

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

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5 **PA-III-1.**       REFERENCE: PWD RESPONSE TO PA-ADV-6. PLEASE EXPLAIN WHY:  
6                                   A. THERE ARE NO COLLECTIONS IN FY17 AND FY18 FOR BILLS  
7                                   RENDERED IN FY16.  
8                                   B. THERE ARE NO COLLECTIONS IN FY17 FOR BILLS RENDERED IN  
9                                   FY15.

10 **RESPONSE:**

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12                                   PA-ADV-6 is the Payment Patterns report for FY2016. It includes all billing system  
13                                   data as of June 30, 2016. As such, there is no reported activity during FY2017 or  
14                                   FY2018, which occur after the date of this report.

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16 **RESPONSE PROVIDED BY:**   Raftelis Financial Consultants, Inc.  
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1 **PA-III-2.** REFERENCE: PWD RESPONSE TO PA-ADV-91. PLEASE PROVIDE ALL  
2 REFERENCED REPORTS (INCLUDING PERIODIC REPORTS AND “AD  
3 HOC” REPORTS) THAT HAVE BEEN PREPARED SINCE JANUARY 1, 2017.

4 **RESPONSE:**

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6 Daily, weekly, and quarterly reports are provided as PA-III-2\_Attachment. Ad hoc  
7 reports are created as needed by a variety of TAP users through a CAMP software user  
8 interface.

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12 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

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**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).

**RESPONSE:**

The City did not enter into any contractual services for intake devoted exclusively to TAP.

**RESPONSE PROVIDED BY:** Michelle Bethel and RaVonne Muhammad, Water Revenue Bureau

1 **PA-III-4.** REFERENCE: PWD RESPONSE TO PA-ADV-93(B). CONFIRM OR DENY.  
2 PWD DOES NOT USE ANY COMMUNITY-BASED ORGANIZATIONS FOR  
3 OUTREACH FOR THE TIERED AFFORDABILITY PROGRAM (“TAP”). IF  
4 DENIED, PLEASE INDICATE ALL CBOS WITH WHICH PWD HAS  
5 CONTRACTED AND PROVIDE A COPY OF EACH CONTRACT.  
6

7 **RESPONSE:**

8 Denied. PWD works with Community Based Organizations, civics, City Council and  
9 other neighborhood based organizations on TAP outreach and other PWD programs.  
10 This is a major component of Public Affairs’ overall communications strategy.  
11 However, we do not formally contract with these organizations.  
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16 **RESPONSE PROVIDED BY:** Joanne Dahme, Philadelphia Water Department  
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**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.

**RESPONSE:**

Confirmed with the exception of SEPTA which is not a mass media entity.

**RESPONSE PROVIDED BY:** Joanne Dahme, Philadelphia Water Department

1 **PA-III-6.** REFERENCE: PWD RESPONSE TO PA-ADV-93(B). PLEASE PROVIDE:  
2 A. BY MONTH SINCE JANUARY 2017, THE BUDGETS FOR MEDIA  
3 PURCHASES WITH EACH OF THE MEDIA IDENTIFIED IN PARAGRAPHS  
4 (I) THROUGH (VI).  
5 B. SEPARATED BY EACH OF THE INDIVIDUAL MEDIA IDENTIFIED IN  
6 PARAGRAPHS (I) THROUGH (VI), THE SERVICES PURCHASED  
7 THROUGH THOSE PURCHASES INCLUDING A DETAILED  
8 EXPLANATION OF THE FREQUENCY AND LOCATION OF  
9 ADVERTISING.  
10 C. THE ESTIMATED BUDGETS FOR EACH OF THE INDIVIDUAL MEDIA  
11 IDENTIFIED IN PARAGRAPHS (I) THROUGH (VI) FROM JANUARY 2018  
12 THROUGH JULY 2019.  
13 D. SEPARATED BY EACH OF THE INDIVIDUAL MEDIA IDENTIFIED IN  
14 PARAGRAPHS (I) THROUGH (VI), THE SERVICES EXPECTED TO BE  
15 PURCHASED INCLUDING A DETAILED EXPLANATION OF THE  
16 FREQUENCY AND LOCATION OF ADVERTISING.

17 **RESPONSE:**

- 18 A. There is not an exclusive advertising budget for TAP.  
19 B. The Department advertised on SEPTA via a contract with Intersection (the  
20 contractor who handles advertising with SEPTA) at a cost of \$70,845 in two 6-week  
21 promotions with:  
22
  - 23 • 40 Bus shelter posters
  - 24 • 75 Subway platform posters
  - 25 • 75 King size bus exterior posters
  - 26 • 250 Subway interior posters
  - 27 • 500 Bus interior posters  
28

1 Radio:

2 Radio One – We advertised on 3 stations they own, Boom 103.9, 100.3 WRNB,  
3 and Praise 107.9. The ads ran for 6 weeks, starting June 5th, ending in the middle  
4 of July. The total cost of this was \$9,720.

5  
6 iHeartRadio – We advertised on two of their local stations, Q102 and Power 99.  
7 The ads ran for 6 weeks, starting on June 5th, ending in the middle of July. The  
8 total cost of this was \$10,400.

9  
10 KYW1060 – We advertised with KYW1060 for 4 weeks, starting the last week of  
11 June, and the first 3 weeks of July. The total cost of these ads was \$5000.85.

12  
13 Newspaper:

14 Metro – 6/22, 6/26, 6/28, 7,5, 7/6, 7/10, 7/12, 7/17, 7/19, 7/24, 7/25, 7/26. Total  
15 cost, \$11,400

16  
17 Tribune – Ads began running 3 times a week for 6 weeks, total of 18 ads placed.  
18 Total cost, \$9,366

19  
20 Al Dia – Ads ran for 6 weeks, beginning the week of June 5th. Total cost, \$9,072.

21  
22 c) PWD does not have any plans for TAP paid advertising in 2018 at this time. This  
23 spring we will be doing customer survey work on TAP and other assistance programs  
24 to determine how people are learning about the program to confirm the best allocation  
25 of funding for public engagement and outreach around TAP.

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27 d) See response to PA-III-6 (c) above.  
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1 **RESPONSE PROVIDED BY:** Joanne Dahme, Philadelphia Water Department

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**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.

**RESPONSE:**

PWD does not contract with Community Based Organizations.

**RESPONSE PROVIDED BY:** Joanne Dahme, Philadelphia Water Department

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**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.

**RESPONSE:**

No such list is available.

**RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC

1 **PA-III-9.** PLEASE PROVIDE A COPY OF ANY CORRESPONDENCE, MEMO,  
2 DIRECTIVE, E-MAIL, OR OTHER WRITTEN DOCUMENT OF ANY  
3 NATURE THAT SUGGESTS, ASKS, DIRECTS, OR OTHERWISE  
4 COMMENTS ON WHETHER PUBLIC FIRE PROTECTION SERVICE  
5 SHOULD BE COLLECTED THROUGH WATER RATES/CHARGES RATHER  
6 THAN THROUGH PROPERTY TAXES IN PHILADELPHIA.

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8 **RESPONSE:**

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10 Please note that the Department has filed its Objection to this interrogatory and request  
11 for production of documents.

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16 **RESPONSE PROVIDED BY:** Melissa La Buda, Philadelphia Water Department

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**PA-III-10.** REFERENCE: PWD RESPONSE TO PA-ADV-47/48: PLEASE PROVIDE A COPY OF THE REFERENCED MISCELLANEOUS CHARGES STUDY.

**RESPONSE:**

Please refer to response attachment PA-III-10.pdf.

**RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC

1 **PA-III-11.** REFERENCE: PWD RESPONSE TO PA-ADV-47/48/49: WITH REFERENCE  
2 TO THE COMMENT THAT THERE WILL BE A GRADUAL ADJUSTMENT  
3 IN FEES TO MORE FULLY REFLECT COSTS, PLEASE PROVIDE, FOR  
4 EACH SUCH FEE FOR WHICH A “GRADUAL ADJUSTMENT” IS  
5 EXPECTED, THE ANTICIPATED “GRADUAL ADJUSTMENT,” BY YEAR,  
6 BEGINNING IN THE MOST RECENT FISCAL YEAR IN WHICH SUCH A  
7 “GRADUAL ADJUSTMENT” WAS MADE AND CONTINUING FOR THE  
8 NEXT TEN YEARS. FOR EACH SUCH FEE, AND BY YEAR, PROVIDE:  
9 A. THE EXPECTED DOLLAR ADJUSTMENT IN THE FEE; AND  
10 B. THE EXPECTED PERCENTAGE ADJUSTMENT IN THE FEE.

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12 **RESPONSE:**

13 The miscellaneous fee study was performed for the three year period FY 2019-FY  
14 2021(Study Period), hence adjustment amounts can be provided for FY 2019, FY 2020  
15 and FY 2021.

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17 Please refer to response attachment PA-III-11.pdf. The attached table provides the dollar  
18 adjustments in columns 1, 2, and 3 and the percentage adjustments in columns 4, 5 and  
19 6 for those miscellaneous fees for which “Gradual Adjustments” are proposed.

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23 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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**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.

**RESPONSE:**

There is no impact of placing a lien on property for unpaid water bills on the penalty for late payment imposed on the unpaid balance made subject to the lien. The penalty for late payment accrues until the unpaid balance is paid.

**RESPONSE PROVIDED BY:** Michelle Bethel, Water Revenue Department

1 **PA-III-13.** REFERENCE: PWD RESPONSE TO PA-ADV-57: PLEASE EXPLAIN IN  
2 DETAIL THE INTEREST IMPOSED ON LIENS PLACED ON PROPERTY  
3 FOR UNPAID WATER BILLS (INCLUDING WASTEWATER AND STORM  
4 WATER IN THIS USE OF THE TERM “WATER”) OUTSIDE OF, OR IN  
5 ADDITION TO, THE PWD LATE FEE IMPOSED. TO THE EXTENT THAT A  
6 JUDICIAL INTEREST RATE IS IMPOSED, IN OTHER WORDS, PLEASE SO  
7 INDICATE, AND INDICATE THE RATE OF INTEREST IMPOSED.

8 **RESPONSE:**

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10 The City does not impose interest on liens placed on property for unpaid water bills  
11 outside of, or in addition to, the penalty for late payment.  
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27 **RESPONSE PROVIDED BY:** Michelle Bethel, Water Revenue Bureau  
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1 **PA-III-14.** REFERENCE: PWD RESPONSE TO PA-ADV-57/59: BY MONTH SINCE  
2 JANUARY 2017, PLEASE PROVIDE (WITH THE TERM “WATER”  
3 INTENDED TO INCLUDE BOTH WASTEWATER AND STORM WATER  
4 ALSO):  
5 A. THE DOLLARS OF LIENS NEWLY PLACED ON PROPERTY FOR  
6 UNPAID WATER BILLS;  
7 B. THE NUMBER OF DOLLARS OF LIENS NEWLY PLACED ON  
8 PROPERTY FOR UNPAID WATER BILLS;  
9 C. THE TOTAL DOLLARS OF LIENS HELD FOR UNPAID WATER BILLS;  
10 D. THE TOTAL NUMBER OF LIENS HELD FOR UNPAID WATER BILLS;  
11 E. THE TOTAL NUMBER OF LIENED ACCOUNTS FOR UNPAID WATER  
12 BILLS ON WHICH PWD’S LATE PAYMENT CHARGE WAS IMPOSED;  
13 F. THE TOTAL DOLLARS OF LATE PAYMENT FEES COLLECTED FROM  
14 LIENED ACCOUNTS FOR UNPAID WATER BILLS.

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16 **RESPONSE:**

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18 See response attachment PA-III-14 Lien Detail Report. Please note that for subsection  
19 (B) we have provided the number of liens as opposed to “the number of dollars of  
20 liens.” Please note that there are no reports available that capture the data for  
21 subsections (C) and (D) historically, but the City can provide the data requested for the  
22 month end of January 2018. Additionally, there are no reports available that capture  
23 data for subsections (E) and (F).

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27 **RESPONSE PROVIDED BY:** Michelle Bethel, Water Revenue Bureau  
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1 **PA-III-15.** REFERENCE: PWD RESPONSE TO PA-ADV-86. PLEASE PROVIDE  
 2 BY MONTH FOR EACH MONTH JULY 2017 TO PRESENT, THE  
 3 TOTAL NUMBER OF TAP PARTICIPANTS WITH PREPROGRAM  
 4 ARREARAGES.

5 **RESPONSE:**

6  
 7 The following table and explanatory text are provided in response to the question.

Month	Year	(a) Number of TAP Participants Having Preprogram Arrears at the Time of Enrollment	(b) Aggregate Dollars of Preprogram Arrears at the Time of Enrollment for TAP Participants
7	2017	-	\$ -
8	2017	719	\$ 2,747,995.45
9	2017	1,364	\$ 4,978,140.04
10	2017	1,906	\$ 6,661,080.65
11	2017	2,512	\$ 8,679,118.38
12	2017	3,759	\$ 13,097,555.63
1	2018	5,025	\$ 17,540,973.87
2	2018	5,932	\$ 20,808,472.54

16  
 17 (a) Number of TAP Participants Having Preprogram Arrears at the Time of  
 18 Enrollment – This is the count of TAP Participants (distinct account keys issued a bill  
 19 during the month in question as determined for PA-ADV-86 “(b) Total TAP  
 20 Participants”) that had Arrears > 0 at the time of enrollment (as determined for PA-  
 21 ADV-86 “(c) Number of TAP New Enrollees Having Preprogram Arrears at the Time  
 22 of Enrollment”).

23  
 24 (b) Aggregate Dollars of Preprogram Arrears at the Time of Enrollment for TAP  
 25 Participants – This is the sum of arrears of enrollees identified in PA-III-15(a).

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 28 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-III-16.** REFERENCE: PWD RESPONSE TO PA-ADV-86. PLEASE EXPLAIN HOW:

2 A. IN AUGUST 2017, THERE WERE NEW TAP ENROLLEES OF 1,182 BUT  
3 A TOTAL TAP PARTICIPATION OF ONLY 763.

4 B. IN SEPTEMBER 2017, THERE WERE 524 NEW ENROLLEES BUT THE  
5 TOTAL TAP PARTICIPATION RATE INCREASED FROM 763 TO 1,494 (731  
6 INCREASE).

7  
8 **RESPONSE:**

9 As described on page 113, lines 11 through 17 of the response to PA-ADV-86, TAP  
10 participation is defined for a particular customer in a particular month if that customer  
11 is enrolled in TAP when a bill is issued. If a customer receives a regular bill in early  
12 August 2017, is enrolled in the program in late August 2017, and receives their next  
13 bill in early September 2017, this customer would be counted among New TAP  
14 Enrollees (PA-ADV-86(a)) in August, and among Total TAP Participants (PA-ADV-  
15 86(d)) in September. September Total TAP Participants (PA-ADV-86(d)) includes all  
16 customers who were enrolled in TAP prior to receiving their September bill.

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27 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-17.** REFERENCE: PWD RESPONSE TO PA-ADV-86. PLEASE PROVIDE  
2 THE NUMBER OF WRAP PARTICIPANTS NOT PARTICIPATING IN  
3 TAP FROM JANUARY 2017 TO PRESENT.  
4

5 **RESPONSE:**

6 The table below shows the number of WRBCC participants not participating in TAP:

7

Month	Year	WRBCC Participants
1	2017	6,767
2	2017	7,139
3	2017	7,025
4	2017	6,647
5	2017	6,532
6	2017	6,559
7	2017	7,031
8	2017	6,264
9	2017	6,191
10	2017	5,847
11	2017	5,177
12	2017	4,660
1	2018	3,690
2	2018	3,483

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27 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-18.** REFERENCE: PWD RESPONSE TO PA-ADV-86. BY MONTH FOR THE  
2 MONTHS OF JANUARY 2017 TO PRESENT, PLEASE PROVIDE THE  
3 NUMBER OF WRAP PARTICIPANTS:  
4 A. APPLYING FOR TAP;  
5 B. APPLYING FOR TAP BUT DENIED ENTRANCE INTO TAP.  
6 C. SEPARATELY INDICATE THE NUMBER OF DENIALS BY THE  
7 REASON FOR THE DENIAL.  
8

9 **RESPONSE:**

10 This information is included as PA-III-18\_Attachment. PA-III-18(a) counts the number of  
11 customer assistance applications received from WRAP participations in a given month. PA-III-  
12 18(b) counts the number of customer assistance applications from WRBCC participants not  
13 enrolled in TAP in a particular month, regardless of when that application was submitted.  
14 Customers may not be enrolled in TAP for any of the following reasons, which are shown in  
15 PA-III-18(c):

- 16 - Applicant was instead enrolled in a more affordable alternative than TAP. Alternatives  
17 are:
- 18 ○ Citizen Discounted Bill + Extended Payment Agreement (LONGSTD)
  - 19 ○ Senior Citizen Discounted Bill\*
  - 20 ○ Regular Bill + Extended Payment Agreement (LONGSTD)
  - 21 ○ Regular Bill\*
  - 22 ○ WRBCC Agreement

23 \* May include standard payment agreement.

- 24 - Application was denied for one of the following reasons:
- 25 ○ Failed to meet Income and Residency Guidelines
  - 26 ○ Failed to meet Income Guidelines (no Special Hardship)
  - 27 ○ Failed to meet Residency Guidelines
  - 28 ○ Installation Type Not Eligible for TAP

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- Missing or Invalid Income or Residency Documentation
  - Missing application form information not submitted
  - Failed to prove Special Hardship
- Application had another outcome, listed below:
- Withdrawn by the customer
  - Data was transferred to a newer application for processing

**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

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**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.

**RESPONSE:**

Confirmed. Columns F and G together would equal water, sewer, and stormwater charges at standard residential rates if customers to whom TAP bills were rendered had not been enrolled in TAP. TAP or non-TAP bills could include charges other than current water, sewer, and stormwater charges.

**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-III-20.** REFERENCE: PWD RESPONSE TO PA-ADV-86. CONFIRM OR DENY. A  
2 RESIDENTIAL CUSTOMER, IN ANY GIVEN MONTH, IS EITHER A TAP  
3 PARTICIPANT OR IS NOT A TAP PARTICIPANT. THE POPULATION OF  
4 CUSTOMERS RECEIVING A TAP BILL AND THE POPULATION NOT  
5 RECEIVING A TAP BILL IN ANY GIVEN MONTH IS MUTUALLY  
6 EXCLUSIVE. IF DENIED, PLEASE PROVIDE A DETAILED EXPLANATION  
7 OF THE BASIS FOR THE DENIAL.  
8

9 **RESPONSE:**

10 Denied. Generally, the population of customers receiving a TAP bill and the population  
11 not receiving a TAP bill in any given month is mutually exclusive. However, on the  
12 occasion that a customer receives multiple bills in a single calendar month, a customer  
13 could receive a regular bill, be enrolled in TAP, and subsequently receive a TAP bill in  
14 the same month.  
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23 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc  
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1 **PA-III-21.** REFERENCE: PWD RESPONSE TO PA-ADV-86. CONFIRM OR DENY. IN  
2 NOVEMBER 2017,  
3 A. THE \$632.75 IS OUT OF THE \$13,447.11.  
4 B. THE \$315.59 IS OUT OF THE \$13,447.11.  
5 C. THE \$315.59 IS OUT OF THE \$25,207.86.  
6 IF DENIED, PLEASE PROVIDE A DETAILED EXPLANATION OF THE  
7 BASIS FOR THE DENIAL.  
8

9 **RESPONSE:**

10 Denied. Dollars of TAP Balance Aged X-Y days (PA-ADV-86(l)) totals unpaid TAP  
11 bills of that age for each TAP participant at the time that TAP participant's bill is  
12 rendered during the month. For example, the Dollars of TAP Balance Aged 91-120 days  
13 in November, \$632.75, may include unpaid bills that were originally rendered in July or  
14 August. Consider the following:

- 15 ○ A customer's unpaid TAP bill from July 31<sup>st</sup> is aged 93 days if that customer  
16 receives a bill on November 1<sup>st</sup>.
- 17 ○ A customer's unpaid TAP bill from August 22<sup>nd</sup> is aged 100 days if that customer  
18 receives a bill on November 30<sup>th</sup>.

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27 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-22.** REFERENCE: PWD RESPONSE TO PA-ADV-86. CONFIRM OR DENY. THE  
2 COLUMN (K) NUMBERS ARE UNDUPLICATED WITHIN EACH  
3 INDIVIDUAL MONTH. THUS, FOR EXAMPLE, IN MONTH 11, 19 IS NOT A  
4 SUBSET OF 40. IF DENIED, PLEASE PROVIDE A DETAILED  
5 EXPLANATION OF THE BASIS FOR THE DENIAL AND PROVIDE A  
6 DETAILED EXPLANATION OF THE INTERRELATIONSHIP BETWEEN  
7 THE (K) COLUMNS IN ANY GIVEN MONTH.  
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9 **RESPONSE:**

10 Confirmed  
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27 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-23.** REFERENCE: PWD RESPONSE TO PA-ADV-86. IF THE COLUMN (K)  
2 NUMBERS ARE NOT UNDUPLICATED, PLEASE PROVIDE A DETAILED  
3 EXPLANATION OF HOW THE 19 (IN 61-90) CAN BE SMALLER THAN THE  
4 40 (IN 91 – 120). INDICATE, IN OTHER WORDS, HOW THERE CAN BE  
5 FEWER CUSTOMERS WITH 61-90 DAY ARREARS THAN THERE ARE  
6 CUSTOMERS WITH 91-120 DAY ARREARS.

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8 **RESPONSE:**

9 Column (k) numbers are unduplicated.  
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27 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**PA-III-24.** REFERENCE: PWD RESPONSE TO PA-ADV-86. CONFIRM OR DENY. THE DOLLARS SET FORTH IN EACH AGE BUCKET (COLUMN L) 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.

**RESPONSE:**

Confirmed.

**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-III-25.** REFERENCE: PWD RESPONSE TO PA-ADV-86. PLEASE EXPLAIN HOW  
2 THE SUM OF TOTAL ARREARS (ALL AGES) (COLUMN L) CAN EXCEED  
3 THE SUM OF TAP BILLS ISSUED (COLUMN C).  
4

5 **RESPONSE:**

6 All bills issued (aged 0 days) are included in Dollars of TAP Balance Aged 0-30 Days.  
7 If a second bill is issued within 30 days of the first bill and the first TAP bill remains  
8 unpaid, it will again be counted among Dollars of TAP Balance Aged 0-30 Days of the  
9 relevant month.

10  
11 If a bill remains unpaid, assuming a 31-day billing cycle of one bill per month, that  
12 unpaid amount would show up initially during one month aged 0-30 days, the next  
13 month aged 31-60 days, the next month aged 61-90 days, the next month aged 91-120  
14 days, and the next month aged 121+ days.

15  
16 The sum of unpaid TAP balances (all ages) columns (l) can exceed the total of TAP bill  
17 issued column (c) for both of these reasons.  
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21 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-26.** REFERENCE: PWD RESPONSE TO PA-ADV-86. PLEASE EXPLAIN HOW  
2 THE SUM OF THE ARREARS IN THE 0 – 30 DAY AGE BUCKET CAN  
3 EXCEED THE SUM OF TAP BILLS ISSUED (COLUMN F) MINUS THE SUM  
4 OF TAP PAYMENTS. CONSIDER THAT THE SUM OF TAP BILLS EQUALS  
5 \$141,312.72. THE SUM OF TAP PAYMENTS EQUALS \$79,246.22. THE  
6 DIFFERENCE BETWEEN TAP BILLS AND TAP PAYMENTS IS THUS  
7 \$62,066.50. HOWEVER, THE SUM OF THE ARREARAGES BY AGING  
8 BUCKET IS \$80,408.87.

9  
10 **RESPONSE:**

11  
12 All bills issued (aged 0 days) are included in Dollars of TAP Balance Aged 0-30 Days.  
13 If a second bill is issued within 30 days of the first bill and the first TAP bill remains  
14 unpaid, both the first bill (aged 30 days) and the second bill (aged 0 days) will be counted  
15 among Dollars of TAP Balance Aged 0-30 Days of the relevant month.  
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24 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc  
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1 **PA-III-27.** REFERENCE: PWD RESPONSE TO PA-ADV-86. CONFIRM OR DENY. THE  
2 DOLLARS OF A TAP BILL CANNOT APPEAR IN THE 0 – 30 DAY AGE  
3 BUCKET IN MORE THAN ONE MONTH. IF DENIED, PLEASE PROVIDE A  
4 DETAILED EXPLANATION OF THE BASIS FOR THE DENIAL.

5 **RESPONSE:**

6  
7 Denied. All bills issued (aged 0 days) are included in Dollars of TAP Balance Aged 0-  
8 30 Days. If a second bill is issued within 30 days of the first bill and the first TAP bill  
9 remains unpaid, both the first bill (aged 30 days or less) and the second bill (aged 0  
10 days) will be counted among Dollars of TAP Balance Aged 0-30 Days of the relevant  
11 month.

12  
13 For example: Assume the first bill is issued in September 5th, and the second bill is  
14 issued 30 days later on October 5th. In September, the first bill (aged 0 days) will be  
15 counted among Dollars of TAP Balance Aged 0-30 Days. In October, the first bill (aged  
16 30 days) and the second bill (aged 0 days) will be counted among Dollars of TAP  
17 Balance Aged 0-30 Days.

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25 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc  
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1 **PA-III-28.** REFERENCE: PWD RESPONSE TO PA-ADV-86. PLEASE EXPLAIN HOW  
2 THE SUM OF THE PARTICIPANTS BY AGING BUCKET CAN EXCEED  
3 THE NUMBER OF TAP BILLS ISSUE DIN EACH MONTH BUT AUGUST.  
4 SPECIFICALLY EXPLAIN:

5 A. HOW IN SEPTEMBER, THERE CAN BE 1,435 TAP BILLS BUT 1,623 TAP  
6 ACCOUNTS BY AGING BUCKET;

7 B. HOW IN OCTOBER, THERE CAN BE 1,992 TAP BILLS BUT 2,183 TAP  
8 ACCOUNTS BY AGING BUCKET;

9 C. HOW IN NOVEMBER, THERE CAN BE 2,624 TAP BILLS BUT 2,984 TAP  
10 ACCOUNTS BY AGING BUCKET.

11  
12 **RESPONSE:**

13 All unique participants with bills issued (aged 0 days) are included in Number of  
14 Participants with TAP Balance aged 0-30 Days. In September, 1,435 TAP bills were  
15 issued, but only 1,434 unique TAP participants had bills aged 0-30 days. 189 TAP  
16 participants had unpaid TAP balances aged 31-60 days at the time of their September  
17 bill. The same customer could have unpaid TAP bills aged 0-30 and 31-60 days at the  
18 time of their September bill.

19  
20 In October, 1,992 TAP bills were issued, and 1,992 TAP participants had bills that were  
21 aged 0-30 days. 112 TAP participants had unpaid TAP balances aged 31-60 days at the  
22 time of their October bill. 79 TAP participants had unpaid TAP balances aged 61-90  
23 days at the time of their October bill. The same customer could have unpaid TAP bills  
24 aged 0-30, 31-60, and 61-90 days at the time of their October bill.

25  
26 In November, 2,624 TAP bills were issued, and because some participants were issued  
27 multiple bills during the month, 2,614 TAP participants had bills aged 0-30 days. 311  
28 TAP participants had unpaid TAP balances aged 31-60 days at the time of their

1 November bill. 19 TAP participants had unpaid TAP balances aged 61-90 days at the  
2 time of their November bill. 40 TAP participants who had unpaid TAP balances aged  
3 91-120 days at the time of their November bill. The same customer could have unpaid  
4 TAP bills aged 0-30, 31-60, 61-90, and 91-120 days at the time of their November bill.  
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15 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc  
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1 **PA-III-29.** REFERENCE: PWD RESPONSE TO PA-ADV-86. CONFIRM OR DENY. IN  
2 EACH AGING BUCKET, THE NUMBER OF ACCOUNTS OR DOLLAR  
3 FIGURE IN ONE MONTH IS A SUBSET OF THE NUMBER OF ACCOUNTS  
4 OR DOLLAR FIGURE FOR THE IMMEDIATELY PRECEDING MONTH  
5 AND IMMEDIATELY PRECEDING AGING BUCKET. IF DENIED, PLEASE  
6 PROVIDE A DETAILED EXPLANATION OF THE BASIS FOR THE DENIAL.  
7

8 **RESPONSE:**

9 Denied. The unpaid balances and count of participants with those balances are measured  
10 in relation to the time elapsed since the bill was rendered. Because not all months are  
11 the same length and because customers are not always billed exactly once on exactly the  
12 same day each month, one aging buckets is not necessarily a subset of the prior month's  
13 aging bucket. Refer to the response to PA-III-30 for an example.  
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27 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc  
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2 **PA-III-30.** REFERENCE: PWD RESPONSE TO PA-ADV-86. CONFIRM OR DENY:  
3 A. IN THE NUMBER OF ACCOUNTS (COLUMN K) IN NOVEMBER, THE 40  
4 (91-120) IS A SUBSET OF THE 79 (61-90 FOR OCTOBER).  
5 B. IN THE NUMBER OF ACCOUNTS FOR OCTOBER, THE 79 (61 – 90) I A  
6 SUBSET OF 189 (31-60 FOR SEPTEMBER).  
7 C. FOR DOLLARS, THE \$632.72 (91 -120 IN NOVEMBER) IS A SUBSET OF  
8 \$1,220.35 (61 – 90 FOR OCTOBER).  
9 D. THE \$1,220.35 (61 – 90 FOR OCTOBER) IS A SUBSET OF THE \$3,092.23  
10 (31 – 60 FOR SEPTEMBER).  
11 IF DENIED, PLEASE PROVIDE A DETAILED EXPLANATION OF THE  
12 BASIS FOR THE DENIAL. SEPARATELY PROVIDE AN EXPLANATION OF  
13 THE RELATIONSHIP BETWEEN THE AGING BUCKETS OF ARREARS IN  
14 ONE MONTH (NUMBER OF ACCOUNTS AND DOLLARS OF ARREARS  
15 SEPARATELY IF THE EXPLANATION IS DIFFERENT) RELATE TO THE  
16 AGING BUCKETS OF ARREARS IN THE IMMEDIATELY PRECEDING  
17 MONTH.

18  
19 **RESPONSE:**

20 Denied. The unpaid balances and count of participants with those balances are measured  
21 in relation to the time elapsed since the bill was rendered. Because not all months are  
22 the same length and because customers are not always billed exactly once on exactly the  
23 same day each month, one aging buckets is not necessarily a subset of the prior month's  
24 aging bucket.

25  
26 Consider this example: A customer is issued a TAP bill on September 3rd. That bill  
27 remains unpaid. The customer is issued another TAP bill on October 4th (31 days later)  
28 and another on December 2nd (60 days later). Because that first bill remains unpaid,

1 that customer is counted among the Number of Participants With TAP Balance Aged  
2 31-60 days in both October and November.

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5 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc  
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1 **PA-III-31.** REFERENCE: PWD RESPONSE TO PA-ADV-52. CONFIRM OR DENY. THE  
2 PRIMARY FOCUS OF COMMENTS IN PENNSYLVANIA PUC DOCKET M-  
3 2015-2518883 WAS ON THE NEED FOR OR IMPACT OF REVENUE  
4 DECOUPLING ON THE PROMOTION OF EFFICIENCY INVESTMENTS. IF  
5 DENIED, PLEASE PROVIDE A DETAILED EXPLANATION OF THE BASIS  
6 FOR THE DENIAL.

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8 **RESPONSE:**

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10 The primary focus of hearing, as indicated by the caption of the proceeding and as  
11 described by the PUC in its Notice to Interested Parties of December 31, 2015, and its  
12 Tentative Order entered on March 2, 2017, was “Alternative Ratemaking  
13 Methodologies.” The PUCs’ tentative order refers to revenue decoupling as one  
14 example of an alternative ratemaking methodology. See PUC Tentative Order, available  
15 on the PUC webpage at:  
16 [http://www.puc.state.pa.us/about\\_puc/consolidated\\_case\\_view.aspx?Docket=M-2015-](http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=M-2015-2518883)  
17 [2518883.](http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=M-2015-2518883)

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26 **RESPONSE PROVIDED BY:** Melissa LaBuda, Philadelphia Water Department  
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2 **PA-III-32.** REFERENCE: PWD RESPONSE TO PA-ADV-52. PLEASE PROVIDE A COPY  
3 OF EACH SET OF COMMENTS AND/OR REPLY COMMENTS FILED BY A  
4 PENNSYLVANIA WATER UTILITY, OR OTHER STAKEHOLDERS THAT  
5 REFERENCED WATER/WASTEWATER RATEMAKING IN THEIR  
6 COMMENTS/REPLY COMMENTS, IN PENNSYLVANIA PUC DOCKET M-  
7 2015-2518883 THAT WAS REVIEWED BY PWD IN MAKING ITS  
8 ASSERTION THAT ITS DECISION WAS "BASED ON THE DEPARTMENT'S  
9 REVIEW OF WRITTEN COMMENT[S] IN THE PUC PROCEEDING"  
10 (REFERENCING PUC DOCKET M-2015-2518883).

11 **RESPONSE:**

12  
13 The question contains an incorrect statement that the PWD's Response to PA-ADV-52  
14 referred to a decision. Rather, the response stated that based on the Department's review  
15 of written comments in the PUC proceeding, it does not appear that a consensus had  
16 been reached concerning alternative ratemaking methodologies. Comments reviewed in  
17 making this statement include the comments of: (1) the Office of Consumer Advocate  
18 (March 16, 2017; May 31, 2017; and July 31, 2017), (2) the Office of Small Business  
19 Advocate (March 16, 2017; May 31, 2017; and July 31, 2017), (3) PGW (May 31, 2017);  
20 (4) PECO (March 16, 2016, May 31, 2017 and July 31, 2017); (5) Aqua (May 31, 2017);  
21 (6) the National Association of Water Companies (March 15, 2016); and (7)  
22 Pennsylvania-American Water Company (July 31, 2017).

23  
24 These comments are available on the PUC webpage at:

25 [http://www.puc.state.pa.us/about\\_puc/consolidated\\_case\\_view.aspx?Docket=M-2015-](http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=M-2015-)  
26 [2518883.](http://www.puc.state.pa.us/about_puc/consolidated_case_view.aspx?Docket=M-2015-2518883)

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28 **RESPONSE PROVIDED BY:** Melissa LaBuda, Philadelphia Water Department