BEFORE THE
PHILADELPHIA WATER, SEWER, AND STORM WATER RATE BOARD

In the Matter of the Philadelphia Water Department’s Proposed Change in Water, Wastewater, and Stormwater Rates and Related Charges: Fiscal Years 2022 – 2023 Rates and Charges to Become Effective September 1, 2021 and September 1, 2022

PUBLIC ADVOCATES DISCOVERY REQUESTS 
& REQUESTS FOR PRODUCTION OF DOCUMENTS

SET IX

PA-IX-1. In response to Public Advocate data request III-22, at page 33, which is an undated presentation by the City, there is a page titled "Assistance Successes." This page indicates that there have been 47,643 "applications submitted," while there have been 32,608 "approved applications." The page says "applicants receiving assistance" is 68%. In contrast, The response to Public Advocate data request III-25 provides the results of TAP applications, including how many total TAP applications were submitted (July 2017 through November 30, 2020). If one sums the "total submitted application" line, one finds that there have been 64,689 "total submitted applications." If one sums the "approved" lines, one finds that there have been 28,156 approved TAP applications. That indicates an approval rate of 43.5%. Please provide:

    a. A reconciliation of the 64,689 TAP applications submitted through November 30, 2020 and the 47,643 "applications submitted" in the City presentation.
    b. A reconciliation of the 28,156 TAP applications "approved" through November 30, 2020 and the 32,608 "approved applications" in the City presentation.
    c. If the City presentation includes programs other than TAP, please provide a detailed description of how there can be fewer "submitted" applications but "approved" applications in the City presentation.
    d. Provide the date for the City presentation provided in response to Data Request PA-III-22 (which includes PDF page 33).

PA-IX-2. In response to Public Advocate data request III-25, if one sums the number of "approved" TAP applications, there is a total of 28,156 through November 30, 2020. However, if one sums the total number of TAP new enrollees provided in the response to PA-III-11 (PA-III-11B) there is a total of 36,387 new TAP enrollees through November 2020. Please provide

    a. A reconciliation of how the number of new TAP enrollees can exceed the number of "approved" TAP applications; and
    b. A reconciliation of how there can be 36,387 new TAP enrollees (PA-III-11) but only 32,608 "approved applications" (PA-III-22, page 33).
PA-IX-3. Please provide a detailed explanation of how there can be either 28,156 approved TAP applications (PA-III-25), or 36,387 new TAP enrollees (PA-III-11) through November 2020, but only 16,433 total TAP enrollees in December 2020. Provide an explanation of when the new enrollees (or approved applicants) either exited the program or did not enter the program; and why the new TAP enrollees (or approved applications) either exited the program or did not enter the program.

PA-IX-4. Please provide a single copy of all PWD correspondence with TAP participants informing such participants of their need to recertify for the program.

PA-IX-5. Please provide a single copy of all notices informing TAP participants of the need to recertify to maintain TAP participation which notices specifically informed customers of special steps, if any, that were required, to recertify during the COVID-19 pandemic.

PA-IX-6. By month for the months January 2020 to present, please provide:
   a. The number of TAP participants who would be required to recertify to continue participation;
   b. The number of TAP participants who did recertify to continue participation;
   c. The number of TAP participants who failed to recertify but whose TAP participation was not terminated.
   d. The number of TAP participants who failed to recertify and whose TAP participation in TAP was terminated for failure to recertify.

PA-IX-7. Please provide a comprehensive description of all changes to the TAP recertification procedure or process to take into account:
   a. Customer limitations due to COVID-19;
   b. PWD limitations due to COVID-19.

PA-IX-8. Please provide a detailed description of:
   a. Why the number of TAP applications submitted fell from an average of 6,000 or more from March 2019 through February 2020 to:
      i. 2,258 in March 1, 2020 through May 31, 2020;
      ii. 1,675 in June 1, 2020 through August 30, 2020; and
      iii. 1,055 in September 1, 2020 to November 30, 2020.
   b. Why the percentage of TAP applications submitted that were approved fell to:
      i. 27.1% of the applications submitted in March 1, 2020 through May 31, 2020;
      ii. 18.4% of the applications submitted in June 1, 2020 through August 31, 2020; and
      iii. 26.4% of the applications submitted in September 1, 2020 through November 30, 2020.

PA-IX-9. Please provide a detailed description of why the number of TAP applications approved fell to:
   a. 613 in March 1, 2020 through May 31, 2020;
   b. 309 in June 1, 2020 through August 31, 2020; and
c. 279 in September 1, 2020 through November 30, 2020.

PA-IX-10. Please provide a detailed description of why the number of TAP applications found to be "incomplete" is so much higher than the number of TAP applications "approved" in:
   a. March 1, 2020 through May 31, 2020 (1,291 incomplete vs. 613 approved);
   b. June 1, 2020 through August 31, 2020 (429 incomplete vs. 309 approved); and
   c. September 1, 2020 through November 30, 2020 (662 incomplete vs. 279 approved).

PA-IX-11. Please provide a detailed explanation of why the number of TAP participants defaulting from TAP due to the fact that they "did not respond" increased from 244 (as reported in the March 2019 TAP report) to 5,934 (as reported in the 2020 TAP report).

PA-IX-12. Please provide a detailed explanation of why the number of TAP participants who "failed to successfully recertify" increased from:
   a. 19 who had "missing or invalid income or residency documentation" (as reported in the 2019 TAP report) to 1,331 (as reported in the 2020 TAP report); and
   b. 3 who had "missing information on application form" (as reported in the 2019 TAP report) to 149 (as reported in the 2020 TAP report).