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August 28, 2026

VIA ELECTRONIC FILING

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

**In re: Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56
Docket No. L-2025-3058767**

Dear Secretary Homsher:

On behalf of Pennsylvania-American Water Company, please find it's Comments in the above captioned matter.

Should you have any questions, please feel free to contact me.

Sincerely,

Erin K. Fure

Enclosures

cc: All Parties on the attached Certificate of Service (*via electronic mail*)
Stephanie A. Wilson, Esquire (*via electronic mail*)
Kriss E. Brown, Esquire (*via electronic mail*)
Karen Thorne (*via electronic mail*)
Bobbi Anderson (*via electronic mail*)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56	: : Docket No. L-2025-3058767 :
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CERTIFICATE OF SERVICE

I hereby certify that I am on this day serving the above-referenced Pennsylvania-American Water Company's **Comments** in the above-referenced matter upon the persons and in the manner indicated below, which service satisfies the requirements of 52 Pa. Code §1.54 (relating to service by a party).

SERVICE VIA ELECTRONIC MAIL ON AUGUST 28, 2026

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Respectfully submitted,



Dated: August 28, 2026

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**Attorney for *Pennsylvania-American
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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking to Further Amend the Provisions of 52 Pa.	:	
Code Chapter 56	:	Docket No. L-2025-3058767
	:	

COMMENTS OF PENNSYLVANIA-AMERICAN WATER COMPANY

I. INTRODUCTION

Pennsylvania-American Water Company (“PAWC” or the “Company”) submits these Comments in response to the Notice of Proposed Rulemaking Order (“NOPR” or “Order”) entered by the Pennsylvania Public Utility Commission (“PUC” or the “Commission”) on February 19, 2026 at the above-captioned docket and published in the Pennsylvania Bulletin on May 30, 2026. The NOPR solicits comments from stakeholders regarding the proposed modifications to existing regulations as well as proposed new regulations set forth in the Annex attached to the NOPR. PAWC will provide its comments in response to the NOPR.

II. COMMENTS IN RESPONSE TO NOPR

In this section, PAWC will provide comments in response to the NOPR. PAWC has organized its comments according to the section headings in the NOPR.

**A. Comments In Response To Proposed Modifications To Subchapter A
(Preliminary Provisions For Utilities And Customers Subject To Chapter
14 Of The Public Utility Code)**

In the NOPR, the Commission proposes to remove references to Chapter 14 of the Pennsylvania Public Utility Code (“Code”) from the existing title of Subchapter A of Chapter 56.

PAWC does not take issue with this proposal as the referenced Chapter 14 expired on December 31, 2024. The Commission has determined that even in the absence of Chapter 14, there is sufficient statutory support in Chapters 13 and 15 of the Code to preserve the efficacy of regulations codified at 52 Pa. Code Chapter 56.¹

The Commission also proposes to add language to the existing title of Subchapter A of Chapter 56 to indicate that Subchapters A through K apply to customers subject to the former Chapter 14 while Subchapters L through V of Chapter 56 apply to victims of domestic violence with a protection from abuse order or a court order issued by a court of competent jurisdiction in the Commonwealth, which provides clear evidence of domestic violence. PAWC does not oppose this proposal as the addition of the new language may signal to those unfamiliar with Chapter 56 that there are regulations that are specifically applicable to victims of domestic violence.

B. Comments In Response to Proposed Modifications to § 56.2 (Definitions)

The Commission proposes to add definitions to Section 56.2 for “change in income” and “significant change in circumstance” and explains that the proposed definitions are consistent with the former Chapter 14. PAWC does not oppose the Commission’s proposal with respect to adding these definitions to Section 56.2 as the proposed definitions mirror the definitions that were found in the former Section 1403 of the Code. PAWC suggests, however, that with respect to subsection (ii) in the definition for “significant change in circumstance”, that the terms “verifiable damage” replace “catastrophic damage” to reduce subjectivity with regard to what would qualify as a significant change in circumstance as “catastrophic damage” is not otherwise defined in Chapter 56.

¹ See Statement of Policy, entered December 24, 2024 at Docket No. M-2024-3052328.

C. Comments In Response to Proposed Modifications to § 56.22 (Accrual of Late Payment Charges)

The Commission proposes in the NOPR to modify the existing Section 56.22 by adding language that requires public utilities to waive late payment charges on any customer accounts if the charges were improperly assessed. The Commission explains that this language is consistent with the former Chapter 14 of the Code. PAWC does not oppose the proposed language as it is identical to language contained in former Section 1409 of the Code. PAWC takes no issue with the requirement that late payment charges be waived on customer accounts if the charges were improperly assessed.

The Commission also proposes eliminating references to former Section 1409 of the Code in Section 56.22 as Chapter 14 has expired. PAWC does not oppose this proposal.

D. Comments In Response to Proposed Modifications to § 56.102 (Residential Field Visit Charge)

Proposed Section 15.102 would apply only to a city natural gas distribution operation. Accordingly, PAWC does not take a position on this proposed new regulation.

E. Comments In Response to Proposed Modifications to § 56.153 (Public Utility Duties)

The NOPR contains a proposal for a new regulation to address public utility duties regarding customer or applicant contact for payment arrangements. The Commission explains that the proposed Section 56.153 is consistent with the former Section 1410.1 of the Code. PAWC largely does not oppose the proposed Section 56.153 as the language is similar to the requirements contained in the former Section 1410.1 of the Code.

F. Comments In Response to Proposed Modifications to § 56.171 (General Rule)

The Commission proposes modifications to Section 56.171 to add language that aligns with former Section 1410 of the Code and the Commission’s Formal Complaint Form. PAWC supports the addition of subsection (b) to Section 56.171, which proposes that the Commission will accept formal complaints that are not requests for review of informal complaint decisions only from complainants who affirm they have first contacted the public utility for the purpose of resolving the issues about which the complainant wishes to file a complaint. PAWC respectfully suggests that the word “dispute” be used in lieu of the word “problem” in the proposed language to better align with existing language in other Chapter 56 regulations. PAWC believes this requirement will reduce the administrative resources the Commission expends in processing and adjudicating formal complaints as it compels the public utility and complainant to attempt to reach a resolution directly before escalation to the Commission.

The Commission further proposes to modify the title of Section 56.171 to “General rule for formal complaints” to promote clarity. PAWC supports the addition of the clarifying language to the title of Section 56.171.

G. Comments In Response to Proposed Modifications to § 56.181 (Duties of Parties; Disputing Party’s Duty to Pay Undisputed Portion of Bills; Public Utility’s Duty to Pay Interest Whenever Overpayment Found)

The Commission proposes modifications to Section 56.181 to include language regarding the obligation of a customer to pay subsequent bills which are not in dispute. PAWC supports this proposed clarifying language as it provides a bright line directive that customers have a continuing obligation to pay their undisputed bills for public utility service, even pending the resolution of an informal or formal complaint.

H. Comments In Response to Proposed Modifications to § 56.182 (Payment Arrangement Procedures)

The Commission proposes to create a new regulation at Section 56.182 to address payment arrangement procedures. The proposed Section 56.182 aligns with the former Section 1405(a) through (e) of the Code. PAWC does not oppose the addition of the proposed Section 56.182 as it mirrors the payment arrangement procedures contained within former Section 1405(a) through (e) of the Code and is thus a familiar, workable, and easily continued structure to govern payment arrangements.

I. Comments In Response to Proposed Modifications to § 56.225 (Surcharges for Uncollectible Expenses Prohibited)

The Commission proposes a new regulation at Section 56.225 to align with language from the former Section 1408 of the Code. The Company does not support the addition of the proposed Section 56.225 as it precludes a public utility from having the ability to *propose* a surcharge for uncollectible expenses. The Commission can issue determinations on a case by case basis should a utility make such a proposal, but the Company does not believe that a blanket prohibition memorialized in a regulation is necessary given that the Commission has complete discretion to make the appropriate determination if a proposal is properly before it. Notably the proposed language indicates that Section 56.225 will have no effect on any clause associated with universal service and energy conservation. Water and wastewater utilities do not have universal service and energy conservation programs, and such framework is not available to utilities other than electric and natural gas distribution companies.

J. Comments In Response to Proposed Modifications to § 56.251 (Statement of Purpose and Policy)

The Commission proposes modifications to Section 56.251 to eliminate references to the former Chapter 14 of the Code. PAWC does not oppose the proposed modifications to this section as the former Chapter 14 of the Code has expired.

III. CONCLUSION

PAWC thanks the Commission for this opportunity to submit comments in response to the NOPR and for considering the comments contained herein.

Respectfully submitted,



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Date: August 28, 2026