

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

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4 **PA-X-1.** DOES PWD BELIEVE THERE TO BE LIMITED ENGLISH PROFICIENT
5 (LEP) PERSONS WHO QUALIFY FOR TAP IN PWD’S SERVICE
6 TERRITORY?

7 **RESPONSE:**

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27 **RESPONSE PROVIDED BY:** Michelle Bethel, Water Revenue Bureau
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1 **PA-X-2.** HOW MANY LEP HOUSEHOLDS IN PWD’S SERVICE TERRITORY DOES
2 PWD ESTIMATE ARE ELIGIBLE FOR TAP?
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4 **RESPONSE:**
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6 According to the 2016 American Community Survey, about 10.4% of Philadelphia’s
7 population speaks English “less than very well.” For further information, the study is
8 available at:

9 https://factfinder.census.gov/bkmk/table/1.0/en/ACS/16_5YR/S1601/0500000US42101
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11 The City is unable to apply the study results to determine how many LEP households in
12 PWD’s service territory may be eligible for TAP.
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27 **RESPONSE PROVIDED BY:** Michelle Bethel, Water Revenue Bureau and Raftelis Financial
28 Consultants, Inc.

1 **PA-X-3.** BY WEEK, SINCE JULY 1, 2017, PROVIDE THE NUMBER OF LEP
2 PERSONS ENROLLED IN TAP?
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4 **RESPONSE:**
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6 The number of non-English applications approved for enrollment TAP each week between
7 July 1, 2017 and March 28, 2018 is included as PA-X-3_Attachment.
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28 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-X-4.** HOW MANY TAP APPLICATIONS HAVE BEEN REQUESTED IN
2 LANGUAGES OTHER THAN ENGLISH?
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4 **RESPONSE:**
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6 As of March 28, 2018, 285 non-English applications have been requested.
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28 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-X-5.** HOW MANY TAP APPLICATIONS HAVE BEEN SUBMITTED IN
2 LANGUAGES OTHER THAN ENGLISH?

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4 **RESPONSE:**

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As of March 28, 2018, 189 non-English applications have been submitted. Of those, 5
7 applications contained responses in a language other than English.

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

1 **PA-X-6.** PER PHILADELPHIA CITY CODE § 19-1605 (5)(C), WHICH TAP
2 DOCUMENTS HAVE BEEN IDENTIFIED AS “VITAL” AND TRANSLATED
3 INTO SPANISH?
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5 **RESPONSE:**
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7 The Customer Assistance Program (CAP) application, the cover letter to application, and
8 the CAP website (<https://cap.phila.gov/static/index.html>) have been identified as vital and
9 translated into Spanish. The Customer Assistance Program decision letters have been
10 identified as vital and are currently being translated into Spanish.
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27 **RESPONSE PROVIDED BY:** Michelle Bethel and RaVonne Muhammad, Water Revenue
28 Bureau

1 **PA-X-7.** ON WHICH DOCUMENTS HAS WRB PRINTED TAGLINES, IN ENGLISH,
2 SPANISH, AND OTHER LANGUAGES, ADVISING LIMITED ENGLISH
3 PROFICIENT (LEP) PERSONS THAT TELEPHONE INTERPRETER
4 SERVICES ARE AVAILABLE AT THE WRB?

5 **RESPONSE:**

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7 WRB has printed taglines in English, Spanish, and other languages on the following
8 documents, advising that telephone interpreter services are available at the WRB:

- 9 1. Signage at all points of contact
- 10 2. The back of the bill
- 11 3. CAP application
- 12 4. CAP application received letter (since 11.20.17)
- 13 5. CAP application approved letter (since 11.20.17)
- 14 6. CAP application denied letter (since 11.20.17)
- 15 7. CAP application incomplete letter (since 11.20.17)
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27 **RESPONSE PROVIDED BY:** Michelle Bethel and RaVonne Muhammad, Water Revenue
28 Bureau

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PA-X-8. PLEASE PROVIDE A LIST OF ALL LANGUAGES INCLUDED IN WRB TAGLINES ADVISING OF TELEPHONE INTERPRETER SERVICES.

RESPONSE:

The point of service signage includes the following language taglines: Arabic, Burmese, Cantonese, Farsi, French, Haitian Creole, Hindi, Hmong, Italian, Japanese, Korean, Mandarin, Polish, Portuguese, Punjabi, Russian, Somali, Spanish, Tagalog, and Vietnamese. The CAP materials include the following language taglines: Arabic, Cambodian (Mon-Khmer), Chinese (simplified), Chinese (traditional), Italian, Portuguese, Russian, Spanish, and Vietnamese.

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

1 **PA-X-9.** REFERENCE PWD STATEMENT NO. 5 AT PG. 5, LN. 9-10: WHAT
2 SPECIFIC INFORMATION ABOUT TAP HAS BEEN PRODUCED AND
3 DISSEMINATED IN SPANISH?

4 **RESPONSE:**

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6 PWD has produced and disseminated the following TAP materials in Spanish:

- 7 1. CAP Application
 - 8 2. Point of Sale Display
 - 9 3. New Ways to Apply Pre-Launch Fact Sheet
 - 10 4. New Ways to Apply Post-Launch Fact Sheet
 - 11 5. Get Ready to Apply Fact Sheet
 - 12 6. FAQs
 - 13 7. New Ways to Apply Poster
 - 14 8. Tagline on the CAP application
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28 **RESPONSE PROVIDED BY:** Joanne Dahme, Philadelphia Water Department

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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?

RESPONSE:

See response to PA-X-9.

RESPONSE PROVIDED BY: Joanne Dahme, Philadelphia Water Department

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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?

RESPONSE:

No.

RESPONSE PROVIDED BY: Joanne Dahme, Philadelphia Water Department and Raftelis Financial Consultants, Inc.

1 **PA-X-12.** HOW DO WRB STAFF PROVIDE INTERPRETATION SERVICES AT EACH
2 WRB POINT OF CONTACT WITH THE PUBLIC?

3 **RESPONSE:**

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5 There is signage available at all points of contact advising that telephonic interpretation
6 services are available at no cost. Customer service representatives have access to a dual
7 handset for the telephonic interpretation. Additionally, when bilingual staff are available,
8 they provide interpretation.

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RESPONSE PROVIDED BY: Michelle Bethel, Water Revenue Bureau

1 **PA-X-13.** HOW DOES THE WRB PROVIDE NOTICE TO THE PUBLIC AT EACH
2 OFFICE LOCATION THAT LANGUAGE SERVICES ARE AVAILABLE?

3 **RESPONSE:**

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5 There is signage available at all points of contact advising that telephonic interpretation
6 services are available at no cost.

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RESPONSE PROVIDED BY: Michelle Bethel, Water Revenue Bureau

1 **PA-X-14.** HOW DOES WRB PROCESS TRANSLATED APPLICATIONS WHEN
2 CUSTOMERS' RESPONSES TO APPLICATION QUESTIONS ARE NOT IN
3 ENGLISH?
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5 **RESPONSE:**
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7 Applications with responses that are not in English are forwarded to the Office of
8 Immigrant Affairs for translation. Once the translation is complete, WRB resumes its
9 standard review process. While the application responses are being translated, the
10 customer remains protected from enforcement.
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26 **RESPONSE PROVIDED BY:** Michelle Bethel and RaVonne Muhammad, Water Revenue
27 Bureau
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1 **PA-X-15.** WHAT STEPS DOES THE WRB TAKE TO COMMUNICATE WITH LEP
2 APPLICANTS WHEN THE WRB NEEDS ADDITIONAL INFORMATION TO
3 DETERMINE ELIGIBILITY FOR TAP?
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5 **RESPONSE:**
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8 When the WRB needs more information to determine eligibility for any of our customer
9 assistance programs (i.e. an incomplete application), a letter is sent to the customer. A
10 tagline in Arabic, Cambodian (Mon-Khmer), Chinese (simplified), Chinese (traditional),
11 Italian, Portuguese, Russian, Spanish, and Vietnamese appears on the letter advising that
12 telephonic translation services are available.
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27 **RESPONSE PROVIDED BY:** Michelle Bethel and RaVonne Muhammad, Water Revenue
28 Bureau

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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?

RESPONSE:

When a Customer Assistance Program application is requested in a language other than English, the language choice is stored in CAMP and that information is conveyed to basis2.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-X-17.** REFERENCE PWD STATEMENT NO.8, PG. 13-14: PLEASE STATE THE
2 NUMBER OF CUSTOMERS WHO HAD EXISTING WRAP BENEFITS
3 EXTENDED TO ACCOMMODATE THE PROCESSING OF TAP
4 APPLICATIONS.

5 **RESPONSE:**

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7 3,274

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

RESPONSE:

9,512

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

1 **PA-X-19.** PLEASE PROVIDE A COMPLETE LIST OF TYPES OF
2 PROPERTIES/ACCOUNTS/CUSTOMERS THAT ARE EXEMPT FROM
3 PAYING THE DEPARTMENT'S STORM WATER CHARGES.
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5 **RESPONSE:**
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8 The Department recognizes two types of properties that are exempt from paying stormwater
9 charges: cemeteries and residential sideyards. Stormwater charges for other types of properties
10 may be eligible for a 100% discount or may have stormwater charges abated or terminated
11 pursuant to prior ordinances. However, these properties are considered to be eligible for a
12 discount or an abatement, rather than an exemption.
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25 **RESPONSE PROVIDED BY:** Erin Williams, Philadelphia Water Department
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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.

RESPONSE:

Please see response attachment PA-X-20 to PA-X-22.

RESPONSE PROVIDED BY: Erin Williams, Philadelphia Water Department

1 **PA-X-21.** FOR EACH TYPE OF PROPERTY/ACCOUNT/CUSTOMER LISTED IN
2 RESPONSE TO REQUEST NO. 1, BY MONTH FOR EACH MONTH
3 JANUARY 2016 TO PRESENT INCLUSIVE, PLEASE PROVIDE THE
4 NUMBER OF PROPERTIES/ACCOUNTS/CUSTOMERS NEWLY EXEMPTED
5 IN THAT MONTH FROM PAYING STORM WATER CHARGES.

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7 **RESPONSE:**

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9 Please see response attachment PA-X-20 to PA-X-22.
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26 **RESPONSE PROVIDED BY:** Erin William, Philadelphia Water Department
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1 **PA-X-22.** FOR EACH TYPE OF PROPERTY/ACCOUNT/CUSTOMER LISTED IN
2 RESPONSE TO REQUEST NO. 1, BY MONTH FOR EACH MONTH
3 JANUARY 2016 TO PRESENT INCLUSIVE, PLEASE PROVIDE THE
4 NUMBER OF PROPERTIES/ACCOUNTS/CUSTOMERS FOR WHICH THE
5 EXEMPTION FROM PAYING STORM WATER CHARGES WAS LIFTED IN
6 THAT MONTH.

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8 **RESPONSE:**

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11 Please see response attachment PA-X-20 to PA-X-22.
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26 **RESPONSE PROVIDED BY:** Erin William, Philadelphia Water Department
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1 **PA-X-23.** PROVIDE A DETAILED EXPLANATION OF THE PROCESS BY WHICH A
2 PROPERTY IS DEEMED ELIGIBLE OR QUALIFIED TO BECOME EXEMPT
3 FROM PAYING STORM WATER CHARGES.

4 **RESPONSE:**

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7 The Department determines whether a property is deemed eligible or qualified to become
8 exempt from paying stormwater charges according to the procedures and policies as
9 described in Section 2 of its Stormwater Credits and Appeals Manual, provided in PWD
10 Statement No. 6, the Direct Testimony of Erin Williams.
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26 **RESPONSE PROVIDED BY:** Erin Williams, Philadelphia Water Department
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1 **PA-X-24.** PROVIDE A DETAILED EXPLANATION OF EACH INTERNAL
2 ADMINISTRATIVE STEP TAKEN TO DETERMINE:
3 A. WHETHER A PROPERTY/CUSTOMER/ACCOUNT SHOULD BE
4 EXEMPTED FROM PAYING STORM WATER CHARGES;
5 B. WHETHER A PROPERTY/CUSTOMER/ACCOUNT THAT HAS BEEN
6 EXEMPTED FROM PAYING STORM WATER CHARGES SHOULD BE
7 FOUND TO BE NO LONGER EXEMPT.

8 **RESPONSE:**

- 9
- 10 A) The internal administrative steps taken to determine whether a property should be
11 exempted from paying stormwater charges is described in Section 2.4 of the
12 Stormwater Credits and Appeals Manual.
- 13 B) A parcel's existing exemption status is identified for review by one of the following:
- 14 1. A report is run monthly to check for changes in property land use on existing
15 exempted residential sideyards.
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- 17 2. An accountant from the Water Revenue Bureau informs the PWD Stormwater
18 Billing staff that a new water meter has been installed on a property that is
19 currently receiving a stormwater exemption.
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25 **RESPONSE PROVIDED BY:** Erin William, Philadelphia Water Department
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1 **PA-X-25.** PLEASE IDENTIFY THE CLASS/LEVEL/CATEGORY OF PWD EMPLOYEE
2 THAT DETERMINES WHETHER:
3 A. A PROPERTY/CUSTOMER/ACCOUNT SHOULD BE EXEMPTED FROM
4 PAYING STORM WATER CHARGES;
5 B. A PROPERTY THAT HAS BEEN EXEMPTED FROM PAYING STORM
6 WATER CHARGES SHOULD BE FOUND TO BE NO LONGER EXEMPT.

7 **RESPONSE:**

- 8
- 9 A) Geographic Information Systems (GIS) Specialists II and III and PWD’s on-site GIS
10 consultants determine whether a property should be exempted from paying
11 stormwater charges.
12 B) The same PWD employees described in PA-X-25(a) make this determination.
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27 **RESPONSE PROVIDED BY:** Erin Williams, Philadelphia Water Department
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1 **PA-X-26.** PLEASE IDENTIFY THE DOCUMENTATION REQUIRED OF A CUSTOMER
2 TO BE FOUND EXEMPT FROM PAYING STORM WATER CHARGES.
3 SEPARATELY PROVIDE A COPY OF ALL STANDARDS FORMS OR
4 OTHER STANDARD WRITTEN DOCUMENTS INVOLVED WITH
5 REVIEWING WHETHER, AND/OR MAKING A DETERMINATION OF
6 WHETHER A PROPERTY/CUSTOMER/ACCOUNT QUALIFIES FOR AN
7 EXEMPTION FROM PAYING STORM WATER CHARGES.

8 **RESPONSE:**

9
10 A customer's documentation requirements can be found in the Department's Stormwater
11 Credits and Appeals Manual in Section 2.3.2. The Department's Adjustment Appeals
12 Application "Form A", is provided in PWD Statement No. 6. Form A along with the
13 additional documentation provided by the customer, as described in the Manual, are reviewed
14 by the Department to determine whether a property qualifies for an exemption from
15 stormwater charges.

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27 **RESPONSE PROVIDED BY:** Erin Williams, Philadelphia Water Department
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1 **PA-X-27.** PLEASE INDICATE WHETHER A REQUEST TO BE EXEMPT FROM
2 PAYING THE STORM WATER CHARGE MUST BE MADE IN PAPER OR
3 WHETHER ANY SUCH REQUEST MAY BE MADE DIGITALLY. EITHER
4 WAY, DESCRIBE HOW SUCH A REQUEST (IN PAPER, DIGITALLY) CAN
5 BE INITIATED.

6 **RESPONSE:**

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8 The request can be made by completing the Department’s Adjustment Appeals Application
9 “Form A” and submitting it via email or regular mail, along with the required supporting
10 documentation, to the Department.
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26 **RESPONSE PROVIDED BY:** Erin Williams, Philadelphia Water Department
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1 **PA-X-28.** PLEASE PROVIDE:

2 A. A DETAILED EXPLANATION OF THE INTERNAL ADMINISTRATIVE
3 STEPS BY WHICH A CUSTOMER/ACCOUNT PERIODICALLY RE-
4 VERIFIES THE ELIGIBILITY OF A PROPERTY/CUSTOMER/ACCOUNT
5 TO BE EXEMPTED FROM PAYING STORM WATER CHARGES. SUCH
6 STEPS SHOULD INCLUDE ALL STEPS INCLUDING, BUT NOT
7 LIMITED TO, FOR EXAMPLE, INCORPORATING CHANGES INTO THE
8 BILLING SYSTEM, CONFIRMING OWNERSHIP STATUS, ETC.;

9 B. A DETAILED EXPLANATION OF THE INTERNAL ADMINISTRATIVE
10 STEPS BY WHICH PWD PERIODICALLY REVIEWS EXEMPTIONS
11 FROM STORM WATER CHARGES TO DETERMINE WHETHER THE
12 EXEMPTION SHOULD BE CONTINUED. SUCH STEPS SHOULD
13 INCLUDE ALL STEPS INCLUDING, BUT NOT LIMITED TO, FOR
14 EXAMPLE, INCORPORATING CHANGES INTO THE BILLING
15 SYSTEM, CONFIRMING OWNERSHIP STATUS, ETC.;

16 C. A DETAILED EXPLANATION OF THE INTERNAL ADMINISTRATIVE
17 STEPS BY WHICH CUSTOMER WHO HAS PREVIOUSLY BEEN
18 EXEMPTED FROM PAYING STORM WATER CHARGES, BUT HAS
19 BEEN DETERMINED TO BE NO LONGER ELIGIBLE FOR SUCH
20 EXEMPTION, HAS THE EXEMPTION REMOVED. SUCH STEPS
21 SHOULD INCLUDE ALL STEPS INCLUDING, BUT NOT LIMITED TO,
22 FOR EXAMPLE, INCORPORATING CHANGES INTO THE BILLING
23 SYSTEM, CONFIRMING OWNERSHIP STATUS, ETC.

24 D. SEPARATELY INDICATE THE TIME INVOLVED WITH EACH STEP OF
25 EACH PROCESS EXPLAINED IN SUBSECTIONS (A) – (C) OF THIS
26 REQUEST.

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28 **RESPONSE:**

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- A) There is no requirement that a customer periodically re-verify the eligibility of a property to be exempted from paying stormwater charges.
- B) Refer to response to PA-X-24-b above.
- C) Refer to response to PA-X-24-b above.
- D) The total amount of time to review parcels indicated in the response to PA-X-24-b above is less than 1 hour/month.

RESPONSE PROVIDED BY: Erin Williams, Philadelphia Water Department

1 **PA-X-29.** PLEASE IDENTIFY IN HOURS, OR IN INCREMENTS OF HOURS IF LESS
2 THAN 1.0, THE TIME USED TO PROCESS:

3 A. A REQUEST TO BE EXEMPTED FROM PAYING STORM WATER
4 CHARGES;

5 B. A REVIEW OF WHETHER A PROPERTY/CUSTOMER/ACCOUNT THAT
6 HAS BEEN PREVIOUSLY EXEMPTED FROM THE STORM WATER
7 CHARGES SHOULD BE MADE NON-EXEMPT;

8 **RESPONSE:**

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10 A) The total length of time it takes to process a request for an exemption from stormwater
11 for a residential sideyard or cemetery is 3-4 weeks. This includes processing the
12 appeal application, editing GIS data, mailing decision letters, calculating any
13 adjustments owed on previous bills and sending the adjustments to WRB to be
14 applied to the affected water account(s).

15 B) A report is run and reviewed monthly to verify that previously exempted properties
16 should remain exempted; this process takes less than 0.5 hours/month to complete.
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27 **RESPONSE PROVIDED BY:** Erin Williams, Philadelphia Water Department
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1 **PA-X-30.** PLEASE IDENTIFY FOR EACH CLASS/LEVEL/CATEGORY OF EMPLOYEE
2 INVOLVED WITH THE REVIEW AND/OR DETERMINATION OF
3 WHETHER A CUSTOMER SHOULD BE EXEMPT FROM PAYING STORM
4 WATER CHARGES THE HOURLY COST, INCLUDING BOTH DIRECT,
5 INDIRECT AND ALLOCATED COSTS. PROVIDE THIS HOURLY COST
6 DISAGGREGATED BY LINE-ITEM COST COMPONENT.

7 **RESPONSE:**

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9 Please refer to the Miscellaneous Fee Study Work Papers as previously provided in
10 attachment response PA-III-10. Hourly Salary and Overhead Rates are provided beginning
11 on Page 2 of the Work Papers (Page 6 of the PDF file). Please note that these employees do
12 not track hours specifically devoted towards review or determination of exemptions.

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

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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.

RESPONSE:

Please refer to PA-X-30.

RESPONSE PROVIDED BY: Melissa LaBuda, Philadelphia Water Department

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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.

RESPONSE:

Please refer to PA-X-30.

RESPONSE PROVIDED BY: Melissa LaBuda, Philadelphia Water Department

1 **PA-X-33.** PLEASE PROVIDE ALL INTERNAL PWD WRITTEN PROCESSES AND/OR
2 PROCEDURES, INCLUDING ANY/ALL STAFF TRAINING MANUALS
3 AND/OR INFORMATION TECHNOLOGY PROCESSES, ADDRESSING:
4 A. A DETERMINATION OF WHETHER A
5 PROPERTY/CUSTOMER/ACCOUNT IS EXEMPT FROM PAYING
6 STORM WATER CHARGES;
7 B. A DETERMINATION OF WHETHER A
8 PROPERTY/CUSTOMER/ACCOUNT PREVIOUSLY EXEMPTED FROM
9 PAYING STORM WATER CHARGES REMAINS ELIGIBLE FOR THE
10 EXEMPTION; AND
11 C. REMOVING THE EXEMPTION OF A
12 PROPERTY/CUSTOMER/ACCOUNT AND CHANGING THE
13 CUSTOMER'S ACCOUNT STATUS TO ENSURE THAT STORM WATER
14 CHARGES ARE IMPOSED IN THE FUTURE ONCE AN EXEMPTION IS
15 REMOVED.

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17 **RESPONSE:**

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19 A) See response attachment PA-X-33 Residential Sideyard Internal Review Process
20 document.
21 B) Not Applicable
22 C) Not Applicable
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27 **RESPONSE PROVIDED BY:** Erin Williams, Philadelphia Water Department
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