PHILADELPHIA WATER, SEWER, AND STORM WATER
RATE BOARD PUBLIC HEARING

FRIDAY, MAY 5, 2023
9:01 A.M. TO 11:01 A.M. EDT
ZOOM TELECONFERENCE

On Friday, May 5, 2023, the following proceedings came on to be heard in the above-entitled matter before the Honorable Marlane R. Chestnut, Hearing Officer

Proceedings were reported by stenographic method by:
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May 5, 2023, 9:01 a.m. EDT

HEARING OFFICER CHESTNUT: All right. Is everybody ready to get started, then?

We'll go on the record. This is the continued hearing in the 2023 general rate proceeding of the Philadelphia Water Department. I'm Hearing Officer Marlane Chestnut.

Preliminarily, let me state that I did get your stipulation between the department, the Public Advocate and the WRB concerning the sequestration, and I assume you have proposed, because it's not final among you three, because it does not require any kind of approval from me.

MR. DASENT: That was just the heading that I used. We are in agreement on the two issues that are listed there, and we'll brief a related issue later as we study it more. Ms. Crosby is out of town and we need to evaluate the third prong of Mr. Ballenger's proposal.

But the first two elements, the occupant customers in sequestration and tenant customers in TAP that are listed in that proposed stipulation, outline areas of agreement so that we can avoid cross-examination on those issues today.

HEARING OFFICER CHESTNUT: Okay.

MR. BALLENGER: The point of all of that is just to recognize our mutual commitment to resolving issues that come up, including the issues that were presented in public input and raised by Ms. Crawley, I believe. And we just wanted to make sure that that was on the record of this proceeding since it was a subject that was addressed in testimony of both the Public Advocate and the Water Department.

As a result of the stipulation, we have no cross on those issues. So our cross has been limited to a few other subjects today, and we hope to get through them expeditiously.

HEARING OFFICER CHESTNUT: Okay.

MR. BALLENGER: And just so you know, Joline Price will be taking the lead this

morning for the Public Advocate.

HEARING OFFICER CHESTNUT: Are there any other preliminary procedural matters anyone wants to bring up?

MR. DASENT: Nothing more.

MR. HAVER: Your Honor didn't finish her discussion about the transcript yesterday. So where does that stand?

HEARING OFFICER CHESTNUT: The transcript? The way I understand it is we're on two-day service. When we get it, we will post it on our website. I think we have -- I think we're supposed to get the transcript for Wednesday today. I'll see that they're posted as quickly as I can.

MR. HAVER: Thank you.

HEARING OFFICER CHESTNUT: Anything else, then?

MR. DASENT: Nothing more.

HEARING OFFICER CHESTNUT: Mr. Dasent, I guess we're going to start with your witness, then. Witnesses.

MR. DASENT: Thank you, Your Honor. The witnesses today are the -- what we've characterized as the WRB Panel, and it

includes Susan Crosby, the deputy commissioner at the Water Revenue Bureau, and also -- deputy revenue commissioner in charge of the Water Revenue Bureau.

And in addition to that we have RFC consultants, Raftelis Financial Consultants, including Jon Davis, Henrietta Locklear, and Jennifer Tavantzis. I'll get it right eventually. And that's it.

The witnesses are tendered for cross-examination.

HEARING OFFICER CHESTNUT: All right. Thank you. I'd like each witness to identify themselves for the record stating by whom you are employed -- I mean, you did say who Ms. Crosby is. I guess that's sufficient.

But maybe the Raftelis people can identify their role with the company.

MR. DASENT: Jon?

MR. PILKINGTON DAVIS: My name is Jon Davis. I'm an executive vice president with Raftelis, and I've worked with PWD and WRB for several years through this process.

MR. DASENT: Henrietta?

MS. LOCKLEAR: I'm Henrietta

Locklear. I'm a vice president with Raftelis.

MR. DASENT: Jen?

MS. TAVANTZIS: Good morning. My name is Jennifer Tavantzis. I'm a senior manager with Raftelis Financial Consultants.

HEARING OFFICER CHESTNUT: Okay. Thank you. Ms. Price?

MS. PRICE: Thank you.

And before we get started, I circulated maybe a little late last night a hearing exhibit for today.

Andre, was that circulated to the witnesses?

MR. DASENT: Yes, it was. Thank you for doing that.

WATER REVENUE BUREAU PANEL

CROSS-EXAMINATION BY MS. PRICE

MS. PRICE: To start off, on page 4 of your rebuttal testimony, you state that the department has taken several steps to make it easier to document eligibility for TAP.

Do you see that?

HEARING OFFICER CHESTNUT: Wait, wait, wait. I'm sorry. You have got to let me get that pulled up. That's not in your

hearing exhibit, is it?

MS. PRICE: Sorry, no, that's the rebuttal. It's Rebuttal Statement 3, PWD rebuttal statement.

MR. DASENT: And what page?

MS. PRICE: Four.

MR. DASENT: Thank you.

HEARING OFFICER CHESTNUT: PWD Rebuttal Statement 3, page 4.

Okay, I'm sorry. Line?

MS. PRICE: 13.

HEARING OFFICER CHESTNUT: 13? Okay. Got it.

MS. PRICE: Okay. So again, you state that the department has taken several steps to make it easier to document eligibility for TAP.

Do you see that?

MR. DASENT: And is that directed to Ms. Crosby?

MS. PRICE: Whoever wants to answer it, I guess.

MS. CROSBY: Good morning. Before I begin my testimony, I would like to extend my thanks to the Hearing Officer and to the

parties for working around my travel schedule and allowing me to testify on a shortened time frame this morning so that I can catch my flight back home.

Can you give me the line number one more time, Ms. Price?

MS. PRICE: Yeah, it's page 4, line 13. It's the paragraph that starts with line 13.

MS. CROSBY: Yes.

MS. PRICE: And you state that those steps include making it easier to document income and making it easier to document residency.

Do you see that?

MS. CROSBY: Yes.

MS. PRICE: Can you explain what those steps are?

MS. CROSBY: Yes. We created a -- with our review -- our TAP customer assistance team and with our internal discussions to reduce the number of documents that the staff members who are reviewing the applications are looking for. So in one instance they were looking for two proofs of income. They're now

looking for one proof of income.

We went ahead and changed those review policies internally with the -- knowing that it takes a longer time frame to update our paper application, our web-based application, the regulations and all of those things. So we wanted to deploy that new guidance to the staff who were reviewing the applications first.

MS. PRICE: And these modifications became effective in April; correct? April 2023?

MS. CROSBY: Correct. 2023.

MS. PRICE: Yes, 2023.

And if I can point you to the hearing exhibit.

MS. CROSBY: If you could display it to me on the screen. As I said, I'm traveling and I don't have the ability to view it. Because I don't --

MS. PRICE: I don't think we have the ability to screen share.

HEARING OFFICER CHESTNUT: I don't think we can screen share.

MS. CROSBY: Then you'll have to walk

me through it, please.

MS. DOBI: Hi, this is Heather. I can turn on screen share if necessary.

MR. BALLENGER: I think that would be helpful just for the morning. And I can -- Joline, if you'd like, I can share it on my side.

MS. PRICE: Yeah.

MR. BALLENGER: I'm trying to locate that.

MS. DOBI: You should be able to do so now.

MR. BALLENGER: Thank you.

HEARING OFFICER CHESTNUT: Okay.

MR. BALLENGER: Does everyone see the hearing exhibit?

MS. CROSBY: Yes.

MR. BALLENGER: Let me know where you need me to go, Joline.

MS. PRICE: So in this hearing exhibit, pages 1 through 8 are excerpts from the monthly reports from the Water Department to the Rate Board from November 2022 through February 2023 -- for the months November 2022 through February 2023.

In each of these reports, Table 5 presents data on the number of denials of applicants not enrolled in TAP; correct?

MS. CROSBY: Yes.

MS. PRICE: And two of the reasons for denial are missing or invalid income or residency documentation and missing information on the application form.

MS. CROSBY: Yes.

MS. PRICE: And during this four-month period, these monthly reports show -- I can walk you through this or I can just add the -- tell you what the number is. It's 726 new applications denied due to missing or invalid information, subject to check.

MS. CROSBY: I'll trust your math.

MS. PRICE: Okay. PWD does not report the difference between information -- or WRB/PWD doesn't report the information between the information -- difference between the information that is missing and the information that is deemed invalid; correct?

MS. CROSBY: To the best of my knowledge, this report is created by the

Raftelis team using the information from our CAMP application processing system. So I am not able to answer specifics regarding this portion of the report.

MS. PRICE: Is someone from Raftelis able to just answer that you're not -- you don't report the difference between missing and invalid?

MS. TAVANTZIS: We do not report those separately, that is correct.

MS. PRICE: And then the follow-up question is, would you be able -- can you tell us how many of the 726 applications denied from November 2022 to February 2023 would not have been denied under the new procedures that became operational in April 2023?

MS. CROSBY: I am not able to.

MR. BALLENGER: Is Raftelis able to -- I'm sorry, can you hear me?

MR. DASENT: Yes.

MR. BALLENGER: Is that something that Raftelis could determine from the reporting that it has?

MR. DASENT: Henrietta or Jen?

MS. LOCKLEAR: We can provide an

estimate of that, but not in the hearing today. It would have to be afterwards.

MS. PRICE: Can we make that a transcript request?

MR. DASENT: Okay. I'll just do it TR1 for the Public Advocate.

Yes. Thank you.

MS. PRICE: Okay. I don't know, we can keep screen sharing, I guess, but moving on to a different topic.

If I can point you to page 8 of your rebuttal testimony.

MS. CROSBY: I did bring that with me.

MS. PRICE: Lines 15 to 16, you state that: Enrollment from OOPA to TAP will continue to require a degree of manual review and approval until the development is completed.

Do you see that?

MS. CROSBY: Yes.

MS. PRICE: Madam Hearing Officer, do you want us to define OOPA here?

HEARING OFFICER CHESTNUT: No, it says what it is up there, unless you want to

briefly describe it, but...

MS. PRICE: Oh, it does, it says it. I didn't see that it was up there.

Okay. And can I conclude, or can we conclude from that comment that you do not oppose Mr. Colton's recommendation that WRB pursue automatic enrollment through that?

MS. CROSBY: No. We actually have that planned.

MS. PRICE: And when do you expect this development to be completed?

MS. CROSBY: I can't give a specific timeline, and that's because the tax side is a different department that I do not have oversight of. I do know that they're currently working on a prequalification program for their Senior Freeze Program, and that any work with us will have to wait until their development and staff resources are available after that initiative.

MS. PRICE: And what more, if anything, would a customer need to do to enroll in TAP once this class enrollment is completed?

MS. CROSBY: I don't know. As I

said, their development and staff resources are still committed to that other project. So we haven't developed a requirements document to flush out what, if anything, would be needed from the customer.

MS. PRICE: Is the goal that as little as -- that nothing would be needed from the customer?

MS. CROSBY: That's always the ultimate goal, yes.

MS. PRICE: Okay. So also on page 8 of your rebuttal testimony, at lines 18 through 20, you state that: The City is continuing development of data-sharing processes with the IDEA office to prequalify eligible customers into TAP based on other City administrative data that verify eligibility.

Do you see that?

MS. CROSBY: Yes.

MS. PRICE: And then at lines 22 to 25, you state that: Necessary data-sharing agreements have been approved by the law department, and the various departments are working on the technological and operational

aspects needed for prequalification for a program of this size. The City estimates that this program should be under way by the end of the fiscal year.

Do you see that?

MS. CROSBY: Yes. And that is an error. It should say next fiscal year. So I don't know if an errata sheet needs to be created, but it's next fiscal year. So that would be June 30th of 2024.

MS. PRICE: All right. I defer to the Hearing Officer on whether an errata would be needed on this.

HEARING OFFICER CHESTNUT: I'll leave it up to Mr. Ballenger and Ms. Price. I mean, it's stated on the record here.

MS. PRICE: Yeah, if it's stated on the record, I don't think we'll require a -- right? Yeah.

MR. BALLENGER: Yes.

MS. PRICE: Okay. And what do you mean by the word "prequalification"?

MS. CROSBY: Yes. So auto enrollment, to me, means that it happens without any human touch. It's completely

automated. And that's not what our design is. Our design is to have the information from the -- from our outside data sources put into our CAMP application processing system to prepopulate all of the necessary fields in order to make the decision.

And then, just as we do with all of our applications, we're going to have our staff review that information in a double-blind fashion to approve the appropriate program.

So we're not going to change our QA/QC process as part of this program. We want to ensure that we're doing the best and most accurate work. So it's better to say prequalification, because it is going to have a human touch.

MS. PRICE: Okay. And what would a customer need to do more to enroll in TAP once they do this pre -- you do this prequalification process?

MS. CROSBY: So this prequalification would not require action from the customer.

MS. PRICE: Okay.

MS. CROSBY: That's assuming that

they did all the front-end work to apply for the assistance program, that they -- that we're using to prequalify them with.

MS. PRICE: Right. So whatever they did to -- that meant that the City -- that the IDEA, I-D-E-A, folks got the data they had to do.

MS. CROSBY: Correct. So at some point in time the customer took an action, but in order to be prequalified into TAP, they do not have to take any additional action.

MS. PRICE: Thank you.

And can I conclude from those two comments that you do not oppose Mr. Colton's recommendation that PWD pursue automatic enrollment -- maybe prequalification is a better term here -- through IDEA and that you expect to have -- and then based on your comments, that you expect to have the program under way by the end of next fiscal year?

MS. CROSBY: Correct, with the pre -- the discernment between auto enrollment and prequalification, yes.

MS. PRICE: Yeah. All right. Turning to page 9 of your rebuttal testimony.

From lines 13 through 18 you state that: Earlier this year, the parties finalized a data sharing agreement and began to share data for use in the program. Preparation in various ways is underway to realize LIHWAP to TAP prequalification, include technology changes, staff training and communication materials. The City estimates that all necessary process -- all necessary processes will be completed in this calendar year to enroll the first group of prequalified LIHWAP TAP customers into TAP.

Do you see that?

MS. CROSBY: Yes.

MS. PRICE: And can I conclude from this testimony that you do not oppose Mr. Colton's recommendation that PWD pursue -- again, the distinction between automatic -- not automatic enrollment but this prequalification process through the Commonwealth of Pennsylvania, and that indeed, you expect this to be operational by the end of calendar year 2023?

MS. CROSBY: Correct.

MS. PRICE: All right. Your rebuttal

testimony at page 6, lines 9 through 10, states that: The detailed estimates from the 2016 rate case established that roughly 56,000 accounts are eligible for TAP enrollment.

Do you see that?

MS. CROSBY: Yes.

MS. PRICE: So to go back to the hearing exhibit, asking you to take a look at the response to P -- Public Advocate Interrogatory I-85. And that's on page 9 of the hearing exhibit.

Section A of that discovery request asked PWD to provide, by month, January 2022 to the present, the number of residential customers who PWD had identified as being protected from nonpayment terminations due to their low-income or vulnerable status.

Do you see that?

MS. CROSBY: Yes.

HEARING OFFICER CHESTNUT: I'm sorry, are you on cross-examination exhibit page 9?

MS. PRICE: Yes.

HEARING OFFICER CHESTNUT: Because that's not what mine says.

MS. PRICE: Well, you -- you have to

go to -- it's the -- it says residential customers through PWD.

HEARING OFFICER CHESTNUT: I'm looking at cross exhibit page 9, which talks about the capital budget.

MS. PRICE: This is from the one I sent around yesterday, the May 5th cross-exam.

HEARING OFFICER CHESTNUT: Right. That's what I'm looking at.

MR. BALLENGER: It's page numbered 9 on the bottom right-hand corner. It's not going be the ninth page.

HEARING OFFICER CHESTNUT: I know that. I'm looking at it. And seriously --

MR. BALLENGER: I'm showing it on screen as well.

HEARING OFFICER CHESTNUT: Do you know what, I'm looking at the wrong one. I beg your pardon. Beg your pardon.

No, wait, cross -- that's the wrong cross-examination exhibit for me, folks, so I beg your pardon.

Yeah, I do have that. I'm sorry. That was totally me.

MS. PRICE: No worries.

Okay. So PWD's response states that: As of June 2022, when the City first completed its identification of residential customers as low-income and/or of a vulnerable population to protect from service termination due to nonpayment, there were 107,119 customers protected.

Do you see that?

MS. CROSBY: Yes.

MS. PRICE: How are the terms "low-income" and "vulnerable" defined?

MS. CROSBY: We use that information from the IDEA team, and they use City databases. Subject to check, I believe it was households who had received Medicaid or homelessness prevention services within the last 12 months.

MS. PRICE: So is it your testimony that the difference between the 56,000 income-eligible customers you cited in your testimony and the 117,000 [sic] in the -- who were protected from shutoff, were -- that the difference between those two numbers were entirely non-low-income customers?

MS. CROSBY: No, that is not my

testimony.

MS. PRICE: Okay. Do you know how many of those 107,119 are low income?

MS. CROSBY: No.

MS. PRICE: Is that something that Raftelis would be able to tell us?

MS. CROSBY: I know that Raftelis, their team developed that estimate of 56,000, and the IDEA team provided the 107,000.

MS. LOCKLEAR: Yeah, we're not able to tell you about the IDEA team's 107,119.

MS. PRICE: Okay.

MS. CROSBY: Maybe I can explain. The data-sharing agreement between the department of revenue and IDEA is based in privacy. They're -- the customers who received Medicaid have a privacy right, and so they pulled information from two databases, the Medicaid database and the homelessness prevention services database, and then they blended those, they aggregated them.

And so when they gave them to us, they gave it to us as a yes/no flag. So we only know that they qualify for one or both. We don't know which one because of the privacy

rights. Because we, as revenue, are not allowed to see or have access to that source data.

MS. PRICE: Okay. Now, so you would also not be able to tell us -- right. So you're saying you wouldn't be able to tell us how many would be Medicaid and how many would be homeless prevention services.

MS. CROSBY: No. We do not receive that information from the IDEA office. We simply receive a yes/no flag that they are one of those two things.

MS. PRICE: And would you be able to tell us what the eligibility for the homeless prevention services or the -- or Medicaid would be?

MS. CROSBY: I believe Medicaid eligibility is widely known. I don't know it off the top of my head, but I could Google it. The homelessness prevention services, that could probably be a transcript request. I believe it's a department within the City that provides services to residents.

MS. PRICE: If we could, could we get a transcript request just for those sort of

parameters of what that dataset -- if there are, what the income eligibility parameters were and who served under those? Like what eligibility criteria are for those homelessness protection services; that if Ms. Crosby is right, that we can cite to publicly available information regarding Medicaid.

MR. DASENT: Okay. We will do that.

MS. PRICE: But would it be correct to assume that some portion of the 51,000 difference between the 56,000 number provided by Raftelis and the 117,119 [sic] number are low-income customers?

MS. CROSBY: Yes, that's a very safe assumption.

MS. PRICE: Okay. Finally, let's turn to Public Advocate Data Request I-88, which is page 10 of the -- no, page 11 of the hearing exhibit.

This request asked PWD to identify all written internal PWD or WRB processes and procedures for identifying whether and/or when a customer is low income or vulnerable.

Do you see that?

MS. CROSBY: Yes.

MS. PRICE: And the response was that: WRB collaborates with the Office of Integrated Data for Evidence and Action, IDEA, as we've been discussing, within the managing director's office to engage in data-matching of its customers with other City administrative data to confirm participation in other assistance programs, thereby identifying those customers as low income or vulnerable -- and/or vulnerable for purposes of shutoff exemption. Correct?

MS. CROSBY: Yes.

MS. PRICE: So are you able to tell me when the Office of Integrated Data for Evidence and Action office was created within the Philadelphia managing director's office?

MS. CROSBY: I believe it was in February of 2002 [sic]. It was created by an executive order from the mayor.

MS. PRICE: So it was prior to the 2016 rate case?

MS. CROSBY: No, it was either 2022 or 2023.

MS. PRICE: Okay. You said 2002.

2022.

MS. CROSBY: I'm sorry.

MS. PRICE: That's okay.

Okay. So I think that answers my next question, but presumably Raftelis did not consult with the IDEA office prior to developing the estimate of 56,000 TAP-eligible customers.

MS. CROSBY: To the best of my knowledge, no, it did not exist that the time, when they made their assumptions.

MS. LOCKLEAR: That's correct.

MS. PRICE: That concludes my cross-examination.

MS. CROSBY: Actually, I'm looking at my notes. It was created on March 30th, 2022 by executive order.

HEARING OFFICER CHESTNUT: Mr. Haver, do you have any questions?

MR. HAVER: Yes, I do.

CROSS-EXAMINATION BY MR. HAVER:

MR. HAVER: I want to start out by asking if any of the panel today were in these positions when Ms. McCarty was the water commissioner.

MS. CROSBY: I was not.

MR. PILKINGTON DAVIS: I was with Raftelis and working with the City at that time.

MS. LOCKLEAR: As was I.

MS. TAVANTZIS: And me too.

MR. HAVER: Thank you.

We've heard testimony that 40% of the processed water is lost, does not go through meters. What is the dollar value of that 40%?

MR. BALLENGER: Objection. This is beyond the scope of the WRB Panel testimony. They're only speaking really to TAP-related issues, customer assistance programs, and related issues raised by Mr. Colton and his testimony.

HEARING OFFICER CHESTNUT: I don't see how it has any relevance at all to their testimony.

MR. HAVER: You don't think it's of value to know the dollar value of the water lost?

HEARING OFFICER CHESTNUT: Not from these witnesses.

MR. DASENT: Thank you.

MR. HAVER: From which witnesses would it be appropriate? Because I asked the other panel; you told me to wait for the Water Revenue Panel.

MR. DASENT: I don't believe that's the case.

HEARING OFFICER CHESTNUT: I never said that.

MR. DASENT: The Operations Panel can certainly give you that answer, and if I need to bring someone back for that or give you a transcript response, we will do that.

MR. HAVER: Transcript response would be fine.

HEARING OFFICER CHESTNUT: You've already asked the amount of lost water.

MR. HAVER: I'm asking the dollar value.

HEARING OFFICER CHESTNUT: These people can't provide that.

MR. HAVER: So the Water Revenue Bureau doesn't do the billing?

MR. DASENT: It's more the operations side of it that would answer your question, and that's why we're trying to get the answer

to you as a transcript response so the department can give you the answer you want.

MR. HAVER: I have questions about the new meter system. Would those be appropriate for this panel?

MR. DASENT: The new meter system is actually addressed also by Steve Junod and the Operations Panel.

MR. HAVER: Let me make additional transcript requests.

HEARING OFFICER CHESTNUT: I don't think you have obligations to do a transcript request for this. You had every opportunity when those witnesses were available for cross-examination.

MR. HAVER: And I did ask those questions, and I was told that was not the correct panel. And you also, Your Honor, ruled that if I addressed it to a different panel, I can reach back and have those questions answered by a previous panel.

HEARING OFFICER CHESTNUT: If Mr. Dasent wants to supply it, he can, but again --

MR. DASENT: We have quite a few

already between now and next Wednesday, but let me put this on the list, Mr. Haver, because we want to answer your requests.

MR. HAVER: How much did the new meter system cost, how much is it projected to save each year, and what is the -- how long will each new meter last for? What's the projected life of a new meter?

MR. DASENT: Thank you. We'll get that.

MR. HAVER: Do you work with PGW to enroll households in TAP?

MS. CROSBY: We do not.

MR. HAVER: Is there a reason why you don't?

MS. CROSBY: I believe we answered that in a discovery request, so I'm not going to give you the most precise words, but I believe it's because they are a -- they're regulated by the Public Utility Commission, and we would have to work with their office, their company, to make sure that any type of information exchange does not run afoul of those regulations.

And since we are not governed by the

PUC, I myself am not aware of what, if any, or to the extent those limitations may be.

MR. HAVER: Thank you.

Drawing your attention to your testimony, page 5, line 13 through 14, I was unaware --

HEARING OFFICER CHESTNUT: Excuse me, was that direct or rebuttal testimony?

MR. HAVER: Direct. I was unaware we'd be able to do screen save, so I do not have the ability to call it up for you. I just have to give you the page numbers and lines.

MS. CROSBY: So I do have my direct. Can you give me the page again?

MR. HAVER: Page 5. Again, this is the numbered page, not on my computer, but the numbered page from your testimony. Page 5, line 13 to 14.

MS. CROSBY: So my direct statement, line 13 is blank and line 14 is "wrap." Is that what you're referring to?

MR. HAVER: I'm referring to your quote: Approximately 41% of consumers use the e-billing format.

MS. CROSBY: Are we looking at PWD Statement 5?

MR. HAVER: I'm looking at your statement, the Water Revenue Bureau.

MS. CROSBY: I'm looking at PWD Statement 5, page 5 of 15. Line 13 is blank and line 14 says wrap, W-R-A-P, and it's underlined.

MR. BALLENGER: I believe I can solve this mystery. If you look at page 3 of your testimony, starting on line 13.

MS. CROSBY: Pay their water bill as of the end of November 22nd -- or 2022? Is that it, Mr. Haver?

MR. HAVER: Again, if that's the page that you have it on. The line I'm interested in is: Approximately 41% of consumers use the e-billing format.

MR. DASENT: That's it.

MS. CROSBY: Yes, I see that.

MR. HAVER: Okay. What does that actually mean? Does that mean they go to the City's web page and pay that way?

MS. CROSBY: It means that they either have an account to receive their bill

via paper or they have an account to make their payments or -- it does not count the one-time payment. So, yes, it's those two things. They have an account to make payments on a regular basis and view their bill, or they have an account to receive paper billing but do not make their payments. So it's those two types of accounts.

MR. HAVER: What percentage of PWD customers pay through the City's web page?

MS. CROSBY: I don't have that number available right now.

MR. HAVER: Okay. The web page says that the system is powered by KUBRA EZ-PAY. What does that mean?

MS. CROSBY: KUBRA is our vendor that handles that web -- the website and accepting the payments that are made through that website. They're a payment vendor.

MR. HAVER: Does KUBRA have any offices in the United States?

MS. CROSBY: I don't know.

MR. HAVER: Do you know where their corporate office is located?

MS. CROSBY: I do not.

MR. HAVER: Do they have any offices in Philadelphia?

MS. CROSBY: I do not know.

MR. HAVER: Do they employ any Philadelphia residents?

MS. CROSBY: I do not know.

MR. HAVER: How was KUBRA EZ-PAY selected?

MS. CROSBY: Through an RFP process.

MR. HAVER: Does KUBRA pay the City of Philadelphia for being a vendor or does the City -- I'm sorry, does the Water Revenue Bureau or the Water Department pay KUBRA for being a vendor or does KUBRA pay the Water Revenue Bureau or the Water Department for being -- for doing the service?

MS. CROSBY: I don't know the details of the contract.

MR. HAVER: Who would?

MR. DASENT: We could get a copy of the contract through the law department.

MR. HAVER: That would be fine, but it's a much simpler question. Does the Water Department pay them, does the Water Revenue Department pay them, or do they pay the Water

Revenue Department or the PWD for the privilege of collecting the funds?

MS. CROSBY: I don't know, but I believe that would be laid out in the contract.

MR. DASENT: Yes.

MR. HAVER: Okay. Please get me a copy of the contract.

Is there a surcharge for using the City's web page to pay a water bill?

MS. CROSBY: In some instances, yes.

MR. HAVER: What is that surcharge?

MS. CROSBY: I do not know off the top of my head. I believe we did provide it in a discovery response.

MR. HAVER: Who would know that off the top of their head?

MR. DASENT: If anyone on the panel knows, that's fine. Otherwise, the discovery response will speak to that issue. It's posted at the Rate Board website.

We don't have that information in the room, Mr. Haver, I'm sorry.

MR. HAVER: Thank you.

How is the fee set? Does WRB or PWD

set the fee or is that something that KUBRA EZ-PAY sets?

MS. CROSBY: I believe that would also be in the contract.

MR. DASENT: Yep.

MR. HAVER: But you don't know?

MS. CROSBY: No. As I said, I do not manage that contract.

MR. HAVER: Thank you.

How much does it cost WRB and/or PWD to process a payment that reaches it through the United States mail?

MS. CROSBY: I do not know.

MR. HAVER: Who would know that?

MR. DASENT: That's something that could be researched, Mr. Haver, but I think we're talking now outside the scope of Ms. Crosby's testimony. And as much as I'd like to answer all of your requests, between now and Wednesday we have a full plate, not to mention briefing as well.

So I don't know that this is the panel to answer that question, and we'll gently lodge an objection.

HEARING OFFICER CHESTNUT: I don't

know how to respond to that in terms of a gentle objection.

MR. DASENT: How about a vigorous one, then, because I can't answer that based upon the panel. So we object to this question for this panel.

HEARING OFFICER CHESTNUT: What exactly was your question?

MR. HAVER: How much does it cost the Water Revenue Bureau and/or the PWD to process a payment that comes in through the United States mail?

HEARING OFFICER CHESTNUT: If you can find an answer to it, but it does seem kind of a hard question to answer, to break it out like that. I'm sure there's some kind of overall number that's used as an operation expense. But I'm not sure you can do it by individual mailing.

MR. DASENT: If I can find the answer, I will do -- I will try to do so.

HEARING OFFICER CHESTNUT: Yeah, I don't know who could do that.

MR. HAVER: It would be incredibly important to decide how much it costs to

process bills paid through the mail and compare it to who is paying online to decide what's the most cost-efficient way to bill and collect. I don't know why that wouldn't be material to a discussion of a rate case.

MR. DASENT: It may be material to a discussion. I'm trying to figure out if there's a report that addresses that, and my suspicion is, and a clear suspicion, that it's cheaper to do it electronically. But I'd like to give you some good information on that point, and if there is a report, we will provide it.

HEARING OFFICER CHESTNUT: And the problem is that this is really late in the proceeding.

If you can do it, fine.

MR. DASENT: Okay.

HEARING OFFICER CHESTNUT: And I would think you could do it by reference to the filing in terms of what operational account handles this, which I wouldn't even begin to know --

MS. CROSBY: The --

HEARING OFFICER CHESTNUT: -- how to

do.

MS. CROSBY: -- payment processing in the mail room is not under PWD's operations.

HEARING OFFICER CHESTNUT: Oh, okay. Well, who does that? The City?

MS. CROSBY: Yes.

HEARING OFFICER CHESTNUT: Well, there's your answer.

MS. CROSBY: PWD doesn't have its own mail room. I guess that's the best way of saying it.

MR. HAVER: Does the City bill PWD or WRB for processing the payments?

MS. CROSBY: No.

MR. HAVER: So the City absorbs the cost of processing the payments?

MS. CROSBY: I don't know what you mean by absorbed, but there are staff who work there so there's labor costs, there's machinery. So I'm assuming there's purchasing or rental cost.

MR. HAVER: And that's paid for out of the City's general operating budget, is what I'm asking; is that correct?

MS. CROSBY: I don't know.

MR. HAVER: Does -- again, does Water Revenue Bureau make a payment to the City for those services?

MS. CROSBY: No.

MR. HAVER: Does the Philadelphia --

MS. CROSBY: There's no interfund transfer for that.

MR. HAVER: Does the Philadelphia Water Department make a payment to the City for those services?

MR. DASENT: That would be for finance to address, but -- I'm sorry, Susan, if you know. I'm sorry.

MS. CROSBY: There's no inter fund transfer for that.

MR. HAVER: Thank you.

Are there other ways consumers can pay the bill other than through the mail or from the web page?

MS. CROSBY: Yes.

MR. HAVER: And could you just list them quickly?

MS. CROSBY: They can come into our office. We have the main office in the municipal services building and we have a

satellite office in -- I don't know the exact address, but we do have one of our satellite offices open that has cashiering available.

MR. HAVER: Can I pay my water bill at a PGW office?

MS. CROSBY: No.

MR. HAVER: Are there check -- what are colloquially called check cashing places where I can pay my water bill?

MS. CROSBY: To the best of my knowledge, no.

MR. HAVER: Are there any retail outlets where I can pay my water bill?

MS. CROSBY: No.

MR. HAVER: So the check cashing places that say you can pay your utility bill here are not referencing Philadelphia Water Department bills?

MS. CROSBY: I don't know what their information states.

MR. HAVER: Okay. You spoke earlier and you said you weren't sure what the size of the surcharge was for paying online, but that you knew there was a surcharge; is that correct?

MS. CROSBY: Yes.

MR. HAVER: Do you believe that that's a disincentive for people to pay online?

MS. CROSBY: I can't say one way or another what incentivizes or deincentivizes people to choose a certain payment method.

MR. HAVER: Okay. I have questions about the amount of the charge, the surcharge. I'm going to skip them all. I know you have to get on a plane and you've already said you don't know it. I'm going to take you at your word that you don't know it, so I won't go through those.

Please give me a moment to cross those off my list and get to the ones that you may be able to answer.

I wanted to revisit the different numbers of how many households are eligible for TAP. Public Advocate's consultants said there are 170,000 TAP eligible. I believe you just said the number is 56,000.

Can you explain the wide difference of opinion in those numbers?

MS. CROSBY: I believe that the

56,000 was an estimate made by Raftelis in an earlier rate case, and that the -- I'm -- I've read it several times, and I'm still not quite clear on Mr. Colton's methodology for his number, but there is a difference in those numbers.

MR. HAVER: Could someone from Raftelis explain to me why there's such a wide -- it's not just a small divergence; it's a very large divergence. Can someone from Raftelis help me understand why there's such a divergent view of how many households are eligible?

MR. DASENT: I'm not sure if John can answer that. I have a feeling he can.

MR. PILKINGTON DAVIS: At the outset of the discussion of setting up the TAP program in the 2016 rate proceeding, we did an analysis. We looked at income levels that, of course, from the Census Bureau looks at households, the number of households at certain income levels. There are about 646,000 households in the city of Philadelphia.

As we know, households do not equate

to customers of the Philadelphia Water Department. There are only about 430ish thousand customers of the residential class in Philadelphia with the Water Department. So you have to do a crosswalk.

Certainly, low-income customers are less -- or low-income households are less likely to be direct customers of the system. So that's the process that we went through coming up with 56,000 customers as an estimate. That's the number that has been used by the City from the outset of 2016, and we stand by that number.

MR. HAVER: So fair to say you disagree with the Public Advocate's testimony; is that correct?

MR. PILKINGTON DAVIS: Correct.

MR. HAVER: Thank you.

I want to then ask about the number of households currently enrolled in the TAP program. I did try and look at all of the charts in your testimony, and I could not find that -- a breakout just to the people enrolled in the TAP program, not the senior citizen program, not the legacy program, but just TAP.

Do you have a number of how many households are enrolled just in TAP?

MS. CROSBY: To the best of my knowledge, at the beginning of May, there were approximately 26,000. And that's subject to check.

MR. HAVER: So based on your testimony, you would have more than 50% -- I'm sorry, just slightly less than 50% of the eligible households enrolled in TAP; is that correct?

Mr. Davis, I'll ask you to do the math. You can do it faster than I can. 26 out of 56?

MR. PILKINGTON DAVIS: I'll refer to my calculator here.

MR. HAVER: Okay.

Well, 25 out of --

MR. PILKINGTON DAVIS: 46%.

MR. HAVER: 46%. Public Advocate witness estimated 9%. Could you help me understand the divergence again?

MR. PILKINGTON DAVIS: We're using a denominator of 56,000. Public Advocate's expert is using a denominator of 170,000.

MR. HAVER: Thank you.

And even the number of people enrolled in the TAP program, Public Advocates -- the Water Department's Public Advocate says that number is 15,032. You say that number is 26,000.

Can you help me explain the divergence there as well?

MS. CROSBY: I believe he may have been looking at previously published reports. I'm referring to a monthly report that I receive internally.

MR. HAVER: Could -- as a transcript request, could I see that report? The most recent monthly report that you're referencing?

MS. CROSBY: Sure.

MR. HAVER: Thank you.

MS. CROSBY: I'm answering on behalf of you, Andre.

MR. DASENT: That's fine. I just want to make sure that Ms. Crosby could provide it.

MS. CROSBY: Yes, I can provide it.

MR. DASENT: Okay.

MR. HAVER: I want to revisit LIHWAP.

And I know the initials are L-I-H-W-A-P. And Mr. Colton suggested I was pronouncing it incorrectly. But I think you're familiar with the program; is that correct?

MS. CROSBY: That is correct.

MR. HAVER: I'm referencing page 9, line 1. And again, that's on my computer; it may not paginate the same as your computer.

HEARING OFFICER CHESTNUT: Page 9 of direct or rebuttal?

MR. HAVER: Direct testimony of the Water Revenue Bureau.

HEARING OFFICER CHESTNUT: Okay.

MR. HAVER: But I've already discovered that my computer pagination might be different than yours.

MS. CROSBY: Can you give me the first sentences or --

MR. HAVER: Sure. It states that: As of November 30th, 2022, 3,560 households received LIHWAP grants. Over the life of the program, Philadelphia water consumers have received a total of $13,494,421.

MS. CROSBY: Yes, I see where you're looking. Yes.

For everyone else, it's page 9 of 15. It starts on page 8 of 15 and goes to page 9 of 15.

MR. HAVER: You write: Over the life of the program, Philadelphia water customers have received a total of 13 million.

How many customers is that?

MS. CROSBY: I believe it's approximately 7,000. I think that if you add up the numbers from the prior sentences you can get to the actual number. But I don't have a calculator. It's --

MR. HAVER: Again, subject to check. 7,000 is fine. Again, I know you want to get to your plane. I'm sure you want to get home, so I don't want to take the time to do the actual math. I can do that without you.

MS. CROSBY: It's a little over 7,000.

MR. HAVER: Right. And I will calculate the -- I'm not going to ask you to calculate the average size of the grant now. I'll do that on my own.

But I would be right to divide that number into the 3,560 households that received

the grant to find out what the average grant size was; is that correct?

MS. CROSBY: Yes, that is how you could calculate averages.

MR. HAVER: Okay. How many people were -- how many households were eligible for the LIHWAP grant in Philadelphia?

MS. CROSBY: I do not know.

MR. HAVER: So you wouldn't know what percentage of people who were eligible received it?

MS. CROSBY: Correct.

MR. HAVER: And the total amount that one could qualify for as a grant was how much?

MS. CROSBY: It was 5,000. They're -- it's 2500 for water service and 2500 for sewer service, so for our customers it was 5,000.

MR. HAVER: And is that program still open?

MS. CROSBY: I believe the money has been expended. There is discussions about additional funding, but I've not heard any final decisions.

MR. HAVER: Was WRB accepting

applications for LIHWAP?

MS. CROSBY: No. The LIHWAP program was administered by the State.

MR. HAVER: Where did someone have to go to apply for LIHWAP?

MS. CROSBY: I believe they could do it online or through a local benefits office. But again, that was the State's program, so I don't know the specifics.

MR. HAVER: Did the places where WRB accepts payments for the water bill also help people go online to apply for the LIHWAP grant?

MS. CROSBY: Again, we did not administer the program. We received our payments directly from the Commonwealth.

MR. HAVER: I understand that, but I'm asking, if I, as a consumer, went in to pay my bill at one of your offices, would your staff help me apply for the LIHWAP grant online if I did not have a computer at home or I had some issues around computer literacy or I simply couldn't pay for my internet bill?

MS. CROSBY: Oh, I see. No, we did not have any facilitation for that.

MR. HAVER: Thank you.

In retrospect, was that a mistake?

MR. DASENT: Objection. This is sort of past -- the program is closed right now. It might be extended, but whatever happened in the past, we've factually described it to you. However, to characterize it now, I'm not sure how that helps anything. We've done our outreach, we've done a number of steps to make it known that this program was available, and it was well subscribed. And we would like it to be fully subscribed because it's to our benefit.

I think that question, you know, just -- it has nothing to do with a prospective ratemaking, which is what we're about. Fiscal '24 and '25. Not what happened last year or the year before.

Please note our objection.

HEARING OFFICER CHESTNUT: Yeah, I don't really see why going back to a program that wasn't even a PWD program, PWD did not administer it. In terms of mistake, I guess that's just a general term. Maybe, did you learn from it and have incorporated those

lessons? But I -- I really don't see that as answerable.

MR. HAVER: I was asking her opinion.

HEARING OFFICER CHESTNUT: I'll let Mrs. Crosby take a crack at it, but I really kind of am doubtful about it.

I just think there are a lot of factors. You can't just -- you know, that would have to be looked at to get an answer that really is helpful.

MR. DASENT: Ms. Crosby, can you add anything?

MS. CROSBY: Just generally, from every program that we administer, that others administer, there's always lessons learned. We learn lessons from other utilities. So anytime we can learn something from the success of a program, we try to -- we use that in developing our processes and procedures.

MR. HAVER: Again, I'd like to continue to visit that issue. I will not, understanding you have to leave within half an hour. I will do my best to address it with -- in a different fashion.

Will the other members of the panel

be available to try and answer some of these after Ms. Crosby has to leave?

MR. DASENT: Yes, they can be.

MR. HAVER: Thank you.

Again, on my copy of your direct testimony, page 12, lines 7 through 11.

MS. CROSBY: Would you start --

MR. HAVER: Yes, ma'am. The above changes between participation levels reflect the shifting landscape brought about by the pandemic and the City's subsequent return to the use of shutoffs for unpaid bills in July 2022. As the Water Revenue Bureau has now resumed most collection activities, the increase in payment agreements in FY 2023 is significant.

HEARING OFFICER CHESTNUT: That's page 12 of your statement.

MS. CROSBY: Thank you.

MR. DASENT: Right above Roman IV.

MS. CROSBY: Yes, I see that.

MR. HAVER: What was the Water Revenue Bureau's collection rate in fiscal year 2021 and fiscal year 2022 when the pandemic was upon the city?

MR. DASENT: Please note that Black & Veatch speaks to this issue, the collection rate? Which is over a three-year period, and Ms. Crosby speaks to collections as in getting the revenues actually in the door, hiring agencies to assist when necessary to get revenues in the door, and running the assistance program.

I'm not sure that she speaks to the actual collection rate, but, Ms. Crosby, if you want to take a stab at it, please do, but Black & Veatch really speaks to this.

MS. CROSBY: Right. So --

HEARING OFFICER CHESTNUT: There's no reason for Ms. Crosby to do it if there's a panel member -- I mean, this is an integrated panel. So whoever is best able to answer Mr. Haver's question should answer it.

MR. DASENT: Yeah.

MS. CROSBY: So when we at Revenue talk about collection rates, we talk about dollars in the door versus billings. And I believe that that's a very different methodology than what Raftelis uses.

MR. HAVER: So I'm a little confused.

What would you then say is your collection rate, what percentage do you say it is, dollars in the door?

MR. DASENT: Perhaps Raftelis should best speak to that. I don't know if Jen or Henrietta or John.

MS. CROSBY: I can tell you that the numbers that are reported in the rate case are separate and apart from the numbers that we in the department of revenue use for our reporting, because they're two completely different reporting systems. Ours are for budgetary purposes, and theirs are for ratemaking purposes. So it's apples to oranges.

MR. HAVER: Right. So I'm asking what number -- what the collection percentage that -- rate is that you use.

MS. CROSBY: Okay. So I don't have -- I don't have those revenue information with me, but it has been published in the department of revenue's five-year plan, which is available on the department of revenue's website. So I would direct you to that information.

MR. HAVER: I'm sorry, the -- you said the revenue department's five-year plan? I'm assuming that's incorporated in the City's five-year plan; is that what you're referencing?

MS. CROSBY: Yes.

MR. HAVER: Or does the revenue department have a separate five-year plan?

MS. CROSBY: We have a separate one, and it's on our website under reports.

MR. HAVER: Again, I appreciate your help and your indulgence. So the City has a five-year plan. That's not what you're referencing. You're referencing a separate five-year plan that's used for the revenue department; is that correct?

MS. CROSBY: Correct.

MR. HAVER: And that is not on -- that's on the City's web page, but not under the City's five-year plan. One has to go to the revenue department to find the revenue department's five-year plan; is that correct?

MS. CROSBY: Yes.

MR. HAVER: Okay. Can one of the consultants tell me what the percentage of --

what the collection percentage rate is that's used by the Water Revenue Bureau?

MR. DASENT: Reports that are prepared by ROC, you know, are used in the rate case. So I think that's the -- sort of the focus for ROC reporting, but correct me if I'm wrong, Jen, or Henrietta.

MS. LOCKLEAR: That's correct.

MR. HAVER: That doesn't answer my question.

MR. DASENT: But it tells you, when you get your response, it will be the rate -- the collection rates that we use in the rate case as opposed to WRB.

MR. HAVER: I'm asking specifically about WRB. I want to investigate the power of terminations to increase collection rates. That's the point of the questions. I'm not asking about anything else right now. Simply asking about what does WRB -- what does -- how does WRB list its collection rate.

MS. CROSBY: Right. RFC would not have any of -- does not have the information that we use to do that. We can -- you can access that information through the reporting

and if you -- we can make it a transcript request. I'm adding to Andre's work. And we can get that for you.

MR. HAVER: Okay. Again, the reason for these questions is I want to ask the follow-up question, but I don't believe, based on what you've told me, you'll be able to answer, but I will put it on the record anyway.

You go on to say, in your testimony, at the -- towards the end of lines 7 to 11, that you've now started cutting people's service off, termination, shutoffs, whatever the language you use is. I believe you use the actual term "shutoffs" for unpaid bills.

And I'm asking now that you have started that process again, has that increased your collection rate in the way that you measure collection rates?

MS. CROSBY: I see.

You're correct, we would need the prior one.

MR. HAVER: I'm sure you are aware that the other -- you -- the other Water Department -- excuse me. It's not other

because the Water Department is separate from water revenue. I'm sure you are aware that the Water Department's consultants have gone on record saying that it has not changed, whether there were terminations or not terminations. You're aware of that, right?

MS. CROSBY: Was that on prior testimony during these hearings?

MR. HAVER: Yes.

MS. CROSBY: I've been at a conference this week, so I've not seen any of these hearings.

I can tell you, we cannot provide you the collection rate that you're asking for about shutoffs, because we began shutoffs, service disconnections in July of 2022. That fiscal year has not closed. That fiscal year closes in the end of June, so we wouldn't be able to tell you how it has impacted the collections.

MR. HAVER: Right. I was -- I must admit I was surprised to see that there's no difference in collection rates whether people are facing shutoffs or not facing shutoffs. It didn't make intuitive sense to me. It was

not part of my experience in listening to people. So that's why I'm trying to investigate this. But if it doesn't matter, in terms of collection rates, whether someone faces a shutoff or not, I now want to explore the cost of shutting somebody off.

How much does it cost to turn -- to shut off somebody's water?

MR. DASENT: This is beyond the scope of Ms. Crosby's testimony. PWD actually carries out the shutoffs. Mr. Junod could have spoken to that yesterday. You did not raise the question.

HEARING OFFICER CHESTNUT: Can anybody answer that? I mean, it really isn't within the scope of your testimony, but is that a factor you would look at?

MR. PILKINGTON DAVIS: We don't have that information.

MR. HAVER: So in the Water Revenue Bureau's designing of collection tools, it doesn't factor in the cost of terminating or shutting off somebody's water?

MR. DASENT: That's the Water Department's job, and they do consider very

much how much it costs to dispatch the worker to carry out the disconnection, to reconnect certain persons if you need to reconnect them after a shutoff. And so that's very much in the Water Department's thinking, not necessarily translating to what Ms. Crosby does.

MR. HAVER: Well, again, my understanding is the Water Revenue Bureau develops the tools for collection. So let me make sure that's a correct assumption.

HEARING OFFICER CHESTNUT: And I don't know what you mean by develops.

MR. HAVER: The Water Revenue Bureau is in charge --

HEARING OFFICER CHESTNUT: That's not the case.

MR. HAVER: So going back --

HEARING OFFICER CHESTNUT: I can --

MR. HAVER: Going back to page 12, lines 7 through 11. As the Water Revenue Bureau has now resumed most collection activities, are those collection activities designed by the Water Revenue Bureau?

MS. CROSBY: Some of them are, yes.

MR. HAVER: All right. And I'm asking how do you know what are cost-efficient tools if you don't know the cost of terminating -- of shutoffs and turning someone back on?

MS. CROSBY: When we look at the tools, we look at the method and the timing of the collection tool. And so that is how we determine the cost. The dollar value of sending out a truck is borne and -- I don't want to say borne. It is part of the cost of service from PWD, so when we look at collection tools in deciding what tool to use, that's things like letters, using collection agencies, using a sequestration program, using disconnections, doing outbound calling, those types of things.

MR. HAVER: So not the cost of shutoff and turn-ons?

MS. CROSBY: Not the hard costs, no.

MR. HAVER: Thank you. Okay.

You raised -- you spoke about collection agencies, and that was my next question. Does Water Revenue Bureau use collection agencies to collect for bills?

MS. CROSBY: Yes.

MR. HAVER: Does Water Revenue Bureau sell the bills to the collection agencies?

MS. CROSBY: No.

MR. HAVER: Does Water Revenue Bureau pay -- assign a portion of the bill to the collection agency?

MS. CROSBY: I don't understand the question.

MR. HAVER: Okay. So I'm assuming, again, and let me make sure it's a correct, assumption. I'm assuming the collection agencies don't work for free.

MS. CROSBY: That is correct.

MR. HAVER: Is that a correct assumption?

MS. CROSBY: It is.

MR. HAVER: And you have said that the Water Revenue Bureau does not sell the bill.

MS. CROSBY: Correct.

MR. HAVER: The collectible to the debt collection company; is that correct?

MS. CROSBY: Right.

MR. HAVER: So I'm now inquiring how

the debt collection company is paid.

MS. CROSBY: They get paid a percentage of their collections.

MR. HAVER: And what is that percentage?

MS. CROSBY: It varies depending on the type of delinquency that is referred to them and how the customer pays. Or not how. Who the customer pays.

MR. HAVER: Could you elaborate? Because I don't understand those parameters.

MS. CROSBY: So we call them nondirect and direct payments. So if a customer pays a collection agency directly, they receive 1%. If they pay the City directly, there's a different percentage.

MR. HAVER: And what's that percentage?

MS. CROSBY: I don't have those contracts. I don't manage those contracts. They're managed by the department of revenue, and not my side. It's managed by the collection side of the tax, the tax side.

MR. HAVER: What percentage of your collectibles are placed with a collection

agency?

MS. CROSBY: It varies from year to year, and it's varied greatly during the pandemic, because it also coincided with the new regulations for the Fair Debt Collection Act.

So for an extended period of time, we did not send any accounts to our collection agencies as they and we came into compliance with those regulations. So it's -- it varies wildly.

MR. HAVER: Okay. Do you have a projection for how many accounts will be sent to a collection agency in the coming fiscal year?

MS. CROSBY: I do not. I do know that we are changing the way that we use collection agencies as a tool, and so I do know -- I said it varies wildly. It will change when we institute those new parameters.

MR. HAVER: And what are those changes?

MS. CROSBY: So currently accounts only go to our collection agencies after they've had their service disconnected. We

are now doing a flip-flop so that the delinquent accounts will go to the collection agencies first, and if they remain delinquent, they will -- if they meet the eligibility requirement, then they will move towards a service disconnection.

MR. HAVER: How many debt collection agencies does WRB use?

MS. CROSBY: Three.

MR. HAVER: What are their names, please?

MS. CROSBY: To the best of my knowledge, it's AllianceOne, Harris & Harris, and the Revenue Collection Bureau.

MR. HAVER: Starting with the first, where are their corporate offices located?

MS. CROSBY: I don't know where any of them are located, with the exception of the Revenue Collection Bureau, and they are located in Philadelphia.

MR. HAVER: 33%. Okay.

MS. CROSBY: I said I don't know the others.

MR. HAVER: You don't know where the others are. Okay.

MS. CROSBY: Correct.

MR. HAVER: They may be in the city, they may not, you just don't know?

MS. CROSBY: Correct.

MR. HAVER: Thank you.

With those parameters changing and the strategies changing, and I'm believing that you're doing that to improve collection rates, I'm not sure on what basis you make revenue projections going forward if you don't know how successful or unsuccessful these changes will be.

Can you help me understand your working assumptions for the future using a new type of collection tool?

MS. CROSBY: So we're actually changing the way we do -- you -- when we use our outside collection agencies in order to hopefully limit the number of people who are disconnected.

So it is not for reasons of collections per se; it's to increase the amount of people -- or rather to decrease the amount of people who are eligible for service disconnection. Because we know that our

collection agencies do make collections, and we think that they are better suited to be placed before shutoffs. So that was the driver in that decision. It was a policy decision and not a financial decision.

MR. HAVER: So you're not making any assumptions about increased collections by using the new strategies; is that correct?

MS. CROSBY: No. No. We're doing it in an effort to protect more Philadelphians for having their water disconnected.

MR. HAVER: In what -- why do you believe that a private debt collection service would be better at protecting residents from shutoffs than the City's own staff?

MS. CROSBY: Because right now, the way the debt progresses, it goes -- they have delinquencies, they have -- they don't pay their bill. They get a bill notice saying that they're delinquent. And then they move into a pool of shutoff-eligible customers.

So there are little to no collection efforts made prior to going to shutoff. And that is -- we've now come to see that that is not the best and appropriate way to use our

collection tools, so we're changing it.

MR. HAVER: Thank you.

Moving forward. I have a bunch more questions. You have to leave at 10:30, correct?

MS. CROSBY: Actually, my hard stop is at 11:00.

MR. HAVER: Okay. Well, let me make sure that I take a minute to get through the things that are most important to me.

Page 12 of my copy, lines 18 to -- line 18 to 25, you talk about the sequestration program. And the quote is: Since the program's inception in March 2019, the City has collected over 15 million in water debt through this program.

MS. CROSBY: Yes.

MR. HAVER: What do you believe is the eligible amount that could be collected through that program?

MS. CROSBY: I don't know.

MR. HAVER: Thank you. Page 13, line 5 to 11. A different program. Since the program's inception in March 2019 -- seems -- by the way, parenthetically, it seems like

March 2019 was a very busy time for you -- the City has collected approximately $950,000 by the unified -- and I'm paraphrasing here -- by the unified efforts of LNI and WRB.

Do you see that?

MS. CROSBY: Yes.

MR. HAVER: Again, I'm asking about what you believe is the total amount available.

MS. CROSBY: I don't know.

MR. HAVER: Thank you.

For billing purposes, the new meters, is that -- are those appropriate questions to ask you about?

MS. CROSBY: It depends on what part of the billing you are asking about.

MR. HAVER: So my understanding is the new billing allows for hourly meter reads.

MS. CROSBY: That is outside of my purview. We receive the billing information on a monthly basis for billing purposes.

MR. HAVER: Have you or your consultants looked at the possibility of time-of-day metering for water?

MS. CROSBY: For time-of-day

metering?

MR. HAVER: Right. So some electric utilities try and level the load by offering discounts if you use your electricity in the evening, during nonpeak times.

MS. CROSBY: I understand the question, and I'll refer to the Raftelis panel.

MR. DASENT: Well, I think in the abstract, certainly they can address that, but in the more -- most concrete terms, we did address this with the Operations Panel, and they indicated that there were, you know -- there are metering changes in the works. And it's also been addressed by even the Public Advocate's witness.

HEARING OFFICER CHESTNUT: Let's see if they can answer it. I'm not sure -- I don't think it's within the scope of their testimony, but...

MR. DASENT: No, it didn't.

MS. TAVANTZIS: We have not been involved in those discussions.

HEARING OFFICER CHESTNUT: Okay.

MR. HAVER: That's all I was asking,

whether it was being discussed or not.

HEARING OFFICER CHESTNUT: Well, they didn't say whether it was being discussed. They said they have not been involved.

MR. HAVER: Right, but that's why I was asking the question of Ms. Crosby.

MS. CROSBY: I am not involved in those discussions, if they are or are not occurring.

MR. HAVER: Thank you.

Just follow up. I'm going to skip a number of questions so that you can leave to get home.

I'll follow up with the questions about management, operating, and revenue audits.

Are you familiar with those concepts, management, operating, or revenue audit?

MS. CROSBY: Managing, operating, or revenue audit?

MR. HAVER: The management, operating, or revenue audit.

MR. DASENT: Well, certainly management audit we've heard of.

MS. CROSBY: Right.

MR. HAVER: I wasn't asking you, Mr. Dasent.

MR. DASENT: I know, but I know where this goes, and Raftelis was involved, so it was a management audit. We talked about this before.

MS. CROSBY: So, Mr. Haver, if you're speaking of the management audit that was done in the past, I am aware of that, yes.

MR. HAVER: I'm asking you in general, and now I'll ask specifically. You're familiar with the management audit. Are you familiar with an operating audit?

MS. CROSBY: Yes, I know that those things occur, yes.

MR. HAVER: Are you familiar with a revenue audit?

MS. CROSBY: Sure, yes.

MR. HAVER: Thank you.

My understanding is that WRB has undergone a management audit; is that correct?

MS. CROSBY: Yes.

MR. HAVER: What year was that performed?

MS. CROSBY: I don't know. That was

before I came into this position.

MR. HAVER: When did you come into that position?

MS. CROSBY: I believe it was November. It was November of 2020.

MR. HAVER: Have you reviewed the management audit that was done?

MS. CROSBY: I --

MR. DASENT: If you recall.

MS. CROSBY: I don't recall. I don't recall.

MR. HAVER: Thank you.

My understanding is that WRB hires consultants from time to time; is that correct?

MS. CROSBY: Generally, yes.

MR. HAVER: And that you have retained consultants to help support the requested rate increase; is that correct?

MS. CROSBY: WRB does not contract with any consultants in regards to the rate case.

MR. HAVER: So then how do you end up with the two women and the gentleman who are with you today?

MS. CROSBY: Their contracts are -- they are retained and their contracts are managed by the Philadelphia Water Department.

MR. HAVER: But you're not part of the Water Department; is that correct?

MS. CROSBY: That is correct, I am part of the department of revenue.

MR. HAVER: So then how does that work? They -- your consultants don't work for you, they work for somebody else? Is that correct?

MS. CROSBY: They're not my consultants.

MR. HAVER: Ah, I see. Okay. So then I'll just ask you specifically.

You have said that you have hired consultants in the past. Did I understand that correctly?

MS. CROSBY: Yes.

MR. HAVER: What was the purpose for hiring those consultants?

MS. CROSBY: Let me preface that. I know that the department of revenue has hired consultants in the past. To the best of my knowledge, the department of revenue Water

Revenue Bureau has hired consultants in the past. In my current role while I've been serving it, I have not retained -- we have not retained any consultants.

MR. HAVER: Thank you very much. I'll let you get on the plane. I don't want to belabor the point.

HEARING OFFICER CHESTNUT: Does that mean you're done with your cross-examination?

MR. HAVER: Yes.

HEARING OFFICER CHESTNUT: Okay. Thank you, Ms. Crosby. We appreciate your involvement here. You're excused.

Mr. Haver, do you have additional questions for the other panel?

MR. HAVER: Well, I was working under the assumption that the panel worked for the Water Revenue Bureau. Hearing that it does not, I don't think it would be helpful to continue to ask them the questions. Understanding now that they don't work for the Water Revenue Bureau and the Water Revenue Bureau retained no consultants for this rate case, I don't want to waste anybody's time.

HEARING OFFICER CHESTNUT: Okay. But

if you don't have any questions about their testimony, I'm not sure it matters who they are retained by. The fact that they presented testimony -- if you have questions about it, I think you should ask them.

MR. HAVER: Okay. So, again, now I'm unclear what the panel's expertise is.

MR. DASENT: They're retained for reporting and their services are -- their engagement, they can certainly speak to, but I see reporting related to collections, I see reporting related to the TAP program, I see reporting related to other parts of -- support for the rate filing. And they can talk about that in detail.

MR. HAVER: Okay. Let's start with collections, then.

Your Honor, do you want to excuse Ms. Crosby so she doesn't --

HEARING OFFICER CHESTNUT: I thought I had done that. But if she wants to stick around, she certainly can.

MR. DASENT: We may have some questions on redirect for Ms. Crosby.

HEARING OFFICER CHESTNUT: Why don't

we take a short break and we can deal with Ms. Crosby and see about that. Okay?

MS. CROSBY: I don't know what I'm doing with my reactions. I was trying to raise my hand. I'm sorry.

MR. DASENT: But we may have an opportunity for redirect if we take a brief recess.

HEARING OFFICER CHESTNUT: Why don't we take a five-minute break and see if there's redirect for Ms. Crosby, and if not, you're certainly excused.

MR. DASENT: And if you can join us in a meeting in Teams, Ms. Crosby. Just want to make sure you are aware.

HEARING OFFICER CHESTNUT: Okay. We'll resume at 10:35.

(Recess taken, 10:29 a.m. to 10:37 a.m. EDT)

HEARING OFFICER CHESTNUT: Are we ready to resume?

MR. DASENT: Just brief questions on redirect.

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REDIRECT EXAMINATION BY MR. DASENT

MR. DASENT: On cross-examination, Ms. Crosby, the issue of the current number of TAP participants came up in Mr. Haver's questioning. Can you give us an update on the number of TAP participants as of right now?

MS. CROSBY: Yes. I used the break opportunity to pull up that report, and I was mistaken in the numbers that I provided. As of April 30th, 2023, the number of customers in approved or active status in TAP is 16,598. And I'll be able to provide that report as a transcript request.

MR. DASENT: Okay. Also there were questions by Mr. Haver concerning mail room costs. Who pays for these costs?

MS. CROSBY: The mail room is operated by the department of revenue, and the costs are borne by both the General Fund and the Water Fund. The staff, some of them are paid for by the General Fund, some are paid by the Water Fund, and the same is for the equipment used.

MR. DASENT: And also, part of Mr. Haver's cross, Joline referenced

100,000-plus households that were protected from shutoffs. And the makeup of that group is what I'd like you to follow up on. The 100,000-plus households, what's the composition of this group? I heard Medicaid, but are there more constituent groups?

MS. CROSBY: Right. So they are households who receive either Medicaid or homelessness prevention services from the City, and then the IDEA office also uses -- I think they call it an overlay of demographic data, and then they match that to our billing system.

And our billing system is extremely limited with naming conventions and whatnot. So if the IDEA team finds a name that is close to one that we have, we erred on the side of protecting that customer. So just a weird example, if someone's account name is Johnny Smith, but IDEA had them on their list as John Smith, we would protect our Johnny Smith customer to err on the side of caution.

MR. DASENT: Thank you, Susan. That's all we have.

HEARING OFFICER CHESTNUT: Ms. Price,

did you have any further cross based on the redirect?

MS. PRICE: No recross.

HEARING OFFICER CHESTNUT: Okay.

Mr. Haver?

MR. HAVER: No, I don't. Thank you.

HEARING OFFICER CHESTNUT: Okay. Thank you. Thank you very much, Ms. Crosby. You're excused.

MS. CROSBY: Again, thank you so much for everyone's flexibility.

MR. DASENT: Have a safe trip.

MS. CROSBY: Thank you.

HEARING OFFICER CHESTNUT: Now, are there further questions for the panel, for the Raftelis panel?

MR. HAVER: Well, I'd like -- I have additional questions, and I'd also like the record to reflect that there are people from Black & Veatch who are participating today, and request that if they are the appropriate persons or -- person or persons to answer these questions that the lawyer for the Water Department direct them to do so.

HEARING OFFICER CHESTNUT: Is that

okay with you, Mr. Dasent? Because it's okay with me.

MR. DASENT: I'm just listening for the questions. I mean, we've had an opportunity for cross-examination for all the witnesses. And I thought today was for Susan and RFC.

But we'll listen for the question, and if something is not onerous for them to sort of deal with today -- it's just not something we prepared for, truthfully.

HEARING OFFICER CHESTNUT: Okay. But if they can answer a question, then that will be fine.

MR. DASENT: Okay.

RECROSS-EXAMINATION BY MR. HAVER.

MR. HAVER: I want to revisit KUBRA EZ-PAY. Does anyone know where their corporate office is located?

MS. LOCKLEAR: I'm sorry, Mr. Haver, we don't, the Raftelis panel.

MR. HAVER: Thank you.

Mr. Dasent, I'm waiting for you to ask your other consultants if they do.

MR. DASENT: We can provide that

information for you, but quite frankly, you could Google it. That's what I'm going to do if we do a transcript request. I'll find out where they are and respond.

Ms. Crosby was the best person to answer, and she indicated she did not know.

MR. HAVER: Right. There's a value in finding out what is not known as well as finding out what is known.

MR. DASENT: It is knowable, and we can get that information for you.

HEARING OFFICER CHESTNUT: Yeah, can we like move on? This is seriously ridiculous.

Google it and find out. She gave you the name of the companies. Mr. Dasent, Google it and give him an answer.

MR. DASENT: Okay.

MR. HAVER: Well, I will tell you, and find out if you're surprised, their corporate headquarters is not in the United States. The Philadelphia Water Department's contracting with a company that's outside of the United States, and I'm somewhat surprised that none of the consultants are

aware of that. Nor is the Water Revenue Department aware of that.

But I'll move on.

HEARING OFFICER CHESTNUT: Yeah, thank you.

MR. HAVER: Do any of the consultants who are currently participating know what the fee is that is charged if you pay online through the water -- through the City's web page?

MS. TAVANTZIS: We do not have that information.

MR. HAVER: Can any of the consultants explain to me why that isn't of paramount importance in designing the collection and billing tools?

MR. DASENT: That is not what Raftelis does. They do reporting for collections. They do reporting in terms of data collection for the TAP assistance program. They don't do all the other sort of building blocks for designing, you know, what collection activity is appropriate. That's the Water Department.

MR. HAVER: Well, I see Ms. Bui and

Mr. Jagt are participating, as is Mr. -- forgive me, Mr. Yangalay. I've forgotten how to pronounce your name. I see they're participating as well. So they can feel free to answer the question.

Do any of the Water Department employees, do any of the consultants know what the fee is charged?

MR. DASENT: There is a small fee. I pay my bill. I can research that in two seconds. I can provide that information for you.

HEARING OFFICER CHESTNUT: Give him a transcript request with an answer.

MR. DASENT: It's like 2.96. It's a very small number. But I understand, you're saying it may be an incentive not to pay using electronic means.

MR. HAVER: And I'm again asking why the Water Department, the Water Revenue Bureau and all the consultants don't look at that and decide whether that's an impediment or not.

MR. DASENT: The Water Department --

MR. HAVER: And my question is --

MR. DASENT: -- made a decision to

offer this to all customers so they had the convenience of paying electronically.

HEARING OFFICER CHESTNUT: Mr. Dasent, let's stop this now. If you have a question for the panel that's presented today, ask them.

MR. HAVER: I am.

HEARING OFFICER CHESTNUT: The panel that is presented today is RFC, which does the reporting of these programs. The information they gather and how they collate it and present it, that's what they're here for.

MR. HAVER: Your Honor has already said that if I'm addressing the wrong panel that the other panel can be called back. They're already on the Zoom.

HEARING OFFICER CHESTNUT: But they may not be prepared to answer. If they can answer you quickly, I said they could.

MR. HAVER: And I'm asking --

HEARING OFFICER CHESTNUT: But they're not prepared to answer your questions here. They didn't get recalled.

MR. HAVER: And again, I'm asking why isn't it of paramount importance in deciding

how to collect bills what the collection fees are? If they can't answer that, they can't answer that.

MR. DASENT: That's beyond the scope of the testimony of RFC for sure.

MR. HAVER: Mr. Jagt, Ms. Bui, even Ms. McCarty, you're all participating. I'm just asking, can anyone answer that question?

MR. DASENT: Ms. McCarty is a Rate Board member so she wouldn't appropriately answer.

HEARING OFFICER CHESTNUT: Well, let's not get too in the weeds here, Mr. Dasent. At this point, what is your question? What is the fee?

MR. HAVER: No. Is it important to know what the fee is in designing collection and bill-paying strategies?

HEARING OFFICER CHESTNUT: I'm not sure -- is there anybody who can answer that?

MR. DASENT: If someone in finance can speak to that issue, that's fine. We didn't come prepared to talk about the fees. It's like a two-dollar fee, which also, the online KUBRA charge is in a discovery

response. So that information is out there.

We are aware of it, you are aware of it if you reviewed the discovery response. And it was evaluated in terms of offering opportunities for folks to pay electronically if they didn't want to mail -- mail in their payment or if they didn't want to go down to MSB and pay there.

This isn't so difficult.

HEARING OFFICER CHESTNUT: I think the difficulty is finding the right person to answer that. But you've already responded with a discovery request. That should be sufficient.

MR. DASENT: Yeah, that's it.

MR. HAVER: I want to now inquire about other places to pay bills other than the WRB offices or online.

Who would be the correct person to --

HEARING OFFICER CHESTNUT: You've already asked -- didn't you already ask Ms. Crosby that?

MR. DASENT: Yeah. She is the one --

MR. HAVER: And I want to ask --

HEARING OFFICER CHESTNUT: It's been

asked and answered.

MR. HAVER: Well, I want to ask why other opportunities are not explored. And so I want to ask first about is there a correlation between ease of paying bills and collections. And I'm asking to try and save your time, who should I be addressing those questions to? If there's no one appropriate to ask those questions of, just tell me.

MR. DASENT: Ms. Crosby was your best bet on that issue.

MR. HAVER: So no one can explain to me why we don't use check cashing places or Rite Aids or Walmarts or Walgreens as bill -- as ways people can pay?

MR. DASENT: Ms. Crosby was the best person to ask that question.

HEARING OFFICER CHESTNUT: Why don't you put that in the form of a transcript request that Ms. Crosby could answer.

MR. HAVER: If we're going to include it that way, I would also ask why we don't use PGW offices as payment centers for WRB or water bills.

MR. DASENT: I believe that's already

addressed in discovery, but we'll certainly include that in the response.

MR. HAVER: I want to go back to revisit the issue of how much does it cost to do a shutoff and to turn somebody back on. You told me that it was inappropriate to ask Ms. Crosby that. I'm now addressing that to the other members of other panels, Mr. Jagt, Ms. Bui.

HEARING OFFICER CHESTNUT: Didn't you ask that with the Operations Panel?

MR. HAVER: And it was my recollection that when I started to ask those questions, I was told that that should be addressed to the Water Revenue Bureau Panel. And then when I said I didn't know which panel to address it to, Your Honor said if I'm asking the wrong panel, it would be -- we could call back the right people to answer those questions.

HEARING OFFICER CHESTNUT: Well, that may be something that Black & Veatch people could answer in terms of the rate case, isn't it?

MR. HAVER: That's fine. I don't

care who answers. I would just like an answer.

MR. DASENT: The Operations Panel is actually the best panel for that, and Steve Junod and the folks that were before you in the last day or so. If Mr. Jagt or somebody from Black & Veatch can help us, let us know.

I see Mr. Merritt. I see Mr. -- I believe Dave Jagt is on. And if you don't have an answer, just tell us that.

HEARING OFFICER CHESTNUT: Yeah.

MR. MERRITT: Can you repeat the question, please?

MR. HAVER: How much does it cost for each water shutoff?

MR. DASENT: We have fees for water shutoff costs, so that may be helpful to you. That's in the filing.

MR. HAVER: I'm not asking about -- I'm not asking about what PWD or WRB charges.

HEARING OFFICER CHESTNUT: Yeah, I just --

MR. MERRITT: The fees --

HEARING OFFICER CHESTNUT: Can you calculate the cost of a shutoff? I mean --

MR. MERRITT: The proposed miscellaneous fees in this proceeding are cost -- it's a cost -- an activity cost basis, essentially. So that is roughly -- the cost of the shutoff is included in the miscellaneous fee study. I don't have that in front of me at this moment. I can pull it up if you give me a minute.

MR. JAGT: It would be part of PWD's Statement 7. It was included in the filing.

MR. DASENT: Mr. Haver, we're directing your attention to PWD Statement 7 and the list of miscellaneous charges that are appended to the testimony of Black & Veatch. And you can see for each type of charge that we assess the costs associated with the shutoff.

MR. HAVER: Again, I'm not asking how you assess it; I'm asking what the actual cost is. How many people go out, how -- what the cost is per work hour, what the supplies are, what the cost of the truck is. What is the cost? Not what you attribute, not what you bill. What is the actual cost of each shutoff?

MR. DASENT: And we tried to capture that in the miscellaneous charges. If you wanted a more detailed discussion, Steve Junod could help you with that as best we could. And if you want a transcript response, we'll try to do that.

MR. HAVER: Thank you. So again, I won't go through the same thing, but I -- if you're going to ask Mr. Junod for that, please ask him for the costs of turning someone on as well.

HEARING OFFICER CHESTNUT: I'm looking at Statement 7, Question 33, page 46, which is: Describe the approach for developing the proposed miscellaneous charges.

And it was updated to reflect current cost inputs including labor, equipment, materials, and contractor costs.

I guess the question is, the cost for the shutoff should reflect the cost to provide that activity. And if so --

MR. JAGT: That's correct.

HEARING OFFICER CHESTNUT: -- is there a difference.

MR. DASENT: Mr. Jagt?

MR. JAGT: Yeah. The effort -- basically that's an effort study, so we do an eval- -- you know, review with the department the number of staff involved, the time that they're involved, the equipment that's involved, and then all of that is added up to determine, like, the costs per activity or the cost of sending someone out to -- for the shutoff.

And the shutoff fee is one of the fees that is evaluated and presented, and it is -- we just didn't have our testimony up because we weren't, you know, originally part of the panel today. But the miscellaneous fee work papers are in exhibit -- or the Appendix A of White Paper 4 of our exhibit, and Schedule BV-4, sorry.

MR. DASENT: Mm-hmm.

MR. JAGT: So -- and I'm still scrolling down to get to the fees.

HEARING OFFICER CHESTNUT: Yeah, VB-4 has supporting calculations.

MR. JAGT: Right. That's correct.

HEARING OFFICER CHESTNUT: So to me, that answers your question.

MR. JAGT: Yeah. I mean, it's -- other than having to pull it up from the pages, it's been filed since the, you know, advance filing.

It's included within the submittal the entire time, so...

It's been on the record.

MR. DASENT: That is --

HEARING OFFICER CHESTNUT: Do you have another question? Do you have another question, Mr. Haver?

MR. HAVER: I was waiting for the number.

HEARING OFFICER CHESTNUT: Well, you can look up the number, can't you?

MR. HAVER: Well, I can't do it now because I don't have the computer capability of being on Zoom and looking at the exhibits.

HEARING OFFICER CHESTNUT: Are you -- one of you guys can pull it up? If not, I'll have to scroll through here.

MR. DASENT: If you see the number --

HEARING OFFICER CHESTNUT: Yeah. I mean --

MR. DASENT: Dave, if you see it,

please share it with us and we'll put this behind us.

MR. JAGT: Sure. Sorry, Appendix A is pretty extensive, so...

HEARING OFFICER CHESTNUT: Yeah.

MR. JAGT: Total costs. All right.

MR. DASENT: I need the Reader's Digest version. How much does this --

MR. JAGT: So the Reader's Digest version is -- it's rounded, approximately $75.

MR. DASENT: Is that for shutoffs or turn-ons?

MR. JAGT: I believe that's for shutoffs.

MR. DASENT: Reconnections, are they different?

MR. MERRITT: Restoration is roughly the same, 75. That's for 2-inch or smaller.

MR. HAVER: Thank you.

I want to revisit the water meter, the new water meters. What is the life expectancy of the new water meters?

MR. DASENT: That's definitely Mr. Junod.

MR. HAVER: I wanted to ask about

what the projected cost savings on a fiscal year are for the new water meters.

MR. DASENT: That is not this panel, and I don't have anybody in the room today that can help with that, but new water meters, you're saying the cost of them and the life expectancy?

MR. HAVER: I'm asking about the total cost in the -- if they were fund -- if the replacement was funded through bonds, the total cost plus whatever the debt service is for that portion of the bond that went to pay for the replacement.

HEARING OFFICER CHESTNUT: Well, I don't think you can do that.

MR. DASENT: I don't know if we could determine that.

HEARING OFFICER CHESTNUT: I think all I'm going to ask Mr. Dasent to provide is the cost of the AMI.

MR. DASENT: Okay.

MR. HAVER: And then the projected cost savings on a fiscal year basis for the new meters?

HEARING OFFICER CHESTNUT: I don't

know what kind of time period that would be looking at.

MR. HAVER: One -- each fiscal year.

MR. DASENT: I don't know if you could break it down that way, but there may be benefits.

HEARING OFFICER CHESTNUT: I don't know if you can break it down like that.

MR. DASENT: Yeah, there may be benefits that are estimated, and we'll share that with you. Whatever we have, we'll share.

MR. HAVER: And then the expected life of the new meter in a residential household.

MR. DASENT: Okay.

MR. HAVER: That's it.

MR. DASENT: Thank you.

HEARING OFFICER CHESTNUT: That's it in terms of your questions or that's it in terms of that question?

MR. HAVER: That's it in terms of my questions. I have all the other questions answered or they cannot be answered or nobody knows whether they can be answered.

HEARING OFFICER CHESTNUT: Okay.

Well, I think that's the end of our witnesses then, isn't it?

MR. DASENT: Yes, it is. And we have transcript responses due by next Wednesday, that should be May 10th, and a brief May 16.

HEARING OFFICER CHESTNUT: Yeah. In terms of the transcript, as I said, when we get them we will post them, and I will let you know. But I do suggest you review the Rate Board's website, because that's not something I have any kind of direct control with.

But it's a two-day transcript. Hopefully we'll get them on a timely basis. But I do want to thank everybody for your participation here. I want to thank Heather for stepping in for Steven. And I want to thank Debbie for doing a great job. Of course, I haven't seen the transcript, but I'm sure it will be an accurate reflection of what happened.

MR. DASENT: Yes.

HEARING OFFICER CHESTNUT: I look forward to seeing your briefs. And one thing, I mean, like I said, I don't have anything directly to do with posting things on the Rate

Board's website. That's Steven, and he's not -- you know, he's in Dan's office.

But I do keep track. So we'll try and make sure that everything is posted that should be posted and as quickly as possible.

MR. DASENT: Okay.

MR. HAVER: I just want to place on the record that after I review the transcript, I may have motions to make before the Water and Sewer Rate Board.

HEARING OFFICER CHESTNUT: Whatever. You can do whatever you want, and it will be addressed as appropriate.

Okay. Then thank you very much, then. This hearing is adjourned.

MR. HAVER: I thought Mr. Ballenger had questions for me.

HEARING OFFICER CHESTNUT: Oh, I'm sorry. Did you, Mr. Ballenger? I thought you said you waived it.

MR. DASENT: He waived it. A little badgering there. If you want to take the bait --

HEARING OFFICER CHESTNUT: Anything else, then, before we adjourn?

MR. DASENT: Thank you.

HEARING OFFICER CHESTNUT: Thank you all again.

(Time noted: 11:01 a.m. EDT)

--o0o--

C E R T I F I C A T I O N

I hereby certify that the proceedings and evidence noted are contained fully and accurately in the stenographic notes taken by me upon the foregoing matter, and that this is a correct transcript of the same.

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