

**BEFORE THE
PHILADELPHIA WATER, SEWER, AND STORM WATER RATE BOARD**

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater, and Stormwater Rates and Related Charges	:	Fiscal Years 2024 – 2025 Rates and Charges to Become Effective September 1, 2023 and September 1, 2024
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**PUBLIC ADVOCATES DISCOVERY REQUESTS
&
REQUESTS FOR PRODUCTION OF DOCUMENTS**

SET VI

Instructions:

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

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

PA-VI-1. Please identify the address and telephone number of each PWD and/or WRB customer service center that has been open to the public within the most recent 24 months. If there have been time periods in which such centers were not open to the public, for each center, identify which dates those centers were closed.

PA-VI-2. For each customer service center currently open to the public, please identify the days and hours for each center in which:

- a. The public may walk-in to make a payment;
- b. The public may walk-in to negotiate a payment plan;
- c. The public may walk-in to address a pending nonpayment termination;
- d. The public may walk-in to apply to be a occupant and/or tenant customer;
- e. The public may call-in to talk with a PWD representative;
- f. The public may call-in to make a payment.

- PA-VI-3. For each customer service center open to the public within the most recent 24 months, please identify:
- a. The number of customer applications received, disaggregated by homeowner, tenant, and occupant;
 - b. The number of customer applications denied disaggregated by homeowner, tenant and occupant and disaggregated further by reason for the denial.
- PA-VI-4. For each customer service center open to the public within the most recent 24 months, please identify the number of deferred payment arrangements entered into disaggregated by the type of arrangement (e.g., standard, extended, TAP).
- PA-VI-5. For each customer service center open to the public within the most recent 24 months, by month for the past 24 months, please provide:
- a. The number of budgeted full-time staff positions to serve the public;
 - b. The actual number of full-time staff positions to serve the public;
 - c. The number of budgeted part-time staff positions to serve the public;
 - d. The number of actual part-time staff positions to serve the public.
- PA-VI-6. For each customer service center open to the public within the most recent 24 months, by month for the past 24 months, please provide:
- a. The number of customer assistance program applications taken;
 - b. The number of customer assistance program applications denied, by reason for the denial;
 - c. The number of customer assistance program applications approved by program for which the customer was approved.
- PA-VI-7. For each customer service center open to the public within the past 24 months, by month for each of the past 24 months, please provide the number of visits disaggregated by the reason for the visit (e.g., make payment, negotiate payment arrangement; file complaint; apply for customer assistance program, etc.).
- PA-VI-8. For each customer service center open to the public within the past 24 months, by month for each of the past 24 months, please provide:
- a. The number of tenant applications taken;
 - b. The number of tenant applications denied disaggregated by reason for the denial.
- PA-VI-9. For each customer service center open to the public within the past 24 months, by month for each of the past 24 months, please provide:
- a. The number of occupant applications taken;

- b. The number of occupant applications denied disaggregated by reason for the denial.

PA-VI-10. By month for the months October 2020 to present inclusive, please provide in Excel format:

- a. The number of TAP participants with a pre-program arrearage balance which balance is subject to future forgiveness;
- b. The number of TAP participants with a pre-program arrearage balance which balance is subject to future forgiveness and which balance had been made subject to a lien;
- c. The dollars of TAP pre-program arrearage balances which balances are subject to future forgiveness and which balances have been made subject to a lien.

PA-VI-11. Please provide a detailed description of what occurs to a lien for an unpaid PWD bill if a PWD customer enrolls in TAP with the customer's pre-program arrears subject to future forgiveness.

PA-VI-12. By year for the years Fiscal Year 2020, 2021, 2022 and 2023 (YTD), in Excel format, please provide:

- a. The number of liens satisfied;
- b. The number of liens vacated;
- c. The dollars of liens satisfied;
- d. The dollars of liens vacated.

PA-VI-13. By year for the years Fiscal Year 2020, 2021, 2022, and 2023 (YTD), in Excel format, please provide:

- a. The number of active TAP accounts for which a new lien was perfected while the customer was an active TAP participant;
- b. The number of active TAP accounts for which a new lien was perfected prior to the time the customer became an active TAP participant;
- c. The number of active TAP accounts whose lien was satisfied while the customer was an active TAP participant;
- d. The number of active TAP accounts whose lien was vacated while the customer was an active TAP participant;
- e. The dollars of TAP accounts for which a new lien was perfected while the customer was an active TAP participant;
- f. The dollars of TAP accounts whose lien was satisfied while the customer was an active TAP participant;
- g. The dollars of TAP accounts whose lien was vacated while the customer was an active TAP participant;

PA-VI-14. With respect to the use of sequestration as a collection device for water arrears, please provide by month for Fiscal Years 2020, 2021, 2022, and 2023 (YTD):

- a. The number of petitions filed seeking Court appointment of a sequestrator.
- b. The number of individual properties with funds that were sequestered;
- c. The number of individual properties with funds that were not sequestered;
- d. The number of individual properties where there was a customer enrolled in TAP at the time the petition was filed;
- e. The number of individual properties that enrolled in TAP after the petition was filed;
- f. The number of individual properties that were enrolled in the tax hardship program codified at Philadelphia Code §19-1305 at the time the petition was filed;
- g. The number of individual properties that enrolled in the tax hardship program codified at Philadelphia Code §19-1305 after the petition was filed;
- h. The average dollars of arrears on sequestered properties;
- i. The average dollars of collections on sequestered properties.

PA-VI-15. Please provide a detailed explanation of how PWD/WRB determines if a property is a rental property subject to sequestration.

PA-VI-16. Reference PWD Statement 5 at Q&A 14.

- a. Should this testimony be read to mean that in each sequestration proceeding, the City seeks court-appointment of a sequestrator to collect both outstanding tax and water debt?
- b. Of the sequestration petitions filed in FY 2020, 2021, and 2022, what percentage sought appointment of a sequestrator with authority to collect both outstanding tax and water debt?

PA-VI-17. By month for each month since October 2021, provide in Excel format:

- a. By 9-digit zip code, the number of nonpayment termination notices issued to residential customers;
- b. By 9-digit zip code since October 2021, the number of nonpayment terminations for residential customers.

PA-VI-18. By month for the most recent 24 months available, in Excel format, please provide:

- a. The number of LIHWAP recipients who were not active TAP participants;
- b. The dollars of LIHWAP assistance received by customers who were not active TAP participants;
- c. The number of LIHWAP recipients who were tenants;

- d. The number of LIHWAP recipients who were occupants;
- e. The dollars of LIHWAP benefits received by tenants;
- f. The dollars of LIHWAP benefits received by occupants;
- g. The number of LIHWAP recipients whose name did not match the customer's name at the time LIHWAP was received;
- h. The dollars of LIHWAP benefits to recipients whose name did not match the customer's name at the time LIHWAP was received.

PA-VI-19. Please provide a detailed description of what PWD/WRB did when a person received LIHWAP and the customer's name did not match the name of the LIHWAP recipient.

PA-VI-20. By month for the most recent 24 months available, in Excel format, please provide:

- a. The number of accounts assigned to collection agencies disaggregated by the name and address of the collection agency;
- b. The dollars assigned to collection agencies disaggregated by the name and address of the collection agency;
- c. The number of accounts on which a payment was collected by a collection agency disaggregated by the name of the collection agency;
- d. The dollars of payments collected by a collection agency disaggregated by the name of the collection agency;
- e. The fees paid to a collection agency disaggregated by the name of the collection agency;
- f. The number of accounts which were removed from the collection agency without payment disaggregated by the name of the collection agency;
- g. The dollars of arrearages which were removed from the collection agency without payment disaggregated by the name of the collection agency.

PA-VI-21. For each collection agency to whom unpaid balances were assigned within the immediately preceding 24 months, please provide a copy of the contract with the collection agency.

PA-VI-22. By month for the most recent 24 months available, in Excel format, please provide:

- a. The number of accounts assigned to a third party entity to collect dollars through the sequestration process disaggregated by the name of the third party entity;
- b. The dollars assigned to third party entity disaggregated by the name and address of the third party entity for whom accounts were assigned to collect dollars through the sequestration process;

- c. The number of accounts on which a payment was collected by a third party entity through the sequestration process, disaggregated by the name of the third party entity;
- d. The dollars of payments collected by a third party entity through the sequestration process, disaggregated by the name of the third party entity;
- e. The fees paid to each third party entity collecting unpaid balances through the sequestration process, disaggregated by the name of the third party entity;
- f. The number of accounts which were removed after having been assigned to a third party entity for collection through the sequestration process, which removal occurred without any sequestration payments received, disaggregated by the name of the third party entity;
- g. The dollars of arrearages which were removed from the third party entity after having been assigned to the entity for collection through the sequestration process, which removal occurred without any sequestration payments received, disaggregated by the name of the third party entity.

PA-VI-23. By month for the most recent 24 months available, in Excel format, please provide:

- a. The number of accounts assigned to a third party entity to collect dollars through the municipal courts (other than through liens or sequestration) disaggregated by the name of the third party entity;
- b. The dollars assigned to such a third party entity disaggregated by the name of the third party entity;
- c. The number of accounts on which a payment was collected by a third party entity through the municipal courts (other than through liens or sequestration), disaggregated by the name of the third party entity;
- d. The dollars of payments collected by a third party entity through the municipal courts (other than through liens or sequestration), disaggregated by the name of the third party entity;
- e. The fees paid to each third party entity collecting unpaid balances through the municipal courts (other than through liens or sequestration), disaggregated by the name of the third party entity;
- f. The number of accounts which were removed after having been assigned to a third party entity for collection through the municipal courts (other than through liens or sequestration), which removal occurred without any payments received, disaggregated by the name of the third party entity;
- g. The dollars of arrearages which were removed from the third party entity after having been assigned to the entity for collection through the municipal courts (other than through liens or sequestration), which removal occurred without any payments received, disaggregated by the name of the third party entity.

PA-VI-24. By Fiscal Year, for each of the next three Fiscal Years, please identify the full dollar amount of operational savings expected to be generated by increasing the dollar balance for nonpayment terminations to \$1,000.

PA-VI-25. By Fiscal Year, for each of the next three Fiscal Years, please identify the dollar impact on collections expected to be generated by increasing the dollar balance for nonpayment terminations to \$1,000.

PA-VI-26. By month for the immediately preceding 24 months, please provide in Excel format:

- a. The number of accounts that were not active TAP participants with an unpaid arrearage balance of \$1,000 or more;
- b. The number of active TAP participants with an unpaid arrearage balance of \$1,000 or more.

PA-VI-27. By month for the immediately preceding 24 months, please provide in Excel format, the number of residential accounts that were not terminated for nonpayment while carrying an unpaid balance of \$1,000 or more in that month:

- a. For active TAP participants;
- b. For residential customers who were not TAP participants.

PA-VI-28. By month for the immediately preceding 24 months, please provide in Excel format the number of residential accounts that were terminated for nonpayment, but that would not have been terminated had the minimum dollar balance used to trigger a nonpayment termination been \$1,000.

PA-VI-29. By month for the immediately preceding 24-months, please provide in Excel format, the number of residential accounts that were terminated for nonpayment of a balance of \$1,000 or more that were reconnected.

PA-VI-30. By month for the immediately preceding 24-months, please provide in Excel format, for the residential accounts that were terminated for nonpayment of a balance of \$1,000 or more and that were subsequently reconnected:

- a. The average dollar balance at the time of termination;
- b. The average dollar balance remaining on the account after reconnection.

PA-VI-31. Please provide signed contracts and/or renewals currently in place between PWD and/or WRB and

- a. Raftelis Financial Consulting

b. Black and Veatch

PA-VI-32. Please describe any ongoing communications, collaboration, and/or discussions between PWD and/or WRB and the municipal office that determines income-eligibility for the Philadelphia tax hardship program codified at Philadelphia Code §19-1305 with respect to sharing information about income or residency eligibility between the programs.