

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 5-15

Dated: March 2022

1 **PA-TAP-5.** REFERENCE SCHEDULE RFC-4, PAGE 1. PLEASE PROVIDE COPIES OF
2 THE ELIGIBILITY REQUIREMENTS FOR PGW'S CUSTOMER
3 RESPONSIBILITY PROGRAM AND SENIOR DISCOUNT PROGRAM THAT
4 WERE USED IN YOUR ANALYSIS.

5
6 **RESPONSE:**

7 We do not have insight on the eligibility requirements for PGW's Customer Responsibility
8 Program or senior discount program beyond publicly available data. The following links are
9 available on PGW's website.

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11 Income eligibility for the CRP program:

12 https://www.pgworks.com/uploads/pdfs/CRP_Eligibility_March_2018.pdf

13
14 Income eligibility for CRP, LIHEAP and UESF:

15 https://www.pgworks.com/uploads/pdfs/Assistance_Programs_Eligibility_2021.pdf

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17 CRP application:

18 https://www.pgworks.com/uploads/media/CRP_Application-English.pdf

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

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PA-TAP-6. REFERENCE SCHEDULE RFC-4, PAGE 1. PLEASE PROVIDE YOUR UNDERSTANDING OF WHY PWD HAS MORE ACTIVE PARTICIPANTS THAN PGW IN ITS SENIOR CITIZEN DISCOUNT PROGRAM, AS A PERCENTAGE OF TOTAL ASSISTANCE PROGRAM PARTICIPATION.

RESPONSE:

Please be aware that the PGW senior discount program was closed to new participants in 2003. The pool of participants grows lower every year. PWD continues to enroll customers in the Senior Citizen Discount.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-TAP-7.** REFERENCE SCHEDULE RFC-4, PAGE 2. PLEASE PROVIDE THE BASIS
2 FOR THE STATEMENT THAT "...IT IS ASSUMED FOR THESE
3 PROJECTIONS THAT LIHWAP PARTICIPATION RATES WOULD
4 RESEMBLE THOSE OF LIHEAP." IN YOUR RESPONSE, PLEASE PROVIDE
5 ANY SUPPORTING DOCUMENTATION AND OR OTHER EVIDENCE
6 THAT SHOWS THAT LIHWAP WILL BE ADMINISTERED IN THE SAME
7 MANNER AS LIHEAP.

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9 **RESPONSE:**

10 LIHWAP was modeled after LIHEAP and the assumption was made that the participation
11 rates would therefore resemble those of LIHEAP.

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13 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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PA-TAP-8. REFERENCE SCHEDULE RFC-4, PAGE 2. PLEASE PROVIDE DOCUMENTATION SHOWING THE BASIS FOR THE STATEMENT “...IT IS ASSUMED THAT MUCH OF THE DIFFERENCE IN THE NUMBER OF TOTAL PARTICIPANTS CAN BE ATTRIBUTED TO LIHEAP PARTICIPATION.”

RESPONSE:

This was an assumption that was made after analyzing the PGW and PWD assistance participant numbers. The documentation for this statement is the participant numbers referenced in Schedule RFC-4.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-TAP-9.** REFERENCE SCHEDULE RFC-4, PAGE 1. IT IS STATED THAT "...THE
2 CITY OF PHILADELPHIA IS WORKING WITH THE COMMONWEALTH OF
3 PENNSYLVANIA TO DEVISE A PROCESS TO EXPEDITE THE
4 ELIGIBILITY DETERMINATION FOR TAP." PLEASE PROVIDE THE CITY
5 AND COMMONWEALTH'S RESPECTIVE ESTIMATES OF THE EXPECTED
6 NUMBER OF PARTICIPANTS.

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8 **RESPONSE:**

9 The City's estimate of the expected number of participants is our estimate, reflected in
10 Schedule RFC-4. We do not know the Commonwealth's estimate of the expected number
11 of participants.

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

1 **PA-TAP-10.** REFERENCE SCHEDULE RFC-4, PAGE 1. PLEASE EXPLAIN WHY THE
2 FOLLOWING STATEMENT IS OF SIGNIFICANCE: “PGW RECEIVED
3 ROUGHLY 26,000 LIHEAP GRANTS IN FY 2021 (ABOUT HALF OF THEIR
4 CRP CUSTOMERS PROVIDE A GRANT TO PGW).” PLEASE PROVIDE THE
5 PERSPECTIVE FOR THIS STATEMENT.
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7 **RESPONSE:**

8 This statement helps contextualize the previous sentence in Schedule RFC-4.
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10 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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PA-TAP-11. PLEASE PROVIDE THE DATA SHOWING THE LEVEL OF PARTICIPATION IN THE FIRST FIVE YEARS OF PGW'S PARTICIPATION IN THE LIHEAP PROGRAM.

RESPONSE:

We do not have the level of participation in the first five years of PGW's participation in the LIHEAP program.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-TAP-12.** PLEASE PROVIDE THE ENROLLMENT ELIGIBILITY REQUIREMENTS
2 FOR LIHEAP AND LIHWAP.

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4 **RESPONSE:**

5 The City does not administer these programs. These data are publicly available from the
6 Commonwealth. Please see the following links:

7 <https://www.dhs.pa.gov/Services/Assistance/Pages/LIHEAP.aspx>

8 <https://www.dhs.pa.gov/Services/Assistance/Pages/LIHWAP.aspx>

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10 **RESPONSE PROVIDED BY:** The City of Philadelphia

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PA-TAP-13. PLEASE EXPLAIN WHETHER, WITH AUTOMATIC ENROLLMENT, THE
CUSTOMER HAS THE POWER TO OPT OUT OF THE LIHWAP PROGRAM.

RESPONSE:

The City does not administer the LIHWAP program.

RESPONSE PROVIDED BY: The City of Philadelphia

1 **PA-TAP-14.** PLEASE EXPLAIN WHETHER THE CUSTOMER HAS THE POWER TO OPT
2 OUT OF THE LIHEAP PROGRAM.

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4 **RESPONSE:**

5 The City does not administer the LIHEAP program.

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7 **RESPONSE PROVIDED BY:** The City of Philadelphia

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1 **PA-TAP-15.** PLEASE PROVIDE THE SUPPORTING BASIS, INCLUDING ANY
2 SUPPORTING DOCUMENTATION, FOR THE FOLLOWING STATEMENT:
3 “SINCE THE INCOME AND HOUSEHOLD SIZE OF LIHWAP APPLICANTS
4 IS CURRENTLY UNKNOWN, AND SINCE TAP DISCOUNTS ARE BASED
5 ON INCOME AND HOUSEHOLD SIZE, THE PROJECTION ASSUMES THAT
6 THE AVERAGE CUSTOMER DISCOUNT WILL BE THE SAME AS THE
7 CURRENT TAP AVERAGE DISCOUNT.”
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9 **RESPONSE:**

10 Because the only available supporting basis for projections for automatic enrollment
11 discounts is the average TAP customer discount, and because the customer base for TAP
12 and LIHWAP are similar, the projections use the average TAP discount.
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14 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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