

**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 XVI

- PA-XVI-1. Reference PWD Rebuttal St. 3, at page 3: Please describe and provide all relevant documentation related to the PWD and UESF plan for distributing \$1.2 million in relief to TAP and Senior Citizen Discount customers.
- PA-XVI-2. Reference PWD Rebuttal St. 3, at page 3: Please describe and provide all relevant documentation related to PWD's work with PHDC to administer grants of up to \$2,000 for qualifying tenant and landlord customers.
- PA-XVI-3. Reference PWD Rebuttal St. 3, at page 23: Please provide a copy of the WRB internal policy that sets forth what WRB may require from a customer who seeks to establish a tenant account.
- PA-XVI-4. Reference PWD Rebuttal St. 3, at page 42: Please provide all available data to support the assertion that "during the pandemic, the City has used telephone translation services even more often to limit physical interaction."
- PA-XVI-5. Reference: PWD Rebuttal St. 3, at page 5: Please provide as of the most recent date available, a distribution of the number of residential accounts by the level of arrearages in ranges of \$100. The first range would be \$1 - \$100.
- PA-XVI-6. Reference: PWD Rebuttal St. 3, at page 5; Please provide all restrictions that apply to UESF grants, including maximum grant size, and any other limitation on who may receive a grant or what the level of a grant might be.
- PA-XVI-7. Reference: PWD Rebuttal St. 3, at page 5, line 14: Please provide a date for what is meant by "the near future."
- PA-XVI-8. Reference: PWD Rebuttal St. 3, at page 5: Please provide:

- a. The number of COVID-19 vaccinations that have been provided by zip code within Philadelphia (if zip code data is not available, provide data as is available);
- b. The rate of confirmed COVID-19 illnesses for the past eight weeks by zip code (if zip code data is not available, provide data as is available. If eight weeks is not available, please provide what daily or weekly information is available for the most recent time period available).

PA-XVI-9. Reference: PWD Rebuttal St. 3, at page 5: For each year 2018, 2019, and 2020, of the number of customers who were defaulted from TAP, please provide the percentage of TAP customers who were defaulted from TAP for having been found to be no longer income-eligible at the time of recertification.

PA-XVI-10. Reference: PWD Rebuttal St. 3, at page 5:

- a. Please provide a detailed explanation of the purpose of having a TAP participant confirm their residency given their active customer status and their active TAP participation status.
- b. Separately provide a detailed description of all ways in which an active TAP participant may no longer be a resident at the address where they are taking PWD service.

PA-XVI-11. Reference: PWD Rebuttal St. 3, at page 5: With respect to the statement at Line 24 that “there is ample opportunities for customers to submit an application,” please provide a detailed explanation of why there were 365 new TAP enrollees in October/November/December 2020 as compared to 2,974 new TAP enrollees in October/November/December 2019.

PA-XVI-12. Reference: PWD Rebuttal St. 3, at page-6: If “WRB has remained able to accept and process applications in a timely manner, even during the pandemic,” please explain all reasons the data from PWD’s response to PA-III-11 show the following declines:

- a. More specifically, please explain why the number of total applications submitted declined from roughly 6,000 or more in the period March 2019 through November 2019 to only 2,258 to 1,055 in the period March 2020 through November 2020.
- b. More specifically, please explain why the total number of submitted applications declined from 2,258 in March 1, 2020 through May 2020 to only 1,055 in September 2020 through November 2020.
- c. More specifically, please explain why the percentage of TAP applications approved within 30 days declined:

- i. from 52% to 18% in the period March 2019 through May 2019 to the period March 2020 through May 2020;
- ii. from 42% to 18% in the period June 2019 through August 2019 to the period June 2020 through August 2020; and
- iii. from 36% to 26% in the period September 2019 through November 2019 to the period September 2020 through November 2020.

PA-XVI-13. Reference: PWD Rebuttal St. 3, at page 10: Are the revenues billed through the TAP Rider included in PWD's collectability studies? If the answer is anything other than an unqualified "yes," please provide a detailed explanation of whether, if anywhere, the collectability of revenues billed through the TAP Rider is determined.

PA-XVI-14. Reference: PWD Rebuttal St. 3, at page 16: Please provide by page number and line number, a citation to Mr. Colton's testimony where he asserts that PWD is a "Company" or an "IOU."

PA-XVI-15. Reference: PWD Rebuttal St. 3, at page 22; Please provide by page number and line number, including a direct quote from Mr. Colton's testimony in the 2018 general rate proceeding, where Mr. Colton's stated position was:

- a. Customers should receive no arrearage forgiveness unless and until they make 24 complete payments;
- b. PWD should be allowed to collect the costs of arrearage forgiveness through a Rider such as that which is proposed by PWD in this proceeding.

PA-XVI-16. Reference: PWD Rebuttal St. 3, at page 43: Please provide by Regulation Section number, including a direct quote from the regulation, where the disconnection amount for recipients of the Senior Citizen Discount has been reduced because they pay a reduced bill.

PA-XVI-17. Reference: PWD Rebuttal St. 3, at page 43: Please provide by Regulation Section number, including a direct quote from the regulation, where the disconnection amount for WRAP participants, prior to the implementation of TAP, was reduced because they pay a reduced bill.

PA-XVI-18. Reference: PWD Rebuttal St. 3, at page 42: Please identify by line number and a direct quote:

- a. Each place where the documents attached to Mr. Colton's Testimony as "Appendix C" comply with the following statement in PWD's Language Access Plan: "Department notices and flyers will also provide notice of the availability of

language services and a simple instruction on how to request language assistance.” (PWD Language Access Plan, at 12).

- b. Each place where the WRB Tenant Application available at <https://www.phila.gov/media/20200827105627/Tenant-Application-editable-V.4.pdf>, complies with the following statement in PWD’s Language Access Plan: “Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.” (PWD Language Access Plan, at 12).
- c. Each place where the “Water Lien Letter” provided in response to PA-II-20 (page 2) complies with the following statement in PWD’s Language Access Plan: “Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.” (PWD Language Access Plan, at 12).
- d. Each place where the tenant USTRA Bill provided in response to PA-II-16 complies with the following statement in PWD’s Language Access Plan: “Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.” (PWD Language Access Plan, at 12).
- e. Each place where the tenant water shutoff notice provided in response to PA-II-20 (page 25) complies with the following statement in PWD’s Language Access Plan: “Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.” (PWD Language Access Plan, at 12).
- f. Each place where the tenant refund petition provided in response to PA-II-17 complies with the following statement in PWD’s Language Access Plan: “Department notices and flyers will also provide notice of the availability of language services and a simple instruction on how to request language assistance.” (PWD Language Access Plan, at 12).

PA-XVI-19. Reference: PWD Rebuttal St. 3, at page 5: Please provide:

- a. An update to PWD’s response to PA-III-25 through the most recent week available.
- b. An update to PWD’s response to PA-III-11(b) through the most recent month available.

PA-XVI-20. Reference: PWD Rebuttal St. 3, at page 46: Please provide by month, for July 2017 to date:

- a. The number of accounts with pre-program principal arrearage that exceeds 15 years in age;
- b. The dollar of pre-program principal arrearages that exceeds 15 years in age;

- c. The number of accounts who defaulted from TAP at the time of recertification for being over-income;
- d. The dollar amount of pre-program principal arrearages that were owed by customers who defaulted from TAP at the time of recertification for being over-income;
- e. The number of TAP participants who pre-paid their entire pre-program arrears prior to the forgiveness of those arrears;
- f. The number of TAP participants who pre-paid their entire pre-program arrears after being required to do so in order to sell or refinance their home.

PA-XVI-21. Reference PWD St. 8. Please identify and supply copies of any testimony the witnesses have provided to state or local utility rate-making bodies regarding the community economic benefits associated with upgrading and/or improving utility infrastructure.

PA-XVI-22. Reference PWD St. 8. Please identify and supply copies of any rate determinations by state or local utility rate-making bodies that have found community economic benefits associated with upgrading and/or improving utility infrastructure to be relevant to the utility's request for rate relief.

PA-XVI-23. Reference PWD St. 8 at 3. Do the witnesses submit that the Board's role in setting the Water Department's rates and charges is intended to provide "important economic stimulus in Philadelphia and the region"? If so, please provide a detailed explanation of the basis for such belief, together with any supporting authorities relied upon.