

PHILADELPHIA WATER DEPARTMENT  
PA INTERROGATORY SET #III

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

Dated: March 2020

1 **General Response to PA-SET-III:**

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

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6 Rate Proceeding Participants should refer to PWD Statements 6, 7A, and 7B for  
7 information regarding the data used as the basis for or in support of the development of  
8 the Water Department's proposed rates and charges and related matters.

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1 **PA-III-1.** PLEASE PROVIDE DEPARTMENT ACCOUNTS RECEIVABLE AGING  
2 REPORTS BY MONTH FOR THE MOST RECENT 24 MONTHS  
3 AVAILABLE, INCLUDING WITHIN EACH AGING BUCKET: (A) THE  
4 NUMBER OF ACCOUNTS; (B) THE DOLLARS OF RECEIVABLE; AND (C)  
5 THE AVERAGE BALANCE PER ACCOUNT.

6 A. SEPARATELY PROVIDE FOR NON-RESIDENTIAL ACCOUNTS;

7 B. SEPARATELY PROVIDE FOR RESIDENTIAL ACCOUNTS;

8 C. SEPARATELY PROVIDED FOR TAP PARTICIPANT ACCOUNTS.

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10 **RESPONSE:**

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

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

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

7 A. SEPARATELY PROVIDE FOR RESIDENTIAL ACCOUNTS;

8 B. SEPARATELY PROVIDE FOR TAP PARTICIPANT ACCOUNTS.

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10 **RESPONSE:**

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

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

- 5 A. SEPARATELY PROVIDE FOR NON-RESIDENTIAL ACCOUNTS;  
6 B. SEPARATELY PROVIDE FOR RESIDENTIAL ACCOUNTS;  
7 C. SEPARATELY PROVIDE FOR TAP PARTICIPANT ACCOUNTS.  
8

9 **RESPONSE:**

10 The FY 2019 Payment Patterns Report, originally provided in Raftelis' direct testimony as  
11 Schedule RFC-6 and provided again here as PA-III-3\_Response\_AB.xls, addresses parts  
12 (a) and (b) of this request. Non-residential and Residential accounts are separated in the  
13 raw data tabs, each beginning with "FY." The FY 2019 Low Income Billing & Payments  
14 Report provides similar data for TAP participants, addressing part (c) of this request. This  
15 report was originally provided in Raftelis' direct testimony as Schedule RFC-9, and is  
16 provided again as PA-III-3\_Response\_C.xls.  
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18 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**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.

Description	Justification	Fee Amount
Lien Fee	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	\$91.45
Dishonored Check Fee	Philadelphia Code Section 19-2809(7)(f)	\$20.00
Penalty for Late Payment	Penalty mandated by Philadelphia Code Section 19-1606(2).  (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.

1 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau

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1 **PA-III-5.** FOR EACH RESIDENTIAL CUSTOMER FEE IDENTIFIED IN RESPONSE TO  
2 THE IMMEDIATELY PRECEDING QUESTION, PLEASE PROVIDE FOR  
3 THE MOST RECENT 24 MONTHS AVAILABLE: (A) THE NUMBER OF  
4 ACCOUNTS BEING CHARGED THAT FEE; AND (B) THE AGGREGATE  
5 DOLLARS CHARGED FOR THAT FEE.

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7 **RESPONSE:**

8 See response attachment PA-III-5 Fee Report.

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11 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau

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1 **PA-III-6.** BY MONTH FOR EACH THE MOST RECENT 24 MONTHS AVAILABLE,  
2 PLEASE PROVIDE FOR RESIDENTIAL ACCOUNTS:

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

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

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

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

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

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

21 (G) THE NUMBER OF DEFAULTED DEFERRED PAYMENT  
22 ARRANGEMENTS;

23 (H) THE NUMBER OF DEFAULTED DEFERRED PAYMENT  
24 ARRANGEMENTS DISAGGREGATED BY THEIR TERM (IN  
25 MONTHS) OF THE NUMBER OF INSTALLMENT PAYMENTS;

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(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

1 **PA-III-7.** PLEASE PROVIDE BY MONTH FOR THE MOST RECENT 24 MONTHS

2 AVAILABLE, THE NUMBER OF:

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

7 B. RESIDENTIAL DISCONNECTIONS FOR NONPAYMENT.  
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9 **RESPONSE:**

10 See response attachment PA-III-7 Shut Off Report.  
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12 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-8.** PLEASE PROVIDE BY MONTH FOR THE MOST RECENT 24 MONTHS  
2 AVAILABLE:  
3 A. THE NUMBER OF ACCOUNTS RECONNECTED SUBSEQUENT TO  
4 A DISCONNECTION FOR NONPAYMENT.  
5 B. THE AVERAGE TIME BETWEEN DISCONNECTION AND  
6 RECONNECTION.  
7 C. A DISTRIBUTION IN REASONABLE BANDS OF HOW LONG A  
8 CUSTOMER WAS “OFF” THE SYSTEM (SUGGESTED BANDS; LESS  
9 THAN 1 DAY, 1-3 DAYS, 3-7 DAYS, 7-30 DAYS, MORE THAN 30  
10 DAYS).

11  
12 **RESPONSE:**

13 See response attachment PA-III-8 Restoration Report.

14  
15 Please note there are no reports available that capture data for “(B) the average time  
16 between disconnection and reconnection” and “(C) a distribution in reasonable bands of  
17 how long a customer was “off” the system (suggested bands; less than 1 day, 1-3 days, 3-7  
18 days, 7-30 days, more than 30 days).”

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20 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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- 1 **PA-III-9.** OF THE RESIDENTIAL ACCOUNTS RECEIVING A NOTICE OF AN  
2 IMPENDING DISCONNECTION FOR NONPAYMENT, FOR EACH MONTH  
3 FOR THE MOST RECENT 24 MONTHS AVAILABLE, PLEASE PROVIDE:
- 4 (A) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE  
5 THEIR SERVICE DISCONNECTED BY THE DATE SPECIFIED IN  
6 THE DISCONNECT NOTICE;
- 7 (B) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE  
8 THEIR SERVICE DISCONNECTED FOR NONPAYMENT AFTER  
9 RECEIVING A DISCONNECT NOTICE FOR NONPAYMENT THAT  
10 VOLUNTARILY TERMINATED THEIR ACCOUNTS;
- 11 (C) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE  
12 THEIR SERVICE DISCONNECTED BECAUSE THE CUSTOMER  
13 PAID THEIR BILLS IN FULL PRIOR TO THEIR SCHEDULED  
14 DISCONNECTION;
- 15 (D) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE  
16 THEIR SERVICE DISCONNECTED BECAUSE THE CUSTOMER  
17 PAID THEIR BILLS LESS THAN IN FULL BUT SUFFICIENT TO  
18 AVOID THEIR SCHEDULED DISCONNECTION;
- 19 (E) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE  
20 THEIR SERVICE DISCONNECTED EVEN THOUGH THEY  
21 RETAINED AN ARREARS THAT WAS SUFFICIENT LARGE (OR  
22 SUFFICIENTLY OLD) TO TRIGGER A DISCONNECTION); AND
- 23 (F) THE TOTAL NUMBER OF ACCOUNTS ON WHICH ACCOUNT NO  
24 PAYMENTS WERE MADE PRIOR TO THE ISSUANCE OF THE  
25 NEXT BILL AFTER ISSUANCE OF THE DISCONNECT NOTICE.

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**RESPONSE:**

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

**RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau

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**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

1 **PA-III-11.** FOR THE MOST RECENT 24-MONTH PERIOD AVAILABLE, BY MONTH  
2 FOR RESIDENTIAL ACCOUNTS, PLEASE PROVIDE:

- 3 A. WHAT PERCENTAGE OF BILLS WAS PAID BY THE DUE DATE OF  
4 THE BILL;
- 5 B. WHAT PERCENTAGE OF BILLS WAS PAID BY THE TIME THE  
6 NEXT MONTH'S BILL IS RENDERED;
- 7 C. WHAT PERCENTAGE OF THOSE BILLS WAS PAID BY THE TIME  
8 THE SECOND SUBSEQUENT BILL IS RENDERED; AND
- 9 D. WHAT PERCENTAGE OF THOSE BILLS WAS PAID BY THE TIME  
10 THE THIRD SUBSEQUENT BILL IS RENDERED.

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12 **RESPONSE:**

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

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15 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-12.** IN A TYPICAL MONTH, WITH DAY 1 BEING THE DAY A BILL IS ISSUED,  
2 PLEASE PROVIDE THE PERCENTAGE OF RESIDENTIAL ACCOUNTS  
3 MAKING PAYMENTS BY DAY THROUGH DAY 60. IF REPORTING OF  
4 SUCH DATA IS ONLY BY A TIME PERIOD OTHER THAN A DAY (E.G.,  
5 WEEKLY), PROVIDE BY THE REPORTING BY THAT TIME PERIOD.  
6

7 **RESPONSE:**

8 Please note there are no reports available that capture this data daily. See response to PA-  
9 III-11 for available data.  
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11 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-13.** PLEASE PROVIDE BY MONTH FOR EACH MONTH FOR THE MOST  
2 RECENT 24 MONTHS AVAILABLE:

- 3 A. THE AVERAGE BILL FOR ALL RESIDENTIAL ACCOUNTS;  
4 B. THE AVERAGE ARREARS OF RESIDENTIAL ACCOUNTS IN  
5 ARREARS;  
6 C. THE AVERAGE BILL OF RESIDENTIAL ACCOUNTS IN ARREARS;  
7 D. THE TOTAL DOLLARS OF RESIDENTIAL ARREARS;  
8 E. THE PERCENTAGE OF RESIDENTIAL DOLLARS CONSTITUTING  
9 ARREARS;  
10 F. THE PERCENTAGE OF BILLED RESIDENTIAL ACCOUNTS  
11 HAVING ARREARS; AND  
12 G. THE AVERAGE ARREARS OF ALL RESIDENTIAL ACCOUNTS  
13 DISCONNECTED FOR NONPAYMENT IN THAT MONTH.

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15 **RESPONSE:**

16 Please note there are no reports available that capture this data.  
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18 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-14.** PLEASE PROVIDE A COPY OF A TYPICAL RESIDENTIAL NOTICE OF  
2 DISCONNECTION FOR NONPAYMENT PRINTED IN EACH OF THE  
3 FOLLOWING MONTHS:

- 4 A. APRIL 2019;  
5 B. AUGUST 2019.  
6 C. NOVEMBER 2019;  
7 D. JANUARY 2020.

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

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12 **RESPONSE:**

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

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

2 AVAILABLE, PLEASE PROVIDE:

- 3 A. THE AVERAGE BILL FOR RESIDENTIAL ACCOUNTS AT  
4 EXISTING RATES PROVIDED IN SUFFICIENT DETAIL  
5 (INCLUDING ALL INPUT VARIABLES) TO PERMIT REPLICATION.  
6 B. THE SAME BILL INFORMATION USING THE PROPOSED RATES  
7 RATHER THAN THE EXISTING RATES.  
8

9 **RESPONSE:**

10 As detailed in PWD Statement 6, Schedule RFC-1, Page 1, the typical residential  
11 customer utilizes 5 ccf (or 500 cf) of water per month. The majority of residential  
12 customers have 5/8" service lines. The requested information is provided on page 12 of  
13 PWD Statement 7A, Schedule BV-5: Water and Wastewater Cost of Service Report and is  
14 reproduced below. The table provides the typical bills based upon the existing (FY 2020)  
15 rates as well as the proposed FY 2021 FY 2022 rates.  
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1	USAGE CHARGES	FY 2020	FY 2021	FY 2022
2	Water Quantity Charge	\$22.76	\$24.64	\$25.87
3	<u>Sewer Quantity Charge</u>	<u>\$16.21</u>	<u>\$17.52</u>	<u>\$18.83</u>
4	Subtotal	\$38.97	\$42.16	\$44.70
5				
6	STORMWATER CHARGES	\$15.80	\$17.80	\$19.15
7				
8	SERVICE CHARGES			
9	For a 5/8-inch meter:	\$12.22	\$12.69	\$13.34
10				
11	<u>TOTAL MONTHLY BILL</u>	<u>\$66.99</u>	<u>\$72.65</u>	<u>\$77.19</u>

The above figures for are based upon rates effective September 1<sup>st</sup> 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

1 **PA-III-16.** BY MONTH FOR THE MOST RECENT 24 MONTHS AVAILABLE, PLEASE

2 PROVIDE:

3 A. THE DOLLARS OF RESIDENTIAL LATE FEE REVENUE

4 COLLECTED; AND

5 B. THE NUMBER OF RESIDENTIAL ACCOUNTS PAYING A LATE

6 CHARGE.

7

8 **RESPONSE:**

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

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11 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau

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1 **PA-III-17.** PLEASE PROVIDE A SINGLE COPY OF ALL STUDIES WITHIN PWD'S  
2 CUSTODY OR CONTROL DOCUMENTING THE EFFECTIVENESS OF A  
3 LATE PAYMENT CHARGE AS AN INCENTIVE TO PAY FOR:

- 4 A. RESIDENTIAL UTILITY CUSTOMERS.  
5 B. LOW-INCOME RESIDENTIAL CUSTOMERS.

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7 **RESPONSE:**

8 There are no studies available that capture the information requested.

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10 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau

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1 **PA-III-18.** PLEASE PROVIDE ALL WRITTEN STUDIES CURRENTLY WITHIN PWD'S  
2 CUSTODY OR CONTROL, WHETHER OR NOT PREPARED BY OR FOR  
3 THE PWD, THAT EXPLICITLY ASSESS THE EXTENT TO WHICH THE  
4 FOLLOWING ACTIVITIES REDUCE RESIDENTIAL BAD DEBT:

- 5 A. DEFERRED PAYMENT AGREEMENTS;
- 6 B. DISCONNECTIONS FOR NONPAYMENT;
- 7 C. BUDGET BILLING PLANS;
- 8 D. LATE PAYMENT CHARGES.

9  
10 **RESPONSE:**

11 There are no studies available that capture the information requested.  
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13 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-19.** PLEASE PROVIDE ALL WRITTEN STUDIES CURRENTLY WITHIN PWD'S  
2 CUSTODY OR CONTROL, WHETHER OR NOT PREPARED BY OR FOR  
3 PWD, THAT EXPLICITLY ASSESS THE EXTENT TO WHICH THE  
4 FOLLOWING ACTIVITIES REDUCE RESIDENTIAL ARREARS:

- 5 A. DEFERRED PAYMENT AGREEMENTS;
- 6 B. DISCONNECTIONS FOR NONPAYMENT;
- 7 C. BUDGET BILLING PLANS;
- 8 D. LATE PAYMENT CHARGES.

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10 **RESPONSE:**

11 There are no studies available that capture the information requested.

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13 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau

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1 **PA-III-20.** PLEASE PROVIDE A COPY OF:

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

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

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11 **RESPONSE:**

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

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15 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau

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1 **PA-III-21.** PLEASE PROVIDE A COPY OF ALL REPORTS, EVALUATIONS, MEMOS,  
2 ANALYSES OR OTHER WRITTEN DOCUMENTS OF ANY NATURE  
3 PREPARED SINCE JANUARY 2015 ESTABLISHING PERFORMANCE  
4 INDICATOR TARGETS TO BE MET WITHIN THE NEXT YEAR AFTER  
5 PUBLICATION OF THE PERFORMANCE TARGETS; WITHIN THE NEXT  
6 TWO YEARS AFTER PUBLICATION OF THE PERFORMANCE TARGETS;  
7 OR WITHIN THE NEXT THREE YEARS AFTER PUBLICATION OF THE  
8 PERFORMANCE TARGETS, WITH RESPECT TO:  
9 A. DEBT PREVENTION;  
10 B. DEBT MANAGEMENT;  
11 C. THE TREATMENT OF VULNERABLE CUSTOMERS;  
12 D. CUSTOMER SATISFACTION.

13  
14 **RESPONSE:**

15 There are no studies available that capture the information requested.  
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17 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-22.** PLEASE PROVIDE A SINGLE COPY OF ANY REPORT, EVALUATION,  
2 STUDY OR OTHER WRITTEN DOCUMENT OF ANY NATURE, WITHIN  
3 THE CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED  
4 BY OR FOR PWD, DATED WITHIN THE PAST FIVE YEARS,  
5 IDENTIFYING, EVALUATING OR OTHERWISE DISCUSSING WHY  
6 NONPAYING RESIDENTIAL CUSTOMERS DO NOT MAKE CONTACT  
7 WITH THE UTILITY WHEN, IN RESPONSE TO BILL NONPAYMENT,  
8 THOSE NONPAYING CUSTOMERS RECEIVE A REQUEST OR NOTICE TO  
9 CONTACT A UTILITY TO AVOID THE DISCONNECTION OF SERVICE.

10  
11 **RESPONSE:**

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

14  
15 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-23.** PLEASE PROVIDE A SINGLE COPY OF ANY REPORT, EVALUATION,  
2 STUDY OR OTHER WRITTEN DOCUMENT OF ANY NATURE, WITHIN  
3 THE CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED  
4 BY OR FOR PWD, DATED WITHIN THE PAST FIVE YEARS,  
5 IDENTIFYING, EVALUATING OR OTHERWISE DISCUSSING WHY  
6 RESIDENTIAL CUSTOMERS DO NOT SUCCESSFULLY COMPLETE  
7 DEFERRED PAYMENT PLANS (SOMETIMES KNOWN AS PAYMENT  
8 AGREEMENTS OR OTHER SIMILAR TERMS) IN ORDER TO AVOID THE  
9 DISCONNECTION OF SERVICE FOR NONPAYMENT.

10  
11 **RESPONSE:**

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

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

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

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

6  
7 **RESPONSE:**

8 See response attached PA-III-24 Zip Code Report for available information.

9

10 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau

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1 **PA-III-25.** FOR THE MOST RECENT 12 MONTH PERIOD AVAILABLE, PLEASE  
2 PROVIDE ANY INFORMATION THAT IS AVAILABLE THAT IS BROKEN  
3 DOWN GEOGRAPHICALLY (E.G., ZIP CODE, CENSUS TRACT)  
4 REGARDING:  
5 A. BILLINGS;  
6 B. PAYMENTS;  
7 C. ARREARS;  
8 D. DISCONNECTIONS, RECONNECTIONS;  
9 E. PAYMENT PLANS.  
10 F. OTHER CREDIT AND COLLECTION ACTIVITIES.

11  
12 **RESPONSE:**

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

16  
17 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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- 1 **PA-III-26.** PLEASE PROVIDE, BY MONTH SINCE JULY 2017:
- 2 A. THE NUMBER OF NEW TAP NEW ENROLLEES.
- 3 B. THE TOTAL NUMBER OF TAP PARTICIPANTS.
- 4 C. THE NUMBER OF TAP NEW ENROLLEES HAVING PREPROGRAM
- 5 ARREARS AT THE TIME OF ENROLLMENT.
- 6 D. THE AGGREGATE DOLLARS OF PREPROGRAM ARREARS FOR
- 7 TAP NEW ENROLLEES AT THE TIME OF ENROLLMENT.
- 8 E. THE AVERAGE DOLLAR AMOUNT OF PREPROGRAM ARREARS
- 9 FOR TAP NEW ENROLLEES AT THE TIME OF ENROLLMENT.
- 10 F. THE NUMBER OF TAP BILLS ISSUED IN THAT MONTH.
- 11 G. THE DOLLARS OF TAP BILLS ISSUED IN THAT MONTH.
- 12 H. THE DOLLARS OF TAP CREDITS / DISCOUNTS (I.E., THE
- 13 DIFFERENCE BETWEEN THE TAP BILL AND BILLS AT
- 14 STANDARD RESIDENTIAL RATES) IN THAT MONTH.
- 15 I. THE NUMBER OF TAP PAYMENTS IN THAT MONTH.
- 16 J. THE DOLLARS OF TAP PAYMENTS IN THAT MONTH.
- 17 K. THE NUMBER OF TAP FULL AND ON-TIME PAYMENTS IN THAT
- 18 MONTH.
- 19 L. THE NUMBER OF TAP ACCOUNTS IN ARREARS IN THAT MONTH
- 20 (EXCLUDING ARREARS THAT ARE SOLELY PREPROGRAM
- 21 ARREARS).
- 22 M. THE DOLLARS OF ARREARS ON TAP ACCOUNTS IN THAT
- 23 MONTH (EXCLUDING ARREARS THAT ARE SOLELY
- 24 PREPROGRAM ARREARS).
- 25



1 N. THE NUMBER OF CUSTOMERS WHO EXITED TAP BY REASON  
2 FOR THE EXIT.  
3

4 **RESPONSE:**

5 The report attached as PA-III-26\_Response.xls is answer the questions posed by PA-III-26  
6 parts A through D, F through L, and M. Data for parts E and N are unavailable. Data are  
7 shown by calendar month as requested, from July 2017 through January 2022. A synopsis  
8 of data in each column is provided below.  
9

10 **Synopsis of Columns**

11 **(a) New TAP Enrollees**

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

17 **(b) Total TAP Participants**

18 The number of customers that were issued a TAP bill during the calendar month in  
19 question. Customers issued more than one TAP bill during a calendar month were counted  
20 once. Customers not issued a TAP bill during a calendar month were not counted for the  
21 month in question. Note that depending on a customer's billing cycle, a customer enrolled  
22 in one month (counted in (a) above) is included in this number in the month in which  
23 receive their first bill, which may not be the same month that customer is enrolled.  
24  
25

1           **(c) Number of TAP New Enrollees Having Preprogram Arrears at the Time of**  
2           **Enrollment**

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

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

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

11          **(f) Number of TAP Bills Issued**

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

15          **(g) Dollars of TAP Bills Issued**

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

17          **(h) Dollars of TAP Credits/Discounts**

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

20          **(i) Number of TAP Payments**

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

24          **(j) Dollars of TAP Payments**

25

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

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

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

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

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

- 10 • Number of Participants With TAP Balance Aged 0-30 days
- 11 • Number of Participants With TAP Balance Aged 31-60 days
- 12 • Number of Participants With TAP Balance Aged 61-90 days
- 13 • Number of Participants With TAP Balance Aged 91-120 days
- 14 • Number of Participants With TAP Balance Aged 121+ days

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

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

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

25 **(m) Dollars of TAP Balance Aged X-Y days**

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The total dollar amount of unpaid balances of TAP bills identified as described in part (l) 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.

1 **PA-III-27.** PLEASE PROVIDE BY MONTH SINCE JULY 2017 A DISTRIBUTION, IN  
2 BANDS OF \$50, OF PREPROGRAM ARREARS ON THE ACCOUNTS OF  
3 NEW TAP ENROLLEES.  
4

5 **RESPONSE:**

6 A spreadsheet entitled PA-III-27\_Response is included as attachment. This report shows  
7 the distribution of pre-program arrears for TAP enrollees at the time of their enrollment  
8 per month. Data are shown by calendar month as requested, for July 2017 through  
9 December 2019. "Pre-TAP arrears" is defined as the total account balance of a customer at  
10 the time of their enrollment in the TAP. Note that this excludes any balances that were in  
11 dispute or bankruptcy at the time of approval. The lower limit of an arrears band is  
12 inclusive, and the upper limit is exclusive. For instance, applications that are approved  
13 with a pre-TAP account balance of \$0.00 are counted in the \$0.00-\$50.00 band, and not in  
14 the \$-50.00-\$0.00 band.  
15

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

- 2 A. THE NUMBER OF NOTICES OF DISCONNECTION FOR  
3 NONPAYMENT ISSUED TO TAP PARTICIPANTS.  
4 B. THE NUMBER OF TAP PARTICIPANT ACCOUNTS THAT WERE  
5 DISCONNECTED FOR NONPAYMENT.  
6 C. THE NUMBER OF FINAL BILLS ISSUED TO TAP PARTICIPANT  
7 ACCOUNTS.  
8 D. THE NUMBER OF FINAL BILLS ISSUED TO TAP PARTICIPANT  
9 ACCOUNTS THAT HAD AN ARREARAGE ON THAT FINAL BILL.  
10 E. THE AGGREGATE DOLLAR VALUE OF ARREARAGES  
11 CONTAINED ON FINAL BILLS ISSUED TO TAP PARTICIPANT  
12 ACCOUNTS.  
13

14 **RESPONSE:**

15 Preparation of this response is in progress and will be provided in the future.  
16

17 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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- 1 **PA-III-29.** PLEASE PROVIDE A COPY OF ALL CURRENTLY EFFECTIVE:
- 2 A. TRAINING MANUALS PROVIDED TO PWD PERSONNEL
- 3 DESCRIBING THE TAP PROGRAM.
- 4 B. TRAINING MANUALS PROVIDED TO PWD PERSONNEL
- 5 INVOLVED WITH TAP INTAKE DESCRIBING THE INTAKE
- 6 PROCESS.
- 7 C. PROCEDURES MANUALS DESCRIBING THE TAP PROGRAM.
- 8 D. PROCEDURES MANUALS DESCRIBING THE TAP INTAKE
- 9 PROCESS.
- 10 E. TRAINING MATERIALS PROVIDED TO PWD PERSONNEL
- 11 INVOLVED WITH TAP INTAKE DESCRIBING THE TAP INTAKE
- 12 PROCESS.
- 13 F. TRAINING MATERIALS PROVIDED TO PERSONS OTHER THAN
- 14 PWD PERSONNEL WHICH PERSONS ARE OR MIGHT BE
- 15 INVOLVED WITH THE TAP INTAKE PROCESS.
- 16 G. OUTREACH MATERIALS PROVIDED TO PWD CUSTOMERS
- 17 DESCRIBING WHO IS QUALIFIED FOR AND/OR HOW TO ENROLL
- 18 IN TAP.
- 19 H. OUTREACH MATERIALS PROVIDED TO THE PUBLIC OTHER
- 20 THAN PWD CUSTOMERS DESCRIBING WHO IS QUALIFIED FOR
- 21 AND/OR HOW TO ENROLL IN TAP.
- 22
- 23
- 24
- 25

1 **RESPONSE:**

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

- 6 A. Raftelis has continued to provide training to PWD and WRB staff after the initial  
7 training provided at the time of program launch on 7/1/17. (Those materials are listed  
8 in PA-ADV-90, 2018  
9 [\[https://www.phila.gov/media/20180216112823/PWDPublicAdvocateADVSet1Respo  
11 nsesBVRFCWRB.pdf\]](https://www.phila.gov/media/20180216112823/PWDPublicAdvocateADVSet1Respon<br/>10 sesBVRFCWRB.pdf) and provided as attachments to the 2018 Rate Case  
12 proceedings [[https://www.phila.gov/departments/water-sewer-storm-water-rate-  
14 board/rate-proceedings/2018-proceeding/](https://www.phila.gov/departments/water-sewer-storm-water-rate-<br/>13 board/rate-proceedings/2018-proceeding/)].) Since July 2017, Raftelis has focused on  
15 trainings for the Customer Assistance Division following periodic updates to the  
16 Customer Assistance Management Program (CAMP) software and associated policy  
17 clarifications. Find training manuals provided for PWD personnel describing the TAP  
18 program in section (a) of the attachment Response\_Attachment\_PA-III-29.pdf. These  
19 sections contain the information presented during the Customer Assistance Division  
20 “Town Halls.” The group training sessions and their respective dates are listed below.  
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Date	Group	Pages
4/5/2018	Customer Assistance Division	1 – 16
5/8/2018	Customer Assistance Division	17 – 40
6/1/2018	Customer Assistance Division	41 – 43
6/26/2018	Customer Assistance Division	44 – 79
7/25/2018	Customer Assistance Division	80 – 117
8/28/2018	Customer Assistance Division	118 – 141
10/02/2018	Customer Assistance Division	142 – 155
11/6/2018	Customer Assistance Division	156 – 182
12/11/2018	Customer Assistance Division	183 – 222
1/15/2019	Customer Assistance Division	223 – 248
2/20/2019	Customer Assistance Division	249 – 265
3/26/2019	Customer Assistance Division	266 – 280
4/30/2019	Customer Assistance Division	281 – 297
6/25/2019	Customer Assistance Division	298 – 317
8/20/2019	Customer Assistance Division	318 – 332
10/17/2019	Customer Assistance Division	333 – 355
12/10/2019	Customer Assistance Division	356 – 371

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

1 that are most used by the Contact Center staff. The group training sessions and their  
2 respective dates are listed below.

Date	Group	Page
12/12/2018	Contact Center	372 – 383
1/16/2019	Contact Center	384 – 391
3/27/2019	Contact Center	392 – 402
4/30/2019	Contact Center	403 – 417
6/25/2019	Contact Center	418 – 433
8/20/2019	Contact Center	434 – 452
10/16/2019	Contact Center	453 – 466
12/10/2019	Contact Center	467 – 481
12/9/2019	Quick Reference Guide: Handling Application Requests	538 – 544
12/9/2019	Quick Reference Guide: Application Portal (IWFE)	545 – 550

17  
18 C. Section (c) of Response\_Attachment\_PA-III-29.pdf contains the Standard Operating  
19 Procedures document, which describes the TAP program and provides documentation  
20 about various aspects of the program in terms of reviewing applications, operating the  
21 CAMP software, and making decisions for CAP applications. Section (d) contains Quick  
22 Reference Guides that were produced to be easily referenced via CAMP software: they are  
23 available as PDFs that are displayed in the Help section of the software. They are updated  
24 with each software update.  
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Date	Title	Page
2/9/2019	Standard Operating Procedures	658 – 868
10/1/2019	Quick Reference Guide: Customer Assistance Programs at a Glance	526 – 529
12/9/2019	Quick Reference Guide: Application Lifecycle	530 – 533
10/1/2019	Quick Reference Guide: Basis2 Calls Related to TAP	534 – 537
12/9/2019	Quick Reference Guide: Handling Application Requests	538 – 544
12/9/2019	Quick Reference Guide: Application Portal (IWFE)	545 – 550
2/3/2020	Quick Reference Guide: Require and Optional Fields	551 – 554
2/3/2020	Quick Reference Guide: Stays of Enforcement	555 – 557
2/3/2020	Quick Reference Guide: Accepted Support Documentation	558 – 563
10/1/2019	Quick Reference Guide: Processing CAP Applications	564 – 567
10/1/2019	Quick Reference Guide: OOPA	568 – 571
12/9/2019	Quick Reference Guide: Incomplete Letters	572 – 578
10/1/2019	Quick Reference Guide: Debt Collection Records and CAP	579 – 581
10/1/2019	Quick Reference Guide: Approving Applications	582 – 588
10/1/2019	Quick Reference Guide: Denying Applications	589 – 593
2/3/2020	Quick Reference Guide: Customer Letters Tool	594 – 596
2/3/2020	Quick Reference Guide: Letters and Customer Communication	597 – 607
2/3/2020	Quick Reference Guide: Withdrawals and Opt Outs	608 – 611
2/3/2020	Quick Reference Guide: TAP Disputes	612 – 636
2/3/2020	Quick Reference Guide: Transfer Applications Tool	637 – 642
10/1/2019	Quick Reference Guide: CAMP Tools for Supervisors and Managers	643 – 647
10/1/2019	Quick Reference Guide: TAPBACK Payment Plan	648 – 649

1	Feb 2018	Quick Reference Guide: Explain a TAP Bill	650 - 657
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2

3 D. The manual describing the application intake process can be found in sections (d) and (e)

4 of Response\_Attachment\_PA-III-29.pdf. Section (c) contains the Standard Operating

5 Procedures document, which provides documentation about various aspects of the

6 program in terms of completing applications, reviewing applications, operating the CAMP

7 software, and making decisions for CAP applications. Section (d) contains Quick

8 Reference Guides that were produced to be easily referenced via the CAMP software: they

9 are available through the software. They are updated with each software update.

10	Date	Title	Page
11	2/9/2019	Standard Operating Procedures	658 – 868
12	10/1/2019	Quick Reference Guide: Customer Assistance Programs at a Glance	526 – 529
13	12/9/2019	Quick Reference Guide: Application Lifecycle	530 – 533
14	10/1/2019	Quick Reference Guide: Basis2 Calls Related to TAP	534 – 537
15	12/9/2019	Quick Reference Guide: Handing Application Requests	538 – 544
16	12/9/2019	Quick Reference Guide: Application Portal (IWFE)	545 – 550
17	2/3/2020	Quick Reference Guide: Require and Optional Fields	551 – 554
18	2/3/2020	Quick Reference Guide: Stays of Enforcement	555 – 557
19	2/3/2020	Quick Reference Guide: Accepted Support Documentation	558 – 563
20	10/1/2019	Quick Reference Guide: Processing CAP Applications	564 – 567
21	10/1/2019	Quick Reference Guide: OOPA	568 – 571
22	12/9/2019	Quick Reference Guide: Incomplete Letters	572 – 578
23	10/1/2019	Quick Reference Guide: Debt Collection Records and CAP	579 – 581
24	10/1/2019	Quick Reference Guide: Approving Applications	582 – 588
25			

1	10/1/2019	Quick Reference Guide: Denying Applications	589 – 593
2	2/3/2020	Quick Reference Guide: Customer Letters Tool	594 – 596
3	2/3/2020	Quick Reference Guide: Letters and Customer Communication	597 – 607
4	2/3/2020	Quick Reference Guide: Withdrawals and Opt Outs	608 – 611
5	2/3/2020	Quick Reference Guide: TAP Disputes	612 – 636
6	2/3/2020	Quick Reference Guide: Transfer Applications Tool	637 – 642
7	10/1/2019	Quick Reference Guide: CAMP Tools for Supervisors and	643 – 647
8		Managers	
9	10/1/2019	Quick Reference Guide: TAPBACK Payment Plan	648 – 649
10	Feb 2018	Quick Reference Guide: Explain a TAP Bill	650 - 657

11

12 E. Original training materials provided to PWD personnel involved with TAP intake

13 describing the TAP intake process can be found in sections (a), (b), (l), (o), and (r) of the

14 PA-ADV-90\_Attachment document for 2018 Rate Case

15 [\[https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-](https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-proceedings/2018-proceeding/)

16 [proceedings/2018-proceeding/](https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-proceedings/2018-proceeding/)]. These sections contain the training materials presented

17 during several training sessions at the launch of the program in 2017. Since then,

18 Customer Assistance Division and Contact Center staff have received periodic trainings,

19 as described in answers A and B above, to convey necessary information on program

20 policies and software functionalities. A training manual for onboarding new staff at the

21 Contact Center and Customer Assistance Division was periodically updated through 2018.

22 It can be found in section (c) of Response\_Attachment\_PA-III-29.pdf. Starting in 2019,

23 Quick Reference Guides double as training and reference materials for any new staff

24 joining these teams. The currently available Quick Reference Guides can be found in

25 section (d) of Response\_Attachment\_PA-III-29.pdf.

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Date	Title	Page
8/10/2018	WRB Training Manual v6	482 – 525
10/1/2019	Quick Reference Guide: Customer Assistance Programs at a Glance	526 – 529
12/9/2019	Quick Reference Guide: Application Lifecycle	530 – 533
10/1/2019	Quick Reference Guide: Basis2 Calls Related to TAP	534 – 537
12/9/2019	Quick Reference Guide: Handing Application Requests	538 – 544
12/9/2019	Quick Reference Guide: Application Portal (IWFE)	545 – 550
2/3/2020	Quick Reference Guide: Require and Optional Fields	551 – 554
2/3/2020	Quick Reference Guide: Stays of Enforcement	555 – 557
2/3/2020	Quick Reference Guide: Accepted Support Documentation	558 – 563
10/1/2019	Quick Reference Guide: Processing CAP Applications	564 – 567
10/1/2019	Quick Reference Guide: OOPA	568 – 571
12/9/2019	Quick Reference Guide: Incomplete Letters	572 – 578
10/1/2019	Quick Reference Guide: Debt Collection Records and CAP	579 – 581
10/1/2019	Quick Reference Guide: Approving Applications	582 – 588
10/1/2019	Quick Reference Guide: Denying Applications	589 – 593
2/3/2020	Quick Reference Guide: Customer Letters Tool	594 – 596
2/3/2020	Quick Reference Guide: Letters and Customer Communication	597 – 607
2/3/2020	Quick Reference Guide: Withdrawals and Opt Outs	608 – 611
2/3/2020	Quick Reference Guide: TAP Disputes	612 – 636
2/3/2020	Quick Reference Guide: Transfer Applications Tool	637 – 642
10/1/2019	Quick Reference Guide: CAMP Tools for Supervisors and Managers	643 – 647
10/1/2019	Quick Reference Guide: TAPBACK Payment Plan	648 – 649

1	Feb 2018	Quick Reference Guide: Explain a TAP Bill	650 - 657
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4 F. Original training materials provided to persons other than PWD personnel at the time of  
5 program launch can be found in section (q) of the PA-ADV-90\_ATTACHMENT  
6 document for 2018 Rate Case [[https://www.phila.gov/departments/water-sewer-storm-  
7 water-rate-board/rate-proceedings/2018-proceeding/](https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-proceedings/2018-proceeding/)]. This section contains the training  
8 materials presented during several training sessions for the Department’s partner  
9 organizations.

10  
11 G. Original outreach materials provided to PWD customers at the time of program launch  
12 describing who is qualified for and/or how to enroll in TAP can be found in section (s) of  
13 the PA-ADV-90\_Attachment document for 2018 Rate Case  
14 [[https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-  
15 proceedings/2018-proceeding/](https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-proceedings/2018-proceeding/)]. This section contains examples of various types of  
16 publications generated for and sent to PWD customers. These examples explain general  
17 details of the program and provide information on how to apply for assistance.

18  
19 Outreach materials that have been produced since 2018 include an updated customer  
20 assistance application. The updates were based on feedback from Residential Customer  
21 Assistance and Services (RCAS) stakeholder group as well as observational studies of  
22 customers’ experience with the earlier version of the application conducted by PWD  
23 Public Affairs. The updated application (v5.0) can be found in section (f) of  
24 Response\_Attachment\_PA-III-29.pdf.  
25

1 The PWD Public Affairs created outreach materials for the Senior Citizen Discount  
2 recipient campaign, which focused on current recipients of the Senior Citizen Discount  
3 (SCD) who had not applied for TAP as of spring 2019. PWD Public Affairs created bill  
4 stuffers to inform customers about TAP at the end of moratorium periods in 2018 and  
5 2019. SCD campaign materials and bill stuffers are included in section (g) of  
6 Response\_Attachment\_PA-III-29.pdf.

Date	Description	Page
5/1/2019	Updated application (version 5.0)	869 – 876
May 2019	Senior Citizen Discount participant campaign direct-mail cover letter	877
11/25/2019	Senior Citizen Discount participant campaign mailer	878
10/2019	Social Media: Utility Fair	879
10/2019	Robo Phonecall: Utility Fair Cobbs Creek	n/a
3/2018 -4/2018	Billstuffer: 2018 End of Moratorium / Prevent Shutoffs	880 – 881
3/2019 -4/2019	Billstuffer: 2019 End of Moratorium / Prevent Shutoffs	882 – 883

17  
18  
19 H. Original outreach materials provided to the public other than PWD customers describing  
20 who is qualified for and/or how to enroll in TAP can be found in section t of the PA-  
21 ADV-90\_Attachment document for 2018 Rate Case  
22 [\[https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-](https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-proceedings/2018-proceeding/)  
23 [proceedings/2018-proceeding/](https://www.phila.gov/departments/water-sewer-storm-water-rate-board/rate-proceedings/2018-proceeding/)]. This section contains images of advertising placed at  
24 subway stations, bus stops, on bus exteriors, as well as the interior of subways.  
25



1 Additionally, the Department has performed outreach to inform Philadelphia residents  
2 about TAP, including at community presentations and Utility Fairs. Outreach materials for  
3 various events are included in section (h) of Response\_Attachment\_PA-III-29.pdf. The list  
4 of outreach events that have been conducted through 12/31/19 are also included in that  
5 section.

Date	Description	Page
11/2018 - present	Presentation Slides: How to enroll	884 – 887
10/2018- present	Presentation Slide: general	888
9/2017-present	Tabling Flyer: New Ways to get help with your water bill	889
1/2018-present	Tear-away Tabling Flyer: Get help with your water bill (English and Spanish)	890 – 891
3/2019-present	Fact Sheet: Tenant to TAP	892
6/2019-present	Pamphlet: Block Captain Guide	893
10/2019	Outdoor Signage: Utility Fair Cobbs Creek	894
11/2019	Outdoor Signage: Utility Fair West Philly	895
2/2019 – 3/2019	Flyer (Spanish): Utility Fair Kensington	896
6/15/2017 – 12/31/2019	List of Customer Assistance Programs and Tiered Assistance Program outreach events	897 – 899

21 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-30.** PLEASE PROVIDE COPIES OF ALL INTERNAL DATA REPORTS  
2 ROUTINELY PERIODICALLY (E.G., WEEKLY, MONTHLY, BI-MONTHLY)  
3 GENERATED REGARDING THE OPERATION OF TAP SINCE JULY 1, 2017.  
4

5 **RESPONSE:**

6 Daily, weekly, and quarterly reports are provided as PA-III-30\_Response.xls.  
7

8 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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- 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

1 **PA-III-32.** PLEASE PROVIDE A COPY OF ALL THIRD PARTY CONTRACTS WITH  
2 AN ENTITY OUTSIDE PWD:

3 A. REGARDING INFORMATION TECHNOLOGY DEVOTED  
4 EXCLUSIVELY TO TAP.

5 B. REGARDING OUTREACH DEVOTED EXCLUSIVELY TO TAP.

6 C. REGARDING INTAKE DEVOTED EXCLUSIVELY TO TAP.  
7

8 **RESPONSE:**

9 PWD has issued a notice of intent to contract with Energy Coordinating Agency of  
10 Philadelphia, Inc. for administration and implementation assistance for the Tiered  
11 Assistance Program. The notice is posted on the City's eContract website, which is  
12 available at: <https://secure.phila.gov/eContract/>. The contract is currently being  
13 negotiated.  
14

15 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-III-33.** PLEASE PROVIDE THE AVERAGE NUMBER OF RESIDENTIAL  
2 DISCONNECTIONS FOR NONPAYMENT PER DAY PER INDIVIDUAL  
3 FIELD PERSONNEL DOING DISCONNECTIONS FOR NONPAYMENT. IF  
4 SUCH AVERAGE DIFFERS BY MONTH OR BY SEASON OF THE YEAR,  
5 SEPARATELY PROVIDE THE DIFFERENT NUMBERS ALONG WITH AN  
6 IDENTIFICATION OF WHICH MONTH OR SEASON THE NUMBER  
7 RELATES TO.  
8

9 **RESPONSE:**

10 Please note there are no reports available that capture this data.  
11

12 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau and Donna  
13 Schwartz, Philadelphia Water Department  
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**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

1 **PA-III-35.** PLEASE PROVIDE THE AVERAGE TIME (IN MINUTES OR IN  
2 INCREMENTS OF AN HOUR) THAT IT TAKES A STAFFPERSON TO  
3 PERFORM A RESIDENTIAL DISCONNECTION OF SERVICE FOR  
4 NONPAYMENT.  
5

6 **RESPONSE:**

7 The normal shut-off time at a property is approximately 10 minutes when the Field  
8 Service Representative (FSR) is at a property. This estimate excludes travel and  
9 administrative time. Also, if the curb box is obstructed or not visible upon initial  
10 inspection the FSR is required to spend up to 30 minutes to locate and or clear an  
11 obstruction.  
12

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

- 3 A. THE PERCENT OF A TYPICAL DAY SPENT ON PERFORMING  
4 DISCONNECTIONS FOR NONPAYMENT;  
5 B. THE PERCENT OF A TYPICAL WEEK SPENT ON PERFORMING  
6 DISCONNECTIONS FOR NONPAYMENT;  
7 C. THE PERCENT OF A TYPICAL MONTH SPENT ON PERFORMING  
8 DISCONNECTIONS FOR NONPAYMENT.

9  
10 IF THIS DATA DIFFERS BY MONTH OR SEASON, INDICATE THE  
11 DIFFERENCES AND THEN IDENTIFY THE MONTH OR SEASON TO  
12 WHICH THE DIFFERENCE APPLY.

13  
14 **RESPONSE:**

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

- 17 (i) Shut offs for delinquency,  
18 (ii) Restores for delinquency after the customer makes payment arrangements,  
19 (iii) Issuing curb stop violations, and  
20 (iv) Correcting curb stop violations in order to shut off service to the property.

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

23  
24 Please note that the data differs between shut off season and the moratorium. Moratorium  
25 runs from December 1st of each year until April 1st of the following year. During the



1 moratorium we only shut off commercial accounts and correct plumbing violations to  
2 residential accounts in anticipation of shutting off service once the moratorium is lifted.  
3

4 **RESPONSE PROVIDED BY:** Donna Schwartz, Philadelphia Water Department  
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1 **PA-III-37.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE RATEMAKING  
2 TREATMENT OF LATE FEE REVENUE. SEPARATELY EXPLAIN HOW  
3 LATE FEE REVENUE IS APPORTIONED BETWEEN CUSTOMER CLASSES;  
4

5 **RESPONSE:**

6 Late fee revenues are net from the system operating expenses (see Line 10 of Tables W-10  
7 and WW-10, PWD Statement 7A, Schedule BV-1).  
8

9 The Department does not have customer classes. Additionally, the General Bond  
10 Ordinance defines “System” as the entire combined water system and wastewater system  
11 of the City (PWD Statement No. 2, Schedule ML-3, Bond Counsel Memorandum). As  
12 such, the Department’s late fee revenues are reported in total.  
13

14 **RESPONSE PROVIDED BY:** Melissa La Buda, Philadelphia Water Department and Black &  
15 Veatch Management Consulting, LLC.  
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- 1 **PA-III-38.** FOR EACH OF THE THREE MOST RECENTLY COMPLETED FISCAL  
2 YEARS, AS WELL AS FOR THE CURRENT FISCAL YEAR TO DATE,  
3 PLEASE PROVIDE A COPY OF ALL BUDGET DOCUMENTS  
4 SPECIFICALLY IDENTIFYING COLLECTION ACTIVITIES AS A  
5 SEPARATELY STATED LINE-ITEM.
- 6 A. FOR THE CURRENT FISCAL YEAR, PROVIDE THOSE BUDGET  
7 DOCUMENTS INDICATING THE BUDGETED EXPENDITURES  
8 YEAR-TO-DATE;
- 9 B. FOR THE THREE MOST RECENTLY COMPLETED FISCAL YEARS,  
10 PROVIDE A COPY OF ALL BUDGET DOCUMENTS REPORTING  
11 ACTUAL EXPENDITURES FOR THE BUDGET YEAR;
- 12 C. FOR THE CURRENT FISCAL YEAR, PROVIDE THOSE BUDGET  
13 DOCUMENTS INDICATING ACTUAL EXPENDITURES FOR THE  
14 BUDGET YEAR;
- 15 D. IF AVAILABLE, FOR DOCUMENT SHOWING ACTUAL  
16 EXPENDITURES, PROVIDE DOCUMENTS THAT SHOW SIDE-BY-  
17 SIDE COMPARISONS OF BUDGETED EXPENDITURES VS.  
18 ACTUAL EXPENDITURES.

19  
20 **RESPONSE:**

21 Please see response attachment PA-III-38.  
22

23 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-39.** STATE THE TOTAL BUDGETED COLLECTION COSTS FOR EACH FISCAL  
2 YEAR 2018 TO CURRENT INCLUSIVE, SEPARATED BY RESIDENTIAL  
3 AND NON-RESIDENTIAL ACCOUNTS, ASSOCIATED WITH HANDLING  
4 DELINQUENT ACCOUNTS, EXCLUDING ADMINISTRATIVE AND  
5 OVERHEAD EXPENSES.  
6

7 **RESPONSE:**

8 We do not base our collection efforts on residential vs non-residential categories and  
9 therefore cannot provide the requested information.  
10

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

6  
7 **RESPONSE:**

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

10  
11 **RESPONSE PROVIDED BY:** Melissa La Buda, Philadelphia Water Department and Michelle  
12 L. Bethel-Miller, Water Revenue Bureau

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1 **PA-III-41.** PLEASE PROVIDE AN EXPLANATION AND A DETAILED DESCRIPTION  
2 OF HOW RESIDENTIAL LATE FEES ARE ALLOCATED IN THE PWD  
3 COST-OF-SERVICE STUDY.  
4

5 **RESPONSE:**

6 Please response to PA-III-37.  
7

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

10  
11 **RESPONSE:**

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

15  
16 **RESPONSE PROVIDED BY:** Donna Schwartz, Philadelphia Water Department  
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1 **PA-III-43.** PLEASE PROVIDE ANY DOCUMENTS, ANALYSES OR REPORTS WHICH  
2 COULD BE USED TO DETERMINE THE FIELD STAFF CAPACITY (I.E.,  
3 FULL-TIME EQUIVALENTS) NEEDED TO PERFORM ALL THE  
4 RESIDENTIAL SERVICE DISCONNECTIONS FOR NONPAYMENT  
5 SCHEDULED:

- 6 A. BY WEEK;
- 7 B. BY MONTH; AND
- 8 C. BY YEAR.

9  
10 **RESPONSE:**

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

13  
14 **RESPONSE PROVIDED BY:** Donna Schwartz, Philadelphia Water Department  
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1 **PA-III-44.** PLEASE IDENTIFY ANY DOCUMENTS, ANALYSES OR REPORTS THAT  
2 ADDRESS, CONCERN OR REFERS TO THE SCHEDULING OR  
3 APPOINTING OF STAFF TO PERFORM RESIDENTIAL SERVICE  
4 DISCONNECTIONS FOR NONPAYMENT DURING THE PEAK MONTHS OF  
5 RESIDENTIAL SHUTOFFS.

6  
7 **RESPONSE:**

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

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11 **RESPONSE PROVIDED BY:** Donna Schwartz, Philadelphia Water Department  
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- 1 **PA-III-45.** PLEASE IDENTIFY ANY DOCUMENTS, ANALYSES OR REPORTS  
2 PREPARED, MODIFIED OR USED SINCE JANUARY 2018, THAT  
3 ADDRESSES, CONCERNS OR REFERS TO:
- 4 A. CHANGES IN COLLECTION PROCEDURES DURING THE MONTHS  
5 OF PEAK SERVICE DISCONNECTIONS;
  - 6 B. CHANGES IN THE DECISION RULE ON WHETHER AND/OR WHEN  
7 TO PERFORM CERTAIN COLLECTION ACTIVITIES DURING THE  
8 MONTHS OF PEAK SERVICE DISCONNECTIONS;
  - 9 C. CHANGES IN COLLECTION PRACTICES OR PROCEDURES OF  
10 ANY SORT THAT ARE ADOPTED DURING THE MONTHS OF PEAK  
11 SERVICE DISCONNECTION.
  - 12 D. CHANGES IN STAFFING LEVELS OR STAFFING SCHEDULING  
13 DURING THE MONTHS OF PEAK SERVICE DISCONNECTIONS.

14  
15 **RESPONSE:**

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

18  
19 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-46.** PLEASE PROVIDE A COPY OF ANY AND ALL LABOR AGREEMENTS  
2 AFFECTING PWD THAT INCLUDE ANY REFERENCE TO THE  
3 DISCONNECTION OF SERVICE FOR NONPAYMENT.  
4

5 **RESPONSE:**

6 The Collective Bargaining Agreements and subsequent amendments do not reference the  
7 issue of service disconnects.  
8

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

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

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

12  
13 IF MONTHLY BUDGETS AND/OR FINANCIAL REPORTS ARE NOT  
14 AVAILABLE, PROVIDE WHAT IS AVAILABLE (E.G., ANNUAL,  
15 QUARTERLY) USING THE MOST COMMONLY-GENERATED REPORT  
16 (E.G., MONTHLY OVER QUARTERLY, QUARTERLY OVER ANNUAL,  
17 ETC.).

18  
19 **RESPONSE:**

20 The Home Rule Charter makes collections a function of the Water Revenue Bureau.  
21

22 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
23  
24  
25

1 **PA-III-48.** PLEASE EXPLAIN AND DESCRIBE IN DETAIL THE JOB DESCRIPTION  
2 FOR EACH EMPLOYEE WHOSE REASONABLY EXPECTED TYPICAL  
3 DUTIES WOULD INCLUDE THE PROCESS OF DISCONNECTING SERVICE  
4 FOR NONPAYMENT. PLEASE INCLUDE ANY DOCUMENTS, ANALYSES  
5 OR REPORTS THAT ADDRESS, CONCERN OR REFER TO THE JOB  
6 DESCRIPTION.

7  
8 **RESPONSE:**

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

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

- 3 A. RESIDENTIAL DISCONNECTIONS FOR NONPAYMENT.  
4 B. THE NUMBER OF ACCOUNTS RECONNECTED SUBSEQUENT TO  
5 A DISCONNECTION FOR NONPAYMENT.  
6 C. THE AVERAGE TIME BETWEEN DISCONNECTION AND  
7 RECONNECTION.  
8

9 **RESPONSE:**

10 See response attachment PA-III-49 Disconnection and Reconnection Report. Please note  
11 there are no reports available that capture data for “(C) the average time between  
12 disconnection and reconnection.”  
13

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

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

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

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

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

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

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



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**RESPONSE:**

See response to PA-III-9.

**RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau

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

9  
10 **RESPONSE:**

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

12  
13 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-52.** SEPARATELY PROVIDE THIS SAME DATA REQUESTED IN PA-III-51 FOR  
2 TAP PARTICIPANTS (EXCLUDING PREPROGRAM ARREARS).  
3

4 **RESPONSE:**

5 Preparation of this response is in progress and will be provided in the future.  
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7 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-53.** PLEASE PROVIDE ALL WRITTEN STUDIES CURRENTLY WITHIN THE  
2 CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED BY OR  
3 FOR PWD, THAT EXPLICITLY ASSESS THE RELATIONSHIP BETWEEN  
4 THE NUMBER OF, OR RATE AT WHICH, THE PWD ISSUES DISCONNECT  
5 NOTICES AND THE REDUCTION OF RESIDENTIAL BAD DEBT.  
6

7 **RESPONSE:**

8 There are no documents, analyses, or reports available that capture the information  
9 requested.  
10

11 **RESPONSE PROVIDED BY:** Melissa LaBuda, Philadelphia Water Department  
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**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

1 **PA-III-55.** PLEASE PROVIDE A COPY OF ALL REPORTS, EVALUATIONS, MEMOS,  
2 ANALYSES OR OTHER WRITTEN DOCUMENTS OF ANY NATURE  
3 CONTAINING THE PWD METHODOLOGY, PROCEDURE OR PROCESS  
4 DESIGNED TO SYSTEMATICALLY REVIEW, STUDY OR ASSESS THE  
5 PWD RESIDENTIAL BILLING AND/OR PAYMENT RECORDS IN AN  
6 EFFORT TO:

- 7 A. CHARACTERIZE PATTERNS OF NONPAYMENT;  
8 B. IDENTIFY THE CHARACTERISTICS OF NONPAYERS;  
9 C. IDENTIFY PREDICTORS OF NONPAYMENT;  
10 D. IDENTIFY STRATEGIES TO REDUCE NONPAYMENT;  
11 E. IDENTIFY EARLY INDICATORS OF NONPAYMENT.

12  
13 **RESPONSE:**

14 Raftelis has produced two reports that related to section (a) of this question. The FY 2019  
15 Payment Patterns Report, originally provided in Raftelis' direct testimony as Schedule  
16 RFC-6 and provided again as PA-III-3\_Response\_AB.xls, and the FY 2019 Low Income  
17 Billing & Payments Report, originally provided in Raftelis' direct testimony as Schedule  
18 RFC-9, and provided again as PA-III-3\_Response\_C.xls.

19  
20 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-56.** PLEASE PROVIDE EACH CUSTOMER DEMOGRAPHIC SURVEY THAT  
2 HAS BEEN PREPARED FOR RESIDENTIAL CUSTOMERS SINCE  
3 JANUARY 2015. IF NO SURVEY HAS BEEN PREPARED SINCE JANUARY  
4 2015, PLEASE PROVIDE THE MOST RECENT SURVEY.  
5

6 **RESPONSE:**

7 Please see response attachment PA-III-56.  
8

9 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-III-57.** BY MONTH FOR THE MONTHS JULY 2017 TO PRESENT, PLEASE

2 PROVIDE FOR RESIDENTIAL CUSTOMERS:

- 3 A. THE NUMBER OF CUSTOMERS;  
4 B. THE NUMBER OF BILLS RENDERED;  
5 C. THE DOLLARS BILLED FOR CURRENT SERVICE;  
6 D. THE NUMBER OF PAYMENTS RECEIVED;  
7 E. THE DOLLARS OF PAYMENT RECEIVED.

8  
9 86. Provide that same data requested in PA-III-57 for TAP participants.

10  
11 87. Please identify any clusters of English as a Second Language (“ESL”)  
12 customers that exist in the PWD service territory by community, zip code,  
13 Census Tract, or other geographic region or area by which ESL is tracked.  
14 Separately provide a detailed explanation of how clusters of ESL customers  
15 are identified.

16 **RESPONSE:**

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

19  
20 Please see responses to PA-III-105 and PA-III-106 for responses to Items # 86 and 87,  
21 respectively, referenced in the data request.

22  
23 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-58.** PLEASE PROVIDE A DETAILED DESCRIPTION OF:

- 2 A. THE TRANSLATION SERVICES AVAILABLE WHEN A PERSON  
3 CONTACTS PWD THROUGH AN AUTOMATED OR INTERACTIVE  
4 TELEPHONE SYSTEM.
- 5 B. THE TRANSLATION SERVICES AVAILABLE WHEN A PERSON  
6 CONTACTS PWD THROUGH A HUMAN INTERACTION.
- 7 C. THE TRANSLATION SERVICES AVAILABLE WHEN A PERSON  
8 CONTACTS PWD THROUGH A WEB-BASED SYSTEM.
- 9 D. HOW A PERSON ACCESSES THE TRANSLATION SERVICE WHEN  
10 A PERSON CONTACTS PWD THROUGH AN AUTOMATED OR  
11 INTERACTIVE TELEPHONE SYSTEM.
- 12 E. HOW A PERSON ACCESSES THE TRANSLATION SERVICE WHEN  
13 A PERSON CONTACTS PWD THROUGH A HUMAN INTERACTION.
- 14 F. HOW A PERSON ACCESSES THE TRANSLATIONS SERVICE WHEN  
15 A PERSON CONTACTS PWD THROUGH A WEB-BASED SYSTEM.

16  
17 **RESPONSE:**

18 Please see response attachment PA-III-58.

19  
20 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-III-59.** PLEASE PROVIDE A DETAILED DESCRIPTION OF HOW TRANSLATIONS  
2 OF WRITTEN DOCUMENTS PROVIDED TO CUSTOMERS ARE PROVIDED  
3 FOR:

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

8  
9 INCLUDED WITHIN THESE EXPLANATIONS, PROVIDE A DETAILED  
10 EXPLANATION OF THE LANGUAGES PROVIDED, HOW THE CHOICE OF  
11 LANGUAGES IS MADE, AND HOW THE WRITTEN DOCUMENTS IN  
12 DIFFERENT LANGUAGES ARE DISTRIBUTED.

13  
14 **RESPONSE:**

15 Please see response attachment PA-III-59.

16  
17 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau and Raftelis  
18 Financial Consultants, Inc.

1 **PA-III-60.** BY MONTH FOR JULY 2017 THROUGH PRESENT, PLEASE PROVIDE THE  
2 NUMBER OF TAP ENROLLEES WHOSE INCOME INFORMATION WAS  
3 ACCEPTED FOR ENROLLMENT IN TAP DUE TO THE AUTOMATIC  
4 ACCEPTANCE OF INCOME PROVISIONS OF PHILADELPHIA CODE §19-  
5 1605(3)(I)(.2) (REQUIRING ACCEPTANCE OF DETERMINATIONS OF  
6 INCOME AND RESIDENCY).

7  
8 **RESPONSE:**

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

15

Year	Month	OOPA Approved for TAP
2018	4	1
2018	5	28
2018	6	35
2018	7	14
2018	8	43
2018	9	26
2018	10	60
2018	11	87
2018	12	78

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2019	1	158
2019	2	131
2019	3	151
2019	4	131
2019	5	72
2019	6	75
2019	7	81
2019	8	61
2019	9	68
2019	10	81
2019	11	62
2019	12	56

**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-III-61.** BY MONTH FOR JULY 2017 THROUGH PRESENT, PLEASE PROVIDE THE  
2 NUMBER OF TAP ENROLLEES WHOSE RESIDENCY INFORMATION WAS  
3 ACCEPTED FOR ENROLLMENT IN TAP DUE TO THE AUTOMATIC  
4 ACCEPTANCE OF RESIDENCY PROVISIONS OF PHILADELPHIA CODE  
5 §19-1605(3)(I).(2) (REQUIRING ACCEPTANCE OF DETERMINATIONS OF  
6 INCOME AND RESIDENCY).

7  
8 **RESPONSE:**

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

15

Year	Month	OOPA Approved for TAP
2018	4	1
2018	5	28
2018	6	35
2018	7	14
2018	8	43
2018	9	26
2018	10	60
2018	11	87
2018	12	78

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2019	1	158
2019	2	131
2019	3	151
2019	4	131
2019	5	72
2019	6	75
2019	7	81
2019	8	61
2019	9	68
2019	10	81
2019	11	62
2019	12	56

**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-III-62.** PLEASE IDENTIFY AND PROVIDE A DETAILED DESCRIPTION OF THE  
2 MUNICIPAL OFFICE THAT DETERMINES INCOME-ELIGIBILITY FOR  
3 THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM.  
4

5 **RESPONSE:**

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

9  
10 The Department of Revenue’s Tax Credit and Assistance Programs Unit processes  
11 applications for low-income taxpayer installment payment agreements.  
12

13 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller and RaVonne Muhammad, Water  
14 Revenue Bureau  
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1 **PA-III-63.** PLEASE PROVIDE A COPY OF ALL WRITTEN CORRESPONDENCE,  
2 INCLUDING E-MAILS, LETTERS, MEMOS OR OTHER WRITTEN  
3 DOCUMENT OF ANY NATURE, BETWEEN PWD AND/OR WRB AND THE  
4 MUNICIPAL OFFICE THAT DETERMINES INCOME-ELIGIBILITY FOR  
5 THE PHILADELPHIA TAX HARDSHIP PROGRAM THAT PROPOSES,  
6 CONSIDERS, EVALUATES OR OTHERWISE DISCUSSES A POTENTIAL  
7 COLLABORATION BETWEEN THE TAP AND TAX HARDSHIP  
8 ASSISTANCE PROGRAM WITH RESPECT TO DETERMINING INCOME  
9 ELIGIBILITY FOR THE TWO PROGRAMS.

10  
11 **RESPONSE:**

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

14  
15 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller and RaVonne Muhammad, Water  
16 Revenue Bureau

1 **PA-III-64.** PLEASE COMPARE AND CONTRAST THE INCOME-ELIGIBILITY FOR  
2 THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM AND TAP.  
3

4 **RESPONSE:**

5 See response to PA-III-62.

6 Also, please refer to The Philadelphia Code sections 19-1305 and 19-1605 (available here:  
7 <http://bit.ly/1OAAaRK2>), Philadelphia Water Department Regulations section 206.0 et seq.  
8 (available here: <http://www.phila.gov/water/PDF/PWDregCH2.pdf>) and the Department  
9 of Revenue Real Estate Tax Regulations For City Of Philadelphia And School District Of  
10 Philadelphia section 302 et seq. (available here: [https://beta.phila.gov/documents/owner-  
11 occupied-payment-agreement-oopa-regulations/](https://beta.phila.gov/documents/owner-occupied-payment-agreement-oopa-regulations/)).  
12

13 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller and RaVonne Muhammad, Water  
14 Revenue Bureau  
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1 **PA-III-65.** PLEASE PROVIDE A DETAILED DESCRIPTION OF ANY PROCESS, ALL  
2 PROCESSES, THROUGH WHICH:

3 A. ACTIVE WRAP PARTICIPANTS ARE CROSS-CHECKED AGAINST  
4 THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM TO  
5 DETERMINE INCOME-ELIGIBILITY FOR TAP;

6 B. DEFAULTED WRAP PARTICIPANTS ARE CROSS-CHECKED  
7 AGAINST THE PHILADELPHIA TAX HARDSHIP ASSISTANCE  
8 PROGRAM TO DETERMINE INCOME-ELIGIBILITY FOR TAP;

9 C. TAP APPLICANTS, IRRESPECTIVE OF THEIR CURRENT OR  
10 FORMER STATUS AS A WRAP PARTICIPANT, ARE CROSS-  
11 CHECKED AGAINST THE PHILADELPHIA TAX HARDSHIP  
12 ASSISTANCE PROGRAM TO DETERMINE THEIR INCOME-  
13 ELIGIBILITY FOR TAP

14  
15 **RESPONSE:**

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

21  
22 The Customer Assistance Management Program (CAMP), the application workflow and  
23 reporting software, receives daily updates of current OOPA approvals. The Customer  
24 Assistance Division staff use OOPA determinations of income and residency to complete  
25

1 the review of the customer assistance application, if customers have been approved for  
2 OOPA during the 12 months preceding receipt of their application.  
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4 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-66.** PLEASE IDENTIFY WHICH DATE TAP PARTICIPANTS ARE DEFINED TO  
2 BEGIN THEIR PARTICIPATION IN TAP: (1) THE DATE ON WHICH  
3 APPLICANTS SUBMIT A TAP APPLICATION; (2) THE DATE ON WHICH  
4 APPLICANTS ARE FOUND TO BE ELIGIBLE FOR TAP; OR (3) SOME  
5 OTHER DATE (PLEASE IDENTIFY WITH SPECIFICITY WHAT “OTHER”  
6 DATE IS USED).

7  
8 **RESPONSE:**

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

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17 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**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.

1 **PA-III-68.** FOR TAP PARTICIPANTS WHO EXPERIENCE A TIME LAG BETWEEN  
2 THE DATE ON WHICH THEY SUBMIT A TAP APPLICATION AND THE  
3 DATE ON WHICH THEY ARE ENROLLED IN TAP, PLEASE PROVIDE A  
4 DETAILED DESCRIPTION OF WHAT BILLS SUCH APPLICANTS RECEIVE  
5 DURING THE TIME AFTER THEY SUBMIT A TAP APPLICATION AND  
6 BEFORE THEY ARE ENROLLED IN TAP.

7  
8 **RESPONSE:**

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

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14 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-69.** BY WEEK, SINCE JULY 1, 2017, PROVIDE THE NUMBER OF TAP  
2 ENROLLEES BY HOMEOWNER/TENANT STATUS.  
3

4 **RESPONSE:**

5 The number of TAP enrollees by homeowner/tenant status, by week, is provided in PA-  
6 III-69\_Attachment.xls.  
7

8 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**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

1 **PA-III-71.** PLEASE IDENTIFY THE SPECIFIC DOLLAR AMOUNT OF TAP  
2 ADMINISTRATIVE COSTS CURRENTLY BEING COLLECTED IN PWD  
3 BASE RATES AS OF JULY 2017, DISAGGREGATED BY:  
4 A. WAGES;  
5 B. BENEFITS;  
6 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);  
7 D. INFORMATION TECHNOLOGY;  
8 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS  
9 CALCULATED);  
10 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE “OTHER”  
11 IS).

12  
13 **RESPONSE:**

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

17  
18 Please refer to Response Attachment PA-III-71 to 72.xlsx for further information  
19 regarding administrative costs.

20  
21 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Black & Veatch  
22 Management Consulting, LLC

1 **PA-III-72.** PLEASE IDENTIFY, BY MONTH SINCE JULY 2017, THE ACTUAL  
2 DOLLAR AMOUNT OF ADMINISTRATIVE COSTS EXPENDED ON TAP  
3 SINCE JULY 1, 2017, DISAGGREGATED BY:  
4 A. WAGES;  
5 B. BENEFITS;  
6 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);  
7 D. INFORMATION TECHNOLOGY;  
8 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS  
9 CALCULATED);  
10 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE “OTHER”  
11 IS).

12  
13 **RESPONSE:**

14 Please see to Response Attachment PA-III-71 to 72.xlsx.  
15

16 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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**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

1 **PA-III-74.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE DOLLAR  
2 AMOUNT BY WHICH THE 25% “CONTINGENCY” FOR TAP  
3 ADMINISTRATIVE COSTS CURRENTLY BEING COLLECTED IN PWD  
4 RATES WAS ACCESSED BY MONTH FOR EACH MONTH JULY 2017 TO  
5 PRESENT.

6 A. IDENTIFY WITH SPECIFICITY THE COMPONENT(S) OF TAP  
7 ADMINISTRATIVE WHICH HAVE CAUSED THE NEED TO DRAW  
8 UPON THE 25% CONTINGENCY FOR TAP ADMINISTRATIVE  
9 COSTS.

10  
11 **RESPONSE:**

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

16  
17 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-III-75.** PLEASE PROVIDE THE GROSS UNCOLLECTIBLES FOR TAP  
2 PARTICIPANTS BY YEAR FOR FISCAL YEARS 2018 TO PRESENT  
3 INCLUSIVE.  
4

5 **RESPONSE:**

6 Please note there are no reports available that capture the gross uncollectibles for TAP  
7 participants. Additionally, the term “gross uncollectibles” is vague and undefined in the  
8 discovery request.  
9

10 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-76.** PLEASE PROVIDE THE NET UNCOLLECTIBLES FOR WRAP  
2 PARTICIPANTS BY YEAR FOR THE FISCAL YEARS 2018 TO PRESENT  
3 INCLUSIVE.  
4

5 **RESPONSE:**

6 Please note there are no reports available that capture the net uncollectibles for WRAP  
7 participants. Additionally, the term “net uncollectibles” is vague and undefined in the  
8 discovery request.  
9

10 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-77.** PLEASE PROVIDE PAYMENT PATTERN REPORTS BY MONTH FOR JULY  
2 2017 TO PRESENT LIMITED TO TAP PARTICIPANTS.  
3

4 **RESPONSE:**

5 The FY 2019 Low Income Billing & Payments Report provides payment pattern  
6 information for TAP participants. This report was originally provided in Raftelis' direct  
7 testimony as Schedule RFC-9, and is provided again as PA-III-3\_Response\_C.xls.  
8 Monthly data are provided in the raw data tab, "rpt\_libp\_v2019\_03\_FY19\_20190710."  
9

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

2 A. BILLINGS

3 B. PAYMENTS

4 C. TOTAL PERCENT COLLECTED

5  
6 **RESPONSE:**

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

10  
11 Billings are defined as service and usage charge transaction types from the basis2  
12 cis\_transactions table, with creation dates during the fiscal year in question. Billings do  
13 include all City accounts except those designated as PWD accounts; they include only  
14 retail customers, excluding any wholesale customers. Total billings are split between Non-  
15 Stormwater Only (Non-SWO) and Stormwater Only (SWO) accounts based on the  
16 account's installation designation contained in the basis2 cis\_installations table.

17  
18 Payments for accounts other than City accounts are defined as receipt or transfer credits  
19 allocated to Billings (see definition above). Payments are reported only when they link to  
20 specific Billings transactions reported for the fiscal year in question. Payments in the  
21 'Billing Year' are those that were received by the end of the fiscal year in which they were  
22 billed. Payments in 'Billing year +1' are those that were received during the subsequent  
23 fiscal year. Payments in 'Billing year +2 and beyond' are those that were received any  
24 time after the subsequent fiscal year. Payments are dated based on their Allocation Date in  
25 the basis2 cis\_crdr\_allocations table.

1 Total percent collected is calculated as the Total Payments (see definition above) for the  
2 time period of interest (Billing Year, Billing Year + 1, or Billing Year + 2 and Beyond)  
3 divided by the Total Billings (see definition above) for the fiscal year of interest.  
4

5 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-79.** IN ASSESSING COLLECTIONS FOR PWD, PLEASE:

2 A. DEFINE THE TERM “RECEIPTS”

3 B. SEPARATELY INDICATE HOW THE DISTINCTION BETWEEN  
4 “BILLINGS” AND “RECEIPTS” IS USED IN CALCULATING RATE LEVELS.

5  
6 **RESPONSE:**

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

- 8 • In the context of retail revenues, receipts refer to the cumulative anticipated actual  
9 revenues in each fiscal year, for the water, sanitary sewer, and stormwater services.  
10 The cumulative actual revenues of a given fiscal year are estimated as the sum of  
11 payments received in “Billing Year,” “Billing Year Plus 1,” and “Billing Year Plus  
12 2 and Beyond.” Please also see the explanation provided in PWD Statement No.  
13 7A, Schedule BV-6: WP-1.
- 14 • In the context of wholesale revenues, receipts refer to 100% of billings estimated  
15 for each wholesale customer.

16 B. For the purpose of this response, we assume “RATE LEVELS” referenced in the  
17 question above means the annual “level of revenue adjustments” projected in the FY  
18 2021 through FY 2025 financial plan. “Billings” are first projected based on existing  
19 rate schedules and projected units of service, for each fiscal year. Appropriate  
20 collection factors are then applied to Billings to estimate the actual cumulative  
21 “Receipts” for the fiscal year. The annual “revenue adjustments” (RATE LEVELS) for  
22 each fiscal year are then calculated based on the estimated cumulative Receipts and the  
23 corresponding net revenue requirements of the fiscal year.

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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

1 **PA-III-80.** PLEASE PROVIDE A COPY OF ALL AGENDAS AND ALL MINUTES OF  
2 TAP ADVISORY COMMITTEE MEETINGS FROM JULY 1, 2017 TO  
3 PRESENT.  
4

5 **RESPONSE:**

6 TAP Advisory Committee meetings were produced in response to discovery requests PA-  
7 V-13 and PA-V-14 in the 2018 rate proceeding and are available on the Rate Board's  
8 webpage.  
9

10 Recent meeting notes and agendas are provided in response attachment PA-III-80.  
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12 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-III-81.** PLEASE PROVIDE A COPY OF ALL WRITTEN PRESENTATIONS, MEMOS  
2 OR OTHER WRITTEN DOCUMENTS OF ANY NATURE FROM PWD OR  
3 WRB (INCLUDING THEIR CONSULTANTS) PROVIDED TO TAP  
4 ADVISORY COMMITTEE MEMBERS AT AN ADVISORY COMMITTEE  
5 MEETING FROM JULY 1, 2017 TO PRESENT.

6  
7 **RESPONSE:**

8 Please see response to PA-III-80.

9

10 **RESPONSE PROVIDED BY:** Philadelphia Water Department

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1 **PA-III-82.** PLEASE PROVIDE A COPY OF ALL WRITTEN PRESENTATIONS, MEMOS  
2 OR OTHER WRITTEN DOCUMENTS OF ANY NATURE FROM PWD OR  
3 WRB (INCLUDING THEIR CONSULTANTS) PROVIDED TO CITY  
4 COUNCIL, THE WATER BOARD, OR ANY OTHER PHILADELPHIA  
5 MUNICIPAL ENTITY OR OFFICIAL REGARDING TAP FROM JULY 2017  
6 TO PRESENT.

7  
8 **RESPONSE:**

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

13  
14 **RESPONSE PROVIDED BY:** Randy E. Hayman, Philadelphia Water Department, Michelle  
15 L. Bethel-Miller, Water Revenue Bureau, Raftelis Financial Consultants, Inc., and Black &  
16 Veatch Management Consulting, LLC.

1 **PA-III-83.** PLEASE PROVIDE A COPY OF ALL PRESENTATIONS BY A PWD OR WRB  
2 OFFICIAL (INCLUDING RAFTELLIS AND/OR BLACK AND VEATCH  
3 PERSONNEL TESTIFYING IN THIS PROCEEDING) TO A CONFERENCE,  
4 SEMINAR, OR OTHER PUBLIC OR INDUSTRY GATHERING REGARDING  
5 TAP FROM JULY 2017 TO PRESENT.  
6

7 **RESPONSE:**

8 Please see attached PA-III-83 Presentations. The attached documents may contain figures  
9 and estimates that may no longer represent TAP program performance or other metrics  
10 (such as lost revenue). The participant is directed to the current filing before the Water,  
11 Sewer and Storm Water Rate Board for current program statistics.  
12

13 **RESPONSE PROVIDED BY:** Randy E. Hayman, Philadelphia Water Department, Michelle L.  
14 Bethel-Miller, Water Revenue Bureau, Raftelis Financial Consultants, Inc., and Black & Veatch  
15 Management Consulting, LLC.  
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1 **PA-III-84.** PLEASE PROVIDE A COPY OF ALL PUBLICATIONS, REPORTS, OR  
2 OTHER PUBLISHED WRITTEN DOCUMENTS AUTHORED BY A PWD OR  
3 WRB OFFICIAL (INCLUDING RAFTELLIS AND/OR BLACK AND VEATCH  
4 PERSONNEL TESTIFYING IN THIS PROCEEDING), AND PUBLISHED,  
5 FROM JULY 2017 TO PRESENT.

6  
7 **RESPONSE:**

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

11  
12 The webpages are provided for your ease of use and reference: <https://www.wef.org/>,  
13 <https://www.awwa.org/>, and <https://www.nacwa.org/> should you wish to avail yourself of  
14 materials.

15  
16 The published articles may contain figures and estimates that may no longer represent  
17 current performance or metrics. The participant is directed to the current filing before the  
18 Water, Sewer and Storm Water Rate Board for current statistics and available relevant  
19 data.

20  
21  
22 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc., and Black & Veatch  
23 Management Consulting, LLC.

1 **PA-III-85.** PLEASE PROVIDE BY MONTH SINCE JULY 2017:

- 2 A. THE NUMBER OF TAP CUSTOMERS WHOSE ARREARS PRE-  
3 EXISTING AS OF THE DATE THEY APPLIED FOR TAP WOULD  
4 HAVE BEEN SUFFICIENT TO QUALIFY THEM FOR A MUNICIPAL  
5 LIEN;
- 6 B. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY  
7 ABOVE FOR WHOM PWD (INCLUDING WRB) PERFECTED A LIEN  
8 FOR THOSE PREEXISTING ARREARS;
- 9 C. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS  
10 UNDERLYING THE LIENS IDENTIFIED IMMEDIATELY ABOVE;
- 11 D. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY  
12 ABOVE FOR WHOM THE LIEN BASED ON PRE-EXISTING  
13 ARREARS WAS LATER SATISFIED BY THE CUSTOMER PAYING  
14 THE UNDERLYING DEBT;
- 15 E. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS FOR  
16 WHICH THE LIEN WAS REMOVED AS HAVING BEEN PAID IN  
17 FULL SUBSEQUENT TO THE PERFECTION OF THE LIEN;
- 18 F. THE DOLLARS OF FEES CHARGED TO CUSTOMERS WITH THOSE  
19 PRE-EXISTING DEBTS WHICH CHARGE WAS BASED ON THE  
20 PERFECTION OF THE LIEN;
- 21 G. THE AVERAGE DOLLARS OF UNPAID WATER BILLS SUBJECT TO  
22 A LIEN IDENTIFIED IN THIS QUESTION BEFORE ANY CHARGE  
23 FOR THE LIENING PROCESS WAS IMPOSED;
- 24 H. THE AVERAGE DOLLARS OF UNPAID WATER BILLS ONCE THE  
25 CHARGE FOR THE LIENING PROCESS WAS IMPOSED.

- 1 I. THE BASIS FOR ANY/ALL CHARGES IMPOSED ON CUSTOMER  
2 ACCOUNTS ASSOCIATED WITH THE PERFECTION OF THE LIEN;  
3 J. THE NUMBER OF TAP CUSTOMERS FOR WHOM THE LIENS  
4 IDENTIFIED IN SUB-PARAGRAPH "B" ABOVE WAS  
5 SUBSEQUENTLY CANCELLED OR OTHERWISE REMOVED FOR  
6 REASONS OTHER THAN THE PAYMENT OF THE UNDERLYING  
7 DEBT.  
8

9 **RESPONSE:**

10 In response to PA-III-85-I, the \$91.45 filing fee, as mandated by 42 Pa.C.S. § 1725 et seq.,  
11 42 Pa.C.S. § 3733, 72 P.S. § 3172, and First Judicial District of Pennsylvania  
12 Administrative Order 2008-01, is the basis for any/all charges imposed on customer  
13 accounts associated with the perfection of the lien.  
14

15 Please note there are no reports available that capture data for the remaining subsections of  
16 this interrogatory.  
17

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

- 2 A. THE NUMBER OF TAP CUSTOMERS WHOSE ARREARS  
3 INCURRED SUBSEQUENT TO THE DATE THEY APPLIED FOR TAP  
4 WOULD HAVE BEEN SUFFICIENT TO QUALIFY THEM FOR A  
5 MUNICIPAL LIEN;
- 6 B. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY  
7 ABOVE FOR WHOM PWD (INCLUDING WRB) PERFECTED A LIEN  
8 FOR THOSE IN-PROGRAM ARREARS;
- 9 C. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS  
10 UNDERLYING THE LIENS IDENTIFIED IMMEDIATELY ABOVE;
- 11 D. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS FOR  
12 WHICH THE LIEN WAS REMOVED AS HAVING BEEN PAID IN  
13 FULL SUBSEQUENT TO THE PERFECTION OF THE LIEN;
- 14 E. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY  
15 ABOVE FOR WHOM THE LIEN BASED ON IN-PROGRAM  
16 ARREARS WAS LATER SATISFIED BY THE CUSTOMER PAYING  
17 THE UNDERLYING DEBT;
- 18 F. THE DOLLARS OF FEES CHARGED TO CUSTOMERS WITH THOSE  
19 PRE-EXISTING DEBTS WHICH CHARGE WAS BASED ON THE  
20 PERFECTION OF THE LIEN;
- 21 G. THE BASIS FOR ANY/ALL CHARGES IMPOSED ON CUSTOMER  
22 ACCOUNTS ASSOCIATED WITH THE PERFECTION OF THE LIEN;
- 23 H. THE NUMBER OF TAP CUSTOMERS FOR WHOM THE LIENS  
24 IDENTIFIED IN SUB-PARAGRAPH "B" ABOVE WAS  
25 SUBSEQUENTLY CANCELLED OR OTHERWISE REMOVED FOR

1 REASONS OTHER THAN THE PAYMENT OF THE UNDERLYING  
2 DEBT.

3  
4 **RESPONSE:**

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

9  
10 Please note there are no reports available that capture data for the remaining subsections of  
11 this interrogatory.

12  
13 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-87.** PLEASE PROVIDE BY MONTH SINCE JULY 2017:

- 2 A. THE NUMBER OF TAP CUSTOMERS WHOSE ARREARS  
3 INCURRED SUBSEQUENT TO THE DATE THEY APPLIED FOR TAP  
4 WOULD NOT HAVE BEEN SUFFICIENT TO QUALIFY THEM FOR A  
5 MUNICIPAL LIEN, BUT WHOSE IN-PROGRAM ARREARS IN  
6 COMBINATION WITH PRE-EXISTING ARREARS WOULD HAVE  
7 BEEN SUFFICIENT TO QUALIFY THEM FOR A MUNICIPAL LIEN;
- 8 B. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY  
9 ABOVE FOR WHOM PWD (INCLUDING WRB) PERFECTED A LIEN  
10 FOR THOSE COMBINED IN-PROGRAM AND PRE-EXISTING  
11 ARREARS;
- 12 C. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS  
13 UNDERLYING THE LIENS IDENTIFIED IMMEDIATELY ABOVE;
- 14 D. THE AGGREGATE DOLLARS OF UNPAID WATER BILLS FOR  
15 WHICH THE LIEN WAS REMOVED AS HAVING BEEN PAID IN  
16 FULL SUBSEQUENT TO THE PERFECTION OF THE LIEN;
- 17 E. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY  
18 ABOVE FOR WHOM THE LIEN BASED ON COMBINED IN-  
19 PROGRAM AND PRE-EXISTING ARREARS WAS LATER  
20 SATISFIED BY THE CUSTOMER PAYING THE UNDERLYING  
21 DEBT;
- 22 F. THE DOLLARS OF FEES CHARGED TO CUSTOMERS WITH THOSE  
23 COMBINED IN-PROGRAM AND PRE-EXISTING DEBTS WHICH  
24 CHARGE WAS BASED ON THE PERFECTION OF THE LIEN;  
25

- 1 G. THE BASIS FOR ANY/ALL CHARGES IMPOSED ON CUSTOMER  
2 ACCOUNTS ASSOCIATED WITH THE PERFECTION OF THE LIEN;  
3 H. THE NUMBER OF TAP CUSTOMERS FOR WHOM THE LIENS  
4 IDENTIFIED IN SUB-PARAGRAPH "B" ABOVE WAS  
5 SUBSEQUENTLY CANCELLED OR OTHERWISE REMOVED FOR  
6 REASONS OTHER THAN THE PAYMENT OF THE UNDERLYING  
7 DEBT.  
8

9 **RESPONSE:**

10 In response to PA-III-87-G, the \$91.45 filing fee, as mandated by 42 Pa.C.S. § 1725 et  
11 seq., 42 Pa.C.S. § 3733, 72 P.S. § 3172, and First Judicial District of Pennsylvania  
12 Administrative Order 2008-01, is the basis for any/all charges imposed on customer  
13 accounts associated with the perfection of the lien.  
14

15 Please note there are no reports available that capture data for the remaining subsections of  
16 this interrogatory.  
17

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

- 4 A. JULY 1, 2017;  
5 B. JULY 1, 2018  
6 C. JULY 1, 2019  
7 D. JANUARY 1, 2020.  
8

9 **RESPONSE:**

10 As of January 1, 2020, WRB was able to implement its policy to perfect a lien on the  
11 unpaid water bills of a TAP participant. TAP participants are liened using the same rules  
12 that are applied to other WRB customers, namely: the unpaid debt must total \$1,000 or  
13 more; the unpaid debt has not been previously liened, is not in dispute, and is not  
14 protected by an active bankruptcy; and the customer had been notified via a message on  
15 their bill of the intent to file a lien for the water/sewer delinquency.  
16

17 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-89.** IF THERE WAS A CHANGE IN POLICY FROM ONE DATE TO THE NEXT  
2 AS IDENTIFIED ABOVE, PLEASE IDENTIFY THE DATE ON WHICH THE  
3 POLICY WAS CHANGED, IDENTIFY THE PERSON OR ENTITY MAKING  
4 FINAL APPROVAL OF THE CHANGE IN POLICY, AND PROVIDE A  
5 DETAILED DESCRIPTION OF THE BASIS FOR THE CHANGE IN POLICY.  
6

7 **RESPONSE:**

8 There was no change in policy. Implementation was not deployed until January 1, 2020,  
9 due to IT resources being devoted to the initial implementation and development of the  
10 TAP program.  
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12

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

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

12  
13 **RESPONSE:**

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

16  
17 To my knowledge, there are no communications available that capture the information  
18 requested.

19  
20 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-91.** PLEASE PROVIDE, IN AN ACTIVE EXCEL SPREADSHEET WITH ALL  
2 FORMULAE INTACT, CURRENT FOR THE MOST RECENT DATE  
3 POSSIBLE, A LIST OF ALL CURRENT OR FORMER TAP PARTICIPANTS  
4 WHO, SUBSEQUENT TO JULY 1, 2017, HAD A LIEN FILED FOR AN  
5 UNPAID WATER BILL, IDENTIFYING THE FOLLOWING DATA FOR  
6 EACH CUSTOMER:

- 7 A. THE TOTAL NUMBER OF LIENS, ALONG WITH THE DATE ON  
8 WHICH THEY WERE FILED, FOR UNPAID WATER BILLS;
- 9 B. FOR EACH SEPARATE LIEN, THE AMOUNT OF UNPAID WATER  
10 BILL MADE SUBJECT TO THE LIEN;
- 11 C. WHETHER EACH SEPARATE LIEN WAS FOR A PRE-EXISTING  
12 ARREARAGE (I.E., ARREARS EXISTING AT THE TIME THE  
13 CUSTOMER BECAME A TAP PARTICIPANT);
- 14 D. WHETHER EACH SEPARATE LIEN WAS FOR AN IN-PROGRAM  
15 ARREARAGES (I.E., ARREARS INCURRED SUBSEQUENT TO  
16 BECOMING A TAP PARTICIPANT);
- 17 E. WHETHER THE LIEN WAS SUBSEQUENTLY REMOVED OR  
18 OTHERWISE CANCELLED BECAUSE OF A PAYMENT-IN-FULL OF  
19 THE LIENED AMOUNT;
- 20 F. THE DOLLAR AMOUNT OF THE LIEN THAT WAS REMOVED OR  
21 OTHERWISE CANCELLED DUE TO A PAYMENT-IN-FULL OF THE  
22 LIENED AMOUNT;
- 23 G. WHETHER THE LIEN WAS SUBSEQUENTLY REMOVED OR  
24 OTHERWISE CANCELLED FOR REASONS OTHER THAN FULL  
25 PAYMENT OF THE LIENED AMOUNT;

- 1 H. THE DOLLAR AMOUNT OF THE LIEN THAT WAS REMOVED OR  
2 OTHERWISE CANCELLED FOR REASONS OTHER THAN FULL  
3 PAYMENT OF THE LIENED AMOUNT;  
4 I. WHETHER THE CUSTOMER IS CURRENTLY AN ACTIVE TAP  
5 PARTICIPANT;  
6 J. WHETHER THE CUSTOMER IS CURRENTLY AN ACTIVE PWD  
7 CUSTOMER, BUT NOT CURRENTLY AN ACTIVE TAP  
8 PARTICIPANT;  
9 K. WHETHER THE CUSTOMER WAS DISCONNECTED FOR  
10 NONPAYMENT SUBSEQUENT TO THE DATE ON WHICH A LIEN  
11 WAS PLACED.

12  
13 **RESPONSE:**

14 Please note there are no reports available that capture this data.  
15

16 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-92.** REFERENCE: PWD STATEMENT NO. 7, PAGES 7 - 8: PLEASE PROVIDE A  
2 SINGLE COPY, FOR THE PERIOD JULY 1, 2017 TO PRESENT, OF THE  
3 FOLLOWING:

- 4 A. EACH DAILY AND WEEKLY CUSTOMER ASSISTANCE  
5 APPLICATION PROCESSING REPORT;  
6 B. EACH REPORT PROVIDING MONTHLY PROGRAM STATISTICS;  
7 C. EACH PERIODIC COST OF PROGRAM REPORT;  
8 D. EACH ANNUAL CITY COUNCIL-REQUIRED REPORT; AND  
9 E. EACH OTHER AD HOC AND PERIODIC REPORTS TO SUPPORT  
10 MANAGEMENT OF TAP THAT HAS BEEN REQUESTED AND  
11 DEVELOPED.

12  
13 **RESPONSE:**

14 Preparation of this response is in progress and will be provided in the future.  
15

16 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-93.** REFERENCE: PWD STATEMENT NO. 7, PAGE 8: PLEASE PROVIDE A  
2 SINGLE COPY, FOR THE PERIOD JULY 1, 2017 TO PRESENT, OF THE  
3 FOLLOWING:

- 4 A. EACH REPORT REPORTING THE NUMBER OF TAP  
5 APPLICATIONS REQUESTED, BY METHOD REQUESTED;  
6 B. EACH REPORT REPORTING THE NUMBER OF TAP  
7 APPLICATIONS SUBMITTED, BY METHOD SUBMITTED;  
8 C. EACH REPORT REPORTING THE NUMBER OF APPLICATIONS BY  
9 STATUS CHANGE;  
10 D. EACH REPORT REPORTING THE NUMBER OF CUSTOMERS BY  
11 PROGRAM ENROLLED;  
12 E. EACH REPORT REPORTING TAP PARTICIPATION LEVELS;  
13 F. EACH REPORT REPORTING TAP DISCOUNT AMOUNTS;  
14 G. EACH REPORT REPORTING TAP BILL PAYMENTS.

15  
16 **RESPONSE:**

17 Preparation of this response is in progress and will be provided in the future.  
18

19 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-94.** FOR EACH FISCAL YEAR 2017 TO PRESENT INCLUSIVE (2020 YEAR TO  
2 DATE), PLEASE PROVIDE BOTH THE NUMBER AND PERCENTAGE OF  
3 PAYMENTS RECEIVED FROM RESIDENTIAL CUSTOMERS VIA THE  
4 FOLLOWING PAYMENT CHANNELS: MAIL, ONLINE, AUTO DEBIT,  
5 CREDIT/DEBIT CARD, PAYMENT AGENTS, OTHER.  
6

7 **RESPONSE:**

8 See attached PA-III-94 Payment Channel Number Report. Please note that in FY 2017 and  
9 FY 2018 Credit/Debit Card payments were not reported separately, but as part of Online  
10 payments.  
11

12 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-95.** PLEASE PROVIDE THE SAME DATA AS PRESENTED IMMEDIATELY  
2 ABOVE EXCEPT IN DOLLAR TERMS RATHER THAN IN TERMS OF  
3 NUMBER OF PAYMENTS.  
4

5 **RESPONSE:**

6 See attached PA-III-95 Payment Channel Dollar Report. Please note that in FY 2017 and  
7 FY 2018 Credit/Debit Card payments were not reported separately, but as part of Online  
8 payments.  
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10 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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**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.

Payment Type	Definition
ACH	Automated Clearing House (wire transfer) includes all wire transfer transactions and is not broken down into debit or credit.
ALL1	Alliance One (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods
ECK	Electronic Check payment via City's web-based payment portal including but not limited to the Mobile App
IVR	Interactive Voice Response (payment by phone) includes credit/debit card and prepaid EBT card payments but cannot be broken down into those categories
OTHER	Sheriff Sale payments, Field Service Representative collected payments, and bulk receipts.
PENN	Penn Credit (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods
POS	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
RCB	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

1 2	REMITPRO	Mailed-in checks and money orders.
3 4	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
5	ZC	ZipCheck, automated direct debit via PNC Bank
6 7	ZP	ZipPhone, automated bank debit from customer's bank and/or third party pay station

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9 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau

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**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.

Payment Type	Definition
ACH	Automated Clearing House (wire transfer) includes all wire transfer transactions and is not broken down into debit or credit.
ALL1	Alliance One (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods
ECK	Electronic Check payment via City's web-based payment portal including but not limited to the Mobile App
IVR	Interactive Voice Response (payment by phone) includes credit/debit card and prepaid EBT card payments but cannot be broken down into those categories
OTHER	Sheriff Sale payments, Field Service Representative collected payments, and bulk receipts.
PENN	Penn Credit (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods
POS	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
RCB	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
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

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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

1 **PA-III-98.** FOR EACH FISCAL YEAR 2017 TO PRESENT INCLUSIVE (2020 YEAR TO  
2 DATE), PLEASE PROVIDE THE DOLLARS OF REVENUE GENERATED  
3 FROM RESIDENTIAL CUSTOMERS THROUGH THE \$3.95 FEE FOR  
4 DEBIT/CREDIT CARD TRANSACTIONS.

5  
6 **RESPONSE:**

7 There is no report available that captures the data requested because there is no City  
8 revenue generated from residential customers through the \$3.95 fee for debit/credit card  
9 transactions as the fee is collected by and for the City's third-party vendors. Additionally,  
10 please note that the residential debit/credit card transaction fee was lowered from \$3.95 to  
11 \$2.95 in October 2019.

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13 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-99.** IF THE RESPONSE TO THE QUESTION IMMEDIATELY ABOVE IS NOT  
2 THE PRODUCT OF THE NUMBER OF PAYMENTS IDENTIFIED ABOVE  
3 TIMES \$3.95, PLEASE PROVIDE AN EXPLANATION OF WHY NOT.  
4

5 **RESPONSE:**

6 Please see response to PA-III-98.  
7

8 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-100.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE RATEMAKING  
2 TREATMENT OF THE REVENUE REPORTED IN QUESTION #5 ABOVE.  
3

4 **RESPONSE:**

5 Revenues derived from the customer fees referenced in PA-III-5, are considered  
6 miscellaneous revenues, which are net from the system operating expenses (see Line 10 of  
7 Tables W-10 and WW-10, PWD Statement 7A, Schedule BV-1).  
8

9 The Department does not have customer classes.  
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11 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.  
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1 **PA-III-101.** PLEASE PROVIDE A DETAILED COST BASIS FOR THE \$3.95  
2 RESIDENTIAL FEE FOR CREDIT AND DEBIT CARD TRANSACTIONS.

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4 **RESPONSE:**

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

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

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8 **RESPONSE PROVIDED BY:** Melissa LaBuda, Philadelphia Water Department

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1 **PA-III-102.** PLEASE PROVIDE, BY YEAR FOR FISCAL YEARS 2020, 2021 AND 2022, A  
2 PROJECTION OR ESTIMATE OF THE LOST REVENUE THAT WOULD BE  
3 EXPERIENCED SHOULD PWD NOT CHARGE THE \$3.95 FEE PER  
4 CREDIT/DEBIT CARD TRANSACTION.  
5

6 **RESPONSE:**

7 The transaction fee is governed by the terms of the contract with the vendor. The fee is not  
8 a revenue to the Water Department as such there is no lost revenue. Additionally, please  
9 note that the residential debit/credit card transaction fee was lowered from \$3.95 to \$2.95  
10 in October 2019.  
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12 **RESPONSE PROVIDED BY:** Melissa LaBuda, Philadelphia Water Department  
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1 **PA-III-103.** PLEASE PROVIDE A COMPREHENSIVE LIST OF MUNICIPAL WATER  
2 UTILITIES THAT DO NOT CHARGE A FEE FOR CREDIT/DEBIT CARD  
3 TRANSACTIONS.  
4

5 **RESPONSE:**

6 There are no documents or reports responsive to this request.  
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8 **RESPONSE PROVIDED BY:** Michelle L. Bethel-Miller, Water Revenue Bureau  
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1 **PA-III-104.** PLEASE PROVIDE A COMPREHENSIVE LIST OF REGULATED  
2 PENNSYLVANIA UTILITIES THAT DO NOT CHARGE A FEE FOR  
3 CREDIT/DEBIT CARD TRANSACTIONS.

4  
5 PLEASE PROVIDE A COMPREHENSIVE LIST OF PHILADELPHIA  
6 MUNICIPAL OFFICES/PROGRAMS THAT DO NOT CHARGE A FEE FOR  
7 DEBIT/CREDIT CARD TRANSACTIONS WITH THAT OFFICE.

8  
9 **RESPONSE:**

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

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

5 Preparation of this response is in progress and will be provided in the future.  
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7 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-III-106.** PLEASE IDENTIFY ANY CLUSTERS OF ENGLISH AS A SECOND  
2 LANGUAGE (“ESL”) CUSTOMERS THAT EXIST IN THE PWD SERVICE  
3 TERRITORY BY COMMUNITY, ZIP CODE, CENSUS TRACT, OR OTHER  
4 GEOGRAPHIC REGION OR AREA BY WHICH ESL IS TRACKED.  
5 SEPARATELY PROVIDE A DETAILED EXPLANATION OF HOW  
6 CLUSTERS OF ESL CUSTOMERS ARE IDENTIFIED.

7  
8 **RESPONSE:**

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

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11 **RESPONSE PROVIDED BY:** Philadelphia Water Department

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