

**BEFORE THE PHILADELPHIA WATER, SEWER AND STORM WATER  
RATE BOARD**

**In the Matter of a Proposed Rate Increase in** :  
**Water, Sewer and Storm Water Rates** : **FY 2022-2023 Rates**

**Public Advocate's Interrogatories & Requests for Production of Documents**

**SET III**

- PA-III-1. By month for July 2017 through present, please provide the number of TAP enrollees whose income information was accepted for enrollment in TAP due to the automatic acceptance of income provisions of Philadelphia Code §19-1605(3)(i)(.2) (requiring acceptance of determinations of income and residency).
- PA-III-2. By month for July 2017 through present, please provide the number of TAP enrollees whose residency information was accepted for enrollment in TAP due to the automatic acceptance of residency provisions of Philadelphia Code §19-1605(3)(i)(.2) (requiring acceptance of determinations of income and residency).
- PA-III-3. Please identify and provide a detailed description of the municipal office that determines income-eligibility for the Philadelphia tax hardship assistance program.
- PA-III-4. Please provide a copy of all written correspondence, including e-mails, letters, memos or other written document of any nature, between PWD and/or WRB and the municipal office that determines income-eligibility for the Philadelphia tax hardship program that proposes, considers, evaluates or otherwise discusses any collaboration between the TAP and tax hardship assistance program with respect to determining income eligibility for the two programs.
- PA-III-5. Please compare and contrast the income-eligibility for the Philadelphia tax hardship assistance program and TAP.
- PA-III-6. Please provide a detailed description of all processes through which:
- a. Active WRAP participants are cross-checked against the Philadelphia tax hardship assistance program to determine income-eligibility for TAP;
  - b. Defaulted WRAP participants are cross-checked against the Philadelphia tax hardship assistance program to determine income-eligibility for TAP;
  - c. TAP applicants, irrespective of their current or former status as a WRAP participant, are cross-checked against the Philadelphia tax hardship assistance program to determine their income-eligibility for TAP.

PA-III-7. Please identify which date TAP participants are defined to begin their participation in TAP: (1) the date on which applicants submit a TAP application; (2) the date on which applicants are found to be eligible for TAP; or (3) some other date (please identify with specificity what “other” date is used).

PA-III-8. Please identify whether the date on which a TAP applicant is found to be income-eligible for TAP and the date on which a TAP applicant is enrolled in TAP differs. For any difference that exists between these two dates, provide a detailed explanation of the reason for the time difference.

PA-III-9. For TAP participants who experience a time lag between the date on which they submit a TAP application and the date on which they are enrolled in TAP, please provide a detailed description of what bills such applicants receive during the time after they submit a TAP application and before they are enrolled in TAP.

PA-III-10. By week, since July 1, 2017, provide the number of TAP enrollees by homeowner/tenant status.

PA-III-11. Please provide any budget document (or other written document of any nature) prepared in the period January 2017 to present:

- a. Projecting TAP participation by month;
- b. Presenting a side-by-side comparison of projected TAP participation versus actual TAP participation.

PA-III-12. Confirm or deny: The administrative costs associated with TAP are not subject to reconciliation through PWD’s TAP Rider. If denied, please identify in the Rate Rider the specific location at which the reconciliation of administrative costs is identified and/or discussed.

PA-III-13. By year, for each Fiscal Year 2017 to present, please identify the specific dollar amount of TAP administrative costs currently being collected in PWD base rates, disaggregated by:

- a. Wages;
- b. Benefits;
- c. Overhead (indicating how overhead was calculated);
- d. Information technology;
- e. Contingency (indicating how the contingency was calculated);
- f. Other (identifying with specificity what the “other” is).

PA-III-14. Please identify, by month since July 2017, the actual dollar amount of administrative costs expended on TAP since July 1, 2017, disaggregated by:

- a. Wages;
- b. Benefits;
- c. Overhead (indicating how overhead was calculated);
- d. Information technology;
- e. Contingency (indicating how the contingency was calculated);
- f. Other (identifying with specificity what the “other” is).

PA-III-15. Please provide a detailed explanation of how any TAP administrative costs currently being collected in PWD rates but which exceed TAP administrative costs actually expended will be treated for ratemaking purposes in future rate periods.

PA-III-16. Please provide a detailed explanation of the dollar amount by which the 25% “contingency” for TAP administrative costs currently being collected in PWD rates was accessed by month for each month July 2017 to present.

- a. Identify with specificity the component(s) of TAP administrative which have caused the need to draw upon the 25% contingency for TAP administrative costs.

PA-III-17. Please provide payment pattern reports by month for July 2017 to present limited to TAP participants.

PA-III-18. Please define the terms:

- a. Billings
- b. Payments
- c. Total percent collected

PA-III-19. In assessing collections for PWD, please:

- a. Define the term “receipts”
- b. Separately indicate how the distinction between “billings” and “receipts” is used in calculating rate levels.

PA-III-20. Please provide a copy of all agendas and all minutes of TAP Advisory Committee meetings from July 1, 2017 to present.

PA-III-21. Please provide a copy of all written presentations, memos or other written documents of any nature from PWD or WRB (including their consultants) provided to TAP Advisory Committee members at an Advisory Committee meeting from July 1, 2017 to present.

PA-III-22. Please provide a copy of all written presentations, memos or other written documents of any nature from PWD or WRB (including their consultants) provided to City Council, the Water Board, or any other Philadelphia municipal entity or official regarding TAP from July 2017 to present.

PA-III-23. Please provide a copy of all presentations by a PWD or WRB official (including Raftellis and/or Black and Veatch personnel testifying in this proceeding) to a conference, seminar, or other public or industry gathering regarding TAP from July 2017 to present.

PA-III-24. Please provide a copy of all publications, reports, or other published written documents authored by a PWD or WRB official (including Raftellis and/or Black and Veatch personnel testifying in this proceeding), and published regarding TAP, from July 2017 to present.

PA-III-25. Please provide a single copy, for the period July 1, 2017 to present, of the following:

- a. Each daily and weekly customer assistance application processing report;
- b. Each report providing monthly program statistics;
- c. Each periodic cost of program report;
- d. Each annual City Council-required report; and
- e. Each other ad hoc and periodic reports to support management of TAP that has been requested and developed.

PA-III-26. Please provide a single copy, for the period July 1, 2017 to present, of the following:

- a. Each report reporting the number of TAP applications requested, by method requested;
- b. Each report reporting the number of TAP applications submitted, by method submitted;
- c. Each report reporting the number of applications by status change;
- d. Each report reporting the number of customers by program enrolled;
- e. Each report reporting TAP participation levels;
- f. Each report reporting TAP discount amounts;
- g. Each report reporting TAP bill payments.

PA-III-27. Please provide in Excel format the number of TAP participants as of the end of the month by month for each month January 2017 to present.

PA-III-28. Please provide the number of TAP exits, by reason for the exit, by month since July 2017 to present inclusive.

PA-III-29. Please provide by year for the years 2017 to present inclusive:

- a. Average number of confirmed low-income customers.
- b. Average number of estimated low-income customers.

For purposes of this and other questions using this term, a “confirmed low-income customer” is a customer that PWD knows, or has reason to know, is a customer with income at or below 150% of the Federal Poverty Level.

PA-III-30. In Excel format, provide a list of each Census Tract comprising, in whole or part, the PWD service territory.

PA-III-31. In Excel format, provide a list of each zip code comprising, in whole or part, the PWD service territory.

PA-III-32. In the aging reports maintained by PWD, provide for each “route” referenced:

- a. The zip codes which, in whole or part, comprise that route;
- b. The Census Tracts which, in whole or part, comprise that route.

PA-III-33. In the collectability studies prepared by or for PWD, please provide a detailed explanation of what customers are included in the population labelled “TAP customers outside of TAP enrollment.”

PA-III-34. In the collectability studies prepared by or for PWD, please provide a detailed explanation of the distinction between “TAP customers outside of TAP enrollment” in the years prior to the implementation of TAP and “TAP customers outside of TAP enrollment” in the years subsequent to the implementation of TAP.

PA-III-35. In the collectability studies prepared by or for PWD, please provide a detailed explanation of how “TAP customers outside of TAP enrollment” were identified prior to Fiscal Year 2018.

PA-III-36. In the collectability studies prepared by or for PWD, please provide a detailed explanation of why customers who are labelled “senior citizen discount” are combined with customers who are labelled “TAP” for purposes of calculating collectability.

PA-III-37. Please provide a restatement of the collectability studies prepared by or for PWD with TAP customers separately stated (i.e., not combined with “senior citizen discount”).

PA-III-38. Please provide all collectability studies prepared by or for PWD with data through January December 2020.

PA-III-39. For each zip code, provide:

- a. The number of residential customers in that zip code;
- b. The number of confirmed low-income customers in that zip code; and
- c. The number of TAP participants served in that zip code.

PA-III-40. In Excel format, for the most recent 12 month period available, please provide any information that is available that is broken down geographically (e.g., zip code, Census Tract) regarding residential customers':

- a. Amount of billed revenue (in dollars);
- b. Payments (in dollars);
- c. Arrears (in dollars);
- d. Number of bills rendered;
- e. Number of payments received;
- f. Number of accounts in arrears;
- g. Number of disconnections;
- h. Number of reconnections.

If information is broken down by more than one geographic area, provide that information which is available on the most geographically disaggregated basis (e.g., Census Tract rather than zip code).