

**BEFORE THE PHILADELPHIA WATER, SEWER AND STORM WATER
RATE BOARD**

In the Matter of a Proposed Rate Increase in :
Water, Sewer and Storm Water Rates : **FY 2019-2021 Rates**

**Public Advocate's Interrogatories & Requests for Production of Documents
Set III**

- PA-III-1. Reference: PWD Response to PA-ADV-6. Please explain why:
- a. There are no collections in FY17 and FY18 for bills rendered in FY16.
 - b. There are no collections in FY17 for bills rendered in FY15.
- PA-III-2. Reference: PWD Response to PA-ADV-91. Please provide all referenced reports (including periodic reports and “ad hoc” reports) that have been prepared since January 1, 2017.
- PA-III-3. Reference: PWD Response to PA-ADV-93(c). The response to 93(c) appears to be a duplicate to the response to PA-ADV-93(a). Please provide a response that responds to 93(c).
- PA-III-4. Reference: PWD Response to PA-ADV-93(b). Confirm or deny. PWD does not use any community-based organizations for outreach for the Tiered Affordability Program (“TAP”). If denied, please indicate all CBOs with which PWD has contracted and provide a copy of each contract.
- PA-III-5. Reference: PWD Response to PA-ADV-93(b). Confirm or deny. Each of the contracts listed in paragraphs (i) through (vi) are with entities commonly referred to as “mass media.” If denied, please provide a detailed explanation of the basis for the denial.
- PA-III-6. Reference: PWD Response to PA-ADV-93(b). Please provide:
- a. By month since January 2017, the budgets for media purchases with each of the media identified in paragraphs (i) through (vi).
 - b. Separated by each of the individual media identified in paragraphs (i) through (vi), the services purchased through those purchases including a detailed explanation of the frequency and location of advertising.
 - c. The estimated budgets for each of the individual media identified in paragraphs (i) through (vi) from January 2018 through July 2019.

d. Separated by each of the individual media identified in paragraphs (i) through (vi), the services expected to be purchased including a detailed explanation of the frequency and location of advertising.

PA-III-7. Reference: PWD Response to PA-ADV-93(b). Please provide the budget for expected contracts or fees for service directed toward Community-Based Organizations from January 2018 through June 2019 for purposes of providing outreach for the TAP.

PA-III-8. Please provide a list of all Pennsylvania municipal water utilities, including a municipal department authority or other entity operating or managing municipal water service, not regulated by the Pennsylvania PUC, that collect public fire protection costs through water rates and/or charges. If no such list exists within the custody or control of PWD or its consultants, please so indicate.

PA-III-9. Please provide a copy of any correspondence, memo, directive, e-mail, or other written document of any nature that suggests, asks, directs, or otherwise comments on whether public fire protection service should be collected through water rates/charges rather than through property taxes in Philadelphia.

PA-III-10. Reference: PWD Response to PA-ADV-47/48: Please provide a copy of the referenced Miscellaneous Charges Study.

PA-III-11. Reference: PWD Response to PA-ADV-47/48/49: With reference to the comment that there will be a gradual adjustment in fees to more fully reflect costs, please provide, for each such fee for which a “gradual adjustment” is expected, the anticipated “gradual adjustment,” by year, beginning in the most recent Fiscal Year in which such a “gradual adjustment” was made and continuing for the next ten years. For each such fee, and by year, provide:

- a. The expected dollar adjustment in the fee; and
- b. The expected percentage adjustment in the fee.

PA-III-12. Reference: PWD Response to PA-ADV-57: Please explain in detail the impact, if any, of placing a lien on property for unpaid water bills (including wastewater and storm water in this use of the term “water”) on the late fee imposed on the unpaid balance made subject to the lien.

PA-III-13. Reference: PWD Response to PA-ADV-57: Please explain in detail the interest imposed on liens placed on property for unpaid water bills (including wastewater and storm water in this use of the term “water”) outside of, or in addition to, the

PWD late fee imposed. To the extent that a judicial interest rate is imposed, in other words, please so indicate, and indicate the rate of interest imposed.

PA-III-14. Reference: PWD Response to PA-ADV-57/59: By month since January 2017, please provide (with the term “water” intended to include both wastewater and storm water also):

- a. The dollars of liens newly placed on property for unpaid water bills;
- b. The number of dollars of liens newly placed on property for unpaid water bills;
- c. The total dollars of liens held for unpaid water bills;
- d. The total number of liens held for unpaid water bills;
- e. The total number of liened accounts for unpaid water bills on which PWD’s late payment charge was imposed;
- f. The total dollars of late payment fees collected from liened accounts for unpaid water bills.

PA-III-15. Reference: PWD response to PA-ADV-86. Please provide by month for each month July 2017 to present, the total number of TAP participants with preprogram arrearages.

PA-III-16. Reference: PWD Response to PA-ADV-86. Please explain how:

- a. In August 2017, there were new TAP enrollees of 1,182 but a total TAP participation of only 763.
- b. In September 2017, there were 524 new enrollees but the total TAP participation rate increased from 763 to 1,494 (731 increase).

PA-III-17. Reference: PWD Response to PA-ADV-86. Please provide the number of WRAP participants not participating in TAP from January 2017 to present.

PA-III-18. Reference: PWD Response to PA-ADV-86. By month for the months of January 2017 to present, please provide the number of WRAP participants:

- a. Applying for TAP;
- b. Applying for TAP but denied entrance into TAP.
- c. Separately indicate the number of denials by the reason for the denial.

PA-III-19. Reference: PWD Response to PA-ADV-86. Confirm or deny. Column F and Column G would equal bills at standard residential rates if the customers to whom TAP bills were rendered had not been enrolled in TAP. If denied, please provide a detailed explanation of the basis for the denial.

PA-III-20. Reference: PWD Response to PA-ADV-86. Confirm or deny. A residential customer, in any given month, is either a TAP participant or is not a TAP participant. The population of customers receiving a TAP bill and the population not receiving a TAP bill in any given month is mutually exclusive. If denied, please provide a detailed explanation of the basis for the denial.

PA-III-21. Reference: PWD Response to PA-ADV-86. Confirm or deny. In November 2017,

- a. The \$632.75 is out of the \$13,447.11.
- b. The \$315.59 is out of the \$13,447.11.
- c. The \$315.59 is out of the \$25,207.86.

If denied, please provide a detailed explanation of the basis for the denial.

PA-III-22. Reference: PWD Response to PA-ADV-86. Confirm or deny. The Column (k) numbers are unduplicated within each individual month. Thus, for example, in Month 11, 19 is not a subset of 40. If denied, please provide a detailed explanation of the basis for the denial and provide a detailed explanation of the interrelationship between the (k) columns in any given month.

PA-III-23. Reference: PWD Response to PA-ADV-86. If the Column (k) numbers are not unduplicated, please provide a detailed explanation of how the 19 (in 61-90) can be smaller than the 40 (in 91 – 120). Indicate, in other words, how there can be fewer customers with 61-90 day arrears than there are customers with 91-120 day arrears.

PA-III-24. Reference: PWD Response to PA-ADV-86. Confirm or deny. The dollars set forth in each age bucket (Column I) are associated with the accounts set forth in each bucket of the same age (Column K). Thus, for example, for November (month 11), the \$632.75 (91-120 days) are the arrears associated with the 40 accounts (91 – 120 days). If denied please provide a detailed explanation of the basis for the denial and separately indicate the relationship between the numbers of accounts by age bucket and the dollars of arrears by age bucket.

PA-III-25. Reference: PWD Response to PA-ADV-86. Please explain how the sum of total arrears (all ages) (Column I) can exceed the sum of TAP bills issued (Column C).

PA-III-26. Reference: PWD Response to PA-ADV-86. Please explain how the sum of the arrears in the 0 – 30 day age bucket can exceed the sum of TAP bills issued (Column f) minus the sum of TAP payments. Consider that the sum of TAP bills

equals \$141,312.72. The sum of TAP payments equals \$79,246.22. The difference between TAP bills and TAP payments is thus \$62,066.50. However, the sum of the arrearages by aging bucket is \$80,408.87.

PA-III-27. Reference: PWD Response to PA-ADV-86. Confirm or deny. The dollars of a TAP bill cannot appear in the 0 – 30 day age bucket in more than one month. If denied, please provide a detailed explanation of the basis for the denial.

PA-III-28. Reference: PWD Response to PA-ADV-86. Please explain how the sum of the participants by aging bucket can exceed the number of TAP bills issue din each month but August. Specifically explain:

- a. How in September, there can be 1,435 TAP bills but 1,623 TAP accounts by aging bucket;
- b. How in October, there can be 1,992 TAP bills but 2,183 TAP accounts by aging bucket;
- c. How in November, there can be 2,624 TAP bills but 2,984 TAP accounts by aging bucket.

PA-III-29. Reference: PWD Response to PA-ADV-86. Confirm or deny. In each aging bucket, the number of accounts or dollar figure in one month is a subset of the number of accounts or dollar figure for the immediately preceding month and immediately preceding aging bucket. If denied, please provide a detailed explanation of the basis for the denial.

PA-III-30. Reference: PWD Response to PA-ADV-86. Confirm or deny:

- a. In the number of accounts (Column k) in November, the 40 (91-120) is a subset of the 79 (61-90 for October).
- b. In the number of accounts for October, the 79 (61 – 90) I a subset of 189 (31-60 for September).
- c. For dollars, the \$632.72 (91 -120 in November) is a subset of \$1,220.35 (61 – 90 for October).
- d. The \$1,220.35 (61 – 90 for October) is a subset of the \$3,092.23 (31 – 60 for September).

If denied, please provide a detailed explanation of the basis for the denial. Separately provide an explanation of the relationship between the aging buckets of arrears in one month (number of accounts and dollars of arrears separately if the explanation is different) relate to the aging buckets of arrears in the immediately preceding month.

PA-III-31. Reference: PWD Response to PA-ADV-52. Confirm or deny. The primary focus of comments in Pennsylvania PUC Docket M-2015-2518883 was on the need for or impact of revenue decoupling on the promotion of efficiency investments. If denied, please provide a detailed explanation of the basis for the denial.

PA-III-32. Reference: PWD Response to PA-ADV-52. Please provide a copy of each set of comments and/or reply comments filed by a Pennsylvania water utility, or other stakeholders that referenced water/wastewater ratemaking in their comments/reply comments, in Pennsylvania PUC Docket M-2015-2518883 that was reviewed by PWD in making its assertion that its decision was "based on the Department's review of written comment[s] in the PUC proceeding" (referencing PUC Docket M-2015-2518883).