

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-22

Dated: March 2021

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

- 3 A. THE TOTAL AMOUNT OF FEES PWD HAS PAID TO DOCKET LIENS ON
4 ALL RESIDENTIAL ACCOUNTS;
- 5 B. THE TOTAL AMOUNT OF FEES PWD HAS PAID TO DOCKET LIENS ON
6 ALL ACCOUNTS THAT WERE TAP ACCOUNTS AT THE TIME THE LIEN
7 WAS DOCKETED;
- 8 C. THE TOTAL AMOUNT OF LIEN DOCKETING FEES THAT HAVE BEEN
9 BILLED TO TAP PARTICIPANTS.

10
11 **RESPONSE:**

- 12 A. PWD has not paid any fees to docket liens on residential accounts since 2017.
- 13 B. PWD has not paid any fees to docket liens on TAP accounts since 2017.
- 14 C. The total amount of lien docketing fees that have been billed to TAP participants is
15 \$523,276.90.

16
17 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-2.** PLEASE PROVIDE A DETAILED DESCRIPTION OF HOW THE AMOUNT
2 OF A LIEN ON AN ARREARAGE OWED BY A TAP RECIPIENT IS
3 ADJUSTED TO ACCOUNT FOR PENALTIES AND INTEREST, WHICH
4 SHOULD HAVE BEEN SUBJECT TO FORGIVENESS UNDER THE TERMS
5 OF THE TAP PROGRAM.
6

7 **RESPONSE:**

8 When the debt is forgiven, the liens are vacated.
9

10 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-3.** REFERENCE: STATEMENT 5 (PAGE 5). PLEASE PROVIDE IN A LIVE
2 EXCEL SPREADSHEET WITH ALL FORMULAE INTACT THE
3 CALCULATION FOR THE STATEMENT THAT IT IS POSSIBLE TO
4 PERFORM ONLY 400 SERVICE DISCONNECTIONS PER DAY.

5
6 **RESPONSE:**

7 No excel sheet exists. The estimate was provided based on staffing levels to complete
8 restorations of service and shut offs.

9
10 **RESPONSE PROVIDED BY:** Philadelphia Water Department

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-4.** REFERENCE: STATEMENT 5 (PAGE 5). PLEASE PROVIDE IN A LIVE
2 EXCEL SPREADSHEET BY WEEK SINCE NOVEMBER 30, 2020, THE
3 NUMBER OF:

4 A. TOTAL RESIDENTIAL ACCOUNTS ELIGIBLE FOR NONPAYMENT
5 SERVICE DISCONNECTION ABSENT THE MORATORIUM;

6 B. TOTAL TAP ACCOUNTS ELIGIBLE FOR NONPAYMENT SERVICE
7 DISCONNECTION ABSENT THE MORATORIUM;

8 C. TOTAL NUMBER OF COMMERCIAL ACCOUNTS ELIGIBLE FOR
9 NONPAYMENT SERVICE DISCONNECTION ABSENT THE
10 MORATORIUM.

11
12 **RESPONSE:**

13 Please see response attachment PA-VIII-4 Weekly Accounts Eligible for Shutoff.
14

15 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-5.** REFERENCE: STATEMENT 5 (PAGE 5). PLEASE PROVIDE EACH
2 REVISION TO “COLLECTION PROTOCOLS” IMPLEMENTED SINCE
3 JANUARY 1, 2020:

- 4 A. TO ENCOURAGE CUSTOMER PAYMENT OF OUTSTANDING BILLS
5 DURING THE MORATORIUM;
6 B. TO FACILITATE THE NEGOTIATION OF STANDARD PAYMENT
7 AGREEMENTS;
8 C. TO FACILITATE THE FILING OF TAP RECERTIFICATIONS;
9 D. TO FACILITATE THE APPLICATION FOR TAP;
10 E. TO ENSURE UNINTERRUPTED SERVICE WHEN THE SHUTOFF
11 MORATORIUM IS LIFTED.

12
13 **RESPONSE:**

- 14 A. The City utilized a call campaign and blog posts to inform customers of their options
15 to pay bills during the moratorium. The language used in the Delinquency Notices was
16 also softened during the moratorium. The Delinquency Notices were not sent to TAP
17 participants. Please see response attachment PA-VIII-5 Outreach During Moratorium.
18 B. An outbound call campaign was directed towards customers who missed payment
19 agreement installments. In addition, during the moratorium, payment agreements
20 ceased being marked as breached for missed payments.
21 C. TAP recertifications can now be submitted online. In addition, WRB is proactively
22 reaching out to TAP customers through a mass mailing campaign encouraging them to
23 contact WRB with updated information regarding financial or household information.
24 TAP customers can update WRB by filling out and returning the application enclosed
25 within the mailing.
26 D. Please refer to answer PA-VIII-5(C). Customers can now begin an application and
27 save it in order to complete and submit at a later time. Additionally, documents for
28 incomplete applications can now be completed and submitted entirely online.

1 E. There were no residential customers shut offs for non-payment in 2020 and there will
2 not be any shut offs in calendar year 2021. When the shut off moratorium is lifted, all
3 residential customers will be evaluated for delinquent debt and shutoff notices will be
4 sent with the standard 30-day notice prior to shut offs commencing.

5
6 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne A.
7 Muhammad, Water Revenue Bureau

1 **PA-VIII-6.** REFERENCE: STATEMENT 5 (PAGE 6). PLEASE PROVIDE, BY WEEK OR
2 MONTH (WHICHEVER IS AVAILABLE) FOR JANUARY 1, 2020 TO
3 PRESENT:

- 4 A. FOR TAP APPLICANTS IN THAT WEEK, THE AVERAGE DELAY
5 BETWEEN THE DATE ON WHICH A CUSTOMER APPLIES FOR TAP AND
6 THE DATE ON WHICH A CUSTOMER IS ENROLLED IN TAP;
7 B. FOR TAP PARTICIPANTS FILING RECERTIFICATION IN THAT WEEK,
8 THE AVERAGE DELAY BETWEEN THE DATE ON WHICH A TAP
9 PARTICIPANT FILES FOR RECERTIFICATION AND THE DATE ON
10 WHICH A CUSTOMER IS RECERTIFIED;
11 C. FOR LOW-INCOME CUSTOMERS REQUESTING A TAP APPLICATION,
12 THE AVERAGE DELAY BETWEEN THE DATE ON WHICH A CUSTOMER
13 REQUESTS A TAP APPLICATION AND THE DATE ON WHICH A
14 CUSTOMER IS PROVIDED A TAP APPLICATION.

15
16 **RESPONSE:**

- 17 A. The following table summarizes the number of days between application receipt by
18 WRB and enrollment in TAP, for applicants enrolled in TAP, for applicants received in
19 a given week. If an application is initially deemed incomplete and the customer provides
20 additional information to complete the application, the period of time includes the
21 incomplete period.

22

Week	Year	Average Days to TAP Enrollment
1	2020	6.9
2	2020	2.5
3	2020	2.3
4	2020	1.6
5	2020	2.2
6	2020	2.2
7	2020	3.5

23
24
25
26
27
28

PHILADELPHIA WATER DEPARTMENT
Response to PA Interrogatory

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

8	2020	2.1
9	2020	3.7
10	2020	3.5
11	2020	9.2
12	2020	8.1
13	2020	5.3
14	2020	7.5
15	2020	10.6
16	2020	9.6
17	2020	11.7
18	2020	7.7
19	2020	6.3
20	2020	3.9
21	2020	3.0
22	2020	1.8
23	2020	1.3
24	2020	0.3
25	2020	0.5
26	2020	1.1
27	2020	1.0
28	2020	0.5
29	2020	0.0
30	2020	0.3
31	2020	0.1
32	2020	0.7
33	2020	0.5
34	2020	0.1
35	2020	1.2
36	2020	0.7
37	2020	0.3
38	2020	0.5
39	2020	0.5
40	2020	0.2
41	2020	1.1
42	2020	1.3
43	2020	1.9
44	2020	0.7
45	2020	0.9
46	2020	0.3
47	2020	0.6
48	2020	0.7
49	2020	0.6
50	2020	0.2

51	2020	0.3
52	2020	-

1
2
3
4 B. There is no existing reporting that differentiates recertification applications from other
5 applications for this purpose. Recertification applications are included in the table
6 above.

7 C. If a customer comes into WRB and requests an application be printed or uses the print
8 on demand functionality on the application website, there is no delay. It is printed
9 immediately. If an application is requested by mail, applications are typically mailed the
10 next business day. There are, however, no reports available that capture the data as
11 requested because the timeframe in which the application is delivered depends upon the
12 United States Postal Service.

13
14 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Susan M. Crosby, Water Revenue
15 Bureau, and RaVonne A. Muhammad, Water Revenue Bureau
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-7.** REFERENCE: STATEMENT 5 (PAGE 6). PLEASE PROVIDE A
2 QUANTIFICATION OF THE STATEMENT THAT “LIMITED STAFF
3 RESOURCES WILL BE STRETCHED TO THEIR LIMITS” IN TERMS OF:
4 A. THE NUMBER OF CUSTOMERS WHO WILL SEEK TO NEGOTIATE A
5 PAYMENT AGREEMENT BUT NOT RECEIVE ASSISTANCE IN
6 NEGOTIATING A STANDARD PAYMENT AGREEMENT;
7 B. THE NUMBER OF CUSTOMERS WHO WILL SEEK TO NEGOTIATE A
8 STANDARD PAYMENT AGREEMENT FOR WHOM THE ABILITY TO
9 NEGOTIATE A STANDARD PAYMENT AGREEMENT WILL BE DELAYED;
10 C. THE NUMBER OF CUSTOMERS WHO WILL SEEK TO ENROLL IN TAP
11 FOR WHOM TAP ENROLLMENT WILL BE DELAYED;
12 D. THE NUMBER OF TAP PARTICIPANTS WHO WILL SEEK TO RECERTIFY
13 FOR TAP FOR WHOM TAP RECERTIFICATION WILL BE DELAYED.

14
15 **RESPONSE:**

16 We are unable to quantify the statement due to these uncertain times, but we are monitoring
17 customer inquires, staff availability, and available resources.
18

19 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
20
21
22
23
24
25
26
27
28

- 1 **PA-VIII-8.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE COLLECTION
2 ACTIVITIES DIRECTED TOWARD A CUSTOMER IN ARREARS WHO:
3 A. HAS SOUGHT TO NEGOTIATE A STANDARD PAYMENT AGREEMENT
4 BUT FOR WHOM THE NEGOTIATION OF A STANDARD PAYMENT
5 AGREEMENT IS DELAYED;
6 B. HAS SOUGHT TO ENROLL IN TAP BUT FOR WHOM THE ABILITY TO
7 ENROLL IN TAP HAS BEEN DELAYED;
8 C. HAS SUBMITTED A TAP APPLICATION BUT FOR WHOM THE
9 PROCESSES OF THE TAP APPLICATION HAS BEEN DELAYED.

10
11 **RESPONSE:**

12 Apart from sequestration, which is only applicable to commercial or tenant occupied
13 properties, all collection activities ceased as of March 17, 2020. The sequestration process
14 prevents water shutoffs and evictions for tenants. If a sequestrator is appointed by the Court,
15 water delinquencies that are liened will be paid from rent income received by the
16 sequestrator in lieu of the landlord. The sequestration program was halted on or about March
17 6, 2020 and resumed on October 6, 2020.

18
19 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
20
21
22
23
24
25
26
27
28

- 1 **PA-VIII-9.** PLEASE PROVIDE A DETAILED EXPLANATION OF A TAP APPLICANT'S
2 PAYMENT RESPONSIBILITY FOR BILLS THAT:
- 3 A. REPRESENT A BILL FOR CURRENT SERVICE RECEIVED AFTER
4 HAVING SUBMITTED A TAP APPLICATION BUT THE PROCESSING OF
5 THAT TAP APPLICATION HAS BEEN DELAYED;
- 6 B. REPRESENT A BILL FOR CURRENT SERVICE RECEIVED AFTER
7 HAVING REQUESTED A TAP APPLICATION BUT THE PROVISION OF
8 THAT TAP APPLICATION HAS BEEN DELAYED;
- 9 C. REPRESENT AN ARREARAGE THAT WOULD BE SUBJECT TO
10 FORGIVENESS ONCE THE APPLICANT HAS BEEN ENROLLED IN TAP,
11 BUT THE PROCESSING OF THE TAP APPLICATION HAS BEEN
12 DELAYED.

13
14 **RESPONSE:**

- 15 A. Please refer to the response provided for PA-III-9. Applicants will continue to receive
16 their regular monthly bills until they are enrolled in TAP. Customers have payment
17 responsibility for bills they receive. "The processing of that TAP application has been
18 delayed" has not been defined in this question.
- 19 B. Please refer to the response provided for PA-III-9 and PA-III-6. Applicants will
20 continue to receive their regular monthly bills until they are enrolled in TAP.
21 Customers have payment responsibility for bills they receive. "The provision of that
22 TAP application has been delayed" has not been defined in this question.
- 23 C. Once a customer is enrolled in TAP for the first time, the arrearage is protected.
24 Customers in the process of applying for TAP but not yet in the program remain
25 responsible for paying any bills generated. The phrase "processing of the TAP
26 application has been delayed" is not defined in this question.

27 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants and Susan M. Crosby, Water
28 Revenue Bureau

1 **PA-VIII-10.** REFERENCE: STATEMENT 5 (PAGE 9). PLEASE PROVIDE A DETAILED
2 EXPLANATION OF ALL CIRCUMSTANCES IN WHICH A TAP
3 PARTICIPANT WOULD BE FORCED TO SATISFY A LIEN FOR ARREARS
4 ON WHICH COLLECTION HAS BEEN SUSPENDED AND REPRESENT
5 PREPROGRAM ARREARS THAT WOULD BE SUBJECT TO
6 FORGIVENESS. IF NO SUBJECT CIRCUMSTANCES EXIST, PLEASE SO
7 INDICATE.
8

9 **RESPONSE:**

10 A TAP participant would not be forced to satisfy a lien for arrears unless they leave the TAP
11 program. If they leave the program due to a change in income eligibility which no longer
12 qualifies them for TAP, and the customer's account has liens on debt for preprogram arrears
13 that qualify for forgiveness, partial forgiveness will be granted in a percentage equal to the
14 number of full monthly payments the customer has made while in TAP divided by 24. That
15 forgiveness may satisfy a part or the entirety of liens on debt for preprogram arrears. The
16 former TAP participant will be responsible for the remaining arrears.
17

18 If a TAP participant opts-out of the program, fails to recertify timely, or is otherwise
19 removed from the program, they will be responsible for the entirety of liens for any
20 remaining pre-program arrears.
21

22 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
23
24
25
26
27
28

1 **PA-VIII-11.** REFERENCE: STATEMENT 5 (PAGE 9). ASSUME HYPOTHETICALLY
2 THAT A TAP RECIPIENT HAS PREPROGRAM ARREARS SUBJECT TO
3 FORGIVENESS THAT HAVE BEEN MADE SUBJECT TO A LIEN. THE TAP
4 PARTICIPANT SEEKS TO SELL THE PARTICIPANT'S HOME AND THE
5 PROSPECTIVE BUYER BECOMES AWARE OF THE LIEN. PROVIDE A
6 DETAILED EXPLANATION OF WHAT HAPPENS TO THOSE
7 PREPROGRAM ARREARS THAT ARE SUBJECT TO FORGIVENESS BUT
8 ALSO SUBJECT TO A LIEN?
9

10 **RESPONSE:**

11 If the preprogram arrears are not paid prior to the sale, the entire account balance, including
12 any preprogram arrears, is transferred to the new owner's account.
13

14 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-12.** REFERENCE: STATEMENT 5 (PAGE9). ASSUME HYPOTHETICALLY
2 THAT A TAP RECIPIENT HAS PREPROGRAM ARREARS SUBJECT TO
3 FORGIVENESS THAT HAVE BEEN MADE SUBJECT TO A LIEN. THE TAP
4 PARTICIPANTS SEEKS TO REFINANCE THE PARTICIPANT’S HOME
5 THROUGH A STATE OR LOCAL PROGRAM THAT WOULD PROVIDE FOR
6 A LOWER MORTGAGE PAYMENT. PROVIDE A DETAILED
7 EXPLANATION OF WHAT HAPPENS TO THOSE PREPROGRAM
8 ARREARS THAT ARE SUBJECT TO FORGIVENESS BUT ALSO SUBJECT
9 TO A LIEN?
10

11 **RESPONSE:**

12 If the refinancing requires the satisfaction of open liens including any liens on debt for
13 preprogram arrears that qualify for forgiveness, the arrears must be paid.
14

15 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-13.** PLEASE PROVIDE A DETAILED EXPLANATION OF ALL INSTANCES IN
2 WHICH THE FORGIVENESS OF PREPROGRAM ARREARS THAT ARE
3 SUBJECT TO FORGIVENESS BUT ARE ALSO SUBJECT TO A LIEN WILL
4 HAVE THEIR FORGIVENESS ACCELERATED.

5
6 **RESPONSE:**

7 If a TAP participant leaves the program due to a change in income eligibility which no
8 longer qualifies them for TAP, and the customer's account has liens on debt for preprogram
9 arrears that qualify for forgiveness, partial forgiveness will be granted in a percentage equal
10 to the number of full monthly payments the customer has made while in TAP divided by
11 24. That forgiveness may satisfy a part or the entirety of liens on debt for preprogram
12 arrears.

13
14 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-14.** REFERENCE STATEMENT 7B (PAGE 14): PLEASE EXPLAIN THE
2 STATEMENT “WHEN ARREARS ARE FORGIVEN, THE ASSOCIATED
3 LIEN IS ALSO REMOVED FROM THE CUSTOMER’S PROPERTY.”
4 SPECIFICALLY, PLEASE CONFIRM THAT THE \$91.45 FILING FEE IS
5 FORGIVEN WITH THE ARREARS.

6
7 **RESPONSE:**

8 Denied. The lien filing fee is cancelled when the arrears are forgiven.
9

10 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-15.** ASSUME HYPOTHETICALLY THAT A TAP RECIPIENT HAD
2 PREPROGRAM ARREARS FOR WHICH THE CITY OBTAINED A
3 JUDGMENT IN MUNICIPAL COURT. ASSUME FURTHER THAT THE TAP
4 RECIPIENT HAS EARNED FORGIVENESS OF THOSE PREPROGRAM
5 ARREARS. PLEASE PROVIDE A DETAILED EXPLANATION OF WHAT
6 THE TAP CUSTOMER MUST DO TO HAVE THE MUNICIPAL COURT
7 JUDGMENT SATISFIED.

8
9 **RESPONSE:**

10 If the balance of the judgment falls to \$0 as a result of the forgiveness, the judgments will
11 be satisfied. The TAP customer does not need to do anything to have the judgment
12 satisfied.

13
14 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-16.** REFERENCE: STATEMENT 5 (PAGE 12). PLEASE PROVIDE ALL DATA
2 AND / OR ANALYSIS THAT SUPPORTS THE ASSERTION THAT:

3 A. THE CITED REDUCTION IN PAYMENT ARRANGEMENTS IS
4 ATTRIBUTABLE, IN WHOLE OR PART, TO “THE SUSPENSION OF MOST
5 COLLECTION ACTIVITIES.”

6 B. THE CITED REDUCTION IN PAYMENT ARRANGEMENTS IS
7 ATTRIBUTABLE, IN WHOLE OR PART, TO “THE RESTORATION OF
8 SERVICE FOR SUSPENDED ACCOUNTS.”

9 C. THE CITED REDUCTION IN PAYMENT ARRANGEMENTS IS
10 ATTRIBUTABLE, IN WHOLE OR PART, TO “THE MORATORIUM ON
11 UTILITY SHUT-OFFS.”
12

13 **RESPONSE:**

14 There are no documents or reports responsive to this request; however, the City’s
15 assertions are supported by *Pa. utilities urge a resumption of shutoff as pandemic subsides*
16 *and unpaid bills soar* published by The Philadelphia Inquirer. Andrew Maykuth, *Pa.*
17 *utilities urge a resumption of shutoff as pandemic subsides and unpaid bills soar*, The
18 Philadelphia Inquirer. (February 20, 2021),
19 [https://www.inquirer.com/business/pennsylvania-utilities-shutoff-ban-coronavirus-covid-
20 20210220.html?utm_medium=email&utm_campaign=Morning%20email%202-20-
21 21&utm_content=Morning%20email%202-20-
22 21+CID_ad7912f6237f32cfa0d4bb73c81f1ba0&utm_source=newsletter_edit&utm_term=
23 Pennsylvania%20utilities%20are%20urging%20to%20resume%20shutoffs](https://www.inquirer.com/business/pennsylvania-utilities-shutoff-ban-coronavirus-covid-20210220.html?utm_medium=email&utm_campaign=Morning%20email%202-20-21&utm_content=Morning%20email%202-20-21+CID_ad7912f6237f32cfa0d4bb73c81f1ba0&utm_source=newsletter_edit&utm_term=Pennsylvania%20utilities%20are%20urging%20to%20resume%20shutoffs).

24
25 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
26
27
28

1 **PA-VIII-17.** REFERENCE: STATEMENT 5 (PAGE 12). PLEASE PROVIDE A COPY OF
2 ALL DATA AND/OR ANALYSIS IN THE POSSESSION OR CONTROL OF
3 WRB OR PWD SUPPORTING THE ASSERTION THAT THE SUSPENSION
4 OF COLLECTION ACTIVITIES, THE RESTORATION OF SERVICE FOR
5 SUSPENDED ACCOUNTS, AND THE MORATORIUM ON UTILITY SHUT-
6 OFFS “IN COMBINATION, LESSENE ANY INCENTIVE TO SEEK
7 ASSISTANCE THROUGH USE OF PAYMENT AGREEMENTS OR OTHER
8 PAYMENT ARRANGEMENTS.”
9

10 **RESPONSE:**

11 Please see response to PA-VIII-16.
12

13 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-18.** REFERENCE: STATEMENT 5 (PAGE 12). PLEASE PROVIDE A COPY OF
2 ALL DATA AND/OR ANALYSIS THAT DOCUMENTS OR
3 DEMONSTRATES THAT “REDUCED PARTICIPATION LEVELS” “ARE
4 LIKELY TIED” TO A “LESSEned INCENTIVE TO SEEK ASSISTANCE
5 THROUGH USE OF PAYMENT AGREEMENTS OR OTHER PAYMENT
6 ARRANGEMENTS” RATHER THAN BEING “LIKELY TIED” TO THE
7 “DELAYS IN RESPONDING TO CUSTOMERS AND LONGER PROCESSES
8 TIMES FOR CUSTOMER SERVICE AND CUSTOMER ASSISTANCE
9 APPLICATIONS” DESCRIBED BY STATEMENT 5, PAGE 6.

10
11 **RESPONSE:**

12 Please see response to PA-VIII-16.

13
14 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-19.** REFERENCE: STATEMENT 5 (PAGE 15). PLEASE PROVIDE A DETAILED
2 DESCRIPTION OF ALL CIRCUMSTANCES THAT WOULD MERIT
3 “ARREARAGE MANAGEMENT ON A CASE-BY-CASE BASIS.” DESCRIBE
4 ALL CIRCUMSTANCES UNDER WHICH A CUSTOMER WOULD BE A
5 “CASE” IN WHICH ARREARAGE MANAGEMENT WOULD BE
6 IMPLEMENTED.

7
8 **RESPONSE:**

9 Any customer with an unpaid balance may contact WRB for arrearage management. The
10 type of agreement established will depend on specific circumstances such as income
11 eligibility or whether the water is currently shut off at the property. See also PWD Reg.
12 100.9 Payment Agreements.

13
14 In general, the appropriateness of a payment agreement is determined on a case by case
15 basis. For example, any household with income between 150% and 250% of the Federal
16 Poverty level may apply for an agreement longer than the standard 12- or 18- months
17 agreement authorized in the PWD Regulations. See PWD Reg. 100.9(c).

18
19 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
20
21
22
23
24
25
26
27
28

1 **PA-VIII-20.** REFERENCE: STATEMENT 5 (PAGE 15). PLEASE PROVIDE A DETAILED
2 DESCRIPTION OF ALL CIRCUMSTANCES THAT WOULD MAKE
3 OFFERING 12-MONTH OR 18-MONTH ARREARAGE MANAGEMENT
4 PROGRAMS TO CUSTOMERS “APPROPRIATE.” WHAT
5 CIRCUMSTANCES WOULD DISTINGUISH WHEN A 12-MONTH OR 18-
6 MONTH ARREARAGE MANAGEMENT PROGRAM WOULD BE
7 INAPPROPRIATE FROM WHEN A 12-MONTH OR 18-MONTH
8 ARREARAGE MANAGEMENT PROGRAM WOULD BE “APPROPRIATE.”
9

10 **RESPONSE:**

11 A 12- or 18-month regular payment agreement would not be appropriate in cases where
12 the balance would result in payments of less than \$20 per month. However, TAP payment
13 agreements can have a lower than \$20 payment. In general, the appropriateness of
14 payment agreements is determined on a case by case basis.
15

16 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-21.** REFERENCE: STATEMENT 5 (PAGE 12). PLEASE PROVIDE A DETAILED
2 DESCRIPTION OF ALL OUTREACH NEWLY PROVIDED TO CUSTOMERS
3 IN ARREARS SINCE MARCH 1, 2020 EXPLAINING HOW TO NEGOTIATE
4 A STANDARD PAYMENT ARRANGEMENT. PROVIDE PHYSICAL COPIES
5 OF SUCH OUTREACH IF PHYSICAL COPIES EXIST.
6

7 **RESPONSE:**

8 WRB commenced a call campaign for customers who, under normal circumstances, would
9 have breached a payment agreement. They are informed of the customer assistance
10 programs available including TAP.
11

12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne A.
13 Muhammad, Water Revenue Bureau
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-22.** REFERENCE: STATEMENT 5 (PAGE 12). PLEASE INDICATE WHETHER,
2 WHEN PWD RESTORES ACCOUNTS THAT HAVE BEEN PREVIOUSLY
3 DISCONNECTED:

4 A. DOES PWD CHARGE A FEE FOR ACCOUNT RESTORATION;

5 B. IF PWD DOES CHARGE A FEE FOR ACCOUNT RESTORATION, DOES
6 PWD DISTINGUISH THE FEE WHICH IS CHARGED TO TAP AND TO NON-
7 TAP CUSTOMERS;

8 C. IN DECIDING WHETHER TO RESTORE SERVICE, ARE ALL ACCOUNTS
9 THAT HAD BEEN DISCONNECTED RESTORED OR DOES PWD
10 DISTINGUISH BETWEEN ACCOUNTS THAT DEVELOPED ARREARS
11 SUBSEQUENT TO A DESIGNATED DATE (E.G., MARCH 1, 2020) AND
12 ACCOUNTS THAT HAVE ARREARAGES PRE-EXISTING A DESIGNATED
13 DATE.

14
15 **RESPONSE:**

16 A. Yes.

17 B. Reconnection fees for TAP customers are distinguished as follows:

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

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

20 C. No accounts have been shut off since March 17, 2020. Every account that was shutoff
21 was restored without charge unless it was unsafe to do so.

22
23 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne A.
24 Muhammad, Water Revenue Bureau
25
26
27
28

1 **PA-VIII-23.** REFERENCE: STATEMENT 5 (PAGE 15). PLEASE PROVIDE A
2 COMPLETE LIST OF “SERVICE VIOLATIONS” THAT WOULD MERIT A
3 DISCONNECTION OF SERVICE, RESTORATION OF WHICH WOULD
4 ENTAIL A RESTORATION CHARGE AS IDENTIFIED BY STATEMENT 5,
5 PAGE 15.

6
7 **RESPONSE:**

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

9
10 **RESPONSE PROVIDED BY:** Philadelphia Water Department

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-24.** PLEASE PROVIDE BY MONTH FOR THE MONTHS JULY 2019 TO
2 PRESENT THE DOLLAR AMOUNT OF PENALTIES AND INTEREST THAT
3 HAVE BEEN FORGIVEN THROUGH TAP.
4

5 **RESPONSE:**

6 The following table summarizes penalty and principal amounts forgiven for each month,
7 July 2019 to December 2020.
8

9

Month	Year	Penalty Amount Forgiven	Principal Amount Forgiven
7	2019	\$4,810.00	\$-
8	2019	\$48,213.07	\$-
9	2019	\$91,870.73	\$-
10	2019	\$71,617.20	\$-
11	2019	\$67,647.56	\$-
12	2019	\$113,539.08	\$-
1	2020	\$119,993.04	\$-
2	2020	\$107,286.47	\$-
3	2020	\$145,040.48	\$-
4	2020	\$127,908.51	\$-
5	2020	\$203,392.38	\$-
6	2020	\$156,253.23	\$-
7	2020	\$275,896.57	\$-
8	2020	\$922,666.48	\$-
9	2020	\$290,383.68	\$-
10	2020	\$258,151.05	\$1,179.00
11	2020	\$175,642.34	\$1,113.00
12	2020	\$169,394.84	\$-

10
11
12
13
14
15
16
17
18
19
20
21
22

23 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
24
25
26
27
28

1 **PA-VIII-25.** PLEASE PROVIDE A DETAILED DESCRIPTION OF HOW A TAP
2 PARTICIPANT’S PRE-PROGRAM ARREARS NOT COMPRISED OF
3 PENALTIES AND INTEREST, AND A TAP PARTICIPANT’S PRE-
4 PROGRAM ARREARS THAT ARE COMPRISED OF PENALTIES AND
5 INTEREST, ARE SEPARATELY TRACKED, IF AT ALL, FOR PURPOSES OF
6 ARREARAGE FORGIVENESS? PLEASE EXPLAIN WHY, IF AT ALL,
7 PENALTIES AND INTEREST WOULD NOT BE SUBJECT TO AN EARLIER
8 FORGIVENESS GIVEN THAT THE ARREARAGE FORGIVENESS FOR
9 PENALTIES AND INTEREST BEGAN AT AN EARLIER DATE.

10
11 **RESPONSE:**

12 Customer account penalties are tracked separately in the water billing system by a specific
13 code that identifies them as penalties. This code allows the arrearage forgiveness
14 processes to clearly identify penalty and non-penalty debt. The penalty Forgiveness
15 Program was, in fact, implemented earlier than the Principal Forgiveness Program.
16 Penalty forgiveness was implemented starting in June 2019 and principal forgiveness was
17 implemented starting in September 2020.

18
19 **RESPONSE PROVIDED BY:** Water Revenue Bureau
20
21
22
23
24
25
26
27
28

1 **PA-VIII-26.** PLEASE INDICATE WHETHER A RESIDENTIAL CUSTOMER WHO IS A
2 TENANT, WHO HAS A LEASE OBLIGATION TO PAY PWD BILLS ON A
3 DOLLAR-FOR-DOLLAR PASSTHROUGH BASIS, MAY PARTICIPATE IN
4 TAP. PROVIDE A DETAILED EXPLANATION OF WHY NOT, IF SUCH A
5 TENANT IS NOT PERMITTED TO PARTICIPATE.
6

7 **RESPONSE:**

8 As long as a residential customer who is a tenant has a tenant account and is eligible for
9 TAP, they can participate in TAP.
10

11 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne
12 Muhammad, Water Revenue Bureau
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-27.** ASSUME HYPOTHETICALLY THAT A TENANT HAS A LEASE
2 OBLIGATION TO PAY PWD BILLS ON A DOLLAR-FOR-DOLLAR BASIS
3 EVEN THOUGH THE PWD BILL IS IN THE LANDLORD'S NAME.
4 ASSUME FURTHER THAT THE TENANT IS SUCCESSFUL IN PLACING
5 THE PWD ACCOUNT IN THE TENANT'S NAME. PROVIDE A DETAILED
6 DESCRIPTION OF HOW, IF AT ALL, THE TENANT IS ALLOWED TO GAIN
7 ACCESS TO ARREARAGE FORGIVENESS FOR ANY PREVIOUSLY
8 UNPAID PWD BILLS.

9
10 **RESPONSE:**

11 Generally, a tenant account is not retroactive, it begins as of the date it is approved and a
12 landlord's debt is not automatically transferred to that account. However, a tenant may
13 contact the Law Department and request the balance be transferred. Only the balance
14 transferred would be eligible for forgiveness.

15
16 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-28.** ASSUME HYPOTHETICALLY THAT A TENANT HAS A LEASE
2 OBLIGATION TO PAY PWD BILLS ON A DOLLAR-FOR-DOLLAR BASIS
3 EVEN THOUGH THE PWD BILL IS IN THE LANDLORD'S NAME.
4 ASSUME FURTHER THAT THE TENANT IS SUCCESSFUL IN PLACING
5 THE PWD ACCOUNT IN THE TENANT'S NAME. PLEASE PROVIDE A
6 DETAILED DESCRIPTION OF THE PROCESS THAT IS REQUIRED FOR
7 THE TENANT TO PLACE ANY PREVIOUSLY UNPAID BILLS IN THE
8 TENANT'S NAME.

9
10 **RESPONSE:**

11 The standard procedure is that a tenant account begins accruing a balance as of the date it
12 is approved and does not transfer previous balances from a landlord's account. To place
13 any previously unpaid bills in the tenant's name, the tenant must contact the Law
14 Department and request the balance be transferred.

15
16 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-29.** PLEASE PROVIDE A DETAILED DESCRIPTION OF WHAT CONSENT, IF
2 ANY, IS NEEDED BY A TENANT FROM A LANDLORD FOR PWD TO
3 PLACE A PWD ACCOUNT IN THE TENANT'S NAME.
4

5 **RESPONSE:**

6 A tenant must present satisfactory evidence of the landlord's permission to reside in the
7 property. This evidence may include a current rental agreement or agreement of sale for
8 the unit, a lease, a rent book, money order receipts, canceled checks, other utility bills in
9 the applicant's name at that address, rent receipts, or other written evidence of tenancy or
10 written evidence of the landlord's consent to occupancy. See PWD Reg. 100.2 Application
11 for Service as Residential Customers.
12

13 Once satisfactory evidence is presented, a letter will be mailed to the landlord notifying
14 them of the request to open a tenant account. The landlord has to ability to approve or
15 deny the tenant account by mailing a response back to WRB. If a landlord does not reply,
16 they are considered to have approved the opening of the account.
17

18 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-30.** PLEASE PROVIDE A DETAILED DESCRIPTION OF THE
2 DOCUMENTATION THAT A TENANT IS REQUIRED TO SUBMIT WHEN A
3 TENANT SUBMITS AN APPLICATION FOR A PWD TENANT ACCOUNT.
4 FOR EACH ITEM IDENTIFIED PLEASE PROVIDE THE POLICY OR PWD
5 REGULATION THAT REQUIRES THE DOCUMENTATION.
6

7 **RESPONSE:**

8 Please refer to PWD Reg 100.2 Application for Service.
9

10 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-31.** PLEASE PROVIDE A DETAILED DESCRIPTION OF UNDER WHAT
2 CIRCUMSTANCES, IF ANY, A LANDLORD'S CONSENT TO PLACING A
3 PWD BILL IN A TENANT'S NAME WILL BE DEEMED TO HAVE BEEN
4 REFERRED IF AN OBJECTION TO PLACING THE ACCOUNT IN THE
5 TENANT'S NAME HAS NOT BEEN RECEIVED WITHIN A PRESCRIBED
6 TIME PERIOD.

7
8 **RESPONSE:**

9 If no response is received within twenty (20) days, the landlord is deemed to have
10 approved the account. Please refer to PWD Reg. 100.2(d)(2).

11
12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-32.** WHEN PWD'S SYSTEM FAILS TO RECEIVE TRANSMISSION OF USAGE
2 INFORMATION RESULTING IN A ZERO USAGE READING, WHAT
3 POLICIES DOES THE DEPARTMENT HAVE IN PLACE TO DETERMINE
4 WHETHER WATER IS BEING CONSUMED AT THE SERVICE ADDRESS
5 WHERE ZERO USAGE HAS BEEN IDENTIFIED? PLEASE PROVIDE A
6 COPY OF SAID POLICY.

7
8 **RESPONSE:**

9 Please refer to PWD Reg. 401.6 Non-compliant Conditions as well as response attachment
10 PA-VIII-32 Shared Responsibility Policy.

11
12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-33.** WHEN PWD'S SYSTEM FAILS TO RECEIVE TRANSMISSION OF USAGE
2 INFORMATION RESULTING IN A ZERO USAGE READING, AND PWD
3 BELIEVES THAT WATER IS BEING CONSUMED AT THE SERVICE
4 ADDRESS WHERE ZERO USAGE HAS BEEN IDENTIFIED, WHAT
5 POLICIES DOES THE DEPARTMENT HAVE IN PLACE TO CORRECT THE
6 USAGE DISCREPANCY? PLEASE PROVIDE A COPY OF SAID POLICY.
7

8 **RESPONSE:**

9 Preparation of this response is in progress and will be provided in the future.
10

11 **RESPONSE PROVIDED BY:** Philadelphia Water Department
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-34.** PLEASE DESCRIBE PWD’S “SHARED RESPONSIBILITY POLICY” AND
2 THE STATUS OF THAT POLICY. PLEASE PROVIDE A COPY OF SAID
3 POLICY.
4

5 **RESPONSE:**

6 Please see response attachment PA-VIII-32 Shared Responsibility Policy. This policy is
7 still in use.
8

9 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-35.** WITHIN THE PAST FIVE (5) YEARS, ON A MONTH-BY-MONTH BASIS,
2 BY CUSTOMER TYPE, PLEASE SPECIFY THE NUMBER OF ACCOUNTS
3 THAT HAVE RECEIVED ZERO USAGE READINGS RESULTING IN
4 ESTIMATED BILLING.

5
6 **RESPONSE:**

7 Please see response attachment PA-VIII-35 Monthly Zero Usage Report.
8

9 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-VIII-36.** REFERENCE STATEMENT 7B (PAGE 14): PLEASE EXPLAIN WHAT IS
2 MEANT BY THE STATEMENT “THE PROPOSED ARREARAGE
3 FORGIVENESS PROGRAM WILL COMMENCE AT THAT TIME,”
4 REFERENCING THE DATE SEPTEMBER 1, 2021. SPECIFICALLY, PLEASE
5 CONFIRM THAT THE ARREARAGE FORGIVENESS PROGRAM HAS BEEN
6 FINALIZED AND HAS COMMENCED PURSUANT TO PWD REGULATION
7 206.7.

8
9 **RESPONSE:**

10 Confirm. The arrearage forgiveness program for TAP Customers has commenced;
11 however, recovery of those forgiven arrears has not. The intent of the response to Q17 on
12 Page 14 of PWD Statement 7B was to indicate that the incorporation of the AF-Factor
13 would not occur until the Proposed Rates and Charges go into effect on September 1,
14 2021, if approved by the Rate Board, and that the AF-Factor would initially be set to zero.

15
16 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC
17
18
19
20
21
22
23
24
25
26
27
28