

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-12

Dated: March 2021

1 **PA-IX-1.** IN RESPONSE TO PUBLIC ADVOCATE DATA REQUEST III-22, AT PAGE
2 33, WHICH IS AN UNDATED PRESENTATION BY THE CITY, THERE IS A
3 PAGE TITLED "ASSISTANCE SUCCESSES." THIS PAGE INDICATES
4 THAT THERE HAVE BEEN 47,643 "APPLICATIONS SUBMITTED," WHILE
5 THERE HAVE BEEN 32,608 "APPROVED APPLICATIONS." THE PAGE
6 SAYS "APPLICANTS RECEIVING ASSISTANCE" IS 68%. IN CONTRAST,
7 THE RESPONSE TO PUBLIC ADVOCATE DATA REQUEST III-25
8 PROVIDES THE RESULTS OF TAP APPLICATIONS, INCLUDING HOW
9 MANY TOTAL TAP APPLICATIONS WERE SUBMITTED (JULY 2017
10 THROUGH NOVEMBER 30, 2020). IF ONE SUMS THE "TOTAL
11 SUBMITTED APPLICATION" LINE, ONE FINDS THAT THERE HAVE
12 BEEN 64,689 "TOTAL SUBMITTED APPLICATIONS." IF ONE SUMS THE
13 "APPROVED" LINES, ONE FINDS THAT THERE HAVE BEEN 28,156
14 APPROVED TAP APPLICATIONS. THAT INDICATES AN APPROVAL
15 RATE OF 43.5%. PLEASE PROVIDE:

- 16 A. A RECONCILIATION OF THE 64,689 TAP APPLICATIONS SUBMITTED
17 THROUGH NOVEMBER 30, 2020 AND THE 47,643 "APPLICATIONS
18 SUBMITTED" IN THE CITY PRESENTATION.
- 19 B. A RECONCILIATION OF THE 28,156 TAP APPLICATIONS "APPROVED"
20 THROUGH NOVEMBER 30, 2020 AND THE 32,608 "APPROVED
21 APPLICATIONS" IN THE CITY PRESENTATION.
- 22 C. IF THE CITY PRESENTATION INCLUDES PROGRAMS OTHER THAN TAP,
23 PLEASE PROVIDE A DETAILED DESCRIPTION OF HOW THERE CAN BE
24 FEWER "SUBMITTED" APPLICATIONS BUT "APPROVED"
25 APPLICATIONS IN THE CITY PRESENTATION.
- 26 D. PROVIDE THE DATE FOR THE CITY PRESENTATION PROVIDED IN
27 RESPONSE TO DATA REQUEST PA-III-22 (WHICH INCLUDES PDF PAGE
28 33).

1 **RESPONSE:**

2 The City Presentation provided in response to PA-III-22 was given in September 2019, and
3 reflects data as of the end of August 2019. The number of applications provided in that
4 presentation were approved for any customer assistance program – TAP, senior citizen
5 discount, WRBCC, or an extended payment agreement. The report provided in response to
6 PA-III-25 summarizes applications’ initial status changes within different periods of time.
7 So, in addition to those applications whose initial status change is an approval, some
8 applications are approved after initially having the status of “incomplete.”
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10 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-IX-2.** IN RESPONSE TO PUBLIC ADVOCATE DATA REQUEST III-25, IF ONE
2 SUMS THE NUMBER OF "APPROVED" TAP APPLICATIONS, THERE IS A
3 TOTAL OF 28,156 THROUGH NOVEMBER 30, 2020. HOWEVER, IF ONE
4 SUMS THE TOTAL NUMBER OF TAP NEW ENROLLEES PROVIDED IN
5 THE RESPONSE TO PA-III-11 (PA-III-11B) THERE IS A TOTAL OF 36,387
6 NEW TAP ENROLLEES THROUGH NOVEMBER 2020. PLEASE PROVIDE
7 A. A RECONCILIATION OF HOW THE NUMBER OF NEW TAP ENROLLEES
8 CAN EXCEED THE NUMBER OF "APPROVED" TAP APPLICATIONS; AND
9 B. A RECONCILIATION OF HOW THERE CAN BE 36,387 NEW TAP
10 ENROLLEES (PA-III-11) BUT ONLY 32,608 "APPROVED APPLICATIONS"
11 (PA-III-22, PAGE 33).
12

13 **RESPONSE:**

14 Please see the response to PA-IX-1. The "Application Status Updates Summary -
15 Approvals" section of the report provided in response to PA-III-25 doesn't count all
16 approved applications, it counts applications' initial status changes within the processing
17 workflow within different periods of time. Those initially marked as incomplete or
18 exception can later be approved if additional required information was received from the
19 customer or an internal data review is completed. "New TAP Enrollees," as described in
20 response to PA-II-11, are applicants approved for TAP, whether that approval is the initial
21 status change or approval of a previously incomplete application.
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23 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-IX-3.** PLEASE PROVIDE A DETAILED EXPLANATION OF HOW THERE CAN BE
2 EITHER 28,156 APPROVED TAP APPLICATIONS (PA-III-25), OR 36,387
3 NEW TAP ENROLLEES (PA-III-11) THROUGH NOVEMBER 2020, BUT
4 ONLY 16,433 TOTAL TAP ENROLLEES IN DECEMBER 2020. PROVIDE
5 AN EXPLANATION OF WHEN THE NEW ENROLLEES (OR APPROVED
6 APPLICANTS) EITHER EXITED THE PROGRAM OR DID NOT ENTER THE
7 PROGRAM; AND WHY THE NEW TAP ENROLLEES (OR APPROVED
8 APPLICATIONS) EITHER EXITED THE PROGRAM OR DID NOT ENTER
9 THE PROGRAM.
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11 **RESPONSE:**

12 See the response to PA-IX-2 to better understand that the reports are not all comparable.
13 The 16,433 figure noted in the question is the number of TAP Participants, not “TAP
14 enrollees” as described. See the response to PA-III-11 for a detailed explanation of the
15 “TAP Participants” field in that report. Application approvals and TAP enrollee figures
16 include recertification applications, and a customer that recertifies for TAP would be a
17 “participant” before and after recertification. Customers enrolled in TAP are considered
18 “participants” when they receive a TAP bill in a given month. Once enrolled, customers
19 only exit the program through defaulting from TAP or by no longer being customers of
20 PWD.
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22 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-IX-4.** PLEASE PROVIDE A SINGLE COPY OF ALL PWD CORRESPONDENCE
2 WITH TAP PARTICIPANTS INFORMING SUCH PARTICIPANTS OF THEIR
3 NEED TO RECERTIFY FOR THE PROGRAM.
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5 **RESPONSE:**

6 Please see response attachment PA-IX-4 PWD TAP Recertification Letters.
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8 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne A.
9 Muhammed, Water Revenue Bureau
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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.

RESPONSE:

Please refer to response PA-IX-4. Additionally, the City did not ask any participants to recertify during the COVID-19 pandemic.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne A. Muhammed, Water Revenue Bureau

1 **PA-IX-6.** BY MONTH FOR THE MONTHS JANUARY 2020 TO PRESENT, PLEASE
2 PROVIDE:

- 3 A. THE NUMBER OF TAP PARTICIPANTS WHO WOULD BE REQUIRED TO
4 RECERTIFY TO CONTINUE PARTICIPATION;
- 5 B. THE NUMBER OF TAP PARTICIPANTS WHO DID RECERTIFY TO
6 CONTINUE PARTICIPATION;
- 7 C. THE NUMBER OF TAP PARTICIPANTS WHO FAILED TO RECERTIFY
8 BUT WHOSE TAP PARTICIPATION WAS NOT TERMINATED.
- 9 D. THE NUMBER OF TAP PARTICIPANTS WHO FAILED TO RECERTIFY
10 AND WHOSE TAP PARTICIPATION IN TAP WAS TERMINATED FOR
11 FAILURE TO RECERTIFY.

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13 **RESPONSE:**

14 Between January 2020 and present, WRB requested that 1,944 customers recertify to
15 continue their participation in TAP. A breakdown by month and application outcome is
16 provided below. Beginning in mid-March 2020 and through the present, customers were no
17 longer asked to recertify.

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	Jan-20	Feb-20	Mar-20
TAP participants asked to recertify	955	928	61
Successfully recertified in TAP	371	268	12
Recertified and placed in a more affordable alternative	27	24	0
Did not successfully recertify but remained in TAP	372	578	47
Did not successfully recertify and removed from TAP	185	58	2

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25 Normally, customers that do not successfully recertify in a timely manner are removed from
26 TAP. However, in 2020, for customers who did not respond to the recertification request or
27 who responded but did not complete the recertification application as of July 20, 2020, the
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1 outstanding recertification application was set aside and the customers were not removed
2 from TAP.

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4 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants. Inc.
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1 **PA-IX-7.** PLEASE PROVIDE A COMPREHENSIVE DESCRIPTION OF ALL CHANGES
2 TO THE TAP RECERTIFICATION PROCEDURE OR PROCESS TO TAKE
3 INTO ACCOUNT:

- 4 A. CUSTOMER LIMITATIONS DUE TO COVID-19;
5 B. PWD LIMITATIONS DUE TO COVID-19.
6

7 **RESPONSE:**

8 The City did not ask any participants to recertify during the COVID-19 pandemic.
9

10 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne A.
11 Muhammed, Water Revenue Bureau
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1 **PA-IX-8.** PLEASE PROVIDE A DETAILED DESCRIPTION OF:

2 A. WHY THE NUMBER OF TAP APPLICATIONS SUBMITTED FELL FROM
3 AN AVERAGE OF 6,000 OR MORE FROM MARCH 2019 THROUGH
4 FEBRUARY 2020 TO:

5 I. 2,258 IN MARCH 1, 2020 THROUGH MAY 31, 2020;

6 II. 1,675 IN JUNE 1, 2020 THROUGH AUGUST 30, 2020; AND

7 III. 1,055 IN SEPTEMBER 1, 2020 TO NOVEMBER 30, 2020.

8 B. WHY THE PERCENTAGE OF TAP APPLICATIONS SUBMITTED THAT
9 WERE APPROVED FELL TO:

10 I. 27.1% OF THE APPLICATIONS SUBMITTED IN MARCH 1, 2020
11 THROUGH MAY 31, 2020;

12 II. 18.4% OF THE APPLICATIONS SUBMITTED IN JUNE 1, 2020
13 THROUGH AUGUST 31, 2020; AND

14 III. 26.4% OF THE APPLICATIONS SUBMITTED IN SEPTEMBER 1, 2020
15 THROUGH NOVEMBER 30, 2020.

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17 **RESPONSE:**

18 A. We have no specific information on why applications fell over that time. However,
19 we believe it may have to do with the suspension of recertification requirements and
20 the moratorium on enforcement actions taken in March 2020. Please see pages 5 and 6
21 of *Comments of the Energy Association of Pennsylvania in Response to PUC Order*
22 *Entered on October 13, 2020* from Terrance Fitzpatrick and Donna Clark submitted to
23 the Pennsylvania Public Utility Commission dated February 16, 2021
24 (<https://www.puc.pa.gov/pcdocs/1693507.pdf>) and pages 1 and 2 of *UGI Utilities, Inc.*
25 *– Gas and Electric Divisions’ Comments to the October 13, 2020 Service Termination*
26 *Moratorium Order* submitted to the Pennsylvania Public Utility Commission from
27 Danielle Jouenne dated February 16, 2021
28 (<https://www.puc.pa.gov/pcdocs/1693536.pdf>).

1 B. See the response to PA-IX-2 to understand that the report provided in response to PA-
2 III-25 is counting initial status changes. Applications that are first incomplete or
3 marked as an exception can later be approved.
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5 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau, RaVonne A.
6 Muhammed, Water Revenue Bureau, and Raftelis Financial Consultants. Inc.
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1 **PA-IX-9.** PLEASE PROVIDE A DETAILED DESCRIPTION OF WHY THE NUMBER
2 OF TAP APPLICATIONS APPROVED FELL TO:

3 A. 613 IN MARCH 1, 2020 THROUGH MAY 31, 2020;

4 B. 309 IN JUNE 1, 2020 THROUGH AUGUST 31, 2020; AND

5 C. 279 IN SEPTEMBER 1, 2020 THROUGH NOVEMBER 30, 2020.
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7 **RESPONSE:**

8 See the response to PA-IX-8 for information on both the number of applications submitted
9 and the proportion of applications whose initial status change was an approval, as shown in
10 the report provided as PA-III-25.
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12 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-IX-10.** PLEASE PROVIDE A DETAILED DESCRIPTION OF WHY THE NUMBER
2 OF TAP APPLICATIONS FOUND TO BE "INCOMPLETE" IS SO MUCH
3 HIGHER THAN THE NUMBER OF TAP APPLICATIONS "APPROVED" IN:
4 A. MARCH 1, 2020 THROUGH MAY 31, 2020 (1,291 INCOMPLETE VS. 613
5 APPROVED);
6 B. JUNE 1, 2020 THROUGH AUGUST 31, 2020 (429 INCOMPLETE VS. 309
7 APPROVED); AND
8 C. SEPTEMBER 1, 2020 THROUGH NOVEMBER 30, 2020 (662 INCOMPLETE
9 VS. 279 APPROVED).
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11 **RESPONSE:**

12 WRB does not have insight into why a greater proportion of customers are submitting
13 incomplete applications. However, neither the definition of an incomplete application nor
14 the process for determining an application incomplete has changed. Please see pages 5 and
15 6 of *Comments of the Energy Association of Pennsylvania in Response to PUC Order*
16 *Entered on October 13, 2020* from Terrance Fitzpatrick and Donna Clark submitted to the
17 Pennsylvania Public Utility Commission dated February 16, 2021
18 (<https://www.puc.pa.gov/pcdocs/1693507.pdf>) and pages 1 and 2 of *UGI Utilities, Inc. –*
19 *Gas and Electric Divisions' Comments to the October 13, 2020 Service Termination*
20 *Moratorium Order* submitted to the Pennsylvania Public Utility Commission from
21 Danielle Jouenne dated February 16, 2021 (<https://www.puc.pa.gov/pcdocs/1693536.pdf>).
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23 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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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).

RESPONSE:

This information is included in the CY2019 report (called "2020 TAP Report" in the question), just below the table containing the information in question.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-IX-12.** PLEASE PROVIDE A DETAILED EXPLANATION OF WHY THE NUMBER
2 OF TAP PARTICIPANTS WHO "FAILED TO SUCCESSFULLY RECERTIFY"
3 INCREASED FROM:

4 A. 19 WHO HAD "MISSING OR INVALID INCOME OR RESIDENCY
5 DOCUMENTATION" (AS REPORTED IN THE 2019 TAP REPORT) TO 1,331
6 (AS REPORTED IN THE 2020 TAP REPORT); AND

7 B. 3 WHO HAD "MISSING INFORMATION ON APPLICATION FORM" (AS
8 REPORTED IN THE 2019 TAP REPORT) TO 149 (AS REPORTED IN THE
9 2020 TAP REPORT).

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11 **RESPONSE:**

12 See the response to PA-IX-11. The report already addresses the overall increase in
13 customers who failed to recertify (which results in increases to all subcategories).

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