






COMMISSION SUMMARY

AGENDA CATEGORY: Other Reports

ITEM NUMBER: 3. Customer Service

DATE: December 20, 2017

SUBJECT	Briefing on Proposed Changes to Standard Procedure: Adjustments and Corrections of Water/Sewer Bills
SUMMARY	The purpose for this agenda item is to brief the Commissioners on a preview of proposed changes to the Adjustment and Correction of Water/Sewer Bills Standard Procedure.
SPECIAL COMMENTS	We will request approval of the recommended changes to the Adjustments and Correction of Water/Sewer Bill regulation at the January 17, 2018 Commission Meeting. If approved, and after complying with the mandatory 30-day publication required by law, the regulation will be effective on March 1, 2018.
CONTRACT NO./ REFERENCE NO.	N/A
COSTS	N/A
AMENDMENT/ CHANGE ORDER NO. AMOUNT	N/A
MBE PARTICIPATION	N/A
PRIOR STAFF/ COMMITTEE REVIEW	Carla A. Reid, General Manager/CEO 
PRIOR STAFF/ COMMITTEE APPROVALS	Monica Johnson, Deputy General Manager, Strategic Partnerships  Crystal Knight-Lee, Director, Customer Service Department 
RECOMMENDATION TO COMMISSION	Official recommendations will be presented at January 17, 2018 Commission Meeting
COMMISSION ACTION	



Interoffice Memorandum

TO: COMMISSIONERS

THRU: CARLA A. REID
General Manager/Chief Executive Officer 

MONICA J. JOHNSON, DEPUTY GENERAL MANAGER
Strategic Partnerships Branch 

FROM: CRYSTAL KNIGHT-LEE, DIRECTOR 
Customer Service Department

DATE: December 8, 2017

SUBJECT: **CUSTOMER SERVICE: ADJUSTMENTS AND CORRECTIONS
REGULATION**

The purpose for this briefing is to provide Commissioners with a preview of proposed changes to the Commission regulation that addresses "*Adjustment and Correction of Water/Sewer Bills*" which is currently set forth at Standard Procedure CUS 10-10. The updated Commission regulation will be presented at the January 17, 2018 Commission Meeting for your approval.

Background

In support of the Commission's strategic priority for improving the customer experience, the Customer Service Department is working on a comprehensive strategy focused on people, process, and technology improvements that result in a more effective organization in service to our customers. Customer service policies are a significant driver of customer satisfaction and we recognize that eventually all customer service policies will need to be reviewed and updated.

We are prioritizing a number of policies that need to be modernized and made current. We will be examining what is most important for achieving our objective of becoming a customer-centric organization and will be coming back to you for approval of other policies.

High bills are one of the top reasons why customers contact the Commission and complain. As we review our policies, we are also looking at ways to minimize customer complaints in a fair and fiscally-responsible manner.

Further, as we transition to a new billing system (C2M) we expect additional changes as we anticipate incorporating some of the innovative processes of the new C2M billing system into our billing practices. Thus, this policy, as well as others, will be reviewed again in the months leading up to the implementation of C2M.

Adjustment and Correction of Water/Sewer Bills Regulation Overview

The Adjustment and Correction of Water/Sewer Bills regulation sets forth WSSC's policy for adjusting and correcting water/sewer bills. The regulation, which was last updated on May 19, 2010, outlines over 12 different situations for which an adjustment may be warranted. Those include:

High Bill Adjustment	Charitable Institutions
Leak On-Property	Credits for Customers with Physical or Mental Impairment
Underground Leaks, Off Property	Discolored Water or Sod Restoration
Delayed Collection Action	Illegal Consumption

The policy also outlines different types of scenarios in which the Commission will correct bills that have been rendered incorrectly. Those scenarios include:

Theft of Service	Incorrect Service
Over-registering Meter	Under-registering Sub-Meter

Justification for Changes and Snapshot of Billing Statistics

We recognize that leaks on-property can be common, especially among homes with aging infrastructure and consequently some customers will experience unexpected high bills. As such, we are taking action to review our policies and address a number of concerns and complaints that we often receive from customers.

As you may know, Senators Jim Rosapepe and Paul Pinsky, submitted legislation during the 2017 General Assembly session on behalf of their constituents in an effort to ensure homeowners are notified and sufficiently relieved of the high costs experienced due to water leaks.

Specifically, their constituents and other customers across our service area have expressed concerns such as:

- Customers having the burden of financial responsibility for excess charges associated with an on-property leak, unknowingly, especially not until after receipt of the bill; and
- High-bill adjustments for on-property leaks that are too infrequent (once every seven years).

Members of our senior leadership team met with the Senators several times to discuss options in lieu of legislation. As a result of those discussions, we are recommending changes to our policy.

Summary of Changes to Adjustment and Correction of Water/Sewer Bills SP

Outlined below is a summary of the changes to the regulation. These include advantages to our customers as well as the necessary updates to help bring the document current.

1. High Bill Adjustment - Residential customers will be able to request an adjustment to their water bill once every 3 years instead of once every 7 years. This is a positive change for our residential customers (Sec. 3.0, page 2). There is an adjustment policy for single-unit commercial properties which remains unchanged at this time.
2. Leaks On-Property - Residential and commercial customers will receive a credit for up to six months of excess water and sewer charges for on-property, underground leaks, including leaks on a secondary water line. This is a positive change for our customers (Sec. 3.2, page 2). Under the current regulation, customers receive credit for sewer charges only if the leak is on a secondary underground line.

In addition to those recommendations, summarized below are the recommended updates to make the policy current:

3. Current ADC - Clarified definition of current Average Daily Consumption (ADC) to reflect sufficient time (minimum of 10 days) for a meter reading to stabilize following a repair (Sec. 2.2, page 1);
4. Over-registering Meter - Clarified definitions based on AWWA standards for over and under-registering meters (Sec. 2.5 & 2.8; page 2);

5. High Bill Adjustment Budget - Removed outdated language from the policy that conditioned that availability of this adjustment on sufficient funds in the budget. The practice of separately budgeting funds specifically for the High Bill Adjustment has not been practiced for several years (page 2);
6. High Bill Adjustment Single-Unit Residential Properties – In addition to changing the eligibility to once every three years, added clarifying language to make it clear that customers are only eligible for one type of adjustment, generally the adjustment most beneficial to the customer (Sec. 3.0, page 2). This is to clarify that customers may not stack adjustments;
7. Leaks On-Property - Combined two sections describing Leaks On-Property – underground secondary line and underground leak on main water line – into one section that is streamlined and provides customers with credit for up to six months of water and sewer use charges for underground leaks on main water line and secondary line (New Sec 3.2, page 2);
8. Leaks On-Property - Removed the guidance concerning how and when leaks should be repaired to focus this SP primarily on adjustments and corrections. The Customer Service Department will work together with Utility Services and the General Counsel's Office to create a separate, stand-alone SP addressing the repairs and notification process for leaks (Former Sec 3.2, page 2);
9. Bankruptcy Denied - Removed section that describes the process for how to adjust charges should a bankruptcy be denied. Process language will be included in an internal operating procedure (Former Sec. 3.12).
10. Approval of Bill Adjustments and Corrections
 - a. Updated position titles to reflect current Department owner to Customer Service Director from Customer Care Team Chief (Sec. 5.0, page 5);
 - b. Updated references in the SP where the Maryland Annotated Code is referenced and utilized to provide specific legal guidance for billing operations. These sections include 3.4 Delayed Collection Action, 3.5: Charitable Institutions, and 5.1: Statutory Authority for Counsel's Office (Sec. 5.1; page 5).

Below are some statistics that reflect the Commission’s current activity and customer investment for addressing high bills, including those related to on-property leaks.

Chart 1 - Selected Billing Adjustment Statistics

Snapshot of Adjustments for Customers				
Description	FY2016	Count	FY 2017	Count
Unreasonably high water bill (including leaks)	\$1,970,790	2,939	\$2,581,528	3,645
Underground Leak	\$547,651	134	\$712,940	151
Total Adjustments for Customers				
Description	FY2016	Count	FY 2017	Count
Total	\$4,677,381	5,324	\$7,766,114	7,244

Customer Investment

Chart 1 above provides a snapshot of the Commissions’ expenditures for high bills in FY 2016 (\$1,970,790) and FY 2017 (\$2,581,528). We anticipate spending approximately \$2.1 million for high bill adjustments in FY 2018.

The fiscal impact for the recommended changes represents an additional, projected investment of approximately \$1 million annually, above the \$2.1 million projected to be spent on high bill adjustments this fiscal year. The costs associated with the changes include an increased number of adjustments, additional staff time to process these adjustments, and additional postage for notifications to customers.

Next Steps

Below are the actions we will be taking to continue moving forward:

- We will request approval of the recommended changes to the Adjustments and Correction of Water/Sewer Bill regulation at the January 17, 2018 Commission Meeting. If approved, and after complying with the mandatory 30-day publication required by law, the regulation will be effective on March 1, 2018.
- We will communicate our progress to Senators Rosapepe and Pinsky and keep them apprised of our efforts.
- We will continue improving communications and educational outreach to our customers about resolving leaks, mitigating high bills, and sharing tips with homeowners on how to maintain on-property plumbing.

Commissioners
Adjustments and Correction of Water/Sewer Bills (CUS 10-01)
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- By the end of FY 2018, we expect to have gained your approval for this regulation as well as approval on the Customer Assistance Program Standard Procedure/Regulation.

Your support and approval for these recommended changes enables us to improve customer service and our billing adjustment practices.

Thank you for your review and feedback. Please let me know if you have any questions.

cc: Heather Ashbury, Associate Counsel II
Damion Lampley, Utility Services Director

Attachments:

1. Working Draft - Updated Adjustment and Correction of Water/Sewer Bills SP
2. Overview of Changes to Adjustment and Correction of Water/Sewer Bills SP

Attachments

STANDARD PROCEDURES

OF THE

WASHINGTON SUBURBAN SANITARY COMMISSION

Sponsor Crystal Knight-Lee, Director, Customer Service	SP or Regulation Number REG Supersedes CUS 10-01	Approve By/Date	Recurring Review Period	Effective Date	Page 1 of 5
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Title: ADJUSTMENT AND CORRECTION OF WATER/SEWER BILLS

I. Purpose

- 1.0 To describe when and how WSSC will "adjust" bills that have been rendered correctly.
- 1.1 To describe when and how WSSC will "correct" bills that have been rendered incorrectly.

II. Definitions

- 2.0 **Average Daily Consumption (ADC)** - The average number of gallons of water utilized at a property per day, as determined by dividing: a) the total gallons of water passing through a meter between one meter reading and another; b) by the number of calendar days that have elapsed since the last meter reading.
- 2.1 **Comparable Average Daily Consumption** - A property's ADC one year earlier during the same or roughly the same period as the bill for which correction or adjustment is requested, as long as the current customer and the same number of occupants resided at the property during the earlier period.
- 2.2 **Current ADC** - The ADC of a property, measured for a minimum 10-day period following a repair or following a high billing period.
- 2.3 **Multi-Unit Commercial Property** - Any multi-unit, non-residential property that is directly billed by WSSC and utilized as a business.
- 2.4 **Multi-Unit Residential Property** - A multi-unit (two or more) residential housing property directly billed by WSSC. Note: Mixed unit Residential/Commercial Unit Properties will be considered Multi-Unit Residential Properties.
- 2.5 **Over-registering Meter** - A meter that is 2" or smaller tested by WSSC according to the American Water Works Association (AWWA) standards and found to be registering more than 101.5% of the water passing through the meter; or a similarly tested meter that is larger than 2" found to be registering more than 103% of the water passing through the meter.
- 2.6 **Single Unit Commercial Property** - A single unit, non-residential property that is directly billed by WSSC and utilized as a business.

WORKING DRAFT FOR DISCUSSION PURPOSES
WSSC STANDARD PROCEDURE
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- 2.7 **Single Unit Residential Property** - A single unit property exclusively used as a residence and directly billed by WSSC.
- 2.8 **Under-registering Meter** - A meter that is 2" or smaller tested by WSSC according to the AWWA standards and found to be registering less than 98.5% of the water passing through it; or a similarly tested meter that is larger than 2" found to be registering less than 97% of the water passing through it.
- 2.9 **Vandalism** - Willful or malicious destruction or damage of property.

III. Adjustment Type

- 3.0 **High Bill Adjustment (Single Unit Residential Properties)** - An owner is responsible for maintaining his/her property's plumbing system, including identifying and repairing all leaks to that system. An owner is, therefore, responsible for paying all billed water and sewer charges including water passing through the meter as a result of plumbing system leaks. However, if a single unit residential customer receives a bill with an ADC at least three times the comparable ADC (or current ADC if comparable is unavailable) and the customer is not eligible for any other adjustment set forth in this Standard Procedure. WSSC will adjust the one high bill at the customer's request. The new adjusted bill will exclude water and sewer use charges attributable to 50% of the water use in excess of the property's comparable ADC, or current ADC if the comparable is unavailable. Eligible customers may receive such an adjustment only once for one billing period in any three-year period.
- 3.1 **One-Time High Bill Adjustment (Single Unit Commercial Properties)** - A single-unit commercial property may be eligible for a one time, one-bill reduction due to unexplained reasons and for which no other applicable WSSC policy exists. The high bill must be at least three times higher than the comparable ADC or the current ADC if the comparable is unavailable. At the customer's request, WSSC will adjust the high bill. The new adjusted bill will exclude water and sewer use charges attributable to 25% of the water and sewer use in excess of the comparable ADC, or the current ADC if the comparable is unavailable. Eligible customers may receive such an adjustment only once, for one billing period.
- 3.2 **Leaks On-Property** - Underground Leaks (Residential or Commercial; Single or Multi-Unit) If WSSC verifies that a) a customer has been billed for water lost due to an underground leak and b) that the leak has been repaired by a plumber registered with WSSC, then WSSC will issue an adjusted bill to exclude up to six months of excess water and sewer use charges based on the property's comparable ADC, or if there is no comparable ADC, the current ADC.
- 3.3 **Underground Leaks, Off Property (Residential or Commercial; Single or Multi Unit)** - Most meters are located at the property line. However, in unusual cases, meters are located off the customer's property. In such cases, if an underground leak occurs on the service line before the property line but after the water has passed through the meter, all bills reflecting excess water lost due to the leak will be adjusted.

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The adjusted bill(s) will exclude all excess water and sewer use charges based on the comparable ADC, or if there is no comparable ADC, the current ADC.

- 3.4 **Delayed Collection Action (Single Unit Residential & Single Unit Commercial)** -A bill rendered to an account in the name of a tenant in a single unit residential property or single unit commercial property that is left unpaid after the tenant vacates the property is ultimately the responsibility of the property owner pursuant to Maryland Annotated Code, Public Utilities Article, § 25-504(e). However, if WSSC failed to disconnect service to the property for non-payment of the delinquent balance on the date that the property was eligible for disconnection, all charges that accrued after that date and up to the tenant's move-out date will be excluded from the bill. The property owner shall be responsible for the unpaid charges up to the date the water should have been turned off.
- 3.5 **Charitable Institutions** - Pursuant to the Maryland Annotated Code, Public Utilities Article, § 25-506, WSSC provides charitable institutions with up to 100 gallons of water a day per resident without cost. To qualify for the WSSC charitable credit, the institution must be one which provides residential 24-hour care for indigent persons without regard to ability to pay and without regard to whether the person is a resident of Montgomery or Prince George's County. From time to time, but not more frequently than once per year, WSSC may require a charitable customer to certify that it continues to meet the criteria required by Public Utilities Article § 25-506 and this Standard Procedure. Failure to return the certification within the time period specified shall result in discontinuation of the charitable credit until such certification is restored. During the time of no certification, the institution shall be liable for all charges as billed, unless there can be established a basis for restoring the charitable credit during the non-certification period. The charitable credit is determined by calculating an average per-resident ADC by dividing the property's total water usage by the number of calendar days in the billing period by the total average number of persons residing at the charitable property for that billing period. If the average per-resident ADC is below 100 gallons per day, then the water/sewer charges will be zero. If the per-resident ADC is 100 gallons or above, then the property will be billed based upon the actual ADC, with a credit of 100 gallons per day per resident.
- 3.6 **Credits for Customers with Physical or Mental Impairment (Single Unit Residential)** - When all adult residents occupying a property are either hearing/visually impaired or otherwise physically or mentally challenged, bills that include excess usage charges arising from a leak that was not apparent to the occupants due to the impairment(s) will be adjusted. Both excess water and sewer charges will be reduced to the level of the comparable period, or if there is no comparable ADC, to the current ADC. To qualify for the adjustment, the customer must provide a repair receipt and a physician's letter certifying a physical and/or mental impairment for all adult occupants. This adjustment will cover all billing periods affected by the leak.

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- 3.7 **Fire or Vandalism (Residential or Commercial; Single or Multi-Unit)** - A bill resulting from water lost during a fire or as a result of an act of vandalism will be adjusted. The bill and water use must coincide with a period during which the fire or act of vandalism occurred. Additionally, the customer shall not be responsible for payment for damage to any meter during a fire or act of vandalism, or for fees to turn the water off or on due to such act of fire or vandalism. To qualify for an adjustment in either case, the customer shall submit documentation in the form of a timely filed police report or fire department report. The adjusted bill will exclude all excess water and sewer charges based on the comparable ADC, or if there is no comparable, the current ADC.
- 3.8 **Public Fountain Use** - Bills including charges for water used at public drinking fountains located at parks owned by the Maryland National Capital Park & Planning Commission shall be adjusted each quarter to exclude 5,000 gallons of water and sewer charges for each fountain. The adjusted charges shall not exceed the total water usage for that period. If the adjusted charges would exceed the total water usage for the period, the charges will be based on zero consumption.
- 3.9 **Discolored Water or Sod Restoration (Single/Multi Unit Residential)** - A bill shall be adjusted when a customer has experienced a high bill due to having to run the water in the home to clear discoloration, or due to watering of sod replaced or restored by a WSSC contractor. Confirmation of the discolored water or sod restoration shall be provided by maintenance records, or be otherwise verified by WSSC staff. The adjusted bill will exclude both water and sewer charges in excess of the comparable ADC or, if unavailable, the current ADC.
- 3.10 **Unpaid Previous Owner Charges (Residential or Commercial; Single or Multi Unit)** - Upon notification that a property has been transferred, WSSC will adjust the bill provided to the new property owner to exclude unpaid charges that were incurred by the previous owner prior to the date that title to the property was transferred. In the case of a foreclosure sale, upon receipt of a certified copy of the Court order ratifying the foreclosure sale, WSSC will adjust the bill provided to the foreclosure sale purchases to exclude unpaid charges incurred prior to the date of the Court Order.
- 3.11 **Gasket Leak on Meter (Residential or Commercial; Single or Multi-Unit)** - An account shall be adjusted for all excess water and sewer charges when a gasket leaking on a meter registers on the meter (that is, the leaking gasket is on the "house side" of the meter.) The comparable ADC or, if unavailable, the current ADC will be used as the basis of the adjustment.
- 3.12 **Illegal Consumption (Single Unit Residential)** - Charges rendered to a property owner that resulted from the illegal water/sewer usage of a tenant who has vacated the property will be removed up to the date the tenant moved out.
- 3.13 **Lining Project (Residential or Commercial; Single or Multi-Unit)** - Charges resulting from water used during cleaning and lining of a water main, or due to the switching of meters in a dual meter pit will be adjusted based on the comparable ADC or, if unavailable, the current ADC.

IV. Correction Types

- 4.0 **Theft of Service (Residential or Commercial; Single or Multi-Unit)** - A corrected bill will be rendered for illegal water/sewer usage (including, but not limited to straight pipe connections, stolen or damaged meters, and meter bypasses left open), during the period for which WSSC can reasonably determine the charges. The corrected bill will be based on the property's comparable ADC or, if unavailable, the current ADC immediately after the illegal connection has been removed.
- 4.1 **Incorrect Service - (Residential or Commercial; Single or Multi-Unit)** A bill or bills rendered on the basis of a service other than that actually provided the property will be corrected for no more than the previous 12 months, if the correction results in a bill increase. If the correction results in a bill decrease, WSSC will adjust incorrect charges for a period of not to exceed three years from the date that WSSC discovered the incorrect service. For example, bills rendered for water use only to a property receiving both water and sewer service will be corrected to include sewer use charges calculated on the basis of the property's billed water use, for a period not to exceed 12 months. However, bills rendered for water and sewer service to a property actually receiving only water service will be corrected to exclude sewer charges for up to three years.
- 4.2 **Over-registering Meter (Residential or Commercial; Single or Multi-Unit)** - A bill or bills rendered on the basis of a reading from a meter which is subsequently found to be over registering the property's actual water consumption will be corrected for a period not to exceed three years. The corrected bills(s) will be rendered on the basis of the property's ADC immediately following the meter's repair or replacement.
- 4.3 **Under-registering Sub-Meter (Residential or Commercial; Single or Multi-Unit)** - A bill rendered on the basis of a reading from an under-registering sub-meter or its remote reading device will be corrected for a period of no more than three years. The corrected bill(s) will be based on the average daily sewer use before the sub-meter or its remote reading device began to malfunction or, if unavailable, the current average daily sewer uses immediately following the sub-meter's repair or replacement.

V. Approval of Bill Adjustments and Corrections

- 5.0 The Customer Service Director is delegated authority to approve any bill adjustments and corrections made under these Procedures. The Customer Service Director may also appropriately sub-delegate by written notification to the Commission's Secretary, portions of this authority to Customer Relations Group management or staff.
- 5.1 The General Counsel certifies that the statutory authority for the adoption of this Standard Procedure is §§ 25-501 to 25-508 of the Maryland Annotated Code, Public Utilities Article. Any conflict between this Standard Procedure and the Maryland Annotated Code will be resolved in favor of the latter.

Overview of Recommended Changes – December 20, 2017 Commission Meeting
Adjustment and Correction of Water/Sewer Bills – SP Number CUS 10-01

Attachment #2

#	Policy Reference	Policy Section	Current Language	Proposed Language	Rationale	Customer Impact
1	Pg. 1, Sec 2.2	Definitions: Current ADC	The ADC of a property following a repair or following a high billing period.	The ADC of a property, measured for a minimum 10-day period, following a repair or following a high billing period.	Provides sufficient time to validate that the consumption has stabilized following a repair.	No Change
2	Pg. 1, Sec. 2.5	Definitions: Over-registering meter	A small meter that is 1" or smaller tested by WSSC according to AWWA standards found to be registering more than 101.5% of the water passing through the meter; or similarly tested large meter that is larger than 1" found to be registering more than 103% of water passing through the meter.	A meter that is 2" or smaller tested by WSSC according to the AWWA standards found to be registering more than 101.5% of the water passing through the meter; or similarly tested meter that is larger than 2" found to be registering more than 103% of water passing through the meter.	Provides clarity on meter size. Accuracy standards and testing thresholds remain the same.	No Change
3	Pg. 1 Sec. 2.8	Definitions: Under-registering meter	A small meter (1" or smaller) tested by WSSC according to AWWA standards found to be registering less than 98.5% of the water passing through it; or a similarly tested larger meter larger than 2" found to be registering less than 97% of the water passing through it.	A meter that is 2" or smaller tested by WSSC according to the AWWA standards and found to be registering less than 98% of the water passing through it; or a similarly tested meter that is larger than 2" found to be registering less than 97% of the water passing through the it.	Provides clarity on meter size. Accuracy standards and testing thresholds remain the same.	No Change

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Attachment #2

#	Policy Reference	Policy Section	Current Language	Proposed Language	Rationale	Customer Impact
4	Pg. 2	High Bill Adjustment - Budget	The adjustments set forth....are subject to the availability of funds in the approved annual budget....	N/A. Section removed.	Language is outdated; No budget or limit has been practiced for several years.	No Change
5	Pg. 2; Sec. 3.0	High Bill Adjustment – Single Unit Residential Properties	...if a single unit residential customer receives a bill with an ADC at least three times higher than the comparable ADC (or current ADC if comparable is unavailable) and no other applicable WSSC adjustment policy exists , WSSC will adjust the one high bill at the customer’s request.	...if a single unit residential customer receives a bill with an ADC at least three times higher than the comparable ADC (or current ADC if comparable is unavailable) and the customer is not eligible for any other adjustment set forth in this Standard Procedure , WSSC will adjust the one high bill at the customer’s request.	Clarifies eligibility for a high bill adjustment and fiscal responsibility for the Commission by minimizing stacking of adjustments. Generally the adjustment most beneficial to the customer is given.	No Change
6	Pg. 2; Sec. 3.0	High Bill Adjustment – Single Unit Residential Properties	Eligible customers may receive such an adjustment only once for one billing period in any seven-year period .	Eligible customers may receive such an adjustment only once for one billing period in any three-year period .	Recognizes that customers want relief from unusually high water/sewer bills due to leaks on-property.	Yes-Positive

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#	Policy Reference	Policy Section	Current Language	Proposed Language	Rationale	Customer Impact
7	Pg. 2; Sec. 3.2	Leaks on-Property: Underground Leaks (Residential or Commercial; Single or Multi-unit)	<p>Secondary Water Line: If WSSC verifies through repair receipts that a customer has been billed for water lost due to a leaking secondary water line located underground on the customer's property (for example, a waterline between two buildings), the account will be adjusted to exclude up to the highest consecutive six months' of excess sewer use charges.</p> <p>The basis of the adjustment will be the comparable ADC or, if there is no comparable ADC, the current ADC.</p> <p>Main Water Line: If WSSC determines that the leak occurred on the water line between the property line and the main valve serving the property, the adjusted bill will exclude up to six months of excess water and sewer use charges based on the property's comparable ADC or if there is no comparable ADC, the current ADC.</p>	<p>If WSSC verifies that a) a customer has been billed for water lost due to an underground leak and b) that leak has been repaired by a plumber registered with WSSC, then WSSC will issue an adjusted bill to exclude up to six months of excess water and sewer use charges based on the property's comparable ADC, or if there is no comparable ADC, the Current ADC.</p>	<p>Customers will receive credit up to six months for underground leaks including leaks on secondary water line. Previously, customers with leaks on secondary water lines only received credit for sewer use charges.</p> <p>This change provides additional simplification and clarity for commercial and residential customers.</p> <p>The Customer Service Department will work with GCO to assist Utility Services with creating a separate SP on unrepaired leaks and customer notification.</p>	Yes-Positive

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Adjustment and Correction of Water/Sewer Bills – SP Number CUS 10-01

Attachment #2

#	Policy Reference	Policy Section	Current Language	Proposed Language	Rationale	Customer Impact
8	Sec. 3.4	Delayed Collection Action	Maryland Annotated Code, Article 29, Section 6-104(b) (4)(iv.)	Maryland Annotated Code, Public Utilities Article, § 25-504	Updates reference in alignment with MD Annotated Code.	No Change
9	Sec. 3.5	Charitable Institutions	Maryland Annotated Code, Article 29, Section 6-105	Maryland Annotated Code, Public Utilities Article, § 25-506	Updates reference in alignment with latest MD Annotated Code.	No Change
10	Sec. 3.12	Bankruptcy Denied (Residential or Commercial; Single or Multi Unit)	If a customer's bankruptcy petition is dismissed by the Court, the outstanding charges that were removed upon filing shall be reapplied to the customer's account and included with the next quarterly billing.	N/A. Section removed.	This is not a stand-alone adjustment; process will continue to be included in internal operating materials and training materials.	No Change
11	Sec. 5.0	Approval of Bill Adjustments and Corrections – Delegated Authority	The Customer Care Team Chief is delegated authority to approve any bill adjustments and corrections made under these procedures. The Team Chief may also appropriately sub-delegate by written notification to the Commission's Secretary portions of this authority to Customer Relations Group Management or staff.	The Customer Service Director is delegated authority to approve any bill adjustments and corrections made under these procedures. The Director may also appropriately sub-delegate by written notification to the Commission's Secretary portions of this authority to Customer Service Dept. Management or staff.	Updates Department information.	No Change

Overview of Recommended Changes – December 20, 2017 Commission Meeting
Adjustment and Correction of Water/Sewer Bills – SP Number CUS 10-01

Attachment #2

#	Policy Reference	Policy Section	Current Language	Proposed Language	Rationale	Customer Impact
12	Sec. 5.1	Approval of Bill Adjustments and Corrections – Statutory Authority	The General Counsel certifies that the statutory authority for the adoption of these Standard Procedures is Article 29, Section 9- 101, 6-104, 6-105, 6-111, & 8-101 of the Annotated Code of Maryland . Also, any conflict between these Procedures and the Annotated Code will be resolved in favor of the latter.	The General Counsel certifies that the statutory authority for the adoption of this Standard Procedure is §§ 25-501 to 25-508 of the Maryland Annotated Code, Public Utilities Article . Any conflict between this Standard Procedure and the Maryland Annotated Code will be resolved in favor of the latter.	Updates references in alignment with MD Annotated Code	No Change