



Via Electronic Filing and Electronic Mail

August 18, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105

Re: **Emergency Order-PUC Docket No M-2020-3019244**

Dear Secretary Chiavetta:

Enclosed please find Aqua Pennsylvania, Inc.'s (Aqua) comments to Chairman Dutrieuille's August 10th letter in the above docket seeking comments regarding the ongoing termination moratorium and customer protections for at-risk customer in the event the termination moratorium is lifted.

Sincerely,

Mary McFall Hopper

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**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Emergency Order

Docket No. M-2020-3019244

COMMENTS OF AQUA PENNSYLVANIA, INC.

Aqua Pennsylvania, Inc. (“Aqua” or the “Company”) respectfully submits the following comments to Chairman Dutrieuille’s August 10, 2020 letter (Commission Letter) issued in the above docket seeking comments regarding the lifting of the termination moratorium in effect pursuant to the Commission’s March 13, 2020 Emergency Order. On June 8, 2020, the Company submitted comments in response to the Commission’s Request for Utility Information relating to COVID-19 Customer Service, Billing and Public Outreach Provisions at Docket M-2020-3020055. The Company’s Comments are a supplement to its June 8th filing and addresses the issues raised by the Commission Letter.

The Company agrees with Chairman Dutrieuille that it is the appropriate time to review whether to continue a total prohibition on termination of utility service. While the Commonwealth is still under COVID restrictions, some restrictions have been removed including the lifting of the shelter-in-place orders and permitting businesses to reopen. As noted by Chairman Dutrieuille, the prohibition of termination of utility service is leading to the accumulation of arrearages for a large number of utility customers and the continuation of the moratorium could further increase the difficulty customers will have in paying these balances.

Aqua is communicating with its customers in a number of ways during this time period to alert them of their accumulating balances and let them know that assistance is available to help

pay their bills. The Company has used a number of different approaches to communicate with its customers, including mailing payment reminder letters, sending email communications, leaving door hangers, communicating on social media channels, sending Helping Hand information in bill inserts and proactively making telephone calls. The Company agrees that it is extremely important to encourage its customers to contact the Company to discuss their account, determine the best way to handle paying their Aqua bill and provide help either with enrollment in Helping Hand, application of an assistance grant or setting up a payment arrangement. During the termination moratorium, the Company has been reviewing its customer communications to determine their effectiveness and to evaluate new and different ways to reach its customers.

The Company also believes that it is important for the Commission to set a date for the expiration of the termination moratorium to enable it to update its communication and outreach to customers. The Company and its customers will benefit from advanced notice so they might contact the Company to avoid termination of service. While the Company has made extensive efforts to communicate to customers the importance of addressing their utility bills during the termination moratorium, a defined end date will permit both the Customer and the Company sufficient time to prepare for resuming normal collection activity.

The Company supports the Commission's goal of ensuring there are appropriate customer protections in place when the termination moratorium is lifted. The Commission's existing regulations provide for such protections, requiring that all collection notices include information alerting the customer that assistance is available and that the customer has the option of contacting the Commission to file a dispute. In addition, and as described in the Company's June 8th Comments, the Company has modified and enhanced its low-income assistance program, Helping Hand. The Company also has a grant component to its Helping Hand program

that allows it to assist accounts that are not eligible for the traditional Helping Hand program. The Company plans to continue this expanded assistance when the termination moratorium is lifted and while the COVID crisis is still pending.

The Company requests that the Commission provide utilities with a date certain when notices can be sent to customers and a date certain when the prohibition on termination of utility service will be lifted. In addition to the updated communication to the customer, this will allow the Company to ensure that its call centers are prepared to assist customers and set up payment arrangements or enrollment in Helping Hand so that customers can avoid termination of service.

Aqua appreciates the opportunity to comment on the Commission Letter. Aqua commits to working with the Commission to ensure that there are sufficient consumer protections and assistance available to customers upon the lifting of the prohibition on termination of public utility service.

Respectfully submitted,

Mary McFall Hopper

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Dated: August 18, 2020