

**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 X**

- PA-X-1. Does PWD believe there to be Limited English Proficient (LEP) persons who qualify for TAP in PWD's service territory?
- PA-X-2. How many LEP households in PWD's service territory does PWD estimate are eligible for TAP?
- PA-X-3. By week, since July 1, 2017, provide the number of LEP persons enrolled in TAP?
- PA-X-4. How many TAP applications have been requested in languages other than English?
- PA-X-5. How many TAP applications have been submitted in languages other than English?
- PA-X-6. Per Philadelphia City Code § 19-1605 (5)(c), which TAP documents have been identified as "vital" and translated into Spanish?
- PA-X-7. On which documents has WRB printed taglines, in English, Spanish, and other languages, advising limited English proficient (LEP) persons that telephone interpreter services are available at the WRB?
- PA-X-8. Please provide a list of all languages included in WRB taglines advising of telephone interpreter services.
- PA-X-9. Reference PWD Statement No. 5 at Pg. 5, ln. 9-10: What specific information about TAP has been produced and disseminated in Spanish?
- PA-X-10. Reference PWD Statement No. 5 at Pg. 3, ln. 6-12: Which of the outreach materials identified were produced in Spanish or contained Spanish content?
- PA-X-11. Reference PWD Statement No. 5 at Pg. 3, ln. 13-16: Were TAP informational workshops hosted in the fall of 2016 and spring/summer of 2017 conducted in Spanish or languages other than English?

PA-X-12. How do WRB staff provide interpretation services at each WRB point of contact with the public?

PA-X-13. How does the WRB provide notice to the public at each office location that language services are available?

PA-X-14. How does WRB process translated applications when customers' responses to application questions are not in English?

PA-X-15. What steps does the WRB take to communicate with LEP applicants when the WRB needs additional information to determine eligibility for TAP?

PA-X-16. How does WRB document the primary language of each LEP customer who submits a TAP application to ensure meaningful access to TAP and other payment agreements?

PA-X-17. Reference PWD Statement No.8, Pg. 13-14: Please state the number of customers who had existing WRAP benefits extended to accommodate the processing of TAP applications.

PA-X-18. Reference PWD Statement No.8, Pg. 13-14: Please state the number of customers who had shut-off holds extended while their TAP status was in process.

PA-X-19. Please provide a complete list of types of properties/accounts/customers that are exempt from paying the Department's storm water charges.

PA-X-20. For each type of property listed in response to the immediately preceding discovery request, please provide by month, for each month January 2016 to present inclusive, the number of properties/accounts/customers that were exempted from paying storm water charges in that month.

PA-X-21. For each type of property/account/customer listed in response to Request No. 1, by month for each month January 2016 to present inclusive, please provide the number of properties/accounts/customers newly exempted in that month from paying storm water charges.

PA-X-22. For each type of property/account/customer listed in response to Request No. 1, by month for each month January 2016 to present inclusive, please provide the number of properties/accounts/customers for which the exemption from paying storm water charges was lifted in that month.

PA-X-23. Provide a detailed explanation of the process by which a property is deemed eligible or qualified to become exempt from paying storm water charges.

PA-X-24. Provide a detailed explanation of each internal administrative step taken to determine:

- a. Whether a property/customer/account should be exempted from paying storm water charges;
- b. Whether a property/customer/account that has been exempted from paying storm water charges should be found to be no longer exempt.

PA-X-25. Please identify the class/level/category of PWD employee that determines whether:

- a. A property/customer/account should be exempted from paying storm water charges;
- b. A property that has been exempted from paying storm water charges should be found to be no longer exempt.

PA-X-26. Please identify the documentation required of a customer to be found exempt from paying storm water charges. Separately provide a copy of all standards forms or other standard written documents involved with reviewing whether, and/or making a determination of whether a property/customer/account qualifies for an exemption from paying storm water charges.

PA-X-27. Please indicate whether a request to be exempt from paying the storm water charge must be made in paper or whether any such request may be made digitally. Either way, describe how such a request (in paper, digitally) can be initiated.

PA-X-28. Please provide:

- a. A detailed explanation of the internal administrative steps by which a customer/account periodically re-verifies the eligibility of a property/customer/account to be exempted from paying storm water charges. Such steps should include all steps including, but not limited to, for example, incorporating changes into the billing system, confirming ownership status, etc.;
- b. A detailed explanation of the internal administrative steps by which PWD periodically reviews exemptions from storm water charges to determine whether the exemption should be continued. Such steps should include all steps including, but not limited to, for example, incorporating changes into the billing system, confirming ownership status, etc.;
- c. A detailed explanation of the internal administrative steps by which customer who has previously been exempted from paying storm water charges, but has been determined to be no longer eligible for such exemption, has the exemption removed. Such steps should include all steps including, but not limited to, for

example, incorporating changes into the billing system, confirming ownership status, etc.

- d. Separately indicate the time involved with each step of each process explained in subsections (a) – (c) of this request.

PA-X-29. Please identify in hours, or in increments of hours if less than 1.0, the time used to process:

- a. A request to be exempted from paying storm water charges;
- b. A review of whether a property/customer/account that has been previously exempted from the storm water charges should be made non-exempt;

PA-X-30. Please identify for each class/level/category of employee involved with the review and/or determination of whether a customer should be exempt from paying storm water charges the hourly cost, including both direct, indirect and allocated costs. Provide this hourly cost disaggregated by line-item cost component.

PA-X-31. Please identify, if different from the response to the immediately preceding discovery request, the hourly cost, including both direct, indirect and allocated costs, involved with the review and/or determination of whether a customer previously exempted from storm water charges should remain exempt.

PA-X-32. Please identify, if different from the response to Question 12, the hourly cost involved with removing the exemption of a customer/property/account from paying storm water charges and changing a customer's account status to ensure that storm water charges are imposed in the future once the exemption is removed.

PA-X-33. Please provide all internal PWD written processes and/or procedures, including any/all staff training manuals and/or information technology processes, addressing:

- a. A determination of whether a property/customer/account is exempt from paying storm water charges;
- b. A determination of whether a property/customer/account previously exempted from paying storm water charges remains eligible for the exemption; and
- c. Removing the exemption of a property/customer/account and changing the customer's account status to ensure that storm water charges are imposed in the future once an exemption is removed.