

**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 XII**

- PA-XII-1. Reference: PWD response to PA-III-2. Please provide the “performance measures report” through March 31, 2018 when it is completed.
- PA-XII-2. Reference: PWD response to PA-III-2. On the “performance measures report,” for each three-month period:
- a. Provide the primary reason(s) for an application to be found “incomplete.”
 - b. Separately indicate whether the reason an application is found to be “incomplete” differs between the time frames within which an “initial decision” is made (e.g., 30 days, 30-60 days, 60-90 days, etc.).
- PA-XII-3. Reference: PWD response to PA-III-2. On the “performance measures report,” please provide a detailed explanation of the factors that result in an initial decision is “incomplete” would:
- a. Take more than 60 days;
 - b. Take more than 90 days;
 - c. Take more than 120 days.
- PA-XII-4. Reference: PWD response to PA-III-2. The “performance measures report” dated January 30, 2018 indicates that 8,702 TAP applications were submitted between July 1, 2017 and September 30, 2017. The “performance measures” report dated January 30, 2018 further indicates that 3% (n=248) of those applications had not been acted upon (i.e., approved, denied or found incomplete) by January 30, 2018. Please provide a detailed explanation of the factors that result in 248 applications submitted on or before September 30, 2017 not being acted upon by January 30, 2018.
- PA-XII-5. Reference: PWD response to PA-III-2. In the “Applications Submitted and Reviewed Reports,” please define each of the following terms:
- a. In progress
 - b. Incomplete
 - c. Exception

- d. Expired
- e. Active
- f. Closed
- g. Incomplete -> In Progress
- h. Exception -> In Progress
- i. In Progress -> Incomplete
- j. In Progress -> Denied
- k. Incomplete -> Denied
- l. In progress -> Exception
- m. In Progress -> Active
- n. Approved -> Active
- o. Active -> Closed

PA-XII-6. Reference: PWD response to PA-III-2. In the “Applications Submitted and Reviewed Reports,” please indicate whether:

- a. Each of the Major Groupings in Section 2 (In Progress, Incomplete, Denied, Exception, Approved, Active, Closed) are mutually exclusive.
- b. Each number of applications in the major Groupings in Section 2 are a subset of the groupings in Section 3 (e.g., is the 79 “In Progress” in Section 2 a subset of the 6,227 “In Progress” in Section 3?).

PA-XII-7. Reference: PWD response to PA-III-2. In the “Applications Submitted and Reviewed Reports,” if not answered in response to Request 5 above, please provide a detailed explanation of the distinction between an application that is “In Progress” and an application that is “Active.”

PA-XII-8. Reference: PWD response to PA-iii-2. In the “Applications Submitted and Reviewed Reports,” please provide a detailed explanation of how an application can move from being “Approved” to being “Active.”

PA-XII-9. Please provide a detailed explanation of the difference between an application that is “generated” and an application that is “submitted.”

PA-XII-10. Reference: PWD Response to PA-V-41. In the spreadsheet attached to PA-V-41, define the term “LONGSTD.”

PA-XII-11. Reference: PWD Response to PA-V-41. In the spreadsheet attached to PA-V-41, when PWD states that a customer is not enrolled in TAP for the following reason: “Enrolled in More Affordable Alternative - Senior Citizen Discounted Bill + Extended Payment Agreement (LONGSTD),” does this reason indicate that for these customers, the sum of a senior citizen

discounted bill and arrearages paid through an extended payment agreement is less than the percentage of income payment the customer would make under TAP? If that is not what this reason states, please provide a detailed explanation of the reason: “Enrolled in More Affordable Alternative - Senior Citizen Discounted Bill + Extended Payment Agreement (LONGSTD).”

PA-XII-12. Reference: PWD Response to PA-V-41. In the spreadsheet attached to PA-V-41, when PWD states that a customer is not enrolled in TAP for the following reason: “Enrolled in More Affordable Alternative - Regular Bill + Extended Payment Agreement (LONGSTD),” does this reason indicate that for these customers, the sum of a regular bill and arrearages paid through an extended payment agreement is less than the percentage of income payment the customer would make under TAP? If that is not what this reason states, please provide a detailed explanation of the reason: “Enrolled in More Affordable Alternative - Regular Bill + Extended Payment Agreement (LONGSTD).”

PA-XII-13. Reference: PWD Response to PA-V-41. Please provide a detailed explanation of all ways in which pre-existing arrearages are taken into account in a determination of whether a TAP applicant has a “more affordable alternative.”

PA-XII-14. Reference: PWD Response to PA-V-41. In the spreadsheet attached to PA-V-41, when PWD states that a customer is “Denied for Reason—Income and Residency Guidelines” and “Denied for Reason—Residency Guidelines,” are the references to “residency guidelines” limited exclusively to the residency requirements set forth in language in the Regulations (206.2(f)), which regulations require customers to establish that they live in the property and define the various sorts of documentation that can prove such residency. If the answer is “no,” please provide a detailed explanation of all “residency guidelines” referenced in the spreadsheet attached to PA-V-41.

PA-XII-15. Reference: PWD Response to PA-V-41. In the spreadsheet attached to PA-V-41, when PWD states that a customer is denied for “Invalid Income or Residency Documentation,” separately provide a detailed explanation of:

- a. What makes income documentation “invalid.”
- b. What makes residency documentation “invalid.”

PA-XII-16. Reference: PWD Response to PA-V-41. In the spreadsheet attached to PA-V-41, please provide a detailed explanation making a clear distinction between an “invalid” documentation and an “incomplete” documentation.

PA-XII-17. Reference: PWD Statement 9B, page 8 and PWD Response to PA-V-64:
The Black and Veatch witness specifically references his review of the “rate rider mechanism[...] employed by the Philadelphia Electric Company (PECO).” While the response to PA-V-64 makes a general reference to the PECO web site, there appears to be no specific “rate rider mechanism” for gas or electricity on that web site and, even if there were, it would not be clear that what is on the PECO web site is the “rate rider mechanism” specifically referenced in the PWD Statement 9B, page 8, line 22. Accordingly, this request is asked again: Provide a copy of the gas and of the electric “rate rider mechanism” used by PECO as referenced at PWD Statement 9B, line 22.

PA-XII-18. Reference: PWD Statement 9B, page 8 and PWD Response to PA-V-65:
The Black and Veatch witness specifically references his review of the “rate rider mechanism[...] employed by the Philadelphia Electric Company (PECO).” While the response to PA-V-65 makes a general reference to the PECO web site (PECO.com), there appears to be no specific identification on that web site of the universal service costs, for either gas or for electricity, that are included in base rates and those that are collected through the “rate rider mechanism” referenced by the witness. Moreover, even if such costs were identified on the PECO web site, it would not be clear that what is on the PECO web site is the “rate rider mechanism” specifically referenced in the PWD Statement 9B, page 8, line 22. Accordingly, this request is asked again: Separately for PECO gas and for PECO electric, please identify the dollars of universal service costs which PECO collects: (a) through base rates; and (b) through its universal service rider, as per the “rate rider mechanism” referenced by the witness’ specific reference to his “review” (Statement 9B, page 8, line 21) of the “rate rider mechanism[...] employed by Philadelphia Electric Company (PECO).”