

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

**PA-RDC-1.**

Reference paragraph 13.j of the Joint petition for Settlement of Phase 1 of the FY 2013-2016 Rate Proceeding (“[b]efore proposing the implementation of permanent new rates using a rate setting methodology that projects the Department’s revenue requirement over a period longer than one single fiscal year, the Department shall convene a collaborative workshop with Community Legal Services and respective Department and CLS experts, with the goal of agreeing upon an appropriate methodology to set budget and growth factors for use in the rate filing”), adopted and confirmed by PWD Commissioner on December 7, 2012:

- a. Please confirm the Department did not convene the aforementioned workshop in advance of submitting the Advance Notice.
- b. Please provide any anticipated date on or by which the Department intends to convene such workshop in advance of the Formal Notice.

**Response:** (a-b) The Department scheduled the aforementioned workshop via conference call on December 8, 2015. The Public Advocate and their designated experts (Michael Bleiweis and Exeter Associates) participated in the conference call where all rate filing assumptions set forth in PWD Exhibit 5 (Assumptions Provided to Public Advocate) were addressed. The rate filing assumptions were circulated to the parties prior to the conference call.

**Response Provided By:** Andre Dasent

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

**PA-RDC-2.** Reference the Side Letter dated September 28, 2012 between PWD and CLS, serving as Public Advocate. Please provide the final report of the Management Audit referenced in Paragraph 7 of the Side Letter.

**Response:** See, Raftelis Testimony (PWD Statement 8 at Exhibit HL-2).

**Response Provided By:** Andre Dasent

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

**PA-RDC-3.**

Reference Attachment D to the Joint Petition for Settlement of Phase 1 of the FY 2013-2016 Rate Proceeding (“Stipulation to Mediation Between PWD/WRB and PA).

- a. Please state whether the Department intends to respond to the Mediation Report regarding Tenant and Application Issues submitted to the Commissioners on December 11, 2015.
- b. If the answer to the foregoing is yes, please provide the anticipated date on or by which the Department intends to so respond.
- c. Please provide the anticipated date on or by which the department intends to commence mediation of the topic “delivery of deferred payment agreements” described in paragraph 6 of Attachment D.

**Response:**

(a-c) See attachment Response to RDC 3 for the Decision of the Philadelphia Water Commissioner and Revenue Commissioner as to the Mediation Report Regarding the Treatment of Tenant Arrears and Applications for Service (“Decision”). As described in the Stipulation referenced above, the mediation was to encompass four subject areas (1) improvement of informal dispute and hearings process; (2) the structure and delivery of the Water Revenue Assistance Program (WRAP); (3) the delivery of deferred payment agreements; and (4) the treatment of tenant arrears and applications for service. As of this writing, the mediation of subject areas (1) and (4) is completed. As noted in the Decision, subject areas (2) and (3) concerned the structure and delivery of WRAP and deferred payment agreements which were not mediated due to the introduction and eventual passage of Bill No. 140607-AA mandating the implementation of the new affordable rates program (I-WRAP) during the Mediation. Implementation of I-WRAP is scheduled to begin in FY 2018.

**Response Provided By:**

Andre Dasent