

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-40

Dated: February 2021

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

7
8 **RESPONSE:**

9 The Customer Assistance Management Program (CAMP) began tracking OOPA approvals
10 in an automated fashion, as described in response to PA-III-6, in April of 2018. The table
11 below shows the number of TAP enrollees each month, beginning in April 2018, for whom
12 approved OOPA income information was accepted, as required by Philadelphia Code §19-
13 1605(3)(I).(2) (Requiring Acceptance of Determinations of Income and Residency).
14 Historical months' results may vary slightly from results provided in PA-III-60 of the 2020
15 rate case as the underlying OOPA approval data records still available have changed in the
16 interim.

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Year	Month	TAP Income	TAP Hardship	Total
2018	4	1	0	1
2018	5	27	1	28
2018	6	34	1	35
2018	7	13	0	13
2018	8	41	2	43
2018	9	25	0	25
2018	10	59	1	60
2018	11	85	2	87
2018	12	78	0	78
2019	1	157	1	158
2019	2	131	0	131
2019	3	149	2	151
2019	4	125	5	130
2019	5	69	3	72

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PHILADELPHIA WATER DEPARTMENT
Response to PA Interrogatory

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2019	6	74	1	75
2019	7	81	0	81
2019	8	60	1	61
2019	9	68	0	68
2019	10	79	2	81
2019	11	61	1	62
2019	12	53	3	56
2020	1	55	2	57
2020	2	49	1	50
2020	3	25	0	25
2020	4	15	1	16
2020	5	20	0	20
2020	6	5	0	5
2020	7	5	0	5
2020	8	4	0	4
2020	9	1	0	1
2020	10	5	2	7
2020	11	4	0	4
2020	12	4	1	5

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

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

RESPONSE:

The Customer Assistance Management Program (CAMP) began tracking OOPA approvals in an automated fashion, as described in response to PA-III-6, in April of 2018. The table below shows the number of TAP enrollees each month, beginning in April 2018, for whom approved OOPA residency information was accepted, as required by Philadelphia Code §19-1605(3)(I).(2) (Requiring Acceptance of Determinations of Income and Residency).

Year	Month	TAP Income	TAP Hardship	Total
2018	4	1	0	1
2018	5	27	1	28
2018	6	34	1	35
2018	7	13	0	13
2018	8	41	2	43
2018	9	25	0	25
2018	10	59	1	60
2018	11	85	2	87
2018	12	78	0	78
2019	1	157	1	158
2019	2	131	0	131
2019	3	149	2	151
2019	4	125	5	130
2019	5	69	3	72
2019	6	74	1	75
2019	7	81	0	81
2019	8	60	1	61
2019	9	68	0	68
2019	10	79	2	81

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2019	11	61	1	62
2019	12	53	3	56
2020	1	55	2	57
2020	2	49	1	50
2020	3	25	0	25
2020	4	15	1	16
2020	5	20	0	20
2020	6	5	0	5
2020	7	5	0	5
2020	8	4	0	4
2020	9	1	0	1
2020	10	5	2	7
2020	11	4	0	4
2020	12	4	1	5

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

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

5 **RESPONSE:**

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

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10 The Department of Revenue’s Tax Credit and Assistance Programs Unit processes
11 applications for low-income taxpayer installment payment agreements.
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13 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne
14 Muhammad, Water Revenue Bureau
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1 **PA-III-4.** PLEASE PROVIDE A COPY OF ALL WRITTEN CORRESPONDENCE,
2 INCLUDING E-MAILS, LETTERS, MEMOS OR OTHER WRITTEN
3 DOCUMENT OF ANY NATURE, BETWEEN PWD AND/OR WRB AND THE
4 MUNICIPAL OFFICE THAT DETERMINES INCOME-ELIGIBILITY FOR
5 THE PHILADELPHIA TAX HARDSHIP PROGRAM THAT PROPOSES,
6 CONSIDERS, EVALUATES OR OTHERWISE DISCUSSES ANY
7 COLLABORATION BETWEEN THE TAP AND TAX HARDSHIP
8 ASSISTANCE PROGRAM WITH RESPECT TO DETERMINING INCOME
9 ELIGIBILITY FOR THE TWO PROGRAMS.
10

11 **RESPONSE:**

12 See response to PA-III-3. There are no documents available that capture the information
13 requested.
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15 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne
16 Muhammad, Water Revenue Bureau
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1 **PA-III-5.** PLEASE COMPARE AND CONTRAST THE INCOME-ELIGIBILITY FOR
2 THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM AND TAP.
3

4 **RESPONSE:**

5 See response to PA-III-3.
6

7 Also, please refer to The Philadelphia Code sections 19-1305 and 19-1605 (available here:
8 https://codelibrary.amlegal.com/codes/philadelphia/latest/philadelphia_pa/0-0-0-184124),
9 Philadelphia Water Department Regulations section 206.0 et seq. (available here:
10 <http://www.phila.gov/water/PDF/PWDregCH2.pdf>), and the Department of Revenue Real
11 Estate Tax Regulations For City Of Philadelphia And School District Of Philadelphia
12 section 302 et seq. (available here: [https://beta.phila.gov/documents/owner-occupied-
13 payment-agreement-oopa-regulations/](https://beta.phila.gov/documents/owner-occupied-payment-agreement-oopa-regulations/))).
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15 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne
16 Muhammad, Water Revenue Bureau
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- 1 **PA-III-6.** PLEASE PROVIDE A DETAILED DESCRIPTION OF ALL PROCESSES
2 THROUGH WHICH:
3 A. ACTIVE WRAP PARTICIPANTS ARE CROSS-CHECKED AGAINST THE
4 PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM TO
5 DETERMINE INCOME-ELIGIBILITY FOR TAP;
6 B. DEFAULTED WRAP PARTICIPANTS ARE CROSS-CHECKED AGAINST
7 THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM TO
8 DETERMINE INCOME-ELIGIBILITY FOR TAP;
9 C. TAP APPLICANTS, IRRESPECTIVE OF THEIR CURRENT OR FORMER
10 STATUS AS A WRAP PARTICIPANT, ARE CROSS-CHECKED AGAINST
11 THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM TO
12 DETERMINE THEIR INCOME-ELIGIBILITY FOR TAP.

13
14 **RESPONSE:**

15 There is no “Philadelphia Tax Hardship Assistance Program,” however, for the purposes of
16 this response, please refer to programs administered pursuant to Section 19-1305 of The
17 Philadelphia Code. The Department of Revenue’s Tax Credit and Assistance Programs Unit
18 processes applications for low-income taxpayer installment payment agreements. WRB
19 relies on data provided by the Department of Revenue’s Tax Credit and Assistance
20 Programs Unit to cross-reference customer assistance applicants with existing participants
21 in the Owner-occupied Real Estate Tax Payment Agreement (OOPA) program. All
22 applicants for the City’s water customer assistance programs, regardless of their previous
23 participation in WRAP, are cross-referenced with OOPA participation.

24
25 The Customer Assistance Management Program (CAMP), the application workflow and
26 reporting software, receives daily updates of current OOPA approvals. The Customer
27 Assistance Division staff use OOPA determinations of income and residency to complete
28

1 the review of the customer assistance application, if customers have been approved for OOPA
2 during the 12 months preceding receipt of their application.

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4 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau; RaVonne
5 Muhammad, Water Revenue Bureau; and Raftelis Financial Consultants, Inc.

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1 **PA-III-7.** PLEASE IDENTIFY WHICH DATE TAP PARTICIPANTS ARE DEFINED TO
2 BEGIN THEIR PARTICIPATION IN TAP: (1) THE DATE ON WHICH
3 APPLICANTS SUBMIT A TAP APPLICATION; (2) THE DATE ON WHICH
4 APPLICANTS ARE FOUND TO BE ELIGIBLE FOR TAP; OR (3) SOME
5 OTHER DATE (PLEASE IDENTIFY WITH SPECIFICITY WHAT “OTHER”
6 DATE IS USED).

7
8 **RESPONSE:**

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

16
17 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau; RaVonne
18 Muhammad, Water Revenue Bureau; and Raftelis Financial Consultants, Inc.

1 **PA-III-8.** PLEASE IDENTIFY WHETHER THE DATE ON WHICH A TAP APPLICANT
2 IS FOUND TO BE INCOMEELIGIBLE FOR TAP AND THE DATE ON
3 WHICH A TAP APPLICANT IS ENROLLED IN TAP DIFFERS. FOR ANY
4 DIFFERENCE THAT EXISTS BETWEEN THESE TWO DATES, PROVIDE A
5 DETAILED EXPLANATION OF THE REASON FOR THE TIME
6 DIFFERENCE.

7
8 **RESPONSE:**

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

11
12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau; RaVonne
13 Muhammad, Water Revenue Bureau; and Raffelis Financial Consultants, Inc.

1 **PA-III-9.** FOR TAP PARTICIPANTS WHO EXPERIENCE A TIME LAG BETWEEN
2 THE DATE ON WHICH THEY SUBMIT A TAP APPLICATION AND THE
3 DATE ON WHICH THEY ARE ENROLLED IN TAP, PLEASE PROVIDE A
4 DETAILED DESCRIPTION OF WHAT BILLS SUCH APPLICANTS RECEIVE
5 DURING THE TIME AFTER THEY SUBMIT A TAP APPLICATION AND
6 BEFORE THEY ARE ENROLLED IN TAP.

7
8 **RESPONSE:**

9 Applicants will continue to receive their regular monthly bills until they are enrolled in TAP.
10 If those bills remain unpaid at the time the applicant is enrolled in TAP, those arrears will
11 be treated like other pre-TAP arrears. In 2020, the average time between when the
12 application was originally received by WRB and the time it was approved was less than 12
13 days.

14
15 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau; RaVonne
16 Muhammad, Water Revenue Bureau; and Raftelis Financial Consultants, Inc.

1 **PA-III-10.** BY WEEK, SINCE JULY 1, 2017, PROVIDE THE NUMBER OF TAP
2 ENROLLEES BY HOMEOWNER/TENANT STATUS.
3

4 **RESPONSE:**

5 The number of TAP enrollees by homeowner/tenant status, by week, is provided in the
6 attachment PA-III-10.
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8 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-III-11.** PLEASE PROVIDE ANY BUDGET DOCUMENT (OR OTHER WRITTEN
2 DOCUMENT OF ANY NATURE) PREPARED IN THE PERIOD JANUARY
3 2017 TO PRESENT:

4 A. PROJECTING TAP PARTICIPATION BY MONTH;

5 B. PRESENTING A SIDE-BY-SIDE COMPARISON OF PROJECTED TAP
6 PARTICIPATION VERSUS ACTUAL TAP PARTICIPATION.

7
8 **RESPONSE:**

9 The 2020 Reconcilable Rate Rider Report, originally provided in Raftelis' direct testimony
10 of the 2020 Annual Rate Adjustment proceeding as Schedule RFC-3 and provided again
11 here as attachment PA-III-11_A, includes actual and projected TAP participation numbers
12 on the "TRR_Projections" page. The Monthly TAP Program Statistics report as of January
13 1, 2021 attached as PA-III-11_B provides actual TAP participation in prior months.

14
15 Synopsis of Monthly TAP Program Statistics Columns:

16 **(a) New TAP Enrollees**

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

22
23 **(b) Total TAP Participants**

24 The number of customers that were issued a TAP bill during the calendar month in question.
25 Customers issued more than one TAP bill during a calendar month were counted once.
26 Customers not issued a TAP bill during a calendar month were not counted for the month
27 in question. Note that depending on a customer's billing cycle, a customer enrolled in one
28 month (counted in (a) above) is included in this number in the month in which receive their

1 first bill, which may not be the same month that customer is enrolled. Customers for whom
2 bills are reversed and re-issued in a subsequent month are not counted in TAP Participants
3 for a particular month.

4 Note: TAP Participants were lower in September-November of 2020 because they
5 excluded customers who originally received a TAP bill but were subsequently reversed
6 and rebilled owing to data updates associated with the rollout of principal forgiveness that
7 impacted approximately 2,200 accounts. These we correctly reversed and rebilled in
8 December 2020.

9
10 **(c) Number of TAP New Enrollees Having Preprogram Arrears at the Time of**
11 **Enrollment**

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

16
17 **(d) Aggregate Dollars of Preprogram Arrears for TAP New Enrollees at the Time of**
18 **Enrollment**

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

21
22 **(e) Number of TAP Bills Issued**

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

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27 **(f) Dollars of TAP Bills Issued**

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

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(g) Dollars of TAP Credits/Discounts

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

(h) Number of TAP Payments

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

(i) Dollars of TAP Payments

During the calendar month, the total dollar amount of credits (payments) allocated to (that is, pay off) debits associated with TAP bills issued at any time. (j) Number of TAP In-Full and On-Time Payments The number of payments allocated during the calendar month to debit lines associated with TAP bills within 30 days of the date the bill was issued which bring the balance of the bill to \$0. (k) Number of Participants With TAP Balance Aged X-Y days The number of participants with at least one TAP bill bearing an unpaid balance with an age within the indicated range. The ranges provided are:

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

An unpaid balance was determined as the total dollar amount of the account's TAP bills minus the sum of all payments made against the bills prior to the creation date of the most recent bill issued during the month in question. As described under item (h), a payment was determined as a credit allocated to a debit line associated with a TAP bill. The age of the

1 unpaid balance was determined as the number of elapsed days between the creation date of
2 the bill in question and the creation date of the most recent TAP bill issued during the
3 calendar month in question. Note that a TAP bill that is issued with a negative total is not
4 counted as bearing a balance aged 0-30 days. Such bills will be included in the counts and
5 sums in items (e) and (f).

6
7 **(l) Dollars of TAP Balance Aged X-Y days**

8 The total dollar amount of unpaid balances of TAP bills identified as described in part (k)
9 above. The ranges provided are:

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

15
16 **(m) Number of TAP Participants Having Preprogram Arrears at the Time of
17 Enrollment**

18 This is the count of TAP Participants (distinct account keys issued a bill during the month
19 in question as determined for PA-ADV-86 “(b) Total TAP Participants”) that had Arrears >
20 0 at the time of enrollment (as determined for PAADV-86 “(c) Number of TAP New
21 Enrollees Having Preprogram Arrears at the Time of Enrollment”).

22
23 **(n) Aggregate Dollars of Preprogram Arrears at the Time of Enrollment for TAP
24 Participants**

25 This is the sum of arrears of enrollees identified in PA-III-15(a).

26
27 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-III-12.** CONFIRM OR DENY: THE ADMINISTRATIVE COSTS ASSOCIATED WITH
2 TAP ARE NOT SUBJECT TO RECONCILIATION THROUGH PWD'S TAP
3 RIDER. IF DENIED, PLEASE IDENTIFY IN THE RATE RIDER THE
4 SPECIFIC LOCATION AT WHICH THE RECONCILIATION OF
5 ADMINISTRATIVE COSTS IS IDENTIFIED AND/OR DISCUSSED.
6

7 **RESPONSE:**

8 Confirm.
9

10 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC
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1 **PA-III-13.** BY YEAR, FOR EACH FISCAL YEAR 2017 TO PRESENT, PLEASE
2 IDENTIFY THE SPECIFIC DOLLAR AMOUNT OF TAP ADMINISTRATIVE
3 COSTS CURRENTLY BEING COLLECTED IN PWD BASE RATES,
4 DISAGGREGATED BY:
5 A. WAGES;
6 B. BENEFITS;
7 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);
8 D. INFORMATION TECHNOLOGY;
9 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS
10 CALCULATED);
11 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE “OTHER” IS).
12

13 **RESPONSE:**

14 Current PWD base rates are based upon the Test Year 2020 cost of service analysis used to
15 establish rates per the 2018 Rate Determination. Base rates reflect the associated test year
16 cost of service.
17

18 Please refer to Response Attachment PA-III-13 to 14 for further information regarding
19 administrative costs. This analysis presented in the response attachment reflects actual
20 invoices paid and is not aligned with Fiscal Year budgeting parameters nor is it aligned with
21 the period for which services were rendered. Additionally, due to certain data challenges
22 with previously supplied response sets, the Department has restated paid invoices for certain
23 vendors. The vendors and time periods are (i) Novati, July 2017 and November 2017 and
24 (ii) Vanguard, February 2018. This has reduced the cost of the TAP costs by approximately
25 \$75,000 for the time period of 7/2017-2/2018.
26

27 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Black & Veatch Management
28 Consulting, LLC

1 **PA-III-14.** PLEASE IDENTIFY, BY MONTH SINCE JULY 2017, THE ACTUAL
2 DOLLAR AMOUNT OF ADMINISTRATIVE COSTS EXPENDED ON TAP
3 SINCE JULY 1, 2017, DISAGGREGATED BY:

- 4 A. WAGES;
5 B. BENEFITS;
6 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);
7 D. INFORMATION TECHNOLOGY;
8 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS
9 CALCULATED);
10 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE "OTHER" IS).

11
12 **RESPONSE:**

13 Please see Response Attachment PA-III-13 to 14.

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15 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-III-15.** PLEASE PROVIDE A DETAILED EXPLANATION OF HOW ANY TAP
2 ADMINISTRATIVE COSTS CURRENTLY BEING COLLECTED IN PWD
3 RATES BUT WHICH EXCEED TAP ADMINISTRATIVE COSTS ACTUALLY
4 EXPENDED WILL BE TREATED FOR RATEMAKING PURPOSES IN
5 FUTURE RATE PERIODS.
6

7 **RESPONSE:**

8 Any additional costs would either be offset by underspending in other areas and/or
9 supported via additional funding from the Rate Stabilization Fund (RSF).
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11 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC
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1 **PA-III-16.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE DOLLAR
2 AMOUNT BY WHICH THE 25% "CONTINGENCY" FOR TAP
3 ADMINISTRATIVE COSTS CURRENTLY BEING COLLECTED IN PWD
4 RATES WAS ACCESSED BY MONTH FOR EACH MONTH JULY 2017 TO
5 PRESENT.

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

9
10 **RESPONSE:**

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

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16 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC
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1 **PA-III-17.** PLEASE PROVIDE PAYMENT PATTERN REPORTS BY MONTH FOR JULY
2 2017 TO PRESENT LIMITED TO TAP PARTICIPANTS.

3
4 **RESPONSE:**

5 The FY 2020 Low Income Billing & Payments Report provides payment pattern
6 information for TAP participants. This report was originally provided in Raftelis' direct
7 testimony within PWD Statement No. 6 as Schedule RFC-9.

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

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1 **PA-III-18.** PLEASE DEFINE THE TERMS:

2 A. BILLINGS

3 B. PAYMENTS

4 C. TOTAL PERCENT COLLECTED

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6 **RESPONSE:**

7 As they relate to FY 2020 Payment Patterns report, included in Raftelis' direct testimony
8 in PWD Statement No. 6, Schedule RFC-6, the following terms are defined.

9
10 Billings are defined as service and usage charge transaction types from the basis2
11 *cis_transactions* table, with creation dates during the fiscal year in question. Billings
12 include all City accounts except those designated as PWD accounts; they include only
13 retail customers, excluding any wholesale customers. Total billings are split between Non-
14 Stormwater Only (Non-SWO) and Stormwater Only (SWO) accounts based on the
15 account's installation designation contained in the basis2 *cis_installations* table.

16
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18 Payments for accounts other than City accounts are defined as receipt or transfer credits
19 allocated to Billings (see definition above). Payments are reported only when they link to
20 specific Billings transactions reported for the fiscal year in question. Payments in the
21 'Billing Year' are those that were received by the end of the fiscal year in which they were
22 billed. Payments in 'Billing year +1' are those that were received during the subsequent
23 fiscal year. Payments in 'Billing year +2 and beyond' are those that were received any
24 time after the subsequent fiscal year. Payments are dated based on their Allocation Date in
25 the basis2 *cis_crdr_allocations* table.
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1 Total percent collected is calculated as the Total Payments (see definition above) for the
2 time period of interest (Billing Year, Billing Year + 1, or Billing Year + 2 and Beyond)
3 divided by the Total Billings (see definition above) for the fiscal year of interest.
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5 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-III-19.** IN ASSESSING COLLECTIONS FOR PWD, PLEASE:

2 A. DEFINE THE TERM “RECEIPTS”

3 B. SEPARATELY INDICATE HOW THE DISTINCTION BETWEEN

4 “BILLINGS” AND “RECEIPTS” IS USED IN CALCULATING RATE LEVELS.

5
6 **RESPONSE:**

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

- 8 • In the context of retail revenues, receipts refer to the cumulative anticipated actual
9 revenues in each fiscal year, for the water, sanitary sewer, and stormwater services. The
10 cumulative actual revenues of a given fiscal year are estimated as the sum of payments
11 received in “Billing Year,” “Billing Year Plus 1,” and “Billing Year Plus 2 and Beyond.”
12 “Billings” are first projected based on existing rate schedules and projected units of
13 service, for each fiscal year. Appropriate collection factors are then applied to Billings
14 to estimate the actual cumulative “Receipts” for the fiscal year. Please also see the
15 explanation provided in PWD Statement No. 7A, Schedule BV-6: WP-1.
- 16 • In the context of wholesale revenues, receipts refer to 100% of billings estimated for
17 each wholesale customer.

18
19 B. For the purpose of this response, we assume “RATE LEVELS” referenced in the question
20 above means the annual “additional revenues” projected in the FY 2021 through FY 2026
21 financial plan. The annual “additional revenues” (RATE LEVELS) for each fiscal year are
22 then calculated based on the estimated cumulative Receipts of the fiscal year.

23
24 The application of collection factors is outlined in Section 3.1.4.3 on page 3-6 and 3-7 of
25 the “*Water and Wastewater Cost of Service Report*” as provided in PWD Statement No.
26 7A, Schedule BV-5.

27
28 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC

1 **PA-III-20.** PLEASE PROVIDE A COPY OF ALL AGENDAS AND ALL MINUTES OF
2 TAP ADVISORY COMMITTEE MEETINGS FROM JULY 1, 2017 TO
3 PRESENT.
4

5 **RESPONSE:**

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

10 Recent meeting notes and agendas are provided in response attachment PA-III-20.
11

12 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-III-21.** PLEASE PROVIDE A COPY OF ALL WRITTEN PRESENTATIONS, MEMOS
2 OR OTHER WRITTEN DOCUMENTS OF ANY NATURE FROM PWD OR
3 WRB (INCLUDING THEIR CONSULTANTS) PROVIDED TO TAP
4 ADVISORY COMMITTEE MEMBERS AT AN ADVISORY COMMITTEE
5 MEETING FROM JULY 1, 2017 TO PRESENT.

6

7 **RESPONSE:**

8 Please see response to PA-III-20.

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

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1 **PA-III-22.** PLEASE PROVIDE A COPY OF ALL WRITTEN PRESENTATIONS, MEMOS
2 OR OTHER WRITTEN DOCUMENTS OF ANY NATURE FROM PWD OR
3 WRB (INCLUDING THEIR CONSULTANTS) PROVIDED TO CITY
4 COUNCIL, THE WATER BOARD, OR ANY OTHER PHILADELPHIA
5 MUNICIPAL ENTITY OR OFFICIAL REGARDING TAP FROM JULY 2017
6 TO PRESENT.

7
8 **RESPONSE:**

9 Please see attached PA-III-22 City Presentations. The attached documents may contain
10 figures and estimates that may no longer represent TAP program performance or other
11 metrics (such as lost revenue). The participant is directed to the current filing before the
12 Water, Sewer and Storm Water Rate Board for current program statistics.

13
14 Annual Reports to the Mayor and City Council on TAP, as required under Philadelphia
15 Code Section 19-1605(7) are included as attachment, PA-III-22.

16
17 **RESPONSE PROVIDED BY:** Philadelphia Water Department, Water Revenue Bureau, Raftelis
18 Financial Consultants, Inc., and Black & Veatch Management Consulting, LLC.

1 **PA-III-23.** PLEASE PROVIDE A COPY OF ALL PRESENTATIONS BY A PWD OR WRB
2 OFFICIAL (INCLUDING RAFTELLIS AND/OR BLACK AND VEATCH
3 PERSONNEL TESTIFYING IN THIS PROCEEDING) TO A CONFERENCE,
4 SEMINAR, OR OTHER PUBLIC OR INDUSTRY GATHERING REGARDING
5 TAP FROM JULY 2017 TO PRESENT.
6

7 **RESPONSE:**

8 Please see attached PA-III-23 Presentations. The attached documents may contain figures
9 and estimates that may no longer represent TAP program performance or other metrics (such
10 as lost revenue). The participant is directed to the current filing before the Water, Sewer and
11 Storm Water Rate Board for current program statistics.
12

13 **RESPONSE PROVIDED BY:** Philadelphia Water Department, Water Revenue Bureau, Raftelis
14 Financial Consultants, Inc., and Black & Veatch Management Consulting, LLC.
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1 **PA-III-24.** PLEASE PROVIDE A COPY OF ALL PUBLICATIONS, REPORTS, OR
2 OTHER PUBLISHED WRITTEN DOCUMENTS AUTHORED BY A PWD OR
3 WRB OFFICIAL (INCLUDING RAFTELLIS AND/OR BLACK AND VEATCH
4 PERSONNEL TESTIFYING IN THIS PROCEEDING), AND PUBLISHED
5 REGARDING TAP, FROM JULY 2017 TO PRESENT.
6

7 **RESPONSE:**

8 The Water Environment Federation (WEF) Manual of Practice 27 was published in 2018.
9 Authors include personnel testifying in this proceeding. The publication can be found at
10 <https://www.e-wef.org/Store/ProductDetails.aspx?productId=62500667>.
11

12 PWD's and WRB's consultants may publish articles in trade journals such as the American
13 Water Works Association (AWWA), the National Association of Clean Water Agencies
14 (NACWA), the Water Environment Federation (WEF) etc.
15

16 The webpages are provided for your ease of use and reference: <https://www.wef.org/>,
17 <https://www.awwa.org/>, and <https://www.nacwa.org/> should you wish to avail yourself of
18 materials.
19

20 The published articles may contain figures and estimates that may no longer represent
21 current performance or metrics. The participant is directed to the current filing before the
22 Water, Sewer and Storm Water Rate Board for current statistics and available relevant data.
23

24 **RESPONSE PROVIDED BY:** RaVonne A. Muhammad, Water Revenue Bureau; Raftelis
25 Financial Consultants, Inc.; and Black & Veatch Management Consulting, LLC.
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1 **PA-III-25.** PLEASE PROVIDE A SINGLE COPY, FOR THE PERIOD JULY 1, 2017 TO
2 PRESENT, OF THE FOLLOWING:

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

11
12 **RESPONSE:**

13 Refer to PA-III-26 for daily and weekly processing reports. Refer to the response to PA-
14 III-11 and attachment PA-III-11_B for reporting that includes monthly program statistics.
15 This report is updated as new months of data are available. PA-III-11_A includes the most
16 recent cost of program reporting. The report reflecting the end of December 2020 is
17 provided. Attachment PA-III-22 provides City Council-required reports. One additional
18 attachment, PA-III-25, provided here, summarizes the portion of applications decided
19 within various timeframes.

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21 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-III-26.** PLEASE PROVIDE A SINGLE COPY, FOR THE PERIOD JULY 1, 2017 TO
2 PRESENT, OF THE FOLLOWING:

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

14
15 **RESPONSE:**

16 Daily reporting on the number of applications requested (by method), submitted (by
17 method), and final dispositions are included as attachment PA-III-26_A. These reports
18 also include cumulative information since the beginning of the program. Weekly
19 processing statistics reports are included as PA-III-26_B. Weekly reporting on
20 applications submitted and reviewed are included as PA-III-26_C. Weekly reporting on
21 TAP approvals, broken down between FPL and arrearage categories, are included as PA-
22 III-26_D.

23
24
25 Refer to the response to PA-III-11 and attachment PA-III-11_B for reporting that includes
26 TAP participation, TAP discounts, and TAP bill payments.

27
28 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

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1 **PA-III-27.** PLEASE PROVIDE IN EXCEL FORMAT THE NUMBER OF TAP
2 PARTICIPANTS AS OF THE END OF THE MONTH BY MONTH FOR EACH
3 MONTH JANUARY 2017 TO PRESENT.
4

5 **RESPONSE:**

6 The Monthly TAP Program Statistics report, provided as attachment PA-III-11_B, includes
7 the number of TAP participants in each month since the beginning of TAP. Participants are
8 defined as the number of unique customers that received a TAP bill during a particular
9 month.
10

11 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-III-28.** PLEASE PROVIDE THE NUMBER OF TAP EXITS, BY REASON FOR THE
2 EXIT, BY MONTH SINCE JULY 2017 TO PRESENT INCLUSIVE.
3

4 **RESPONSE:**

5 A monthly report on this topic does not exist, however, the ordinance requiring an Annual
6 Report to the Mayor and City Council on TAP also requires reporting on annual TAP
7 defaults within each written report. Past reports are provided as attachment PA-III-22. By
8 ordinance, customers can default from TAP for submitting intentionally false enrollment or
9 recertification information/documentation, unauthorized use of service, failure to recertify
10 upon request by WRB, or failure to accept and reasonably maintain free conservation
11 service offered by the Water Department.
12

13 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-III-29.** PLEASE PROVIDE BY YEAR FOR THE YEARS 2017 TO PRESENT
2 INCLUSIVE:
3 A. AVERAGE NUMBER OF CONFIRMED LOW-INCOME CUSTOMERS.
4 B. AVERAGE NUMBER OF ESTIMATED LOW-INCOME CUSTOMERS.

5
6 FOR PURPOSES OF THIS AND OTHER QUESTIONS USING THIS TERM, A
7 “CONFIRMED LOW-INCOME CUSTOMER” IS A CUSTOMER THAT PWD
8 KNOWS, OR HAS REASON TO KNOW, IS A CUSTOMER WITH INCOME
9 AT OR BELOW 150% OF THE FEDERAL POVERTY LEVEL.
10

11 **RESPONSE:**

12 PWD does not have a “number of confirmed low-income customers” nor a “number of
13 estimated low-income customers.” Rather, PWD has data on historical TAP and Senior
14 Citizen Discount program participation, and projections for future TAP participation. Data
15 on historical TAP participation since the beginning of the program can be found in the
16 Monthly TAP Program Statistics report, included as PA-III-11_B, which was generated on
17 January 1, 2021. Data on historical senior citizen discount participation can be found in
18 Report 1abc, which is provided as Schedule RFC-4 within PWD Statement No. 6. Data on
19 projected TAP participation is generated as part of the Rate Adjustment Proceeding, in the
20 TAP Reconcilable Rate Rider Reporting. The latest data are provided again as PA-III-11_A.
21

22 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-III-30.** IN EXCEL FORMAT, PROVIDE A LIST OF EACH CENSUS TRACT
2 COMPRISING, IN WHOLE OR PART, THE PWD SERVICE TERRITORY.
3

4 **RESPONSE:**

5 To the best of my knowledge, there are no reports or documents available that contain the
6 information requested.
7

8 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
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1 **PA-III-31.** IN EXCEL FORMAT, PROVIDE A LIST OF EACH ZIP CODE COMPRISING,
2 IN WHOLE OR PART, THE PWD SERVICE TERRITORY.

3

4 **RESPONSE:**

5 See response attachment PA-III-31 PWD Service Territory by Zip Code.

6

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

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1 **PA-III-32.** IN THE AGING REPORTS MAINTAINED BY PWD, PROVIDE FOR EACH
2 "ROUTE" REFERENCED:

- 3 A. THE ZIP CODES WHICH, IN WHOLE OR PART, COMPRISE THAT ROUTE;
4 B. THE CENSUS TRACTS WHICH, IN WHOLE OR PART, COMPRISE THAT
5 ROUTE.

6
7 **RESPONSE:**

- 8 A. See response attachment PA-III-32.
9 B. There is no report available that captures the requested data.

10
11 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

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1 **PA-III-33.** IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD,
2 PLEASE PROVIDE A DETAILED EXPLANATION OF WHAT CUSTOMERS
3 ARE INCLUDED IN THE POPULATION LABELLED “TAP CUSTOMERS
4 OUTSIDE OF TAP ENROLLMENT.”

5
6 **RESPONSE:**

7 In the Low Income Billing & Payments report, provided as Schedule RFC-9 within PWD
8 Statement No. 6., “TAP Customers Outside of TAP Enrollment” lines summarize billings
9 within each fiscal year and payments within relevant timeframes for customers who at
10 another point in time (either prior to or after the billings included) are TAP participants.
11 These records only include their billings and payments for these customers for time periods
12 when they are not participating in TAP.

13
14 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-III-34.** IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD,
2 PLEASE PROVIDE A DETAILED EXPLANATION OF THE DISTINCTION
3 BETWEEN “TAP CUSTOMERS OUTSIDE OF TAP ENROLLMENT” IN THE
4 YEARS PRIOR TO THE IMPLEMENTATION OF TAP AND “TAP
5 CUSTOMERS OUTSIDE OF TAP ENROLLMENT” IN THE YEARS
6 SUBSEQUENT TO THE IMPLEMENTATION OF TAP.
7

8 **RESPONSE:**

9 In the Low Income Billing & Payments report, provided as Schedule RFC-9 within PWD
10 Statement No. 6., “TAP Customers Outside of TAP Enrollment” lines summarize billings
11 within each fiscal year and payments within relevant timeframes for customers who at
12 another point in time (either prior to or after the billings included) are TAP participants.
13 These records only include their billings and payments for these customers for time periods
14 when they are not participating in TAP.
15

16 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-III-35.** IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD,
2 PLEASE PROVIDE A DETAILED EXPLANATION OF HOW “TAP
3 CUSTOMERS OUTSIDE OF TAP ENROLLMENT” WERE IDENTIFIED
4 PRIOR TO FISCAL YEAR 2018.

5
6 **RESPONSE:**

7 Please see the response to PA-III-34.

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

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1 **PA-III-36.** IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD,
2 PLEASE PROVIDE A DETAILED EXPLANATION OF WHY CUSTOMERS
3 WHO ARE LABELLED “SENIOR CITIZEN DISCOUNT” ARE COMBINED
4 WITH CUSTOMERS WHO ARE LABELLED “TAP” FOR PURPOSES OF
5 CALCULATING COLLECTABILITY.
6

7 **RESPONSE:**

8 In the Low Income Billing & Payments report, provided as Schedule RFC-9 within PWD
9 Statement No. 6., one category of billings and relevant payments is labeled “TAP (including
10 TAP and Senior Citizens Discount).” This category includes all TAP bills, even those for
11 customer that are also designated as Senior Citizen Discount customers within the billing
12 system. All billings within this category are TAP bills, calculated as described in PWD
13 Statement No. 5.
14

15 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-III-37.** PLEASE PROVIDE A RESTATEMENT OF THE COLLECTABILITY
2 STUDIES PREPARED BY OR FOR PWD WITH TAP CUSTOMERS
3 SEPARATELY STATED (I.E., NOT COMBINED WITH “SENIOR CITIZEN
4 DISCOUNT”).

5
6 **RESPONSE:**

7 Please refer to the response to PA-III-36. All billings included in “TAP (including TAP and
8 Senior Citizens Discount)” are TAP billings.

9
10 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-III-38.** PLEASE PROVIDE ALL COLLECTABILITY STUDIES PREPARED BY OR
2 FOR PWD WITH DATA THROUGH JANUARY DECEMBER 2020.
3

4 **RESPONSE:**

5 The FY 2020 Low Income Billing & Payments Report, originally provided in Raftelis'
6 direct testimony within PWD Statement No. 6 as Schedule RFC-9, and the FY 2020
7 Payment Patterns Report, originally provided in Raftelis' direct testimony within PWD
8 Statement No. 6 as Schedule RFC-6 are provided and cover the period through the end of
9 the fiscal year - June 30, 2020. No reporting through December 2020 (covering July 1, 2020
10 through the end of the calendar year) are available.
11

12 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-III-39.** FOR EACH ZIP CODE, PROVIDE:

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

3 B. THE NUMBER OF CONFIRMED LOW-INCOME CUSTOMERS IN THAT ZIP
4 CODE; AND

5 C. THE NUMBER OF TAP PARTICIPANTS SERVED IN THAT ZIP CODE.

6

7 **RESPONSE:**

8 A. Please see attachment PA-ADV-1, response A.

9 B. Please see attachment PA-ADV-1, response D.

10 C. Please see attachment PA-ADV-1, response D.

11

12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Raftelis Financial
13 Consultants, Inc.

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- 1 **PA-III-40.** IN EXCEL FORMAT, FOR THE MOST RECENT 12 MONTH PERIOD
2 AVAILABLE, PLEASE PROVIDE ANY INFORMATION THAT IS
3 AVAILABLE THAT IS BROKEN DOWN GEOGRAPHICALLY (E.G., ZIP
4 CODE, CENSUS TRACT) REGARDING RESIDENTIAL CUSTOMERS':
- 5 A. AMOUNT OF BILLED REVENUE (IN DOLLARS);
 - 6 B. PAYMENTS (IN DOLLARS);
 - 7 C. ARREARS (IN DOLLARS);
 - 8 D. NUMBER OF BILLS RENDERED;
 - 9 E. NUMBER OF PAYMENTS RECEIVED;
 - 10 F. NUMBER OF ACCOUNTS IN ARREARS;
 - 11 G. NUMBER OF DISCONNECTIONS;
 - 12 H. NUMBER OF RECONNECTIONS.

13
14 IF INFORMATION IS BROKEN DOWN BY MORE THAN ONE
15 GEOGRAPHIC AREA, PROVIDE THAT INFORMATION WHICH IS
16 AVAILABLE ON THE MOST GEOGRAPHICALLY DISAGGREGATED
17 BASIS (E.G., CENSUS TRACT RATHER THAN ZIP CODE).
18

19 **RESPONSE:**

20 See response attachment PA-III-40 AR Aging by Postal Zone Report. Please note there are
21 no reports available that capture the data requested in subsections (A), (B), and (D) through
22 (H).
23

24 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
25
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