

**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**

**PUBLIC ADVOCATES DISCOVERY REQUESTS
&
REQUESTS FOR PRODUCTION OF DOCUMENTS**

For the following requests, please reference the Joint Petition for Partial Settlement, adopted by the Philadelphia Water, Sewer and Storm Water Rate Board in its June 16, 2021 Rate Determination, available at <https://www.phila.gov/media/20210618105014/2021-General-Rate-Determination-as-filed-with-Records-Dept-20210616.pdf>.

PA-XII-1. Please provide a complete list of all outreach in the Black community undertaken “in concert with community organizations” between the dates of June 16, 2021 and the present. Include in this list the date of the outreach, the mechanism by which PWD determined it was directed to “the Black community,” the persons/households/customers reached by the outreach, and the community organization or organizations PWD worked “in concert with”.

PA-XII-2. Please provide a complete list of “community meetings, summits or other gatherings” organized by PWD between the dates of June 16, 2021 and the present at which “community meetings, summits or other gatherings” organized by PWD were used to “communicate the availability of assistance for PWD customers.”

- a. Separately identify each “proposal” raised at each such community meeting, summit or other gathering;
- b. Separately document the manner in which such “proposals” raised at such community meeting, summit or other gathering was “considered” by PWD.

PA-XII-3. Please provide a complete list of meetings with “Black community leaders and Black grassroots community members” organized by PWD between the dates of June 16, 2021 and the present, at which meetings PWD discussed with such “Black community leaders and Black grassroots community members” “what aspects of processes related to TAP application, enrollment and recertification can be improved upon.” Include in this list the Include in this list the date of the meeting, the location of the meeting, the names and contact information for both the “Black community leaders” and the “Black

grassroots community members” with whom PWD met, and any meeting minutes or written summary of the discussion which occurred at each meeting.

- a. Separately identify each “proposal” raised at each such meeting;
- b. Separately document the manner in which such “proposals” raised at such meetings were “considered” by PWD.

PA-XII-4. Please provide each proposal made by PWD to the City’s Office of Immigrant Affairs, or received by PWD from the City’s Office of Immigrant Affairs, between the dates of June 16, 2021 and the present, with respect to PWD’s commitment to “consider changes in its language access plans.” Separately identify each staffperson in the city’s Office of Immigrant Affairs with whom PWD met with, or conferred with. Separately provide a complete list of the dates and locations of each meeting with the City’s Office of Immigrant Affairs, along with a complete description of the subject matter of each meeting.

PA-XII-5. Please provide a copy of all “customer service-related forms/applications” that PWD has translated into “various additional languages” between the dates of June 16, 2021 and the present. Provide copies of both the forms/applications translated and the actual translations that have been made.

PA-XII-6. Please provide a copy of all written documents presenting or otherwise discussing PWD’s evaluation of “the feasibility of extending the moratorium [on PWD shutoffs] evaluating, among other considerations, public health guidelines and economic conditions.”

- a. For each such document provided, please identify by page number the place or places in the document(s) where: (a) “public health guidelines” were evaluated; and (b) “economic conditions” were evaluated.
- b. For each such document, please identify the specific “public health guideline” that was considered.

PA-XII-7. Please provide a copy of all procedures, manuals, staff training documents, payment plan description, or other written document or material, documenting PWD’s “more flexible terms for payment arrangements” offered “to help PWD customers bring their accounts current.” Separately provide the specific time period subsequent to June 16, 2021 during which those “more flexible terms for payment arrangements” were made available.

PA-XII-8. Please provide by month for the months June 2021 to the present the number of PWD customers entering into the payment arrangements that PWD agreed it “will

provide with more flexible terms,” disaggregated by the term of the payment arrangement provided.

PA-XII-9. Please provide a detailed description of each way in which, subsequent to June 16, 2021, PWD modified its payment arrangements to comply with its commitment that it “will provide more flexible terms for payment arrangements to help PWD customers bring their accounts current.” Indicate, for example, whether the length of the payment arrangement was made “more flexible,” whether downpayment requirements were made “more flexible,” whether the ability to renegotiate payment arrangements was made “more flexible,” whether the ability to cure missed payment was made “more flexible,” and the like.

PA-XII-10. Please provide, for all “payment arrangements” with “more flexible terms” that PWD agreed that it “will provide. . .to help PWD customers bring their accounts current,” a side-by-side comparison of: (1) the payment arrangement terms in effect prior to June 16, 2021 that were modified by the “more flexible terms” that PWD agreed that it “will provide,” and (2) the corresponding modified “more flexible terms” that PWD agreed that it “will provide.”

PA-XII-11. Please provide a copy of PWD’s “evaluation” of “the Public Advocate’s proposals to proactively extend payment arrangements to assist customers who have fallen behind during the COVID-19 pandemic.”

PA-XII-12. Please provide copies of all written materials used, subsequent to June 16, 2021, to comply with PWD’s commitment that “PWD will conduct outreach with community organizations to ‘enroll’ customers with past due balances in suitable payment arrangements with longer repayment terms.”

PA-XII-13. Please provide a complete list of “community organizations” with whom PWD “conducted outreach. . .to ‘enroll’ customers with past due balances in suitable payment arrangements with longer repayment terms.” This list should include: (1) the name of the community organization; (2) the name and contact information of the individual who is the person at the community organization with PWD worked; and (3) a detailed description of all outreach conducted “with each community organization.”