

**RESPONSE TO**  
**PUBLIC ADVOCATE'S INTERROGATORIES (SET II)**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**QUESTIONS 1-72**

**Dated: February 2023**

1 **PA-II-1.** PLEASE PROVIDE, IN AN ACTIVE EXCEL SPREADSHEET, THE BASIS  
2 FOR AN AVERAGE RESIDENTIAL CONSUMPTION OF 4.5 CCF/MONTH.  
3 SEPARATELY INDICATE WHAT DIFFERENCES HAVE ARISEN  
4 INDICATING A REDUCED AVERAGE CONSUMPTION SINCE PWD'S  
5 IMMEDIATELY PRECEDING BASE RATE PROCEEDING.  
6

7 **RESPONSE:**

8 Please refer to PWD Statement No. 6, Schedules RFC-8 and RFC-9 for reporting regarding  
9 the residential consumption, and memo describing the 4.5 CCF/month typical value. The  
10 data from FY22, as compared to FY21 data indicate that the median monthly residential  
11 consumption value decreased from 5 CCF to 4 CCF in August, December, February, and  
12 April during the respective fiscal years.  
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14 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**PA-II-2.** IN AN ACTIVE EXCEL SPREADSHEET, PLEASE PROVIDE BY MONTH FOR THE MOST RECENT 24 MONTHS AVAILABLE, THE NUMBER OF PARTICIPANTS ON THE SENIOR DISCOUNT.

**RESPONSE:**

This information is included in attachment PA-I-25\_E1.

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

- 1 **PA-II-3.** IN AN ACTIVE EXCEL SPREADSHEET, PLEASE PROVIDE BY MONTH  
2 FOR THE MOST RECENT 24 MONTHS AVAILABLE, THE:  
3 A. MEAN DISCOUNTED BILL OF CUSTOMERS RECEIVING THE  
4 SENIOR DISCOUNT;  
5 B. MEDIAN DISCOUNTED BILL OF CUSTOMERS RECEIVING THE  
6 SENIOR DISCOUNT;  
7 C. MEAN NON-DISCOUNTED BILL OF CUSTOMERS RECEIVING THE  
8 SENIOR DISCOUNT;  
9 D. MEDIAN NON-DISCOUNTED BILL OF CUSTOMERS RECEIVING  
10 THE SENIOR DISCOUNT.

11  
12 **RESPONSE:**

13 The information requested can be calculated from Senior Citizen Discount consumption  
14 and charges data provided in PA-I-36.

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16 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-II-4.** IN AN ACTIVE EXCEL SPREADSHEET, PLEASE PROVIDE, BY YEAR,  
2 FOR THE MOST RECENT TWO YEARS AVAILABLE:

3 A. THE MEAN INCOME OF CUSTOMERS RECEIVING THE SENIOR  
4 DISCOUNT;

5 B. THE MEDIAN INCOME OF CUSTOMERS RECEIVING THE SENIOR  
6 DISCOUNT.

7

8 **RESPONSE:**

9 The response to this question is provided as attachment PA-II-4.

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

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1 **PA-II-5.** PLEASE PROVIDE, IN AN ACTIVE EXCEL SPREADSHEET, BY MONTH  
2 FOR THE MOST RECENT 24 MONTHS AVAILABLE, THE NUMBER OF  
3 CUSTOMERS RECEIVING THE SENIOR DISCOUNT WHO ARE NOT TAP  
4 PARTICIPANTS BECAUSE:

- 5 A. EVEN THOUGH THEY ARE INCOME-ELIGIBLE, THEIR  
6 PERCENTAGE OF INCOME PWD BURDEN IS INSUFFICIENTLY  
7 HIGH FOR THE CUSTOMER TO BENEFIT FROM TAP;  
8 B. THEY ARE NOT INCOME ELIGIBLE FOR TAP;  
9 C. THEY PROVIDED A TAP APPLICATION THAT HAD INCOMPLETE  
10 INCOME INFORMATION;  
11 D. THEY PROVIDED A TAP APPLICATION THAT HAD INCOMPLETE  
12 RESIDENCE INFORMATION;  
13 E. THEY PROVIDED A TAP APPLICATION THAT WAS INCOMPLETE  
14 FOR REASONS OTHER THAN INCOME OR RESIDENCE  
15 INFORMATION;  
16 F. SOME OTHER REASON (SPECIFYING THE "OTHER REASON").  
17

18 **RESPONSE:**

19 Attachment PA-II-5 counts applications of existing senior citizen discount customers who  
20 applied for but were denied enrollment in TAP. Please note that applications can be denied  
21 enrollment in TAP for a combination of incomplete income and residency information,  
22 and the rows Incomplete Income Information and Incomplete Residency Information  
23 contains the number of customers who defaulted for having incomplete income or  
24 residency information respectively, and so each may include some of the same customers  
25 if those customers had both forms of incomplete information. As a result, the total number  
26 of denials may not be equal to the sum of the column.  
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1 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-II-6.** PLEASE PROVIDE PWD'S PROPOSED LOW-INCOME WATER  
2 CONSERVATION BUDGET:  
3 A. FOR THE MOST RECENT THREE YEARS;  
4 B. THE PROJECTED NEXT THREE YEARS.

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6 **RESPONSE:**

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

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

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1 **PA-II-7.** FOR PWD'S WATER CONSERVATION BUDGET, PLEASE PROVIDE A  
2 DETAILED EXPLANATION OF THE IMPACT OF INFLATION ON:

- 3 A. THE PER JOB COST OF WATER CONSERVATION MEASURES;  
4 B. THE NUMBER OF JOBS COMPLETED BY YEAR IN THE PAST YEAR;  
5 C. THE NUMBER OF JOBS PROJECTED TO BE COMPLETED IN THE  
6 NEXT TWO YEARS;  
7 D. THE TOTAL BUDGET;  
8 E. THE MEASURES INSTALLED FOR EACH JOB.  
9

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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1 **PA-II-8.** IN AN ACTIVE EXCEL SPREADSHEET, BY MONTH FOR THE MOST  
2 RECENT THREE YEARS AVAILABLE, PLEASE PROVIDE:

- 3 A. THE NUMBER OF RESIDENTIAL CUSTOMERS THAT WERE “OVER-  
4 METERED.”
- 5 B. THE NUMBER OF SENIOR DISCOUNT CUSTOMERS WHO WERE  
6 “OVER-METERED.”
- 7 C. THE NUMBER OF TAP RECIPIENTS WHO WERE “OVER-METERED.”
- 8 D. THE NUMBER OF CUSTOMERS FOUND TO BE “OVER-METERED”  
9 WHO WERE HOMEOWNERS;
- 10 E. THE NUMBER OF CUSTOMERS FOUND TO BE “OVER-METERED”  
11 WHO WERE TENANTS;
- 12 F. THE NUMBER OF CUSTOMERS FOUND TO BE “OVER-METERED”  
13 WHO WERE OCCUPANTS.

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15 **RESPONSE:**

16 The term “over-metered” is a term that appears in Temporary Transitional Provisions of PWD  
17 regulations (Section 2.1(d)). This is not a term that PWD or WRB uses to describe customers  
18 generally, and refers to a small subset of PWD customers on a temporary, transitional basis.  
19 After reasonable investigation, no reports have been identified that capture the information  
20 requested.

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22 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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- PA-II-9.** IN AN ACTIVE EXCEL SPREADSHEET, BY MONTH FOR THE MOST RECENT THREE YEARS AVAILABLE, PLEASE PROVIDE:
- A. THE TOTAL NUMBER OF APPLICATIONS OF OVER-METERED CUSTOMERS;
  - B. THE TOTAL NUMBER OF APPLICATIONS OF OVER-METERED CUSTOMERS WHO WERE HOMEOWNERS;
  - C. THE TOTAL NUMBER OF APPLICATIONS OF OVER-METERED CUSTOMERS WHO WERE TENANTS;
  - D. THE TOTAL NUMBER OF APPLICATIONS OF OVER-METERED CUSTOMERS WHO WERE OCCUPANTS.

**RESPONSE:**

See response to PA-II-8.

**RESPONSE PROVIDED BY:** Philadelphia Water Department

1 **PA-II-10.** IN AN ACTIVE EXCEL SPREADSHEET, BY MONTH FOR THE MOST  
2 RECENT THREE YEARS AVAILABLE, PLEASE PROVIDE:

- 3 A. THE NUMBER OF APPLICATIONS OF OVER-METERED  
4 CUSTOMERS THAT WERE DENIED, DISAGGREGATED BY REASON  
5 FOR THE DENIAL;  
6 B. THE NUMBER OF APPLICATIONS OF OVER-METERED  
7 CUSTOMERS THAT WERE HOMEOWNERS, THAT WERE DENIED,  
8 DISAGGREGATED BY REASON FOR THE DENIAL;  
9 C. THE NUMBER OF APPLICATIONS OF OVER-METERED  
10 CUSTOMERS THAT WERE TENANTS, THAT WERE DENIED,  
11 DISAGGREGATED BY REASON FOR THE DENIAL;  
12 D. THE NUMBER OF APPLICATIONS OF OVER-METERED  
13 CUSTOMERS THAT WERE TENANTS, THAT WERE DENIED,  
14 DISAGGREGATED BY REASON FOR THE DENIAL.

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16 **RESPONSE:**

17 See response to PA-II-8.  
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19 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-II-11.** IN AN ACTIVE EXCEL SPREADSHEET, BY MONTH FOR THE MOST  
2 RECENT THREE YEARS AVAILABLE, PLEASE PROVIDE:

- 3 A. THE NUMBER OF APPLICATIONS OF OVER-METERED  
4 CUSTOMERS THAT WERE APPROVED;
- 5 B. THE NUMBER OF APPLICATIONS OF OVER-METERED  
6 CUSTOMERS THAT WERE HOMEOWNERS, THAT WERE  
7 APPROVED;
- 8 C. THE NUMBER OF APPLICATIONS OF OVER-METERED  
9 CUSTOMERS THAT WERE TENANTS, THAT WERE APPROVED;
- 10 D. THE NUMBER OF APPLICATIONS OF OVER-METERED  
11 CUSTOMERS THAT WERE TENANTS, THAT WERE APPROVED.  
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13 **RESPONSE:**

14 See response to PA-II-8.  
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16 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-II-12.** REFERENCE PROPOSED RATES AND CHARGES AT SECTION 6.4:

2 PLEASE PROVIDE:

3 A. THE COST BASIS FOR THE \$75 PER VISIT (6.4(A)).

4 B. THE COST BASIS FOR THE \$75 TERMINATION CHARGE  
5 (6.4(C)(1)(I)).  
6

7 **RESPONSE:**

8 Please refer to Schedule BV-4: WP-4 MISCELLANEOUS FEES METHODOLOGY  
9 including the workpapers included in Appendix A.  
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11 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-13.** REFERENCE PROPOSED RATES AND CHARGES AT SECTION 6.4:  
2 PLEASE PROVIDE A DETAILED EXPLANATION OF WHEN THE \$75  
3 CHARGE BECOMES DUE. FOR EXAMPLE, DOES THE \$75 CHARGE  
4 BECOME DUE AT THE TIME OF THE TERMINATION OR AT THE TIME  
5 OF THE RECONNECTION (OR AT SOME OTHER TIME).  
6

7 **RESPONSE:**

8 The \$75 charge per Section 6.4(a) is assessed to a non-TAP customer when PWD performs  
9 a site visit to shut off service for non-payment.  
10

11 The \$75 charge per Section 6.4(b) is assessed to a non-TAP customer when PWD performs  
12 a site visit to shut off service as a result of non-compliance with a Notice of Defect and/or  
13 metering non-compliance.  
14

15 The \$75 charge per Section 6.4(c)(1)(i) is assessed to a non-TAP customer when PWD  
16 performs a site visit to restore a terminated service for service lines 2” and smaller where  
17 the only work required is operating the service valve.  
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19 All bills are due when rendered.  
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21 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-II-14.** IN AN ACTIVE EXCEL SPREADSHEET, BY YEAR FOR EACH YEAR  
2 FISCAL YEAR 2017 TO FISCAL YEAR 2022: PLEASE PROVIDE A  
3 RESTATEMENT OF RFC-7 (NON-STORMWATER ONLY) FOR:  
4 A. RESIDENTIAL CUSTOMERS NOT ON A CUSTOMER ASSISTANCE  
5 PROGRAM;  
6 B. TAP-ONLY CUSTOMERS;  
7 C. LOW-INCOME CUSTOMERS WHO ARE NOT TAP PARTICIPANTS;  
8 D. SENIOR CITIZEN DISCOUNT RECIPIENTS;  
9 E. ALL OTHER CUSTOMER ASSISTANCE PROGRAM RECIPIENTS.

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11 **RESPONSE:**

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

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15 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-II-15.** BY YEAR FOR EACH FISCAL YEAR FOR WHICH TAP-R REVENUE WAS  
2 COLLECTED, PLEASE PROVIDE THE COLLECTABILITY FACTOR  
3 APPLIED TO TAP-R BILLINGS.  
4

5 **RESPONSE:**

6 Due to the data structure within basis2, for both water and sewer, the base charge and the  
7 TAP rate rider rate are combined in water and sewer quantity charge rates as stated in  
8 PWD's Rates and Charges. As such, the collectability factor cannot be assessed  
9 separately.  
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11 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-II-16.** BY YEAR FOR EACH FISCAL YEAR FOR WHICH TAP-R REVENUE WAS  
2 COLLECTED, PLEASE PROVIDE FOR TAP-R BILLINGS:  
3 A. THE DOLLARS OF BILLING OF TAP-R REVENUE;  
4 B. THE DOLLARS OF RECEIPTS OF TAP-R REVENUE.  
5

6 **RESPONSE:**

7 Due to the data structure within basis2, for both water and sewer, the base charge and the  
8 rate rider are combined in water and sewer quantity charge rates as stated in PWD's Rates  
9 and Charges. As such, separate reporting does not exist on TAP-R billings or receipts.  
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11 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-II-17.** BY YEAR FOR EACH FISCAL YEAR FOR WHICH TAP-R REVENUE WAS  
2 COLLECTED, PLEASE PROVIDE, FOR TAP-R BILLINGS, WHAT THE TAP-  
3 R RECEIPTS WOULD HAVE BEEN HAD THE COLLECTABILITY FACTOR  
4 FOR TAP-R BILLINGS BEEN:

- 5 A. 100%;
- 6 B. 96%;
- 7 C. 95%
- 8 D. 90%

9  
10 **RESPONSE:**

11 See response to PA-II-15.

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

1 **PA-II-18.** PREFERENCE PROPOSED RATES AND CHARGES SECTION 6.3: PLEASE  
2 PROVIDE:

- 3 A. A DEFINITION OF WHAT CONSTITUTES “TAMPERING.”
- 4 B. A DETAILED EXPLANATION OF WHAT INFORMATION IS  
5 SUFFICIENT TO “INDICATE” TAMPERING HAS OCCURRED;
- 6 C. A COPY OF ANY NOTICE PROVIDED TO A CUSTOMER FOR WHOM  
7 PWD HAS FOUND INFORMATION THAT “INDICATES” TAMPERING  
8 EXPLAINING THE RIGHT OF THE CUSTOMER TO DISPUTE OR  
9 APPEAL THAT FINDING;
- 10 D. A DETAILED EXPLANATION OF WHETHER THE FACTORS  
11 SUFFICIENT TO “INDICATE” TAMPERING DIFFER FROM THAT  
12 INFORMATION TO “DEMONSTRATE” OR “PROVE” TAMPERING.  
13 FOR EXAMPLE, DOES IT REQUIRE LESS INFORMATION TO  
14 “INDICATE” TAMPERING THAT WOULD BE NEEDED TO  
15 “DEMONSTRATE” OR “PROVE” TAMPERING?
- 16 E. A DESCRIPTION OF PWD PROCESSES AND PROCEDURES  
17 UTILIZED IN DETERMINING HOW AND WHEN ALLEGED  
18 TAMPERING HAS OCCURRED, PARTICULARLY IN  
19 CIRCUMSTANCES IN WHICH HOUSEHOLD COMPOSITION,  
20 OWNERSHIP, AND/OR CUSTOMER STATUS MAY HAVE CHANGED.

21 **RESPONSE:**

- 22 A. Tampering is defined as any attempt by a customer to interfere with the meter / radio  
23 from accurately recording consumption.
- 24 B. Tampering of the meter / radio is indicated by the following during a visit to the  
25 property. Damaged Meter, Damaged Radio, Radio Missing, Radio Offline, Radio  
26 tampered, Meter Backwards, Meter and Radio Missing, Meter and Radio Offline,  
27 Meter Missing, Meter Offline and Meter Tampered.
- 28

- 1 C. WRB provides a letter to the customer explaining the charges as well as information  
2 to dispute the charges and a contact person to call.
- 3 D. In addition to the codes mentioned in Section B of this response, pictures of the  
4 tampering (where applicable) are taken and stored in the Metering application.
- 5 E. WRB makes the determination if there was ownership change and how any back  
6 billing is handled.
- 7

8 **RESPONSE PROVIDED BY:** Stephen Junod, Philadelphia Water Department

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1 **PA-II-19.** IN AN ACTIVE EXCEL SPREADSHEET, PLEASE PROVIDE THE COST  
2 BASIS OF:

- 3 A. THE 2023 TAMPERING CHARGE OF \$80;  
4 B. THE 2024 TAMPERING CHARGE OF \$90.

5  
6 **RESPONSE:**

7 See response attachment PA-II-19.

8  
9 In addition, refer to Schedule BV-4: WP-4 MISCELLANEOUS FEES METHODOLOGY  
10 including the workpapers included in Appendix A.

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12 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-20.** PLEASE PROVIDE BY YEAR FOR THE MOST RECENT THREE YEARS  
2 AVAILABLE:

3 A. THE TOTAL NUMBER OF RESIDENTIAL ACCOUNTS CHARGED A  
4 TAMPERING FEE;

5 B. THE TOTAL NUMBER OF HOMEOWNERS CHARGED A TAMPERING  
6 FEE;

7 C. THE TOTAL NUMBER OF TENANTS CHARGED A TAMPERING FEE;

8 D. THE TOTAL NUMBER OF OCCUPANTS CHARGED A TAMPERING  
9 FEE.

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11 **RESPONSE:**

12 Please see attachment PA-II-20.

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14 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
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1 **PA-II-21.** PLEASE PROVIDE THE 2021 ANNUAL PAYMENT AGREEMENT REPORT.  
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3 **RESPONSE:**

4 For available information, refer to:

5 <https://www.phila.gov/departments/department-of-revenue/reports/>.  
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7 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau  
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1 **PA-II-22.** THE MONTHLY COLLECTION REPORTS FOR:

2 A. JANUARY 2020 THROUGH JUNE 2022;

3 B. FOR DECEMBER 2022 TO THE PRESENT INCLUSIVE.

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5 **RESPONSE:**

6 Please refer to PA-I-43.

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8 **RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.

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1 **PA-II-23.** REFERENCE: STATEMENT 2A (PAGE 26): PLEASE PROVIDE THE  
2 IMPACT OF LIHWAP GRANTS ON NON-STORMWATER ONLY  
3 COLLECTION FACTORS FOR:

- 4 A. 2020;
- 5 B. 2021;
- 6 C. 2022.

7  
8 **RESPONSE:**

9 LIHWAP grants in FY22 accounted for collections for billings within each fiscal year as  
10 shown in the table below:

Billing Year	Payments within the Billing Year	Payments within the next Fiscal Year (Billing Year +1)	Payments after the next Fiscal Year (Billing Year +2)
FY2022	0.18%		
FY2021	0.00%	0.12%	
FY2020	0.00%	0.00%	0.07%

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17 Refer also the PA-II-25.

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19 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-II-24.** REFERENCE: STATEMENT 2A (PAGE 26): PLEASE PROVIDE THE  
2 IMPACT OF FEDERAL COVID-19 EMERGENCY RENTAL ASSISTANCE  
3 (ERA) GRANTS ON NON-STORMWATER ONLY COLLECTION FACTORS  
4 FOR:

- 5 A. 2020;
- 6 B. 2021;
- 7 C. 2022; AND
- 8 D. 2023 (PROJECTED OR ESTIMATED).

9  
10 **RESPONSE:**

11 ERA grants, administered by the Philadelphia Housing Development Corporation, in  
12 FY22 accounted for collections for billings within each fiscal year as shown in the table  
13 below:

Billing Year	Payments within the Billing Year	Payments within the next Fiscal Year (Billing Year +1)	Payments after the next Fiscal Year (Billing Year +2)
FY2022	0.05%		
FY2021	0.00%	0.12%	
FY2020	0.00%	0.00%	0.07%

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20 There are no existing projections for FY2023 that respond to this request.

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

1 **PA-II-25.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE BASIS FOR  
2 ASSUMING THAT BILLED DOLLARS THAT WERE PAID WITH LIHWAP  
3 GRANTS IN THE PAST WOULD NOT BE PAID AT ALL IN THE ABSENCE  
4 OF LIHWAP IN THE FUTURE.

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6 **RESPONSE:**

7 The assumption stated in this interrogatory (PA-II-25) is misplaced. That is, PWD's rate  
8 filing and the proposed rates and charges are NOT premised on the assumption that billed  
9 dollars that were paid with LIHWAP grants (in the past) would not have been paid in the  
10 absence of LIHWAP grants (in the future).

11  
12 Please also note as stated in PWD Statement 6 (response to question 14, pages 15 and 16),  
13 that grants provided by short-term, federally funded programs were included as payments  
14 in the Payment Patterns Report. See, Schedule RFC-7 (Payment Patterns Report).

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16 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-II-26.** CONFIRM OR DENY. LIHWAP BENEFITS APPLIED TO PWD ACCOUNTS  
2 ARE USED TO PAY BOTH PAST-DUE BILLS AND BILLS FOR CURRENT  
3 SERVICE. IF ANYTHING OTHER THAN AN UNQUALIFIED CONFIRMED,  
4 PLEASE PROVIDE A DETAILED EXPLANATION OF THE BASIS FOR THE  
5 RESPONSE.

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7 **RESPONSE:**

8 Confirm.

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

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- 1 **PA-II-27.** PLEASE PROVIDE BY MONTH FOR THE MOST RECENT 24 MONTH  
2 AVAILABLE:  
3 A. THE NUMBER OF PWD ACCOUNTS RECEIVING A LIHWAP GRANT;  
4 B. THE DOLLARS OF LIHWAP GRANTS RECEIVED BY PWD  
5 ACCOUNTS;  
6 C. THE AVERAGE LIHWAP GRANT RECEIVED BY PWD ACCOUNTS;  
7 D. THE PERCENTAGE OF THE AVERAGE LIHWAP GRANT PAID  
8 TOWARD BILLS THAT WERE NOT YET OVERDUE AT THE TIME OF  
9 RECEIVING LIHWAP;  
10 E. THE NUMBER OF TAP PARTICIPANTS RECEIVING A LIHWAP  
11 GRANT;  
12 F. THE DOLLARS OF LIHWAP GRANTS RECEIVED BY TAP  
13 PARTICIPANTS;  
14 G. THE AVERAGE LIHWAP GRANT RECEIVED BY TAP  
15 PARTICIPANTS;  
16 H. THE PERCENTAGE OF THE AVERAGE LIHWAP GRANT PAID  
17 TOWARD BILLS THAT WERE NOT YET OVERDUE AT THE TIME OF  
18 RECEIVING LIHWAP;  
19 I. THE NUMBER OF TAP PARTICIPANTS WITH PREPROGRAM  
20 ARREARS SUBJECT TO FORGIVENESS THAT RECEIVED LIHWAP  
21 GRANTS;  
22 J. THE DOLLARS OF LIHWAP GRANTS PAID TOWARD ARREARS  
23 THAT WOULD, IN THE ABSENCE OF LIHWAP, HAVE BEEN  
24 SUBJECT TO FORGIVENESS;  
25 K. THE AVERAGE LIHWAP GRANT PAID TOWARD A TAP  
26 PREPROGRAM ARREARAGE BALANCE THAT WOULD HAVE  
27 SUBJECT TO FORGIVENESS IN THE ABSENCE OF LIHWAP.  
28

- 1 L. THE NUMBER OF SENIOR DISCOUNT PARTICIPANTS RECEIVING A  
2 LIHWAP GRANT;  
3 M. THE DOLLARS OF LIHWAP GRANTS RECEIVED BY SENIOR  
4 DISCOUNT PARTICIPANTS.  
5 N. THE NUMBER OF OTHER CAP PARTICIPANTS RECEIVING A  
6 LIHWAP GRANT;  
7 O. THE DOLLARS OF LIHWAP GRANTS RECEIVED BY OTHER CAP  
8 PARTICIPANTS.  
9

10 **RESPONSE:**

11 The following responses are based on LIHWAP grants to PWD customers. The responses  
12 are not based on applications, approvals, and/or grants made by the Commonwealth which  
13 are not reported to WRB/PWD.

- 14 A. The reporting period is by month, from January 2021 through December 2022. See  
15 response attachment PA-II-27.  
16 B. The reporting period is by month, from January 2021 through December 2022. See  
17 response attachment PA-II-27.  
18 C. The reporting period is by month, from January 2021 through December 2022. See  
19 response attachment PA-II-27.  
20 D. There is no report available that captures this information.  
21 E. There is no report available that captures this information by month, therefore the  
22 information is provided as of December 31, 2022. See response attachment PA-II-  
23 27.  
24 F. There is no report available that captures this information by month, therefore the  
25 information is provided as of December 31, 2022. See response attachment PA-II-  
26 27.  
27  
28

- 1 G. There is no report available that captures this information by month, therefore the  
2 information is provided as of December 31, 2022. See response attachment PA-II-  
3 27.
- 4 H. There is no report available that captures this information.
- 5 I. There is no report available that captures this information.
- 6 J. There is no report available that captures this information.
- 7 K. There is no report available that captures this information.
- 8 L. There is no report available that captures this information by month, therefore the  
9 information is provided as of December 31, 2022. See response attachment PA-II-  
10 27.
- 11 M. There is no report available that captures this information by month, therefore the  
12 information is provided as of December 31, 2022. See response attachment PA-II-  
13 27.
- 14 N. There is no report available that captures this information by month, therefore the  
15 information is provided as of December 31, 2022. See response attachment PA-II-  
16 27.
- 17 O. There is no report available that captures this information by month, therefore the  
18 information is provided as of December 31, 2022. See response attachment PA-II-  
19 27.
- 20

21 **RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.  
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1 **PA-II-28.** PLEASE PROVIDE BY MONTH FOR THE MOST RECENT 24 MONTH  
2 AVAILABLE:

- 3 A. THE NUMBER OF PWD ACCOUNTS RECEIVING AN EMERGENCY  
4 RENTAL ASSISTANCE PROGRAM (ERAP) GRANT;  
5 B. THE DOLLARS OF ERAP GRANTS RECEIVED BY PWD ACCOUNTS;  
6 C. THE NUMBER OF TAP PARTICIPANTS RECEIVING AN ERAP  
7 GRANT;  
8 D. THE DOLLARS OF ERAP GRANTS RECEIVED BY TAP  
9 PARTICIPANTS;  
10 E. THE NUMBER OF SENIOR DISCOUNT PARTICIPANTS RECEIVING  
11 AN ERAP GRANT;  
12 F. THE DOLLARS OF ERAP GRANTS RECEIVED BY SENIOR  
13 DISCOUNT PARTICIPANTS.  
14 G. THE NUMBER OF OTHER CAP PARTICIPANTS RECEIVING AN  
15 ERAP GRANT;  
16 H. THE DOLLARS OF ERAP GRANTS RECEIVED BY OTHER CAP  
17 PARTICIPANTS.

18  
19 **RESPONSE:**

20 For available information regarding items A and B please see response attachment PA-II-  
21 28. For the remainder of the requested items, no reports exist.  
22

23 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
24  
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1 **PA-II-29.** PLEASE PROVIDE BY MONTH FOR THE MOST RECENT 24 MONTH  
2 AVAILABLE:

3 A. THE NUMBER OF PWD ACCOUNTS RECEIVING A HOMEOWNERS  
4 ASSISTANCE FUND (HAF) GRANT;

5 B. THE DOLLARS OF HAF GRANTS RECEIVED BY PWD ACCOUNTS;

6 C. THE NUMBER OF TAP PARTICIPANTS RECEIVING A HAF GRANT;

7 D. THE DOLLARS OF HAF GRANTS RECEIVED BY TAP  
8 PARTICIPANTS;

9 E. THE NUMBER OF SENIOR DISCOUNT PARTICIPANTS RECEIVING A  
10 HAF GRANT;

11 F. THE DOLLARS OF HAF GRANTS RECEIVED BY SENIOR DISCOUNT  
12 PARTICIPANTS.

13 G. THE NUMBER OF OTHER CAP PARTICIPANTS RECEIVING A HAF  
14 GRANT;

15 H. THE DOLLARS OF HAF GRANTS RECEIVED BY OTHER CAP  
16 PARTICIPANTS.

17  
18 **RESPONSE:**

19 For available information regarding items A and B please see response attachment PA-II-  
20 29. For the remainder of the requested items, no reports exist.

21  
22 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
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1 **PA-II-30.** CONFIRM OR DENY. IF ANYTHING OTHER THAN AN UNQUALIFIED  
2 “CONFIRMED,” PROVIDE A DETAILED EXPLANATION OF THE BASIS  
3 FOR THE RESPONSE:

4 A. LIHWAP DOLLARS ARE TO BE FULLY COMMITTED NO LATER  
5 THAN SEPTEMBER 2023;

6 B. LIHWAP DOLLARS ARE TO BE FULLY EXPENDED NO LATER  
7 THAN DECEMBER 2023.

8  
9 **RESPONSE:**

10 Please refer to American Rescue Plan Act of 2021(P.L. 117-2). Also, see 45 C.F.R Part  
11 75. For additional information regarding state administration of LIHWAP, please visit  
12 [www.dhs.pa.gov](http://www.dhs.pa.gov).

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14 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
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1 **PA-II-31.** REFERENCE: STATEMENT 5 (PAGE 3): PLEASE PROVIDE A SAMPLE OR  
2 ILLUSTRATION OF:

3 A. E-MAIL REMINDERS OF THE NEED TO RECERTIFY FOR TAP;

4 B. TEXT REMINDERS OF THE NEED TO RECERTIFY FOR TAP.

5 C. E-MAIL REMINDERS OF THE NEED TO RECERTIFY FOR  
6 CUSTOMER ASSISTANCE PROGRAMS GENERALLY.

7 D. TEXT REMINDERS OF THE NEED TO RECERTIFY FOR CUSTOMER  
8 ASSISTANCE PROGRAMS GENERALLY.

9  
10 **RESPONSE:**

11 At this time, text messages are not used to remind customers of the need to recertify for  
12 customer assistance programs. Two email reminders are sent to customers who need to  
13 recertify for both TAP and WRBCC. The email templates are included as attachments PA-  
14 II-31A and PA-II-31B. This response refers to the e-billing website MyPhillyWaterBill.

15  
16 **RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.  
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1 **PA-II-32.** REFERENCE: STATEMENT 5 (PAGE 3). PLEASE PROVIDE A DETAILED  
2 EXPLANATION OF THE EXTENT TO WHICH PWD OFFERS A TEXT-  
3 BASED PROCESS FOR:

- 4 A. CUSTOMER ASSISTANCE PROGRAM APPLICATIONS (INCLUDING  
5 THE SUBMISSION OF DOCUMENTS);  
6 B. CUSTOMER ASSISTANCE PROGRAM RECERTIFICATION  
7 (INCLUDING THE SUBMISSION OF DOCUMENTS).  
8

9 **RESPONSE:**

10 At this time, WRB does not offer a text-based process for customer assistance program  
11 applications or recertifications including the submission of documents. See also response  
12 to PA-II-31.  
13

14 **RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.  
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1 **PA-II-33.** REFERENCE: STATEMENT 5 (PAGE 3). PLEASE PROVIDE A DETAILED  
2 EXPLANATION OF THE EXTENT TO WHICH PWD OFFERS AN E-MAIL-  
3 BASED PROCESS FOR:

- 4 A. CUSTOMER ASSISTANCE PROGRAM APPLICATIONS (INCLUDING  
5 THE SUBMISSION OF DOCUMENTS);  
6 B. CUSTOMER ASSISTANCE PROGRAM RECERTIFICATION  
7 (INCLUDING THE SUBMISSION OF DOCUMENTS).  
8

9 **RESPONSE:**

10 At this time, WRB does not accept documents via email from customers as a part of  
11 applying or recertifying for customer assistance programs. WRB monitors a dedicated  
12 email address that customers can use to submit questions regarding the application process  
13 at any time. Emails are used to notify customers it is time to recertify, acknowledge online  
14 application submissions, and confirm successful upload of documents to the online  
15 application portal. See also response to PA-II-31.  
16

17 **RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.  
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1 **PA-II-34.** REFERENCE: STATEMENT 5 (PAGE 3). PLEASE PROVIDE A DETAILED  
2 EXPLANATION OF THE EXTENT TO WHICH PWD OFFERS A WEB-  
3 BASED PROCESS FOR:

- 4 A. CUSTOMER ASSISTANCE PROGRAM APPLICATIONS (INCLUDING  
5 THE SUBMISSION OF DOCUMENTS);  
6 B. CUSTOMER ASSISTANCE PROGRAM RECERTIFICATION  
7 (INCLUDING THE SUBMISSION OF DOCUMENTS).  
8

9 **RESPONSE:**

10 PWD offers an online application portal where customers can print an application locally,  
11 or request an application to be mailed to them, or they can choose to fill out the  
12 application online in one or more sessions. Customers can upload documents with their  
13 online application or mail copies of these documents with their paper application. There is  
14 a single form for both new applications and recertification applications. If a customer is  
15 notified their application is incomplete, they can upload the missing documents to the  
16 online application portal. See also response to PA-II-31.  
17

18 **RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.  
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1 **PA-II-35.** REFERENCE: STATEMENT 5 (PAGE 3): IN AN EXCEL SPREADSHEET,  
2 PLEASE PROVIDE BY MONTH FOR THE MOST RECENT 24 MONTHS  
3 AVAILABLE:

- 4 A. THE NUMBER OF CUSTOMER ASSISTANCE PROGRAM  
5 APPLICATIONS BY PLATFORM OF APPLICATION (E.G., IN-PERSON,  
6 MAIL, E-MAIL, TEXT, WEB, OTHER);
- 7 B. THE NUMBER OF CUSTOMER ASSISTANCE PROGRAM  
8 RECERTIFICATIONS BY PLATFORM OF APPLICATIONS (E.G., IN-  
9 PERSON, MAIL, E-MAIL, TEXT, WEB, OTHER);
- 10 C. THE PERCENTAGE OF CUSTOMER ASSISTANCE PROGRAM  
11 APPLICATIONS BY PLATFORM OF APPLICATION (E.G., IN-PERSON,  
12 MAIL, E-MAIL, TEXT, WEB, OTHER);
- 13 D. THE PERCENTAGE OF CUSTOMER ASSISTANCE PROGRAM  
14 RECERTIFICATIONS BY PLATFORM OF APPLICATIONS (E.G., IN-  
15 PERSON, MAIL, E-MAIL, TEXT, WEB, OTHER).

16  
17 **RESPONSE:**

18 Existing reporting on the number of applications requested (by method), submitted (by  
19 method), and final dispositions are provided in response to PA-I-26. Reporting does not  
20 differentiate between new applications and recertification applications. Percentages can be  
21 calculated from the provided data.

22  
23 **RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.  
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1 **PA-II-36.** REFERENCE: STATEMENT 5 (PAGES 4 – 5): IN AN ACTIVE EXCEL  
2 SPREADSHEET, PLEASE PROVIDE BY MONTH FOR FISCAL YEARS 2020,  
3 2021, 2022, AND 2023 (YTD):

- 4 A. THE NUMBER OF RESIDENTIAL ACCOUNTS IN ARREARS MORE  
5 THAN 30 DAYS NOT ON AGREEMENT;  
6 B. THE DOLLARS OF RESIDENTIAL ARREARS (OLDER THAN 30  
7 DAYS) NOT ON AGREEMENT;  
8 C. THE AVERAGE ARREARS OF ACCOUNTS IN ARREARS MORE  
9 THAN 30 DAYS NOT ON AGREEMENT;  
10 D. THE NUMBER OF RESIDENTIAL ACCOUNTS IN ARREARS MORE  
11 THAN 30 DAYS ON AGREEMENT;  
12 E. THE DOLLARS OF RESIDENTIAL ARREARS (OLDER THAN 30  
13 DAYS) ON AGREEMENT;  
14 F. THE AVERAGE ARREARS OF ACCOUNTS IN ARREARS MORE  
15 THAN 30 DAYS ON AGREEMENT;  
16 G. THE TOTAL NUMBER OF RESIDENTIAL ACCOUNTS IN ARREARS  
17 MORE THAN 30 DAYS;  
18 H. THE TOTAL DOLLARS OF RESIDENTIAL ARREARS OLDER THAN  
19 30-DAYS.  
20

21 **RESPONSE:**

22 After reasonable investigation, no reports or documents have been identified that capture  
23 the information requested.  
24

25 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
26  
27  
28

- 1 **PA-II-37.** REFERENCE: STATEMENT 5 (PAGES 4 – 5): IN AN ACTIVE EXCEL  
2 SPREADSHEET, PLEASE PROVIDE BY MONTH FOR FISCAL YEARS 2020,  
3 2021, 2022, AND 2023 (YTD):
- 4 A. THE NUMBER OF TAP ACCOUNTS IN ARREARS MORE THAN 30  
5 DAYS NOT ON AGREEMENT;
  - 6 B. THE DOLLARS OF TAP ARREARS (OLDER THAN 30 DAYS) NOT ON  
7 AGREEMENT;
  - 8 C. THE AVERAGE ARREARS OF TAP ACCOUNTS IN ARREARS MORE  
9 THAN 30 DAYS NOT ON AGREEMENT;
  - 10 D. THE NUMBER OF TAP ACCOUNTS IN ARREARS MORE THAN 30  
11 DAYS ON AGREEMENT;
  - 12 E. THE DOLLARS OF TAP ARREARS (OLDER THAN 30 DAYS) ON  
13 AGREEMENT;
  - 14 F. THE AVERAGE ARREARS OF TAP ACCOUNTS IN ARREARS MORE  
15 THAN 30 DAYS ON AGREEMENT;
  - 16 G. THE TOTAL NUMBER OF TAP ACCOUNTS IN ARREARS;
  - 17 H. THE TOTAL DOLLARS OF TAP ARREARS OLDER THAN 30-DAYS.

18  
19 **RESPONSE:**

20 After reasonable investigation, no reports or documents have been identified that capture  
21 the information requested.  
22

23 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
24  
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1 **PA-II-38.** REFERENCE: STATEMENT 5 (PAGES 4 – 5): IN AN ACTIVE EXCEL  
2 SPREADSHEET, PLEASE PROVIDE BY MONTH FOR FISCAL YEARS 2020,  
3 2021, 2022, AND 2023 YTD):

- 4 A. THE NUMBER OF SENIOR DISCOUNT ACCOUNTS IN ARREARS  
5 MORE THAN 30 DAYS NOT ON AGREEMENT;  
6 B. THE DOLLARS OF SENIOR DISCOUNT ARREARS (OLDER THAN 30  
7 DAYS) NOT ON AGREEMENT;  
8 C. THE AVERAGE ARREARS OF SENIOR DISCOUNT ACCOUNTS IN  
9 ARREARS MORE THAN 30 DAYS NOT ON AGREEMENT;  
10 D. THE NUMBER OF SENIOR DISCOUNT ACCOUNTS IN ARREARS  
11 MORE THAN 30 DAYS ON AGREEMENT;  
12 E. THE DOLLARS OF SENIOR DISCOUNT ARREARS (OLDER THAN 30  
13 DAYS) ON AGREEMENT;  
14 F. THE AVERAGE ARREARS OF SENIOR DISCOUNT ACCOUNTS IN  
15 ARREARS MORE THAN 30 DAYS ON AGREEMENT;  
16 G. THE TOTAL NUMBER OF SENIOR DISCOUNT ACCOUNTS IN  
17 ARREARS;  
18 H. THE TOTAL DOLLARS OF SENIOR DISCOUNT ARREARS OLDER  
19 THAN 30-DAYS.  
20

21 **RESPONSE:**

22 After reasonable investigation, no reports or documents have been identified that capture  
23 the information requested.  
24

25 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
26  
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28

1 **PA-II-39.** REFERENCE: STATEMENT 5 (PAGES 4 – 5): PLEASE PROVIDE A  
2 DETAILED DESCRIPTION OF HOW, IF AT ALL, RESIDENTIAL  
3 CUSTOMERS CAN ENTER INTO PAYMENT AGREEMENTS BY TEXT IF  
4 THE PAYMENT AGREEMENT IS:  
5 A. A STANDARD AGREEMENT;  
6 B. AN EXTENDED AGREEMENT;  
7 C. A TAP AGREEMENT.

8  
9 **RESPONSE:**

10 At this time, the City does not offer water customers payment agreements by text.  
11

12 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
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1 **PA-II-40.** REFERENCE: STATEMENT 5 (PAGES 4 – 5): PLEASE PROVIDE A  
2 DETAILED DESCRIPTION OF HOW, IF AT ALL, RESIDENTIAL  
3 CUSTOMERS CAN ENTER INTO PAYMENT AGREEMENTS VIA A WEB-  
4 BASED PORTAL IF THE PAYMENT AGREEMENT IS:  
5 A. A STANDARD AGREEMENT;  
6 B. AN EXTENDED AGREEMENT;  
7 C. A TAP AGREEMENT.

8  
9 **RESPONSE:**

10 At this time, the City does not offer water customers payment agreements via a web-based  
11 portal.

12  
13 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
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1 **PA-II-41.** REFERENCE: STATEMENT 5 (PAGE 8): CONFIRM OR DENY: TAP  
2 AND/OR CUSTOMER ASSISTANCE PROGRAM PARTICIPATION DOES  
3 NOT MAKE A RESIDENTIAL CUSTOMERS IN ARREARS INELIGIBLE  
4 FOR UESF GRANTS. IF ANYTHING OTHER THAN AN UNQUALIFIED  
5 “CONFIRMED,” PROVIDE A DETAILED EXPLANATION OF ALL WAYS IN  
6 WHICH TAP AND/OR CUSTOMER ASSISTANCE PROGRAM  
7 PARTICIPATION AFFECTS THE ELIGIBILITY OF A RESIDENTIAL  
8 CUSTOMER IN ARREARS FOR A UESF GRANT AND HOW THAT  
9 ELIGIBILITY DIFFERS FROM A RESIDENTIAL CUSTOMER IN ARREARS  
10 THAT IS NOT ENROLLED IN TAP. IF THE ANSWER VARIES BY TYPE OF  
11 CUSTOMER ASSISTANCE PROGRAM, PLEASE PROVIDE AN ANSWER  
12 FOR EACH PROGRAM.

13

14 **RESPONSE:**

15 Confirmed.

16

17 **RESPONSE PROVIDED BY:** Water Revenue Bureau

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1 **PA-II-42.** REFERENCE: STATEMENT 5 (PAGE 13): PLEASE PROVIDE A DETAILED  
2 EXPLANATION OF:

3 A. HOW THE 3,175 TAP PARTICIPANTS APPLY FOR THE NEW TAP  
4 DEBT PROTECTIONS;

5 B. HOW THE 3,175 TAP PARTICIPANTS QUALIFY FOR THE NEW TAP  
6 DEBT PROTECTIONS;

7 C. HOW THE 3,175 TAP PARTICIPANTS WERE SELECTED FOR  
8 EXTENSION OF THE NEW TAP DEBT PROTECTIONS.

9  
10 **RESPONSE:**

11 TAP participants did not need to apply for the additional debt protection described in  
12 PWD Statement 5. All TAP participants with delinquent TAP debt had the debt associated  
13 with unpaid TAP bills placed in a protected status, as described in PWD Statement 5.

14 There were 6,824 TAP customers that had their debt protected. Please note that an errata  
15 will be filed with respect to PWD Statement 5 to correct the number of TAP participants  
16 placed on protective status.

17  
18 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
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1 **PA-II-43.** REFERENCE: STATEMENT 5 (PAGE 13): BY MONTH FOR EACH MONTH  
2 SINCE SEPTEMBER 2021, PLEASE PROVIDE:

3 A. THE NUMBER OF TAP PARTICIPANTS WHO WERE “SHIELDED  
4 FROM THE ENFORCEMENT PROCESS” BY THE NEW TAP DEBT  
5 PROTECTIONS DEPLOYED IN SEPTEMBER 2021.

6 B. THE NUMBER OF TAP PARTICIPANTS IN ARREARS WHO WERE  
7 NOT “SHIELDED FROM THE ENFORCEMENT PROCESS” BY THE  
8 NEW TAP DEBT PROTECTIONS DEPLOYED IN SEPTEMBER 2021.

9 C. A DETAILED EXPLANATION OF THE PROCESS FOR  
10 DISTINGUISHING WHICH TAP PARTICIPANTS IN ARREARS WERE  
11 AND WERE NOT “SHIELDED FROM THE ENFORCEMENT PROCESS”  
12 BY THE NEW TAP DEBT PROTECTIONS DEPLOYED IN SEPTEMBER  
13 2021.

14  
15 **RESPONSE:**

16 Please see response to PA-II-42. The additional debt protection was a one-time measure,  
17 and information is not captured in monthly reports.

18  
19 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
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- 1 **PA-II-44.** REFERENCE: STATEMENT 5 (PAGES 4 – 5): IN AN ACTIVE EXCEL  
2 SPREADSHEET, PLEASE PROVIDE BY MONTH FOR FISCAL YEARS 2020,  
3 2021, 2022, AND 2023 (YTD):
- 4 A. THE NUMBER OF ACTIVE STANDARD PAYMENT AGREEMENTS;
  - 5 B. THE NUMBER OF NEW STANDARD PAYMENT AGREEMENTS;
  - 6 C. THE NUMBER OF ACTIVE EXTENDED PAYMENT AGREEMENTS;
  - 7 D. THE NUMBER OF NEW EXTENDED PAYMENT AGREEMENTS;
  - 8 E. THE TOTAL DOLLARS OF ARREARS SUBJECT TO AN ACTIVE  
9 STANDARD PAYMENT AGREEMENT;
  - 10 F. THE TOTAL DOLLARS OF ARREARS SUBJECT TO AN EXTENDED  
11 PAYMENT AGREEMENT;
  - 12 G. THE AVERAGE DOLLARS OF ARREARS OF ACCOUNTS ON ACTIVE  
13 STANDARD PAYMENT AGREEMENTS;
  - 14 H. THE AVERAGE DOLLARS OF ARREARS OF ACCOUNTS ON ACTIVE  
15 EXTENDED PAYMENT AGREEMENTS.

16  
17 **RESPONSE:**

18 Please see response attachment PA-II-44.

19  
20 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
21  
22  
23  
24  
25  
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1 **PA-II-45.** REFERENCE: STATEMENT 5 (PAGES 11 – 12): IN AN EXCEL  
2 SPREADSHEET, PLEASE PROVIDE BY MONTH FOR FISCAL YEARS 2020,  
3 2021, 2022, AND 2023 (YTD):

- 4 A. THE TOTAL NUMBER OF RESIDENTIAL NONPAYMENT  
5 TERMINATIONS.
- 6 B. THE NUMBER OF RESIDENTIAL NONPAYMENT TERMINATIONS  
7 FOR HOMEOWNERS;
- 8 C. THE NUMBER OF RESIDENTIAL NONPAYMENT TERMINATIONS  
9 FOR TENANTS;
- 10 D. THE NUMBER OF RESIDENTIAL NONPAYMENT TERMINATIONS  
11 FOR OCCUPANTS;
- 12 E. THE TOTAL NUMBER OF RESIDENTIAL ACCOUNTS.
- 13 F. THE TOTAL NUMBER OF RESIDENTIAL ACCOUNTS THAT ARE  
14 HOMEOWNERS;
- 15 G. THE TOTAL NUMBER OF RESIDENTIAL ACCOUNTS THAT ARE  
16 TENANTS;
- 17 H. THE TOTAL NUMBER OF RESIDENTIAL ACCOUNTS THAT ARE  
18 OCCUPANTS;

19  
20 **RESPONSE:**

21 Please see response attachment PA-II-45.

22  
23 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
24  
25  
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28

1 **PA-II-46.** REFERENCE: STATEMENT 5 (PAGES 11 -1 2): IN AN EXCEL  
2 SPREADSHEET, PLEASE PROVIDE BY MONTH FOR FISCAL YEARS 2020,  
3 2021, 2022, AND 2023 (YTD):

- 4 A. THE AVERAGE DOLLARS OF ARREARS AT THE TIME OF  
5 TERMINATION FOR ALL RESIDENTIAL ACCOUNTS;  
6 B. THE AVERAGE DOLLARS OF ARREARS AT THE TIME OF  
7 TERMINATION FOR HOMEOWNERS;  
8 C. THE AVERAGE DOLLARS OF ARREARS AT THE TIME OF  
9 TERMINATION FOR TENANTS;  
10 D. THE AVERAGE DOLLARS OF ARREARS AT THE TIME OF  
11 TERMINATION FOR OCCUPANTS;  
12 E. THE AGGREGATE DOLLARS OF ARREARS AT THE TIME OF  
13 TERMINATION FOR ALL RESIDENTIAL ACCOUNTS;  
14 F. THE AGGREGATE DOLLARS OF ARREARS AT THE TIME OF  
15 TERMINATION FOR HOMEOWNERS;  
16 G. THE AGGREGATE DOLLARS OF ARREARS AT THE TIME OF  
17 TERMINATION FOR TENANTS;  
18 H. THE AGGREGATE DOLLARS OF ARREARS AT THE TIME OF  
19 TERMINATION FOR OCCUPANTS.

20  
21 **RESPONSE:**

22 After reasonable investigation, no report has been identified that captures the information  
23 requested.  
24

25 **RESPONSE PROVIDED BY:** Water Revenue Bureau  
26  
27  
28

1 **PA-II-47.** REFERENCE: STATEMENT 6 (PAGE 8). PLEASE PROVIDE A SINGLE  
2 COPY OF EACH REPORT IDENTIFIED IN THE BULLETED LIST FOR  
3 FISCAL YEARS 2020, 2021, 2022, AND 2023. IF ONE OF THOSE REPORTS  
4 IS THE ANNUAL REPORT TO THE MAYOR REGARDING TAP, THAT  
5 ANNUAL REPORT NEED NOT BE PROVIDED AGAIN IN THIS RESPONSE.  
6

7 **RESPONSE:**

8 Please refer to PWD Statement 6 (RFC testimony) at page 8. The bulleted list from the  
9 aforesaid RFC testimony is restated below, with references to the associated reports.

- 10 - Daily and weekly customer assistance application processing reports have been provided  
11 as Attachment PA-I-25\_A  
12 - Monthly program statistics: this information has been provided as PA-I-56.  
13 - For monthly measures of enrollment, other application outcomes, and arrearage  
14 forgiveness, and the monthly TAP reports to the Rate Board refer to PA-I-21 response  
15 (when available).  
16 - Annual (fiscal year basis) cost of program reporting has been provided as a part of PWD  
17 Statement 6, Schedules RFC-5, RFC-6, and RFC-7. Schedules RFC-5 and RFC-7 report  
18 on fiscal years 2020, 2021, 2022 and years prior to 2020. Schedule RFC-6 reports on  
19 fiscal year 2022, and a similar set of reports for fiscal year 2020 has been submitted as  
20 Schedule RFC-5, Statement 6 from the 2021 Rate Case.  
21 - For annual (calendar year basis) City Council-required reports refer to PA-I-21 response  
22 (when available).  
23 - Other ad hoc and periodic reports to support management of TAP have been provided in  
24 response to PA-I-25.  
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28 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-II-48.** REFERENCE: STATEMENT 6, PAGE 8: PLEASE DEFINE “AD HOC” AS  
2 USED IN THE REFERENCE TO “AD HOC” REPORTS.  
3

4 **RESPONSE:**

5 “Ad hoc” reports refer to a limited number of reports that can be run by WRB staff when  
6 needed.  
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8 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**PA-II-49.** REFERENCE: STATEMENT 6, PAGE 8: PLEASE PROVIDE A LIST OF EACH “AD HOC” REPORT PROVIDED TO PWD AND/OR THE WRB REGARDING TAP SINCE FISCAL YEAR 2020. SEPARATELY PROVIDE A COPY OF EACH “AD HOC” REPORT PROVIDED TO PWD AND/OR WRB REGARDING TAP PREPARED DURING FISCAL YEARS 2021, 2022, AND 2023.

**RESPONSE:**

Refer to PA-II-47 for daily, weekly, and quarterly reports. Ad hoc reports are run as needed by WRB staff.

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

1 **PA-II-50.** REFERENCE: STATEMENT 6, PAGE 9. PROVIDE A COPY OF EACH  
2 MONTHLY TAP STATISTICS REPORT FOR JULY 2021 THROUGH THE  
3 PRESENT INCLUSIVE.  
4

5 **RESPONSE:**

6 These reports have been listed in response to PA-I-56 and PA-I-25.  
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8 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-II-51.** REFERENCE STATEMENT 6, PAGE 13 (EXH. RFC-7). PLEASE PROVIDE A  
2 SEPARATE PAYMENT PATTERN REPORT AS SET FORTH IN RFC-7 FOR  
3 WITHOUT STORMWATER FOR:

- 4 A. ALL PWD RESIDENTIAL CUSTOMERS.  
5 B. PWD CUSTOMERS EXCLUDING ALL CUSTOMER ASSISTANCE  
6 PROGRAM RECIPIENTS.  
7 C. PWD CUSTOMERS EXCLUDING TAP RECIPIENTS ONLY;  
8 D. PWD TAP RECIPIENTS ONLY.

9  
10 IF SEPARATE REPORTS ARE NOT POSSIBLE, PLEASE PROVIDE A  
11 DETAILED EXPLANATION OF WHAT ADJUSTMENTS WOULD BE  
12 NECESSARY TO MAKE TO RFC-7 TO PROVIDE SUCH REPORTS  
13 ADJUSTING FOR TAP.

14  
15 **RESPONSE:**

16 Refer to attachment PA-I-15, which provides reporting on TAP and Senior Citizen Discount  
17 program participants total billings (including stormwater). After reasonable investigation,  
18 no other reports have been identified that capture the requested information.

19  
20 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-II-52.** CONFIRM OR DENY. IF THE RESPONSE IS ANYTHING OTHER THAN AN  
2 UNQUALIFIED “CONFIRMED,” PROVIDE A DETAILED EXPLANATION  
3 OF THE RESPONSE. LIHWAP, HAF AND ERAP DOLLARS ARE MEANS-  
4 TESTED AND AVAILABLE TO TAP-ELIGIBLE CUSTOMERS, BUT NOT  
5 AVAILABLE TO RESIDENTIAL CUSTOMERS GENERALLY WHO ARE  
6 NOT TAP-ELIGIBLE.

7  
8 **RESPONSE:**

9 DENY. The LIHWAP, HAF AND ERAP programs are means-tested programs not  
10 administered by the City of Philadelphia. WRB applies grants to accounts approved by the  
11 third-party administrators, regardless of TAP status.

12  
13 **RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.

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**PA-II-53.** PLEASE PROVIDE THE EQUIVALENT OF THE LOW-INCOME BILLING AND PAYMENTS REPORT (STATEMENT NO. 6, EXHIBIT RFC-9, AS FILED IN THE 2021 PWD RATE PROCEEDING), BROUGHT CURRENT TO THE MOST RECENTLY COMPLETED FISCAL YEAR.

**RESPONSE:**

Refer to PA-I-15.

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

1 **PA-II-54.** REFERENCE: SCHEDULE BV-1, TABLE C-1B, LINES 1, 2, AND 3.  
2 EXPLAIN WHETHER THE COLLECTION FACTOR OF 96.98% IS APPLIED  
3 TO THESE DOLLARS TO DETERMINE THE ACTUAL RECEIPTS DERIVED  
4 FROM THE TAP SURCHARGE RATES.

5  
6 **RESPONSE:**

7 As explained in PWD Statement 6 – Direct Testimony of Raftelis Financial Consultants,  
8 the collection factor of 96.98% represents a multi-year payment pattern (or summary of  
9 receipts) across a number of fiscal years. As discussed in PWD Statement 7 – Direct  
10 Testimony of Black & Veatch Management Consulting, LLC Schedule BV-2: Water and  
11 Wastewater Cost of Service Report, Section 3.1.4.3 Application of Collection Factors, the  
12 collection factors are applied to estimated historical and projected billings. The application  
13 of the multi-year payment pattern collection factors is already reflected in the dollars  
14 presented in Table C-1B Lines 1, 2 and 3, as these lines represent estimated receipts under  
15 existing TAP-R rates.

16  
17 The TAP-R revenues under existing rates presented in Lines 1, 2 and 3 of Table C-1B  
18 were developed using the FINPLAN model file provided to the Public Advocate. The  
19 FINPLAN model file provides the option to develop projected billings and revenues  
20 including or excluding TAP-R rates [Range Name: Z\_TAPSUR or cell address  
21 Customer!AO2]. The TAP-R revenues are developed by comparing the projected revenues  
22 including and excluding TAP-R rates. Response attachment PA-II-54 and 57.xls provides  
23 the FINPLAN model output supporting the derivation of the projected TAP-R revenues.

24  
25 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
26  
27  
28

1 **PA-II-55.** IF THE RESPONSE TO THE IMMEDIATELY PRECEDING DATA REQUEST  
2 IS “NO,” IDENTIFY THE TOTAL RECEIPTS ACTUALLY EXPECTED TO BE  
3 RECEIVED FROM THESE DOLLARS. IF THE RESPONSE IS “YES,”  
4 IDENTIFY THE TOTAL TAP-R BILLINGS AGAINST WHICH THE  
5 COLLECTABILITY FACTOR HAS BEEN APPLIED TO DERIVE THESE  
6 RECEIPTS.

7  
8 **RESPONSE:**

9 As noted in the response to PA-II-54, the application of the multi-year payment pattern  
10 collection factors is already reflected in the dollars presented in Table C-1B Lines 1, 2 and  
11 3, as these lines represent projected estimated receipts under existing TAP-R rates.

12  
13 As a point of clarification, TAP-R rates are handled via a separate proceeding before the  
14 Water, Sewer and Storm Water Rate Board. As explained in PWD Statement 7, Table C-  
15 1B is presented to allow the evaluation of total system revenues against the required  
16 General Ordinance requirements and Rate Board metrics. []

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18 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-56.** IN REFERENCE: SCHEDULE BV-1, TABLE C-1B. CONFIRM OR DENY.  
2 LINES 1, 2 AND 3 ARE DOLLARS THAT, IN THE ABSENCE OF THE TAP  
3 DISCOUNT, WOULD HAVE BEEN CHARGED TO CUSTOMERS WHO ARE  
4 NOW TAP PARTICIPANTS (I.E., THESE DOLLARS ARE THE LOST  
5 REVENUES FROM TAP). IF DENIED, PROVIDE A DETAILED  
6 DESCRIPTION OF WHAT DOLLAR AMOUNTS IN THESE LINES WOULD  
7 HAVE BEEN CHARGED TO TAP PARTICIPANTS HAD THERE BEEN NO  
8 TAP DISCOUNT (I.E., WHAT DOLLAR AMOUNTS OF LOST REVENUE  
9 ARE INCLUDED IN EACH LINE).  
10

11 **RESPONSE:**

12 Deny. The dollars presented in Table C-1B Lines 1, 2 and 3 are the total estimated  
13 system-wide receipts associated with the TAP-R surcharge. The TAP-R surcharge is a  
14 rate making tool to recover the cost of providing TAP credits. Assuming that there had  
15 been no TAP Discount and no TAP-R reconciliation balance (E Factor), there would not  
16 be TAP-R rates or revenue to present in Table C-1B.  
17

18 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-57.** REFERENCE: SCHEDULE BV-1, TABLE C-1B. PLEASE EXPLAIN LINE 4  
2 AND PROVIDE ITS DERIVATION, INCLUDING ALL ACTIVE EXCEL  
3 SPREADSHEETS USED TO DEVELOP THIS EXPLANATION.  
4

5 **RESPONSE:**

6 Table C-1B Line 4 presents the additional revenue (reductions) associated with the  
7 proposed FY 2024 TAP-R surcharge rates. Since the proposed FY 2024 TAP-R rates are  
8 lower than the current TAP-R rates, the implementation of the FY 2024 TAP-R rates will  
9 reduce the TAP-R revenues.  
10

11 As explained in the response to question II-54, the provided FINPLAN model was used to  
12 develop the TAP-R revenue projections. See response attachment PA-II-54 and 57.  
13

14 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-58.** REFERENCE: SCHEDULE BV-1, TABLE C-1B. PLEASE EXPLAIN LINE 11  
2 AND PROVIDE ITS DERIVATION, INCLUDING ALL ACTIVE EXCEL  
3 SPREADSHEETS USED TO DEVELOP THIS EXPLANATION.  
4

5 **RESPONSE:**

6 As noted in note (a) of Table C-1B, Line 11 reflects the following:

- 7 • FY 2023 and FY 2024 reflect TAP Credits based on the proposed 2023 Annual  
8 Adjustment.
  - 9 ○ For FY 2023 see Table 3-W and Table 3-WW (column 1) of Schedule BV-  
10 1 of the 2023 TAP-R Reconciliation Filing.
  - 11 ○ For FY 2024 see Table 2 of Schedule BV-1 of the 2023 TAP-R  
12 Reconciliation Filing.
- 13 • FY 2025 to FY 2028 reflect proposed TAP-R revenue requirement based on the  
14 proposed 2023 Annual Adjustment. See Table 1 (Line 4) of Schedule BV-1 of the  
15 2023 TAP-R Reconciliation Filing.

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17 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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- 1 **PA-II-59.** REFERENCE: SCHEDULE BV-1, TABLE C-1A, LINES 1, 2 AND 3:  
2  
3 A. DO THESE DOLLAR FIGURES REPRESENTING BILLINGS OR  
4 RECEIPTS (COMPARE TABLE C-1A TO TABLE C-3 WHICH HAS  
5 IDENTICAL NUMBERS BUT IS REFERRED TO AS “RECEIPTS”).  
6  
7 B. IF THE FIGURES ARE RECEIPTS, ARE THE RECEIPTS DERIVED BY  
8 MULTIPLYING A LARGER BILLING DOLLAR AMOUNT BY THE  
9 PROPOSED COLLECTABILITY FACTOR OF 96.98%? IF SO, PROVIDE  
10 THE NUMBERS FOR LINES 1, 2 AND 3 AGAINST WHICH THE  
11 COLLECTABILITY FACTOR WAS APPLIED. IF SOME OTHER  
12 COLLECTABILITY FACTOR WAS USED, IDENTIFY THAT  
13 COLLECTABILITY FACTOR AND EXPLAIN WHY IT WAS USED IN  
14 LIEU OF THE 96.98%.  
15  
16 C. IF THE DOLLAR FIGURES PRESENTED IN LINES 1, 2 AND 3 ARE  
17 BILLINGS, ARE THE ACTUAL EXPECTED RECEIPTS DERIVED BY  
18 MULTIPLYING THESE LINES BY THE PROPOSED  
19 COLLECTABILITY FACTOR OF 96.98%? IF SO, PROVIDE THE  
20 EXPECTED RECEIPTS TAKING INTO ACCOUNT THE  
21 COLLECTABILITY FACTOR. IF SOME OTHER COLLECTABILITY  
22 FACTOR WAS USED, IDENTIFY THAT COLLECTABILITY FACTOR  
23 AND EXPLAIN WHY IT WAS USED IN LIEU OF THE 96.98%.

22 **RESPONSE:**

- 23 A. Receipts.  
24 B. As discussed in PWD Statement 7 – Direct Testimony of Black & Veatch  
25 Management Consulting, LLC Schedule BV-2: Water and Wastewater Cost of Service  
26 Report, Section 3.1.4.3 Application of Collection Factors, the multi-year collection  
27 factors are applied to projected billings over three fiscal years. Lines 1, 2, and 3 of  
28 Table C-1a include projected receipts associated with non-stormwater only and



1 stormwater only customers as well as wholesale customers. Projected billings are  
2 provided in Schedule BV-2: Water and Wastewater Cost of Service Report (Table 3-6  
3 and Table 6-10), PWD Exhibit 6 (FINPLAN Customer-7, Customer-9, Customer-15,  
4 Customer-18, Customer-19, and Customer-38), and the previously provided FINPLAN  
5 model.

6 C. Not applicable, see response to items A and B.

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8 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-60.** REFERENCE: SCHEDULE BV-1, SCHEDULE C-1A. PROVIDE THE  
2 EQUIVALENT OF “NON-STORMWATER ONLY” FOR 2019, 2020, 2021,  
3 AND 2022 FOR:

- 4 A. ALL CUSTOMER ASSISTANCE PROGRAM PARTICIPANTS
- 5 B. TAP PARTICIPANTS;
- 6 C. LOW-INCOME NON-TAP CUSTOMERS (DEFINING WHAT A LOW-  
7 INCOME NON-TAP CUSTOMER IS).

8  
9 **RESPONSE:**

10 As discussed in Statement 7, Table C-1A represents the system-wide revenue  
11 requirements and revenues under base rates. The revenue and revenue requirement data  
12 required to support the requested iterations is not available.

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14 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-61.** REFERENCE: SCHEDULE BV-1, SCHEDULE C-1B. PROVIDE THE  
2 EQUIVALENT OF “NON-STORMWATER ONLY” FOR 2019, 2020, 2021,  
3 AND 2022 FOR:

- 4 A. ALL CUSTOMER ASSISTANCE PROGRAM PARTICIPANTS
- 5 B. TAP PARTICIPANTS;
- 6 C. LOW-INCOME NON-TAP CUSTOMERS (DEFINING WHAT A LOW-  
7 INCOME NON-TAP CUSTOMER IS).

8  
9 **RESPONSE:**

10 Table C-1B represents the system-wide revenue requirements and revenues under TAP-R  
11 rates. The revenue and revenue requirement data required to support the requested  
12 iterations is not available.

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14 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-62.** REFERENCE: SCHEDULE BV-1, SCHEDULE C-2. PROVIDE THE  
2 EQUIVALENT OF “NON-STORMWATER ONLY” FOR 2019, 2020, 2021,  
3 AND 2022 FOR:  
4 A. ALL CUSTOMER ASSISTANCE PROGRAM PARTICIPANTS  
5 B. TAP PARTICIPANTS;  
6 C. LOW-INCOME NON-TAP CUSTOMERS (DEFINING WHAT A LOW-  
7 INCOME NON-TAP CUSTOMER IS).  
8

9 **RESPONSE:**

10 Please see response to PA-II-60 and 61.  
11

12 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-63.** REFERENCE: SCHEDULE BV-1, SCHEDULE C-1A. CONFIRM OR DENY.  
2 LINES 1, 2 AND 3 INCLUDE BOTH LOW-INCOME NON-TAP  
3 PARTICIPANTS AND NON-LOW-INCOME CUSTOMERS. IF ANYTHING  
4 OTHER THAN AN UNQUALIFIED CONFIRMED, PLEASE PROVIDE A  
5 DETAILED EXPLANATION OF THE BASIS FOR THE RESPONSE.  
6

7 **RESPONSE:**

8 Confirm. Table C-1A reflects the system-wide projections under base rates for all  
9 customers prior to TAP discounts and TAP-R surcharge revenues.  
10

11 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-64.** REFERENCE: SCHEDULE BV-1, SCHEDULE C-1A. CONFIRM OR DENY.  
2 IF TAP PARTICIPATION INCREASES, THE DOLLAR FIGURES IN LINES 1,  
3 2 AND 3 WILL DECREASE. IF ANYTHING OTHER THAN AN  
4 UNQUALIFIED AFFIRMED, PROVIDE A DETAILED EXPLANATION OF  
5 THE BASIS FOR THE RESPONSE.  
6

7 **RESPONSE:**

8 Deny. Table C-1A reflects the system-wide projections under base rates for all customers  
9 prior to TAP discounts and TAP-R surcharge revenues.  
10

11 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-65.** REFERENCE: SCHEDULE BV-1, SCHEDULE C-1B.

2 A. ARE THE DOLLAR FIGURES IN LINES 1, 2 AND 3 BILLINGS OR  
3 RECEIPTS?

4 B. IF THE FIGURES ARE RECEIPTS, ARE THE RECEIPTS DERIVED BY  
5 MULTIPLYING A LARGER BILLING DOLLAR AMOUNT BY THE  
6 PROPOSED COLLECTABILITY FACTOR OF 96.98%? IF SO, PROVIDE  
7 THE NUMBERS FOR LINES 1, 2 AND 3 AGAINST WHICH THE  
8 COLLECTABILITY FACTOR WAS APPLIED. IF SOME OTHER  
9 COLLECTABILITY FACTOR WAS USED, IDENTIFY THAT  
10 COLLECTABILITY FACTOR AND EXPLAIN WHY IT WAS USED IN  
11 LIEU OF THE 96.98%.

12 C. IF THE DOLLAR FIGURES PRESENTED IN LINES 1, 2 AND 3 ARE  
13 BILLINGS, ARE THE ACTUAL EXPECTED RECEIPTS DERIVED BY  
14 MULTIPLYING THESE LINES BY THE PROPOSED  
15 COLLECTABILITY FACTOR OF 96.98%? IF SO, PROVIDE THE  
16 EXPECTED RECEIPTS TAKING INTO ACCOUNT THE  
17 COLLECTABILITY FACTOR. IF SOME OTHER COLLECTABILITY  
18 FACTOR WAS USED, IDENTIFY THAT COLLECTABILITY FACTOR  
19 AND EXPLAIN WHY IT WAS USED IN LIEU OF THE 96.98%.

20  
21 **RESPONSE:**

22 A. Receipts

23 B. Refer to the response and response attachment to PA-II-54.

24 C. Not applicable, see response to items A and B.

25  
26  
27 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
28

1 **PA-II-66.** CONFIRM OR DENY. THE NUMBERS IN TABLE C-1, LINES 1, 2 AND 3  
2 ARE DERIVED BY SUMMING LINES 1, 2 AND 3 FROM TABLE C-1A AND  
3 C-1B. IF ANYTHING OTHER THAN AN UNQUALIFIED CONFIRMED,  
4 PLEASE PROVIDE A DETAILED EXPLANATION OF THE DERIVATION  
5 OF THE NUMBERS IN TABLE C-1, LINES 1, 2 AND 3.  
6

7 **RESPONSE:**

8 Confirm.  
9

10 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-67.** CONFIRM OR DENY. THE COLLECTION FACTORS USED FOR TABLE C-  
2 2 ARE A BLEND OF BILLINGS AND COLLECTIONS FROM LOW-INCOME  
3 CUSTOMERS AND BILLINGS AND COLLECTIONS FROM NON-LOW-  
4 INCOME CUSTOMERS. IF ANYTHING OTHER THAN AN UNQUALIFIED  
5 CONFIRMED, PLEASE PROVIDE A DETAILED EXPLANATION OF THE  
6 BASIS FOR THE RESPONSE.

7  
8 **RESPONSE:**

9 Deny. Collection factors are not used directly in the derivation of Table C-2. Line 9 of  
10 Table C-2 reflects the total revenue projections as presented in Lines 1 to 15 of Table C-1  
11 which includes retail service revenues, wholesale revenues and miscellaneous revenues.  
12 Collection factors are not used in the derivation of wholesale revenues or miscellaneous  
13 revenues.

14  
15 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-II-68.** IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD,  
2 PLEASE PROVIDE A DETAILED EXPLANATION OF WHICH CUSTOMERS  
3 ARE INCLUDED IN THE POPULATION LABELLED “TAP CUSTOMERS  
4 OUTSIDE OF TAP ENROLLMENT.”

5  
6 **RESPONSE:**

7 Refer to PA-I-15.

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

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1 **PA-II-69.** IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD,  
2 PLEASE PROVIDE A DETAILED EXPLANATION OF THE DISTINCTION  
3 BETWEEN “TAP CUSTOMERS OUTSIDE OF TAP ENROLLMENT” IN THE  
4 YEARS PRIOR TO THE IMPLEMENTATION OF TAP AND “TAP  
5 CUSTOMERS OUTSIDE OF TAP ENROLLMENT” IN THE YEARS  
6 SUBSEQUENT TO THE IMPLEMENTATION OF TAP.  
7

8 **RESPONSE:**

9 In all cases, “TAP Customers Outside of TAP” is defined as described in response to PA-  
10 I-15.  
11

12 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-II-70.** IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD,  
2 PLEASE PROVIDE A DETAILED EXPLANATION OF HOW “TAP  
3 CUSTOMERS OUTSIDE OF TAP ENROLLMENT” WERE IDENTIFIED  
4 PRIOR TO FISCAL YEAR 2018.

5

6 **RESPONSE:**

7 Refer to PA-II-69.

8

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

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1 **PA-II-71.** IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD,  
2 PLEASE PROVIDE A DETAILED EXPLANATION OF WHY CUSTOMERS  
3 WHO ARE LABELLED “SENIOR CITIZEN DISCOUNT” ARE COMBINED  
4 WITH CUSTOMERS WHO ARE LABELLED “TAP” FOR PURPOSES OF  
5 CALCULATING COLLECTABILITY.  
6

7 **RESPONSE:**

8 In the Low-Income Billing & Payments report, provided in response to PA-I-15, one  
9 category of billings and relevant payments is labeled “TAP (including TAP and Senior  
10 Citizens Discount).” This category includes all TAP bills, even those for customers that  
11 are also designated as Senior Citizen Discount customers within the billing system. See  
12 also the written response to PA-I-15.  
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14 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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**PA-II-72.** PLEASE PROVIDE A RESTATEMENT OF THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD WITH TAP CUSTOMERS SEPARATELY STATED (I.E., NOT COMBINED WITH “SENIOR CITIZEN DISCOUNT”).

**RESPONSE:**

Please refer to the response to PA-II-71. All billings included in “TAP (including TAP and Senior Citizens Discount)” are TAP billings.

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