



VIA E-FILING

October 13, 2026

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
400 North Steet
2nd Floor, Room-N201
Harrisburg, PA 17120

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

Dear Secretary Homsher:

Enclosed here are the Reply Comments of Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc. to the Pennsylvania Public Utility Commission's Rulemaking to Further Amend the Provisions of 52 Pa. Code Chapter 56.

If you have any questions regarding this filing, please contact me at 610-645-1130 or by email at astahl@aquaamerica.com.

Sincerely,



Alexander R. Stahl
Regulatory Counsel

cc: Stephanie A. Wilson, Law Bureau (via email)
Kriss E. Brown, Law Bureau (via email)
Karen Thorne, Law Bureau (via email)
Bobbi Anderson, Bureau of Consumer Services (via email)

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**REPLY COMMENTS OF AQUA PENNSYLVANIA, INC. AND
AQUA PENNSYLVANIA WASTEWATER, INC.**

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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

**REPLY COMMENTS OF AQUA PENNSYLVANIA, INC. AND
AQUA PENNSYLVANIA WASTEWATER, INC.**

Aqua Pennsylvania, Inc. and Aqua Pennsylvania Wastewater, Inc. (“Aqua” or the “Company”) respectfully files the following Reply Comments to the various comments filed to Pennsylvania Public Utility Commission’s (“Commission”) February 29, 2026, Notice of Proposed Rulemaking Order (“NOPR Order”) in the above captioned docket. The Commission’s NOPR Order seeks to incorporate the provisions of the former Chapter 14, as they existed at their sunset of the Public Utility Code into its Chapter 56 regulations.

I. INTRODUCTION

Aqua filed its letter in lieu of Initial Comments on August 28, 2026 supporting the Commission's efforts to expeditiously incorporate the provisions of Chapter 14 into the Chapter 56 regulations. The Company did not have any suggested changes or edits to the regulations in Annex A of the NOPR Order.

Aqua welcomes the opportunity to file its Reply Comments to the comments filed by various stakeholders to the Commission's NOPR Order.

Aqua serves approximately 1.5 million customers in Pennsylvania through 33 counties.

Aqua provides water service to approximately 460,000 customers and Aqua provides wastewater

service to approximately 68,000 customers in Pennsylvania. Aqua's water and wastewater systems serve both rural and urban areas.

Aqua acknowledges the significant effort that has been made by the Commission, utilities, and interested parties, beginning with the original Chapter 14 Order and the reauthorization of Chapter 14 in 2014. As noted by the Commission in its NOPR Order, Chapter 14 was enacted when "the General Assembly determined that the Commission's prior rules had not successfully managed the issue of bill payment that increasing amounts of unpaid bills threatened paying customer with higher rates due to other customers delinquencies. Accordingly, the goal of the former Chapter 14 was to increase timely collections, while ensuring that service is available to all customer based on equitable terms and conditions." (NOPR Order p. 6) Beginning with the original Chapter 14 Order and the reauthorization in 2014, parties have been working toward the original goals set in the adoption of Chapter 14. The changes made to Chapter 14 to the collection, service application, and payment arrangement rules allowed utilities to improve their efforts to collect money for the service they provide in an effective and responsible manner. It is important to remember that the Company's goal is not to terminate a customer's service. The Company has numerous programs in place to assist customers in lieu of termination.

The Company agrees with the various commentors in this docket advocating that the Commission limit this proceeding to the provisions contained in Annex A of the NOPR Order. Aqua submits that many of the commentors have raised important issues in their various comments, but the breadth and scope of the many of comments are significantly outside the scope of the NOPR Order. The Company submits that many of the suggested changes offered are more appropriately considered in a separate, more comprehensive rulemaking proceeding.

II. COMMENTS

Aqua affirms its position stated in its August 28, 2026, filing that it has no suggested edits or changes to the proposed regulations in Annex A. Aqua also agrees that the NOPR Order is “not intended as a general review of Chapter 56 regulations.” (NOPR Order p. 12). Aqua’s review of the various initial comments filed in this docket is that the commenters are seeking to significantly expand the scope of this rulemaking to a general review of the entirety of Chapter 56. Aqua is not responding to each and every proposed modification, but offers the following comments.

Many commenters seek to expand the rules relating to the length and number of payment arrangements a customer may have and they also seek to limit a customer’s payment arrangement to 20% of the customer’s average bill. Aqua submits that this change would require significant resources to program its customer billing system and could extend payment terms well beyond a reasonable repayment length. The Company believes that the existing payment arrangement timelines with the existing income categories is appropriate and should be maintained.

The Office of Consumer Advocate (“OCA”) states that “in addition to the protections afforded under Chapter 56, the OCA similarly recommends that ‘universal service’ requirements now applicable to energy utilities should also be made applicable to water/wastewater as well so that those protections are standardized.” (OCA Comments, p. 21). While Aqua has implemented a customer assistance program (“CAP”) with a number of elements of Aqua’s assistance programs being similar to those in the electric and gas industries, the Company submits that this limited rulemaking is not the appropriate forum to mandate that all the existing Universal Service Requirements that are current in place for electric and gas utilities should be applicable to water/wastewater utilities. The Universal Service Requirements are not currently in Chapter 56

for electric and gas utilities, thus including these requirements for the water and wastewater utilities as part of Chapter 56 is not appropriate.

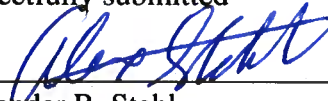
Aqua's CAP was implemented in 2021, and Aqua has expanded the program, improving the benefits provided to Aqua's limited-income customers. Aqua's programs serve customers with household incomes up to 200% of the federal poverty limit, exceeding the income guideline used by energy utilities under the CAP Policy Statement. Aqua has a Customer Assistance Collaborative that meets quarterly to review its programs with interested stakeholders. Aqua does screen customer calls for income eligibility for program participation including at the customer's initial call for service as well as when a customer contacts the Company regarding bill payments. Furthermore, the Company does waive late payment charges for its CAP participants.

Other suggested revisions to Chapter 56 include expansion of termination moratoriums to cover summer months and to have those summer moratoriums apply to water utilities, extension of the length of termination notices, as well as expansion of medical certifications. As stated above, the Company submits that these suggestions are beyond the scope of this proceeding and are significant changes that are likely to increase costs to utilities and customers.

III. CONCLUSION

Aqua appreciates the opportunity to comment on the Commission's Rulemaking and asks that the Commission consider its comments. Aqua looks forward to continuing to work with the Commission on these issues. Please direct any questions with regard to these comments to the undersigned.

Respectfully submitted



Alexander R. Stahl
PA Attorney ID No. 317012
Regulatory Counsel
Aqua Pennsylvania, Inc.
762 W. Lancaster Ave.
Bryn Mawr, PA 19010
Phone: 610-645-1130
astahl@aquaamerica.com

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