

**SUPPLEMENTAL RESPONSE TO  
PUBLIC ADVOCATE'S INTERROGATORIES  
AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
QUESTIONS 1, 4, 5, & 20**

**Dated: April 2021**

1 **PA-XVI-1.** REFERENCE PWD REBUTTAL ST. 3, AT PAGE 3: PLEASE DESCRIBE AND  
2 PROVIDE ALL RELEVANT DOCUMENTATION RELATED TO THE PWD  
3 AND UESF PLAN FOR DISTRIBUTING \$1.2 MILLION IN RELIEF TO TAP  
4 AND SENIOR CITIZEN DISCOUNT CUSTOMERS.

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6 **RESPONSE:**

7 There are no reports or documents responsive to this request.

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9 **RESPONSE PROVIDED BY:** Philadelphia Water Department

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1 **PA-XVI-4.** REFERENCE PWD REBUTTAL ST. 3, AT PAGE 42: PLEASE PROVIDE ALL  
2 AVAILABLE DATA TO SUPPORT THE ASSERTION THAT “DURING THE  
3 PANDEMIC, THE CITY HAS USED TELEPHONE TRANSLATION  
4 SERVICES EVEN MORE OFTEN TO LIMIT PHYSICAL INTERACTION.  
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6 **RESPONSE:**

7 This assertion is based on anecdotal evidence from the professional staff working in the  
8 Concourse during the Pandemic.  
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10 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
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1 **PA-XVI-5.** REFERENCE: PWD REBUTTAL ST. 3, AT PAGE 5: PLEASE PROVIDE AS  
2 OF THE MOST RECENT DATE AVAILABLE, A DISTRIBUTION OF THE  
3 NUMBER OF RESIDENTIAL ACCOUNTS BY THE LEVEL OF  
4 ARREARAGES IN RANGES OF \$100. THE FIRST RANGE WOULD BE \$1 -  
5 \$100.

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7 **RESPONSE:**

8 Please see attachment PA-XVI-5 for a distribution of the number of residential accounts by  
9 the level of arrearages. Residential accounts are defined as general service residential  
10 (including TAP) and senior citizen discount water accounts which were billed for service in  
11 the preceding month. A count of households in arrears was determined by subtracting the  
12 amount of the most recent month's bill from each account's overall balance. This represents  
13 debt that is past due. The accounts counted may have debt in payment agreements,  
14 bankruptcy, or other protected statuses. An account with any positive balance, is counted in  
15 these figures.

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17 Arrearages are in ranges of \$100 up to \$10,000, with the first range being >\$0 to <=\$100.  
18 Above \$10,000 arrearages are in ranges of \$10,000 up to \$50,000. The final range is  
19 arrearages above \$50,000.

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21 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-XVI-20.** REFERENCE: PWD REBUTTAL ST. 3, AT PAGE 46: PLEASE PROVIDE BY  
2 MONTH, FOR JULY 2017 TO DATE:

3 A. THE NUMBER OF ACCOUNTS WITH PRE-PROGRAM PRINCIPAL  
4 ARREARAGE THAT EXCEEDS 15 YEARS IN AGE;

5 B. THE DOLLAR OF PRE-PROGRAM PRINCIPAL ARREARAGES THAT  
6 EXCEEDS 15 YEARS IN AGE;

7 C. THE NUMBER OF ACCOUNTS WHO DEFAULTED FROM TAP AT THE  
8 TIME OF RECERTIFICATION FOR BEING OVER-INCOME;

9 D. THE DOLLAR AMOUNT OF PRE-PROGRAM PRINCIPAL  
10 ARREARAGES THAT WERE OWED BY CUSTOMERS WHO  
11 DEFAULTED FROM TAP AT THE TIME OF RECERTIFICATION FOR  
12 BEING OVER-INCOME;

13 E. THE NUMBER OF TAP PARTICIPANTS WHO PRE-PAID THEIR ENTIRE  
14 PRE-PROGRAM ARREARS PRIOR TO THE FORGIVENESS OF THOSE  
15 ARREARS;

16 F. THE NUMBER OF TAP PARTICIPANTS WHO PRE-PAID THEIR ENTIRE  
17 PRE-PROGRAM ARREARS AFTER BEING REQUIRED TO DO SO IN  
18 ORDER TO SELL OR REFINANCE THEIR HOME.

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20 **RESPONSE:**

21 Please see attachment PA-XVI-20 for the following information.

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23 A. The number of accounts with pre-program principal arrearage that exceeds 15 years in  
24 age at the time of approval. Once per year, a process is run in basis2 to write off debt  
25 older than 15 years. Debt on an account may still be older than 15 years if it reached the  
26 15-year mark since the last time the write-off process was run.

27 B. The dollar of pre-program principal arrearages that exceeds 15 years in age,  
28 corresponding with the accounts included in response A.

- 1 C. The number of accounts who defaulted from tap at the time of recertification for being  
2 over-income. These figures differ slightly for Calendar Year 2018 from those in the  
3 council report provided in PA-III-22, and in response to PA-XVI-9 (based on the council  
4 reports) as the query was updated in 2019.
- 5 D. The dollar amount of pre-program principal arrearages that were owed by customers  
6 who defaulted from TAP at the time of recertification for being over-income,  
7 corresponding with the accounts included in response C.
- 8 E. The number of TAP participants who pre-paid their entire pre-program arrears prior to  
9 the forgiveness of those arrears.
- 10 F. Requirements for a customer to pay water debt in order to sell or refinance their home  
11 come from outside the City. This information cannot be generated or provided.  
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13 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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