RESPONSE TO

PUBLIC ADVOCATE’S INTERROGATORIES

AND

REQUESTS FOR PRODUCTION OF DOCUMENTS

QUESTIONS 1-40

Dated: February 2021
PA-III-1. BY MONTH FOR JULY 2017 THROUGH PRESENT, PLEASE PROVIDE THE NUMBER OF TAP ENROLLEES WHOSE INCOME INFORMATION WAS ACCEPTED FOR ENROLLMENT IN TAP DUE TO THE AUTOMATIC ACCEPTANCE OF INCOME PROVISIONS OF PHILADELPHIA CODE §19-1605(3)(I)(.2) (REQUIRING ACCEPTANCE OF DETERMINATIONS OF INCOME AND RESIDENCY).

RESPONSE:

The Customer Assistance Management Program (CAMP) began tracking OOPA approvals in an automated fashion, as described in 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 income information was accepted, as required by Philadelphia Code §19-1605(3)(I)(.2) (Requiring Acceptance of Determinations of Income and Residency). Historical months’ results may vary slightly from results provided in PA-III-60 of the 2020 rate case as the underlying OOPA approval data records still available have changed in the interim.

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**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).

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**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
PA-III-3. PLEASE IDENTIFY AND PROVIDE A DETAILED DESCRIPTION OF THE MUNICIPAL OFFICE THAT DETERMINES INCOME-ELIGIBILITY FOR THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM.

RESPONSE:

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

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne Muhammad, Water Revenue Bureau
PA-III-4. PLEASE PROVIDE A COPY OF ALL WRITTEN CORRESPONDENCE, INCLUDING E-MAILS, LETTERS, MEMOS OR OTHER WRITTEN DOCUMENT OF ANY NATURE, BETWEEN PWD AND/OR WRB AND THE MUNICIPAL OFFICE THAT DETERMINES INCOME-ELIGIBILITY FOR THE PHILADELPHIA TAX HARDSHIP PROGRAM THAT PROPOSES, CONSIDERS, EVALUATES OR OTHERWISE DISCUSSES ANY COLLABORATION BETWEEN THE TAP AND TAX HARDSHIP ASSISTANCE PROGRAM WITH RESPECT TO DETERMINING INCOME ELIGIBILITY FOR THE TWO PROGRAMS.

RESPONSE:

See response to PA-III-3. There are no documents available that capture the information requested.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne Muhammad, Water Revenue Bureau
PA-III-5. PLEASE COMPARE AND CONTRAST THE INCOME-ELIGIBILITY FOR
THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM AND TAP.

RESPONSE:

See response to PA-III-3.


RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne Muhammad, Water Revenue Bureau
PA-III-6. PLEASE PROVIDE A DETAILED DESCRIPTION OF ALL PROCESSES THROUGH WHICH:

A. ACTIVE WRAP PARTICIPANTS ARE CROSS-CHECKED AGAINST THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM TO DETERMINE INCOME-ELIGIBILITY FOR TAP;
B. DEFAULTED WRAP PARTICIPANTS ARE CROSS-CHECKED AGAINST THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM TO DETERMINE INCOME-ELIGIBILITY FOR TAP;
C. TAP APPLICANTS, IRRESPECTIVE OF THEIR CURRENT OR FORMER STATUS AS A WRAP PARTICIPANT, ARE CROSS-CHECKED AGAINST THE PHILADELPHIA TAX HARDSHIP ASSISTANCE PROGRAM TO DETERMINE THEIR INCOME-ELIGIBILITY FOR TAP.

RESPONSE:

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

The Customer Assistance Management Program (CAMP), the application workflow and reporting software, receives daily updates of current OOPA approvals. The Customer Assistance Division staff use OOPA determinations of income and residency to complete...
PHILADELPHIA WATER DEPARTMENT
Response to PA Interrogatory

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau; RaVonne Muhammad, Water Revenue Bureau; and Raftelis Financial Consultants, Inc.
PA-III-7. PLEASE IDENTIFY WHICH DATE TAP PARTICIPANTS ARE DEFINED TO BEGIN THEIR PARTICIPATION IN TAP: (1) THE DATE ON WHICH APPLICANTS SUBMIT A TAP APPLICATION; (2) THE DATE ON WHICH APPLICANTS ARE FOUND TO BE ELIGIBLE FOR TAP; OR (3) SOME OTHER DATE (PLEASE IDENTIFY WITH SPECIFICITY WHAT “OTHER” DATE IS USED).

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau; RaVonne Muhammad, Water Revenue Bureau; and Raftelis Financial Consultants, Inc.
PA-III-8. PLEASE IDENTIFY WHETHER THE DATE ON WHICH A TAP APPLICANT IS FOUND TO BE INCOMEELIGIBLE FOR TAP AND THE DATE ON WHICH A TAP APPLICANT IS ENROLLED IN TAP DIFFERS. FOR ANY DIFFERENCE THAT EXISTS BETWEEN THESE TWO DATES, PROVIDE A DETAILED EXPLANATION OF THE REASON FOR THE TIME DIFFERENCE.

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau; RaVonne Muhammad, Water Revenue Bureau; and Raftelis Financial Consultants, Inc.
PA-III-9. FOR TAP PARTICIPANTS WHO EXPERIENCE A TIME LAG BETWEEN THE DATE ON WHICH THEY SUBMIT A TAP APPLICATION AND THE DATE ON WHICH THEY ARE ENROLLED IN TAP, PLEASE PROVIDE A DETAILED DESCRIPTION OF WHAT BILLS SUCH APPLICANTS RECEIVE DURING THE TIME AFTER THEY SUBMIT A TAP APPLICATION AND BEFORE THEY ARE ENROLLED IN TAP.

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau; RaVonne Muhammad, Water Revenue Bureau; and Raftelis Financial Consultants, Inc.
PA-III-10. BY WEEK, SINCE JULY 1, 2017, PROVIDE THE NUMBER OF TAP ENROLLEES BY HOMEOWNER/TENANT STATUS.

RESPONSE:

The number of TAP enrollees by homeowner/tenant status, by week, is provided in the attachment PA-III-10.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-11. PLEASE PROVIDE ANY BUDGET DOCUMENT (OR OTHER WRITTEN DOCUMENT OF ANY NATURE) PREPARED IN THE PERIOD JANUARY 2017 TO PRESENT:

A. PROJECTING TAP PARTICIPATION BY MONTH;
B. PRESENTING A SIDE-BY-SIDE COMPARISON OF PROJECTED TAP PARTICIPATION VERSUS ACTUAL TAP PARTICIPATION.

RESPONSE:

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

Synopsis of Monthly TAP Program Statistics Columns:

(a) New TAP Enrollees

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

(b) Total TAP Participants

The number of customers that were issued a TAP bill during the calendar month in question. Customers issued more than one TAP bill during a calendar month were counted once. Customers not issued a TAP bill during a calendar month were not counted for the month in question. Note that depending on a customer’s billing cycle, a customer enrolled in one month (counted in (a) above) is included in this number in the month in which receive their
first bill, which may not be the same month that customer is enrolled. Customers for whom bills are reversed and re-issued in a subsequent month are not counted in TAP Participants for a particular month.
Note: TAP Participants were lower in September-November of 2020 because they excluded customers who originally received a TAP bill but were subsequently reversed and rebilled owing to data updates associated with the rollout of principal forgiveness that impacted approximately 2,200 accounts. These we correctly reversed and rebilled in December 2020.

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

(d) Aggregate Dollars of Preprogram Arrears for TAP New Enrollees at the Time of Enrollment
The total dollar amount of arrears, defined as account balance, as defined in part (c) above. This excludes any balances that were in dispute or bankruptcy at the time of approval.

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

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

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

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

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

(m) Number of TAP Participants Having Preprogram Arrears at the Time of Enrollment

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

(n) Aggregate Dollars of Preprogram Arrears at the Time of Enrollment for TAP Participants

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

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

RESPONSE:

Confirm.

RESPONSE PROVIDED BY: Black & Veatch Management Consulting, LLC
PA-III-13. BY YEAR, FOR EACH FISCAL YEAR 2017 TO PRESENT, PLEASE
IDENTIFY THE SPECIFIC DOLLAR AMOUNT OF TAP ADMINISTRATIVE
COSTS CURRENTLY BEING COLLECTED IN PWD BASE RATES,
DISAGGREGATED BY:

A. WAGES;
B. BENEFITS;
C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);
D. INFORMATION TECHNOLOGY;
E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS
CALCULATED);
F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE “OTHER” IS).

RESPONSE:

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

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

RESPONSE PROVIDED BY: Philadelphia Water Department and Black & Veatch Management
Consulting, LLC
PA-III-14. PLEASE IDENTIFY, BY MONTH SINCE JULY 2017, THE ACTUAL
DOLLAR AMOUNT OF ADMINISTRATIVE COSTS EXPENDED ON TAP
SINCE JULY 1, 2017, DISAGGREGATED BY:

A. WAGES;
B. BENEFITS;
C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);
D. INFORMATION TECHNOLOGY;
E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS
CALCULATED);
F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE “OTHER” IS).

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

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

RESPONSE:

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

RESPONSE PROVIDED BY: Black & Veatch Management Consulting, LLC
PA-III-16. PLEASE PROVIDE A DETAILED EXPLANATION OF THE DOLLAR AMOUNT BY WHICH THE 25% “CONTINGENCY” FOR TAP ADMINISTRATIVE COSTS CURRENTLY BEING COLLECTED IN PWD RATES WAS ACCESSED BY MONTH FOR EACH MONTH JULY 2017 TO PRESENT.

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

RESPONSE:

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

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

RESPONSE:

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

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-18. PLEASE DEFINE THE TERMS:

   A. BILLINGS
   
   B. PAYMENTS
   
   C. TOTAL PERCENT COLLECTED

RESPONSE:

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

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

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

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-19. IN ASSESSING COLLECTIONS FOR PWD, PLEASE:

A. DEFINE THE TERM “RECEIPTS”

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

RESPONSE:

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

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

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

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

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

RESPONSE PROVIDED BY: Black & Veatch Management Consulting, LLC
PA-III-20. PLEASE PROVIDE A COPY OF ALL AGENDAS AND ALL MINUTES OF TAP ADVISORY COMMITTEE MEETINGS FROM JULY 1, 2017 TO PRESENT.

RESPONSE:

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

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

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

RESPONSE:

Please see response to PA-III-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-III-22. PLEASE PROVIDE A COPY OF ALL WRITTEN PRESENTATIONS, MEMOS OR OTHER WRITTEN DOCUMENTS OF ANY NATURE FROM PWD OR WRB (INCLUDING THEIR CONSULTANTS) PROVIDED TO CITY COUNCIL, THE WATER BOARD, OR ANY OTHER PHILADELPHIA MUNICIPAL ENTITY OR OFFICIAL REGARDING TAP FROM JULY 2017 TO PRESENT.

RESPONSE:

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

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

RESPONSE PROVIDED BY: Philadelphia Water Department, Water Revenue Bureau, Raftelis Financial Consultants, Inc., and Black & Veatch Management Consulting, LLC.
PA-III-23. PLEASE PROVIDE A COPY OF ALL PRESENTATIONS BY A PWD OR WRB OFFICIAL (INCLUDING RAFTELLIS AND/OR BLACK AND VEATCH PERSONNEL TESTIFYING IN THIS PROCEEDING) TO A CONFERENCE, SEMINAR, OR OTHER PUBLIC OR INDUSTRY GATHERING REGARDING TAP FROM JULY 2017 TO PRESENT.

RESPONSE:

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

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

RESPONSE:

Authors include personnel testifying in this proceeding. The publication can be found at 

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

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

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

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

A. EACH DAILY AND WEEKLY CUSTOMER ASSISTANCE APPLICATION PROCESSING REPORT;
B. EACH REPORT PROVIDING MONTHLY PROGRAM STATISTICS;
C. EACH PERIODIC COST OF PROGRAM REPORT;
D. EACH ANNUAL CITY COUNCIL-REQU IRED REPORT; AND
E. EACH OTHER AD HOC AND PERIODIC REPORTS TO SUPPORT MANAGEMENT OF TAP THAT HAS BEEN REQUESTED AND DEVELOPED.

RESPONSE:

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

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

A. EACH REPORT REPORTING THE NUMBER OF TAP APPLICATIONS REQUESTED, BY METHOD REQUESTED;
B. EACH REPORT REPORTING THE NUMBER OF TAP APPLICATIONS SUBMITTED, BY METHOD SUBMITTED;
C. EACH REPORT REPORTING THE NUMBER OF APPLICATIONS BY STATUS CHANGE;
D. EACH REPORT REPORTING THE NUMBER OF CUSTOMERS BY PROGRAM ENROLLED;
E. EACH REPORT REPORTING TAP PARTICIPATION LEVELS;
F. EACH REPORT REPORTING TAP DISCOUNT AMOUNTS;
G. EACH REPORT REPORTING TAP BILL PAYMENTS.

RESPONSE:

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

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

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-27. PLEASE PROVIDE IN EXCEL FORMAT THE NUMBER OF TAP PARTICIPANTS AS OF THE END OF THE MONTH BY MONTH FOR EACH MONTH JANUARY 2017 TO PRESENT.

RESPONSE:

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

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

RESPONSE:

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

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PHILADELPHIA WATER DEPARTMENT
Response to PA Interrogatory

PA-III-29. PLEASE PROVIDE BY YEAR FOR THE YEARS 2017 TO PRESENT INCLUSIVE:

A. AVERAGE NUMBER OF CONFIRMED LOW-INCOME CUSTOMERS.
B. AVERAGE NUMBER OF ESTIMATED LOW-INCOME CUSTOMERS.

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

RESPONSE:

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

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PHILADELPHIA WATER DEPARTMENT
Response to PA Interrogatory

PA-III-30. IN EXCEL FORMAT, PROVIDE A LIST OF EACH CENSUS TRACT
COMPRISING, IN WHOLE OR PART, THE PWD SERVICE TERRITORY.

RESPONSE:

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

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

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-III-32. IN THE AGING REPORTS MAINTAINED BY PWD, PROVIDE FOR EACH “ROUTE” REFERENCED:

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

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-III-33. IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD,
PLEASE PROVIDE A DETAILED EXPLANATION OF WHAT CUSTOMERS
ARE INCLUDED IN THE POPULATION LABELLED “TAP CUSTOMERS
OUTSIDE OF TAP ENROLLMENT.”

RESPONSE:

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

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

RESPONSE:

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

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD,
PLEASE PROVIDE A DETAILED EXPLANATION OF HOW “TAP
CUSTOMERS OUTSIDE OF TAP ENROLLMENT” WERE IDENTIFIED
PRIOR TO FISCAL YEAR 2018.

RESPONSE:
Please see the response to PA-III-34.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-36. IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD,
PLEASE PROVIDE A DETAILED EXPLANATION OF WHY CUSTOMERS
WHO ARE LABELLED “SENIOR CITIZEN DISCOUNT” ARE COMBINED
WITH CUSTOMERS WHO ARE LABELLED “TAP” FOR PURPOSES OF
CALCULATING COLLECTABILITY.

RESPONSE:

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

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

RESPONSE:

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

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-38. PLEASE PROVIDE ALL COLLECTABILITY STUDIES PREPARED BY OR FOR PWD WITH DATA THROUGH JANUARY DECEMBER 2020.

RESPONSE:

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

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-III-39. FOR EACH ZIP CODE, PROVIDE:
   A. THE NUMBER OF RESIDENTIAL CUSTOMERS IN THAT ZIP CODE;
   B. THE NUMBER OF CONFIRMED LOW-INCOME CUSTOMERS IN THAT ZIP CODE; AND
   C. THE NUMBER OF TAP PARTICIPANTS SERVED IN THAT ZIP CODE.

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Raftelis Financial Consultants, Inc.
PA-III-40. IN EXCEL FORMAT, FOR THE MOST RECENT 12 MONTH PERIOD AVAILABLE, PLEASE PROVIDE ANY INFORMATION THAT IS AVAILABLE THAT IS BROKEN DOWN GEOGRAPHICALLY (E.G., ZIP CODE, CENSUS TRACT) REGARDING RESIDENTIAL CUSTOMERS’:

A. AMOUNT OF BILLED REVENUE (IN DOLLARS);
B. PAYMENTS (IN DOLLARS);
C. ARREARS (IN DOLLARS);
D. NUMBER OF BILLS RENDERED;
E. NUMBER OF PAYMENTS RECEIVED;
F. NUMBER OF ACCOUNTS IN ARREARS;
G. NUMBER OF DISCONNECTIONS;
H. NUMBER OF RECONNECTIONS.

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

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

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