

Automating Customer Communications for a Lead Service Line Replacement Program



New Jersey American Water uses 120Water's digital water platform to meet strict state compliance standards for sending material notices to customers, including both primary residents and property owners

BACKGROUND

New Jersey American Water, based in Camden, is the largest water service provider in the state, serving approximately 2.9 million people in more than 190 communities through more than 30 public water systems. In 2021, the state of New Jersey enacted a law requiring all water service providers to identify the material of both utility-owned and customer-owned service lines, notify customers with service lines that are made of lead or galvanized [steel] requiring replacement (GRR), and replace them by 2031. In addition, lead service line inventories had to be posted on water systems' websites by January 2022, with notifications about known lead service lines distributed no later than February 21, 2022.

If the customer-owned portion of a service line is made of lead or galvanized steel, New Jersey American Water will replace it at no direct cost to the customer as part of its Lead Service Line Replacement Program. It's important to note that in the interim, the utility treats water to prevent corrosion of service lines and household plumbing. Its ongoing lead and copper compliance testing meets state and federal water quality standards, including those for lead. So even if a service line contains lead, that doesn't mean customers can't use water as they normally would.

THE CHALLENGE

Not only does New Jersey have an accelerated schedule for replacing lead service lines, it also has expedited and more stringent public notification requirements than the Environmental Protection Agency's (EPA's) Lead and Copper Rule Revisions (LCRR). Specifically, the New Jersey Department of Environmental Protection (NJDEP) requires water systems within the state to:

- Submit service line inventories, replacement progress reports, and replacement plans annually in July
- Send notices of lead or GRR service lines via certified letter 30 days after submitting inventories
- Send notices of unknown service lines via standard first-class mail no later than November 15, 2024
- Provide a translated copy of notices along with the English version if a water system serves a municipality in which 10% or more of its residents primarily speak a language other than English

NJDEP also requires that water systems send notices to each residential, commercial or institutional address to the attention of the primary resident or occupant in addition to any offsite property owner (e.g., a landlord who may live in another state).



EFFICIENCY

Easily set up the templates required for customer notifications regarding lead, GRR and unknown materials, add your water system's branding, merge with the appropriate data, and schedule distribution.



VISIBILITY

Track material notices to see when they're distributed to customers and monitor their status, including delivery rate and returns.



REPORTING

Demonstrate compliance with real-time reports that show what customer notifications were sent, when they were sent, and what their status is.

THE SOLUTION

New Jersey American Water began working with 120Water in 2021 to help manage the significant volume of the customer notifications required to comply with both state and federal laws. 120Water's PWS Pro software handles large-scale preparation and distribution of notices via first-class mail as well as send certified letters to meet this particular customer's unique state environmental protection requirement.

However, the main selling point was the ability to track the certified letters for known lead and GRR service lines because they must meet strict postmark dates. 120Water's platform can quickly and easily provide an audit trail to New Jersey American Water to clearly show how many certified versus first-class letters went out, when they went out, and when they were delivered.

THE RESULTS

For three years, 120Water has been managing New Jersey American Water's customer notifications for its lead-related compliance programs. With 120Water's PWS Pro software, it's easy to set up the appropriate templates and distribute the required letters. But most important, the send date and delivery status can be tracked for each piece of mail. This visibility gives the utility confidence the required communications entered the mail stream to meet the notification deadline.

Exactly how many service line material notices are we talking about?

- 120Water has coordinated the distribution of 26,500 letters via standard first-class or certified mail.
- Certified letters are only required for newly identified lead or GRR service lines during the last year; standard letters may be sent to occupants and owners of properties with previously identified but unreplaced lead or GRR service lines.
- In preparing to meet the larger annual notification for service lines of unknown material, 120Water anticipates more than 500,000 letters will be distributed via standard mail.

Because of PWS Pro's tracking functionality and 120Water's ability to deliver specific data sets, New Jersey American Water can see when notices are sent, the delivery rate, and the return-to-sender rate. Knowing the expected delivery date also allows the utility to anticipate and prepare for a potential influx of calls from customers who have questions about the information they just received as well as the next steps for replacement or verification, depending on the material notice.

The lift for New Jersey American Water's personnel in managing these notifications to their customers is minimal, with 120Water entrusted to work with provided data, configure the templates, trigger the distribution, and pull required reports. As an investor-owned/publicly traded company, the utility was able to invest considerable time and resources in developing and governing its own service line inventory database and therefore was able to furnish 120Water with clean, readily available data that distinguished between property owners who receive the bills and residents/occupants who are water service consumers.



BRANDED TEMPLATES

Including utility-specific logos and other branding elements are more easily recognized and better received by customers.



CLEAN DATA

Having the right data and ensuring its accuracy is essential to delivering notices to meet regulatory requirements. In addition to managing customer communications, 120Water's PWS Pro software also can be used to catalog and manage ongoing service line inventories.

SEND, TRACK & DEMONSTRATE COMPLIANCE FOR CUSTOMER COMMUNICATIONS

We can help with any state or federal public notification requirements. Connect with one of our experts at [120water.com/LCRR-assistance](https://www.120water.com/LCRR-assistance).