

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 Charges	Fiscal Years 2022-2023
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**PHILADELPHIA WATER DEPARTMENT'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
SET I (Colton)**

Pursuant to the Hearing Officer's Procedural Rules for this Rate Proceeding, the Philadelphia Water Department ("Department" or "PWD") requests that the Public Advocate provide full and complete answers to the following interrogatories and request for production of documents upon the undersigned with seven calendar days of the service hereof.

Instructions and Definitions

1. Each interrogatory and request for production shall be answered fully and completely by those officers, employees or agents of the Public Advocate who may be cognizant of the requested information and who are authorized to answer on behalf of Public Advocate. All information is to be divulged that is within the knowledge, possession and control or custody of the Public Advocate or its consultants.

2. Each answer shall restate the question and identify the name and affiliation of the person or persons who prepared the answer or who is responsible for the information contained therein.

3. Please attach written or electronic material and documents to any answer for which written or electronic material and documents are requested and/or available. If such written or electronic materials and documents are not available, state where it may be obtained. Label the

material and documents with the number of the interrogatory to which it pertains. Copies of all answers shall be provided in PDF and/or Excel (.xlsx or .xls) format via email. Excel spreadsheets shall be provided with data and formulae intact.

4. Answers to these interrogatories and requests for production of documents shall be made in accordance with the Hearing Officer's Procedural Rules applicable to this rate proceeding.

5. These interrogatories and requests for documents are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete. PWD reserves the right to propound additional interrogatories and to request additional documents as and if additional information is required.

6. For purposes of the following requests, "Public Advocate" or "PA" means and includes Community Legal Services, Inc. and any person, agency or corporation whom either of them has engaged for purposes of this proceeding.

Interrogatories and Requests for Production

1. Reference PA Statement 3, pages 80 to 86 regarding "Race and TAP Denials": Please identify all of the facts, data and documents on which Mr. Colton relies or intends to rely upon to support his analysis on racial impacts.
2. Reference PA Statement 3, Appendix B: Please identify all of the facts, data and documents on which Mr. Colton relies or intends to rely upon to support his analysis in the white paper attached as Appendix B.

3. Reference PA Statement 3, Part 4 (pages 80-86). Provide the Zip Code Tabulation Areas mapped to the Zip Codes that were used in this section's analysis.
4. Reference PA Statement 3, Part 4 (pages 80-86). Provide the entire data set, with formulas intact, used for the rank-ordering of each Zip Code from the lowest number of TAP denials to the highest number of TAP denials.
5. With respect to your response to Question 4 above, provide an explanation of how this data set maps to Table 12, Table 13, the table on page 85, and Schedule RDC-1.
6. Reference PA Statement 3, Part 4 (pages 80-86). Provide the entire data set, with formulas intact, used for the rank-ordering of each Zip Code by percentage of population in each Zip Code that is reported to be comprised of Black persons by the Census Bureau.
7. With respect to your response to Question 6 above, provide an explanation of how this data set maps to Table 12, Table 13, the table on page 85, and Schedule RDC-1.
8. Reference PA Statement 3, Part 4 (pages 80-86). Provide a link to the **specific** data used from the Census Bureau that was utilized for the rank-ordering of each Zip Code by percentage of population in each Zip Code that is reported to be comprised of Black persons by the Census Bureau.
9. Reference PA Statement 3, Part 2 (pages 32-34). Please provide the supporting data and calculation for the statement that there have been “36,564 low-income PWD customers newly enrolled in TAP” between July 2017 and December 2020.

10. Reference PA Statement 3, Part 2 (pages 32-34). Please provide the supporting data and calculations for the statement that TAP participants have \$109,603,111 in pre-program arrears.
11. Reference PA Statement 3, Part 2 (pages 32-34). Please define “non-TAP low-income customers” and “low-income TAP non-participants.”
12. Reference PA Statement 3, Part 2 (pages 32-34). Please provide the supporting data and calculations for the statements regarding the proportions of billed for TAP, non-TAP low-income, and low-income TAP non-participants.

Respectfully submitted,

/s/ Andre C. Dasent

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