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October 13, 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 Reply Comments in the above captioned matter.

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

Sincerely,

A handwritten signature in blue ink that reads "EK Fure".

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 **Reply 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 OCTOBER 13, 2026

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Respectfully submitted,



Dated: October 13, 2026

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

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

REPLY COMMENTS OF PENNSYLVANIA-AMERICAN WATER COMPANY

I. INTRODUCTION

Pennsylvania-American Water Company (“PAWC” or the “Company”) submits the following Reply Comments in response to issues raised by stakeholders in their comments 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 solicited 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. On August 28, 2026, PAWC and other stakeholders provided comments in response to the NOPR. The Company’s decision not to address certain stakeholder comments should not be interpreted as the Company’s support for such comments.

II. REPLY COMMENTS IN RESPONSE STAKEHOLDER COMMENTS TO PROPOSED MODIFICATIONS TO CHAPTER 56 SPECIFICALLY ADDRESSED IN NOPR

In this section, PAWC will provide reply comments in response stakeholder comments that addressed the proposed modifications to Chapter 56 that were listed in the NOPR. PAWC has organized its reply comments according to the section headings in the NOPR.

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

PAWC's Comments submitted on August 28, 2026, noted that the Company did not oppose the Commission's proposed modifications to the existing title of Subchapter A of Chapter 56 as the proposed new language may signal to those unfamiliar with Chapter 56 that there are regulations specifically applicable to victims of domestic violence. Based on this reasoning, PAWC does not agree with the alternative modifications to the existing title of Subchapter A that were proposed by the Joint Comments of the Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (CAUSE-PA) and Tenant Union Representative Network (TURN) ("Comments of the Low-Income Advocates").

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

PAWC does not agree with the Comments of the Low-Income Advocates or the Comments of the Office of Governor Josh Shapiro ("Comments of the Shapiro Administration") which both propose alternative definitions for "change in income" and "significant change in circumstance." These alternative definitions would deviate greatly from the definitions proposed by the Commission in the NOPR, which were consistent with the former Chapter 14. The Company does not have estimates of the costs and/or savings that could be associated with complying with the proposed broadened definitions. By contrast, maintaining the same definitions that had been in

place under the former Chapter 14 would have no or minimal compliance cost or savings impact to the Company. For the same reasons, PAWC does not agree with the broader definition of life event for customers at or above 300% of the Federal Poverty Level proposed by the Comments of the Office of Consumer Advocate (“Comments of the OCA”).

PAWC does not oppose the modifications to Section 56.2 that are proposed in Comments of PPL Electric Utilities Corporation on the Notice of Proposed Rulemaking (“Comments of PPL”) to add a more objective standard to whether a loss is significant.

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

The Comments of the Low Income Advocates propose further modifications to Section 56.22 that would require the Commission to order a waiver of late payment charges levied by a public utility as a result of a delinquent account for customers with a gross monthly household income not exceeding 300% of the Federal Poverty Level. A similar modification is proposed in the Comments of the Shapiro Administration, which also proposed that utilities be prohibited from charging reconnection fees for customers below 300% of the Federal Poverty Level. Additional stakeholders submitted comments proposing the elimination fees and reconnection fees.¹ The Company does not have estimates of the costs and/or savings that could be associated with complying with the modifications to Section 56.22 proposed by these stakeholders. By contrast, maintaining the existing framework would have no or minimal compliance cost or savings impact to the Company. For the reasons provided in its Comments, PAWC opposes the modifications to Section 56.22 proposed by other stakeholders.

¹ See Comments submitted by Center for Coalfield Justice (“Comments of CCJ”); Comments of the Consumer Advisory Council to the Pennsylvania Public Utility Commission (“Comments of CAC”); and Recommendations of the Joint Commenters for Utility Access.

However, PAWC does not oppose the modification to Section 56.22 proposed by the Comments of the OCA, which suggested replacing the word “only” with the word “also” in the last sentence of Section 56.22(d).

D. Reply Comments In Response To Comments Addressing Proposed Modifications To § 56.102 (Residential Field Visit Charge)

Section 56.102 would apply only to a city natural gas distribution operation, therefore PAWC does not have any reply comments on the above-listed topic.

E. Reply Comments In Response To Comments Addressing Proposed Modifications To § 56.153 (Public Utility Duties)

PAWC supports the Comments of PECO Energy Company on the Notice of Proposed Rulemaking Order (“Comments of PECO”) regarding its request for utilities to have flexibility regarding referral processes and procedures as PAWC agrees that flexibility will further the Commission’s goals of maintaining consistency for customers and utilities while avoiding unnecessary expense and administrative burden. Additionally, PAWC supports the Comments of PPL that civil fines or sanctions on utilities for high customer account balances should be eliminated. As the Comments of PPL articulate, utilities are already amply motivated to work with our customers to help prevent large arrearages and high-balance accounts can occur as a result of factors that prevent collection on overdue accounts. As suggested in the Comments of Citizens’ Electric Company of Lewisburg, PA, Wellsboro Electric Company and Valley Energy, Inc. to February 19, 2026 Notice of Proposed Rulemaking Order (“Comments of C&T Utilities”), the Commission should at some point consider enhancements that limit opportunities for abuse of the Chapter 56 system.

The Comments of the OCA raised the issue that subsection (4) of the former Section 1410.1 was not proposed to be included as a modification to Section 56.153 and pointed to Sections 56.231(b)(11) and (12) as the likely explanation for that omission. PAWC supports the

determination to eliminate duplicate reporting requirements and believes Section 56.231 amply covers the reporting requirements of former Section 1410.1.

The Comments of the Low-Income Advocates proposed modifying Section 56.153 to include a requirement for public utilities to screen all new and moving applicants for eligibility in the utility's universal service and energy conservation programs before they fall behind. As a water and wastewater utility, PAWC does not have a universal service and energy conservation program ("USECP"). The Comments of the Shapiro Administration take a broader approach and state that the Commission should require utilities to screen customers to identify those whose income level qualifies them for beneficial program or rules, such as a customer assistance program. To the extent that such screening requirements would apply to utilities that have customer assistance programs that are not USECP, the Company has not performed any analysis as to the costs or savings the Company would incur to comply with such a requirement. Furthermore, costs related to expansion of PAWC's customer assistance programs can, at this point, only be recovered by the Company through a rate base proceeding. The Company has serious concerns that forced expansion of its customer assistance programs would put PAWC in an undesirable position of having to file a rate case sooner than it otherwise would to recover the costs of these proposals. PAWC does not support the proposals in the Comments of the Low-Income Advocates or the Comments of the Shapiro Administration with regards to modifying Section 56.153.

F. Reply Comments In Response To Comments Addressing Proposed Modifications To § 56.171 (General Rule)

PAWC does not oppose the Comments of the OCA noting that the requirement to discuss with the utility should not be applicable to formal complaints regarding base rate proceedings.

G. Reply Comments In Response To Comments Addressing 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)

PAWC does not agree with the proposed modification to Section 56.181 by the Comments of the Low-Income Advocates to remove “the consumer services representative determines” from subsection (2). Although “consumer services representative” is not specifically defined, read within the context of the other regulations in the Chapter, it is clear that the reference is to a determination made by a representative of the Bureau of Consumer Services. Formal complaints may be appeals from informal decisions rendered by consumer services representatives and the Company does not believe that the modifications proposed in the Comments of the Low-Income Advocates are necessary.

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

The Comments of the OCA, the Comments of the Low-Income Advocates, and the Comments of Shapiro Administration all proposed modifications to Section 56.282 as alternatives to the modifications proposed by the Commission in the NOPR. Several stakeholders filed comments which proposed modification to payment arrangement framework generally, without specific references to Section 56.182.² The Company does not have estimates of the costs and/or savings that could be associated with complying with the modifications to the existing payment arrangement framework proposed by these stakeholders. By contrast, maintaining the same payment arrangement procedures that had been in place under the former Chapter 14 would have no or minimal compliance cost or savings impact to the Company. For the reasons provided in its

² Comments of CEO; Comments of CAC; Comments of CCJ; Recommendations of the Joint Commenters for Utility Access; Joint Comments of Pennsylvania Ratepayers; Comments of The Energy Justice Lab

Comments, PAWC does not oppose the addition of Section 56.182 as proposed by the NOPR but does not support any modifications proposed by other stakeholders.

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

PAWC supports the Comments of PPL on the modifications to Section 56.225 as the arguments made by PPL mirror those made in PAWC's Comments. Similarly, PAWC agrees with the Comments of the Energy Association of Pennsylvania to February 19, 2026, Notice of Proposed Rulemaking Order ("Comments of EAP") that removing this prohibition from the regulation will allow optimal flexibility in considering rate mechanisms.

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

The Comments of the Low-Income Advocates propose modifications to Section 56.251 which would expand the means by which the status as a survivor of domestic violence could be certified, including submitting (1) a court order, court records, or police report; (2) a statement of a medical provider or a domestic violence counselor/advocate, as defined in 23 Pa. C.S. Chapter 61; or (3) a self-affirmation that the individual or member of the individual's family or household is a victim of domestic violence. The Company does not have estimates of the costs and/or savings that could be associated with complying with the proposed broadened methods of certifying status. By contrast, maintaining the same certification methods that had been in place under the former Chapter 14 would have no or minimal compliance cost or savings impact on the Company. For these reasons, PAWC cannot at this time support the Comments of the Low-Income Advocates.

**III. REPLY COMMENTS TO COMMENTS ON CHAPTER 56
MODIFICATIONS NOT PROPOSED BY THE NOPR**

The NOPR states, "We also note that the instant rulemaking is not intended as a general review of Chapter 56 of the Commission's regulations. This rulemaking is intended to

expeditiously amend the Chapter 56 regulations to address the areas identified above and provide prompt regulatory certainty in light of the expiration of Chapter 14 of the Code.”³

The NOPR additionally states, “While we recognize that a general review to evaluate whether there is a need for further amendments to the Chapter 56 regulations may be necessary in the future, this rulemaking serves to incorporate the provisions of the former Chapter 14 of the Code, as it was in effect prior to its sunset, including those currently being followed by the Commission via its Statement of Policy.”⁴

Several stakeholders provided comments well beyond the articulated scope in the NOPR. PAWC respectfully requests that the Commission follow its own guidance laid out in the NOPR and continue to focus this rulemaking on efficiently amending the Chapter 56 regulations to incorporate the provisions of the former Chapter 14 of the Code to provide regulatory certainty.

In the section below, PAWC provides reply comments in response stakeholder comments that addressed modifications to Chapter 56 that were **not** listed in the NOPR. PAWC has organized its reply comments according to common issues raised in stakeholder comments. Again, the Company’s decision not to address certain stakeholder comments should not be interpreted as the Company’s support for such comments.

A. Eliminating Personal Contact Requirement in Section 56.94

The Comments of PPL suggested the elimination of the same day personal contact requirement in 52 Pa. Code § 56.94. PAWC supports such a modification to Chapter 56 and agrees with the Comments of PPL that the elimination of the personal contact requirement would eliminate safety risks faced by utility workers associated with terminations. For the same reasons,

³ Notice of Proposed Rulemaking, entered February 19, 2026, at Docket No. L-2025-3058767, p. 12.

⁴ *Id.*

PAWC does not support the modifications to Sections 56.93(a)(2) and 56.94 proposed in the Comments of the OCA and the Comments of the Low-Income Advocates.

B. Termination Moratoriums

Multiple stakeholders proposed various forms of a moratorium on terminations during periods of heat (“Summer Moratorium”).⁵ The Summer Moratorium proposals in the stakeholder comments differed in terms of what would be the initiating event (*e.g.* temperature standard versus date standard, etc.) to trigger a cessation of termination activity. The Company does not have estimates of the costs and/or savings that could be associated with complying with the various forms of the Summer Moratorium proposals. Therefore, PAWC does not support any of the stakeholder proposals for a Summer Moratorium.

The Comments of CAC, the Comments of the OCA, and the Comments of the Low Income Advocates suggested modifying the existing winter moratorium (52 Pa. Code §56.100) on terminations to water and wastewater service generally, thereby expanding the existing prohibition beyond heat-related services for these types of utilities. The Company does not have estimates of the costs and/or savings that could be associated with complying with the proposed modifications to the existing Section 56.100. By contrast, maintaining the same rules that are in place would have no or minimal compliance cost or savings impact to the Company. Accordingly, PAWC does not support any the stakeholder comments that proposed expansion of the winter moratorium to water and wastewater utilities for non-heat related services.

⁵ See Comments of CAC; Comments of CCJ; Comments of the Shapiro Administration; Recommendations of the Joint Commenters for Utility Access; Comments of the Commission on Economic Opportunity (“Comments of CEO”); Joint Comments of Pennsylvania Ratepayers; Comments of The Energy Justice Lab; Comments of Health, Education, and Legal Assistance Project: A Medical-Legal Partnership (“Comments of HELP:MLP”); Comments of the Low Income Advocates.

C. Medical Certificate Parameters

Various stakeholders submitted comments suggesting that the Commission modify Chapter 56 to expand the existing medical certificate rules.⁶ The Company does not have estimates of the costs and/or savings that could be associated with complying with the numerous proposed modifications to the existing medical certificate rules. By contrast, maintaining the same rules that are in place would have no or minimal compliance cost or savings impact to the Company. Accordingly, PAWC does not support any of the comments submitted regarding the modification to the existing medical certificate rules.

D. Call Center Access and Customer Service Standards

The Comments of CAC proposed the Commission to consider implementing new regulations regarding the use of automated call systems and undertake a review its policies for monitoring call center performance. The Company does not have estimates of the costs and/or savings that could be associated with complying with the proposals made in the Comments of CAC regarding call centers. Therefore, PAWC does not support the Comments of CAC on this topic.

E. Modifications Concerning Domestic Violence Survivors

Various stakeholders submitted comments suggesting that the Commission modify Chapter 56 to modify the regulations applicable to domestic violence survivors.⁷ The Company does not have estimates of the costs and/or savings that could be associated with complying with the numerous proposed modifications to the regulations applicable to domestic violence survivors. By contrast, maintaining the same rules that are in place would have no or minimal compliance

⁶ Comments of CAC; Recommendations of the Joint Commenters for Utility Access; Comments of the Shapiro Administration; Joint Comments of Pennsylvania Ratepayers; Comments of HELP:MLP; Comments of the OCA; Comments of the Low-Income Advocates.

⁷ Recommendations of the Joint Commenters for Utility Access; Joint Comments of Pennsylvania Ratepayers; Comments of the Low-Income Advocates; Comments of the Pennsylvania Coalition Against Domestic Violence.

cost or savings impact to the Company. Accordingly, PAWC does not support any of the comments submitted regarding the modification to the existing rules at this time.

F. Expansion of Universal Service Requirements to Water/Wastewater Utilities

The Comments of the OCA recommended that the universal service requirements which are currently applicable to energy utilities should be expanded to apply to water and wastewater utilities as well. The Company does not have estimates of the costs and/or savings that could be associated with complying with the proposed modifications. By contrast, maintaining the same rules that are in place would have no or minimal compliance cost or savings impact to the Company. Additionally, if there are additional requirements that would be imposed on water and wastewater utilities that mimic universal service requirements for energy utilities, the Company believes it would be appropriate and necessary to allow water and wastewater utilities the same cost recovery opportunities that are available to energy utilities. Accordingly, PAWC does not support the modifications in the Comments of the OCA as proposed.

G. Disconnection Notice Requirements

The Comments of the Shapiro Administration proposed several modifications to the existing framework surrounding disconnection notices. The Company does not have estimates of the costs and/or savings that could be associated with complying with the proposed modifications to the disconnection noticing requirements. By contrast, maintaining the same rules that are in place would have no or minimal compliance cost or savings impact to the Company. Accordingly, PAWC does not support any of the modification to the existing disconnection noticing rules.

H. Expansion of Chapter 56 to Small Commercial Business Consumers

The Comments of the Office of Small Business Advocate (“Comments of OSBA”) recommend inclusion in Chapter 56 of “Small Commercial Business customers” defined in the Comments of OSBA as “a person or business entity that employs fewer than 250 employees and which receives public utility services under a small commercial, small industrial or small business rate classification.” The Company does not have estimates of the costs and/or savings that could be associated with complying with the modifications proposed in the Comments of OSBA. By contrast, maintaining the same rules that are in place would have no or minimal compliance cost or savings impact to the Company. As described in the Company’s water and wastewater tariffs, PAWC currently does offer payment arrangements to commercial customers. Accordingly, PAWC does not support the modifications proposed in the Comments of OSBA.

IV. CONCLUSION

PAWC thanks the Commission for this opportunity to submit reply comments in response to the NOPR and other stakeholders’ comments, and for considering the reply comments contained herein.

Respectfully submitted,



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