

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

PA-RDC-37 Reference: Davis. Testimony, page 2. Please provide all written documents of any nature prepared within the past 36 months by, for or on behalf of PWD/WRB that considers or otherwise discusses the “rate impacts on the customer base as a whole” of providing “delinquency relief for qualifying customers” through WRAP.

Response: RFC has not prepared any documents or analyses that consider the rate impacts of delinquency relief provided under the existing WRAP.

Response Provided By: Jon Davis, RFC

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PA-RDC-41 Reference: Davis. Testimony, page 3. Please list all quantitative indicators developed by and/or used by RFC by which the City can objectively determine the level at which program costs become “overly burdensome for City Ratepayers.”

- a. Provide all documents used to support the reasonableness of these indicators;
- b. Provide a copy of all prior written documents of any nature in which these indicators were applied to a low-income program for a client other than PWD/WRB;
- c. Provide a copy of all prior written documents of any nature in which these indicators were applied to a program other than a low-income program for a client other than PWD/WRB.

Response: Each City program alternative was analyzed as to estimated program cost and impact to ratepayers, as measured by impact on the average customer bill. Program costs and bill impact calculation are shown in the electronic model provided for Response PA-RDC-60. PWD reacted to these ratepayer impacts in making recommendations to City Council as to the structure of the Customer Affordability Program. No additional quantitative indicators were developed by RFC for the City. RFC finds it typical that municipal water and wastewater utilities consider the costs and customer impacts of a Customer Affordability Program during its design.

In a general sense, RFC has referred to affordability thresholds put forward by U.S. agencies, including EPA, as an objective means of assessing water and wastewater ratepayer burden. These thresholds are discussed in the publication *Affordability of Wastewater Service*, Water Environment Federation © 2007 (Table 6.2, p. 6-8). These thresholds have served as a point of reference on each of our cited affordability studies. RFC does not have ownership rights to work products produced for clients and is not authorized to disclose them.

Response Provided By: Jon Davis, RFC

