

DEFINITIONS AND INSTRUCTIONS

1. In answering these interrogatories and request for documentation, please furnish all information that is known or available to you, regardless of whether the information is possessed directly by you or by your agents, representatives, consultants, or, unless privileged, by your attorney or their agents, employees, representatives, or consultants.

2. If any of these interrogatories or request for documentation cannot be answer in full at this time, please answer the interrogatory to the extent possible and specify the reason for your inability to answer the remainder of the interrogatory.

3. If you withhold any requested information on a claim of privilege or work-product protection, or for any reason, state with respect to such information: (1) the substance of the information, (2) the nature and basis of the privilege asserted or any other reason for withholding the information, and provide an answer containing the information which is required by the interrogatory and which is not subject to the claimed privilege or protection.

4. Unless otherwise indicated, “Department” or “PWD” refers to the Philadelphia Water Department, its parents, subsidiaries, affiliates, predecessors, and successors and each of their respective past or present officers, directors, employees, consultants and agents, and any person acting or purporting to act on their behalf.

5. Unless otherwise indicated, “CLC” refers to Drexel University’s Community Lawyering Clinic.

6. These interrogatories shall be deemed to be continuing. PWD is obliged to change, supplement and correct all answers to interrogatories to conform to available information; including such information as first becomes available to PWD after the answers hereto are filed.

7. The answers provided should first restate the question or request and also identify the person(s) supplying the information.

8. If any objection is raised to any part of these interrogatories, all other unobjected to subparts of that interrogatory, or other interrogatories and their subparts must be answered within the time limits set.

9. If the information requested by an interrogatory of the Set I is included in the answer to a prior interrogatory, please specifically identify the prior interrogatory and answer as well as indicate which portion of that answer is also responsive to the subsequent interrogatory.

**Interrogatories
& Requests for Production of Documents: Set I**

- I-1. Please provide a geographic breakdown of PWD residential customers, per month or by year from FY'12 to present, including but not limited to counsel districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including but not limited to, PWD maintenance districts, or PWD pressure district.
- I-2. Please provide a geographic breakdown of PWD residential customers shutoffs, per month or by year from FY'12 to present, including but not limited to counsel districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including but not limited to, PWD maintenance districts, or PWD pressure district.
- I-3. Please provide all relevant criteria that are taken into consideration when a water service shut-off occurs.
- I-4. Please provide the most common reasons that water service shut-offs occur.
- I-5. Please provide the most common reasons that PWD closes a residential customer account.
- I-6. Please provide information on commercial delinquent customers including; your biggest commercial delinquent customer and the monetary amount they owe.
- I-7. Please provide what documentation is required to establish a residential customer account with PWD.
- I-8. Please provide what documentation is required to establish that someone is an occupant with ownership interest.
- I-9. Please provide what documentation is required to establish that someone is an occupant without ownership interest.