



## 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 II 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 II**

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- I-1. Please advise us what training, if any, the Philadelphia Water Department (PWD) provides to and/or requires of those employees who interact with customers or potential customers.
- I-2. Please provide us with any documents or records, including but not limited to legal memoranda, employee manuals, handouts, or other training materials, that describe PWD's policy on what documentation is required to establish new residential customer accounts.
- I-3. Please provide information regarding the training that employees receive on what documentation is required to open a residential customer account.
- I-4. Please provide us with any documents or records, including but not limited to legal memoranda, employee manuals, handouts, or other training materials that describe PWD's policy addressing how its staff should interact with a customer's legal representative, including but not limited to whether there are any restrictions that prevent a legal representative from attending meetings (on behalf of or with their client) in order to aid their client in the process of becoming a PWD customer.
- I-5. Please provide us with any documentation, including but not limited to legal memoranda, policy papers, case law, statute, regulation or other written justification for why the PWD believes that debt from delinquency on water bills attaches to the property (in rem) verses the individual account holder (in personam).
- I-6. Please provide any documents or records, including but not limited to memoranda, policy papers, administrative guidelines, and regulations, that described the PWD's prioritization in debt collection, including but not limited to whether PWD distinguishes between delinquent residential customers versus commercial or industrial customers when shutting off water.
- I-7. Please provide any documentation, including but not limited to legal memoranda, policy papers, case law, statute, regulation or other written justification, that describe the PWD's policy delineating what infrastructure a residential customer is responsible for as opposed to PWD.
- I-8. Please provide information on top twenty commercial delinquent customers including the monetary amount they owe.
- I-9. Please provide information on top twenty industrial delinquent customers including the monetary amount they owe.
- I-10. Please provide information on what fees for repair or installation of infrastructure, including but not limited pipes, shutoff valves, and meters, exist for residential customers.

- I-11. Please provide information on assistance programs, including but not limited to available grants, partial payment programs, installment agreements or plans, or other measures available to customers who are unable to pay costs or fees associated with infrastructure problems.
- I-12. Please provide the number of water shut offs of residential customer accounts for FY 2015, FY 2014, FY 2013, FY 2012, FY 2011, and FY 2010.
- I-13. In response to our last request for statistics on the number of shut offs in different areas of the City of Philadelphia, PWD provided us with shut offs by six Districts. Please provide an explanation of what geographic area is covered by each District.