

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION


DIRECT TESTIMONY OF

JULIE QUIGLEY

ON BEHALF OF
THE PITTSBURGH WATER
AND SEWER AUTHORITY


Docket Nos.
R-2020-3017951 (Water)
R-2020-3017970 (Wastewater)

TOPICS:


Customer-Facing Response to COVID-19 and Impact on
Collections
Water and Wastewater Tariff Revisions

May 15, 2020

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1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND CURRENT POSITION WITH PWSA.**

3 A. My name is Julie A. Quigley. My position with The Pittsburgh Water and Sewer
4 Authority (“PWSA” or “Authority”) is Director of Administration.

5 **Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THIS PROCEEDING?**

6 A. Yes, I submitted Direct Testimony on March 6, 2020, which accompanied the rate filing
7 package.

8 **Q. WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT TESTIMONY?**

9 A. The purpose of my testimony is to: [REDACTED]
10 [REDACTED] provide information about PWSA’s customer-facing
11 response to COVID-19 as well as the impact on PWSA’s collections; and, [REDACTED] explain the
12 current status of PWSA’s Water and Wastewater Tariffs, including the process for
13 making changes based on the revised proposals detailed through PWSA’s Supplemental
14 Direct Testimony.

15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]

¹ See Table 6 on page 12 of my Direct Testimony.

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	2021 Proposed	Monthly Impact Proposed \$	Monthly Impact Proposed %
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14

1 [REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 **III. CUSTOMER-FACING RESPONSE TO COVID-19 AND IMPACT ON**

15 **COLLECTIONS**

16 **Q. PLEASE EXPLAIN WHAT ACTIONS PWSA HAS TAKEN IN RESPONSE TO**

17 **COVID-19 REGARDING CUSTOMERS.**

18 A. On March 13, 2020, PWSA: (1) Extended the Winter Moratorium through May 31,

19 2020; (2) waived the income eligibility requirements for the Winter Moratorium through

1 May 31, 2020; and, (3) restored serve at the request of any customer still residing in an
2 affected property. Consistent with the Commission's March 13, 2020 Emergency Order,
3 PWSA has ceased all terminations through June 6, 2020. On April 24, 2020, PWSA: (1)
4 Further extended the Winter Moratorium through July 1, 2020; (2) waived the income
5 eligibility requirements for the Winter Moratorium through July 1, 2020; (3) waived the
6 Bill Discount annual recertification requirement through December 31, 2020; and, (4)
7 waived the Hardship Grant program sincere effort of payment requirement through
8 December 31, 2020.

9 **Q. IS PWSA CONTINUING TO PROVIDE CUSTOMER SERVICE DURING THE**
10 **CURRENT PANDEMIC EMERGENCY?**

11 A. Yes. All of PWSA's Customer Service Representatives are continuing to answer
12 consumer calls from home. The daily call volume, however, has dropped by 49%
13 between March 16, 2020 and the end of April. Therefore, PWSA has tasked Customer
14 Service Representatives with proactively reaching out to affected accounts during this
15 time to alleviate some of the anticipated increase in call volumes after July 1, 2020 as
16 PWSA's extended Winter Moratorium ends.

17 **Q. WHAT HAS BEEN THE FINANCIAL IMPACT TO PWSA OF THESE COVID-**
18 **19 RESPONSE ACTIVITIES?**

19 A. Between March 16, 2020 and the end of April, PWSA has experienced a 15% reduction
20 in monthly collection of billed charges. Payment arrangements have decreased by 2%
21 due to default. Seventy-three new customers have been enrolled in the Bill Discount
22 Program.

1 **Q. WHAT STEPS DOES PWSA PLAN TO TAKE AS JULY 1, 2020 APPROACHES**
2 **AND COLLECTION ACTIVITIES ARE ANTICIPATED TO BEGIN AGAIN?**

3 A. PWSA’s goal is to proactively reach as many affected customers as possible in advance
4 of July 1, 2020, so that their individual situations can be reasonably addressed. On this
5 topic, many good suggestions were offered during PWSA’s May 8, 2020 Low Income
6 Assistance Advisory Committee (“LIAAC”) meeting, which we are currently evaluating.
7 In addition to Customer Service Representatives proactively making Friendly Reminder
8 calls to customers with past due balances, PWSA is mailing Friendly Reminder letters to
9 all customers who would have received a termination notice in May and June. As we
10 move into June, PWSA will begin to send 37 day letters to property owners; however, no
11 anticipated termination date will precede July 1, 2020. We will continue to collect in
12 accordance with Commission regulations, including 30 day postings for tenant-occupied
13 properties, 10 day notices for all other residential and commercial customers, and 3 day
14 postings prior to termination. The same protections of medicals and PFA’s will be in
15 place, and of course our extended customer assistance programs will be available. Lastly,
16 all termination notices will continue to advise customers of their rights and ways to avoid
17 termination.

18 **IV. WATER AND WASTEWATER TARIFF REVISIONS**

19 **Q. PLEASE PROVIDE AN UPDATE REGARDING PWSA’S CURRENTLY**
20 **EFFECTIVE WATER AND WASTEWATER TARIFFS.**

21 A. The currently effective Commission approved water and wastewater tariffs were
22 approved as part of PWSA’s Initial Rate Case filing and became effective on March 1,
23 2019.

1 **Q. IS PWSA ANTICIPATING CHANGES TO THESE CURRENTLY EFFECTIVE**
2 **TARIFFS?**

3 A. Yes; as discussed in the Supplemental Testimony of Bob Weimar, PWSA filed Tariff
4 Supplement Number 3 to its Water and Wastewater Tariffs to address issues related to the
5 Stage 1 Compliance Plan proceeding. As directed by Commission Staff, we have
6 proposed a tariff effective date for Supplement Number 3 of June 27, 2020. Assuming
7 these supplements are approved, then Tariff Supplement Numbers 3 would supersede the
8 currently effective tariffs.

9 **Q. HAVE PWSA'S PROPOSED TARIFF SUPPLEMENT NUMBERS 2 BECOME**
10 **EFFECTIVE?**

11 A. No. PWSA Tariff Supplement Numbers 1 for both the Water and Wastewater Tariffs
12 incorporated PWSA's original rate case proposals and were included with my Direct
13 Testimony as PWSA Exhibits JAQ-1 through JAQ-4. As directed by the Commission's
14 April 16, 2020 Order, PWSA filed PWSA Tariff Supplement Number 2, suspending
15 Tariff Supplement Number 1 until December 5, 2020. As explained further in the
16 Supplemental Testimony of Bob Weimar, we anticipate filing another Tariff Supplement
17 to suspend the effective date of the rates consistent with the agreement reached regarding
18 I&E's Motion to Extend the Statutory Period.

19 **Q. IS PWSA SUBMITTING A PROPOSED TARIFF SUPPLEMENT TO**
20 **INCORPORATE PWSA'S REVISIONS DISCUSSED THROUGHOUT THE**
21 **DIRECT SUPPLEMENTAL TESTIMONY?**

22 A. [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED] PWSA

1 has drafted proposed tariff language related to PWSA's lead infrastructure plan as
2 discussed in the Supplemental Direct Testimony of Barry King. PWSA's proposed tariff
3 language regarding this issue is included as PWSA Exhibit BK-5 and BK-6 with Mr.
4 King's Supplemental Direct Testimony.

5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]

17 **V. CONCLUSION**

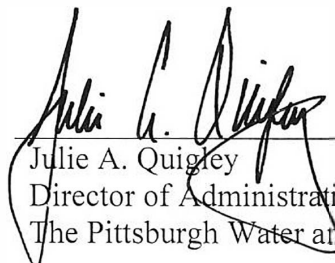
18 **Q. DOES THAT COMPLETE YOUR SUPPLEMENTAL DIRECT TESTIMONY?**

19 **A.** Yes; however, I do reserve the right to supplement this testimony as may be appropriate.

VERIFICATION

I, Julie Quigley, hereby state that: (1) I am the Director of Administration for The Pittsburgh Water and Sewer Authority (“PWSA”); (2) the facts set forth in my testimony are true and correct (or are true and correct to the best of my knowledge, information and belief); and, (3) I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: 5/15/20



Julie A. Quigley
Director of Administration
The Pittsburgh Water and Sewer Authority