

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

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5 **PA-V-25.**       REFERENCE: PWD STATEMENT 7, PAGE 4: PLEASE PROVIDE BY  
6                                   MONTH THE NUMBER OF TAP ENROLLEES WHO HAVE INCOME  
7                                   GREATER THAN 150% OF FEDERAL POVERTY LEVEL BUT HAVE  
8                                   SPECIAL HARDSHIPS. SEPARATELY PROVIDE THE NUMBER OF EACH  
9                                   SPECIAL HARDSHIP ENROLLEE BY THE TYPE OF SPECIAL HARDSHIP  
10                                  FOUND.

11 **RESPONSE:**

12 As also shown in PA-V-40, as of January 13, 2018, 60 applications have been approved for TAP  
13 Special Hardship (>150% FPL). The breakdown by month and special hardship type is provided in  
14 *PA-V-25\_Attachment.*

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25 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**PA-V-26.** REFERENCE: PWD STATEMENT 7, PAGE 4: PLEASE PROVIDE BY MONTH THE NUMBER OF CUSTOMERS WHO APPLIED FOR TAP BUT WERE DENIED ENROLLMENT FOR BEING OVER-INCOME.

**RESPONSE:**

Please see *PA-V-41 Attachment* for the number of applications for which applicants were denied due to failure to meet Income Guidelines or Residency and Income Guidelines.

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

1 **PA-V-28.** REFERENCE: PWD STATEMENT 7, PAGE 4: PLEASE PROVIDE BY  
2 MONTH THE NUMBER OF CUSTOMERS WHO APPLIED FOR TAP BUT  
3 WERE DENIED FOR BEING OVER-INCOME WHO WERE INSTALLED  
4 ENROLLED IN A WRAP PROGRAM COMPONENT.

5 **RESPONSE:**

6 Please see *PA-V-41\_Attachment* for the number of applications for which applicants were not  
7 enrolled in TAP. As shown in the attachment, the applicants who were not enrolled in TAP include  
8 a subset of applicants who were:

- 9 • instead enrolled in a WRBCC agreement because it was a more affordable alternative, or
- 10 • the customer opted to reenroll in WRBCC, a component of WRAP.

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12 The table below highlights the number of WRBCC enrollments for customers with incomes above  
13 150% of the federal poverty guideline. Note that in July through September, no customers were  
14 denied for TAP for being over income but were enrolled in WRBCC.

15	Month	Year	Enrolled in WRBCC Agreement - Income above 150% FPL
16	7	2017	0
17	8	2017	0
18	9	2017	0
19	10	2017	6
20	11	2017	27
21	12	2017	50
22	1	2018	16
23	2	2018	19

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27 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-V-39.** REFERENCE: PWD STATEMENT 8, PAGE 9: PLEASE PROVIDE A  
2 BREAKDOWN OF THE 28,070 BY THE MONTH RECEIVED.

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4 **RESPONSE:**

5 The table below summarizes applications generated by month through the date specified in the  
6 referenced testimony.

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Month	Year	Applications Generated
6	2017	14,426
7	2017	2,241
8	2017	2,317
9	2017	1,856
10	2017	1,636
11	2017	3,599
12	2017	1,306
1	2018	689

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23 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-V-40.** REFERENCE: PWD STATEMENT 8, PAGE 10: PLEASE PROVIDE A  
2 BREAKDOWN OF THE 5,142 BY THE MONTH RECEIVED. SEPARATELY  
3 INDICATE IN THIS BREAKDOWN THE NUMBER WHO HAD INCOME AT  
4 OR BELOW 150% OF POVERTY LEVEL AND THE NUMBER WHO HAD  
5 INCOME ABOVE 150% OF POVERTY LEVEL.

6 **RESPONSE:**

7 The 5,142 applications submitted through January 13, 2018 in the referenced testimony are broken  
8 down in the table below.

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Month	Year	Less than or Equal to 150% of Federal Poverty Guideline	Greater than 150% Federal Poverty Guideline
7	2017	2,737	26
8	2017	1,234	13
9	2017	574	13
10	2017	408	6
11	2017	104	2
12	2017	24	0
1	2018	1	0

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

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**PA-V-41.** REFERENCE: PWD STATEMENT 8, PAGES 9-10: PLEASE PROVIDE THE NUMBER OF APPLICATIONS DENIED BY MONTH DISAGGREGATED BY THE REASON FOR DENIAL.

**RESPONSE:**

*PA-V-41 Attachment* shows the number of applications for which the applicant was not enrolled in TAP for each month, July 2017 to February 2018.

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

1 **PA-V-42.** REFERENCE: PWD STATEMENT 8, PAGE 10: PLEASE PROVIDE THE  
2 NUMBER OF TAP DENIALS BY MONTH FOR JULY 2017 TO PRESENT  
3 BROKEN DOWN BY WHETHER OR NOT THE DENIED APPLICANT WAS  
4 ENROLLED IN WRAP BY COMPONENT OF WRAP, IF ANY, IN WHICH  
5 ENROLLMENT OCCURRED.

6 **RESPONSE:**

7 Please see *PA-V-41\_Attachment* for the number of applications for which applicants were not  
8 enrolled in TAP, as well as the subset of those applicants who were instead enrolled in a WRBCC  
9 agreement because it was a more affordable alternative, or because the customer opted to reenroll  
10 in WRBCC, a component of WRAP.

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15 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**PA-V-47.** REFERENCE: PWD STATEMENT 8, PAGE 14: PLEASE PROVIDE A  
BREAKDOWN OF THE 11,200 APPLICATIONS SUBMITTED BY MONTH,  
SEPARATELY INDICATING THE SOURCE OF THE APPLICATIONS  
DISAGGREGATED BY THE FOUR SOURCES IDENTIFIED IN TESTIMONY  
AT STATEMENT 8, PAGE 10.

**RESPONSE:**

Approximately 11,200 applications were submitted through November 2017. As of January 19,  
2018, 13,562 applications had been submitted. The breakdown of those submittals by application  
generation source is included in *PA-V-47\_Attachment*.

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



1 **PA-V-78.** PLEASE IDENTIFY THE SPECIFIC DOLLAR AMOUNT OF TAP  
2 ADMINISTRATIVE COSTS CURRENTLY BEING COLLECTED IN PWD  
3 BASE RATES AS OF JULY 2017, DISAGGREGATED BY:  
4 A. WAGES;  
5 B. BENEFITS;  
6 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);  
7 D. INFORMATION TECHNOLOGY;  
8 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS  
9 CALCULATED);  
10 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE “OTHER” IS).

11 **RESPONSE:**

12 Please see attachment PA\_V\_78\_79\_80.

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14 **RESPONSE PROVIDED BY:** Michelle Bethel, Water Revenue Bureau and Melissa LaBuda,  
15 Philadelphia Water Department

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1 **PA-V-79.** PLEASE IDENTIFY, BY MONTH SINCE JULY 2017, THE ACTUAL  
2 DOLLAR AMOUNT OF ADMINISTRATIVE COSTS EXPENDED ON TAP  
3 SINCE JULY 1, 2017, DISAGGREGATED BY:  
4 A. WAGES;  
5 B. BENEFITS;  
6 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);  
7 D. INFORMATION TECHNOLOGY;  
8 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS  
9 CALCULATED);  
10 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE “OTHER” IS).

11 **RESPONSE:**

12 Please see attachment PA\_V\_78\_79\_80.

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14 **RESPONSE PROVIDED BY:** Michelle Bethel, Water Revenue Bureau and Melissa LaBuda,  
15 Philadelphia Water Department

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**PA-V-80.** PLEASE IDENTIFY BY MONTH FOR THE MONTHS JULY 2017 TO PRESENT INCLUSIVE:

A. THE DOLLAR AMOUNTS SPENT ON WAGES FOR INDIVIDUAL STAFF THAT WORK ON BOTH WRAP AND TAP, DISAGGREGATED BY THE DOLLAR AMOUNTS SPENT ON TAP AND THE DOLLAR AMOUNTS SPENT ON WRAP;

B. THE DOLLAR AMOUNTS SPENT ON BENEFITS FOR INDIVIDUAL STAFF THAT WORK ON BOTH WRAP AND TAP, DISAGGREGATED BY THE DOLLAR AMOUNTS SPENT ON TAP AND THE DOLLAR AMOUNTS SPENT ON WRAP;

C. THE DOLLAR AMOUNTS SPENT ON OVERHEAD FOR INDIVIDUAL STAFF THAT WORK ON BOTH WRAP AND TAP, DISAGGREGATED BY THE DOLLAR AMOUNTS SPENT ON TAP AND THE DOLLAR AMOUNTS SPENT ON WRAP;

D. THE DOLLAR AMOUNTS SPENT ON INFORMATION TECHNOLOGY FOR INDIVIDUAL STAFF THAT WORK ON BOTH WRAP AND TAP, DISAGGREGATED BY THE DOLLAR AMOUNTS SPENT ON TAP AND THE DOLLAR AMOUNTS SPENT ON WRAP; E. THE DOLLARS AMOUNTS

SPENT ON CONTINGENCY FOR INDIVIDUAL STAFF THAT WORK ON BOTH WRAP AND TAP, DISAGGREGATED BY THE DOLLAR AMOUNTS SPENT ON TAP AND THE DOLLAR AMOUNTS SPENT ON WRAP; AND

F. THE DOLLAR AMOUNTS SPENT ON "OTHER" (IDENTIFYING WITH SPECIFICITY WHAT THE "OTHER" IS), DISAGGREGATED BY THE DOLLAR AMOUNTS SPENT ON TAP AND THE DOLLAR AMOUNTS SPENT ON WRAP.

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**RESPONSE:**

Please see attachment PA\_V\_78\_79\_80.

**RESPONSE PROVIDED BY:** Michelle Bethel, Water Revenue Bureau and Melissa LaBuda,  
Philadelphia Water Department