

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

**PA-RDC-25 (Supplemental Response).** Reference: Kreps. Exhibit BK-1. From the projects listed in “Relevant project experience,” as well as from “other relevant project experience,” please identify each project in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. For each identified project, please provide a single copy of all written work-products (e.g., testimony, report, memo PowerPoint) that sets forth such consideration and/or discussion.

**Response:** Mr. Kreps has not testified on the subject of the design and/or funding of low income assistance programs or the affordability of water, wastewater or stormwater service in this proceeding or previous rate proceedings. Mr. Kreps has served in a lead role in engagements tasked with a review of Affordability Programs for the City of Richmond, Virginia, the City of Jackson, Mississippi and the Northeast Ohio Regional Sewer District. RFC cannot release any work products from these engagements without a release from the client. RFC is a Registered Municipal Advisor with the SEC and MSRB under the Dodd-Frank Wall Street Reform and Consumer Protection Act. As a part of the requirements of registration, we have compiled a procedures manual that speaks to our duties to keep client information confidential.

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

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**PA-RDC-26 (Supplemental Response).** Reference: Kreps. Exhibit BK-1. For each of the speaking engagements listed, please identify each one in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. For each identified speaking engagement, please provide a single copy of all written work-products (e.g., speech, PowerPoint, underlying article/report) that sets forth such consideration and/or discussion.

**Response:** No speaking engagements have been identified where Mr. Kreps explicitly addressed the subject of the design and/or funding of low income assistance programs or the affordability of water, wastewater or stormwater service. There are no identified speaking engagements or associated work products to provide in response to this data request.

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

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**PA-RDC-27 (Supplemental Response).** Reference: Kreps. Exhibit BK-1. For each publication for which the witness was an author, co-author or contributor, whether a report, memo, article, book chapter or other publication of any nature, please identify each one in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or addressed. For each identified publication, please provide a single copy of the publication that sets forth such consideration and/or discussion.

**Response:** Mr. Kreps did not provide testimony concerning the design and/or funding of low income assistance programs or the affordability of water, wastewater or stormwater service in this rate proceeding or previous rate proceedings. There are no publications related to above subject matter to provide in response to this data request.

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

**RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES AND REQUESTS FOR  
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**PA-RDC-28 (Supplemental Response).** Reference: Locklear. Exhibit HL-1. From the projects listed in “relevant project experience,” as well as from the “other relevant project experience,” please identify each project in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. For each identified project, please provide a single copy of all written work-products (e.g., testimony, report, memo PowerPoint) that sets forth such consideration and/or discussion.

**Response:** Ms. Locklear has not testified on the subject of the design and/or funding of low income assistance programs or the affordability of water, wastewater or stormwater service in this proceeding or previous rate proceedings. There are no identified projects or associated work products related to the above subject matter to provide in response to this data request.

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

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**PA-RDC-29 (Supplemental Response).** Reference: Locklear. Exhibit HL-1. From each of the speaking engagements listed, please identify each one in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or addressed. For each identified speaking engagement, please provide a single copy of all written work-products (e.g., speech, PowerPoint, underlying article/report) that sets forth such consideration and/or discussion.

**Response:** No speaking engagements have been identified where Ms. Locklear explicitly addressed the design and/or funding of low-income rate assistance programs or the affordability of water, wastewater or stormwater service. There are no identified speaking engagements or associated work products related to the above subject matter to provide in response to this data request.

**Response By:** Jon Davis, RFC

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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**PA-RDC-30 (Supplemental Response).** Reference: Locklear. Exhibit HL-1. For each publication for which the witness was an author, co-author or contributor, whether a report, memo, article, book chapter or other publication of any nature, please identify each one in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or addressed. For each identified publication, please provide a single copy of the publication that sets forth such consideration and/or discussion.

**Response:** Ms. Locklear did not provide testimony concerning the design and/or funding of low-income assistance programs or the affordability of water, wastewater or stormwater service in this rate proceeding or previous rate proceedings. There are no publications related to the above subject matter to provide in response to this data request.

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

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**PA-RDC-32 (Supplemental Response).** Reference: Kreps. Testimony, page 1. From each client listed, please identify each one for whom you prepared a written work product in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. Please provide a copy of each written work product so identified.

**Response:** Mr. Kreps did not provide testimony related to the design and/or funding of low income assistance programs or the affordability of water, wastewater or stormwater service in this rate proceeding or previous rate proceedings. There are no identified projects or associated work product related to the above subject matter to provide in response to this data request.

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

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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**PA-RDC-33 (Supplemental Response).** Reference: Locklear. Testimony, page 1. From each client listed, please identify each one for whom you prepared a written work product in which the design and/or funding of a low-income rate assistance program, and/or the affordability of water, wastewater or stormwater service, was explicitly considered and/or discussed. Please provide a copy of each written work product so identified.

**Response:** Ms. Locklear did not provide testimony related to the design and/or funding of low income rate assistance programs or the availability of water, wastewater or stormwater service in this rate proceeding or previous rate proceedings. There are no identified projects or associated work product related to the above subject matter to provide in response to this data request.

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



**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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**PA-RDC-75 (Supplemental Response).** 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 or undertake related research on low income assistance programs in this rate proceeding or previous rate proceedings. There are no documents to provide in response to this data request.

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

**RESPONSE TO PUBLIC ADVOCATE'S INTERROGATORIES AND REQUESTS FOR  
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**PA-RDC-76 (Supplemental Response).** 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 or undertake related research on low income assistance programs in this rate proceeding or previous rate proceedings. There are no documents to provide in response to this data request.

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