

BEFORE THE
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

Re: Philadelphia Water Department Proposed Charges in Rates and Charges	2023 General Rate Proceeding Fiscal Years 2024 - 2025
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**PHILADELPHIA WATER DEPARTMENT’S
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO THE PUBLIC ADVOCATE, SET IV**

The Philadelphia Water Department (“Department” or “PWD”) requests that the Public Advocate provide full and complete answers to the following interrogatories and request for production of documents upon the undersigned.

Interrogatories and Requests for Production to the Public Advocate

For Public Advocate Witnesses, Roger Colton:

General Questions

1. With reference to PA Statement 3 at 57, please provide support for your statement that PWD “completely failed to comply with the 2021 Settlement provisions, and the Rate Determination’s directions regarding monthly reporting...” and note specific examples of any failure.

Response:

2. With reference to PA Statement 3 at 57-58, please provide all data used to calculate the percentage of new enrollees with pre-program arrears shown in the table on page 58.

Response:

3. With reference to PA Statement 3 at 59, please provide data and workpapers that support the charts on page 59 (titled TAP Participants with Principal AF by Month and Pct TAP Participants Receiving Principal AF).

Response:

4. With reference to PA Statement 3 at 60-61, please provide data and workpapers that support your claim that PWD's data "does not support a conclusion that TAP participants are being provided forgiveness for each 'full TAP Bill' that is paid."

Response:

5. With reference to PA Statement 3 at 61, please provide data and workpapers that support Chart on page 61 presenting “the payment coverage ratio for TAP participants for each month compared to the percentage of TAP participants receiving arrearage forgiveness.”

Response:

6. With reference to PA Statement 3 at 62, please explain the methodology or analysis used to support your conclusion that “PWD is not granting arrearage forgiveness ...directed by the City’s regulations...”.

Response:

7. With reference to PA Statement 3 at 62, please provide data and workpapers used to calculate the number of accounts making full and timely payments versus the number of accounts receiving arrearage forgiveness.

Response:

8. With reference to PA Statement 3 at 65-66, please provide data and workpapers that support your claim that PWD failed to offer retroactive forgiveness to TAP participants.

Response:

9. With reference to PA Statement at 67, please provide data and workpapers used to create Table 11 listing monthly number of TAP customers removed for failure to recertify, and please explain how this data supports your conclusion that PWD failed to offer retroactive forgiveness to TAP participants when it became effective per Regulation in July 2022.

Response:

10. With reference to PA Statement 3 at 69, please provide data and workpapers that were used to create Chart on this page (titled No. TAP Participants vs No. TAP participants with Arrears Age 121+ Days (Sept 2020 – June 2022)).

Response:

11. With reference to PA Statement 3 at 71, please provide data and workpapers that support your conclusion that 55% to 65% of TAP participants were making “full” and “timely” payments toward their TAP bills.

Response:

Respectfully submitted,

/s/ Andre C. Dasent

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Date: April 19, 2023

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