

October 1, 2021

VIA ELECTRONIC FILING

Honorable Aida Camacho-Welch
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 Secretary Camacho-Welch:

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”) September 14, 2021 Order (“September 14 Order”), which became effective September 21, 2021. The September 14 Order authorized an extension of the regulatory asset period established in this proceeding from September 30, 2021 to December 31, 2022. It also required “utility companies regulated by the Board to file a formal plan within 10 days from the effective date of ...[the] Order¹ outlining how the additional time afforded by ...[the] Order will be used in meeting the [r]egulatory [a]sset [p]eriod deadline.”² This submission complies with the directive in the September 14 Order to submit such a plan by October 1, 2021.

While the September 14 Order does not specify the information that should be included in the formal plan, it does reference the “Comments of the New Jersey Division of Rate Counsel” dated August 4, 2021 submitted in this proceeding (“Rate Counsel Comments”) when ordering utilities to file a formal plan. In its Comments, Rate Counsel recommended that any approval of the extension of the regulatory asset period require “...the formal filing of a plan on how the additional time will be used by the Companies.”³ Specifically, the Rate Counsel Comments recommended that the utilities be required to “...file a plan setting forth how it will use the additional time to obtain appropriate federal funds and work with customers to reduce arrearages and avoid disconnections....”⁴ Attachment A included with this submission contains NJAWC’s Plan to address these issues.

¹ Ten days from the effective date of September 21, 2021 is October 1, 2021.

² September 14 Order at 6.

³ *Id.* at 5.

⁴ Rate Counsel Comments, PDF page 9 of 19.

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.

Respectfully submitted,



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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.

October 1, 2021 Plan

A. How New Jersey-American Water Will Use the Additional Time¹ to Obtain Appropriate Federal Funds

New Jersey-American Water Company, Inc. ("NJAWC" or the "Company") has actively participated in the Division of Consumer Affairs' efforts to appropriate federal Low Income Household Water Assistance Program ("LIHWAP") funds in collaboration with BPU Staff and other key stakeholders. This includes providing feedback to the LIHWAP plan and proposed vendor agreement. The Company intends to apply LIHWAP funding to help pay down eligible customer arrearages once funds become available.

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

As noted above, the Company plans to apply 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.²
 - 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 customers who also receive Social Security benefits or Medicare coverage are also

¹ Additional time refers to the period associated with the extension of the regulatory asset period from September 30, 2021 to December 31, 2022 authorized by the New Jersey Board of Public Utilities in this proceeding.

² 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. Most recently, the Company temporarily waived certain eligibility requirements to further enhance access to the program, including requiring a customer contribution and the restriction of receiving a grant only once every three years.

eligible to receive a discount off the monthly DSIC surcharge, which is based on meter size.

- 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 on the basis of 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,³ 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 October⁴
 - Posted on the NJAWC website (available in English and Spanish)
- Fall 2021 – additional communication regarding bill paying assistance options and H2O Help to Others Program
 - Emails to customers in October 2021
 - Bill message on all customer October 2021 bills
 - Bill insert in November 2021
 - Earned, digital and social media campaign that will include a press release, media posts and ads targeted to our lower-income service areas and customers in November 2021
 - Second virtual workshop with New Jersey SHARES in November 2021
- 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

³ Representatives from NJAWC and New Jersey SHARES provided an overview of the programs and benefits, explained eligibility requirements, and answered live questions from viewers.

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 receives confirmation of LIHWAP funding, NJAWC also plans to promote that program through a variety of platforms, including bill messaging, 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.

In anticipation of the termination of the grace period provided for in Executive Order No. 246, the Company is implementing an enhanced disconnection notice process for residential customers. All residential customers overdue 30 days or greater will receive two separate staggered letters informing them that the Company plans to resume dunning procedures and advising them of their options prior to the issuance of a formal disconnection notice.

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.

**IN THE MATTER OF THE NEW JERSEY BOARD OF PUBLIC UTILITIES' RESPONSE TO
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