

**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**

Motion for Continuance

1. Lance Haver is an intervenor in the current rate case.
2. According to the testimony provided by the Philadelphia Water Department, one of the major reasons for the proposed rate increase has been the decrease in revenues.
3. One of the major reasons for the decrease in revenues has been the increase in uncollectables.
4. One of the major reasons for the increase in uncollectables has been and will continue to be the City, State and Federal Government's response to pandemic of COVID 19.
5. Those responses include (d) the shutting down of many different businesses, the limiting of activities that effect employment and work hours and closure of venues which house activities that provide employment for thousands.
6. The Federal Government has passed into law the American Rescue Plan Act (ARP) which sets aside hundreds of millions of dollars to cover the utility bills of unemployed Americans and to support needed infrastructure improvements. The leading industry group for publicly owned water utilities, The National Association of Clean Water Agencies (NACWA) states "This week, President Biden signed into law the American Rescue Plan Act, legislation to deliver additional COVID-19 relief that contains \$500M in assistance for low-income clean water customers and support for critical water and sewer investments. This water assistance funding comes in addition to the initial \$638M provided in the December 2020 *FY21 Consolidated Appropriations Act* for a total of \$1.138 B. Additionally, the relief package makes clean water infrastructure needs explicitly eligible to access \$350B through the Coronavirus State and Local Fiscal Recovery Funds, which are intended to address COVID-19 expenses, lost state and local revenues as a result of the COVID-19 pandemic, and necessary investments in water, sewer, and broadband."
7. When the Philadelphia Water Department filed the requested rate hike, the American Recovery Plan Act had not passed and COVID recovery funds had not been set aside to help defray the revenue losses and costs of rebuilding infrastructure that have been now allocated.
8. As of today, March 15th, it is unclear exactly how much money PWD will get and how that money will be allocated.
9. Until the amounts PWD will be receiving are known and how the funds are to be used, in which proportions it is premature for the PWD to seek increased revenues.
10. Intervenor Haver therefore moves for a postponement of the Water Rate Increase Proceedings until such time as it is known how much of the money set aside under the American Rescue Act will be allocated to the Philadelphia Water Department and how those funds can be used.

11. I Lance Haver, do hereby certify that I have sent a copy of this motion to all listed parties.

Lance Haver, Pro Se