

**RESPONSE TO TENANT UNION REPRESENTATIVE NETWORK'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

TURN-I-1. Please provide a geographic breakdown of PWD tenant customers, by month or by year from FY'12 to present, including, but not limited to council districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including, but not limited to, PWD maintenance districts, or PWD pressure district.

Response: Please note there are no reports available that capture this data.

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

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TURN-I-2. Please provide a geographic breakdown of PWD tenants who requested service in their name and were rejected and the reasons for the rejection, by month or by year from FY' 12 to present, including, but not limited to council districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including, but not limited to, PWD maintenance districts, or PWD pressure district.

Response: Please note there is no data available to respond to this Interrogatory.

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

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TURN-I-3. Please provide a geographic breakdown of the number of occupants of properties serviced by PWD who requested relief pursuant to USTRA, by month or by year from FY' 12 to present, including, but not limited to council districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including, but not limited to, PWD maintenance districts, or PWD pressure district.

Response: Please note there is no data available to respond to this Interrogatory since "occupants" are not eligible for relief pursuant to USTRA, only tenants as defined in 68 P.S. § 399.2.

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

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TURN-I-4. Please provide a geographic breakdown of the number of occupants of properties serviced by PWD who requested relief pursuant to USTRA and were rejected and the reasons for the rejection, by month or by year from FY' 12 to present, including, but not limited to council districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including, but not limited to, PWD maintenance districts, or PWD pressure district.

Response: See response to TURN-I-3.

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

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TURN-I-5. Please provide a geographic breakdown of occupants of properties serviced by PWD who had their utilities maintained or restored pursuant to USTRA, by month or by year from FY'12 to present, including, but not limited to council districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including, but not limited to, PWD maintenance districts, or PWD pressure district.

Response: See response to TURN-I-3.

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

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TURN-I-6. Please provide a geographic breakdown of occupants of properties serviced by PWD who were provided relief pursuant to USTRA but failed to make the necessary payments, by month or by year from FY' 12 to present, including, but not limited to council districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including, but not limited to, PWD maintenance districts, or PWD pressure district.

Response: See response to TURN-I-3.

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

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TURN-I-7. Please provide a geographic breakdown of the outstanding balances of PWD customers at the time the residential occupants of their properties were provided relief pursuant to USTRA, by month or by year from FY'12 to present, including, but not limited to council districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including, but not limited to, PWD maintenance districts, or PWD pressure district.

Response: See response to TURN-I-3.

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

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TURN-I-8. Please provide the PWD protocols and procedures for determining whether or not the occupants of a property are to be notified of their rights under USTRA before and/or after a water shut-off takes place, including copies of all USTRA-related notices sent to landlord ratepayers and tenants.

Response: Please note there are no documents available to respond to this Interrogatory since “occupants” are not eligible for relief pursuant to USTRA, only tenants as defined in 68 P.S. § 399.2. Additionally, see attached copies of all USTRA-related notices sent to landlord ratepayers and tenants.

Response Provided by: Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau and Shawn Heslin, Revenue Collection Bureau

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TURN-I-9. Please provide a list and description of what documentation is required by the PWD to establish that an occupant is eligible for the protections of USTRA.

Response: Please note there are no documents available to respond to this Interrogatory since “occupants” are not eligible for relief pursuant to USTRA, only tenants as defined in 68 P.S. § 399.2.

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

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TURN-I-10. Please provide the PWD protocols and procedures for notifying the occupants of a property of their rights under USTRA before and/or after a water shut-off takes place.

Response: See response to TURN-I-9.

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

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TURN-I-11. Please provide the PWD materials, protocols and procedures for training appropriate staff, including those providing customer service, regarding the requirements imposed by USTRA on customers and PWD.

Response: See attached documents from the Water Revenue Bureau and Revenue Collection Bureau.

Response Provided by: Michelle Bethel and Mark Harvey, Philadelphia Water Revenue Bureau and Shawn Heslin, Revenue Collection Bureau

**RESPONSE TO TENANT UNION REPRESENTATIVE NETWORK'S
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TURN-I-12. Please provide a geographic breakdown of the number and amounts of judgments in foreclosure actions against PWD residential customers prosecuted to sheriff sale, by month or by year from FY' 12 to present, including, but not limited to council districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including, but not limited to, PWD maintenance districts, or PWD pressure district.

Response: Please note there are no documents available to PWD or WRB to respond to this Interrogatory.

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

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TURN-I-13. Please provide a geographic breakdown of the number and amounts of judgments in foreclosure actions against PWD residential customers prosecuted to sheriff sale on properties occupied by persons who were provided relief pursuant to USTRA, by month or by year from FY'12 to present, including, but not limited to council districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including, but not limited to, PWD maintenance districts, or PWD pressure district.

Response: Please note there are no reports available that capture this data.

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TURN-I-14. Please provide a geographic breakdown of the number and projected amounts of judgments in foreclosure actions against PWD residential customers prosecuted to sheriff sale on properties occupied by persons who were provided relief pursuant to USTRA, by month or by year from FY'12 to present, including, but not limited to council districts, police districts, zip code, census track, political wards, etc. or any internal department classifications including, but not limited to, PWD maintenance districts, or PWD pressure district.

Response: Please note there are no reports available that capture this data.

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TURN-I-15. Please provide a copy of the contract between PWC and the Revenue Collection Bureau and any other contracts between PWC and any other entities tasked with administering USTRA.

Response: Please see attached contract between the City of Philadelphia and Revenue Collection Bureau.

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

**RESPONSE TO TENANT UNION REPRESENTATIVE NETWORK'S
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TURN-I-16. Reference the City of Philadelphia Five Year Financial and Strategic Plan for Fiscal Years 2017-2021 presented to City Council on March 3, 2016, Law Department Plans, page 90, "Utilize Sheriff Sale Process to Collect Water Receivables."

a. Please provide any reports relating to the referenced "earlier pilot program...completed in FY16 [that] demonstrated the revenue generation potential of this initiative."

b. Please provide any cost-benefit analysis of this plan to "Utilize Sheriff Sale Process to Collect Water Receivable" "in the case of USTRA tenant protected properties" including the impact on tenants, the cost of relocation of tenants, and the impact on city services due to displaced tenants.

Response: a. See response to TURN-I-12.

b. Please note there are no documents available to PWD or WRB to respond to this Interrogatory.

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

**RESPONSE TO TENANT UNION REPRESENTATIVE NETWORK'S
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TURN-I-17. Reference the City of Philadelphia Five Year Financial and Strategic Plan for Fiscal Years 2017-2021 presented to City Council on March 3, 2016, Law Department Plans, page 161, "Increased Sheriff Sales."

a. Please provide any reports relating to the decision to expand beyond vacant properties the referenced "FY16...successful pilot program [that] selected properties for Sheriff Sale based on the amount of Water debt owed. This is particularly effective for vacant properties and land where water shut off is not a viable collection tool."

b. Please provide any cost benefit analysis of this plan to increase sheriff sales, including any analysis of the likelihood of payment of water bills by future purchasers and any procedures to prevent delinquent owners from purchasing the properties through a straw buyer.

Response: a. See response to TURN-I-12.

b. Please note there are no documents available to PWD or WRB to respond to this Interrogatory.

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