

TO: Chairman Burgos, Chairman Metzgar, and members of the House Consumer Protection, Technology, and Utilities Committee

FROM: Jennie Shade, Senior Director of Government Relations



DATE: June 17, 2026

SUBJECT: Opposition to HB 1213 P.N. 1361

I am writing on behalf of the Pennsylvania Municipal Authorities Association (PMAA), a statewide organization that represents nearly 700 municipal authorities across Pennsylvania. Together, these authorities serve more than six million people, with the vast majority providing essential drinking water and wastewater treatment services to communities across the state.

PMAA respectfully **opposes** HB 1213 P.N. 1361, which amends Title 53, Chapter 56 (Municipal Authorities) to require municipal authorities to notify customers when a property's water usage exceeds 200% of its average monthly consumption and to make efforts to contact customers by telephone or email. The bill would also require authorities to assist customers in "identifying potential leaks or other wasteful inefficiencies on the property" that may be contributing to the increased water usage.

Municipal authorities across Pennsylvania already provide customer education, investigate unusual consumption patterns, assist customers experiencing high water bills, and invest in technologies that improve access to water-use information. While the goal of HB 1213 is laudable, the bill would fundamentally alter the traditional role of municipal authorities by imposing new responsibilities related to private property that they are neither structured nor equipped to perform.

At its core, HB 1213 would require municipal authorities not only to notify customers of atypical water usage, but also to assist customers in identifying potential leaks and other "wasteful inefficiencies" occurring on private property. This represents a significant departure from the long-established division of responsibility between water utilities and property owners.

Municipal authorities are responsible for operating and maintaining public water infrastructure. In most systems throughout Pennsylvania, the authority's responsibility ends at the utility-owned portion of the water system, while plumbing systems located on private property are owned and maintained by the property owner. Diagnosing leaks, evaluating plumbing systems, and identifying inefficiencies within homes, businesses, and industrial facilities are functions traditionally performed by property owners and plumbing professionals, not water utilities.

HB 1213 would blur this important distinction and create uncertainty regarding the extent of an authority's obligations. The bill effectively creates a new expectation that water providers evaluate conditions occurring on

private property, exposing authorities to risks and responsibilities beyond their core mission of providing safe and reliable water service.

The bill also introduces ambiguity by requiring authorities to assist customers in identifying "wasteful inefficiencies," a term that is not defined in HB 1213. Water usage patterns vary significantly based on household size, occupancy, seasonal activities, medical needs, business operations, and countless other factors. Without clear statutory guidance, authorities could be placed in the position of making subjective judgments regarding customer water use practices and personal choices. Such determinations are beyond the expertise and intended function of municipal authorities.

Although we appreciate that the bill has been revised from the prior legislative session by increasing the notification threshold from 50% to 200% above average usage, significant implementation concerns remain. Many municipal authorities do not bill customers monthly and may not maintain billing systems that calculate usage in the manner prescribed by HB 1213. Compliance could require modifications to billing software, reporting protocols, and customer service procedures, resulting in additional costs that ultimately would be borne by ratepayers.

The bill also leaves uncertainty regarding the definition and scope of the term "utility customer." In many cases, the party receiving the water bill is not the individual occupying or directly using the property. Multifamily housing, tenant-occupied properties, commercial facilities, and industrial operations frequently involve ownership and billing arrangements that complicate customer communication and raise questions regarding compliance.

Importantly, municipal authorities are already taking meaningful steps to address the concerns that motivated this legislation. Authorities routinely provide educational materials regarding leak detection and water conservation, assist customers in understanding unusual water usage, and invest in Advanced Metering Infrastructure and related technologies that can provide near real-time usage information and customizable leak alerts. These approaches empower customers while preserving the appropriate division of responsibilities between authorities and property owners.

While HB 1213 is well-intentioned, it creates a new statutory obligation that extends municipal authority responsibilities beyond the public water system and into the diagnosis of conditions occurring on private property. In doing so, it introduces uncertainty, liability concerns, operational challenges, and additional costs without adequately accounting for the diverse operational realities of Pennsylvania's water systems.

PMAA recognizes the importance of improving customer awareness and encouraging responsible water use. A more effective approach would preserve flexibility for municipal authorities to implement notification programs that reflect their individual systems, customer communication practices, and available technology. Supporting voluntary, locally designed solutions would allow authorities to continue addressing unusual water usage while avoiding unintended mandates that may increase costs or create confusion regarding the responsibilities of water providers and property owners.

For these reasons, we respectfully ask that you **oppose** HB 1213 P.N. 1361. PMAA welcomes the opportunity to work with the General Assembly on alternative approaches that promote water conservation, customer awareness, and leak detection while preserving local flexibility and avoiding unnecessary mandates on municipal authorities. Thank you for your consideration of our comments.