

PHILADELPHIA WATER DEPARTMENT
PUBLIC ADVOCATE ADVANCED DISCOVERY SET #I

RESPONSE TO
PUBLIC ADVOCATE'S ADVANCED INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTION 3

Dated: February 2021

1 **RESPONSE TO PUBLIC ADVOCATE’S ADVANCED INTERROGATORIES**
2 **AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

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5 **PA-ADV-3.** FOR EACH CUSTOMER TYPE SHOWN IN REVENUE PROJECTIONS, ITEM
6 1(D), TABLE 1, EXCLUDING TAP PARTICIPANTS, PROVIDE:

- 7 A. THE AVERAGE DELINQUENT BALANCE OWED AS OF DECEMBER 2019.
8 B. THE AVERAGE DELINQUENT BALANCE OWED AS OF DECEMBER 2020.
9 C. THE TOTAL DELINQUENT BALANCE AS OF DECEMBER 2019.
10 D. THE TOTAL DELINQUENT BALANCE AS OF DECEMBER 2020.
11 E. THE PERCENTAGE OF TOTAL DELINQUENT BALANCE ON A PAYMENT
12 AGREEMENT AS OF DECEMBER 2019.
13 F. THE PERCENTAGE OF TOTAL DELINQUENT BALANCE ON A PAYMENT
14 AGREEMENT AS OF DECEMBER 2020

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16 **RESPONSE:**

17 TAP participants, defined as customers that received a TAP bill during the preceding month, were
18 excluded from these data. Delinquency was determined by subtracting the amount of the most
19 recent month’s bill from each account’s overall balance as of each of the dates in question. This
20 represents “delinquent balance owed”. The debt included may be in payment agreements,
21 bankruptcy, or other protected statuses. Delinquency is defined the same way as “in arrears” as
22 described in PA-ADV-1 item B.

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24 PA-ADV-3_Attachment tab ‘December 2019’ shows the total delinquent balance, and percentage
25 of total delinquent balance on a payment agreement as of December 2019. PA-ADV-
26 3_Attachment tab ‘December 2020’ shows the total delinquent balance, and percentage of total
27 delinquent balance on a payment agreement as of December 2020. Note that some debt is
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1 protected from immediate enforcement, during normal operations, by mechanisms other than
2 being in a payment agreement.

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