RESPONSE TO
PUBLIC ADVOCATE’S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-37

Dated: March 2021
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.

RESPONSE:

Please see response attachment PA-XI-1 Liens Against TAP Participants.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and RaVonne A. Muhammed, Water Revenue Bureau
PA-XI-2. FOR CALENDAR YEARS 2017 THROUGH PRESENT, FOR EACH
PHILADELPHIA ZIP CODE, PROVIDE THE NUMBER OF TAP DENIALS.

RESPONSE:
The table below summarizes the number of customer assistance applications that were
denied in each calendar year for ineligibility or incompleteness. Note that these are counts
of applications, not customers or accounts. Applications that were approved for any
assistance program or were found to have no assistance program be the most affordable
alternative are not included.

<table>
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RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

RESPONSE:

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

RESPONSE PROVIDED BY: Philadelphia Water Department and Raftelis Financial Consultants, Inc.
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;

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

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-XI-5. FOR EACH PHILADELPHIA ZIP CODE, PROVIDE THE NUMBER OF ACCOUNTS THAT WERE RESTORED SINCE MARCH 2020.

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-XI-6. PLEASE DESCRIBE ALL OUTREACH AND COMMUNICATION EFFORTS THAT PWD HAS PROVIDED TO ACCOUNTS THAT WERE RESTORED SINCE MARCH 2020.

RESPONSE:

Please refer to attachment PA-VIII-5 Outreach During Moratorium as well as PA-XI-6 Door Hanger. These were placed on every property that was restored.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-XI-7. PLEASE DESCRIBE ALL TAP OUTREACH THAT PWD HAS PROVIDED TO ACCOUNTS THAT WERE RESTORED SINCE MARCH 2020.

RESPONSE:

Please refer to attachment PA-VIII-5 TAP Outreach During Moratorium.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-XI-8. PLEASE STATE THE NUMBER OF TAP APPLICATIONS THAT HAVE BEEN REQUESTED BY ACCOUNTS THAT WERE RESTORED SINCE MARCH 2020.

RESPONSE:

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

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

RESPONSE:

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

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-XI-10. PLEASE STATE THE TOTAL DOLLAR AMOUNT OF PAYMENTS THAT
PWD HAS RECEIVED FROM ACCOUNTS THAT WERE RESTORED SINCE
MARCH 2020.

RESPONSE:

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

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
PA-XI-11. PLEASE DESCRIBE HOW PWD TRACKS THE LANGUAGE NEEDS OF ITS CUSTOMERS.

RESPONSE:

PWD uses current available census data and produces a web-based map to display predominant language spoken for each census tract. A related series of maps show the three highest languages spoken after English, based on the number of residents speaking that language in each census tract. The map can be viewed at the following link: https://phl-water.maps.arcgis.com/apps/CompareAnalysis/index.html?appid=55a32a29024c43089174c2c5c15f9311

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-XI-12. PLEASE DESCRIBE HOW PWD INFORMS SUBCONTRACTORS AND EXTERNAL VENDORS OF THE LANGUAGE NEEDS OF PWD CUSTOMERS.

RESPONSE:

PWD works on a case-by-case basis with contractors or subcontractors to understand what communications will be necessary for their work and what language needs should be anticipated based on the area of the city they will be working in.

RESPONSE PROVIDED BY: Philadelphia Water Department
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.

RESPONSE:

The following table shows the number of non-English customer assistance applications that were approved for TAP in each calendar year:

<table>
<thead>
<tr>
<th>Year</th>
<th>Applications Approved for TAP</th>
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<tr>
<td>2017</td>
<td>24</td>
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<tr>
<td>2018</td>
<td>148</td>
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<tr>
<td>2019</td>
<td>153</td>
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<td>2020</td>
<td>70</td>
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RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
PA-XI-14. FOR EACH CALENDAR YEAR SINCE 2017, PLEASE PROVIDE THE TOTAL NUMBER OF TAP APPLICATIONS SUBMITTED IN A LANGUAGE OTHER THAN ENGLISH.

RESPONSE:

The following table shows the number of non-English customer assistance applications that were submitted in each calendar year:

<table>
<thead>
<tr>
<th>Year</th>
<th>Applications Submitted</th>
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</thead>
<tbody>
<tr>
<td>2017</td>
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<td>2018</td>
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<tr>
<td>2019</td>
<td>281</td>
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<tr>
<td>2020</td>
<td>126</td>
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</table>

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
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.

RESPONSE:

The City/PWD/WRB does not categorize accounts as “high usage.” Rather, each month, up to 4,000 TAP participant accounts with the highest usage (average of three months, and only actual usage, not estimates) are provided to the LICAP program administrator. Accounts are only included in the monthly list if they have not been provided previously.

<table>
<thead>
<tr>
<th>Year</th>
<th>Count of Accounts</th>
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</thead>
<tbody>
<tr>
<td>2017</td>
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<tr>
<td>2019</td>
<td>10,501</td>
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<tr>
<td>2020</td>
<td>2,199</td>
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RESPONSE PROVIDED BY: Philadelphia Water Department and Raftelis Financial Consultants, Inc.
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).

RESPONSE:

Customers enrolled in TAP are eligible for LICAP. The program administrator, CMC Energy Services, contacts customers to request their participation on accounts provided as described in the response to PA-XI-15 above.

RESPONSE PROVIDED BY: Philadelphia Water Department and Raftelis Financial Consultants, Inc.
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.

RESPONSE:

There is no report responsive to this request. Conservation measures are offered to every customer who completes an audit. Although rare, customers can refuse any direct install measures or follow up work. In these cases, customers are provided an educational leave behind and referrals to other assistance programs for which they may qualify.

RESPONSE PROVIDED BY: Philadelphia Water Department
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.

RESPONSE:

There is no report responsive to this request. Customers with plumbing needs that are
beyond the scope of the LICAP program are provided with referral information to other
state and utility funded assistance programs.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-XI-19. PLEASE PROVIDE A COPY OF ALL REPORTS PREPARED SINCE 2017
DESCRIBING THE PERFORMANCE OF LICAP AND SAVINGS
GENERATED BY LICAP.

RESPONSE:

Please see response attachment PA-XI-19.pdf.

RESPONSE PROVIDED BY: Philadelphia Water Department

RESPONSE:

In FY 2019 Plumbing Repairs completed 529 water service repairs; 782 sewer related repairs; and replaced 56 lead water services. For a total of 1367 repairs and approved HELP applicants.

RESPONSE PROVIDED BY: Philadelphia Water Department
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.

RESPONSE:

As reflected in response attachment PA-XI-30, the total amount of HELP loans in FY 2019 that were subsequently increased via a change order was 310.

RESPONSE PROVIDED BY: Philadelphia Water Department

RESPONSE:

In FY 2020 Plumbing Repairs completed 395 water service repairs; 533 sewer related repairs; and replaced 31 lead water services. For a total of 959 repairs and approved HELP applicants.

RESPONSE PROVIDED BY: Philadelphia Water Department
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.

RESPONSE:

As reflected in response attachment PA-XI-30, the total amount of HELP loans in FY 2020 that were subsequently increased via a change order was 181.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-XI-24. PLEASE PROVIDE THE NAMES OF ALL HELP LOAN SUBCONTRACTORS.

RESPONSE:

Bart Emanuel Plumbing; Best Choice Plumbing; Burke Plumbing; Buzz Duzz Plumbing; John Ciervo Plumbing; Clements Brothers Plumbing; Coffelt Plumbing; Daniels Inc; DMC Environmental; Edward Hughes & Son Plumbing; Jack Edmondson Plumbing; Excel Plumbing; Guaranteed Plumbing; In-A-Flash Plumbing; Rich Lepore Plumbing; Mr.D’s Plumbing; Reliable Plumbing.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-XI-25. PLEASE STATE THE NUMBER OF ACTIVE HELP LOAN AGREEMENTS.

RESPONSE:

There are 5,388 active HELP loans as of February 28, 2021.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Philadelphia Water Department

RESPONSE:

There are 1,165 participants enrolled in the tiered HELP program as of February 28, 2021.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Philadelphia Water Department
PA-XI-27. PLEASE STATE THE NUMBER OF PARTICIPANTS ENROLLED IN THE TIERED HELP PROGRAM WHO ARE ENROLLED IN A 60 MONTH PAYMENT AGREEMENT.

RESPONSE:

There are 950 participants enrolled in the tiered HELP program who are enrolled in a sixty (60) month payment agreement as of February 28, 2021.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Philadelphia Water Department
PA-XI-28. PLEASE STATE THE NUMBER OF PARTICIPANTS ENROLLED IN THE
TIERED HELP PROGRAM WHO ARE ENROLLED IN A 120 MONTH
PAYMENT AGREEMENT.

RESPONSE:

There are 20 participants enrolled in the tiered HELP program who are enrolled in a one-
hundred and twenty (120) month payment agreement as of February 28, 2021.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau and Philadelphia Water
Department
**PA-XI-29.** PLEASE STATE THE NUMBER OF PARTICIPANTS ENROLLED IN THE TIERED HELP PROGRAM WHO ARE ENROLLED IN A 180 MONTH PAYMENT AGREEMENT.

**RESPONSE:**

There are 195 participants enrolled in the tiered HELP program who are enrolled in a one-hundred and eighty (180) month payment agreement as of February 28, 2021.

**RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia Water Department
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.
RESPONSE:

Please see response attachment PA-XI-30.xlsx.

RESPONSE PROVIDED BY: Philadelphia Water Department
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.

RESPONSE:

An access code is used to generate a bar code specifically reflecting the customer of
record at the property. Importantly, the process is designed so that shut-off protections are
automatically provided to the customer during the customer’s application process. The
ordinance that created TAP requires robust reporting. WRB’s reporting mechanisms all
depend upon the bar code information. A downloadable PDF application without a unique
bar code could not ensure proper reporting, nor could customers that used it be provided
with automated shut-off protection. Customers are able to download a sample application
from PWD’s website if they would like to view the application or instructions and to
prepare application materials.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
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.

RESPONSE:

Please refer to response attachment PA-II-18 USTRA Training Documents.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
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).

RESPONSE:
PWD is not aware of these communications having happened, however a process is now in place to comply with all aspects of 68 P.S. 399.3(A)(2).

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau
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).

RESPONSE:

PWD is not aware of these communications having happened, however a process is now in place to comply with all aspects of 68 P.S. 399.3(A)(2).

RESPONSE PROVIDED BY:  Susan M. Crosby, Water Revenue Bureau
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.

RESPONSE:

The following table shows the number of TAP participants who received their 24th TAP
bill in a given month. These results do not require that that 24 months be consecutive.

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<th>ACCOUNTS</th>
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RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.
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?
RESPONSE:

A. The Penalty Forgiveness program went live with TAP in July 2017. The first month a participant would have been eligible, assuming all payments were made timely, was June 2019. The Principal Forgiveness Program began in September 2020.

B. June 2019 is month twenty-four (24) for purposes of earning penalty forgiveness.

C. September 2020 is month one (1) for purposes of principal forgiveness.

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

RESPONSE:

RESPONSE PROVIDED BY: Philadelphia Water Department