

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:

During the COVID-19 pandemic, SUEZ quickly transitioned its customer service workforce to work remotely. This transition was seamless to our customers as SUEZ was able to maintain all call performance metrics during the transition.

SUEZ made various updates to its website, including a landing page designated to COVID-19 communications. Within this landing page, there are frequently asked questions, a letter to customers, press releases, and a video update from the CEO. Most of this content can also be found through promotions on SUEZ's Facebook page and Twitter. Within the communications, the company shared information about protecting the health and well-being of customers and employees, following the guidelines of national health officials and government leaders.

As of March 11, 2020, SUEZ stopped all water terminations. In addition, SUEZ waived all late fees, which was not required by the Commission's Emergency Order on Terminations, Docket No. M-2020-3019244. Finally, SUEZ restored all water services to customers that had been shut off prior to the pandemic.

Important bill messages have been added informing customers to contact the customer service department if they need help paying their water bill through payment plans or assistance options. A bill insert was also utilized to promote the SUEZ Cares Program, which provides grants up to \$150 for customers who are experiencing financial hardships. The grant would not exceed the customer's current water balance. Alternative payment plans were available where the company would establish a new payment plan or renegotiate the current payment plan they may have previously established.

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?

As further described below, once the Commission’s Emergency Order on Terminations at Docket No. M-2020-3019244 ends, SUEZ will not schedule terminations for a minimum of one month from the termination of the said Docket. Once the emergency order is lifted, SUEZ will utilize the 30 days to work with customers to set up payment plans and remind customers of the SUEZ Cares Grant Program.

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

SUEZ will gradually restart the termination process with new notices for all customers that meet the termination criteria. However, prior to starting the termination process, SUEZ is in the process of developing an important notice that will be mailed out to customers reminding them that to date, no payment has been received. This notice advises customers to contact customer service if assistance is needed for paying their water bill. The company will also thank those who may have sent payment and their payment has not yet reached the office. If payment is still not made, SUEZ has developed an automated call (Televox) as another reminder if payment has not reached the company after the company has sent the important notice.

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?

SUEZ has evaluated its customer accounts. Upon review, SUEZ estimates a total of 4,924 customer accounts that would be eligible for termination, which compares to 5,735 total accounts eligible in June 2019. These numbers indicate those that are able to pay continue to pay their water bill. For non-residential customers that have either closed or suspended business, their bills are typically less and may only represent the service charge which may explain why their numbers have not varied. While the number of residential customers has decreased slightly when compared to 2019, the more important number is the dollar amount that has accumulated in the various accounts receivable buckets. SUEZ has seen a \$156,480 increase in the total of the 31

to 120 days receivable accounts, nearly a 50 percent increase. This is an indication that a set number of customers have not paid their bill in the past two to three months. See Table 2.

Table 1 Number of customers due for termination

Based on a \$40.00 past due amount

May 2019 compared to May 2020

	2019 Termination Notifications by Class		2020 Estimated Terminations by Class
Residential	5,246		4,493
Commercial	451		388
Industrial	7		10
PBA	31		33

Table 2 Accounts Receivables

May 2019 compared to May 2020

Item	Current Balance (31-60)	Current Balance (61-90)	Current Balance (91-120)
2019	\$ 211,654	\$ 77,780	\$ 32,563
2020	\$ 226,467	\$ 142,233	\$ 109,778
2020 less 2019	\$ 14,812	\$ 64,453	\$ 77,215
Percentage 2020 vs 2019	7%	83%	237%

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

SUEZ does not have a CAP program, but SUEZ does offer SUEZ Cares for customers that have an inability to pay their bills. Through SUEZ Cares, customers can seek one grant per year. Since the pandemic has begun in March, the company found that there is a minimal amount of customers that have contacted the company to apply for a payment arrangement and a handful of customers that have applied for a SUEZ Cares grant that are having difficulties with paying their water bill. In 2019, there were 64 customers that received grants totaling \$6,171.00. As of

March 2020 when the pandemic started, there were only two customers that had applied for a SUEZ Cares grant.

Provide future projections if available.

SUEZ does not have a CAP Program so future projections are not applicable.

Is the utility currently assessing a “reconnection fee” to restore service?

Prior to the Commissions Emergency Order, SUEZ billed a reconnection fee in the amount of \$50.00 per its tariff.

If yes, how is the fee billed and/or collected?

Prior to the Commissions Emergency Order, SUEZ collected fees prior to reconnecting the service.

Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

No, SUEZ did not charge or bill the customers a reconnection fee during the Commission’s Emergency Order. SUEZ reconnected all customers that were previously shut off for non-payment without requiring a fee for the health and safety of all customers.

Universal Service Programs:

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

The CAP program does not pertain to SUEZ.

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?

SUEZ has a hardship fund that requires customers to make a good faith payment of at least \$25.00 within the last 90 days. As a result of the pandemic, SUEZ is considering waiving

the 90 day requirement and requiring that qualifying customers have made at least one payment in the 2020 calendar year.

Other Assistance Initiatives:

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

SUEZ has waived late fees during the COVID-19 pandemic. In addition, SUEZ is also willing to re-negotiate payment plans during this pandemic. The company will continue to follow the guidelines set forth for re-negotiation based on the change of income provisions, medical and PFA's found in Chapters 14 & 56; however, in addition to the outlined provisions the company will further re-negotiate once the COVID-19 Disaster Relief has been lifted. These re-negotiations will continue at least one month after the emergency order has been lifted.

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. Utilities are directed to report this information to Sarah Dewey, sdewey@pa.gov in the Commission's Bureau of Consumer Services (BCS), detailing the efforts already in place and thereafter when further changes by the utilities are implemented.

SUEZ proposes to make a temporary change to the SUEZ Cares Program. The current program requires a customer to make a payment of \$25 within the last 90 days. SUEZ is willing to accept a payment of at least \$25.00 within the 2020 calendar year; lengthening the 90-day window. The company will continue to provide outreach and education to encourage customers to take advantage of the program and to also set up payment arrangements to avoid a higher-than-normal outstanding balance. SUEZ anticipates that many customers will utilize these options available once the emergency order is lifted. Unfortunately, not many customers have as yet contacted the company to set up payment arrangements nor are they taking advantages of the SUEZ Cares Program that is available to assist them with their bill.

SUEZ has shared various updates with its customers by utilizing tools such as the press releases on the company website and promotions via Twitter and Facebook. In addition, various

letters, bill messages and a bill onsert have been utilized as a form of outreach and education. This format will continue to be used to provide education and awareness to any changes that SUEZ plans to make to its programs. In addition, the company has developed an additional Important Notice that will be mailed later this month followed by a Televox call bringing further attention to the Important Notice to encourage customers to contact the company for assistance on their bill.

II. Consumer Education and Outreach

The Commission is specifically interested in how utilities are informing customers of their rights and responsibilities as ratepayers during the COVID-19 pandemic and in determining whether any gaps exist in consumer education and outreach efforts. The Commission directs all jurisdictional electric, natural gas, water, wastewater, and telecommunications utilities to submit to Tom Charles, thcharles@pa.gov, in the Commission's Office of Communications, the following information, if applicable, regarding consumer education and outreach strategies related to the COVID-19 pandemic and the ensuing recovery period.

Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.

SUEZ created a COVID-19 landing page that emphasizes keeping customers and employees safe throughout the pandemic.

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attention to the Important Notice to encourage customers to contact the company for assistance on their bill.

With regards to conservation, SUEZ has a conservation survey on its website that can be taken by customers to assist them in making better choices when utilizing their water consumption. In addition, there are indoor water tips as well as higher impact conservation tips. Frequently asked questions are also available to assist customers in identifying leaks based on higher-than-normal bills.

Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.

SUEZ has a group of trained, experienced Customer Service Representatives that work with customers that are experiencing personal hardships. The representatives negotiate reasonable payment arrangements and refer customers to apply for a SUEZ Cares grant. The SUEZ website has collection frequently asked questions that direct customers to the customer service team for assistance. In addition, customers can simply electronically utilize the “contact us” link to email the customer service department for questions and concerns they may have regarding the programs. SUEZ has also placed bill messages on our bills, sent onsert notifications and plans to provide an important notice and Televox call for further outreach and education to our customers. It should be noted that SUEZ has not only stopped all terminations, but also stopped assessing penalties to all of customers that are behind in paying their bills. Below are various links to emphasize the outreach made along with the importance of sharing the company’s protections of both its customers and employees during COVID-19.

- <https://www.mySUEZwater.com/pennsylvania/news/SUEZ-waive-late-fees-customers-during-covid-19-health-crisis-2>
- <https://www.mySUEZwater.com/pennsylvania/news/our-commitment-customers>
- <https://www.mySUEZwater.com/pennsylvania/news/SUEZ-reminds-residents-scrutinize-identification-of-all-utility-workers-during-covid-19-health-crisis>

- <https://www.mySUEZwater.com/pennsylvania/news/your-rights-and-responsibilities-utility-consumer>
- <https://www.mySUEZwater.com/sites/default/files/Reopeningyourbusinessfinal.pdf>

Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.

In February 2020, SUEZ provided a bill insert to all of its customers notifying them of the Customer Know Your Rights information booklets. SUEZ maintains this information on its website at <https://www.mySUEZwater.com/pennsylvania/support-center/customer-rights>. In addition, SUEZ has various avenues that will be utilized to make sure consumer's voices are heard. Social Media Campaigns on Facebook and Twitter, customer notifications by both phone and text, bill messages and inserts, important notices, utilization of Borough or Township websites, utilization of mysuezwater.com (by zip code when applicable) and customer and company feedback by use of Microsoft Teams.

In addition, SUEZ Customer Service Representatives are available Monday thru Friday from the hours of 8:00 a.m. to 4:30 p.m. SUEZ also has an IVR (interactive voice response system) available 24/7 along with a "contact us" section on the company website where customers can interact with its team via email. In addition, there is a Customer Service section on the website that highlights Customer Complaints and Resolutions, Customer Rights, Conservation information along with a conservation survey, Collections and various frequently asked questions in each of the areas cited. This information can be attained 24/7 by utilizing mysuezwater.com.

Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service.

SUEZ continues to utilize the company's website landing page for important COVID-19 changes. In addition, there has been a video shared by the company's CEO and SUEZ has utilized social media outlets such as Facebook and Twitter. Customers will continue to be

notified by bill messages, onserts and there are plans to mail an Important Notice and automated telephone calls (Televox) to our customers to keep them informed.

If programs have been modified due to the pandemic, please provide current customer education tools and advertising so that the Commission's own customer education efforts are based on current utility programs and practices.

This Secretarial Letter shall be served upon all electric, natural gas, water, wastewater, and telecommunications utilities under the Commission's jurisdiction. All jurisdictional electric, natural gas, water, wastewater, and telecommunications utilities are directed to provide the requested information within 10 calendar days of the issuance of this Secretarial Letter. All responses to the Secretarial Letter should be directed to the Secretary and made by efileing through the Commission's efileing system noting the docket number. If your response contains confidential or proprietary information, you may email your filing directly to Secretary Chiavetta at rchiavetta@pa.gov . As directed, responses pertaining to certain data requests should also be sent to Sarah Dewey of the Bureau of Consumer Services and Tom Charles, Director of Communications, respectively.

If you have any questions in this matter, please contact Renardo L. Hicks, Chief Counsel, at rehicks@pa.gov, or John Herzog, Executive Deputy Chief Counsel, at jherzog@pa.gov.

Sincerely

A handwritten signature in black ink that reads "Rosemary Chiavetta". The signature is written in a cursive style with a large initial "R".

Rosemary Chiavetta
Secretary