Monthly Report

TO THE RATE BOARD AS REQUIRED BY THE FY2022-2023 RATE DETERMINATION

Philadelphia Water Department October 15, 2021





October 15, 2021

Philadelphia Water, Sewer and Storm Water Rate Board 1515 Arch Street, 17th Floor Philadelphia, PA 19102-1595

Chairman Popowsky and Members of the Rate Board:

Attached please find the second monthly report provided pursuant to the Philadelphia Water, Sewer and Storm Water Rate Board's Rate Determination, dated June 16, 2021, to document the Tiered Assistance Program ("TAP") enrollments, denials, turnovers, arrearage forgiveness (principal and penalty amounts), implementation of ratable forgiveness, as well as updates concerning tenant issues, language access, customer service and financial matters.

Thank you for your attention to this matter.

Very truly yours,

Susan Crosby, Esq. Deputy Revenue Commissioner Water Revenue Bureau Melissa LaBuda Deputy Water Commissioner, CFO Philadelphia Water Department

Enclosure

CC: Service List (2021 General Rate Case)

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1. EXECUTIVE SUMMARY

This report provides a monthly update for September 2021 regarding TAP enrollments, denials, turnovers, arrearage forgiveness, implementation of ratable forgiveness, as well as customer service and financial updates.

In September 2021,

- 159 applicants were enrolled in TAP, 115 of them for the first time.¹
- 230 customers received a total of \$73,570.35 in Penalty Forgiveness.²
- 2 customers received a total of \$1,218.00 in Principal Forgiveness.³
- 254 applications were denied.⁴
 - 26% of those denials were from already-existing TAP participants, whose change applications had missing or incomplete residency or income documentation. Those participants stayed in the program.
 - 0% of those denials were from already-existing TAP participants who were removed from the program because they were no longer eligible.
 - 74% of all denied applications were for applicants who have not participated in TAP before. Most were denied for missing or incomplete documentation.
 - Some customers made more than one application.

As of September, 2021, PWD and WRB have taken several steps to begin enhancing TAP participation and implementing ratable forgiveness. The Law Department has determined that there are no legal barriers to ratable forgiveness. Next steps to complete this policy shift and reflect same in rates include, at a minimum, updating Section 206.7 of PWD Regulations and obtaining Rate Board approval to recover the cost of arrearage forgiveness through the TAP-R Surcharge.

¹ See Tables 3-4, and Section 5.2.

² See Table 1.

³ See Table 2.

⁴ See Table 5.

2. INTRODUCTION

2.1 Required Reporting

This Monthly Report is provided pursuant to the June 16, 2021 Rate Determination of the Philadelphia Water, Sewer and Storm Water Rate Board ("Rate Board") and the Hearing Officer's Report, dated May 18, 2021 both rendered in the 2021 general rate proceeding (collectively referred to as the "Rate Determination"). Based on the Rate Determination, the Philadelphia Water Department ("Department" or "PWD") is required to report monthly on:

- Specific progress in PWD's arrearage forgiveness and Tiered Assistance Program (TAP), namely the "amount and type of arrearage forgiveness" PWD provides to TAP customers.
- PWD efforts to increase accessibility to the TAP program by implementing "ratable forgiveness" (allowing customers to earn partial arrearage forgiveness each month) and removing administrative constraints to implementation.
- PWD efforts to reduce the number of denied applications ("TAP denials") and program turnover, specifically the number leaving the program before receiving arrearage forgiveness.⁵

Sections 6 through 8 of this report also provide updates regarding TAP outreach, community meetings, language access, customer assistance and financial updates (as available quarterly or more frequently).

⁵ The Rate Determination outlines the following reporting requirements at pages 53-54:

Based on the record produced in this proceeding and in accordance with the discussions, findings and resolutions discussed above, we therefore... (8) require the Philadelphia Water Department to report monthly on the amount and type of arrearage forgiveness that PWD is providing to TAP customers, the result of its efforts to determine what legal and/or operational barriers must be overcome to implement ratable forgiveness for each month the TAP participant pays the TAP bill; and the efforts PWD is taking to reduce TAP denials and TAP churn." In this report, "TAP churn" is called "Program Turnover."

Reference: <u>https://www.phila.gov/media/20210618105014/2021-General-Rate-Determination-as-filed-with-Records-Dept-20210616.pdf</u>

3. ARREARAGE FORGIVENESS

3.1 Definitions

In this section, the definitions for important terms that have not been previously defined are as follows:

Penalty Arrearage Forgiveness: The process by which TAP participants are able to have penalty charges forgiven after 24 full payments of their TAP bills. The penalty forgiveness program was begun in July of 2017.

Principal Arrearage Forgiveness: The process by which TAP participants are able to have their unpaid water bills forgiven after 24 full payments of their TAP bills. The principal forgiveness program was begun in September of 2020. Note that customers who exit TAP because they are over-income are provided partial forgiveness of debt proportional to their principal forgiveness as of the time they exit TAP.

Enrollments (total): All customers who joined the TAP program and began participating this month. Includes customers who have never participated in TAP before (see below), as well as customers who had previously left TAP and now returned or recertified their enrollment in TAP.

First-Time Enrollees: Customers who have never participated in TAP before, and enrolled in TAP for the first time this month. These new TAP participants are a subset of total enrollments.

3.2 Forgiveness by Amount and Type

The information provided in the tables below is for the month of September 2021 (the "reporting period"). Table 1 documents the total penalty arrearages forgiven during the reporting period, broken down by amount of the participant's penalty debt forgiven. Table 2 documents the total principal arrearages forgiven during the reporting period, broken down by amount of the participant's penalty debt forgiven.

In Fiscal Year 2022 to date, a total of \$284,993.42 of Penalty Arrearage and \$27,296.00 of Principal Arrearage have been forgiven.

	-	• •		
	Participants	Amount	Amount	Total Amount
	Receiving	Forgiven in	Forgiven,	Forgiven,
Debt Range	Penalty	September	Previously	Reported to
	Forgiveness this		Reported	Date
	Month			
< \$0	-	\$-	\$-	\$-
\$0-\$200	172	\$8,173.24	\$10,585.06	\$18,758.30
\$200-\$500	27	\$8,437.92	\$13,165.92	\$21,603.84
\$500-\$1,000	14	\$10,400.44	\$12,306.58	\$22,707.02
\$1,000-\$2,000	7	\$8,957.93	\$26,516.82	\$35,474.75
\$2,000-\$5,000	7	\$20,137.98	\$36,025.97	\$56,163.95
\$5,000-\$10,000	3	\$17,462.84	\$20,660.77	\$38,123.61
\$10,000-\$20,000	-	\$-	\$-	\$-
\$20,000-\$50,000	-	\$-	\$-	\$-
\$50,000+	-	\$-	\$-	\$-
Total	230	73,570.35	19,261.12	\$192,831.47

Table 1. Total Penalty Arrearage Forgiven during September 2021

Table 2. Total Principal Arrearage Forgiven during September 2021

	Participants	Amount	Amount	Total Amount
	Receiving	Forgiven in	Forgiven,	Forgiven
Debt Range	Principal	September	Previously	Reported to
	Forgiveness this		Reported	Date
	Month			
< \$0	-	\$-	\$-	\$-
\$0-\$200	1	\$66.00	\$76.00	\$142.00
\$200-\$500	-	\$-	\$-	\$-
\$500-\$1,000	-	\$-	\$-	\$-
\$1,000-\$2,000	1	\$1,152.00	\$-	\$1,152.00
\$2,000-\$5,000	-	\$-	\$-	\$-
\$5,000-\$10,000	-	\$-	\$-	\$-
\$10,000-\$20,000	-	\$-	\$-	\$-
\$20,000-\$50,000	-	\$-	\$-	\$-
\$50,000+	-	\$-	\$-	\$-
Total	2	\$1,218.00	\$76.00	\$1,294.00

For first-time enrollees, pre-TAP debt that was newly protected from enforcement and made eligible for forgiveness is shown in Tables 3 and 4.

Туре	Total First-Time Enrollees with Debt by Type	Total Pre-TAP Debt
Principal	103	\$148,238.03
Penalty	68	\$16,965.26
Total	1156	\$165,203.29

Table 3. Pre-TAP Debt for September 2021 First-Time Enrollees

Table 4. September 2021 First-Time Enrollees by Income Guidelines and Associated Pre-TAP Debt⁷

Income Level as Compared to	Total Enrollees	Total Pre-TAP
Federal Poverty Guideline	I Otal Enronees	Debt
Up to 50%	24	\$38,690.54
Above 50% and up to 100%	54	\$77,907.28
Above 100% and up to 150%	32	\$37,504.13
Above 150% and up to 250%	3	\$7,389.12
Above 250%	2	\$3,712.22
Total	115	\$165,203.29

4. IMPLEMENTATION OF RATABLE FORGIVENESS

4.1 **Definitions**

In this section, the definitions for important terms that have not been previously defined are as follows:

Ratable forgiveness: The monthly proration of arrearage forgiveness. Each month a TAP participant makes a complete payment, 1/24th of their pre-program arrearage is vested

⁶ Note that the total of first-time enrollees is 115. The count of enrollees in the penalty and principal lines above does not sum to 115 because some customers appear in one category, neither category, or both categories, depending on whether they had only principal, only penalty, both penalty and principal, or no pre-TAP debt.

⁷ A similar report for all enrollees during the full calendar year is provided in the Annual Report to the Mayor on the Tiered Assistance Program (TAP), "Table 2. New Applicants Enrolled in TAP." The monthly data in Table 4 was reported on October 1, 2021.

Reference: <u>https://www.phila.gov/media/20210412104452/Tiered-Assistance-Program-TAP-2020-annual-report.pdf</u>

immediately. This vested amount is retained even if a participant leaves TAP and later returns to the program.

Legal considerations: Legal and administrative restrictions or conflicts preventing or slowing down the introduction of ratable forgiveness as described above.

Operational challenges: Technical, technological, staffing, or other factors preventing or slowing down the introduction of ratable forgiveness as described above.

TAP Pause: A change to the forgiveness process whereby a customer's 24-month progress towards arrearage forgiveness is "paused," rather than lost, if they leave TAP for any reason, and the customer can resume their progress upon returning to TAP, rather than starting over.

4.2 Discussion

Implementing ratable forgiveness is dependent on the following considerations.⁸

Legal considerations: There are currently no legal barriers to the implementation of ratable forgiveness. To proceed with this change, at a minimum, Section 206.7 of the Philadelphia Water Department Regulations must be updated and Rate Board approval must be obtained to recover the cost of arrearage forgiveness in rates.

Operational challenges: There are currently no operational barriers to the implementation of ratable forgiveness, although there are resource constraints. Changes to the basis2 billing system are necessary to begin implementing the program, which require resources for development and significant testing, and would need to be prioritized among other important initiatives.

4.3 This Month's Updates

The Law Department has determined that there are no legal barriers to implementing ratable forgiveness, and in September, the City received the necessary approvals to begin to develop a plan to change the current TAP forgiveness policy and to update the PWD Regulations to include ratable forgiveness.

Several steps are required in order for the updated approach to be implemented. As discussed, Regulation updates are required, as is communication with customers about the upcoming change and how it will be reflected on bills. The Departments are establishing further steps and a timeline, which they expect to communicate in the next monthly report.

⁸ The Water Rate Board's Rate Determination requires a discussion of "barriers" to implementation. There are no barriers, so this section of the report addresses considerations for implementation instead.

5. PWD EFFORTS TO REDUCE TAP DENIALS AND PROGRAM TURNOVER

5.1 Definitions

In this section, the definitions for important terms that have not been previously defined are as follows:

TAP Denials: TAP application outcomes in which applicants are not enrolled in the program. Applicants can be denied for TAP for one of six reasons:

- Failure to meet income and residency guidelines;
- Failure to meet income guidelines (without a Special Hardship);
- Failure to meet residency guidelines;
- Installation type is not eligible for TAP;
- Missing or invalid income or residency documentation; or
- Missing information on the application form.

Program Turnover: Reduction in TAP participation due to failure to meet income or residency guidelines, missing or invalid documentation, failure to recertify or other reasons including a determination that the customer will have a more affordable bill under another assistance program or other billing arrangement.

More Affordable Alternatives: Some customers qualify for assistance programs outside of TAP, and based on their individual circumstances, these programs may be a more affordable option.

5.2 Discussion

In September, 159 applicants were approved for enrollment in TAP, and 289 applicants were not. Of those applications that were technically not approved, 67 applicants were already enrolled in TAP at the time of the application submittal, and none resulted in the actual removal from TAP for failure to meet income or residency, or for placement in a more affordable alternative.

These data are set forth in Table 5 below. The numbers below reflect the number of applications, rather than the number of customers, as customers can make multiple applications.

0 1	
	Applicants Already
Total Count	Participating in TAP
1	0
2	0
6	0
10	0
0	0
221	66
2	1
12	0
<u>254</u>	<u>67</u>
	67
	0
187	
9	0
5	0
5	1
16	1
0	0
35	2
0	0
0	0
0	0
	1 2 6 10 0 221 2 12 254 187 9 5 5 16 0 35 0 0

Table 5. Denials: Applicants Not Enrolled in TAP⁹ during September 2021

⁹ An annualized version of this report is included in the Annual Report to the Mayor On The Tiered Assistance Program (TAP), "Table 4. Applicants Not Enrolled." This monthly data was reported on October 1, 2021.

¹⁰ Apart from recertification, customers in TAP who reapply and have their application denied for being incomplete are not removed from TAP. Only those who are denied for cause or are approved for a more affordable alternative are removed from TAP.

¹¹ Senior Citizen Discounted Bill or Regular Bill may also include a standard payment agreement.

¹² When customers had more than one application in progress at the same time, information was transferred to the newest application for processing, older applications were categorized as "Data Transfer," and were no longer processed. Similarly, previously denied applications were transferred for re-evaluation when WRB identified available OOPA information or the customer submitted additional required documentation after denial. The subsequent approvals or denials are also captured in these figures.

As stated in the previous section, the introduction of "TAP Pause" will address some concerns about Program Turnover, as customers leaving and returning to the program will pick up where they left off on earning principal and penalty forgiveness, rather than starting anew.

5.3 Efforts to Reduce TAP Denials and Program Turnover

As shown above, the largest portion of denials are due to missing or invalid income or residency documentation. To address this factor, the Water Revenue Board has redesigned the TAP application checklist to clarify and communicate the documentation requirements and has begun including a customer's water bill with the submitted application materials to serve as one portion of the proof of residency requirement, if needed. The RCAS will review the checklist in an upcoming meeting. See Appendix B for the checklist.

5.4 This Month's Updates

TAP recertifications were restarted in September. WRB is currently processing 100 TAP participants for recertification per business day. Customers have 60 days to submit a complete application for review, so, none have been removed from the TAP program for failing to recertify this month. However, the recertification process is now underway, which can lead to customers being removed from the program, either for failure to recertify or as denials for cause, in the future.

6. QUARTERLY UPDATES

PWD will also provide at least quarterly updates to the Rate Board with respect to certain customer service and policy issues identified in the Settlement, as set forth in this Section. Please note that only Section 6.2 has updated information for September.

6.1 Storm Water Cost of Service and Benefit Allocation Issues

The Water Department has initiated internal planning discussions to:

- 1. Begin to evaluate potential alternative residential rate structures; and
- 2. Identify and evaluate potential options for the recovery of non-residential stormwater overflow remediation projects.

Please note that the evaluation of cost of service and benefit allocation issues will involve the Department and multiple external stakeholders. PWD staff are developing a plan to engage these stakeholders.

6.2 Customer Service and Policy Issues

1. TAP Recertification:

TAP recertifications were restarted in September. PWD is considering the merits of establishing a longer period of TAP recertification for certain groups such as pensioners, SSI and LIHEAP recipients.

2. TAP Outreach/Participation:

In this quarter, WRB/PWD engaged in the following activities in support of achieving greater TAP participation, attaining more affordable bills for vulnerable households and evaluating various approaches to inform more customers of TAP and other assistance programs:

- WRB concluded a program in which it reached out to existing TAP customers, inviting them to submit updated income information and receive the most affordable bill. To date, this program has generated over 15,000 applications mailed to TAP participants and resulted in over 6,000 applications returned to WRB. The applications received this month are included in the monthly reporting above.
- WRB began a campaign of moving customers from the WRBCC assistance program into TAP, where reasonable, so they can begin benefitting from arrearage forgiveness.
- PWD is currently planning community meetings, summits and other gatherings, including meetings with Black community leaders and black grassroots community members.

Based on the results of this quarter's outreach/participation efforts, PWD will evaluate the approaches of next quarter.

A RCAS meeting was held in July, and a TAP sub-committee meeting is being scheduled. A summary of the July meeting is provided in Appendix A. The next RCAS meeting is scheduled for October 8, 2021.

3. Language Access:

See "Tenant Issues" in 6.3.2, below.

4. Moratorium on Shut-Offs:

In this quarter, PWD reviewed and evaluated the need to extend the current moratorium, finding that its scheduled ending in April 2022 is still reasonable. Prior to lifting the moratorium, PWD plans to consult with stakeholders to evaluate the feasibility or necessity of extending the moratorium considering public health guidance and economic conditions.

6.3 COVID-19 Protections

1. Payment agreements:

In this quarter, PWD evaluated different payment arrangement options, and determined that offering them would prevent PWD from delivering debt protection to TAP customers, developing the Philadelphia Housing Development Corporation program, and progressing towards the resumption of normal collection practices after COVID. In order to provide the most possible support to customers, PWD will not be allocating vital programming and testing resources within the billing system towards providing new payment agreement options.

2. Tenant issues:

To address certain tenant issues, such as establishing tenant accounts, proof of residency, PWD continues to review its business practices, website disclosures and regulations regarding establishing a tenant account and in conjunction with the Law Department reviewed its policies to facilitate tenants opting to request transfer pre-existing arrearages into their account.

In making its review this quarter, PWD found that its business practices, website disclosures, and regulations regarding establishing a tenant account are not in sync. PWD will continue to work with the Law Department to bring synergy around this issue.

PWD has updated its website with the Simplified Chinese and Spanish request forms in addition to the existing English. The links to these forms are below:

- Become a tenant water customer | Department of Revenue | City of Philadelphia
- Become a commercial tenant water customer | Department of Revenue | City of Philadelphia
- Become an occupant water customer | Department of Revenue | City of Philadelphia

7. CUSTOMER ASSISTANCE UPDATES

This section details customer assistance dollars that PWD is working with outside entities to process for its customers. These programs are:

- PHDC: Philadelphia Housing Development Corporation. Provides emergency rental assistance for renters and landlords. PHDC is currently administering federal COVID relief dollars
- UESF: Utilities Emergency Services. Provides financial assistance/grants to utility customers with low-income facing or experiencing shut-offs. Water grants are matched by PWD. UESF has introduced Rapid Assistance Development, which provides added flexibility. UESF funding is included here as part of the assistance provided to customers, however, unlike PHDC funds, UESF dollars do not come from the federal government and should not be considered in the reconciliation/adjustment process.
- LIHWAP: Low Income Household Water Assistance Program. Federal program introduced in 2021 to provide low-income households with financial assistance on water and wastewater bills.

7.1 Rental Assistance and Emergency Services Funding

During September 2021, a total of \$ \$333,511.51 in rental assistance from PHDC and emergency grant funding from UESF was applied to customer accounts.

A summary of the 2022 fiscal year PHDC and UESF grants is shown in Table 6. Table 7 shows PHDC payments from July to September of 2021. Table 8 shows UESF payments from July to September of 2021. All tables are based on data reported on September 30, 2021. In addition to these funds, PWD matches some UESF grants.

Source	Count	Amount
UESF	235	\$256,639.42
PHDC	1203	\$854,615.60
TOTAL	1,438	\$1,111,255.02

Table 6. Summary of UESF and PHDC Grants, Fiscal Year 2022 (to date)

Table 7. PHDC Grants by Month July- September 2021 (FY 2022)

Month	Total Amount
July 2021	\$361,922.86
August 2021	\$335,532.40
September 2021	\$157,160.34
TOTAL	\$854,615.60

Table 8. UESF Grants by Month July- September 2021 (FY 2022)

Month	Total Amount
July 2021	\$25,288.82
August 2021	\$54,999.43
September 2021	\$176,351.17
TOTAL	\$256,639.42

7.2 Commonwealth's LIHWAP Program

During July 2021, PWD/WRB and the Mayor's Office reviewed and submitted comments to the Commonwealth's proposed LIHWAP Model State Plan. There are no updates for this program in September.

8. DEPARTMENT EFFORTS TO PURSUE FEDERAL ASSISTANCE AND OTHER FINANCIAL UPDATES

To date, PWD has pursued and is continuing to pursue federal funding. This section documents efforts to secure federal funding and the overall rating agency posture. In June 2021, the City sold \$368.7 million of Water and Wastewater Revenue Refunding Bonds, garnering net present value savings (17.4% of refunded par) for the Water Department over the next 25 years. These savings will help the Philadelphia Water Department (PWD) continue to make crucial system-wide investments in water and wastewater infrastructure while minimizing debt service costs.

Assistance Program/ Requesting Organization	Date Submitted	Status	Amount Awarded Or Requested	Notes
PennVest	April 2020	Awarded	\$80.8M loan	Rehabilitation of the Torresdale Filtered Water Pump Station. The loan closed in February 2021.
PennVest	January 2021	Awarded	\$95.0M loan; \$5.1M funding offer	PennVest approved a loan and three funding offers to the City for the construction of the new preliminary treatment building at the Northeast Water Pollution Control Plant. The new facility will increase the plant's wet-weather treatment capacity.
PennVest	January 2021	Awarded	\$6M loan	PennVest loan to finance stormwater improvements in the Lawncrest neighborhood as part of the City's GCCP Program and COA target compliance
PennVest	August 2021	Awarded	\$20.7M loan	Draw-down loan to fund improvements to the City-owned Flat Rock Dam and introduce flow into the Manayunk Canal
Water Infrastructure Finance and Innovation Act (WIFIA) Letter of Interest	July 2021	Pending	\$500M	Under WIFIA, federal aid can cover up to 49% of project eligible costs.
PennVest	August 2021	Pending	\$40.4M	PennVest loan to fund water main replacements in the City of Philadelphia. This application is expected to be considered for approval on or about November 3, 2021
PennVest	Anticipated November 2021	Pre- Submittal	\$10M	PennVest loan to fund stormwater improvements in the City. This application is expected to be submitted prior to November 3, 2021.
PEMA/FEMA Building Resilient Infrastructure and Communities (BRIC)	Anticipated November 2021	Pre- Submittal	~\$25M	Grant from PEMA/FEMA with an application deadline of November 1, 2021.

APPENDIX A: AGENDA FOR OCTOBER RCAS COMMITTEE MEETING

Residential Customer Assistance and Services (RCAS) Committee Meeting

Friday, October 8 – 10 AM Microsoft Teams meeting

Proposed Agenda

Partner Updates

CAP Advertising Update

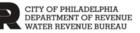
Review of Revised TAP Application Checklist

Review Online Map - "Partner Sites for PWD Customer Assistance Program

Discussion: What can PWD/WRB do to expand the capacity of our partners to assist customers?

APPENDIX B: TAP APPLICATION CHECKLIST

Customer Assistance Application



This form is used to apply for assistance, including the Tiered Assistance Program (TAP) and Senior Citizen Discount. For customers currently enrolled in existing assistance programs, this form can also be used to apply for recertification.

How to Complete this Form

- Read. Read through the entire application first, including the Program Eligibility Guidelines.
- Gather. Use the checklist below to help make sure you've gathered all the information and documentation you'll need.
- Fill & Sign. Fill in the form. Sign the bottom section of Part 1 and Part 2, and sign any of the attachments that apply to your application.
- Enclose. Place copies of all required documentation in the envelope. Please do not send originals; supporting documents sent will NOT be returned.
- Submit. When you're finished, you can mail your completed form and documentation to us at:

Water Revenue Bureau Customer Assistance Application Processing Center P.O. Box 51270, Philadelphia, PA 19115

Need in-person help with your application? Contact the Utility Emergency Services Fund (UESF) hotline at (855) 827-8373.

Questions on your application? Email watercap@phila.gov. Note: Application materials cannot be submitted over email.

(f l) If you requested this application because you were in danger of shut off, submit your application within 14 days to avoid shutoff. Application Checklist: Here's what you'll need to gather in order to fill out this application. **Applicant &** We'll ask for names, birth dates, monthly income amounts and social security or tax ID numbers for household members, including the applicant. Household Info You will need to submit documentation for TWO DIFFERENT categories listed below. Proof of Residency · Current government issued ID (like driver license or ID card) with current address · Voter registration card · Written lease or rent receipts that show residency during the last six months · Utility bills (like WRB, PGW, PECO, cable, or landline) must include service and mailing If you submit documentation addresses from one of these categories, Mortgage statements you will need at least two bills or statements dated in Student loan billing statements the last six months for each. Bank statements · Any of the Income Documentation types below, except income support form. Note the same document cannot be used for both Proof of Residency and Income Documentation. You will need ONE of the following, dated in the last 12 months, for EACH source of income Income п in the household. If you are reporting zero income, we will ask about how you pay for living Documentation expenses in Attachment B. Prior year's federal income tax return or W-2 · Pay stubs (must be consecutive and cover at least 30 days) · Benefit award letters or statements (such as unemployment compensation printout, worker's compensation award, Social Security, pension, or welfare benefits) Income support form (Attachment A) If you are claiming special hardship: Note additional documentation is required to support your hardship claim, as detailed in Attachment C. Translation available: Español | 國語 | Tiếng Việt | Русский | ភាសាខ្មែរ | 廣東話 | Português | Italiano 📢 215.685.6300