

**RESPONSE TO**  
**PUBLIC ADVOCATE'S INTERROGATORIES**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**QUESTIONS 1-88**

**Dated: February 2023**

1 **PA-I-1.** IN EXCEL FORMAT, BY MONTH FOR JULY 2018 THROUGH PRESENT,  
2 PLEASE PROVIDE THE NUMBER OF CUSTOMER ASSISTANCE  
3 PROGRAM (CAP) ENROLLEES WHOSE INCOME INFORMATION WAS  
4 ACCEPTED FOR ENROLLMENT IN A CUSTOMER ASSISTANCE  
5 PROGRAM DUE TO THE AUTOMATIC ACCEPTANCE OF INCOME  
6 PROVISIONS OF PHILADELPHIA CODE §19-1605(3)(I)(.2) (REQUIRING  
7 ACCEPTANCE OF DETERMINATIONS OF INCOME AND RESIDENCY).  
8

9 **RESPONSE:**

10 The Customer Assistance Management Program (CAMP) began tracking OOPA approvals  
11 in an automated fashion in April of 2018. OOPA information is incorporated into  
12 consideration of all assistance programs. The response attached as PA-I-1 shows the number  
13 of customer assistance program enrollees each month, by program, beginning in April 2018,  
14 for whom approved OOPA income information was accepted, as required by Philadelphia  
15 Code §19-1605(3)(I)(.2) (Requiring Acceptance of Determinations of Income and  
16 Residency). Historical months' results may vary slightly from results provided in PA-III-60  
17 of the 2020 rate case and PA-III-1 of the 2021 rate case as the underlying OOPA approval  
18 data records still available have changed in the interim.  
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20 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-I-2.** IN EXCEL FORMAT, BY MONTH FOR JULY 2018 THROUGH PRESENT,  
2 PLEASE PROVIDE THE NUMBER OF CUSTOMER ASSISTANCE  
3 PROGRAM ENROLLEES WHOSE RESIDENCY INFORMATION WAS  
4 ACCEPTED FOR ENROLLMENT IN A CUSTOMER ASSISTANCE  
5 PROGRAM DUE TO THE AUTOMATIC ACCEPTANCE OF RESIDENCY  
6 PROVISIONS OF PHILADELPHIA CODE §19-1605(3)(I)(.2) (REQUIRING  
7 ACCEPTANCE OF DETERMINATIONS OF INCOME AND RESIDENCY).  
8

9 **RESPONSE:**

10 The Customer Assistance Management Program (CAMP) began tracking OOPA approvals  
11 in an automated fashion in April of 2018. OOPA information is incorporated into  
12 consideration of all assistance programs. The response attached as PA-I-1 shows the number  
13 of customer assistance program enrollees each month, by program, beginning in April 2018,  
14 for whom approved OOPA residency information was accepted, as required by Philadelphia  
15 Code §19-1605(3)(I)(.2) (Requiring Acceptance of Determinations of Income and  
16 Residency). Historical months' results may vary slightly from results provided in PA-III-1  
17 of the 2021 rate case as the underlying OOPA approval data records still available have  
18 changed in the interim.  
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20 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**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.

**RESPONSE:**

There are no documents available that capture the information requested. Also see PA-I-4.

**RESPONSE PROVIDED BY:** Philadelphia Water Department

1 **PA-I-4.** PLEASE COMPARE AND CONTRAST THE INCOME-ELIGIBILITY  
2 REQUIREMENTS FOR THE PHILADELPHIA TAX HARDSHIP  
3 ASSISTANCE PROGRAM CODIFIED AT PHILADELPHIA CODE §19-1305  
4 AND TAP.  
5

6 **RESPONSE:**

7 There is no Philadelphia Tax Hardship Program. Please refer to The Philadelphia Code  
8 sections 19-1305 and 19-1605 (available here:  
9 [https://codelibrary.amlegal.com/codes/philadelphia/latest/philadelphia\\_pa/0-0-0-184124](https://codelibrary.amlegal.com/codes/philadelphia/latest/philadelphia_pa/0-0-0-184124)),  
10 Philadelphia Water Department Regulations, Section 206.0, et seq. (available here:  
11 <http://www.phila.gov/water/PDF/PWDregCH2.pdf>), and the Department of Revenue Real  
12 Estate Tax Regulations for City of Philadelphia and School District of Philadelphia, Section  
13 302, et seq. (available here: [https://beta.phila.gov/documents/owner-occupied-payment-  
14 agreement-oopa-regulations/](https://beta.phila.gov/documents/owner-occupied-payment-agreement-oopa-regulations/))).  
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16 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-I-5.** IN EXCEL FORMAT, BY WEEK, SINCE JULY 1, 2018, PROVIDE THE  
2 NUMBER OF TAP PARTICIPANTS WHO ARE:

- 3 A. HOMEOWNERS  
4 B. TENANTS  
5 C. OCCUPANTS  
6

7 **RESPONSE:**

8 The number of TAP enrollees by homeowner/tenant/occupant status, by week, is  
9 provided in the attachment PA-I-5. For this and other reporting related to tenants, the term  
10 is limited to tenant customers. Though WRB and PWD are aware that some tenants are  
11 not water customers, there are no reports that capture the full tenant population.  
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13 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-I-6.** PLEASE PROVIDE A DETAILED DESCRIPTION OF ALL DIFFERENCES IN  
2 TAP APPLICATIONS, OR IN THE REVIEW OR OTHER TREATMENT OF  
3 TAP APPLICATIONS, BASED ON WHETHER THE APPLICANT IS:

- 4 A. A HOMEOWNER;  
5 B. A TENANT;  
6 C. AN OCCUPANT.

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8 **RESPONSE:**

9 Homeowners, tenants, and occupants can apply for TAP using the same application as  
10 long as they are the water customer of record. The review and treatment of all applications  
11 is the same.

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13 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Raftelis Financial  
14 Consultants, Inc.

1 **PA-I-7.** IN EXCEL FORMAT, DISAGGREGATED BY HOMEOWNERS, TENANTS,  
2 AND OCCUPANTS, BY MONTH FOR THE MONTHS JULY 2018 TO  
3 PRESENT, PLEASE PROVIDE:

- 4 A. THE NUMBER OF CUSTOMER ASSISTANCE PROGRAM  
5 APPLICANTS (DEFINING AN “APPLICANT” AS A CUSTOMER WHO  
6 IS NOT CURRENTLY A CUSTOMER ASSISTANCE PROGRAM  
7 PARTICIPANT AT THE TIME OF APPLICATION);
- 8 B. THE NUMBER OF NEW TAP ENROLLEES (DEFINING A “NEW  
9 ENROLLEE” AS A CUSTOMER NOT CURRENTLY PARTICIPATING  
10 IN TAP WHO BEGINS PARTICIPATION IN TAP);
- 11 C. THE NUMBER OF NEW SENIOR CITIZEN DISCOUNT ENROLLEES  
12 WHO ARE ALSO ON TAP;
- 13 D. THE NUMBER OF NEW SENIOR CITIZEN DISCOUNT ENROLLEES  
14 WHO ARE NOT ON TAP;
- 15 E. THE NUMBER OF CUSTOMER ASSISTANCE PROGRAM  
16 APPLICANTS WHO WERE PLACED IN ANOTHER PAYMENT  
17 AGREEMENT OR RATE DISCOUNT, DISAGGREGATED BY TYPE OF  
18 AGREEMENT OR RATE DISCOUNT.
- 19 F. THE NUMBER OF CUSTOMER ASSISTANCE PROGRAM  
20 APPLICANTS WHOSE APPLICATION WAS DENIED DUE TO A  
21 FAILURE TO PROVIDE ADEQUATE PROOF OF RESIDENCE;
- 22 G. THE NUMBER OF CUSTOMER ASSISTANCE PROGRAM  
23 APPLICANTS WHOSE APPLICATION WAS DENIED DUE TO A  
24 FAILURE TO PROVIDE ADEQUATE PROOF OF INCOME;
- 25 H. THE NUMBER OF CUSTOMER ASSISTANCE PROGRAM  
26 APPLICANTS WHO WERE DENIED FOR OTHER REASONS  
27 (SPECIFYING WHAT THOSE “OTHER” REASONS ARE);  
28



1 I. THE NUMBER OF NEW TAP ENROLLEES BY WHETHER THE NEW  
2 ENROLLEE HAS A PRE-EXISTING ARREARS SUBJECT TO  
3 ARREARAGE FORGIVENESS.  
4

5 **RESPONSE:**

6 (A) Refer to PA-I-25 and PA-I-26 for reporting that includes the number of customer  
7 assistance program applicants. Existing reporting does not distinguish first-time TAP  
8 enrollees from recertifications as defined in the question.

9 (B, I) Refer to the response PA-I-56 for information on the numbers of new enrollees, and  
10 the arrearages of new enrollees. Existing reporting does not distinguish first-time TAP  
11 enrollees from recertifications as defined in the question.

12 (C, D) Existing reporting does not capture the TAP status of new Senior Citizen program  
13 enrollees.

14 (E, F, G, H) Attachment PA-I-7 provides data on TAP application outcomes, starting with  
15 August 2021, when that information was first reported this way. Sheets labelled “Summary  
16 of Enrollment...” count the number of applications that resulted in enrollment in TAP and  
17 the number that did not result in enrollment. Sheets labelled “Not Enrolled In TAP...” show  
18 the number of applications that did not result with the applicant being enrolled in TAP by  
19 the reason the application was not approved. The “All Applications” column counts the  
20 number of all applications, while the “Previously Enrolled in TAP” column counts the  
21 number of applications received from applicants who had been in TAP previously but left  
22 for any reason. Customers may not be enrolled in TAP for any of the following reasons:

23 - Applicant was instead enrolled in a more affordable alternative than TAP. Alternatives  
24 are:

- 25 ○ Citizen Discounted Bill + Extended Payment Agreement (LONGSTD)
- 26 ○ Senior Citizen Discounted Bill\*
- 27 ○ Regular Bill + Extended Payment Agreement (LONGSTD)
- 28 ○ Regular Bill\*

- WRBCC Agreement

\* May include standard payment agreement.

- Application was denied for one of the following reasons:

- Failed to meet Income and Residency Guidelines
- Failed to meet Income Guidelines (no Special Hardship)
- Failed to meet Residency Guidelines
- Installation Type Not Eligible for TAP
- Missing or Invalid Income or Residency Documentation
- Missing application form information not submitted
- Failed to prove Special Hardship

- Application had another outcome, listed below:

- Withdrawn by the customer
- Data was transferred to a newer application for processing

Existing reporting does not distinguish between homeowner/tenant/occupant status and is therefore not presented as disaggregated.

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

1 **PA-I-8.** IN EXCEL FORMAT, PLEASE PROVIDE ANY BUDGET DOCUMENT (OR  
2 OTHER WRITTEN DOCUMENT OF ANY NATURE) PREPARED IN THE  
3 PERIOD FISCAL YEAR 2018 TO PRESENT:

- 4 A. PROJECTING TAP PARTICIPATION BY MONTH;  
5 B. PRESENTING A SIDE-BY-SIDE COMPARISON OF PROJECTED TAP  
6 PARTICIPATION VERSUS ACTUAL TAP PARTICIPATION.  
7 C. PROJECTING CUSTOMER ASSISTANCE PROGRAM PARTICIPATION  
8 BY MONTH  
9 D. PRESENTING A SIDE-BY-SIDE COMPARISON OF PROJECTED  
10 CUSTOMER ASSISTANCE PROGRAM PARTICIPATION VERSUS  
11 ACTUAL CUSTOMER ASSISTANCE PROGRAM PARTICIPATION.  
12

13 **RESPONSE:**

14 TAP participation projections are made as part of the TAP Rate Rider reporting, projections  
15 are provided in the TAP Rate Adjustment Proceeding.

16 Please see PA-I-56 for actual TAP participation. Existing reporting does not compare past  
17 projections with actual participation.

18 Projections for other assistance programs are not made. Actual participation in customer  
19 assistance programs is discussed in response to PA-I-29.  
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21 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-I-9.** CONFIRM OR DENY: THE ADMINISTRATIVE COSTS ASSOCIATED WITH  
2 TAP ARE NOT SUBJECT TO RECONCILIATION THROUGH PWD'S TAP  
3 RIDER. IF DENIED, PLEASE IDENTIFY IN THE RATE RIDER THE  
4 SPECIFIC LOCATION AT WHICH THE RECONCILIATION OF  
5 ADMINISTRATIVE COSTS IS IDENTIFIED AND/OR DISCUSSED.  
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7 **RESPONSE:**

8 Confirm.  
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10 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-I-10.** IN EXCEL FORMAT, BY YEAR, FOR EACH FISCAL YEAR 2017 TO  
2 PRESENT, PLEASE IDENTIFY THE SPECIFIC DOLLAR AMOUNT OF  
3 ADMINISTRATIVE COSTS FOR CUSTOMER ASSISTANCE PROGRAMS  
4 BUDGETED, DISAGGREGATED BY:  
5 A. WAGES;  
6 B. BENEFITS;  
7 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);  
8 D. INFORMATION TECHNOLOGY;  
9 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS  
10 CALCULATED);  
11 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE "OTHER" IS);  
12 G. THE TOTAL OF ALL ADMINISTRATIVE COSTS.

13  
14 PLEASE IDENTIFY THE PERCENTAGE OF THE ABOVE REFERENCED  
15 ADMINISTRATIVE COSTS BUDGETED FOR TAP, SENIOR CITIZEN  
16 DISCOUNT, PAYMENT AGREEMENTS AND OTHER PROGRAMS (PLEASE  
17 IDENTIFY).

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19 **RESPONSE:**

20 Preparation of this response is in progress and will be provided in the future.  
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22 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-I-11.** IN EXCEL FORMAT, PLEASE IDENTIFY, BY MONTH SINCE JULY 2017,  
2 THE ACTUAL DOLLAR AMOUNT OF ADMINISTRATIVE COSTS  
3 EXPENDED ON CUSTOMER ASSISTANCE PROGRAMS,  
4 DISAGGREGATED BY:  
5 A. WAGES;  
6 B. BENEFITS;  
7 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);  
8 D. INFORMATION TECHNOLOGY;  
9 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS  
10 CALCULATED);  
11 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE "OTHER" IS);  
12 G. THE TOTAL OF ALL ADMINISTRATIVE COSTS.

13  
14 PLEASE IDENTIFY THE PERCENTAGE OF THE ABOVE REFERENCED  
15 ADMINISTRATIVE COSTS EXPENDED FOR TAP, SENIOR CITIZEN  
16 DISCOUNT, PAYMENT AGREEMENTS AND OTHER PROGRAMS (PLEASE  
17 IDENTIFY).

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19 **RESPONSE:**

20 Preparation of this response is in progress and will be provided in the future.  
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22 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-I-12.** IN EXCEL FORMAT, BY YEAR, FOR EACH FISCAL YEAR 2017 TO  
2 PRESENT, PLEASE IDENTIFY THE SPECIFIC DOLLAR AMOUNT OF  
3 CUSTOMER ASSISTANCE PROGRAM ADMINISTRATIVE COSTS  
4 CURRENTLY BEING COLLECTED IN PWD BASE RATES,  
5 DISAGGREGATED BY:  
6 A. WAGES;  
7 B. BENEFITS;  
8 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);  
9 D. INFORMATION TECHNOLOGY;  
10 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS  
11 CALCULATED);  
12 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE "OTHER" IS);  
13 G. THE TOTAL OF ALL ADMINISTRATIVE COSTS.

14  
15 PLEASE IDENTIFY THE PERCENTAGE OF THE ABOVE REFERENCED  
16 ADMINISTRATIVE COSTS EXPENDED FOR TAP, SENIOR CITIZEN  
17 DISCOUNT, PAYMENT AGREEMENTS AND OTHER PROGRAMS (PLEASE  
18 IDENTIFY).

19  
20 **RESPONSE:**

21 Preparation of this response is in progress and will be provided in the future.  
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23 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-I-13.** IN EXCEL FORMAT, BY YEAR, FOR EACH FISCAL YEAR 2017 TO  
2 PRESENT, PLEASE IDENTIFY THE SPECIFIC DOLLAR AMOUNT OF FEES  
3 PAID TO EACH CONTRACTED THIRD-PARTY VENDOR AND/OR  
4 CONSULTANT REGARDING CUSTOMER ASSISTANCE PROGRAMS,  
5 DISAGGREGATED BY VENDOR AND/OR CONSULTANT:  
6 A. BUDGETED FOR THE FISCAL YEAR;  
7 B. EXPENDED DURING THE FISCAL YEAR;  
8 C. INCLUDED IN RATES IN THE FISCAL YEAR.

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10 **RESPONSE:**

11 Preparation of this response is in progress and will be provided in the future.  
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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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**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.

**RESPONSE:**

PWD has filed Objections to this data request which are pending.

**RESPONSE PROVIDED BY:** Philadelphia Water Department

1 **PA-I-15.** IN EXCEL FORMAT, PLEASE PROVIDE ALL PAYMENT PATTERN  
2 REPORTS BY MONTH FOR JULY 2018 TO PRESENT FOR ALL CUSTOMER  
3 ASSISTANCE PROGRAM PARTICIPANTS, DISAGGREGATED BY  
4 PROGRAM.

5  
6 **RESPONSE:**

7 Refer to attachment PA-I-15. There are no existing payment pattern reports for all  
8 customer assistance program participants disaggregated by program. However, there is  
9 reporting on TAP and Senior Citizen Discount program participants.

10  
11 The attached report summarizes information by fiscal year for customer bills in one of  
12 three categories (outlined below). The total billings, after all discounts, and payments  
13 against those billings are summarized by payment timeframe. The three customer bill  
14 categories are:

15 1) TAP: These are bills that are issued while a customer is participating in the  
16 City's Tiered Assistance Program (TAP). The TAP discount is included in the  
17 "billings" figure. If a TAP customer is also classified as a senior citizen discount  
18 customer, customer type 'D', and bills are reduced by both the senior citizen  
19 discount and the TAP discount (resulting in bill equal to the customer's TAP  
20 amount), they are included in this category. Because TAP bills were only issued  
21 beginning in FY18, there are no TAP billings prior to FY18.

22 2) Senior Citizens Discount: These are bills issued for customers receiving a senior  
23 citizen discount during the month of the bill). They are not TAP bills, nor do they  
24 have associated TAP discounts.

25 3) TAP Customers Outside of TAP Enrollment: These are bills that are issued to  
26 customers that have participated in TAP before or after the bill. They are not TAP  
27 bills nor do they have associated TAP discounts. If any TAP customers outside of  
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1 TAP enrollment are receiving bills with a senior citizen discount, those bills are  
2 counted in the Senior Citizens Discount category.

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4 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-I-16.** IN EXCEL FORMAT, PLEASE PROVIDE ALL PAYMENT PATTERN  
2 REPORTS BY MONTH FOR JULY 2018 TO PRESENT FOR ALL  
3 RESIDENTIAL CUSTOMERS NOT ENROLLED IN A CUSTOMER  
4 ASSISTANCE PROGRAM.

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6 **RESPONSE:**

7 After reasonable investigation, no report has been identified that captures the information  
8 requested.

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

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1 **PA-I-17.** IN PREPARING THOSE PAYMENT PATTERN REPORTS, PLEASE DEFINE  
2 THE TERMS:  
3 A. BILLINGS  
4 B. PAYMENTS  
5 C. TOTAL PERCENT COLLECTED  
6

7 **RESPONSE:**

8 As they relate to FY 2022 Payment Patterns report, included in Raftelis' direct testimony  
9 in PWD Statement No. 6, Schedule RFC-7, the following terms are defined.  
10

11 Billings are defined as service and usage charge transaction types from the basis2  
12 *cis\_transactions* table, with creation dates during the fiscal year in question. Billings  
13 include all City accounts except those designated as PWD accounts; they include only  
14 retail customers, excluding any wholesale customers. Total billings are split between Non-  
15 Stormwater Only (Non-SWO) and Stormwater Only (SWO) accounts based on the  
16 account's installation designation contained in the basis2 *cis\_installations* table.  
17

18 Payments for accounts other than City accounts are defined as receipt or transfer credits  
19 allocated to Billings (see definition above). In prior years, Payment timeframes reflected  
20 the fiscal year of the *allocation date* of the credit in basis2 with the *creation date* of the  
21 charge to which payments are allocated. Beginning with FY22 reporting, the report  
22 compares the *creation date* of the credit in basis2 with the creation date of the charge. This  
23 aligns the timeframes of payments with the timeframes of when those payments are  
24 received by the City. Payments in the 'Billing Year' are those that were received by the  
25 end of the fiscal year in which they were billed. Payments in 'Billing year +1' are those  
26 that were received during the subsequent fiscal year. Payments in 'Billing year +2 and  
27 beyond' are those that were received any time after the subsequent fiscal year. Grants are  
28 included as payments in this report.

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Total percent collected is calculated as the Total Payments (see definition above) for the time period of interest (Billing Year, Billing Year + 1, or Billing Year + 2 and Beyond) divided by the Total Billings (see definition above) for the fiscal year of interest.

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

1 **PA-I-18.** IN ASSESSING COLLECTIONS FOR PWD, PLEASE:

2 A. DEFINE THE TERM “RECEIPTS”

3 B. SEPARATELY INDICATE HOW THE DISTINCTION BETWEEN  
4 “BILLINGS” AND “RECEIPTS” IS USED IN CALCULATING RATE  
5 LEVELS.

6  
7 **RESPONSE:**

8 A. Receipts in the Cost of Service study are defined as follows:

- 9 • In the context of retail revenues, receipts refer to the cumulative anticipated  
10 actual revenues in each fiscal year, for the water, sanitary sewer, and  
11 stormwater services. The cumulative actual revenues of a given fiscal year are  
12 estimated as the sum of payments received in “billing year,” “billing year plus  
13 1,” and “billing year plus 2 and beyond.” “Billings” for each fiscal year are  
14 first projected based on existing rate schedules, projected units of service, and  
15 bill tabulation results. Appropriate collection factors are then applied to billings  
16 to estimate the actual cumulative “receipts” for the fiscal year. Please also see  
17 the explanation Section 1.4.1 on Page 1-13 and 1-14 of the “Water and  
18 Wastewater Cost of Service Report” as provided in PWD Statement No. 7,  
19 Schedule BV-2.
- 20 • In the context of wholesale revenues, receipts refer to 100% of billings  
21 estimated for each wholesale customer.

22  
23 B. For the purpose of this response, we assume “rate levels” referenced in the question  
24 above means the annual “additional revenues” projected in the FY 2023 through FY  
25 2028 financial plan. The annual “additional revenues” (rate levels) for each fiscal  
26 year are then calculated based on the estimated cumulative receipts of the fiscal year.  
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1 The application of collection factors is outlined in Section 3.1.4.3 on Page 3-6 and  
2 3-7 of the “Water and Wastewater Cost of Service Report” as provided in PWD  
3 Statement No. 7, Schedule BV-2.  
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5 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-I-19.** PLEASE PROVIDE A COPY OF ALL AGENDAS AND ALL MINUTES OF  
2 TAP ADVISORY COMMITTEE MEETINGS FROM JULY 1, 2018 TO  
3 PRESENT.  
4

5 **RESPONSE:**

6 For purposes of this response, we assume TAP Advisory Committee also includes RCAS.  
7

8 Agendas for TAP Advisory Committee meetings were produced in response to discovery  
9 requests PA-V-13 and PA-V-14 in the 2018 rate proceeding and in response to discovery  
10 request PA-III-20 in the 2021 rate proceeding and are available on the Rate Board's  
11 webpage.  
12

13 This response will be supplemented with meeting notes and agendas to bring current the  
14 prior responses.  
15

16 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-I-20.** PLEASE PROVIDE A COPY OF ALL WRITTEN PRESENTATIONS, MEMOS  
2 OR OTHER WRITTEN DOCUMENTS OF ANY NATURE FROM PWD OR  
3 WRB (INCLUDING THEIR CONSULTANTS) PROVIDED TO TAP  
4 ADVISORY COMMITTEE MEMBERS AT AN ADVISORY COMMITTEE  
5 MEETING FROM JULY 1, 2018 TO PRESENT.

6

7 **RESPONSE:**

8 Please see response to PA-I-19.

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10 **RESPONSE PROVIDED BY:** Philadelphia Water Department

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1 **PA-I-21.** PLEASE PROVIDE A COPY OF ALL WRITTEN PRESENTATIONS, MEMOS  
2 OR OTHER WRITTEN DOCUMENTS OF ANY NATURE FROM PWD OR  
3 WRB (INCLUDING THEIR CONSULTANTS) PROVIDED TO CITY  
4 COUNCIL, THE WATER BOARD, THE MAYOR'S OFFICE, OR ANY OTHER  
5 PHILADELPHIA MUNICIPAL ENTITY OR OFFICIAL REGARDING TAP  
6 FROM JULY 2017 TO PRESENT.

7  
8 **RESPONSE:**

9 Preparation of this response is in progress and will be provided in the future.

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11 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-I-22.** PLEASE PROVIDE A COPY OF ALL PRESENTATIONS BY A PWD OR WRB  
2 OFFICIAL OR STAFF MEMBER (INCLUDING RAFTELIS AND/OR BLACK  
3 AND VEATCH PERSONNEL) TO A CONFERENCE, SEMINAR, OR OTHER  
4 PUBLIC OR INDUSTRY GATHERING REGARDING TAP FROM JULY 2017  
5 TO PRESENT.  
6

7 **RESPONSE:**

8 The requested presentations were produced in response to discovery request PA-III-23 in  
9 the 2021 rate proceeding and are available on the Rate Board's webpage. Please see  
10 response attachment PA-I-22, for additional requested presentations made since the  
11 issuance of the prior discovery response.  
12

13 The attached documents may contain figures and estimates that may no longer represent  
14 TAP program performance or other metrics (such as lost revenue). The participant is  
15 directed to the current filing before the Water, Sewer and Storm Water Rate Board for  
16 current program statistics.  
17

18 **RESPONSE PROVIDED BY:** Philadelphia Water Department, Water Revenue Bureau, Raftelis  
19 Financial Consultants, Inc., and Black and Veatch Management Consulting, LLC.  
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- 1 **PA-I-23.** PLEASE PROVIDE A COPY OF ALL ARTICLES AUTHORED OR CO-  
2 AUTHORED BY A PWD OR WRB OFFICIAL, OR BY RAFTELIS AND/OR  
3 BLACK AND VEATCH PERSONNEL, PUBLISHED BETWEEN JULY 2017  
4 AND THE PRESENT IN A:
- 5 A. PEER REVIEWED JOURNAL PUBLISHED BY AN ACADEMIC  
6 INSTITUTION OF HIGHER LEARNING;
  - 7 B. PEER REVIEWED JOURNAL PUBLISHED BY A WATER INDUSTRY  
8 ASSOCIATION OR INDUSTRY ENTITY;
  - 9 C. PEER REVIEWED JOURNAL PUBLISHED BY AN ENVIRONMENTAL,  
10 OR ENVIRONMENTAL FINANCE, ASSOCIATION OR OTHER  
11 ENVIRONMENTAL OR ENVIRONMENTAL FINANCE ENTITY;
  - 12 D. A PEER-REVIEWED JOURNAL PUBLISHED BY ANY OTHER  
13 INSTITUTION NOT IDENTIFIED ABOVE.

14  
15 **RESPONSE:**

16 PWD and WRB personnel and consultants may publish articles in trade journals such as  
17 the American Water Works Association (AWWA), the National Association of Clean  
18 Water Agencies (NACWA), the Water Environment Federation (WEF), etc.

19  
20 The webpages are provided for your ease of use and reference: <https://www.wef.org/>,  
21 <https://www.awwa.org/>, and <https://www.nacwa.org/> should you wish to avail yourself of  
22 materials.

23  
24 The published articles may contain figures and estimates that may no longer represent  
25 current performance or metrics. The participant is directed to the current filing before the  
26 Water, Sewer and Storm Water Rate Board for current statistics and available relevant  
27 data.

1 **RESPONSE PROVIDED BY:** Philadelphia Water Department, Water Revenue Bureau, Raftelis  
2 Financial Consultants, Inc., Black & Veatch Management Consulting, LLC

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1 **PA-I-24.** PLEASE PROVIDE A COPY OF ALL WHITE PAPERS, REPORTS, OR  
2 EVALUATIONS OF THE PHILADELPHIA TAP AUTHORED OR CO-  
3 AUTHORED BY A PWD OR WRB OFFICIAL OR STAFF MEMBER, OR BY  
4 RAFTELIS AND/OR BLACK AND VEATCH PERSONNEL, PUBLISHED BY  
5 PWD, WRB, RAFTELIS OR BLACK AND VEATCH FROM JULY 2017 TO  
6 PRESENT.

7  
8 **RESPONSE:**

9 After reasonable investigation, no published white papers, reports or evaluations have  
10 been identified that are responsive to this discovery request.

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12 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau  
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1 **PA-I-25.** IN EXCEL FORMAT, PLEASE PROVIDE A SINGLE COPY, FOR THE  
2 PERIOD JULY 1, 2018 TO PRESENT, OF THE FOLLOWING:  
3 A. EACH DAILY AND WEEKLY CUSTOMER ASSISTANCE  
4 APPLICATION PROCESSING REPORT;  
5 B. EACH REPORT PROVIDING MONTHLY PROGRAM PARTICIPATION  
6 STATISTICS;  
7 C. EACH REPORT PROVIDING MONTHLY PROGRAM COSTS;  
8 D. EACH PERIODIC CITY COUNCIL-REQUIRED REPORT; AND  
9 E. EACH OTHER AD HOC AND PERIODIC REPORTS TO SUPPORT  
10 MANAGEMENT OF CUSTOMER ASSISTANCE PROGRAMS THAT  
11 HAS BEEN REQUESTED AND DEVELOPED.  
12

13 **RESPONSE:**

14 Attached are existing reports that are responsive to this discovery request. In some cases,  
15 older versions may be available as described in response to PA-III-25 from the 2021  
16 General Rate Proceeding. Attachment PA-I-25\_A provides weekly application processing  
17 reports. Due to the volume of data, this is provided as five attachments (PA-I-25\_A\_2018,  
18 PA-I-25\_A\_2019, PA-I-25\_A\_2020, PA-I-25\_A\_2021, PA-I-25\_A\_2022).

19 Refer to PA-I-56 for monthly program participation statistics and TAP discounts. Each  
20 version of this report includes historical data, as of the current date. Historical versions are  
21 included as PA-I-25\_3E. Attachment PA-I-21 provides all periodic City Council-required  
22 reports. PA-I-25\_E provides ad hoc and periodic reports, including reports on:

- 23 - Total customer program enrollment with applications in Approved or Active status  
24 (PA-I-25\_E1)
  - 25 - Prior performance measures reports were provided as Attachment PA-III-25 in the  
26 2021 General Rate Proceeding. One additional performance measures report  
27 produced since that time is provided (PA-I-25\_E2).
- 28



- 1           - Historical versions of the Monthly TAP Statistics report through January 1, 2023
- 2           (PA-I-25\_E3)
- 3           - Quarterly reports on received and approved applications (PA-I-25\_E4)
- 4           - TAP approvals by applicant arrearage and income relative to Federal Poverty
- 5           Guidelines (PA-I-25\_E5-2020, PA-I-25\_E5-2021, PA-I-25\_E5-2022). Due to the
- 6           volume of data, this is provided as three attachments.

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

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- 1 **PA-I-26.** IN EXCEL FORMAT, PLEASE PROVIDE A SINGLE COPY, FOR THE  
2 PERIOD JULY 1, 2018 TO PRESENT, OF THE FOLLOWING:
- 3 A. EACH REPORT REPORTING THE NUMBER OF CUSTOMER  
4 ASSISTANCE PROGRAM AND/OR TAP APPLICATIONS  
5 REQUESTED, BY METHOD REQUESTED;
  - 6 B. EACH REPORT REPORTING THE NUMBER OF CUSTOMER  
7 ASSISTANCE PROGRAM AND/OR TAP APPLICATIONS SUBMITTED,  
8 BY METHOD SUBMITTED;
  - 9 C. EACH REPORT REPORTING THE NUMBER OF APPLICATIONS BY  
10 STATUS CHANGE;
  - 11 D. EACH REPORT REPORTING THE NUMBER OF CUSTOMERS BY  
12 PROGRAM ENROLLED;
  - 13 E. EACH REPORT REPORTING TAP PARTICIPATION LEVELS;
  - 14 F. EACH REPORT REPORTING TAP DISCOUNT AMOUNTS;
  - 15 G. EACH REPORT REPORTING THE NUMBER OF TAP BILL  
16 PAYMENTS;
  - 17 H. EACH REPORT REPORTING THE DOLLARS OF TAP BILL  
18 PAYMENTS;
  - 19 I. EACH REPORT REPORTING THE NUMBER OF ACCOUNTS WITH  
20 PRE-EXISTING ARREARS (WITH PRE-EXISTING BEING THOSE  
21 ARREARS THAT WERE INCURRED PRIOR TO TAP ENROLLMENT)  
22 NOT YET FORGIVEN;
  - 23 J. EACH REPORT REPORTING THE DOLLARS OF PRE-EXISTING  
24 ARREARS NOT YET FORGIVEN;
  - 25 K. EACH REPORT REPORTING THE NUMBER OF ACCOUNTS WITH  
26 ARREARS FORGIVEN IN A PARTICULAR TIME PERIOD;
  - 27 L. EACH REPORT REPORTING THE DOLLARS OF ARREARS  
28 FORGIVEN IN A PARTICULAR TIME PERIOD.

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**RESPONSE:**

Daily reporting on the number of applications requested (by method), submitted (by method), and final dispositions are included as attachment PA-I-26\_AB. These reports also include cumulative information since the beginning of the program. Weekly reporting on applications submitted and reviewed are included as PA-I-26\_CD.

Refer to the response to PA-I-56 and attachment PA-I-56 for reporting that includes TAP participation, TAP discounts, and TAP bill payments.

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

1 **PA-I-27.** PLEASE PROVIDE IN EXCEL FORMAT THE NUMBER OF TAP  
2 PARTICIPANTS AS OF THE END OF THE MONTH BY MONTH FOR EACH  
3 MONTH JANUARY 2018 TO PRESENT.  
4

5 **RESPONSE:**

6 The Monthly TAP Program Statistics report, provided as attachment PA-I-56, includes the  
7 number of TAP participants in each month since the beginning of TAP. Participants are  
8 defined as the number of unique customers that received a TAP bill during a particular  
9 month.  
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11 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-I-28.** IN EXCEL FORMAT, PLEASE PROVIDE THE NUMBER OF TAP EXITS, BY  
2 REASON FOR THE EXIT, BY MONTH SINCE JULY 2018 TO PRESENT  
3 INCLUSIVE.  
4

5 **RESPONSE:**

6 A monthly report on this topic does not exist, however, the ordinance requiring an Annual  
7 Report to the Mayor and City Council on TAP also requires reporting on annual TAP  
8 defaults within each written report.  
9

10 Please refer to PA-I-21.  
11

12 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-I-29.** IN EXCEL FORMAT, PLEASE PROVIDE BY YEAR FOR THE YEARS 2018  
2 TO PRESENT INCLUSIVE:  
3 A. AVERAGE NUMBER OF CONFIRMED LOW-INCOME CUSTOMERS.  
4 B. AVERAGE NUMBER OF ESTIMATED LOW-INCOME CUSTOMERS.

5  
6 FOR PURPOSES OF THIS AND OTHER QUESTIONS USING THIS TERM, A  
7 “CONFIRMED LOW-INCOME CUSTOMER” IS A CUSTOMER THAT PWD  
8 KNOWS, OR HAS REASON TO KNOW, IS A CUSTOMER WITH INCOME  
9 AT OR BELOW 150% OF THE FEDERAL POVERTY LEVEL.

10  
11 **RESPONSE:**

12 PWD does not have data formatted as described in the discovery request. Rather, PWD  
13 has data on historical TAP and Senior Citizen Discount program participation. Data on  
14 historical TAP participation since the beginning of the program can be found in the  
15 Monthly TAP Program Statistics report, included as PA-I-56, which was generated on  
16 February 1, 2023. Data on historical senior citizen discount bills can be found in Report  
17 1abc, which is provided as Schedule RFC-5 within PWD Statement No. 6.

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19 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**PA-I-30.** IN EXCEL FORMAT, PLEASE PROVIDE ALL COLLECTABILITY STUDIES  
PREPARED BY OR FOR PWD AND/OR WRB WITH DATA THROUGH  
DECEMBER 2022.

**RESPONSE:**

Please refer to PWD Statement 6 and PA-I-15 for all collectability studies.

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

1 **PA-I-31.** IN EXCEL FORMAT, PROVIDE A LIST OF EACH CENSUS BLOCK GROUP  
2 COMPRISING, IN WHOLE OR PART, THE PWD SERVICE TERRITORY.  
3

4 **RESPONSE:**

5 After reasonable investigation, no reports or documents have been identified that capture  
6 the information requested.  
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8 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau  
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1 **PA-I-32.** IN EXCEL FORMAT, PROVIDE A LIST OF EACH NINE DIGIT ZIP CODE  
2 COMPRISING, IN WHOLE OR PART, THE PWD SERVICE TERRITORY.  
3

4 **RESPONSE:**

5 Preparation of this response is in progress and will be provided in the future.  
6

7 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau  
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- 1 **PA-I-33.** IN EXCEL FORMAT, FOR EACH NINE DIGIT ZIP CODE IN PWD'S  
2 SERVICE TERRITORY, PROVIDE:  
3 A. THE NUMBER OF RESIDENTIAL CUSTOMERS IN THAT ZIP CODE;  
4 B. THE NUMBER OF CONFIRMED LOW-INCOME CUSTOMERS IN  
5 THAT ZIP CODE; AND  
6 C. THE NUMBER OF TAP PARTICIPANTS SERVED IN THAT ZIP CODE.  
7 D. THE NUMBER OF PARTICIPANTS IN PAYMENT ARRANGEMENTS  
8 AND/OR RATE DISCOUNTS, DISAGGREGATED BY TYPE OF  
9 PROGRAM.

10  
11 **RESPONSE:**

12 The requested data and reports were developed in response to questions asked by the  
13 Public Advocate. Rate Proceeding Participants should refer to PWD Statements 6 and 7  
14 for information regarding the data used as the basis for or in support of the development of  
15 the Water Department's proposed rates and charges and related matters.

16  
17 Attachment PA-I-33 includes a count of residential water accounts enrolled in service for  
18 each five-digit ZIP code, as well as counts of customers receiving assistance through TAP,  
19 senior citizen discount, or a payment agreement in the five-digit ZIP code. Nine-digit ZIP  
20 code data are unavailable. Water accounts are defined here as current general service  
21 residential (including TAP) and senior citizen discount water accounts in 'current' status  
22 as of the end of December 2022.

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24 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-I-34.** IN EXCEL FORMAT, FOR THE MOST RECENT 12 MONTH PERIOD  
2 AVAILABLE, PLEASE PROVIDE ANY INFORMATION THAT IS  
3 AVAILABLE THAT IS BROKEN DOWN BY CENSUS BLOCK GROUP, OR  
4 IF CENSUS BLOCK GROUP IS NOT AVAILABLE, BY NINE DIGIT ZIP  
5 CODE, REGARDING RESIDENTIAL CUSTOMERS':

- 6 A. AMOUNT OF BILLED REVENUE (IN DOLLARS) FOR CURRENT  
7 SERVICE;  
8 B. PAYMENTS (IN DOLLARS);  
9 C. ARREARS (IN DOLLARS);  
10 D. NUMBER OF BILLS RENDERED;  
11 E. NUMBER OF PAYMENTS RECEIVED;  
12 F. NUMBER OF ACCOUNTS WITH PAYMENTS MADE RESULTING IN  
13 A \$0 BALANCE AFTER THE PAYMENT;  
14 G. NUMBER OF ACCOUNTS IN ARREARS;  
15 H. NUMBER OF SHUTOFF NOTICES FOR NONPAYMENT;  
16 I. NUMBER OF NOTICES OF DEFECT ISSUED;  
17 J. NUMBER OF TERMINATIONS FOR NONPAYMENT;  
18 K. NUMBER OF TERMINATIONS FOR REASONS OTHER THAN  
19 NONPAYMENT  
20 L. NUMBER OF RECONNECTIONS.

21  
22 IF INFORMATION IS BROKEN DOWN BY MORE THAN ONE  
23 GEOGRAPHIC AREA, PROVIDE THAT INFORMATION WHICH IS  
24 AVAILABLE ON THE MOST GEOGRAPHICALLY DISAGGREGATED  
25 BASIS (E.G., CENSUS TRACT RATHER THAN ZIP CODE).

26  
27 **RESPONSE:**  
28

1 For available information, see response attachment PA-I-34 AR Aging by Postal Zone  
2 Report. After reasonable investigation, no reports were identified that capture the data  
3 requested in subsections (A), (B), and (D) through (H).  
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5 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-I-35.** IN EXCEL FORMAT, PLEASE PROVIDE DEPARTMENT ACCOUNTS  
2 RECEIVABLE AGING REPORTS BY MONTH FOR THE MOST RECENT 24  
3 MONTHS AVAILABLE, INCLUDING WITHIN EACH AGING BUCKET: (A)  
4 THE NUMBER OF ACCOUNTS; (B) THE DOLLARS OF RECEIVABLE; AND  
5 (C) THE AVERAGE BALANCE PER ACCOUNT. SEPARATELY INCLUDE  
6 THE TOTAL RECEIVABLES (IN DOLLARS) AND THE TOTAL NUMBERS  
7 OF ACCOUNTS WITH RECEIVABLES, FOR EACH MONTH.  
8 A. SEPARATELY PROVIDE FOR NON-RESIDENTIAL ACCOUNTS;  
9 B. SEPARATELY PROVIDE FOR RESIDENTIAL ACCOUNTS;  
10 C. SEPARATELY PROVIDED FOR TAP PARTICIPANT ACCOUNTS.  
11 D. SEPARATELY PROVIDED FOR PARTICIPANT ACCOUNTS IN  
12 PAYMENT ARRANGEMENTS AND/OR RATE DISCOUNTS,  
13 DISAGGREGATED BY TYPE OF PROGRAM.

14  
15 PLEASE INDICATE WHETHER THE DOLLARS AND/OR ACCOUNTS IN  
16 EACH AGING BUCKET ARE ADDITIVE (E.G., WHETHER THE TOTAL IS  
17 EQUAL TO THE SUM OF THE VARIOUS AGING BUCKETS USED).

18  
19 **RESPONSE:**

20 For available information, please see response attachment PA-I-35, Accounts Receivable  
21 Aging Reports from January 2021 through December 2022. After reasonable  
22 investigation, no reports were identified that capture data for “(c) the average balance per  
23 account.”  
24

25  
26 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
27  
28

1 **PA-I-36.** IN EXCEL FORMAT, PLEASE PROVIDE A USAGE DISTRIBUTION BY  
2 MONTH FOR THE MOST RECENT 24 MONTHS AVAILABLE, INCLUDING  
3 WITHIN EACH DISTRIBUTION RANGE: (A) THE NUMBER OF  
4 ACCOUNTS; (B) THE AGGREGATE CONSUMPTION WITHIN THAT  
5 RANGE; (C) THE AVERAGE CONSUMPTION WITHIN THAT RANGE; AND  
6 (D) THE AVERAGE BILL WITHIN THAT RANGE.  
7 A. SEPARATELY PROVIDE FOR RESIDENTIAL ACCOUNTS;  
8 B. SEPARATELY PROVIDE FOR TAP PARTICIPANT ACCOUNTS.  
9 C. SEPARATELY PROVIDED FOR PARTICIPANT ACCOUNTS IN NON-  
10 TAP PAYMENT ARRANGEMENTS AND/OR RATE DISCOUNTS,  
11 DISAGGREGATED BY TYPE OF PROGRAM.  
12

13 **RESPONSE:**

14 Please refer to PWD Statement No. 6, Schedule RFC-8 for reporting related to the number  
15 of accounts with consumption within various ranges and total consumption within those  
16 ranges for each month of FY22. Average consumption can be calculated from those  
17 numbers, and adopted rates applied. A parallel report for Senior Citizen Discount  
18 customers is provided as PA-I-36. Separate reporting does not exist for TAP participants  
19 or other participant accounts non-TAP payment arrangements and/or rate discounts.  
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21 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-I-37.** IN EXCEL FORMAT, PLEASE PROVIDE, BY YEAR FOR THE MOST  
2 THREE YEARS AVAILABLE, ALL COLLECTABILITY STUDIES  
3 ASSESSING THE RATE AT WHICH THE DEPARTMENT CONVERTS  
4 BILLINGS INTO COLLECTED REVENUE.

5 A. SEPARATELY PROVIDE FOR NON-RESIDENTIAL ACCOUNTS;

6 B. SEPARATELY PROVIDE FOR RESIDENTIAL ACCOUNTS;

7 C. SEPARATELY PROVIDE FOR TAP PARTICIPANT ACCOUNTS.  
8

9 **RESPONSE:**

10 The FY 2022 Payment Patterns report, included in Raftelis' direct testimony, PWD  
11 Statement No. 6, Schedule RFC-7, includes information on payments for both non-  
12 residential and residential accounts. Refer to attachment PA-I-15 for similar reporting on  
13 TAP and Senior Citizen Discount program accounts.  
14

15 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**PA-I-38.** PLEASE IDENTIFY EACH RESIDENTIAL CUSTOMER SERVICE FEE IMPOSED, INCLUDING ANY LATE PAYMENT CHARGE. SEPARATELY PROVIDE THE COST-JUSTIFICATION FOR SUCH FEE.

**RESPONSE:**

Miscellaneous charges related to lien fees, bad check fees and penalties for late payments are detailed in the table below.

Description	Justification	Fee Amount
Lien Fee	Filing Fee as mandated by 42 Pa. C.S. § 1725 et seq., 42 Pa. C.S. § 3733, 72 P.S. § 3172, and First Judicial District of Pennsylvania Administrative Order 2008-01	\$91.45
Dishonored Check Fee	Philadelphia Code Section 19-2809(7)(f)	\$20.00
Penalty for Late Payment	Penalty mandated by Philadelphia Code Section 19-1606(2).  (See next column for the relevant text of this section)	If current water or sewer rent charges are not paid within thirty (30) days after the due date of any bill, a penalty of 5% shall be imposed. Additional penalties shall be imposed and added to unpaid water or sewer rent charges, and their penalties, on the due date of the bill of each succeeding cycle, as follows: * * *  (.3) monthly cycles – 1/2 of 1%, except that a period of thirty (30) days shall elapse before the first additional penalty shall be imposed.



1 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

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1 **PA-I-39.** IN EXCEL FORMAT, FOR EACH RESIDENTIAL CUSTOMER FEE  
2 IDENTIFIED IN RESPONSE TO THE IMMEDIATELY PRECEDING  
3 QUESTION, PLEASE PROVIDE BY MONTH FOR THE MOST RECENT 24  
4 MONTHS AVAILABLE: (A) THE NUMBER OF ACCOUNTS BEING  
5 CHARGED THAT FEE; AND (B) THE AGGREGATE DOLLARS CHARGED  
6 FOR THAT FEE.

7

8 **RESPONSE:**

9 After reasonable investigation, no reports have been identified that capture the information  
10 requested.

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12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

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- 1 **PA-I-40.** IN EXCEL FORMAT, PLEASE PROVIDE BY MONTH FOR THE MOST  
2 RECENT 24 MONTHS AVAILABLE, THE NUMBER OF:
- 3 A. FINAL NOTICES OF TERMINATION FOR NONPAYMENT  
4 (DISAGGREGATING BY AND EXPLAINING IF DIFFERENT “FINAL”  
5 NOTICES ARE PROVIDED) FOR RESIDENTIAL CUSTOMERS;
  - 6 B. THE AVERAGE ARREARS FOR RESIDENTIAL ACCOUNTS  
7 RECEIVING FINAL NOTICES OF TERMINATION FOR  
8 NONPAYMENT;
  - 9 C. RESIDENTIAL TERMINATIONS FOR NONPAYMENT;
  - 10 D. THE AVERAGE ARREARS FOR RESIDENTIAL ACCOUNTS  
11 TERMINATED FOR NONPAYMENT;
  - 12 E. FINAL NOTICES OF TERMINATION FOR NONPAYMENT  
13 (DISAGGREGATING BY AND EXPLAINING IF DIFFERENT “FINAL”  
14 NOTICES ARE PROVIDED) FOR NON-RESIDENTIAL CUSTOMERS  
15 (DISTINGUISHING BETWEEN DIFFERENT TYPES OF “NON-  
16 RESIDENTIAL” CUSTOMERS IF SUCH DISTINCTIONS ARE MADE);
  - 17 F. THE AVERAGE ARREARS OF NON-RESIDENTIAL ACCOUNTS  
18 RECEIVING FINAL NOTICES OF TERMINATION FOR  
19 NONPAYMENT (DISTINGUISHING BETWEEN DIFFERENT TYPES  
20 OF “NON-RESIDENTIAL CUSTOMERS IF SUCH DISTINCTIONS ARE  
21 MADE);
  - 22 G. NON-RESIDENTIAL TERMINATIONS FOR NONPAYMENT  
23 (DISTINGUISHING BETWEEN DIFFERENT TYPES OF NON-  
24 RESIDENTIAL CUSTOMERS IF SUCH DISTINCTIONS ARE MADE);
  - 25 H. THE AVERAGE ARREARS OF NON-RESIDENTIAL ACCOUNTS  
26 TERMINATION FOR NONPAYMENT (DISTINGUISHING BETWEEN  
27 DIFFERENT TYPES OF NON-RESIDENTIAL CUSTOMERS IF SUCH  
28 DISTINCTIONS ARE MADE).

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**RESPONSE:**

Please see response attachment PA-I-40, Shutoff Notice Report from January 2021 through December 2022. After reasonable investigation, no reports have been identified that capture data for “(b) The average arrears for residential accounts receiving final notices of termination for nonpayment;” “(d) The average arrears for residential accounts terminated for nonpayment;” “(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);” and “The average arrears of non-residential accounts termination for nonpayment (distinguishing between different types of non-residential customers if such distinctions are made).

**RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

1 **PA-I-41.**

2 IN EXCEL FORMAT, OF THE RESIDENTIAL ACCOUNTS RECEIVING A  
3 NOTICE OF AN IMPENDING TERMINATION FOR NONPAYMENT, FOR  
4 EACH MONTH FOR THE MOST RECENT 24 MONTHS AVAILABLE,  
5 PLEASE PROVIDE:

6 (A) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR  
7 SERVICE TERMINATED BY THE

8 (B) DATE SPECIFIED IN THE TERMINATION NOTICE;

9 (C) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR  
10 SERVICE TERMINATED FOR NONPAYMENT AFTER RECEIVING A  
11 TERMINATION NOTICE FOR NONPAYMENT THAT VOLUNTARILY  
12 TERMINATED THEIR ACCOUNTS;

13 (D) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR  
14 SERVICE TERMINATED BECAUSE THE CUSTOMER PAID THEIR  
15 BILLS IN FULL PRIOR TO THEIR SCHEDULED TERMINATION;

16 (E) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR  
17 SERVICE TERMINATED BECAUSE THE CUSTOMER PAID THEIR  
18 BILLS LESS THAN IN FULL BUT SUFFICIENT TO AVOID THEIR  
19 SCHEDULED TERMINATION;

20 (F) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR  
21 SERVICE TERMINATED DUE TO A MEDICAL HOLD BEING PLACED  
22 ON THE ACCOUNT

23 (G) THE TOTAL NUMBER OF ACCOUNTS THAT DID NOT HAVE THEIR  
24 SERVICE TERMINATED EVEN THOUGH THEY RETAINED AN  
25 ARREARS THAT WAS SUFFICIENT LARGE (OR SUFFICIENTLY  
26 OLD) TO TRIGGER A TERMINATION); AND

27 (H) THE TOTAL NUMBER OF ACCOUNTS ON WHICH ACCOUNT NO  
28 PAYMENTS WERE MADE PRIOR TO THE ISSUANCE OF THE NEXT  
BILL AFTER ISSUANCE OF THE TERMINATION NOTICE.

1 (I) THE TOTAL NUMBER OF PROPERTIES RECEIVING A  
2 TERMINATION NOTICE THAT SUBSEQUENTLY REQUESTED A TAP  
3 APPLICATION WITHIN THE FOLLOWING 3 MONTHS

4 (J) THE TOTAL NUMBER OF PROPERTIES RECEIVING A  
5 TERMINATION NOTICE THAT SUBSEQUENTLY SUBMITTED  
6 EITHER A TENANT APPLICATION OR OCCUPANT APPLICATION,  
7 DISAGGREGATED BY TYPE OF APPLICATION AND BY WHETHER  
8 SERVICE WAS ACTUALLY TERMINATED.

9  
10 **RESPONSE:**

11 After reasonable investigation, no reports have been identified that capture the information  
12 requested.

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14 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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**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.

**RESPONSE:**

Preparation of this response is in progress and will be provided in the future.

**RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

1 **PA-I-43.** IN EXCEL FORMAT, FOR THE MOST RECENT 24-MONTH PERIOD  
2 AVAILABLE, BY MONTH FOR RESIDENTIAL ACCOUNTS, PLEASE  
3 PROVIDE:

- 4 A. WHAT PERCENTAGE OF BILLS WAS PAID BY THE DUE DATE OF  
5 THE BILL;  
6 B. WHAT PERCENTAGE OF BILLS WAS PAID BY THE TIME THE NEXT  
7 MONTH'S BILL IS RENDERED;  
8 C. WHAT PERCENTAGE OF THOSE BILLS WAS PAID BY THE TIME  
9 THE SECOND SUBSEQUENT BILL IS RENDERED; AND  
10 D. WHAT PERCENTAGE OF THOSE BILLS WAS PAID BY THE TIME  
11 THE THIRD SUBSEQUENT BILL IS RENDERED.  
12

13 **RESPONSE:**

14 See response attachment PA-I-43 Payment Pattern Report.  
15

16 Note that the attached report providing collection percentages of billings relative to due  
17 dates is not used as the basis of collections for the cost of service study. As noted in the  
18 response to PA-I-17 and PA-I-18, the collection factors used in the cost of service study  
19 provide collections on a fiscal year basis in terms of the "billing year," "billing year plus  
20 1," and "billing year plus 2 and beyond."  
21

22 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Black & Veatch  
23 Management Consulting, LLC.  
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1 **PA-I-44.** IN A TYPICAL MONTH, WITH DAY 1 BEING THE DAY A BILL IS ISSUED,  
2 PLEASE PROVIDE THE PERCENTAGE OF RESIDENTIAL ACCOUNTS  
3 MAKING PAYMENTS BY DAY THROUGH DAY 60. IF REPORTING OF  
4 SUCH DATA IS ONLY BY A TIME PERIOD OTHER THAN A DAY (E.G.,  
5 WEEKLY), PROVIDE BY THE REPORTING BY THAT TIME PERIOD.  
6

7 **RESPONSE:**

8 After reasonable investigation, no reports have been identified that capture the information  
9 requested. Therefore, see response PA-I-43 Payment Pattern Report.  
10

11 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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- 1 **PA-I-45.** IN EXCEL FORMAT, PLEASE PROVIDE BY MONTH FOR EACH MONTH  
2 FOR THE MOST RECENT 24 MONTHS AVAILABLE:  
3 A. THE AVERAGE BILL FOR ALL RESIDENTIAL ACCOUNTS;  
4 B. THE AVERAGE ARREARS OF RESIDENTIAL ACCOUNTS IN  
5 ARREARS;  
6 C. THE AVERAGE BILL OF RESIDENTIAL ACCOUNTS IN ARREARS;  
7 D. THE TOTAL DOLLARS OF RESIDENTIAL ARREARS;  
8 E. THE PERCENTAGE OF RESIDENTIAL DOLLARS CONSTITUTING  
9 ARREARS;  
10 F. THE PERCENTAGE OF BILLED RESIDENTIAL ACCOUNTS HAVING  
11 ARREARS; AND  
12 G. THE AVERAGE ARREARS OF ALL RESIDENTIAL ACCOUNTS  
13 TERMINATED FOR NONPAYMENT IN THAT MONTH.

14  
15 **RESPONSE:**

16 After reasonable investigation, no reports have been identified that capture the information  
17 requested.

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19 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-I-46.** PLEASE PROVIDE A COPY OF A TYPICAL RESIDENTIAL NOTICE OF  
2 TERMINATION FOR NONPAYMENT PRINTED IN EACH OF THE  
3 FOLLOWING MONTHS:

- 4 A. AUGUST 2022.  
5 B. NOVEMBER 2022;  
6 C. JANUARY 2023.

7  
8 IF MORE THAN ONE TYPE OF RESIDENTIAL TERMINATION NOTICE IS  
9 ISSUED, PROVIDE A COPY OF EACH.

10  
11 **RESPONSE:**

- 12 A. Please see response attachment PA-I-46 Shutoff Notice.  
13 B. No residential shutoff notices were sent in November 2022.  
14 C. No residential shutoff notices were sent in January 2023.

15  
16 Beginning in June 2022, residential service termination notices for non-payment were sent  
17 for the first time since 2019. There is only one type of notice.

18  
19 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-I-47.** PLEASE PROVIDE A DETAILED DESCRIPTION OF ALL NOTICES OF  
2 DELINQUENCY OR POTENTIAL COLLECTION ACTIONS PROVIDED TO  
3 RESIDENTIAL CUSTOMERS DURING THE PERIOD OF TIME IN WHICH  
4 PWD/WRB WAS NOT TERMINATING ACCOUNTS FOR NONPAYMENT.  
5 SEPARATELY PROVIDE A COPY OF EACH SUCH NOTICE PROVIDED TO  
6 RESIDENTIAL CUSTOMERS DURING THIS TIME.

7  
8 **RESPONSE:**

9 Preparation of this response is in progress and will be provided in the future.

10  
11 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau

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- 1 **PA-I-48.** IN EXCEL FORMAT, FOR EACH MONTH FOR THE MOST RECENT  
2 TWELVE MONTHS AVAILABLE, PLEASE PROVIDE:  
3 A. THE AVERAGE BILL FOR RESIDENTIAL ACCOUNTS AT EXISTING  
4 RATES PROVIDED IN SUFFICIENT DETAIL (INCLUDING ALL INPUT  
5 VARIABLES) TO PERMIT REPLICATION.  
6 B. THE SAME BILL INFORMATION USING THE PROPOSED RATES  
7 RATHER THAN THE EXISTING RATES.  
8

9 **RESPONSE:**

10 Please refer to response attachment PA-I-48.xls. The response attachment serves as the  
11 basis for *Schedule BV-1: Table C-4*.

12  
13 See also, PWD *Statement 6 – Direct Testimony of Raftelis Financial Consultants, Inc:*  
14 *Schedule RFC-9, “Typical Residential Customer Usage”* Memorandum, during FY 2022,  
15 the typical residential customer utilizes between 4 to 5 CCF (or 400 to 500 cubic feet) of  
16 water per month. The majority of residential customers have 5/8” meter service.  
17

18 The estimated bill impacts for residential customers, with 5/8” meters, using 4 or 5 CCF  
19 are presented in *Schedule BV-1: Table C-4*.

20  
21 For purposes of estimating typical bill impacts for residential customers, the median  
22 monthly usage for the last two fiscal years (FY 2022 and FY 2021) of 4.5 CCF was  
23 utilized.  
24

25 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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**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.

**RESPONSE:**

See response attachment PA-I-49 Late Fee Report.

**RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

1 **PA-I-50.** PLEASE PROVIDE AN EXPLANATION AND A DETAILED DESCRIPTION  
2 OF HOW RESIDENTIAL LATE FEES ARE ALLOCATED IN THE PWD  
3 COST-OF-SERVICE STUDY.  
4

5 **RESPONSE:**

6 For the purposes of this response, we assume “late fees” refer to penalties on past due  
7 customer bills.  
8

9 Revenues associated with late fees (i.e. penalties) are included as Other Operating  
10 Revenue as presented on Line 11 of *Schedule BV-1: Table C-1A* and further detailed in  
11 *Table C-3 of PWD Statement 7- Direct Testimony of Black & Veatch*. As discussed in  
12 *Section 1.4.1 of Schedule BV-2: Water and Wastewater Cost of Service Report*, penalties  
13 are estimated based upon the average of actual penalties as a percentage of billings for FY  
14 2020 and FY 2022. This is done on a system-wide basis and not estimated by customer  
15 type.  
16

17 For the purposes of the cost of service analysis, and as presented in Schedule BV-2, as  
18 rates are established on a system wide basis, other operating revenues (including penalties)  
19 reduce the overall annual cost of service to be derived from rates. Refer to Tables 4-2 and  
20 7-2. As noted on page 7-26 of Schedule BV-2, since virtually all of the Other Operating  
21 Revenue is generated from Retail Customers, no credit is applicable to wholesale service.  
22 Refer to cost of service models provided or PWD Exhibit 6 page 871 (WCOS WOMAllo-  
23 16, Line 29) and pages 668 to 669 (SCOS SOMAllo-54, Column 5) for the allocation of  
24 Other Operating Revenue to retail service customers.  
25

26 This approach is consistent with prior rate proceedings.  
27

28 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC

1 **PA-I-51.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE RATEMAKING  
2 TREATMENT OF LATE FEE REVENUE.  
3

4 **RESPONSE:**

5 The Water Department's rates and charges are developed using the cost of service analysis  
6 described in *Schedule BV-2: Water and Wastewater Cost of Service Report*.  
7

8 Please refer to the response to PA-I-50. As noted, late fee revenues are incorporated into  
9 the Cost of Service Analysis and reduce the overall annual cost of service to be derived  
10 from rates.  
11

12 This approach is consistent with prior rate proceedings.  
13

14 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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**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.

**RESPONSE:**

After reasonable investigation, no reports have been identified that capture the information requested.

**RESPONSE PROVIDED BY:** City of Philadelphia

1 **PA-I-53.** PLEASE PROVIDE ALL WRITTEN STUDIES CURRENTLY WITHIN PWD'S  
2 CUSTODY OR CONTROL, WHETHER OR NOT PREPARED BY OR FOR  
3 THE PWD, THAT EXPLICITLY ASSESS THE EXTENT TO WHICH THE  
4 FOLLOWING ACTIVITIES REDUCE RESIDENTIAL BAD DEBT:

- 5 A. DEFERRED PAYMENT AGREEMENTS;
- 6 B. TERMINATIONS FOR NONPAYMENT;
- 7 C. LATE PAYMENT CHARGES;
- 8 D. ISSUANCE OF TERMINATION NOTICE;
- 9 E. LIENS;
- 10 F. SEQUESTRATION ACTIONS; AND
- 11 G. DEBT COLLECTION ACTIONS.

12  
13 **RESPONSE:**

14 After reasonable investigation, no reports have been identified that capture the information  
15 requested.

16  
17 **RESPONSE PROVIDED BY:** City of Philadelphia  
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1 **PA-I-54.** PLEASE PROVIDE ALL WRITTEN STUDIES CURRENTLY WITHIN PWD'S  
2 CUSTODY OR CONTROL, WHETHER OR NOT PREPARED BY OR FOR  
3 PWD, THAT EXPLICITLY ASSESS THE EXTENT TO WHICH THE  
4 FOLLOWING ACTIVITIES REDUCE RESIDENTIAL ARREARS:

- 5 A. DEFERRED PAYMENT AGREEMENTS;
- 6 B. TERMINATIONS FOR NONPAYMENT;
- 7 C. LATE PAYMENT CHARGES.
- 8 D. ISSUANCE OF TERMINATION NOTICE;
- 9 E. LIENS;
- 10 F. SEQUESTRATION ACTIONS; AND
- 11 G. DEBT COLLECTION ACTIONS.

12  
13 **RESPONSE:**

14 After reasonable investigation, no reports have been identified that capture the information  
15 requested.

16  
17 **RESPONSE PROVIDED BY:** City of Philadelphia  
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1 **PA-I-55.** PLEASE PROVIDE A COPY OF ALL REPORTS, EVALUATIONS, MEMOS,  
2 ANALYSES OR OTHER WRITTEN DOCUMENTS OF ANY NATURE  
3 PREPARED SINCE JANUARY 2015 ESTABLISHING PERFORMANCE  
4 INDICATOR TARGETS TO BE MET WITHIN THE NEXT YEAR AFTER  
5 PUBLICATION OF THE PERFORMANCE TARGETS; WITHIN THE NEXT  
6 TWO YEARS AFTER PUBLICATION OF THE PERFORMANCE TARGETS;  
7 OR WITHIN THE NEXT THREE YEARS AFTER PUBLICATION OF THE  
8 PERFORMANCE TARGETS, WITH RESPECT TO:  
9 A. DEBT PREVENTION;  
10 B. DEBT MANAGEMENT;  
11 C. THE TREATMENT OF VULNERABLE CUSTOMERS;  
12 D. CUSTOMER SATISFACTION.

13  
14 **RESPONSE:**

15 After reasonable investigation, no reports have been identified that capture the information  
16 requested.

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18 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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- 1 **PA-I-56.** IN EXCEL FORMAT, PLEASE PROVIDE, BY MONTH SINCE JULY 2018:  
2  
3 A. THE NUMBER OF NEW TAP NEW ENROLLEES (DEFINING A “NEW”  
4 ENROLLEE AS BEING A CUSTOMER WHO IS NOT CURRENTLY A  
5 TAP PARTICIPANT AND WHO IS APPLYING TO ENROLL IN THE  
6 PROGRAM).  
7 B. THE TOTAL NUMBER OF TAP PARTICIPANTS.  
8 C. THE NUMBER OF TAP NEW ENROLLEES HAD PREPROGRAM  
9 ARREARS AT THE TIME OF ENROLLMENT.  
10 D. THE AGGREGATE DOLLARS OF PREPROGRAM ARREARS FOR TAP  
11 NEW ENROLLEES AT THE TIME OF ENROLLMENT.  
12 E. THE AVERAGE DOLLAR AMOUNT OF PREPROGRAM ARREARS  
13 FOR TAP NEW ENROLLEES AT THE TIME OF ENROLLMENT.  
14 F. THE NUMBER OF TAP BILLS ISSUED IN THAT MONTH.  
15 G. THE DOLLARS OF TAP BILLS ISSUED IN THAT MONTH.  
16 H. THE DOLLARS OF TAP CREDITS / DISCOUNTS (I.E., THE  
17 DIFFERENCE BETWEEN THE TAP BILL AND BILLS AT STANDARD  
18 RESIDENTIAL RATES) IN THAT MONTH.  
19 I. THE NUMBER OF TAP PAYMENTS IN THAT MONTH.  
20 J. THE DOLLARS OF TAP PAYMENTS IN THAT MONTH.  
21 K. THE NUMBER OF TAP FULL AND ON-TIME PAYMENTS IN THAT  
22 MONTH.  
23 L. THE NUMBER OF TAP ACCOUNTS IN ARREARS IN THAT MONTH  
24 (EXCLUDING ARREARS THAT ARE SOLELY PREPROGRAM  
25 ARREARS).  
26 M. THE DOLLARS OF ARREARS ON TAP ACCOUNTS IN THAT MONTH  
27 (EXCLUDING ARREARS THAT ARE SOLELY PREPROGRAM  
28 ARREARS).

1 **RESPONSE:**

2 The report attached as PA-I-56, is intended to answer the questions posed by PA-I-56.  
3 Data are shown by calendar month as requested. Data for July 2017 through January 2023  
4 are provided. A synopsis of data in the columns is provided below.

5  
6 **Synopsis of Columns**

7 **(a) New TAP Enrollees**

8 The number of applications approved for a TAP plan through the new application  
9 workflow and reporting software Customer Application Management Program (CAMP).  
10 This number includes all applications that were approved for TAP, regardless of the  
11 application's current status. If an applicant was approved for a plan in CAMP more than  
12 once, the most recent approval was used.

13  
14 **(c) Number of TAP New Enrollees Having Preprogram Arrears at the Time of  
15 Enrollment**

16 The number of applications approved for a TAP plan as described in part (a) above with  
17 arrears, defined as account balance, at the time of approval greater than \$0, as recorded  
18 from Basis2 at the time of enrollment. Note that this excludes any balances that were in  
19 dispute or bankruptcy at the time of approval.

20  
21 **(d) Aggregate Dollars of Preprogram Arrears for TAP New Enrollees at the Time of  
22 Enrollment**

23 The total dollar amount of arrears, defined as account balance, as defined in part (c) above.  
24 This excludes any balances that were in dispute or bankruptcy at the time of approval.

25  
26 **(b) Total TAP Participants**

27 The number of customers that were issued a TAP bill during the calendar month in  
28 question. Customers issued more than one TAP bill during a calendar month were counted

1 once. Customers not issued a TAP bill during a calendar month were not counted for the  
2 month in question. Note that depending on a customer's billing cycle, a customer enrolled  
3 in one month (counted in (a) above) is included in this number in the month in which  
4 receive their first bill, which may not be the same month that customer is enrolled.

5  
6 **(e) Number of TAP Bills Issued**

7 The number of TAP bills issued to customers in item (b). Each TAP bill for a customer is  
8 counted. If a customer were issued more than one TAP bill during a calendar month, each  
9 bill is counted. Bills that have subsequently been reversed are not included.

10  
11 **(f) Dollars of TAP Bills Issued**

12 The total dollar amount of TAP bills counted in item (e).

13  
14 **(g) Dollars of TAP Credits/Discounts**

15 The total dollar amount of TAP discounts associated with TAP bills counted in (e) and (f)  
16 is summed in this item.

17  
18 **(h) Number of TAP Payments**

19 During the calendar month, the count of distinct credits (payments) that are allocated to  
20 (that is, pay off) debits associated with TAP bills issued at any time. If more than one  
21 payment was made against a bill, each is counted.

22  
23 **(i) Dollars of TAP Payments**

24 During the calendar month, the total dollar amount of credits (payments) allocated to (that  
25 is, pay off) debits associated with TAP bills issued at any time.

26  
27 **(j) Number of TAP In-Full and On-Time Payments**

28 The number of payments allocated during the calendar month to debit lines associated

1 with TAP bills within 30 days of the date the bill was issued which bring the balance of  
2 the bill to \$0.

3  
4 **(k) Number of Participants With TAP Balance Aged X-Y days**

5 The number of participants with at least one TAP bill bearing an unpaid balance with an  
6 age within the indicated range. The ranges provided are:

- 7 · Number of Participants With TAP Balance Aged 0-30 days  
8 · Number of Participants With TAP Balance Aged 31-60 days  
9 · Number of Participants With TAP Balance Aged 61-90 days  
10 · Number of Participants With TAP Balance Aged 91-120 days  
11 · Number of Participants With TAP Balance Aged 121+ days

12 An unpaid balance was determined as the total dollar amount of the account's TAP bills  
13 minus the sum of all payments made against the bills prior to the creation date of the most  
14 recent TAP bill issued during the month in question. As described under item (h), a  
15 payment was determined as a credit allocated to a debit line associated with a TAP bill.

16 The age of the unpaid balance was determined as the number of elapsed days between the  
17 creation date of the bill in question and the creation date of the most recent TAP bill  
18 issued during the calendar month in question.

19 Note that a TAP bill that is issued with a negative total is not counted as bearing a balance  
20 aged 0-30 days. Such bills will be included in the counts and sums in items (e) and (f).

21 **(l) Dollars of TAP Balance Aged X-Y days**

22 The total dollar amount of unpaid balances of TAP bills identified as described in part (k)  
23 above. The ranges provided are:

- 24 · Dollars of TAP Balance Aged 0-30 days  
25 · Dollars of TAP Balance Aged 31-60 days  
26 · Dollars of TAP Balance Aged 61-90 days  
27 · Dollars of TAP Balance Aged 91-120 days  
28 · Dollars of TAP Balance Aged 121+ days



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**(m) Number of TAP Participants Having Preprogram Arrears at the Time of Enrollment**

This is the count of TAP Participants (distinct account keys issued a bill during the month in question as determined for “(b) Total TAP Participants”) that had Arrears > 0 at the time of enrollment (as determined for “(c) Number of TAP New Enrollees Having Preprogram Arrears at the Time of Enrollment”).

**(n) Aggregate Dollars of Preprogram Arrears for TAP Participants at the Time of Enrollment**

This is the sum of arrears of enrollees identified in (a).

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

1 **PA-I-57.** IN EXCEL FORMAT, PLEASE PROVIDE BY MONTH SINCE JULY 2018 A  
2 DISTRIBUTION, IN BANDS OF \$50, OF PREPROGRAM ARREARS ON THE  
3 ACCOUNTS OF TAP PARTICIPANTS NEWLY ENROLLED IN THAT  
4 MONTH.

5  
6 **RESPONSE:**

7 Refer to the attached spreadsheet PA-I-57. This report shows the distribution of pre-  
8 program arrears for TAP enrollees at the time of their enrollment per month. Data are  
9 shown by calendar month as requested. Data for July 2018 through December 2022 are  
10 provided. “Pre-program arrears” is defined as the total account balance of a customer at  
11 the time of their enrollment in the TAP. Note that this excludes any balances that were in  
12 dispute or bankruptcy at the time of approval. Only the most recent enrollment for an  
13 application is counted towards the pre-program arrears totals. For the pre-program arrears  
14 bands, the lower limit of an arrears band is inclusive, and the upper limit is exclusive. For  
15 instance, applications that are approved with a pre-TAP account balance of \$0.00 are  
16 counted in the \$0.00-\$50.00 band, and not in the \$-50.00-\$0.00 band.

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18 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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- 1 **PA-I-58.** IN EXCEL FORMAT, PLEASE PROVIDE, BY MONTH SINCE JULY 2018:  
2 A. THE NUMBER OF NOTICES OF TERMINATION FOR NONPAYMENT  
3 ISSUED TO TAP PARTICIPANTS.  
4 B. THE NUMBER OF TAP PARTICIPANT ACCOUNTS THAT WERE  
5 TERMINATED FOR NONPAYMENT.  
6 C. THE AVERAGE ARREARS OF TAP PARTICIPANT ACCOUNTS AT  
7 THE TIME OF TERMINATION FOR NONPAYMENT (EXCLUDING  
8 ARREARS PRE-EXISTING AT THE TIME OF TAP ENROLLMENT).  
9 D. THE AGGREGATE DOLLARS OF TAP PARTICIPANT ACCOUNTS AT  
10 THE TIME OF TERMINATION (EXCLUDING ARREARS PRE-  
11 EXISTING AT THE TIME OF TAP ENROLLMENT).  
12 E. THE NUMBER OF TAP ACCOUNTS THAT WERE TERMINATED  
13 WHO WERE SUBSEQUENTLY RECONNECTED.  
14

15 **RESPONSE:**

16 The attached report PA-I-58 responds to PA-I-58 parts (a) and (b) by providing the  
17 number of shut-off notices issued to TAP participants and the number of TAP participants  
18 shut off for nonpayment. Reporting does not exist to address (c) through (e).  
19

20 **Synopsis of Columns**

21 **(a) Notices of Shut Off for Nonpayment Issued to TAP Participants**

22 The number of shut-off notice letters issued in Basis2 to customers during participation in  
23 the TAP program. Included in this count are first and second shutoff notices. A customer  
24 was defined as a TAP participant if that customer was issued a TAP bill during the month  
25 of the shut-off notice. During the month of a customer's first TAP bill, the customer is  
26 considered a participant as of the date the bill was issued. Where a customer was issued  
27 more than one shut-off notice, each notice is counted separately.  
28

1           **(b) TAP Participant Accounts That Were Shut Off for Nonpayment**

2           The number of water customers in Basis2 for which a shut-off work order was completed  
3           while that customer was a participant in the TAP program. A customer was defined as a  
4           TAP participant if that customer was issued a TAP bill during the month of the shut-off.  
5           During the month of a customer's first TAP bill, the customer is considered a participant  
6           as of the date the bill was issued.

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8           **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-I-59.** IN EXCEL FORMAT, PLEASE PROVIDE BY MONTH SINCE JANUARY  
2 2017:

- 3 A. THE NUMBER OF BUDGETED PWD AND/OR WRB STAFF  
4 POSITIONS DEVOTED EXCLUSIVELY TO THE OPERATION OF  
5 CUSTOMER ASSISTANCE PROGRAMS.
- 6 B. THE NUMBER OF ACTUAL PWD AND/OR WRB STAFF POSITIONS  
7 DEVOTED EXCLUSIVELY TO THE OPERATION OF CUSTOMER  
8 ASSISTANCE PROGRAMS.
- 9 C. THE NUMBER OF BUDGETED PWD AND/OR WRB STAFF  
10 POSITIONS WHOSE TIME IS DEVOTED PARTIALLY TO THE  
11 OPERATION OF CUSTOMER ASSISTANCE PROGRAMS, INCLUDING  
12 AN IDENTIFICATION FOR EACH POSITION OF THE PORTION OF  
13 TIME DEVOTED TO CUSTOMER ASSISTANCE PROGRAMS.
- 14 D. THE NUMBER OF ACTUAL PWD AND/OR WRB STAFF POSITIONS  
15 WHOSE TIME IS DEVOTED PARTIALLY TO THE OPERATION OF  
16 CUSTOMER ASSISTANCE PROGRAMS, INCLUDING AN  
17 IDENTIFICATION FOR EACH POSITION OF THE PORTION OF TIME  
18 DEVOTED TO CUSTOMER ASSISTANCE PROGRAMS.

19  
20 **RESPONSE:**

21 Preparation of this response is in progress and will be provided when available.  
22

23 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
24  
25  
26  
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28

1 **PA-I-60.** PLEASE PROVIDE A COPY OF ALL THIRD PARTY CONTRACTS WITH  
2 AN ENTITY OUTSIDE PWD ENTERED INTO SINCE JANUARY 2017:

3 A. REGARDING INFORMATION TECHNOLOGY DEVOTED  
4 EXCLUSIVELY TO CUSTOMER ASSISTANCE PROGRAMS AND/OR  
5 TAP.

6 B. REGARDING OUTREACH DEVOTED EXCLUSIVELY TO CUSTOMER  
7 ASSISTANCE PROGRAMS AND/OR TAP.

8 C. REGARDING ELIGIBILITY VERIFICATION DEVOTED  
9 EXCLUSIVELY TO CUSTOMER ASSISTANCE PROGRAMS AND/OR  
10 TAP.

11 D. REGARDING INTAKE DEVOTED EXCLUSIVELY TO CUSTOMER  
12 ASSISTANCE PROGRAMS AND/OR TAP (IF DIFFERENT FROM "C")  
13 (EXPLAIN THE DIFFERENCE, IF ANY).

14  
15 **RESPONSE:**

16 Preparation of this response is in progress and will be provided in the future.  
17

18 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau  
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1 **PA-I-61.** IN EXCEL FORMAT, PLEASE PROVIDE BY MONTH FOR EACH MONTH  
2 JULY 2018 TO PRESENT, A DISTRIBUTION OF THE NUMBER OF  
3 RESIDENTIAL ACCOUNTS IN ARREARS BY THE SIZE OF ARREARS BY  
4 THE FOLLOWING BANDS: (1) \$0; (2) \$1 - \$100; (3) \$101 - \$200; (4) \$201 -  
5 \$300; (5) \$301 - \$500; (6) \$501 - \$750; (7) \$751 - \$1,000; (8) \$1,001 - \$2,000;  
6 AND (9) \$2,001 AND ABOVE. IF THESE BANDS ARE NOT AVAILABLE,  
7 PLEASE PROVIDE THE NUMBERS OF ACCOUNTS BY WHICH BANDS  
8 ARE AVAILABLE.

9  
10 **RESPONSE:**

11 Please see attachment PA-I-61 for a monthly distribution of the number of residential  
12 accounts by the level of arrears. Residential accounts are defined as general service  
13 residential (including TAP) and senior citizen discount water accounts which were billed  
14 for service in the preceding month. Arrears for each account were calculated by  
15 subtracting the amount of the most recent month's bill from each account's overall  
16 balance. This represents debt that is past due. The accounts counted may have debt in  
17 payment agreements, bankruptcy, or other protected statuses. Only accounts with arrears  
18 are included in these results.

19  
20 Arrearages are in bands of above \$0 - \$100; above \$100 - \$200; above \$200 - \$300; above  
21 \$300 - \$500; above \$500 - \$750; above \$750 - \$1,000; above \$1,000 - \$2,000; and above  
22 \$2,000.

23  
24 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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26  
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28

1 **PA-I-62.** IN EXCEL FORMAT, SEPARATELY PROVIDE THE SAME DATA  
2 REQUESTED IN THE IMMEDIATELY PRECEDING DATA REQUEST FOR  
3 TAP PARTICIPANTS (EXCLUDING PREPROGRAM ARREARS).  
4

5 **RESPONSE:**

6 Please see attachment PA-I-62 for a distribution of TAP Participants by the level of  
7 arrears. See PA-I-61 for general definitions.  
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9 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-I-63.** PLEASE PROVIDE ALL WRITTEN STUDIES CURRENTLY WITHIN THE  
2 CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED BY OR  
3 FOR PWD, THAT EXPLICITLY ASSESS THE RELATIONSHIP BETWEEN  
4 THE NUMBER OF, OR RATE AT WHICH, THE PWD ISSUES  
5 TERMINATION NOTICES AND THE REDUCTION OF RESIDENTIAL BAD  
6 DEBT.

7  
8 **RESPONSE:**

9 After reasonable investigation, no reports have been identified that capture the information  
10 requested.

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12 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau  
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1 **PA-I-64.** PLEASE PROVIDE ALL WRITTEN STUDIES CURRENTLY WITHIN THE  
2 CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED BY OR  
3 FOR PWD, THAT EXPLICITLY ASSESS THE RELATIONSHIP BETWEEN  
4 THE NUMBER OF, OR RATE AT WHICH, PWD ISSUES TERMINATION  
5 NOTICES AND THE REDUCTION OF RESIDENTIAL ARREARS.  
6

7 **RESPONSE:**

8 After reasonable investigation, no reports have been identified that capture the information  
9 requested.  
10

11 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau  
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1 **PA-I-65.** IN EXCEL FORMAT, PLEASE IDENTIFY ANY CLUSTERS OF ENGLISH AS  
2 A SECOND LANGUAGE (“ESL”) CUSTOMERS THAT EXIST IN THE PWD  
3 SERVICE TERRITORY BY COMMUNITY, ZIP CODE, CENSUS TRACT, OR  
4 OTHER GEOGRAPHIC REGION OR AREA BY WHICH ESL IS TRACKED.  
5 SEPARATELY PROVIDE A DETAILED EXPLANATION OF HOW  
6 CLUSTERS OF ESL CUSTOMERS ARE IDENTIFIED.  
7

8 **RESPONSE:**

9 After reasonable investigation, no reports have been identified that capture the information  
10 requested.  
11

12 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-I-66.**

PLEASE PROVIDE A DETAILED DESCRIPTION OF:

- 2 A. THE TRANSLATION SERVICES AVAILABLE WHEN A PERSON  
3 CONTACTS PWD AND/OR WRB THROUGH AN AUTOMATED OR  
4 INTERACTIVE TELEPHONE SYSTEM.
- 5 B. THE TRANSLATION SERVICES AVAILABLE WHEN A PERSON  
6 CONTACTS PWD AND/OR WRB THROUGH A HUMAN  
7 INTERACTION.
- 8 C. THE TRANSLATION SERVICES AVAILABLE WHEN A PERSON  
9 CONTACTS PWD AND/OR WRB THROUGH A WEB-BASED SYSTEM.
- 10 D. HOW A PERSON ACCESSES THE TRANSLATION SERVICE WHEN A  
11 PERSON CONTACTS PWD AND/OR WRB THROUGH AN  
12 AUTOMATED OR INTERACTIVE TELEPHONE SYSTEM.
- 13 E. HOW A PERSON ACCESSES THE TRANSLATION SERVICE WHEN A  
14 PERSON CONTACTS PWD AND/OR WRB THROUGH A HUMAN  
15 INTERACTION.
- 16 F. HOW A PERSON ACCESSES THE TRANSLATIONS SERVICE WHEN  
17 A PERSON CONTACTS PWD AND/OR WRB THROUGH A WEB-  
18 BASED SYSTEM.

19  
20 **RESPONSE:**

- 21 A. When a customer contacts PWD and/or WRB through an automated or interactive  
22 telephone system, such as our water emergency hotline at 215-685-6300, they have  
23 the option to request language access services through telephonic interpretation that  
24 is provided by United Language Group (ULG). Language access services can be  
25 obtained upon request through PWD's water emergency hotline at 215-685-6300 or  
26 by email at [waterinfo@phila.gov](mailto:waterinfo@phila.gov).
- 27 B. PWD field staff have language access tip cards and language lists where they can  
28 provide services for limited English proficient customers, upon request.

- 1 C. Language access services can be obtained upon request through PWD's water  
2 emergency hotline at 215-685-6300 or by email at [waterinfo@phila.gov](mailto:waterinfo@phila.gov).
- 3 D. When a customer contacts PWD and/or WRB through an automated or interactive  
4 telephone system, such as our water emergency hotline at 215-685-6300, they have  
5 the option to request language access services through telephonic interpretation that  
6 is provided by United Language Group (ULG).
- 7 E. PWD staff have access to language access services through tip cards and language  
8 lists that allow services to be provided to limited English proficient customers upon  
9 request. Referrals to the PWD's language access coordinators can also be made to  
10 obtain services.
- 11 F. Language access services can be obtained upon request through PWD's water  
12 emergency hotline at 215-685-6300 or by email at [waterinfo@phila.gov](mailto:waterinfo@phila.gov).

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14 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-I-67.** PLEASE PROVIDE A DETAILED DESCRIPTION OF HOW TRANSLATIONS  
2 OF WRITTEN DOCUMENTS PROVIDED TO CUSTOMERS ARE PROVIDED  
3 FOR:

- 4 A. CREDIT AND COLLECTION ACTIVITIES (INCLUDING BUT NOT  
5 LIMITED TO SHUTOFF NOTICES).  
6 B. TAP OUTREACH.  
7 C. DEFERRED PAYMENT PLANS.

8  
9 INCLUDED WITHIN THESE EXPLANATIONS, PROVIDE A DETAILED  
10 EXPLANATION OF THE LANGUAGES PROVIDED, HOW THE CHOICE OF  
11 LANGUAGES IS MADE, AND HOW THE WRITTEN DOCUMENTS IN  
12 DIFFERENT LANGUAGES ARE DISTRIBUTED.

13  
14 **RESPONSE:**

- 15 A. Preparation of this response is in progress and will be provided in the future.  
16 B. The PWD Communications and Engagement Division uses the latest language-  
17 specific Census map to determine the appropriate language(s) for TAP outreach  
18 translations. Document translation can also be accomplished upon request. In  
19 addition, the Office of Immigrant Affairs (OIA), has provided a list of the 10 most  
20 frequently requested languages during interactions with City agencies. We distribute  
21 translated documents at community meetings and tabling events and also share the  
22 following link with our partners to increase distribution of translated documents  
23 [https://www.phila.gov/documents/water-bill-customer-assistance-application-and-  
25 documents/](https://www.phila.gov/documents/water-bill-customer-assistance-application-and-<br/>24 documents/).  
26 C. Preparation of this response is in progress and will be provided in the future.

27 The language access plans are available at:

28 <https://www.phila.gov/documents/language-access-plans/>

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**RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau

1 **PA-I-68.** IN EXCEL FORMAT, FOR EACH FISCAL YEAR 2019 TO PRESENT  
2 INCLUSIVE, PLEASE PROVIDE BOTH THE NUMBER AND PERCENTAGE  
3 OF PAYMENTS RECEIVED FROM RESIDENTIAL CUSTOMERS VIA THE  
4 FOLLOWING PAYMENT CHANNELS: MAIL, ONLINE, AUTO DEBIT,  
5 CREDIT/DEBIT CARD, PAYMENT AGENTS, OTHER.  
6

7 **RESPONSE:**

8 See response attachment PA-I-68 Payment Channel Number Report. Please note that from  
9 fiscal year 2017 through December 31, 2020, credit/debit card payments were not reported  
10 separately, but as part of online payments.  
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12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-I-69.** IN EXCEL FORMAT, PLEASE PROVIDE THE SAME DATA AS  
2 PRESENTED IMMEDIATELY ABOVE EXCEPT IN DOLLAR TERMS  
3 RATHER THAN IN TERMS OF NUMBER OF PAYMENTS.  
4

5 **RESPONSE:**

6 See response attachment PA-I-69 Payment Channel Dollar Report. Please note that from  
7 fiscal year 2017 through December 31, 2020, credit/debit card payments were not reported  
8 separately, but as part of online payments.  
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10 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-I-70.** IN EXCEL FORMAT, FOR EACH FISCAL YEAR, 2019 TO PRESENT  
2 INCLUSIVE, PLEASE PROVIDE BOTH THE NUMBER AND PERCENTAGE  
3 OF PAYMENTS RECEIVED FROM RESIDENTIAL CUSTOMERS VIA THE  
4 FOLLOWING PAYMENT MECHANISMS: CASH, CHECK, DEBIT CARD,  
5 CREDIT CARD, ACH CREDIT, ACH DEBIT, PREPAID EBT CARDS,  
6 MOBILE APP.

7  
8 **RESPONSE:**

9 See response attachment PA-I-70 Payment Type Number Report.

10  
11 Payments made through “MyPhillyWaterBill,” our electronic payment website operated  
12 by Kubra, are captured in the following entries: ACH, ECK, IVR, and WEB. Payments  
13 from collection agencies could have been made via any method the agency allows, but we  
14 do not receive information about those payment methods.

15  
16

Payment Type	Definition
ACH	Automated Clearing House (wire transfer) includes all wire transfer transactions and is not broken down into debit or credit.
ALL1	Alliance One (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods
ECK	Electronic Check payment via City's web-based payment portal including but not limited to the Mobile App
IVR	Interactive Voice Response (payment by phone) includes credit/debit card and prepaid EBT card payments but cannot be broken down into those categories
OTHER	Sheriff Sale payments, Field Service Representative collected payments, and bulk receipts.
PENN	Penn Credit (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods

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PHILADELPHIA WATER DEPARTMENT  
Response to PA Interrogatory

<b>POS</b>	Point of Sale (in person payment) includes cash, check, money order, credit/debit card, and prepaid EBT card payments but cannot be broken down into those categories
<b>RCB</b>	Revenue Collection Bureau (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods
<b>REMITPRO</b>	Mailed-in checks and money orders.
<b>WEB</b>	Payment via the City's web-based payment portal, including but not limited to the Mobile App, includes credit/debit card and prepaid EBT card payments but cannot be broken down into those categories
<b>ZC</b>	ZipCheck, automated direct debit via PNC Bank
<b>ZP</b>	ZipPhone, automated bank debit from customer's bank and/or third party pay station

**RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

1 **PA-I-71.** IN EXCEL FORMAT, PLEASE PROVIDE THE SAME DATA AS  
2 PRESENTED IMMEDIATELY ABOVE EXCEPT IN DOLLAR TERMS  
3 RATHER THAN IN TERMS OF NUMBER OF PAYMENTS.  
4

5 **RESPONSE:**

6 See response attachment PA-I-71 Payment Type Dollar Report. Payments made through  
7 “MyPhillyWaterBill,” our electronic payment website operated by Kubra, are captured in  
8 the following entries: ACH, ECK, IVR, and WEB. Payments from collection agencies  
9 could have been made via any method the agency allows, but we do not receive  
10 information about those payment methods.  
11

<b>Payment Type</b>	<b>Definition</b>
<b>ACH</b>	Automated Clearing House (wire transfer) includes all wire transfer transactions and is not broken down into debit or credit.
<b>ALL1</b>	Alliance One (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods
<b>ECK</b>	Electronic Check payment via City's web-based payment portal including but not limited to the Mobile App
<b>IVR</b>	Interactive Voice Response (payment by phone) includes credit/debit card and prepaid EBT card payments but cannot be broken down into those categories
<b>OTHER</b>	Sheriff Sale payments, Field Service Representative collected payments, and bulk receipts.
<b>PENN</b>	Penn Credit (collection agency) payments may be made via any method the agency allows, but we do not receive information about those payment methods
<b>POS</b>	Point of Sale (in person payment) includes cash, check, money order, credit/debit card, and prepaid EBT card payments but cannot be broken down into those categories
<b>RCB</b>	Revenue Collection Bureau (collection agency) payments may be made via any method the agency

	allows, but we do not receive information about those payment methods
<b>REMITPRO</b>	Mailed-in checks and money orders.
<b>WEB</b>	Payment via the City's web-based payment portal, including but not limited to the Mobile App, includes credit/debit card and prepaid EBT card payments but cannot be broken down into those categories
<b>ZC</b>	ZipCheck, automated direct debit via PNC Bank
<b>ZP</b>	ZipPhone, automated bank debit from customer's bank and/or third party pay station

**RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

1 **PA-I-72.** IN EXCEL FORMAT, FOR EACH FISCAL YEAR 2019 TO PRESENT  
2 INCLUSIVE, PLEASE PROVIDE THE DOLLARS OF REVENUE  
3 GENERATED FROM RESIDENTIAL CUSTOMERS THROUGH ANY FEE  
4 IMPOSED FOR DEBIT/CREDIT CARD TRANSACTIONS. SEPARATELY  
5 DESIGNATED THE LEVEL OF THAT FEE PER TRANSACTION. PROVIDE  
6 THE TARIFF PAGE SETTING FORTH THE LEVEL OF THAT FEE.

7  
8 **RESPONSE:**

9 There is no City revenue generated from residential customers through the fee for  
10 debit/credit card transactions as the fee is collected by and for the City's third-party  
11 vendor in the amount of \$2.95 for online credit card transactions and \$3.95 for in-person  
12 credit card transactions. There is no report that captures the data requested in this  
13 interrogatory.

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15 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-I-73.** IF THE RESPONSE TO THE QUESTION IMMEDIATELY ABOVE IS NOT  
2 THE PRODUCT OF THE NUMBER OF PAYMENTS IDENTIFIED ABOVE  
3 TIMES THE PER TRANSACTION FEE, PLEASE PROVIDE AN  
4 EXPLANATION OF WHY NOT.

5

6 **RESPONSE:**

7 Please see response to PA-I-72.

8

9 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

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1 **PA-I-74.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE RATEMAKING  
2 TREATMENT OF THE REVENUE DERIVED FROM THE FEES IMPOSED  
3 FOR DEBIT/CREDIT CARD PAYMENTS.  
4

5 **RESPONSE:**

6 There is no revenue generated for fees for debit/credit card payments as the fee is  
7 collected by and for the City's third-party vendor. Therefore, revenues from these fees are  
8 not included in the cost of service analysis.  
9

10 **RESPONSE PROVIDED BY:** Philadelphia Water Department, Water Revenue Bureau and  
11 Black & Veatch Management Consulting, LLC  
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1 **PA-I-75.** PLEASE PROVIDE A DETAILED COST BASIS FOR THE RESIDENTIAL  
2 FEE FOR CREDIT AND DEBIT CARD TRANSACTIONS.

3

4 **RESPONSE:**

5 The transaction fee is governed by the terms of the contract with the vendor. Additionally,  
6 please see response to PA-I-72.

7

8 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

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1 **PA-I-76.** IN EXCEL FORMAT, FOR EACH MONTH FISCAL YEAR 2018 TO PRESENT  
2 (2023 YEAR TO DATE), PLEASE PROVIDE:

- 3 A. THE NUMBER OF CUSTOMERS WHO WERE DEFAULTED FROM  
4 TAP;
- 5 B. OF THE NUMBER OF CUSTOMERS WHO WERE DEFAULTED FROM  
6 TAP, THE NUMBER WHO WERE DEFAULTED FROM TAP FOR  
7 HAVING BEEN FOUND TO BE NO LONGER INCOME-ELIGIBLE AT  
8 THE TIME OF RECERTIFICATION
- 9 C. OF THE NUMBER OF CUSTOMERS WHO WERE DEFAULTED FROM  
10 TAP, THE NUMBER WHO WERE DEFAULTED FROM TAP FOR  
11 PROVIDING INCOMPLETE RESIDENCY INFORMATION;
- 12 D. OF THE NUMBER OF CUSTOMERS WHO WERE DEFAULTED FROM  
13 TAP, THE NUMBER WHO WERE DEFAULTED FROM TAP FOR  
14 PROVIDING INCOMPLETE INCOME INFORMATION;
- 15 E. OF THE NUMBER OF CUSTOMERS WHO WERE DEFAULTED FROM  
16 TAP, THE NUMBER WHO WERE DEFAULTED FOR FAILING TO  
17 ENGAGE IN THE RECERTIFICATION/REVERIFICATION PROCESS;
- 18 F. OF THE NUMBER OF CUSTOMERS WHO WERE DEFAULTED FROM  
19 TAP, THE NUMBER WHO WERE DEFAULTED FOR SOME OTHER  
20 REASON (SPECIFYING EACH REASON JUSTIFYING THE DEFAULT).  
21

22 **RESPONSE:**

23 Attachment PA-I-76 reports the number of TAP customers who defaulted from TAP and  
24 the reasons for their defaults on a monthly basis.

25 Customers may default from TAP for several reasons including:

26 - Application was denied for one of the following reasons:

- 27 ○ Failed to meet Income and Residency Guidelines  
28 ○ Failed to meet Income Guidelines

- 1           ○ Failed to meet Residency Guidelines
- 2           ○ Failed to Recertify
- 3           ○ Incomplete Income Information
- 4           ○ Incomplete Residency Information
- 5           ○ Installation Type Not Eligible for TAP
- 6           ○ Missing information on application form
- 7           ○ Not the Customer applying
- 8           ○ Data was transferred to a newer application for processing
- 9           ○ The customer's Regular Bill was better

10           Please note that customers can default from TAP for a combination of incomplete income  
11           and residency information, and the rows Incomplete Income Information and Incomplete  
12           Residency Information contains the number of customers who defaulted for having  
13           incomplete income or residency information respectively, and so each may include some  
14           of the same customers if those customers had both forms of incomplete information. As a  
15           result, the total number of defaults may not be equal to the sum of the column.

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

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1 **PA-I-77.** PLEASE PROVIDE:

2 A. A DETAILED EXPLANATION OF THE PURPOSE OF HAVING A TAP  
3 PARTICIPANT CONFIRM THEIR RESIDENCY GIVEN THEIR ACTIVE  
4 CUSTOMER STATUS AND THEIR ACTIVE TAP PARTICIPATION  
5 STATUS.

6 B. SEPARATELY PROVIDE A DETAILED DESCRIPTION OF ALL WAYS  
7 IN WHICH AN ACTIVE TAP PARTICIPANT MAY NO LONGER BE A  
8 RESIDENT AT THE ADDRESS WHERE THEY ARE TAKING PWD  
9 SERVICE.

10  
11 **RESPONSE:**

12 A. TAP participants are required to confirm and provide proof of residency during both  
13 the initial application process and the recertification process in order to confirm the  
14 customer is occupying the service location.

15 B. This explanation would require the Department to have information on the  
16 circumstances and thought processes of our customers that we do not possess.

17  
18 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-I-78.** PLEASE PROVIDE:

2 A. A DETAILED EXPLANATION OF THE PURPOSE OF HAVING A TAP  
3 PARTICIPANT CONFIRM THEIR RESIDENCY GIVEN THEIR ACTIVE  
4 CUSTOMER STATUS AND THEIR ACTIVE TAP PARTICIPATION  
5 STATUS.

6 B. SEPARATELY PROVIDE A DETAILED DESCRIPTION OF ALL WAYS  
7 IN WHICH AN ACTIVE TAP PARTICIPANT MAY NO LONGER BE A  
8 RESIDENT AT THE ADDRESS WHERE THEY ARE TAKING PWD  
9 SERVICE.

10  
11 **RESPONSE:**

12 A. TAP participants are required to confirm and provide proof of residency during both  
13 the initial application process and the recertification process in order to confirm the  
14 customer is occupying the service location.

15 B. This explanation would require the Department to have information on the  
16 circumstances and thought processes of our customers that we do not possess.

17  
18 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-I-79.** PLEASE PROVIDE A SINGLE COPY OF THE MOST RECENT LANGUAGE  
2 ACCESS PLAN SUBMITTED BY PWD TO THE CITY OF PHILADELPHIA.  
3 SEPARATELY PROVIDE A COPY OF THE MOST RECENT LANGUAGE  
4 ACCESS PLAN SUBMITTED BY WRB TO THE CITY OF PHILADELPHIA.

5  
6 **RESPONSE:**

7 The latest language access plans are available here:

8 <https://www.phila.gov/documents/language-access-plans/>

9  
10 PWD: [https://www.phila.gov/media/20220322124938/LANGUAGE-ACCESS-PLAN-](https://www.phila.gov/media/20220322124938/LANGUAGE-ACCESS-PLAN-MARCH-2022_FINAL-Signed.pdf)  
11 [MARCH-2022\\_FINAL-Signed.pdf](https://www.phila.gov/media/20220322124938/LANGUAGE-ACCESS-PLAN-MARCH-2022_FINAL-Signed.pdf)

12  
13 Department of Revenue: [https://www.phila.gov/media/20210422124220/Revenue-](https://www.phila.gov/media/20210422124220/Revenue-language-access-plan-April-2021.pdf)  
14 [language-access-plan-April-2021.pdf](https://www.phila.gov/media/20210422124220/Revenue-language-access-plan-April-2021.pdf)

15  
16 Both plans are provided in response attachment PA-I-79. Please also see response PA-I-  
17 67.

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19 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau  
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1 **PA-I-80.** PLEASE PROVIDE A SINGLE COPY OF ANY REPORT, EVALUATION,  
2 STUDY OR OTHER WRITTEN DOCUMENT OF ANY NATURE, WITHIN  
3 THE CUSTODY OR CONTROL OF PWD, WHETHER OR NOT PREPARED  
4 BY OR FOR PWD, DATED WITHIN THE PAST FIVE YEARS,  
5 IDENTIFYING, EVALUATING OR OTHERWISE DISCUSSING WHY  
6 NONPAYING RESIDENTIAL CUSTOMERS DO NOT MAKE CONTACT  
7 WITH THE UTILITY WHEN, IN RESPONSE TO BILL NONPAYMENT,  
8 THOSE NONPAYING CUSTOMERS RECEIVE A REQUEST OR NOTICE TO  
9 CONTACT A UTILITY TO AVOID THE TERMINATION OF SERVICE.

10  
11 **RESPONSE:**

12 After reasonable investigation, no reports have been identified that capture the information  
13 requested.

14  
15 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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**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.

**RESPONSE:**

After reasonable investigation, no reports have been identified that capture the information requested.

**RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau



1 **PA-I-82.** PLEASE PROVIDE, DATED WITHIN THE PAST FIVE YEARS, A COPY OF  
2 ALL REPORTS, EVALUATIONS, MEMOS, ANALYSES OR OTHER  
3 WRITTEN DOCUMENTS OF ANY NATURE CONTAINING ANY PWD  
4 METHODOLOGY, PROCEDURE OR PROCESS DESIGNED TO  
5 SYSTEMATICALLY REVIEW, STUDY OR ASSESS PWD RESIDENTIAL  
6 BILLING AND/OR PAYMENT RECORDS IN AN EFFORT TO:  
7 A. CHARACTERIZE PATTERNS OF NONPAYMENT;  
8 B. IDENTIFY THE CHARACTERISTICS OF NONPAYERS;  
9 C. IDENTIFY PREDICTORS OF NONPAYMENT;  
10 D. IDENTIFY STRATEGIES TO REDUCE NONPAYMENT;  
11 E. IDENTIFY EARLY INDICATORS OF NONPAYMENT.  
12

13 **RESPONSE:**

14 Refer to the response to PA-I-30 for information responsive to section (a) of this discovery  
15 request. After reasonable investigation, no additional reports have been identified that  
16 capture the other information requested.  
17

18 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-I-83.** PLEASE PROVIDE A DETAILED EXPLANATION OF ALL SHUTOFF  
2 PROTECTIONS PROVIDED TO LOW-INCOME OR OTHER VULNERABLE  
3 HOUSEHOLDS.  
4

5 **RESPONSE:**

6 Preparation of this response is in progress and will be provided in the future.  
7

8 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau  
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1 **PA-I-84.** PLEASE PROVIDE A DETAILED DESCRIPTION OF ALL WAYS IN WHICH  
2 SHUTOFF PROTECTIONS DIFFER DEPENDING ON WHETHER THE  
3 RESIDENT OF THE HOME IS:

- 4 A. THE HOMEOWNER;
- 5 B. A TENANT-CUSTOMER;
- 6 C. AN OCCUPANT-CUSTOMER;
- 7 D. A NON-CUSTOMER TENANT; OR
- 8 E. A NON-CUSTOMER OCCUPANT.

9  
10 FOR EACH SUCH DIFFERENCE IN SHUTOFF PROTECTION IDENTIFIED,  
11 PROVIDE A CITATION TO THE PWD/WRB REGULATION WHICH  
12 AUTHORIZES THE DIFFERENT TREATMENT.

13  
14 **RESPONSE:**

15 Preparation of this response is in progress and will be provided in the future.

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17 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau  
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1 **PA-I-85.** IN EXCEL FORMAT, PLEASE PROVIDE BY MONTH FROM JANUARY  
2 2022 TO THE PRESENT, THE NUMBER OF:

- 3 A. RESIDENTIAL CUSTOMERS WHO PWD HAD IDENTIFIED AS BEING  
4 PROTECTED FROM NONPAYMENT TERMINATIONS DUE TO THEIR  
5 LOW-INCOME OR VULNERABLE STATUS;  
6 B. THE NUMBER OF LOW-INCOME AND/OR VULNERABLE  
7 CUSTOMERS WHOSE ACCOUNTS WERE TERMINATED FOR  
8 NONPAYMENT.

9  
10 **RESPONSE:**

- 11 A. As of June 2022, when the City first completed its identification of residential  
12 customers as low-income or of a vulnerable population to protect from service  
13 termination due to nonpayment, there were 107,119 customers protected.  
14 B. Customers identified above were protected from termination for nonpayment.

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16 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-I-86.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE PWD AND/OR  
2 WRB PROCESS FOR DETERMINING WHETHER AND/OR WHEN IT IS  
3 APPROPRIATE TO TERMINATE A RESIDENTIAL ACCOUNT FOR  
4 NONPAYMENT NOTWITHSTANDING THE CUSTOMER'S STATUS AS A  
5 LOW-INCOME AND/OR VULNERABLE CUSTOMER.  
6

7 **RESPONSE:**

8 The City's current policy is not to terminate residential accounts where the customer has  
9 been determined to be in a low-income and/or vulnerable group according to other City  
10 administrative data.  
11

12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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**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.

**RESPONSE:**

Refer to the response to PA-I-86.

**RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

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**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.

**RESPONSE:**

Preparation of this response is in progress and will be provided in the future.

**RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau