

**BEFORE THE PHILADELPHIA WATER, SEWER AND STORM WATER
RATE BOARD**

In the Matter of a Proposed Rate Increase in :
Water, Sewer and Storm Water Rates : **FY 2022-2023 Rates**

Public Advocate's Interrogatories & Requests for Production of Documents

SET XV

- PA-XV-1. Beginning on page 15, line 19, of the rebuttal testimony of Melissa La Buda et al., they state Mr. Morgan does not recognize that the Department's actual collections experience in April to June 2020 was negatively impacted by the COVID pandemic. Please provide the data supporting the Department's actual collections experience from April 2020 through March 2021.
- PA-XV-2. Beginning on page 16, line 9, the witnesses state the Department's current year collections were more than 10% less than historical average in May and June (2020). Please provide the comparable data showing April 2020 through March 2021.
- PA-XV-3. On page 16 line 23, the witnesses state, "the amount of money allotted to low-income customers is limited and reflects only a portion of the Department's delinquent accounts." Please provide the data supporting this statement.