RESPONSE TO
PUBLIC ADVOCATE’S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-66

Dated: February 2021
PA-II-1. WHEN A CUSTOMER APPLIES FOR SERVICE AT A RESIDENCE, DOES PWD ASK THE APPLICANT TO IDENTIFY IF THE SERVICE ADDRESS WILL BE EXCLUSIVELY OCCUPIED BY THE APPLICANT OR WHETHER IT MAY BECOME OCCUPIED BY TENANTS? PLEASE PROVIDE A COPY OF ANY WRITTEN DOCUMENTS, FORMS, OR CALL SCRIPTS WHERE THIS INFORMATION IS REQUIRED OR REQUESTED.

RESPONSE:

No, therefore there are no documents responsive to this request.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-2. WHEN A CUSTOMER CONTACTS PWD REQUESTING A VOLUNTARY RELINQUISHMENT OF SERVICE TO A RESIDENTIAL PROPERTY, DOES PWD INQUIRE IF THE SERVICE ADDRESS IS OCCUPIED EXCLUSIVELY BY THE OWNER/RATEPAYER OR BY TENANTS? PLEASE PROVIDE A COPY OF ANY WRITTEN DOCUMENTS, LETTERS, FORMS, OR CALL SCRIPTS WHERE THIS INFORMATION IS REQUIRED OR REQUESTED.

RESPONSE:

No, therefore there are no documents responsive to this request.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-3. DOES PWD REQUIRED OR PROVIDE AN AFFIDAVIT FOR USE BY A LANDLORD RATEPAYER REQUESTING VOLUNTARY RELINQUISHMENT OF SERVICE TO A RESIDENTIAL PROPERTY CERTIFYING THAT NO TENANTS OCCUPY THE PROPERTY? PROVIDE A COPY OF ANY AFFIDAVITS OR OTHER WRITTEN DOCUMENTS, LETTERS, OR FORMS USED, CURRENTLY IN USE AND/OR DEVELOPED FOR POSSIBLE USE BY PWD.

RESPONSE:

No, therefore there are no documents responsive to this request.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-4. PLEASE DESCRIBE ANY AND ALL LEGAL ACTION TAKEN BY PWD WITHIN THE PAST FIVE (5) YEARS, TO OBTAIN FROM A LANDLORD RATE PAYER THE NAMES AND ADDRESSES OF TENANTS OCCUPYING RESIDENTIAL PROPERTY TO WHICH SERVICE IS BEING DISCONTINUED?

RESPONSE:

No legal action has been taken over the last five years to obtain the names and addresses of tenants occupying residential property to which service is being discontinued.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-5. WITHIN THE PAST FIVE (5) YEARS, HOW MANY REQUESTS FOR THE
NAMES AND ADDRESSES OF TENANTS OCCUPYING A RESIDENTIAL
PROPERTY HAVE BEEN MADE BY PWD?

A. WHAT IS THE PROCEDURE FOR REQUESTING THAT INFORMATION?
B. PROVIDE COPIES OF ANY LETTERS AND FORMS USED TO OBTAIN
THIS INFORMATION.

RESPONSE:

None

A. Prior to shut-off, a notice is sent to the landlord requesting the names of tenants.
   Please refer to PWD Regulation 100.5(b).

B. See response attachment PA-II-5 USTRA Landlord Shutoff Notice.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-6. DOES PWD ALLOW SERVICE TO BE ESTABLISHED IN THE NAME OF SOMEONE OTHER THAN THE PROPERTY OWNER (I.E. A TENANT)? IF YES, WHAT IDENTIFICATION IS REQUIRED AND/OR PROCEDURE NEEDS TO BE FOLLOWED BEFORE SERVICE CAN BE STARTED IN THAT PERSON’S NAME?

RESPONSE:
Yes. Please refer to PWD Regulation 100.2(a).

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-7. PROVIDE A COPY OF THE NOTICE PROVIDED TO LANDLORD RATEPAYERS PRIOR TO DISCONTINUANCE OF SERVICE TO A PROPERTY LIKELY TO BE OCCUPIED BY “USTRA TENANTS.”

RESPONSE:

Please see response attachment PA-II-5. Also, please see response attachment PA-II-7.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-8. DOES PWD NOTIFY ANY MUNICIPAL DEPARTMENT REGARDING DISCONTINUANCE OF SERVICE TO A RESIDENTIAL PROPERTY?

A. DESCRIBE THE CIRCUMSTANCES AND PROCESS BY WHICH PWD NOTIFIES A DEPARTMENT OF THE CITY OF PHILADELPHIA.

B. WITHIN THE PAST FIVE (5) YEARS, HOW MANY NOTIFICATIONS WERE SENT BY PWD TO A DEPARTMENT OF THE CITY OF PHILADELPHIA REGARDING DISCONTINUANCE OF SERVICE TO A RESIDENTIAL PROPERTY?

RESPONSE:

The only department notified is WRB.

A. WRB’s accounting system Basis2 receives a data file from PWD’s permit tracking system on a daily basis. Basis2 then automatically updates the account to discontinued status.

B. See response attachment PA-II-8 Discontinuance Permits.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-9. PROVIDE A COPY OF ANY AND ALL NOTICE(S) PROVIDED TO “USTRA TENANTS” PRIOR TO A DISCONTINUANCE OF SERVICE TO A PROPERTY OCCUPIED OR LIKELY TO BE OCCUPIED TO BY “USTRA TENANTS.” DOES THIS NOTICE DIFFER FROM THE STANDARD NOTICE PROVIDED TO RESIDENTIAL UNITS THAT ARE “REASONABLY LIKELY TO BE OCCUPIED BY AN AFFECTED TENANT OF THE PROPOSED DISCONTINUANCE”? IF YES, PLEASE DESCRIBE HOW THE TWO DIFFER.

RESPONSE:

Please see response to PA-II-7. The USTRA notice provided specifically mentions the Pennsylvania Utility Service Tenants Rights Act and directs landlords to identify any tenants that will be affected by a water shutoff whereas a standard shut-off notice contains information directing tenants who are not responsible for the water bill through the rental agreement to contact the PWD Customer Contact Center.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-10. HOW DOES PWD PROVIDE NOTICE TO “USTRA TENANTS” AND TO PROPERTIES OCCUPIED OR LIKELY TO BE OCCUPIED BY “USTRA TENANTS”?

RESPONSE:

See response to PA-II-9.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-11. WHAT DOES PWD CONSIDER WHEN DETERMINING WHETHER IT A
RESIDENTIAL PROPERTY IS “REASONABLY LIKELY TO BE OCCUPIED”
BY AN USTRA TENANT? PLEASE EXPLICITLY IDENTIFY ANY SPECIFIC
FACTORS OR INDICATORS RELIED ON BY PWD TO MAKE SUCH A
DETERMINATION, AND PROVIDE A COPY OF ANY WRITTEN
DOCUMENT, TRAINING MATERIALS, LETTER, OR MEMORANDA
DESCRIBING THIS POLICY.

RESPONSE:
WRB reviews several indicators in determining whether a residential property is reasonably
likely to be occupied by an USTRA tenant including the installation code of the property in
Basis2, whether there is an off-site mailing address, whether there are any tenant related
calls in Basis2, and whether there is a rental license.

There are no documents responsive to this request.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-12. DOES PWD MAKE AVAILABLE INFORMATION REGARDING THE
RIGHTS OF AN “USTRA TENANTS” TO CONTINUE OR RESUME SERVICE
OTHER THAN BY NOTICE(S) SENT TO THE TENANT AND/OR
PROPERTY? DETAIL ALL OTHER METHODS USED TO DISSEMINATE
THIS INFORMATION (I.E. POSTED ON WEBSITE, PRINTED ON FLYER
DISPLAYED AT PAYMENT OFFICE, TERMINATION NOTICE).

RESPONSE:
Yes, the top portion of every shut-off notice contains information regarding USTRA
Tenant rights. There is also information available on the Department of Revenue website

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-13. Describe the procedure taken by PWD when a person notifies PWD that he/she is a tenant and lives at a residence that is scheduled for discontinuance of service but was not provided notice of a tenant’s rights to continue or resume service under USTRA.

Response:

Tenants are provided notice of a tenant’s rights to continue or resume service under USTRA on the disconnection notice. Please see response attachment PA-II-7.

Further, when a tenant contacts PWD and/or WRB regarding service disconnection that does not have permission in their lease or from the owner to put the water bill in their name and the water is about to be shut-off due to non-payment, customer service representatives inform customers about their rights under USTRA. The representatives then process the tenant into the USTRA program upon the tenant’s request.

Response provided by: Susan M. Crosby, Water Revenue Bureau
PA-II-14. DESCRIBE THE PROCESS “USTRA TENANTS” MUST TAKE TO APPLY TO HAVE UTILITY SERVICE CONTINUED OR RESUMED TO A PROPERTY IN WHICH SERVICE WAS DISCONTINUED DUE TO A LANDLORD RATEPAYER’S FAILURE TO PAY THE BILL?

A. WHAT DOCUMENTATION IS REQUIRED OF “USTRA TENANTS” TO SEEK TO HAVE UTILITY SERVICE CONTINUED OR RESUMED?

B. PROVIDE ANY AFFIDAVITS USED, CURRENTLY IN USE AND/OR DEVELOPED FOR POSSIBLE USE BY PWD FOR “USTRA TENANTS” SEEKING TO APPLY FOR UTILITY SERVICE TO BE CONTINUED OR RESUMED TO A PREMISES IN WHICH SERVICE WAS DISCONTINUED DUE TO A LANDLORD RATEPAYER’S FAILURE TO PAY THE BILL.

RESPONSE:

Tenants must reach out to WRB and inform staff they are a tenant and the water is about to be shut-off for non-payment. At that time, their rights will be explained to them and they will be added as an USTRA tenant.

A. Please refer to PWD Regulation 100.3 “USTRA Tenant Rights” which sets out the requirements tenants must satisfy to have water service continued.

B. There are no documents responsive to this request.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-15. DOES PWD REQUIRE THAT “USTRA TENANTS” PUT SERVICE INTO THEIR NAME OR OTHERWISE ASSUME FINANCIAL RESPONSIBILITY FOR ANY PORTION OF THE BILL TO THE RESIDENCE? IN ANSWERING THIS QUESTION, PLEASE SPECIFICALLY DESCRIBE THE FINANCIAL LIABILITY WHICH MUST BE ASSUMED BY AN USTRA TENANT.

RESPONSE:

Please refer to PWD Regulation 100.3 - “USTRA Tenant Rights.”

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-16. PROVIDE A COPY OF THE NOTICE OR NOTICES USED BY PWD TO NOTIFY “USTRA TENANTS” OF THE AMOUNT DUE FOR EACH SUCCEEDING PERIOD AFTER THEY ELECT TO CONTINUE OR RESUME SERVICE AND MAKE AN INITIAL PAYMENT. HOW OFTEN IS THIS NOTICE ISSUED?

RESPONSE:

See response attachment PA-II-16 USTRA Tenant Bill. Our vendor, Revenue Collections Bureau (“RCB”), sends a notice to the tenant every thirty (30) days with the amount due that month.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-17. DOES PWD REFUND PAYMENTS MADE BY “USTRA TENANTS” WHEN THE TENANT HAS ELECTED TO CONTINUE OR RESUME SERVICE UNDER USTRA/SECTION 1521 ET AL. OF THE PUBLIC UTILITY CODE AND MADE SOME PAYMENT, BUT FAILS TO SATISFY THE REQUIREMENTS OF CONTINUED SERVICE LEADING TO TERMINATION?

A. IN THE PAST FIVE (5) YEARS, HOW MANY REFUNDS HAS PWD ISSUED UNDER THIS TYPE OF CIRCUMSTANCE?

B. DESCRIBE THE PROCEDURES PWD USES TO IDENTIFY TENANTS THAT MAY BE ELIGIBLE FOR THESE REFUNDS.

C. DESCRIBE THE PROCEDURES PWD USES TO ISSUE THESE REFUNDS.

RESPONSE:

The City is in compliance with all its obligations under USTRA.

A. No refunds have been issued or requested in the last five (5) years.

B. WRB relies on tenant to self-identify.

C. See response attachment PA-II-17-C Refund Petition.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-18.  DESCRIBE THE TRAINING PROVIDED TO CUSTOMER SERVICE REPRESENTATIVES REGARDING THE RIGHTS OF “USTRA TENANTS.”

RESPONSE:

See response attachment PA-II-18 USTRA Training Documents.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-19. PROVIDE ANY TRAINING MATERIAL, HANDBOOKS OR OTHER
WRITTEN DOCUMENTS USED IN TRAINING STAFF ON THIS SUBJECT.

RESPONSE:

Please see response to PA-II-18.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-20. PLEASE PROVIDE A TEMPLATE COPY OF ANY AND ALL COLLECTION NOTICES SENT TO RESIDENTIAL CUSTOMERS, INCLUDING ANY TERMINATION NOTICE OR NOTICES THAT PWD PROVIDES TO “USTRA TENANTS.”

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

RESPONSE PROVIDED BY: Water Revenue Bureau
PA-II-21. WHAT STEPS DOES PWD TAKE TO DETERMINE WHETHER A DWELLING UNIT IS TENANT OCCUPIED PRIOR TO TERMINATING SERVICE?

RESPONSE:

Please see responses to PA-II-11 and PA-II-13. If a customer informs the PWD staff member performing the termination of service that they are a new tenant in the property, service to the property will not be terminated.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Philadelphia Water Department
PA-II-22. WHEN A “USTRA TENANT” HAS EXERCISED THEIR RIGHT TO CONTINUED SERVICE:

A. WHAT IS THE INITIAL AMOUNT THEY NEED TO PAY TO CONTINUE SERVICE?

B. HOW DOES PWD DETERMINE THE FUTURE MONTHLY PAYMENTS REQUIRED TO CONTINUE SERVICE?

C. HOW IS THE TENANT NOTIFIED OF THE MONTHLY AMOUNT THEY MUST PAY?

RESPONSE:

A. Please refer to 68 P.S. § 399.7 “Rights of tenants to continued service” as well as PWD Regulation 100.3 “USTRA Tenant Rights.”

B. Please refer to 68 P.S. § 399.7 “Rights of tenants to continued service” as well as PWD Regulation 100.3 “USTRA Tenant Rights.”

C. Please see response to PA-II-16.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Philadelphia Water Department
PA-II-23. HOW OFTEN DOES PWD PERFORM ACTUAL METER READINGS?

RESPONSE:

Meter readings are performed on approximately a monthly basis.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Philadelphia Water Department
PA-II-24. HOW OFTEN DOES PWD PERFORM ESTIMATED METER READINGS? IF ESTIMATED METER READINGS ARE NOT PERFORMED ON A PREDETERMINED PERIODIC BASIS, PLEASE EXPLAIN THE CIRCUMSTANCES IN WHICH PWD PERFORMS AN ESTIMATED METER READING INSTEAD OF AN ACTUAL METER READING, AND THE MAXIMUM NUMBER OF MONTHS IT WILL CONTINUE TO PERFORM AN ESTIMATED READING.

RESPONSE:

If PWD cannot obtain an actual reading within three days of the scheduled reading date, that cycle’s bill is estimated. Cycles will continue to be estimated until an actual reading is able to be obtained.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Philadelphia Water Department
PA-II-25. HAS PWD OR ANY THIRD PARTY ON BEHALF OF PWD ANALYZED OR OTHERWISE STUDIED AVAILABLE CENSUS DATA TO DETERMINE LANGUAGE PREFERENCES IN ITS SERVICE TERRITORY?

RESPONSE:

No.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Philadelphia Water Department
PA-II-26. IN WHAT ORDER DOES PWD APPLY CUSTOMER PAYMENTS, INCLUDING BUT NOT LIMITED TO CURRENT WATER AND/OR WASTEWATER CHARGES, PAYMENT ARRANGEMENTS, PAST-DUE WATER AND/OR WASTEWATER CHARGES, LATE FEES, COLLECTIONS FEES, TURN-ON FEES, ETC.? PLEASE DESCRIBE PWD’S PAYMENT POSTING POLICY IN DETAIL, AND PROVIDE A COPY OF ANY WRITTEN DOCUMENTS OR WORKPAPERS WHICH DESCRIBE OR OUTLINE ITS PAYMENT POSTING POLICY.

RESPONSE:

Payments are applied to the transactions with the oldest due date through the most recent due date. When transactions all have the same due date, payments are applied in this order:

1. Sundry invoices (these are charges in Basis2 for bad check fees, meter tamper charges, lien fees, etc.)
2. Penalties
3. Stormwater charges
4. Water and sewer service and quantity charges (i.e. usage)
   a. Sewer Service
   b. Water Service
   c. Sewer Usage
   d. Water Usage
5. Payments against payment agreements
6. Meter and nuisance charges (AGENCY charges)
7. HELP Loans

Additionally, when there is an active payment agreement on an account, Basis2 looks at transactions covered in a payment agreement as a collective entity. It does not look at the
individual transactions’ payment due dates; rather, it refers to the payment agreement’s schedule of payments.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Henrietta Locklear, Raftelis Financial Consultants
PA-II-27. IF A CUSTOMER PAYS FOR WATER AND WASTEWATER CHARGES WITH A SINGLE CHECK, AND THAT CHECK IS RETURNED, IS THE CUSTOMER ASSESSED A RETURN CHECK CHARGE UNDER BOTH THE WATER AND WASTEWATER TARIFFS? IF YES, PLEASE PROVIDE A JUSTIFICATION FOR THE DUPLICATE FEES?

RESPONSE:

No, they are not assessed duplicate fees.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-28. IF A CUSTOMER’S NONPAYMENT OF BOTH WATER AND
WASTEWATER SERVICE RESULTS IN COLLECTIONS AND/OR
ENFORCEMENT ACTIONS IS THE CUSTOMER CHARGED FOR RELATED
FEES UNDER BOTH THE WATER AND WASTEWATER TARIFFS? IF YES,
PLEASE PROVIDE A JUSTIFICATION FOR THE DUPLICATION OF COSTS.

RESPONSE:

No, they are not assessed duplicate charges.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-29. IF A CUSTOMER REQUESTS HISTORICAL BILLING OR IS SET A FINAL BILL FOR WATER AND WASTEWATER SERVICE, ARE THEY CHARGED THE ASSOCIATED CHARGES AND FEES UNDER BOTH THE WATER AND WASTEWATER TARIFFS? IF YES, PLEASE PROVIDE A JUSTIFICATION FOR THE DUPLICATION OF COSTS.

RESPONSE:
There are no charges for billing histories, also known as account statements. PWD does not issue “final bills.”

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-30. FOR EACH FISCAL YEAR 2017 TO PRESENT INCLUSIVE (2020 YEAR TO DATE), PLEASE PROVIDE BOTH THE NUMBER AND PERCENTAGE OF PAYMENTS RECEIVED FROM RESIDENTIAL CUSTOMERS VIA THE FOLLOWING PAYMENT CHANNELS: MAIL, ONLINE, AUTO DEBIT, CREDIT/DEBIT CARD, PAYMENT AGENTS, OTHER.

RESPONSE:

See response attachment PA-II-30 Payment Channel Number Report.

Please note that from fiscal year 2017 through December 31, 2020, credit/debit card payments were not reported separately, but as part of online payments.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-31. PLEASE PROVIDE THE SAME DATA AS PRESENTED IMMEDIATELY ABOVE EXCEPT IN DOLLAR TERMS RATHER THAN IN TERMS OF NUMBER OF PAYMENTS.

RESPONSE:

See response attachment PA-II-31 Payment Channel Dollar Report.

Please note that from fiscal year 2017 through December 31, 2020, credit/debit card payments were not reported separately, but as part of online payments.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-32. 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 response attachment PA-II-32 Payment Type Number Report.

Payments made through “MyPhillyWaterBill,” our electronic payment website operated by Kubra, are captured in the following entries: ACH, ECK, IVR, and WEB. Payments from collection agencies could have been made via any method the agency allows, but we do not receive information about those payment methods.

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<td>ALL1</td>
<td>Alliance One (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods</td>
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<td>Electronic Check payment via City’s web-based payment portal including but not limited to the Mobile App</td>
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<td>Interactive Voice Response (payment by phone) includes credit/debit card and prepaid EBT card payments but cannot be broken down into those categories</td>
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<td>Sheriff Sale payments, Field Service Representative collected payments, and bulk receipts.</td>
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<td>Penn Credit (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods</td>
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<tr>
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<td>ZC</td>
<td>ZipCheck, automated direct debit via PNC Bank</td>
</tr>
<tr>
<td>ZP</td>
<td>ZipPhone, automated bank debit from customer’s bank and/or third party pay station</td>
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**RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
PA-II-33. PLEASE PROVIDE THE SAME DATA AS PRESENTED IMMEDIATELY ABOVE EXCEPT IN DOLLAR TERMS RATHER THAN IN TERMS OF NUMBER OF PAYMENTS.

RESPONSE:

See response attachment PA-II-33 Payment Type Dollar Report. Payments made through “MyPhillyWaterBill,” our electronic payment website operated by Kubra, are captured in the following entries: ACH, ECK, IVR, and WEB. Payments from collection agencies could have been made via any method the agency allows, but we do not receive information about those payment methods.

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## PHILADELPHIA WATER DEPARTMENT
Response to PA Interrogatory

### Public Interrogatory Set #II - 36

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**RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
FOR EACH FISCAL YEAR 2017 TO PRESENT INCLUSIVE (2020 YEAR TO DATE), PLEASE PROVIDE THE DOLLARS OF REVENUE GENERATED FROM RESIDENTIAL CUSTOMERS THROUGH THE $3.95 FEE FOR DEBIT/CREDIT CARD TRANSACTIONS.

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-35. IF THE RESPONSE TO THE QUESTION IMMEDIATELY ABOVE IS NOT
THE PRODUCT OF THE NUMBER OF PAYMENTS IDENTIFIED ABOVE
TIMES $3.95, PLEASE PROVIDE AN EXPLANATION OF WHY NOT.

RESPONSE:

Please see response to PA-II-34.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-36. PLEASE PROVIDE A DETAILED EXPLANATION OF THE RATEMAKING TREATMENT OF THE REVENUE REPORTED IN QUESTION #5 ABOVE.

RESPONSE:

Question PA-II-5 and the associated response did not relate to the subject matter referenced in the question above (i.e. treatment of revenues for ratemaking purposes).

There are no revenues reported in response to PA-II-5. Therefore, there is no ratemaking treatment.

RESPONSE PROVIDED BY: Philadelphia Water Department and Black & Veatch Management Consulting, LLC.
PA-II-37. PLEASE PROVIDE A DETAILED COST BASIS FOR THE $3.95 RESIDENTIAL FEE FOR CREDIT AND DEBIT CARD TRANSACTIONS.

RESPONSE:

The transaction fee is governed by the terms of the contract with the vendor. Additionally, please see response to PA-II-34.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-38. PLEASE PROVIDE, BY YEAR FOR FISCAL YEARS 2020, 2021 AND 2022, A PROJECTION OR ESTIMATE OF THE LOST REVENUE THAT WOULD BE EXPERIENCED SHOULD PWD NOT CHARGE THE $3.95 FEE PER CREDIT/DEBIT CARD TRANSACTION.

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-39. PLEASE PROVIDE A COMPREHENSIVE LIST OF MUNICIPAL WATER UTILITIES THAT DO NOT CHARGE A FEE FOR CREDIT/DEBIT CARD TRANSACTIONS.

RESPONSE:

There are no documents or reports responsive to this request.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-40. PLEASE PROVIDE A COMPREHENSIVE LIST OF REGULATED PENNSYLVANIA UTILITIES THAT DO NOT CHARGE A FEE FOR CREDIT/DEBIT CARD TRANSACTIONS.

RESPONSE:

There are no documents or reports responsive to this request.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-41. PLEASE PROVIDE A COMPREHENSIVE LIST OF PHILADELPHIA MUNICIPAL OFFICES/PROGRAMS THAT DO NOT CHARGE A FEE FOR DEBIT/CREDIT CARD TRANSACTIONS WITH THAT OFFICE.

RESPONSE:

There are no documents or reports responsive to this request.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-42. PLEASE PROVIDE A SINGLE COPY OF THE LANGUAGE ACCESS PLAN SUBMITTED BY PWD TO THE CITY OF PHILADELPHIA.

RESPONSE:

The language access plan can be found online at:


RESPONSE PROVIDED BY: Philadelphia Water Department
PA-II-43. IF PWD ASSERTS THAT IT IS EXEMPT FROM, OR NOT SUBJECT TO, PHILADELPHIA’S LOCAL ORDINANCE REQUIRING THE PREPARATION AND SUBMISSION OF A LANGUAGE ACCESS PLAN, PLEASE PROVIDE A DETAILED EXPLANATION OF THE BASIS FOR THAT ASSERTION.

RESPONSE:

PWD is not exempt.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-II-44. PLEASE IDENTIFY ANY CLUSTERS OF ENGLISH AS A SECOND LANGUAGE (“ESL”) CUSTOMERS THAT EXIST IN THE PWD SERVICE TERRITORY BY COMMUNITY, ZIP CODE, CENSUS TRACT, OR OTHER GEOGRAPHIC REGION OR AREA BY WHICH ESL IS TRACKED. SEPARATELY PROVIDE A DETAILED EXPLANATION OF HOW CLUSTERS OF ESL CUSTOMERS ARE IDENTIFIED.

RESPONSE:

There are no documents or reports responsive to this request.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Philadelphia Water Department
PA-II-45. PLEASE PROVIDE A DETAILED DESCRIPTION OF:

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

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

C. THE TRANSLATION SERVICES AVAILABLE WHEN A PERSON CONTACTS PWD THROUGH A WEBBASED SYSTEM.

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

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

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

RESPONSE:

Please see response attachment PA-II-45.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Philadelphia Water Department
PA-II-46. PLEASE PROVIDE A DETAILED DESCRIPTION OF HOW TRANSLATIONS
OF WRITTEN DOCUMENTS PROVIDED TO CUSTOMERS ARE PROVIDED
FOR:
A. CREDIT AND COLLECTION ACTIVITIES (INCLUDING BUT NOT LIMITED
   TO SHUTOFF NOTICES).
B. TAP OUTREACH.
C. DEFERRED PAYMENT PLANS.

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

RESPONSE:

The PWD language access plan is available at:
https://www.phila.gov/media/20170602143450/Philadelphia-Water-Department-LAP-
2017-FINAL.pdf.

The Department of Revenue language access plan is available at:

RESPONSE PROVIDED BY: Water Revenue Bureau and Philadelphia Water Department
PA-II-47. PLEASE IDENTIFY ALL WAYS, IF ANY, IN WHICH IDENTIFIED LOW-INCOME CUSTOMERS ARE TREATED DIFFERENTLY FROM RESIDENTIAL CUSTOMERS WHO ARE NOT IDENTIFIED AS LOW-INCOME, WITH RESPECT TO:

A. THE IMPOSITION, CALCULATION, REFUND OR OTHER TREATMENT OF CASH SECURITY DEPOSITS;
B. SHUTOFFS FOR NONPAYMENT (OTHER THAN SEASONAL PROTECTIONS);
C. SHUTOFF NOTICES (E.G., NUMBER OF, TIMING OF, CONTENT OF, ETC.);
D. SEASONAL NONPAYMENT SHUTOFF PROTECTIONS;
E. LATE PAYMENT CHARGES;
F. DEFERRED PAYMENT ARRANGEMENTS (“DPAS”), INCLUDING DOWNPAYMENTS, MONTHLY INSTALLMENTS, TERMS (IN MONTHS) OR OTHER DPA COMPONENTS OR PROCEDURES;
G. RECONNECTION FEES;
H. COLLECTION FEES (IF ANY) (DISTINGUISH BY TYPE OF FEE IF DISTINCTIONS ARISE FOR MORE THAN ONE FEE);
I. LEVELIZED BUDGET BILLING (INCLUDING NOT ONLY THE MONTHLY BUDGET BILLING BUT ALSO ANY ANNUAL TRUE-UP OR OTHER BUDGET BILLING PROCESS OR COMPONENT).

RESPONSE:

A. PWD does not require security deposit for any of its customers.
B. Low-income customers who are participating in TAP, must have a delinquency of $75 or more to be eligible for shutoff. All other residential customers must have a delinquency of $150 or more to be eligible for shutoff.
C. N/A
D. N/A
E. Low-income customers who are participating in TAP are not charged penalties for late payment. All other residential customers are charged penalties for late payment.

F. Please refer to PWD Reg. 100.9.

G. Reconnection fees are treated as follows:
   1. When a customer first applies for TAP, the reconnection fee is the same.
   2. While a customer is in TAP, they will be reconnected without charge.

H. This question is too vague to formulate a response.

I. PWD does not have levelized budget billing.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne A. Muhammed, Water Revenue Bureau
PA-II-48. FOR EACH ITEM IN THE DATA REQUEST IMMEDIATELY ABOVE, FOR
WHICH DIFFERENCES ARE IDENTIFIED BETWEEN THE TREATMENT OF
IDENTIFIED LOW-INCOME CUSTOMERS AND RESIDENTIAL
CUSTOMERS NOT IDENTIFIED AS LOW-INCOME, PROVIDE A
DETAILED DESCRIPTION OF:

A. THE DEFINITION OF “LOW-INCOME”;
B. THE MEANS BY WHICH A “LOW-INCOME” CUSTOMER IS IDENTIFIED;
C. THE MEANS BY WHICH A CUSTOMER’S LOW-INCOME STATUS IS SEEN
 OR ACCESSED BY A CUSTOMER SERVICE REPRESENTATIVE.

RESPONSE:
A. Please refer to PWD Regulation 206.1(g).
B. Customers are self-identified as low-income through the universal Customer
   Assistance Program application.
C. A customer’s low-income status is an indicator on the main screen of the Basis2
   system. Customer Service Representatives can click on the indicator to see more
detailed information.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne
Muhammed, Water Revenue Bureau
PA-II-49. PLEASE PROVIDE, DATED WITHIN THE PAST FIVE YEARS, A COPY OF
ALL REPORTS, EVALUATIONS, MEMOS, ANALYSES OR OTHER
WRITTEN DOCUMENTS OF ANY NATURE CONTAINING ANY PWD
METHODOLOGY, PROCEDURE OR PROCESS DESIGNED TO
SYSTEMATICALLY REVIEW, STUDY OR ASSESS PWD RESIDENTIAL
BILLING AND/OR PAYMENT RECORDS IN AN EFFORT TO:

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

RESPONSE:

Raftelis has produced two reports that relate to section (a) of this question. The FY 2020
Payment Patterns Report, originally provided in Raftelis’ direct testimony as PWD
Statement No. 6, Schedule RFC-6, and the FY 2020 Low Income Billing & Payments
Report, originally provided in Raftelis’ direct testimony as PWD Statement No. 6,
Schedule RFC-9. Both reports characterize payments within different timeframes against
billings of a particular fiscal year, for categories of customers. No other materials exist
that relate to the requested information.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PLEASE PROVIDE A SINGLE COPY OF ANY REPORT, EVALUATION, STUDY OR OTHER WRITTEN DOCUMENT OF ANY NATURE, WITHIN THE CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED BY OR FOR PWD, DATED WITHIN THE PAST FIVE YEARS, IDENTIFYING, EVALUATING OR OTHERWISE DISCUSSING WHY NONPAYING RESIDENTIAL CUSTOMERS DO NOT MAKE CONTACT WITH THE UTILITY WHEN, IN RESPONSE TO BILL NONPAYMENT, THOSE NONPAYING CUSTOMERS RECEIVE A REQUEST OR NOTICE TO CONTACT A UTILITY TO AVOID THE DISCONNECTION OF SERVICE.

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-51. PLEASE PROVIDE A SINGLE COPY OF ANY REPORT, EVALUATION, STUDY OR OTHER WRITTEN DOCUMENT OF ANY NATURE, WITHIN THE CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED BY OR FOR PWD, DATED WITHIN THE PAST FIVE YEARS, IDENTIFYING, EVALUATING OR OTHERWISE DISCUSSING WHY RESIDENTIAL CUSTOMERS DO NOT SUCCESSFULLY COMPLETE DEFERRED PAYMENT PLANS (SOMETIMES KNOWN AS PAYMENT AGREEMENTS OR OTHER SIMILAR TERMS) IN ORDER TO AVOID THE DISCONNECTION OF SERVICE FOR NONPAYMENT.

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-52. PLEASE PROVIDE BY MONTH SINCE JULY 2017:
   A. THE NUMBER OF TAP CUSTOMERS WHOSE ARREARS PRE-EXISTING
      AS OF THE DATE THEY APPLIED FOR TAP WERE SUFFICIENT TO
      QUALIFY THEM FOR A MUNICIPAL LIEN;
   B. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY ABOVE
      FOR WHOM PWD PERFECTED A LIEN FOR THOSE PREEXISTING
      ARREARS;
   C. THE AGGREGATE DOLLARS OF UNPAID BILLS UNDERLYING THE
      LIENS IDENTIFIED IMMEDIATELY ABOVE;
   D. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY ABOVE
      FOR WHOM THE LIEN BASED ON PRE-EXISTING ARREARS WAS LATER
      SATISFIED BY THE CUSTOMER PAYING THE UNDERLYING DEBT;
   E. THE AGGREGATE DOLLARS OF UNPAID BILLS FOR WHICH THE LIEN
      WAS REMOVED AS HAVING BEEN PAID IN FULL SUBSEQUENT TO THE
      PERFECTION OF THE LIEN;
   F. THE DOLLARS OF FEES CHARGED TO CUSTOMERS WITH THOSE PRE-
      EXISTING DEBTS WHICH CHARGE REFLECTED THE COST OF
      PERFECTING THE LIEN;
   G. THE COST BASIS FOR ANY/ALL CHARGES IMPOSED ON CUSTOMER
      ACCOUNTS ASSOCIATED WITH THE PERFECTION OF THE LIEN;
   H. THE NUMBER OF TAP CUSTOMERS FOR WHOM THE LIENS IDENTIFIED
      IN SUB-PARAGRAPH “B” ABOVE WAS SUBSEQUENTLY CANCELLED
      OR OTHERWISE REMOVED FOR REASONS OTHER THAN THE
      PAYMENT OF THE UNDERLYING DEBT.

RESPONSE:

In response to PA-II-52-G, the charges imposed on customer accounts associated with the
perfection of the lien as the $91.45 filing fee is mandated and set by 42 Pa.C.S. § 1725 et

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-53. PLEASE PROVIDE BY MONTH SINCE JULY 2017:

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

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

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

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

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

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

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

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

In response to PA-II-53-G, the charges imposed on customer accounts associated with the perfection of the lien as the $91.45 filing fee is mandated and set 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.

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-54.  PLEASE PROVIDE A DETAILED DESCRIPTION OF THE POLICY OF PWD (INCLUDING WRB) ON WHETHER OR NOT TO PERFECT A LIEN ON THE UNPAID WATER BILLS OF A TAP PARTICIPANT AS OF:

A. JULY 1, 2016;
B. JULY 1, 2017;
C. JULY 1, 2018
D. JULY 1, 2019
E. JULY 1, 2020.

RESPONSE:

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

RESPONSE PROVIDED BY:  Susan M. Crosby, Water Revenue Bureau and RaVonne Muhammed, Water Revenue Bureau
PA-II-55. IF THERE WAS A CHANGE IN POLICY FROM ONE DATE TO THE NEXT AS IDENTIFIED ABOVE, PLEASE IDENTIFY THE DATE ON WHICH THE POLICY WAS CHANGED, IDENTIFY THE PERSON OR ENTITY MAKING FINAL APPROVAL OF THE CHANGE IN POLICY, AND PROVIDE A DETAILED DESCRIPTION OF THE BASIS FOR THE CHANGE IN POLICY.

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne Muhammed, Water Revenue Bureau
PA-II-56. PLEASE PROVIDE A SINGLE COPY OF ALL COMMUNICATIONS FROM JULY 1, 2017 TO PRESENT TO ALL OR ANY SINGLE MEMBER OF THE PHILADELPHIA CITY COUNCIL REGARDING THE PWD POLICY ON WHETHER TO IMPOSE A LIEN ON TAP ACCOUNTS:
   A. FOR ARREARS THAT WERE PRE-EXISTING AT THE TIME A CUSTOMER BECAME A TAP PARTICIPANT;
   B. FOR ARREARS THAT WERE INCURRED BY A TAP PARTICIPANT SUBSEQUENT TO THEIR ENROLLMENT IN TAP;
   C. FOR A COMBINATION OF ARREARS THAT WERE PRE-EXISTING AND THOSE THAT WERE INCURRED SUBSEQUENT TO TAP ENROLLMENT.

RESPONSE:

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

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne Muhammed, Water Revenue Bureau
PA-II-57. PLEASE PROVIDE, IN AN ACTIVE EXCEL SPREADSHEET WITH ALL
FORMULAE INTACT, CURRENT FOR THE MOST RECENT DATE
POSSIBLE, A LIST OF ALL CURRENT TAP PARTICIPANTS WHO,
SUBSEQUENT TO JULY 1, 2017, HAD A LIEN FILED FOR AN UNPAID
WATER BILL, IDENTIFYING THE FOLLOWING DATA FOR EACH
CUSTOMER:
A. THE TOTAL NUMBER OF LIENS, ALONG WITH THE DATE ON WHICH
THEY WERE FILED, FOR UNPAID WATER BILLS;
B. FOR EACH SEPARATE LIEN, THE AMOUNT OF UNPAID WATER BILL
MADE SUBJECT TO THE LIEN;
C. WHETHER EACH SEPARATE LIEN WAS FOR A PRE-EXISTING
ARREARAGE (I.E., ARREARS EXISTING AT THE TIME THE CUSTOMER
BECAME A TAP PARTICIPANT);
D. WHETHER EACH SEPARATE LIEN WAS FOR AN IN-PROGRAM
ARREARAGES (I.E., ARREARS INCURRED SUBSEQUENT TO BECOMING
A TAP PARTICIPANT);
E. WHETHER THE LIEN WAS SUBSEQUENTLY REMOVED OR OTHERWISE
CANCELLED BECAUSE OF A PAYMENT-IN-FULL OF THE LIENED
AMOUNT;
F. THE DOLLAR AMOUNT OF THE LIEN THAT WAS REMOVED OR
OTHERWISE CANCELLED DUE TO A PAYMENT-IN-FULL OF THE
LIENED AMOUNT;
G. WHETHER THE LIEN WAS SUBSEQUENTLY REMOVED OR OTHERWISE
CANCELLED FOR REASONS OTHER THAN FULL PAYMENT OF THE
LIENED AMOUNT;
H. THE DOLLAR AMOUNT OF THE LIEN THAT WAS REMOVED OR
OTHERWISE CANCELLED FOR REASONS OTHER THAN FULL
PAYMENT OF THE LIENED AMOUNT;
I. WHETHER THE CUSTOMER IS CURRENTLY AN ACTIVE TAP PARTICIPANT;

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

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

RESPONSE:

Regarding PA-II-57-A, since July 1, 2017, ten thousand two hundred and eighty-five (10,285) liens have been filed for TAP participants due to an unpaid water bill.

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
FOR CHARGES IMPOSED ON TAP PARTICIPANTS REFLECTING THE
COST OF PERFECTING A LIEN FOR UNPAID ARREARS PRE-EXISTING
AS OF THE DATE THEY APPLIED FOR TAP, PLEASE EXPLAIN WHETHER
THOSE CHARGES:
A. ARE ADDED TO THE ARREARAGE BALANCE SUBJECT TO ARREARAGE
   FORGIVENESS;
B. ARE ADDED TO THE BILL FOR CURRENT SERVICE OVER AND ABOVE
   THE BILL FOR CURRENT SERVICE;
C. ARE TREATED IN SOME OTHER FASHION (PLEASE PROVIDE A
   DETAILED EXPLANATION OF THAT TREATMENT).

RESPONSE:
C. Once pre-TAP debts are forgiven, any lien fees associated with that debt will be
   forgiven. However, if a participant entered the TAP program prior to the lien program
   being run for that cycle, the debt would not have been liened until January 2020.
   Therefore, the resulting fee from this lien would appear on the customer’s bill. Finally, if a
   participant accrues TAP debt eligible to be liened, the resulting fee would appear on the
   customer’s bill once the lien is filed.

RESPONSE PROVIDED BY:  Susan M. Crosby, Water Revenue Bureau and RaVonne
Muhammed, Water Revenue Bureau
PA-II-59. PLEASE PROVIDE A DETAILED DESCRIPTION OF THE STATUTORY
INTEREST CHARGED, IF AT ALL, ON DOLLARS OF UNPAID BILLS PRE-
EXISTING AS OF THE DATE A TAP PARTICIPANT APPLIED FOR TAP
SUBJECT TO A LIEN.

RESPONSE:

PWD does not charge interest.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-60. FOR THE DOLLARS OF STATUTORY INTEREST CHARGED, IF AT ALL,
ON DOLLARS OF UNPAID BILLS PREEXISTING AS OF THE DATE A TAP
PARTICIPANT APPLIED FOR TAP, PLEASE EXPLAIN WHETHER THOSE
CHARGES:

A. ARE ADDED TO THE ARREARAGE BALANCE SUBJECT TO
   FORGIVENESS;
B. ARE ADDED TO THE BILL FOR CURRENT SERVICE OVER AND ABOVE
   THE BILL FOR CURRENT SERVICE;
C. ARE TREATED IN SOME OTHER FASHION (PLEASE PROVIDE A
   DETAILED EXPLANATION OF THAT TREATMENT).

RESPONSE:
Please see response to PA-II-59.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-61. PLEASE PROVIDE A DETAILED DESCRIPTION OF THE EXTENT TO WHICH CHARGES ASSOCIATED WITH A PWD LIEN FOR UNPAID ARREARS PRE-EXISTING AS OF THE DATE THE TAP PARTICIPANT APPLIED FOR TAP, WOULD BE RECOVERED THROUGH PWD’S UNIVERSAL SERVICE RIDER:

A. IF THE CHARGES ARE COMPRISED OF THE COST OF FILING OR PERFECTING THE LIEN;

B. IF THE CHARGES ARE COMPRISED OF STATUTORY INTEREST CHARGED ON THE ARREARS SUBJECT TO THE LIEN.

RESPONSE:

PWD does not have a universal service rider. This following response is provided in context of the current TAP Rate Rider.

A. Once pre-TAP arrears are forgiven, any lien fees for pre-TAP debt that was liened will be forgiven; therefore, there would be no recovery through PWD’s Tiered Assistance Program Rate Rider.

B. PWD does not charge interest; therefore, there would be no recovery through PWD’s Tiered Assistance Program Rate Rider.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Melissa La Buda, Philadelphia Water Department.
PA-II-62. PLEASE PROVIDE BY MONTH SINCE JULY 2017:

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

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

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

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

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

F. THE DOLLARS OF FEES CHARGED TO CUSTOMERS WITH THOSE PRE-EXISTING DEBTS WHICH CHARGE REFLECTED THE COST OF PERFECTING OF THE LIEN;

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

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

RESPONSE:

In response to PA-II-62-G, the charges imposed on customer accounts associated with the perfection of the lien as the $91.45 filing fee is mandated and set by 42 Pa.C.S. § 1725 et

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-II-63. PLEASE PROVIDE A DETAILED DESCRIPTION OF ANY CURRENT
POLICY OF PWD ON WHETHER OR NOT TO PERFECT A LIEN ON THE
UNPAID BILLS OF A TAP PARTICIPANT:
A. FOR ARREARS PRE-EXISTING AT THE TIME OF TAP ENROLLMENT;
B. FOR IN-PROGRAM TAP ARREARS.

RESPONSE:
Please see responses to PA-II-48 and PA-II-54 for difference between TAP participants
and non-participants. Additionally, PWD does not distinguish between pre-TAP or in-
program arrears when placing a lien on a property.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne A.
Muhammed, Water Revenue Bureau
PA-II-64. PLEASE PROVIDE A DETAILED EXPLANATION OF:

A. WHETHER PWD ACCEPTS PAYMENTS TO RETIRE LIENS THAT HAVE BEEN PLACED BASED ON ARREARS THAT HAVE BEEN FROZEN AS BEING PRE-PROGRAM ARREARS FOR TAP PARTICIPANTS BUT THAT HAVE NOT YET BEEN FORGIVEN.

B. IF SUCH PAYMENTS ARE RECEIVED, PROVIDE AN ADDITIONAL DETAILED EXPLANATION OF HOW THOSE PAYMENTS ARE TREATED ONCE FORGIVENESS HAS BEEN EARNED. FOR EXAMPLE, ARE THOSE PAYMENTS REFUNDED, OR ARE THE ARREARS SUBJECT TO FORGIVENESS REDUCED BY THE AMOUNT OF THE PAYMENT, OR ARE THOSE REVENUES TREATED IN SOME OTHER FASHION?

RESPONSE:

A. PWD does accept payments to retire liens.

B. These revenues are treated in some other fashion. Any monies received will be first applied to any outstanding TAP balance that remains due and the remainder will be credited to the account and used towards future TAP payments. See also Philadelphia Code §19-1605 (Limitation on Action to Enforce Collection; Income-Based Water Rate Assistance Program).

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne A. Muhammed, Water Revenue Bureau
PA-II-65. PLEASE PROVIDED A DETAILED EXPLANATION OF:

A. WHETHER PWD PLACES A LIEN ON UNPAID ARREARS OF ACTIVE TAP PARTICIPANTS WHEN THOSE ARREARS ARE SUBJECT TO POTENTIAL FUTURE FORGIVENESS;

B. IF PWD DOES PLACE A LIEN ON UNPAID ARREARS OF ACTIVE TAP PARTICIPANTS WHEN THOSE ARREARS ARE SUBJECT TO FORGIVENESS, THE TREATMENT OF THOSE LIENS WHEN AND TO THE EXTENT THAT ARREARAGE FORGIVENESS OF THE ARREARS SUBJECT TO THE LIEN IS EARNED.

RESPONSE:

A. Please see response to PA-II-54.

B. When the debt is forgiven, the liens are vacated.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne A. Muhammed, Water Revenue Bureau
PA-II-66. BY MONTH FOR EACH MONTH JULY 2017 TO PRESENT, PLEASE PROVIDE:

A. THE NUMBER OF RESIDENTIAL ACCOUNTS THAT WERE CHARGED BOTH A STATUTORY INTEREST CHARGE ON A LIEN FOR AN OUTSTANDING ARREARS AND A LATE FEE PURSUANT TO PWD TARIFF;

B. THE AGGREGATED DOLLARS CHARGED TO RESIDENTIAL ACCOUNTS THAT WERE CHARGED BOTH AN INTEREST CHARGE ON A LIEN FOR AN OUTSTANDING ARREARS AND A LATE FEE PURSUANT TO PWD TARIFF.

RESPONSE:

PWD does not charge interest nor does it charge a late fee.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau