

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

**Dated: February 2021**

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**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

1 **PA-II-2.** WHEN A CUSTOMER CONTACTS PWD REQUESTING A VOLUNTARY  
2 RELINQUISHMENT OF SERVICE TO A RESIDENTIAL PROPERTY, DOES  
3 PWD INQUIRE IF THE SERVICE ADDRESS IS OCCUPIED EXCLUSIVELY  
4 BY THE OWNER/RATEPAYER OR BY TENANTS? PLEASE PROVIDE A  
5 COPY OF ANY WRITTEN DOCUMENTS, LETTERS, FORMS, OR CALL  
6 SCRIPTS WHERE THIS INFORMATION IS REQUIRED OR REQUESTED.  
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8 **RESPONSE:**

9 No, therefore there are no documents responsive to this request.  
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11 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-3.** DOES PWD REQUIRED OR PROVIDE AN AFFIDAVIT FOR USE BY A  
2 LANDLORD RATEPAYER REQUESTING VOLUNTARY  
3 RELINQUISHMENT OF SERVICE TO A RESIDENTIAL PROPERTY  
4 CERTIFYING THAT NO TENANTS OCCUPY THE PROPERTY? PROVIDE A  
5 COPY OF ANY AFFIDAVITS OR OTHER WRITTEN DOCUMENTS,  
6 LETTERS, OR FORMS USED, CURRENTLY IN USE AND/OR DEVELOPED  
7 FOR POSSIBLE USE BY PWD.

8  
9 **RESPONSE:**

10 No, therefore there are no documents responsive to this request.  
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12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-4.** PLEASE DESCRIBE ANY AND ALL LEGAL ACTION TAKEN BY PWD  
2 WITHIN THE PAST FIVE (5) YEARS, TO OBTAIN FROM A LANDLORD  
3 RATE PAYER THE NAMES AND ADDRESSES OF TENANTS OCCUPYING  
4 RESIDENTIAL PROPERTY TO WHICH SERVICE IS BEING  
5 DISCONTINUED?  
6

7 **RESPONSE:**

8 No legal action has been taken over the last five years to obtain the names and addresses  
9 of tenants occupying residential property to which service is being discontinued.  
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11 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-5.** WITHIN THE PAST FIVE (5) YEARS, HOW MANY REQUESTS FOR THE  
2 NAMES AND ADDRESSES OF TENANTS OCCUPYING A RESIDENTIAL  
3 PROPERTY HAVE BEEN MADE BY PWD?

4 A. WHAT IS THE PROCEDURE FOR REQUESTING THAT INFORMATION?

5 B. PROVIDE COPIES OF ANY LETTERS AND FORMS USED TO OBTAIN  
6 THIS INFORMATION.

7  
8 **RESPONSE:**

9 None

10 A. Prior to shut-off, a notice is sent to the landlord requesting the names of tenants.

11 Please refer to PWD Regulation 100.5(b).

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

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

1 **PA-II-7.** PROVIDE A COPY OF THE NOTICE PROVIDED TO LANDLORD  
2 RATEPAYERS PRIOR TO DISCONTINUANCE OF SERVICE TO A  
3 PROPERTY LIKELY TO BE OCCUPIED BY “USTRA TENANTS.”  
4

5 **RESPONSE:**

6 Please see response attachment PA-II-5. Also, please see response attachment PA-II-7.  
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8 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-8.** DOES PWD NOTIFY ANY MUNICIPAL DEPARTMENT REGARDING  
2 DISCONTINUANCE OF SERVICE TO A RESIDENTIAL PROPERTY?

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

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

9  
10 **RESPONSE:**

11 The only department notified is WRB.

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

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

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

10 **RESPONSE:**

11 Please see response to PA-II-7. The USTRA notice provided specifically mentions the  
12 Pennsylvania Utility Service Tenants Rights Act and directs landlords to identify any  
13 tenants that will be affected by a water shutoff whereas a standard shut-off notice contains  
14 information directing tenants who are not responsible for the water bill through the rental  
15 agreement to contact the PWD Customer Contact Center.  
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17 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-10.** HOW DOES PWD PROVIDE NOTICE TO “USTRA TENANTS” AND TO  
2 PROPERTIES OCCUPIED OR LIKELY TO BE OCCUPIED BY “USTRA  
3 TENANTS”?  
4

5 **RESPONSE:**

6 See response to PA-II-9.  
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8 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-11.** WHAT DOES PWD CONSIDER WHEN DETERMINING WHETHER IT A  
2 RESIDENTIAL PROPERTY IS “REASONABLY LIKELY TO BE OCCUPIED”  
3 BY AN USTRA TENANT? PLEASE EXPLICITLY IDENTIFY ANY SPECIFIC  
4 FACTORS OR INDICATORS RELIED ON BY PWD TO MAKE SUCH A  
5 DETERMINATION, AND PROVIDE A COPY OF ANY WRITTEN  
6 DOCUMENT, TRAINING MATERIALS, LETTER, OR MEMORANDA  
7 DESCRIBING THIS POLICY.

8  
9 **RESPONSE:**

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

14  
15 There are no documents responsive to this request.

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

7  
8 **RESPONSE:**

9 Yes, the top portion of every shut-off notice contains information regarding USTRA  
10 Tenant rights. There is also information available on the Department of Revenue website  
11 at <https://www.phila.gov/2018-10-16-ustra-helps-philly-renters-maintain-water-service/>.

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13 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-13.** DESCRIBE THE PROCEDURE TAKEN BY PWD WHEN A PERSON  
2 NOTIFIES PWD THAT HE/SHE IS A TENANT AND LIVES AT A  
3 RESIDENCE THAT IS SCHEDULED FOR DISCONTINUANCE OF SERVICE  
4 BUT WAS NOT PROVIDED NOTICE OF A TENANT’S RIGHTS TO  
5 CONTINUE OR RESUME SERVICE UNDER USTRA.  
6

7 **RESPONSE:**

8 Tenants are provided notice of a tenant’s rights to continue or resume service under  
9 USTRA on the disconnection notice. Please see response attachment PA-II-7.  
10

11 Further, when a tenant contacts PWD and/or WRB regarding service disconnection that  
12 does not have permission in their lease or from the owner to put the water bill in their  
13 name and the water is about to be shut-off due to non-payment, customer service  
14 representatives inform customers about their rights under USTRA. The representatives  
15 then process the tenant into the USTRA program upon the tenant’s request.  
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17 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-14.** DESCRIBE THE PROCESS “USTRA TENANTS” MUST TAKE TO APPLY TO  
2 HAVE UTILITY SERVICE CONTINUED OR RESUMED TO A PROPERTY IN  
3 WHICH SERVICE WAS DISCONTINUED DUE TO A LANDLORD  
4 RATEPAYER’S FAILURE TO PAY THE BILL?

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

7 B. PROVIDE ANY AFFIDAVITS USED, CURRENTLY IN USE AND/OR  
8 DEVELOPED FOR POSSIBLE USE BY PWD FOR “USTRA TENANTS”  
9 SEEKING TO APPLY FOR UTILITY SERVICE TO BE CONTINUED OR  
10 RESUMED TO A PREMISES IN WHICH SERVICE WAS DISCONTINUED  
11 DUE TO A LANDLORD RATEPAYER’S FAILURE TO PAY THE BILL.  
12

13 **RESPONSE:**

14 Tenants must reach out to WRB and inform staff they are a tenant and the water is  
15 about to be shut-off for non-payment. At that time, their rights will be explained to  
16 them and they will be added as an USTRA tenant.  
17

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

20 B. There are no documents responsive to this request.  
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22 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-15.** DOES PWD REQUIRE THAT “USTRA TENANTS” PUT SERVICE INTO  
2 THEIR NAME OR OTHERWISE ASSUME FINANCIAL RESPONSIBILITY  
3 FOR ANY PORTION OF THE BILL TO THE RESIDENCE? IN ANSWERING  
4 THIS QUESTION, PLEASE SPECIFICALLY DESCRIBE THE FINANCIAL  
5 LIABILITY WHICH MUST BE ASSUMED BY AN USTRA TENANT.  
6

7 **RESPONSE:**

8 Please refer to PWD Regulation 100.3 - “USTRA Tenant Rights.”  
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10 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-16.** PROVIDE A COPY OF THE NOTICE OR NOTICES USED BY PWD TO  
2 NOTIFY “USTRA TENANTS” OF THE AMOUNT DUE FOR EACH  
3 SUCCEEDING PERIOD AFTER THEY ELECT TO CONTINUE OR RESUME  
4 SERVICE AND MAKE AN INITIAL PAYMENT. HOW OFTEN IS THIS  
5 NOTICE ISSUED?  
6

7 **RESPONSE:**

8 See response attachment PA-II-16 USTRA Tenant Bill. Our vendor, Revenue Collections  
9 Bureau (“RCB”), sends a notice to the tenant every thirty (30) days with the amount due  
10 that month.  
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12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-17.** DOES PWD REFUND PAYMENTS MADE BY “USTRA TENANTS” WHEN  
2 THE TENANT HAS ELECTED TO CONTINUE OR RESUME SERVICE  
3 UNDER USTRA/SECTION 1521 ET AL. OF THE PUBLIC UTILITY CODE  
4 AND MADE SOME PAYMENT, BUT FAILS TO SATISFY THE  
5 REQUIREMENTS OF CONTINUED SERVICE LEADING TO  
6 TERMINATION?

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

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

11 C. DESCRIBE THE PROCEDURES PWD USES TO ISSUE THESE REFUNDS.  
12

13 **RESPONSE:**

14 The City is in compliance with all its obligations under USTRA.  
15

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

17 B. WRB relies on tenant to self-identify.

18 C. See response attachment PA-II-17-C Refund Petition.  
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20 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-18.** DESCRIBE THE TRAINING PROVIDED TO CUSTOMER SERVICE  
2 REPRESENTATIVES REGARDING THE RIGHTS OF “USTRA TENANTS.”  
3

4 **RESPONSE:**

5 See response attachment PA-II-18 USTRA Training Documents.  
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7 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-19.** PROVIDE ANY TRAINING MATERIAL, HANDBOOKS OR OTHER  
2 WRITTEN DOCUMENTS USED IN TRAINING STAFF ON THIS SUBJECT.  
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4 **RESPONSE:**

5 Please see response to PA-II-18.  
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7 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-20.** PLEASE PROVIDE A TEMPLATE COPY OF ANY AND ALL COLLECTION  
2 NOTICES SENT TO RESIDENTIAL CUSTOMERS, INCLUDING ANY  
3 TERMINATION NOTICE OR NOTICES THAT PWD PROVIDES TO “USTRA  
4 TENANTS.”

5  
6 **RESPONSE:**

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

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9 **RESPONSE PROVIDED BY:** Water Revenue Bureau

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1 **PA-II-21.** WHAT STEPS DOES PWD TAKE TO DETERMINE WHETHER A  
2 DWELLING UNIT IS TENANT OCCUPIED PRIOR TO TERMINATING  
3 SERVICE?  
4

5 **RESPONSE:**

6 Please see responses to PA-II-11 and PA-II-13. If a customer informs the PWD staff  
7 member performing the termination of service that they are a new tenant in the property,  
8 service to the property will not be terminated.  
9

10 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia Water  
11 Department  
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- 1 **PA-II-22.** WHEN A “USTRA TENANT” HAS EXERCISED THEIR RIGHT TO  
2 CONTINUED SERVICE:  
3 A. WHAT IS THE INITIAL AMOUNT THEY NEED TO PAY TO CONTINUE  
4 SERVICE?  
5 B. HOW DOES PWD DETERMINE THE FUTURE MONTHLY PAYMENTS  
6 REQUIRED TO CONTINUE SERVICE?  
7 C. HOW IS THE TENANT NOTIFIED OF THE MONTHLY AMOUNT THEY  
8 MUST PAY?  
9

10 **RESPONSE:**

- 11 A. Please refer to 68 P.S. § 399.7 “Rights of tenants to continued service” as well as  
12 PWD Regulation 100.3 “USTRA Tenant Rights.”  
13 B. Please refer to 68 P.S. § 399.7 “Rights of tenants to continued service” as well as  
14 PWD Regulation 100.3 “USTRA Tenant Rights.”  
15 C. Please see response to PA-II-16.  
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17 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia Water  
18 Department  
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1 **PA-II-23.** HOW OFTEN DOES PWD PERFORM ACTUAL METER READINGS?  
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3 **RESPONSE:**

4 Meter readings are performed on approximately a monthly basis.  
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6 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia Water  
7 Department  
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1 **PA-II-24.** HOW OFTEN DOES PWD PERFORM ESTIMATED METER READINGS? IF  
2 ESTIMATED METER READINGS ARE NOT PERFORMED ON A  
3 PREDETERMINED PERIODIC BASIS, PLEASE EXPLAIN THE  
4 CIRCUMSTANCES IN WHICH PWD PERFORMS AN ESTIMATED METER  
5 READING INSTEAD OF AN ACTUAL METER READING, AND THE  
6 MAXIMUM NUMBER OF MONTHS IT WILL CONTINUE TO PERFORM AN  
7 ESTIMATED READING.

8  
9 **RESPONSE:**

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

13  
14 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia Water  
15 Department

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**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

1 **PA-II-26.** IN WHAT ORDER DOES PWD APPLY CUSTOMER PAYMENTS,  
2 INCLUDING BUT NOT LIMITED TO CURRENT WATER AND/OR  
3 WASTEWATER CHARGES, PAYMENT ARRANGEMENTS, PAST-DUE  
4 WATER AND/OR WASTEWATER CHARGES, LATE FEES, COLLECTIONS  
5 FEES, TURN-ON FEES, ETC.? PLEASE DESCRIBE PWD'S PAYMENT  
6 POSTING POLICY IN DETAIL, AND PROVIDE A COPY OF ANY WRITTEN  
7 DOCUMENTS OR WORKPAPERS WHICH DESCRIBE OR OUTLINE ITS  
8 PAYMENT POSTING POLICY.  
9

10 **RESPONSE:**

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

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

26  
27 Additionally, when there is an active payment agreement on an account, Basis2 looks at  
28 transactions covered in a payment agreement as a collective entity. It does not look at the

1 individual transactions' payment due dates; rather, it refers to the payment agreement's  
2 schedule of payments.  
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5 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Henrietta  
6 Locklear, Raftelis Financial Consultants  
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1 **PA-II-27.** IF A CUSTOMER PAYS FOR WATER AND WASTEWATER CHARGES  
2 WITH A SINGLE CHECK, AND THAT CHECK IS RETURNED, IS THE  
3 CUSTOMER ASSESSED A RETURN CHECK CHARGE UNDER BOTH THE  
4 WATER AND WASTEWATER TARIFFS? IF YES, PLEASE PROVIDE A  
5 JUSTIFICATION FOR THE DUPLICATE FEES?  
6

7 **RESPONSE:**

8 No, they are not assessed duplicate fees.  
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10 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-28.** IF A CUSTOMER’S NONPAYMENT OF BOTH WATER AND  
2 WASTEWATER SERVICE RESULTS IN COLLECTIONS AND/OR  
3 ENFORCEMENT ACTIONS IS THE CUSTOMER CHARGED FOR RELATED  
4 FEES UNDER BOTH THE WATER AND WASTEWATER TARIFFS? IF YES,  
5 PLEASE PROVIDE A JUSTIFICATION FOR THE DUPLICATION OF COSTS.  
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7 **RESPONSE:**

8 No, they are not assessed duplicate charges.  
9

10 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-29.** IF A CUSTOMER REQUESTS HISTORICAL BILLING OR IS SET A FINAL  
2 BILL FOR WATER AND WASTEWATER SERVICE, ARE THEY CHARGED  
3 THE ASSOCIATED CHARGES AND FEES UNDER BOTH THE WATER  
4 AND WASTEWATER TARIFFS? IF YES, PLEASE PROVIDE A  
5 JUSTIFICATION FOR THE DUPLICATION OF COSTS.  
6

7 **RESPONSE:**

8 There are no charges for billing histories, also known as account statements. PWD does  
9 not issue “final bills.”  
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11 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-30.** 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 response attachment PA-II-30 Payment Channel Number Report.  
9

10 Please note that from fiscal year 2017 through December 31, 2020, credit/debit card  
11 payments were not reported separately, but as part of online payments.  
12

13 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-31.** 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 response attachment PA-II-31 Payment Channel Dollar Report.  
7 Please note that from fiscal year 2017 through December 31, 2020, credit/debit card  
8 payments were not reported separately, but as part of online payments.  
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11 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-32.** 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 MECHANISMS: CASH, CHECK, DEBIT CARD,  
5 CREDIT CARD, ACH CREDIT, ACH DEBIT, PREPAID EBT CARDS,  
6 MOBILE APP.

7  
8 **RESPONSE:**

9 See response attachment PA-II-32 Payment Type Number Report.

10  
11 Payments made through “MyPhillyWaterBill,” our electronic payment website operated  
12 by Kubra, are captured in the following entries: ACH, ECK, IVR, and WEB. Payments  
13 from collection agencies could have been made via any method the agency allows, but we  
14 do not receive information about those payment methods.

15  
16

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

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1 2 3 4 5 6 7 8 9 10 11 12	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
	ZC	ZipCheck, automated direct debit via PNC Bank
	ZP	ZipPhone, automated bank debit from customer's bank and/or third party pay station

13 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-33.** 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 response attachment PA-II-33 Payment Type Dollar Report. Payments made through  
7 “MyPhillyWaterBill,” our electronic payment website operated by Kubra, are captured in  
8 the following entries: ACH, ECK, IVR, and WEB. Payments from collection agencies  
9 could have been made via any method the agency allows, but we do not receive  
10 information about those payment methods.  
11

12 Payment Type	13 Definition
14 ACH	Automated Clearing House (wire transfer) includes all wire transfer transactions and is not broken down into debit or credit.
16 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
18 ECK	Electronic Check payment via City's web-based payment portal including but not limited to the Mobile App
20 IVR	Interactive Voice Response (payment by phone) includes credit/debit card and prepaid EBT card payments but cannot be broken down into those categories
22 OTHER	Sheriff Sale payments, Field Service Representative collected payments, and bulk receipts.
24 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
26 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
28 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 3 4 5 6 7 8	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 6	ZC	ZipCheck, automated direct debit via PNC Bank
7 8	ZP	ZipPhone, automated bank debit from customer's bank and/or third party pay station

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

1 **PA-II-34.** 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 vendor. 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:** Susan M. Crosby, Water Revenue Bureau  
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**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

1 **PA-II-36.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE RATEMAKING  
2 TREATMENT OF THE REVENUE REPORTED IN QUESTION #5 ABOVE.  
3

4 **RESPONSE:**

5 Question PA-II-5 and the associated response did not relate to the subject matter  
6 referenced in the question above (i.e. treatment of revenues for ratemaking purposes).  
7

8 There are no revenues reported in response to PA-II-5. Therefore, there is no ratemaking  
9 treatment.  
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11 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Black & Veatch  
12 Management Consulting, LLC.  
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1 **PA-II-37.** PLEASE PROVIDE A DETAILED COST BASIS FOR THE \$3.95  
2 RESIDENTIAL FEE FOR CREDIT AND DEBIT CARD TRANSACTIONS.  
3

4 **RESPONSE:**

5 The transaction fee is governed by the terms of the contract with the vendor. Additionally,  
6 please see response to PA-II-34.  
7

8 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-38.** 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 PWD as such there is no lost revenue. Additionally, please note that the  
9 residential debit/credit card transaction fee was lowered from \$3.95 to \$2.95 in October  
10 2019.

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12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-39.** 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.  
7

8 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-40.** PLEASE PROVIDE A COMPREHENSIVE LIST OF REGULATED  
2 PENNSYLVANIA UTILITIES THAT DO NOT CHARGE A FEE FOR  
3 CREDIT/DEBIT CARD TRANSACTIONS.  
4

5 **RESPONSE:**

6 There are no documents or reports responsive to this request.  
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8 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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**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

1 **PA-II-42.** PLEASE PROVIDE A SINGLE COPY OF THE LANGUAGE ACCESS PLAN  
2 SUBMITTED BY PWD TO THE CITY OF PHILADELPHIA.

3  
4 **RESPONSE:**

5 The language access plan can be found online at:

6 [https://www.phila.gov/media/20170602143450/Philadelphia-Water-Department-LAP-](https://www.phila.gov/media/20170602143450/Philadelphia-Water-Department-LAP-2017-FINAL.pdf)  
7 [2017-FINAL.pdf.](https://www.phila.gov/media/20170602143450/Philadelphia-Water-Department-LAP-2017-FINAL.pdf)

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9 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-II-43.** IF PWD ASSERTS THAT IT IS EXEMPT FROM, OR NOT SUBJECT TO,  
2 PHILADELPHIA'S LOCAL ORDINANCE REQUIRING THE PREPARATION  
3 AND SUBMISSION OF A LANGUAGE ACCESS PLAN, PLEASE PROVIDE  
4 A DETAILED EXPLANATION OF THE BASIS FOR THAT ASSERTION.  
5

6 **RESPONSE:**

7 PWD is not exempt.  
8

9 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-II-44.** 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 There are no documents or reports responsive to this request.  
10

11 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia Water  
12 Department  
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- 1 **PA-II-45.** 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 WEBBASED SYSTEM.
- 9 D. HOW A PERSON ACCESSES THE TRANSLATION SERVICE WHEN A
- 10 PERSON CONTACTS PWD THROUGH AN AUTOMATED OR
- 11 INTERACTIVE TELEPHONE SYSTEM.
- 12 E. HOW A PERSON ACCESSES THE TRANSLATION SERVICE WHEN A
- 13 PERSON CONTACTS PWD THROUGH A HUMAN INTERACTION.
- 14 F. HOW A PERSON ACCESSES THE TRANSLATIONS SERVICE WHEN A
- 15 PERSON CONTACTS PWD THROUGH A WEB-BASED SYSTEM.
- 16

17 **RESPONSE:**

18 Please see response attachment PA-II-45.

19

20 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia  
21 Water Department

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1 **PA-II-46.** 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 LIMITED  
5 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 The PWD language access plan is available at:

16 [https://www.phila.gov/media/20170602143450/Philadelphia-Water-Department-LAP-  
17 2017-FINAL.pdf](https://www.phila.gov/media/20170602143450/Philadelphia-Water-Department-LAP-2017-FINAL.pdf).

18  
19 The Department of Revenue language access plan is available at:

20 <https://www.phila.gov/media/20170602143453/Revenue-LAP-Final-2017.pdf>.

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22 **RESPONSE PROVIDED BY:** Water Revenue Bureau and Philadelphia Water Department  
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- 1 **PA-II-47.** PLEASE IDENTIFY ALL WAYS, IF ANY, IN WHICH IDENTIFIED LOW-  
2 INCOME CUSTOMERS ARE TREATED DIFFERENTLY FROM  
3 RESIDENTIAL CUSTOMERS WHO ARE NOT IDENTIFIED AS LOW-  
4 INCOME, WITH RESPECT TO:
- 5 A. THE IMPOSITION, CALCULATION, REFUND OR OTHER TREATMENT OF  
6 CASH SECURITY DEPOSITS;
  - 7 B. SHUTOFFS FOR NONPAYMENT (OTHER THAN SEASONAL  
8 PROTECTIONS);
  - 9 C. SHUTOFF NOTICES (E.G., NUMBER OF, TIMING OF, CONTENT OF, ETC.);
  - 10 D. SEASONAL NONPAYMENT SHUTOFF PROTECTIONS;
  - 11 E. LATE PAYMENT CHARGES;
  - 12 F. DEFERRED PAYMENT ARRANGEMENTS (“DPAS”), INCLUDING  
13 DOWNPAYMENTS, MONTHLY INSTALLMENTS, TERMS (IN MONTHS)  
14 OR OTHER DPA COMPONENTS OR PROCEDURES;
  - 15 G. RECONNECTION FEES;
  - 16 H. COLLECTION FEES (IF ANY) (DISTINGUISH BY TYPE OF FEE IF  
17 DISTINCTIONS ARISE FOR MORE THAN ONE FEE);
  - 18 I. LEVELIZED BUDGET BILLING (INCLUDING NOT ONLY THE MONTHLY  
19 BUDGET BILLING BUT ALSO ANY ANNUAL TRUE-UP OR OTHER  
20 BUDGET BILLING PROCESS OR COMPONENT).

21  
22 **RESPONSE:**

- 23 A. PWD does not require security deposit for any of its customers.
- 24 B. Low-income customers who are participating in TAP, must have a delinquency of \$75  
25 or more to be eligible for shutoff. All other residential customers must have a  
26 delinquency of \$150 or more to be eligible for shutoff.
- 27 C. N/A
- 28 D. N/A

1 E. Low-income customers who are participating in TAP are not charged penalties for late  
2 payment. All other residential customers are charged penalties for late payment.

3 F. Please refer to PWD Reg. 100.9.

4 G. Reconnection fees are treated as follows:

5 1. When a customer first applies for TAP, the reconnection fee is the same.

6 2. While a customer is in TAP, they will be reconnected without charge.

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

8 I. PWD does not have levelized budget billing.

9  
10 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne A.  
11 Muhammed, Water Revenue Bureau

1 **PA-II-48.** FOR EACH ITEM IN THE DATA REQUEST IMMEDIATELY ABOVE, FOR  
2 WHICH DIFFERENCES ARE IDENTIFIED BETWEEN THE TREATMENT OF  
3 IDENTIFIED LOW-INCOME CUSTOMERS AND RESIDENTIAL  
4 CUSTOMERS NOT IDENTIFIED AS LOW-INCOME, PROVIDE A  
5 DETAILED DESCRIPTION OF:  
6 A. THE DEFINITION OF “LOW-INCOME”;  
7 B. THE MEANS BY WHICH A “LOW-INCOME” CUSTOMER IS IDENTIFIED;  
8 C. THE MEANS BY WHICH A CUSTOMER’S LOW-INCOME STATUS IS SEEN  
9 OR ACCESSED BY A CUSTOMER SERVICE REPRESENTATIVE.

10  
11 **RESPONSE:**

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

18  
19 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne  
20 Muhammed, Water Revenue Bureau

1 **PA-II-49.** PLEASE PROVIDE, DATED WITHIN THE PAST FIVE YEARS, A COPY OF  
2 ALL REPORTS, EVALUATIONS, MEMOS, ANALYSES OR OTHER  
3 WRITTEN DOCUMENTS OF ANY NATURE CONTAINING ANY PWD  
4 METHODOLOGY, PROCEDURE OR PROCESS DESIGNED TO  
5 SYSTEMATICALLY REVIEW, STUDY OR ASSESS PWD RESIDENTIAL  
6 BILLING AND/OR PAYMENT RECORDS IN AN 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 relate to section (a) of this question. The FY 2020  
15 Payment Patterns Report, originally provided in Raftelis' direct testimony as PWD  
16 Statement No. 6, Schedule RFC-6, and the FY 2020 Low Income Billing & Payments  
17 Report, originally provided in Raftelis' direct testimony as PWD Statement No. 6,  
18 Schedule RFC-9. Both reports characterize payments within different timeframes against  
19 billings of a particular fiscal year, for categories of customers. No other materials exist  
20 that relate to the requested information.

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22 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**PA-II-50.** 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

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**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



1 **PA-II-52.** PLEASE PROVIDE BY MONTH SINCE JULY 2017:

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

25  
26 **RESPONSE:**

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

1 seq., 42 Pa.C.S. § 3733, 72 P.S. § 3172, and First Judicial District of Pennsylvania  
2 Administrative Order 2008-01.

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

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

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

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**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

1 **PA-II-54.** 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, 2016;
- 5 B. JULY 1, 2017;
- 6 C. JULY 1, 2018
- 7 D. JULY 1, 2019
- 8 E. JULY 1, 2020.

9  
10 **RESPONSE:**

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

17  
18 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne  
19 Muhammed, Water Revenue Bureau

1 **PA-II-55.** 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 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne  
13 Muhammed, Water Revenue Bureau  
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1 **PA-II-56.** 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 CUSTOMER  
6 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 AND  
10 THOSE THAT WERE INCURRED SUBSEQUENT TO TAP ENROLLMENT.  
11

12 **RESPONSE:**

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

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

19 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne  
20 Muhammed, Water Revenue Bureau  
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1 **PA-II-57.** 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 TAP PARTICIPANTS WHO,  
4 SUBSEQUENT TO JULY 1, 2017, HAD A LIEN FILED FOR AN UNPAID  
5 WATER BILL, IDENTIFYING THE FOLLOWING DATA FOR EACH  
6 CUSTOMER:

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

9 B. FOR EACH SEPARATE LIEN, THE AMOUNT OF UNPAID WATER BILL  
10 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 CUSTOMER  
13 BECAME A TAP PARTICIPANT);

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

17 E. WHETHER THE LIEN WAS SUBSEQUENTLY REMOVED OR OTHERWISE  
18 CANCELLED BECAUSE OF A PAYMENT-IN-FULL OF THE LIENED  
19 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 OTHERWISE  
24 CANCELLED FOR REASONS OTHER THAN FULL PAYMENT OF THE  
25 LIENED AMOUNT;

26 H. THE DOLLAR AMOUNT OF THE LIEN THAT WAS REMOVED OR  
27 OTHERWISE CANCELLED FOR REASONS OTHER THAN FULL  
28 PAYMENT OF THE LIENED AMOUNT;



- 1 I. WHETHER THE CUSTOMER IS CURRENTLY AN ACTIVE TAP  
2 PARTICIPANT;  
3 J. WHETHER THE CUSTOMER IS CURRENTLY AN ACTIVE PWD  
4 CUSTOMER, BUT NOT CURRENTLY AN ACTIVE TAP PARTICIPANT;  
5 K. WHETHER THE CUSTOMER WAS DISCONNECTED FOR NONPAYMENT  
6 SUBSEQUENT TO THE DATE ON WHICH A LIEN WAS PLACED.  
7

8 **RESPONSE:**

9 Regarding PA-II-57-A, since July 1, 2017, ten thousand two hundred and eighty-five  
10 (10,285) liens have been filed for TAP participants due to an unpaid water bill.  
11

12 Please note there are no reports available that capture data for the remaining subsections of  
13 this interrogatory.  
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15 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-58.** FOR CHARGES IMPOSED ON TAP PARTICIPANTS REFLECTING THE  
2 COST OF PERFECTING A LIEN FOR UNPAID ARREARS PRE-EXISTING  
3 AS OF THE DATE THEY APPLIED FOR TAP, PLEASE EXPLAIN WHETHER  
4 THOSE CHARGES:  
5 A. ARE ADDED TO THE ARREARAGE BALANCE SUBJECT TO ARREARAGE  
6 FORGIVENESS;  
7 B. ARE ADDED TO THE BILL FOR CURRENT SERVICE OVER AND ABOVE  
8 THE BILL FOR CURRENT SERVICE;  
9 C. ARE TREATED IN SOME OTHER FASHION (PLEASE PROVIDE A  
10 DETAILED EXPLANATION OF THAT TREATMENT).

11  
12 **RESPONSE:**

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

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20 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne  
21 Muhammed, Water Revenue Bureau  
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**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

1 **PA-II-60.** FOR THE DOLLARS OF STATUTORY INTEREST CHARGED, IF AT ALL,  
2 ON DOLLARS OF UNPAID BILLS PREEXISTING AS OF THE DATE A TAP  
3 PARTICIPANT APPLIED FOR TAP, PLEASE EXPLAIN WHETHER THOSE  
4 CHARGES:

5 A. ARE ADDED TO THE ARREARAGE BALANCE SUBJECT TO  
6 FORGIVENESS;

7 B. ARE ADDED TO THE BILL FOR CURRENT SERVICE OVER AND ABOVE  
8 THE BILL FOR CURRENT SERVICE;

9 C. ARE TREATED IN SOME OTHER FASHION (PLEASE PROVIDE A  
10 DETAILED EXPLANATION OF THAT TREATMENT).  
11

12 **RESPONSE:**

13 Please see response to PA-II-59.  
14

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

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

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

10  
11 **RESPONSE:**

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

14  
15 A. Once pre-TAP arrears are forgiven, any lien fees for pre-TAP debt that was liened will  
16 be forgiven; therefore, there would be no recovery through PWD's Tiered Assistance  
17 Program Rate Rider.

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

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21  
22 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Melissa La Buda,  
23 Philadelphia Water Department.

- 1 **PA-II-62.** PLEASE PROVIDE BY MONTH SINCE JULY 2017:
- 2 A. THE NUMBER OF TAP CUSTOMERS WHOSE ARREARS INCURRED
- 3 SUBSEQUENT TO THE DATE THEY APPLIED FOR TAP WERE
- 4 SUFFICIENT TO QUALIFY THEM FOR A MUNICIPAL LIEN;
- 5 B. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY ABOVE
- 6 FOR WHOM PWD PERFECTED A LIEN FOR THOSE IN-PROGRAM
- 7 ARREARS;
- 8 C. THE AGGREGATE DOLLARS OF UNPAID BILLS UNDERLYING THE
- 9 LIENS IDENTIFIED IMMEDIATELY ABOVE;
- 10 D. THE AGGREGATE DOLLARS OF UNPAID BILLS FOR WHICH THE LIEN
- 11 WAS REMOVED AS HAVING BEEN PAID IN FULL SUBSEQUENT TO THE
- 12 PERFECTION OF THE LIEN;
- 13 E. THE NUMBER OF TAP CUSTOMERS IDENTIFIED IMMEDIATELY ABOVE
- 14 FOR WHOM THE LIEN BASED ON IN-PROGRAM ARREARS WAS LATER
- 15 SATISFIED BY THE CUSTOMER PAYING THE UNDERLYING DEBT;
- 16 F. THE DOLLARS OF FEES CHARGED TO CUSTOMERS WITH THOSE PRE-
- 17 EXISTING DEBTS WHICH CHARGE REFLECTED THE COST OF
- 18 PERFECTING OF THE LIEN;
- 19 G. THE COST BASIS FOR ANY/ALL CHARGES IMPOSED ON CUSTOMER
- 20 ACCOUNTS ASSOCIATED WITH THE PERFECTION OF THE LIEN;
- 21 H. THE NUMBER OF TAP CUSTOMERS FOR WHOM THE LIENS IDENTIFIED
- 22 IN SUB-PARAGRAPH "B" ABOVE WAS SUBSEQUENTLY CANCELLED
- 23 OR OTHERWISE REMOVED FOR REASONS OTHER THAN THE
- 24 PAYMENT OF THE UNDERLYING DEBT.
- 25

26 **RESPONSE:**

27 In response to PA-II-62-G, the charges imposed on customer accounts associated with the

28 perfection of the lien as the \$91.45 filing fee is mandated and set by 42 Pa.C.S. § 1725 et

1 seq., 42 Pa.C.S. § 3733, 72 P.S. § 3172, and First Judicial District of Pennsylvania  
2 Administrative Order 2008-01.

3  
4 Please note there are no reports available that capture data for the remaining subsections of  
5 this interrogatory.

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7 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-II-63.** PLEASE PROVIDE A DETAILED DESCRIPTION OF ANY CURRENT  
2 POLICY OF PWD ON WHETHER OR NOT TO PERFECT A LIEN ON THE  
3 UNPAID BILLS OF A TAP PARTICIPANT:

- 4 A. FOR ARREARS PRE-EXISTING AT THE TIME OF TAP ENROLLMENT;  
5 B. FOR IN-PROGRAM TAP ARREARS.

6  
7 **RESPONSE:**

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

11  
12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne A.  
13 Muhammed, Water Revenue Bureau



1 **PA-II-64.** PLEASE PROVIDE A DETAILED EXPLANATION OF:

- 2 A. WHETHER PWD ACCEPTS PAYMENTS TO RETIRE LIENS THAT HAVE  
3 BEEN PLACED BASED ON ARREARS THAT HAVE BEEN FROZEN AS  
4 BEING PRE-PROGRAM ARREARS FOR TAP PARTICIPANTS BUT THAT  
5 HAVE NOT YET BEEN FORGIVEN.
- 6 B. IF SUCH PAYMENTS ARE RECEIVED, PROVIDE AN ADDITIONAL  
7 DETAILED EXPLANATION OF HOW THOSE PAYMENTS ARE TREATED  
8 ONCE FORGIVENESS HAS BEEN EARNED. FOR EXAMPLE, ARE THOSE  
9 PAYMENTS REFUNDED, OR ARE THE ARREARS SUBJECT TO  
10 FORGIVENESS REDUCED BY THE AMOUNT OF THE PAYMENT, OR ARE  
11 THOSE REVENUES TREATED IN SOME OTHER FASHION?  
12

13 **RESPONSE:**

- 14 A. PWD does accept payments to retire liens.
- 15 B. These revenues are treated in some other fashion. Any monies received will be first  
16 applied to any outstanding TAP balance that remains due and the remainder will be  
17 credited to the account and used towards future TAP payments. See also Philadelphia  
18 Code §19-1605 (Limitation on Action to Enforce Collection; Income-Based Water  
19 Rate Assistance Program).  
20

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

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

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

10  
11 **RESPONSE:**

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

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

14  
15 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne A.  
16 Muhammed, Water Revenue Bureau

1 **PA-II-66.** BY MONTH FOR EACH MONTH JULY 2017 TO PRESENT, PLEASE  
2 PROVIDE:

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

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

11  
12 **RESPONSE:**

13 PWD does not charge interest nor does it charge a late fee.  
14

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