

**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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**RESPONSE OF PUBLIC ADVOCATE TO  
PHILADELPHIA WATER DEPARTMENT'S INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
(SET II)**

**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.

**Response:**

No

(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;

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- (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.

**Response:**

No

RESPONSES PROVIDED BY: Roger D. Colton

**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.

**Response:**

Not applicable. See PA response to PWD II-1.

RESPONSE PROVIDED BY: Roger D. Colton

**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.

**Response:**

Not applicable. See PA response to PWD II-1.

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RESPONSE PROVIDED BY: Roger D. Colton

**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.

**Response:**

No

(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;

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- (vi) Estimated bills;
- (vii) Metering issues (missing meter, theft); and
- (viii) Zero usage accounts.

**Response:**

No

RESPONSES PROVIDED BY: Roger D. Colton

**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.

**Response:**

Not applicable. See PA response to PWD II-4.

RESPONSE PROVIDED BY: Roger D. Colton

Date: April 11, 2018