RESPONSE TO
PUBLIC ADVOCATE’S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1 - 106

Dated: March 2020
General Response to PA-SET-III:

Please note that much of the data and reports provided in response to the enclosed interrogatories were not used directly in the Cost of Service analysis. The requested data and reports were developed in response to questions asked by the Public Advocate.

Rate Proceeding Participants should refer to PWD Statements 6, 7A, and 7B for information regarding the data used as the basis for or in support of the development of the Water Department’s proposed rates and charges and related matters.
PA-III-1. PLEASE PROVIDE DEPARTMENT ACCOUNTS RECEIVABLE AGING REPORTS BY MONTH FOR THE MOST RECENT 24 MONTHS AVAILABLE, INCLUDING WITHIN EACH AGING BUCKET: (A) THE NUMBER OF ACCOUNTS; (B) THE DOLLARS OF RECEIVABLE; AND (C) THE AVERAGE BALANCE PER ACCOUNT.

A. SEPARATELY PROVIDE FOR NON-RESIDENTIAL ACCOUNTS;
B. SEPARATELY PROVIDE FOR RESIDENTIAL ACCOUNTS;
C. SEPARATELY PROVIDED FOR TAP PARTICIPANT ACCOUNTS.

RESPONSE:

Due to the voluminous nature of the request, PA-III-1 AR Aging by Route Report will be provided to Public Advocate upon request in CD form. Please note there are no reports available that capture data for “(C) the average balance per account.”

Additionally, there are no reports that separate the aging by non-residential and residential accounts as requested in PA-III-1A and PA-III-1B, so the aging is provided for all accounts. Further, PA-III-1 AR Aging by Route Report displays TAP participant accounts in summary form.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-2. PLEASE PROVIDE A USAGE DISTRIBUTION BY MONTH FOR THE MOST
RECENT 24 MONTHS AVAILABLE, INCLUDING WITHIN EACH
DISTRIBUTION RANGE: (A) THE NUMBER OF ACCOUNTS; (B) THE
AGGREGATE CONSUMPTION WITHIN THAT RANGE; (C) THE AVERAGE
CONSUMPTION WITHIN THAT RANGE; AND (D) THE AVERAGE BILL
WITHIN THAT RANGE.

A. SEPARATELY PROVIDE FOR RESIDENTIAL ACCOUNTS;
B. SEPARATELY PROVIDE FOR TAP PARTICIPANT ACCOUNTS.

RESPONSE:

The tiered usage reports for FY 2018 and 2019 are provided as PA-III-2_Response.xls.
They show the monthly maximum consumption, average consumption, number of bills,
volume of water usage, and total water usage charges within each tier of the current rate
structure. The average bill within each range is calculable based on the provided average
consumption values.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-3. PLEASE PROVIDE, BY YEAR FOR THE MOST THREE YEARS AVAILABLE, ALL COLLECTABILITY STUDIES PROVIDED ASSESSING THE RATE AT WHICH THE DEPARTMENT CONVERTS BILLINGS INTO COLLECTED REVENUE.

A. SEPARATELY PROVIDE FOR NON-RESIDENTIAL ACCOUNTS;
B. SEPARATELY PROVIDE FOR RESIDENTIAL ACCOUNTS;
C. SEPARATELY PROVIDE FOR TAP PARTICIPANT ACCOUNTS.

RESPONSE:

The FY 2019 Payment Patterns Report, originally provided in Raftelis’ direct testimony as Schedule RFC-6 and provided again here as PA-III-3_Response_AB.xls, addresses parts (a) and (b) of this request. Non-residential and Residential accounts are separated in the raw data tabs, each beginning with “FY.” The FY 2019 Low Income Billing & Payments Report provides similar data for TAP participants, addressing part (c) of this request. This report was originally provided in Raftelis’ direct testimony as Schedule RFC-9, and is provided again as PA-III-3_Response_C.xls.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
**PA-III-4.** PLEASE IDENTIFY EACH RESIDENTIAL CUSTOMER SERVICE FEE IMPOSED, INCLUDING ANY LATE PAYMENT CHARGE. SEPARATELY PROVIDE THE COST-JUSTIFICATION FOR SUCH FEE.

RESPONSE:

Miscellaneous charges related to lien fees, bad check fees and penalties for late payments are detailed in the table below.

<table>
<thead>
<tr>
<th>Description</th>
<th>Justification</th>
<th>Fee Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dishonored Check Fee</td>
<td>Philadelphia Code Section 19-2809(7)(f)</td>
<td>$20.00</td>
</tr>
<tr>
<td>Penalty for Late Payment</td>
<td>Penalty mandated by Philadelphia Code Section 19-1606(2).</td>
<td></td>
</tr>
</tbody>
</table>

(See next column for the relevant text of this section)

If current water or sewer rent charges are not paid within thirty (30) days after the due date of any bill, a penalty of 5% shall be imposed. Additional penalties shall be imposed and added to unpaid water or sewer rent charges, and their penalties, on the due date of the bill of each succeeding cycle, as follows:

* * *

(.3) monthly cycles – 1/2 of 1%, except that a period of thirty (30) days shall elapse before the first additional penalty shall be imposed.
RESPONSE PROVIDED BY:  Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-5. FOR EACH RESIDENTIAL CUSTOMER FEE IDENTIFIED IN RESPONSE TO
THE IMMEDIATELY PRECEDING QUESTION, PLEASE PROVIDE FOR
THE MOST RECENT 24 MONTHS AVAILABLE: (A) THE NUMBER OF
ACCOUNTS BEING CHARGED THAT FEE; AND (B) THE AGGREGATE
DOLLARS CHARGED FOR THAT FEE.

RESPONSE:

See response attachment PA-III-5 Fee Report.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-6. BY MONTH FOR EACH THE MOST RECENT 24 MONTHS AVAILABLE,
PLEASE PROVIDE FOR RESIDENTIAL ACCOUNTS:

(A) THE NUMBER OF NEW DEFERRED PAYMENT ARRANGEMENTS ENTERED INTO;

(B) THE AVERAGE DOWNPAYMENT (IN DOLLARS) OF DEFERRED PAYMENT ARRANGEMENTS ENTERED INTO DISAGGREGATED BY THE ARREARAGES AT THE TIME THE DEFERRED PAYMENT ARRANGEMENT IS SOUGHT;

(C) THE AVERAGE TERM (IN MONTHS) OF DEFERRED PAYMENT ARRANGEMENTS ENTERED INTO;

(D) THE AVERAGE DOLLAR AMOUNT OF ARREARS MADE SUBJECT TO THE DEFERRED PAYMENT ARRANGEMENT DISAGGREGATED BY THEIR TERM (IN MONTHS) OF THE NUMBER OF INSTALLMENT PAYMENTS;

(E) THE AVERAGE MONTHLY INSTALLMENT OF DEFERRED PAYMENT ARRANGEMENTS DISAGGREGATED BY THEIR TERM (IN MONTHS) OF THE NUMBER OF INSTALLMENT PAYMENTS;

(F) THE DISTRIBUTION OF NEW DEFERRED PAYMENT ARRANGEMENTS BY THEIR TERM (IN MONTHS) OF THE NUMBER OF INSTALLMENT PAYMENTS;

(G) THE NUMBER OF DEFAULTED DEFERRED PAYMENT ARRANGEMENTS;

(H) THE NUMBER OF DEFAULTED DEFERRED PAYMENT ARRANGEMENTS DISAGGREGATED BY THEIR TERM (IN MONTHS) OF THE NUMBER OF INSTALLMENT PAYMENTS;
(I) THE NUMBER OF COMPLETED (OR “SUCCESSFUL”) DEFERRED PAYMENT ARRANGEMENTS DISAGGREGATED BY THEIR TERM (IN MONTHS) OF THE NUMBER OF INSTALLMENT PAYMENTS.

RESPONSE:

See response attachment PA-III-6 Payment Agreement Report.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-7. PLEASE PROVIDE BY MONTH FOR THE MOST RECENT 24 MONTHS AVAILABLE, THE NUMBER OF:

A. FINAL NOTICES OF DISCONNECTION FOR NONPAYMENT (DISAGGREGATING BY AND EXPLAINING IF DIFFERENT “FINAL” NOTICES ARE PROVIDED) FOR RESIDENTIAL CUSTOMERS; AND

B. RESIDENTIAL DISCONNECTIONS FOR NONPAYMENT.

RESPONSE:

See response attachment PA-III-7 Shut Off Report.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-8.  PLEASE PROVIDE BY MONTH FOR THE MOST RECENT 24 MONTHS AVAILABLE:

A.  THE NUMBER OF ACCOUNTS RECONNECTED SUBSEQUENT TO A DISCONNECTION FOR NONPAYMENT.

B.  THE AVERAGE TIME BETWEEN DISCONNECTION AND RECONNECTION.

C.  A DISTRIBUTION IN REASONABLE BANDS OF HOW LONG A CUSTOMER WAS “OFF” THE SYSTEM (SUGGESTED BANDS; LESS THAN 1 DAY, 1-3 DAYS, 3-7 DAYS, 7-30 DAYS, MORE THAN 30 DAYS).

RESPONSE:

See response attachment PA-III-8 Restoration Report.

Please note there are no reports available that capture data for “(B) the average time between disconnection and reconnection” and “(C) a distribution in reasonable bands of how long a customer was “off” the system (suggested bands; less than 1 day, 1-3 days, 3-7 days, 7-30 days, more than 30 days).”

RESPONSE PROVIDED BY:  Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-9. OF THE RESIDENTIAL ACCOUNTS RECEIVING A NOTICE OF AN IMPENDING DISCONNECTION FOR NONPAYMENT, FOR EACH MONTH FOR THE MOST RECENT 24 MONTHS AVAILABLE, PLEASE PROVIDE:

(A) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR SERVICE DISCONNECTED BY THE DATE SPECIFIED IN THE DISCONNECT NOTICE;

(B) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR SERVICE DISCONNECTED FOR NONPAYMENT AFTER RECEIVING A DISCONNECT NOTICE FOR NONPAYMENT THAT VOLUNTARILY TERMINATED THEIR ACCOUNTS;

(C) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR SERVICE DISCONNECTED BECAUSE THE CUSTOMER PAID THEIR BILLS IN FULL PRIOR TO THEIR SCHEDULED DISCONNECTION;

(D) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR SERVICE DISCONNECTED BECAUSE THE CUSTOMER PAID THEIR BILLS LESS THAN IN FULL BUT SUFFICIENT TO AVOID THEIR SCHEDULED DISCONNECTION;

(E) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR SERVICE DISCONNECTED EVEN THOUGH THEY RETAINED AN ARREARS THAT WAS SUFFICIENT LARGE (OR SUFFICIENTLY OLD) TO TRIGGER A DISCONNECTION; AND

(F) THE TOTAL NUMBER OF ACCOUNTS ON WHICH ACCOUNT NO PAYMENTS WERE MADE PRIOR TO THE ISSUANCE OF THE NEXT BILL AFTER ISSUANCE OF THE DISCONNECT NOTICE.
RESPONSE:

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

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-10. ASSUME FOR PURPOSES OF THIS INFORMATION REQUEST THAT A
RESIDENTIAL BILL IS RENDERED ON DAY 1. ASSUME FURTHER THE
BILL REMAINS UNPAID. PROVIDE THE TIMELINE OF EACH
COLLECTION STEP UNTIL THE BILL IS FINAL-BILLED FOR
NONPAYMENT. IDENTIFY THE DAY ON WHICH EACH STEP OF THE
COLLECTION PROCESS CAN BE EXPECTED TO OCCUR.

RESPONSE:

See response attachment PA-III-10 Debt Collection Process.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-11. FOR THE MOST RECENT 24-MONTH PERIOD AVAILABLE, BY MONTH
FOR RESIDENTIAL ACCOUNTS, PLEASE PROVIDE:

A. WHAT PERCENTAGE OF BILLS WAS PAID BY THE DUE DATE OF
THE BILL;

B. WHAT PERCENTAGE OF BILLS WAS PAID BY THE TIME THE
NEXT MONTH’S BILL IS RENDERED;

C. WHAT PERCENTAGE OF THOSE BILLS WAS PAID BY THE TIME
THE SECOND SUBSEQUENT BILL IS RENDERED; AND

D. WHAT PERCENTAGE OF THOSE BILLS WAS PAID BY THE TIME
THE THIRD SUBSEQUENT BILL IS RENDERED.

RESPONSE:

See response attachment PA-III-11 Payment Pattern Report.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-12. IN A TYPICAL MONTH, WITH DAY 1 BEING THE DAY A BILL IS ISSUED,
PLEASE PROVIDE THE PERCENTAGE OF RESIDENTIAL ACCOUNTS
MAKING PAYMENTS BY DAY THROUGH DAY 60. IF REPORTING OF
SUCH DATA IS ONLY BY A TIME PERIOD OTHER THAN A DAY (E.G.,
WEEKLY), PROVIDE BY THE REPORTING BY THAT TIME PERIOD.

RESPONSE:

Please note there are no reports available that capture this data daily. See response to PA-
III-11 for available data.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-13. PLEASE PROVIDE BY MONTH FOR EACH MONTH FOR THE MOST RECENT 24 MONTHS AVAILABLE:

A. THE AVERAGE BILL FOR ALL RESIDENTIAL ACCOUNTS;

B. THE AVERAGE ARREARS OF RESIDENTIAL ACCOUNTS IN ARREARS;

C. THE AVERAGE BILL OF RESIDENTIAL ACCOUNTS IN ARREARS;

D. THE TOTAL DOLLARS OF RESIDENTIAL ARREARS;

E. THE PERCENTAGE OF RESIDENTIAL DOLLARS CONSTITUTING ARREARS;

F. THE PERCENTAGE OF BILLED RESIDENTIAL ACCOUNTS HAVING ARREARS; AND

G. THE AVERAGE ARREARS OF ALL RESIDENTIAL ACCOUNTS DISCONNECTED FOR NONPAYMENT IN THAT MONTH.

RESPONSE:

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

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-14. **PLEASE PROVIDE A COPY OF A TYPICAL RESIDENTIAL NOTICE OF DISCONNECTION FOR NONPAYMENT PRINTED IN EACH OF THE FOLLOWING MONTHS:**

A. APRIL 2019;
B. AUGUST 2019.
C. NOVEMBER 2019;
D. JANUARY 2020.

IF MORE THAN ONE TYPE OF RESIDENTIAL DISCONNECTION NOTICE IS ISSUED, PROVIDE A COPY OF EACH.

**RESPONSE:**

See response attachment PA-III-14 Shut Off Notices. Please note that no residential shut off notices for nonpayment are issued in November 2019 or January 2020 (during winter moratorium), therefore there are no documents responsive to subsections (C) and (D) above.

**RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau
**PA-III-15.** FOR EACH MONTH FOR THE MOST RECENT TWELVE MONTHS AVAILABLE, PLEASE PROVIDE:

A. THE AVERAGE BILL FOR RESIDENTIAL ACCOUNTS AT EXISTING RATES PROVIDED IN SUFFICIENT DETAIL (INCLUDING ALL INPUT VARIABLES) TO PERMIT REPPLICATION.

B. THE SAME BILL INFORMATION USING THE PROPOSED RATES RATHER THAN THE EXISTING RATES.

**RESPONSE:**

As detailed in PWD Statement 6, Schedule RFC-1, Page 1, the typical residential customer utilizes 5 ccf (or 500 cf) of water per month. The majority of residential customers have 5/8” service lines. The requested information is provided on page 12 of PWD Statement 7A, Schedule BV-5: Water and Wastewater Cost of Service Report and is reproduced below. The table provides the typical bills based upon the existing (FY 2020) rates as well as the proposed FY 2021 FY 2022 rates.
## USAGE CHARGES

<table>
<thead>
<tr>
<th></th>
<th>FY 2020</th>
<th>FY 2021</th>
<th>FY 2022</th>
</tr>
</thead>
<tbody>
<tr>
<td>Water Quantity Charge</td>
<td>$22.76</td>
<td>$24.64</td>
<td>$25.87</td>
</tr>
<tr>
<td>Sewer Quantity Charge</td>
<td>$16.21</td>
<td>$17.52</td>
<td>$18.83</td>
</tr>
<tr>
<td><strong>Subtotal</strong></td>
<td>$38.97</td>
<td>$42.16</td>
<td>$44.70</td>
</tr>
</tbody>
</table>

## STORMWATER CHARGES

- $15.80
- $17.80
- $19.15

## SERVICE CHARGES

For a 5/8-inch meter:
- $12.22
- $12.69
- $13.34

**TOTAL MONTHLY BILL**

- $66.99
- $72.65
- $77.19

The above figures for are based upon rates effective September 1st of each fiscal year. The above usage figures utilize current TAP-R rates of $0.71/Mcf for water quantity charges and $1.16/Mcf for sewer quantity charges. Stormwater charges include both the stormwater management service charge (SWMS) and Billing & Collection charges. Service charges include both water and sewer charges for a 5/8-inch meter.

The existing and proposed rates are detailed in PWD Exhibit 3 and summarized on page 11 of PWD Statement 7A, Schedule BV-5: Water and Wastewater Cost of Service.

**RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC
PA-III-16. BY MONTH FOR THE MOST RECENT 24 MONTHS AVAILABLE, PLEASE PROVIDE:

A. THE DOLLARS OF RESIDENTIAL LATE FEE REVENUE COLLECTED; AND

B. THE NUMBER OF RESIDENTIAL ACCOUNTS PAYING A LATE CHARGE.

RESPONSE:

See response attachment PA-III-16 Late Fee Report.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-17. PLEASE PROVIDE A SINGLE COPY OF ALL STUDIES WITHIN PWD’S CUSTODY OR CONTROL DOCUMENTING THE EFFECTIVENESS OF A LATE PAYMENT CHARGE AS AN INCENTIVE TO PAY FOR:

A. RESIDENTIAL UTILITY CUSTOMERS.

B. LOW-INCOME RESIDENTIAL CUSTOMERS.

RESPONSE:

There are no studies available that capture the information requested.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-18. PLEASE PROVIDE ALL WRITTEN STUDIES CURRENTLY WITHIN PWD’S CUSTODY OR CONTROL, WHETHER OR NOT PREPARED BY OR FOR THE PWD, THAT EXPLICITLY ASSESS THE EXTENT TO WHICH THE FOLLOWING ACTIVITIES REDUCE RESIDENTIAL BAD DEBT:

A. DEFERRED PAYMENT AGREEMENTS;
B. DISCONNECTIONS FOR NONPAYMENT;
C. BUDGET BILLING PLANS;
D. LATE PAYMENT CHARGES.

RESPONSE:

There are no studies available that capture the information requested.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-19. PLEASE PROVIDE ALL WRITTEN STUDIES CURRENTLY WITHIN PWD’S CUSTODY OR CONTROL, WHETHER OR NOT PREPARED BY OR FOR PWD, THAT EXPLICITLY ASSESS THE EXTENT TO WHICH THE FOLLOWING ACTIVITIES REDUCE RESIDENTIAL ARREARS:

A. DEFERRED PAYMENT AGREEMENTS;
B. DISCONNECTIONS FOR NONPAYMENT;
C. BUDGET BILLING PLANS;
D. LATE PAYMENT CHARGES.

RESPONSE:

There are no studies available that capture the information requested.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-20. PLEASE PROVIDE A COPY OF:

A. ALL WRITTEN DOCUMENTS THAT EXPLAIN, ASSESS OR OTHERWISE DISCUSS THE CRITERIA PWD USES TO ASSESS ON AN ONGOING BASIS THE EFFECTIVENESS OF ITS CURRENT CREDIT AND COLLECTION ACTIVITIES.

B. ANY WRITTEN ASSESSMENT, EVALUATION, REPORT OR OTHER WRITTEN DOCUMENT OF ANY NATURE PREPARED SINCE JANUARY 1, 2015 WHICH DISCUSSES THE EFFECTIVENESS OF PWD’S CURRENT CREDIT AND COLLECTION ACTIVITIES.

RESPONSE:

There are no written assessments, evaluations, reports, or other written documents that capture the information requested.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-21. PLEASE PROVIDE A COPY OF ALL REPORTS, EVALUATIONS, MEMOS, ANALYSES OR OTHER WRITTEN DOCUMENTS OF ANY NATURE PREPARED SINCE JANUARY 2015 ESTABLISHING PERFORMANCE INDICATOR TARGETS TO BE MET WITHIN THE NEXT YEAR AFTER PUBLICATION OF THE PERFORMANCE TARGETS; WITHIN THE NEXT TWO YEARS AFTER PUBLICATION OF THE PERFORMANCE TARGETS; OR WITHIN THE NEXT THREE YEARS AFTER PUBLICATION OF THE PERFORMANCE TARGETS, WITH RESPECT TO:

A. DEBT PREVENTION;
B. DEBT MANAGEMENT;
C. THE TREATMENT OF VULNERABLE CUSTOMERS;
D. CUSTOMER SATISFACTION.

RESPONSE:

There are no studies available that capture the information requested.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-22. PLEASE PROVIDE A SINGLE COPY OF ANY REPORT, EVALUATION, STUDY OR OTHER WRITTEN DOCUMENT OF ANY NATURE, WITHIN THE CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED BY OR FOR PWD, DATED WITHIN THE PAST FIVE YEARS, IDENTIFYING, EVALUATING OR OTHERWISE DISCUSSING WHY NONPAYING RESIDENTIAL CUSTOMERS DO NOT MAKE CONTACT WITH THE UTILITY WHEN, IN RESPONSE TO BILL NONPAYMENT, THOSE NONPAYING CUSTOMERS RECEIVE A REQUEST OR NOTICE TO CONTACT A UTILITY TO AVOID THE DISCONNECTION OF SERVICE.

RESPONSE:

There are no reports, evaluations, memos, analyses or other written documents available that capture the information requested.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-23. PLEASE PROVIDE A SINGLE COPY OF ANY REPORT, EVALUATION, STUDY OR OTHER WRITTEN DOCUMENT OF ANY NATURE, WITHIN THE CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED BY OR FOR PWD, DATED WITHIN THE PAST FIVE YEARS, IDENTIFYING, EVALUATING OR OTHERWISE DISCUSSING WHY RESIDENTIAL CUSTOMERS DO NOT SUCCESSFULLY COMPLETE DEFERRED PAYMENT PLANS (SOMETIMES KNOWN AS PAYMENT AGREEMENTS OR OTHER SIMILAR TERMS) IN ORDER TO AVOID THE DISCONNECTION OF SERVICE FOR NONPAYMENT.

RESPONSE:

There are no reports, evaluations, memos, analyses or other written documents available that capture the information requested.

RESPONSE PROVIDED BY:  Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-24. PLEASE PROVIDE A LIST OF EACH FIVE DIGIT ZIP CODE SERVED BY PWD. FOR EACH ZIP CODE, PROVIDE:

A. THE NUMBER OF RESIDENTIAL CUSTOMERS SERVED IN THAT ZIP CODE;

B. THE NUMBER OF TAP CUSTOMERS SERVED IN THAT ZIP CODE

RESPONSE:


RESPONSE PROVIDED BY:  Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-25. 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:

A. BILLINGS;
B. PAYMENTS;
C. ARREARS;
D. DISCONNECTIONS, RECONNECTIONS;
E. PAYMENT PLANS;
F. OTHER CREDIT AND COLLECTION ACTIVITIES.

RESPONSE:

See response attached PA-III-25 AR Aging by Postal Zone Report. Please note there are no reports available that capture the data requested in subsections (A), (B), and (D) through (F).

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PLEASE PROVIDE, BY MONTH SINCE JULY 2017:

A. THE NUMBER OF NEW TAP NEW ENROLLEES.

B. THE TOTAL NUMBER OF TAP PARTICIPANTS.

C. THE NUMBER OF TAP NEW ENROLLEES HAVING PREPROGRAM ARREARS AT THE TIME OF ENROLLMENT.

D. THE AGGREGATE DOLLARS OF PREPROGRAM ARREARS FOR TAP NEW ENROLLEES AT THE TIME OF ENROLLMENT.

E. THE AVERAGE DOLLAR AMOUNT OF PREPROGRAM ARREARS FOR TAP NEW ENROLLEES AT THE TIME OF ENROLLMENT.

F. THE NUMBER OF TAP BILLS ISSUED IN THAT MONTH.

G. THE DOLLARS OF TAP BILLS ISSUED IN THAT MONTH.


I. THE NUMBER OF TAP PAYMENTS IN THAT MONTH.

J. THE DOLLARS OF TAP PAYMENTS IN THAT MONTH.

K. THE NUMBER OF TAP FULL AND ON-TIME PAYMENTS IN THAT MONTH.

L. THE NUMBER OF TAP ACCOUNTS IN ARREARS IN THAT MONTH (EXCLUDING ARREARS THAT ARE SOLELY PREPROGRAM ARREARS).

M. THE DOLLARS OF ARREARS ON TAP ACCOUNTS IN THAT MONTH (EXCLUDING ARREARS THAT ARE SOLELY PREPROGRAM ARREARS).
THE NUMBER OF CUSTOMERS WHO EXITED TAP BY REASON FOR THE EXIT.

RESPONSE:

The report attached as PA-III-26_Response.xls is answer the questions posed by PA-III-26 parts A through D, F through L, and M. Data for parts E and N are unavailable. Data are shown by calendar month as requested, from July 2017 through January 2022. A synopsis of data in each column is provided below.

Synopsis of Columns

(a) New TAP Enrollees
The number of applications approved for a TAP plan through the new application workflow and reporting software Customer Application Management Program (CAMP). This number includes all applications that were approved for TAP, regardless of the application’s current status. If an applicant was approved for a plan in CAMP more than once, the most recent approval was used.

(b) Total TAP Participants
The number of customers that were issued a TAP bill during the calendar month in question. Customers issued more than one TAP bill during a calendar month were counted once. Customers not issued a TAP bill during a calendar month were not counted for the month in question. Note that depending on a customer’s billing cycle, a customer enrolled in one month (counted in (a) above) is included in this number in the month in which receive their first bill, which may not be the same month that customer is enrolled.
(c) Number of TAP New Enrollees Having Preprogram Arrears at the Time of Enrollment

The number of applications approved for a TAP plan as described in part (a) above with arrears, defined as account balance, at the time of approval greater than $0, as recorded from Basis2 at the time of enrollment. Note that this excludes any balances that were in dispute or bankruptcy at the time of approval.

(d) Aggregate Dollars of Preprogram Arrears for TAP New Enrollees at the Time of Enrollment

The total dollar amount of arrears, defined as account balance, as defined in part (c) above. This excludes any balances that were in dispute or bankruptcy at the time of approval.

(f) Number of TAP Bills Issued

The number of TAP bills issued to customers in item (b). Each TAP bill for a customer is counted. If a customer were issued more than one TAP bill during a calendar month, each bill is counted. Bills that have subsequently been reversed are not included.

(g) Dollars of TAP Bills Issued

The total dollar amount of TAP bills counted in item (f).

(h) Dollars of TAP Credits/Discounts

The total dollar amount of TAP discounts associated with TAP bills counted in (f) and (g) is summed in this item.

(i) Number of TAP Payments

During the calendar month, the count of distinct credits (payments) that are allocated to (that is, pay off) debits associated with TAP bills issued at any time. If more than one payment was made against a bill, each is counted.

(j) Dollars of TAP Payments
During the calendar month, the total dollar amount of credits (payments) allocated to (that
is, pay off) debits associated with TAP bills issued at any time.

(k) Number of TAP In-Full and On-Time Payments

The number of payments allocated during the calendar month to debit lines associated
with TAP bills within 30 days of the date the bill was issued which bring the balance of
the bill to $0.

(l) Number of Participants With TAP Balance Aged X-Y days

The number of participants with at least one TAP bill bearing an unpaid balance with an
age within the indicated range. The ranges provided are:

- Number of Participants With TAP Balance Aged 0-30 days
- Number of Participants With TAP Balance Aged 31-60 days
- Number of Participants With TAP Balance Aged 61-90 days
- Number of Participants With TAP Balance Aged 91-120 days
- Number of Participants With TAP Balance Aged 121+ days

An unpaid balance was determined as the total dollar amount of the account’s TAP bills
minus the sum of all payments made against the bills prior to the creation date of the most
recent TAP

bill issued during the month in question. As described under item (i), a payment was
determined as a credit allocated to a debit line associated with a TAP bill. The age of the
unpaid balance was determined as the number of elapsed days between the creation date of
the bill in question and the creation date of the most recent TAP bill issued during the
calendar month in question.

Note that a TAP bill that is issued with a negative total is not counted as bearing a balance
aged 0-30 days. Such bills will be included in the counts and sums in items (f) and (g).

(m) Dollars of TAP Balance Aged X-Y days
The total dollar amount of unpaid balances of TAP bills identified as described in part (I) above. The ranges provided are:

- Dollars of TAP Balance Aged 0-30 days
- Dollars of TAP Balance Aged 31-60 days
- Dollars of TAP Balance Aged 61-90 days
- Dollars of TAP Balance Aged 91-120 days
- Dollars of TAP Balance Aged 121+ days

RESPONSE PROVIDED BY:  Raftelis Financial Consultants, Inc.
PA-III-27. PLEASE PROVIDE BY MONTH SINCE JULY 2017 A DISTRIBUTION, IN BANDS OF $50, OF PREPROGRAM ARREARS ON THE ACCOUNTS OF NEW TAP ENROLLEES.

RESPONSE:

A spreadsheet entitled PA-III-27_Response is included as attachment. This report shows the distribution of pre-program arrears for TAP enrollees at the time of their enrollment per month. Data are shown by calendar month as requested, for July 2017 through December 2019. "Pre-TAP arrears" is defined as the total account balance of a customer at the time of their enrollment in the TAP. Note that this excludes any balances that were in dispute or bankruptcy at the time of approval. The lower limit of an arrears band is inclusive, and the upper limit is exclusive. For instance, applications that are approved with a pre-TAP account balance of $0.00 are counted in the $0.00-$50.00 band, and not in the $-50.00-$0.00 band.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-28. PLEASE PROVIDE, BY MONTH SINCE JULY 2017:

A. THE NUMBER OF NOTICES OF DISCONNECTION FOR
   NONPAYMENT ISSUED TO TAP PARTICIPANTS.

B. THE NUMBER OF TAP PARTICIPANT ACCOUNTS THAT WERE
   DISCONNECTED FOR NONPAYMENT.

C. THE NUMBER OF FINAL BILLS ISSUED TO TAP PARTICIPANT
   ACCOUNTS.

D. THE NUMBER OF FINAL BILLS ISSUED TO TAP PARTICIPANT
   ACCOUNTS THAT HAD AN ARREARAGE ON THAT FINAL BILL.

E. THE AGGREGATE DOLLAR VALUE OF ARREARAGES
   CONTAINED ON FINAL BILLS ISSUED TO TAP PARTICIPANT
   ACCOUNTS.

RESPONSE:

Preparation of this response is in progress and will be provided in the future.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-29. PLEASE PROVIDE A COPY OF ALL CURRENTLY EFFECTIVE:

A. TRAINING MANUALS PROVIDED TO PWD PERSONNEL
   DESCRIBING THE TAP PROGRAM.

B. TRAINING MANUALS PROVIDED TO PWD PERSONNEL
   INVOLVED WITH TAP INTAKE DESCRIBING THE INTAKE
   PROCESS.

C. PROCEDURES MANUALS DESCRIBING THE TAP PROGRAM.

D. PROCEDURES MANUALS DESCRIBING THE TAP INTAKE
   PROCESS.

E. TRAINING MATERIALS PROVIDED TO PWD PERSONNEL
   INVOLVED WITH TAP INTAKE DESCRIBING THE TAP INTAKE
   PROCESS.

F. TRAINING MATERIALS PROVIDED TO PERSONS OTHER THAN
   PWD PERSONNEL WHICH PERSONS ARE OR MIGHT BE
   INVOLVED WITH THE TAP INTAKE PROCESS.

G. OUTREACH MATERIALS PROVIDED TO PWD CUSTOMERS
   DESCRIBING WHO IS QUALIFIED FOR AND/OR HOW TO ENROLL
   IN TAP.

H. OUTREACH MATERIALS PROVIDED TO THE PUBLIC OTHER
   THAN PWD CUSTOMERS DESCRIBING WHO IS QUALIFIED FOR
   AND/OR HOW TO ENROLL IN TAP.
RESPONSE:

Raftelis Financial Consultants, Inc. is providing numerous documents in this response to PA-III-29. All information in documents provided is effective as of their date. This list is current as of December 31, 2019. As the program undergoes changes, processes and documentation are subject to change.

A. Raftelis has continued to provide training to PWD and WRB staff after the initial training provided at the time of program launch on 7/1/17. (Those materials are listed in PA-ADV-90, 2018 [https://www.phila.gov/media/20180216112823/PWDPublicAdvocateADVSet1ResponsesBVRFCWRB.pdf] and provided as attachments to the 2018 Rate Case proceedings [https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-proceedings/2018-proceeding/].) Since July 2017, Raftelis has focused on trainings for the Customer Assistance Division following periodic updates to the Customer Assistance Management Program (CAMP) software and associated policy clarifications. Find training manuals provided for PWD personnel describing the TAP program in section (a) of the attachment Response_Attachment_PA-III-29.pdf. These sections contain the information presented during the Customer Assistance Division “Town Halls.” The group training sessions and their respective dates are listed below.
B. Training materials for PWD personnel describing the application intake process can be found in sections (b) and (d) (specifically, pages 538-550) of Response_Attachment_PA-III-29.pdf. These sections contain information presented during training sessions for the Contact Center as well as documentation of the application request process and details on the online application portal, which are the aspects of the program and associated software
that are most used by the Contact Center staff. The group training sessions and their respective dates are listed below.

<table>
<thead>
<tr>
<th>Date</th>
<th>Group</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>12/12/2018</td>
<td>Contact Center</td>
<td>372 – 383</td>
</tr>
<tr>
<td>1/16/2019</td>
<td>Contact Center</td>
<td>384 – 391</td>
</tr>
<tr>
<td>3/27/2019</td>
<td>Contact Center</td>
<td>392 – 402</td>
</tr>
<tr>
<td>4/30/2019</td>
<td>Contact Center</td>
<td>403 – 417</td>
</tr>
<tr>
<td>6/25/2019</td>
<td>Contact Center</td>
<td>418 – 433</td>
</tr>
<tr>
<td>8/20/2019</td>
<td>Contact Center</td>
<td>434 – 452</td>
</tr>
<tr>
<td>10/16/2019</td>
<td>Contact Center</td>
<td>453 – 466</td>
</tr>
<tr>
<td>12/10/2019</td>
<td>Contact Center</td>
<td>467 – 481</td>
</tr>
</tbody>
</table>

C. Section (c) of Response_Attachment_PA-III-29.pdf contains the Standard Operating Procedures document, which describes the TAP program and provides documentation about various aspects of the program in terms of reviewing applications, operating the CAMP software, and making decisions for CAP applications. Section (d) contains Quick Reference Guides that were produced to be easily referenced via CAMP software: they are available as PDFs that are displayed in the Help section of the software. They are updated with each software update.
<table>
<thead>
<tr>
<th>Date</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/1/2019</td>
<td>Quick Reference Guide: Basis2 Calls Related to TAP</td>
<td>534 – 537</td>
</tr>
<tr>
<td>10/1/2019</td>
<td>Quick Reference Guide: Denying Applications</td>
<td>589 – 593</td>
</tr>
<tr>
<td></td>
<td>Managers</td>
<td></td>
</tr>
</tbody>
</table>
D. The manual describing the application intake process can be found in sections (d) and (e) of Response_Attachment_PA-III-29.pdf. Section (c) contains the Standard Operating Procedures document, which provides documentation about various aspects of the program in terms of completing applications, reviewing applications, operating the CAMP software, and making decisions for CAP applications. Section (d) contains Quick Reference Guides that were produced to be easily referenced via the CAMP software: they are available through the software. They are updated with each software update.

<table>
<thead>
<tr>
<th>Date</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>10/1/2019</td>
<td>Quick Reference Guide: Basis2 Calls Related to TAP</td>
<td>534 – 537</td>
</tr>
</tbody>
</table>
10/1/2019 | Quick Reference Guide: Denying Applications | 589 – 593
Feb 2018 | Quick Reference Guide: Explain a TAP Bill | 650 - 657

E. Original training materials provided to PWD personnel involved with TAP intake
describing the TAP intake process can be found in sections (a), (b), (l), (o), and (r) of the
PA-ADV-90_Attachment document for 2018 Rate Case
[https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-proceedings/2018-proceeding/]. These sections contain the training materials presented
during several training sessions at the launch of the program in 2017. Since then,
Customer Assistance Division and Contact Center staff have received periodic trainings,
as described in answers A and B above, to convey necessary information on program
policies and software functionalities. A training manual for onboarding new staff at the
Contact Center and Customer Assistance Division was periodically updated through 2018.
It can be found in section (c) of Response_Attachment_PA-III-29.pdf. Starting in 2019,
Quick Reference Guides double as training and reference materials for any new staff
joining these teams. The currently available Quick Reference Guides can be found in
section (d) of Response_Attachment_PA-III-29.pdf.
<table>
<thead>
<tr>
<th>Date</th>
<th>Title</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>8/10/2018</td>
<td>WRB Training Manual v6</td>
<td>482 – 525</td>
</tr>
<tr>
<td>10/1/2019</td>
<td>Quick Reference Guide: Basis2 Calls Related to TAP</td>
<td>534 – 537</td>
</tr>
<tr>
<td>10/1/2019</td>
<td>Quick Reference Guide: Denying Applications</td>
<td>589 – 593</td>
</tr>
</tbody>
</table>
F. Original training materials provided to persons other than PWD personnel at the time of program launch can be found in section (q) of the PA-ADV-90_ATTACHMENT document for 2018 Rate Case [https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-proceedings/2018-proceeding/]. This section contains the training materials presented during several training sessions for the Department’s partner organizations.

G. Original outreach materials provided to PWD customers at the time of program launch describing who is qualified for and/or how to enroll in TAP can be found in section (s) of the PA-ADV-90_Attachment document for 2018 Rate Case [https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-proceedings/2018-proceeding/]. This section contains examples of various types of publications generated for and sent to PWD customers. These examples explain general details of the program and provide information on how to apply for assistance.

Outreach materials that have been produced since 2018 include an updated customer assistance application. The updates were based on feedback from Residential Customer Assistance and Services (RCAS) stakeholder group as well as observational studies of customers’ experience with the earlier version of the application conducted by PWD Public Affairs. The updated application (v5.0) can be found in section (f) of Response_Attachment_PA-III-29.pdf.
The PWD Public Affairs created outreach materials for the Senior Citizen Discount recipient campaign, which focused on current recipients of the Senior Citizen Discount (SCD) who had not applied for TAP as of spring 2019. PWD Public Affairs created bill stuffers to inform customers about TAP at the end of moratorium periods in 2018 and 2019. SCD campaign materials and bill stuffers are included in section (g) of Response_Attachment_PA-III-29.pdf.

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>5/1/2019</td>
<td>Updated application (version 5.0)</td>
<td>869 – 876</td>
</tr>
<tr>
<td>May 2019</td>
<td>Senior Citizen Discount participant campaign direct-mail cover letter</td>
<td>877</td>
</tr>
<tr>
<td>11/25/2019</td>
<td>Senior Citizen Discount participant campaign mailer</td>
<td>878</td>
</tr>
<tr>
<td>10/2019</td>
<td>Social Media: Utility Fair</td>
<td>879</td>
</tr>
<tr>
<td>10/2019</td>
<td>Robo Phonecall: Utility Fair Cobbs Creek</td>
<td>n/a</td>
</tr>
</tbody>
</table>

H. Original outreach materials provided to the public other than PWD customers describing who is qualified for and/or how to enroll in TAP can be found in section t of the PA-ADV-90_Attachment document for 2018 Rate Case [https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-proceedings/2018-proceeding/]. This section contains images of advertising placed at subway stations, bus stops, on bus exteriors, as well as the interior of subways.
Additionally, the Department has performed outreach to inform Philadelphia residents about TAP, including at community presentations and Utility Fairs. Outreach materials for various events are included in section (h) of Response_Attachment_PA-III-29.pdf. The list of outreach events that have been conducted through 12/31/19 are also included in that section.

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>11/2018 - present</td>
<td>Presentation Slides: How to enroll</td>
<td>884 – 887</td>
</tr>
<tr>
<td>10/2018- present</td>
<td>Presentation Slide: general</td>
<td>888</td>
</tr>
<tr>
<td>9/2017-present</td>
<td>Tabling Flyer: New Ways to get help with your water bill</td>
<td>889</td>
</tr>
<tr>
<td>1/2018-present</td>
<td>Tear-away Tabling Flyer: Get help with your water bill (English and Spanish)</td>
<td>890 – 891</td>
</tr>
<tr>
<td>3/2019-present</td>
<td>Fact Sheet: Tenant to TAP</td>
<td>892</td>
</tr>
<tr>
<td>6/2019-present</td>
<td>Pamphlet: Block Captain Guide</td>
<td>893</td>
</tr>
<tr>
<td>10/2019</td>
<td>Outdoor Signage: Utility Fair Cobbs Creek</td>
<td>894</td>
</tr>
<tr>
<td>11/2019</td>
<td>Outdoor Signage: Utility Fair West Philly</td>
<td>895</td>
</tr>
<tr>
<td>6/15/2017 – 12/31/2019</td>
<td>List of Customer Assistance Programs and Tiered Assistance Program outreach events</td>
<td>897 – 899</td>
</tr>
</tbody>
</table>

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-30. PLEASE PROVIDE COPIES OF ALL INTERNAL DATA REPORTS
ROUTINELY PERIODICALLY (E.G., WEEKLY, MONTHLY, BI-MONTHLY)
GENERATED REGARDING THE OPERATION OF TAP SINCE JULY 1, 2017.

RESPONSE:

Daily, weekly, and quarterly reports are provided as PA-III-30_Response.xls.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-31. PLEASE PROVIDE BY MONTH SINCE JANUARY 2017:

A. THE NUMBER OF BUDGETED PWD STAFF POSITIONS DEVOTED EXCLUSIVELY TO THE OPERATION OF TAP.

B. THE NUMBER OF ACTUAL PWD STAFF POSITIONS DEVOTED EXCLUSIVELY TO THE OPERATION OF TAP.

C. THE NUMBER OF BUDGETED PWD STAFF POSITIONS WHOSE TIME IS DEVOTED PARTIALLY TO THE OPERATION OF TAP, INCLUDING AN IDENTIFICATION OF THE PORTION OF TIME DEVOTED TO TAP.

D. THE NUMBER OF ACTUAL PWD STAFF POSITIONS WHOSE TIME IS DEVOTED PARTIALLY TO THE OPERATION OF TAP, INCLUDING AN IDENTIFICATION OF THE PORTION OF TIME DEVOTED TO TAP.

RESPONSE:

See attached response PA-III-31 Staff Report.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller and RaVonne Muhammed, Water Revenue Bureau
PA-III-32. PLEASE PROVIDE A COPY OF ALL THIRD PARTY CONTRACTS WITH
AN ENTITY OUTSIDE PWD:

A. REGARDING INFORMATION TECHNOLOGY DEVOTED
   EXCLUSIVELY TO TAP.

B. REGARDING OUTREACH DEVOTED EXCLUSIVELY TO TAP.

C. REGARDING INTAKE DEVOTED EXCLUSIVELY TO TAP.

RESPONSE:

PWD has issued a notice of intent to contract with Energy Coordinating Agency of
Philadelphia, Inc. for administration and implementation assistance for the Tiered
Assistance Program. The notice is posted on the City’s eContract website, which is
available at: https://secure.phila.gov/eContract/. The contract is currently being
negotiated.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-III-33. PLEASE PROVIDE THE AVERAGE NUMBER OF RESIDENTIAL
DISCONNECTIONS FOR NONPAYMENT PER DAY PER INDIVIDUAL
FIELD PERSONNEL DOING DISCONNECTIONS FOR NONPAYMENT. IF
SUCH AVERAGE DIFFERS BY MONTH OR BY SEASON OF THE YEAR,
SEPARATELY PROVIDE THE DIFFERENT NUMBERS ALONG WITH AN
IDENTIFICATION OF WHICH MONTH OR SEASON THE NUMBER
RELATES TO.

RESPONSE:

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

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau and Donna
Schwartz, Philadelphia Water Department
PA-III-34. PLEASE PROVIDE THE AVERAGE NUMBER OF RESIDENTIAL DISCONNECTIONS FOR NONPAYMENT THAT OCCUR ON EACH DAY OF THE WEEK. IN THE ALTERNATIVE, PLEASE PROVIDE THE PERCENTAGE OF TOTAL WEEKLY DISCONNECTIONS THAT OCCUR ON EACH DAY OF THE WEEK.

RESPONSE:

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

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau and Donna Schwartz, Philadelphia Water Department
PA-III-35.  PLEASE PROVIDE THE AVERAGE TIME (IN MINUTES OR IN
INCREMENTS OF AN HOUR) THAT IT TAKES A STAFFPERSON TO
PERFORM A RESIDENTIAL DISCONNECTION OF SERVICE FOR
NONPAYMENT.

RESPONSE:

The normal shut-off time at a property is approximately 10 minutes when the Field
Service Representative (FSR) is at a property. This estimate excludes travel and
administrative time. Also, if the curb box is obstructed or not visible upon initial
inspection the FSR is required to spend up to 30 minutes to locate and or clear an
obstruction.

RESPONSE PROVIDED BY:  Donna Schwartz, Philadelphia Water Department
PA-III-36. FOR A TYPICAL FIELD STAFFPERSON THAT PERFORMS RESIDENTIAL DISCONNECTIONS FOR NONPAYMENT, PLEASE PROVIDE:

A. THE PERCENT OF A TYPICAL DAY SPENT ON PERFORMING DISCONNECTIONS FOR NONPAYMENT;

B. THE PERCENT OF A TYPICAL WEEK SPENT ON PERFORMING DISCONNECTIONS FOR NONPAYMENT;

C. THE PERCENT OF A TYPICAL MONTH SPENT ON PERFORMING DISCONNECTIONS FOR NONPAYMENT.

IF THIS DATA DIFFERS BY MONTH OR SEASON, INDICATE THE DIFFERENCES AND THEN IDENTIFY THE MONTH OR SEASON TO WHICH THE DIFFERENCE APPLY.

RESPONSE:

The budgeted positions in Delinquency & Restorations spend 100% of their time addressing delinquent shut offs during the shut off season. This includes:

(i) Shut offs for delinquency,

(ii) Restores for delinquency after the customer makes payment arrangements,

(iii) Issuing curb stop violations, and

(iv) Correcting curb stop violations in order to shut off service to the property.

The percent of a typical week or month spent on performing disconnections for nonpayment during shut off season is the same as daily.

Please note that the data differs between shut off season and the moratorium. Moratorium runs from December 1st of each year until April 1st of the following year. During the
moratorium we only shut off commercial accounts and correct plumbing violations to
residential accounts in anticipation of shutting off service once the moratorium is lifted.

RESPONSE PROVIDED BY:  Donna Schwartz, Philadelphia Water Department
PA-III-37. PLEASE PROVIDE A DETAILED EXPLANATION OF THE RATEMAKING TREATMENT OF LATE FEE REVENUE. SEPARATELY EXPLAIN HOW LATE FEE REVENUE IS APPORTIONED BETWEEN CUSTOMER CLASSES;

RESPONSE:

Late fee revenues are net from the system operating expenses (see Line 10 of Tables W-10 and WW-10, PWD Statement 7A, Schedule BV-1).

The Department does not have customer classes. Additionally, the General Bond Ordinance defines “System” as the entire combined water system and wastewater system of the City (PWD Statement No. 2, Schedule ML-3, Bond Counsel Memorandum). As such, the Department’s late fee revenues are reported in total.

RESPONSE PROVIDED BY: Melissa La Buda, Philadelphia Water Department and Black & Veatch Management Consulting, LLC.
PA-III-38. FOR EACH OF THE THREE MOST RECENTLY COMPLETED FISCAL YEARS, AS WELL AS FOR THE CURRENT FISCAL YEAR TO DATE, PLEASE PROVIDE A COPY OF ALL BUDGET DOCUMENTS SPECIFICALLY IDENTIFYING COLLECTION ACTIVITIES AS A SEPARATELY STATED LINE-ITEM.

A. FOR THE CURRENT FISCAL YEAR, PROVIDE THOSE BUDGET DOCUMENTS INDICATING THE BUDGETED EXPENDITURES YEAR-TO-DATE;

B. FOR THE THREE MOST RECENTLY COMPLETED FISCAL YEARS, PROVIDE A COPY OF ALL BUDGET DOCUMENTS REPORTING ACTUAL EXPENDITURES FOR THE BUDGET YEAR;

C. FOR THE CURRENT FISCAL YEAR, PROVIDE THOSE BUDGET DOCUMENTS INDICATING ACTUAL EXPENDITURES FOR THE BUDGET YEAR;

D. IF AVAILABLE, FOR DOCUMENT SHOWING ACTUAL EXPENDITURES, PROVIDE DOCUMENTS THAT SHOW SIDE-BY-SIDE COMPARISONS OF BUDGETED EXPENDITURES VS. ACTUAL EXPENDITURES.

RESPONSE:

Please see response attachment PA-III-38.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-39. STATE THE TOTAL BUDGETED COLLECTION COSTS FOR EACH FISCAL YEAR 2018 TO CURRENT INCLUSIVE, SEPARATED BY RESIDENTIAL AND NON-RESIDENTIAL ACCOUNTS, ASSOCIATED WITH HANDLING DELINQUENT ACCOUNTS, EXCLUDING ADMINISTRATIVE AND OVERHEAD EXPENSES.

RESPONSE:

We do not base our collection efforts on residential vs non-residential categories and therefore cannot provide the requested information.

RESPONSE PROVIDED BY: Melissa La Buda, Philadelphia Water Department and Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-40. STATE THE TOTAL ACTUAL COLLECTION COSTS FOR EACH FISCAL
YEAR 2018 TO CURRENT INCLUSIVE, SEPARATED BY RESIDENTIAL
AND NON-RESIDENTIAL ACCOUNTS, ASSOCIATED WITH HANDLING
DELINQUENT ACCOUNTS, EXCLUDING ADMINISTRATIVE AND
OVERHEAD EXPENSES.

RESPONSE:

We do not base our collection efforts on residential vs non-residential categories and
therefore cannot provide the requested information.

RESPONSE PROVIDED BY: Melissa La Buda, Philadelphia Water Department and Michelle
L. Bethel-Miller, Water Revenue Bureau
PA-III-41. PLEASE PROVIDE AN EXPLANATION AND A DETAILED DESCRIPTION OF HOW RESIDENTIAL LATE FEES ARE ALLOCATED IN THE PWD COST-OF-SERVICE STUDY.

RESPONSE:

Please response to PA-III-37.

RESPONSE PROVIDED BY: Black & Veatch Management Consulting, LLC
PA-III-42. PLEASE IDENTIFY FOR EACH MONTH, FROM THE BEGINNING OF
FISCAL YEAR 2018 TO THE PRESENT, THE NUMBER OF BUDGETED JOB
POSITIONS WHOSE JOB DESCRIPTION WOULD OR MAY INCLUDE THE
TASK OF DISCONNECTING RESIDENTIAL SERVICE FOR NONPAYMENT.
IF A COUNT OF BUDGETED JOB POSITIONS IS AVAILABLE ON SOME
PERIODIC BASIS OTHER THAN BY MONTH, IDENTIFY THE COUNT BY
THE MOST FREQUENT PERIOD AVAILABLE (E.G., PROVIDE ANNUAL
DATA, BUT ONLY IF A COUNT ON SOMETHING MORE FREQUENT
THAN ANNUALLY IS NOT AVAILABLE).

RESPONSE:
Budgeted positions are constant throughout the year. Currently there are 42 Budgeted
positions who work on residential shut offs, 29 Field Service Representatives who perform
shut offs and 13 support positions between managers, supervisors and clerical staff.

RESPONSE PROVIDED BY: Donna Schwartz, Philadelphia Water Department
PA-III-43. PLEASE PROVIDE ANY DOCUMENTS, ANALYSES OR REPORTS WHICH
COULD BE USED TO DETERMINE THE FIELD STAFF CAPACITY (I.E.,
FULL-TIME EQUIVALENTS) NEEDED TO PERFORM ALL THE
RESIDENTIAL SERVICE DISCONNECTIONS FOR NONPAYMENT
SCHEDULED:

A. BY WEEK;
B. BY MONTH; AND
C. BY YEAR.

RESPONSE:
There are no documents, analyses, or reports available that capture the information
requested.

RESPONSE PROVIDED BY: Donna Schwartz, Philadelphia Water Department
PHILADELPHIA WATER DEPARTMENT
Response to PA Interrogatory

PA-III-44. PLEASE IDENTIFY ANY DOCUMENTS, ANALYSES OR REPORTS THAT
ADDRESS, CONCERN OR REFERS TO THE SCHEDULING OR
APPOINTING OF STAFF TO PERFORM RESIDENTIAL SERVICE
DISCONNECTIONS FOR NONPAYMENT DURING THE PEAK MONTHS OF
RESIDENTIAL SHUTOFFS.

RESPONSE:
There are no documents, analyses, or reports available that capture the information
requested. Additionally, the term “peak” is vague and undefined in the discovery request.

RESPONSE PROVIDED BY: Donna Schwartz, Philadelphia Water Department
PA-III-45. PLEASE IDENTIFY ANY DOCUMENTS, ANALYSES OR REPORTS
PREPARED, MODIFIED OR USED SINCE JANUARY 2018, THAT
ADDRESSES, CONCERNS OR REFERS TO:

A. CHANGES IN COLLECTION PROCEDURES DURING THE MONTHS
   OF PEAK SERVICE DISCONNECTIONS;

B. CHANGES IN THE DECISION RULE ON WHETHER AND/OR WHEN
   TO PERFORM CERTAIN COLLECTION ACTIVITIES DURING THE
   MONTHS OF PEAK SERVICE DISCONNECTIONS;

C. CHANGES IN COLLECTION PRACTICES OR PROCEDURES OF
   ANY SORT THAT ARE ADOPTED DURING THE MONTHS OF PEAK
   SERVICE DISCONNECTION.

D. CHANGES IN STAFFING LEVELS OR STAFFING SCHEDULING
   DURING THE MONTHS OF PEAK SERVICE DISCONNECTIONS.

RESPONSE:

There are no documents, analyses, or reports available that capture the information
requested. Additionally, the term “peak” is vague and undefined in the discovery request.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-46. PLEASE PROVIDE A COPY OF ANY AND ALL LABOR AGREEMENTS
AFFECTING PWD THAT INCLUDE ANY REFERENCE TO THE
DISCONNECTION OF SERVICE FOR NONPAYMENT.

RESPONSE:

The Collective Bargaining Agreements and subsequent amendments do not reference the
issue of service disconnects.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-III-47. PLEASE PROVIDE FOR EACH MONTH FROM THE BEGINNING OF FISCAL YEAR 2018 TO PRESENT:

A. THE DETAILED MONTHLY BUDGETS FOR EACH DEPARTMENT, OFFICE, WORKGROUP OR OTHER FUNCTIONING UNIT OF PWD, BY WHATEVER NAME, PREPARING A DETAILED BUDGET, INVOLVED WITH RESIDENTIAL COLLECTIONS; AND

B. THE DETAILED MONTHLY FINANCIAL REPORTS SUBMITTED TO PWD FISCAL PERSONNEL, BY (OR PREPARED FOR) EACH DEPARTMENT, OFFICE, WORKGROUP OR OTHER FUNCTIONING UNITS OF PWD, BY WHATEVER NAME, INVOLVED WITH RESIDENTIAL COLLECTIONS.

IF MONTHLY BUDGETS AND/OR FINANCIAL REPORTS ARE NOT AVAILABLE, PROVIDE WHAT IS AVAILABLE (E.G., ANNUAL, QUARTERLY) USING THE MOST COMMONLY-GENERATED REPORT (E.G., MONTHLY OVER QUARTERLY, QUARTERLY OVER ANNUAL, ETC.).

RESPONSE:

The Home Rule Charter makes collections a function of the Water Revenue Bureau.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-III-48. PLEASE EXPLAIN AND DESCRIBE IN DETAIL THE JOB DESCRIPTION FOR EACH EMPLOYEE WHOSE REASONABLY EXPECTED TYPICAL DUTIES WOULD INCLUDE THE PROCESS OF DISCONNECTING SERVICE FOR NONPAYMENT. PLEASE INCLUDE ANY DOCUMENTS, ANALYSES OR REPORTS THAT ADDRESS, CONCERN OR REFER TO THE JOB DESCRIPTION.

RESPONSE:

Conducts the enforcement of delinquent water bills and the shut-off of delinquent accounts and illegally restored services; determines if water customer has satisfied the requirements to avoid suspension of service; evaluates medical hardships on site and determines if suspension can be avoided; suspends water service if payment is not received. Conducts inspections to verify water service and ensures that the shut-off valve can be safely operated; restores service for satisfied water balances.

RESPONSE PROVIDED BY: Donna Schwartz, Philadelphia Water Department
PA-III-49. PLEASE PROVIDE BY MONTH SINCE JULY 2017 TO THE PRESENT THE NUMBER OF:

A. RESIDENTIAL DISCONNECTIONS FOR NONPAYMENT.

B. THE NUMBER OF ACCOUNTS RECONNECTED SUBSEQUENT TO A DISCONNECTION FOR NONPAYMENT.

C. THE AVERAGE TIME BETWEEN DISCONNECTION AND RECONNECTION.

RESPONSE:

See response attachment PA-III-49 Disconnection and Reconnection Report. Please note there are no reports available that capture data for “(C) the average time between disconnection and reconnection.”

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-50. BY MONTH SINCE JULY 2017 TO THE PRESENT, OF THE RESIDENTIAL ACCOUNTS RECEIVING A NOTICE OF AN IMPENDING DISCONNECTION FOR NONPAYMENT, PLEASE PROVIDE:

A. THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR SERVICE DISCONNECTED BY THE DATE SPECIFIED IN THE DISCONNECT NOTICE;

B. THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR SERVICE DISCONNECTED FOR NONPAYMENT AFTER RECEIVING A DISCONNECT NOTICE FOR NONPAYMENT THAT VOLUNTARILY TERMINATED THEIR ACCOUNTS;

C. THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR SERVICE DISCONNECTED BECAUSE THE CUSTOMER PAID THEIR BILLS IN FULL PRIOR TO THEIR SCHEDULED DISCONNECTION;

D. THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR SERVICE DISCONNECTED BECAUSE THE CUSTOMER PAID THEIR BILLS LESS THAN IN FULL BUT SUFFICIENT TO AVOID THEIR SCHEDULED DISCONNECTION;

E. THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR SERVICE DISCONNECTED EVEN THOUGH THEY RETAINED AN ARREARS THAT WAS SUFFICIENT LARGE (OR SUFFICIENTLY OLD) TO TRIGGER A DISCONNECTION); AND

F. THE TOTAL NUMBER OF ACCOUNTS ON WHICH ACCOUNT NO PAYMENTS WERE MADE PRIOR TO THE ISSUANCE OF THE NEXT BILL AFTER ISSUANCE OF THE DISCONNECT NOTICE.
RESPONSE:

See response to PA-III-9.

RESPONSE PROVIDED BY:  Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-51. PLEASE PROVIDE BY MONTH FOR EACH MONTH JULY 2017 TO PRESENT, A DISTRIBUTION OF THE NUMBER OF RESIDENTIAL ACCOUNTS IN ARREARS BY THE SIZE OF ARREARS BY THE FOLLOWING BANDS: (1) $0; (2) $1 - $100; (3) $101 - $200; (4) $201 - $300; (5) $301 - $500; (6) $501 - $750; (7) $751 - $1,000; (8) $1,001 - $2,000; AND (9) $2,001 AND ABOVE. IF THESE BANDS ARE NOT AVAILABLE, PLEASE PROVIDE THE NUMBERS OF ACCOUNTS BY WHICH BANDS ARE AVAILABLE.

RESPONSE:

Preparation of this response is in progress and will be provided in the future.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-52. SEPARATELY PROVIDE THIS SAME DATA REQUESTED IN PA-III-51 FOR TAP PARTICIPANTS (EXCLUDING PREPROGRAM ARREARS).

RESPONSE:

Preparation of this response is in progress and will be provided in the future.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-53. **PLEASE PROVIDE ALL WRITTEN STUDIES CURRENTLY WITHIN THE CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED BY OR FOR PWD, THAT EXPLICITLY ASSESS THE RELATIONSHIP BETWEEN THE NUMBER OF, OR RATE AT WHICH, THE PWD ISSUES DISCONNECT NOTICES AND THE REDUCTION OF RESIDENTIAL BAD DEBT.**

**RESPONSE:**

There are no documents, analyses, or reports available that capture the information requested.

**RESPONSE PROVIDED BY:** Melissa LaBuda, Philadelphia Water Department
PA-III-54. PLEASE PROVIDE ALL WRITTEN STUDIES CURRENTLY WITHIN THE
CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED BY OR
FOR PWD, THAT EXPLICITLY ASSESS THE RELATIONSHIP BETWEEN
THE NUMBER OF, OR RATE AT WHICH, PWD ISSUES DISCONNECT
NOTICES AND THE REDUCTION OF RESIDENTIAL ARREARS.

RESPONSE:

There are no documents, analyses, or reports available that capture the information
requested.

RESPONSE PROVIDED BY: Melissa LaBuda, Philadelphia Water Department
PA-III-55. PLEASE PROVIDE A COPY OF ALL REPORTS, EVALUATIONS, MEMOS, ANALYSES OR OTHER WRITTEN DOCUMENTS OF ANY NATURE CONTAINING THE PWD METHODOLOGY, PROCEDURE OR PROCESS DESIGNED TO SYSTEMATICALLY REVIEW, STUDY OR ASSESS THE PWD RESIDENTIAL BILLING AND/OR PAYMENT RECORDS IN AN EFFORT TO:

A. CHARACTERIZE PATTERNS OF NONPAYMENT;
B. IDENTIFY THE CHARACTERISTICS OF NONPAYERS;
C. IDENTIFY PREDICTORS OF NONPAYMENT;
D. IDENTIFY STRATEGIES TO REDUCE NONPAYMENT;
E. IDENTIFY EARLY INDICATORS OF NONPAYMENT.

RESPONSE:

Raftelis has produced two reports that related to section (a) of this question. The FY 2019 Payment Patterns Report, originally provided in Raftelis’ direct testimony as Schedule RFC-6 and provided again as PA-III-3_Response_AB.xls, and the FY 2019 Low Income Billing & Payments Report, originally provided in Raftelis’ direct testimony as Schedule RFC-9, and provided again as PA-III-3_Response_C.xls.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-56. PLEASE PROVIDE EACH CUSTOMER DEMOGRAPHIC SURVEY THAT
HAS BEEN PREPARED FOR RESIDENTIAL CUSTOMERS SINCE
JANUARY 2015. IF NO SURVEY HAS BEEN PREPARED SINCE JANUARY
2015, PLEASE PROVIDE THE MOST RECENT SURVEY.

RESPONSE:
Please see response attachment PA-III-56.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-III-57. BY MONTH FOR THE MONTHS JULY 2017 TO PRESENT, PLEASE PROVIDE FOR RESIDENTIAL CUSTOMERS:

A. THE NUMBER OF CUSTOMERS;
B. THE NUMBER OF BILLS RENDERED;
C. THE DOLLARS BILLED FOR CURRENT SERVICE;
D. THE NUMBER OF PAYMENTS RECEIVED;
E. THE DOLLARS OF PAYMENT RECEIVED.

86. Provide that same data requested in PA-III-57 for TAP participants.

87. Please identify any clusters of English as a Second Language (“ESL”) customers that exist in the PWD service territory by community, zip code, Census Tract, or other geographic region or area by which ESL is tracked. Separately provide a detailed explanation of how clusters of ESL customers are identified.

RESPONSE:
Preparation of the response to items A-E listed above is in progress and will be provided in the future.

Please see responses to PA-III-105 and PA-III-106 for responses to Items # 86 and 87, respectively, referenced in the data request.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-58. PLEASE PROVIDE A DETAILED DESCRIPTION OF:

A. THE TRANSLATION SERVICES AVAILABLE WHEN A PERSON CONTACTS PWD THROUGH AN AUTOMATED OR INTERACTIVE TELEPHONE SYSTEM.

B. THE TRANSLATION SERVICES AVAILABLE WHEN A PERSON CONTACTS PWD THROUGH A HUMAN INTERACTION.

C. THE TRANSLATION SERVICES AVAILABLE WHEN A PERSON CONTACTS PWD THROUGH A WEB-BASED SYSTEM.

D. HOW A PERSON ACCESSES THE TRANSLATION SERVICE WHEN A PERSON CONTACTS PWD THROUGH AN AUTOMATED OR INTERACTIVE TELEPHONE SYSTEM.

E. HOW A PERSON ACCESSES THE TRANSLATION SERVICE WHEN A PERSON CONTACTS PWD THROUGH A HUMAN INTERACTION.

F. HOW A PERSON ACCESSES THE TRANSLATIONS SERVICE WHEN A PERSON CONTACTS PWD THROUGH A WEB-BASED SYSTEM.

RESPONSE:

Please see response attachment PA-III-58.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-III-59. PLEASE PROVIDE A DETAILED DESCRIPTION OF HOW TRANSLATIONS OF WRITTEN DOCUMENTS PROVIDED TO CUSTOMERS ARE PROVIDED FOR:

A. CREDIT AND COLLECTION ACTIVITIES (INCLUDING BUT NOT LIMITED TO SHUTOFF NOTICES).
B. TAP OUTREACH.
C. DEFERRED PAYMENT PLANS.

INCLUDED WITHIN THESE EXPLANATIONS, PROVIDE A DETAILED EXPLANATION OF THE LANGUAGES PROVIDED, HOW THE CHOICE OF LANGUAGES IS MADE, AND HOW THE WRITTEN DOCUMENTS IN DIFFERENT LANGUAGES ARE DISTRIBUTED.

RESPONSE:

Please see response attachment PA-III-59.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau and Raftelis Financial Consultants, Inc.
PA-III-60. 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).

RESPONSE:

The Customer Assistance Management Program (CAMP) began tracking OOPA
approvals in an automated fashion, as described in the response to PA-ADV-65, in April
of 2018. The table below shows the number of TAP enrollees each month, beginning in
April 2018, for whom approved OOPA income information was accepted, as required by
Philadelphia Code §19-1605(3)(I)(.2) (Requiring Acceptance of Determinations of Income
and Residency).

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**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
PA-III-61. 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).

RESPONSE:

The Customer Assistance Management Program (CAMP) began tracking OOPA
approvals in an automated fashion, as described in the response to PA-ADV-65, in April
of 2018. The table below shows the number of TAP enrollees each month, beginning in
April 2018, for whom approved OOPA residency information was accepted, as required
by Philadelphia Code §19-1605(3)(I)(.2) (Requiring Acceptance of Determinations of
Income and Residency).

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RESPONSE PROVIDED BY:  Raftelis Financial Consultants, Inc.

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</table>
PA-III-62. PLEASE IDENTIFY AND PROVIDE A DETAILED DESCRIPTION OF THE MUNICIPAL OFFICE THAT DETERMINES INCOME-ELIGIBILITY FOR THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM.

RESPONSE:

There is no “Philadelphia Tax Hardship Assistance Program,” however, for the purposes of this response, please refer to programs administered pursuant to Section 19-1305 of The Philadelphia Code.

The Department of Revenue’s Tax Credit and Assistance Programs Unit processes applications for low-income taxpayer installment payment agreements.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller and RaVonne Muhammad, Water Revenue Bureau
PA-III-63. 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 A POTENTIAL
COLLABORATION BETWEEN THE TAP AND TAX HARDSHIP
ASSISTANCE PROGRAM WITH RESPECT TO DETERMINING INCOME
ELIGIBILITY FOR THE TWO PROGRAMS.

RESPONSE:

See response to PA-III-62. There is no written correspondence available that captures the
information requested.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller and RaVonne Muhammad, Water
Revenue Bureau
PA-III-64. PLEASE COMPARE AND CONTRAST THE INCOME-ELIGIBILITY FOR
THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM AND TAP.

RESPONSE:

See response to PA-III-62.


RESPONSE PROVIDED BY:  Michelle L. Bethel-Miller and RaVonne Muhammad, Water Revenue Bureau
PA-III-65. PLEASE PROVIDE A DETAILED DESCRIPTION OF ANY PROCESS, 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

RESPONSE:

WRB relies on data provided by the Department of Revenue to cross-reference customer
assistance applicants with existing participants in the Owner-occupied Real Estate Tax
Payment Agreement (OOPA) program. All applicants for the City’s water customer
assistance programs, regardless of their previous participation in WRAP, are cross-
referenced with OOPA participation.

The Customer Assistance Management Program (CAMP), the application workflow and
reporting software, receives daily updates of current OOPA approvals. The Customer
Assistance Division staff use OOPA determinations of income and residency to complete
the review of the customer assistance application, if customers have been approved for
OOPA during the 12 months preceding receipt of their application.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-66. 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).

RESPONSE:

Option (3), some other date. As described in the response to PA-III-26, customers are enrolled in TAP when they are approved for TAP through the application workflow and reporting software, Customer Application Management Program (CAMP). Following approval, the customer’s next bill reflects the customer’s TAP enrollment. Since that bill could occur at any time following approval, as described in the response to PA-III-26, participants are reported as the number of customers that were issued a TAP bill during the calendar month in question.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-67. 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.

RESPONSE:

As described in the response to PA-III-26, applicants are enrolled in TAP when they are found to be eligible.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-68. 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.

RESPONSE:

Applicants will continue to receive their regular monthly bills until they are enrolled in
TAP. If those bills remain unpaid at the time the applicant is enrolled in TAP, those
arrears will be treated like other pre-TAP arrears. In 2019, the average time between when
the application was received by WRB and the time it was approved was less than 8 days.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-69. BY WEEK, SINCE JULY 1, 2017, PROVIDE THE NUMBER OF TAP ENROLLEES BY HOMEOWNER/TENANT STATUS.

RESPONSE:

The number of TAP enrollees by homeowner/tenant status, by week, is provided in PA-III-69_Attachment.xls.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-70. 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, AS WELL AS WITHIN THE ACCOMPANYING WHITE PAPER, THE SPECIFIC LOCATION AT WHICH THE RECONCILIATION OF ADMINISTRATIVE COSTS IS PROPOSED AND DISCUSSED.

RESPONSE:

Confirm.

RESPONSE PROVIDED BY: Black & Veatch Management Consulting, LLC
PA-III-71. PLEASE IDENTIFY THE SPECIFIC DOLLAR AMOUNT OF TAP ADMINISTRATIVE COSTS CURRENTLY BEING COLLECTED IN PWD BASE RATES AS OF JULY 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).

RESPONSE:

Current PWD base rates are based upon the FY 2020 cost of service analysis used to establish rates per the 2018 Rate Determination. Base rates reflect the associated test year cost of service.

Please refer to Response Attachment PA-III-71 to 72.xlsx for further information regarding administrative costs.

RESPONSE PROVIDED BY: Philadelphia Water Department and Black & Veatch Management Consulting, LLC
PA-III-72. 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).

RESPONSE:

Please see to Response Attachment PA-III-71 to 72.xlsx.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-III-73. 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.

RESPONSE:

Any additional costs would either be offset by underspending in other areas and/or supported via additional funding from the Rate Stabilization Fund (RSF).

RESPONSE PROVIDED BY: Black & Veatch Management Consulting, LLC
PA-III-74. 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.

RESPONSE:

The premise of this question is incorrect. TAP administrative costs, used in establishing
the current rates, did not include a 25% contingency. Current PWD base rates are based
upon the FY 2020 cost of service analysis, used to establish rates per the 2018 Rate
Determination. Base rates reflect the associated test year cost of service.

RESPONSE PROVIDED BY: Black & Veatch Management Consulting, LLC
PA-III-75. PLEASE PROVIDE THE GROSS UNCOLLECTIBLES FOR TAP PARTICIPANTS BY YEAR FOR FISCAL YEARS 2018 TO PRESENT INCLUSIVE.

RESPONSE:

Please note there are no reports available that capture the gross uncollectibles for TAP participants. Additionally, the term “gross uncollectibles” is vague and undefined in the discovery request.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-76. PLEASE PROVIDE THE NET UNCOLLECTIBLES FOR WRAP PARTICIPANTS BY YEAR FOR THE FISCAL YEARS 2018 TO PRESENT INCLUSIVE.

RESPONSE:

Please note there are no reports available that capture the net uncollectibles for WRAP participants. Additionally, the term “net uncollectibles” is vague and undefined in the discovery request.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-77. PLEASE PROVIDE PAYMENT PATTERN REPORTS BY MONTH FOR JULY 2017 TO PRESENT LIMITED TO TAP PARTICIPANTS.

RESPONSE:

The FY 2019 Low Income Billing & Payments Report provides payment pattern information for TAP participants. This report was originally provided in Raftelis’ direct testimony as Schedule RFC-9, and is provided again as PA-III-3_Response_C.xls. Monthly data are provided in the raw data tab, “rpt_libp_v2019_03_FY19_20190710.”

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
**PA-III-78. PLEASE DEFINE THE TERMS:**

A. BILLINGS

B. PAYMENTS

C. TOTAL PERCENT COLLECTED

**RESPONSE:**

The response below is in reference to the FY 2019 Payment Patterns report, provided in RFC’s direct testimony as Schedule RFC-6 and in response to PA-III-3, PA-III-55, and PA-III-77.

Billings are defined as service and usage charge transaction types from the basis2 cis_transactions table, with creation dates during the fiscal year in question. Billings do include all City accounts except those designated as PWD accounts; they include only retail customers, excluding any wholesale customers. Total billings are split between Non-Stormwater Only (Non-SWO) and Stormwater Only (SWO) accounts based on the account’s installation designation contained in the basis2 cis_installations table.

Payments for accounts other than City accounts are defined as receipt or transfer credits allocated to Billings (see definition above). Payments are reported only when they link to specific Billings transactions reported for the fiscal year in question. Payments in the ‘Billing Year’ are those that were received by the end of the fiscal year in which they were billed. Payments in ‘Billing year +1’ are those that were received during the subsequent fiscal year. Payments in ‘Billing year +2 and beyond’ are those that were received any time after the subsequent fiscal year. Payments are dated based on their Allocation Date in the basis2 cis_crdr_allocations table.
Total percent collected is calculated as the Total Payments (see definition above) for the time period of interest (Billing Year, Billing Year + 1, or Billing Year + 2 and Beyond) divided by the Total Billings (see definition above) for the fiscal year of interest.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-79. 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.

RESPONSE:

A. Receipts in the Cost of Service Study are defined as follows:

- In the context of retail revenues, receipts refer to the cumulative anticipated actual revenues in each fiscal year, for the water, sanitary sewer, and stormwater services. The cumulative actual revenues of a given fiscal year are estimated as the sum of payments received in “Billing Year,” “Billing Year Plus 1,” and “Billing Year Plus 2 and Beyond.” Please also see the explanation provided in PWD Statement No. 7A, Schedule BV-6: WP-1.

- In the context of wholesale revenues, receipts refer to 100% of billings estimated for each wholesale customer.

B. For the purpose of this response, we assume “RATE LEVELS” referenced in the question above means the annual “level of revenue adjustments” projected in the FY 2021 through FY 2025 financial plan. “Billings” are first projected based on existing rate schedules and projected units of service, for each fiscal year. Appropriate collection factors are then applied to Billings to estimate the actual cumulative “Receipts” for the fiscal year. The annual “revenue adjustments” (RATE LEVELS) for each fiscal year are then calculated based on the estimated cumulative Receipts and the corresponding net revenue requirements of the fiscal year.
The application of collection factors is outlined in Section 4.1.4.3 on page 50 and 51 of the “Water and Waster Cost of Service Report” as provided in PWD Statement No. 7A, Schedule BV-5.

An analogous response was provided during the prior rate proceeding to PA-V-5.

RESPONSE PROVIDED BY:  Black & Veatch Management Consulting, LLC
PA-III-80. PLEASE PROVIDE A COPY OF ALL AGENDAS AND ALL MINUTES OF TAP ADVISORY COMMITTEE MEETINGS FROM JULY 1, 2017 TO PRESENT.

RESPONSE:

TAP Advisory Committee meetings were produced in response to discovery requests PA-V-13 and PA-V-14 in the 2018 rate proceeding and are available on the Rate Board’s webpage.

Recent meeting notes and agendas are provided in response attachment PA-III-80.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-III-81. 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.

RESPONSE:

Please see response to PA-III-80.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-III-82. 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.

RESPONSE:

Please see attached PA-III-82 City Presentations. The attached documents may contain figures and estimates that may no longer represent TAP program performance or other metrics (such as lost revenue). The participant is directed to the current filing before the Water, Sewer and Storm Water Rate Board for current program statistics.

RESPONSE PROVIDED BY:  Randy E. Hayman, Philadelphia Water Department, Michelle L. Bethel-Miller, Water Revenue Bureau, Raftelis Financial Consultants, Inc., and Black & Veatch Management Consulting, LLC.
PA-III-83. 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.

RESPONSE:

Please see attached PA-III-83 Presentations. The attached documents may contain figures and estimates that may no longer represent TAP program performance or other metrics (such as lost revenue). The participant is directed to the current filing before the Water, Sewer and Storm Water Rate Board for current program statistics.

RESPONSE PROVIDED BY: Randy E. Hayman, Philadelphia Water Department, Michelle L. Bethel-Miller, Water Revenue Bureau, Raftelis Financial Consultants, Inc., and Black & Veatch Management Consulting, LLC.
**PA-III-84.**  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, 
FROM JULY 2017 TO PRESENT.

**RESPONSE:**

PWD’s and WRB’s consultants may publish articles in trade journals such as the American 
Water Works Association (AWWA), the National Association of Clean Water Agencies 
(NACWA), the Water Environment Federation (WEF) etc.

The webpages are provided for your ease of use and reference: [https://www.wef.org/](https://www.wef.org/), 
[https://www.awwa.org/](https://www.awwa.org/), and [https://www.nacwa.org/](https://www.nacwa.org/) should you wish to avail yourself of 
materials.

The published articles may contain figures and estimates that may no longer represent 
current performance or metrics. The participant is directed to the current filing before the 
Water, Sewer and Storm Water Rate Board for current statistics and available relevant 
data.

**RESPONSE PROVIDED BY:**  Raftelis Financial Consultants, Inc., and Black & Veatch 
Management Consulting, LLC.
1 PA-III-85. PLEASE PROVIDE BY MONTH SINCE JULY 2017:

A. THE NUMBER OF TAP CUSTOMERS WHOSE ARREARS PRE-
   -EXISTING AS OF THE DATE THEY APPLIED FOR TAP WOULD
   HAVE BEEN SUFFICIENT TO QUALIFY THEM FOR A MUNICIPAL
   LIEN;

B. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY
   ABOVE FOR WHOM PWD (INCLUDING WRB) PERFECTED A LIEN
   FOR THOSE PREEXISTING ARREARS;

C. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS
   UNDERLYING THE LIENS IDENTIFIED IMMEDIATELY ABOVE;

D. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY
   ABOVE FOR WHOM THE LIEN BASED ON PRE-EXISTING
   ARREARS WAS LATER SATISFIED BY THE CUSTOMER PAYING
   THE UNDERLYING DEBT;

E. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS FOR
   WHICH THE LIEN WAS REMOVED AS HAVING BEEN PAID IN
   FULL SUBSEQUENT TO THE PERFECTION OF THE LIEN;

F. THE DOLLARS OF FEES CHARGED TO CUSTOMERS WITH THOSE
   PRE-EXISTING DEBTS WHICH CHARGE WAS BASED ON THE
   PERFECTION OF THE LIEN;

G. THE AVERAGE DOLLARS OF UNPAID WATER BILLS SUBJECT TO
   A LIEN IDENTIFIED IN THIS QUESTION BEFORE ANY CHARGE
   FOR THE LIENING PROCESS WAS IMPOSED;

H. THE AVERAGE DOLLARS OF UNPAID WATER BILLS ONCE THE
   CHARGE FOR THE LIENING PROCESS WAS IMPOSED.
I. THE BASIS FOR ANY/ALL CHARGES IMPOSED ON CUSTOMER ACCOUNTS ASSOCIATED WITH THE PERFECTION OF THE LIEN;

J. THE NUMBER OF TAP CUSTOMERS FOR WHOM THE LIENS IDENTIFIED IN SUB-PARAGRAPH “B” ABOVE WAS SUBSEQUENTLY CANCELLED OR OTHERWISE REMOVED FOR REASONS OTHER THAN THE PAYMENT OF THE UNDERLYING DEBT.

RESPONSE:

In response to PA-III-85-I, the $91.45 filing fee, as mandated by 42 Pa.C.S. § 1725 et seq., 42 Pa.C.S. § 3733, 72 P.S. § 3172, and First Judicial District of Pennsylvania Administrative Order 2008-01, is the basis for any/all charges imposed on customer accounts associated with the perfection of the lien.

Please note there are no reports available that capture data for the remaining subsections of this interrogatory.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-86. PLEASE PROVIDE BY MONTH SINCE JULY 2017:

A. THE NUMBER OF TAP CUSTOMERS WHOSE ARREARS INCURRED SUBSEQUENT TO THE DATE THEY APPLIED FOR TAP WOULD HAVE BEEN SUFFICIENT TO QUALIFY THEM FOR A MUNICIPAL LIEN;

B. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY ABOVE FOR WHOM PWD (INCLUDING WRB) PERFECTED A LIEN FOR THOSE IN-PROGRAM ARREARS;

C. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS UNDERLYING THE LIENS IDENTIFIED IMMEDIATELY ABOVE;

D. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS FOR WHICH THE LIEN WAS REMOVED AS HAVING BEEN PAID IN FULL SUBSEQUENT TO THE PERFECTION OF THE LIEN;

E. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY ABOVE FOR WHOM THE LIEN BASED ON IN-PROGRAM ARREARS WAS LATER SATISFIED BY THE CUSTOMER PAYING THE UNDERLYING DEBT;

F. THE DOLLARS OF FEES CHARGED TO CUSTOMERS WITH THOSE PRE-EXISTING DEBTS WHICH CHARGE WAS BASED ON THE PERFECTION OF THE LIEN;

G. THE BASIS FOR ANY/ALL CHARGES IMPOSED ON CUSTOMER ACCOUNTS ASSOCIATED WITH THE PERFECTION OF THE LIEN;

H. THE NUMBER OF TAP CUSTOMERS FOR WHOM THE LIENS IDENTIFIED IN SUB-PARAGRAPH “B” ABOVE WAS SUBSEQUENTLY CANCELLED OR OTHERWISE REMOVED FOR
REASONS OTHER THAN THE PAYMENT OF THE UNDERLYING DEBT.

RESPONSE:

In response to PA-III-86-G, the $91.45 filing fee, as mandated by 42 Pa.C.S. § 1725 et seq., 42 Pa.C.S. § 3733, 72 P.S. § 3172, and First Judicial District of Pennsylvania Administrative Order 2008-01, is the basis for any/all charges imposed on customer accounts associated with the perfection of the lien.

Please note there are no reports available that capture data for the remaining subsections of this interrogatory.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA III-87. PLEASE PROVIDE BY MONTH SINCE JULY 2017:

A. THE NUMBER OF TAP CUSTOMERS WHOSE ARREARS INCURRED SUBSEQUENT TO THE DATE THEY APPLIED FOR TAP WOULD NOT HAVE BEEN SUFFICIENT TO QUALIFY THEM FOR A MUNICIPAL LIEN, BUT WHOSE IN-PROGRAM ARREARS IN COMBINATION WITH PRE-EXISTING ARREARS WOULD HAVE BEEN SUFFICIENT TO QUALIFY THEM FOR A MUNICIPAL LIEN;

B. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY ABOVE FOR WHOM PWD (INCLUDING WRB) PERFECTED A LIEN FOR THOSE COMBINED IN-PROGRAM AND PRE-EXISTING ARREARS;

C. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS UNDERLYING THE LIENS IDENTIFIED IMMEDIATELY ABOVE;

D. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS FOR WHICH THE LIEN WAS REMOVED AS HAVING BEEN PAID IN FULL SUBSEQUENT TO THE PERFECTION OF THE LIEN;

E. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY ABOVE FOR WHOM THE LIEN BASED ON COMBINED IN-PROGRAM AND PRE-EXISTING ARREARS WAS LATER SATISFIED BY THE CUSTOMER PAYING THE UNDERLYING DEBT;

F. THE DOLLARS OF FEES CHARGED TO CUSTOMERS WITH THOSE COMBINED IN-PROGRAM AND PRE-EXISTING DEBTS WHICH CHARGE WAS BASED ON THE PERFECTION OF THE LIEN;
G. THE BASIS FOR ANY/ALL CHARGES IMPOSED ON CUSTOMER ACCOUNTS ASSOCIATED WITH THE PERFECTION OF THE LIEN;

H. THE NUMBER OF TAP CUSTOMERS FOR WHOM THE LIENS IDENTIFIED IN SUB-PARAGRAPH “B” ABOVE WAS SUBSEQUENTLY CANCELLED OR OTHERWISE REMOVED FOR REASONS OTHER THAN THE PAYMENT OF THE UNDERLYING DEBT.

RESPONSE:

In response to PA-III-87-G, the $91.45 filing fee, as mandated by 42 Pa.C.S. § 1725 et seq., 42 Pa.C.S. § 3733, 72 P.S. § 3172, and First Judicial District of Pennsylvania Administrative Order 2008-01, is the basis for any/all charges imposed on customer accounts associated with the perfection of the lien.

Please note there are no reports available that capture data for the remaining subsections of this interrogatory.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-88. PLEASE PROVIDE A DETAILED DESCRIPTION OF THE POLICY OF PWD (INCLUDING WRB) ON WHETHER OR NOT TO PERFECT A LIEN ON THE UNPAID WATER BILLS OF A TAP PARTICIPANT AS OF:

A. JULY 1, 2017;
B. JULY 1, 2018
C. JULY 1, 2019
D. JANUARY 1, 2020.

RESPONSE:

As of January 1, 2020, WRB was able to implement its policy to perfect a lien on the unpaid water bills of a TAP participant. TAP participants are liened using the same rules that are applied to other WRB customers, namely: the unpaid debt must total $1,000 or more; the unpaid debt has not been previously liened, is not in dispute, and is not protected by an active bankruptcy; and the customer had been notified via a message on their bill of the intent to file a lien for the water/sewer delinquency.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-89. IF THERE WAS A CHANGE IN POLICY FROM ONE DATE TO THE NEXT
AS IDENTIFIED ABOVE, PLEASE IDENTIFY THE DATE ON WHICH THE
POLICY WAS CHANGED, IDENTIFY THE PERSON OR ENTITY MAKING
FINAL APPROVAL OF THE CHANGE IN POLICY, AND PROVIDE A
DETAILED DESCRIPTION OF THE BASIS FOR THE CHANGE IN POLICY.

RESPONSE:

There was no change in policy. Implementation was not deployed until January 1, 2020,
due to IT resources being devoted to the initial implementation and development of the
TAP program.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-90. PLEASE PROVIDE A SINGLE COPY OF ALL COMMUNICATIONS FROM JULY 1, 2017 TO PRESENT TO ALL OR ANY SINGLE MEMBER OF THE PHILADELPHIA CITY COUNCIL REGARDING THE PWD POLICY ON WHETHER TO IMPOSE A LIEN ON TAP ACCOUNTS:

A. FOR ARREARS THAT WERE PRE-EXISTING AT THE TIME A CUSTOMER BECAME A TAP PARTICIPANT;
B. FOR ARREARS THAT WERE INCURRED BY A TAP PARTICIPANT SUBSEQUENT TO THEIR ENROLLMENT IN TAP;
C. FOR A COMBINATION OF ARREARS THAT WERE PRE-EXISTING AND THOSE THAT WERE INCURRED SUBSEQUENT TO TAP ENROLLMENT.

RESPONSE:

Please note that liens are a function of the Department of Revenue, therefore lien policies are developed by the Department of Revenue and not the Philadelphia Water Department.

To my knowledge, there are no communications available that capture the information requested.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-91. PLEASE PROVIDE, IN AN ACTIVE EXCEL SPREADSHEET WITH ALL
FORMULAE INTACT, CURRENT FOR THE MOST RECENT DATE
POSSIBLE, A LIST OF ALL CURRENT OR FORMER TAP PARTICIPANTS
WHO, SUBSEQUENT TO JULY 1, 2017, HAD A LIEN FILED FOR AN
UNPAID WATER BILL, IDENTIFYING THE FOLLOWING DATA FOR
EACH CUSTOMER:

A. THE TOTAL NUMBER OF LIENS, ALONG WITH THE DATE ON
WHICH THEY WERE FILED, FOR UNPAID WATER BILLS;

B. FOR EACH SEPARATE LIEN, THE AMOUNT OF UNPAID WATER
BILL MADE SUBJECT TO THE LIEN;

C. WHETHER EACH SEPARATE LIEN WAS FOR A PRE-EXISTING
ARREARAGE (I.E., ARREARS EXISTING AT THE TIME THE
CUSTOMER BECAME A TAP PARTICIPANT);

D. WHETHER EACH SEPARATE LIEN WAS FOR AN IN-PROGRAM
ARREARAGES (I.E., ARREARS INCURRED SUBSEQUENT TO
BECOMING A TAP PARTICIPANT);

E. WHETHER THE LIEN WAS SUBSEQUENTLY REMOVED OR
OTHERWISE CANCELLED BECAUSE OF A PAYMENT-IN-FULL OF
THE LIENED AMOUNT;

F. THE DOLLAR AMOUNT OF THE LIEN THAT WAS REMOVED OR
OTHERWISE CANCELLED DUE TO A PAYMENT-IN-FULL OF THE
LIENED AMOUNT;

G. WHETHER THE LIEN WAS SUBSEQUENTLY REMOVED OR
OTHERWISE CANCELLED FOR REASONS OTHER THAN FULL
PAYMENT OF THE LIENED AMOUNT;
H. THE DOLLAR AMOUNT OF THE LIEN THAT WAS REMOVED OR OTHERWISE CANCELLED FOR REASONS OTHER THAN FULL PAYMENT OF THE LIENED AMOUNT;

I. WHETHER THE CUSTOMER IS CURRENTLY AN ACTIVE TAP PARTICIPANT;

J. WHETHER THE CUSTOMER IS CURRENTLY AN ACTIVE PWD CUSTOMER, BUT NOT CURRENTLY AN ACTIVE TAP PARTICIPANT;

K. WHETHER THE CUSTOMER WAS DISCONNECTED FOR NONPAYMENT SUBSEQUENT TO THE DATE ON WHICH A LIEN WAS PLACED.

RESPONSE:

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

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-92. REFERENCE: PWD STATEMENT NO. 7, PAGES 7 - 8: 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.

RESPONSE:

Preparation of this response is in progress and will be provided in the future.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-93.  REFERENCE: PWD STATEMENT NO. 7, PAGE 8: 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.

RESPONSE:

Preparation of this response is in progress and will be provided in the future.

RESPONSE PROVIDED BY:  Raftelis Financial Consultants, Inc.
PA-III-94. FOR EACH FISCAL YEAR 2017 TO PRESENT INCLUSIVE (2020 YEAR TO DATE), PLEASE PROVIDE BOTH THE NUMBER AND PERCENTAGE OF PAYMENTS RECEIVED FROM RESIDENTIAL CUSTOMERS VIA THE FOLLOWING PAYMENT CHANNELS: MAIL, ONLINE, AUTO DEBIT, CREDIT/DEBIT CARD, PAYMENT AGENTS, OTHER.

RESPONSE:

See attached PA-III-94 Payment Channel Number Report. Please note that in FY 2017 and FY 2018 Credit/Debit Card payments were not reported separately, but as part of Online payments.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-95. PLEASE PROVIDE THE SAME DATA AS PRESENTED IMMEDIATELY
ABOVE EXCEPT IN DOLLAR TERMS RATHER THAN IN TERMS OF
NUMBER OF PAYMENTS.

RESPONSE:
See attached PA-III-95 Payment Channel Dollar Report. Please note that in FY 2017 and
FY 2018 Credit/Debit Card payments were not reported separately, but as part of Online
payments.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-96. FOR EACH FISCAL YEAR, 2017 TO PRESENT INCLUSIVE (2020 YEAR TO DATE), PLEASE PROVIDE BOTH THE NUMBER AND PERCENTAGE OF PAYMENTS RECEIVED FROM RESIDENTIAL CUSTOMERS VIA THE FOLLOWING PAYMENT MECHANISMS: CASH, CHECK, DEBIT CARD, CREDIT CARD, ACH CREDIT, ACH DEBIT, PREPAID EBT CARDS, MOBILE APP.

RESPONSE:

See attached PA-III-96 Payment Type Number Report.

<table>
<thead>
<tr>
<th>Payment Type</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACH</td>
<td>Automated Clearing House (wire transfer) includes all wire transfer transactions and is not broken down into debit or credit.</td>
</tr>
<tr>
<td>ALL1</td>
<td>Alliance One (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods</td>
</tr>
<tr>
<td>ECK</td>
<td>Electronic Check payment via City's web-based payment portal including but not limited to the Mobile App</td>
</tr>
<tr>
<td>IVR</td>
<td>Interactive Voice Response (payment by phone) includes credit/debit card and prepaid EBT card payments but cannot be broken down into those categories</td>
</tr>
<tr>
<td>OTHER</td>
<td>Sheriff Sale payments, Field Service Representative collected payments, and bulk receipts.</td>
</tr>
<tr>
<td>PENN</td>
<td>Penn Credit (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods</td>
</tr>
<tr>
<td>POS</td>
<td>Point of Sale (in person payment) includes cash, check, money order, credit/debit card, and prepaid EBT card payments but cannot be broken down into those categories</td>
</tr>
<tr>
<td>RCB</td>
<td>Revenue Collection Bureau (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods</td>
</tr>
</tbody>
</table>
**REMITPRO** | Mailed-in checks and money orders.
---|---
**WEB** | Payment via the City's web-based payment portal, including but not limited to the Mobile App, includes credit/debit card and prepaid EBT card payments but cannot be broken down into those categories
**ZC** | ZipCheck, automated direct debit via PNC Bank
**ZP** | ZipPhone, automated bank debit from customer's bank and/or third party pay station

**RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau
**PA-III-97.** PLEASE PROVIDE THE SAME DATA AS PRESENTED IMMEDIATELY ABOVE EXCEPT IN DOLLAR TERMS RATHER THAN IN TERMS OF NUMBER OF PAYMENTS.

**RESPONSE:**

See attached PA-III-97 Payment Type Dollar Report.

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<tr>
<td>Code</td>
<td>Description</td>
</tr>
<tr>
<td>------</td>
<td>-------------</td>
</tr>
<tr>
<td>ZC</td>
<td>ZipCheck, automated direct debit via PNC Bank</td>
</tr>
<tr>
<td>ZP</td>
<td>ZipPhone, automated bank debit from customer's bank and/or third party pay station</td>
</tr>
</tbody>
</table>

**RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-98. FOR EACH FISCAL YEAR 2017 TO PRESENT INCLUSIVE (2020 YEAR TO DATE), PLEASE PROVIDE THE DOLLARS OF REVENUE GENERATED FROM RESIDENTIAL CUSTOMERS THROUGH THE $3.95 FEE FOR DEBIT/CREDIT CARD TRANSACTIONS.

RESPONSE:

There is no report available that captures the data requested because there is no City revenue generated from residential customers through the $3.95 fee for debit/credit card transactions as the fee is collected by and for the City’s third-party vendors. Additionally, please note that the residential debit/credit card transaction fee was lowered from $3.95 to $2.95 in October 2019.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-99. IF THE RESPONSE TO THE QUESTION IMMEDIATELY ABOVE IS NOT
THE PRODUCT OF THE NUMBER OF PAYMENTS IDENTIFIED ABOVE
TIMES $3.95, PLEASE PROVIDE AN EXPLANATION OF WHY NOT.

RESPONSE:

Please see response to PA-III-98.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-100. PLEASE PROVIDE A DETAILED EXPLANATION OF THE RATEMAKING TREATMENT OF THE REVENUE REPORTED IN QUESTION #5 ABOVE.

RESPONSE:

Revenues derived from the customer fees referenced in PA-III-5, are considered miscellaneous revenues, which are net from the system operating expenses (see Line 10 of Tables W-10 and WW-10, PWD Statement 7A, Schedule BV-1).

The Department does not have customer classes.

RESPONSE PROVIDED BY: Black & Veatch Management Consulting, LLC.
PA-III-101. PLEASE PROVIDE A DETAILED COST BASIS FOR THE $3.95 RESIDENTIAL FEE FOR CREDIT AND DEBIT CARD TRANSACTIONS.

RESPONSE:

There is no cost basis for the residential fee for credit and debit card transactions.

Additionally, please see response to PA-III-98.

RESPONSE PROVIDED BY: Melissa LaBuda, Philadelphia Water Department
PA-III-102. PLEASE PROVIDE, BY YEAR FOR FISCAL YEARS 2020, 2021 AND 2022, A
PROJECTION OR ESTIMATE OF THE LOST REVENUE THAT WOULD BE
EXPERIENCED SHOULD PWD NOT CHARGE THE $3.95 FEE PER
CREDIT/DEBIT CARD TRANSACTION.

RESPONSE:
The transaction fee is governed by the terms of the contract with the vendor. The fee is not
a revenue to the Water Department as such there is no lost revenue. Additionally, please
note that the residential debit/credit card transaction fee was lowered from $3.95 to $2.95
in October 2019.

RESPONSE PROVIDED BY: Melissa LaBuda, Philadelphia Water Department
PA-III-103. PLEASE PROVIDE A COMPREHENSIVE LIST OF MUNICIPAL WATER UTILITIES THAT DO NOT CHARGE A FEE FOR CREDIT/DEBIT CARD TRANSACTIONS.

RESPONSE:

There are no documents or reports responsive to this request.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-104. PLEASE PROVIDE A COMPREHENSIVE LIST OF REGULATED PENNSYLVANIA UTILITIES THAT DO NOT CHARGE A FEE FOR CREDIT/DEBIT CARD TRANSACTIONS.

PLEASE PROVIDE A COMPREHENSIVE LIST OF PHILADELPHIA MUNICIPAL OFFICES/PROGRAMS THAT DO NOT CHARGE A FEE FOR DEBIT/CREDIT CARD TRANSACTIONS WITH THAT OFFICE.

RESPONSE:

To my knowledge, there is not a comprehensive list that captures the information requested in this interrogatory.

RESPONSE PROVIDED BY: Michelle L. Bethel-Miller, Water Revenue Bureau
PA-III-105. PROVIDE THAT SAME DATA REQUESTED IN PA-III-57 FOR TAP PARTICIPANTS.

RESPONSE:

Preparation of this response is in progress and will be provided in the future.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-106. PLEASE IDENTIFY ANY CLUSTERS OF ENGLISH AS A SECOND LANGUAGE (“ESL”) CUSTOMERS THAT EXIST IN THE PWD SERVICE TERRITORY BY COMMUNITY, ZIP CODE, CENSUS TRACT, OR OTHER GEOGRAPHIC REGION OR AREA BY WHICH ESL IS TRACKED. SEPARATELY PROVIDE A DETAILED EXPLANATION OF HOW CLUSTERS OF ESL CUSTOMERS ARE IDENTIFIED.

RESPONSE:

At this time, PWD is not aware of any reports that capture this data.

RESPONSE PROVIDED BY: Philadelphia Water Department