

From: [Jacquelyn Brown](#)
To: [WaterRateBoard](#)
Subject: Water Rate Hike Protest
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It is the cruelest joke. The Philadelphia Water Department (PWD) wants to punish us for saving water by charging us more for using less. PWD claims it was unable to bring in sufficient revenue to provide safe water service to the citizens in the last increase, so they're going to just keep doggin' us for more money until they get the amount they initially wanted.

The moral of this story is: No matter what the issue, vote "no" on all ballot questions, because the devil is in the details. With ballot questions, there are no hearings to give proper context to City Council's intent. Ballot questions are an nebulous way to reduce complex issues and processes to 3-5 lines. The electorate winds up with the unexpected. We voted "yes" to the Water, Sewer & Storm Water Rate Board (the board).

I have serious questions regarding the "independence" of the board. Is it/can it be "independent" when the current and previous mayors have appointed their subordinates - City Treasurers to it? Independent of what/whom? the water customers? City Council? Who confirms the mayor's appointments - PWD? Would Mayor Kenney appoint an unemployed/underemployed/TAP eligible member as a

counterbalance to the City Treasurer's \$145,000 annual salary?

If it were "independent", is that good for water customers? Can citizens tell them what to do? No. The board makes up their own rules, because they are "independent". Furthermore, they change their rules when they want to, as they did in the "public hearing" held on 9/8/17, that, according to their record, was attended by 10 people:

- four (out of 5) members of the board;
- the board's attorney, who is an employee of the City of Philadelphia;
- the Water Department Commissioner;
- the Water Department's attorney;
- an employee of the water department finance division (city employee);
- two Community Legal Services Public Advocates;
- the Director of Government Affairs and Policy for the Water Department

What connotation should we draw from the Report of the Board's Hearing on the Board's Proposed Regulations' "Nobody objected to the amended regulations at or prior to the hearing"? Does that connote agreement with or denial of responsibility for?

Was the “public” there? The record does not say; I doubt it. I doubt the public was invited to attend. Although the regulations that the board adopted on 9/8/17 require the board to “post notice of the proposed changes in rates and charges, including the estimated average percentage Small User bill increase, in conspicuous locations in all Water Department and Water Revenue Bureau offices that accept customer payments or that provide customer payments or that provide customer walk-in service”, they did not post any such notice of their most recent proposal in the site that I monitored - the Municipal Services Building - and judging from the attendance at the various public hearings for the current rate hike proposal, I doubt that the board published notices at any of the other sites. I did not see anything in the Philadelphia Inquirer until the day of the first hearing. I have concluded that the board is disinterested in what water customers think about their rate increase proposal.

Do we know what PWD did with the last 10% water rate hike that was approved for 2016 and 2017? Are 4 people sufficient to make such an important decision for the city? Do they need a quorum to make a decision? What is a quorum? The regulations do not say.

I could go on and on. Inasmuch as the board's composition and process is capricious, opaque and consequently, untenable to the point of egregiousness, I must concur with the demands made by the Workers Benefit Council:

- that the Philadelphia Water Department (PWD) implement a year-round moratorium on water shutoffs for any household at or below 300% of the federal poverty level;
- that the PWD reconnect, without reconnection fees, any household at or below 300% of the federal poverty level that has been disconnected, and establish a reasonable payment plan;
- that the City of Philadelphia end any practice of seizure or foreclosure of residences as a means of forcing payment of water bill arrearages;
- that PWD change the eligibility guidelines for TAP to 300% of the federal poverty guidelines;
- **AND MOST IMPORTANTLY, THAT THE BOARD DENY PWD'S RATE HIKE PROPOSAL.**

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Jacquelyn Brown

Know Justice; Know Peace