

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

PA-RDC-75. Reference: Kreps testimony, page 6. Please provide a copy of every instance in which a bond opinion or rating agency within your knowledge explicitly referenced the presence or absence of a low-income bill affordability program as a factor upon which it relied in issuing its opinion or rating. For each such document provided, list the page number at which the explicit reference to a low-income bill affordability program was made. Provide such documents within your custody or control for:

- a. Moody's Investor Services;
- b. Standard and Poor's Rating Services.

**Response:** Mr. Kreps did not provide testimony on low income assistance programs in this rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-76. Reference: Kreps testimony, page 6. Please provide a copy of every instance in which a bond opinion or rating agency within your knowledge explicitly referenced the affordability or unaffordability of monthly bills as a factor upon which it relied in issuing its opinion or rating. For each such document provided, list the page number at which the explicit reference to the affordability and/or unaffordability of bills was made. Provide such documents within your custody or control for:

- a. Moody's Investor Services;
- b. Standard and Poor's Rating Services.

**Response:** Mr. Kreps did not provide testimony on low income assistance programs in this rate filing.

**Response Provided By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-77. Reference: Locklear testimony, page 2. Please provide a copy of all written documents provided from a municipal water utility other than PWD, within the immediately preceding five years, assessing the “personnel resources” devoted by that utility to:

- a. The ongoing administration of an existing low-income bill affordability program, in terms of percentage of total program costs, cost per unit of water billed to residential customers, and/or absolute annual dollar amounts;
- b. The ongoing IT support for an existing low-income bill affordability program, in terms of percentage of total program costs, cost per unit of water billed to residential customers, and/or absolute annual dollar amounts;
- c. The upfront effort to implement a new low-income bill affordability program, in terms of percentage of Year 1 total program costs, cost per unit of water billed to residential customers, and/or absolute annual dollar amounts.

**Response:** The phrase quoted above “personnel resources” comes from a sentence on that page “We also assessed the personnel resources devoted to the system [Basis2] relative to those of other utility billing systems and industry standards.” The assessment of resources was specifically related to Basis2. We did not compile the information in a. through c. above for this engagement.

**Response Provided By:** Henrietta Locklear, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-78. Reference: Locklear testimony, page 2. Please provide a copy of all written documents provided from a municipal water utility other than PWD, within the immediately preceding five years, assessing the “personnel resources” devoted by that utility to:

- a. The ongoing administration of an existing low-income bill affordability program, in terms of annual FTEs and/or person-years of effort;
- b. The ongoing IT support for an existing low-income bill affordability program, in terms of annual FTEs and/or person-years of effort;
- c. The upfront effort to implement a new low-income bill affordability program, in terms of annual FTEs and/or person-years of effort.

**Response:** The phrase quoted above “personnel resources” comes from a sentence on that page “We also assessed the personnel resources devoted to the system [Basis2] relative to those of other utility billing systems and industry standards.” The assessment of resources was specifically related to Basis2. We did not compile the information in a. through c. above for this engagement.

**Response Provided By:** Henrietta Locklear, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-79. Reference: Locklear testimony, page 2: Please provide a copy of all written documents of any nature procured from a municipal utility other than PWD explicitly assessing, benchmarking or otherwise discussing the impact of a low-income rate affordability program on:

- a. Payment receipts;
- b. Credit application review;
- c. Collections efforts;
- d. Account management.

**Response:** We do not have any responsive documents. We did not undertake an analysis to estimate costs for implementation of a Customer Assistance Program in Philadelphia by benchmarking specific costs and processes against other utilities.

**Response Provided By:** Henrietta Locklear, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-80. Reference: Locklear testimony, page 3. For each of the 14 peer utilities studied, please provide all written documents, of any nature, procured from or about such utility explicitly reporting or otherwise discussing:

- a. The number of annual FTEs devoted to the ongoing administration of a low-income bill affordability program other than IT support;
- b. The number of annual FTEs devoted to IT support for a low-income bill affordability program;
- c. The impact of a low-income bill affordability program on payment receipts;
- d. The impact of a low-income bill affordability program on credit application review;
- e. The impact of a low-income bill affordability program on collection efforts;
- f. The impact of a low-income bill affordability on payment patterns.

**Response:** The results of the benchmarking survey were provided in Exhibit HL-2 of Henrietta Locklear’s testimony. Appendix E of the Management Audit. Page 6 of Appendix E contains the results of customer assistance program (CAP)-related questions. The information requested of utilities on CAP was the existence of a CAP (or CAPs) and the type of CAP, who manages the CAP, and how the CAP was funded. The information requested in a. through f. was not sought as a part of the benchmarking survey.

**Response Provided By:** Henrietta Locklear, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-81. Reference: Locklear testimony, page 4. Please provide a complete set of the four primary reports for residential customers used for the rate study:

- a. Service usage and billing;
- b. Water usage and billing;
- c. Revenue collection factors; and
- d. Payment patterns.

**Response:** All of the reports were provided as a part of the rate filing in Henrietta Locklear's testimony, Exhibit HL-2 Appendix D. In addition, all four reports were provided in electronic format in response to earlier requests for production of documents.

- a. In response to PA-EXE-39
- b. In response to PA-EXE-39
- c. In response to PA-EXE-41 and PA-RDC-6
- d. In response to PA-RDC-6

Both a. and b. are found in Report 1. The report not specifically requested here, Report 2, Bill Tabulation, was also previously provided in the rate filing and in response to PA-RDC-5.

**Response Provided By:** Henrietta Locklear, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-82. Reference: Locklear testimony, page 4. Please provide a detailed explanation of whether the recommended implementation of “a digital method for customers to interact with and communicate with the City” addresses programs and/or processes in addition to WRAP.

**Response:** The recommendation is primarily related to WRAP.

**Response Provided By:** Henrietta Locklear, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-83. Reference: Locklear testimony, page 4. Please provide a detailed explanation of whether the recommended implementation of a “workflow management system and an electronic management system to better manage files and information being transferred among individuals, units, and departments” addresses programs and/or processes in addition to WRAP.

**Response:** The recommendation is primarily related to WRAP.

**Response Provided By:** Henrietta Locklear, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-84. Reference: Locklear testimony, page 4. Please provide a detailed explanation of whether the “five person-years of effort” to implement a water affordability program assumes the implementation or non-implementation of:

- a. “Projects that are already high priority for WRB. . .in order to ensure that Basis2 continues to be able to function at the highest level possible.”
- b. The “efforts of WRB to upgrade the functionality of Basis2 to remove the need for a separate WRAP database”;
- c. A “digital method for customers to interact with and communicate with the City”;
- d. The “implementation of a workflow management system and an electronic management system to better manage files and information being transferred among individuals, units, and departments.”
- e. Correcting the finding that “staff resources are below what would be needed for optimal [Basis2] system performance”;
- f. An “increase [in] resources devoted to billing system maintenance, including hiring a fulltime database administrator (DBA) and additional business analytics and quality assurance support staff.”

**Response:** Assumes non-implementation of items a. through f.

**Response Provided By:** Henrietta Locklear, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-85. Reference: Locklear testimony, page 4. Please provide a detailed explanation of whether the \$2.8 million annual to cover two FTEs for IT support and 22 WRB positions for program administration for a low-income bill affordability program assumes the implementation or non-implementation of:

- a. “Projects that are already high priority for WRB. . .in order to ensure that Basis2 continues to be able to function at the highest level possible.”
- b. The “efforts of WRB to upgrade the functionality of Basis2 to remove the need for a separate WRAP database”;
- c. A “digital method for customers to interact with and communicate with the City”;
- d. The “implementation of a workflow management system and an electronic management system to better manage files and information being transferred among individuals, units and departments.”
- e. Correcting the finding that “staff resources are below what would be needed for optimal [Basis2] system performance”;
- f. An “increase [in] resources devoted to billing system maintenance, including hiring a fulltime database administrator (DBA) and additional business analytics and quality assurance support staff.”

**Response:** Assumes non-implementation of items a. through f.

**Response Provided By:** Henrietta Locklear, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-86. Davis testimony, page 3. Please provide a detailed explanation of why five FTE to develop the water affordability program costs \$1.1 million while two FTEs to provide IT support and 22 WRB positions for program administration costs \$2.8 million. Specifically identify all line-item expenses for each position.

**Response:** Please see responses to PA-RDC-50 and PA-RDC-51.

**Response Provided By:** Henrietta Locklear, RFC

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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PA-RDC-87. Reference: Locklear testimony, page 4. Please provide all written documents setting forth a cost-benefit or other “business case” analysis developed for and/or presented to PWD for:

- a. “Projects that are already high priority for WRB. . .in order to ensure that Basis2 continues to be able to function at the highest level possible.”
- b. The “efforts of WRB to upgrade the functionality of Basis2 to remove the need for a separate WRAP database”;
- c. A “digital method for customers to interact with and communicate with the City”;
- d. The “implementation of a workflow management system and an electronic management system to better manage files and information being transferred among individuals, units and departments”;
- e. Correcting the finding that “staff resources are below what would be needed for optimal [Basis2] system performance”;
- f. An “increase [in] resources devoted to billing system maintenance, including hiring a fulltime database administrator (DBA) and additional business analytics and quality assurance support staff.”

**Response:** Potential improvements to the processes were not subjected to a cost/benefit analysis and business case development as a part of the study.

**Response Provided By:** Henrietta Locklear, RFC

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PA-RDC-88. Reference: Locklear testimony, page 4. Please provide by Exhibit, Schedule and Line number all places where expenses are included in the current rate application for:

- a. “Projects that are already high priority for WRB. . .in order to ensure that Basis2 continues to be able to function at the highest level possible.”
- b. The “efforts of WRB to upgrade the functionality of Basis2 to remove the need for a separate WRAP database”;
- c. A “digital method for customers to interact with and communicate with the City”;
- d. The “implementation of a workflow management system and an electronic management system to better manage files and information being transferred among individuals, units and departments.”

**Response:** Information about Personal, Purchase of Services, Materials and Equipment related to the support of Basis2 can be found in the City’s Budget. Approved budget detail can be found on the Office of the Director of Finance's website, under financial reports, budget detail. <http://www.phila.gov/finance/reports-BudgetDetail.html>. The specific sections that contain support for Basis2 can be found in Book 1, PDF page 517-524, 539-542, 565-575.

**Response Provided By:** Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau

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PA-RDC-89. Reference: Locklear testimony, page 4. Please provide a complete list of electricity, natural gas and/or water utilities, known to RFC, which have cold weather shutoff protections for residential customers. For each utility listed, separately indicate whether:

- a. The utility is state-regulated or not-state regulated;
- b. The utility is electricity, natural gas, water or some combination thereof;
- c. The utility has “temperature-based moratorium criteria”;
- d. The utility’s cold weather protection is established by state statute, state agency regulation, or internal policy.

**Response:** The results of the benchmarking survey, which addressed moratorium periods, were provided in Exhibit HL-2 of Henrietta Locklear’s testimony. Appendix E of the Management Audit. Page 6 of Appendix E contains the results of the moratorium period-related questions. The information requested of utilities was whether there was a prohibition against shutoffs and the length of the prohibition.

The list of participants in the benchmarking survey is found on page 3 of Appendix E. Anonymity on the benchmarked metrics was promised to the participating utilities.

With the exception of the other utilities serving Philadelphia (clearly identified in the report and state-regulated) all other utilities in the survey sample are locally regulated (i.e., by Boards, City Councils or similar). As the text on page 6 of Exhibit E describes, three utilities used temperature-based criteria. We did not request information relating to d. above.

**Response Provided By:** Henrietta Locklear, RFC