

**RESPONSE TO**  
**PUBLIC ADVOCATE'S INTERROGATORIES**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**QUESTIONS 16-17**

**Dated: March 2022**

1 **PA-TAP-16.** REFERENCE THE RESPONSE TO PA-TAP-4. PLEASE PROVIDE THE  
2 NUMBER OF LIHWAP RECIPIENTS (ACTUAL OR ESTIMATED) THAT  
3 ALREADY PARTICIPATE IN PWD/WRB ASSISTANCE PROGRAMS.  
4

5 **RESPONSE:**

6 The following are numbers of LIHWAP recipients that already participate in PWD/WRB  
7 assistance programs as of 2/25/22.

- 8 • Senior Citizen – 26
- 9 • TAP Income – 106
- 10 • TAP Hardship – 1
- 11 • Long Standard Payment Agreement – 1
- 12 • WRBCC Agreement – 1

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14 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-TAP-17. REFERENCE SCHEDULE RFC-3, TRR\_PROJECTIONS TAB.**

2 A. PLEASE EXPLAIN HOW THE MONTHLY INCREASE IN PARTICIPANTS  
3 OF 1,000, 2,000, 2,250, 3,500, AND 3,750 WERE DERIVED FOR THE  
4 MONTHS OF JULY 2022 THROUGH NOVEMBER 2022 RESPECTIVELY.

5 B. PLEASE EXPLAIN WHY NO INCREASE IS ASSUMED FOR DECEMBER  
6 2022.

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8 **RESPONSE:**

9 A. The projections anticipate auto-enrollment of a total of 12,500 customers after  
10 LIHWAP's introduction. It is anticipated that these auto-enrollments will not all take  
11 place at once, but will ramp up over the course of several months. The monthly  
12 increases were chosen as amounts that total 12,500 customers and increase in number  
13 each month as more customers enroll in LIHWAP and technical capacity for auto-  
14 enrollment expands.

15 B. No increase is assumed for December 2022 because the projection assumes that all  
16 12,500 accounts eligible for auto-enrollment in TAP will be enrolled by November  
17 2022.

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19 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**RESPONSE TO**  
**PUBLIC ADVOCATE'S INTERROGATORIES**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**QUESTIONS 17-25**

**Dated: March 2022**

1 **PA-TAP-17. PLEASE PROVIDE A SCHEDULE SETTING FORTH:**

- 2           A. THE NUMBER OF LIHWAP APPLICANTS TO DATE, SPECIFYING HOW  
3           MANY ARE PWD'S NAMED CUSTOMER;  
4           B. THE NUMBER OF LIHWAP APPROVALS TO DATE, AND;  
5           C. AVERAGE GRANT AMOUNT.

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7 **RESPONSE:**

8           The following responses are based on LIHWAP grants to PWD customers. The responses  
9           are not based on applications, approvals, and/or grants made by the Commonwealth which  
10          are statewide and not reported to WRB/PWD.

11  
12          From 2/25/22 reporting:

- 13          A. Reporting is under development and not available at this time.  
14          B. Grantees to date – 460  
15          C. Average grant amount - \$1,401.96

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17 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc. and Water Revenue Bureau  
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1 **PA-TAP-18.** PLEASE CONFIRM THAT AUTO-ENROLLMENT IN TAP FOR LIHWAP  
2 RECIPIENTS WILL BE CONTINGENT UPON THE RECIPIENT BEING THE  
3 WATER DEPARTMENT'S NAMED CUSTOMER.  
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5 **RESPONSE:**

6 This is confirmed.  
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8 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-TAP-19. IS THE WATER DEPARTMENT MAKING ANY CHANGES TO ITS**  
2 **CHAPTER 1 REGULATIONS CONCERNING CUSTOMER STATUS?**

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4 **RESPONSE:**

5 No.

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7 **RESPONSE PROVIDED BY:** City of Philadelphia Water Department

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1 **PA-TAP-20.** ACCORDING TO THE NATIONAL ENERGY & UTILITY AFFORDABILITY  
2 COALITION ([HTTPS://NEUAC.ORG/WP-](https://neuac.org/wp-content/uploads/2021/02/pennsylvania-state-sheet-2022.pdf)  
3 [CONTENT/UPLOADS/2021/02/PENNSYLVANIA-STATE-SHEET-2022.PDF](https://neuac.org/wp-content/uploads/2021/02/pennsylvania-state-sheet-2022.pdf))  
4 PENNSYLVANIA RECEIVED \$202,960,781 IN LIHEAP FUNDING IN 2020.  
5 PENNSYLVANIA'S ALLOCATION OF LIHWAP FUNDING IS  
6 APPROXIMATELY \$43.2 MILLION  
7 ([HTTPS://WWW.MEDIA.PA.GOV/PAGES/DHS\\_DETAILS.ASPX?NEWSID=7](https://www.media.pa.gov/pages/dhs_details.aspx?newsid=782)  
8 82). PLEASE EXPLAIN HOW THIS FUNDING DIFFERENTIAL WAS  
9 FACTORED INTO THE PROJECTION OF FUTURE TAP ENROLLMENT  
10 ASSOCIATED WITH LIHWAP AUTO-ENROLLMENT.  
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12 **RESPONSE:**

13 The Pennsylvania allocation is for the entire state on a first-come, first-served basis.  
14 Philadelphia is not guaranteed a specific portion of the allocation. This was not factored  
15 into the projection of future TAP enrollment associated with LIHWAP auto-enrollment.  
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17 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc. and Water Revenue Bureau  
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1 **PA-TAP-21.** FOR THE 2020-2021 WINTER HEATING SEASON, MAXIMUM LIHEAP  
2 GRANT AMOUNTS WERE \$1,000 (CASH COMPONENT) AND \$800 (CRISIS  
3 COMPONENT). MAXIMUM LIHWAP GRANT AMOUNTS ARE \$5,000 FOR  
4 A COMBINED WATER AND WASTEWATER BILL. PLEASE EXPLAIN  
5 HOW THIS DIFFERENCE IN GRANT AMOUNT WAS FACTORED INTO  
6 THE PROJECTION OF FUTURE TAP ENROLLMENT ASSOCIATED WITH  
7 LIHWAP AUTO-ENROLLMENT.

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9 **RESPONSE:**

10 This was not factored into the projection of future TAP enrollment associated with  
11 LIHWAP auto-enrollment.

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13 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-TAP-22.** ACCORDING TO THE LIHWAP HANDBOOK (AVAILABLE AT  
2 [HTTP://SERVICES.DPW.STATE.PA.US/OIMPOLICYMANUALS/LIHWAP/IN](http://services.dpw.state.pa.us/oimpolicymanuals/lihwap/index.htm#t=ops-)  
3 [DEX.HTM#T=OPS-](http://services.dpw.state.pa.us/oimpolicymanuals/lihwap/index.htm#t=ops-)  
4 [MEMO\\_POLICY\\_CLARIFICATIONS%2FLIHWAP\\_HANDBOOK.HTM](http://services.dpw.state.pa.us/oimpolicymanuals/lihwap/index.htm#t=ops-))  
5 HOUSEHOLDS ARE ELIGIBLE FOR ASSISTANCE IF THEY ARE  
6 RESPONSIBLE FOR THE BILL, EVEN IF THE BILL IS IN THE NAME OF A  
7 NON-HOUSEHOLD MEMBER, SUCH AS A LANDLORD. PLEASE  
8 EXPLAIN HOW THE PROJECTION OF FUTURE TAP ENROLLMENT TOOK  
9 INTO ACCOUNT THE NUMBER OF LIHWAP ELIGIBLE HOUSEHOLDS  
10 WHO ARE NOT PWD'S NAMED CUSTOMER.  
11

12 **RESPONSE:**

13 To qualify for TAP, a customer must be the named customer. The projections developed  
14 assume that anyone who is eligible for LIHWAP is eligible for TAP and can become the  
15 customer of record.  
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17 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-TAP-23.** ACCORDING TO THE FINAL WEEKLY ENERGY ASSISTANCE  
2 SUMMARY (EASUM) PRODUCED BY PENNSYLVANIA'S DEPARTMENT  
3 OF HUMAN SERVICES (DHS) FOR THE 2020-2021 LIHEAP SEASON, 64%  
4 OF LIHEAP CASH GRANTS WERE PAID TO ACCOUNTS WHERE THE  
5 CUSTOMER IS NOT THE PROPERTY OWNER. LIKEWISE, 67% OF  
6 LIHEAP CRISIS GRANTS WERE PAID TO NON-OWNERS. PLEASE  
7 EXPLAIN HOW THE PROJECTION OF FUTURE TAP ENROLLMENT TOOK  
8 INTO ACCOUNT THAT THE MAJORITY OF LIHEAP RECIPIENTS ARE  
9 NOT PROPERTY OWNERS.

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11 **RESPONSE:**

12 To qualify for TAP, a customer must be the named customer. The projections developed  
13 assume that anyone who is eligible for LIHWAP is eligible for TAP and can become the  
14 customer of record.

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16 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-TAP-24.** OF THE 17,148 PARTICIPANTS IN TAP IN DECEMBER 2021, PLEASE  
2 IDENTIFY HOW MANY ARE OWNERS, HOW MANY ARE TENANTS, AND  
3 HOW MANY ARE OCCUPANT CUSTOMERS.  
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5 **RESPONSE:**

6 No such report exists.  
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8 **RESPONSE PROVIDED BY:** City of Philadelphia Water Department  
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1 **PA-TAP-25.** REFERENCE SCHEDULE RFC-4 AT 2. PLEASE PROVIDE DETAILED  
2 SUPPORT FOR THE STATEMENT “MANY OF PGW’S ASSISTANCE  
3 PROGRAM PARTICIPANTS ARE ALSO PWD CUSTOMERS.” PROVIDE  
4 COPIES OF ALL DATA RELIED UPON FOR THIS STATEMENT.

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6 **RESPONSE:**

7 This was an assumption that was made due to the service area overlap of PGW and PWD.

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9 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

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