

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

**In the Matter of the Philadelphia : Fiscal Years 2024 – 2025
Water Department's Proposed : Rates and Charges to Become Effective
Change in Water, Wastewater, and : September 1, 2023 and September 1, 2024
Stormwater Rates and Related
Charges**

May 5, 2023

PUBLIC ADVOCATE

HEARING EXHIBIT

Monthly Report

**TO THE RATE BOARD AS REQUIRED BY THE
FY2022-2023 RATE DETERMINATION**

Philadelphia Water Department

December 13, 2022



City of
Philadelphia

Table 5. Denials: Applicants Not Enrolled in TAP¹ during November 2022

Outcome	Total Count	Applicants Already Participating in TAP
Denied		
Failed to meet Income and Residency Guidelines	0	0
Failed to meet Income Guidelines (no Special Hardship)	24	0
Failed to meet Residency Guidelines	21	0
Installation Type Not Eligible for TAP	0	0
Missing or Invalid Income or Residency Documentation	221	1
Missing information on application form	4	0
Not the Customer applying	27	0
Total Denials	297	1
<i>Denied for Incomplete, remained in TAP²</i>		1
<i>Denied for Cause, removed from TAP</i>		0
New Applicant Denials	296	
Enrolled in More Affordable Alternative		
Senior Citizen Discounted Bill ³	37	0
Senior Citizen Discounted Bill + Extended Payment Agreement	7	0
Regular Bill ³	5	0
Regular Bill + Extended Payment Agreement	42	0
WRBCC Agreement	0	0
Total More Affordable Alternative Placements	91	0
Other Outcomes		
Customer Withdrew Application	0	0
Data Transfer ⁴	0	0
Total Other Outcomes	0	0

As stated in the previous section, the introduction of “TAP Pause” will address some concerns about the impact of Program Turnover, as customers leaving and returning to the program will pick up where they left off on earning principal and penalty forgiveness, rather than starting anew.

¹ An annualized version of this report is included in the Annual Report to the Mayor On The Tiered Assistance Program (TAP), “Table 4. Applicants Not Enrolled.” This monthly data was reported on December 1, 2022.

² Apart from recertification, customers in TAP who reapply and have their application denied for being incomplete are not removed from TAP. Only those who are denied for cause or are approved for a more affordable alternative are removed from TAP.

³ Senior Citizen Discounted Bill or Regular Bill may also include a standard payment agreement.

⁴ When customers had more than one application in progress at the same time, information was transferred to the newest application for processing, older applications were categorized as “Data Transfer,” and were no longer processed. Similarly, previously denied applications were transferred for re-evaluation when WRB identified available OOPA information or the customer submitted additional required documentation after denial. The subsequent approvals or denials are also captured in these figures.

Monthly Report

**TO THE RATE BOARD AS REQUIRED BY THE
FY2022-2023 RATE DETERMINATION**

Philadelphia Water Department

January 18, 2023



Table 5. Denials: Applicants Not Enrolled in TAP¹ during December 2022

Outcome	Total Count	Applicants Already Participating in TAP
<u>Denied</u>		
Failed to meet Income and Residency Guidelines	0	0
Failed to meet Income Guidelines (no Special Hardship)	19	1
Failed to meet Residency Guidelines	23	0
Installation Type Not Eligible for TAP	1	0
Missing or Invalid Income or Residency Documentation	192	0
Missing information on application form	5	0
Not the Customer applying	29	0
<u>Total Denials</u>	<u>269</u>	<u>1</u>
<i>Denied for Incomplete, remained in TAP²</i>		0
<i>Denied for Cause, removed from TAP</i>		1
<i>New Applicant Denials</i>	268	
<u>Enrolled in More Affordable Alternative</u>		
Senior Citizen Discounted Bill ³	33	0
Senior Citizen Discounted Bill + Extended Payment Agreement	6	0
Regular Bill ³	9	0
Regular Bill + Extended Payment Agreement	34	0
WRBCC Agreement	0	0
Total More Affordable Alternative Placements	82	0
<u>Other Outcomes</u>		
Customer Withdrew Application	0	0
Data Transfer ⁴	1	0
Total Other Outcomes	1	0

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³ Senior Citizen Discounted Bill or Regular Bill may also include a standard payment agreement.

⁴ When customers had more than one application in progress at the same time, information was transferred to the newest application for processing, older applications were categorized as “Data Transfer,” and were no longer processed. Similarly, previously denied applications were transferred for re-evaluation when WRB identified available OOPA information or the customer submitted additional required documentation after denial. The subsequent approvals or denials are also captured in these figures.

Monthly Report

**TO THE RATE BOARD AS REQUIRED BY THE
FY2022-2023 RATE DETERMINATION**

Philadelphia Water Department

February 24, 2023



City of
Philadelphia

Table 5. Denials: Applicants Not Enrolled in TAP⁸ during January 2023

Outcome	Total Count	Applicants Already Participating in TAP
<u>Denied</u>		
Failed to meet Income and Residency Guidelines	2	0
Failed to meet Income Guidelines (no Special Hardship)	18	0
Failed to meet Residency Guidelines	13	0
Installation Type Not Eligible for TAP	0	0
Missing or Invalid Income or Residency Documentation	156	1
Missing information on application form	1	0
Not the Customer applying	32	0
<u>Total Denials</u>	<u>222</u>	<u>1</u>
<i>Denied for Incomplete, remained in TAP²</i>		<i>1</i>
<i>Denied for Cause, removed from TAP</i>		<i>0</i>
<i>New Applicant Denials</i>	<i>221</i>	
<u>Enrolled in More Affordable Alternative</u>		
Senior Citizen Discounted Bill ¹⁰	35	0
Senior Citizen Discounted Bill + Extended Payment Agreement	7	0
Regular Bill ¹⁰	12	1
Regular Bill + Extended Payment Agreement	23	0
WRBCC Agreement	0	0
Total More Affordable Alternative Placements	77	1
<u>Other Outcomes</u>		
Customer Withdrew Application	0	0
Data Transfer ¹¹	2	0
Total Other Outcomes	2	0

As stated in the previous section, the introduction of “TAP Pause” will address some concerns about the impact of Program Turnover, as customers leaving and returning to the program will pick up where they left off on earning principal and penalty forgiveness, rather than starting anew.

⁸ An annualized version of this report is included in the Annual Report to the Mayor On The Tiered Assistance Program (TAP), “Table 4. Applicants Not Enrolled.” This monthly data was reported on February 1, 2023.

⁹ Apart from recertification, customers in TAP who reapply and have their application denied for being incomplete are not removed from TAP. Only those who are denied for cause or are approved for a more affordable alternative are removed from TAP.

¹⁰ Senior Citizen Discounted Bill or Regular Bill may also include a standard payment agreement.

¹¹ When customers had more than one application in progress at the same time, information was transferred to the newest application for processing, older applications were categorized as “Data Transfer,” and were no longer processed. Similarly, previously denied applications were transferred for re-evaluation when WRB identified available OOPA information or the customer submitted additional required documentation after denial. The subsequent approvals or denials are also captured in these figures.

Monthly Report

**TO THE RATE BOARD AS REQUIRED BY THE
FY2022-2023 RATE DETERMINATION**

Philadelphia Water Department

March 20, 2023



City of
Philadelphia

Table 5. Denials: Applicants Not Enrolled in TAP⁸ during February 2023

Outcome	Total Count	Applicants Already Participating in TAP
<u>Denied</u>		
Failed to meet Income and Residency Guidelines	1	0
Failed to meet Income Guidelines (no Special Hardship)	14	0
Failed to meet Residency Guidelines	12	0
Installation Type Not Eligible for TAP	0	0
Missing or Invalid Income or Residency Documentation	140	2
Missing information on application form	7	0
Not the Customer applying	20	0
<u>Total Denials</u>	<u>194</u>	<u>2</u>
<i>Denied for Incomplete, remained in TAP²</i>		2
<i>Denied for Cause, removed from TAP</i>		0
<i>New Applicant Denials</i>	192	
<u>Enrolled in More Affordable Alternative</u>		
Senior Citizen Discounted Bill ¹⁰	30	0
Senior Citizen Discounted Bill + Extended Payment Agreement	4	0
Regular Bill ¹⁰	9	0
Regular Bill + Extended Payment Agreement	18	0
WRBCC Agreement	0	0
Total More Affordable Alternative Placements	61	0
<u>Other Outcomes</u>		
Customer Withdrew Application	0	0
Data Transfer ¹¹	0	0
Total Other Outcomes	0	0

As stated in the previous section, the introduction of “TAP Pause” will address some concerns about the impact of Program Turnover, as customers leaving and returning to the program will pick up where they left off on earning principal and penalty forgiveness, rather than starting anew.

⁸ An annualized version of this report is included in the Annual Report to the Mayor On The Tiered Assistance Program (TAP), “Table 4. Applicants Not Enrolled.” This monthly data was reported on March 1, 2023.

⁹ Apart from recertification, customers in TAP who reapply and have their application denied for being incomplete are not removed from TAP. Only those who are denied for cause or are approved for a more affordable alternative are removed from TAP.

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¹¹ When customers had more than one application in progress at the same time, information was transferred to the newest application for processing, older applications were categorized as “Data Transfer,” and were no longer processed. Similarly, previously denied applications were transferred for re-evaluation when WRB identified available OOPA information or the customer submitted additional required documentation after denial. The subsequent approvals or denials are also captured in these figures.

1 **PA-I-85.** IN EXCEL FORMAT, PLEASE PROVIDE BY MONTH FROM JANUARY
2 2022 TO THE PRESENT, THE NUMBER OF:

- 3 A. RESIDENTIAL CUSTOMERS WHO PWD HAD IDENTIFIED AS BEING
4 PROTECTED FROM NONPAYMENT TERMINATIONS DUE TO THEIR
5 LOW-INCOME OR VULNERABLE STATUS;
6 B. THE NUMBER OF LOW-INCOME AND/OR VULNERABLE
7 CUSTOMERS WHOSE ACCOUNTS WERE TERMINATED FOR
8 NONPAYMENT.

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10 **RESPONSE:**

- 11 A. As of June 2022, when the City first completed its identification of residential
12 customers as low-income or of a vulnerable population to protect from service
13 termination due to nonpayment, there were 107,119 customers protected.
14 B. Customers identified above were protected from termination for nonpayment.

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16 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
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1 **PA-I-86.** PLEASE PROVIDE A DETAILED EXPLANATION OF THE PWD AND/OR
2 WRB PROCESS FOR DETERMINING WHETHER AND/OR WHEN IT IS
3 APPROPRIATE TO TERMINATE A RESIDENTIAL ACCOUNT FOR
4 NONPAYMENT NOTWITHSTANDING THE CUSTOMER'S STATUS AS A
5 LOW-INCOME AND/OR VULNERABLE CUSTOMER.

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7 **RESPONSE:**

8 The City's current policy is not to terminate residential accounts where the customer has
9 been determined to be in a low-income and/or vulnerable group according to other City
10 administrative data.

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12 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
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1 **PA-I-88.** PLEASE PROVIDE ALL WRITTEN INTERNAL PWD AND/OR WRB
2 PROCESSES AND PROCEDURES FOR IDENTIFYING WHETHER AND/OR
3 WHEN A CUSTOMER IS A LOW-INCOME AND/OR VULNERABLE
4 CUSTOMER.

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6 **RESPONSE:**

7 WRB collaborates with Office of Integrated Data for Evidence and Action (“IDEA”)
8 within the Managing Director’s Office to engage in data-matching of its customers with
9 other City administrative data to confirm participation in other assistance programs,
10 thereby identifying these customers as a low-income and/or vulnerable customer for
11 purposes of shutoff exemption.

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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau
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