

PHILADELPHIA WATER DEPARTMENT
REBUTTAL STATEMENT NO. 4

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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Rebuttal Testimony

of

Raftelis Financial Consultants, Inc.,

Michelle L. Bethel and RaVonne A. Muhammad, Water Revenue Bureau,

Joanne Dahme and Donna Schwartz, Philadelphia Water Department, and

Adam K. Thiel, Philadelphia Fire Department

on behalf of

The Philadelphia Water Department

Topics Addressed:

TAP Structure and Operations

TAP Administrative Costs

Public Fire Protection

Shutoff Notices

Dated: May 4, 2018

**REBUTTAL TESTIMONY OF RAFTELIS FINANCIAL CONSULTANTS, INC.,
MICHELLE L. BETHEL AND RAVONNE A. MUHAMMAD, WATER
REVENUE BUREAU, AND JOANNE DAHME AND DONNA SCHWARTZ,
PHILADLEPHIA WATER DEPARTMENT**

I. INTRODUCTION

Q1. PLEASE STATE YOUR NAMES AND POSITIONS FOR THE RECORD.

A1. Our names are Jon Davis, Henrietta Locklear, and Jennifer Fitts of Raftelis Financial Consultants, Inc. (RFC), Michelle L. Bethel and RaVonne A. Muhammad, City of Philadelphia Department of Revenue – Water Revenue Bureau (WRB), Donna Schwartz and Joanne Dahme, Philadelphia Water Department (PWD), and Adam K. Thiel, Philadelphia Fire Department. On behalf of the City of Philadelphia Water Department (Water Department), we proffer our collective rebuttal to Mr. Roger Colton’s testimony.

Q2. HAVE YOU PREVIOUSLY SUBMITTED TESTIMONY IN THIS PROCEEDING?

A2. Ms. Schwartz provided testimony in PWD Statement No. 4. Ms. Dahme provided testimony in PWD Statement No. 5. Ms. Bethel and Ms. Muhammad provided testimony in PWD Statement No. 7. RFC provided testimony in PWD Statement No. 8.

Mr. Thiel is providing rebuttal testimony with regard to public fire protection and his resume is attached as Schedule R4-1.

1 **Q3. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

2 A3. In this rebuttal, we provide our response to some of the concerns and criticisms
3 that Mr. Colton has expressed in his direct testimony on behalf of the Public
4 Advocate. We specifically address the following areas of Mr. Colton's
5 testimony:

- 6 • Part 1 Structure and Operation of TAP
- 7 • Part 2 TAP Cost Recovery (with regard to TAP Administrative Costs)
- 8 • Part 3 Public Fire Protection
- 9 • Part 4 Barring Unfair and Deceptive Shutoff Notices

10
11 **II. TAP STRUCTURE & OPERATIONS**

12 **Q4. DO YOU AGREE WITH MR. COLTON'S ASSERTION THAT TAP**
13 **IMPLEMENTATION METHODS ARE SUBJECT TO RESOLUTION BY**
14 **THE BOARD DURING THIS PROCEEDING?**

15 A4. No. The Water, Sewer and Stormwater Rate Board ("Rate Board") is a local
16 agency authorized to approve rates and charges for the Philadelphia Water
17 Department ("PWD"). The Rate Board has only the powers and authority
18 granted in the Philadelphia Code, Section 13-101(3). The Rate Board is
19 authorized to approve, modify or reject proposed rates and charges. As indicated
20 by the City Solicitor's opinion, dated June 6, 2016, the Rate Board lacks the
21 authority to direct how PWD and Water Revenue Bureau ("WRB") (collectively
22 referred to as "the Departments") provide their services. In view of the above,
23 Mr. Colton's requests that the Rate Board exceed its authority by directing the
24 Departments regarding TAP implementation methods, administration and access
25 should be rejected.

1
2 Throughout the development of TAP, the Departments sought input and
3 feedback from several stakeholders. The regulations that form the framework of
4 the program were provided to constituent groups through its RCAS Committee
5 and to Community Legal Services (acting outside of their role as Public
6 Advocate) for comment and feedback. The regulations were also vetted through
7 public hearings and written comment with CLS and City Council. When
8 developing customer facing materials such as the application and letters, the
9 Departments sought input and feedback from CLS, UESF, and the NECs, among
10 others. While the Board lacks the authority to direct how the Departments
11 implement TAP, the Departments have and will continue to seek outside
12 assistance in further development of the program.
13

14 **Q5. DO YOU AGREE WITH MR. COLTON'S POSITION THAT THE**
15 **APPLICATION IS TOO COMPLEX?**

16 A5. No. The Customer Assistance Application was one of the first documents
17 developed in the creation of TAP. The Departments worked through several
18 iterations of applications and used PECO's CAP application and PGW's CRP
19 application as guides. Both utilities' applications contain acknowledgement
20 sections that have not been barriers to enrollment. Additionally, both
21 applications request the applicant optionally provide social security numbers for
22 all household members. The enabling ordinance, codified in the Philadelphia
23 Code Section 19-1605, required that proof of application criteria be consistent
24 with Section 19-1305. See the Philadelphia Code Section 19-1605(3)(i)(.1). The
25 Departments' request for social security numbers mirrors the Department of

1 Revenue's Real Estate Tax Regulations. Compare Departments Regulations
2 Section 206.2(e)(2) with Department of Revenue Real Estate Tax Regulations
3 Section 302(b)(4)(c)(iv)(II). Additionally, the Departments also accept ITIN
4 numbers and plans to update the application to reflect that practice in the near
5 future. Also, the PGW application requests information when there is outside
6 financial support which is analogous to Attachment A of the Customer
7 Assistance Application. I have attached copies of PECO's CAP application and
8 PGW's CRP application to my testimony as Schedule R4-2. Further, the PUC
9 has approved of the use of a "zero income form" by Duquesne Light as similar
10 to the one used by the Department of Public Welfare. See PGW 2014-2016
11 USECP, Docket No. M-2013-2366301, Tentative Order at 16 (April 3, 2014). I
12 have attached a copy of DPW's form to my testimony as Schedule R4-3. As I
13 previously stated in my rebuttal testimony the Departments sought input and
14 feedback from several stakeholders in the development of the program and that
15 included the creation of the Customer Assistance Application. The Departments
16 worked with our partners (CLS, the NECs, and UESF) as well as behavioral
17 scientists in fine tuning the application.

18
19 I also disagree with Mr. Colton's unsupported assertion that the rate of
20 incomplete applications is "evidence that the application may be unreasonably
21 complex." See Public Advocate Statement 3: Colton Direct page 27, lines 8-9.
22 The rate of incomplete applications is similar to the rate experienced with
23 WRAP. As with WRAP, most applications are incomplete due to missing
24 residency or income information.

1 Finally, I disagree with Mr. Colton's unsupported assertion that "the multiple
2 layers of review to which PWD subjects TAP applications is further evidence
3 that the TAP application is too complex." See Public Advocate Statement 3:
4 Colton Direct page 27, lines 9-11. The two-part review process is not required
5 due to the complexity of the application, it acts as a form of quality control to
6 ensure the applicant is placed in the most affordable program and that other rate
7 payers are not unduly burdened by customers receiving assistance they are not
8 qualified for.

9
10 Please note that the response to Question 4 is incorporated in this response and
11 all responses below concerning TAP administrative changes recommended by
12 Mr. Colton.

13
14 **Q6. DO YOU AGREE WITH MR. COLTON'S ASSESSMENT THAT TAP**
15 **APPLICANTS ARE BEING HARMED BY UNREASONABLE DELAYS**
16 **IN HAVING APPLICATIONS APPROVED?**

17 A6. No. The timeline for approving applications is not unreasonable, and TAP
18 applicants are not being harmed. The ordinance establishing TAP required the
19 program to go into effect no later than 15 months of the Board's June 7, 2016
20 rate report, i.e. by September 2017. The fifteen months allowed for program
21 development and implementation was tight, given the immense technological
22 effort of developing new software to manage application data and workflow and
23 making numerous changes to the existing billing system. The Departments made
24 applications available on July 1, 2017, having sent applications to likely
25 applicants beforehand, and also allowed customers to apply online or submit

1 paper applications beginning that same day. The first TAP approvals occurred
2 during July, and the first TAP bills were issued in early August, well ahead of
3 the required timeframe. Because of the early outreach, a large volume of
4 applications came in during the first quarter of the program ("early influx
5 period"), while remaining IT and customer communication requirements were
6 being fulfilled. WRB representatives began by enrolling the most vulnerable
7 customers in TAP, at first issuing TAP bills between \$12 and \$25. WRB
8 addressed the large volume applications associated with the "early influx period"
9 referred to above. It should be noted that WRB has been consistently working
10 toward a steady state time period for processing applications throughout the
11 early stages of operation described in this testimony. WRB reviews applications
12 using a two-tier process to ensure accuracy of enrollment data and program
13 selection, in turn making sure the customer does get the most affordable bill, and
14 protecting other ratepayers. With TAP still in its infancy, and the timeline for
15 approving applications is reasonable considering the implementation
16 requirements and volume of applications. Customers are never harmed by the
17 timeframe for review, because they are protected from enforcement for the full
18 period of time the application is under review. At approval, all pre-TAP arrears,
19 including those that accumulated while the application was under review, are set
20 aside and continue to be protected from enforcement. Additionally, customers
21 are notified of their application's status. Notifications are provided to customers
22 in writing based on any application status change consistent with historical
23 practices of PWD and WRB for all existing programs. Status is also available at
24 any time upon request via a customer call.
25

1 **Q7. DO YOU AGREE THAT REGULATIONS REQUIRE THAT TAP BILLS**
2 **SHOULD BE RETROACTIVE TO THE TIME OF APPLICATION**
3 **SUBMISSION?**

4 A7. No. The Philadelphia Code does not require retroactive TAP bills. More
5 specifically, Section 19-605 (3)(i) of the Code states that “a Customer shall be
6 enrolled in IWRAP upon approval of a completed application...” When
7 applicants have their completed application approved by WRB, they are enrolled
8 in TAP and begin receiving a TAP bill immediately. In addition to the lack of
9 legislative basis for retroactivity, the level of effort to adjust the billing system
10 to recalculate and reissue bills would be immense, likely requiring program
11 stoppage while additional changes are made. Because the ordinance does not
12 require retroactive enrollment or billing, the calculation of how much a customer
13 would have been billed if the TAP rate were retroactive is not relevant.

14
15 **Q8. DO YOU AGREE WITH MR. COLTON WHEN HE SAYS THAT A TAP**
16 **APPLICANT SHOULD NOT BE SUBJECT TO “ENFORCEMENT**
17 **ACTIONS AFTER SUBMISSION OF A TAP APPLICATION?**

18 A8. Yes. Pursuant to the Philadelphia Code Section 19-1605(3)(m), Water
19 Regulations Section 206.8 and standard operating procedures, upon the
20 submission of a TAP application and upon acceptance and enrollment in TAP,
21 an enforcement hold is placed on the account. When a customer requests an
22 application WRB places a 14 day stay of enforcement which includes shutoffs,
23 civil actions, and sheriff sales. However, if the application is completed online
24 the stay of enforcement is immediately put in place and remains until a final
25 decision is made on the application by WRB. If the customer submits the

1 application within that 14 day stay of enforcement, the stay of enforcement is
2 continued until WRB makes a final decision on the application. If the customer
3 submits the application after the 14 day stay of enforcement, the stay is
4 reinstated when WRB receives the application for processing and remains until a
5 final decision is made on the application by the WRB.

6
7 While the customer is enrolled in TAP, the stay of enforcement remains in
8 place. The regulations do not restrict WRB from placing liens on a TAP
9 customer's arrears. However, the WRB has adopted a standard operating
10 procedure to exempt TAP customers from having their arrears subject to liens.

11
12 **Q9. DO YOU AGREE WITH MR. COLTON'S CONCLUSION REGARDING**
13 **THE CUSTOMER ASSISTANCE PROGRAM SELECTION**
14 **METHODOLOGY?**

15 A9. No. For program comparison, a TAP bill is calculated as a percent of income
16 and compared against the other programs for which the customer is eligible. A
17 TAP bill is a flat amount, which may or may not include a contribution toward
18 arrears, depending on the customer's current usage each month. Likely bills
19 under other programs are calculated including arrears, if applicable, and
20 compared against the TAP bill. The program with the lowest anticipated
21 monthly bill during the following 12-month period is selected for the customer.
22 The calculation of a TAP bill does not depend on the customer's arrears, but
23 whether or not a TAP bill is the most affordable option may depend on the
24 presence of an arrearage.

1 **Q10. DO YOU AGREE WITH MR. COLTON’S RECOMMENDATION THAT**
2 **THE RATE BOARD DIRECT PWD TO PROVIDE TAP PARTICIPANTS**
3 **WITH FULL ARREARAGE FORGIVENESS IN AN INCREMENTAL**
4 **FASHION OVER A TWO-YEAR PERIOD?**

5 A10. No. Under the City charter, responsibility for City debt more than 90 days old is
6 assigned to the Law Department. The Rate Board does not have the authority or
7 jurisdiction to direct PWD or WRB to provide full arrearage forgiveness.

8
9 **Q11. DO YOU AGREE WITH MR. COLTON’S RECOMMENDATION THAT**
10 **THE DEPARTMENTS NEED TO IMPROVE ITS OUTREACH AND**
11 **INTAKE METHODS?**

12 A11. No. While the Departments are always looking for improvements and
13 efficiencies, we are proud of the robust outreach program and current intake
14 methods. Prior to the program launch and during the early months of TAP, the
15 program was advertised in several mediums over several weeks. See Responses
16 to PA-ADV-93, PA-III-4, PA-III-6, and PA-V-21. The outreach included print,
17 radio, and transit advertising, the use of social media, and in-person events.

18
19 The Departments have undertaken several direct, targeted mailings to its
20 customers. These mailings have been sent to prior WRAP/WRBCC customers
21 and plans for future outreach include mailings to current customers who receive
22 the Senior Citizen Discount and customers with current agreements under the
23 Philadelphia Code Section 19-1305.

1 Additionally, the Departments formed partnerships with CLS, NECs, UESF, and
2 most recently PHA to assist in outreach efforts. The Departments also work with
3 CBOs, civic associations, City Council, and other neighborhood based
4 organizations on TAP outreach. Each of these groups was provided training on
5 TAP, the Customer Assistance Application process, and how to apply. Through
6 our follow up with these partners, the Departments were told that the groups
7 have been assisting customers apply for TAP using the paper and on-line
8 application. This contradicts Mr. Colton's unsupported statement that the
9 Departments are under-utilizing community organizations and that none of the
10 applications was generated through a CBO. See Public Advocate Statement 3:
11 Colton Direct page 47, lines 13-16.

12
13 **Q12. DO YOU AGREE WITH MR. COLTON'S ASSESSMENT THAT THERE**
14 **IS A SUBSTANTIALLY DISPROPORTIONATE UNDER-**
15 **ENROLLMENT OF LIMITED ENGLISH PROFICIENT (LEP)**
16 **HOUSEHOLDS?**

17 A12. No. Mr. Colton's assessment that there is a substantially disproportionate under
18 enrollment of LEP households in TAP is unsupported in the record. The
19 Departments have conducted outreach in Spanish and other top languages. The
20 Customer Assistance Application is available in Arabic, Cambodian (Mon-
21 Khmer), Chinese (simplified and traditional), Italian, Portuguese, Russian,
22 Spanish, and Vietnamese, in addition to English. Mr. Colton is simply mistaken
23 in his tally of applications directed to LEP populations which are across the
24 spectrum of languages spoken in Philadelphia. In his count of applications
25 submitted by LEP households, Mr. Colton fails to include submissions in

1 languages other than Spanish. See Public Advocate Statement 3: Colton Direct
2 page 56, lines 7-12 and response to PA-X-3. Mr. Colton then, using simplified
3 math, concludes that only a fraction of one percent of TAP applicants are from
4 LEP households. Mr. Colton's methodology is flawed in several respects: he
5 calculates approvals rather than application submissions, he neglects to consider
6 languages other than Spanish in his calculations, and he assumes that those with
7 LEP are unable to apply using the English application.

8
9 The Departments have been aggressive in developing a program that is
10 accessible to all Philadelphians, including those in LEP households. At project
11 launch the application was available in 10 languages, the online application was
12 available in English and Spanish, several applicant materials were available in
13 English and Spanish, and the correspondence had translation taglines. Our
14 partnerships with CLS, the NECs, and UESF have allowed us to reach LEP
15 households and we look forward to continuing those relationships to develop
16 further outreach.

17
18 **Q13. YOU AGREE WITH MR. COLTON'S RECOMMENDATION THAT**
19 **THE DEPARTMENTS SHOULD COMPLY WITH THE ENABLING**
20 **ORDINANCE IN REGARD TO CUSTOMERS WITH AGREEMENTS**
21 **UNDER THE PHILADELPHIA CODE SECTION 19-1305?**

22 **A13.** Yes. The Departments do comply with all aspects of the enabling Ordinance,
23 including those dealing with customers with agreements under the Philadelphia
24 Code Section 19-1305. As previously stated in response to PA-V-68, the WRB
25 uses a manual process to check each Customer Assistance Program Application

1 against Revenue records to determine if the applicant has been approved and
2 placed in a low-income taxpayer installment payment agreement in the prior
3 twelve (12) months. If the applicant has, WRB checks available income
4 information and/or documentation used in that application. If the current
5 Customer Assistance Program Application lacks sufficient information to
6 determine income eligibility, WRB will use the information and/or
7 documentation from the low-income taxpayer installment payment agreement
8 application. If the current Customer Assistance Program Application contains
9 sufficient and/or more recent information to determine residency and/or income-
10 eligibility, WRB will use the Customer Assistance Program Application
11 information and forward the same to the Department of Revenue's Taxpayer
12 Services for use as a change of circumstances review in relation to the low-
13 income taxpayer installment payment agreement. WRB has also already
14 implemented Mr. Colton's recommendation that those applications which had
15 previously been denied for missing income or residency documentation be
16 cross-checked with Revenue's information on low-income taxpayer installment
17 payment agreements. WRB and Revenue continue to work together to develop
18 IT solutions so that data can be shared more quickly, thus decreasing the time it
19 takes to review applications against Revenue data.
20

21 **III. TAP ADMINISTRATIVE COSTS**

22 **Q14. MR. COLTON PROPOSES THAT TAP ADMINISTRATION COSTS BE**
23 **CAPPED AT 10% OF TOTAL BENEFITS DUE TO HIS BELIEF THAT**
24 **WRB'S TAP UNIT IS OVERSTAFFED AND SOME OR ALL ITS**
25 **FUNCTIONS SHOULD BE OUTSOURCED. DO YOU AGREE?**

1 A14. No. Mr. Colton incorrectly compares the administrative costs of TAP to those of
2 a mature assistance program like the one at PGW. It is entirely reasonable to
3 expect a higher level of administrative costs with the implementation of a new
4 program such as TAP. In less than 24 months, the City has designed, developed,
5 and implemented a new program, generated almost 36,000 applications, and
6 received almost 20,000 submissions for review. Mr. Colton further recommends
7 that the City should outsource administration of TAP to help control costs. His
8 recommendations fail to acknowledge that the City has, in fact, outsourced some
9 major new processes that began with implementation of TAP: 1) the printing
10 and mailing of Customer Assistance Program application; 2) the management of
11 a new online Customer Assistance Program application web portal; and 3) the
12 digitization of Customer Assistance Program applications. Additionally, review
13 and approval of applications is not a new process and, therefore must be kept in-
14 house as it is a violation of existing City unionized workforce agreements to
15 outsource work currently being done by City employees. Finally, it is vital that
16 WRB exercise appropriate oversight to preserve the program's integrity and
17 assure ratepayer interests are protected.

18
19 **IV. SHUT-OFF NOTICES**

20 **Q15. DO YOU AGREE WITH MR. COLTON'S BELIEF THAT THE**
21 **DEPARTMENTS' SHUT OFF NOTICES ARE UNFAIR AND**
22 **DECEPTIVE?**

23 A15. No. The Departments' shut off notices and practices are forthright, open, and in
24 compliance with PWD Regulations. See Water Regulations Sections 100.4-6.
25 The regulations direct the language and frequency of the shut off notices.

1 Recently the shut off notices were updated and now contain language
2 encouraging customers to apply for TAP. The updated notices began being
3 issued on March 1, 2018. A sample of the updated notice is attached here to as
4 Schedule R4-4. In Mr. Colton's claim that, "a notice of disconnection [sic] for
5 nonpayment should be issued when, but only when, PWD has made the decision
6 to disconnect [sic] service in the absence of a customer paying [their] bill," it is
7 clear that Mr. Colton does not understand the shut off procedures of the
8 Departments. See Public Advocate Statement 3: Colton Direct page 103, lines 7-
9 9. The pool of available shut off work orders received from WRB each day
10 outnumber the amount of work orders PWD can complete in any given day.
11 Each PWD Field Service Representative ("FSR") is assigned 30 shut off work
12 orders to begin each day. The first shut off work order chosen is the shut off
13 work order with the highest delinquent balance. The system then chooses the
14 remaining 29 work orders by contiguity to the first work order. It is done this
15 way to minimize the travel time between shut off work orders and to increase
16 efficiency. PWD makes every attempt to restore the service to a property that
17 was shut off the same day if a restore work order is created before 6:00 PM. If
18 a restore work order is created after 6:00 PM it is scheduled for the first work
19 order the following day. As restore work orders are received each day, it
20 reduces the number of shut offs the FSR can complete. The performance
21 standard for each FSR is 30 completed jobs each day. The 30 completed jobs
22 are a combination of shut offs and restores. As the restore work orders increase
23 each day the number of completed shuts offs decrease.

1 **V. FIRE PROTECTION**

2 **Q16. DO YOU AGREE WITH MR. COLTON'S DETERMINATION THAT**
3 **THE RECOVERY OF FIRE PROTECTION COSTS IS IN DIRECT**
4 **CONTRAVENTION OF THE PHILADELPHIA CODE?**

5 A16. No. Mr. Colton's interpretation of the Philadelphia Code Section 13-101(4)(b) is
6 incorrect. The subsection states that the "cost of supplying water to City
7 facilities *and* fire systems" should be excluded from rates and charges. Mr.
8 Colton fails to recognize that the subsection refers to City facilities and City fire
9 systems, not public fire systems.

10
11 **Q17. DO YOU AGREE WITH MR. COLTON'S INFERENCE THAT**
12 **RECOVERY OF PUBLIC FIRE PROTECTION COSTS THROUGH**
13 **WATER CHARGES IS NOT AN INDUSTRY ACCEPTED PRACTICE?**

14 A17. No. Mr. Colton makes no declarative statement in his testimony, but by
15 highlighting the Departments' discovery responses, he insinuates that recovering
16 public fire protection costs through water charges is a novel approach. See
17 Public Advocate Statement 3: Colton Direct page 92, lines 18-20. However, the
18 American Water Works Association notes that the "contemporary approach
19 develops fire protection costs that can be passed on directly to customers..." See
20 *Principles of Water Rates, Fees, and Charges Manual of Water Supply*
21 *Practices MI*, American Water Works Association, 2017, page 158. In addition,
22 Mr. Colton does not appear to recognize the detailed discussion of this issue,
23 including examples of other utilities which recover public fire protection costs
24 from their customers through rates and charges as provided in PWD Statement
25 9A (Schedule BV-E5: WP-2).

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Q18. DO YOU AGREE WITH MR. COLTON’S COST CAUSATION CONCERNS REGARDING THE RECOVERY OF PUBLIC FIRE PROTECTION COSTS THROUGH WATER CHARGES?

A18. No. Mr. Colton states that the “costs are simply not causally linked to the provision of water/sewer service to PWD’s customers.” See Public Advocate Statement 3: Colton Direct page 95, lines 3-5. However, the availability of public fire protection services benefits all rate payers. The American Water Works Association finds that “the standby capacity to provide the needed water [for fire protection] is clearly intended for the use of the utility’s retail users.” See *Principles of Water Rates, Fees, and Charges Manual of Water Supply Practices MI*, American Water Works Association, 2017, page 161.

Q19. DOES THIS COMPLETE YOUR REBUTTAL TESTIMONY IN THIS MATTER?

A19. Yes, it does.



FIRE COMMISSIONER ADAM K. THIEL

Philadelphia Fire Department

On May 16, 2016, Mayor James Kenney appointed Adam Thiel to serve as the 20th Fire Commissioner for the City of Philadelphia. Commissioner Thiel is responsible for leading the Philadelphia Fire Department's 2,800-plus uniformed and civilian members in every facet of protecting our Nation's 5th-largest city from fires and emergencies arising from all hazards.

In February 2014, he was appointed to serve as a Deputy Secretary of Public Safety and Homeland Security for the Commonwealth of Virginia. In that role, he helped provide strategic direction, policy advice, management oversight, and operational coordination for eleven agencies with an overall budget of more than \$3.1B and 30,000 employees. Deputy Secretary Thiel was directly responsible for the Departments of: Emergency Management, Fire Programs (including the State Fire Marshal's Office), Military Affairs (Virginia National Guard), and State Police, along with the state's Homeland Security and Resilience portfolio.

Adam has also served as the Governor's deputy Homeland Security Advisor (dHSA), deputy Chief Resilience Officer (dCRO), Statewide Interoperability Coordinator (SWIC), and FirstNet State Single Point of Contact (SPOC). He facilitated the *Secure Commonwealth Panel* and *Rail Safety/Security Task Force*, co-led the state's *National Disaster Resilience Competition* (NDRC) project team to a \$120.5M Housing and Urban Development (HUD) grant award, and collaborated with a myriad of agencies in managing all aspects of Virginia's homeland security enterprise.

He was the fire chief for the City of Alexandria, Virginia from 2007-2014 and chaired the *Northern Virginia Emergency Response System (NVERS) Steering Committee*. Commissioner Thiel's 26 years' experience spans five states (MD, NC, VA, AZ, and PA) as a chief fire officer, incident commander, company officer, fire and emergency services instructor, hazardous materials team leader, paramedic, technical rescuer, structural/wildland firefighter, swiftwater rescuer, and rescue SCUBA diver; he has directly participated in planning, response, and recovery efforts for multiple Presidentially-declared disasters and National Special Security Events (NSSEs), including the 9/11 tragedy, hurricanes, tropical storms, floods, an earthquake, major blizzards, international sporting competitions, and political events.

In addition to public service, Adam has co-founded two successful consulting practices advising clients on the merits of crisis management, leadership, training development, risk analysis, and business strategy. He is a widely published author, and internationally sought after speaker.

Commissioner Thiel completed doctoral coursework in Public Administration and Public Policy at Arizona State University (ABD) and George Mason University, respectively; earned his M.P.A. degree from George Mason University; received his B.S. in Fire Science from the University of Maryland University College; and earned his B.A. in History from the University of North Carolina at Chapel Hill. Additionally, he has completed the *Virginia Executive Institute*, Harvard University's Kennedy School of Government *Program for Senior Executives in State and Local Government*, and the Naval Postgraduate School's Center for Homeland Defense and Security *Executive Leaders Program*.

Adam is a Certified Emergency Manager® (CEM), Fellow of the Institution of Fire Engineers (FIFireE), and holds several National Fire Protection Association (NFPA)-standard professional qualifications. He currently serves on multiple boards and committees, including: the NFPA Technical Committee on Emergency Service Organization Risk Management; Underwriters Laboratories (UL) Fire Council and Firefighter Safety Research Institute; George Washington University's Center for Cyber and Homeland Security Board; the American Red Cross Eastern Pennsylvania Region Board; and the Philadelphia Police Athletic League Board. He is a former chair of the National Fire Academy Board of Visitors and also served on the NFPA Fire Service Section Board. Adam is a 2017 Leadership Philadelphia Fellow and a 2018 USA Eisenhower Fellow.

Fire Commissioner Thiel is an Ironman® triathlon finisher, Crossfit® athlete, bicyclist (road and mountain), kayaker, martial arts practitioner, and aspiring gardener. Most importantly, he is the father of two energetic and accomplished teenagers.

PGW Customer Responsibility Program (CRP) APPLICATION / RECERTIFICATION FORM

Name: _____

Account Number: _____

Please Check:

☐ New Application☐ Recertification

Address: _____

Zip: _____ Phone: (____) _____

Household Information (Please list all children and adults living in your home, starting with yourself)

Last Name	First Name	Relationship	Social Security #	Date of Birth	Under 18 Y/N	(FOR PGW USE ONLY) Average gross monthly inc.
		Self				
					Total Average Monthly Household Income	

(If you need to include more household members, please attach a separate sheet)

IMPORTANT: Attach copies of current income documentation for all household members listed above (e.g., all pay stubs within last 30 days, social security letter). PGW will use this documentation to calculate each household member's average gross monthly income, using year-to-date earnings, if necessary. For adults over age 18 who do not have an income, use the lines below to explain their current situation (e.g., "applied for unemployment, but not eligible", "enrolled in high school / college"). Failure to provide this information when you apply may require follow up verification, which will delay processing.

Additional Financial Assistance (to be completed in its entirety and signed by the person providing assistance)

If someone not living in your home provides financial assistance to you or someone else in your home, they must complete the section below and sign where noted. PGW may require verification of the information stated in this section.

Name of person providing assistance: _____ Phone: _____

Address: _____ City: _____ State: _____ Zip: _____

(Signature of person providing assistance) _____ I certify that I provide _____ /month in cash assistance to the CRP applicant listed above and I understand that PGW can request verification of this information upon request.

Other Assistance (Yes or No response is required)

Indicate if your household receives the following types of assistance listed below, and the amount received for each (please attach documentation, such as the DPW Letter of Eligibility or a COMPASS printout). PGW does NOT include the dollar amount of this assistance as income when determining eligibility for CRP. The purpose for obtaining this information is to reduce the need for follow-up when determining how your household meets basic living expenses.

Food Stamps ☐ No ☐ Yes If yes, please list amount per month _____Housing subsidy (e.g., PHA housing, voucher) ☐ No ☐ Yes If yes, please list amount per month _____**Customer Responsibilities**

1. I agree to pay PGW the monthly CRP amount, plus \$5 toward my pre-program arrears (if any), and other additional charges that apply.
2. I understand that I will receive 1/36th forgiveness of pre-program arrears only in months that I pay my total amount due on time and in full.
3. I understand that if I miss one payment, I will be in default, collection activity will begin, and my service may be terminated.
4. I agree to apply for LIHEAP and list PGW as the utility company to which I want payment sent.
5. I agree to recertify each year by submitting a CRP application with updated household information and income documentation.
6. I agree to report all changes in household size and income, even if the changes occur before my required annual recertification.
7. I agree to accept the free services of PGW's conservation programs, if offered to me.
8. I agree to make a significant effort to conserve energy.
9. I hereby authorize PGW to verify information provided on this form through internal and third party sources, including City and State records and to obtain additional information from any source for any review.
10. I agree that if I fail to meet any of the Customer Responsibilities above, PGW may remove me from the Customer Responsibility Program.

Important Notice PUC requirements limit enrollment in CRP to customers who meet the income eligibility. PGW uses internal and third party sources, as well as standard benefit determinations made by the Social Security Administration and the Department of Public Welfare, to routinely audit and assess information and documentation provided by customers who apply for CRP. If through investigation you are found to have provided false information, you will be removed from CRP and may be required to repay the discounts and forgiveness received during the period for which you were ineligible for the program. You may also be subject to criminal prosecution for fraud. By signing below, you acknowledge that you have provided complete and correct information, have read and understand this notice, and agree to the Customer Responsibilities above.

PGW Representative _____ Customer Signature _____ Date _____

0121

PECO Universal Services - Customer Assistance Program (CAP) Application

INSTRUCTIONS: Please complete the application below. Attach proof of total gross income (before taxes) for each household member including yourself, and sign your name at the X.

PLEASE COMPLETE ALL INFORMATION IN ORDER FOR THIS APPLICATION TO BE PROCESSED. (Please Print Clearly)

1. Enter your account number, home phone number, name, address, and cell phone number
2. Enter the name of all members of your household including yourself
3. Attach proof of gross household income for all members in your household including yourself

There are four (4) ways to complete and submit your CAP application:

1. **Mail** the completed application along with the required proof of income to:
PECO CAP, P.O. Box 570, Jackson, MI 49204-9806
2. **Fax** information to 1-866-362-8906 (Toll Free) (Note: you must include account number and name on every page)
3. **On-line** at PECO.com/help - click "CAP" and then click "Apply"
4. E-mail - PECOCAP@exeloncorp.com

You can receive CAP application updates via text message by checking the text message "check box" next to cell phone number below. Otherwise, you will be notified by mail.

ACCOUNT NUMBER	Home Phone	
NAME Last	First	Middle Initial
ADDRESS	Apt. Number	
City	State	Zip Code
Cell Phone	<input type="checkbox"/> Check here to receive a status update via text message. Message & data rates may apply.	

See back of this application for acceptable sources of income

List all the people who live with you, starting with yourself. Include all adults and children. Attach proof of all income for all household members including you. Attach additional sheet, if needed.

Name (Last, First, M.I.)	*Social Security # or ITIN #	Birth Date	Relationship	Source of Income <i>See back for sources</i>
			SELF	

My signature on this CAP application gives my permission to PECO or its authorized agent to: (a) check any information I give about where I live, my jobs, income, resources, and energy supplier for me or any member of my household; (b) find out about the costs of my shelter, and heating use; (c) complete any survey or reporting to a governmental agency that it may be requested to do by that agency; (d) obtain a consumer credit report on me or any member of my household and; (e) obtain a copy of the federal income tax return for me or any member of my household. I authorize the release of limited information to approved agencies which provide other energy/weatherization assistance for which I may be eligible. I certify that the information I gave is true, correct and complete to the best of my knowledge. I understand that if I give false information, I can be denied or removed from CAP and subject to repay any CAP benefits received to date. You must sign this application to receive the CAP fixed credit benefit.

DO NOT SEND BILL PAYMENT WITH THIS APPLICATION.

**Social Security number or ITIN is optional*

X

Applicant's Signature



If you need help with your application, please call 1-800-774-7040

CLIENT NAME:

CASE NO:

DATE:

ZERO INCOME STATEMENT

This form must be completed and signed by the applicant whose household has little or no income.

Has your household received any income in the past 90 days? ☐ YES ☐ NO

If yes, please tell us where it came from and how much you received:

Please tell us how your household is meeting its needs for the following items:

Food:

Shelter:

Utility Service (electricity, heat, water, etc.):

Print Name

Signature

Date



pennsylvania

DEPARTMENT OF PUBLIC WELFARE

www.dpw.state.pa.us

*** IMPORTANT NOTICE ***

- **Your water service will be shut off on or after 06/11/2018.**
- To avoid suspension of service, please make payment immediately.
If you have already made your payment, please disregard this notice.
- If your service is suspended, a Restoration Fee will be added to the balance due.
- A Visitation Fee is added to the balance due if we show up to suspend service and payment is made at the property.
- If you are a tenant who is not responsible for paying the water bill according to your rental agreement, you may have additional rights to prevent your water from being shut off. Please call the Water Revenue Bureau at 215-686-6880.
- Suspension of water service may affect your fire suppression system if a single / combined domestic and fire service line serves the property.
- For your convenience, Customer Service is available Monday through Friday, 8:00 AM to 5:00 PM. We can be reached at 215-686-6880.
- Struggling to pay your bill? You may qualify for our billing assistance program called TAP. Call 215-685-6300 for an application or visit www.phila.gov/water-bill-help

City of Philadelphia
Department of Revenue
P.O. Box 41496
Philadelphia, PA 19101-1496

SHUT-OFF BILL

WATER/SEWER



YOUR WATER SERVICE IS SUBJECT TO SHUT-OFF FOR NON-PAYMENT. FOR FURTHER INFORMATION SEE REVERSE SIDE OF THIS BILL.

PAYMENTS MUST BE RECEIVED BEFORE SHUT-OFF DATE IN PERSON OR BY MAIL AT MSB 1401 JFK BLVD, CONCOURSE LEVEL, PHILADELPHIA, PA 19102-1663. MAKE CHECKS PAYABLE: CITY OF PHILA.

PRINCIPAL	PENALTY	CYCLE	CODE SEE ORIG. BILL	AMOUNT BILLED
2.58	0.00	18-01		2.58
43.84	2.85	18-02		46.69
51.39	2.22	18-03		53.61
51.39	0.00	18-04		51.39

PAY AT ONCE \$154.27

IF YOU HAVE ANY QUESTIONS
CALL 215-686-6880 IMMEDIATELY.

RETAIN THIS PORTION
OF BILL IF YOUR
PAYMENT IS MAILED.

PRESENT BOTH
PORTIONS WHEN
PAYING IN PERSON.



OWNER'S NAME AND PROPERTY BILLED (IF OTHER THAN ABOVE)



SERVICE
41R

ACCOUNT NUMBER

BILL INCLUDES PAYMENTS
RECEIVED ON OR BEFORE

➤ 04/24/18

DETACH HERE

83-T-118R (REV.03/18) WBS000

ACCOUNT NUMBER	DIST.	SEW%	CYCLE	SERVICE	CODE	PRINCIPAL	PENALTY	AMOUNT BILLED
0575960002013001								
			18-01	41R		2.58	0.00	2.58
			18-02	41R		43.84	2.85	46.69
			18-03	41R		51.39	2.22	53.61
			18-04	41R		51.39	0.00	51.39

OWNER'S NAME AND PROPERTY BILLED (IF OTHER THAN ABOVE)



SHUT-OFF BILL
WATER/SEWER

PAY AT ONCE \$154.27

33372000000999059600020130017000001542700000014920570000100000000008

MAIL THIS PORTION
OF BILL ONLY



IF NOT PAID, ADDITIONAL PENALTY WILL BE ADDED TO
THE NEXT REGULAR BILL. DO NOT STAPLE, PIN, OR FOLD.

City of Philadelphia
Department of Revenue
P.O. Box 41496
Phila., PA 19101-1496

WATER REVENUE BUREAU1401 JFK Boulevard
Philadelphia, PA 19102-1663**EL NEGOCIADO DE ACUEDUCTO**1401 JFK Boulevard
Philadelphia, PA 19102-1663**TO STOP THE WATER SHUT-OFF**

You must do one of the following on or before the shut-off date:

IF YOU ARE A TENANT WHO IS NOT A CUSTOMER

You may apply at the WRB for continued service under USTRA (the Utility Service Tenants Rights Act, 68 P.S. §399.1 et seq.), if the Authorized User is an USTRA Tenant.

IF YOU ARE A CUSTOMER (OWNERS AND TENANTS)

1. Pay the amount shown on the front of this notice; or
2. Make a payment agreement; or
3. Pay all amounts past due on the most recent payment agreement; or
4. Enroll in the Tiered Assistance Program (TAP) or other customer assistance program; or
5. Complete such other steps as may be required as specified in a Notice of Defect issued by the Water Department.

**YOU HAVE A RIGHT TO A HEARING BEFORE
YOUR WATER IS SHUT-OFF.****TO REQUEST A HEARING:**

1. You may request an Informal Hearing (IH) within ten (10) days if a dispute exists as to any matter described in Section 100.7(a) of the Water Department Regulations. You can request a IH form by calling one of our Call Centers at (215) 685-6300 or (215) 686-6880 or by visiting one of our Service Centers. Mailed requests for hearings are permitted, but must be received by the Water Revenue Bureau on or before this date.; or
2. You may submit a petition form to the Tax Review Board (TRB) within 60 days of the date of this notice. Forms can be requested from the TRB by calling (215) 686-5216 or downloaded at: http://www.phila.gov/trb/TRB_Petitions.html.

You will be notified by the Water Revenue Bureau or the TRB of the time and place of the hearing.

IF YOU REQUEST A HEARING, YOUR WATER SERVICE WILL BE CONTINUED UNTIL A FINAL DECISION HAS BEEN MADE.

CALL 215-686-6880 IF YOU ARE ILL OR OTHERWISE CANNOT GO TO THE WATER REVENUE BUREAU IN PERSON OR IF YOU NEED FURTHER INFORMATION OR EXPLANATION OF YOUR RIGHTS.

3118S (Rev. 02/18) WBSO01

**PARA DETENER LAS INTERRUPCIONES
EN EL SUMINISTRO DE AGUA**

Usted debe tomar una de las siguientes medidas en la fecha de interrupción del suministro de agua o con anterioridad a ella:

SI ES INQUILINO PERO NO ES CLIENTE

Debe solicitar la continuación del servicio en la Oficina de Recaudaciones por Servicios de Agua (Water Revenue Bureau, WRB) de conformidad con USTRA (Ley de Derechos de los Inquilinos sobre los Servicios Públicos, 68 P.S. §399.1 et seq.), si el Usuario Autorizado es un Inquilino según USTRA.

SI ES CLIENTE (PROPIETARIOS E INQUILINOS)

1. Pague el monto que se muestra en el anverso de este aviso; o
2. Haga un acuerdo de pago; o
3. Pague todos los montos adeudados en el acuerdo de pago más reciente; o
4. Inscribáse en el Tiered Assistance Program (Programa de Asistencia en Niveles, TAP) u otro programa de asistencia a clientes; o
5. Complete los pasos que puedan ser obligatorios según se especifica en un Aviso de Defecto emitido por el Departamento de Agua (Water Dept).

**USTED TIENE DERECHO A UNA AUDIENCIA ANTES
DE LA INTERRUPCIÓN DEL SERVICIO DE AGUA.****PARA SOLICITAR UNA AUDIENCIA:**

1. Puede solicitar una Audiencia Informal (IH) en el plazo de diez (10) días si existe una disputa relacionada con cualquier asunto descrito en la Sección 100.7(a) de la Normativa del Departamento de Agua. Puede solicitar un formulario de IH llamando a uno de nuestros Centros de Atención Telefónica al (215) 685-6300 o al (215) 686-6880 o visitando uno de nuestros Centro de Servicios. Se permiten solicitudes para audiencias enviadas por correo, pero deben ser recibidas por la Oficina de Recaudaciones por Servicios de Agua en esta fecha o con posterioridad a ella; o
2. Puede presentar un formulario de petición ante la Junta de Revisión Fiscal (Tax Review Board, TRB) en el plazo de 60 días a partir de la fecha de este aviso. Los formularios se pueden solicitar en la TRB llamando al (215) 686-5216 o se los puede descargar en: http://www.phila.gov/trb/TRB_Petitions.html

La Oficina de Recaudaciones por Servicios de Agua o la TRB le comunicarán la fecha y el lugar donde se llevará a cabo la audiencia.

SI SOLICITA UNA AUDIENCIA, SU SERVICIO DE AGUA CONTINUARÁ HASTA QUE SE HAYA TOMADO UNA DECISIÓN FINAL.

LLAME AL 215-686-6880 SI ESTÁ ENFERMO O POR ALGUNA OTRA RAZÓN NO PUEDE CONCURRIR A LA OFICINA DE RECAUDACIONES POR SERVICIOS DE AGUA EN PERSONA O SI NECESITA MÁS INFORMACIÓN O UNA EXPLICACIÓN DE SUS DERECHOS.



CITY OF PHILADELPHIA
DEPARTMENT OF REVENUE
WATER REVENUE BUREAU