

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-3

Dated: April 2021

1 **PA-XV-1.** BEGINNING ON PAGE 15, LINE 19, OF THE REBUTTAL TESTIMONY OF
2 MELISSA LA BUDA ET AL., THEY STATE MR. MORGAN DOES NOT
3 RECOGNIZE THAT THE DEPARTMENT'S ACTUAL COLLECTIONS
4 EXPERIENCE IN APRIL TO JUNE 2020 WAS NEGATIVELY IMPACTED BY
5 THE COVID PANDEMIC. PLEASE PROVIDE THE DATA SUPPORTING
6 THE DEPARTMENT'S ACTUAL COLLECTIONS EXPERIENCE FROM
7 APRIL 2020 THROUGH MARCH 2021.

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9 **RESPONSE:**

10 Preparation of this response is in progress and will be provided in the future.
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12 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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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.

RESPONSE:

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

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-XV-3.** ON PAGE 16 LINE 23, THE WITNESSES STATE, “THE AMOUNT OF
2 MONEY ALLOTTED TO LOW-INCOME CUSTOMERS IS LIMITED AND
3 REFLECTS ONLY A PORTION OF THE DEPARTMENT’S DELINQUENT
4 ACCOUNTS.” PLEASE PROVIDE THE DATA SUPPORTING THIS
5 STATEMENT.
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7 **RESPONSE:**

8 PHDC’s Philadelphia Rental Assistance Program (Phase 4) offers utility assistance to
9 tenants and landlords who have been impacted by COVID-19. PHDC estimates that
10 between 10,000-15,000 renters will receive assistance; this represents only a portion of
11 PWD’s delinquent accounts. For more information please refer to [https://rent-](https://rent-assist.phila.gov/#/about)
12 [assist.phila.gov/#/about](https://rent-assist.phila.gov/#/about).
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14 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
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