

**SUPPLEMENTAL RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES (SET I)
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 10-14, 21, 32, 47, 59-60, 67, 83-84, 88**

Dated: March 2023

1 **PA-I-10.** IN EXCEL FORMAT, BY YEAR, FOR EACH FISCAL YEAR 2017 TO
2 PRESENT, PLEASE IDENTIFY THE SPECIFIC DOLLAR AMOUNT OF
3 ADMINISTRATIVE COSTS FOR CUSTOMER ASSISTANCE PROGRAMS
4 BUDGETED, DISAGGREGATED BY:
5 A. WAGES;
6 B. BENEFITS;
7 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);
8 D. INFORMATION TECHNOLOGY;
9 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS
10 CALCULATED);
11 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE "OTHER" IS);
12 G. THE TOTAL OF ALL ADMINISTRATIVE COSTS.

13
14 PLEASE IDENTIFY THE PERCENTAGE OF THE ABOVE REFERENCED
15 ADMINISTRATIVE COSTS BUDGETED FOR TAP, SENIOR CITIZEN
16 DISCOUNT, PAYMENT AGREEMENTS AND OTHER PROGRAMS (PLEASE
17 IDENTIFY).

18
19 **RESPONSE:**

20 Please refer to Response Attachment PA-I-10 to 12 for available information regarding
21 administrative costs. The Customer Assistance Program administrative costs are not
22 specifically isolated within the Water Fund Budget, as they are a portion of the costs
23 within the appropriate City Department/Division and class of cost.

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25 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-I-11.** IN EXCEL FORMAT, PLEASE IDENTIFY, BY MONTH SINCE JULY 2017,
2 THE ACTUAL DOLLAR AMOUNT OF ADMINISTRATIVE COSTS
3 EXPENDED ON CUSTOMER ASSISTANCE PROGRAMS,
4 DISAGGREGATED BY:
5 A. WAGES;
6 B. BENEFITS;
7 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);
8 D. INFORMATION TECHNOLOGY;
9 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS
10 CALCULATED);
11 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE "OTHER" IS);
12 G. THE TOTAL OF ALL ADMINISTRATIVE COSTS.

13
14 PLEASE IDENTIFY THE PERCENTAGE OF THE ABOVE REFERENCED
15 ADMINISTRATIVE COSTS EXPENDED FOR TAP, SENIOR CITIZEN
16 DISCOUNT, PAYMENT AGREEMENTS AND OTHER PROGRAMS (PLEASE
17 IDENTIFY).

18
19 **RESPONSE:**

20 See Response Attachment PA-I-10 to 12.

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22 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-I-12.** IN EXCEL FORMAT, BY YEAR, FOR EACH FISCAL YEAR 2017 TO
2 PRESENT, PLEASE IDENTIFY THE SPECIFIC DOLLAR AMOUNT OF
3 CUSTOMER ASSISTANCE PROGRAM ADMINISTRATIVE COSTS
4 CURRENTLY BEING COLLECTED IN PWD BASE RATES,
5 DISAGGREGATED BY:
6 A. WAGES;
7 B. BENEFITS;
8 C. OVERHEAD (INDICATING HOW OVERHEAD WAS CALCULATED);
9 D. INFORMATION TECHNOLOGY;
10 E. CONTINGENCY (INDICATING HOW THE CONTINGENCY WAS
11 CALCULATED);
12 F. OTHER (IDENTIFYING WITH SPECIFICITY WHAT THE "OTHER" IS);
13 G. THE TOTAL OF ALL ADMINISTRATIVE COSTS.

14
15 PLEASE IDENTIFY THE PERCENTAGE OF THE ABOVE REFERENCED
16 ADMINISTRATIVE COSTS EXPENDED FOR TAP, SENIOR CITIZEN
17 DISCOUNT, PAYMENT AGREEMENTS AND OTHER PROGRAMS (PLEASE
18 IDENTIFY).

19
20 **RESPONSE:**

21 Current PWD base rates are based upon the Test Year 2023 cost of service analysis used
22 to establish rates per the 2021 Rate Determination as well as the 2022 Special Rate
23 Proceeding. Base rates reflect the associated test year cost of service. The Customer
24 Assistance Program administrative costs are not specifically isolated in the cost of service
25 analysis, they are a portion of the costs within the appropriate City Department/Division
26 and class of cost.

27
28 Please refer to Response Attachment PA-I-10 to 12 for available information regarding
TAP administrative costs.

1 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Black & Veatch
2 Management Consulting, LLC

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1 **PA-I-13.** IN EXCEL FORMAT, BY YEAR, FOR EACH FISCAL YEAR 2017 TO
2 PRESENT, PLEASE IDENTIFY THE SPECIFIC DOLLAR AMOUNT OF FEES
3 PAID TO EACH CONTRACTED THIRD-PARTY VENDOR AND/OR
4 CONSULTANT REGARDING CUSTOMER ASSISTANCE PROGRAMS,
5 DISAGGREGATED BY VENDOR AND/OR CONSULTANT:
6 A. BUDGETED FOR THE FISCAL YEAR;
7 B. EXPENDED DURING THE FISCAL YEAR;
8 C. INCLUDED IN RATES IN THE FISCAL YEAR.

9
10 **RESPONSE:**

11 Please see Response Attachment PA-I-10 to 12. This response attachment includes the fees
12 paid to contract third party vendors and/or consultants associated with TAP. The
13 Department does not have a report readily available which tracks the fees paid to contract
14 third party vendors and/or consultants associated with other customer assistance programs
15 as requested.

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17 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-I-14.** BY YEAR, FOR EACH FISCAL YEAR 2021 TO PRESENT, PLEASE
2 PROVIDE, FOR EACH THIRD PARTY VENDOR AND/OR CONSULTANT
3 PAID MORE THAN \$100,000 IN THE FISCAL YEAR FOR PURPOSES OF
4 WORKING ON TAP AND/OR CUSTOMER ASSISTANCE PROGRAMS:
5 A. THE SCOPE OF WORK RELATED TO TAP AND/OR CUSTOMER
6 ASSISTANCE PROGRAMS AGREED TO WITH THE CONSULTANT;
7 B. DOLLARS PAID AND REASONABLE LIST OF TASKS.

8
9 **RESPONSE:**

- 10 A. Please see response attachment PA-I-14 for the associated scope of work and tasks.
11 B. Please see Response Attachment PA-I-10 to 12 available information on dollars
12 paid.

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14 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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PA-I-21. PLEASE PROVIDE A COPY OF ALL WRITTEN PRESENTATIONS, MEMOS OR OTHER WRITTEN DOCUMENTS OF ANY NATURE FROM PWD OR WRB (INCLUDING THEIR CONSULTANTS) PROVIDED TO CITY COUNCIL, THE WATER BOARD, THE MAYOR’S OFFICE, OR ANY OTHER PHILADELPHIA MUNICIPAL ENTITY OR OFFICIAL REGARDING TAP FROM JULY 2017 TO PRESENT.

RESPONSE:

See response attachment PA-I-21.

RESPONSE PROVIDED BY: Philadelphia Water Department

1 **PA-I-32.** IN EXCEL FORMAT, PROVIDE A LIST OF EACH NINE DIGIT ZIP CODE
2 COMPRISING, IN WHOLE OR PART, THE PWD SERVICE TERRITORY.
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4 **RESPONSE:**

5 Please see response attachment PA-I-32 PWD Service Territory by Zip Code.
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7 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau
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1 **PA-I-47.** PLEASE PROVIDE A DETAILED DESCRIPTION OF ALL NOTICES OF
2 DELINQUENCY OR POTENTIAL COLLECTION ACTIONS PROVIDED TO
3 RESIDENTIAL CUSTOMERS DURING THE PERIOD OF TIME IN WHICH
4 PWD/WRB WAS NOT TERMINATING ACCOUNTS FOR NONPAYMENT.
5 SEPARATELY PROVIDE A COPY OF EACH SUCH NOTICE PROVIDED TO
6 RESIDENTIAL CUSTOMERS DURING THIS TIME.

7
8 **RESPONSE:**

9 Please see response attachment PA-I-47 for a sample residential customer bill sent prior to
10 the lifting of the shutoff moratorium in July 2022. Any account that was at risk for service
11 termination beginning in May of 2022, also received a bill insert as included in response
12 attachment PA-I-47.

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14 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau
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1 **PA-I-59.** IN EXCEL FORMAT, PLEASE PROVIDE BY MONTH SINCE JANUARY
2 2017:

- 3 A. THE NUMBER OF BUDGETED PWD AND/OR WRB STAFF
4 POSITIONS DEVOTED EXCLUSIVELY TO THE OPERATION OF
5 CUSTOMER ASSISTANCE PROGRAMS.
- 6 B. THE NUMBER OF ACTUAL PWD AND/OR WRB STAFF POSITIONS
7 DEVOTED EXCLUSIVELY TO THE OPERATION OF CUSTOMER
8 ASSISTANCE PROGRAMS.
- 9 C. THE NUMBER OF BUDGETED PWD AND/OR WRB STAFF
10 POSITIONS WHOSE TIME IS DEVOTED PARTIALLY TO THE
11 OPERATION OF CUSTOMER ASSISTANCE PROGRAMS, INCLUDING
12 AN IDENTIFICATION FOR EACH POSITION OF THE PORTION OF
13 TIME DEVOTED TO CUSTOMER ASSISTANCE PROGRAMS.
- 14 D. THE NUMBER OF ACTUAL PWD AND/OR WRB STAFF POSITIONS
15 WHOSE TIME IS DEVOTED PARTIALLY TO THE OPERATION OF
16 CUSTOMER ASSISTANCE PROGRAMS, INCLUDING AN
17 IDENTIFICATION FOR EACH POSITION OF THE PORTION OF TIME
18 DEVOTED TO CUSTOMER ASSISTANCE PROGRAMS.

19
20 **RESPONSE:**

21 The year 2017 was the last year where WRB reported this data on a monthly basis.
22 Currently, WRB's Customer Assistance Division staff positions devote all their time to the
23 operation of customer assistance programs. See response attachment PA-I-59 Staff Report
24 for the current year's budgeted positions for available information responsive to this
25 request.

26
27 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
28

1 **PA-I-60.** PLEASE PROVIDE A COPY OF ALL THIRD PARTY CONTRACTS WITH
2 AN ENTITY OUTSIDE PWD ENTERED INTO SINCE JANUARY 2017:

3 A. REGARDING INFORMATION TECHNOLOGY DEVOTED
4 EXCLUSIVELY TO CUSTOMER ASSISTANCE PROGRAMS AND/OR
5 TAP.

6 B. REGARDING OUTREACH DEVOTED EXCLUSIVELY TO CUSTOMER
7 ASSISTANCE PROGRAMS AND/OR TAP.

8 C. REGARDING ELIGIBILITY VERIFICATION DEVOTED
9 EXCLUSIVELY TO CUSTOMER ASSISTANCE PROGRAMS AND/OR
10 TAP.

11 D. REGARDING INTAKE DEVOTED EXCLUSIVELY TO CUSTOMER
12 ASSISTANCE PROGRAMS AND/OR TAP (IF DIFFERENT FROM "C")
13 (EXPLAIN THE DIFFERENCE, IF ANY).

14
15 **RESPONSE:**

16 A, C-D. PWD/WRB did not enter into any contractual services for information
17 technology devoted exclusively to TAP.

18 B. The City utilized the following vendors for TAP outreach: (i) Philadelphia
19 Metro, (ii) Philadelphia Tribune, (iii) Al Dia, (iv) Radio-One, (v) Iheartmedia,
20 (vi) KYW and (vii) SEPTA.

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22 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau
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1 **PA-I-67.** PLEASE PROVIDE A DETAILED DESCRIPTION OF HOW TRANSLATIONS
2 OF WRITTEN DOCUMENTS PROVIDED TO CUSTOMERS ARE PROVIDED
3 FOR:

- 4 A. CREDIT AND COLLECTION ACTIVITIES (INCLUDING BUT NOT
5 LIMITED TO SHUTOFF NOTICES).
6 B. TAP OUTREACH.
7 C. DEFERRED PAYMENT PLANS.

8
9 INCLUDED WITHIN THESE EXPLANATIONS, PROVIDE A DETAILED
10 EXPLANATION OF THE LANGUAGES PROVIDED, HOW THE CHOICE OF
11 LANGUAGES IS MADE, AND HOW THE WRITTEN DOCUMENTS IN
12 DIFFERENT LANGUAGES ARE DISTRIBUTED.

13
14 **RESPONSE:**

15 Item B was previously answered. For items A and C, please see below.

16
17 The PWD language access plan is available at: [LANGUAGE-ACCESS-PLAN-MARCH-
18 2022 FINAL-Signed.pdf \(phila.gov\)](#).

19
20 The Department of Revenue language access plan is available at:
21 <https://www.phila.gov/media/20170602143453/Revenue-LAP-Final-2017.pdf>.

22
23 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau
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1 **PA-I-83.** PLEASE PROVIDE A DETAILED EXPLANATION OF ALL SHUTOFF
2 PROTECTIONS PROVIDED TO LOW-INCOME OR OTHER VULNERABLE
3 HOUSEHOLDS.
4

5 **RESPONSE:**

6 The new policies relating to shutoff protections that took effect in July 2022 included the
7 following changes: (a) the level of delinquency that triggers a shutoff notice was raised
8 from \$150 to \$1,000; (b) Customers currently enrolled in TAP are exempt from shutoff;
9 (c) Customers currently enrolled in the Senior Citizen Discount program are exempt from
10 shutoff; (d) Customers who have applied for Customer Assistance are exempt from
11 shutoff; and (e) Customers with whom the City can match to internal data to confirm
12 participation in other low-income assistance programs are exempt from shutoff.
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14 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau
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1 **PA-I-84.** PLEASE PROVIDE A DETAILED DESCRIPTION OF ALL WAYS IN WHICH
2 SHUTOFF PROTECTIONS DIFFER DEPENDING ON WHETHER THE
3 RESIDENT OF THE HOME IS:

- 4 A. THE HOMEOWNER;
- 5 B. A TENANT-CUSTOMER;
- 6 C. AN OCCUPANT-CUSTOMER;
- 7 D. A NON-CUSTOMER TENANT; OR
- 8 E. A NON-CUSTOMER OCCUPANT.

9
10 FOR EACH SUCH DIFFERENCE IN SHUTOFF PROTECTION IDENTIFIED,
11 PROVIDE A CITATION TO THE PWD/WRB REGULATION WHICH
12 AUTHORIZES THE DIFFERENT TREATMENT.
13

14 **RESPONSE:**

15 If the customer meets all other shutoff requirements, home-owners, tenant-customers, and
16 occupant-customers are subject to service termination for non-payment of bills. Non-
17 customer tenants and non-customer occupants are not captured with these designations in
18 WRB's system because those accounts are instead categorized by the property owner's
19 status. WRB is currently protecting non-customer tenant-occupied properties and non-
20 customer occupant-occupied properties from shutoff to the extent this information
21 becomes available to WRB. Authority and procedures relating to the shutoff of water
22 service can be found in 100.4 of the Philadelphia Water Department Regulations. Also,
23 please see response to PA-I-83 above.
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27 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau
28

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.

5
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.

12
13 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Water Revenue Bureau
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