



The York Water Company

June 9, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Bureau of Consumer Services
P.O. Box 3265
Harrisburg, PA 17105-3265

RE: Docket No. M-2020-3020055
COVID-19 Customer Service, Billing, and Public Outreach Provisions

Dear Secretary Chiavetta:

The York Water Company is pleased to respond to the Commission's request for utility information concerning the above referenced docket. Responses to the questions are as follows:

I. COVID-19 Utility Consumer Service and Billing Policies and Procedures

Describe and report efforts to support customers through initiatives in customer service and billing policies and procedures in response to the COVID-19 pandemic and the ensuing recovery period. Explain how these initiatives differ from normal operations:

Answer: The York Water Company proactively suspended billing-related service shutoffs and applying late payment charges to accounts past due. We also turned water service back on for customers who were previously shutoff for non-payment. These actions were taken prior to the Commission's Emergency Order on Termination at Docket No. M-2020-3019244 to suspend shutoffs and return water service to customers. Our efforts also included customers whose water service was turned off for non-payment of sewer service, even if The York Water Company is not the sewer service provider. The Company acknowledges that many of its customers are facing hardships during this time and recommended that customers pay as much they can, when they can.

The above initiatives differ from our normal operations.

Termination of Utility Service:

- After the Commission's Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment?

Answer: After the Emergency Order ends, the Company will determine the appropriate timeline to resume termination of service.

- How does the utility plan to implement terminations and will it start the process with new termination notices?

Answer: The Company will establish a start date to resume collections and inform delinquent customers of that date by mailing a softly worded dunning letter. The information contained in the termination notices will reflect the current past due balance.

- Broken out by customer class, how many customer accounts may be subject to termination if the Commission’s Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?

Answer:

Customer Accounts Subject To Termination	
RESIDENTIAL:	4565
COMMERCIAL:	167
INDUSTRIAL:	15
PUBLIC:	6
TOTAL:	4753

As of the date of this request, 4,753 accounts may be subject to termination if the Commission’s Emergency Order prohibiting terminations is rescinded. In comparison to the same time period in 2019, 3,057 accounts were subject to termination. This represents an increase of 55.5% over 2019.

- Provide these figures for all utility confirmed low-income customers. Including Lifeline and Customer Assistance Program (CAP) customers.

Answer: Of the total number of customer accounts subject to termination, 337 are known low-income customers.

- Provide future projections if available.

Answer: Future projections are unknown.

- Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

Answer: Under normal conditions, the Company does assess a reconnection fee to restore service. The fee is billed at the time of the shut off and collected at the time of the service restoration. Due to the COVID-19 pandemic, the Company decided to waive reconnection fees to restore service.

Universal Service Programs:

- Is the utility currently removing customers from CAP for non-payment or failure to recertify?

Answer: No

- What are the utility's current Hardship Fund payment requirements to qualify low-income customers for grants (e.g., waiving payment history "good faith payment", or CAP participation criteria) and have these requirements been revised due to the pandemic?

Answer: The Company has a York Water Cares Program and partners with local charities to offer a one-time per year grant of up to \$200.00 for low-income customers who are behind on their water or wastewater bill. Although the program is designed to help low-income customers, it may also be used to aid customers who have a short-term challenge in making ends meet and need assistance paying their bill.

Other Assistance Initiatives:

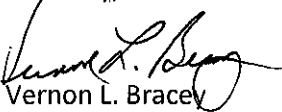
- Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in the PUC policies or regulations.

Answer: In addition to the Company's CAP to offer a grant of up to \$200.00 for qualified customers, the Company also encourages customers behind on their bill to enter into a payment agreement.

- Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor's Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted.

Answer: Inactive customers with a past due balance of at least 90 days are placed in a queue to be sent to a collection's agency. As a result of the pandemic, the Company intends to expand the timeline from 90 days to 120 days.

Sincerely,



Vernon L. Bracey

Vice President-Customer Service



The York Water Company

II. Consumer Education and Outreach

Consumer Education and Outreach Strategies related to the COVID-19 pandemic and the ensuing recovery period.

The York Water Company has used several different avenues to communicate with our customers and ratepayers regarding our new practices resulting from the COVID-19 pandemic, as well as their rights and responsibilities. Our website, www.yorkwater.com, has been the main forum for our up-to-date communications, but we have also utilized social media and interviews with two media outlets, Our York Media and Central Penn Business Journal.

We have an 'ALERTS & NOTICES' section on the homepage of our website that has been updated as our practices have changed during the pandemic, including the change from the Red Phase to the Yellow Phase in Governor Wolf's plan for relief, reopening and recovery. The alert link that has been updated is <https://www.yorkwater.com/coronavirus-covid-19/>. This alert includes a link to a document entitled "The York Water Company Response to COVID-19," which includes the rights of our customers, the continued safety of our drinking water, our changed processes, and details of the York Water Cares Program. This document can be found at <https://www.yorkwater.com/wp-content/uploads/YWC-RESPONSE-TO-COVID-19-for-Website-UPDATE-MAY-21-2020.pdf>. There is also a large, prominent banner on our website that is clickable and will take customers to this informative document, as well.

We have separately posted updates on our company Facebook, Twitter, and LinkedIn accounts in order to reach even more of our customer base that may not actively view our website.

Our CEO and President, JT Hand, did an interview with Rebecca Hanlon of Our York Media regarding donations The York Water Company made to local non-profits during the COVID-19 pandemic. This article can be found at <https://ouryorkmedia.com/stories/york-water-company-donates-500000-to-local-nonprofits-when-they-need-it-most/>.

Mr. Hand also did an interview with Jennifer Deinlein, a writer with the Central Penn Business Journal regarding crisis management during the COVID-19 pandemic. The article (<https://www.cpbj.com/talking-crisis-management-j-t-hand-president-ceo-york-water-company/>) was posted on April 24, 2020, and discussed our approach to customer service and the anxieties that we are sure our customers are feeling during this time.