

January 12, 2023

**VIA ELECTRONIC MAIL**

Carmen D. Diaz  
Acting Secretary of the Board  
New Jersey Board of Public Utilities  
44 South Clinton Avenue  
P.O. Box 350  
Trenton, NJ 08625

**Re: In the Matter of the New Jersey Board of Public Utilities' Response to the  
COVID-19 Pandemic  
BPU Docket No. AO20060471**

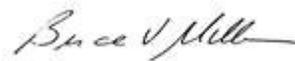
Dear Acting Secretary Diaz:

This submission is respectfully made on behalf of New Jersey-American Water Company, Inc. ("NJAWC" or "Company") in compliance with the New Jersey Board of Public Utilities' ("BPU") December 21, 2022, Order ("December 21 Order"), which became effective December 28, 2022. The December 21 Order authorized an extension of the regulatory asset period established in this proceeding from December 31, 2022, to March 15, 2023. It also required "utility companies regulated by the Board to file a formal plan within 15 days from the effective date of ...[the] Order<sup>1</sup> outlining how the additional time afforded by ...[the] Order will be used to obtain appropriate federal funds and to work with customers to reduce arrearages and avoid disconnection."<sup>2</sup> This submission complies with the directive in the December 21 Order to submit such a plan by January 12, 2023.

In accordance with the March 19, 2020, and May 20, 2020, BPU Orders issued in BPU Docket No. EO20030254, hard copies are not being provided at this time, but can be submitted at a later time, if needed.

Please direct any inquiries to the undersigned. Thank you for your attention to this matter.

Very truly yours,



Bruce V. Miller

cc: Service list (via email)

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<sup>1</sup> Fifteen days from the effective date of December 28, 2022 is January 12, 2023.

<sup>2</sup> December 21 Order at 8.

## Attachment A

### **In the Matter of the New Jersey Board of Public Utilities' Response to the COVID-19 Pandemic BPU Docket No. AO20060471**

#### **New Jersey-American Water Company, Inc.**

#### **January 12, 2023 Plan**

#### **A. How New Jersey-American Water Will Use the Additional Time<sup>3</sup> to Obtain Appropriate Federal Funds**

New Jersey-American Water Company, Inc. (“NJAWC” or the “Company”) has actively participated in the Division of Consumer Affairs' (“DCA”) efforts to appropriate federal Low Income Household Water Assistance Program (“LIHWAP”) funds in collaboration with BPU Staff and other key stakeholders. In addition to providing feedback to the LIHWAP plan and proposed vendor agreement, the Company has begun applying LIHWAP funding to help pay down eligible customer arrearages as funds have become available. The Company continues to work diligently with DCA and promptly respond to any DCA requests to help drive timely access to funds and their application to customer accounts as quickly as possible.

#### **B. How New Jersey-American Water Will Work with Customers to Reduce Arrearages and Avoid Disconnections**

As noted above, the Company is applying LIHWAP, to the extent available, to help pay down arrearages for eligible customers. NJAWC also follows a number of practices to assist customers with bill payment. In addition to delivering water and wastewater services in the most efficient, cost-effective manner to benefit its customers, NJAWC offers several targeted customer assistance programs to help its most vulnerable customers:

- The Company continues to offer and promote its H2O Help to Others Program, which provides bill paying assistance to customers in need.<sup>4</sup>
  - The grant component is an emergency bill-paying assistance program funded by NJAWC’s shareholders and donations from customers who want to help other customers in need. Customers who qualify may receive grants of up to \$500 toward their NJAWC bill.
  - The service charge discount component, funded through rates, provides customers who qualify up to a 100 percent discount on their monthly fixed service charge for water and is also available for the same NJAWC wastewater customers. Eligible

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<sup>3</sup> Additional time refers to the period associated with the extension of the regulatory asset period from December 31, 2022 to March 15, 2023 authorized by the New Jersey Board of Public Utilities in this proceeding.

<sup>4</sup> In 2017, NJAWC expanded the income limits from 200% to 300% of the poverty level, and in 2019, NJAWC increased the length of time applicants are given to provide documentation to New Jersey SHARES, from three days to 10 days.

customers who also receive Social Security benefits or Medicare coverage are also eligible to receive a discount off the monthly DSIC and WSIC surcharges, which are based on meter size or meter equivalent.

- The Company will continue to offer deferred payment arrangements (“DPAs”) to its residential and commercial customers.
  - The Company is working with residential customers to establish manageable DPAs, initially offering DPAs of at least 12 months while maintaining flexibility in terms.
  - Commercial customers are offered DPAs up to 12 months.
- Budget billing plans are available as an option for eligible residential customers, whereby the total service for the succeeding 12-month period is estimated in advance, and bills are rendered monthly based on one-twelfth (1/12) of the 12-month estimate.

The Company also has a robust communications plan. Information regarding bill payment assistance programs is maintained on the Company’s website and regularly communicated to customers, including information regarding other utility assistance programs in the state. Throughout the COVID-19 pandemic, the Company enhanced its communication of its assistance programs through additional digital and social media, press releases and bill inserts and plans to continue to do so. A few examples include:

- November 2020 – NJAWC partnered with New Jersey SHARES to host a live virtual workshop to assist customers with awareness and completing the applications for the H2O Program,<sup>5</sup> which was recorded and posted to NJAWC’s website.
- May 2021 – NJAWC leveraged Utility Assistance Week with a social and digital media campaign in English and Spanish, a customer email campaign, which included links to a fact sheet in [English](#) and [Spanish](#), and a press release.
  - NJAWC also introduced a free conservation kit as an additional incentive for customers who enroll in H2O Help to Others program.
- Notice of the Revised Customer Bill of Rights
  - Mailed to all residential customers during the week of September 20, 2021.
  - Included in all future monthly bills to residential customers beginning in October 2021
  - Posted on the NJAWC website (available in multiple languages)
  - Distribution of the Customer Bill of Rights in all customer bills will continue for the duration of 2023
- Additional communication regarding bill paying assistance options and H2O Help to Others Program
  - Emails to customers in October 2021 and October 2022
  - Bill message on all customer October 2021 and October 2022 bills
  - Bill insert in November 2021 and October 2022
  - Earned, digital and social media campaign that included a press release, media posts and ads targeted to our lower-income service areas and customers in November 2021 and November 2022

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<sup>5</sup> Representatives from NJAWC and New Jersey SHARES provided an overview of the programs and benefits, explained eligibility requirements, and answered live questions from viewers.

- Additional virtual workshops with New Jersey SHARES in November 2021 and 2022.
- Participation in several bill paying assistance community information fairs with other utility providers and assistance agencies in fall 2022. NJAWC will continue to implement this robust communications plan in 2023, which includes bill messaging and inserts, email campaigns, a fall virtual workshop, and participation in several bill paying assistance community information fairs with other utilities. A new addition in 2023 will be to amplify this customer benefit online for those who are searching for support.
- New Jersey 2-1-1 informational posters are available at all NJAWC operating districts so that employees are aware of and communicate about the program to customers. NJAWC's field service representative and transmission and distribution employees have business cards in English and Spanish on hand in the field to share with customers as well.
- Once the Company received confirmation of LIHWAP funding, NJAWC promoted that program through a variety of platforms, including bill messaging, customer emails, NJAWC's website, social media, messaging on our Interactive Voice Response ("IVR") phone system and training of our customer service representatives to keep them up to date on the availability of assistance programs.

Following the termination of the grace period provided for in Executive Order No. 246, the Company implemented an enhanced disconnection notice process for residential customers. All residential customers overdue 30 days or greater received two separate staggered letters informing them that the Company planned to resume dunning procedures and advising them of their options prior to the issuance of a formal disconnection notice. In addition, the Company is providing Winter Termination Program fact sheets<sup>6</sup> to all customers receiving disconnection notices and holds are placed on eligible customers' accounts to protect them from disconnection through March 15.

The Company will continue to collaborate with interested parties and evaluate other potential opportunities for education, outreach and other activities to work with customers to help pay down arrearages.

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<sup>6</sup> The fact sheet was submitted to the BPU for approval prior to the October 1 deadline, and subsequently approved with a few modifications on October 6, 2022.