

**SUPPLEMENTAL RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-2**

Dated: May 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 See attached payment patterns report (Attachment PA-XV-1). Please note that collection
11 rates remain lower in April 2020 through January 2021 relative to prior years.
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13 **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:

Please refer to the response to PA-XV-1.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.