

**BEFORE THE
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD**

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater and Stormwater Rates and Related Charges	Fiscal Years 2019-2021
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**Philadelphia Water Department's Interrogatories and Requests for Production of Documents
(Set II)**

Pursuant to the Hearing Officer's Procedural Rules for this Rate Proceeding, the Philadelphia Water Department ("Department" or "PWD") requests that the Public Advocate provide full and complete answers to the following interrogatories and requests for production of documents within seven calendar days of the service hereof.

INSTRUCTIONS AND DEFINITIONS

1. Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession and control or custody of the Public Advocate or its consultants.
2. Each answer shall restate the question and identify the name and affiliation of the individual answering the interrogatory.
3. Copies of all answers shall be provided in PDF and/or XLS format via email.
4. Answers to these interrogatories and requests for production of documents shall be made in accordance with the Hearing Officer's Procedural Rules applicable to this rate proceeding.
5. Each answer in this set of interrogatories relates to an update from the Public Advocate's Statement 3 in the 2016 Philadelphia Water Department rate proceeding ("2016 Rate Proceeding") concerning the appropriate planning processes regarding inability to pay issues ("inability to pay" and "payment troubled" are used interchangeably in the data requests below).

INTERROGATORIES

PWD-II-1. With respect to the testimony of Roger Colton in the 2016 Rate Proceeding (pages 63-72), please respond to the following:

(a) Since the 2016 Rate Proceeding, has Mr. Colton, independently or in concert with Community Legal Services, undertaken any formal analysis of data/information concerning PWD payment troubled residential customers (served by 5/8-inch meters) or PWD residential customers more generally (served by 5/8-inch meters) concerning the following subject areas:

- (i) Shut off of water service for non-payment;
- (ii) Shut off of water service for breached payment agreement;
- (iii) Shut off of water service for non-compliance;
- (iv) Billing dispute;
- (v) Informal hearing appeal;
- (vi) Estimated bills;
- (vii) Metering issues (missing meter, theft);
- (viii) Zero usage accounts;
- (ix) Breached HELP loans;

- (x) Denied/Breached WRAP applications;
- (xi) Denied TAP applications;
- (xii) Tenant application;
- (xiii) Occupant application;
- (xiv) USTRA; and
- (xv) Denied application for service.

(b) Since the 2016 Rate Proceeding, has Mr. Colton undertaken, independently or in concert with CLS, any informal or anecdotal analysis of data/information concerning PWD payment troubled residential customers (served by 5/8-inch meters) or PWD customers more generally (served by 5/8-inch meters) concerning the following subject areas:

- (i) Shut off of water service for non-payment;
- (ii) Shut off of water service for breached payment agreement;
- (iii) Shut off of water service for non-compliance;
- (iv) Billing dispute;
- (v) Informal hearing appeal;
- (vi) Estimated bills;
- (vii) Metering issues (missing meter, theft);
- (viii) Zero usage accounts;
- (ix) Breached HELP loans;
- (x) Denied/Breached WRAP applications;
- (xi) Denied TAP applications;
- (xii) Tenant application;
- (xiii) Occupant application;
- (xiv) USTRA; and
- (xv) Denied application for service.

PWD-II-2. With respect to the subject matter identified in PWD-II-1(a) and (b), for each category for which a response is given, please describe the top three scenarios that best illustrate payment troubled customer and/or inability to pay issues.

PWD-II-3. With respect to the subject matter identified in PWD-II-1(a) and (b), for each category for which a response is given, please provide a break-down of the percentage of (i) owners (ii) tenants and (iii) occupants.

PWD-II-4. With respect to the testimony of Roger Colton in the 2016 Rate Proceeding (pages 63-72), please respond to the following:

(a) Since the 2016 Rate Proceeding, has Mr. Colton undertaken, independently or in concert with Community Legal Services, any formal analysis of data/information concerning PWD payment troubled small business customers (served by 5/8-inch or larger meters) or PWD small business customers more generally (served by 5/8-inch or larger meters) concerning the following subject areas:

- (i) Shut off of water service for non-payment;
- (ii) Shut off of water service for breached payment agreement;
- (iii) Shut off of water service for non-compliance;
- (iv) Billing dispute;
- (v) Informal hearing appeal;
- (vi) Estimated bills;
- (vii) Metering issues (missing meter, theft); and
- (viii) Zero usage accounts.

(b) Since the 2016 Rate Proceeding, has Mr. Colton undertaken, independently or in concert with Community Legal Services, any informal or anecdotal analysis of data/information concerning PWD payment troubled small business customers (served by 5/8-inch and larger meters) or PWD small business customers more generally (served by 5/8-inch or larger meters) concerning the following subject areas:

- (i) Shut off of water service for non-payment;
- (ii) Shut off of water service for breached payment agreement;
- (iii) Shut off of water service for non-compliance;
- (iv) Billing dispute;
- (v) Informal hearing appeal;
- (vi) Estimated bills;
- (vii) Metering issues (missing meter, theft); and
- (viii) Zero usage accounts.

PWD-II-5. With respect to the subject matter identified in PWD-II-4(a) and (b), for each category for which a response is given, please describe the top three scenarios that best illustrate payment troubled customer issues.

Respectfully submitted,

/s/ Andre C. Dasent

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