

PHILADELPHIA WATER DEPARTMENT  
STATEMENT 5

BEFORE THE  
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater and Stormwater Rates and Related Charges	Fiscal Years 2026 - 2027
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**Direct Testimony**

**of**

**Susan M. Crosby and  
Lakisha Gaymon-Foreman**

**on behalf of**

**the Department of Revenue**

Dated: February 2025

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**I. INTRODUCTION AND PURPOSE OF TESTIMONY**

**Q1. PLEASE STATE YOUR NAME AND POSITION WITH THE DEPARTMENT OF REVENUE.**

A1. My name is Susan M. Crosby and I serve as the Deputy Revenue Commissioner for Water and lead the Water Revenue Bureau (“WRB”).

Testifying with me is Lakisha Gaymon-Foreman, who serves as the Manager of the Customer Assistance Programs Division within the WRB.

**Q2. WOULD EACH OF YOU PLEASE DESCRIBE YOUR JOB RESPONSIBILITIES, EXPERIENCE AND EDUCATIONAL BACKGROUND?**

A2. Our respective backgrounds and experience are summarized below:

Ms. Crosby

I am employed by the City of Philadelphia’s (“City”) Department of Revenue (“Revenue”) and I oversee the operations of the WRB: including billing, accounting, collection activities, as well as the customer operations and customer assistance functions for the Philadelphia Water Department (“PWD” or “Department”).

I hold a Bachelor of Science in History and in Political Science from Florida State University and a Juris Doctor from Stetson University College of Law. Prior to my tenure with Revenue, I was employed by the City Law Department as a Divisional Deputy City Solicitor. My resume of experience is attached as Schedule SMC-1.

Ms. Gaymon-Foreman

I am the Manager of the Customer Assistance Programs Division within the WRB. In April 2015, I joined the WRB as a Collection Customer Representative. After a series of promotions, I was appointed to my current position in July 2022. My resume of experience is attached as Schedule LGF-1.

**Q3. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

A3. The purpose of our testimony is to: (i) provide an overview of the WRB; (ii) discuss customer assistance programs administered by the WRB, including payment agreements and special rates available to eligible customers under the Tiered Assistance Program (“TAP”) and Senior Citizen Discount; (iii) discuss billing and collection activities; and (iv) provide an overview of recent enhancements to TAP.

**Q4. PLEASE IDENTIFY THE SCHEDULES THAT ACCOMPANY YOUR DIRECT TESTIMONY.**

A4. The following schedules accompany my testimony:

Schedule SMC-1: Resume of Susan M. Crosby

Schedule SMC-2: Proposed Charity Rate Regulations

Schedule LGF-1: Resume of Lakisha Gaymon-Foreman

**II. OVERVIEW OF THE WATER REVENUE BUREAU**

**Q5. PLEASE DESCRIBE THE WATER REVENUE BUREAU AND THE SPECIFIC SERVICES IT PROVIDES TO THE PHILADELPHIA WATER DEPARTMENT.**

1 A5. The WRB is part of Revenue. Under Section 6-201 of the Philadelphia Home Rule  
2 Charter, Revenue performs all functions relating to billing and collections on customer  
3 accounts for the PWD through the WRB. The wages and salaries of approximately 332  
4 employees in Revenue are funded by the PWD, with 221 of those employees working  
5 exclusively in the WRB.

6  
7 **Q6. PLEASE DESCRIBE THE WRB'S ACTIVITIES RELATED TO CUSTOMER**  
8 **SERVICE, BILLING, COLLECTIONS AND CUSTOMER ASSISTANCE**  
9 **PROGRAMS.**

10 A6. The WRB provides customer support services related to applications for service,  
11 applications for tenancy and occupancy, change of billing address, meter reading  
12 inquiries, billing inquiries, billing disputes, and payment arrangements at our Customer  
13 Services Centers. The WRB administers income-based customer assistance programs,  
14 including TAP and the Senior Citizen Discount. In fiscal year ("FY") 2024,  
15 approximately 29,484 customers visited the WRB intake offices in Center City. In  
16 addition, customers can visit the Northeast Philadelphia Municipal Services Center for  
17 assistance. Approximately 8,647 customers visited the Northeast location in FY 2024. As  
18 of November 12, 2024, the Department of Revenue reopened its third customer service  
19 location to the public, the North Philadelphia Services Center at 2761 N 22<sup>nd</sup> Street  
20 (Hope Plaza) which had been closed since 2020.

21  
22 **Q7. PLEASE HIGHLIGHT RECENT BILLING AND CUSTOMER SERVICE**  
23 **IMPROVEMENTS.**

24 A7. Since October 2019, the WRB has operated an e-billing website which has attracted over  
25 290,000 water customers. Through this website, customers can set up personalized,

1 automatic payments with a checking or savings account, enroll in paperless billing, make  
2 one-time payments with free eCheck, and make one-time payments with a credit or debit  
3 card (fees apply). Customers can also review and print up to 13 months of billing history  
4 and get email or text-message reminders about their bills and payments. In addition, the  
5 site includes links to report a water emergency or get assistance when a customer cannot  
6 pay their water bill. As of the end of November 2024, approximately fifty percent (50%)  
7 of the water customer base use the e-billing platform. Also, forty-six percent (46%) of the  
8 eligible customer base is now paperless – saving on bill printing resources. The WRB has  
9 engaged in targeted outreach to customers on the legacy auto-pay program called  
10 Zipcheck to convert them to the new auto-pay system.

11  
12 Another enhancement to the e-billing website includes water consumption details. The  
13 detailed information informs e-billing enrolled customers about their water consumption  
14 rates and trends in usage. As of Summer 2021, customers who are enrolled in e-billing  
15 services and have Advanced Metering Infrastructure (“AMI”) enabled water meters can  
16 also opt in to receive alerts in the event of water leaks and other changes in water  
17 consumption. Other recent enhancements include giving customers the option of paying  
18 bills via text (SMS), electing to view the website in Spanish and/or electing to receiving  
19 notifications in Spanish via email or text (SMS), and electing to receive reminder  
20 notifications when a payment is almost due or past due.

21  
22 **Q8. WHY IS THE PROPOSED RATE INCREASE RELEVANT TO WRB?**

23 A8. The WRB is committed to maintaining and improving all aspects of billing and collection  
24 for the PWD. Educating and offering customers all available assistance and payment  
25 options are, and will remain, a critical part of billing and collection.

The WRB's operations are funded entirely by revenue from the PWD. Funds from the proposed rates will support the WRB's staff and activities. Without rate relief, the PWD's ability to support the WRB would be limited. Cuts to funding for the WRB would make it harder for the WRB to maintain billing and accounting service levels, deliver timely and impactful customer service, and to administer customer assistance programs effectively.

### III. CUSTOMER ASSISTANCE PROGRAMS

**Q9. PLEASE IDENTIFY CUSTOMER ASSISTANCE PROGRAMS AVAILABLE TO PWD CUSTOMERS.**

A9. The WRB offers a variety of payment assistance through (i) standard payment agreements; (ii) extended payment agreements; (iii) TAP payment agreements; and (iv) the Water Revenue Assistance Program ("WRAP"). Each is briefly described below.

#### Standard Payment Agreements

Standard payment agreements are available to residential customers regardless of income. These agreements generally require an initial payment of twenty-five percent (25%) of the outstanding delinquency, followed by payment of the remainder in monthly installments over 18 months. Customer Service Supervisors can reduce the initial payment amount and extend the monthly installments up to 60 months if needed. The WRB had 2,013 active standard payment agreements at the end of FY 2024, and 1,389 active standard payment agreements created in FY 2025 as of November 30, 2024.

1       Extended Payment Agreements

2       Extended payment agreements are available to customers with household incomes  
3       between 151% and 250% of the Federal Poverty Level (“FPL”) who do not otherwise  
4       qualify for TAP. These agreements may have payout terms longer than 18 months if the  
5       WRB determines an extended payout term is necessary to keep the average monthly total  
6       bill for current usage, service, stormwater charges, and payment of arrears at or below  
7       approximately 4% of the customer’s monthly household income. The WRB had 372  
8       active extended payment agreements at the end of FY 2024 and 137 active extended  
9       payment agreements created in FY 2025 as of November 30, 2024.

10  
11       TAP Payment Agreements

12       TAP payment agreements are available to customers enrolled in TAP who have  
13       delinquent TAP bills. The WRB had 18 TAP payment agreements as of the end of FY  
14       2024 and 19 TAP payments agreements in FY 2025 as of November 30, 2024.

15  
16       WRAP

17       WRAP is a legacy customer assistance program offered by the WRB. Prior to July 1,  
18       2017, WRAP agreements were offered to delinquent customers whose annual household  
19       income was 250% or less of the FPL. The WRB stopped accepting requests for new  
20       WRAP applications on June 30, 2017. Existing WRAP participants are eligible to remain  
21       in the program if they remain income eligible and timely recertify. There were 4 active  
22       WRAP agreements as of the end of FY 2024, and 4 active WRAP agreements in FY 2025  
23       as of November 30, 2024.



**Q10. PLEASE IDENTIFY ANY RATE BASED CUSTOMER ASSISTANCE  
PROGRAMS ADMINISTERED BY THE WRB.**

A10. In addition to the foregoing, the WRB assists PWD customers through the following rate-based programs: TAP and the Senior Citizen Discount. These programs are briefly discussed below.

TAP

TAP was launched on July 1, 2017 and assists low-income households at or below 150% of the FPL and those with a special hardship (e.g., losing a job). Under the program, monthly water, sewer, and stormwater bills are tied to household income. Payments range from 2% to 4% of monthly household income.

TAP customers also receive forgiveness of arrears accumulated by the customer prior to entering the program, known as pre-TAP arrears. At the start of the program in July 2017, customers were eligible for forgiveness of the penalty amounts accrued on their pre-TAP arrears after completing 24 full TAP Bill payments. As of September 1, 2020, TAP customers became eligible for forgiveness of their pre-TAP arrears (principal amount) after completing 24 full TAP Bill payments. As of July 1, 2022, TAP customers receive ratable forgiveness of their pre-TAP arrears with each full payment of their monthly TAP Bill. Currently, TAP customers with pre-TAP arrears earn a credit of 1/24th of their pre-TAP arrears applied to their account each month that a full TAP Bill payment is made. Penalties associated with the pre-TAP arrears amount will continue to be forgiven in full after 24 full TAP Bill payments.

Information on TAP can also be found in Revenue's Annual Reports to the Mayor, which

are posted at: <https://www.phila.gov/departments/departments-of-revenue/reports/>.

### Senior Citizen Discount

The Senior Citizen Discount program is available to customers 65 years old or older with a household income not exceeding \$38,800 per year with the implementation of the FY 2023 rates. See PWD Statement 7 (Schedule BV-4:WP-6) for the updated senior citizen discount threshold. Customers in this program receive a 25% discount on their bill applied to usage, service, and stormwater charges.

## **Q11. PLEASE DESCRIBE AVAILABLE CUSTOMER ASSISTANCE GRANTS DISTRIBUTED BY THE WRB.**

A11. The WRB assists PWD customers through the distribution of grants from several sources. Those sources are briefly discussed below.

### Utility Emergency Services Fund

The Utility Emergency Services Fund (“UESF”) is a not-for-profit, tax-exempt, charitable organization.<sup>1</sup> UESF provides financial assistance to low-income individuals and families who are at risk of or who experienced utility terminations. The Department matches each dollar of financial assistance provided by UESF in the form of a matching bill credit on customers’ water accounts.

UESF’s Utility Grant program is administered by the USEF, not the WRB. The program is designed to bring a customer’s delinquent account up to date. The UESF’s financial assistance, the matching water bill credit, and any contribution by the individual should

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<sup>1</sup> See <https://uesfacts.org/>, <https://uesfacts.org/>, and <https://uesfacts.org/our-programs/utility-grant-program/>.

1 zero out the water bill. The projected matching grants by the Department during the Rate  
2 Period are discussed in detail in PWD Statement7.

3  
4 The Pennsylvania Housing Assistance Fund

5 The Pennsylvania Housing Assistance Fund (“PAHAF”), which is a housing-related  
6 program funded by the U.S. Department of the Treasury to assist Pennsylvania  
7 homeowners facing financial hardship due to the COVID-19 pandemic, closed  
8 applications in 2024, however water customers continue to receive grants while PAHAF  
9 works through its remaining applications. As of the end of FY 2024, 657 customers  
10 received grants totaling \$1,252,445.93. In FY 2025, as of November 30, 2024, 243  
11 customers have received grants totaling \$497,799.77.

12  
13 Low-Income Household Water Assistance Program

14 The Low-Income Household Water Assistance Program (“LIHWAP”) was a federal  
15 program for low-income families with overdue water bills.<sup>2</sup> The program was  
16 administered by the Commonwealth’s Department of Human Services and provided  
17 grants for past due water debt. LIHWAP ended and the WRB received its last grants on  
18 September 30, 2024. Mayor Cherelle L. Parker is supporting the proposed federal  
19 legislation currently pending before the Senate that would establish the LIHWAP as a  
20 permanent program.

21  
22 Philadelphia Housing Development Corporation and Debt Collective

23 The Philadelphia Housing Development Corporation (“PHDC”) administered federal  
24 COVID relief dollars to provide emergency rental assistance for renters and landlords.

25  

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<sup>2</sup> See <https://www.dhs.pa.gov/Services/Assistance/Pages/LIHWAP.aspx> .

This assistance program ended in 2023. Similarly, grants from the Debt Collective, a nonprofit group focused on tenant advocacy and assistance, were exhausted by the end of FY 2024. In FY 2024, 15 water customers received grants totaling \$2,744.96.

**Q12. PLEASE DESCRIBE ANY CHANGES IN CUSTOMER ASSISTANCE FUNDING SINCE THE 2023 RATE CASE.**

A12. Coming out of the pandemic years, the WRB and the PWD have seen the end of several programs that provided customer assistance funding since the last General Rate Case as described above. Funding for LIHWAP grants, PHDC Rental Assistance, and Debt Collective grants all ended in 2024. Additionally, UESF Grants have significantly decreased since the last General Rate Case. The ending or drastic reduction of these programs in recent years eliminated many assistance options for water customers struggling to pay their water bills. As a result, vulnerable customers have lost access to grants totaling \$5,395,903.09 from FY 2023 to FY 2024. Noting the diminished amounts received so far in FY 2025, the rate relief requested in this case would help to address the financial strain caused by the end of these programs.

Grant Totals	FY22		FY23		FY24		FY25 (as of 11/30/24)	
Grant	Count	Amount	Count	Amount	Count	Amount	Count	Amount
LIHWAP	3,980	\$6,690,186.28	3,699	\$7,017,850.35	1,026	\$1,952,437.64	N/A	N/A
Debt Collective	22	\$17,073.83	128	\$92,413.86	15	\$2,744.96	N/A	N/A
PAHAF	0	\$0.00	566	\$986,543.22	657	\$1,252,445.93	243	\$497,799.77
UESF	381	\$392,941.51	104	\$71,076.27	31	\$23,160.56	46	\$19,235.29
PHDC	2,471	\$1,507,399.65	719	\$458,808.48	N/A	N/A	N/A	N/A
<b>TOTAL</b>	<b>6,854</b>	<b>\$8,607,601.27</b>	<b>5,216</b>	<b>\$8,626,692.18</b>	<b>1,729</b>	<b>\$3,230,789.09</b>	<b>289</b>	<b>\$817,035.06</b>

**Q13. PLEASE STATE HOW MANY PWD CUSTOMERS PARTICIPATE IN TAP AND RECEIVE THE SENIOR CITIZEN DISCOUNT.**

A13. In FY 2024, there were 42,409 TAP enrollees. WRB enrolled 3,039 new TAP customers in FY 2025 as of November 30, 2024. Of those, 2,319 were enrolled in TAP for the first time. In FY 2024, 22,716 customers received the Senior Citizen Discount and in FY 2025, as of November 30, 2024, 22,526 customers received the Senior Citizen Discount.

#### **IV. BILLING/COLLECTION ACTIVITIES**

**Q14. PLEASE DESCRIBE CURRENT WRB COLLECTION ACTIVITIES.**

A14. Some of the WRB's notable current collection activities include new levels of customer engagement, systematic improvements, and revamped enforcement tools.

##### Customer Engagement

The WRB has focused on an ongoing call campaign that began in April 2024 to address breached payment agreements. Since the campaign began, 6,413 calls were placed that resulted in 2,826 customers entering new agreements to cure their delinquent debt.

##### Process Improvements

The WRB improved several internal processes to enhance its returned mail operations. Historically, when the WRB received returned mail, the account was researched for a better mailing address and a field investigation was conducted to obtain additional property information. After three months of returned mail from the same account, it was placed in "No Print" status in the WRB's customer information system, preventing water bills from being sent. However, there was no standard procedure for removing an account

1 from “No Print” status. As a result, some accounts remained in “No Print” status for  
2 longer than necessary. To alleviate a lack of oversight of these accounts, a new workflow  
3 was developed to direct PWD and WRB staff to timely remove the “No Print” status  
4 when new information confirmed an updated mailing address for the customer. This  
5 improved process requires staff at all levels to prioritize the alignment of new address  
6 information with the immediate removal of “No Print” status on an account. The  
7 improved workflow includes newly instituted quality control review on a quarterly basis.  
8 Since the project began in June 2024 and through November 30, 2024, “No Print” status  
9 has been removed from about 400 accounts with a combined debt of approximately  
10 \$1,634,540 to now allow for regular billing to those customers.

11  
12 Intent to Sheriff Sale and Sheriff Sale Proceedings

13 The Law Department worked with the WRB to revive programs that were suspended  
14 during the pandemic in addition to creating new enforcement methods. One of these  
15 programs includes letters sent from the Law Department to inform owners of  
16 commercial, stormwater-only accounts, or verified vacant properties that the City intends  
17 to Sheriff Sale the property due to unpaid water liens. In FY 2024, the City collected  
18 \$479,450 through this program. As of November 30, 2024, the City has collected  
19 \$503,197 so far in FY 2025. Secondly, the Law Department has renewed its Sheriff Sale  
20 proceedings against properties that have accrued only water debt, that are commercial,  
21 stormwater-only accounts, or verified vacant properties.

22  
23 Sequestration

24 The Sequestration program continued with its great success since the program’s inception  
25 in March 2019. Sequestration is an action filed with the Court of Common Pleas, where

1 the City requests a court-appointed sequestrator to collect outstanding property tax and  
2 water debt due from landlord property owners. When approved by the court, the  
3 sequestrator collects rents and pays off the property debts to the City until they are  
4 satisfied. These accounts are removed from the shutoff enforcement path, so there is less  
5 of a direct impact on the tenants. The first stage of the program involves notifying the  
6 landlord of the City's intent to file a petition. The City is able to reach settlements on  
7 about half of the petitions filed at this early stage in the litigation. The remainder of the  
8 accounts continue through the court process, and many continue to settle prior to the final  
9 stage of the court appointing the sequestrator. In FY 2024, the City collected \$9,286,973  
10 through this program. In FY 2025, as of November 30, 2024, the City has collected  
11 \$4,757,469.

### 12 13 Consolidated Complaints

14 The consolidated complaint program began as a cross-departmental project that involved  
15 the Department of Revenue and the Department of Licenses & Inspections ("L&I") to  
16 identify multi-property owners who owe various debts to the City, usually including real  
17 estate taxes, water debt, and L&I liens. The City files lawsuits against the property  
18 owners in the Court of Common Pleas to seek personal judgments that attach to all  
19 properties owned by the defendant. Since the program's inception in March 2019, the  
20 City has collected approximately \$1,000,000 in water debt. Additionally, in 2024, the  
21 City began concentrating efforts on defendants who own multiple properties and only  
22 owe water debt. In previous years, the program required multiple other areas of debt  
23 (such as real estate taxes and L&I liens) to be eligible. Since this new iteration of the  
24 program began in 2024, as of November 30, 2024, the City has collected \$901,197 in  
25 water debt.

**Q15. PLEASE DESCRIBE ANY CHANGES IN COLLECTION POLICIES SINCE THE  
2023 GENERAL RATE CASE.**

A15. In 2023, WRB modified its collection policy with respect to residential customers by altering its use of outside collection agencies to engage customers prior to the account becoming eligible for water service termination for failure to pay water bills. In previous years, after 90 days with debt accrued over \$1,000, the water customer became eligible to receive shut-off notices and eventually have their water service terminated for nonpayment. The customer was referred to an outside collection agency only after the water service was terminated.

However, the City's new policy sends the delinquent customers to an outside collection agency first in order to attempt to collect the water debt for a period of 120 days. If the customer does not come into compliance, they may be referred to a second outside collection agency for another 120-day period. After this second collection agency referral, if the customer still does not pay or enter into a payment agreement, and their debt has reached at least \$1,000, then they will begin to receive notices with a date for service termination. If the customer's debt is below that threshold, their account will be cycled back through the first and possibly second outside collection agency referral period, for a total of over 500 days for the customer to comply with an outside collection agency before entering the shutoff process (if and when their debt reaches the \$1,000 threshold). This change gives customers significantly more time to come into compliance through payment or by entering into an agreement to avoid service termination.



1 In November 2023, WRB began another initiative where TAP customers with unpaid  
2 TAP Debt of over \$250 were sent to outside collection agencies. These customers are still  
3 protected from service termination. When a customer responds to the agency, they are  
4 then referred to the WRB internal collections division to establish a TAPBACK payment  
5 agreement for the unpaid TAP debt if they are unable to resolve the debt in a lump sum.  
6 A TAPBACK agreement divides the total unpaid TAP balance amount into 12 months  
7 and makes it payable monthly with the current TAP bill charge. TAP customers with  
8 forgivable pre-TAP arrears (principal debt) will remain eligible to receive monthly  
9 forgiveness credits if they make full payments of the current and TAPBACK agreement  
10 charges monthly. Additionally, these customers remain eligible to receive penalty  
11 forgiveness when they have successfully completed the 12-month TAPBACK agreement  
12 along with current TAP charges for 24 months. If the TAP customer pays the outside  
13 collection agency directly, they will be equally eligible to receive forgiveness of their  
14 pre-TAP arrears and/or penalty amounts.

15  
16 **Q16. PLEASE DESCRIBE WRB'S PLANS TO REPLACE THE CURRENT BILLING**  
17 **SYSTEM.**

18 A16. The current billing system known as Basis2 utilizes outdated legacy technology and the  
19 vendor has not updated its core functions to respond to user needs. There are many  
20 reasons the outdated system needs to be replaced to better serve the City and customer  
21 base. Basis2 currently runs on Oracle Forms, a dated technology created in the 1980s.  
22 There is limited functionality, sometimes requiring Contact Center Representatives to  
23 sign into more than five different applications to serve a customer. The current system  
24 does not have the ability to leverage data for accessible reporting, such as heat maps.  
25

1 Finally, any business process changes require resource intensive code changes with  
2 lengthy turnaround times.

3  
4 To improve all of these areas requires a system replacement. Since June 2024, WRB has  
5 been working with a vendor to create a Request for Proposal by documenting current  
6 business processes, gaps in current systems, and requests for future functional and  
7 technical requirements for a modern solution. WRB plans to release a Request for  
8 Proposal by the end of FY 2025, with the goal of choosing a vendor by the end of the  
9 2025 calendar year. WRB will use a phased approach to deploy the new solution, while  
10 maintaining Basis2 to avoid disruption to its operations.

11  
12 **V. TAP IMPROVEMENTS**

13  
14 **Q17. DESCRIBE RECENT CHANGES MADE BY WRB/PWD TO IMPROVE TAP.**

15 A17. TAP enrolled its first customers seven years ago on July 1, 2017. Several significant  
16 improvements have been made in the recent past to ensure the long-term success of TAP  
17 as it matures.

18  
19 WRB simplified the application process for TAP customers in 2023 by amending Section  
20 206.2 of the PWD/WRB Joint Regulations.<sup>3</sup> The first change allowed TAP applicants to  
21 only provide one proof of income and residency dated within the last tax year or last 12  
22 months. Previously, applicants had to provide two proofs of residency dated within the  
23 past six months. Moreover, now if the income documentation also reflects the property  
24 address, no other documentation is required.

25 <sup>3</sup> The changes to the application were codified by amendments to PWD/WRB Joint Regulations Section 206.2 in 2024.

1  
2 Furthermore, Section 206.2 (g) amended the list of acceptable documents for proof of  
3 residency to include internet bills, cell phone bills, and LIHWAP award letters. These  
4 changes were welcomed by the public and WRB staff tasked with processing  
5 applications, leading to more immediate approvals, fewer application denials for  
6 incomplete or missing documents, and reduction of administrative burden on customers.

7  
8 Another improvement to TAP was changing the recertification timeline from three years  
9 to four years. This internal practice allowed TAP customers more time, coming out of the  
10 financial strains of the pandemic, to remain on TAP and take advantage of the most  
11 important benefits and protections including capped bills, debt forgiveness, exclusion  
12 from termination of service for TAP water debt, and free water conservation services.

13  
14 Finally, the most impactful change to TAP since the last Rate Case was the design and  
15 execution of the WRB's data-sharing and autoenrollment of customers from the  
16 Commonwealth's LIHWAP program and the City's own Office of Integrated Data for  
17 Evidence and Action ("IDEA"). Revenue entered into an agreement with the  
18 Commonwealth's Department of Human Services in 2022 allowing the WRB to  
19 prequalify water customers for TAP based on their receipt of LIHWAP grants which  
20 required similar eligibility. Since February 2023, 3,281 customers were enrolled in TAP  
21 using data from the LIHWAP program.

22  
23 As a second phase, the WRB worked with IDEA to prequalify customers who had  
24 participated in other assistance programs with similar eligibility requirements as TAP. All  
25 IDEA enrollees were considered eligible on the basis of income and no additional

1 residency verification is needed for these enrollees. Pre-qualification of IDEA candidates  
2 began on February 13, 2024, and as of November 30, 2024, **37,536** prequalified  
3 customers were enrolled in TAP, helping to more than double the total number of TAP  
4 participants.

5  
6 **VI. OTHER IMPROVEMENTS**

7  
8 **Q18. WHAT CHANGES ARE PLANNED FOR THE ADMINISTRATION OF THE**  
9 **CHARITY RATE?**

10 A18. PWD and the WRB plan to improve efficiency of administration of the charity discount  
11 program for both the customer and the City by creating clear eligibility and application  
12 requirements in new PWD/WRB joint Regulations. All other bill discount programs  
13 related to water usage fall under these Regulations, and therefore PWD and the WRB will  
14 conform the charity discount program in the same way. There will be no change in the  
15 substantive content of qualification nor the rate of the discount, which remains in Rate  
16 and Charges under the authority of the Water, Sewer and Stormwater Rate Board. To  
17 align with other water collection activities, the administration of this program will move  
18 from PWD to the WRB as proscribed in the new Regulations. Please see draft  
19 PWD/WRB joint Regulations to be filed with the Department of Records alongside this  
20 matter.

21  
22 **VII. CONCLUSION**

23  
24 **Q19. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

25 A19. Yes, it does.

# Susan M. Crosby, Esq.

## Relevant Experience

### **Deputy Revenue Commissioner for Water (WRB) Philadelphia, PA 2020-current** **City of Philadelphia Department of Revenue**

- Oversee an operating budget of \$15.8 million.
- Responsible for 221 budgeted positions that consist of the following Divisions: Accounting, Adjudications, Collections, Customer Assistance Programs, Customer Operations, and Technical Operations.
- Responsible for the monthly generation and collection of Water/Sewer bills for approximately 500,000 customers.
- Responsible for collection and program administration reporting to the Water and Finance Departments on an ad hoc, monthly, and quarterly basis.
- Serves on the Revenue Commissioner's Executive Team which is responsible for supporting the mission of the Revenue Department and for the development and implementation the strategic plan for the Revenue Department.

### **Divisional Deputy City Solicitor, City of Philadelphia Law Department Philadelphia, PA 2014-2020**

- Represented the City and School District of Philadelphia in tax matters before the Tax Review Board, the Court of Common Pleas, the Commonwealth Court, and the Supreme Court of Pennsylvania.
- Maintained limited litigation caseload including administrative hearings, trials, and appeals where delinquencies exceed \$100,000.
- Managed over 20 exempt and civil service staff, fostered a collaborative work environment to encourage staff to assist each other with their caseloads, redeployed staff as necessary to encourage personal growth and align personnel strengths with the goals and requirements of the work groups.
- Managed 3 junior, direct report attorneys with responsibility for litigation training, skill development, case assignment, and individual mentoring.
- Represented the Law Department and Water Revenue Bureau (WRB) in the development and implantation of the Tiered Assistance Program, including developing business requirements, standard operating procedures, IT solutions, drafting and managing the RFP for application processing, and providing legal counsel to all team members.
- Represented WRB in water rate setting proceedings, including drafting regulatory filings, responding to participant information requests, conducting direct and cross examination of experts, and engaging the customer base in public hearings.
- Developed an USTRA working group with monthly coordination meetings, resulting in increased collection of referred delinquent water debt. Stakeholders from WRB, Water Department, OIT, and outside counsel discuss shutoff notices, programming needs, payment plans, and workflow changes.

### **Deputy City Solicitor, City of Philadelphia Law Department Philadelphia, PA 2013-2014**

- Represented the City and School District of Philadelphia in tax matters before the Tax Review Board, the Court of Common Pleas, and the Commonwealth Court.
- Maintained extensive litigation caseload including administrative hearings, trials, and appeals.
- Managed several special on-going projects including project to write-off uncollectible delinquencies, Real Estate dunning program, and Department of Revenue subpoena responses.
- Increased collections by 60% to bring in \$2.4 million for the City and School District.
- Mentored other attorneys in the practice group.

### **Assistant City Solicitor, City of Philadelphia Law Department Philadelphia, PA 2012-2013**

- Represented the City and School District of Philadelphia in tax matters before the Tax Review Board and the Court of Common Pleas.
- Leveraged litigation experience to collect \$1.2 million in delinquent taxes during the first year with the Law Department.
- Quickly learned the applicable ordinances, regulations, and binding case law that form the body of local Philadelphia tax law.

## Relevant Experience (Continued)

**Assistant State Attorney, State Attorney's Office, Sixth Judicial Circuit**      Clearwater, FL      2001-2008

- Participated in specialized practice divisions including Traffic, Domestic Violence, and Drug Court.
- Broad courtroom experience with over thirty jury trials and extensive motion practice.
- Supervised up to five other attorneys as a Lead Trial Attorney, including delegating courtroom calendar assignments, assisting with trial preparation, and managing the pending caseload for the division.
- Developed reporting metrics to track outcomes and to plan for future assignments.

## Education

**Stetson University College of Law**      St. Petersburg, FL      Juris Doctor 2001

- Editor-In-Chief of the Stetson Law Forum (Fall 1999-Fall 2001)
- Letters of Commendation: Environmental Law, Complex Litigation
- Honors: Dean's List, Honor Roll, and William F. Blews Pro Bono Service Award

**Florida State University**      Tallahassee, FL      Bachelor of Science 1998

- Double Major in History and Political Science
- Florida Bright Futures Scholarship Recipient
- Phi Sigma Pi National Honor Fraternity
- Sigma Sigma Sigma Panhellenic Sorority

## Publications

**Journal of the American Water Resources Association**      March 2020

Technical Paper: An Experiment in Making Water Affordable: Philadelphia's Tiered Assistance Program (TAP) by Elizabeth A. Mack, Sarah Wrase, Joanne Dahme, Susan M. Crosby, Martha Davis, Melody Wright, Ravonne Muhammad. Paper No. JAWRA-19-0024-P of the Journal of the American Water Resources Association (JAWRA). First published: 16 March 2020, <https://doi.org/10.1111/1752-1688.12830>

- This article presents and assesses customer and revenue impacts of a groundbreaking income-based billing solution to the challenge of water services affordability in Philadelphia, Pennsylvania.
- Winner of the 2021 William R. Boggess Award for best paper published in the Journal of the American Water Resources Association during the previous year.

## Affiliations

- Commissioner and Secretary, Mayor's Commission on Women
- Water Utility Leaders Fellow, Center for Water Security and Cooperation (Washington, D.C.)
- Girl Scouts of Eastern Pennsylvania Service Unit and Troop Leader
- Admitted to practice in Pennsylvania and Florida (inactive)

## **204.0 CHARITY WATER RATES AND CHARGES PROGRAM**

### **204.1 Purpose:**

The City of Philadelphia has determined that public and private schools, institutions of purely public charity, and places used for actual religious worship should be afforded a discounted rate for water and sewer rents if the institution meets the criteria as set forth in this Section. Under the Philadelphia Code section 13-101(4)(e), the Philadelphia Water Department is charged with promulgating regulations that define such a program, and subsequently administering it. An approved applicant will receive the discount pursuant to these Regulations.

### **204.2 Eligibility:**

A water/sewer service customer may apply to the WRB for enrollment into the Charity Water Rates and Charges Program (the “Program”). To be eligible for the Program, all of the following conditions must be met:

- (a) Applicant is a public or private school, a place used for actual religious worship, or meets all the requirements of a purely public charity as defined by the Institutions of Purely Public Charity Act, 10 P. S. section 371, et seq., (the “Act”).
- (b) Applicant is either the owner of the property or a tenant of the property. In the event the applicant does not occupy the entire property, the area occupied by the applicant must have a dedicated supply line and meter with a corresponding water/sewer account with the WRB.

(c) The property’s principal use is devoted to the advancement of the applicant’s stated charitable purpose.

(d) Applicant is in compliance with City Code section 17-1303.

(e) Applicant is in compliance with City Code section 17-107(12).

(f) Applicant is in compliance with all other Philadelphia Water Department Regulations.

(g) Applicant does not have any outstanding Department or Plumbing Code violations.

(h) If the applicant’s property has water and sewer service, the property must have an operating water meter that is in compliance with current Water Department specifications, and the property must have a current water meter reading.

### **204.3 Discount:**

Subject to approval of a complete application by the WRB as set forth in Section 204.4, an applicant meeting the criteria in Section 204.2 shall be afforded a discounted rate on usage charges as prescribed in the Water Rates and Charges and the Philadelphia Code.

### **204.4 Application Process:**

(a) An application for the discount shall be made on a form provided by the Water Revenue Bureau. A complete application includes all of the following:

- (1) Proof of eligibility by submitting:

(A) Documentation of valid registration with the Commonwealth as a purely public charity as defined in the Act, or

(B) Documentation that the applicant otherwise meets the requirements under the section 204.2, including but not limited to:

(i) State or federal tax documentation indicating charitable status;

(ii) Corporate formation documents; or

(iii) Certification of charitable status by another state; or

(iv) Proof of establishment as a public school within the City of Philadelphia; or

(v) Proof of registration or licensure as a nonpublic or private school from the Commonwealth; or

(vi) Proof that the applicant's property is primarily used for actual religious worship.

(2) Proof of compliance with City Code section 17-1303.

(3) An attestation by the applicant to 204.2(b) and (g).

(b) An application shall be signed by an officer or authorized agent of the applicant.

(c) The City may inspect any parcel seeking a discount under this Regulation at any time in order to ascertain whether it meets the criteria set forth in City Code sections 17-

1303 and 17-102(12), the Act, and this Regulation.

#### **204.5 Renewal:**

A discount provided under 204.3 shall expire after 2 years and may be renewed upon submittal of a complete Renewal Application.

#### **204.6 Removal from Program:**

(a) A customer enrolled in the Program may request to be removed from the Program at any time.

(b) The WRB may remove customers from the Program and revoke the discount if:

(1) The customer fails to comply with City Code sections 17-1303 and 17-107(12), the Act, or this Regulation; or

(2) The property ceases to be used for the stated charitable purpose by the applicant; or

(3) The property ceases to be owned or occupied by the applicant; or

(4) It is discovered that the customer submitted intentionally false enrollment or recertification information/documentation.

(b) Removal from the Program and revocation of the discount shall remain in effect for a minimum of twelve (12) months from the date of revocation.

#### **204.7 Effective Date of Discount:**

A discount provided under this Section shall be effective the date the complete application is received.



**204.8 Exclusions:**

The discount as prescribed by Rates and Charges shall exclude service to any separate or adjoining facilities or structures not used exclusively for the principal purpose of the applicant.

**204.9 Hearing:**


Organizations that have been denied eligibility or have had their discount revoked may request an informal hearing pursuant to Philadelphia Water Department Rates and Charges.




# LAKISHA GAYMON-FOREMAN

## PROGRAM MANAGEMENT SPECIALIST

### CONTACT

 215-686-2721

 Lakisha.Gaymon-  
Foreman@phila.gov

1401 JFK BLVD, Suite 200  
Philadelphia PA 19101

### PROFILE

Conscientious and hard-working professional with a broad track record of success working in a supervisory and administrative capacity. Highly motivated and successful manager with a proven track record of producing accurate reports, data entry, analysis, and quality assurance. Extensive experience building and managing high-performance teams in a fast-paced environment, through guidance, training, coaching, and employee development using proven strategies to motivate and achieve business objectives. Demonstrated leader with passion, drive, positive attitude and a committed to finding innovative solutions for job efficiency, customer satisfaction to a dynamic firm.

### AREAS OF EXPERTISE

- Customer Service
- Typing and Data Entry
- Timekeeping
- Operating Systems and Software Testing
- Medical Billing and Coding
- Database and Records Management
- Quality Control
- Training

### EXPERIENCE

#### Administrator

City of Philadelphia, Revenue Department  
July 2022 to Present

Launch the new Tiered Assistance Program (TAP) for low-income eligible water, sewer customers. Serve as a lead in developing and implementing a process to enroll all eligible customers into Water Assistance programs including outreach, building partnerships, designing, and refining processes to encourage enrollment. Incorporating more uniformity in processing to ensure accuracy and timely processing of applications, verification of documentation, and other program materials. Updating program processes and materials based on legislative changes to improve operations and ease customer's barriers to accessing assistance programs. Conducting or arranging for appropriate training for community partners, government stakeholders as well as the public. Communicating with the Deputy Commissioner and Director of Operations, along with internal staff and external partners regarding any operational, personnel, and administrative issues. Assuring program compliance with all relevant laws and regulations. Cultivating positive relationships with vendors and

## SKILLS

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- Type 60 words per minute.
- Highly Adaptive to new situations.
- Excel at incorporating new processes into existing job functions.
- Managing multiple priorities while maintaining a high degree of accuracy and quality work.
- Possesses strong leadership skills with an ability to build trust and loyalty within the team dynamic.
- Proficient in Microsoft Office products, and database management systems.

## EDUCATION

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### Associate in Health Information Technology

Peirce College - Philadelphia, PA  
June 2022

### Medical Billing and Coding

Ultimate Medical Academy (Online) - Tampa, FL  
May 2013

### High School Diploma

Simon Gratz High School – Philadelphia PA  
June 1996  
Business Administration

Schedule LGF-1

fulfilling reporting obligations. Manage and direct 36 full-time staff, conduct performance appraisals, arrange for appropriate training for staff development, and participates in appropriate training programs to enhance own professional and personal development.

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### Clerical Supervisor II

City of Philadelphia, Revenue Department  
May 2017 to June 2022

Provide technical and administrative support to the Administrator of the Water Revenue Customer Assistance Program. Complete reporting, data entry, review, edit, analysis, and quality assurance of the Water Customer Assistance Program Database. Assisting Database developers in developing and monitoring a comprehensive quality assurance program to assure an acceptable level of quality of the data reported in the Customer Assistance Program Database. Review Tax Review Board hearing complaints and investigate claims to determine if additional documentation could be requested to process a customer assistance application. Attend hearings to review complainant additional documentation for completeness and advise if complaint should be withdrawn, delayed, or closed in accordance with policies and procedures. Process timekeeping for myself and staff in the human resources OnePhilly database and submit electronic timesheets and leave slips to human resources department.

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### Service Representative

City of Philadelphia, Revenue Department - Philadelphia, PA  
August 2015 to May 2017

Completed work using telephone headset and computer equipment handling inbound calls daily. Aided and information to customers with regards to water account billing and usage history. Advised customers of water revenue assistance program options and helped customers complete the assistance applications. Explained decisions and reasons for the decisions made by water revenue, calculated and set up payment agreements, advised customers of their right to appeal and the appeals process. Communicated information both orally and in writing with other units to resolve customer billing issues.

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### Program Specialist/ Curriculum Coordinator

Temple University - Philadelphia, PA  
August 2007 to August 2015

Developed and monitored a comprehensive quality assurance program to assure an acceptable level of quality of the data reported in the Blackboard and LCMS educational databases. Worked closely with IT to manage computer applications and served on the administrative board to provide input on database enhancements. Assisted faculty course directors with the coordination of the 2nd year medical curriculum by preparing schedules, exams, organize workshops, maintained student web

sites, upload documents, and proctored exams. Maintained and monitored student attendance for workshops and examinations. Performed clerical/administrative functions such as: typing, faxing, sorting, and filing documents. Worked with facilities management and other departments to resolve room scheduling conflicts and room configuration issues. Assisted Student Records Office with entering course inventory, instructors, and student grades.

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### Secretary III

Temple University - Philadelphia, PA

January 2005 to July 2007

Assisted course directors with the medical, dental and podiatry course curriculum including: Course handouts, quizzes, distributing and proctoring exams, and managing student Web sites. Received telephone calls and greeted visitors, give routine and non-routine information, answered questions and direct calls and visitors to the appropriate person or office. Assisted in the preparation of travel arrangements for the department faculty including transportation and hotel reservations, notifying offices to be visited, and gathering any materials needed. Prepared and type a variety of correspondence, reports, forms, requisitions.

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### Patient Service Representative

University of Pennsylvania Hospital - Philadelphia, PA

August 2003 to January 2005

Provided patient care by scheduling appointments and collecting co-pays. Prepared patient charts and called testing laboratory and radiology department. Checked patients in/out and used hospital software systems to locate patient test results.