

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-16. Please provide by month for the most recent 36 months available,  
disaggregated by type of deferred payment arrangement:

- a. The number of agreements where the arrangement was not met during the month;
- b. The number of agreements on which the payment was made during the month;
- c. The number of agreements that defaulted (i.e., cancelled for nonpayment) during the month.

**Response:** See response to PA-RDC-15. Please note there are no reports available that capture data for subsections (a) through (c).

**Response Provided by:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-17. By month for the most recent 36 months available, please provide for the first day of each month:

- a. The dollars subject to active deferred payment arrangements;
- b. The dollars of residential accounts in arrears;
- c. The dollars of accounts subject to active deferred payment arrangements.

**Response:** Due to the voluminous nature of the request, copies of the Accounts Receivable Aging reports will be provided upon request in CD form. Please note that there are no reports available that capture data on the first day of each month; the data is reported for the last day of each month. Please note there are no reports available that capture data for subsections (a) and (c).

**Response Provided By:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-18. Please provide all collectability studies, prepared within the past five years, for:

- a. Residential accounts in arrears;
- b. Residential accounts in arrears subject to deferred payment arrangements.

**Response:** There was no collectability studies prepared within the past five years that address subsections (a) and (b).

**Response Provided By:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-19. Please provide all studies, memos or other written documents of any nature within the possession or control of the PWD/WRB evaluating, assessing or otherwise discussing:

- a. Why utility customers do not pay their utility bills;
- b. The order in which residential customers pay their bills (e.g., rent/mortgage first, utility bills second, credit cards third, etc.);
- c. To whom or to where customers turn for information and/or bill payment assistance when they have unpaid utility bills.

**Response:** There are no studies, memos, or other written documents of any nature within the possession or control of the PWD/WRB evaluating, assessing, or otherwise discussing subsections (a) through (c).

**Response Provided By:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-20. Please provide all studies, memos or other written documents of any nature within the possession or control of the PWD/WRB evaluating, assessing or otherwise discussing why utility customers do not contact their billing utility when asked to do so in shutoff notices or in other communications proffered to the customer in response to nonpayment.

**Response:** There are no studies, memos, or other written documents of any nature within the possession or control of the PWD/WRB evaluating, assessing, or otherwise discussing why utility customers do not contact their billing utility when asked to do so in shutoff notices or in other communications proffered to the customer in response to nonpayment.

**Response Provided By:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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- PA-RDC-21. Please provide a schedule indicating, by year for the past three years:
- a. All entities external to the PWD, including all municipal agencies or entities, charged with collecting revenue for the Department;
  - b. For each entity identified, the fees paid that entity, in total and by unit (e.g., dollars collected, account collected) for their collection activity;
  - c. The basis for determining the level of the fees paid to each entity.

**Response:** See attachment Response PA-RDC-21. Please note that in response to subsection (b), there is no report available for the fees paid to the vendor “by unit.”

**Response Provided by:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-22. Reference: Davis. Exhibit JD-1. From the projects listed in “relevant project experience,” as well as from the “other relevant project experience,” please identify each project in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. For each identified project, please provide a single copy of all written work-products (e.g., testimony, report, memo PowerPoint) that sets forth such consideration and/or discussion.

**Response:** Per my direct testimony, I have worked with developing new Customer Affordability Programs for Richmond (VA) Department of Public Works, Washington Suburban Sanitary Commission (MD), and the City and County of Honolulu (HI) Department of Environmental Services. In addition, I have worked with existing Customer Affordability Programs for DC Water and the Columbus (GA) Water Works. RFC does not have ownership rights to these work products and is not authorized to disclose them.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-23. Reference: Davis. Exhibit JD-1. From each of the speaking engagements listed, please identify each one in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or addressed. For each identified speaking engagement, please provide a single copy of all written work-products (e.g., speech, PowerPoint, underlying article/report) that sets forth such consideration and/or discussion.

**Response:** There were no cited speaking engagements related to development or implementation of a Customer Affordability Program.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-24. Reference: Davis. Exhibit JD-1. For each publication for which the witness was an author, co-author or contributor, whether a report, memo, article, book chapter or other publication of any nature, please identify each one in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or addressed. For each identified publication, please provide a single copy of the publication that sets forth such consideration and/or discussion.

**Response:** “Financial Capability and Affordability” by Jon P. Davis and Manuel P. Teodoro is a chapter of Water & Wastewater Financing and Pricing, Fourth Edition, © 2015 by Taylor & Francis Group, LLC.

Raftelis, George A. et al, Water & Wastewater Financing and Pricing, Fourth Edition, pp. 443-465, CRC Press, Boca Raton, FL, 2015.

“Is Our Water Affordable?” by Jon Davis and Joe Crea is an article in the Journal of the American Water Works Association

Jon Davis and Joe Crea, “Is Our Water Affordable?” Journal of the American Water Works Association, July, 2014.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-25. Reference: Kreps. Exhibit BK-1. From the projects listed in “relevant project experience,” as well as from the “other relevant project experience,” please identify each project in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. For each identified project, please provide a single copy of all written work-products (e.g., testimony, report, memo PowerPoint) that sets forth such consideration and/or discussion.

**Response:** Mr. Kreps did not provide testimony on low income assistance programs in this rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-26. Reference: Kreps. Exhibit BK-1. From each of the speaking engagements listed, please identify each one in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or addressed. For each identified speaking engagement, please provide a single copy of all written work-products (e.g., speech, PowerPoint, underlying article/report) that sets forth such consideration and/or discussion.

**Response:** Mr. Kreps did not provide testimony on low income assistance programs in this rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-27. Reference: Kreps. Exhibit BK-1. For each publication for which the witness was an author, co-author or contributor, whether a report, memo, article, book chapter or other publication of any nature, please identify each one in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or addressed. For each identified publication, please provide a single copy of the publication that sets forth such consideration and/or discussion.

**Response:** Mr. Kreps did not provide testimony on low income assistance programs in this rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-28. Reference: Locklear. Exhibit HL-1. From the projects listed in “relevant project experience,” as well as from the “other relevant project experience,” please identify each project in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. For each identified project, please provide a single copy of all written work-products (e.g., testimony, report, memo PowerPoint) that sets forth such consideration and/or discussion.

**Response:** Ms. Locklear did not provide testimony on low income assistance programs in this rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-29. Reference: Locklear. Exhibit HL-1. From each of the speaking engagements listed, please identify each one in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or addressed. For each identified speaking engagement, please provide a single copy of all written work-products (e.g., speech, PowerPoint, underlying article/report) that sets forth such consideration and/or discussion.

**Response:** Ms. Locklear did not provide testimony on low income assistance programs in this rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-30. Reference: Locklear. Exhibit HL-1. For each publication for which the witness was an author, co-author or contributor, whether a report, memo, article, book chapter or other publication of any nature, please identify each one in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or addressed. For each identified publication, please provide a single copy of the publication that sets forth such consideration and/or discussion.

**Response:** Ms. Locklear did not provide testimony on low income assistance programs in this rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-31. Reference: Davis. Testimony, page 1. From each client listed, please identify each one for whom you prepared a written work product in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. Please provide a copy of each written work product so identified.

**Response:** Per my direct testimony, I have worked with developing new Customer Affordability Programs for Richmond (VA) Department of Public Works, Washington Suburban Sanitary Commission (MD), and the City and County of Honolulu (HI) Department of Environmental Services. In addition, I have worked with existing Customer Affordability Programs for DC Water and the Columbus (GA) Water Works. RFC does not have ownership rights to these work products and is not authorized to disclose them.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-32. Reference: Kreps. Testimony, page 1. From each client listed, please identify each one for whom you prepared a written work product in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. Please provide a copy of each written work product so identified.

**Response:** Mr. Kreps did not provide testimony on low income assistance programs in this rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-33. Reference: Locklear. Testimony, page 1. From each client listed, please identify each one for whom you prepared a written work product in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. Please provide a copy of each written work product so identified.

**Response:** Ms. Locklear did not provide testimony on low income assistance programs in this rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-34. Reference: Davis. Testimony, page 1. For the “numerous financial management engagements for water, sewer and storm water utilities” mentioned, please identify each one for whom you prepared a written work product (e.g., memo, report, PowerPoint) in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. Please provide a copy of each written work product.

**Response:** Per my direct testimony, I have worked with developing new Customer Affordability Programs for Richmond (VA) Department of Public Works, Washington Suburban Sanitary Commission (MD), and the City and County of Honolulu (HI) Department of Environmental Services. In addition, I have worked with existing Customer Affordability Programs for DC Water and the Columbus (GA) Water Works. RFC does not have ownership rights to these work products and is not authorized to disclose them.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-35. Reference: Davis. Testimony, page 2. Please provide a copy of:

- a. The 2014 book chapter on "Financial capability and affordability";
- b. The July 2014 AWWA Journal article "Is Our Water Affordable".

**Response:** Refer to response for PA-RDC-24.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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- PA-RDC-36. Reference: Davis. Testimony, page 2. For each year for the past three years, for each of the four payment plan types identified, provide:
- a. The number of payment plans entered into by payment plan type;
  - b. The aggregate dollars of arrears subject to such payment plans by payment plan type;
  - c. The number of payment plans defaulted (defined as having the plan cancelled due to nonpayment) by payment plan type;
  - d. The percent of dollars subject to such payment plans actually collected by payment plan type.

**Response:** See response to PA-RDC-15. Please note that there are no reports available that capture the data for subsections (b) through (d).

**Response Provided By:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-38. Reference: Davis. Testimony, page 3. For each new “Customer Affordability Program” listed, provide a copy of:

- a. The written scope of work governing your engagement;
- b. Any final written work product, including a final report, exit memo, PowerPoint presentation, or written document of any nature.

**Response:**

a. RFC is not able to provide the scope of work for all such engagements. Please see attachment Response PA-RDC-38 for a sample scope of work.

b. RFC does not have ownership rights to such work products and is not authorized to disclose them.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-39. Reference: Davis. Testimony, page 3. For each of the existing “Customer Affordability Program” listed, provide a copy of:

- a. The written scope of work governing your engagement;
- b. Any final written work product, including a final report, exit memo, PowerPoint presentation, or written document of any nature.

**Response:**

a. RFC is not able to provide the scope of work for all such engagements. Please see attachment Response PA-RDC-38 for a sample scope of work.

b. RFC does not have ownership rights to such work products and is not authorized to disclose them.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-40. Reference: Davis. Testimony, page 3. Please list all quantitative indicators developed and/or used by RFC by which the City can objectively determine the level of assistance below which that assistance is not “meaningful assistance to low-income customers. . .”

- a. Provide all documents used to support the reasonableness of these indicators;
- b. Provide a copy of all prior written documents of any nature in which these indicators were applied to a low-income program for a client other than PWD/WRB.

**Response:** It was the considered conclusion of both PWD and RFC that the Customer Affordability Program should confine its focus to meaningful assistance for qualifying customers. We did no analysis to quantify meaningful assistance.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-42. Reference: Davis. Testimony, page 3. Please list all quantitative indicators developed by and/or used by RFC by which the City can objectively determine the level at which program costs become “detrimental to the financial stability of the utility.”

- a. Provide all documents used to support the reasonableness of these indicators.
- b. Provide a copy of all written documents of any nature in which these indicators were applied to a low-income program for a client other than PWD/WRB.
- c. Provide a copy of all prior written documents of any nature in which these indicators were applied to a program other than a low-income program for a client other than PWD/WRB.

**Response:** Each utility must consider its own ability to manage risk, particularly cost risks associated with a new, and unknown, Customer Affordability Program. PWD reviewed its ability to absorb cost risks and arrived at the threshold as described in the testimony. No additional documents are available.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-43. Reference: Davis. Testimony, page 3. Of the written work products provided in response to Data Requests 31 through 34, please identify which, if any, calculated and/or discussed the fixed costs related to upfront information technology costs necessary to implement the program.

**Response:** Any thorough analysis of a Customer Affordability Program must look at fixed costs. In a municipal water and wastewater utility, these costs must ultimately be passed on to rate payers. All of the examples cited in my testimony included some level of review of fixed costs. New Customer Affordability Programs typically have higher upfront costs associated with program design and implementation. Existing programs have lower upfront costs related to program modification

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-44. Reference: Davis. Testimony, page 3. Of the written work products provided in response to Data Requests 31 through 34, please identify which, if any, calculated and/or discussed the “ongoing administration costs” necessary to implement the program.

**Response:** Any thorough analysis of a Customer Affordability Program must look at ongoing administration costs. In a municipal water and wastewater utility, these costs must ultimately be passed on to rate payers. All of the examples cited in my testimony included some level of review of ongoing administration costs.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-45. Reference: Davis. Testimony, page 3. Of the written work products provided in response to Data Requests 31 through 34, please identify which, if any, calculated and/or discussed the “delinquency costs. . .related to the limitations on the ability to collect on delinquent balances for customers enrolled” in an affordability program.

**Response:** Analysis of delinquency costs were not part of the projects cited in my testimony. As discussed in the testimony, delinquency costs have not been quantified in the PWD rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-46. Reference: Davis. Testimony, page 3. Of the written work products provided in response to Data Requests 31 through 34, please identify which, if any, calculated and/or discussed the “lost revenue costs related to the annual value of discounts given to customers enrolled in the affordability program.”

**Response:** Any thorough analysis of a Customer Affordability Program must look at lost revenue (or expense) associated with discounts provided to qualifying customers. In a municipal water and wastewater utility, these costs must ultimately be passed on to rate payers. All of the examples cited in my testimony included some level of review of lost revenue costs.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-47. Reference: Davis. Testimony, page 3. For each of the five (5) (Richmond, Washington Suburban, Honolulu, DC Water, Columbus, GA) new and existing Customer Affordability Programs with which you have worked as identified in your testimony, provide the following table:

**Response:** RFC does not have ownership rights to the work products from other engagements and is not authorized to disclose them.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-48. Reference: Davis. Testimony, page 3. Based on your work on the five new and existing Customer Affordability programs identified in your testimony, please identify each City, company, department or jurisdiction which provides a water, sewer and/or stormwater program on which you and/or RFC have *not* worked.

**Response:** The question is unintelligible as written.

**Response Provided By:** Andre Dasent

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-49. Reference: Davis. Testimony, page 3. Please identify each City, company, department or jurisdiction on which RFC staff, although not you personally, have, within the past ten years, worked with developing a new Customer Affordability Program or worked on an existing Customer Affordability Program. Identify each RFC staff person, the jurisdiction in which that staff person worked, the date of the engagement, and whether the program was a new or existing program.

**Response:** In addition to engagements cited in my testimony, RFC has been engaged in work related to affordability analysis and program development with the Birmingham (AL) Water Works Board, City of Jackson (MS), Charlotte-Mecklenburg (NC) Utilities, Northeast Ohio Regional Sewer District, City of Johnson City (TN), and San Antonio (TX) Water System. It should be noted that this category of engagement covers a broad range of services beyond development of a Customer Affordability Program.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-50. Reference: Davis. Testimony, page 3. Provide a line-item breakdown of the \$1.1 million in upfront costs in the greatest detail available.

**Response:** Upfront cost estimates relate to Information Technology and Technical Startup costs of the Customer Affordability Program. These costs were estimated prior to finalization of the program structure by City Ordinance 140607-AA. Upfront costs include a Business Analyst category (based on 2 person years at \$225,000 per person year by contract) and a Programmer category (based on 3 person years at \$225,000 per person year by contract).

<b>Category</b>	<b>Requirement</b>	<b>Unit Cost</b>	<b>Total</b>
Business Analyst	2 person years	\$225,000	\$450,000
Programmer	3 person years	\$225,000	\$675,000
			\$1,125,000

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

PA-RDC-51. Reference: Davis. Testimony, page 3. By year for the next three years, provide a line-item breakdown in the greatest detail available, of the \$2.8 million annual ongoing costs.

**Response:** Ongoing cost estimates relate to Water Revenue Bureau staffing to administer the Customer Affordability Program as well as Information Technology support to maintain the Basis2 Customer Information System. These costs were estimated prior to finalization of the program structure by City Ordinance 140607-AA. Ongoing costs in WRB include 16 Collections Customer Representatives, 2 Collections Representatives Supervisors, and 4 Data Services Support Clerks. Unit costs for each are shown below. In addition, we added Fringes and Benefits, Annualized Space Costs, and a 25% Contingency.

<b>Category</b>	<b>Requirement</b>	<b>Unit Cost</b>	<b>Total</b>
Customer Rep	16 FTEs	\$38,767	\$620,722
Rep Supervisor	2 FTEs	48,312	96,624
Data Services Clerk	4 FTEs	35,265	141,060
			<hr/>
			857,956
Fringes and Benefits			849,119
Space Needs			89,000
Implementation Contingency			449,019
			<hr/>
			\$2,245,094

Ongoing costs for Information Technology include 2.5 Support Staff. Unit costs by contract are shown below.

<b>Category</b>	<b>Requirement</b>	<b>Unit Cost</b>	<b>Total</b>
IT Support Staff	2.5 FTEs	\$225,000	\$562,500

Total ongoing costs were estimated at \$2,807,594.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-52. Reference: Davis. Testimony, page 3. By year for the next three years, provide a line-item breakdown in the greatest detail available of the administrative tasks to be performed by each of the 22 WRB positions and the number of annual hours devoted to each task.

**Response:** Number and job categories for the 22 additional WRB positions are included in the response to PA-RDC-51.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-53. Reference: Davis. Testimony, page 3. Confirm or deny. The 22 WRB positions used for program administration of the proposed Affordability Program are all new, incremental staff additions to WRB that would not be staff positions at WRB in the absence of the Affordability Program. If denied, provide a detailed estimate of: (a) how many of the 22 positions are new, incremental staff positions at WRB that would not be staff at WRB in the absence of the Affordability Program; (b) how many are staff positions reassigned and/or reallocated from existing WRB work; and (c) what existing staff positions will be reassigned and/or reallocated to the Affordability Program.

**Response:** Confirm.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-54. Reference: Davis. Testimony, page 3. Provide all internal workpapers and/or correspondence, including e-mails, generated by City Revenue, WRB, PWD, and/or Prophecy in developing:

- a. The upfront costs of the Affordability Program;
- b. The ongoing costs of the Affordability Program.

**Response:** Please see attachment Response PA-RDC-54, for the costs that were calculated and provided in an excel workbook. Please note that this excel workbook does not capture IT related costs, as no such spreadsheet was created.

**Response Provided by:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau and Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-55. Reference: Davis. Testimony, page 4. Please provide by month for existing WRAP participants for the most recent twelve (12) months available:

- a. The total billed revenue for current service;
- b. The total collected revenue;
- c. The average months dollars of arrears (not taking into account the dollars subject to the underlying payment plan);
- d. The collection factor for WRAP billings.

**Response:** Please note that there are no reports available that capture this data.

**Response Provided By:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-56. Reference: Davis. Testimony, page 4. Please provide by month for existing WRAP participants for the most recent twelve (12) months available:

- a. The monthly participation number;
- b. The average monthly bill for current service;
- c. The monthly revenue collected;
- d. The average monthly payment;
- e. The aging of accounts by available aging buckets by the number of accounts;
- f. The aging of accounts by available aging buckets by dollars.

**Response:** Please see attachment Response RDC-56 2015 WRBCC Statistics Reports. Please note that there are no reports available that capture the data for subsections (b) through (f).

**Response Provided By:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-57. Reference: Davis. Testimony, page 4. In concluding that “changes to the collection factor resulting from delinquency payment patterns under the new affordability program should result in de minimis changes to the blended collection factor,” please indicate:

- a. Whether that statement applies to the “blended collection factor” for the total PWD billings;
- b. If so, whether the identical statement would be made as to a “blended collection factor” applied only to WRAP billings;
- c. A list of each Pennsylvania utility, whether water, gas, or electricity, for which the impact of an affordability program on collection rates for program participants was reviewed and/or considered in reaching this conclusion;
- d. A copy of each evaluation of an affordability program, whether for a water, gas or electric utility, reviewed and/or considered by you and/or RFC in reaching your conclusion about the impact of an affordability program on payment patterns, which evaluation considered, reported or otherwise discussed the impacts of an affordability program on program participant payment patterns.
- e. A list of each evaluation of an affordability program, whether for a water, gas or electric utility, reviewed by you and/or RFC in reaching your conclusion which supports your conclusion that an affordability program “should result in de minimis changes to the blended collection factor.”

**Response:** a. Yes; b. Yes, as WRAP billings are part of the existing blended collection factor; c. None, as per my testimony, collection factor/delinquency costs were not considered in the cost of service with this rate filing; d. None; e. None.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

PA-RDC-58. Reference: Davis. Testimony, page 4. For each year for the most recent three years available, provide:

- a. The gross uncollectible rate for residential customers;
- b. The gross uncollectible rate for WRAP participants;
- c. The net uncollectible rate for residential customers;
- d. The net uncollectible rate for WRAP participants;
- e. The average residential bill for current service;
- f. The average residential bill for WRAP participants for current service;
- g. The average residential monthly arrears (all residential customers);
- h. The average residential monthly arrears (WRAP participants);
- i. The number of residential liens for unpaid water bills (all residential customers);
- j. The number of residential liens for unpaid water bills (WRAP participants);
- k. The dollar amount of unpaid residential bills subject to lien (all residential customers);
- l. The dollar amount of unpaid residential bills subject to lien (WRAP participants).

**Response:** Please note that there are no reports available that capture this data.

**Response Provided By:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

PA-RDC-59. Reference: Davis. Testimony, page 4. Provide the complete set of Census data and PUMS data downloaded or otherwise secured in developing lost revenue estimates.

**Response:** The electronic version of the data, Response PA-RDC-59 will be provided upon request in CD form.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

PA-RDC-60. Reference: Davis. Testimony, pages 4-6. Provide the workpapers, including all electronic files with all formulae active and intact:

- a. Underlying Table 1;
- b. Underlying Table 2;
- c. Underlying Table 3.

**Response:** The electronic model Response PA-RDC-60 will be provided upon request in CD form.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

PA-RDC-61. Reference: Davis. Testimony, page 5: Provide a complete active worksheet in electronic format with all formula active and intact, which shows the complete calculations underlying Table 2 for each Tier, including but not necessarily limited to:

- a. Average usage;
- b. Average non-discounted bill (including the bill derivation);
- c. Number of program participants;
- d. Average discounted bill;
- e. Average shortfall between the non-discounted bill and the discounted bill;
- f. The current revenue expected to be collected (bill reduced by the applicable blended collection factor);
- g. The blended collection factor applied;
- h. The average shortfall between the bill at the discounted rate and the revenue expected to be collected reduced by the applicable blended collection factor;
- i. The affordability target in terms of a bill as a percentage of income;
- j. The number of customers not achieving the affordability target;
- k. The mean dollar amount by which the customers not achieving the affordability target fall short of achieving the affordability target.

**Response:** The answers to these questions may be easily derived from the electronic model provided in Response PA-RDC-60. As noted previously in PA-RDC-57, no costs associated with the blended collection factor/delinquency were included in the cost of service rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-62. Reference: Davis. Testimony, page 5. For each Tier presented in Table 2, provide:

- a. The total number of water customers;
- b. The distribution of water customers by quintile of usage;
- c. The distribution of water customers by quintile of income.

If some percentile other than quintiles has been used to determine the distribution of customers by usage and income within each tier, the response should provide that distribution and identify the percentile used.

**Response:** The electronic model provided in Response PA-RDC-60 will show the water customers by Federal Poverty Level program tier and residential usage by quartile.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-63. Reference: Davis. Testimony, page 5. Provide the results of all of the “multiple trials” and the resulting plots of lost revenue referenced. Separately provide the complete distribution of possible lost revenue outcomes. Provide these simulations broken down into as many simulations as existed (e.g., by usage level within each income level).

**Response:** A report that details the results of the multiple trials from the Oracle software will be provided upon request in CD form.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

PA-RDC-64. Reference: Davis. Testimony, page 4-6. Provide Table 1, Table 2, and Table 3 using nine tiers for below 250% of Poverty, as follows: 0 – 25%; 26 – 50%; 51 – 75%; 76 – 100%; 101 - 125%; 126 – 150%; 151 – 175%; 176 – 200%; and 200% or more.

**Response:** Analysis was performed in accordance to the tiers specified in the City Ordinance 140607-AA.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-65. Reference: Davis. Testimony, page 5. Provide Table 2:

- a. Assuming a minimum bill as set forth in Table 3;
- b. Assuming no minimum bill (if different from the existing Table 3).

**Response:** Table 2 shows a blended average discount on current charges and a blended average residential bill with the cumulative resulting lost revenue. There is no embedded assumption as to individual consumption, number of accounts that may pay a minimum bill, or the portion of a bill allocated to delinquent balances.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-66. Reference: Davis. Testimony, page 5. Provide Table 2 broken down into the income tiers and usage levels set forth in Table 3. Include the complete calculation with all formulae active and intact.

**Response:** The electronic model provided in Response PA-RDC-60 will provide this information.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

PA-RDC-67. Reference: Davis. Testimony, page 5. Provide the subscription rate by income tier at which the projected lost revenue level would cover 80% of the forecasted outcomes. In addition, from all new and existing rate affordability programs in jurisdictions listed in your testimony, in addition to all programs provided in response to Data Requests 48 and 49, please list the jurisdictions in which subscription rate equaled or exceeded the subscription rate the City chose in order to project lost revenue at a level that would cover 80% of forecast outcomes.

**Response:** Refer to response provided for PA-RDC-63.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-68. Reference: Davis. Testimony, page 6. For Table 3, provide by Tier:

- a. The average bill without a minimum bill;
- b. The affordability target underlying each Tier;
- c. The burden imposed assuming a minimum bill;

**Response:** The electronic model provided in Response PA-RDC-60 will allow for calculation of answers to these questions.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

PA-RDC-69. Reference: Davis. Testimony, page 6. Your testimony states that “should actual subscription be higher, the revenue could be covered by a manageable transfer from RSF.” Provide a detailed description of the use of revenue collected for the Affordability Program if the subscription rate is lower and the City over-collects program costs.

**Response:** See, PWD Exhibit 4 (SI- 31), The Official Statement, page number nine, titled “Priority and Application of Project Revenues.”

**Response Provided By:** Melissa LaBuda, Philadelphia Water Department

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-70. Please supplement the City's response to PA-RDC-2 by providing any and all reports, including the most recent draft(s), prepared by Schumaker & Company addressing customer service issues or other issues relevant to the Management Audit.

**Response:** The question contains statements that are incorrect. The report was prepared by Schumaker & Company and relates to customer service issues. The report will be provided upon request in CD form.

**Response Provided By:** Andre Dasent

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

PA-RDC-71. Reference: McCarty. Testimony, page 4. Please describe the standard that PWD applies in calculating the revenue it is “entitled” as a result of:

- a. Customer meter inaccuracies;
- b. Billing errors;
- c. Unauthorized consumption.

**Response:** PWD is entitled to receive the correct amount as adjusted for any over or under billing. As a not for profit entity, all cost of the system must be covered by rates of the system.

**Response Provided By:** Debra McCarty, Philadelphia Water Department

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-72. Reference: McCarty. Testimony, page 4-5. Provide the total amount that has been spent on PWD's Revenue Protection Program since 2000.

**Response:** Please note there are no reports available that capture this data.

**Response Provided By:** Debra McCarty, Philadelphia Water Department

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

PA-RDC-73. Reference: McCarty. Testimony, page 4-5. Provide the annual budget for PWD's Revenue Protection Program for each year since 2000.

**Response:** Please note there are no reports available that capture this data.

**Response Provided By:** Debra McCarty, Philadelphia Water Department

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
PRODUCTION OF DOCUMENTS**

PA-RDC-74. Reference: McCarty. Testimony, page 5. Provide the workpapers, including all electronic files with all formulae active and intact, and all calculations underlying the table at page 5 (Water Department's Revenue Protection Program).

**Response:** This information is will be provided upon request in CD form for FY 2000-2015.

**Response Provided By:** Debra McCarty, Philadelphia Water Department