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 XI

PA-XI-1. Reference PWD response to PA II-57, for each Philadelphia zip code, provide the number of properties where liens have been filed for TAP participants due to an unpaid water bill.

PA-XI-2. For calendar years 2017 through present, for each Philadelphia zip code, provide the number of TAP denials.

PA-XI-3. Reference PWD Statement 5 (page 12), please identify the number of suspended PWD accounts as of March 1, 2020.

PA-XI-4. For the accounts identified in response to PA XI-3, please provide the following:
   a. The number of accounts PWD has been able to restore;
   b. The number of accounts PWD has been unable to restore due to unsafe plumbing conditions;
   c. The number of accounts PWD has been unable to restore due to reasons other than unsafe plumbing conditions;

PA-XI-5. For each Philadelphia zip code, provide the number of accounts that were restored since March 2020.

PA-XI-6. Please describe all outreach and communication efforts that PWD has provided to accounts that were restored since March 2020.

PA-XI-7. Please describe all TAP outreach that PWD has provided to accounts that were restored since March 2020.

PA-XI-8. Please state the number of TAP applications that have been requested by accounts that were restored since March 2020.
PA-XI-9. Please state the number of TAP applications that have been approved on accounts that were restored since March 2020.

PA-XI-10. Please state the total dollar amount of payments that PWD has received from accounts that were restored since March 2020.

PA-XI-11. Please describe how PWD tracks the language needs of its customers.

PA-XI-12. Please describe how PWD informs subcontractors and external vendors of the language needs of PWD customers.

PA-XI-13. For each calendar year since 2017, please provide the number of TAP applications approved for Limited English Proficiency (LEP) or English as a Second Language (ESL) customers.

PA-XI-14. For each calendar year since 2017, please provide the total number of TAP applications submitted in a language other than English.

PA-XI-15. For each calendar year since 2017, please state the number of TAP accounts that PWD has determined to be high usage accounts.

PA-XI-16. For each calendar year since 2017, please state the number of TAP accounts that PWD has determined to be eligible for services through the Low Income Conservation Assistance Program (LICAP).

PA-XI-17. For each calendar year since 2017, please state the number of TAP accounts that have received measures other than an audit through LICAP.

PA-XI-18. For each calendar year since 2017, please state the number of TAP accounts that were referred to LICAP but were determined to have plumbing needs not covered by the LICAP program.

PA-XI-19. Please provide a copy of all reports prepared since 2017 describing the performance of LICAP and savings generated by LICAP.

PA-XI-20. Please state the total number of HELP loan applications that were approved in 2019.

PA-XI-21. Of the HELP loans that were approved in 2019, how many applicants received an initial estimated loan term that was subsequently increased via a change order.

PA-XI-22. Please state the number of HELP loan applications that were approved in 2020.

PA-XI-23. Of the HELP loans that were approved in 2020, how many applicants received an initial estimated loan term that was subsequently increased via a change order.

PA-XI-24. Please provide the names of all HELP loan subcontractors.

PA-XI-25. Please state the number of active HELP loan agreements.
PA-XI-26. Please state the number of participants enrolled in the Tiered HELP Program set forth in PWD Regulation 200.6.

PA-XI-27. Please state the number of participants enrolled in the Tiered HELP Program who are enrolled in a 60 month payment agreement.

PA-XI-28. Please state the number of participants enrolled in the Tiered HELP Program who are enrolled in a 120 month payment agreement.

PA-XI-29. Please state the number of participants enrolled in the Tiered HELP Program who are enrolled in a 180 month payment agreement.

PA-XI-30. For calendar years 2018-2020, please provide the following:
   a. The number of HELP loans approved for lateral repairs or replacements;
   b. The number of HELP loans approved for slant repairs or replacements;
   c. The number of HELP loans approved for vent cover repairs or replacements;
   d. The number of HELP loans approved for curb trap repairs or replacements;
   e. The number of HELP loans approved for main house drain repairs or replacements;
   f. The number of HELP loans approved for ferrule repairs or replacements;
   g. The number of HELP loans approved for water service pipe repairs or replacements;
   h. The number of HELP loans approved for water supply pipe repairs or replacements;
   i. The number of HELP loans approved for curb stop repairs or replacements;
   j. The number of HELP loans approved for curb stop box repairs or replacements;
   k. The number of HELP loans approved for supply valve repairs or replacements;
   l. The number of HELP loans approved for water meter repairs or replacements;
   m. The number of HELP loans approved for lead service line replacements.

PA-XI-31. Please describe any barriers to PWD providing a downloadable Pdf of the TAP application on its website without requiring an applicant to login or provide an access code to access the application.

PA-XI-32. Please provide a copy of all training manuals used to train PWD and WRB staff on compliance with the provisions of USTRA.
PA-XI-33. Reference PWD response to PA II-8: please confirm or deny whether PWD notifies the Philadelphia Department of Licenses and Inspections prior to the discontinuance of service to a landlord ratepayer for nonpayment, as required by 68 P.S. 399.3(a)(2).

PA-XI-34. Reference PWD response to PA II-8: please confirm or deny whether PWD notifies the Philadelphia Department of Public Health prior to the discontinuance of service to a landlord ratepayer for nonpayment, as required by 68 P.S. 399.3(a)(2).

PA-XI-35. Please provide by month, for July 2019 to present, the number of active TAP participants who reached 24 months of TAP participation in that month. For example, if someone newly enrolled in TAP in September 2017, their 24th month of participation would be August 2019. This question asks for the count of active TAP participants in each month who reached their 24th month of TAP participation in that month.

PA-XI-36. Reference PWD response to PA-VIII-25, which states as follows: "Customer account penalties are tracked separately in the water billing system by a specific code that identifies them as penalties. This code allows the arrearage forgiveness processes to clearly identify penalty and non-penalty debt. The penalty Forgiveness Program was, in fact, implemented earlier than the Principal Forgiveness Program. Penalty forgiveness was implemented in June 2019 and principal forgiveness was implemented starting in September 2020." Please respond to the following:

a. Please confirm whether June 2019 is a typo and whether the Principal Forgiveness Program started on an earlier date.

b. When PWD says "penalty forgiveness was implemented in June 2019," does that mean that June 2019 could be "month 24" for purposes of earning forgiveness, or does that mean that June 2019 was "month 1" for purposes of earning forgiveness?

c. When PWD says "principal forgiveness was implemented starting in September 2020," does that mean that September 2020 could be "month 24" for purposes of earning forgiveness, or does that mean that September 2020 was "month 1" for purposes of earning forgiveness?

PA-XI-37. Reference PWD informal discovery response to CLS dated February 19, 2021. Please provide a copy of the heat maps that were created by PWD to show the concentration of properties eligible for shut-off, as of April 30, 2017. Please provide the underlying data that was used to create the heat maps in electronic format with the formulae intact.