

**RESPONSE TO**  
**PUBLIC ADVOCATE'S INTERROGATORIES (SET XI)**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**QUESTIONS 1-5**

**Dated: April 2023**

1 **PA-XI-1.** PLEASE EXPLAIN THE PROCESS FOR TRANSFERRING OUTSTANDING  
2 BALANCES BETWEEN AN OWNER'S ACCOUNT AND AN OCCUPANT  
3 CUSTOMER ACCOUNT. PLEASE SET FORTH IN DETAIL ANY  
4 DIFFERENCES IN PROCESS THAT APPLIES (A) WHEN THE OCCUPANT  
5 HAS PERMISSION TO RESIDE IN THE PROPERTY FROM A LIVING  
6 OWNER, OR (B) WHEN THE OCCUPANT QUALIFIES BASED ON THEIR  
7 INTESTATE INTEREST IN THE PROPERTY.

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9 **RESPONSE:**

10 When an application for an occupant account is approved, the owner's outstanding balance  
11 is automatically transferred into the new occupant account per PWD Regulations 100.2.  
12 There are no differences in the process that apply to (A) or (B) above.

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14 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-XI-2.** PLEASE EXPLAIN THE PROCESS FOR TRANSFERRING OUTSTANDING  
2 BALANCES BETWEEN AN OWNER'S (OR LANDLORD AGENT'S)  
3 ACCOUNT AND A RESIDENTIAL TENANT'S ACCOUNT. PLEASE SET  
4 FORTH IN DETAIL ANY DIFFERENCES IN PROCESS THAT APPLIES (A)  
5 BASED ON THE DATE OF APPLICATION, OR (B) BASED ON THE  
6 EFFECTIVE DATE OF THE LEASE.

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8 **RESPONSE:**

9 The standard procedure is that a tenant account begins accruing a balance as of the date it  
10 is approved and does not transfer previous balances from a landlord's account. Generally,  
11 a tenant account is not retroactive, but begins as of the date the tenant account is approved.  
12 To place any previously unpaid bills in the tenant's name, the tenant must contact the Law  
13 Department and request the balance be transferred.

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15 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-XI-3.** PLEASE EXPLAIN ANY PROCESS FOR TRANSFERRING OUTSTANDING  
2 BALANCES BETWEEN AN OWNER'S ACCOUNT AND AN OCCUPANT'S  
3 ACCOUNT THAT OCCURS (WITHOUT CUSTOMER REQUEST) WHEN  
4 THE OCCUPANT ENROLLS IN TAP.

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6 **RESPONSE:**

7 When an occupant account is approved, all previous debt accrued on the owner's account  
8 is transferred to the occupant account as principal debt. Once approved for TAP, this debt  
9 is then treated as protected pre-TAP arrears while the customer remains on TAP.

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

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1 **PA-XI-4.** PLEASE EXPLAIN ANY PROCESS FOR TRANSFERRING OUTSTANDING  
2 BALANCES BETWEEN AN OWNER'S (OR LANDLORD AGENT'S)  
3 ACCOUNT AND A TENANT'S ACCOUNT THAT OCCURS (WITHOUT  
4 CUSTOMER REQUEST) WHEN A TENANT ENROLLS IN TAP.

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6 **RESPONSE:**

7 Generally, a tenant account is not retroactive, but begins as of the date the tenant account  
8 is approved. There is no automatic process to transfer landlord's past debt into a tenant  
9 account's pre-TAP arrears when the tenant is approved for TAP. In order to place any  
10 previously unpaid bills in the tenant's name, the tenant must contact the Law Department  
11 and request the balance be transferred.

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13 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau  
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1 **PA-XI-5.** PLEASE DESCRIBE THE MANNER IN WHICH PRE-TAP ARREARS IS  
2 CALCULATED FOR:  
3 A. AN OWNER CUSTOMER;  
4 B. A TENANT CUSTOMER; AND  
5 C. AN OCCUPANT CUSTOMER.  
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7 **RESPONSE:**

8 Refer to responses provided to PA-I-56 for a description of calculation of pre-program (pre-  
9 TAP) arrears. The treatment of all customers approved for TAP is the same, regardless of  
10 customer status.  
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12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Raftelis Financial  
13 Consultants, Inc.  
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