.11	\$ 985.32	1.49%	\$ 56.24	\$ 674.88	1.02%	
3000 Gal								
50% FPL	\$ 16,500	\$ 178.73	\$ 2,144.76	13.00%	\$ 28.67	\$ 344.04	2.09%	
100% FPL	\$ 33,000	\$ 178.73	\$ 2,144.76	6.50%	\$ 52.40	\$ 628.80	1.91%	
150% FPL	\$ 49,500	\$ 178.73	\$ 2,144.76	4.33%	\$ 89.00	\$ 1,068.00	2.16%	
200% FPL	\$ 66,000	\$ 178.73	\$ 2,144.76	3.25%	\$ 123.50	\$ 1,482.00	2.25%	
6000 Gal								
50% FPL	\$ 16,500	\$ 323.66	\$ 3,883.92	23.54%	\$ 53.21	\$ 638.52	3.87%	
100% FPL	\$ 33,000	\$ 323.66	\$ 3,883.92	11.77%	\$ 96.05	\$ 1,152.60	3.49%	
150% FPL	\$ 49,500	\$ 323.66	\$ 3,883.92	7.85%	\$ 163.73	\$ 1,964.76	3.97%	
200% FPL	\$ 66,000	\$ 323.66	\$ 3,883.92	5.88%	\$ 224.39	\$ 2,692.68	4.08%	
8000 Gal								
50% FPL	\$ 16,500	\$ 420.28	\$ 5,043.36	30.57%	\$ 69.57	\$ 834.84	5.06%	
100% FPL	\$ 33,000	\$ 420.28	\$ 5,043.36	15.28%	\$ 125.15	\$ 1,501.80	4.55%	
150% FPL	\$ 49,500	\$ 420.28	\$ 5,043.36	10.19%	\$ 213.55	\$ 2,562.60	5.18%	
200% FPL	\$ 66,000	\$ 420.28	\$ 5,043.36	7.64%	\$ 291.65	\$ 3,499.80	5.30%	

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2026 federal poverty guidelines.

See HHS Poverty Guidelines for 2026, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

CAUSE-PA Exhibit 1-b Water/Wastewater Burden Tables
Proposed Full Tariff vs. PAWC Proposed BDP

2 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) 2026	PAWC Annual Proposed (\$) 2026	Burden (%) PAWC 2026	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026
1000 Gal.							
50% FPL	\$ 10,820	\$ 94.52	\$ 1,134.24	10.48%	\$ 17.00	\$ 204.00	1.89%
100% FPL	\$ 21,640	\$ 94.52	\$ 1,134.24	5.24%	\$ 31.17	\$ 374.04	1.73%
150% FPL	\$ 32,460	\$ 94.52	\$ 1,134.24	3.49%	\$ 52.90	\$ 634.80	1.96%
200% FPL	\$ 43,280	\$ 94.52	\$ 1,134.24	2.62%	\$ 73.67	\$ 884.04	2.04%
3000 Gal							
50% FPL	\$ 10,820	\$ 203.56	\$ 2,442.72	22.58%	\$ 36.60	\$ 439.20	4.06%
100% FPL	\$ 21,640	\$ 203.56	\$ 2,442.72	11.29%	\$ 67.11	\$ 805.32	3.72%
150% FPL	\$ 32,460	\$ 203.56	\$ 2,442.72	7.53%	\$ 113.90	\$ 1,366.80	4.21%
200% FPL	\$ 43,280	\$ 203.56	\$ 2,442.72	5.64%	\$ 158.61	\$ 1,903.32	4.40%
6000 Gal							
50% FPL	\$ 10,820	\$ 367.12	\$ 4,405.44	40.72%	\$ 66.00	\$ 792.00	7.32%
100% FPL	\$ 21,640	\$ 367.12	\$ 4,405.44	20.36%	\$ 121.02	\$ 1,452.24	6.71%
150% FPL	\$ 32,460	\$ 367.12	\$ 4,405.44	13.57%	\$ 205.40	\$ 2,464.80	7.59%
200% FPL	\$ 43,280	\$ 367.12	\$ 4,405.44	10.18%	\$ 286.02	\$ 3,432.24	7.93%
8000 Gal							
50% FPL	\$ 10,820	\$ 476.16	\$ 5,713.92	52.81%	\$ 85.60	\$ 1,027.20	9.49%
100% FPL	\$ 21,640	\$ 476.16	\$ 5,713.92	26.40%	\$ 156.96	\$ 1,883.52	8.70%
150% FPL	\$ 32,460	\$ 476.16	\$ 5,713.92	17.60%	\$ 266.40	\$ 3,196.80	9.85%
200% FPL	\$ 43,280	\$ 476.16	\$ 5,713.92	13.20%	\$ 370.96	\$ 4,451.52	10.29%

3 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) 2026	PAWC Annual Proposed (\$) 2026	Burden (%) PAWC 2026	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026
1000 Gal.							
50% FPL	\$ 13,660	\$ 94.52	\$ 1,134.24	8.30%	\$ 17.00	\$ 204.00	1.49%
100% FPL	\$ 27,320	\$ 94.52	\$ 1,134.24	4.15%	\$ 31.17	\$ 374.04	1.37%
150% FPL	\$ 40,980	\$ 94.52	\$ 1,134.24	2.77%	\$ 52.90	\$ 634.80	1.55%
200% FPL	\$ 54,640	\$ 94.52	\$ 1,134.24	2.08%	\$ 73.67	\$ 884.04	1.62%
3000 Gal							
50% FPL	\$ 13,660	\$ 203.56	\$ 2,442.72	17.88%	\$ 36.60	\$ 439.20	3.22%
100% FPL	\$ 27,320	\$ 203.56	\$ 2,442.72	8.94%	\$ 67.11	\$ 805.32	2.95%
150% FPL	\$ 40,980	\$ 203.56	\$ 2,442.72	5.96%	\$ 113.90	\$ 1,366.80	3.34%
200% FPL	\$ 54,640	\$ 203.56	\$ 2,442.72	4.47%	\$ 158.61	\$ 1,903.32	3.48%
6000 Gal							
50% FPL	\$ 13,660	\$ 367.12	\$ 4,405.44	32.25%	\$ 66.00	\$ 792.00	5.80%
100% FPL	\$ 27,320	\$ 367.12	\$ 4,405.44	16.13%	\$ 121.02	\$ 1,452.24	5.32%
150% FPL	\$ 40,980	\$ 367.12	\$ 4,405.44	10.75%	\$ 205.40	\$ 2,464.80	6.01%
200% FPL	\$ 54,640	\$ 367.12	\$ 4,405.44	8.06%	\$ 286.02	\$ 3,432.24	6.28%
8000 Gal							
50% FPL	\$ 13,660	\$ 476.16	\$ 5,713.92	41.83%	\$ 85.60	\$ 1,027.20	7.52%
100% FPL	\$ 27,320	\$ 476.16	\$ 5,713.92	20.91%	\$ 156.96	\$ 1,883.52	6.89%
150% FPL	\$ 40,980	\$ 476.16	\$ 5,713.92	13.94%	\$ 266.40	\$ 3,196.80	7.80%
200% FPL	\$ 54,640	\$ 476.16	\$ 5,713.92	10.46%	\$ 370.96	\$ 4,451.52	8.15%

CAUSE-PA St. 1, Exhibit 1
Water/Wastewater Burden Tables

4 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) 2026	PAWC Annual Proposed (\$) 2026	Burden (%) PAWC 2026	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026
1000 Gal.							
50% FPL	\$ 16,500	\$ 94.52	\$ 1,134.24	6.87%	\$ 17.00	\$ 204.00	1.24%
100% FPL	\$ 33,000	\$ 94.52	\$ 1,134.24	3.44%	\$ 31.17	\$ 374.04	1.13%
150% FPL	\$ 49,500	\$ 94.52	\$ 1,134.24	2.29%	\$ 52.90	\$ 634.80	1.28%
200% FPL	\$ 66,000	\$ 94.52	\$ 1,134.24	1.72%	\$ 73.67	\$ 884.04	1.34%
3000 Gal							
50% FPL	\$ 16,500	\$ 203.56	\$ 2,442.72	14.80%	\$ 36.60	\$ 439.20	2.66%
100% FPL	\$ 33,000	\$ 203.56	\$ 2,442.72	7.40%	\$ 67.11	\$ 805.32	2.44%
150% FPL	\$ 49,500	\$ 203.56	\$ 2,442.72	4.93%	\$ 113.90	\$ 1,366.80	2.76%
200% FPL	\$ 66,000	\$ 203.56	\$ 2,442.72	3.70%	\$ 158.61	\$ 1,903.32	2.88%
6000 Gal							
50% FPL	\$ 16,500	\$ 367.12	\$ 4,405.44	26.70%	\$ 66.00	\$ 792.00	4.80%
100% FPL	\$ 33,000	\$ 367.12	\$ 4,405.44	13.35%	\$ 121.02	\$ 1,452.24	4.40%
150% FPL	\$ 49,500	\$ 367.12	\$ 4,405.44	8.90%	\$ 205.40	\$ 2,464.80	4.98%
200% FPL	\$ 66,000	\$ 367.12	\$ 4,405.44	6.67%	\$ 286.02	\$ 3,432.24	5.20%
8000 Gal							
50% FPL	\$ 16,500	\$ 476.16	\$ 5,713.92	34.63%	\$ 85.60	\$ 1,027.20	6.23%
100% FPL	\$ 33,000	\$ 476.16	\$ 5,713.92	17.31%	\$ 156.96	\$ 1,883.52	5.71%
150% FPL	\$ 49,500	\$ 476.16	\$ 5,713.92	11.54%	\$ 266.40	\$ 3,196.80	6.46%
200% FPL	\$ 66,000	\$ 476.16	\$ 5,713.92	8.66%	\$ 370.96	\$ 4,451.52	6.74%

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2026 federal poverty guidelines.

See HHS Poverty Guidelines for 2026, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

CAUSE-PA Exhibit 1-c Water/Wastewater Burden Tables
Current H2O at Current Rates vs. Proposed H2O at Current Rates

2 Person Household							
	Income	PAWC Monthly (\$) CURRENT H2O	PAWC Annual (\$) CURRENT H2O	Burden (%) CURRENT H2O	PAWC Monthly (\$) PROPOSED H2O	PAWC Annual (\$) PROPOSED H2O	Burden (%) PAWC PROPOSED H2O
1000 Gal.							
50% FPL	\$ 10,820	\$ 12.31	\$ 147.72	1.37%	\$ 14.78	\$ 177.36	1.64%
100% FPL	\$ 21,640	\$ 23.30	\$ 279.60	1.29%	\$ 27.10	\$ 325.20	1.50%
150% FPL	\$ 32,460	\$ 39.18	\$ 470.16	1.45%	\$ 45.98	\$ 551.76	1.70%
200% FPL	\$ 43,280	\$ 56.24	\$ 674.88	1.56%	\$ 64.04	\$ 768.48	1.78%
3000 Gal							
50% FPL	\$ 10,820	\$ 28.67	\$ 344.04	3.18%	\$ 32.18	\$ 386.16	3.57%
100% FPL	\$ 21,640	\$ 52.40	\$ 628.80	2.91%	\$ 58.97	\$ 707.64	3.27%
150% FPL	\$ 32,460	\$ 89.00	\$ 1,068.00	3.29%	\$ 100.08	\$ 1,200.96	3.70%
200% FPL	\$ 43,280	\$ 123.50	\$ 1,482.00	3.42%	\$ 139.40	\$ 1,672.80	3.87%
6000 Gal							
50% FPL	\$ 10,820	\$ 53.21	\$ 638.52	5.90%	\$ 58.28	\$ 699.36	6.46%
100% FPL	\$ 21,640	\$ 96.05	\$ 1,152.60	5.33%	\$ 106.79	\$ 1,281.48	5.92%
150% FPL	\$ 32,460	\$ 163.73	\$ 1,964.76	6.05%	\$ 181.23	\$ 2,174.76	6.70%
200% FPL	\$ 43,280	\$ 224.39	\$ 2,692.68	6.22%	\$ 252.44	\$ 3,029.28	7.00%
8000 Gal							
50% FPL	\$ 10,820	\$ 69.57	\$ 834.84	7.72%	\$ 75.68	\$ 908.16	8.39%
100% FPL	\$ 21,640	\$ 125.15	\$ 1,501.80	6.94%	\$ 138.67	\$ 1,664.04	7.69%
150% FPL	\$ 32,460	\$ 213.55	\$ 2,562.60	7.89%	\$ 235.33	\$ 2,823.96	8.70%
200% FPL	\$ 43,280	\$ 291.65	\$ 3,499.80	8.09%	\$ 327.80	\$ 3,933.60	9.09%

3 Person Household							
	Income	PAWC Monthly (\$) CURRENT H2O	PAWC Annual (\$) CURRENT H2O	Burden (%) CURRENT H2O	PAWC Monthly (\$) PROPOSED H2O	PAWC Annual (\$) PROPOSED H2O	Burden (%) PAWC PROPOSED H2O
1000 Gal.							
50% FPL	\$ 13,660	\$ 12.31	\$ 147.72	1.08%	\$ 14.78	\$ 177.36	1.30%
100% FPL	\$ 27,320	\$ 23.30	\$ 279.60	1.02%	\$ 27.10	\$ 325.20	1.19%
150% FPL	\$ 40,980	\$ 39.18	\$ 470.16	1.15%	\$ 45.98	\$ 551.76	1.35%
200% FPL	\$ 54,640	\$ 56.24	\$ 674.88	1.24%	\$ 64.04	\$ 768.48	1.41%
3000 Gal							
50% FPL	\$ 13,660	\$ 28.67	\$ 344.04	2.52%	\$ 32.18	\$ 386.16	2.83%
100% FPL	\$ 27,320	\$ 52.40	\$ 628.80	2.30%	\$ 58.97	\$ 707.64	2.59%
150% FPL	\$ 40,980	\$ 89.00	\$ 1,068.00	2.61%	\$ 100.08	\$ 1,200.96	2.93%
200% FPL	\$ 54,640	\$ 123.50	\$ 1,482.00	2.71%	\$ 139.40	\$ 1,672.80	3.06%
6000 Gal							
50% FPL	\$ 13,660	\$ 53.21	\$ 638.52	4.67%	\$ 58.28	\$ 699.36	5.12%
100% FPL	\$ 27,320	\$ 96.05	\$ 1,152.60	4.22%	\$ 106.79	\$ 1,281.48	4.69%
150% FPL	\$ 40,980	\$ 163.73	\$ 1,964.76	4.79%	\$ 181.23	\$ 2,174.76	5.31%
200% FPL	\$ 54,640	\$ 224.39	\$ 2,692.68	4.93%	\$ 252.44	\$ 3,029.28	5.54%
8000 Gal							
50% FPL	\$ 13,660	\$ 69.57	\$ 834.84	6.11%	\$ 75.68	\$ 908.16	6.65%
100% FPL	\$ 27,320	\$ 125.15	\$ 1,501.80	5.50%	\$ 138.67	\$ 1,664.04	6.09%
150% FPL	\$ 40,980	\$ 213.55	\$ 2,562.60	6.25%	\$ 235.33	\$ 2,823.96	6.89%
200% FPL	\$ 54,640	\$ 291.65	\$ 3,499.80	6.41%	\$ 327.80	\$ 3,933.60	7.20%

CAUSE-PA St. 1, Exhibit 1
Water/Wastewater Burden Tables

4 Person Household							
	Income	PAWC Monthly (\$) CURRENT H2O	PAWC Annual (\$) CURRENT H2O	Burden (%) CURRENT H2O	PAWC Monthly (\$) PROPOSED H2O	PAWC Annual (\$) PROPOSED H2O	Burden (%) PAWC PROPOSED H2O
1000 Gal.							
50% FPL	\$ 16,500	\$ 12.31	\$ 147.72	0.90%	\$ 14.78	\$ 177.36	1.07%
100% FPL	\$ 33,000	\$ 23.30	\$ 279.60	0.85%	\$ 27.10	\$ 325.20	0.99%
150% FPL	\$ 49,500	\$ 39.18	\$ 470.16	0.95%	\$ 45.98	\$ 551.76	1.11%
200% FPL	\$ 66,000	\$ 56.24	\$ 674.88	1.02%	\$ 64.04	\$ 768.48	1.16%
3000 Gal							
50% FPL	\$ 16,500	\$ 28.67	\$ 344.04	2.09%	\$ 32.18	\$ 386.16	2.34%
100% FPL	\$ 33,000	\$ 52.40	\$ 628.80	1.91%	\$ 58.97	\$ 707.64	2.14%
150% FPL	\$ 49,500	\$ 89.00	\$ 1,068.00	2.16%	\$ 100.08	\$ 1,200.96	2.43%
200% FPL	\$ 66,000	\$ 123.50	\$ 1,482.00	2.25%	\$ 139.40	\$ 1,672.80	2.53%
6000 Gal							
50% FPL	\$ 16,500	\$ 53.21	\$ 638.52	3.87%	\$ 58.28	\$ 699.36	4.24%
100% FPL	\$ 33,000	\$ 96.05	\$ 1,152.60	3.49%	\$ 106.79	\$ 1,281.48	3.88%
150% FPL	\$ 49,500	\$ 163.73	\$ 1,964.76	3.97%	\$ 181.23	\$ 2,174.76	4.39%
200% FPL	\$ 66,000	\$ 224.39	\$ 2,692.68	4.08%	\$ 252.44	\$ 3,029.28	4.59%
8000 Gal							
50% FPL	\$ 16,500	\$ 69.57	\$ 834.84	5.06%	\$ 75.68	\$ 908.16	5.50%
100% FPL	\$ 33,000	\$ 125.15	\$ 1,501.80	4.55%	\$ 138.67	\$ 1,664.04	5.04%
150% FPL	\$ 49,500	\$ 213.55	\$ 2,562.60	5.18%	\$ 235.33	\$ 2,823.96	5.70%
200% FPL	\$ 66,000	\$ 291.65	\$ 3,499.80	5.30%	\$ 327.80	\$ 3,933.60	5.96%

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2026 federal poverty guidelines.

See HHS Poverty Guidelines for 2026, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

CAUSE-PA Exhibit 1-d Water/Wastewater Burden Tables
PAWC Proposed BDP vs. CAUSE-PA Proposed BDP

2 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026	CAUSE-PA Proposed Monthly (\$) H2O 2026	CAUSE-PA Proposed Annual (\$) H2O 2026	Burden (%) CAUSE-PA H2O 2026
1000 Gal.							
50% FPL	\$ 10,820	\$ 17.00	\$ 204.00	1.89%	\$ 8.18	\$ 98.16	0.91%
100% FPL	\$ 21,640	\$ 31.17	\$ 374.04	1.73%	\$ 13.63	\$ 163.56	0.76%
150% FPL	\$ 32,460	\$ 52.90	\$ 634.80	1.96%	\$ 27.27	\$ 327.24	1.01%
200% FPL	\$ 43,280	\$ 73.67	\$ 884.04	2.04%	\$ 40.89	\$ 490.68	1.13%
3000 Gal							
50% FPL	\$ 10,820	\$ 36.60	\$ 439.20	4.06%	\$ 24.54	\$ 294.48	2.72%
100% FPL	\$ 21,640	\$ 67.11	\$ 805.32	3.72%	\$ 40.89	\$ 490.68	2.27%
150% FPL	\$ 32,460	\$ 113.90	\$ 1,366.80	4.21%	\$ 81.81	\$ 981.72	3.02%
200% FPL	\$ 43,280	\$ 158.61	\$ 1,903.32	4.40%	\$ 122.67	\$ 1,472.04	3.40%
6000 Gal							
50% FPL	\$ 10,820	\$ 66.00	\$ 792.00	7.32%	\$ 49.08	\$ 588.96	5.44%
100% FPL	\$ 21,640	\$ 121.02	\$ 1,452.24	6.71%	\$ 81.78	\$ 981.36	4.53%
150% FPL	\$ 32,460	\$ 205.40	\$ 2,464.80	7.59%	\$ 163.62	\$ 1,963.44	6.05%
200% FPL	\$ 43,280	\$ 286.02	\$ 3,432.24	7.93%	\$ 245.34	\$ 2,944.08	6.80%
8000 Gal							
50% FPL	\$ 10,820	\$ 85.60	\$ 1,027.20	9.49%	\$ 65.44	\$ 785.28	7.26%
100% FPL	\$ 21,640	\$ 156.96	\$ 1,883.52	8.70%	\$ 109.04	\$ 1,308.48	6.05%
150% FPL	\$ 32,460	\$ 266.40	\$ 3,196.80	9.85%	\$ 218.16	\$ 2,617.92	8.07%
200% FPL	\$ 43,280	\$ 370.96	\$ 4,451.52	10.29%	\$ 327.12	\$ 3,925.44	9.07%

3 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026	CAUSE-PA Proposed Monthly (\$) H2O 2026	CAUSE-PA Proposed Annual (\$) H2O 2026	Burden (%) CAUSE-PA H2O 2026
1000 Gal.							
50% FPL	\$ 13,660	\$ 17.00	\$ 204.00	1.49%	\$ 8.18	\$ 98.16	0.72%
100% FPL	\$ 27,320	\$ 31.17	\$ 374.04	1.37%	\$ 13.63	\$ 163.56	0.60%
150% FPL	\$ 40,980	\$ 52.90	\$ 634.80	1.55%	\$ 27.27	\$ 327.24	0.80%
200% FPL	\$ 54,640	\$ 73.67	\$ 884.04	1.62%	\$ 40.89	\$ 490.68	0.90%
3000 Gal							
50% FPL	\$ 13,660	\$ 36.60	\$ 439.20	3.22%	\$ 24.54	\$ 294.48	2.16%
100% FPL	\$ 27,320	\$ 67.11	\$ 805.32	2.95%	\$ 40.89	\$ 490.68	1.80%
150% FPL	\$ 40,980	\$ 113.90	\$ 1,366.80	3.34%	\$ 81.81	\$ 981.72	2.40%
200% FPL	\$ 54,640	\$ 158.61	\$ 1,903.32	3.48%	\$ 122.67	\$ 1,472.04	2.69%
6000 Gal							
50% FPL	\$ 13,660	\$ 66.00	\$ 792.00	5.80%	\$ 49.08	\$ 588.96	4.31%
100% FPL	\$ 27,320	\$ 121.02	\$ 1,452.24	5.32%	\$ 81.78	\$ 981.36	3.59%
150% FPL	\$ 40,980	\$ 205.40	\$ 2,464.80	6.01%	\$ 163.62	\$ 1,963.44	4.79%
200% FPL	\$ 54,640	\$ 286.02	\$ 3,432.24	6.28%	\$ 245.34	\$ 2,944.08	5.39%
8000 Gal							
50% FPL	\$ 13,660	\$ 85.60	\$ 1,027.20	7.52%	\$ 65.44	\$ 785.28	5.75%
100% FPL	\$ 27,320	\$ 156.96	\$ 1,883.52	6.89%	\$ 109.04	\$ 1,308.48	4.79%
150% FPL	\$ 40,980	\$ 266.40	\$ 3,196.80	7.80%	\$ 218.16	\$ 2,617.92	6.39%
200% FPL	\$ 54,640	\$ 370.96	\$ 4,451.52	8.15%	\$ 327.12	\$ 3,925.44	7.18%

4 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026	CAUSE-PA Proposed Monthly (\$) H2O 2026	CAUSE-PA Proposed Annual (\$) H2O 2026	Burden (%) CAUSE-PA H2O 2026
1000 Gal.							
50% FPL	\$ 16,500	\$ 17.00	\$ 204.00	1.24%	\$ 8.18	\$ 98.16	0.59%
100% FPL	\$ 33,000	\$ 31.17	\$ 374.04	1.13%	\$ 13.63	\$ 163.56	0.50%
150% FPL	\$ 49,500	\$ 52.90	\$ 634.80	1.28%	\$ 27.27	\$ 327.24	0.66%
200% FPL	\$ 66,000	\$ 73.67	\$ 884.04	1.34%	\$ 40.89	\$ 490.68	0.74%
3000 Gal							
50% FPL	\$ 16,500	\$ 36.60	\$ 439.20	2.66%	\$ 24.54	\$ 294.48	1.78%
100% FPL	\$ 33,000	\$ 67.11	\$ 805.32	2.44%	\$ 40.89	\$ 490.68	1.49%
150% FPL	\$ 49,500	\$ 113.90	\$ 1,366.80	2.76%	\$ 81.81	\$ 981.72	1.98%
200% FPL	\$ 66,000	\$ 158.61	\$ 1,903.32	2.88%	\$ 122.67	\$ 1,472.04	2.23%
6000 Gal							
50% FPL	\$ 16,500	\$ 66.00	\$ 792.00	4.80%	\$ 49.08	\$ 588.96	3.57%
100% FPL	\$ 33,000	\$ 121.02	\$ 1,452.24	4.40%	\$ 81.78	\$ 981.36	2.97%
150% FPL	\$ 49,500	\$ 205.40	\$ 2,464.80	4.98%	\$ 163.62	\$ 1,963.44	3.97%
200% FPL	\$ 66,000	\$ 286.02	\$ 3,432.24	5.20%	\$ 245.34	\$ 2,944.08	4.46%
8000 Gal							
50% FPL	\$ 16,500	\$ 85.60	\$ 1,027.20	6.23%	\$ 65.44	\$ 785.28	4.76%
100% FPL	\$ 33,000	\$ 156.96	\$ 1,883.52	5.71%	\$ 109.04	\$ 1,308.48	3.97%
150% FPL	\$ 49,500	\$ 266.40	\$ 3,196.80	6.46%	\$ 218.16	\$ 2,617.92	5.29%
200% FPL	\$ 66,000	\$ 370.96	\$ 4,451.52	6.74%	\$ 327.12	\$ 3,925.44	5.95%

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2026 federal poverty guidelines.

See HHS Poverty Guidelines for 2026, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

CAUSE-PA Statement 1, Geller

Exhibit 2

Self- Sufficiency Standard Income Comparisons by County

County	Annual Self-Sufficiency Wage	Difference Ave.	Difference Ave. CLI	200% FPL
		H2O Income \$21,351	\$11,387	\$66,000 (Family of 4)
Clarion County	\$71,584.88	\$50,234	\$60,198	\$5,585
Clinton County	\$71,648.23	\$50,297	\$60,261	\$5,648
Jefferson County	\$72,235.13	\$50,884	\$60,848	\$6,235
Clearfield County	\$72,669.41	\$51,318	\$61,282	\$6,669
McKean County	\$72,673.54	\$51,323	\$61,287	\$6,674
Warren County	\$73,920.59	\$52,570	\$62,534	\$7,921
Wayne County	\$77,241.59	\$55,891	\$65,855	\$11,242
Susquehanna County	\$77,575.70	\$56,225	\$66,189	\$11,576
Fayette County	\$77,688.54	\$56,338	\$66,302	\$11,689
Wyoming County	\$77,814.11	\$56,463	\$66,427	\$11,814
Northumberland County	\$78,350.87	\$57,000	\$66,964	\$12,351
Greene County	\$78,932.06	\$57,581	\$67,545	\$12,932
Schuylkill County	\$79,440.95	\$58,090	\$68,054	\$13,441
Union County	\$81,017.10	\$59,666	\$69,630	\$15,017
Lackawanna County	\$81,592.32	\$60,241	\$70,205	\$15,592
Allegheny County	\$81,593.62	\$60,243	\$70,207	\$15,594
Luzerne County	\$81,854.93	\$60,504	\$70,468	\$15,855
Lawrence County	\$81,968.40	\$60,617	\$70,581	\$15,968
Armstrong County	\$82,695.54	\$61,345	\$71,309	\$16,696
Washington County	\$82,719.30	\$61,368	\$71,332	\$16,719
Indiana County	\$82,740.11	\$61,389	\$71,353	\$16,740
Beaver County	\$84,410.25	\$63,059	\$73,023	\$18,410
Columbia County	\$84,513.07	\$63,162	\$73,126	\$18,513
Monroe County	\$86,793.89	\$65,443	\$75,407	\$20,794
York County	\$88,161.54	\$66,811	\$76,775	\$22,162
Lebanon County	\$88,300.31	\$66,949	\$76,913	\$22,300
Butler County	\$88,547.15	\$67,196	\$77,160	\$22,547
Adams County	\$88,858.46	\$67,507	\$77,471	\$22,858
Lancaster County	\$89,082.74	\$67,732	\$77,696	\$23,083
Cumberland County	\$90,117.39	\$68,766	\$78,730	\$24,117
Dauphin County	\$90,143.51	\$68,793	\$78,757	\$24,144
Berks County	\$90,375.06	\$69,024	\$78,988	\$24,375
Centre County	\$90,382.61	\$69,032	\$78,996	\$24,383
Pike County	\$90,541.20	\$69,190	\$79,154	\$24,541
Northampton County	\$92,212.42	\$70,861	\$80,825	\$26,212
Montgomery County	\$103,484.40	\$82,133	\$92,097	\$37,484
Chester County	\$104,491.14	\$83,140	\$93,104	\$38,491
Bucks County	\$104,761.80	\$83,411	\$93,375	\$38,762

CAUSE-PA St. 1, Geller

Appendix A

Resume – Harry S. Geller, Esq.

RESUME OF HARRY S. GELLER

EDUCATIONAL BACKGROUND:

Harpur College, State University of New York at Binghamton, B.A. 1966

Washington College of Law, American University, J.D. 1969

New York University Law School, courses in Urban Affairs and Poverty Law, as part of
Volunteers in Service to America (VISTA) Program 1969-1971

EMPLOYMENT:

1988- 2015 Executive Director, Pennsylvania Utility Law Project (PULP), a project of the civil non-profit Pennsylvania Legal Aid Network. PULP is dedicated to providing technical support, information sharing, and representation to low-income individuals and organizations, assisting and advocating for the low income in utility and energy matters. Responsibilities include project oversight, case consultation, co-counseling, and participation on task forces, work groups and advisory panels, community education and training in utility and energy matters affecting the low income.

While at PULP, served in the following capacities:

- Chairman, Low-Income Home Energy Assistance Program (LIHEAP) Advisory Committee to the Secretary, Pennsylvania Department of Human Services
- Member, Pennsylvania Public Utility Commission, Consumer Advisory Council Coordinator, Pennsylvania Legal Services Utility/Energy Work Groups
- Member, Weatherization Policy Advisory Committee to the Department of Community and Economic Development
- Member, PECO Universal Service Advisory Committee and LIURP Subcommittee

1974-1987 Staff Attorney, Managing Attorney and ultimately, Executive Director of Legal Services, Incorporated (LSI), a civil legal services program serving Adams, Cumberland, Franklin and Fulton Counties. Through a restructuring with other legal services programs, LSI became part of what is now known as MidPenn Legal Services and Franklin County Legal Services.

1971-1972 Staff Attorney, New York City Legal Aid Society, Criminal Court and Supreme Court Branches, New York County.

1969-1971 Volunteer in Service to America (VISTA) assigned to the New York University Law School Project on Urban Affairs and Poverty Law.

BAR ADMISSIONS - Retired

New York State

Commonwealth of Pennsylvania

United States District Court, Middle District of Pennsylvania

**Cases in which Harry S. Geller has participated as a witness
before the Pennsylvania Public Utility Commission
since July 1, 2015**

Pennsylvania Public Utility Commission v. Columbia Gas of Pa., Docket No. R-2025-3053499
Pennsylvania Public Utility Commission v. UGI Utilities, Inc. - Gas Division, Docket No. R-2024-305276
Pennsylvania Public Utility Commission v. Aqua Pennsylvania Inc., Aqua Pennsylvania Wastewater, Inc., Docket Nos. R-2024-3047822; R-2024-3047824.
Pennsylvania Public Utility Commission v. FirstEnergy Pennsylvania Electric Company, Docket No. R-2024-3047068
Pennsylvania Public Utility Commission v. Duquesne Light Company, Docket No. R-2024-3046523
Petition of PPL Electric Utilities Corp. for Approval of DSP for Period of June 1, 2025 through May 31, 2029, Docket No. P-2024-3047290
Pennsylvania Public Utility Commission v. Peoples Natural Gas Company, LLC, Docket No. R-2023-3044549
Pennsylvania Public Utility Commission v. PGW, Docket No. R-2023-3037933.
Pennsylvania Public Utility Commission v. PWSA, Docket Nos. R-2023-3039920; R-2023-3039921; R-2023-3039919
Pennsylvania Public Utility Commission v. PAWC, Docket Nos. R-2023-3043189; R-2023-3043190
Pennsylvania Public Utility Commission v. Peoples Natural Gas Co. LLC, Docket No. R-2023-3044549
Petition of PPL Electric Utilities Corp. for Approval of DSP for Period of June 1, 2025 through May 31, 2029, Docket No. P-2024-3047290
Pennsylvania Public Utility Commission v. Philadelphia Gas Works, R-2022-3034229, P-2022-3034264
Pennsylvania Public Utility Commission v. National Fuel Gas Distribution Corporation, R-2022-3035730
Pennsylvania Public Utility Commission v. Columbia Gas of Pa., Docket No. R-2022-3031211
Pennsylvania Public Utility Commission v. Pa. American Water Co., Docket Nos. R-2022-3031672 & -3031673
Pennsylvania Public Utility Commission v. UGI Utilities, Inc.-Gas Division, R-2021- 3030218.
Joint Petition of MetEd, Penelec, Penn Power, and West Penn Power for Approval of their Default Service Programs for the Period Commencing June 1, 2023 through May 31, 2027, Docket Nos. P-2021-3030012, -13, -14, -21
Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc., Docket Nos. R-2021-3027385, R- 2021-3027386.

Pennsylvania Public Utility Commission v. Pittsburgh Water and Sewer Authority, R-2021-3024773, R-2021-3024774, R-2021-3024779.
Pennsylvania Public Utility Commission v. Duquesne Light Company, R-2021- 3024750.
Pennsylvania Public Utility Commission v. PECO Energy-Electric Division, R-2021-3024601.
Pennsylvania Public Utility Commission v. Columbia Gas of Pennsylvania, Inc., R-2021-3024296.
Tenant Union Representative Network v. PECO Energy Company, C-2020-3021557
Pennsylvania Public Utility Commission v. Philadelphia Gas Works, R-2020-3017206.
Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program for the Period of June 1, 2021 through May 31, 2025, Docket No. P-2020-3019356.
Petition of PECO Energy Company for Approval of Its Default Service Program for the Period from June 1, 2021 through May 31, 2025, Docket No. P-2020-3019290.
Petition of Duquesne Light Company For Approval of Default Service Plan For The Period June 1, 2021 Through May 31, 2025, Docket No. P-2020-3019522.
Joint Application of Aqua America, Inc., Aqua Pennsylvania, Inc., Aqua Pennsylvania Wastewater, Inc., Peoples Natural Gas Company LLC and Peoples Gas Company LLC for all of the Authority and Necessary Certificates of Public Convenience to Approve a Change in Control of Peoples Natural Gas Company LLC, and Peoples Gas Company LLC by way of the Purchase of all of LDC Funding LLC's Membership Interests by Aqua America, Inc., Docket Nos. A-2018-3006061, A-2018-3006062, A-2018-3006063.
Pennsylvania Public Utility Commission v. Aqua Pennsylvania, Inc. et al. Docket Nos. R-2018-3003558 et seq.
Pennsylvania Public Utility Commission v. Duquesne Light Company, Docket No. R-2018-3000124.
Pennsylvania Public Utility Commission v. PECO Energy Company- Electric Division, Docket No. R-2018-3000164.
Joint Petition of MetEd, Penelec, Penn Power, and West Penn Power for Approval of their Default Service Programs for the period commencing June 1, 2019 through May 31, 2023, Docket Nos. P-2017-2637855, P-2017-2637857, P-2017-2637858; P-2017-2637866.
Pennsylvania Public Utility Commission et al. v. Philadelphia Gas Works, Docket No. R-2017-2586783.
PECO Energy Company's Pilot Plan for an Advance Payments Program and Petition for Temporary Waiver of Portions of the Commission's Regulations with Respect to that Plan, Docket No. P-2016-2573023.
Petition of PECO Energy Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2019, Docket No. P-2016-2534980.
Petition of PPL Electric Utilities Corporation for Approval of a Default Service Program and Procurement Plan for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2526627.
Petition of Duquesne Light Company for Approval of a Default Service Program for the Period of June 1, 2017 through May 31, 2021, Docket No. P-2016-2543140.

Pennsylvania Public Utility Commission et al. v. Columbia Gas of Pennsylvania, Inc., Docket No. R-2016-2529660.

Joint Petition of Metropolitan Edison Company, Pennsylvania Electric Company, Pennsylvania Power Company, and West Penn Power Company for Approval of their Default Service Programs for the period commencing June 1, 2017 through May 31, 2019, Docket Nos. P-2015-2511333, P-2015-25113351, P-2015-2511355, P-2015-2511356.

Petition of PPL Electric Utilities Corporation for Approval of its Energy Efficiency and Conservation Plan, Docket No. M-2015-2515642.

CAUSE-PA Statement 1, Geller

Appendix B

Interrogatories of CAUSE-PA to PAWC

PAWC Response to CAUSE-PA 01-002, Attachment
PAWC Response to CAUSE-PA 01-003
PAWC Response to CAUSE-PA 01-004, Attachment
PAWC Response to CAUSE-PA 01-005
PAWC Response to CAUSE-PA 01-006
PAWC Response to CAUSE-PA 01-007
PAWC Response to CAUSE-PA 01-008, Attachment 1
PAWC Response to CAUSE-PA 01-014, Attachment
PAWC Response to CAUSE-PA 01-015
PAWC Response to CAUSE-PA 01-016, Attachment
PAWC Response to CAUSE-PA 01-017, Attachment
PAWC Response to CAUSE-PA 01-020, Attachment
PAWC Response to CAUSE-PA 01-021, Revised Attachment
PAWC Response to CAUSE-PA 01-022, Attachment
PAWC Response to CAUSE-PA 01-024
PAWC Response to CAUSE-PA 01-025
PAWC Response to CAUSE-PA 01-026, Attachment
PAWC Response to CAUSE-PA 01-027, Attachment
PAWC Response to CAUSE-PA 01-028, Attachment
PAWC Response to CAUSE-PA 01-030, Attachment
PAWC Response to CAUSE-PA 01-034, Attachment
PAWC Response to CAUSE-PA 01-035, Attachment
PAWC Response to CAUSE-PA 01-036, Attachment
PAWC Response to CAUSE-PA 01-041, Attachment
PAWC Response to CAUSE-PA 01-042, Attachment
PAWC Response to CAUSE-PA 02-001
PAWC Response to CAUSE-PA 02-040
PAWC Response to CAUSE-PA 03-001
PAWC Response to CAUSE-PA 03-003, Attachment
PAWC Response to CAUSE-PA 03-004

Interrogatories of OCA to PAWC

PAWC Response to OCA 04-021, Attachment
PAWC Response to OCA 04-022, Attachment

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-002

Responsible Witness: Max McClellan, Lead, Regulatory Analyst

Question:

From January 2023 to present, how many residential customers does/ did PAWC serve? Please disaggregate this data by service type (i.e. water only, wastewater only, combined), month, and year as of the last day of the month.

If this data is unavailable as of the last day of the month/ year, please provide this data, disaggregated as requested, and specify at which point in the month/year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

Please see CAUSE-PA 01-002_Attachment for the count of residential customers from January 2023 through November 2025.

Pennsylvania-American Water Company
Docket R-2025-3057983 (Water) and R-2025-3058051 (Wastewater)
CAUSE-PA 01-002 Residential Customer Count

CAUSE-PA 01-002_Attachment

Year	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
<u>Water</u>												
2023	626,438	626,788	627,166	627,185	627,516	627,704	627,866	628,208	628,382	629,042	629,109	629,403
2024	629,828	630,041	630,399	630,750	630,935	630,960	631,265	631,673	632,148	632,521	633,316	633,490
2025	634,002	634,036	634,080	635,622	635,460	638,268	639,075	639,082	639,438	641,016	641,322	
<u>Wastewater</u>												
2023	89,866	89,888	90,104	90,015	90,034	90,054	90,141	90,152	90,053	90,121	90,283	90,276
2024	90,233	90,261	90,297	90,220	90,209	90,193	90,209	90,393	90,314	90,666	105,621	105,592
2025	105,777	105,841	105,807	105,721	105,630	105,646	106,260	106,292	106,311	106,262	106,215	
<u>Dual</u>												
2023	63,046	63,100	63,153	63,148	63,172	63,174	63,208	63,289	63,284	63,374	63,433	63,566
2024	63,623	63,663	63,713	63,730	63,742	63,767	63,797	63,843	63,908	64,000	78,834	79,024
2025	78,918	78,928	78,941	78,898	78,841	79,455	79,491	79,519	79,541	79,530	79,859	
<u>Water Only</u>												
2023	563,392	563,688	564,013	564,037	564,344	564,530	564,658	564,919	565,098	565,668	565,676	565,837
2024	566,205	566,378	566,686	567,020	567,193	567,193	567,468	567,830	568,240	568,521	554,482	554,466
2025	555,084	555,108	555,139	556,724	556,619	558,813	559,584	559,563	559,897	561,486	561,463	
<u>Wastewater Only</u>												
2023	26,820	26,788	26,951	26,867	26,862	26,880	26,933	26,863	26,769	26,747	26,850	26,710
2024	26,610	26,598	26,584	26,490	26,467	26,426	26,412	26,550	26,406	26,666	26,787	26,568
2025	26,859	26,913	26,866	26,823	26,789	26,191	26,769	26,773	26,770	26,732	26,356	

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-003

Responsible Witness: Max McClellan, Lead, Regulatory Analyst

Question:

As of the most recent date available, how many residential customers does PAWC serve in each of its zones, disaggregated by service type (i.e. water only, wastewater only, combined).

Response:

Please see below for the number of residential customers served by the Company as of November 2025 in each of its rate zones, disaggregated by service type.

WATER RATE ZONES	WATER ONLY	COMBINED
RATE ZONE 1	555,917	76,671
RATE ZONE 2 VALLEY	4	1,631
RATE ZONE 3 TURBOTVILLE	11	258
RATE ZONE 4 FARMINGTON	25	384
RATE ZONE 5 EAST DUNKARD	1,495	
RATE ZONE 6 AUDUBON	2,620	
RATE ZONE 7 MANWALAMINK	33	572
RATE ZONE 8 APPALACHIAN	1,349	
RATE ZONE 9 CORNER WATER	9	343
WW RATE ZONES	WW ONLY	COMBINED
RATE ZONE 1	2,909	34,619
RATE ZONE 1A ROYERSFORD	18	1,252
RATE ZONE 1B YORK	11,231	0
RATE ZONE 1C FOSTER	470	0
RATE ZONE 1D BUTLER	205	14,295
RATE ZONE 1E SADSBUURY	206	1,130
RATE ZONE 1F FARMINGTON	7	384
RATE ZONE 1G MANWALAMINK	43	572
RATE ZONE 2 KANE, MCKEESPORT	9,595	1,784
RATE ZONE 2A SCRANTON	1,672	25,823

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-004

Responsible Witness:

Question:

From January 2023 to present, how many confirmed low income customers did PAWC serve? Please disaggregate this data by month and year, as of the last day of the month, and by the following Federal Poverty Level (FPL) ranges:

- a. 0-50% FPL;
- b. 51-100% FPL;
- c. 101-150% FPL; and
- d. 151-200% FPL.

If this data is unavailable as of the last day of the month/ year, please provide this data, disaggregated as requested, and specify at which point in the month/ year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

Please refer to CAUSE-PA 01-004_Attachment for the confirmed low-income customer count. The Company only has FPL information for low income customers enrolled in the BDP Program. Please refer to CAUSE-PA 01-014_Attachment for this information.

CAUSE-PA 01-004_Attachment

Date	Confirmed Low Income Customer Count
202301	56,740
202302	61,876
202303	60,478
202304	57,576
202305	62,823
202306	59,993
202307	62,154
202308	62,688
202309	61,545
202310	61,492
202311	62,697
202312	62,829
202401	60,897
202402	64,214
202403	63,060
202404	63,490
202405	63,872
202406	63,389
202407	64,473
202408	63,816
202409	62,307
202410	66,265
202411	63,244
202412	63,459
202501	65,518
202502	64,622
202503	65,985
202504	65,823
202505	66,268
202506	67,256
202507	69,182
202508	65,008
202509	67,748
202510	67,641
202511	65,898

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-005

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

How does PAWC define the term “confirmed low income customer”? Please also indicate what customer segments are included in PAWC’s designation of “confirmed low income customers.”

Response:

The Company defines “confirmed low income customer” to mean a customer for which the Company has received income information indicating that the customer has an annual income at or below 250 percent of the Federal Poverty guidelines, regardless of whether the customer is enrolled in one of PAWC’s low-income programs. The customer segments included in the designation of confirmed low-income customers are the same as the tier levels in the tariff: 0-50%, 51%-100%, 101%-150% and 151%-200%, and grant customers with income between 201%-250%.

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-006

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

Please indicate what steps PAWC has taken to identify low income customers as confirmed low income customers, and what information and/or documentation PAWC relied on to identify such customers.

Response:

PAWC identifies confirmed low income customers by examining weekly reports of customers who are enrolled in the Company's bill discount program. When these customers are enrolled into the discount program, their account is flagged in the Company's MyWater customer platform as low-income.

PAWC identifies confirmed low income customers by the income information customers provided to the Company through the Ability to Pay process, as well as through information provided to the Pennsylvania Public Utility Commission when an informal complaint is filed with the Bureau of Consumer Services or when a payment arrangement is requested through the Commission.

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-007

Responsible Witness: Deba Ather, Senior Manager of Regulatory Services for AWWSC

Question:

As of the most recent date available, how many estimated low income customers does PAWC serve? Please explain how PAWC arrived at these estimates, and provide a copy of any supporting documentation used to determine these estimates.

Response:

As of June 2025, PAWC serves both water and wastewater low-income customers. The estimated number of customers served by levels of household income stated in terms of multiples of Federal Poverty Level (FPL) are provided in the Community Analysis tabs of PAWC Exhibit DFA-1 and Exhibit DFA-2 and counts are estimated based on the most current available information on household income, size, and home ownership data from the U.S. Census Bureau for PAWC's service territory. These estimates are provided by FPL tiers that align with PAWC's CAP tier levels: 0-50%, 51%-100%, 101%-150%, 151%-200%, and 201%-250%.

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-008

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

Please describe all low income customer assistance programs offered by PAWC, and the eligibility criteria and enrollment procedures for each program or program component. Please also provide a copy of any internal or external policy, memorandum, training materials, outreach materials, or other documents describing the eligibility, benefits, and other terms and conditions for PAWC’s low income customer assistance programs.

Response:

Refer to the tables below.

H2O Help to Others™ – Bill Discount Program (BDP)	
Eligibility Requirements	<ul style="list-style-type: none"> • Gross monthly income at or below 200% of the Federal Poverty Income Guidelines (FPIG) • Account holder must reside in the household
Benefits	<ul style="list-style-type: none"> • 30% to 90% discount on the monthly service fee and a 20% to 80% discount on the monthly volumetric water charges • 37% to 85% discount on the total wastewater charges
Program Rules	<ul style="list-style-type: none"> • Must provide income documentation
Primary Enrollment	<ul style="list-style-type: none"> • Visit a participating Community Based Organization (CBO) - to locate a CBO near you visit DollarEnergy.org and select Agency Finder or call DEF at 1-888-282-6816 • Apply online using the MyApp customer portal which is accessible through Dollar Energy’s Website: https://www.dollarenergy.org/myapp/ • If unable to visit a CBO and cannot access the online application, call Dollar Energy Fund at 1-888-282-6816 to apply
Conservation and Education Kit	
Eligibility Requirements/Rules	<ul style="list-style-type: none"> • Enrollment in the Company’s Bill Discount Program
Benefits	<ul style="list-style-type: none"> • Water saving devices and conservation education

	* Kits include a WaterSense showerhead, water-saving faucet aerators, fill cycle diverters, and leak detection dye tablets. The kit also includes a pamphlet filled with money saving tips and information about water conservation.
Enrollment	<ul style="list-style-type: none"> • Bill Discount Program participants are sent a post card with a QR code and a phone number to obtain the conservation kit and educational materials • When the customer affirms they want the kit, a kit is mailed out

H2O Help to Others™ Arrears Forgiveness Program	
Eligibility Requirements	<ul style="list-style-type: none"> • Gross monthly income at or below 200% of FPIG • Account holder must reside in the household
Benefits	<ul style="list-style-type: none"> • Receive a \$25 credit each month a payment is received of the current discounted charges plus a \$5 copayment
Program Rules	<ul style="list-style-type: none"> • Must be enrolled in the BDP • Must have a balance over 60 days and at least \$150 past due • Must provide income documentation
Primary Enrollment	<ul style="list-style-type: none"> • Visit a participating Community Based Organization (CBO) - to locate a CBO near you visit DollarEnergy.org and select Agency Finder or call DEF at 1-888-282-6816 • Apply online using the MyApp customer portal which is accessible through Dollar Energy's Website: https://www.dollarenergy.org/myapp/ • If unable to visit a CBO and cannot access the online application, call Dollar Energy Fund at 1-888-282-6816 to apply
H2O Help to Others™ – Hardship Grants	
Eligibility Requirements	<ul style="list-style-type: none"> • Maximum household income at or below 250% of the FPIG • Account holder must reside in the household
Benefits	<ul style="list-style-type: none"> • Grant of up to \$500 for water. • Grant of up to \$500 for wastewater.
Program Rules	<ul style="list-style-type: none"> • Each customer account is eligible for multiple grants per program year not exceeding a total of \$500 per year for water and/or wastewater. • Income verification

Enrollment	<ul style="list-style-type: none">• Visit a participating Community Based Organization (CBO) - to locate a CBO near you visit DollarEnergy.org and select Agency Finder or call DEF at 1-888-282-6816• Apply online using the MyApp customer portal which is accessible through Dollar Energy's Website: https://www.dollarenergy.org/myapp/• If unable to visit a CBO and cannot access the online application, call Dollar Energy Fund at 1-888-282-6816 to apply
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Refer to the following attachments for the requested materials:

- CAUSE-PA 01-008_Attachment_01 for copies of the tariff pages for the low-income discount.
- CAUSE-PA 01-008_Attachment_02 for 2025 Federal Poverty Guidelines.
- CAUSE-PA 01-008_Attachment_03_CONFIDENTIAL for PAWC's CSO low-income bulletins.
- CAUSE-PA 01-008_Attachment_04_CONFIDENTIAL for PAWC's internal procedure for adding discount.
- CAUSE-PA 01-008_Attachment_05_CONFIDENTIAL for PAWC internal discount analysis procedure.
- OCA 03-001_Attachment_01 CONFIDENTIAL for PAWC's training materials and field agent instructions for the physical disconnection of service for nonpayment for residential customers.

Supplemental response:

Refer to the following CONFIDENTIAL attachments for Dollar Energy training materials related to PAWC's low income programs:

- CAUSE-PA 01-008_Attachment_06_CONFIDENTIAL for Arrearage Forgiveness Program and DEF Grants
- CAUSE-PA 01-008_Attachment_07_CONFIDENTIAL for PAWC Portal Activity
- CAUSE-PA 01-008_Attachment_08_CONFIDENTIAL for Training Manual for PAWC programs

PENNSYLVANIA-AMERICAN WATER COMPANY

SCHEDULE OF RATES

**LOW-INCOME RIDER – ALL RATE ZONES
FOR QUALIFYING RESIDENTIAL CUSTOMERS**

APPLICABILITY

This rider applies throughout the territories served under this tariff for service rendered on and after the Effective Date shown at the bottom of this page.

AVAILABILITY

This rider is available for a customer in the Residential Class that meets the low-income criteria of **200%** based on the Federal Poverty Level (“FPL”). (C)

RATE

The **discount off** the service charge or minimum bill under this tariff will be **as follows:** (C)

- Tier 1 (0%-50% of FPL): 90%** (C)(D)
- Tier 2 (51%-100% of FPL): 75%** (C)(D)
- Tier 3 (101%-150% of FPL): 60%** (C)(D)
- Tier 4 (151%-200% of FPL): 30%** (C)(D)

The **discount off the water usage rate** shall be billed as follows: (C)

- Tier 1 (0%-50% of FPL): 80%**
- Tier 2 (51%-100% of FPL): 65%** (C)(D)
- Tier 3 (101%-150% of FPL): 40%** (C)(D)
- Tier 4 (151%-200% of FPL): 20%** (C)(D)

(D) means Decrease and (C) means Change

PENNSYLVANIA-AMERICAN WATER COMPANY

SCHEDULE OF RATES

**LOW-INCOME RIDER – ALL RATE ZONES
FOR QUALIFYING RESIDENTIAL CUSTOMERS**

APPLICABILITY

This rider applies throughout the territories served under this tariff for service rendered on and after the Effective Date shown at the bottom of this page.

AVAILABILITY

This rider is available for a customer in the Residential Class that meets the low-income criteria of **200% (C)** based on the Federal Poverty Level.

RATE

Customers under this rate schedule will receive a discount off their total wastewater bill as follows:

Tier 1 (0%-50% of FPL):	85%	(D)
Tier 2 (51%-100% of FPL):	73%	(D)
Tier 3 (101%-150% of FPL):	55%	(D)
Tier 4 (151%-200% of FPL):	37%	(C)/(D)

(C) means Change and (D) means Decrease

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-014

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

From January 2023 to present, how many customers were enrolled in PAWC's BDP? Please disaggregate this data by service type (i.e. water only, wastewater only, combined), month, and year as of the last day of the month/year.

If this data is unavailable as of the last day of the month/ year, please provide this data, disaggregated as requested, and specify at which point in the month/ year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

Please refer to CAUSE-PA 01-014_Attachment for BDP enrollment data for the specified period.

CAUSE-PA St. 1, Appendix B
Cited Discovery Responses

Pennsylvania American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)

	Water Only					Wastewater Only					Combined Services				
	0-50% FPL	51-100% FPL	101-150% FPL	151-200% FPL	Total	0-50% FPL	51-100% FPL	101-150% FPL	151-200% FPL	Total	0-50% FPL	51-100% FPL	101-150% FPL	151-200% FPL	Total
Jan-23	3,926	6,244	13,538	1	23,709	123	175	559	0	857	655	781	1,927	0	3,363
Feb-23	3,972	6,264	13,551	1	23,788	124	174	547	0	845	659	796	1,930	0	3,385
Mar-23	3,996	6,289	13,433	1	23,719	127	177	545	0	849	660	800	1,914	0	3,374
Apr-23	3,987	6,270	13,330	1	23,588	128	176	542	0	846	662	801	1,893	0	3,356
May-23	4,084	6,326	13,152	1	23,563	139	181	556	0	876	678	815	1,877	0	3,370
Jun-23	4,098	6,367	12,959	1	23,425	150	189	557	0	896	684	805	1,854	0	3,343
Jul-23	4,121	6,349	12,834	1	23,305	161	192	549	0	902	685	822	1,835	0	3,342
Aug-23	4,141	6,333	13,088	1	23,563	171	208	597	0	976	685	827	1,912	0	3,424
Sep-23	4,171	6,352	13,413	1	23,937	181	217	637	0	1,035	693	823	2,016	0	3,532
Oct-23	4,374	6,496	13,420	1	24,291	192	238	654	0	1,084	726	854	2,022	0	3,602
Nov-23	4,586	6,583	13,205	1	24,375	225	263	658	0	1,146	741	889	2,032	0	3,662
Dec-23	4,779	6,642	13,147	1	24,569	249	287	679	0	1,215	763	904	2,045	0	3,712
Jan-24	4,868	6,707	13,100	1	24,676	266	292	689	0	1,247	766	921	2,041	0	3,728
Feb-24	4,938	6,769	13,020	1	24,728	275	304	691	0	1,270	775	931	2,031	0	3,737
Mar-24	4,964	6,782	12,948	1	24,695	288	309	685	0	1,282	788	942	2,019	0	3,749
Apr-24	5,028	6,816	12,814	1	24,659	298	318	683	0	1,299	808	949	1,999	0	3,756
May-24	5,161	6,883	12,727	1	24,772	306	327	675	0	1,308	832	972	1,993	0	3,797
Jun-24	5,139	6,837	12,577	1	24,554	305	329	668	0	1,302	839	967	1,966	0	3,772
Jul-24	5,209	6,784	12,470	1	24,464	316	338	658	0	1,312	857	976	1,945	0	3,778
Aug-24	5,222	6,819	12,235	218	24,494	322	337	640	5	1,304	899	1,001	1,911	50	3,861
Sep-24	5,245	6,831	12,066	311	24,453	327	341	628	8	1,304	911	1,035	1,878	62	3,886
Oct-24	5,355	6,929	11,921	531	24,736	351	351	633	24	1,359	912	1,047	1,825	106	3,890
Nov-24	5,445	7,003	11,908	646	25,002	344	369	617	34	1,364	955	1,073	1,829	129	3,986
Dec-24	5,609	7,061	11,850	679	25,199	359	369	618	40	1,386	990	1,088	1,804	143	4,025
Jan-25	5,717	7,188	11,827	787	25,519	358	367	618	43	1,386	1,015	1,111	1,813	166	4,105
Feb-25	5,857	7,264	11,818	842	25,781	368	366	607	47	1,388	1,035	1,135	1,816	180	4,166
Mar-25	5,994	7,422	11,836	939	26,191	384	392	622	57	1,455	1,046	1,160	1,817	198	4,221
Apr-25	4,285	4,857	5,607	1,047	15,796	290	286	386	67	1,029	793	864	1,052	226	2,935
May-25	3,314	4,326	4,445	1,147	13,232	232	255	286	72	845	662	780	836	236	2,514
Jun-25	3,506	4,504	4,576	1,231	13,817	246	268	299	83	896	729	866	886	256	2,737
Jul-25	3,490	4,574	4,551	1,268	13,883	246	270	299	81	896	766	922	908	277	2,873
Aug-25	3,539	4,663	4,626	1,340	14,168	250	280	308	88	926	792	961	915	308	2,976
Sep-25	3,688	4,782	4,549	1,459	14,478	289	303	325	96	1,013	818	999	917	344	3,078
Oct-25	3,765	4,954	4,631	1,545	14,895	336	356	370	119	1,181	852	1,051	964	378	3,245
Nov-25	3,950	5,102	4,729	1,577	15,358	359	385	387	125	1,256	893	1,076	985	398	3,352

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-015

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

From January 2023 to present, how many customers were enrolled in PAWC's BDP, disaggregated by month, year, and by the following Federal Poverty Level ranges:

- a. 0-50% FPL;
- b. 51-100% FPL;
- c. 101-150% FPL; and
- d. 151-200% FPL.

If this data is unavailable as of the last day of the month/ year, please provide this data, disaggregated as requested, and specify at which point in the month these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

Please refer to CAUSE-PA 01-014_Attachment for BDP enrollment data for the specified period.

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-016

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

From January 2023 to present, how many customers were enrolled in the arrearage forgiveness component of PAWC's BDP, disaggregated by month, year, and by the following Federal Poverty Level ranges:

- a. 0-50% FPL;
- b. 51-100% FPL;
- c. 101-150% FPL; and
- d. 151-100% FPL.

If this data is unavailable as of the last day of the month/ year, please provide this data, disaggregated as requested, and specify at which point in the month these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

The arrearage forgiveness component of the Company's AMP program began in October 2024. Please refer to CAUSE-PA 01-016_Attachment for the customer enrollment.

CAUSE-PA 01-016_Attachment

Effective Date	BDP AMP Enrollment				
	Tier 1 (0-50% FPL)	Tier 2 (51-100% FPL)	Tier 3 (101-150% FPL)	Tier 4 (151-200% FPL)	
11/1/2024	44	36	31	16	
12/1/2024	157	117	94	34	
1/1/2025	253	206	181	58	
2/1/2025	412	331	301	94	
3/1/2025	598	487	416	142	
4/1/2025	728	586	485	164	
5/1/2025	877	698	553	213	
6/1/2025	994	775	624	243	
7/1/2025	1,046	841	668	258	
8/1/2025	1,121	897	726	280	
9/1/2025	1,132	908	737	294	
10/1/2025	1,222	989	790	332	
11/1/2025	1,403	1,100	867	369	3,739

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-017

Responsible Witness: Max McClellan, Lead, Regulatory Analyst

Question:

From January 2023 to present, how many customers received a hardship grant through PAWC's H2O program, disaggregated by month and year (as of the last day of the month), and by the following Federal Poverty Level ranges:

- a. 0-50% FPL;
- b. 51-100% FPL;
- c. 101-150% FPL; and
- d. 151-200% FPL.

If this data is unavailable as of the last day of the month/ year, please provide this data, disaggregated as requested, and specify at which point in the month/year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

Please refer to CAUSE-PA 01-017_Attachment.

CAUSE-PA 01-017_Attachment

Central Region

	<u>Total</u>	<u>0%-50%</u>	<u>Total</u>	<u>51-100%</u>	<u>Total</u>	<u>101%-150%</u>	<u>Total</u>	<u>151%-200%</u>	
1/30/2023	\$ 640	2	\$ 124	1	\$ 196	1	\$ -	-	
2/28/2023	\$ 1,432	3	\$ -	-	\$ 436	1	\$ -	-	
3/31/2023	\$ 5,082	16	\$ 2,211	7	\$ 1,956	8	\$ 2,167	9	
4/30/2023	\$ 3,155	11	\$ 3,893	11	\$ 2,237	6	\$ 710	2	
5/31/2023	\$ 2,461	7	\$ 1,666	6	\$ 2,568	7	\$ 317	1	
6/30/2023	\$ 2,565	7	\$ 2,081	6	\$ 2,538	8	\$ 652	2	
7/31/2023	\$ 1,505	6	\$ 2,866	8	\$ 368	2	\$ 500	1	
8/31/2023	\$ 2,002	5	\$ 1,835	7	\$ 1,221	5	\$ -	-	
9/30/2023	\$ 2,055	5	\$ 2,581	8	\$ 1,848	5	\$ 1,014	3	
10/31/2023	\$ 38,786	91	\$ 33,172	79	\$ 21,521	53	\$ 9,844	24	
11/30/2023	\$ 55,892	142	\$ 37,386	97	\$ 37,705	102	\$ 14,907	38	
12/31/2023	\$ 37,796	101	\$ 27,635	70	\$ 14,737	40	\$ 7,912	23	
		396		300		238		103	1,037
1/31/2024	\$ 36,072	87	\$ 34,759	92	\$ 18,839	50	\$ 7,245	18	
2/29/2024	\$ 24,735	63	\$ 15,479	40	\$ 16,033	41	\$ 6,212	15	
3/31/2024	\$ 27,081	67	\$ 20,164	50	\$ 15,599	39	\$ 6,025	16	
4/30/2024	\$ 55,972	129	\$ 41,201	98	\$ 33,707	82	\$ 11,218	25	
5/31/2024	\$ 42,845	102	\$ 27,200	64	\$ 15,896	39	\$ 9,880	26	
6/30/2024	\$ 6,519	14	\$ 4,225	10	\$ 1,774	4	\$ 1,608	4	
7/31/2024	\$ 6,784	16	\$ 4,024	9	\$ 1,794	4	\$ 830	2	
8/31/2024	\$ 11,251	26	\$ 5,321	11	\$ 2,000	4	\$ 1,665	4	
9/30/2024	\$ -	-	\$ -	-	\$ -	-	\$ -	-	
10/31/2024	\$ 10,158	24	\$ 4,090	10	\$ 4,626	10	\$ 3,766	9	
11/30/2024	\$ 36,568	92	\$ 13,646	41	\$ 15,180	43	\$ 6,970	18	
12/31/2024	\$ 15,420	43	\$ 13,722	36	\$ 14,940	39	\$ 6,476	19	
		663		461		355		156	1,635
1/31/2025	\$ 45,198	129	\$ 38,315	109	\$ 36,230	100	\$ 15,331	44	
2/28/2025	\$ 46,183	137	\$ 36,098	102	\$ 35,575	98	\$ 9,248	30	
3/31/2025	\$ 54,167	146	\$ 33,386	95	\$ 29,226	87	\$ 16,186	56	
4/30/2025	\$ 52,282	150	\$ 28,031	91	\$ 24,362	81	\$ 11,572	37	
5/31/2025	\$ 43,646	131	\$ 27,119	83	\$ 30,987	98	\$ 12,530	41	
6/30/2025	\$ 50,955	159	\$ 32,421	110	\$ 21,936	82	\$ 16,079	45	
7/31/2025	\$ 50,058	164	\$ 42,124	136	\$ 24,846	94	\$ 12,513	45	
8/31/2025	\$ 28,373	94	\$ 24,504	84	\$ 15,167	54	\$ 10,134	38	
9/30/2025	\$ 7,282	16	\$ 5,632	12	\$ 3,571	8	\$ 1,500	3	
10/31/2025	\$ 66,416	187	\$ 48,705	133	\$ 34,634	100	\$ 14,170	46	
11/30/2025	\$ 91,490	265	\$ 57,490	164	\$ 51,168	151	\$ 21,032	68	
	\$ 536,050		\$ 373,825		\$ 307,702		\$ 140,295		821,822

Note: Beginning in October 2023, PAWC is no longer split by region. Data reported for October 2023 forward is operating company wide.

CAUSE-PA 01-017_Attachment

Northeast

	<u>Total</u>	<u>0%-50%</u>	<u>Total</u>	<u>51-100%</u>	<u>Total</u>	<u>101%-150%</u>	<u>Total</u>	<u>151%-200%</u>
1/30/2023	\$ 7,185	28	\$ 5,649	20	\$ 1,674	6	\$ 500	1
2/28/2023	\$ 9,949	28	\$ 7,534	19	\$ 5,827	16	\$ -	-
3/31/2023	\$ 29,262	81	\$ 28,631	76	\$ 19,002	62	\$ 5,562	20
4/30/2023	\$ 23,428	59	\$ 28,480	69	\$ 16,806	46	\$ 4,733	11
5/31/2023	\$ 3,909	11	\$ 1,277	4	\$ 922	2	\$ 954	3
6/30/2023	\$ 2,917	7	\$ 1,339	3	\$ 1,565	4	\$ -	-
7/31/2023	\$ -	-	\$ -	-	\$ -	-	\$ -	-
8/31/2023	\$ 6,214	15	\$ 5,346	15	\$ 8,191	20	\$ 500	1
9/30/2023	\$ 14,076	37	\$ 8,835	21	\$ 8,136	24	\$ 1,608	9

CAUSE-PA 01-017_Attachment

Northwest Region

	<u>Total</u>	<u>0%-50%</u>	<u>Total</u>	<u>51-100%</u>	<u>Total</u>	<u>101%-150%</u>	<u>Total</u>	<u>151%-200%</u>
1/30/2023	1,516	6	1,924	6	988	2	320	1
2/28/2023	1,117	4	958	3	154	1	1,231	4
3/31/2023	2,496	8	5,206	15	2,846	13	2,038	10
4/30/2023	3,534	10	4,181	13	2,774	10	1,109	3
5/31/2023	2,770	9	3,414	11	2,966	10	1,700	5
6/30/2023	2,560	8	4,748	16	3,569	13	896	2
7/31/2023	1,426	4	3,192	7	2,755	7	906	4
8/31/2023	3,876	13	2,098	7	2,442	9	2,318	6
9/30/2023	4,456	13	926	5	1,986	7	574	2

CAUSE-PA 01-017_Attachment

Southeast Region

	<u>Total</u>	<u>0%-50%</u>	<u>Total</u>	<u>51-100%</u>	<u>Total</u>	<u>101%-150%</u>	<u>Total</u>	<u>151%-200%</u>
1/30/2023	2,133	6	1,188	3	1,069	3	500	1
2/28/2023	958	2	1,371	3	926	2	500	1
3/31/2023	3,785	13	1,185	6	4,981	17	1,975	8
4/30/2023	3,119	7	1,620	6	3,927	10	1,305	4
5/31/2023	5,884	15	2,362	7	3,204	8	2,093	6
6/30/2023	2,861	8	3,272	8	1,745	6	1,560	4
7/31/2023	1,820	7	2,351	5	2,076	5	935	3
8/31/2023	891	2	225	1	980	3	301	1
9/30/2023	2,822	7	804	2	1,144	3	651	2

CAUSE-PA 01-017_Attachment

Southwest Region

	<u>Total</u>	<u>0%-50%</u>	<u>Total</u>	<u>51-100%</u>	<u>Total</u>	<u>101%-150%</u>	<u>Total</u>	<u>151%-200%</u>
1/30/2023	4,627	23	4,100	11	2,158	10	423	3
2/28/2023	7,630	19	6,104	17	2,805	7	1,159	4
3/31/2023	19,754	59	11,504	38	14,562	55	10,404	41
4/30/2023	13,951	44	14,473	45	9,732	32	7,668	24
5/31/2023	10,945	38	11,431	34	9,602	36	4,912	16
6/30/2023	10,893	33	16,874	47	9,923	35	5,890	20
7/31/2023	9,061	27	7,335	25	5,400	21	4,179	11
8/31/2023	9,147	30	6,907	23	4,789	20	5,321	16
9/30/2023	6,602	20	7,654	22	3,607	11	3,253	9

CAUSE-PA 01-017_Attachment

Wastewater

	<u>Total</u>	<u>0%-50%</u>	<u>Total</u>	<u>51-100%</u>	<u>Total</u>	<u>101%-150%</u>	<u>Total</u>	<u>151%-200%</u>
1/31/2023	\$ 3,524.00	11	\$ 2,214.00	8	\$ 1,089.00	3	\$ -	-
2/28/2023	\$ 3,100.00	10	\$ 3,495.00	9	\$ 4,193.00	9	\$ -	-
3/31/2023	\$ 10,459.00	24	\$ 11,023.00	26	\$ 6,690.00	15	\$ 1,287.00	3
4/30/2023	\$ 7,757.00	19	\$ 8,858.00	24	\$ 5,642.00	17	\$ 2,392.00	5
5/31/2023	\$ 4,294.00	14	\$ 2,363.00	6	\$ 3,799.00	11	\$ 1,025.00	3
6/30/2023	\$ 2,663.00	8	\$ 4,458.00	11	\$ 1,936.00	6	\$ 1,500.00	3
7/31/2023	\$ 1,000.00	2	\$ 830.00	2	\$ 1,481.00	4	\$ 1,000.00	3
8/31/2023	\$ 5,691.00	12	\$ 2,458.00	7	\$ 3,557.00	9	\$ 2,000.00	4
9/30/2023	\$ 10,393.00	27	\$ 3,935.00	13	\$ 10,997.00	27	\$ 2,870.00	10
10/31/2023	\$ 9,640.00	20	\$ 10,907.00	25	\$ 6,975.00	15	\$ 1,830.00	6
11/30/2023	\$ 13,131.00	35	\$ 11,984.00	30	\$ 11,642.00	31	\$ 3,438.00	7
12/31/2023	\$ 8,247.00	23	\$ 7,436.00	18	\$ 4,392.00	13	\$ 1,839.00	6
		205		179		160		50
1/31/2024	\$ 7,733.00	18	\$ 9,927.00	28	\$ 2,956.00	9	\$ 1,840.00	5
2/29/2024	\$ -	-	\$ 155.00	1	\$ -	-	\$ -	-
3/31/2024	\$ 699.00	2	\$ 300.00	1	\$ -	-	\$ -	-
4/30/2024	\$ 2,400.00	6	\$ -	-	\$ 247.00	1	\$ -	-
5/31/2024	\$ 3,128.00	7	\$ 1,402.00	3	\$ 665.00	2	\$ 500.00	1
6/30/2024	\$ 615.00	2	\$ 472.00	1	\$ 500.00	1	\$ -	-
7/31/2024	\$ -	-	\$ -	-	\$ -	-	\$ -	-
8/31/2024	\$ -	-	\$ -	-	\$ -	-	\$ -	-
9/30/2024	\$ -	-	\$ -	-	\$ -	-	\$ -	-
10/31/2024	\$ 1,238.00	4	\$ 300.00	1	\$ -	-	\$ 1,136.00	3
11/30/2024	\$ 1,371.00	4	\$ 185.00	1	\$ 2,065.00	5	\$ -	-
12/31/2024	\$ 1,818.00	4	\$ 1,317.00	3	\$ 2,088.00	5	\$ 500.00	1
		47		39		23		10
1/31/2025	\$ 694.00	2	\$ 943.00	3	\$ -	-	\$ 329.00	1
2/28/2025	\$ 1,783.00	5	\$ 2,306.00	6	\$ 2,767.00	6	\$ 786.00	3
3/31/2025	\$ 13,281.00	33	\$ 5,546.00	15	\$ 7,350.00	17	\$ 4,650.00	15
4/30/2025	\$ 8,293.00	20	\$ 8,252.00	21	\$ 5,925.00	15	\$ 2,946.00	8
5/31/2025	\$ 5,311.00	15	\$ 7,461.00	20	\$ 6,662.00	17	\$ 4,220.00	9
6/30/2025	\$ 8,490.00	30	\$ 5,529.00	21	\$ 6,927.00	26	\$ 2,227.00	6
7/31/2025	\$ 9,537.00	38	\$ 10,465.00	31	\$ 9,061.00	34	\$ 4,882.00	16
8/31/2025	\$ 7,130.00	18	\$ 6,411.00	21	\$ 4,296.00	11	\$ 3,422.00	11
9/30/2025	\$ 1,124.00	3	\$ 2,709.00	6	\$ 2,801.00	7	\$ 500.00	1
10/31/2025	\$ 17,795.00	46	\$ 8,490.00	25	\$ 8,832.00	26	\$ 4,451.00	11
11/30/2025	\$ 15,876.00	49	\$ 11,791.00	37	\$ 11,489.00	36	\$ 5,579.00	18
		259		206		195		99 \$ 759.00

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-020

Responsible Witness:

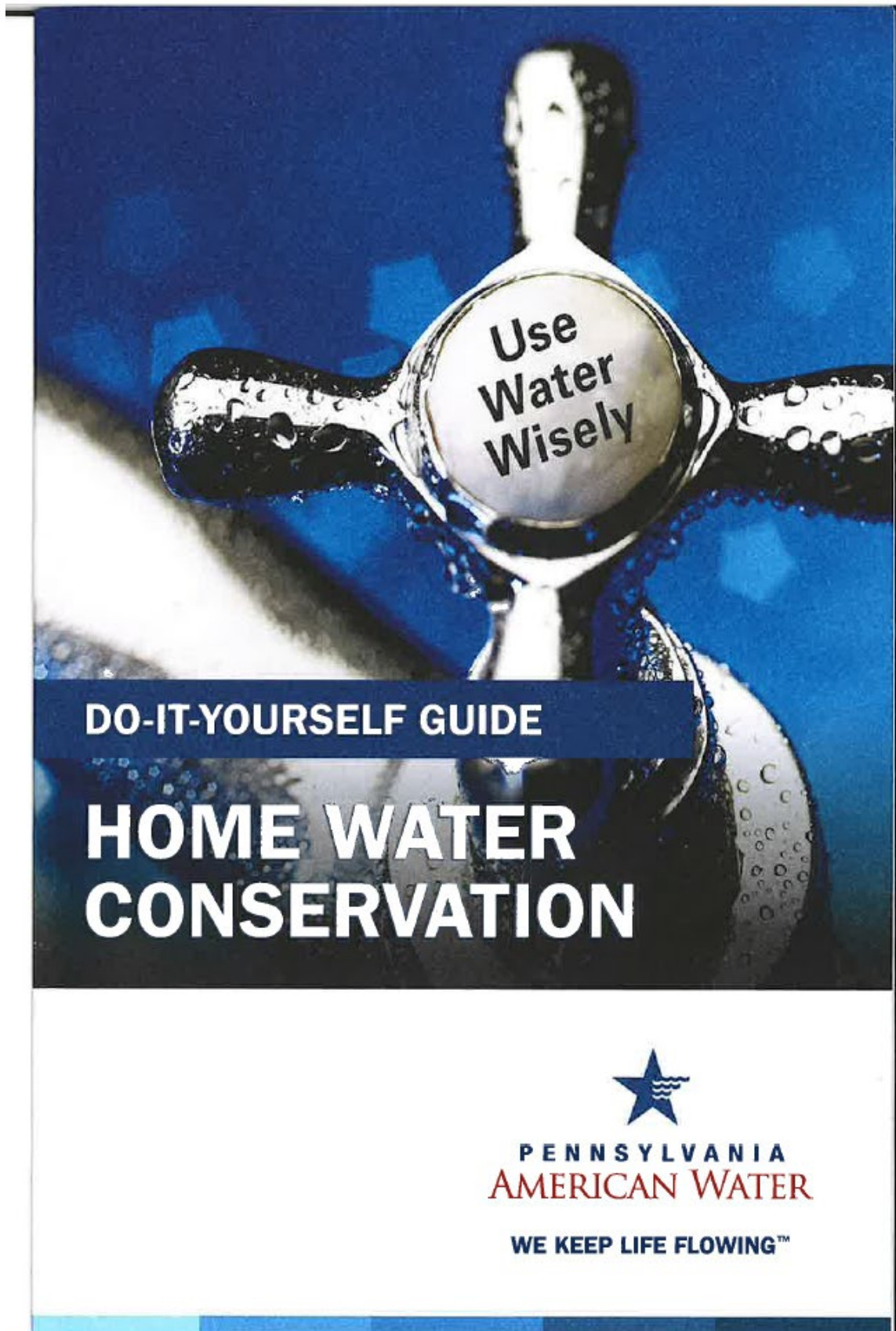
Question: Matthew Prine, Vice President and Chief Customer Officer

Please describe in detail what water conservation, service line, and/or leak repair assistance, if any, is provided to each of the following customer segments:

- a. Residential customers;
- b. Confirmed low income customers; and
- c. H2O program participants.

Response:

The Company does not provide service line and/or leak repair assistance to any customers. The Company provides water conservation kits and conservation education materials to H2O program participants who affirm they want to receive a kit. A copy of the conservation education materials is provided as CAUSE-PA 01-020_Attachment.



WELCOME

As you know, you are currently enrolled in Pennsylvania American Water's monthly Service Charge Discount Program based on your financial qualifications. The discount is part of the company's **H2O Help to Others Program®**, designed to lend a hand of support to customers in need during difficult times.



We are pleased to introduce you to another benefit of Pennsylvania American Water's program provided to eligible customers—a wise water use kit.

This kit helps you to control the cost of your water bill through conservation. Your kit has valuable products to save hot and cold water in showers and sinks, to conserve water with every flush and to find silent and costly toilet leaks. These products, along with wise water use tips, can help you save gallons of water every month.

If you are a renter and have plumbing leaks, contact your landlord immediately.

Your monthly water bills can be affordable when you know how to use water wisely, because the more water you save, the lower your bills will be.

Steps to saving water and money

- **Read this booklet and find out how the H2O Help to Others Program® can help you save money on your water bills.**
- **Install the water-saving products supplied in this kit.** Complete instructions are printed in this pamphlet.
- **Kit installation assistance:** If you are having difficulty with installing any of the products in the conservation kit, a local Pennsylvania American Water team member can provide assistance by phone. Please call (717) 550-1606 between the hours of 9 a.m. and 5 p.m., Monday through Friday. If unavailable, please leave a message.
- **Include the whole family in changing water-wasting habits into daily water-saving habits** by using the tips provided in this booklet.
- **Pay your Pennsylvania American Water bill every month.**

STEP 1: INSTALL THE WATER-SAVER KIT

WHAT YOUR WATER-SAVER KIT INCLUDES

- WaterSense showerhead and Teflon thread sealing tape
- Two water-saving faucet aerators (one kitchen; one bath)
- Fill cycle diverter
- Leak-detecting, non-toxic dye tablets for the toilet

HOW TO INSTALL YOUR WATER-SAVING DEVICES

WaterSense Showerhead

1. Unscrew old showerhead (turn counter-clockwise).
2. Clean shower arm threads.
3. Apply Teflon thread-sealing tape, wrapping clockwise.
4. Screw on showerhead. Do not over-tighten.
5. Run water to test for leaks. If needed, gently tighten with wrench.
6. Turn face of showerhead to select preferred spray option.



According to the EPA, replacing one showerhead with a WaterSense model can save the average family as much as **2,900 gallons** of water a year — or **more than \$70 in energy and water costs every year.**

Water-Saving Faucet Aerators

This kit features two aerators: a 2.2 size for the kitchen and a 1.5 size for the bath. Read the numbers on the side before installing.

1. Unscrew old faucet attachment. For an inside-threaded faucet, install aerator as is. For an outside-threaded faucet, first remove the top washer to expose inside threads and then install.
2. Hand tighten, but do not over-tighten. If a wrench is used, protect finish with a cloth.

Fill Cycle Diverter

The Fill Master Fill Cycle Diverter saves 0.5 to 1.5 gallons of water per flush, by diverting the majority of water that would normally flow down the toilet overflow tube back into your toilet tank during the toilet's filling cycle.

1. Pull hose loose from overflow tube.
2. Remove clip or holder from hose.
3. Insert Fill Master into end of hose.
4. Push Fill Master onto overflow tube with nozzle #1 inside the tube and nozzle #2 and #3 outside the tube. NOTE: Hose may need to be cut shorter for proper fit.
5. Position nozzle #2 or #3 into the tube as needed if the bowl does not fill to its normal level when flushed.

Leak Detecting Non-Toxic Dye Tablets for the Toilet

1. Remove lid from toilet tank.
2. Drop one dye tablet into water in tank.
3. Wait 15 minutes. If blue color appears in the bowl, your toilet has a silent leak and repairs need to be made.

STEP 2: FINDING WATER LEAKS



In just **10** minutes you could **save...**

- 10** percent on your water bill
- 10** thousand gallons of water
- 10** months of laundry water

Find and fix leaks!

Your meter can be a great tool to check for household leaks

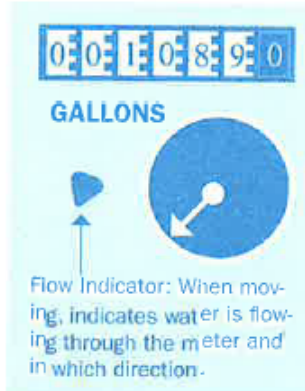
Not fixing a leaky toilet or faucet is like throwing money down the drain. If your water meter is in your home, you can use it to check for leaks. Start by making sure that no one is using water and that all water-using appliances are turned off, including

automatic ice makers. Then, check to see what type of water meter you have (dial or digital), and follow these simple steps.

Dial Meter: Check the flow indicator on your meter. If it is moving, it means that water is passing through the meter and there is a leak(s). If your meter does not have a low flow indicator, write down the meter reading shown on the dial and take note of the sweep hand's position. Check the meter in an hour. If the reading or the position of the sweep hand has changed, it may indicate that you have a leak(s).

Digital Meter: First, activate the screen on the digital meter by shining a light on the face of the meter. If the flow arrow appears on the screen or if the meter reading calculates, and the number is increases, that means water is moving through the meter. NOTE: The direction of the flow arrow should match the direction of the arrow that appears on the base of the meter itself. If it does not, this means water is flowing in the opposite direction. This should be addressed immediately by installing a dual check valve on your service line or having your current dual check valve serviced.

DIAL METER



10% of homes have leaks that waste 90 gallons or more per day.

Check and fix all household plumbing leaks or you could be throwing money down the drain (literally).



Check for faucet leaks

Faucet leaks are easy to detect. If your faucet drips, or worse, continues to keep running after you shut it off, it needs to be fixed. If the dripping water is hot, it is also costing you money to heat the water. Water dripping from the showerhead when the shower is off, or running out of the spout when the shower is on, is usually caused by bad washers or seats which need to be replaced.

Check for toilet leaks

Toilet leaks, which can often go unnoticed, are often caused by worn or damaged parts in the toilet flush tank, such as a bad flapper valve, flapper valve seat, ballcock valve, float arm or overflow tube. Use the dye tablets included with this kit to check for toilet leaks. Once you have used the tablets in the kit, you can continue to regularly check for leaks by pouring a cup of weak tea or coffee into your toilet tank. Using food coloring may permanently discolor your toilet bowl, if it has scratches or cracks.

STEP 3: PRACTICE WISE WATER USE

In the Bathroom

- The toilet is the biggest water waster in your house. By inserting the enclosed Fill Master Fill Cycle Diverter, you can prevent excess water from needlessly flowing down the drain. The fill cycle diverter saves water and money by making your toilet more efficient.
- Install water-saving showerheads and faucet aerators in your sinks.
- Shorten your shower to 7-10 minutes. Even shortening your shower by one or two minutes can save up to 150 gallons a month.
- Turn off the water when brushing your teeth. Saves one to two gallons each day.
- Rinse your razor with short blasts of water or by swishing it in a partially filled sink instead of running the water while you shave.
- Put bathroom trash and feminine hygiene products in the waste basket instead of flushing them down the toilet.

(More tips on the back panel)

In the Kitchen

- Run only full loads in the dishwasher.
- Before washing dishes by hand or in the dishwasher, scrape them; don't rinse first.
- If you wash dishes by hand, use two basins: one for washing and one for rinsing. Don't let the water run.
- Keep a bottle of drinking water in the refrigerator instead of running the tap for a cold glass.
- Rinse vegetables and fruit in a basin rather than under running water.
- Defrost frozen foods without running water over the packages. Plan ahead and place frozen items in the refrigerator overnight or defrost them in the microwave.

In the Laundry

- Washing machines use 15-40 gallons of water per load. If you have a machine with adjustable load controls, always adjust the water level to match the size of each load. If your machine doesn't adjust to different size loads, always wash full loads.
- The major cost in washing clothes is the hot water used. The more you wash and rinse with cold water, the more energy you will save.

Outside the Home

- Wash your car at a car wash that recycles its water. If washing at home, don't let the hose run continuously. Use a sprayer attachment on the hose that can easily be shut off.
- Drive your car onto the lawn before washing so that the rinse water can help water the lawn.
- Water the lawn only when it needs it, in the early morning or evening when there is less evaporation. Don't water on windy days. If the grass springs up when you walk on it, it doesn't need watering.
- Sweep driveways, patios and sidewalks with a broom instead of using the hose.

LEARN MORE

For more water-saving tips, check these sites out online:

- **WaterSense:** www.epa.gov/watersense
- **Alliance for Water Efficiency Home Water Works:** www.home-water-works.org
- **Pennsylvania American Water:** www.pennsylvaniaamwater.com

11-2021

Pennsylvania American Water is a proud member of the US EPA's WaterSense Program. We are committed to conserving our most precious natural resource – water, so it is available to meet the needs of future generations.



**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-021

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

From January 2023 to present, how many customers received each of the following assistance types, disaggregated by year, as of the last day of the year:

- a. Water conservation assistance;
- b. Service line assistance; and
- c. leak repair assistance.

If this data is unavailable as of the last day of the year, please provide this data, disaggregated as requested, and specify at which point in the year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

- a. Please refer to CAUSE-PA 01-021_Attachment.
- b. PAWC does not provide service line assistance.
- c. PAWC does not provide leak repair assistance.

Supplemental Response:

- a. Please see CAUSE-PA 01-021_Revised_Attachment for revisions to the number of kits distributed in 2023 and 2025 as the initial response did not reflect the correct amount of kits distributed in those two years.

Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)

CAUSE-PA 01-021_Revised_Attachment

Customers Receiving Conservation Kits

<u>Year</u>	<u>Number of Kits</u>
2023	1,195
2024	2,881
2025 (As of November 30)	882

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-022

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

From January 2023 to present, disaggregated by service type (i.e. water only, wastewater only, combined), month, and year as of the last day of the month, please indicate the following:

- a. The number of participants who entered PAWC's BDP with unpaid account balances;
- b. The mean and median amount of dollars of unpaid account balances for BDP participants, at the time those participants entered the BDP;

If this data is unavailable as of the last day of the month/year, please provide this data, disaggregated as requested, and specify at which point in the month/year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

Please refer to CAUSE-PA 01-022_Attachment.

CAUSE-PA St. 1, Appendix B
Cited Discovery Responses

CAUSE-PA 01-022_Attachment

Water Only			WasteWater Only			Combined					
Month	A. The number of participants who entered PAWC's BDP with unpaid account balances;	B. mean amount of dollars of unpaid account balances for BDP participants;	B. median amount of dollars of unpaid account balances for BDP participants;	Month	A. The number of participants who entered PAWC's BDP with unpaid account balances;	B. mean amount of dollars of unpaid account balances for BDP participants;	B. median amount of dollars of unpaid account balances for BDP participants;	Month	A. The number of participants who entered PAWC's BDP with unpaid account balances;	B. mean amount of dollars of unpaid account balances for BDP participants;	B. median amount of dollars of unpaid account balances for BDP participants;
202301	57	\$297.83	\$157.22	202301	8	\$395.91	\$254.71	202301	40	\$420.04	\$167.13
202302	117	\$319.18	\$133.19	202302	4	\$669.89	\$61.51	202302	51	\$274.85	\$144.21
202303	104	\$357.22	\$171.05	202303	4	\$631.91	\$543.70	202303	78	\$492.46	\$174.04
202304	110	\$384.21	\$163.84	202304	6	\$558.22	\$379.12	202304	75	\$474.40	\$186.39
202305	111	\$400.88	\$169.49	202305	16	\$723.97	\$242.68	202305	67	\$519.03	\$291.71
202306	112	\$263.68	\$138.10	202306	15	\$595.72	\$203.48	202306	63	\$537.86	\$237.12
202307	95	\$340.38	\$185.72	202307	19	\$327.23	\$212.65	202307	49	\$463.97	\$236.45
202308	584	\$255.97	\$147.61	202308	69	\$535.23	\$260.82	202308	329	\$323.70	\$164.24
202309	396	\$267.50	\$150.71	202309	47	\$406.04	\$241.55	202309	246	\$382.62	\$213.41
202310	288	\$531.96	\$266.94	202310	20	\$470.02	\$345.24	202310	197	\$487.28	\$273.97
202311	323	\$923.71	\$330.29	202311	37	\$904.49	\$538.14	202311	246	\$917.83	\$379.06
202312	208	\$529.06	\$309.02	202312	19	\$1,243.06	\$448.12	202312	111	\$620.35	\$306.29
202401	182	\$560.69	\$269.85	202401	16	\$1,089.08	\$522.18	202401	111	\$536.76	\$241.58
202402	205	\$512.65	\$228.21	202402	21	\$842.61	\$310.77	202402	118	\$823.92	\$489.54
202403	154	\$503.05	\$227.49	202403	17	\$731.19	\$424.42	202403	112	\$825.69	\$383.97
202404	215	\$542.28	\$292.75	202404	11	\$735.02	\$665.65	202404	122	\$563.68	\$308.43
202405	230	\$590.07	\$277.12	202405	9	\$1,085.85	\$1,196.87	202405	88	\$920.92	\$541.31
202406	124	\$479.05	\$245.73	202406	18	\$829.10	\$473.73	202406	85	\$503.10	\$288.59
202407	155	\$421.95	\$253.66	202407	14	\$495.28	\$479.65	202407	109	\$352.13	\$212.64
202408	223	\$478.49	\$290.30	202408	15	\$750.92	\$282.07	202408	151	\$461.21	\$227.06
202409	204	\$404.13	\$272.39	202409	12	\$335.70	\$357.52	202409	118	\$390.32	\$201.22
202410	303	\$437.11	\$276.32	202410	21	\$560.24	\$459.13	202410	216	\$550.72	\$301.42
202411	272	\$485.74	\$319.96	202411	16	\$640.11	\$474.27	202411	141	\$364.53	\$222.24
202412	307	\$588.33	\$405.60	202412	16	\$844.46	\$660.41	202412	218	\$458.63	\$325.84
202501	383	\$560.09	\$390.37	202501	21	\$1,088.50	\$672.89	202501	219	\$468.03	\$317.63
202502	287	\$556.43	\$374.47	202502	36	\$1,320.68	\$1,273.26	202502	229	\$493.45	\$309.21
202503	353	\$711.57	\$460.67	202503	43	\$967.76	\$906.22	202503	260	\$936.56	\$490.07
202504	259	\$727.20	\$484.77	202504	34	\$727.07	\$481.69	202504	194	\$846.93	\$382.81
202505	246	\$678.86	\$476.93	202505	35	\$858.65	\$761.29	202505	178	\$765.31	\$474.98
202506	261	\$658.70	\$423.84	202506	32	\$1,081.39	\$628.02	202506	210	\$680.42	\$355.54
202507	218	\$669.86	\$441.17	202507	35	\$1,192.17	\$529.00	202507	178	\$655.02	\$371.55
202508	354	\$607.74	\$393.65	202508	34	\$1,030.41	\$707.70	202508	249	\$476.51	\$345.68
202509	418	\$594.79	\$404.07	202509	127	\$909.02	\$649.56	202509	336	\$700.08	\$391.62
202510	382	\$539.95	\$381.64	202510	19	\$1,961.62	\$1,145.78	202510	259	\$553.45	\$356.96
202511	33	\$536.06	\$396.23	202511	1	\$185.34	\$185.34	202511	8	\$191.16	\$190.26
	8273	\$524.55			867	\$842.09			5461	\$580.76	
	2023	\$422.01			2023	\$609.70			2023	\$507.39	
	2024	\$503.52			2024	\$742.35			2024	\$545.17	
	2025	\$621.92			2025	\$1,033.71			2025	\$654.21	

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-024

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

What is the average annual income of PAWC's currently identified H2O program customers for which it has obtained income information?

Response:

As of November 2025, the average annual income of the Bill Discount Program customers for which the Company has obtained income information is \$21,350.65.

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-025

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

What is the average annual income of PAWC's currently identified confirmed low income customers for which it has obtained income information?

Response:

The average annual income of PAWC's confirmed low-income customers is \$11,387.21.

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-026

Responsible Witness: Max McClellan, Lead, Regulatory Analyst

Question:

For PAWC's water customers, please identify the financial impact of the proposed rate increase on each of the following customer segments, at different usage levels (1,000 gal; 2,000 gal; 3,000 gal; 6,000 gal; and 8,000 gal):

- a. residential customers,
- b. confirmed low income customers, and
- c. customers enrolled in PAWC's BDP.

Please provide a copy of any formal or informal assessment of specific rate impacts, and a live Excel spreadsheet with all formula intact of any workpapers or other documents used to perform the calculations contained in this response. If you are unable to identify the financial impact, or assert that there will be no impact, please explain. Please provide this information disaggregated by rate district.

Response:

- a. Please refer to Excel file CAUSE-PA 01-026_Attachment.xlsx for the bill impact of the proposed rate for residential water customers.
- b. The impact on "confirmed low income customers" is dependent on whether or not the customer is enrolled in the BDP. Refer to the responses to parts a and c.
- c. Please refer to the attachment identified in response to subpart a, which includes the proposed average bills for customers enrolled in PAWC's BDP at the specified usage levels. These figures show what those customers would pay under the proposed rates, including BDP discounts.

PENNSYLVANIA-AMERICAN WATER COMPANY
ZONE 1 - PAWC

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS (1)	BILLS UNDER		INCREASE		BILLS UNDER PROPOSED LOW INCOME RIDER				5/8-Meter All Usage	Present \$18.80 1.8772	Proposed \$20.00 2.3069
	PRESENT RATES (2)	PROPOSED RATES (3)	AMOUNT (4)	PERCENT (5)	Tier 1 82% (6)	Tier 2 67% (7)	Tier 3 44% (8)	Tier 4 22% (9)			
0	\$19.15	\$20.00	\$0.85	4.42%	\$3.60	\$6.60	\$11.20	\$15.60			
100	21.07	22.31	1.24	5.89%	4.02	7.36	12.49	17.40			
500	28.72	31.53	2.82	9.82%	5.68	10.41	17.66	24.60	DSIC+EADIT	1.88%	0.00%
1,000	38.28	43.07	4.79	12.52%	7.75	14.21	24.12	33.59	STAS		
2,000	57.40	66.14	8.73	15.22%	11.90	21.83	37.04	51.59			
3,000	76.53	89.21	12.68	16.57%	16.06	29.44	49.96	69.58	DSIC	1.88%	
3,263	81.56	95.27	13.72	16.82%	17.15	31.44	53.35	74.31	EADIT		
3,500	86.09	100.74	14.65	17.02%	18.13	33.24	56.42	78.58			
4,000	95.65	112.28	16.62	17.38%	20.21	37.05	62.87	87.58			
5,000	114.78	135.35	20.57	17.92%	24.36	44.66	75.79	105.57			
6,000	133.90	158.41	24.51	18.31%	28.51	52.28	88.71	123.56			
7,000	153.03	181.48	28.46	18.59%	32.67	59.89	101.63	141.56			
8,000	172.15	204.55	32.40	18.82%	36.82	67.50	114.55	159.55			
9,000	191.28	227.62	36.34	19.00%	40.97	75.11	127.47	177.54			
10,000	210.40	250.69	40.29	19.15%	45.12	82.73	140.39	195.54			
11,000	229.53	273.76	44.23	19.27%	49.28	90.34	153.31	213.53			
12,000	248.65	296.83	48.18	19.37%	53.43	97.95	166.22	231.53			
13,000	267.78	319.90	52.12	19.46%	57.58	105.57	179.14	249.52			
14,000	286.90	342.97	56.06	19.54%	61.73	113.18	192.06	267.51			
15,000	306.03	366.04	60.01	19.61%	65.89	120.79	204.98	285.51			
16,000	325.15	389.10	63.95	19.67%	70.04	128.40	217.90	303.50			
17,000	344.28	412.17	67.90	19.72%	74.19	136.02	230.82	321.49			
18,000	363.40	435.24	71.84	19.77%	78.34	143.63	243.74	339.49			
19,000	382.53	458.31	75.78	19.81%	82.50	151.24	256.65	357.48			
20,000	401.65	481.38	79.73	19.85%	86.65	158.86	269.57	375.48			
21,000	420.78	504.45	83.67	19.89%	90.80	166.47	282.49	393.47			
22,000	439.90	527.52	87.62	19.92%	94.95	174.08	295.41	411.46			
23,000	459.03	550.59	91.56	19.95%	99.11	181.69	308.33	429.46			
24,000	478.15	573.66	95.50	19.97%	103.26	189.31	321.25	447.45			
25,000	497.28	596.73	99.45	20.00%	107.41	196.92	334.17	465.45			

Bill at present rate was calculated using DSIC rate @ 1.88%
Bill at proposed rate was calculated using DSIC rate @ 0.00%

PENNSYLVANIA-AMERICAN WATER COMPANY
ZONE 2 - VALLEY WATER

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS (1)	BILLS UNDER		INCREASE		BILLS UNDER PROPOSED LOW INCOME RIDER				5/8-Meter All Usage	Present \$18.80 1.6276	Proposed \$20.00 2.3069
	PRESENT RATES (2)	PROPOSED RATES (3)	AMOUNT (4)	PERCENT (5)	Tier 1 82% (6)	Tier 2 67% (7)	Tier 3 44% (8)	Tier 4 22% (9)			
0	\$19.15	\$20.00	\$0.85	4.42%	\$3.60	\$6.60	\$11.20	\$15.60			
100	20.81	22.31	1.50	7.18%	4.02	7.36	12.49	17.40			
500	27.44	31.53	4.09	14.90%	5.68	10.41	17.66	24.60	DSIC	1.88%	0.00%
1,000	35.74	43.07	7.33	20.52%	7.75	14.21	24.12	33.59	STAS		
2,000	52.32	66.14	13.82	26.42%	11.90	21.83	37.04	51.59			
3,000	68.90	89.21	20.31	29.47%	16.06	29.44	49.96	69.58	DSIC	1.88%	
3,263	73.26	95.27	22.01	30.05%	17.15	31.44	53.35	74.31	EADIT		
3,500	77.19	100.74	23.55	30.51%	18.13	33.24	56.42	78.58			
4,000	85.48	112.28	26.79	31.35%	20.21	37.05	62.87	87.58			
5,000	102.06	135.35	33.28	32.61%	24.36	44.66	75.79	105.57			
6,000	118.65	158.41	39.77	33.52%	28.51	52.28	88.71	123.56			
7,000	135.23	181.48	46.26	34.21%	32.67	59.89	101.63	141.56			
8,000	151.81	204.55	52.74	34.74%	36.82	67.50	114.55	159.55			
9,000	168.39	227.62	59.23	35.17%	40.97	75.11	127.47	177.54			
10,000	184.97	250.69	65.72	35.53%	45.12	82.73	140.39	195.54			
11,000	201.56	273.76	72.20	35.82%	49.28	90.34	153.31	213.53			
12,000	218.14	296.83	78.69	36.07%	53.43	97.95	166.22	231.53			
13,000	234.72	319.90	85.18	36.29%	57.58	105.57	179.14	249.52			
14,000	251.30	342.97	91.66	36.48%	61.73	113.18	192.06	267.51			
15,000	267.88	366.04	98.15	36.64%	65.89	120.79	204.98	285.51			
16,000	284.47	389.10	104.64	36.78%	70.04	128.40	217.90	303.50			
17,000	301.05	412.17	111.13	36.91%	74.19	136.02	230.82	321.49			
18,000	317.63	435.24	117.61	37.03%	78.34	143.63	243.74	339.49			
19,000	334.21	458.31	124.10	37.13%	82.50	151.24	256.65	357.48			
20,000	350.79	481.38	130.59	37.23%	86.65	158.86	269.57	375.48			
21,000	367.38	504.45	137.07	37.31%	90.80	166.47	282.49	393.47			
22,000	383.96	527.52	143.56	37.39%	94.95	174.08	295.41	411.46			
23,000	400.54	550.59	150.05	37.46%	99.11	181.69	308.33	429.46			
24,000	417.12	573.66	156.53	37.53%	103.26	189.31	321.25	447.45			
25,000	433.70	596.73	163.02	37.59%	107.41	196.92	334.17	465.45			

Bill at present rate was calculated using DSIC rate @ 1.88%

Bill at proposed rate was calculated using DSIC rate @ 0.00%

PENNSYLVANIA-AMERICAN WATER COMPANY
ZONE 3 - TURBOTVILLE

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS (1)	BILLS UNDER		INCREASE		BILLS UNDER PROPOSED LOW INCOME RIDER				Present Proposed	Present Proposed	
	PRESENT RATES (2)	PROPOSED RATES (3)	AMOUNT (4)	PERCENT (1)	Tier 1 82% (6)	Tier 2 67% (7)	Tier 3 44% (8)	Tier 4 22% (9)			
0	\$19.15	\$20.00	\$0.85	4.42%	\$3.60	\$6.60	\$11.20	\$15.60	5/8-Meter All Usage	\$18.80 1.8772	\$20.00 2.3069
100	21.07	22.31	1.24	5.89%	4.02	7.36	12.49	17.40			
500	28.72	31.53	2.82	9.82%	5.68	10.41	17.66	24.60	DSIC+EADIT	1.88%	0.00%
1,000	38.28	43.07	4.79	12.52%	7.75	14.21	24.12	33.59	STAS		
2,000	57.40	66.14	8.73	15.22%	11.90	21.83	37.04	51.59			
3,000	76.53	89.21	12.68	16.57%	16.06	29.44	49.96	69.58	DSIC	1.88%	
3,263	81.56	95.27	13.72	16.82%	17.15	31.44	53.35	74.31	EADIT		
3,500	86.09	100.74	14.65	17.02%	18.13	33.24	56.42	78.58			
4,000	95.65	112.28	16.62	17.38%	20.21	37.05	62.87	87.58			
5,000	114.78	135.35	20.57	17.92%	24.36	44.66	75.79	105.57			
6,000	133.90	158.41	24.51	18.31%	28.51	52.28	88.71	123.56			
7,000	153.03	181.48	28.46	18.59%	32.67	59.89	101.63	141.56			
8,000	172.15	204.55	32.40	18.82%	36.82	67.50	114.55	159.55			
9,000	191.28	227.62	36.34	19.00%	40.97	75.11	127.47	177.54			
10,000	210.40	250.69	40.29	19.15%	45.12	82.73	140.39	195.54			
11,000	229.53	273.76	44.23	19.27%	49.28	90.34	153.31	213.53			
12,000	248.65	296.83	48.18	19.37%	53.43	97.95	166.22	231.53			
13,000	267.78	319.90	52.12	19.46%	57.58	105.57	179.14	249.52			
14,000	286.90	342.97	56.06	19.54%	61.73	113.18	192.06	267.51			
15,000	306.03	366.04	60.01	19.61%	65.89	120.79	204.98	285.51			
16,000	325.15	389.10	63.95	19.67%	70.04	128.40	217.90	303.50			
17,000	344.28	412.17	67.90	19.72%	74.19	136.02	230.82	321.49			
18,000	363.40	435.24	71.84	19.77%	78.34	143.63	243.74	339.49			
19,000	382.53	458.31	75.78	19.81%	82.50	151.24	256.65	357.48			
20,000	401.65	481.38	79.73	19.85%	86.65	158.86	269.57	375.48			
21,000	420.78	504.45	83.67	19.89%	90.80	166.47	282.49	393.47			
22,000	439.90	527.52	87.62	19.92%	94.95	174.08	295.41	411.46			
23,000	459.03	550.59	91.56	19.95%	99.11	181.69	308.33	429.46			
24,000	478.15	573.66	95.50	19.97%	103.26	189.31	321.25	447.45			
25,000	497.28	596.73	99.45	20.00%	107.41	196.92	334.17	465.45			

Bill at present rate was calculated using DSIC rate @ 1.88%
Bill at proposed rate was calculated using DSIC rate @ 0.00%

PENNSYLVANIA-AMERICAN WATER COMPANY
ZONE 4 - FARMINGTON

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RESIDENTIAL - MONTHLY
SERVICE CHARGE PER EDU FOR PRESENT & 5/8 INCH METERS FOR PROPOSED

CONSUMPTION GALLONS (1)	BILLS UNDER		INCREASE		BILLS UNDER PROPOSED LOW INCOME RIDER				5/8-Meter First 5,000 or All over 5,000 DSIC+EADIT STAS DSIC EADIT	Present \$67.50 0.0000 1.5000 0.00% 0.00%	Proposed \$ 20.00 2.3069 2.3069 0.00% 0.00%
	PRESENT RATES (2)	PROPOSED RATES (3)	AMOUNT (4)	PERCENT (5)	Tier 1 82% (6)	Tier 2 67% (7)	Tier 3 44% (8)	Tier 4 22% (9)			
	0	\$67.50	\$20.00	(\$47.50)	-70.37%	\$3.60	\$6.60	\$11.20			
100	67.50	22.31	(45.19)	-66.95%	4.02	7.36	12.49	17.40			
500	67.50	31.53	(35.97)	-53.28%	5.68	10.41	17.66	24.60			
1,000	67.50	43.07	(24.43)	-36.19%	7.75	14.21	24.12	33.59			
2,000	67.50	66.14	(1.36)	-2.02%	11.90	21.83	37.04	51.59			
3,000	67.50	89.21	21.71	32.16%	16.06	29.44	49.96	69.58			
3,263	67.50	95.27	27.77	41.15%	17.15	31.44	53.35	74.31			
3,500	67.50	100.74	33.24	49.25%	18.13	33.24	56.42	78.58			
4,000	67.50	112.28	44.78	66.33%	20.21	37.05	62.87	87.58			
5,000	67.50	135.35	67.85	100.51%	24.36	44.66	75.79	105.57			
6,000	82.50	158.41	75.91	92.02%	28.51	52.28	88.71	123.56			
7,000	97.50	181.48	83.98	86.14%	32.67	59.89	101.63	141.56			
8,000	112.50	204.55	92.05	81.82%	36.82	67.50	114.55	159.55			
9,000	127.50	227.62	100.12	78.53%	40.97	75.11	127.47	177.54			
10,000	142.50	250.69	108.19	75.92%	45.12	82.73	140.39	195.54			
11,000	157.50	273.76	116.26	73.82%	49.28	90.34	153.31	213.53			
12,000	172.50	296.83	124.33	72.07%	53.43	97.95	166.22	231.53			
13,000	187.50	319.90	132.40	70.61%	57.58	105.57	179.14	249.52			
14,000	202.50	342.97	140.47	69.37%	61.73	113.18	192.06	267.51			
15,000	217.50	366.04	148.54	68.29%	65.89	120.79	204.98	285.51			
16,000	232.50	389.10	156.60	67.36%	70.04	128.40	217.90	303.50			
17,000	247.50	412.17	164.67	66.53%	74.19	136.02	230.82	321.49			
18,000	262.50	435.24	172.74	65.81%	78.34	143.63	243.74	339.49			
19,000	277.50	458.31	180.81	65.16%	82.50	151.24	256.65	357.48			
20,000	292.50	481.38	188.88	64.57%	86.65	158.86	269.57	375.48			
21,000	307.50	504.45	196.95	64.05%	90.80	166.47	282.49	393.47			
22,000	322.50	527.52	205.02	63.57%	94.95	174.08	295.41	411.46			
23,000	337.50	550.59	213.09	63.14%	99.11	181.69	308.33	429.46			
24,000	352.50	573.66	221.16	62.74%	103.26	189.31	321.25	447.45			
25,000	367.50	596.73	229.23	62.37%	107.41	196.92	334.17	465.45			

Bill at present rate was calculated using DSIC rate @ 0.00%

Bill at proposed rate was calculated using DSIC rate @ 0.00%

PENNSYLVANIA-AMERICAN WATER COMPANY
ZONE 5 - EAST DUNKARD

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS (1)	BILLS UNDER		INCREASE		BILLS UNDER PROPOSED LOW INCOME RIDER				5/8-Meter All Usage	Present \$35.04 1.3100	Proposed \$20.00 2.3069
	PRESENT RATES (2)	PROPOSED RATES (3)	AMOUNT (4)	PERCENT (1)	Tier 1 82% (6)	Tier 2 67% (7)	Tier 3 44% (8)	Tier 4 22% (9)			
0	\$35.04	\$20.00	(\$15.04)	-42.92%	\$3.60	\$6.60	\$11.20	\$15.60			
100	36.35	22.31	(14.04)	-38.63%	4.02	7.36	12.49	17.40			
500	41.59	31.53	(10.06)	-24.18%	5.68	10.41	17.66	24.60	DSIC+EADIT	0.00%	0.00%
1,000	48.14	43.07	(5.07)	-10.53%	7.75	14.21	24.12	33.59	STAS		
2,000	61.24	66.14	4.90	8.00%	11.90	21.83	37.04	51.59			
3,000	74.34	89.21	14.87	20.00%	16.06	29.44	49.96	69.58	DSIC	0.00%	
3,263	77.79	95.27	17.49	22.48%	17.15	31.44	53.35	74.31	EADIT		
3,500	80.89	100.74	19.85	24.54%	18.13	33.24	56.42	78.58			
4,000	87.44	112.28	24.84	28.40%	20.21	37.05	62.87	87.58			
5,000	100.54	135.35	34.81	34.62%	24.36	44.66	75.79	105.57			
6,000	113.64	158.41	44.77	39.40%	28.51	52.28	88.71	123.56			
7,000	126.74	181.48	54.74	43.19%	32.67	59.89	101.63	141.56			
8,000	139.84	204.55	64.71	46.28%	36.82	67.50	114.55	159.55			
9,000	152.94	227.62	74.68	48.83%	40.97	75.11	127.47	177.54			
10,000	166.04	250.69	84.65	50.98%	45.12	82.73	140.39	195.54			
11,000	179.14	273.76	94.62	52.82%	49.28	90.34	153.31	213.53			
12,000	192.24	296.83	104.59	54.40%	53.43	97.95	166.22	231.53			
13,000	205.34	319.90	114.56	55.79%	57.58	105.57	179.14	249.52			
14,000	218.44	342.97	124.53	57.01%	61.73	113.18	192.06	267.51			
15,000	231.54	366.04	134.50	58.09%	65.89	120.79	204.98	285.51			
16,000	244.64	389.10	144.46	59.05%	70.04	128.40	217.90	303.50			
17,000	257.74	412.17	154.43	59.92%	74.19	136.02	230.82	321.49			
18,000	270.84	435.24	164.40	60.70%	78.34	143.63	243.74	339.49			
19,000	283.94	458.31	174.37	61.41%	82.50	151.24	256.65	357.48			
20,000	297.04	481.38	184.34	62.06%	86.65	158.86	269.57	375.48			
21,000	310.14	504.45	194.31	62.65%	90.80	166.47	282.49	393.47			
22,000	323.24	527.52	204.28	63.20%	94.95	174.08	295.41	411.46			
23,000	336.34	550.59	214.25	63.70%	99.11	181.69	308.33	429.46			
24,000	349.44	573.66	224.22	64.16%	103.26	189.31	321.25	447.45			
25,000	362.54	596.73	234.19	64.60%	107.41	196.92	334.17	465.45			

Bill at present rate was calculated using DSIC rate @ 0.00%

Bill at proposed rate was calculated using DSIC rate @ 0.00%

PENNSYLVANIA-AMERICAN WATER COMPANY
ZONE 6 - AUDUBON

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS (1)	BILLS UNDER		INCREASE		BILLS UNDER PROPOSED LOW INCOME RIDER				5/8-Meter All Usage	Present \$16.80 0.8619	Proposed \$ 20.00 1.1754
	PRESENT RATES (2)	PROPOSED RATES (3)	AMOUNT (4)	PERCENT (5)	Tier 1 82% (6)	Tier 2 67% (7)	Tier 3 44% (8)	Tier 4 22% (9)			
	0	\$16.80	\$20.00	\$3.20	19.05%	\$3.60	\$6.60	\$11.20			
100	17.66	21.18	3.51	19.89%	3.81	6.99	11.86	16.52			
500	21.11	25.88	4.77	22.58%	4.66	8.54	14.49	20.18	DSIC+EADIT	0.00%	0.00%
1,000	25.42	31.75	6.34	24.92%	5.72	10.48	17.78	24.77	STAS		
2,000	34.04	43.51	9.47	27.82%	7.83	14.36	24.36	33.94			
3,000	42.66	55.26	12.61	29.55%	9.95	18.24	30.95	43.10	DSIC	0.00%	
3,263	44.92	58.35	13.43	29.89%	10.50	19.26	32.68	45.52	EADIT	0.00%	
3,500	46.97	61.14	14.17	30.18%	11.01	20.18	34.24	47.69			
4,000	51.28	67.02	15.74	30.70%	12.06	22.12	37.53	52.27			
5,000	59.90	78.77	18.88	31.51%	14.18	25.99	44.11	61.44			
6,000	68.51	90.52	22.01	32.12%	16.29	29.87	50.69	70.61			
7,000	77.13	102.28	25.15	32.60%	18.41	33.75	57.28	79.78			
8,000	85.75	114.03	28.28	32.98%	20.53	37.63	63.86	88.94			
9,000	94.37	125.79	31.42	33.29%	22.64	41.51	70.44	98.11			
10,000	102.99	137.54	34.55	33.55%	24.76	45.39	77.02	107.28			
11,000	111.61	149.29	37.69	33.77%	26.87	49.27	83.60	116.45			
12,000	120.23	161.05	40.82	33.95%	28.99	53.15	90.19	125.62			
13,000	128.85	172.80	43.96	34.11%	31.10	57.02	96.77	134.79			
14,000	137.47	184.56	47.09	34.26%	33.22	60.90	103.35	143.95			
15,000	146.09	196.31	50.23	34.38%	35.34	64.78	109.93	153.12			
16,000	154.70	208.06	53.36	34.49%	37.45	68.66	116.52	162.29			
17,000	163.32	219.82	56.50	34.59%	39.57	72.54	123.10	171.46			
18,000	171.94	231.57	59.63	34.68%	41.68	76.42	129.68	180.63			
19,000	180.56	243.33	62.77	34.76%	43.80	80.30	136.26	189.79			
20,000	189.18	255.08	65.90	34.83%	45.91	84.18	142.84	198.96			
21,000	197.80	266.83	69.04	34.90%	48.03	88.06	149.43	208.13			
22,000	206.42	278.59	72.17	34.96%	50.15	91.93	156.01	217.30			
23,000	215.04	290.34	75.31	35.02%	52.26	95.81	162.59	226.47			
24,000	223.66	302.10	78.44	35.07%	54.38	99.69	169.17	235.63			
25,000	232.28	313.85	81.58	35.12%	56.49	103.57	175.76	244.80			

Bill at present rate was calculated using DSIC rate @ 0.00%
Bill at proposed rate was calculated using DSIC rate @ 0.00%

PENNSYLVANIA-AMERICAN WATER COMPANY
ZONE 7 - MANWALAMINK

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS (1)	BILLS UNDER		INCREASE		BILLS UNDER PROPOSED LOW INCOME RIDER				5/8-Meter All Usage	Present \$ 8.89	Proposed \$ 9.75
	PRESENT RATES (2)	PROPOSED RATES (3)	AMOUNT (4)	PERCENT (5)	Tier 1 82% (6)	Tier 2 67% (7)	Tier 3 44% (8)	Tier 4 22% (9)			
0	\$8.89	\$9.75	\$0.86	9.67%	\$1.76	\$3.22	\$5.46	\$7.61			
100	9.47	10.39	0.92	9.69%	1.87	3.43	5.82	8.10			
500	11.80	12.94	1.15	9.73%	2.33	4.27	7.25	10.10	DSIC+EADIT	0.00%	0.00%
1,000	14.70	16.14	1.44	9.76%	2.90	5.32	9.04	12.59	STAS		
2,000	20.51	22.52	2.01	9.80%	4.05	7.43	12.61	17.57			
3,000	26.32	28.91	2.59	9.82%	5.20	9.54	16.19	22.55	DSIC	0.00%	
3,263	27.85	30.58	2.74	9.83%	5.51	10.09	17.13	23.86	EADIT	0.00%	
3,500	29.23	32.10	2.87	9.83%	5.78	10.59	17.97	25.04			
4,000	32.13	35.29	3.16	9.84%	6.35	11.65	19.76	27.53			
5,000	37.94	41.68	3.74	9.84%	7.50	13.75	23.34	32.51			
6,000	43.75	48.06	4.31	9.85%	8.65	15.86	26.91	37.49			
7,000	49.56	54.45	4.89	9.86%	9.80	17.97	30.49	42.47			
8,000	55.37	60.83	5.46	9.86%	10.95	20.07	34.06	47.45			
9,000	61.18	67.22	6.04	9.86%	12.10	22.18	37.64	52.43			
10,000	66.99	73.60	6.61	9.87%	13.25	24.29	41.22	57.41			
11,000	72.80	79.99	7.19	9.87%	14.40	26.40	44.79	62.39			
12,000	78.61	86.37	7.76	9.87%	15.55	28.50	48.37	67.37			
13,000	84.42	92.76	8.34	9.87%	16.70	30.61	51.94	72.35			
14,000	90.23	99.14	8.91	9.87%	17.85	32.72	55.52	77.33			
15,000	96.04	105.53	9.49	9.88%	18.99	34.82	59.09	82.31			
16,000	101.85	111.91	10.06	9.88%	20.14	36.93	62.67	87.29			
17,000	107.66	118.30	10.64	9.88%	21.29	39.04	66.25	92.27			
18,000	113.47	124.68	11.21	9.88%	22.44	41.14	69.82	97.25			
19,000	119.28	131.07	11.79	9.88%	23.59	43.25	73.40	102.23			
20,000	125.09	137.45	12.36	9.88%	24.74	45.36	76.97	107.21			
21,000	130.90	143.84	12.94	9.88%	25.89	47.47	80.55	112.19			
22,000	136.71	150.22	13.51	9.88%	27.04	49.57	84.12	117.17			
23,000	142.52	156.61	14.09	9.88%	28.19	51.68	87.70	122.15			
24,000	148.33	162.99	14.66	9.88%	29.34	53.79	91.27	127.13			
25,000	154.14	169.38	15.24	9.88%	30.49	55.89	94.85	132.11			

Bill at present rate was calculated using DSIC rate @ 0.00%

Bill at proposed rate was calculated using DSIC rate @ 0.00%

PENNSYLVANIA-AMERICAN WATER COMPANY
ZONE 8 - APPALACHIAN

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS (1)	BILLS UNDER		INCREASE		BILLS UNDER PROPOSED LOW INCOME RIDER				Present Proposed	Present Proposed	
	PRESENT RATES (2)	PROPOSED RATES (3)	AMOUNT (4)	PERCENT (5)	Tier 1 82% (6)	Tier 2 67% (7)	Tier 3 44% (8)	Tier 4 22% (9)			
0	\$11.28	\$14.70	\$3.42	30.32%	\$2.65	\$4.85	\$8.23	\$11.47	5/8-Meter	\$ 11.28	\$ 14.70
100	12.04	15.65	3.61	30.01%	2.82	5.17	8.77	12.21	First 16,500, then 16,000	0.7600	0.9534
500	15.08	19.47	4.39	29.09%	3.50	6.42	10.90	15.18	First 16,500, then 16,000	0.3540	0.9534
1,000	18.88	24.23	5.35	28.36%	4.36	8.00	13.57	18.90			
2,000	26.48	33.77	7.29	27.52%	6.08	11.14	18.91	26.34			
3,000	34.08	43.30	9.22	27.06%	7.79	14.29	24.25	33.78	DSIC+EADIT	0.00%	0.00%
3,263	36.08	45.81	9.73	26.97%	8.25	15.12	25.65	35.73	STAS		
3,500	37.88	48.07	10.19	26.90%	8.65	15.86	26.92	37.49			
4,000	41.68	52.84	11.16	26.77%	9.51	17.44	29.59	41.21	DSIC	0.00%	
5,000	49.28	62.37	13.09	26.56%	11.23	20.58	34.93	48.65	EADIT	0.00%	
6,000	56.88	71.90	15.02	26.41%	12.94	23.73	40.27	56.09			
7,000	64.48	81.44	16.96	26.30%	14.66	26.87	45.61	63.52			
8,000	72.08	90.97	18.89	26.21%	16.37	30.02	50.94	70.96			
9,000	79.68	100.51	20.83	26.14%	18.09	33.17	56.28	78.39			
10,000	87.28	110.04	22.76	26.08%	19.81	36.31	61.62	85.83			
11,000	94.88	119.57	24.69	26.03%	21.52	39.46	66.96	93.27			
12,000	102.48	129.11	26.63	25.98%	23.24	42.61	72.30	100.70			
13,000	110.08	138.64	28.56	25.95%	24.96	45.75	77.64	108.14			
14,000	117.68	148.18	30.50	25.91%	26.67	48.90	82.98	115.58			
15,000	125.28	157.71	32.43	25.89%	28.39	52.04	88.32	123.01			
16,000	132.88	167.24	34.36	25.86%	30.10	55.19	93.66	130.45			
17,000	138.45	176.78	38.33	27.68%	31.82	58.34	99.00	137.89			
18,000	141.99	186.31	44.32	31.21%	33.54	61.48	104.33	145.32			
19,000	145.53	195.85	50.32	34.57%	35.25	64.63	109.67	152.76			
20,000	149.07	205.38	56.31	37.77%	36.97	67.78	115.01	160.20			
21,000	152.61	214.91	62.30	40.83%	38.68	70.92	120.35	167.63			
22,000	156.15	224.45	68.30	43.74%	40.40	74.07	125.69	175.07			
23,000	159.69	233.98	74.29	46.52%	42.12	77.21	131.03	182.51			
24,000	163.23	243.52	80.29	49.19%	43.83	80.36	136.37	189.94			
25,000	166.77	253.05	86.28	51.74%	45.55	83.51	141.71	197.38			

Bill at present rate was calculated using DSIC rate @ 0.00%
Bill at proposed rate was calculated using DSIC rate @ 0.00%

PENNSYLVANIA-AMERICAN WATER COMPANY
ZONE 9 - CORNER WATER

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS (1)	BILLS UNDER		INCREASE		BILLS UNDER PROPOSED LOW INCOME RIDER				5/8-Meter	Present \$	Proposed \$
	PRESENT RATES (2)	PROPOSED RATES (3)	AMOUNT (4)	PERCENT (5)	Tier 1 82% (6)	Tier 2 67% (7)	Tier 3 44% (8)	Tier 4 22% (9)			
0	\$16.88	\$20.00	\$3.12	18.48%	\$3.60	\$6.60	\$11.20	\$15.60	First 1,000 Gal	0.0000	0.3493
100	16.88	20.35	3.47	20.55%	3.66	6.72	11.40	15.87	Next 9,000 Gal	1.1510	1.3972
500	16.88	21.75	4.87	28.83%	3.91	7.18	12.18	16.96	Next 110,000 Gal	0.9870	1.3972
1,000	16.88	23.49	6.61	39.18%	4.23	7.75	13.16	18.32	DSIC+EADIT	0.00%	0.00%
2,000	28.39	37.47	9.08	31.97%	6.74	12.36	20.98	29.22	STAS		
3,000	39.90	51.44	11.54	28.91%	9.26	16.97	28.80	40.12			
3,263	42.93	55.11	12.18	28.38%	9.92	18.19	30.86	42.99	DSIC	0.00%	
3,500	45.66	58.42	12.77	27.97%	10.52	19.28	32.72	45.57	EADIT	0.00%	
4,000	51.41	65.41	14.00	27.23%	11.77	21.58	36.63	51.02			
5,000	62.92	79.38	16.46	26.16%	14.29	26.20	44.45	61.92			
6,000	74.43	93.35	18.92	25.42%	16.80	30.81	52.28	72.82			
7,000	85.94	107.33	21.39	24.88%	19.32	35.42	60.10	83.71			
8,000	97.45	121.30	23.85	24.47%	21.83	40.03	67.93	94.61			
9,000	108.96	135.27	26.31	24.15%	24.35	44.64	75.75	105.51			
10,000	120.47	149.24	28.77	23.88%	26.86	49.25	83.57	116.41			
11,000	130.34	163.21	32.87	25.22%	29.38	53.86	91.40	127.31			
12,000	140.21	177.19	36.98	26.37%	31.89	58.47	99.22	138.20			
13,000	150.08	191.16	41.08	27.37%	34.41	63.08	107.05	149.10			
14,000	159.95	205.13	45.18	28.25%	36.92	67.69	114.87	160.00			
15,000	169.82	219.10	49.28	29.02%	39.44	72.30	122.70	170.90			
16,000	179.69	233.07	53.38	29.71%	41.95	76.91	130.52	181.80			
17,000	189.56	247.05	57.49	30.33%	44.47	81.52	138.35	192.70			
18,000	199.43	261.02	61.59	30.88%	46.98	86.14	146.17	203.59			
19,000	209.30	274.99	65.69	31.39%	49.50	90.75	153.99	214.49			
20,000	219.17	288.96	69.79	31.84%	52.01	95.36	161.82	225.39			
21,000	229.04	302.93	73.89	32.26%	54.53	99.97	169.64	236.29			
22,000	238.91	316.91	78.00	32.65%	57.04	104.58	177.47	247.19			
23,000	248.78	330.88	82.10	33.00%	59.56	109.19	185.29	258.08			
24,000	258.65	344.85	86.20	33.33%	62.07	113.80	193.12	268.98			
25,000	268.52	358.82	90.30	33.63%	64.59	118.41	200.94	279.88			

Bill at present rate was calculated using DSIC rate @ 0.00%
Bill at proposed rate was calculated using DSIC rate @ 0.00%

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-027

Responsible Witness: Max McClellan, Lead, Regulatory Analyst

Question:

For PAWC's wastewater customers, please identify the financial impact of the proposed rate increase on each of the following customer segments, at different usage levels (1,000 gal; 2,000 gal; 3,000 gal; 6,000 gal; and 8,000 gal):

- a. residential customers,
- b. confirmed low income customers, and
- c. customers enrolled in PAWC's BDP.

Please provide a copy of any formal or informal assessment of specific rate impacts, and a live Excel spreadsheet with all formula intact of any workpapers or other documents used to perform the calculations contained in this response. If you are unable to identify the financial impact, or assert that there will be no impact, please explain. Please provide this information disaggregated by rate district.

Response:

- a. Please refer to Excel file CAUSE-PA 01-027_Attachment.xlsx for the bill impact of the proposed rate for residential wastewater customers.
- b. The impact on "confirmed low income customers" is dependent on whether or not the customer is enrolled in the BDP. Refer to the responses to parts a and c.
- c. Please refer to the attachment identified in response to subpart a, which includes the proposed average bills for customers enrolled in PAWC's BDP at the specified usage levels. These figures show what those customers would pay under the proposed rates, including BDP discounts.

PENNSYLVANIA-AMERICAN WATER COMPANY
WASTEWATER SSS OPERATIONS

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RATE ZONE 1 RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS	BILLS UNDER		INCREASE		BILLS UNDER LOW INCOME RIDER				Rate Zone 1		
	PRESENT RATES	PROPOSED RATES	AMOUNT	PERCENT	Tier 1 85%	Tier 2 73%	Tier 3 55%	Tier 4 37%	Customer Charge	Present \$	Proposed \$
0	\$15.14	\$20.00	\$4.86	32.07%	\$3.00	\$5.40	\$9.00	\$12.60		\$15.00	\$ 20.00
100	18.13	23.14	5.02	27.69%	3.47	6.25	10.42	14.58			
500	30.06	35.72	5.67	18.86%	5.36	9.65	16.08	22.51			
1,000	44.97	51.45	6.48	14.41%	7.72	13.89	23.15	32.41	DSIC	0.96%	0.00%
2,000	74.79	82.89	8.10	10.83%	12.43	22.38	37.30	52.22	EADIT	0.00%	0.00%
3,000	104.61	114.34	9.73	9.30%	17.15	30.87	51.45	72.03		0.96%	0.00%
3,164	109.50	119.50	9.99	9.13%	17.92	32.26	53.77	75.28			
3,500	119.52	130.06	10.54	8.82%	19.51	35.12	58.53	81.94			
4,000	134.43	145.78	11.35	8.44%	21.87	39.36	65.60	91.84			
5,000	164.26	177.23	12.97	7.90%	26.58	47.85	79.75	111.65			
6,000	194.08	208.68	14.60	7.52%	31.30	56.34	93.90	131.47			
7,000	223.90	240.12	16.22	7.24%	36.02	64.83	108.05	151.28			
8,000	253.72	271.57	17.84	7.03%	40.74	73.32	122.21	171.09			
9,000	283.55	303.01	19.47	6.87%	45.45	81.81	136.36	190.90			
10,000	313.37	334.46	21.09	6.73%	50.17	90.30	150.51	210.71			
11,000	343.19	365.91	22.71	6.62%	54.89	98.79	164.66	230.52			
12,000	373.01	397.35	24.34	6.52%	59.60	107.29	178.81	250.33			
13,000	402.84	428.80	25.96	6.44%	64.32	115.78	192.96	270.14			
14,000	432.66	460.24	27.58	6.38%	69.04	124.27	207.11	289.95			
15,000	462.48	491.69	29.21	6.32%	73.75	132.76	221.26	309.76			
16,000	492.31	523.14	30.83	6.26%	78.47	141.25	235.41	329.58			
17,000	522.13	554.58	32.45	6.22%	83.19	149.74	249.56	349.39			
18,000	551.95	586.03	34.08	6.17%	87.90	158.23	263.71	369.20			
19,000	581.77	617.47	35.70	6.14%	92.62	166.72	277.86	389.01			
20,000	611.60	648.92	37.32	6.10%	97.34	175.21	292.01	408.82			
21,000	641.42	680.37	38.95	6.07%	102.05	183.70	306.16	428.63			
22,000	671.24	711.81	40.57	6.04%	106.77	192.19	320.32	448.44			
23,000	701.06	743.26	42.19	6.02%	111.49	200.68	334.47	468.25			
24,000	730.89	774.70	43.82	6.00%	116.21	209.17	348.62	488.06			
25,000	760.71	806.15	45.44	5.97%	120.92	217.66	362.77	507.87			

Bill at present rate was calculated using DSIC rate @ 0.96%.
Bill at proposed rate was calculated using DSIC rate @ 0.00%.

PENNSYLVANIA-AMERICAN WATER COMPANY
WASTEWATER SSS OPERATIONS

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RATE ZONE 1a ROYERSFORD TOWNSHIP RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS	BILLS UNDER				BILLS UNDER LOW INCOME RIDER				Rate Zone 1a	Present	Proposed
	PRESENT RATES	PROPOSED RATES	INCREASE		Tier 1 85%	Tier 2 73%	Tier 3 55%	Tier 4 37%			
			AMOUNT	PERCENT							
0	\$15.14	\$20.00	\$4.86	32.07%	\$3.00	\$5.40	\$9.00	\$12.60	Customer Charge	\$15.00	\$20.00
100	16.57	22.03	5.46	32.95%	3.31	5.95	9.92	13.88	All Usage	1.4150	2.0334
500	22.29	30.17	7.88	35.36%	4.53	8.15	13.58	19.01	DSIC	0.96%	0.00%
1,000	29.43	40.33	10.90	37.05%	6.05	10.89	18.15	25.41	EADIT	0.00%	0.00%
2,000	43.72	60.67	16.95	38.78%	9.10	16.38	27.30	38.22		0.96%	0.00%
3,000	58.00	81.00	23.00	39.65%	12.15	21.87	36.45	51.03			
3,164	60.34	84.34	23.99	39.76%	12.65	22.77	37.95	53.13			
3,500	65.14	91.17	26.02	39.95%	13.68	24.62	41.03	57.44			
4,000	72.29	101.34	29.05	40.18%	15.20	27.36	45.60	63.84			
5,000	86.57	121.67	35.10	40.54%	18.25	32.85	54.75	76.65			
6,000	100.86	142.00	41.14	40.79%	21.30	38.34	63.90	89.46			
7,000	115.14	162.34	47.19	40.99%	24.35	43.83	73.05	102.27			
8,000	129.43	182.67	53.24	41.13%	27.40	49.32	82.20	115.08			
9,000	143.72	203.01	59.29	41.25%	30.45	54.81	91.35	127.89			
10,000	158.00	223.34	65.34	41.35%	33.50	60.30	100.50	140.70			
11,000	172.29	243.67	71.39	41.43%	36.55	65.79	109.65	153.51			
12,000	186.57	264.01	77.43	41.50%	39.60	71.28	118.80	166.33			
13,000	200.86	284.34	83.48	41.56%	42.65	76.77	127.95	179.14			
14,000	215.15	304.68	89.53	41.61%	45.70	82.26	137.10	191.95			
15,000	229.43	325.01	95.58	41.66%	48.75	87.75	146.25	204.76			
16,000	243.72	345.34	101.63	41.70%	51.80	93.24	155.40	217.57			
17,000	258.00	365.68	107.67	41.73%	54.85	98.73	164.56	230.38			
18,000	272.29	386.01	113.72	41.77%	57.90	104.22	173.71	243.19			
19,000	286.57	406.35	119.77	41.79%	60.95	109.71	182.86	256.00			
20,000	300.86	426.68	125.82	41.82%	64.00	115.20	192.01	268.81			
21,000	315.15	447.01	131.87	41.84%	67.05	120.69	201.16	281.62			
22,000	329.43	467.35	137.92	41.86%	70.10	126.18	210.31	294.43			
23,000	343.72	487.68	143.96	41.88%	73.15	131.67	219.46	307.24			
24,000	358.00	508.02	150.01	41.90%	76.20	137.16	228.61	320.05			
25,000	372.29	528.35	156.06	41.92%	79.25	142.65	237.76	332.86			

Bill at present rate was calculated using DSIC rate @ 0.96%.
Bill at proposed rate was calculated using DSIC rate @ 0.00%.

PENNSYLVANIA-AMERICAN WATER COMPANY
WASTEWATER SSS OPERATIONS

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RATE ZONE 1b YORK TOWNSHIP RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS	BILLS UNDER				BILLS UNDER LOW INCOME RIDER				Rate Zone 1b		
	PRESENT	PROPOSED	INCREASE		Tier 1	Tier 2	Tier 3	Tier 4	Customer Charge	Present	Proposed
	RATES	RATES	AMOUNT	PERCENT	85%	73%	55%	37%			
0	\$15.14	\$20.00	\$4.86	32.07%	\$3.00	\$5.40	\$9.00	\$12.60			
100	15.90	21.73	5.83	36.68%	3.26	5.87	9.78	13.69			
500	18.93	28.67	9.74	51.47%	4.30	7.74	12.90	18.06			
1,000	22.72	37.35	14.63	64.40%	5.60	10.08	16.81	23.53			
2,000	30.29	54.69	24.40	80.57%	8.20	14.77	24.61	34.45			
3,000	60.11	86.14	26.03	43.30%	12.92	23.26	38.76	54.27			
3,164	65.00	91.29	26.29	40.45%	13.69	24.65	41.08	57.51			
3,500	75.02	101.86	26.84	35.77%	15.28	27.50	45.84	64.17			
4,000	89.93	117.58	27.65	30.74%	17.64	31.75	52.91	74.08			
5,000	119.76	149.03	29.27	24.44%	22.35	40.24	67.06	93.89			
6,000	149.58	180.47	30.90	20.66%	27.07	48.73	81.21	113.70			
7,000	179.40	211.92	32.52	18.13%	31.79	57.22	95.36	133.51			
8,000	209.22	243.37	34.14	16.32%	36.50	65.71	109.51	153.32			
9,000	239.05	274.81	35.77	14.96%	41.22	74.20	123.67	173.13			
10,000	268.87	306.26	37.39	13.91%	45.94	82.69	137.82	192.94			
11,000	298.69	337.70	39.01	13.06%	50.66	91.18	151.97	212.75			
12,000	328.51	369.15	40.64	12.37%	55.37	99.67	166.12	232.56			
13,000	358.34	400.60	42.26	11.79%	60.09	108.16	180.27	252.38			
14,000	388.16	432.04	43.88	11.31%	64.81	116.65	194.42	272.19			
15,000	417.98	463.49	45.51	10.89%	69.52	125.14	208.57	292.00			
16,000	447.80	494.93	47.13	10.52%	74.24	133.63	222.72	311.81			
17,000	477.63	526.38	48.75	10.21%	78.96	142.12	236.87	331.62			
18,000	507.45	557.83	50.38	9.93%	83.67	150.61	251.02	351.43			
19,000	537.27	589.27	52.00	9.68%	88.39	159.10	265.17	371.24			
20,000	567.09	620.72	53.62	9.46%	93.11	167.59	279.32	391.05			
21,000	596.92	652.16	55.25	9.26%	97.82	176.08	293.47	410.86			
22,000	626.74	683.61	56.87	9.07%	102.54	184.57	307.62	430.67			
23,000	656.56	715.06	58.49	8.91%	107.26	193.07	321.78	450.49			
24,000	686.38	746.50	60.12	8.76%	111.98	201.56	335.93	470.30			
25,000	716.21	777.95	61.74	8.62%	116.69	210.05	350.08	490.11			

Bill at present rate was calculated using DSIC rate @ 0.96%.
Bill at proposed rate was calculated using DSIC rate @ 0.00%.

PENNSYLVANIA-AMERICAN WATER COMPANY
WASTEWATER SSS OPERATIONS

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RATE ZONE 1c FOSTER TOWNSHIP RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS	BILLS UNDER				BILLS UNDER LOW INCOME RIDER				Rate Zone 1c		
	PRESENT RATES	PROPOSED RATES	INCREASE		Tier 1 85%	Tier 2 73%	Tier 3 55%	Tier 4 37%	Customer Charge	Present	Proposed
			AMOUNT	PERCENT					All Usage	\$110.00	\$120.00
0	\$111.06	\$120.00	\$8.94	8.05%	\$18.00	\$32.40	\$54.00	\$75.60			
100	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
500	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60	DSIC	0.96%	0.00%
1,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60	EADIT	0.00%	0.00%
2,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60		0.96%	0.00%
3,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
3,164	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
3,500	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
4,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
5,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
6,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
7,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
8,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
9,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
10,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
11,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
12,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
13,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
14,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
15,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
16,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
17,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
18,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
19,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
20,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
21,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
22,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
23,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
24,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			
25,000	111.06	120.00	8.94	8.05%	18.00	32.40	54.00	75.60			

Bill at present rate was calculated using DSIC rate @ 0.96%.
Bill at proposed rate was calculated using DSIC rate @ 0.00%.

PENNSYLVANIA-AMERICAN WATER COMPANY
WASTEWATER SSS OPERATIONS

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RATE ZONE 1e SADSBUURY RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS	BILLS UNDER		INCREASE		BILLS UNDER LOW INCOME RIDER				Rate Zone 1e		
	PRESENT RATES	PROPOSED RATES	AMOUNT	PERCENT	Tier 1 85%	Tier 2 73%	Tier 3 55%	Tier 4 37%	Customer Charge	Present	Proposed
0	\$128.33	\$128.33	\$0.00	0.00%	\$19.25	\$34.65	\$57.75	\$80.85		\$128.33	\$ 128.33
100	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
500	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85	DSIC	0.00%	0.00%
1,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85	EADIT	0.00%	0.00%
2,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85		0.00%	0.00%
3,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
3,164	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
3,500	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
4,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
5,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
6,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
7,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
8,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
9,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
10,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
11,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
12,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
13,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
14,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
15,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
16,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
17,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
18,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
19,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
20,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
21,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
22,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
23,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
24,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			
25,000	128.33	128.33	0.00	0.00%	19.25	34.65	57.75	80.85			

Bill at present rate was calculated using DSIC rate @ 0.96%.
Bill at proposed rate was calculated using DSIC rate @ 0.00%.

PENNSYLVANIA-AMERICAN WATER COMPANY
WASTEWATER SSS OPERATIONS

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RATE ZONE 1f FARMINGTON RESIDENTIAL - MONTHLY
1 EDU PER 4000 GALLONS to 5/8 INCH METERS

CONSUMPTION GALLONS	BILLS UNDER				BILLS UNDER LOW INCOME RIDER				Rate Zone 1f		
	PRESENT RATES	PROPOSED RATES	INCREASE		Tier 1	Tier 2	Tier 3	Tier 4	Customer Charge	Present	Proposed
			AMOUNT	PERCENT	85%	73%	55%	37%			
0	\$53.50	\$20.00	(\$33.50)	-62.62%	\$3.00	\$5.40	\$9.00	\$12.60		\$53.50	\$ 20.00
100	53.50	21.73	(31.77)	-59.37%	3.26	5.87	9.78	13.69			
500	53.50	28.67	(24.83)	-46.41%	4.30	7.74	12.90	18.06			
1,000	53.50	37.35	(16.16)	-30.20%	5.60	10.08	16.81	23.53	DSIC	0.00%	0.00%
2,000	53.50	54.69	1.19	2.22%	8.20	14.77	24.61	34.45	EADIT	0.00%	0.00%
3,000	53.50	72.04	18.54	34.64%	10.81	19.45	32.42	45.38		0.00%	0.00%
3,164	53.50	74.88	21.38	39.96%	11.23	20.22	33.70	47.17			
3,500	53.50	80.71	27.21	50.86%	12.11	21.79	36.32	50.85			
4,000	53.50	89.38	35.88	67.07%	13.41	24.13	40.22	56.31			
5,000	53.50	106.73	53.23	99.49%	16.01	28.82	48.03	67.24			
6,000	53.50	124.07	70.57	131.91%	18.61	33.50	55.83	78.16			
7,000	53.50	141.42	87.92	164.33%	21.21	38.18	63.64	89.09			
8,000	107.00	158.76	51.76	48.37%	23.81	42.87	71.44	100.02			
9,000	107.00	176.11	69.11	64.58%	26.42	47.55	79.25	110.95			
10,000	107.00	193.45	86.45	80.79%	29.02	52.23	87.05	121.87			
11,000	107.00	210.80	103.80	97.00%	31.62	56.91	94.86	132.80			
12,000	160.50	228.14	67.64	42.14%	34.22	61.60	102.66	143.73			
13,000	160.50	245.49	84.99	52.95%	36.82	66.28	110.47	154.66			
14,000	160.50	262.83	102.33	63.76%	39.42	70.96	118.27	165.58			
15,000	160.50	280.18	119.68	74.56%	42.03	75.65	126.08	176.51			
16,000	214.00	297.52	83.52	39.03%	44.63	80.33	133.88	187.44			
17,000	214.00	314.87	100.87	47.13%	47.23	85.01	141.69	198.36			
18,000	214.00	332.21	118.21	55.24%	49.83	89.70	149.49	209.29			
19,000	214.00	349.56	135.56	63.34%	52.43	94.38	157.30	220.22			
20,000	267.50	366.90	99.40	37.16%	55.04	99.06	165.11	231.15			
21,000	267.50	384.25	116.75	43.64%	57.64	103.75	172.91	242.07			
22,000	267.50	401.59	134.09	50.13%	60.24	108.43	180.72	253.00			
23,000	267.50	418.94	151.44	56.61%	62.84	113.11	188.52	263.93			
24,000	321.00	436.28	115.28	35.91%	65.44	117.80	196.33	274.86			
25,000	321.00	453.63	132.63	41.32%	68.04	122.48	204.13	285.78			

Bill at present rate was calculated using DSIC rate @ 0.96%.
Bill at proposed rate was calculated using DSIC rate @ 0.00%.

PENNSYLVANIA-AMERICAN WATER COMPANY
WASTEWATER SSS OPERATIONS

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RATE ZONE 1g MANWALAMINK RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS	BILLS UNDER				BILLS UNDER LOW INCOME RIDER				Rate Zone 1g		
	PRESENT RATES	PROPOSED RATES	INCREASE		Tier 1 85%	Tier 2 73%	Tier 3 55%	Tier 4 37%	Present	Proposed	
			AMOUNT	PERCENT							
0	\$16.92	\$18.60	\$1.68	9.93%	\$2.79	\$5.02	\$8.37	\$11.72	Customer Charge	\$ 16.92	\$ 18.60
100	17.58	19.32	1.75	9.93%	2.90	5.22	8.70	12.17	First 10,000 g	0.6590	0.7240
500	20.22	22.22	2.01	9.92%	3.33	6.00	10.00	14.00	Over 10,000 g	0.2530	0.2780
1,000	23.51	25.84	2.33	9.91%	3.88	6.98	11.63	16.28	DSIC	0.00%	0.00%
2,000	30.10	33.08	2.98	9.90%	4.96	8.93	14.89	20.84	EADIT	0.00%	0.00%
3,000	36.69	40.32	3.63	9.89%	6.05	10.89	18.14	25.40			
3,164	37.77	41.51	3.74	9.89%	6.23	11.21	18.68	26.15			
3,500	39.99	43.94	3.96	9.89%	6.59	11.86	19.77	27.68			
4,000	43.28	47.56	4.28	9.89%	7.13	12.84	21.40	29.96			
5,000	49.87	54.80	4.93	9.89%	8.22	14.80	24.66	34.52			
6,000	56.46	62.04	5.58	9.88%	9.31	16.75	27.92	39.09			
7,000	63.05	69.28	6.23	9.88%	10.39	18.71	31.18	43.65			
8,000	69.64	76.52	6.88	9.88%	11.48	20.66	34.43	48.21			
9,000	76.23	83.76	7.53	9.88%	12.56	22.62	37.69	52.77			
10,000	82.82	91.00	8.18	9.88%	13.65	24.57	40.95	57.33			
11,000	85.35	93.53	8.18	9.58%	14.03	25.25	42.09	58.92			
12,000	87.88	96.06	8.18	9.31%	14.41	25.94	43.23	60.52			
13,000	90.41	98.59	8.18	9.05%	14.79	26.62	44.37	62.11			
14,000	92.94	101.12	8.18	8.80%	15.17	27.30	45.50	63.71			
15,000	95.47	103.65	8.18	8.57%	15.55	27.99	46.64	65.30			
16,000	98.00	106.18	8.18	8.35%	15.93	28.67	47.78	66.89			
17,000	100.53	108.71	8.18	8.14%	16.31	29.35	48.92	68.49			
18,000	103.06	111.24	8.18	7.94%	16.69	30.03	50.06	70.08			
19,000	105.59	113.77	8.18	7.75%	17.07	30.72	51.20	71.68			
20,000	108.12	116.30	8.18	7.57%	17.45	31.40	52.34	73.27			
21,000	110.65	118.83	8.18	7.39%	17.82	32.08	53.47	74.86			
22,000	113.18	121.36	8.18	7.23%	18.20	32.77	54.61	76.46			
23,000	115.71	123.89	8.18	7.07%	18.58	33.45	55.75	78.05			
24,000	118.24	126.42	8.18	6.92%	18.96	34.13	56.89	79.64			
25,000	120.77	128.95	8.18	6.77%	19.34	34.82	58.03	81.24			

Bill at present rate was calculated using DSIC rate @ 0.96%.
Bill at proposed rate was calculated using DSIC rate @ 0.00%.

PENNSYLVANIA-AMERICAN WATER COMPANY
WASTEWATER CSS OPERATIONS

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
ZONE 2 RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS	BILLS UNDER				BILLS UNDER LOW INCOME RIDER				ZONE 2 RESIDENTIAL - MONTHLY		
	PRESENT RATES	PROPOSED RATES	INCREASE		Tier 1	Tier 2	Tier 3	Tier 4	Present	Proposed	
			AMOUNT	PERCENT	85%	73%	55%	37%	Customer (\$	\$
0	\$20.19	\$25.00	\$4.81	23.81%	\$3.75	\$6.75	\$11.25	\$15.75	All Usage	2.6117	3.1340
100	22.83	28.13	5.31	23.24%	4.22	7.60	12.66	17.72			
500	33.38	40.67	7.29	21.85%	6.10	10.98	18.30	25.62			
1,000	46.56	56.34	9.78	21.01%	8.45	15.21	25.35	35.49			
2,000	72.93	87.68	14.75	20.23%	13.15	23.67	39.46	55.24			
3,000	99.30	119.02	19.72	19.86%	17.85	32.14	53.56	74.98			
3,164	103.62	124.16	20.54	19.82%	18.62	33.52	55.87	78.22			
3,500	112.48	134.69	22.21	19.75%	20.20	36.37	60.61	84.85	DSIC	0.96%	0.00%
4,000	125.66	150.36	24.70	19.65%	22.55	40.60	67.66	94.73	EADIT	0.00%	0.00%
5,000	152.03	181.70	29.67	19.52%	27.26	49.06	81.77	114.47		0.96%	0.00%
6,000	178.40	213.04	34.64	19.42%	31.96	57.52	95.87	134.22			
7,000	204.77	244.38	39.61	19.35%	36.66	65.98	109.97	153.96			
8,000	231.13	275.72	44.59	19.29%	41.36	74.44	124.07	173.70			
9,000	257.50	307.06	49.56	19.25%	46.06	82.91	138.18	193.45			
10,000	283.87	338.40	54.53	19.21%	50.76	91.37	152.28	213.19			
11,000	310.24	369.74	59.50	19.18%	55.46	99.83	166.38	232.94			
12,000	336.60	401.08	64.48	19.15%	60.16	108.29	180.49	252.68			
13,000	362.97	432.42	69.45	19.13%	64.86	116.75	194.59	272.42			
14,000	389.34	463.76	74.42	19.11%	69.56	125.22	208.69	292.17			
15,000	415.71	495.10	79.39	19.10%	74.27	133.68	222.80	311.91			
16,000	442.08	526.44	84.36	19.08%	78.97	142.14	236.90	331.66			
17,000	468.44	557.78	89.34	19.07%	83.67	150.60	251.00	351.40			
18,000	494.81	589.12	94.31	19.06%	88.37	159.06	265.10	371.15			
19,000	521.18	620.46	99.28	19.05%	93.07	167.52	279.21	390.89			
20,000	547.55	651.80	104.25	19.04%	97.77	175.99	293.31	410.63			
21,000	573.91	683.14	109.23	19.03%	102.47	184.45	307.41	430.38			
22,000	600.28	714.48	114.20	19.02%	107.17	192.91	321.52	450.12			
23,000	626.65	745.82	119.17	19.02%	111.87	201.37	335.62	469.87			
24,000	653.02	777.16	124.14	19.01%	116.57	209.83	349.72	489.61			
25,000	679.39	808.50	129.11	19.00%	121.28	218.30	363.83	509.36			

Bill at present rate was calculated using DSIC rate @ 0.96%
Bill at proposed rate was calculated using DSIC rate @ 0.00%

PENNSYLVANIA-AMERICAN WATER COMPANY
WASTEWATER CSS OPERATIONS SCRANTON

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
ZONE 2a SCRANTON RESIDENTIAL - MONTHLY
5/8 INCH METERS

CONSUMPTION GALLONS	BILLS UNDER		INCREASE		BILLS UNDER LOW INCOME RIDER				ZONE 2a SCRANTON RESIDENTIAL - MONTHLY		
	PRESENT	PROPOSED	AMOUNT	PERCENT	Tier 1	Tier 2	Tier 3	Tier 4	Present	Proposed	
	RATES	RATES			85%	73%	55%	37%	Customer (\$ 20.00	\$ 20.19
0	\$20.19	\$20.19	(\$0.00)	-0.01%	\$3.03	\$5.45	\$9.09	\$12.72	All Usage	2.6117	2.6368
100	22.83	22.83	(0.00)	-0.01%	3.42	6.16	10.27	14.38			
500	33.38	33.37	(0.00)	-0.01%	5.01	9.01	15.02	21.03			
1,000	46.56	46.56	(0.00)	0.00%	6.98	12.57	20.95	29.33			
2,000	72.93	72.93	(0.00)	0.00%	10.94	19.69	32.82	45.94			
3,000	99.30	99.29	(0.00)	0.00%	14.89	26.81	44.68	62.56			
3,164	103.62	103.62	(0.00)	0.00%	15.54	27.98	46.63	65.28			
3,500	112.48	112.48	(0.00)	0.00%	16.87	30.37	50.62	70.86	DSIC	0.96%	0.00%
4,000	125.66	125.66	(0.00)	0.00%	18.85	33.93	56.55	79.17	EADIT	0.00%	
5,000	152.03	152.03	(0.00)	0.00%	22.80	41.05	68.41	95.78		0.96%	
6,000	178.40	178.40	(0.00)	0.00%	26.76	48.17	80.28	112.39			
7,000	204.77	204.77	(0.00)	0.00%	30.71	55.29	92.14	129.00			
8,000	231.13	231.13	0.00	0.00%	34.67	62.41	104.01	145.61			
9,000	257.50	257.50	0.00	0.00%	38.63	69.53	115.88	162.23			
10,000	283.87	283.87	0.00	0.00%	42.58	76.64	127.74	178.84			
11,000	310.24	310.24	0.00	0.00%	46.54	83.76	139.61	195.45			
12,000	336.60	336.61	0.00	0.00%	50.49	90.88	151.47	212.06			
13,000	362.97	362.97	0.00	0.00%	54.45	98.00	163.34	228.67			
14,000	389.34	389.34	0.00	0.00%	58.40	105.12	175.20	245.29			
15,000	415.71	415.71	0.00	0.00%	62.36	112.24	187.07	261.90			
16,000	442.08	442.08	0.00	0.00%	66.31	119.36	198.94	278.51			
17,000	468.44	468.45	0.00	0.00%	70.27	126.48	210.80	295.12			
18,000	494.81	494.81	0.00	0.00%	74.22	133.60	222.67	311.73			
19,000	521.18	521.18	0.00	0.00%	78.18	140.72	234.53	328.34			
20,000	547.55	547.55	0.00	0.00%	82.13	147.84	246.40	344.96			
21,000	573.91	573.92	0.00	0.00%	86.09	154.96	258.26	361.57			
22,000	600.28	600.29	0.00	0.00%	90.04	162.08	270.13	378.18			
23,000	626.65	626.65	0.00	0.00%	94.00	169.20	281.99	394.79			
24,000	653.02	653.02	0.00	0.00%	97.95	176.32	293.86	411.40			
25,000	679.39	679.39	0.00	0.00%	101.91	183.44	305.73	428.02			

Bill at present rate was calculated using DSIC rate @ 0.96%
Bill at proposed rate was calculated using DSIC rate @ 0.00%

PENNSYLVANIA-AMERICAN WATER COMPANY
BASA WW OPERATIONS

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RESIDENTIAL - MONTHLY
1 EDU PER 4000 GALLONS to 5/8 INCH METERS

CONSUMPTION GALLONS	BILLS UNDER				BILLS UNDER LOW INCOME RIDER				Customer Charge Usage Charge DSIC	Present \$45.50 0.96%	Proposed 20.00 \$1.6058 0.00%
	PRESENT RATES	PROPOSED RATES	INCREASE		Tier 1 85%	Tier 2 73%	Tier 3 55%	Tier 4 37%			
			AMOUNT	PERCENT							
0	\$45.94	\$20.00	(\$25.94)	-56.46%	\$3.00	\$5.40	\$9.00	\$12.60			
100	45.94	21.61	(24.33)	-52.97%	3.24	5.83	9.72	13.61			
500	45.94	28.03	(17.91)	-38.98%	4.20	7.57	12.61	17.66			
1,000	45.94	36.06	(9.88)	-21.51%	5.41	9.74	16.23	22.72			
2,000	45.94	52.12	6.18	13.45%	7.82	14.07	23.45	32.83			
3,000	45.94	68.17	22.24	48.41%	10.23	18.41	30.68	42.95			
3,164	45.94	70.81	24.87	54.14%	10.62	19.12	31.86	44.61			
3,500	45.94	76.20	30.27	65.89%	11.43	20.57	34.29	48.01			
4,000	45.94	84.23	38.30	83.36%	12.63	22.74	37.90	53.07			
5,000	45.94	100.29	54.35	118.32%	15.04	27.08	45.13	63.18			
6,000	45.94	116.35	70.41	153.28%	17.45	31.41	52.36	73.30			
7,000	45.94	132.41	86.47	188.24%	19.86	35.75	59.58	83.42			
8,000	91.87	148.46	56.59	61.60%	22.27	40.09	66.81	93.53			
9,000	91.87	164.52	72.65	79.07%	24.68	44.42	74.03	103.65			
10,000	91.87	180.58	88.71	96.55%	27.09	48.76	81.26	113.77			
11,000	91.87	196.64	104.76	114.03%	29.50	53.09	88.49	123.88			
12,000	137.81	212.70	74.89	54.34%	31.90	57.43	95.71	134.00			
13,000	137.81	228.75	90.94	65.99%	34.31	61.76	102.94	144.12			
14,000	137.81	244.81	107.00	77.64%	36.72	66.10	110.17	154.23			
15,000	137.81	260.87	123.06	89.30%	39.13	70.43	117.39	164.35			
16,000	183.75	276.93	93.18	50.71%	41.54	74.77	124.62	174.46			
17,000	183.75	292.99	109.24	59.45%	43.95	79.11	131.84	184.58			
18,000	183.75	309.04	125.30	68.19%	46.36	83.44	139.07	194.70			
19,000	183.75	325.10	141.35	76.93%	48.77	87.78	146.30	204.81			
20,000	229.68	341.16	111.48	48.53%	51.17	92.11	153.52	214.93			
21,000	229.68	357.22	127.53	55.53%	53.58	96.45	160.75	225.05			
22,000	229.68	373.28	143.59	62.52%	55.99	100.78	167.97	235.16			
22,561	229.68	382.28	152.60	66.44%	57.34	103.22	172.03	240.84			
23,000	229.68	389.33	159.65	69.51%	58.40	105.12	175.20	245.28			
24,000	275.62	405.39	129.77	47.08%	60.81	109.46	182.43	255.40			
25,000	275.62	421.45	145.83	52.91%	63.22	113.79	189.65	265.51			
50,000	551.24	822.90	271.66	49.28%	123.44	222.18	370.31	518.43			

PENNSYLVANIA-AMERICAN WATER COMPANY
ELIZABETH BOROUGH WW CSS OPERATIONS

COMPARISON OF BILLS UNDER PRESENT AND PROPOSED RATES
RESIDENTIAL - MONTHLY
ALL METER SIZES

CONSUMPTION GALLONS	BILLS UNDER		INCREASE		BILLS UNDER LOW INCOME RIDER				Residential Customer Charge Usage Charge	Present	Proposed
	PRESENT RATES	PROPOSED RATES	AMOUNT	PERCENT	Tier 1 85%	Tier 2 73%	Tier 3 55%	Tier 4 37%			
0	\$35.00	\$35.00	\$0.00	0.00%	\$5.25	\$9.45	\$15.75	\$22.05		\$35.00	\$35.00
100	35.80	36.34	\$0.54	1.51%	5.45	9.81	16.35	22.89			
500	39.00	41.71	\$2.71	6.94%	6.26	11.26	18.77	26.27	DSIC	0.00%	0.00%
1,000	43.00	48.41	\$5.41	12.59%	7.26	13.07	21.79	30.50			
2,000	51.00	61.82	\$10.82	21.22%	9.27	16.69	27.82	38.95			
3,000	59.00	75.24	\$16.24	27.52%	11.29	20.31	33.86	47.40			
3,164	60.31	77.44	\$17.12	28.39%	11.62	20.91	34.85	48.78			
3,500	63.00	81.94	\$18.94	30.07%	12.29	22.12	36.87	51.62			
4,000	67.00	88.65	\$21.65	32.31%	13.30	23.94	39.89	55.85			
4,500	71.00	95.36	\$24.36	34.30%	14.30	25.75	42.91	60.07			
5,500	79.00	108.77	\$29.77	37.68%	16.32	29.37	48.95	68.52			
6,500	87.00	122.18	\$35.18	40.44%	18.33	32.99	54.98	76.97			
7,500	95.00	135.59	\$40.59	42.73%	20.34	36.61	61.02	85.42			
8,500	103.00	149.00	\$46.00	44.66%	22.35	40.23	67.05	93.87			
9,500	111.00	162.42	\$51.42	46.32%	24.36	43.85	73.09	102.32			
10,000	115.00	169.12	\$54.12	47.06%	25.37	45.66	76.11	106.55			
11,000	123.00	182.54	\$59.54	48.40%	27.38	49.28	82.14	115.00			
12,000	131.00	195.95	\$64.95	49.58%	29.39	52.91	88.18	123.45			
13,000	139.00	209.36	\$70.36	50.62%	31.40	56.53	94.21	131.90			
14,000	147.00	222.77	\$75.77	51.55%	33.42	60.15	100.25	140.35			
15,000	155.00	236.18	\$81.18	52.38%	35.43	63.77	106.28	148.80			
16,000	163.00	249.60	\$86.60	53.13%	37.44	67.39	112.32	157.25			
17,000	171.00	263.01	\$92.01	53.81%	39.45	71.01	118.35	165.70			
18,000	179.00	276.42	\$97.42	54.43%	41.46	74.63	124.39	174.15			
19,000	187.00	289.83	\$102.83	54.99%	43.48	78.26	130.43	182.60			
20,000	195.00	303.25	\$108.25	55.51%	45.49	81.88	136.46	191.04			
21,000	203.00	316.66	\$113.66	55.99%	47.50	85.50	142.50	199.49			
22,000	211.00	330.07	\$119.07	56.43%	49.51	89.12	148.53	207.94			
23,000	219.00	343.48	\$124.48	56.84%	51.52	92.74	154.57	216.39			
24,000	227.00	356.89	\$129.89	57.22%	53.53	96.36	160.60	224.84			
25,000	235.00	370.31	\$135.31	57.58%	55.55	99.98	166.64	233.29			
30,000	275.00	437.37	\$162.37	59.04%	65.61	118.09	196.82	275.54			

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-028

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

From January 2023 to present, how many residential customers were terminated for nonpayment? Please disaggregate this data by service type (i.e. water only, wastewater only, combined), month, and year as of the last day of the month/year.

If this data is unavailable as of the last day of the month/ year, please provide this data, disaggregated as requested, and specify at which point in the month/year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

Please refer to CAUSE-PA 01-028_Attachment.

CAUSE-PA 01-028_Attachment

Water Only		Wasterwater Only		Combined	
Year and Month	Residential customers terminated for nonpayment	Year and Month	Residential customers terminated for nonpayment	Year and Month	Residential customers terminated for nonpayment
202301	715	202301	30	202301	158
202302	378	202302	17	202302	104
202303	357	202303	45	202303	142
202304	1,051	202304	97	202304	291
202305	1,270	202305	109	202305	484
202306	1,500	202306	100	202306	496
202307	1,162	202307	78	202307	459
202308	1,724	202308	71	202308	476
202309	874	202309	31	202309	295
202310	857	202310	3	202310	248
202311	1,205	202311	1	202311	347
202312	337	202312	0	202312	126
202401	511	202401	0	202401	177
202402	418	202402	15	202402	120
202403	467	202403	50	202403	163
202404	1,527	202404	63	202404	504
202405	1,710	202405	47	202405	471
202406	1,387	202406	32	202406	386
202407	1,649	202407	11	202407	469
202408	1,062	202408	15	202408	356
202409	879	202409	14	202409	302
202410	138	202410	0	202410	45
202411	0	202411	0	202411	0
202412	110	202412	0	202412	13
202501	590	202501	10	202501	100
202502	391	202502	14	202502	115
202503	479	202503	52	202503	211
202504	1,497	202504	46	202504	466
202505	1,297	202505	45	202505	431
202506	1,308	202506	64	202506	396
202507	1,491	202507	55	202507	514
202508	1,600	202508	85	202508	488
202509	1,440	202509	81	202509	479
202510	1,597	202510	58	202510	550
202511	973	202511	46	202511	208

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**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-030

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

From January 2023 to present, how many confirmed low income customers were terminated for nonpayment? Please disaggregate this data by service type (i.e. water only, wastewater only, combined), month, and year as of the last day of the month/year.

If this data is unavailable as of the last day of the month/ year, please provide this data, disaggregated as requested, and specify at which point in the month/year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

Please refer to CAUSE-PA 01-030_Attachment.

Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)

CAUSE-PA 01-030_Attachment

Water Only		Wastewater Only		Combined	
Year and Month	Low Income customers terminated for nonpayment	Year and Month	Low Income customers terminated for nonpayment	Year and Month	Low Income customers terminated for nonpayment
202301	412	202301	17	202301	94
202302	214	202302	9	202302	58
202303	209	202303	14	202303	75
202304	605	202304	26	202304	179
202305	707	202305	39	202305	272
202306	852	202306	46	202306	309
202307	649	202307	43	202307	263
202308	959	202308	43	202308	262
202309	477	202309	22	202309	167
202310	504	202310	2	202310	153
202311	659	202311	1	202311	187
202312	206	202402	11	202312	77
202401	315	202403	34	202401	108
202402	246	202404	37	202402	63
202403	281	202405	31	202403	81
202404	801	202406	22	202404	268
202405	872	202407	5	202405	259
202406	759	202408	9	202406	222
202407	902	202409	8	202407	259
202408	595	202408	0	202408	235
202409	512	202409	0	202409	179
202410	66	202410	0	202410	31
202411	0	202411	0	202411	0
202412	69	202412	0	202412	8
202501	364	202501	7	202501	57
202502	230	202502	8	202502	64
202503	227	202503	23	202503	122
202504	809	202504	24	202504	249
202505	711	202505	22	202505	264
202506	717	202506	46	202506	215
202507	891	202507	29	202507	311
202508	978	202508	57	202508	304
202509	798	202509	56	202509	277
202510	944	202510	39	202510	329
202511	589	202511	33	202511	128

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-034

Responsible Witness: Matthew Prine, Vice President and Chief Customer Office

Question:

From January 2023 to present, please provide the median and mean arrearages, disaggregated by month and year, as of the last day of the month, for each of the following groups:

- a. All residential customers;
- b. Residential customers, excluding confirmed low income customers;
- c. Confirmed low income customers;
- d. Confirmed low income customers, excluding H2O program participants; and
- e. H2O program participants.

If this data is unavailable as of the last day of the month/ year, please provide this data, disaggregated as requested, and specify at which point in the month/year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

Please refer to CAUSE-PA 01-034_Attachment.

CAUSE-PA St. 1, Appendix B
Cited Discovery Responses

CAUSE-PA 01-034_Attachment

Month	A. All residential customers		B. Residential customers, excluding confirmed low income customers		C. Confirmed low income customers		D. Confirmed low income customers, excluding H2O program participants		E. H2O program participants	
	Mean	Median	Mean	Median	Mean	Median	Mean	Median	Mean	Median
	Customer Arrearages									
202301	\$233.75	\$90.64	\$127.27	\$74.12	\$471.13	\$161.60	\$413.44	\$134.04	\$400.19	\$144.14
202302	\$233.35	\$93.37	\$133.60	\$77.53	\$479.49	\$162.46	\$418.40	\$135.94	\$419.27	\$152.04
202303	\$245.89	\$96.18	\$141.72	\$78.97	\$500.17	\$176.95	\$441.76	\$153.07	\$401.60	\$137.70
202304	\$243.90	\$100.00	\$140.11	\$81.93	\$484.31	\$176.04	\$436.78	\$151.97	\$405.70	\$152.64
202305	\$237.84	\$106.11	\$142.86	\$90.66	\$474.47	\$181.56	\$416.59	\$165.82	\$401.56	\$143.32
202306	\$240.15	\$104.20	\$140.81	\$85.17	\$468.82	\$183.46	\$405.44	\$162.07	\$407.26	\$151.65
202307	\$251.26	\$112.56	\$148.55	\$90.80	\$473.40	\$194.50	\$414.11	\$173.04	\$405.57	\$156.10
202308	\$248.01	\$108.02	\$142.75	\$87.84	\$485.28	\$198.23	\$427.36	\$176.70	\$417.00	\$158.46
202309	\$248.64	\$106.09	\$141.80	\$84.18	\$481.87	\$196.96	\$428.51	\$175.62	\$403.25	\$155.70
202310	\$248.83	\$110.60	\$147.40	\$89.99	\$476.51	\$202.51	\$429.85	\$181.68	\$398.74	\$162.32
202311	\$246.91	\$104.02	\$139.99	\$82.59	\$487.13	\$197.68	\$435.25	\$175.32	\$419.11	\$161.88
202312	\$237.00	\$104.69	\$135.02	\$84.59	\$455.78	\$195.78	\$415.02	\$176.95	\$390.64	\$155.53
202401	\$236.16	\$102.55	\$135.41	\$82.47	\$479.06	\$202.05	\$429.26	\$182.74	\$410.34	\$159.97
202402	\$237.36	\$103.67	\$137.72	\$85.01	\$486.85	\$200.60	\$436.76	\$182.15	\$419.52	\$161.88
202403	\$268.13	\$110.60	\$155.98	\$88.24	\$511.86	\$212.51	\$465.37	\$191.16	\$437.88	\$166.05
202404	\$257.67	\$104.07	\$150.46	\$83.79	\$498.57	\$189.88	\$449.33	\$170.78	\$432.11	\$153.98
202405	\$245.10	\$104.13	\$144.05	\$83.78	\$468.77	\$186.01	\$428.00	\$171.73	\$397.93	\$148.43
202406	\$243.57	\$106.58	\$144.60	\$86.59	\$462.86	\$187.53	\$426.18	\$175.12	\$389.37	\$144.62
202407	\$243.90	\$111.58	\$151.58	\$90.96	\$453.64	\$192.22	\$421.71	\$178.97	\$379.84	\$150.43
202408	\$244.36	\$111.61	\$149.91	\$89.94	\$450.05	\$196.62	\$418.98	\$183.51	\$384.60	\$155.02
202409	\$247.77	\$118.30	\$155.19	\$94.43	\$456.39	\$209.35	\$417.25	\$198.73	\$357.39	\$157.99
202410	\$221.61	\$110.11	\$150.48	\$93.91	\$417.20	\$189.99	\$393.40	\$177.02	\$336.04	\$148.07
202411	\$273.50	\$134.88	\$178.78	\$103.30	\$477.87	\$242.44	\$462.48	\$234.35	\$368.73	\$175.84
202412	\$274.97	\$130.44	\$176.34	\$102.12	\$491.50	\$246.52	\$479.28	\$238.70	\$371.18	\$174.04
202501	\$280.37	\$129.86	\$177.80	\$101.41	\$498.85	\$246.61	\$486.30	\$237.20	\$376.02	\$178.85
202502	\$307.85	\$129.70	\$207.80	\$103.27	\$519.47	\$236.62	\$477.84	\$232.19	\$344.06	\$166.78
202503	\$268.55	\$120.26	\$174.56	\$98.35	\$484.82	\$230.91	\$480.83	\$226.23	\$353.97	\$161.77
202504	\$271.78	\$116.59	\$179.82	\$95.65	\$472.36	\$209.37	\$476.19	\$208.86	\$344.79	\$147.53
202505	\$243.91	\$118.29	\$168.94	\$96.86	\$396.04	\$207.17	\$402.68	\$208.53	\$317.81	\$148.20
202506	\$255.52	\$123.47	\$175.78	\$99.59	\$431.83	\$211.12	\$437.12	\$211.74	\$316.55	\$149.79
202507	\$240.78	\$125.51	\$167.51	\$100.90	\$400.89	\$217.26	\$406.15	\$217.44	\$285.68	\$146.74
202508	\$237.51	\$129.12	\$169.92	\$103.77	\$382.95	\$213.05	\$387.83	\$212.55	\$272.34	\$148.46
202509	\$236.85	\$130.45	\$174.16	\$107.03	\$370.64	\$205.71	\$373.00	\$205.09	\$272.09	\$150.83
202510	\$232.35	\$127.46	\$173.85	\$105.68	\$360.28	\$199.49	\$363.63	\$199.51	\$257.02	\$147.02
202511	\$224.90	\$124.15	\$171.83	\$103.80	\$341.19	\$182.55	\$349.86	\$183.64	\$224.67	\$126.44

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-035

Responsible Witness: Matthew Prine, Vice President and Chief Customer Office

Question:

From January 2023 to present, please provide the total dollars of debt, disaggregated by month and year, as of the last day of the month/year, for each of the following groups:

- a. All residential customers;
- b. Residential customers, excluding confirmed low income customers;
- c. Confirmed low income customers;
- d. Confirmed low income customers, excluding H2O program participants; and
- e. H2O program participants.

If this data is unavailable as of the last day of the month/ year, please provide this data, disaggregated as requested, and specify at which point in the month/year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

Please refer to CAUSE-PA 01-035_Attachment for the total balances by month.

CAUSE-PA 01-035_Attachment

	A. All residential customers	B. Residential customers, excluding confirmed low income customers	C. Confirmed low income customers	D. Confirmed low income customers, excluding H2O program participants	E. H2O program participants
Month	Total Balances	Total Balances	Total Balances	Total Balances	Total Balances
202301	\$26,763,103	\$8,777,391	\$17,985,712	\$12,141,212	\$5,844,500
202302	\$28,520,493	\$8,111,135	\$20,409,358	\$14,430,959	\$5,978,399
202303	\$30,139,415	\$8,125,826	\$22,013,589	\$15,384,723	\$6,628,866
202304	\$30,024,913	\$10,705,468	\$19,319,444	\$13,636,295	\$5,683,149
202305	\$31,429,505	\$10,386,166	\$21,043,339	\$15,138,335	\$5,905,004
202306	\$30,216,024	\$10,067,601	\$20,148,423	\$14,289,891	\$5,858,532
202307	\$29,329,232	\$10,373,493	\$18,955,739	\$13,559,144	\$5,396,595
202308	\$30,948,395	\$9,670,728	\$21,277,667	\$15,059,647	\$6,218,021
202309	\$30,803,468	\$11,876,521	\$18,926,947	\$13,342,302	\$5,584,644
202310	\$31,183,194	\$9,388,813	\$21,794,381	\$15,664,826	\$6,129,555
202311	\$31,148,606	\$10,577,540	\$20,571,066	\$14,316,993	\$6,254,073
202312	\$31,656,693	\$11,445,315	\$20,211,378	\$14,161,479	\$6,049,899
202401	\$30,100,490	\$8,473,867	\$21,626,623	\$15,214,946	\$6,411,677
202402	\$31,529,801	\$7,950,455	\$23,579,346	\$16,904,218	\$6,675,128
202403	\$32,096,431	\$9,363,079	\$22,733,352	\$16,143,139	\$6,590,213
202404	\$30,248,613	\$9,153,896	\$21,094,717	\$14,938,795	\$6,155,922
202405	\$30,854,420	\$10,930,116	\$19,924,304	\$14,104,899	\$5,819,404
202406	\$31,187,478	\$11,610,854	\$19,576,623	\$13,942,685	\$5,633,938
202407	\$31,142,076	\$10,474,603	\$20,667,473	\$14,902,140	\$5,765,333
202408	\$32,345,646	\$12,816,678	\$19,528,969	\$13,962,133	\$5,566,835
202409	\$32,923,731	\$12,659,262	\$20,264,470	\$14,759,146	\$5,505,324
202410	\$37,521,521	\$15,111,309	\$22,410,212	\$16,774,112	\$5,636,101
202411	\$39,621,693	\$17,512,833	\$22,108,861	\$16,555,000	\$5,553,861
202412	\$39,102,433	\$14,748,024	\$24,354,409	\$18,420,281	\$5,934,128
202501	\$39,543,077	\$15,662,678	\$23,880,399	\$17,946,401	\$5,933,998
202502	\$39,237,764	\$15,057,064	\$24,180,700	\$18,910,320	\$5,270,380
202503	\$39,083,513	\$15,868,058	\$23,215,455	\$17,837,838	\$5,377,617
202504	\$38,318,593	\$16,995,751	\$21,322,842	\$16,489,186	\$4,833,656
202505	\$41,036,586	\$23,190,474	\$17,846,112	\$15,063,927	\$2,782,185
202506	\$39,834,474	\$19,614,160	\$20,220,314	\$17,539,083	\$2,681,231
202507	\$40,496,847	\$21,017,107	\$19,479,740	\$16,947,726	\$2,532,013
202508	\$41,380,669	\$23,584,378	\$17,796,291	\$15,413,856	\$2,382,435
202509	\$40,414,057	\$22,766,333	\$17,647,724	\$15,139,017	\$2,508,707
202510	\$42,253,508	\$24,974,430	\$17,279,078	\$14,948,409	\$2,330,669
202511	\$38,198,183	\$22,728,239	\$15,469,944	\$13,626,907	\$1,843,037

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-036

Responsible Witness: Max McClellan, Lead, Regulatory Analyst

Question:

From January 2023 to present, please provide the median and mean residential customer usage, disaggregated by service type (i.e. water only, wastewater only, combined), month, and year, as of the last day of the month/year, for each of the following groups:

- a. All residential customers;
- b. Residential customers, excluding confirmed low income customers;
- c. Confirmed low income customers;
- d. Confirmed low income customers, excluding H2O program participants; and
- e. H2O program participants.

If this data is unavailable as of the last day of the month/ year, please provide this data, disaggregated as requested, and specify at which point in the month/year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

Please see CAUSE-PA 01-036_Attachment for the requested information.

CAUSE-PA St. 1, Appendix B
Cited Discovery Responses

Pennsylvania American Water
R-2025-3057983 (Water)

CAUSE-PA 01-036 Attachment

Mean and Median Usage (in Gallons) of Residential Customers for Selected Segments

Customers receiving Water Service Only

Year-Month	A. All residential customers		B. Residential customers, excluding confirmed low income customers		C. Confirmed low income customers		D. Bill Discount Program participants, excluding H2O program participants		E. H2O program participants	
	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage
202301	3710	3100	3704	3100	3981	3200	3980	3200	4088	3600
202302	3182	2700	3175	2700	3484	2800	3182	2800	3701	3100
202303	2973	2500	2966	2500	3252	2600	2973	2600	3320	3050
202304	3467	3000	3460	3000	3805	3000	3467	3000	3999	3900
202305	3129	2600	3125	2600	3289	2700	3129	2700	3530	3150
202306	4007	3100	4007	3100	3982	3100	4007	3100	4384	3850
202307	3733	3000	3729	3000	3901	3100	3733	3100	4282	3600
202308	3341	2700	3333	2700	3682	2800	3341	2800	4243	3400
202309	3776	3100	3769	3100	4067	3200	3776	3200	4613	3800
202310	3173	2600	3165	2600	3510	2700	3173	2700	3816	3300
202311	3166	2700	3159	2700	3469	2800	3166	2800	3722	3200
202312	3269	2800	3259	2800	3692	2900	3269	2900	4154	3400
202401	3441	2900	3433	2900	3812	3000	3804	3000	4624	3500
202402	3250	2700	3239	2700	3717	3000	3250	3000	4136	3500
202403	3135	2600	3125	2600	3584	2900	3135	2900	3878	3400
202404	3085	2700	3075	2700	3530	2900	3085	2900	3936	3500
202405	3313	2800	3303	2800	3737	3000	3313	3000	4402	3500
202406	3819	3100	3808	3100	4295	3300	3819	3300	4693	3800
202407	3742	2900	3735	2900	4026	3100	3742	3100	4355	3500
202408	3666	2900	3658	2900	4017	3100	3666	3100	4785	3700
202409	3727	3000	3716	3000	4213	3300	3727	3200	4773	3900
202410	3252	2600	3242	2600	3708	2900	3252	2900	4297	3500
202411	3363	2800	3351	2800	3882	3100	3363	3100	5145	4000
202412	3204	2700	3192	2700	3722	3000	3204	2900	5447	3800
202501	3509	3000	3493	3000	4199	3300	4186	3300	5502	4050
202502	3384	2800	3366	2800	4182	3200	3384	3200	4927	4050
202503	3000	2500	2985	2500	3671	2900	3000	2800	3892	3700
202504	3050	2600	3035	2600	3684	2900	3050	2900	4824	3550
202505	3281	2800	3266	2800	3911	3100	3281	3100	4751	4000
202506	3461	2900	3446	2800	4105	3200	3461	3200	4763	3700
	101608.00		101319.00		114109.00				130982.00	

* Mean and median customer usages are based on premise-level data.

** Low-income customer usage is based on premises of customers that were low-income participants as of 6/30/25.

CAUSE-PA St. 1, Appendix B
Cited Discovery Responses

Pennsylvania American Water
R-2025-3057983 (Water)

CAUSE-PA 01-036 Attachment

Mean and Median Usage (in Gallons) of Residential Customers for Selected Segments

Customers receiving Wastewater Service Only

Year-Month	A. All residential customers		B. Residential customers, excluding confirmed low income customers		C. Confirmed low income customers		D. Bill Discount Program participants, excluding H2O program participants		E. H2O program participants	
	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage
202301	3250	2400	3240	2400	3629	3000	3631	3000	3375	3250
202302	3565	2400	3524	2400	5108	3000	3565	3000	4314	5000
202303	3361	2300	3336	2300	4304	3000	3361	3000	2843	2000
202304	2965	2000	2945	2000	3739	3000	2965	3000	2620	3000
202305	3226	2300	3203	2300	4071	3000	3226	3000	3771	5000
202306	3187	2300	3188	2300	3162	3000	3187	3000	3543	5000
202307	3401	2600	3389	2500	3869	3000	3401	3000	3060	3000
202308	3434	2300	3416	2300	4119	3000	3434	3000	3714	5000
202309	3381	2400	3364	2400	4064	3000	3381	3000	2750	3000
202310	3427	2400	3390	2400	4739	3000	3427	3000	3188	2950
202311	3331	2200	3312	2200	4079	3000	3331	3000	2700	2650
202312	3032	2100	3020	2100	3493	3000	3032	3000	2757	2900
202401	3360	2400	3336	2400	4245	3000	4246	3000	4143	5000
202402	3237	2200	3221	2200	3836	3000	3237	3000	3300	4000
202403	3007	2000	2992	2000	3552	3000	3007	3000	2871	3000
202404	2993	2100	2970	2100	3825	3000	2993	3000	2800	3000
202405	3135	2300	3116	2200	3866	3000	3135	3000	3120	3000
202406	3024	2100	2998	2100	3956	3000	3024	3000	4914	5000
202407	3346	2300	3325	2300	4115	3050	3346	3000	3929	4000
202408	3515	2500	3482	2400	4714	3150	3515	3100	3257	4000
202409	3273	2200	3252	2200	4037	3000	3273	3000	2950	3500
202410	3353	2400	3318	2300	4596	3450	3353	3500	2814	3000
202411	2940	2000	2913	2000	3960	3000	2940	3000	3057	3000
202412	3081	2100	3058	2100	4001	3000	3081	3000	3720	6000
202501	3466	2500	3420	2450	5154	3750	5155	3700	5129	5000
202502	3284	2300	3249	2300	4620	3000	3284	3000	3000	3000
202503	3109	2000	3077	2000	4265	3000	3109	3000	4029	4000
202504	3164	2100	3142	2100	4008	3000	3164	3000	2925	2650
202505	2905	2000	2886	2000	3581	3000	2905	3000	3414	4000
202506	3307	2300	3278	2200	4362	3000	3307	3000	5514	6000

* Mean and median customer usages are based on premise-level data.

** Low-income customer usage is based on premises of customers that were low-income participants as of 6/30/25.

Pennsylvania American Water
R-2025-3057983 (Water)

CAUSE-PA 01-036 Attachment

Mean and Median Usage (in Gallons) of Residential Customers for Selected Segments

Customers receiving Water & Wastewater Service

Year-Month	A. All residential customers		B. Residential customers, excluding confirmed low income customers		C. Confirmed low income customers		D. Bill Discount Program participants, excluding H2O program participants		E. H2O program participants	
	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage	mean residential customer usage	median residential customer usage
202301	3642	3000	3608	3000	4378	3500	4385	3500	4004	3250
202302	3234	2600	3200	2600	3975	3100	3954	3100	5082	3400
202303	2990	2500	2965	2500	3540	3000	3545	3000	3304	2800
202304	3402	2900	3369	2900	4120	3400	4120	3400	4122	3800
202305	2988	2500	2968	2500	3416	3000	3416	3000	3376	3000
202306	3440	2800	3412	2800	4048	3300	4049	3300	3990	3400
202307	3565	2900	3532	2900	4284	3500	4284	3500	4271	3700
202308	3185	2600	3132	2600	4331	3100	4345	3100	3622	3000
202309	3597	3000	3553	2900	4568	3600	4567	3600	4668	3900
202310	3002	2500	2970	2400	3715	3000	3718	3000	3570	3200
202311	3046	2600	3011	2500	3808	3100	3808	3100	3800	3500
202312	3052	2600	3031	2600	3502	3000	3490	3000	4122	3300
202401	3267	2800	3226	2700	4180	3400	4168	3400	4788	3700
202402	3099	2600	3054	2600	4067	3200	4034	3200	5859	3300
202403	2963	2500	2929	2400	3696	3100	3676	3100	4757	3100
202404	2988	2500	2947	2500	3866	3100	3869	3100	3708	3200
202405	3144	2600	3103	2600	4032	3300	4032	3300	4004	3500
202406	3451	2900	3409	2800	4354	3400	4350	3400	4567	3700
202407	3364	2700	3322	2700	4261	3400	4255	3400	4578	3700
202408	3272	2700	3230	2600	4170	3400	4160	3400	4697	3500
202409	3422	2800	3375	2800	4444	3600	4436	3600	4886	3850
202410	2901	2400	2866	2400	3660	3000	3657	3000	3833	3500
202411	3125	2600	3092	2600	3842	3200	3836	3200	4182	3200
202412	2950	2500	2910	2400	3843	3000	3844	3000	3768	3600
202501	3350	2800	3305	2700	4320	3400	4328	3400	3882	3700
202502	3100	2500	3059	2500	3992	3200	4000	3200	3534	3300
202503	2837	2300	2799	2300	3667	3000	3668	3000	3627	3500
202504	2858	2400	2807	2400	3947	3000	3951	3000	3719	3600
202505	3059	2600	3016	2500	3996	3300	3997	3300	3948	3950
202506	3204	2600	3158	2600	4224	3300	4228	3300	4000	3900

* Mean and median customer usages are based on premise-level data.

** Low-income customer usage is based on premises of customers that were low-income participants as of 6/30/25.

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-041

Responsible Witness: Matthew Prine, Vice President and Chief Customer Office

Question:

From January 2023 to present, please provide the number of PAWC customers who received a payment arrangement, disaggregated by month and year, as of the last day of the month, for each of the following groups:

- a. All residential customers;
- b. Residential customers, excluding confirmed low income customers;
- c. Confirmed low income customers;
- d. Confirmed low income customers, excluding H2O program participants; and
- e. H2O program participants.

If this data is unavailable as of the last day of the month/year, please provide this data, disaggregated as requested, and specify at which point in the month/year these customer counts were calculated. Please provide this data in a live Excel spreadsheet.

Response:

a-e. Please refer to CAUSE-PA 01-041_Attachment, which reflects new installment plans negotiated in each respective month.

CAUSE-PA 01-041_Attachment

Year and Month	A. All residential customers;	Year and Month	B. Residential customers, excluding confirmed low income customers;	Year and Month	C. Confirmed low income customers;	Year and Month	D. Confirmed low income customers, excluding H2O program participants;	Year and Month	E. H2O program participants.
202301	3,478	202301	449	202301	3,029	202301	1,658	202301	1,023
202302	4,029	202302	433	202302	3,596	202302	2,021	202302	1,084
202303	4,321	202303	508	202303	3,813	202303	2,053	202303	1,200
202304	4,184	202304	506	202304	3,678	202304	2,074	202304	1,079
202305	5,959	202305	651	202305	5,308	202305	3,041	202305	1,410
202306	5,993	202306	665	202306	5,328	202306	3,086	202306	1,346
202307	5,728	202307	618	202307	5,110	202307	2,998	202307	1,251
202308	6,407	202308	637	202308	5,770	202308	3,439	202308	1,432
202309	5,147	202309	530	202309	4,617	202309	2,675	202309	1,302
202310	5,708	202310	604	202310	5,104	202310	3,052	202310	1,355
202311	4,925	202311	605	202311	4,320	202311	2,614	202311	1,192
202312	4,806	202312	484	202312	4,322	202312	2,652	202312	1,190
202401	4,675	202401	475	202401	4,200	202401	2,566	202401	1,183
202402	4,163	202402	472	202402	3,691	202402	2,286	202402	1,008
202403	4,465	202403	495	202403	3,970	202403	2,471	202403	1,029
202404	4,928	202404	562	202404	4,366	202404	2,754	202404	1,107
202405	5,507	202405	511	202405	4,996	202405	3,059	202405	1,349
202406	4,475	202406	458	202406	4,017	202406	2,504	202406	1,003
202407	4,936	202407	524	202407	4,412	202407	2,780	202407	1,058
202408	4,973	202408	575	202408	4,398	202408	2,850	202408	1,037
202409	4,646	202409	513	202409	4,133	202409	2,620	202409	966
202410	4,280	202410	518	202410	3,762	202410	2,401	202410	920
202411	3,309	202411	378	202411	2,931	202411	1,752	202411	859
202412	4,280	202412	568	202412	3,712	202412	2,299	202412	1,109
202501	5,673	202501	754	202501	4,919	202501	3,116	202501	1,436
202502	5,950	202502	772	202502	5,178	202502	3,094	202502	1,718
202503	6,239	202503	754	202503	5,485	202503	3,347	202503	1,745
202504	6,619	202504	829	202504	5,790	202504	3,524	202504	1,799
202505	6,549	202505	767	202505	5,782	202505	3,394	202505	1,681
202506	6,097	202506	705	202506	5,392	202506	3,085	202506	1,558
202507	6,755	202507	754	202507	6,001	202507	3,398	202507	1,666
202508	6,152	202508	699	202508	5,453	202508	3,143	202508	1,468
202509	6,849	202509	825	202509	6,024	202509	3,467	202509	1,709
202510	7,076	202510	878	202510	6,198	202510	3,504	202510	1,952
202511	6,020	202511	750	202511	5,270	202511	2,981	202511	1,475

68,135

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-042

Responsible Witness: Matthew Prine, Vice President and Chief Customer Office

Question:

For the customers listed in response to CAUSE-PA I-41, and for the customer segments identified in that question, please identify the number of customers who:

- a. Failed to make the initial payment agreed to under the payment arrangement;
- b. Made fewer than 3 payments under the payment arrangement;
- c. Made fewer than 6 payments under the payment arrangement;
- d. Made fewer than 12 payments under the payment arrangement.

- e. Made more than 12 payments under the payment.
- f. Completed the payment arrangement.

Response:

Please refer to CAUSE-PA 01-042_Attachment. The Company's SAP system only tracks the number of payments a customer makes on a payment arrangement while the arrangement is still active. Once the payment arrangement is deactivated, SAP no longer maintains this information. For parts b – f, the count of customers is provided for customers with an active payment arrangement as of December 2025.

CAUSE-PA 01-042_Attachment

a. Failed to make the initial payment agreed to under the payment arrangement;

Year and Month	A. All residential customers;	Year and Month	B. Residential customers, excluding confirmed low income customers;	Year and Month	C. Confirmed low income customers;	Year and Month	D. Confirmed low income customers, excluding H2O program participants;	Year and Month	E. H2O program participants.
202301	1,624	202301	1,363	202301	261	202301	141	202301	91
202302	1,936	202302	1,443	202302	493	202302	316	202302	118
202303	1,988	202303	1,456	202303	532	202303	279	202303	191
202304	1,499	202304	1,213	202304	286	202304	158	202304	81
202305	2,360	202305	1,580	202305	780	202305	495	202305	171
202306	2,391	202306	1,659	202306	732	202306	458	202306	178
202307	2,618	202307	2,063	202307	555	202307	348	202307	116
202308	2,880	202308	2,057	202308	823	202308	530	202308	172
202309	2,493	202309	1,939	202309	554	202309	362	202309	118
202310	2,492	202310	1,767	202310	725	202310	458	202310	177
202311	1,949	202311	1,520	202311	429	202311	275	202311	98
202312	2,130	202312	1,579	202312	551	202312	344	202312	130
202401	2,231	202401	1,687	202401	544	202401	338	202401	159
202402	1,982	202402	1,511	202402	471	202402	309	202402	107
202403	2,000	202403	1,530	202403	470	202403	295	202403	114
202404	2,168	202404	1,648	202404	520	202404	342	202404	117
202405	2,565	202405	1,759	202405	806	202405	552	202405	151
202406	2,037	202406	1,490	202406	547	202406	395	202406	91
202407	2,374	202407	1,815	202407	559	202407	416	202407	81
202408	2,206	202408	1,736	202408	470	202408	359	202408	72
202409	2,338	202409	1,868	202409	470	202409	349	202409	85
202410	1,678	202410	1,192	202410	486	202410	353	202410	102
202411	1,348	202411	1,000	202411	348	202411	257	202411	63
202412	2,795	202412	2,609	202412	186	202412	126	202412	42
202501	3,090	202501	2,690	202501	400	202501	314	202501	64
202502	2,927	202502	2,298	202502	629	202502	456	202502	114
202503	3,041	202503	2,419	202503	622	202503	475	202503	107
202504	2,842	202504	2,257	202504	585	202504	450	202504	70
202505	2,906	202505	2,066	202505	840	202505	651	202505	74
202506	2,487	202506	1,834	202506	653	202506	478	202506	68
202507	2,296	202507	1,642	202507	654	202507	476	202507	45
202508	1,656	202508	1,211	202508	445	202508	341	202508	20
202509	1,372	202509	947	202509	425	202509	312	202509	39
202510	501	202510	343	202510	158	202510	118	202510	8
202511	141	202511	93	202511	48	202511	35	202511	2

CAUSE-PA 01-042_Attachment

Note: Below data is as of Dec 2025

	b. Made fewer than 3 payments under the payment arrangement;	c. Made fewer than 6 payments under the payment arrangement;	d. Made fewer than 12 payments under the payment arrangement.	e. Made more than 12 payments under the payment.	f. Completed the payment arrangement.
Residential Customers	11974	25456	35879	3320	25664
Residential customers, excluding confirmed low income customers;	2136	4975	6162	348	5073
Confirmed low income customers	9838	20481	29717	2972	20591
Confirmed low income customers, excluding H2O program participants	5156	11833	18176	2026	13462
H2O program participants	4938	9097	12061	969	7377

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 2**

CAUSE-PA 02-001

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question: If a customer enrolls in PAWC's bill discount program (BDP) and has arrears, are they automatically enrolled in PAWC's arrearage forgiveness program (AFP)? If the answer to this question is no, please explain why PAWC operates these programs separately and what process a customer who enrolls in BDP must go through to enroll in AFP.

Response:

Yes, if the arrears balance is at least \$150 and 60 or more days old, the customer is automatically enrolled in the Company's Arrearage Management Program (AMP).

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 2**

CAUSE-PA 02-040

Responsible Witness: Christina Chard, Senior Director of Rates and Regulatory for AWWSC

Question: Has PAWC evaluated the feasibility of other methods of providing assistance to non-ratepayer tenants of PAWC, such as eligibility in any of PAWC's existing assistance programs? Please provide any reports or written analysis related to such an evaluation.

Response:

No, PAWC is proposing this pilot program to evaluate if a program similar to the one offered by its California affiliate would be successful in Pennsylvania. As a result, PAWC did not consider alternative programs.

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 3**

CAUSE-PA 03-001

Responsible Witness: Jim Runzer, Vice President of Operations for PAWC

Question: Does PAWC have a process or procedure for identifying customer-side leaks and communicating repair obligations to customers? If so, please describe this process. If not, please state why PAWC does not have such a process.

Response:

Yes. PAWC has a process for identifying customer side service line leaks and for informing customers of their repair responsibilities. This process is described in PAWC's statewide Leak on Owner's Side (LOOS) procedures.

When a potential customer side leak is identified, PAWC first confirms whether a leak exists and whether the leak is located on the portion of the service line owned by the customer. A leak may be identified through a field service visit, a review of work orders, information provided by the customer, or observations made during other operational activities.

Once the leak is confirmed and determined to be on the customer-owned portion of the service line. PAWC issues written notice (door tags) to the customer explaining that a leak has been confirmed that the customer is responsible for completing repairs, and what timelines apply. The specific notice varies depending on whether the customer has Water Line Protection coverage. The first letter requests the customer to have repairs made within a 10-day timeframe. The notice also includes a QR code for customers to identify their service line material. If it is confirmed galvanized or lead, PAWC will work with the customer to arrange a replacement at no charge to the customer. Leaks without Water Line Protection, get checked after 10 days. If repairs have not been made at that time, a 10-day water termination notice is issued and 3-day notice is scheduled. If the customer has Water Line Protection, we will wait until an open claims list from the provider is sent with updates.

PAWC creates and tracks a service order to monitor the status of the required repair. If the customer does not complete the repair within the established timeframe, PAWC follows the standard escalation procedure. This may include sending additional notices and, when permitted under applicable Pennsylvania Public Utility Commission rules, initiating service termination to prevent waste and protect system integrity. During winter months and in situations where a customer uses hot water heat, additional considerations apply to ensure compliance with service termination requirements.

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 3**

CAUSE-PA 03-003

Responsible Witness: Matthew Prine, VP and Chief Customer Officer

Question: From January 2023 to present, disaggregated by month and year, please provide:

- a. The number of conservation kits distributed to residential customers,
- b. The number of kits confirmed as installed,
- c. The average cost per kit,
- d. Any data PAWC has collected regarding water usage before and after installation.

If any of the above data is not available, please explain why.

Response:

- a. Please see CAUSE 03-003_Attachment.
- b. PAWC does not collect this information because the customer is responsible for installing the items received from the conservation kit.
- c. The stationary kits cost \$11.80 each, and the handheld kits cost \$16.75 each.
- d. PAWC does not collect this information because the customer does not notify the Company if or when they install the items received from the conservation kit.

CAUSE-PA 03-003_Attachment

Month	Conservation Kits Sent to Customers
Jan-23	47
Feb-23	59
Mar-23	97
Apr-23	47
May-23	51
Jun-23	93
Jul-23	46
Aug-23	69
Sep-23	124
Oct-23	336
Nov-23	127
Dec-23	99
Jan-24	319
Feb-24	276
Mar-24	346
Apr-24	319
May-24	244
Jun-24	258
Jul-24	218
Aug-24	474
Sep-24	283
Oct-24	0
Nov-24	32
Dec-24	112
Jan-25	23
Feb-25	26
Mar-25	141
Apr-25	127
May-25	52
Jun-25	65
Jul-25	60
Aug-25	103
Sep-25	81
Oct-25	123
Nov-25	81
Dec-25	89

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 3**

CAUSE-PA 03-004

Responsible Witness: Jim Runzer , Vice President of Operations for PAWC

Question: Does PAWC track unresolved customer-side service leaks? If yes, please provide:

- a. The number of unresolved leak cases among confirmed low income or BDP customers; and
- b. The average length of time such leaks remain unresolved; and

Response:

PAWC tracks customer side service leaks through its Leak on Owner's Side (LOOS) process. When a customer side leak is confirmed, PAWC creates a service order to monitor the required repair and documents follow up actions until the issue is resolved or escalated. This tracking includes the date the leak was identified, customer notifications, progress updates, and final repair confirmation.

a - b. PAWC does not maintain a separate reporting category that identifies unresolved LOOS cases specifically for confirmed low-income customers or customers enrolled in the Bill Discount Program (BDP). PAWC does not maintain aggregated counts of unresolved customer side leaks limited to these customer groups, nor does it maintain calculated averages for the duration.

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
Office of Consumer Advocate Set 4**

OCA 04-021

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question: In Excel format, please provide by month for January 2021 to present:

- a. The average arrears of identified low-income residential accounts (excluding Bill Discount Program participants) in arrears;
- b. The average bill for current service of identified low-income residential accounts in arrears;
- c. The total dollars of identified low-income residential arrears;
- d. The percentage of total identified low-income residential billed dollars constituting arrears;
- e. The percentage of billed identified low-income residential accounts having arrears; and
- f. The average arrears of all identified low-income residential accounts disconnected for nonpayment in that month.

Response:

Please refer to the OCA 04-021_Attachment. Consistent with the Company's data retention policy, the Company does not have the requested data prior to January 1, 2023 stored in its information technology systems.

OCA 04-021_Attachment

Year_Month	a. The average arrears of identified low-income residential accounts (excluding Bill Discount Program participants) in arrears	b. The average bill for current service of BDP participants in arrears;	c. The total dollars of identified low-income residential arrears	d. The percentage of total identified low-income residential billed dollars constituting arrears	e. The percentage of billed identified low-income residential accounts having arrears and	f. The average arrears of all identified low-income residential accounts disconnected for nonpayment in that month.
202301	\$ 371.70	\$ 88.53	\$ 19,867,222.08	16.46%	58.01%	\$ 498.24
202302	\$ 380.79	\$ 86.83	\$ 20,385,853.07	16.07%	61.69%	\$ 856.74
202303	\$ 403.08	\$ 88.13	\$ 20,225,732.14	18.08%	66.02%	\$ 813.89
202304	\$ 375.00	\$ 96.58	\$ 21,323,921.49	14.90%	63.06%	\$ 432.80
202305	\$ 380.55	\$ 89.23	\$ 20,914,088.65	16.46%	66.89%	\$ 478.23
202306	\$ 369.87	\$ 100.14	\$ 21,504,427.99	14.81%	65.46%	\$ 558.14
202307	\$ 377.36	\$ 100.17	\$ 22,029,584.35	14.28%	61.83%	\$ 623.31
202308	\$ 387.26	\$ 94.11	\$ 21,315,970.40	15.21%	67.80%	\$ 508.14
202309	\$ 378.76	\$ 102.29	\$ 22,271,840.67	12.98%	63.86%	\$ 490.58
202310	\$ 400.40	\$ 91.04	\$ 21,299,986.09	14.71%	65.89%	\$ 632.56
202311	\$ 391.70	\$ 89.10	\$ 21,064,629.72	14.86%	66.45%	\$ 431.08
202312	\$ 376.46	\$ 89.85	\$ 21,496,779.78	14.01%	64.99%	\$ 628.06
202401	\$ 406.08	\$ 94.81	\$ 21,530,924.29	14.11%	65.01%	\$ 348.89
202402	\$ 416.77	\$ 94.07	\$ 21,420,629.59	14.21%	65.15%	\$ 1,440.82
202403	\$ 430.69	\$ 88.59	\$ 21,474,411.04	14.89%	65.73%	\$ 514.64
202404	\$ 407.27	\$ 89.03	\$ 20,725,520.94	16.01%	64.94%	\$ 568.60
202405	\$ 386.89	\$ 90.81	\$ 19,789,491.08	15.91%	67.13%	\$ 454.69
202406	\$ 377.30	\$ 100.25	\$ 21,065,964.94	13.25%	64.07%	\$ 701.54
202407	\$ 381.98	\$ 98.86	\$ 22,137,139.16	14.36%	65.42%	\$ 625.19
202408	\$ 377.65	\$ 98.11	\$ 22,916,230.67	13.66%	66.73%	\$ 276.79
202409	\$ 380.65	\$ 105.46	\$ 24,219,885.90	12.08%	64.58%	\$ 989.87
202410	\$ 397.01	\$ 95.20	\$ 25,532,809.88	13.52%	69.68%	\$ (30.00)
202411	\$ 433.70	\$ 100.75	\$ 28,051,290.13	12.70%	69.18%	-
202412	\$ 459.15	\$ 98.21	\$ 24,468,561.86	12.84%	71.82%	-
202501	\$ 466.38	\$ 106.44	\$ 25,422,876.39	12.77%	72.21%	\$ 755.41
202502	\$ 467.14	\$ 106.64	\$ 26,483,229.12	12.07%	69.00%	\$ 962.61
202503	\$ 484.85	\$ 96.36	\$ 25,770,220.32	14.51%	69.23%	\$ 1,537.82
202504	\$ 451.98	\$ 95.96	\$ 26,036,005.31	15.71%	67.92%	\$ 936.97
202505	\$ 392.01	\$ 107.33	\$ 26,634,211.68	14.66%	71.23%	\$ 578.82
202506	\$ 408.68	\$ 114.76	\$ 27,607,474.33	14.52%	68.08%	\$ 959.86
202507	\$ 385.49	\$ 116.44	\$ 27,730,487.51	15.44%	69.64%	\$ 946.73
202508	\$ 363.57	\$ 117.53	\$ 28,105,854.63	14.76%	69.57%	\$ 704.65
202509	\$ 359.20	\$ 115.93	\$ 28,174,263.83	15.77%	68.01%	\$ 648.62
202510	\$ 353.52	\$ 107.02	\$ 27,837,704.92	17.42%	72.31%	\$ 762.96
202511	\$ 336.64	\$ 111.42	\$ 27,536,028.53	17.76%	61.44%	\$ 3,332.15

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
Office of Consumer Advocate Set 4**

OCA 04-022

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question: Where applicable, in Excel format, please provide by month for January 2021 to present:

- a. The average arrears of Bill Discount Program (BDP) participants in arrears;
- b. The average bill for current service of BDP participants in arrears;
- c. The total dollars of BDP participant arrears;
- d. The percentage of total BDP participant billed dollars constituting arrears;
- e. The percentage of billed BDP participants having arrears; and
- f. The average arrears of all BDP participants disconnected for nonpayment in that month.

Response:

Please refer to the OCA 04-022_Attachment. Consistent with the Company's data retention policy, the Company does not have the requested data prior to January 1, 2023 stored in its information technology systems.

OCA 04-022_Attachment

Year_Month	a. The average arrears of Bill Discount Program (BDP) participants in arrears	b. The average bill for current service of BDP participants in arrears;	c. The total dollars of BDP participant arrears	d. The percentage of total BDP participant billed dollars constituting arrears.	e. The percentage of billed BDP participants having arrears	f. The average arrears of all BDP participants disconnected for nonpayment in that month
202301	\$ 147.07	\$ 71.06	\$ 7,426,593.60	9.44%	55.89%	\$ 937.67
202302	\$ 137.83	\$ 62.67	\$ 6,918,980.63	8.81%	52.59%	\$ 929.83
202303	\$ 160.52	\$ 53.97	\$ 7,010,887.36	10.17%	62.01%	\$ 1,524.40
202304	\$ 155.78	\$ 60.61	\$ 6,957,968.68	8.30%	58.16%	\$ 1,076.69
202305	\$ 154.81	\$ 54.93	\$ 6,829,984.18	9.10%	61.55%	\$ 1,146.13
202306	\$ 158.85	\$ 63.46	\$ 6,929,842.79	8.55%	60.19%	\$ 1,160.10
202307	\$ 158.24	\$ 63.99	\$ 6,915,819.35	8.16%	55.52%	\$ 972.57
202308	\$ 159.19	\$ 58.51	\$ 6,819,389.83	8.75%	62.12%	\$ 1,236.05
202309	\$ 155.72	\$ 65.83	\$ 7,077,020.30	7.83%	56.95%	\$ 1,188.47
202310	\$ 152.15	\$ 58.06	\$ 7,136,103.22	8.88%	60.09%	\$ 1,139.52
202311	\$ 154.27	\$ 56.51	\$ 7,221,603.83	9.20%	60.71%	\$ 1,046.08
202312	\$ 156.60	\$ 57.26	\$ 7,893,906.92	9.29%	58.59%	\$ 1,304.91
202401	\$ 158.63	\$ 59.37	\$ 7,791,616.79	9.17%	52.76%	\$ 1,573.22
202402	\$ 167.96	\$ 60.20	\$ 7,826,402.73	9.31%	57.00%	\$ 1,330.21
202403	\$ 162.48	\$ 54.91	\$ 7,854,244.28	9.40%	57.89%	\$ 1,115.94
202404	\$ 163.33	\$ 55.95	\$ 7,527,359.42	9.73%	57.83%	\$ 1,134.32
202405	\$ 167.10	\$ 57.45	\$ 7,546,501.07	10.11%	60.27%	\$ 1,094.62
202406	\$ 164.72	\$ 61.73	\$ 7,715,258.12	8.51%	55.86%	\$ 1,310.69
202407	\$ 167.24	\$ 60.67	\$ 7,622,119.95	8.77%	57.58%	\$ 1,215.31
202408	\$ 160.50	\$ 57.24	\$ 7,549,732.20	8.17%	57.22%	\$ 1,106.34
202409	\$ 160.04	\$ 53.05	\$ 7,670,408.92	7.24%	54.51%	\$ 1,643.54
202410	\$ 159.97	\$ 45.34	\$ 7,754,185.89	7.90%	59.23%	\$ 698.40
202411	\$ 158.14	\$ 48.39	\$ 8,241,360.34	7.44%	57.37%	\$ -
202412	\$ 161.77	\$ 46.38	\$ 8,347,906.25	8.48%	61.22%	\$ 2,349.34
202501	\$ 167.24	\$ 50.89	\$ 8,622,329.63	8.64%	61.79%	\$ 1,439.39
202502	\$ 166.74	\$ 50.21	\$ 8,740,038.37	7.92%	57.51%	\$ 1,237.66
202503	\$ 170.07	\$ 45.87	\$ 8,851,865.66	9.12%	58.21%	\$ 1,231.29
202504	\$ 176.90	\$ 46.26	\$ 9,147,281.74	9.79%	57.56%	\$ 1,778.33
202505	\$ 204.32	\$ 60.56	\$ 6,823,217.45	6.85%	62.65%	\$ 1,286.51
202506	\$ 218.29	\$ 68.66	\$ 6,072,110.24	5.86%	58.04%	\$ 1,010.79
202507	\$ 228.31	\$ 65.55	\$ 6,414,270.02	6.31%	59.73%	\$ 1,635.36
202508	\$ 231.15	\$ 63.75	\$ 6,828,378.49	6.10%	59.72%	\$ 1,484.36
202509	\$ 232.33	\$ 60.81	\$ 7,596,549.55	7.02%	59.22%	\$ 1,026.72
202510	\$ 242.93	\$ 53.79	\$ 8,072,969.22	8.14%	64.81%	\$ 1,156.93
202511	\$ 211.86	\$ 51.86	\$ 8,065,184.01	8.16%	51.30%	\$ 1,552.24

1 rates¹ and children may experience school absenteeism and increased interpersonal
2 conflict.² High water bills can also increase the likelihood that these households may resort to
3 expensive payday loans to pay for basic living expenses.³

4 Even at PAWC’s current rates, many families already must make difficult choices between
5 paying for utility services and other basic necessities – raising rates for such consumers will make
6 their ability to afford and/or obtain and retain such necessities more difficult.

7 **Q: Are low income customers enrolled in PAWC’s Bill Discount Program (BDP)**
8 **protected from the financial impact of the proposed rate increase?**

9 A: No. PAWC’s BDP will reduce but not eliminate the financial impact of PAWC’s proposed
10 rate increases for BDP participants. Unlike a Percentage of Income Program, which ties rates
11 directly to each participant’s household income, PAWC’s BDP is designed as a tiered rate discount
12 program which provides an aggregated group of participants a percentage discount on rates. When
13 rates increase, without a corresponding increase in the BDP discount, the resulting BDP charges
14 necessarily increase. In this case, PAWC has proposed to ~~reduce~~ adjust its current discount levels,
15 which would have a marginal effect on bills for BDP enrollees at current rates, but would
16 not sufficiently compensate for the requested increase in rates. ~~increase rates for customers~~
17 participating in PAWC’s BDP.⁴ The effectiveness of PAWC’s BDP and both current and proposed
18 rates is dependent on approval of robust enhancements to the structure and discounts provided
19 under the BDP, and the ability of customers to enroll.

¹ Id.

² Low Income Household Water Assistance Program – Implementation and Impact Final Report. U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services (Internal Citations omitted)., <https://acf.gov/sites/default/files/documents/ocs/LIHWAP-Final-Impact-and-Implementation-Report.pdf> (Issued January 2025).

³ Income Volatility in the Service Sector at p. 9 (almost a quarter of consumers reporting week-to-week volatility report using payday lenders).

⁴ PAWC Statement No. 2 at 14: 20; CAUSE-PA Exhibit 1-c.

- 20 As it stands, PAWC's BDP enrollment remains very low – reaching just 13% of PAWC's
- 21 estimated low income customers and 30% of PAWC's confirmed low income customers (those

1 As illustrated in CAUSE-PA Exhibit 1, the existing BDP discount rates do not produce
 2 consistent levels of affordability – especially for BDP participants with the lowest income with
 3 higher usages. For example, a household of four at 150% FPL using 6,000 gallons per month is
 4 currently charged a monthly bill of approximately \$163.73, or 3.97% of gross household income
 5 – just barely what is considered affordable by that particular metric.¹

6 As currently structured, PAWC’s BDP is not providing affordable bills or precise levels of
 7 affordability for its participants – especially for higher usage customers. This is problematic, as,
 8 in addition to the likelihood of low income households living in homes with leaks and
 9 inefficiencies, these high bills disproportionately impact larger and/or multi-generational
 10 households. Unlike typical electric and gas usage, water usage varies significantly by the size of
 11 the household, making it even more critical to ensure that rate assistance is individualized to the
 12 household based on their ability to pay.²

13 **Q: Is PAWC proposing any changes to its BDP?**

14 A: Yes. The Company is proposing to adjust its discount levels for both water and wastewater
 15 as shown in the Table below.

16 **Table 12: Proposed BDP Discounts³**

FPL	Proposed Water (Fixed and Volumetric)	Proposed Wastewater (Fixed and Volumetric)
0-50%	82%	8582%
51-100%	67%	7367%
101-150%	44%	5544%
151-200%	22%	3722%

17

¹ CAUSE-PA Exhibit 1-c.

² Water/Color Report at 28.

³ PAWC Statement No. 2 at 14: 20.

1 **Q: Do you support PAWC’s proposed BDP changes?**

2 A: No. As shown in CAUSE-PA Exhibit 1-c, the proposed changes to PAWC’s BDP discount
 3 levels will result in higher bills for some BDP participants even at ~~both current and proposed~~
 4 ~~rates, and do not provide consistent affordability at proposed rates.~~ ~~That is, all other things being~~
 5 ~~equal, the changes proposed by PAWC would be worse for existing BDP customers at existing~~
 6 ~~rates. For example, a household of four at 50% FPL using 6,000 gallons per month who is enrolled~~
 7 ~~in the BDP currently has a burden of 3.87%, brushing up against the 4% standard of affordability.~~
 8 ~~With the proposed changes in the BDP discount level, that same household will have a burden of~~
 9 ~~4.24%.[†] Once any rate increase is factored in, the proposed discounts will have even less of a~~
 10 ~~mitigating effect on these unaffordable bills.~~

11 Analysis provided by PAWC similarly shows that average bills for BDP customers will
 12 continue to be high. For example, PAWC reports the following BDP bill amounts at proposed rates
 13 and proposed discount levels:

14 **Table 13: Proposed BDP Bills, 5,000 gal./month²**

	Proposed BDP Bill – Water	Proposed BDP Bill – Wastewater	Proposed BDP Bill - Combined
Tier 1 (0-50% FPL)	\$24.36	26.58	\$50.94
Tier 2 (51-100% FPL)	\$44.66	47.85	\$92.51
Tier 3 (101-150% FPL)	\$75.79	\$79.75	\$155.54
Tier 4 (151-200% FPL)	\$105.57	\$111.65	\$217.22

15 For example, a household of three using 5,000 gallons per month, squarely in the middle of Tier
 16 3 with monthly gross income of \$2,846 would have a water/wastewater burden of 5.5% at

[†] CAUSE PA Exhibit 1 c.

² PAWC Response to CAUSE-PA 01-026, Attachment, and 01-027, Attachment, attached hereto at Appendix B.

17 proposed rates, which is not considered affordable according to the Company's own metrics. As
18 discussed

1 upgrades, it should be required to ensure the upgrades will support implementation of a
 2 PIP structure in the future.

3 In the interim, I recommend the following BDP structure and discount levels to better
 4 ensure the program produces affordable water/wastewater burdens and participants stay connected
 5 to services:

6 **Table 14: Recommended BDP Discounts**

	Water		Wastewater	
	Fixed Charge	Volumetric Charge	Fixed Charge	Volumetric Charge
Tier 1 (0-50% FPL)	100%	85%	100%	85%
Tier 2 (51-100% FPL)	100%	75%	100%	75%
Tier 3 (101-150% FPL)	100%	50%	100%	50%
Tier 4 (151-200% FPL)	100%	25%	100%	25%

7 Pursuant to this proposal, customers with income between 0%-200% FPL would see
 8 marked improvements to affordability and reductions in water/wastewater burdens. Under the
 9 Company’s BDP proposal, a family of four at 150% FPL using 50 gallons per person/day, or
 10 approximately 6,000 gallons/month, will be burdened with combined water/wastewater burdens
 11 of 4.4298%,¹ This exceeds the 4% affordability burden standard discussed above. By comparison,
 12 under my proposed modifications shown in Table 12, the same BDP participant at proposed rates—
 13 with the same household size, usage, and FPL – will have a 3.97% combined water/wastewater
 14 burden. CAUSE-PA Exhibit 1 provides additional information related to the resulting burdens
 15 under the proposed BDP structure I have recommended above.

16 At the proposed discount levels I have outlined above, BDP participants will be charged
 17 rates that are more consistently affordable, regardless of relative income level, household size,

¹ CAUSE-PA Exhibit 1-b, 1-c.

18 and usage levels, I note that my recommendations within the context of this proceeding should
19 not be

Note: Due to limitations in Excel, it was not possible to strike-out errors, as such, errors are noted in red on these pages.

CAUSE-PA Exhibit 1-b Water/Wastewater Burden Tables
Proposed Full Tariff vs. PAWC Proposed BDP

2 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) 2026	PAWC Annual Proposed (\$) 2026	Burden (%) PAWC 2026	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026
1000 Gal.							
50% FPL	\$ 10,820	\$ 94.52	\$ 1,134.24	10.48%	\$ 17.00	\$ 204.00	1.89%
100% FPL	\$ 21,640	\$ 94.52	\$ 1,134.24	5.24%	\$ 31.17	\$ 374.04	1.73%
150% FPL	\$ 32,460	\$ 94.52	\$ 1,134.24	3.49%	\$ 52.90	\$ 634.80	1.96%
200% FPL	\$ 43,280	\$ 94.52	\$ 1,134.24	2.62%	\$ 73.67	\$ 884.04	2.04%
3000 Gal							
50% FPL	\$ 10,820	\$ 203.56	\$ 2,442.72	22.58%	\$ 36.60	\$ 439.20	4.06%
100% FPL	\$ 21,640	\$ 203.56	\$ 2,442.72	11.29%	\$ 67.11	\$ 805.32	3.72%
150% FPL	\$ 32,460	\$ 203.56	\$ 2,442.72	7.53%	\$ 113.90	\$ 1,366.80	4.21%
200% FPL	\$ 43,280	\$ 203.56	\$ 2,442.72	5.64%	\$ 158.61	\$ 1,903.32	4.40%
6000 Gal							
50% FPL	\$ 10,820	\$ 367.12	\$ 4,405.44	40.72%	\$ 66.00	\$ 792.00	7.32%
100% FPL	\$ 21,640	\$ 367.12	\$ 4,405.44	20.36%	\$ 121.02	\$ 1,452.24	6.71%
150% FPL	\$ 32,460	\$ 367.12	\$ 4,405.44	13.57%	\$ 205.40	\$ 2,464.80	7.59%
200% FPL	\$ 43,280	\$ 367.12	\$ 4,405.44	10.18%	\$ 286.02	\$ 3,432.24	7.93%
8000 Gal							
50% FPL	\$ 10,820	\$ 476.16	\$ 5,713.92	52.81%	\$ 85.60	\$ 1,027.20	9.49%
100% FPL	\$ 21,640	\$ 476.16	\$ 5,713.92	26.40%	\$ 156.96	\$ 1,883.52	8.70%
150% FPL	\$ 32,460	\$ 476.16	\$ 5,713.92	17.60%	\$ 266.40	\$ 3,196.80	9.85%
200% FPL	\$ 43,280	\$ 476.16	\$ 5,713.92	13.20%	\$ 370.96	\$ 4,451.52	10.29%

3 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) 2026	PAWC Annual Proposed (\$) 2026	Burden (%) PAWC 2026	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026
1000 Gal.							
50% FPL	\$ 13,660	\$ 94.52	\$ 1,134.24	8.30%	\$ 17.00	\$ 204.00	1.49%
100% FPL	\$ 27,320	\$ 94.52	\$ 1,134.24	4.15%	\$ 31.17	\$ 374.04	1.37%
150% FPL	\$ 40,980	\$ 94.52	\$ 1,134.24	2.77%	\$ 52.90	\$ 634.80	1.55%
200% FPL	\$ 54,640	\$ 94.52	\$ 1,134.24	2.08%	\$ 73.67	\$ 884.04	1.62%
3000 Gal							
50% FPL	\$ 13,660	\$ 203.56	\$ 2,442.72	17.88%	\$ 36.60	\$ 439.20	3.22%
100% FPL	\$ 27,320	\$ 203.56	\$ 2,442.72	8.94%	\$ 67.11	\$ 805.32	2.95%
150% FPL	\$ 40,980	\$ 203.56	\$ 2,442.72	5.96%	\$ 113.90	\$ 1,366.80	3.34%
200% FPL	\$ 54,640	\$ 203.56	\$ 2,442.72	4.47%	\$ 158.61	\$ 1,903.32	3.48%
6000 Gal							
50% FPL	\$ 13,660	\$ 367.12	\$ 4,405.44	32.25%	\$ 66.00	\$ 792.00	5.80%
100% FPL	\$ 27,320	\$ 367.12	\$ 4,405.44	16.13%	\$ 121.02	\$ 1,452.24	5.32%
150% FPL	\$ 40,980	\$ 367.12	\$ 4,405.44	10.75%	\$ 205.40	\$ 2,464.80	6.01%
200% FPL	\$ 54,640	\$ 367.12	\$ 4,405.44	8.06%	\$ 286.02	\$ 3,432.24	6.28%
8000 Gal							
50% FPL	\$ 13,660	\$ 476.16	\$ 5,713.92	41.83%	\$ 85.60	\$ 1,027.20	7.52%
100% FPL	\$ 27,320	\$ 476.16	\$ 5,713.92	20.91%	\$ 156.96	\$ 1,883.52	6.89%
150% FPL	\$ 40,980	\$ 476.16	\$ 5,713.92	13.94%	\$ 266.40	\$ 3,196.80	7.80%
200% FPL	\$ 54,640	\$ 476.16	\$ 5,713.92	10.46%	\$ 370.96	\$ 4,451.52	8.15%

Note: Due to limitations in Excel, it was not possible to strike-out errors, as such, errors are noted in red on these pages.

4 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) 2026	PAWC Annual Proposed (\$) 2026	Burden (%) PAWC 2026	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026
1000 Gal.							
50% FPL	\$ 16,500	\$ 94.52	\$ 1,134.24	6.87%	\$ 17.00	\$ 204.00	1.24%
100% FPL	\$ 33,000	\$ 94.52	\$ 1,134.24	3.44%	\$ 31.17	\$ 374.04	1.13%
150% FPL	\$ 49,500	\$ 94.52	\$ 1,134.24	2.29%	\$ 52.90	\$ 634.80	1.28%
200% FPL	\$ 66,000	\$ 94.52	\$ 1,134.24	1.72%	\$ 73.67	\$ 884.04	1.34%
3000 Gal							
50% FPL	\$ 16,500	\$ 203.56	\$ 2,442.72	14.80%	\$ 36.60	\$ 439.20	2.66%
100% FPL	\$ 33,000	\$ 203.56	\$ 2,442.72	7.40%	\$ 67.11	\$ 805.32	2.44%
150% FPL	\$ 49,500	\$ 203.56	\$ 2,442.72	4.93%	\$ 113.90	\$ 1,366.80	2.76%
200% FPL	\$ 66,000	\$ 203.56	\$ 2,442.72	3.70%	\$ 158.61	\$ 1,903.32	2.88%
6000 Gal							
50% FPL	\$ 16,500	\$ 367.12	\$ 4,405.44	26.70%	\$ 66.00	\$ 792.00	4.80%
100% FPL	\$ 33,000	\$ 367.12	\$ 4,405.44	13.35%	\$ 121.02	\$ 1,452.24	4.40%
150% FPL	\$ 49,500	\$ 367.12	\$ 4,405.44	8.90%	\$ 205.40	\$ 2,464.80	4.98%
200% FPL	\$ 66,000	\$ 367.12	\$ 4,405.44	6.67%	\$ 286.02	\$ 3,432.24	5.20%
8000 Gal							
50% FPL	\$ 16,500	\$ 476.16	\$ 5,713.92	34.63%	\$ 85.60	\$ 1,027.20	6.23%
100% FPL	\$ 33,000	\$ 476.16	\$ 5,713.92	17.31%	\$ 156.96	\$ 1,883.52	5.71%
150% FPL	\$ 49,500	\$ 476.16	\$ 5,713.92	11.54%	\$ 266.40	\$ 3,196.80	6.46%
200% FPL	\$ 66,000	\$ 476.16	\$ 5,713.92	8.66%	\$ 370.96	\$ 4,451.52	6.74%

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2026 federal poverty guidelines.

See HHS Poverty Guidelines for 2026, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Note: Due to limitations in Excel, it was not possible to strike-out errors, as such, errors are noted in red on these pages.

CAUSE-PA Exhibit 1-c Water/Wastewater Burden Tables
Current H2O at Current Rates vs. Proposed H2O at Current Rates

2 Person Household							
	Income	PAWC Monthly (\$) CURRENT H2O	PAWC Annual (\$) CURRENT H2O	Burden (%) CURRENT H2O	PAWC Monthly (\$) PROPOSED H2O	PAWC Annual (\$) PROPOSED H2O	Burden (%) PAWC PROPOSED H2O
1000 Gal.							
50% FPL	\$ 10,820	\$ 12.31	\$ 147.72	1.37%	\$ 14.78	\$ 177.36	1.64%
100% FPL	\$ 21,640	\$ 23.30	\$ 279.60	1.29%	\$ 27.10	\$ 325.20	1.50%
150% FPL	\$ 32,460	\$ 39.18	\$ 470.16	1.45%	\$ 45.98	\$ 551.76	1.70%
200% FPL	\$ 43,280	\$ 56.24	\$ 674.88	1.56%	\$ 64.04	\$ 768.48	1.78%
3000 Gal							
50% FPL	\$ 10,820	\$ 28.67	\$ 344.04	3.18%	\$ 32.18	\$ 386.16	3.57%
100% FPL	\$ 21,640	\$ 52.40	\$ 628.80	2.91%	\$ 58.97	\$ 707.64	3.27%
150% FPL	\$ 32,460	\$ 89.00	\$ 1,068.00	3.29%	\$ 100.08	\$ 1,200.96	3.70%
200% FPL	\$ 43,280	\$ 123.50	\$ 1,482.00	3.42%	\$ 139.40	\$ 1,672.80	3.87%
6000 Gal							
50% FPL	\$ 10,820	\$ 53.21	\$ 638.52	5.90%	\$ 58.28	\$ 699.36	6.46%
100% FPL	\$ 21,640	\$ 96.05	\$ 1,152.60	5.33%	\$ 106.79	\$ 1,281.48	5.92%
150% FPL	\$ 32,460	\$ 163.73	\$ 1,964.76	6.05%	\$ 181.23	\$ 2,174.76	6.70%
200% FPL	\$ 43,280	\$ 224.39	\$ 2,692.68	6.22%	\$ 252.44	\$ 3,029.28	7.00%
8000 Gal							
50% FPL	\$ 10,820	\$ 69.57	\$ 834.84	7.72%	\$ 75.68	\$ 908.16	8.39%
100% FPL	\$ 21,640	\$ 125.15	\$ 1,501.80	6.94%	\$ 138.67	\$ 1,664.04	7.69%
150% FPL	\$ 32,460	\$ 213.55	\$ 2,562.60	7.89%	\$ 235.33	\$ 2,823.96	8.70%
200% FPL	\$ 43,280	\$ 291.65	\$ 3,499.80	8.09%	\$ 327.80	\$ 3,933.60	9.09%

3 Person Household							
	Income	PAWC Monthly (\$) CURRENT H2O	PAWC Annual (\$) CURRENT H2O	Burden (%) CURRENT H2O	PAWC Monthly (\$) PROPOSED H2O	PAWC Annual (\$) PROPOSED H2O	Burden (%) PAWC PROPOSED H2O
1000 Gal.							
50% FPL	\$ 13,660	\$ 12.31	\$ 147.72	1.08%	\$ 14.78	\$ 177.36	1.30%
100% FPL	\$ 27,320	\$ 23.30	\$ 279.60	1.02%	\$ 27.10	\$ 325.20	1.19%
150% FPL	\$ 40,980	\$ 39.18	\$ 470.16	1.15%	\$ 45.98	\$ 551.76	1.35%
200% FPL	\$ 54,640	\$ 56.24	\$ 674.88	1.24%	\$ 64.04	\$ 768.48	1.41%
3000 Gal							
50% FPL	\$ 13,660	\$ 28.67	\$ 344.04	2.52%	\$ 32.18	\$ 386.16	2.83%
100% FPL	\$ 27,320	\$ 52.40	\$ 628.80	2.30%	\$ 58.97	\$ 707.64	2.59%
150% FPL	\$ 40,980	\$ 89.00	\$ 1,068.00	2.61%	\$ 100.08	\$ 1,200.96	2.93%
200% FPL	\$ 54,640	\$ 123.50	\$ 1,482.00	2.71%	\$ 139.40	\$ 1,672.80	3.06%
6000 Gal							
50% FPL	\$ 13,660	\$ 53.21	\$ 638.52	4.67%	\$ 58.28	\$ 699.36	5.12%
100% FPL	\$ 27,320	\$ 96.05	\$ 1,152.60	4.22%	\$ 106.79	\$ 1,281.48	4.69%
150% FPL	\$ 40,980	\$ 163.73	\$ 1,964.76	4.79%	\$ 181.23	\$ 2,174.76	5.31%
200% FPL	\$ 54,640	\$ 224.39	\$ 2,692.68	4.93%	\$ 252.44	\$ 3,029.28	5.54%
8000 Gal							
50% FPL	\$ 13,660	\$ 69.57	\$ 834.84	6.11%	\$ 75.68	\$ 908.16	6.65%
100% FPL	\$ 27,320	\$ 125.15	\$ 1,501.80	5.50%	\$ 138.67	\$ 1,664.04	6.09%
150% FPL	\$ 40,980	\$ 213.55	\$ 2,562.60	6.25%	\$ 235.33	\$ 2,823.96	6.89%
200% FPL	\$ 54,640	\$ 291.65	\$ 3,499.80	6.41%	\$ 327.80	\$ 3,933.60	7.20%

Note: Due to limitations in Excel, it was not possible to strike-out errors, as such, errors are noted in red on these pages.

4 Person Household							
	Income	PAWC Monthly (\$) CURRENT H2O	PAWC Annual (\$) CURRENT H2O	Burden (%) CURRENT H2O	PAWC Monthly (\$) PROPOSED H2O	PAWC Annual (\$) PROPOSED H2O	Burden (%) PAWC PROPOSED H2O
1000 Gal.							
50% FPL	\$ 16,500	\$ 12.31	\$ 147.72	0.90%	\$ 14.78	\$ 177.36	1.07%
100% FPL	\$ 33,000	\$ 23.30	\$ 279.60	0.85%	\$ 27.10	\$ 325.20	0.99%
150% FPL	\$ 49,500	\$ 39.18	\$ 470.16	0.95%	\$ 45.98	\$ 551.76	1.11%
200% FPL	\$ 66,000	\$ 56.24	\$ 674.88	1.02%	\$ 64.04	\$ 768.48	1.16%
3000 Gal							
50% FPL	\$ 16,500	\$ 28.67	\$ 344.04	2.09%	\$ 32.18	\$ 386.16	2.34%
100% FPL	\$ 33,000	\$ 52.40	\$ 628.80	1.91%	\$ 58.97	\$ 707.64	2.14%
150% FPL	\$ 49,500	\$ 89.00	\$ 1,068.00	2.16%	\$ 100.08	\$ 1,200.96	2.43%
200% FPL	\$ 66,000	\$ 123.50	\$ 1,482.00	2.25%	\$ 139.40	\$ 1,672.80	2.53%
6000 Gal							
50% FPL	\$ 16,500	\$ 53.21	\$ 638.52	3.87%	\$ 58.28	\$ 699.36	4.24%
100% FPL	\$ 33,000	\$ 96.05	\$ 1,152.60	3.49%	\$ 106.79	\$ 1,281.48	3.88%
150% FPL	\$ 49,500	\$ 163.73	\$ 1,964.76	3.97%	\$ 181.23	\$ 2,174.76	4.39%
200% FPL	\$ 66,000	\$ 224.39	\$ 2,692.68	4.08%	\$ 252.44	\$ 3,029.28	4.59%
8000 Gal							
50% FPL	\$ 16,500	\$ 69.57	\$ 834.84	5.06%	\$ 75.68	\$ 908.16	5.50%
100% FPL	\$ 33,000	\$ 125.15	\$ 1,501.80	4.55%	\$ 138.67	\$ 1,664.04	5.04%
150% FPL	\$ 49,500	\$ 213.55	\$ 2,562.60	5.18%	\$ 235.33	\$ 2,823.96	5.70%
200% FPL	\$ 66,000	\$ 291.65	\$ 3,499.80	5.30%	\$ 327.80	\$ 3,933.60	5.96%

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2026 federal poverty guidelines.

See HHS Poverty Guidelines for 2026, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

Note: Due to limitations in Excel, it was not possible to strike-out errors, as such, errors are noted in red on these pages.

CAUSE-PA Exhibit 1-d Water/Wastewater Burden Tables
PAWC Proposed BDP vs. CAUSE-PA Proposed BDP

2 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026	CAUSE-PA Proposed Monthly (\$) H2O 2026	CAUSE-PA Proposed Annual (\$) H2O 2026	Burden (%) CAUSE-PA H2O 2026
1000 Gal.							
50% FPL	\$ 10,820	\$ 17.00	\$ 204.00	1.89%	\$ 8.18	\$ 98.16	0.91%
100% FPL	\$ 21,640	\$ 31.17	\$ 374.04	1.73%	\$ 13.63	\$ 163.56	0.76%
150% FPL	\$ 32,460	\$ 52.90	\$ 634.80	1.96%	\$ 27.27	\$ 327.24	1.01%
200% FPL	\$ 43,280	\$ 73.67	\$ 884.04	2.04%	\$ 40.89	\$ 490.68	1.13%
3000 Gal							
50% FPL	\$ 10,820	\$ 36.60	\$ 439.20	4.06%	\$ 24.54	\$ 294.48	2.72%
100% FPL	\$ 21,640	\$ 67.11	\$ 805.32	3.72%	\$ 40.89	\$ 490.68	2.27%
150% FPL	\$ 32,460	\$ 113.90	\$ 1,366.80	4.21%	\$ 81.81	\$ 981.72	3.02%
200% FPL	\$ 43,280	\$ 158.61	\$ 1,903.32	4.40%	\$ 122.67	\$ 1,472.04	3.40%
6000 Gal							
50% FPL	\$ 10,820	\$ 66.00	\$ 792.00	7.32%	\$ 49.08	\$ 588.96	5.44%
100% FPL	\$ 21,640	\$ 121.02	\$ 1,452.24	6.71%	\$ 81.78	\$ 981.36	4.53%
150% FPL	\$ 32,460	\$ 205.40	\$ 2,464.80	7.59%	\$ 163.62	\$ 1,963.44	6.05%
200% FPL	\$ 43,280	\$ 286.02	\$ 3,432.24	7.93%	\$ 245.34	\$ 2,944.08	6.80%
8000 Gal							
50% FPL	\$ 10,820	\$ 85.60	\$ 1,027.20	9.49%	\$ 65.44	\$ 785.28	7.26%
100% FPL	\$ 21,640	\$ 156.96	\$ 1,883.52	8.70%	\$ 109.04	\$ 1,308.48	6.05%
150% FPL	\$ 32,460	\$ 266.40	\$ 3,196.80	9.85%	\$ 218.16	\$ 2,617.92	8.07%
200% FPL	\$ 43,280	\$ 370.96	\$ 4,451.52	10.29%	\$ 327.12	\$ 3,925.44	9.07%

3 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026	CAUSE-PA Proposed Monthly (\$) H2O 2026	CAUSE-PA Proposed Annual (\$) H2O 2026	Burden (%) CAUSE-PA H2O 2026
1000 Gal.							
50% FPL	\$ 13,660	\$ 17.00	\$ 204.00	1.49%	\$ 8.18	\$ 98.16	0.72%
100% FPL	\$ 27,320	\$ 31.17	\$ 374.04	1.37%	\$ 13.63	\$ 163.56	0.60%
150% FPL	\$ 40,980	\$ 52.90	\$ 634.80	1.55%	\$ 27.27	\$ 327.24	0.80%
200% FPL	\$ 54,640	\$ 73.67	\$ 884.04	1.62%	\$ 40.89	\$ 490.68	0.90%
3000 Gal							
50% FPL	\$ 13,660	\$ 36.60	\$ 439.20	3.22%	\$ 24.54	\$ 294.48	2.16%
100% FPL	\$ 27,320	\$ 67.11	\$ 805.32	2.95%	\$ 40.89	\$ 490.68	1.80%
150% FPL	\$ 40,980	\$ 113.90	\$ 1,366.80	3.34%	\$ 81.81	\$ 981.72	2.40%
200% FPL	\$ 54,640	\$ 158.61	\$ 1,903.32	3.48%	\$ 122.67	\$ 1,472.04	2.69%
6000 Gal							
50% FPL	\$ 13,660	\$ 66.00	\$ 792.00	5.80%	\$ 49.08	\$ 588.96	4.31%
100% FPL	\$ 27,320	\$ 121.02	\$ 1,452.24	5.32%	\$ 81.78	\$ 981.36	3.59%
150% FPL	\$ 40,980	\$ 205.40	\$ 2,464.80	6.01%	\$ 163.62	\$ 1,963.44	4.79%
200% FPL	\$ 54,640	\$ 286.02	\$ 3,432.24	6.28%	\$ 245.34	\$ 2,944.08	5.39%
8000 Gal							
50% FPL	\$ 13,660	\$ 85.60	\$ 1,027.20	7.52%	\$ 65.44	\$ 785.28	5.75%
100% FPL	\$ 27,320	\$ 156.96	\$ 1,883.52	6.89%	\$ 109.04	\$ 1,308.48	4.79%
150% FPL	\$ 40,980	\$ 266.40	\$ 3,196.80	7.80%	\$ 218.16	\$ 2,617.92	6.39%
200% FPL	\$ 54,640	\$ 370.96	\$ 4,451.52	8.15%	\$ 327.12	\$ 3,925.44	7.18%

Note: Due to limitations in Excel, it was not possible to strike-out errors, as such, errors are noted in red on these pages.

4 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026	CAUSE-PA Proposed Monthly (\$) H2O 2026	CAUSE-PA Proposed Annual (\$) H2O 2026	Burden (%) CAUSE-PA H2O 2026
1000 Gal.							
50% FPL	\$ 16,500	\$ 17.00	\$ 204.00	1.24%	\$ 8.18	\$ 98.16	0.59%
100% FPL	\$ 33,000	\$ 31.17	\$ 374.04	1.13%	\$ 13.63	\$ 163.56	0.50%
150% FPL	\$ 49,500	\$ 52.90	\$ 634.80	1.28%	\$ 27.27	\$ 327.24	0.66%
200% FPL	\$ 66,000	\$ 73.67	\$ 884.04	1.34%	\$ 40.89	\$ 490.68	0.74%
3000 Gal							
50% FPL	\$ 16,500	\$ 36.60	\$ 439.20	2.66%	\$ 24.54	\$ 294.48	1.78%
100% FPL	\$ 33,000	\$ 67.11	\$ 805.32	2.44%	\$ 40.89	\$ 490.68	1.49%
150% FPL	\$ 49,500	\$ 113.90	\$ 1,366.80	2.76%	\$ 81.81	\$ 981.72	1.98%
200% FPL	\$ 66,000	\$ 158.61	\$ 1,903.32	2.88%	\$ 122.67	\$ 1,472.04	2.23%
6000 Gal							
50% FPL	\$ 16,500	\$ 66.00	\$ 792.00	4.80%	\$ 49.08	\$ 588.96	3.57%
100% FPL	\$ 33,000	\$ 121.02	\$ 1,452.24	4.40%	\$ 81.78	\$ 981.36	2.97%
150% FPL	\$ 49,500	\$ 205.40	\$ 2,464.80	4.98%	\$ 163.62	\$ 1,963.44	3.97%
200% FPL	\$ 66,000	\$ 286.02	\$ 3,432.24	5.20%	\$ 245.34	\$ 2,944.08	4.46%
8000 Gal							
50% FPL	\$ 16,500	\$ 85.60	\$ 1,027.20	6.23%	\$ 65.44	\$ 785.28	4.76%
100% FPL	\$ 33,000	\$ 156.96	\$ 1,883.52	5.71%	\$ 109.04	\$ 1,308.48	3.97%
150% FPL	\$ 49,500	\$ 266.40	\$ 3,196.80	6.46%	\$ 218.16	\$ 2,617.92	5.29%
200% FPL	\$ 66,000	\$ 370.96	\$ 4,451.52	6.74%	\$ 327.12	\$ 3,925.44	5.95%

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2026 federal poverty guidelines.

See HHS Poverty Guidelines for 2026, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

1 rates¹ and children may experience school absenteeism and increased interpersonal
2 conflict.² High water bills can also increase the likelihood that these households may resort to
3 expensive payday loans to pay for basic living expenses.³

4 Even at PAWC’s current rates, many families already must make difficult choices between
5 paying for utility services and other basic necessities – raising rates for such consumers will make
6 their ability to afford and/or obtain and retain such necessities more difficult.

7 **Q: Are low income customers enrolled in PAWC’s Bill Discount Program (BDP)**
8 **protected from the financial impact of the proposed rate increase?**

9 A: No. PAWC’s BDP will reduce but not eliminate the financial impact of PAWC’s proposed
10 rate increases for BDP participants. Unlike a Percentage of Income Program, which ties rates
11 directly to each participant’s household income, PAWC’s BDP is designed as a tiered rate discount
12 program which provides an aggregated group of participants a percentage discount on rates. When
13 rates increase, without a corresponding increase in the BDP discount, the resulting BDP charges
14 necessarily increase. In this case, PAWC has proposed to adjust its current discount levels, which
15 would have a marginal effect on bills for BDP enrollees at current rates, but would not sufficiently
16 compensate for the requested increase in rates.⁴ The effectiveness of PAWC’s BDP and both
17 current and proposed rates is dependent on approval of robust enhancements to the structure and
18 discounts provided under the BDP, and the ability of customers to enroll.

¹ Id.

² Low Income Household Water Assistance Program – Implementation and Impact Final Report. U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services (Internal Citations omitted)., <https://acf.gov/sites/default/files/documents/ocs/LIHWAP-Final-Impact-and-Implementation-Report.pdf> (Issued January 2025).

³ Income Volatility in the Service Sector at p. 9 (almost a quarter of consumers reporting week-to-week volatility report using payday lenders).

⁴ PAWC Statement No. 2 at 14: 20; CAUSE-PA Exhibit 1-c.

1 As illustrated in CAUSE-PA Exhibit 1, the existing BDP discount rates do not produce
2 consistent levels of affordability – especially for BDP participants with the lowest income with
3 higher usages. For example, a household of four at 150% FPL using 6,000 gallons per month is
4 currently charged a monthly bill of approximately \$163.73, or 3.97% of gross household income
5 – just barely what is considered affordable by that particular metric.¹

6 As currently structured, PAWC’s BDP is not providing affordable bills or precise levels of
7 affordability for its participants – especially for higher usage customers. This is problematic, as,
8 in addition to the likelihood of low income households living in homes with leaks and
9 inefficiencies, these high bills disproportionately impact larger and/or multi-generational
10 households. Unlike typical electric and gas usage, water usage varies significantly by the size of
11 the household, making it even more critical to ensure that rate assistance is individualized to the
12 household based on their ability to pay.²

13 **Q: Is PAWC proposing any changes to its BDP?**

14 A: Yes. The Company is proposing to adjust its discount levels for both water and wastewater
15 as shown in the Table below.

16 **Table 12: Proposed BDP Discounts³**

FPL	Proposed Water (Fixed and Volumetric)	Proposed Wastewater (Fixed and Volumetric)
0-50%	82%	85%
51-100%	67%	73%
101-150%	44%	55%
151-200%	22%	37%

¹ CAUSE-PA Exhibit 1-c.

² Water/Color Report at 28.

³ PAWC Statement No. 2 at 14: 20.

1 **Q: Do you support PAWC’s proposed BDP changes?**

2 A: As shown in CAUSE-PA Exhibit 1-c, the proposed changes to PAWC’s BDP discount
 3 levels will result in higher bills for some BDP participants even at current rates and do not provide
 4 consistent affordability at proposed rates.

5 Analysis provided by PAWC similarly shows that average bills for BDP customers will
 6 continue to be high. For example, PAWC reports the following BDP bill amounts at proposed rates
 7 and proposed discount levels:

8 **Table 13: Proposed BDP Bills, 5,000 gal./month¹**

	Proposed BDP Bill – Water	Proposed BDP Bill – Wastewater	Proposed BDP Bill - Combined
Tier 1 (0-50% FPL)	\$24.36	26.58	\$50.94
Tier 2 (51-100% FPL)	\$44.66	47.85	\$92.51
Tier 3 (101-150% FPL)	\$75.79	\$79.75	\$155.54
Tier 4 (151-200% FPL)	\$105.57	\$111.65	\$217.22

9 For example, a household of three using 5,000 gallons per month, squarely in the middle of Tier
 10 3 with monthly gross income of \$2,846 would have a water/wastewater burden of 5.5% at
 11 proposed rates, which is not considered affordable according to the Company’s own metrics. As
 12 discussed above regarding standards of affordability, for lower income households, even a
 13 burden of 4% can be a significant financial strain on the household.

14 **Q: Are you recommending any reforms to PAWC’s BDP?**

15 A: Yes. As discussed above, PAWC’s current and proposed discount levels provide
 16 inadequate rate assistance and inequitable bills, particularly for customers with higher usage levels

¹ PAWC Response to CAUSE-PA 01-026, Attachment, and 01-027, Attachment, attached hereto at Appendix B.

1 upgrades, it should be required to ensure the upgrades will support implementation of a
 2 PIP structure in the future.

3 In the interim, I recommend the following BDP structure and discount levels to better
 4 ensure the program produces affordable water/wastewater burdens and participants stay connected
 5 to services:

6 **Table 14: Recommended BDP Discounts**

	Water		Wastewater	
	Fixed Charge	Volumetric Charge	Fixed Charge	Volumetric Charge
Tier 1 (0-50% FPL)	100%	85%	100%	85%
Tier 2 (51-100% FPL)	100%	75%	100%	75%
Tier 3 (101-150% FPL)	100%	50%	100%	50%
Tier 4 (151-200% FPL)	100%	25%	100%	25%

7 Pursuant to this proposal, customers with income between 0%-200% FPL would see
 8 marked improvements to affordability and reductions in water/wastewater burdens. Under the
 9 Company’s BDP proposal, a family of four at 150% FPL using 50 gallons per person/day, or
 10 approximately 6,000 gallons/month, will be burdened with combined water/wastewater burdens
 11 of 4.42%,¹ This exceeds the 4% affordability burden standard discussed above. By comparison,
 12 under my proposed modifications shown in Table 12, the same BDP participant at proposed rates—
 13 with the same household size, usage, and FPL – will have a 3.97% combined water/wastewater
 14 burden. CAUSE-PA Exhibit 1 provides additional information related to the resulting burdens
 15 under the proposed BDP structure I have recommended above.

16 At the proposed discount levels I have outlined above, BDP participants will be charged
 17 rates that are more consistently affordable, regardless of relative income level, household size,

¹ CAUSE-PA Exhibit 1-b, 1-c.

18 and usage levels, I note that my recommendations within the context of this proceeding should
19 not be

CAUSE-PA Exhibit 1-b Water/Wastewater Burden Tables
Proposed Full Tariff vs. PAWC Proposed BDP

2 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) 2026	PAWC Annual Proposed (\$) 2026	Burden (%) PAWC 2026	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026
1000 Gal.							
50% FPL	\$ 10,820	\$ 94.52	\$ 1,134.24	10.48%	\$ 15.46	\$ 185.52	1.71%
100% FPL	\$ 21,640	\$ 94.52	\$ 1,134.24	5.24%	\$ 28.08	\$ 336.96	1.56%
150% FPL	\$ 32,460	\$ 94.52	\$ 1,134.24	3.49%	\$ 47.24	\$ 566.88	1.75%
200% FPL	\$ 43,280	\$ 94.52	\$ 1,134.24	2.62%	\$ 65.96	\$ 791.52	1.83%
3000 Gal							
50% FPL	\$ 10,820	\$ 203.56	\$ 2,442.72	22.58%	\$ 33.18	\$ 398.16	3.68%
100% FPL	\$ 21,640	\$ 203.56	\$ 2,442.72	11.29%	\$ 60.24	\$ 722.88	3.34%
150% FPL	\$ 32,460	\$ 203.56	\$ 2,442.72	7.53%	\$ 101.32	\$ 1,215.84	3.75%
200% FPL	\$ 43,280	\$ 203.56	\$ 2,442.72	5.64%	\$ 141.48	\$ 1,697.76	3.92%
6000 Gal							
50% FPL	\$ 10,820	\$ 367.12	\$ 4,405.44	40.72%	\$ 59.76	\$ 717.12	6.63%
100% FPL	\$ 21,640	\$ 367.12	\$ 4,405.44	20.36%	\$ 108.48	\$ 1,301.76	6.02%
150% FPL	\$ 32,460	\$ 367.12	\$ 4,405.44	13.57%	\$ 182.44	\$ 2,189.28	6.74%
200% FPL	\$ 43,280	\$ 367.12	\$ 4,405.44	10.18%	\$ 254.76	\$ 3,057.12	7.06%
8000 Gal							
50% FPL	\$ 10,820	\$ 476.16	\$ 5,713.92	52.81%	\$ 77.48	\$ 929.76	8.59%
100% FPL	\$ 21,640	\$ 476.16	\$ 5,713.92	26.40%	\$ 140.64	\$ 1,687.68	7.80%
150% FPL	\$ 32,460	\$ 476.16	\$ 5,713.92	17.60%	\$ 236.52	\$ 2,838.24	8.74%
200% FPL	\$ 43,280	\$ 476.16	\$ 5,713.92	13.20%	\$ 330.28	\$ 3,963.36	9.16%

3 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) 2026	PAWC Annual Proposed (\$) 2026	Burden (%) PAWC 2026	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026
1000 Gal.							
50% FPL	\$ 13,660	\$ 94.52	\$ 1,134.24	8.30%	\$ 15.46	\$ 185.52	1.36%
100% FPL	\$ 27,320	\$ 94.52	\$ 1,134.24	4.15%	\$ 28.08	\$ 336.96	1.23%
150% FPL	\$ 40,980	\$ 94.52	\$ 1,134.24	2.77%	\$ 47.24	\$ 566.88	1.38%
200% FPL	\$ 54,640	\$ 94.52	\$ 1,134.24	2.08%	\$ 65.96	\$ 791.52	1.45%
3000 Gal							
50% FPL	\$ 13,660	\$ 203.56	\$ 2,442.72	17.88%	\$ 33.18	\$ 398.16	2.91%
100% FPL	\$ 27,320	\$ 203.56	\$ 2,442.72	8.94%	\$ 60.24	\$ 722.88	2.65%
150% FPL	\$ 40,980	\$ 203.56	\$ 2,442.72	5.96%	\$ 101.32	\$ 1,215.84	2.97%
200% FPL	\$ 54,640	\$ 203.56	\$ 2,442.72	4.47%	\$ 141.48	\$ 1,697.76	3.11%
6000 Gal							
50% FPL	\$ 13,660	\$ 367.12	\$ 4,405.44	32.25%	\$ 59.76	\$ 717.12	5.25%
100% FPL	\$ 27,320	\$ 367.12	\$ 4,405.44	16.13%	\$ 108.48	\$ 1,301.76	4.76%
150% FPL	\$ 40,980	\$ 367.12	\$ 4,405.44	10.75%	\$ 182.44	\$ 2,189.28	5.34%
200% FPL	\$ 54,640	\$ 367.12	\$ 4,405.44	8.06%	\$ 254.76	\$ 3,057.12	5.60%
8000 Gal							
50% FPL	\$ 13,660	\$ 476.16	\$ 5,713.92	41.83%	\$ 77.48	\$ 929.76	6.81%
100% FPL	\$ 27,320	\$ 476.16	\$ 5,713.92	20.91%	\$ 140.64	\$ 1,687.68	6.18%
150% FPL	\$ 40,980	\$ 476.16	\$ 5,713.92	13.94%	\$ 236.52	\$ 2,838.24	6.93%
200% FPL	\$ 54,640	\$ 476.16	\$ 5,713.92	10.46%	\$ 330.28	\$ 3,963.36	7.25%

4 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) 2026	PAWC Annual Proposed (\$) 2026	Burden (%) PAWC 2026	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026
1000 Gal.							
50% FPL	\$ 16,500	\$ 94.52	\$ 1,134.24	6.87%	\$ 15.46	\$ 185.52	1.12%
100% FPL	\$ 33,000	\$ 94.52	\$ 1,134.24	3.44%	\$ 28.08	\$ 336.96	1.02%
150% FPL	\$ 49,500	\$ 94.52	\$ 1,134.24	2.29%	\$ 47.24	\$ 566.88	1.15%
200% FPL	\$ 66,000	\$ 94.52	\$ 1,134.24	1.72%	\$ 65.96	\$ 791.52	1.20%
3000 Gal							
50% FPL	\$ 16,500	\$ 203.56	\$ 2,442.72	14.80%	\$ 33.18	\$ 398.16	2.41%
100% FPL	\$ 33,000	\$ 203.56	\$ 2,442.72	7.40%	\$ 60.24	\$ 722.88	2.19%
150% FPL	\$ 49,500	\$ 203.56	\$ 2,442.72	4.93%	\$ 101.32	\$ 1,215.84	2.46%
200% FPL	\$ 66,000	\$ 203.56	\$ 2,442.72	3.70%	\$ 141.48	\$ 1,697.76	2.57%
6000 Gal							
50% FPL	\$ 16,500	\$ 367.12	\$ 4,405.44	26.70%	\$ 59.76	\$ 717.12	4.35%
100% FPL	\$ 33,000	\$ 367.12	\$ 4,405.44	13.35%	\$ 108.48	\$ 1,301.76	3.94%
150% FPL	\$ 49,500	\$ 367.12	\$ 4,405.44	8.90%	\$ 182.44	\$ 2,189.28	4.42%
200% FPL	\$ 66,000	\$ 367.12	\$ 4,405.44	6.67%	\$ 254.76	\$ 3,057.12	4.63%
8000 Gal							
50% FPL	\$ 16,500	\$ 476.16	\$ 5,713.92	34.63%	\$ 77.48	\$ 929.76	5.63%
100% FPL	\$ 33,000	\$ 476.16	\$ 5,713.92	17.31%	\$ 140.64	\$ 1,687.68	5.11%
150% FPL	\$ 49,500	\$ 476.16	\$ 5,713.92	11.54%	\$ 236.52	\$ 2,838.24	5.73%
200% FPL	\$ 66,000	\$ 476.16	\$ 5,713.92	8.66%	\$ 330.28	\$ 3,963.36	6.01%

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2026 federal poverty guidelines.

See HHS Poverty Guidelines for 2026, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

CAUSE-PA Exhibit 1-c Water/Wastewater Burden Tables
Current H2O at Current Rates vs. Proposed H2O at Current Rates

2 Person Household							
	Income	PAWC Monthly (\$) CURRENT H2O	PAWC Annual (\$) CURRENT H2O	Burden (%) CURRENT H2O	PAWC Monthly (\$) PROPOSED H2O	PAWC Annual (\$) PROPOSED H2O	Burden (%) PAWC PROPOSED H2O
1000 Gal.							
50% FPL	\$ 10,820	\$ 12.31	\$ 147.72	1.37%	\$ 13.44	\$ 161.28	1.49%
100% FPL	\$ 21,640	\$ 23.30	\$ 279.60	1.29%	\$ 24.42	\$ 293.04	1.35%
150% FPL	\$ 32,460	\$ 39.18	\$ 470.16	1.45%	\$ 41.08	\$ 492.96	1.52%
200% FPL	\$ 43,280	\$ 56.24	\$ 674.88	1.56%	\$ 57.36	\$ 688.32	1.59%
3000 Gal							
50% FPL	\$ 10,820	\$ 28.67	\$ 344.04	3.18%	\$ 29.06	\$ 348.72	3.22%
100% FPL	\$ 21,640	\$ 52.40	\$ 628.80	2.91%	\$ 52.76	\$ 633.12	2.93%
150% FPL	\$ 32,460	\$ 89.00	\$ 1,068.00	3.29%	\$ 88.68	\$ 1,064.16	3.28%
200% FPL	\$ 43,280	\$ 123.50	\$ 1,482.00	3.42%	\$ 123.86	\$ 1,486.32	3.43%
6000 Gal							
50% FPL	\$ 10,820	\$ 53.21	\$ 638.52	5.90%	\$ 52.49	\$ 629.88	5.82%
100% FPL	\$ 21,640	\$ 96.05	\$ 1,152.60	5.33%	\$ 95.27	\$ 1,143.24	5.28%
150% FPL	\$ 32,460	\$ 163.73	\$ 1,964.76	6.05%	\$ 160.08	\$ 1,920.96	5.92%
200% FPL	\$ 43,280	\$ 224.39	\$ 2,692.68	6.22%	\$ 223.61	\$ 2,683.32	6.20%
8000 Gal							
50% FPL	\$ 10,820	\$ 69.57	\$ 834.84	7.72%	\$ 68.11	\$ 817.32	7.55%
100% FPL	\$ 21,640	\$ 125.15	\$ 1,501.80	6.94%	\$ 123.61	\$ 1,483.32	6.85%
150% FPL	\$ 32,460	\$ 213.55	\$ 2,562.60	7.89%	\$ 207.68	\$ 2,492.16	7.68%
200% FPL	\$ 43,280	\$ 291.65	\$ 3,499.80	8.09%	\$ 290.11	\$ 3,481.32	8.04%

3 Person Household							
	Income	PAWC Monthly (\$) CURRENT H2O	PAWC Annual (\$) CURRENT H2O	Burden (%) CURRENT H2O	PAWC Monthly (\$) PROPOSED H2O	PAWC Annual (\$) PROPOSED H2O	Burden (%) PAWC PROPOSED H2O
1000 Gal.							
50% FPL	\$ 13,660	\$ 12.31	\$ 147.72	1.08%	\$ 13.44	\$ 161.28	1.18%
100% FPL	\$ 27,320	\$ 23.30	\$ 279.60	1.02%	\$ 24.42	\$ 293.04	1.07%
150% FPL	\$ 40,980	\$ 39.18	\$ 470.16	1.15%	\$ 41.08	\$ 492.96	1.20%
200% FPL	\$ 54,640	\$ 56.24	\$ 674.88	1.24%	\$ 57.36	\$ 688.32	1.26%
3000 Gal							
50% FPL	\$ 13,660	\$ 28.67	\$ 344.04	2.52%	\$ 29.06	\$ 348.72	2.55%
100% FPL	\$ 27,320	\$ 52.40	\$ 628.80	2.30%	\$ 52.76	\$ 633.12	2.32%
150% FPL	\$ 40,980	\$ 89.00	\$ 1,068.00	2.61%	\$ 88.68	\$ 1,064.16	2.60%
200% FPL	\$ 54,640	\$ 123.50	\$ 1,482.00	2.71%	\$ 123.86	\$ 1,486.32	2.72%
6000 Gal							
50% FPL	\$ 13,660	\$ 53.21	\$ 638.52	4.67%	\$ 52.49	\$ 629.88	4.61%
100% FPL	\$ 27,320	\$ 96.05	\$ 1,152.60	4.22%	\$ 95.27	\$ 1,143.24	4.18%
150% FPL	\$ 40,980	\$ 163.73	\$ 1,964.76	4.79%	\$ 160.08	\$ 1,920.96	4.69%
200% FPL	\$ 54,640	\$ 224.39	\$ 2,692.68	4.93%	\$ 223.61	\$ 2,683.32	4.91%
8000 Gal							
50% FPL	\$ 13,660	\$ 69.57	\$ 834.84	6.11%	\$ 68.11	\$ 817.32	5.98%
100% FPL	\$ 27,320	\$ 125.15	\$ 1,501.80	5.50%	\$ 123.61	\$ 1,483.32	5.43%
150% FPL	\$ 40,980	\$ 213.55	\$ 2,562.60	6.25%	\$ 207.68	\$ 2,492.16	6.08%
200% FPL	\$ 54,640	\$ 291.65	\$ 3,499.80	6.41%	\$ 290.11	\$ 3,481.32	6.37%

4 Person Household								
	Income	PAWC Monthly (\$) CURRENT H2O	PAWC Annual (\$) CURRENT H2O	Burden (%) CURRENT H2O	PAWC Monthly (\$) PROPOSED H2O	PAWC Annual (\$) PROPOSED H2O	Burden (%) PAWC PROPOSED H2O	
1000 Gal.								
50% FPL	\$ 16,500	\$ 12.31	\$ 147.72	0.90%	\$ 13.44	\$ 161.28	0.98%	
100% FPL	\$ 33,000	\$ 23.30	\$ 279.60	0.85%	\$ 24.42	\$ 293.04	0.89%	
150% FPL	\$ 49,500	\$ 39.18	\$ 470.16	0.95%	\$ 41.08	\$ 492.96	1.00%	
200% FPL	\$ 66,000	\$ 56.24	\$ 674.88	1.02%	\$ 57.36	\$ 688.32	1.04%	
3000 Gal								
50% FPL	\$ 16,500	\$ 28.67	\$ 344.04	2.09%	\$ 29.06	\$ 348.72	2.11%	
100% FPL	\$ 33,000	\$ 52.40	\$ 628.80	1.91%	\$ 52.76	\$ 633.12	1.92%	
150% FPL	\$ 49,500	\$ 89.00	\$ 1,068.00	2.16%	\$ 88.68	\$ 1,064.16	2.15%	
200% FPL	\$ 66,000	\$ 123.50	\$ 1,482.00	2.25%	\$ 123.86	\$ 1,486.32	2.25%	
6000 Gal								
50% FPL	\$ 16,500	\$ 53.21	\$ 638.52	3.87%	\$ 52.49	\$ 629.88	3.82%	
100% FPL	\$ 33,000	\$ 96.05	\$ 1,152.60	3.49%	\$ 95.27	\$ 1,143.24	3.46%	
150% FPL	\$ 49,500	\$ 163.73	\$ 1,964.76	3.97%	\$ 160.08	\$ 1,920.96	3.88%	
200% FPL	\$ 66,000	\$ 224.39	\$ 2,692.68	4.08%	\$ 223.61	\$ 2,683.32	4.07%	
8000 Gal								
50% FPL	\$ 16,500	\$ 69.57	\$ 834.84	5.06%	\$ 68.11	\$ 817.32	4.95%	
100% FPL	\$ 33,000	\$ 125.15	\$ 1,501.80	4.55%	\$ 123.61	\$ 1,483.32	4.49%	
150% FPL	\$ 49,500	\$ 213.55	\$ 2,562.60	5.18%	\$ 207.68	\$ 2,492.16	5.03%	
200% FPL	\$ 66,000	\$ 291.65	\$ 3,499.80	5.30%	\$ 290.11	\$ 3,481.32	5.27%	

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2026 federal poverty guidelines.

See HHS Poverty Guidelines for 2026, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

CAUSE-PA Exhibit 1-d Water/Wastewater Burden Tables
PAWC Proposed BDP vs. CAUSE-PA Proposed BDP

2 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026	CAUSE-PA Proposed Monthly (\$) H2O 2026	CAUSE-PA Proposed Annual (\$) H2O 2026	Burden (%) CAUSE-PA H2O 2026
1000 Gal.							
50% FPL	\$ 10,820	\$ 15.46	\$ 185.52	1.71%	\$ 8.18	\$ 98.16	0.91%
100% FPL	\$ 21,640	\$ 28.08	\$ 336.96	1.56%	\$ 13.63	\$ 163.56	0.76%
150% FPL	\$ 32,460	\$ 47.24	\$ 566.88	1.75%	\$ 27.27	\$ 327.24	1.01%
200% FPL	\$ 43,280	\$ 65.96	\$ 791.52	1.83%	\$ 40.89	\$ 490.68	1.13%
3000 Gal							
50% FPL	\$ 10,820	\$ 33.18	\$ 398.16	3.68%	\$ 24.54	\$ 294.48	2.72%
100% FPL	\$ 21,640	\$ 60.24	\$ 722.88	3.34%	\$ 40.89	\$ 490.68	2.27%
150% FPL	\$ 32,460	\$ 101.32	\$ 1,215.84	3.75%	\$ 81.81	\$ 981.72	3.02%
200% FPL	\$ 43,280	\$ 141.48	\$ 1,697.76	3.92%	\$ 122.67	\$ 1,472.04	3.40%
6000 Gal							
50% FPL	\$ 10,820	\$ 59.76	\$ 717.12	6.63%	\$ 49.08	\$ 588.96	5.44%
100% FPL	\$ 21,640	\$ 108.48	\$ 1,301.76	6.02%	\$ 81.78	\$ 981.36	4.53%
150% FPL	\$ 32,460	\$ 182.44	\$ 2,189.28	6.74%	\$ 163.62	\$ 1,963.44	6.05%
200% FPL	\$ 43,280	\$ 254.76	\$ 3,057.12	7.06%	\$ 245.34	\$ 2,944.08	6.80%
8000 Gal							
50% FPL	\$ 10,820	\$ 77.48	\$ 929.76	8.59%	\$ 65.44	\$ 785.28	7.26%
100% FPL	\$ 21,640	\$ 140.64	\$ 1,687.68	7.80%	\$ 109.04	\$ 1,308.48	6.05%
150% FPL	\$ 32,460	\$ 236.52	\$ 2,838.24	8.74%	\$ 218.16	\$ 2,617.92	8.07%
200% FPL	\$ 43,280	\$ 330.28	\$ 3,963.36	9.16%	\$ 327.12	\$ 3,925.44	9.07%

3 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026	CAUSE-PA Proposed Monthly (\$) H2O 2026	CAUSE-PA Proposed Annual (\$) H2O 2026	Burden (%) CAUSE-PA H2O 2026
1000 Gal.							
50% FPL	\$ 13,660	\$ 15.46	\$ 185.52	1.36%	\$ 8.18	\$ 98.16	0.72%
100% FPL	\$ 27,320	\$ 28.08	\$ 336.96	1.23%	\$ 13.63	\$ 163.56	0.60%
150% FPL	\$ 40,980	\$ 47.24	\$ 566.88	1.38%	\$ 27.27	\$ 327.24	0.80%
200% FPL	\$ 54,640	\$ 65.96	\$ 791.52	1.45%	\$ 40.89	\$ 490.68	0.90%
3000 Gal							
50% FPL	\$ 13,660	\$ 33.18	\$ 398.16	2.91%	\$ 24.54	\$ 294.48	2.16%
100% FPL	\$ 27,320	\$ 60.24	\$ 722.88	2.65%	\$ 40.89	\$ 490.68	1.80%
150% FPL	\$ 40,980	\$ 101.32	\$ 1,215.84	2.97%	\$ 81.81	\$ 981.72	2.40%
200% FPL	\$ 54,640	\$ 141.48	\$ 1,697.76	3.11%	\$ 122.67	\$ 1,472.04	2.69%
6000 Gal							
50% FPL	\$ 13,660	\$ 59.76	\$ 717.12	5.25%	\$ 49.08	\$ 588.96	4.31%
100% FPL	\$ 27,320	\$ 108.48	\$ 1,301.76	4.76%	\$ 81.78	\$ 981.36	3.59%
150% FPL	\$ 40,980	\$ 182.44	\$ 2,189.28	5.34%	\$ 163.62	\$ 1,963.44	4.79%
200% FPL	\$ 54,640	\$ 254.76	\$ 3,057.12	5.60%	\$ 245.34	\$ 2,944.08	5.39%
8000 Gal							
50% FPL	\$ 13,660	\$ 77.48	\$ 929.76	6.81%	\$ 65.44	\$ 785.28	5.75%
100% FPL	\$ 27,320	\$ 140.64	\$ 1,687.68	6.18%	\$ 109.04	\$ 1,308.48	4.79%
150% FPL	\$ 40,980	\$ 236.52	\$ 2,838.24	6.93%	\$ 218.16	\$ 2,617.92	6.39%
200% FPL	\$ 54,640	\$ 330.28	\$ 3,963.36	7.25%	\$ 327.12	\$ 3,925.44	7.18%

4 Person Household							
	Annual Income	PAWC Proposed Monthly (\$) H2O 2026	PAWC Proposed Annual (\$) H2O 2026	Burden (%) PAWC H2O 2026	CAUSE-PA Proposed Monthly (\$) H2O 2026	CAUSE-PA Proposed Annual (\$) H2O 2026	Burden (%) CAUSE-PA H2O 2026
1000 Gal.							
50% FPL	\$ 16,500	\$ 15.46	\$ 185.52	1.12%	\$ 8.18	\$ 98.16	0.59%
100% FPL	\$ 33,000	\$ 28.08	\$ 336.96	1.02%	\$ 13.63	\$ 163.56	0.50%
150% FPL	\$ 49,500	\$ 47.24	\$ 566.88	1.15%	\$ 27.27	\$ 327.24	0.66%
200% FPL	\$ 66,000	\$ 65.96	\$ 791.52	1.20%	\$ 40.89	\$ 490.68	0.74%
3000 Gal							
50% FPL	\$ 16,500	\$ 33.18	\$ 398.16	2.41%	\$ 24.54	\$ 294.48	1.78%
100% FPL	\$ 33,000	\$ 60.24	\$ 722.88	2.19%	\$ 40.89	\$ 490.68	1.49%
150% FPL	\$ 49,500	\$ 101.32	\$ 1,215.84	2.46%	\$ 81.81	\$ 981.72	1.98%
200% FPL	\$ 66,000	\$ 141.48	\$ 1,697.76	2.57%	\$ 122.67	\$ 1,472.04	2.23%
6000 Gal							
50% FPL	\$ 16,500	\$ 59.76	\$ 717.12	4.35%	\$ 49.08	\$ 588.96	3.57%
100% FPL	\$ 33,000	\$ 108.48	\$ 1,301.76	3.94%	\$ 81.78	\$ 981.36	2.97%
150% FPL	\$ 49,500	\$ 182.44	\$ 2,189.28	4.42%	\$ 163.62	\$ 1,963.44	3.97%
200% FPL	\$ 66,000	\$ 254.76	\$ 3,057.12	4.63%	\$ 245.34	\$ 2,944.08	4.46%
8000 Gal							
50% FPL	\$ 16,500	\$ 77.48	\$ 929.76	5.63%	\$ 65.44	\$ 785.28	4.76%
100% FPL	\$ 33,000	\$ 140.64	\$ 1,687.68	5.11%	\$ 109.04	\$ 1,308.48	3.97%
150% FPL	\$ 49,500	\$ 236.52	\$ 2,838.24	5.73%	\$ 218.16	\$ 2,617.92	5.29%
200% FPL	\$ 66,000	\$ 330.28	\$ 3,963.36	6.01%	\$ 327.12	\$ 3,925.44	5.95%

**Income levels represent 50%, 100%, 150%, and 200% FPL, using 2026 federal poverty guidelines.

See HHS Poverty Guidelines for 2026, available at: <https://aspe.hhs.gov/topics/poverty-economic-mobility/poverty-guidelines>

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission	:	
	:	
v.	:	Docket Nos. R-2025-3057983
	:	R-2025-3058051
Pennsylvania-American Water Company	:	
	:	

SURREBUTTAL TESTIMONY OF HARRY S. GELLER, ESQ.
ON BEHALF OF
THE COALITION FOR AFFORDABLE UTILITY SERVICES AND
ENERGY EFFICIENCY IN PENNSYLVANIA (“CAUSE-PA”)

March 13, 2026

1 **PREPARED SURREBUTTAL TESTIMONY OF HARRY S. GELLER, ESQ.**

2 **I. INTRODUCTION**

3 **Q: Please state your name, occupation, and business address.**

4 A: My name is Harry S. Geller. I am retired from my former position as Executive Director
5 of the Pennsylvania Utility Law Project, but have maintained an office at 118 Locust St.,
6 Harrisburg, PA 17101, for the purpose of providing consulting services and assistance to low
7 income individuals and the organizations which represent them in utility and energy matters.

8 **Q: Did you previously submit testimony in this proceeding?**

9 A: Yes. I submitted direct testimony that is pre-marked as CAUSE-PA Statement 1.

10 **Q: What is the purpose of your surrebuttal testimony?**

11 A: My surrebuttal testimony responds to the rebuttal testimony provided by witnesses Deba
12 F. Ather (PAWC St. 9-R), Dr. Christina E. Chard (PAWC St. 2-R), Matthew W. Prine (PAWC St.
13 15-R), and Max McClellan (PAWC St. 10-R) on behalf of the Pennsylvania-American Water
14 Company (PAWC or the Company). Specifically, I respond to the following:

- 15 • PAWC witness Ather's contentions about PAWC's Affordability Analyses. I continue
16 to submit that PAWC does not adequately assess low income customer needs or
17 widespread rate unaffordability for these customers across its service territory.
- 18 • PAWC witness Chard's analysis of my recommended improvements to PAWC's low
19 income programming, my opposition to PAWC's Rental Assistance Pilot Program
20 (RAPP) proposal and CAP Rider proposal, and my recommendation that the Company
21 file a Universal Service Plan concurrent with its next rate case filing.
- 22 • PAWC witness Prine's testimony regarding my recommended enhancements to
23 customer screening protocols for low income assistance programs, as well as the
24 development of a comprehensive leak repair program.
- 25 • PAWC witness Max McClellan's testimony regarding the Company's deduct
26 adjustment proposal and fixed customer charge proposal.

1 In sum, my surrebuttal testimony addresses the failure of PAWC witness rebuttal testimony
2 to acknowledge and address the significant and distinct economic and usage differences of the low
3 income consumers within its service territory from its general customer base, the negative effects
4 that its current and proposed rates have on its low income customers, the company's unwillingness
5 to implement modifications to improve affordability, and its unwillingness to adopt standard, best
6 practice universal service programs and policies not explicitly required in statute - while at the
7 same time requesting implementation of a universal service rider as if it were administering a
8 statutorily mandated universal program.

9 This surrebuttal testimony is not intended to address every issue raised or otherwise
10 discussed by other parties' witnesses in rebuttal testimony. Absence of a response to any specific
11 recommendation or position of any witness does not indicate my agreement. Unless required for
12 context in providing a further response to rebuttal testimony, I will not reiterate the extensive
13 arguments and evidence that I provided in my direct testimony. To the extent an argument raised
14 by any party in rebuttal testimony is already sufficiently addressed in my direct testimony, I do not
15 intend to respond, and stand on the evaluation, analysis, and recommendations contained in my
16 direct testimony.

17 **II. RESPONSE TO PAWC EXPERT WITNESS DEBA F. ATHER (PAWC St. 9-R)**

18 **Q: Please summarize the rebuttal testimony of PAWC's expert witness, Deba F. Ather,**
19 **related to your analysis of the Company's affordability analyses.**

20 A: In my direct testimony, I explained my concerns that the Company's affordability analyses
21 do not adequately assess low income customer needs or widespread rate unaffordability for these
22 customers across its service territory.¹

¹ CAUSE-PA St. 1 at 32.

1 Ms. Ather states in her rebuttal that I am mistaken about the application of median
2 household income (MHI) in relationship to the Company’s analyses.² Ms. Ather attempts to
3 reframe the concept of affordability as a hypothetical question of access to a discount program
4 rather than as measured by the actual experience of PAWC customers. Specifically, she asserts
5 that the test should be whether a “robust and sustainable tariff program, like the BDP, is in place
6 to help customers with affordability issues and provides them with the opportunity for Basic Water
7 Service (BWS) at a level deemed to be affordable.”³ Essentially, arguing that the mere existence
8 of a bill discount program means the Company has addressed affordability. Ms. Ather further
9 argues that the Company’s outreach and enrollment efforts are sufficient, and seems to imply that
10 the current low enrollment levels⁴ can be ascribed to “individual customer’s enrollment decisions
11 and eligibility determination.”⁵ Ms. Ather, thus, appears to take the position that all PAWC must
12 do is implement a bill discount program and that subsequent access to, enrollment, and success in
13 the program is solely a function of that customer’s initiative.

14 Finally, Ms. Ather takes issue with my analysis of customers’ varying usage levels⁶ and
15 claims that my own affordability analysis, submitted as CAUSE-PA Exhibit 1, lacks context,
16 stating that it lacks connection between usage levels assumed in the analysis and the levels of usage
17 lower-income customers are likely to have.⁷

² PAWC St. 9-R at 8:5-6.

³ *Id.* at 9:4-8.

⁴ CAUSE-PA St. 1 at 28:18 - 29:1; merely 13% of estimated low income customer and 30% of confirmed low income customers are enrolled in the Company’s Bill Discount Program (BDP).

⁵ *Id.* at 9:12-16.

⁶ *Id.* at 10-11: 19-4.

⁷ *Id.* at 12: 17-19.

1 **Q: What is your response to Ms. Ather's rebuttal testimony related to your analysis of**
2 **the Company's affordability analyses?**

3 A: I stand firmly by the analysis and statements in my direct testimony. Fundamentally,
4 the Company's affordability analysis and the conclusions drawn therefrom are not grounded in the
5 reality of low income customers' actual bills or the fact that 70% of customers *known* to be eligible
6 for PAWC's BDP are not enrolled in the program. The Company's conclusion that service is
7 generally affordable relies on the fallacy that all BDP-eligible customers in need of assistance are
8 already enrolled in the BDP,⁸ and posits that those who are not enrolled, are not enrolled because
9 they have intentionally opted not to be.⁹ However, the vast majority of eligible low income
10 households are not enrolled in the BDP despite overwhelming evidence of need.¹⁰ Based on Ms.
11 Ather's exhibits DFA-1 and DFA-2, a household of four with usage roughly at PAWC's BWS who
12 is not enrolled in the BDP would have a monthly water/wastewater bill of nearly \$300.¹¹ It strains
13 credulity that a low income household receiving a bill this size would be aware of an available
14 discount program and simply opt not to apply for assistance. The vast majority of low income
15 customers not enrolled in the BDP are not making a conscious, informed choice to forgo rate
16 assistance and arrearage management when faced with disproportionately high debt and
17 termination rates. Even for those who are enrolled, rates remain categorically unaffordable: a
18 \$217.22 water/wastewater bill for a family of four making just over \$49,500 per year, is not
19 affordable.¹²

⁸ PAWC St. 9 at 19: Tables 5,6.

⁹ PAWC St. 9-R at 9:12-16.

¹⁰ CAUSE-PA St. 1 at 28-29: 18-1.

¹¹ See PAWC St. 9; Exhibit DFA-1, DFA-2; proposed base water bill for 4,800 gallons of usage is \$130.73, proposed base wastewater bill for 4,800 gallons of usage is \$156.29, for a total combined bill of \$278.02.

¹² CAUSE-PA St. 1 at 38: Table 13; citing PAWC responses to CAUSE PA 1-26, 1-27, attached to CAUSE-PA St. 1 at Appendix B; the burden for a family of 4 at just above 150% FPL with usage at 41.6 gallons per person per day, approximately PAWC's definition of BWS, is 5.3%.

1 While Ms. Ather contends that my analysis lacks context regarding the connection between
2 household size and typical usage, in my direct testimony I cited specifically to households with
3 typical usage for the household size under both PAWC’s BWS and the EPA-utilized usage levels,
4 noting the household burden at these usage levels exceeds the 4% affordability standard PAWC is
5 basing its conclusions on.¹³

6 CAUSE-PA Exhibit 1 provides a simple, straightforward table of bill impacts for families
7 of various sizes, with various household income, and with various usage levels – rooted in the fact
8 that low income families in PAWC’s wide geographic footprint are not a monolith and cannot be
9 generalized as having average or median residential customer characteristics – they are different
10 sizes, have different income levels, and have different water needs that depend on a range of
11 factors. In reviewing PAWC’s response to discovery, it is clear that there exists an extremely wide
12 range of usages among the company’s low income customers.¹⁴

13 Furthermore, Ms. Ather’s own analysis in DFA-1 and DFA-2 shows a range of customers
14 with a range of income levels. By way of example, DFA-1 shows that PAWC has 14,044 water
15 customers with income below \$5,000 per year. Combined with a range of usage levels that PAWC
16 provided in discovery for its customers provides all the context that is needed for my analysis to
17 demonstrate that PAWC’s bills are unaffordable. Utility affordability cannot be accomplished by
18 mere fiat. Simply declaring that PAWC’s bills are “generally affordable” does not address the

¹³ EPA Water Affordability Needs Assessment: Report to Congress (December 2024). Available at: <https://www.epa.gov/system/files/documents/2024-12/water-affordability-needs-assessment.pdf> (Last visited: 01/30/2026) (“2024 EPA Report”) at Appendix D: Water Hygienic Use Values used in National Affordability Studies; the majority of studies cited use 50 gallons per day, assuming a household of 4, resulting in 6,200 gallon usage per household per month; As stated in CAUSE-PA St. 1 at 40; a family of four at 150% FPL using 50 gallons per person/day, or approximately 6,000 gallons/month, will be burdened with combined water/wastewater burdens of 4.42% at proposed rates and discount levels, even if enrolled in the Company’s BDP.

¹⁴ See PAWC Response to CAUSE-PA 2-14, Revised Confidential Attachment. While I have elected not to attach this document to my testimony because of its confidential nature, it shows a wide range of annual usages of its BDP participant households.

1 specific and acute affordability challenges faced by PAWC’s low income customers, which are not
2 mitigated by the mere existence of a bill discount program.

3 Furthermore, Ms. Ather’s contention that PAWC’s BDP enrollment is based on “individual
4 customer’s enrollment decisions”¹⁵ rings hollow in light of the Company’s fundamental
5 unwillingness to increase routine screening or create other avenues to meaningfully make
6 customers aware that they may be eligible for the BDP. In my four decades of experience and
7 involvement creating, implementing and evaluating programs intended to serve low income
8 Pennsylvanians facing utility insecurity, I have found that it is not enough to create a program and
9 declare “mission accomplished” – utilities must assume ownership and responsibility, build trust
10 with vulnerable customer groups, expand education, and create clear and streamlined processes
11 and procedures that ensure eligible households are informed of the benefits of and assisted with
12 enrollment.

13 Regarding Ms. Ather’s attempt to redefine affordability as whether customers above 200%
14 FPL can afford to subsidize customers at or below 200% FPL without themselves being priced out
15 of water service, it is unclear from where this definition of affordability is derived. The Company
16 did not cite any studies or additional analyses to support its definition. Further, the point appears
17 to be added gratuitously since Ms. Ather herself acknowledges that neither PAWC nor its
18 customers are at such a point.¹⁶

19 To claim that “the Company’s proposed rate design in this proceeding results in water and
20 wastewater service that is generally affordable for our customers,”¹⁷ is to attempt to obfuscate the
21 reality of the Company’s actual billing amounts by relying on statements of general affordability

¹⁵ PAWC St. 9-R at 9:12-16.

¹⁶ Id. at 10:4.

¹⁷ Id. at 8:12-13.

1 vaguely defined. As detailed in my direct testimony, there is a distinct difference between the
2 ability of low income families within PAWC service territory and its general customer base to
3 afford PAWC services. It is my contention based on the record evidence that far too many of
4 PAWC's low income customers cannot afford service at existing rates without assistance; and far
5 too many of PAWC's low income customers are not receiving the assistance for which they are
6 eligible. This widespread unaffordability, and the inaccessibility of PAWC's programs, must be
7 addressed. To be just and reasonable, rates must be set at a level that ensures service is universally
8 accessible to all customers, including its low income customers. This is a basic premise of the
9 regulatory compact that is ignored by PAWC's spurious affordability analysis. Thus, as I stated in
10 my direct testimony, PAWC's affordability analysis lacks support, provides little value, and is
11 untethered to the experience of its residential customers.

12 **III. RESPONSES TO PAWC'S REBUTTAL TESTIMONY REGARDING ITS**
13 **PROPOSED RATE DESIGN.**

14 **Q: Please summarize PAWC witness McClellan's rebuttal testimony related to your**
15 **recommendations regarding proposed increases to its water and wastewater fixed charges.**

16 A: Mr. McClellan disagrees with my assertion that increasing the fixed customer charge
17 undermines customers' ability to manage their bills through conservation.¹⁸ He states that the
18 proposed customer charges are designed to recover fixed costs, including metering, billing,
19 customer service, and system readiness.¹⁹ While noting that volumetric charges signal usage and
20 conservation incentives, he concludes that conservation alone cannot reasonably be expected to
21 eliminate the fixed costs required to maintain continuous access to safe and reliable service.²⁰

¹⁸ PAWC St. 10-R at 24: 10-12.

¹⁹ *Id.* at 24: 12-14.

²⁰ *Id.* at 24: 16-18.

1 **Q: What is your response to Mr. McClellan’s assertions?**

2 A: A low income customer who receives a bill is not calculating what portion of their bill is
3 fixed and what portion is volumetric. They are responsible for their entire bill. For these individual
4 households, the ability to conserve to reduce bills is an important affordability tool. Customers
5 will still be paying for the overall costs of the distribution system even if more of those costs are
6 shifted to volumetric rates under my proposal as compared to PAWC’s proposal to increase the
7 unavoidable, fixed portion of a customer’s bill. Thus, I maintain my position that PAWC should
8 not increase its water or wastewater fixed charges.

9 **Q: Please summarize Mr. McClellan’s response to your testimony regarding the**
10 **Company’s proposed deduct adjustment.**

11 A: Mr. McClellan notes that I am opposed to PAWC’s proposed deduct adjustment and
12 references my concerns that the deduct adjustment improperly shifts the revenue burden from
13 higher income customers who reside in single-family homes and have the luxury of discretionary
14 water use to customers with lower income, and those that live in smaller homes.²¹ He argues that
15 if concerns regarding the deduct adjustment proposal are for the purpose of benefitting lower
16 income customers with lower usage, that concern is better addressed through targeted affordability
17 mechanisms, referencing Dr. Chard’s testimony.²² Mr. McClellan points to the Company’s
18 “robust BDP” as a program specifically designed to provide income-based assistance to eligible
19 customers.²³

20 **Q: What is your response to Mr. McClellan’s response to your testimony regarding the**
21 **Company’s proposed deduct adjustment?**

²¹ Id. at 32: 1-8.

²² Id. at 33:18-22.

²³ Id. at 34: 1-3.

1 A: First, I agree with Mr. McClellan that the best way to address the pervasive effects of
2 unaffordable wastewater service is for customers to enroll in a robust, targeted BDP. However,
3 PAWC programming has not achieved that status. This is why I made suggestions that PAWC
4 improve enrollment and enhance the program to improve affordability. Further, until a household
5 enrolls, they will be required to subsidize the wastewater revenue requirement through higher rates
6 because of PAWC's deduct metering proposal. As noted in my direct, there is an enormous gulf
7 between the more than 152,000 estimated low income customers (and even the 65,000 confirmed
8 low income customers)²⁴ in PAWC's service territory and PAWC's BDP enrollment levels of
9 15,358 (water), 1,256 (wastewater), and 3,352 (combined services).²⁵ The fact that the vast and
10 overwhelming majority of low income customers are not enrolled in the BDP indicates the lack
11 of program "robustness" and does nothing to insulate low income customers from the effects that
12 I noted about having to pay higher rates because of PAWC's deduct meter proposal.

13 To the contrary, it would only further compound cost shifting, as it would increase the cost
14 of BDP that is paid for by the 70% of low income households not enrolled in BDP. Rates for low
15 income residential customers should not increase to subsidize higher water usage by households
16 with greater means. For these reasons, and the reasons outlined in my direct testimony, I continue
17 to oppose PAWC's deduct adjustment proposal.

18 **Q: Please summarize Dr. Chard's response to your recommendations regarding the**
19 **Company's proposed CAP Rider.**

20 A: Dr. Chard initially states that the Company's proposed CAP Rider is based upon the Public
21 Utility Code's provisions for alternative ratemaking under 66 Pa. C.S. § 1330, distinguishing the
22 Company's proposal in this case from previous proposals for water and wastewater universal

²⁴ CAUSE-PA St. 1 at 8-9.

²⁵ Id. at 24, PAWC Response to CAUSE-PA 01-014, Attachment, attached to CAUSE-PA St. 1 at Appendix B.

1 service riders.²⁶ She then states that neither myself nor Mr. Colton addressed factors under §
2 1330.²⁷ Dr. Chard also reiterates that the Company is proposing its CAP Rider because it
3 anticipates significant CAP participation fluctuation due to the redesign of the Company’s
4 programs in accordance with Commission rulings and guidance.²⁸ She then takes issue with my
5 description of PAWC’s low income programming as nascent and in development,²⁹ and maintains
6 that PAWC’s programs have been fully implemented and are accompanied by increased outreach
7 to low-income customers.³⁰

8 **Q: What is your response to Dr. Chard’s assertions?**

9 A: First, Dr. Chard is correct that I did not expressly address the Section 1330 factors, but that
10 is not dispositive to the issue of whether a rider is necessary. As outlined in my direct testimony,
11 given the relatively low percentage of eligible customers who are currently enrolled, the nascent
12 nature of this recently overhauled program, and the fact that no other water or wastewater providers
13 in Pennsylvania have rider recovery mechanisms, I see no reason why PAWC should seek to
14 guarantee recovery of its costs through a rider.

15 Further, by seeking a rider the Company is attempting to gain the benefit of a fully
16 developed universal services portfolio while rejecting the obligations of implementing each of its
17 components, undertaking efforts at robust enrollment, or submitting to public reporting and
18 evaluation accountability. For example, it has rejected my recommendation to implement either a
19 leak repair program, which, as discussed below, PAWC witness Prine framed as “attempting to
20 impose a low-income usage reduction program (“LIURP”) construct on PAWC that was

²⁶ PAWC St. 2-R at 14:17-19.

²⁷ *Id.* at 15: 1-2.

²⁸ *Id.* at 15: 3-5.

²⁹ *Id.* at 14:11-12.

³⁰ *Id.* at 15: 5-7.

1 established for electric distribution companies (“EDCs”) and natural gas distribution companies
2 (“NGDCs”).”³¹ As PAWC witness Mr. Prine correctly points out, EDCs and NGDCs implement
3 LIURP programming as part of broader universal service plans, which the Company has rejected
4 my recommendation to implement.³² A usage reduction program and a comprehensive universal
5 service plan which is subject to periodic due process review and enhanced Commission oversight,
6 *inter alia*, are components of low income programming that EDCs and NGDCs must maintain,
7 and in return, they are permitted guaranteed recovery of universal service program costs through
8 a non-bypassable rider.

9 It appears to me that the Company is prematurely attempting to avail itself of the benefits
10 of guaranteed cost recovery through a rider enshrined in the Choice Act without establishing each
11 component of universal service, actively acting to have those components fully enrolled and
12 affordable, and without taking on the responsibilities incumbent upon Companies who are actually
13 covered by the Act.

14 **IV. RESPONSE TO PAWC REBUTTAL TESTIMONY REGARDING**
15 **RECOMMENDED ENHANCEMENTS TO PAWC’S LOW INCOME**
16 **PROGRAMMING.**

17 **Q: Please summarize the rebuttal testimony of PAWC witnesses Chard and McClellan**
18 **regarding your recommended improvements to PAWC’s Bill Discount Program.**

19 A: Dr. Chard first echoes Ms. Ather’s claim PAWC’s rates are affordable for most customers,
20 including low-income customers enrolled in the BDP – using sweeping generalizations and class
21 averages to sidestep clear evidence from my direct testimony that larger households and those with

³¹ PAWC St. 15-R at 25:1-3.

³² *Id.* at 3-4.

1 the least resources face categorically unaffordable rates, even when enrolled in the BDP.³³ She
2 then states that the Company does not believe it is reasonable to incur the costs associated with
3 upgrading its IT systems and overhauling its BDP to adopt a Percentage of Income Payment Plan
4 (PIPP) when its current BDP structure offers four tiers of discounts tailored to customers based on
5 their household income levels.³⁴

6 Mr. McClellan is opposed to the BDP discount levels I proposed as an interim step towards
7 a PIPP, which included a recommendation to provide a full discount on fixed charges for BDP
8 participants and a tiered discount on volumetric charges.³⁵ He takes issue with my proposal to
9 fully discount the fixed charge for BDP participants and argues that, from a rate design perspective,
10 fixed charges are intended to recover costs that are incurred to serve all customers regardless of
11 usage, and states that the Company believes it is appropriate for every customer, including BDP
12 participants, to contribute toward those costs in some amount.³⁶

13 **Q: What is your response to Dr. Chard and Mr. McClellan's critiques of your**
14 **recommendations to enhance PAWC's BDP?**

15 A: In my direct testimony in this proceeding, as well as my direct testimony in PAWC's 2023
16 rate case, I indicated that a PIPP is the optimal way to structure a BDP to achieve consistent,
17 equitable, and targeted levels of affordability for low income households.³⁷ In its previous rate
18 case, PAWC stated that the Company was unable to implement a PIPP at that time because PAWC
19 did not have a verification of income process in place.³⁸ The Company also noted at that time that

³³ PAWC St. 2-R at 5: 14-16.

³⁴ *Id.* at 5:18-19 – 6:1-4.

³⁵ PAWC St. 10-R at 6:10; CAUSE-PA St. 1 at 40, T. 14.

³⁶ *Id.* at 6:14-15 – 7:1-2.

³⁷ CAUSE-PA St. 1 at 39:8-20; Pa. PUC v. PAWC, Docket Nos. R-2023-3043189, et al, (2023 PAWC Rate Case), CAUSE-PA St. 1 at 44-46. (Direct Testimony dated February 1, 2024).

³⁸ 2023 PAWC Rate Case, PAWC St. 14-R at 5.

1 its Arrearage Management Program (AMP) would be implemented by the end of the year,³⁹ and
2 that the Company would begin requiring income verification for AMP and BDP.⁴⁰

3 Now that those conditions have been satisfied, it seems the Company is simply reluctant to
4 invest in the necessary IT upgrades to institute a PIPP to provide a more precise level of
5 affordability for participating households. While I recognize that PAWC's tiered discounts provide
6 more targeted bill assistance than a flat discount across all low income customers, they do not
7 target affordability as closely or clearly as a maximum bill based on a percentage of income. Thus,
8 I maintain that a PIPP rate structure is more equitable than a tiered discount program and
9 transitioning PAWC's BDP to a PIPP would ensure that those at the lowest levels of the Federal
10 Poverty Level (FPL) and/or with larger families are not paying a disproportionate level of their
11 income for critical water and wastewater services. As discussed in my direct testimony, rates for
12 water and wastewater services have risen steeply over the past several years,⁴¹ and are already
13 unaffordable for PAWC's low income customers.⁴² It is important that PAWC have a program
14 structure in place capable of delivering accessible, consistent, and equitable levels of affordability
15 to economically vulnerable households.

16 Regarding Mr. McClellan's opposition to my interim bill discount charges, his objections
17 stem mostly from the belief that all customers should have to pay a portion of the fixed customer
18 charge.⁴³ I disagree with Mr. McClellan. The purpose of designing a bill discount program is to
19 ensure that income eligible customers receive targeted rate affordability. This is fundamentally
20 different than the goal of designing rates to recover a revenue requirement. Based on the

³⁹ *Id.* at 5: 2-4.

⁴⁰ *Id.* at 10: 1-3.

⁴¹ CAUSE-PA St. 1 at 35; Table 10.

⁴² *See* CAUSE-PA St. 1 at 24-25.

⁴³ PAWC St. 10-R at 6-7.

1 information in my direct testimony, I continue to submit that PAWC’s current and proposed
2 discount program does not achieve the same levels of affordability as my recommendations would
3 achieve and stand by the positions outlined in my direct testimony.

4 **Q: Please summarize Dr. Chard’s response to your recommendations regarding**
5 **PAWC’s Arrearage Management Program (AMP).**

6 A: Regarding my programmatic recommendations, Dr. Chard states that it is important that
7 customers participating in the AMP make timely payments to receive credits and that the
8 Company’s AMP is intentionally structured to encourage timely payment behavior.⁴⁴ She also
9 states that the current \$25 per month forgiveness credit is reasonable. While acknowledging that
10 it may take longer for some AMP participants to achieve full forgiveness, she states that the
11 Company believes this is a fair outcome, treating each AMP participant equally.⁴⁵

12 In addressing my concerns regarding under-enrollment in the AMP, Dr. Chard maintains
13 that customers who enroll in the BDP are “automatically” enrolled in the AMP, assuming they
14 have a balance of at least \$150 that is at least 60 days old, and clarifies that there is no separate
15 application required.⁴⁶ She then states that for customers who are already enrolled in the BDP but
16 are otherwise qualified for the AMP, the Company offers a streamlined AMP enrollment process
17 that does not require any further income verification.⁴⁷ She does recognize that a mere 3,739 of
18 the 19,966 customers enrolled in the BDP were also enrolled in the AMP as of November 2025,
19 but concludes that this level does not indicate that the AMP is unsuccessful, noting that the AMP
20 is a nascent program, having only launched in late 2024.⁴⁸ She then concludes that my

⁴⁴ PAWC St. 2-R at 7: 10-14.

⁴⁵ Id. at 7: 15-18.

⁴⁶ Id. at 9:4-7.

⁴⁷ Id. at 9:11-13.

⁴⁸ Id. at 9: 19-20.

1 recommendations to successfully implement the AMP are not necessary and should be rejected.⁴⁹

2 **Q: What is your response to Dr. Chard’s rejection of your programmatic**
3 **recommendations regarding the AMP?**

4 A: Without reiterating my extensive explanations regarding the lived reality of low income
5 households,⁵⁰ I maintain that a timeliness requirement does not encourage timely payment by those
6 households who simply do not have the resources to pay. When incomes fluctuate and unexpected
7 expenses arise, low income households, who do not have budgeting elasticity, may not be able to
8 make timely payments. In those situations, which are commonplace for households living near or
9 below the poverty line, the timely payment requirement functions merely to reduce the forgiveness
10 they are able to access - not to incent payment behavior.

11 Regarding the Company’s assertion that a \$25 monthly forgiveness credit is sufficient, Dr.
12 Chard points to the Company’s hardship fund as a mitigating factor, stating that despite the longer
13 forgiveness timeframe, other PAWC program rules are more beneficial to AMP customers.⁵¹ As
14 all jurisdictional water, wastewater, gas and electric companies currently run hardship funds, it is
15 not clear what she means by “more beneficial.” All EDCs and NGDCs offer forgiveness over a
16 set period of time, most do not have a timely payment requirement⁵²—recognizing the lived realities
17 of their low income customers, and both Aqua PA and Pittsburgh Water provide \$40 per month
18 forgiveness credits.⁵³ My point is not that the Company must do something simply because
19 another utility company is or is not doing it, but that there are a range of program details among
20 Pennsylvania’s regulated utilities. My recommendations in this case, including my

⁴⁹ *Id.* at 9: 14-15.

⁵⁰ CAUSE-PA St. 1 at 46:3-20.

⁵¹ PAWC St. 2-R at 8:2-3.

⁵² *See, e.g.*, Columbia Gas 2024-2028 USEPC at 35; Duquesne Light 2020-2025 USECP at 9-10; First Energy 2024-2028 USECP at 15; UGI 2020-2025 USECP at 26.

⁵³ <https://www.aquawater.com/customers/customer-assistance-programs/customer-assistance-program-cap>;
<https://www.pgh2o.com/residential-commercial-customers/customer-assistance-programs>;

1 recommendations regarding the Company's AMP, are based on the evidence presented in
2 testimony and discovery as to the actual incomes, bills, and arrearage levels of PAWC's low
3 income customers, as detailed extensively in my direct testimony.⁵⁴ Increasing the level of
4 forgiveness each month ensures that households with higher balances have a meaningful
5 opportunity to reduce their arrearages within a reasonable timeframe.

6 **Q: What is your response to Dr. Chard's assertions that the AMP does not require any**
7 **further enhancement or coordination with the BDP?**

8 A: It is difficult to see the BDP/AMP coordination as a success when even Dr. Chard
9 recognizes that merely 3,739 of the 19,966 customers enrolled in the BDP were also enrolled in
10 the AMP as of November 2025.⁵⁵ To the contrary, I maintain that having less than 20% of BDP
11 enrollees also enrolled in the AMP is, in fact, an indication that the AMP/BDP coordination is
12 unsuccessful. In addition, as of November 2025, 18,539 BDP enrollees were carrying a balance,⁵⁶
13 nearly 11,000 of those have a balance that is at least 61 days old,⁵⁷ and PAWC has issued over
14 20,000 payment arrangements to BDP participants since the AMP was implemented.⁵⁸ Quite
15 simply, it is undeniable that not all customers who are eligible for the AMP are enrolled, and
16 further policies and procedures are necessary to ensure all eligible BDP participants are enrolled.

17 Regardless of PAWC's process for enrolling *new* BDP enrollees into the AMP, it is clear
18 that there are *currently* many BDP participants who would benefit from AMP enrollment but are
19 not enrolled. Therefore, I maintain my recommendation, consistent with my direct testimony, that
20 all BDP participants that have qualifying arrears and are not enrolled in the AMP should be

⁵⁴ See CAUSE-PA St. 1 at 44-48.

⁵⁵ PAWC St. 2-R at 9:19-20.

⁵⁶ OCA to PAWC 4-16, attachment.

⁵⁷ *Id.*

⁵⁸ CAUSE-PA St. 1 at 43: citing PAWC Response to CAUSE-PA 01-041, Attachment, attached to CAUSE-PA St. 1 at Appendix B.

1 enrolled within 90 days of the effective date of rates – without requiring further affirmative action
2 by the qualifying customer.⁵⁹ PAWC should work with its Customer Assistance Advisory Group
3 (CAAG) to develop outreach and education to these customers to explain that their arrears will be
4 forgiven with each in full BDP payment moving forward and that they do not have to enter a
5 payment arrangement to receive this forgiveness.⁶⁰

6 **Q: Please summarize Dr. Chard’s response to your recommendations regarding the**
7 **Company’s hardship fund.**

8 A: Dr. Chard confirmed that PAWC has already adopted the functionality to allow customers
9 to apply for multiple hardship fund grants in the same program year.⁶¹ She then stated that my
10 recommendation to increase the grant amounts to \$750 for water and wastewater, respectively, is
11 not necessary and that PAWC is not aware of any other Pennsylvania utility offering hardship
12 grants of up to \$1,500 per customer.⁶² She also indicates that increasing the annual caps could
13 strain program resources.⁶³

14 **Q: What is your response to Dr. Chard’s rebuttal testimony regarding PAWC’s**
15 **hardship fund?**

16 A: As stated in my direct testimony, a residential customer with average usage will see a
17 combined bill of nearly \$215 each month if PAWC’s proposed rates are approved.⁶⁴ Confirmed
18 low income customers, as defined by PAWC as those with income at or below 250% FPL,⁶⁵ have
19 significantly higher usage and will therefore see significantly higher bills.⁶⁶ It is appropriate that

⁵⁹ *Id.* at 44.

⁶⁰ *Id.*

⁶¹ PAWC St. 2-R at 10: 11-12.

⁶² *Id.* at 10:15-17.

⁶³ *Id.* at 10:17-19.

⁶⁴ CAUSE-PA St. 1 at 5:7-14.

⁶⁵ *Id.* at 9: 4-7.

⁶⁶ *Id.* at 33; Tables 7-9.

1 PAWC’s hardship fund account for the actual bill amounts and arrearage levels of its own
2 customers, whose combined water and wastewater rates are already the highest in the
3 Commonwealth and will be even higher after this proposed rate increase.⁶⁷

4 It is certainly true that increasing PAWC’s hardship fund limit may result in increased
5 spending, especially if PAWC’s staggering proposed rate increase is approved. However, PAWC
6 has control over its hardship funding levels and I would certainly support an increase in
7 shareholder contributions to these programs if PAWC believes that its budget is strained. I note
8 that the Company’s hardship funds were last depleted in September 2024.⁶⁸ As of December 2025,
9 the fund’s balance was \$1,250,312.⁶⁹ Thus, I stand by my recommendation set forth more fully in
10 my direct testimony that PAWC be required to increase its maximum grant amounts to \$750 for its
11 water and wastewater customers, respectively.

12 **Q: Please summarize Dr. Chard’s response to your recommendation regarding the**
13 **Company’s proposed Renter Assistance Pilot Program (RAPP).**

14 A: I stated in my direct that, in my view, the Company’s proposed RAPP would directly
15 benefit both commercial customers (owners/landlords of multifamily buildings) and non-
16 ratepayers (tenants in those buildings).⁷⁰ Dr. Chard counters my assertion by stating that the
17 program is solely intended to benefit low income tenants.⁷¹ She then explains, as she did in the

⁶⁷ Based on base rates at 3,000 gallons usage; see Pittsburgh Water and Sewer Authority Supplements No. 18 Tariff Water – Pa. P.U.C. No. 1 Fourth Revised Page Nos, 8, 8A, No. 17 Tariff Wastewater – Pa. P.U.C. No.1 Fourth Revised Page Nos. 9, 9A, No. 9 Tariff Storm Water – Pa. P.U.C. No. 1 Second Revised Page No. 7; Aqua Pennsylvania, Inc. Tariff Water – Pa. P.U.C. No. 4 Original Page 12.1, Tariff Wastewater – Pa. PU.C. No. 4 Original Page 11.1.1.; Veolia Water Pennsylvania, Inc. Supplements No. 71 to: Water – Pa P.U.C. No. 7 Thirteenth Revised Page 6, No. 8 to Tariff Wastewater – Pa. P.U.C. No. 2 Second Revised Page No. 7A.

⁶⁸ PAWC Response to CAUSE-PA 01-019, attached hereto at Appendix A.

⁶⁹ PAWC Customer Assistance Advisory Group Presentation at 2.; presented December 15, 2025; attached hereto at Appendix A.

⁷⁰ CAUSE-PA St. 1 at 63.

⁷¹ PAWC St. 2-R at 11:17.

1 Company's initial filing, that participants will be income verified, payments will be sent directly
2 to participants, and that the Company will have in place additional safeguards around
3 recertification.⁷² Finally, while rejecting all of my other recommendations to improve PAWC's
4 existing programs to support its low income customers directly, Dr. Chard asserts that the
5 Company is looking for innovative ways to address unaffordability.⁷³

6 **Q: What is your response to Dr. Chard's continued support of the Company's proposed**
7 **RAPP, and your recommendations related thereto?**

8 A: First, I want to commend the Company for looking for innovative ways to address the
9 economic challenges faced by low income households. As demonstrated throughout my direct
10 testimony, low income households struggle to make ends meet and often must make difficult
11 choices between paying rent, utility bills, purchasing food and medicine, and managing unexpected
12 expenses that inevitably arise. However, the Company has requested a rate increase of nearly \$170
13 million, its fourth in five years, yet its low income programming is under-subscribed and does not
14 produce consistent levels of affordability for its low income customers. The Company is also
15 opposed to recommendations I have made to improve both its enrollment numbers and
16 affordability, including my recommendation to implement a comprehensive low income leak
17 repair program, stating broadly that my recommendations are not necessary.

18 I maintain that until PAWC's existing programs that are intended to support its low income
19 *customers* are improved in both reach and effect, any additional resources the Company wishes to
20 utilize to address economic challenges should be focused on –its low income customers, not non-
21 customer tenants in its service territory.

⁷² Id. at 11: 17-20.

⁷³ Id. at 12:1.

1 **V. RESPONSE TO PAWC WITNESS PRINE’S (PAWC ST. 15-R) REBUTTAL**
2 **TESTIMONY.**

3 **Q: Please summarize PAWC witness Prine’s rebuttal testimony related to your proposed**
4 **low income leak repair program.**

5 A: In response to my recommendation regarding implementation of a low income leak repair
6 program, Mr. Prine states that it is not required nor feasible for PAWC to develop and implement
7 a comprehensive conservation and line repair/replacement program, as the Company has not
8 included the costs in this case to hire additional staff to support a LIURP-type program or
9 projections for repairing and replacing the leaking lines and infrastructure of low income
10 customers.⁷⁴ He recognizes that other water utilities have line repair/conservation programs or
11 pilots, but notes that such programs were created through voluntary settlements and were not
12 imposed unilaterally by the Commission.⁷⁵

13 **Q: What is your response to Mr. Prine’s rebuttal testimony related to your proposed low**
14 **income leak repair program?**

15 A: I maintain my concern that the lack of a comprehensive conservation and leak repair
16 program for low income customers leaves a gap in assistance for households who cannot afford to
17 make repairs or tenants with landlords who refuse to do so. This gap in assistance to address leaks
18 and improve conservation unnecessarily drives up the cost of bill assistance and arrearage
19 management through the BDP and AMP and unnecessarily expends limited grant assistance
20 available through the hardship fund.

⁷⁴ PAWC St. 15-R at 25: 1-12.

⁷⁵ *Id.* at 25: 1-12.

1 Regarding Mr. Prine’s conclusions about staffing needs to support a LIURP style program,
2 I think it would be prudent to compare any projected staffing costs to the substantial volume of
3 water lost to leaks and line breaks in low income households. These losses contribute to
4 unaffordable bills, unpaid charges, uncollectible expenses and loss of service. While Mr. Prine is
5 correct that other water utilities implemented leak repair and conservation programs voluntarily or
6 through settlements, each program was reviewed and approved by the Commission. Nothing in his
7 rebuttal testimony indicates that the Commission would oppose the creation of such a program for
8 PAWC customers. In fact, noting that other programs were approved by the Commission
9 demonstrates their feasibility and effectiveness, not a reason to dismiss them.

10 Moreover, PAWC is unable to demonstrate measurable outcomes from its current
11 conservation kit initiative. The Company cannot verify whether a single kit has been installed or
12 whether any installation has led to reduced usage, cost savings, or avoidance of termination.⁷⁶
13 There is also no evidence that the households receiving PAWC’s kits did not otherwise receive the
14 same measures from their electric or gas provider through energy efficiency programs. For
15 households facing unaffordable bills driven by leaks, a kit is not a substitute for necessary repairs.
16 A properly structured water conservation program produces measurable, trackable benefits,
17 including reduced usage, lower arrearages, and improved payment stability.

18 As noted above, Mr. Prine framed this recommendation as “attempting to impose a
19 [LIURP] construct on PAWC that was established for [EDCs and NGDCs].”⁷⁷ To be clear, I
20 recommended that the Company develop this program because of its benefits to participants and
21 other ratepayers – helping reduce the cost of providing bill assistance and arrearage management

⁷⁶ PAWC Response to CAUSE-PA 01-020, Attachment, attached to CAUSE-PA St. 1 at Appendix B.

⁷⁷ PAWC St. 15-R at 25:1-3.

1 benefits. I take the Company at its word that it is looking for innovative ways to address
2 affordability, as stated by Dr. Chard;⁷⁸ however, my contention is that there are many proven ways
3 to address affordability, and before the Company attempts to charter new ground through RAPP
4 or any other novel approach, it should consider existing programs, both its own and those of other
5 utility companies, that are designed to benefit its low income ratepayers and address unnecessarily
6 high usage. Thus, I continue to support my recommendation that the Company develop leak repair
7 and conservation programs.

8 **Q: Please summarize the rebuttal testimony of Mr. Prine (PAWC St. 15-R), related to**
9 **your analysis of the Company's customer screening and enrollment practices.**

10 A: In response to my recommendation that the Company avoid entering into a deferred
11 payment arrangement unless the customer expressly declines to enroll in BDP or AMP or to apply
12 for a Hardship Grant, Mr. Prine states that PAWC already trains Customer Care Agents (CCAs)
13 to ask for income information and advise the customer about assistance programs available to them
14 when a customer expresses trouble paying their bills and wishes to set up a payment plan.⁷⁹

15 Mr. Prine disagrees with my recommendation that PAWC perform income screening for
16 new and moving customers and during non-emergency calls from existing customers because he
17 believes customers may not want to share their income information when calling about non-billing
18 topics and points to the *myWater* link to information for customers who log on as sufficient.⁸⁰ Mr.
19 Prine notes elsewhere in his testimony that less than 63% of PAWC customers complete
20 transactions with the Company online.⁸¹

⁷⁸ PAWC St. 2-R at 12:1.

⁷⁹ PAWC St. 15-R at 23: 12-16.

⁸⁰ *Id.* at 23-24: 16-21; 1-3.

⁸¹ *Id.* at 7:19-20.

1 **Q: What is your response to Mr. Prine’s rebuttal testimony?**

2 A: First, I note that the Commission has recently endorsed the screening mechanisms that I
3 recommend here in its Final Order in Columbia Gas’s most recent rate case.⁸² The Company’s
4 current approach to measuring the effectiveness of call handling performance and enrollment
5 procedures is not sufficient because it depends entirely on customers reaching out on their own
6 and stating their inability to pay. Instead, I recommended that the Company adopt a proactive
7 strategy that actively connects with hard-to-reach communities and measures how effectively
8 CCAs enroll eligible customers into low income programs.⁸³

9 It is not sufficient for the Company to depend on customers logging into myWater to see
10 information about PAWC’s low income programming, as, according to Mr. Prine, over 37%, or
11 nearly 250,000 customers, are **not** completing transactions online.⁸⁴ Overall, I maintain my
12 position that the Company’s CSA screening protocols can be improved to promote enrollment in
13 PAWC’s H2O program and other low income programs, especially to those who do not have online
14 access or proficiency in navigating online portals.

15 **VI. RESPONSE TO PAWC WITNESSES CHARD AND PRINE REGARDING MY**
16 **RECOMMENDATIONS TO FILE A COMPREHENSIVE UNIVERSAL**
17 **SERVICE PLAN.**

18 **Q: Please summarize Dr. Chard’s rebuttal testimony regarding your recommendation**
19 **that PAWC be required to adopt a universal service plan in its next base rate case to which**
20 **you wish to respond.**

⁸² Pennsylvania Public Utility Commission v. Columbia Gas of Pa., Docket No. R-2025-305349, Order at 350-351 (issued December 4, 2025); stating “As of December 2024, only 20,988 Columbia customers were enrolled in CAP, accounting for only 23% of the Company’s estimated low income customers and 30% of its CLI customers. Such statistics highlight that additional CAP screening is appropriate.” (Internal citations omitted).

⁸³ PAWC St. 15-R at 11:13-18 – 12:1-15.

⁸⁴ Id. at 7: 19-20; PAWC Response to CAUSE-PA 01-002, Attachment, attached to CAUSE-PA St. 1 at Appendix B.

1 A: Dr. Chard argues that the Commission should reject my recommendation that PAWC
2 develop and file a comprehensive universal service plan because there is no statutory or regulatory
3 requirement that water utilities file such a plan, citing the Order from its 2023 rate case.⁸⁵ Mr. Prine
4 echoes this sentiment, stating that unlike EDCs and NGDCs, PAWC is not explicitly required to
5 develop and file a universal service plan.⁸⁶

6 **Q: What is your response to the Company’s rebuttal testimony?**

7 A: As acknowledged in my direct testimony, PAWC is not explicitly required in regulation or
8 statute to develop and file a unified plan related to its low income assistance programs.⁸⁷
9 Realistically, however, this leaves substantial gaps for the Commission, consumers, and consumer
10 advocates who must rely on a patchwork of tariffs, settlements, orders, discovery requests, and
11 information pieced together from websites and outreach materials to determine the full scope of
12 rules, polices, and procedures related to these programs.⁸⁸

13 As noted repeatedly in my testimony, PAWC is proposing to develop new low income
14 programming (RAPP) and alternative ratemaking mechanisms (CAP Rider, deduct adjustment)
15 that are **not** specifically required for water and wastewater utilities, and insists that the Company
16 is looking for innovative ways to address utility affordability. Yet it resists developing a unified
17 plan that outlines the parameters of each program to promote transparency and improve oversight
18 of its programs. My recommendation for a universal service plan, including a consumer education
19 and outreach plan, is an essential tool in ensuring that existing programs are appropriately

⁸⁵ PAWC St. 2-R at 16: 9-16; *Pa. PUC v. Pennsylvania American Water Company*, Docket Nos. R-2023-3043189 and R-2023-3043190, Order entered July 22, 2024) Order, pp. 362-363 (the “2024 PAWC Rate Order”)

⁸⁶ PAWC St. 15-R at 25: 4-6.

⁸⁷ CAUSE-PA St. 1 at 54.

⁸⁸ *Id.* at 54-55.

1 designed, functioning properly, adhering to guidelines, and reaching customers in need of
2 assistance. I continue to stand by this recommendation.

3 **VII. CONCLUSION**

4 **Q: Does this conclude your surrebuttal testimony?**

5 **A: Yes.**

CAUSE-PA Statement 1-SR, Geller

Appendix A-SR

Interrogatories of CAUSE-PA to PAWC

PAWC Response to CAUSE-PA 01-019

PAWC Customer Assistance Advisory Group Presentation, December 15,
2025

**Pennsylvania-American Water Company
Docket Nos. R-2025-3057983 (Water)
R-2025-3058051 (Wastewater)
CAUSE-PA Set 1**

CAUSE-PA 01-019

Responsible Witness: Matthew Prine, Vice President and Chief Customer Officer

Question:

From January 2023 to present, which months, if any, were hardship fund grants not available to customers due to depletion of available funds.

Response:

The Company's water hardship fund was depleted of annual funds in the following months:

August 2024 and September 2024

The Company's wastewater hardship fund was depleted of annual funds in the following months:

September 2023

May 2024 – September 2024



Customer Assistance Advisory Group

December 15, 2025

H2O Program Updates- Grants from 2025-2026 Program Year

**HAVING
TROUBLE
PAYING
YOUR
MONTHLY
BILLS?**

We're here to help.

We know that sometimes our customers face difficult times that stretch their financial resources. We are committed to helping keep the water and life flowing for our customers.



Grant Fund Status: Open-Wastewater

Open- Water

Fund Balance: \$1,250,312

Grants Funded Program Year 2025-2026

1,466 Grants to customers

\$506,965

Of those grants provided the below totals are for customers between 200 and 250% of FPL

Provided 104 grants

Totaling \$37,557

H2O Program Updates

Bill Discount Program:

Over \$4.1 M in discounts for Q3
Discounts on over 20,000 bills

Discount Portability Q3

July	August	September
24	27	26



Conservation Kits and AMP

2025 Q2 Conservation Kits:
2,893 postcards sent
202 kits mailed



Total AMP Enrollments since 10/1/2024
5,490 Customers

Request your FREE conservation kit!

Scan the QR code to answer a few questions or call 717-550-1580. Please allow 4-6 weeks to receive your kit.

What the kit includes:
1 low-flow showerhead;
2 faucet aerators; 2 fill cycle diverters for your toilet;
Leak detection tablets;
Water-saving tips

¡Solicite su kit de conservación GRATUITO!
Escanee el código QR para responder a algunas preguntas, o llame al 717-550-1580. Solo espere de 4 a 6 semanas para recibir su kit.

¿Qué incluye el kit?
1 cabezal de ducha de caudal reducido; 2 aireadores del grifo; 2 desviadores del ciclo de llenado para inodoro; Tabletas de detección de fugas; Consejos para ahorrar agua



PENNSYLVANIA AMERICAN WATER
852 Wesley Drive
Mechanicsburg, PA 17055



PAHAF Funding Update

PAHAF

2025 YTD- \$54,145.34

Total funding from PAHAF

\$606,678.22



Customer Assistance Outreach Activities Northeast

- Continued attending popups at the Friends of the Poor Community Pantries
- Team members attended the Sr Fairs for Lackawanna and Luzerne Counties (September and October).
- Participated in the Scranton/Wilkes Barre Be Utility Wise in September and Berks Be Wise in October
- Kicked off a popup monthly series that ran for the Fall semester at Luzerne Community College
- Participated in two community trunk or treats in October



Customer Assistance Outreach Activities West

- September 5th - 3rd Annual Senior Expo State Representative Andrew Kuzma
- September 7th – The Knoxville Block Party
- September 8th and 23rd, November 6th, December 11th and 18th - The Lighthouse Food Pantry
- September 11th – Fayette County Twp. Supervisors Resource Fair
- September 12th – Kane Senior Citizens Expo
- September 13th – Community Resource Fair – New Castle
- September 18th – Be Utility Wise Conference
- September 19th – State Rep. Dan Miller’s Senior Fair
- September 24th – Warner/Grimm Senior Fair
- September 24th, October 16th, and November 18th – Clairton Utility Assistance Pop-Up)
- October 3rd – Allegheny County Area Agency on Aging Staff meeting
- October 10th – Caring Mission Open House/Uniontown
- October 15th – Greater Pittsburgh Food Bank Job and Resource Fair
- October 17th – 6th Annual Butler County Women Shaping Our Region
- October 20th – Kane Community Open House
- October 22nd – The State of The Food Bank
- October 22nd, November 19th, and December 17th – The Rainbow Kitchen Resource Fair
- October 27th – Collaborative Partners Meeting – Allegheny County Area Agency on Aging
- October 30th – Senator Pittman and Reps. Struzzi and Smith Senior Expo – Indiana
- November 7th – Utility, Benefits, and Housing Clinic – Johnstown
- November 13th – The Hilltop Alliance meeting about CAP
- November 19th – KDKA Turkey Fund check presentation



Customer Assistance Activities Central/Southeast

Representative Scott Resource Fair 9/7/2025
Harrisburg Salvation Army WARM event with UGI 9/9/2025, 10/14/2025, 11/18/2025
Representative Bradford Family Fair at the Zoo 9/9/2025
Montco Commissioner Tom DiBello Meeting 9/11/2025
Made video for H2O Awareness with Commissioner on 10/7/2025
Exeter Pop-up 9/23/2025, 9/30/2025, 10/7/2025
Meeting with York Veterans Outreach 9/24/2025
Harrisburg Salvation Army Fall Festival 9/25/2025
Steelton Community Fall Festival 9/28/2025
Steelton Pop-up 10/21/2025, 10/28/2025
AKA Energy Forum 11/8/2025

Be Utility Wise Events:

Tri-Region BUW – Harrisburg Friday, November 21st

Berks Be Wise Monday, October 20th



Paid Media Campaign Results

H2O Help to Others Focus

- Began in April and ended in late-September (5-month duration)
- Aimed to drive awareness of and participation in CAP among income-eligible households (earning less than \$60K/year)
- Platforms included: digital audio, connected TV (CTV), YouTube, digital display banners, social media (Facebook and Instagram)
- Results show strong performance:
 - More than 17.7 million impressions
 - Above benchmarks across tactics: Display drove the majority of clicks, CTV maintained video completion rates above 98%, and social media continued to deliver steady engagement. Digital audio has expanded reach significantly.



Recently Completed Projects

Media:

- Dollar Energy op-eds (distributed on regional basis for additional media coverage)
- Press release on payment arrangements for commercial customers
- Press release customer assistance offerings during government shutdown period
- Pennsylvania Business Central advertorial

Videos:

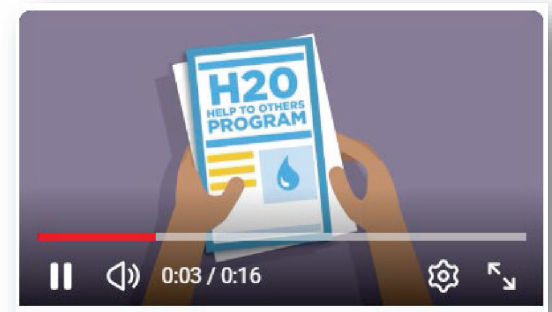
- 15- and 30-second income verification spots
- CBO spotlight video (Commission on Economic Opportunity)

Direct-to-customer:

- H2O onsert sent to all customers in bills during month of September and customer assistance-focused email to all customers later in month

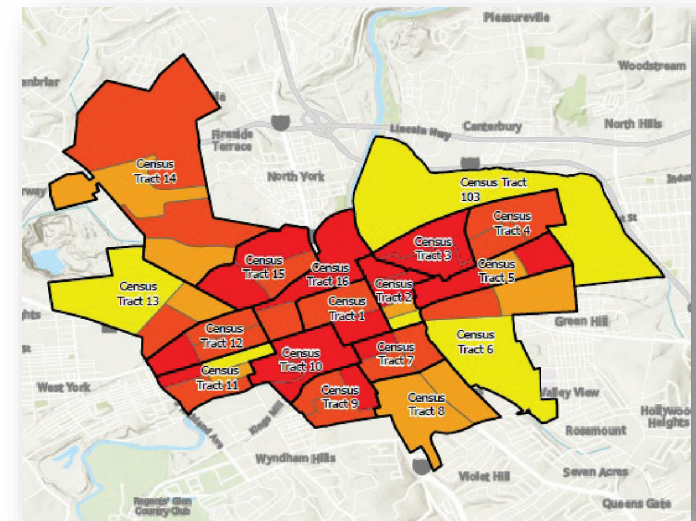
Government:

- H2O program background and promotion resources sent to general assembly as part of annual push
- H2O discussed with legislators during hill visits



Ongoing Projects

- Pop-up customer service events and corresponding customer communications.
- Texting pilot completed for 2025. We'll resume to resume in 2026 as part of plan to continue outreach on an annual basis. We're currently investigating the best platform to use for efforts in 2026.
- Door-to-door canvassing continues in partnership with CDM Smith:
 - York (completed)
 - Scranton (currently underway)
 - Coatesville (currently underway)
 - Foster Township (planned for 2026)
 - Norristown (planned for 2026)
 - McKeesport, including Dravosburg, Port Vue and Duquesne (planned for 2026)



Upcoming Projects

- Video to promote proposed Renter Assistance Program Pilot.
- H2O resource toolkit for third-party use in initial discussions.
- Revisions to H2O materials/web content for 2026 to update any FPIG changes.
- 2026 Paid media campaign.
- Additional CBO spotlight videos.
- Candid Counsel research findings.
- Inclusion of H2O information in direct-to-customer communications (emails, bills, etc.).

PENNSYLVANIA AMERICAN WATER
WE KEEP LIFE FLOWING™

H2O HELP TO OTHERS™

H2O Help to Others Program Assisting customers in need for decades

We want to help keep life flowing to our customers. One way we do this is through our customer assistance programs. If you're experiencing financial hardship, please reach out to us. We may be able to assist.

For more than 30 years, Pennsylvania American Water has been assisting customers who qualify through its H2O Help to Others Program™. Here's an overview of the programs we offer customers who qualify.

WATER SERVICE ASSISTANCE

- Grants of up to \$500 per household per year.
- A 30% to 50% discount on the monthly service fee and a 20% to 80% discount on the monthly volumetric charges, which saves the average residential customer using 3,201 gallons/month \$17.66 to \$64.99 every month.¹ See chart on reverse side.
- Water-saving devices and education, so customers can take an active part in reducing their water bill through wise water use.

NEW ARREARAGE FORGIVENESS PROGRAM

Residential customers enrolled in our H2O Help to Others monthly bill discounts may also be eligible for our Arrearage Forgiveness Program if they have a balance that is 60 or more days past-due and is at least \$150. Once accepted into the program, customers who pay their current monthly bill in full, plus a \$5 co-payment, will have \$25 of their past due balance forgiven.

HOW TO APPLY

- Apply online at dolcarenergy.org/myapp
- Visit dolcarenergy.org to find the organization in your community where you can apply
- Call Dollar Energy Fund at 1-888-262-6816
- Paper applications are available at pennsylvaniaamwater.com/H2O

WASTEWATER SERVICE ASSISTANCE

- Grants of up to \$500 per household per year.
- A 37% to 85% discount on the total wastewater charges, which saves the average residential customer using 3,201 gallons/month \$40.53 to \$93.12 every month.² See chart on reverse side.

OTHER PROGRAMS PENNSYLVANIA AMERICAN WATER OFFERS

- **Budget Billing** helps make managing your cash flow easier by providing predictable monthly payments and avoiding unplanned seasonal spikes.
- **Installment Plans** help to extend the time you have to pay a past due balance. Payment arrangements are also available for non-residential customers who qualify.
- **Preferred Due Date** enables eligible customers to adjust their due date.

To see if you are eligible or to enroll in the above programs, visit MyWater at amwater.com/mywater. In the **Payment Assistance** box, click **See All Options**. You can also contact our Customer Service Center.

Water Saving Tips and Tools

We offer tips and tools to help customers save water and money. Visit pennsylvaniaamwater.com. Under Water & Wastewater Information, select Detecting Leaks and Wise Water Use.

LEARN MORE ONLINE
Scan the QR code or visit pennsylvaniaamwater.com/H2O.

10-2025



Thank you

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
v. : Docket Nos. R-2025-3057983
 : R-2025-3058051
 :
Pennsylvania-American Water Company :
 :

VERIFICATION OF HARRY S. GELLER

I, Harry S. Geller, verify that the following testimony and appendices were prepared by me or under my direct supervision, and are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter:

- **Direct Testimony of Harry S. Geller on Behalf of The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), CAUSE-PA Statement 1**
 - 65 pages of written testimony
 - Exhibit 1: Water/Wastewater Burden Tables
 - Exhibit 2: Self-Sufficiency Standard Income Comparisons by County
 - Appendix A: Resume – Harry S. Geller
 - Appendix B: Cited Discovery Responses
- **CAUSE-PA Errata to the Direct Testimony of Harry S. Geller**
- **Surrebuttal Testimony of Harry S. Geller on Behalf of The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), CAUSE-PA Statement 1-SR**
 - 26 pages of written testimony

- Appendix A-SR: Cited discovery responses

I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).



Dated: March 18, 2026

Harry S. Geller

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Pennsylvania Public Utility Commission :
: Docket Nos. R-2025-3057983
: R-2025-3058051
v. :
: :
Pennsylvania-American Water Company :
:

PREPARED HEARING EXHIBIT LIST OF THE COALITION FOR AFFORDABLE UTILITY SERVICES AND ENERGY EFFICIENCY IN PENNSYLVANIA

The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) intends to move for admission of the following evidence at the March 22-24, 2026 evidentiary hearings in the above-captioned matter:

- **Direct Testimony of Harry S. Geller on Behalf of The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA), CAUSE-PA Statement 1**
 - 65 pages of written testimony
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 - 26 pages of written testimony
 - Appendix A-SR: Cited discovery responses
- **Verification of Harry S. Geller**

CAUSE-PA has not yet identified the scope of its possible cross-examination exhibits and reserves the right to supplement this list as its attorneys prepare for hearings. To the extent CAUSE-PA identifies any cross-examination exhibits in its preparation for hearings it will promptly notify your Honors and the parties.

Respectfully Submitted,
PENNSYLVANIA UTILITY LAW PROJECT
Counsel for CAUSE-PA



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Dated: March 18, 2026