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Via Electronic Filing

September 12, 2017

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17105-3265

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FEB 11 2019

Independent Regulatory
Review Commission

RE: ***Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56
to Comply with the Amended Provisions of 66 Pa.C.S. Chapter 14
Docket No. L-2015-2508421***

Dear Secretary Chiavetta:

Enclosed for filing please find the Additional Comments of Aqua Pennsylvania, Inc. in the above-referenced Rulemaking Order.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary McFall Hopper".

Mary McFall Hopper
Regulatory Counsel
(610) 645-1170
mmhopper@aquaamerica.com

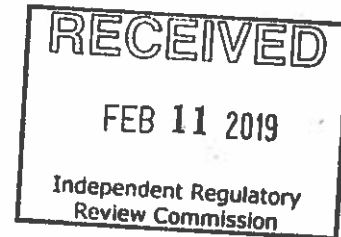
cc: Dan Mumford, PUC Office of Competitive Market Oversight
Matthew Hrivnak, PUC Bureau of Consumer Services
Patricia T. Wiedt, PUC Law Bureau

3161

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking to Amend the Provisions of
52 Pa. Code, Chapter 56 to Comply with the
Amended Provisions of 66 Pa.C.S. Chapter 14

: Docket No. L-2015-2508421



ADDITIONAL COMMENTS OF AQUA PENNSYLVANIA, INC.

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Rulemaking to Amend the Provisions of
52 Pa. Code, Chapter 56 to Comply with the
Amended Provisions of 66 Pa.C.S. Chapter 14

: Docket No. L-2015-2508421

**COMMENTS OF AQUA PENNSYLVANIA, INC.
TO THE ORDER SEEKING ADDITIONAL COMMENTS**

Aqua Pennsylvania, Inc. ("Aqua" or the "Company") respectfully files the following written comments to the Pennsylvania Public Utility Commission's ("Commission") Order Seeking Additional Comments to its Rulemaking to Amend the Provisions of 52 Pa. Code, Chapter 56 to Comply with the Amended Provisions of the Responsible Utility Customer Service Protection Act. ("Chapter 14"). 66 Pa.C.S. §§1401-1418.

I. INTRODUCTION

Aqua welcomes the opportunity to offer additional comments on the Commission's Rulemaking to amend Chapter 56, The Standards and Billing Practices for Utility Service (§§56.1-56.461), to comply with Act 155 of 2014 which reauthorized and amended Chapter 14 of the Public Utility Code. Aqua serves approximately 1.4 million customers in Pennsylvania through 31 counties. Aqua's wastewater subsidiary, Aqua Pennsylvania Wastewater, Inc., serves approximately 20,000 connections in Pennsylvania. Aqua's water and wastewater systems serve both rural and urban areas.

Aqua offers these comments in addition to those filed on April 19, 2017 in the above docket.

II. COMMENTS

1. Privacy Guidelines At 66 Pa. C.S. 1406(b)(1)(ii)(D)

Aqua agrees with the Commission that Privacy Guidelines are an important component of how it conducts business and interacts with its customers. There are numerous factors that should be considered when developing comprehensive and effective guidelines to allow customer sensitive information to remain confidential while balancing the needs of the utilities to operate, particularly with the continuing innovations in communications technologies.

Aqua agrees with the Commission's suggested approach to address this topic in a "separate, but related, proceeding" and to establish guidelines rather than regulations due to the speed in which issues can arise when dealing with electronic communications, customer consent and sharing of information.

2. Customer Retaining Utility Service Pending Formal Appeal

The Commission's Order for Additional Comments seeks to amend 52 Pa. Code §56.172(d) to clarify the automatic stay provisions of the Bureau of Consumer Services (BCS) informal complaint decision. As stated in the Order Seeking Additional Comments, the proposed change is to ensure, when appropriate, that the customer is able to maintain utility service while the issues being appealed from the BCS informal complaint decision remain in dispute.

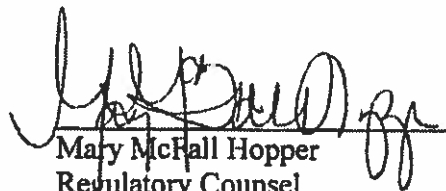
Aqua agrees that in the circumstances where a "customer receives a BCS informal decision with restoration terms and the customer pays according to the BCS informal decision, the utility must restore service" (Order, p. 13). Aqua submits that proposed amendment to Section 56.172(d) not impact the other regulatory requirements, particularly those found in 52 Pa. Code §56.174 (relating to ability to pay proceedings) and 52 Pa. Code §56.181 (Duties of

parties; disputing party's duty to pay undisputed portion of bills). Section 56.174 specifically states that when current bills are not at issue, "the customer shall be responsible for payment of current, undisputed bills pending issuance of a Final Commission order." Likewise, Section 56.181(1) and (2) requires the disputing party to pay the portion of the bill which is not disputed.

III. CONCLUSION

Aqua appreciates the opportunity to submit additional comments on the Commission's Rulemaking and asks that the Commission consider its comments. Aqua looks forward to continuing to work with the Commission on these issues. Please direct any questions with regard to these comments to the undersigned.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Mary McFall Hopper", written over a horizontal line.

Mary McFall Hopper
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Dated: September 12, 2017