

**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 2024 – 2025 Rates and Charges to Become Effective September 1, 2023 and September 1, 2024
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**PUBLIC ADVOCATES DISCOVERY REQUESTS
&
REQUESTS FOR PRODUCTION OF DOCUMENTS**

SET I

For purposes of the following requests, “PWD” means and includes the Philadelphia Water Department, the Water Revenue Bureau, and any person, agency or corporation whom either of them has retained to provide the relevant customer service function.

For purposes of the following requests, Customer Assistance Program shall include the Tiered Assistance Program (TAP), the Senior Citizen Discount, payment arrangements and all programs WRB and/or PWD considers customers for pursuant to Philadelphia Code §19-1605(3)(c) (requiring the Department to determine whether a customer would receive more affordable bills under another available payment agreement or rate discount).

PA-I-1. In Excel format, by month for July 2018 through present, please provide the number of Customer Assistance Program (CAP) enrollees whose income information was accepted for enrollment in a Customer Assistance Program due to the automatic acceptance of income provisions of Philadelphia Code §19-1605(3)(i)(.2) (requiring acceptance of determinations of income and residency).

PA-I-2. In Excel format, by month for July 2018 through present, please provide the number of Customer Assistance Program enrollees whose residency information was accepted for enrollment in a Customer Assistance Program due to the automatic acceptance of residency provisions of Philadelphia Code §19-1605(3)(i)(.2) (requiring acceptance of determinations of income and residency).

PA-I-3. Please provide a copy of all written correspondence, including e-mails, letters, memos or other written document of any nature, between PWD and/or WRB and the municipal office that determines income-eligibility for the Philadelphia tax hardship program that proposes, considers, evaluates or otherwise discusses any collaboration

between the TAP and tax hardship assistance program with respect to determining income eligibility for the two programs.

PA-I-4. Please compare and contrast the income-eligibility requirements for the Philadelphia tax hardship assistance program codified at Philadelphia Code §19-1305 and TAP.

PA-I-5. In Excel format, by week, since July 1, 2018, provide the number of TAP participants who are:

- a. Homeowners
- b. Tenants
- c. Occupants

PA-I-6. Please provide a detailed description of all differences in TAP applications, or in the review or other treatment of TAP applications, based on whether the applicant is:

- a. A homeowner;
- b. A tenant;
- c. An occupant.

PA-I-7. In Excel format, disaggregated by homeowners, tenants, and occupants, by month for the months July 2018 to present, please provide:

- a. The number of Customer Assistance Program applicants (defining an “applicant” as a customer who is not currently a Customer Assistance Program participant at the time of application);
- b. The number of new TAP enrollees (defining a “new enrollee” as a customer not currently participating in TAP who begins participation in TAP);
- c. The number of new Senior Citizen Discount enrollees who are also on TAP;
- d. The number of new Senior Citizen Discount enrollees who are not on TAP;
- e. The number of Customer Assistance Program applicants who were placed in another payment agreement or rate discount, disaggregated by type of agreement or rate discount.
- f. The number of Customer Assistance Program applicants whose application was denied due to a failure to provide adequate proof of residence;
- g. The number of Customer Assistance Program applicants whose application was denied due to a failure to provide adequate proof of income;
- h. The number of Customer Assistance Program applicants who were denied for other reasons (specifying what those “other” reasons are);
- i. The number of new TAP enrollees by whether the new enrollee has a pre-existing arrears subject to arrearage forgiveness.

PA-I-8. In Excel format, please provide any budget document (or other written document of any nature) prepared in the period Fiscal Year 2018 to present:

- a. Projecting TAP participation by month;
- b. Presenting a side-by-side comparison of projected TAP participation versus actual TAP participation.
- c. Projecting Customer Assistance Program participation by month
- d. Presenting a side-by-side comparison of projected Customer Assistance Program participation versus actual Customer Assistance Program participation.

PA-I-9. Confirm or deny: The administrative costs associated with TAP are not subject to reconciliation through PWD's TAP Rider. If denied, please identify in the Rate Rider the specific location at which the reconciliation of administrative costs is identified and/or discussed.

PA-I-10. In Excel format, by year, for each Fiscal Year 2017 to present, please identify the specific dollar amount of administrative costs for Customer Assistance Programs budgeted, disaggregated by:

- a. Wages;
- b. Benefits;
- c. Overhead (indicating how overhead was calculated);
- d. Information technology;
- e. Contingency (indicating how the contingency was calculated);
- f. Other (identifying with specificity what the "other" is);
- g. The total of all administrative costs.

Please identify the percentage of the above referenced administrative costs budgeted for TAP, Senior Citizen Discount, Payment Agreements and Other Programs (please identify).

PA-I-11. In Excel format, please identify, by month since July 2017, the actual dollar amount of administrative costs expended on Customer Assistance Programs, disaggregated by:

- a. Wages;
- b. Benefits;
- c. Overhead (indicating how overhead was calculated);
- d. Information technology;
- e. Contingency (indicating how the contingency was calculated);
- f. Other (identifying with specificity what the "other" is);
- g. The total of all administrative costs.

Please identify the percentage of the above referenced administrative costs expended for TAP, Senior Citizen Discount, Payment Agreements and Other Programs (please identify).

PA-I-12. In Excel format, by year, for each Fiscal Year 2017 to present, please identify the specific dollar amount of Customer Assistance Program administrative costs currently being collected in PWD base rates, disaggregated by:

- a. Wages;
- b. Benefits;
- c. Overhead (indicating how overhead was calculated);
- d. Information technology;
- e. Contingency (indicating how the contingency was calculated);
- f. Other (identifying with specificity what the “other” is);
- g. The total of all administrative costs.

Please identify the percentage of the above referenced administrative costs expended for TAP, Senior Citizen Discount, Payment Agreements and Other Programs (please identify).

PA-I-13. In Excel format, by year, for each Fiscal Year 2017 to present, please identify the specific dollar amount of fees paid to each contracted third-party vendor and/or consultant regarding Customer Assistance Programs, disaggregated by vendor and/or consultant:

- a. Budgeted for the fiscal year;
- b. Expended during the fiscal year;
- c. Included in rates in the fiscal year.

PA-I-14. By year, for each Fiscal Year 2017 to present, please provide for each third party vendor and/or consultant paid more than \$100,000 in the fiscal year for purposes of working on TAP and/or Customer Assistance Programs more broadly:

- a. The scope of work agreed to with the consultant;
- b. The signed contract with the consultant;
- c. Each invoice to PWD for work relating to TAP and/or Customer Assistance Programs more broadly.

PA-I-15. In Excel format, please provide all payment pattern reports by month for July 2018 to present for all Customer Assistance Program participants, disaggregated by program.

PA-I-16. In Excel format, please provide all payment pattern reports by month for July 2018 to present for all residential customers not enrolled in a Customer Assistance Program.

PA-I-17. In preparing those payment pattern reports, please define the terms:

- a. Billings
- b. Payments
- c. Total percent collected

PA-I-18. In assessing collections for PWD, please:

- a. Define the term “receipts”
- b. Separately indicate how the distinction between “billings” and “receipts” is used in calculating rate levels.

PA-I-19. Please provide a copy of all agendas and all minutes of TAP Advisory Committee meetings from July 1, 2018 to present.

PA-I-20. Please provide a copy of all written presentations, memos or other written documents of any nature from PWD or WRB (including their consultants) provided to TAP Advisory Committee members at an Advisory Committee meeting from July 1, 2018 to present.

PA-I-21. Please provide a copy of all written presentations, memos or other written documents of any nature from PWD or WRB (including their consultants) provided to City Council, the Water Board, the Mayor’s Office, or any other Philadelphia municipal entity or official regarding TAP from July 2017 to present.

PA-I-22. Please provide a copy of all presentations by a PWD or WRB official or staff member (including Raftelis and/or Black and Veatch personnel) to a conference, seminar, or other public or industry gathering regarding TAP from July 2017 to present.

PA-I-23. Please provide a copy of all articles authored or co-authored by a PWD or WRB official, or by Raftelis and/or Black and Veatch personnel, published between July 2017 and the present in a:

- a. Peer reviewed journal published by an academic institution of higher learning;
- b. Peer reviewed journal published by a water industry association or industry entity;
- c. Peer reviewed journal published by an environmental, or environmental finance, association or other environmental or environmental finance entity;
- d. A peer-reviewed journal published by any other institution not identified above.

PA-I-24. Please provide a copy of all white papers, reports, or evaluations of the Philadelphia TAP authored or co-authored by a PWD or WRB official or staff member, or by Raftelis and/or Black and Veatch personnel, published by PWD, WRB, Raftelis or Black and Veatch from July 2017 to present.

PA-I-25. In Excel format, please provide a single copy, for the period July 1, 2018 to present, of the following:

- a. Each daily and weekly customer assistance application processing report;
- b. Each report providing monthly program participation statistics;
- c. Each report providing monthly program costs;
- d. Each periodic City Council-required report; and
- e. Each other ad hoc and periodic reports to support management of Customer Assistance Programs that has been requested and developed.

PA-I-26. In Excel format, please provide a single copy, for the period July 1, 2018 to present, of the following:

- a. Each report reporting the number of Customer Assistance Program and/or TAP applications requested, by method requested;
- b. Each report reporting the number of Customer Assistance Program and/or TAP applications submitted, by method submitted;
- c. Each report reporting the number of applications by status change;
- d. Each report reporting the number of customers by program enrolled;
- e. Each report reporting TAP participation levels;
- f. Each report reporting TAP discount amounts;
- g. Each report reporting the number of TAP bill payments;
- h. Each report reporting the dollars of TAP bill payments;
- i. Each report reporting the number of accounts with pre-existing arrears (with pre-existing being those arrears that were incurred prior to TAP enrollment) not yet forgiven;
- j. Each report reporting the dollars of pre-existing arrears not yet forgiven;
- k. Each report reporting the number of accounts with arrears forgiven in a particular time period;
- l. Each report reporting the dollars of arrears forgiven in a particular time period.

PA-I-27. Please provide in Excel format the number of TAP participants as of the end of the month by month for each month January 2018 to present.

PA-I-28. In Excel format, please provide the number of TAP exits, by reason for the exit, by month since July 2018 to present inclusive.

PA-I-29. In Excel format, please provide by year for the years 2018 to present inclusive:

- a. Average number of confirmed low-income customers.
- b. Average number of estimated low-income customers.

For purposes of this and other questions using this term, a “confirmed low-income customer” is a customer that PWD knows, or has reason to know, is a customer with income at or below 150% of the Federal Poverty Level.

PA-I-30. In Excel format, please provide all collectability studies prepared by or for PWD and/or WRB with data through December 2022.

PA-I-31. In Excel format, provide a list of each Census Block Group comprising, in whole or part, the PWD service territory.

PA-I-32. In Excel format, provide a list of each nine digit zip code comprising, in whole or part, the PWD service territory.

PA-I-33. In Excel format, for each nine digit zip code in PWD’s service territory, provide:

- a. The number of residential customers in that zip code;
- b. The number of confirmed low-income customers in that zip code; and
- c. The number of TAP participants served in that zip code.
- d. The number of participants in payment arrangements and/or rate discounts, disaggregated by type of program.

PA-I-34. In Excel format, for the most recent 12 month period available, please provide any information that is available that is broken down by Census Block Group, or if Census Block Group is not available, by nine digit zip code, regarding residential customers’:

- a. Amount of billed revenue (in dollars) for current service;
- b. Payments (in dollars);
- c. Arrears (in dollars);
- d. Number of bills rendered;
- e. Number of payments received;
- f. Number of accounts with payments made resulting in a \$0 balance after the payment;
- g. Number of accounts in arrears;
- h. Number of shutoff notices for nonpayment;
- i. Number of notices of defect issued;
- j. Number of terminations for nonpayment;
- k. Number of terminations for reasons other than nonpayment
- l. Number of reconnections.

If information is broken down by more than one geographic area, provide that information which is available on the most geographically disaggregated basis (e.g., Census Tract rather than zip code).

PA-I-35. In Excel format, please provide Department accounts receivable aging reports by month for the most recent 24 months available, including within each aging bucket: (a) the number of accounts; (b) the dollars of receivable; and (c) the average balance per account. Separately include the total receivables (in dollars) and the total numbers of accounts with receivables, for each month.

- a. Separately provide for non-residential accounts;
- b. Separately provide for residential accounts;
- c. Separately provided for TAP participant accounts.
- d. Separately provided for participant accounts in payment arrangements and/or rate discounts, disaggregated by type of program.

Please indicate whether the dollars and/or accounts in each aging bucket are additive (e.g., whether the total is equal to the sum of the various aging buckets used).

PA-I-36. In Excel format, please provide a usage distribution by month for the most recent 24 months available, including within each distribution range: (a) the number of accounts; (b) the aggregate consumption within that range; (c) the average consumption within that range; and (d) the average bill within that range.

- a. Separately provide for residential accounts;
- b. Separately provide for TAP participant accounts.
- c. Separately provided for participant accounts in non-TAP payment arrangements and/or rate discounts, disaggregated by type of program.

PA-I-37. In Excel format, please provide, by year for the most three years available, all collectability studies assessing the rate at which the Department converts billings into collected revenue.

- a. Separately provide for non-residential accounts;
- b. Separately provide for residential accounts;
- c. Separately provide for TAP participant accounts.

PA-I-38. Please identify each residential customer service fee imposed, including any late payment charge. Separately provide the cost-justification for such fee.

PA-I-39. In Excel format, for each residential customer fee identified in response to the immediately preceding question, please provide by month for the most recent 24 months

available: (a) the number of accounts being charged that fee; and (b) the aggregate dollars charged for that fee.

PA-I-40. In Excel format, please provide by month for the most recent 24 months available, the number of:

- a. Final notices of termination for nonpayment (disaggregating by and explaining if different “final” notices are provided) for residential customers;
- b. The average arrears for residential accounts receiving final notices of termination for nonpayment;
- c. Residential terminations for nonpayment;
- d. The average arrears for residential accounts terminated for nonpayment;
- e. Final notices of termination for nonpayment (disaggregating by and explaining if different “final” notices are provided) for non-residential customers (distinguishing between different types of “non-residential” customers if such distinctions are made);
- f. The average arrears of non-residential accounts receiving final notices of termination for nonpayment (distinguishing between different types of “non-residential customers if such distinctions are made);
- g. Non-residential terminations for nonpayment (distinguishing between different types of non-residential customers if such distinctions are made);
- h. The average arrears of non-residential accounts termination for nonpayment (distinguishing between different types of non-residential customers if such distinctions are made).

PA-I-41. In Excel format, of the residential accounts receiving a notice of an impending termination for nonpayment, for each month for the most recent 24 months available, please provide:

- (a) The total number of accounts that did not have their service terminated by the
- (b) date specified in the termination notice;
- (c) The total number of accounts that did not have their service terminated for nonpayment after receiving a termination notice for nonpayment that voluntarily terminated their accounts;
- (d) The total number of accounts that did not have their service terminated because the customer paid their bills in full prior to their scheduled termination;
- (e) The total number of accounts that did not have their service terminated because the customer paid their bills less than in full but sufficient to avoid their scheduled termination;
- (f) the total number of accounts that did not have their service terminated due to a medical hold being placed on the account

- (g) The total number of accounts that did not have their service terminated even though they retained an arrears that was sufficient large (or sufficiently old) to trigger a termination); and
- (h) The total number of accounts on which account no payments were made prior to the issuance of the next bill after issuance of the termination notice.
- (i) The total number of properties receiving a termination notice that subsequently requested a TAP application within the following 3 months
- (j) The total number of properties receiving a termination notice that subsequently submitted either a tenant application or occupant application, disaggregated by type of application and by whether service was actually terminated.

PA-I-42. Assume for purposes of this Information Request that a residential bill is rendered on Day 1. Assume further the bill remains unpaid. Provide the timeline of each collection step until the bill is final-billed for nonpayment. Identify the Day on which each step of the collection process can be expected to occur.

PA-I-43. In Excel format, for the most recent 24-month period available, by month for residential accounts, please provide:

- a. What percentage of bills was paid by the due date of the bill;
- b. What percentage of bills was paid by the time the next month's bill is rendered;
- c. What percentage of those bills was paid by the time the second subsequent bill is rendered; and
- d. What percentage of those bills was paid by the time the third subsequent bill is rendered.

PA-I-44. In a typical month, with Day 1 being the day a bill is issued, please provide the percentage of residential accounts making payments by day through Day 60. If reporting of such data is only by a time period other than a day (e.g., weekly), provide by the reporting by that time period.

PA-I-45. In Excel format, please provide by month for each month for the most recent 24 months available:

- a. The average bill for all residential accounts;
- b. The average arrears of residential accounts in arrears;
- c. The average bill of residential accounts in arrears;
- d. The total dollars of residential arrears;
- e. The percentage of residential dollars constituting arrears;
- f. The percentage of billed residential accounts having arrears; and

- g. The average arrears of all residential accounts terminated for nonpayment in that month.

PA-I-46. Please provide a copy of a typical residential notice of termination for nonpayment printed in each of the following months:

- a. August 2022.
- b. November 2022;
- c. January 2023.

If more than one type of residential termination notice is issued, provide a copy of each.

PA-I-47. Please provide a detailed description of all notices of delinquency or potential collection actions provided to residential customers during the period of time in which PWD/WRB was not terminating accounts for nonpayment. Separately provide a copy of each such notice provided to residential customers during this time.

PA-I-48. In Excel format, for each month for the most recent twelve months available, please provide:

- a. the average bill for residential accounts at existing rates provided in sufficient detail (including all input variables) to permit replication.
- b. the same bill information using the proposed rates rather than the existing rates.

PA-I-49. In Excel format, by month for the most recent 24 months available, please provide:

- a. The dollars of residential late fee revenue collected; and
- b. The number of residential accounts paying a late charge.

PA-I-50. Please provide an explanation and a detailed description of how residential late fees are allocated in the PWD cost-of-service study.

PA-I-51. Please provide a detailed explanation of the ratemaking treatment of late fee revenue.

PA-I-52. Please provide a single copy of all studies within PWD's custody or control documenting the effectiveness of a late payment charge as an incentive to pay for:

- a. Residential utility customers.
- b. Low-income residential customers.

PA-I-53. Please provide all written studies currently within PWD's custody or control, whether or not prepared by or for the PWD, that explicitly assess the extent to which the following activities reduce residential bad debt:

- a. Deferred payment agreements;
- b. Terminations for nonpayment;
- c. Late payment charges;
- d. Issuance of termination notice;
- e. Liens;
- f. Sequestration actions; and
- g. Debt collection actions.

PA-I-54. Please provide all written studies currently within PWD's custody or control, whether or not prepared by or for PWD, that explicitly assess the extent to which the following activities reduce residential arrears:

- a. Deferred payment agreements;
- b. Terminations for nonpayment;
- c. Late payment charges.
- d. Issuance of termination notice;
- e. Liens;
- f. Sequestration actions; and
- g. Debt collection actions.

PA-I-55. Please provide a copy of all reports, evaluations, memos, analyses or other written documents of any nature prepared since January 2015 establishing performance indicator targets to be met within the next year after publication of the performance targets; within the next two years after publication of the performance targets; or within the next three years after publication of the performance targets, with respect to:

- a. Debt prevention;
- b. Debt management;
- c. The treatment of vulnerable customers;
- d. Customer satisfaction.

PA-I-56. In Excel format, please provide, by month since July 2018:

- a. The number of new TAP new enrollees (defining a "new" enrollee as being a customer who is not currently a TAP participant and who is applying to enroll in the program).
- b. The total number of TAP participants.
- c. The number of TAP new enrollees had preprogram arrears at the time of enrollment.
- d. The aggregate dollars of preprogram arrears for TAP new enrollees at the time of enrollment.
- e. The average dollar amount of preprogram arrears for TAP new enrollees at the time of enrollment.

- f. The number of TAP bills issued in that month.
- g. The dollars of TAP bills issued in that month.
- h. The dollars of TAP credits / discounts (i.e., the difference between the TAP bill and bills at standard residential rates) in that month.
- i. The number of TAP payments in that month.
- j. The dollars of TAP payments in that month.
- k. The number of TAP full and on-time payments in that month.
- l. The number of TAP accounts in arrears in that month (excluding arrears that are solely preprogram arrears).
- m. The dollars of arrears on TAP accounts in that month (excluding arrears that are solely preprogram arrears).

PA-I-57. In Excel format, please provide by month since July 2018 a distribution, in bands of \$50, of preprogram arrears on the accounts of TAP participants newly enrolled in that month.

PA-I-58. In Excel format, please provide, by month since July 2018:

- a. The number of notices of termination for nonpayment issued to TAP participants.
- b. The number of TAP participant accounts that were terminated for nonpayment.
- c. The average arrears of TAP participant accounts at the time of termination for nonpayment (excluding arrears pre-existing at the time of TAP enrollment).
- d. The aggregate dollars of TAP participant accounts at the time of termination (excluding arrears pre-existing at the time of TAP enrollment).
- e. The number of TAP accounts that were terminated who were subsequently reconnected.

PA-I-59. In Excel format, please provide by month since January 2017:

- a. The number of budgeted PWD and/or WRB staff positions devoted exclusively to the operation of Customer Assistance Programs.
- b. The number of actual PWD and/or WRB staff positions devoted exclusively to the operation of Customer Assistance Programs.
- c. The number of budgeted PWD and/or WRB staff positions whose time is devoted partially to the operation of Customer Assistance Programs, including an identification for each position of the portion of time devoted to Customer Assistance Programs.
- d. The number of actual PWD and/or WRB staff positions whose time is devoted partially to the operation of Customer Assistance Programs, including an identification for each position of the portion of time devoted to Customer Assistance Programs.

- PA-I-60. Please provide a copy of all third party contracts with an entity outside PWD entered into since January 2017:
- a. Regarding information technology devoted exclusively to Customer Assistance Programs and/or TAP.
 - b. Regarding outreach devoted exclusively to Customer Assistance Programs and/or TAP.
 - c. Regarding eligibility verification devoted exclusively to Customer Assistance Programs and/or TAP.
 - d. Regarding intake devoted exclusively to Customer Assistance Programs and/or TAP (if different from “c”) (explain the difference, if any).

PA-I-61. In Excel format, please provide by month for each month July 2018 to present, a distribution of the number of residential accounts in arrears by the size of arrears by the following bands: (1) \$0; (2) \$1 - \$100; (3) \$101 - \$200; (4) \$201 - \$300; (5) \$301 - \$500; (6) \$501 - \$750; (7) \$751 - \$1,000; (8) \$1,001 - \$2,000; and (9) \$2,001 and above. If these bands are not available, please provide the numbers of accounts by which bands are available.

PA-I-62. In Excel format, separately provide the same data requested in the immediately preceding data request for TAP participants (excluding preprogram arrears).

PA-I-63. Please provide all written studies currently within the custody or control of PWD, whether or not prepared by or for PWD, that explicitly assess the relationship between the number of, or rate at which, the PWD issues termination notices and the reduction of residential bad debt.

PA-I-64. Please provide all written studies currently within the custody or control of PWD, whether or not prepared by or for PWD, that explicitly assess the relationship between the number of, or rate at which, PWD issues termination notices and the reduction of residential arrears.

PA-I-65. In Excel format, please identify any clusters of English as a Second Language (“ESL”) customers that exist in the PWD service territory by community, zip code, Census Tract, or other geographic region or area by which ESL is tracked. Separately provide a detailed explanation of how clusters of ESL customers are identified.

- PA-I-66. Please provide a detailed description of:
- a. The translation services available when a person contacts PWD and/or WRB through an automated or interactive telephone system.
 - b. The translation services available when a person contacts PWD and/or WRB through a human interaction.

- c. The translation services available when a person contacts PWD and/or WRB through a web-based system.
- d. How a person accesses the translation service when a person contacts PWD and/or WRB through an automated or interactive telephone system.
- e. How a person accesses the translation service when a person contacts PWD and/or WRB through a human interaction.
- f. How a person accesses the translations service when a person contacts PWD and/or WRB through a web-based system.

PA-I-67. Please provide a detailed description of how translations of written documents provided to customers are provided for:

- a. Credit and collection activities (including but not limited to shutoff notices).
- b. TAP outreach.
- c. Deferred payment plans.

Included within these explanations, provide a detailed explanation of the languages provided, how the choice of languages is made, and how the written documents in different languages are distributed.

PA-I-68. In Excel format, for each fiscal year 2019 to present inclusive, please provide both the number and percentage of payments received from residential customers via the following payment channels: mail, online, auto debit, credit/debit card, payment agents, other.

PA-I-69. In Excel format, please provide the same data as presented immediately above except in dollar terms rather than in terms of number of payments.

PA-I-70. In Excel format, for each fiscal year, 2019 to present inclusive, please provide both the number and percentage of payments received from residential customers via the following payment mechanisms: cash, check, debit card, credit card, ACH credit, ACH debit, prepaid EBT cards, mobile app.

PA-I-71. In Excel format, please provide the same data as presented immediately above except in dollar terms rather than in terms of number of payments.

PA-I-72. In Excel format, for each fiscal year 2019 to present inclusive, please provide the dollars of revenue generated from residential customers through any fee imposed for debit/credit card transactions. Separately designate the level of that fee per transaction. Provide the tariff page setting forth the level of that fee.

PA-I-73. If the response to the Question immediately above is not the product of the number of payments identified above times the per transaction fee, please provide an explanation of why not.

PA-I-74. Please provide a detailed explanation of the ratemaking treatment of the revenue derived from the fees imposed for debit/credit card payments.

PA-I-75. Please provide a detailed cost basis for the residential fee for credit and debit card transactions.

PA-I-76. In Excel format, for each month Fiscal Year 2018 to present (2023 year to date), please provide:

- a. The number of customers who were defaulted from TAP;
- b. Of the number of customers who were defaulted from TAP, the number who were defaulted from TAP for having been found to be no longer income-eligible at the time of recertification
- c. Of the number of customers who were defaulted from TAP, the number who were defaulted from TAP for providing incomplete residency information;
- d. Of the number of customers who were defaulted from TAP, the number who were defaulted from TAP for providing incomplete income information;
- e. Of the number of customers who were defaulted from TAP, the number who were defaulted for failing to engage in the recertification/reverification process;
- f. Of the number of customers who were defaulted from TAP, the number who were defaulted for some other reason (specifying each reason justifying the default).

PA-I-77. Please provide:

- a. A detailed explanation of the purpose of having a TAP participant confirm their residency given their active customer status and their active TAP participation status.
- b. Separately provide a detailed description of all ways in which an active TAP participant may no longer be a resident at the address where they are taking PWD service.

PA-I-78. Please provide:

- a. A detailed explanation of the purpose of having a TAP participant confirm their residency given their active customer status and their active TAP participation status.
- b. Separately provide a detailed description of all ways in which an active TAP participant may no longer be a resident at the address where they are taking PWD service.

PA-I-79. Please provide a single copy of the most recent Language Access Plan submitted by PWD to the City of Philadelphia. Separately provide a copy of the most recent Language Access Plan submitted by WRB to the City of Philadelphia.

PA-I-80. Please provide a single copy of any report, evaluation, study or other written document of any nature, within the custody or control of PWD, whether or not prepared by or for PWD, dated within the past five years, identifying, evaluating or otherwise discussing why nonpaying residential customers do not make contact with the utility when, in response to bill nonpayment, those nonpaying customers receive a request or notice to contact a utility to avoid the termination of service.

PA-I-81. Please provide a single copy of any report, evaluation, study or other written document of any nature, within the custody or control of PWD, whether or not prepared by or for PWD, dated within the past five years, identifying, evaluating or otherwise discussing why residential customers do not successfully complete deferred payment plans (sometimes known as payment agreements or other similar terms) in order to avoid the termination of service for nonpayment.

PA-I-82. Please provide, dated within the past five years, a copy of all reports, evaluations, memos, analyses or other written documents of any nature containing any PWD methodology, procedure or process designed to systematically review, study or assess PWD residential billing and/or payment records in an effort to:

- a. Characterize patterns of nonpayment;
- b. Identify the characteristics of nonpayers;
- c. Identify predictors of nonpayment;
- d. Identify strategies to reduce nonpayment;
- e. Identify early indicators of nonpayment.

PA-I-83. Please provide a detailed explanation of all shutoff protections provided to low-income or other vulnerable households.

PA-I-84. Please provide a detailed description of all ways in which shutoff protections differ depending on whether the resident of the home is:

- a. the homeowner;
- b. a tenant-customer;
- c. an occupant-customer;
- d. a non-customer tenant; or
- e. a non-customer occupant.

For each such difference in shutoff protection identified, provide a citation to the PWD/WRB regulation which authorizes the different treatment.

PA-I-85. In Excel format, please provide by month from January 2022 to the present, the number of:

- a. Residential customers who PWD had identified as being protected from nonpayment terminations due to their low-income or vulnerable status;
- b. The number of low-income and/or vulnerable customers whose accounts were terminated for nonpayment.

PA-I-86. Please provide a detailed explanation of the PWD and/or WRB process for determining whether and/or when it is appropriate to terminate a residential account for nonpayment notwithstanding the customer's status as a low-income and/or vulnerable customer.

PA-I-87. Please provide all written internal PWD and/or WRB processes and procedures governing whether and/or when it is appropriate to terminate a residential account for nonpayment notwithstanding the customer's status as a low-income and/or vulnerable customer.

PA-I-88. Please provide all written internal PWD and/or WRB processes and procedures for identifying whether and/or when a customer is a low-income and/or vulnerable customer.