

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

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4 **PA-XII-1.** REFERENCE: PWD RESPONSE TO PA-III-2. PLEASE PROVIDE THE
5 “PERFORMANCE MEASURES REPORT” THROUGH MARCH 31, 2018
6 WHEN IT IS COMPLETED.

7 **RESPONSE:**

8 This report, dated April 4, 2018 is attached as PA-XII-1_Attachment. Note: Since January 30,
9 2018, this report has been revised in the following ways:

- 10 - include January to March 2018 and all decisions that have occurred since the last report,
11 - to include applications received in the last few hours of each quarter, and
12 - revised labeling to indicate initial status update, rather than initial decision.

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

1 **PA-XII -2.** REFERENCE: PWD RESPONSE TO PA-III-2. ON THE “PERFORMANCE
2 MEASURES REPORT,” FOR EACH THREE-MONTH PERIOD:

3 A. PROVIDE THE PRIMARY REASON(S) FOR AN APPLICATION TO BE
4 FOUND “INCOMPLETE.”

5 B. SEPARATELY INDICATE WHETHER THE REASON AN APPLICATION
6 IS FOUND TO BE “INCOMPLETE” DIFFERS BETWEEN THE TIME
7 FRAMES WITHIN WHICH AN “INITIAL DECISION” IS MADE (E.G., 30
8 DAYS, 30-60 DAYS, 60-90 DAYS, ETC.).

9 **RESPONSE:**

10 Applications are most often incomplete due to missing income documentation. This does not
11 differ from one timeframe to another.

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

1 **PA-XII -3.** REFERENCE: PWD RESPONSE TO PA-III-2. ON THE “PERFORMANCE
2 MEASURES REPORT,” PLEASE PROVIDE A DETAILED EXPLANATION
3 OF THE FACTORS THAT RESULT IN AN INITIAL DECISION IS
4 “INCOMPLETE” WOULD:
5 A. TAKE MORE THAN 60 DAYS;
6 B. TAKE MORE THAN 90 DAYS;
7 C. TAKE MORE THAN 120 DAYS.

8 **RESPONSE:**

9 WRB began approving applications for TAP on July 31, 2017 and the first customers received
10 TAP bills on August 1, 2017. These milestones occurred well in advance of the October 6th
11 TAP implementation deadline despite the immense programmatic, organizational, and training
12 effort involved in developing and launching TAP. Initially, WRB was focused on approving
13 the City’s most vulnerable customers first, approving those with TAP bills of less than \$25 per
14 month. During the first several months, while lowest income TAP applicants were being
15 enrolled, WRB was putting the finishing touches on critical programming and customer
16 communications elements, specifically those related to incomplete applications and denials.
17 Through these efforts, WRB ensured that customer facing materials (letters and bills) were in
18 compliance with the ordinance and regulations and provided enough information to the
19 customer. WRB was evaluating other applications, too, but waiting to make a formal decision
20 until all the necessary pieces were in place.

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22 Applicants were protected from enforcement during the period of review. When applications
23 were reviewed, documentation was evaluated with respect to the original submittal date.
24 Customers were not penalized for delays in processing.

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28 **RESPONSE PROVIDED BY:** Michelle Bethel and RaVonne Muhammad, WRB

1 **PA-XII-4.** REFERENCE: PWD RESPONSE TO PA-III-2. THE “PERFORMANCE
2 MEASURES REPORT” DATED JANUARY 30, 2018 INDICATES THAT 8,702
3 TAP APPLICATIONS WERE SUBMITTED BETWEEN JULY 1, 2017 AND
4 SEPTEMBER 30, 2017. THE “PERFORMANCE MEASURES” REPORT
5 DATED JANUARY 30, 2018 FURTHER INDICATES THAT 3% (N=248) OF
6 THOSE APPLICATIONS HAD NOT BEEN ACTED UPON (I.E., APPROVED,
7 DENIED OR FOUND INCOMPLETE) BY JANUARY 30, 2018. PLEASE
8 PROVIDE A DETAILED EXPLANATION OF THE FACTORS THAT RESULT
9 IN 248 APPLICATIONS SUBMITTED ON OR BEFORE SEPTEMBER 30, 2017
10 NOT BEING ACTED UPON BY JANUARY 30, 2018.

11 **RESPONSE:**

12 As discussed in response to PA-XII-3, initially WRB was focused on approving the City’s
13 most vulnerable customers. As of January 30, 2018, 97% of applications received in the first
14 quarter of the program had been acted upon. During the application review process, several
15 circumstances can lead to an application undergoing a lengthier evaluation. For example, the
16 review can uncover a meter issue that requires investigation and repair. As of April 4, 2018,
17 many of these outstanding issues have been resolved and only a small number of applications
18 from this period have not had an initial status change to Approved, Denied, or Incomplete. The
19 outstanding applications relate to applications from this period being evaluated with additional
20 information pursuant to Section 19-1605(3) of the Philadelphia Code.

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26 **RESPONSE PROVIDED BY:** Michelle Bethel and RaVonne Muhammad, WRB
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1 **PA-XII-5.** REFERENCE: PWD RESPONSE TO PA-III-2. IN THE “APPLICATIONS
2 SUBMITTED AND REVIEWED REPORTS,” PLEASE DEFINE EACH OF THE
3 FOLLOWING TERMS:

- 4 A. IN PROGRESS
- 5 B. INCOMPLETE
- 6 C. EXCEPTION
- 7 D. EXPIRED
- 8 E. ACTIVE
- 9 F. CLOSED
- 10 G. INCOMPLETE -> IN PROGRESS
- 11 H. EXCEPTION -> IN PROGRESS
- 12 I. IN PROGRESS -> INCOMPLETE
- 13 J. IN PROGRESS -> DENIED
- 14 K. INCOMPLETE -> DENIED
- 15 L. IN PROGRESS -> EXCEPTION
- 16 M. IN PROGRESS -> ACTIVE
- 17 N. APPROVED -> ACTIVE
- 18 O. ACTIVE -> CLOSED

19 **RESPONSE:**

- 20 A. IN PROGRESS: Application has been turned in by the customer and is under review
21 by WRB.
- 22 B. INCOMPLETE: Application has been reviewed by WRB and was deemed incomplete.
23 The customer has been notified of the information needed to complete the application.
- 24 C. EXCEPTION: Application has been turned in by the customer and is under review by
25 WRB. A special circumstance (such as translation or meter investigation) has caused
26 the application review to be paused while the circumstance is resolved.
- 27 D. EXPIRED: An application is set to this status to indicate that WRB does not expect to
28 receive it back, and a new application can be sent.

- 1 E. ACTIVE: The customer is actively participating in TAP and has received a TAP bill.
- 2 F. CLOSED: The customer's participation has ended because the customer opted out of
3 an assistance program or the account was closed.
- 4 G. INCOMPLETE -> IN PROGRESS: An application changed from INCOMPLETE at
5 the beginning of the timeframe in question to IN PROGRESS by the end of the
6 timeframe in question.
- 7 H. EXCEPTION -> IN PROGRESS: An application changed from EXCEPTION at the
8 beginning of the timeframe in question to IN PROGRESS by the end of the timeframe
9 in question.
- 10 I. IN PROGRESS -> INCOMPLETE: An application changed from IN PROGRESS at
11 the beginning of the timeframe in question to INCOMPLETE by the end of the
12 timeframe in question.
- 13 J. IN PROGRESS -> DENIED: An application changed from IN PROGRESS at the
14 beginning of the timeframe in question to DENIED by the end of the timeframe in
15 question.
- 16 K. INCOMPLETE -> DENIED: An application changed from INCOMPLETE at the
17 beginning of the timeframe in question to DENIED by the end of the timeframe in
18 question.
- 19 L. IN PROGRESS -> EXCEPTION: An application changed from IN PROGRESS at the
20 beginning of the timeframe in question to EXCEPTION by the end of the timeframe in
21 question.
- 22 M. IN PROGRESS -> ACTIVE: An application changed from IN PROGRESS at the
23 beginning of the timeframe in question to ACTIVE by the end of the timeframe in
24 question.
- 25 N. APPROVED -> ACTIVE: An application changed from APPROVED at the beginning
26 of the timeframe in question to ACTIVE by the end of the timeframe in question.
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1 O. ACTIVE -> CLOSED: An application changed from ACTIVE at the beginning of the
2 timeframe in question to CLOSED by the end of the timeframe in question.
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5 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-XII-6.** REFERENCE: PWD RESPONSE TO PA-III-2. IN THE “APPLICATIONS
2 SUBMITTED AND REVIEWED REPORTS,” PLEASE INDICATE WHETHER:
3 A. EACH OF THE MAJOR GROUPINGS IN SECTION 2 (IN PROGRESS,
4 INCOMPLETE, DENIED, EXCEPTION, APPROVED, ACTIVE, CLOSED)
5 ARE MUTUALLY EXCLUSIVE.
6 B. EACH NUMBER OF APPLICATIONS IN THE MAJOR GROUPINGS IN
7 SECTION 2 ARE A SUBSET OF THE GROUPINGS IN SECTION 3 (E.G.,
8 IS THE 79 “IN PROGRESS” IN SECTION 2 A SUBSET OF THE 6,227 “IN
9 PROGRESS” IN SECTION 3?).

10 **RESPONSE:**

- 11 A. Each of the major groupings in Section 2 is mutually exclusive.
12 B. Each number of applications in the major groupings in Section 2 are a subset of the
13 groupings in Section 3.

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

1 **PA-XII-7.** REFERENCE: PWD RESPONSE TO PA-III-2. IN THE “APPLICATIONS
2 SUBMITTED AND REVIEWED REPORTS,” IF NOT ANSWERED IN
3 RESPONSE TO REQUEST 5 ABOVE, PLEASE PROVIDE A DETAILED
4 EXPLANATION OF THE DISTINCTION BETWEEN AN APPLICATION
5 THAT IS “IN PROGRESS” AND AN APPLICATION THAT IS “ACTIVE.”

6 **RESPONSE:**

7 An application that is IN PROGRESS has not had a final decision (approval or denial) made on
8 it. An application that is ACTIVE has been approved for a program and has begun
9 participation in the program.

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

1 **PA-XII-8.** REFERENCE: PWD RESPONSE TO PA-III-2. IN THE “APPLICATIONS
2 SUBMITTED AND REVIEWED REPORTS,” PLEASE PROVIDE A
3 DETAILED EXPLANATION OF HOW AN APPLICATION CAN MOVE
4 FROM BEING “APPROVED” TO BEING “ACTIVE.”

5 **RESPONSE:**

6 An application becomes APPROVED when WRB determines a customer’s eligibility and
7 enrolls that customer in an assistance program. For TAP, a customer’s application remains in
8 APPROVED status until that customer receives their first TAP bill, at which point the
9 application becomes ACTIVE.

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

1 **PA-XII-9.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE DIFFERENCE
2 BETWEEN AN APPLICATION THAT IS “GENERATED” AND AN
3 APPLICATION THAT IS “SUBMITTED.”

4 **RESPONSE:**

5 An application that is “generated” has been printed by or for the customer or mailed to the
6 customer. An application is considered “submitted” once WRB receives the application for
7 review. After an application has been generated but before it is submitted, the application is in
8 a status of PENDING. Once an application is submitted, it is in a status of IN PROGRESS.

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

1 **PA-XII-10.** REFERENCE: PWD RESPONSE TO PA-V-41. IN THE SPREADSHEET
2 ATTACHED TO PA-V-41, DEFINE THE TERM “LONGSTD.”

3 **RESPONSE:**

4 LONGSTD is the Extended Payment Agreement for customers above 150% and at or below
5 250% of the federal poverty guideline and required under the Philadelphia Code Section 19-
6 1605(3)(h.2).

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

1 **PA-XII-11.** REFERENCE: PWD RESPONSE TO PA-V-41. IN THE SPREADSHEET
2 ATTACHED TO PA-V-41, WHEN PWD STATES THAT A CUSTOMER IS
3 NOT ENROLLED IN TAP FOR THE FOLLOWING REASON: “ENROLLED
4 IN MORE AFFORDABLE ALTERNATIVE - SENIOR CITIZEN
5 DISCOUNTED BILL + EXTENDED PAYMENT AGREEMENT (LONGSTD),”
6 DOES THIS REASON INDICATE THAT FOR THESE CUSTOMERS, THE
7 SUM OF A SENIOR CITIZEN DISCOUNTED BILL AND ARREARAGES
8 PAID THROUGH AN EXTENDED PAYMENT AGREEMENT IS LESS THAN
9 THE PERCENTAGE OF INCOME PAYMENT THE CUSTOMER WOULD
10 MAKE UNDER TAP? IF THAT IS NOT WHAT THIS REASON STATES,
11 PLEASE PROVIDE A DETAILED EXPLANATION OF THE REASON:
12 “ENROLLED IN MORE AFFORDABLE ALTERNATIVE - SENIOR CITIZEN
13 DISCOUNTED BILL + EXTENDED PAYMENT AGREEMENT (LONGSTD).”

14 **RESPONSE:**

15 Customers are placed in the most affordable alternative for which they are eligible. Customers
16 placed in extended payment agreements (on top of a senior citizen discounted bill) are above
17 150% and at or below 250% of the federal poverty guideline, which makes them ineligible for
18 TAP without a special hardship.

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

1 **PA-XII-12.** REFERENCE: PWD RESPONSE TO PA-V-41. IN THE SPREADSHEET
2 ATTACHED TO PA-V-41, WHEN PWD STATES THAT A CUSTOMER IS
3 NOT ENROLLED IN TAP FOR THE FOLLOWING REASON: “ENROLLED
4 IN MORE AFFORDABLE ALTERNATIVE - REGULAR BILL + EXTENDED
5 PAYMENT AGREEMENT (LONGSTD),” DOES THIS REASON INDICATE
6 THAT FOR THESE CUSTOMERS, THE SUM OF A REGULAR BILL AND
7 ARREARAGES PAID THROUGH AN EXTENDED PAYMENT AGREEMENT
8 IS LESS THAN THE PERCENTAGE OF INCOME PAYMENT THE
9 CUSTOMER WOULD MAKE UNDER TAP? IF THAT IS NOT WHAT THIS
10 REASON STATES, PLEASE PROVIDE A DETAILED EXPLANATION OF
11 THE REASON: “ENROLLED IN MORE AFFORDABLE ALTERNATIVE -
12 REGULAR BILL + EXTENDED PAYMENT AGREEMENT (LONGSTD).”

13 **RESPONSE:**

14 Customers are placed in the most affordable alternative for which they are eligible. Customers
15 placed in extended payment agreements (on top of a regular bill) are above 150% and at or
16 below 250% of the federal poverty guideline, which makes them ineligible for TAP without a
17 special hardship.

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

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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.”

RESPONSE:

All pre-existing arrearages, except those disputed at the time of application decision, are considered as the amount the customer would owe under a standard or extended payment agreement. A standard payment agreement is generally estimated such that pre-existing arrearages are paid off over 12 months. The monthly amount due under an extended payment agreement is calculated as the difference between 4% of the customer’s monthly income and the expected regular or senior citizen discounted bills. The agreement is set for as many months as needed for the customer to pay off pre-existing arrearages at that rate.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-XII-14.** REFERENCE: PWD RESPONSE TO PA-V-41. IN THE SPREADSHEET
2 ATTACHED TO PA-V-41, WHEN PWD STATES THAT A CUSTOMER IS
3 “DENIED FOR REASON—INCOME AND RESIDENCY GUIDELINES” AND
4 “DENIED FOR REASON—RESIDENCY GUIDELINES,” ARE THE
5 REFERENCES TO “RESIDENCY GUIDELINES” LIMITED EXCLUSIVELY
6 TO THE RESIDENCY REQUIREMENTS SET FORTH IN LANGUAGE IN
7 THE REGULATIONS (206.2(F)), WHICH REGULATIONS REQUIRE
8 CUSTOMERS TO ESTABLISH THAT THEY LIVE IN THE PROPERTY AND
9 DEFINE THE VARIOUS SORTS OF DOCUMENTATION THAT CAN PROVE
10 SUCH RESIDENCY. IF THE ANSWER IS “NO,” PLEASE PROVIDE A
11 DETAILED EXPLANATION OF ALL “RESIDENCY GUIDELINES”
12 REFERENCED IN THE SPREADSHEET ATTACHED TO PA-V-41.

13 **RESPONSE:**

14 Yes.

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

1 **PA-XII-15.** REFERENCE: PWD RESPONSE TO PA-V-41. IN THE SPREADSHEET
2 ATTACHED TO PA-V-41, WHEN PWD STATES THAT A CUSTOMER IS
3 DENIED FOR “INVALID INCOME OR RESIDENCY DOCUMENTATION,”
4 SEPARATELY PROVIDE A DETAILED EXPLANATION OF:
5 A. WHAT MAKES INCOME DOCUMENTATION “INVALID.”
6 B. WHAT MAKES RESIDENCY DOCUMENTATION “INVALID.”

7 **RESPONSE:**

8 A. Income documentation may be invalid when the documentation included with an
9 application is, for example, not dated within the acceptable timeframe set forth in the
10 Regulations Section 206.2(E) or has a payee name different than any household
11 member names listed on the application.

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13 B. Residency documentation may be invalid when the documentation included with an
14 application is, for example, not dated within the acceptable timeframe set forth in the
15 Regulations Section 206.2(F) or has a name different than that of the applicant.

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

1 **PA-XII-16.** REFERENCE: PWD RESPONSE TO PA-V-41. IN THE SPREADSHEET
2 ATTACHED TO PA-V-41, PLEASE PROVIDE A DETAILED EXPLANATION
3 MAKING A CLEAR DISTINCTION BETWEEN AN “INVALID”
4 DOCUMENTATION AND AN “INCOMPLETE” DOCUMENTATION.

5 **RESPONSE:**

6 Invalid documentation is documentation that is complete, but does not otherwise meet the
7 criteria stated in program regulations, as described in PA-XII-15. Incomplete documentation is
8 documentation that is missing in whole or in part as stated in program regulations.

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25 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-XII-17.** REFERENCE: PWD STATEMENT 9B, PAGE 8 AND PWD RESPONSE TO
2 PA-V-64: THE BLACK AND VEATCH WITNESS SPECIFICALLY
3 REFERENCES HIS REVIEW OF THE “RATE RIDER MECHANISM[...]
4 EMPLOYED BY THE PHILADELPHIA ELECTRIC COMPANY (PECO).”
5 WHILE THE RESPONSE TO PA-V-64 MAKES A GENERAL REFERENCE TO
6 THE PECO WEB SITE, THERE APPEARS TO BE NO SPECIFIC “RATE
7 RIDER MECHANISM” FOR GAS OR ELECTRICITY ON THAT WEB SITE
8 AND, EVEN IF THERE WERE, IT WOULD NOT BE CLEAR THAT WHAT IS
9 ON THE PECO WEB SITE IS THE “RATE RIDER MECHANISM”
10 SPECIFICALLY REFERENCED IN THE PWD STATEMENT 9B, PAGE 8,
11 LINE 22. ACCORDINGLY, THIS REQUEST IS ASKED AGAIN: PROVIDE A
12 COPY OF THE GAS AND OF THE ELECTRIC “RATE RIDER MECHANISM”
13 USED BY PECO AS REFERENCED AT PWD STATEMENT 9B, LINE 22.

14 **RESPONSE:**

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17 Please note that the Department has objected to this discovery request.
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25 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-XII-18.** REFERENCE: PWD STATEMENT 9B, PAGE 8 AND PWD RESPONSE TO
2 PA-V-65: THE BLACK AND VEATCH WITNESS SPECIFICALLY
3 REFERENCES HIS REVIEW OF THE “RATE RIDER MECHANISM[...]”
4 EMPLOYED BY THE PHILADELPHIA ELECTRIC COMPANY (PECO).”
5 WHILE THE RESPONSE TO PA-V-65 MAKES A GENERAL REFERENCE TO
6 THE PECO WEB SITE (PECO.COM), THERE APPEARS TO BE NO SPECIFIC
7 IDENTIFICATION ON THAT WEB SITE OF THE UNIVERSAL SERVICE
8 COSTS, FOR EITHER GAS OR FOR ELECTRICITY, THAT ARE INCLUDED
9 IN BASE RATES AND THOSE THAT ARE COLLECTED THROUGH THE
10 “RATE RIDER MECHANISM” REFERENCED BY THE WITNESS.
11 MOREOVER, EVEN IF SUCH COSTS WERE IDENTIFIED ON THE PECO
12 WEB SITE, IT WOULD NOT BE CLEAR THAT WHAT IS ON THE PECO
13 WEB SITE IS THE “RATE RIDER MECHANISM” SPECIFICALLY
14 REFERENCED IN THE PWD STATEMENT 9B, PAGE 8, LINE 22.
15 ACCORDINGLY, THIS REQUEST IS ASKED AGAIN: SEPARATELY FOR
16 PECO GAS AND FOR PECO ELECTRIC, PLEASE IDENTIFY THE DOLLARS
17 OF UNIVERSAL SERVICE COSTS WHICH PECO COLLECTS: (A)
18 THROUGH BASE RATES; AND (B) THROUGH ITS UNIVERSAL SERVICE
19 RIDER, AS PER THE “RATE RIDER MECHANISM” REFERENCED BY THE
20 WITNESS’ SPECIFIC REFERENCE TO HIS “REVIEW” (STATEMENT 9B,
21 PAGE 8, LINE 21) OF THE “RATE RIDER MECHANISM[...]” EMPLOYED BY
22 PHILADELPHIA ELECTRIC COMPANY (PECO).”

23 **RESPONSE:**

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25 Please note that the Department has objected to this discovery request.
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27 **RESPONSE PROVIDED BY:** Philadelphia Water Department
28