

**RESPONSE TO**  
**PUBLIC ADVOCATE'S INTERROGATORIES**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**SET II**  
**QUESTIONS 1-8**

**Dated: April 10, 2024**

**PA-TAP-2-1.** REFERENCE THE RESPONSE TO PA-TAP 1-10(D) (“TOTAL SENIOR CITIZEN DISCOUNT AMOUNT FOR FEBRUARY 2024: \$13,645.03”). PLEASE CONFIRM THAT THIS IS THE TOTAL AMOUNT OF THE SENIOR CITIZEN DISCOUNT PROVIDED TO THE 5,642 CUSTOMERS WHO WERE ENROLLED IN TAP THROUGH THE IDEA PRE-QUALIFICATION PROCESS IN FEBRUARY 2024.

**RESPONSE:**

As described in response to PA-TAP-1, there were 5,642 customers who were TAP participants in February 2024 and were enrolled in TAP through the IDEA pre-qualification process. That set of customers received \$13,645.03 in total senior citizen discounts on their February 2024 bills. Please note that not all 5,642 customers receive a senior citizen discount.

**RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.

**PA-TAP-2-2.** REFERENCE THE RESPONSE TO PA-TAP 1-10(E) (“AVERAGE MONTHLY TAP BILL, AS CALCULATED BASED ON INCOME (PRESUMED AT 133% FPL): \$54.42”). PLEASE EXPLAIN:

- A. WHAT IS THE BASIS FOR THE PRESUMPTION THAT HOUSEHOLD INCOME FOR IDEA PRE-QUALIFIED CUSTOMERS IS 133% FPL?
- B. HAS THE CITY UTILIZED ACTUAL HOUSEHOLD COMPOSITION FOR PURPOSES OF ENROLLING IDEA PRE-QUALIFIED CUSTOMERS? IF NOT, PLEASE EXPLAIN ANY ASSUMPTIONS OR PRESUMPTIONS UTILIZED IN DETERMINING HOUSEHOLD COMPOSITION.
- C. DOES THE CITY INFORM IDEA PRE-QUALIFIED CUSTOMERS OF THE INCOME AND/OR HOUSEHOLD COMPOSITION ASSUMPTIONS/PRESUMPTIONS UTILIZED TO ENROLL THEM IN TAP? IF SO, PLEASE PROVIDE A COPY OF ANY COMMUNICATIONS OR CORRESPONDENCE UTILIZED FOR THAT PURPOSE. IF NOT, PLEASE EXPLAIN WHY NOT.
- D. PLEASE PROVIDE A SAMPLE COPY OF THE CORRESPONDENCE SENT TO IDEA PRE-QUALIFIED CUSTOMERS TO INFORM THEM OF THEIR ENROLLMENT IN TAP.

**RESPONSE:**

- A. Information provided by IDEA included customers who participated in other financial assistance programs which generally have income eligibility requirements of 133% of the federal poverty guideline. Specific income data for each household was not shared, so the maximum income threshold (133%) was provided for each customer, based on their household size.
- B. Information provided by IDEA included the number of household members.
- C. No. WRB does not send letters with personal information used for enrollment, to any customers.
- D. Please see attached for Exhibit TAP-PA-2-2(D).

**RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc

**PA-TAP-2-3.** PLEASE SUPPLEMENT THE RESPONSE TO PA-TAP 1-10 TO INCLUDE INFORMATION REGARDING IDEA PRE-QUALIFIED CUSTOMERS ENROLLED IN TAP IN MARCH 2024.

**RESPONSE:**

Reporting will be provided when the data are available in late April.

**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

**PA-TAP-2-4. REFERENCE THE RESPONSE TO PA-TAP 1-1.**

- A. DOES IDEA PREQUALIFICATION ASSURE THAT THOSE WHO ARE PREQUALIFIED BY IDEA WOULD DEFINITELY BECOME TAP PARTICIPANTS?
- B. IS IDEA PREQUALIFICATION THE SAME (OR EQUIVALENT TO) TAP ENROLLMENT?

**RESPONSE:**

- A. No. See also, response to PA-TAP-2-4(B) below.
- B. No. Pre-qualified customers are included in data provided by IDEA. WRB enrolls customers based on those data once they have reviewed account information. Additionally, WRB is developing an audit program to provide additional quality assurance that discounts are properly based on income eligibility, and that customers are receiving the correct discount.

**RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.

**PA-TAP-2-5.** REFERENCE THE RESPONSE TO PA-TAP 1-1(A). SPECIFICALLY, WHAT ARE THE TAP PROTECTIONS THAT ENROLLED CUSTOMERS RECEIVE IMMEDIATELY.

**RESPONSE:**

All TAP protections that are provided to enrolled customers are specified Sections 206.4, 206.7, and 206.8 of Philadelphia Water Department (PWD) Regulations.

**RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.

**PA-TAP-2-6. REFERENCE THE RESPONSE TO PA-TAP 1-1(B).**

- A. PLEASE EXPLAIN THE PROCESS THAT ENABLES IDEA TO PRE-MATCH CANDIDATES TO THE WRB BILLING SYSTEM.
- B. WAS IT ASSUMED THAT BECAUSE 34,000 CUSTOMERS WERE NOT ALREADY TAP PARTICIPANTS, THEY WOULD SATISFY THE ELIGIBILITY CRITERIA FOR ENROLLMENT?
- C. PLEASE EXPLAIN WHAT “WRB COULD SUSTAIN 12,000 PRE-QUALIFICATION ENROLLMENTS PER MONTH” MEANS.

**RESPONSE:**

- A. WRB’s partnership with the City’s Office of Integrated Data for Evidence and Action (IDEA) is described in Schedule RFC-1. Prequalification through third party programs was a central theme in the 2023 Rate Proceeding, where a recommendation from the Public Advocate’s Direct Testimony (page 4 at line 22) includes entering “into a data-sharing agreement with the appropriate City officials to allow for the use of IDEA data to automatically enroll customers meeting income and residency requirements.” IDEA matches data from other City Departments where customers participated in other assistance programs that generally include eligibility of 133% of the federal poverty guideline, according to that customer’s household size.
- B. The assumption underpinning the prequalification process was that customers that participated in other local assistance programs for low income households would also meet residency and income eligibility criteria for TAP.
- C. As described in PA-TAP-1-1(B), the enrollment process is streamlined so WRB is able to sustain a high *rate* of enrollment as long as there are pre-qualified customers to enroll, based on technology and staffing capability.

**RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.



**PA-TAP-2-7.** REFERENCE THE RESPONSE TO PA-TAP 1-2, HOW MANY OF THE 6,361 INCREASE IN TAP PARTICIPANTS WERE IDEA-PREQUALIFIED ENROLLEES?

**RESPONSE:**

As described in PA-TAP-1-10, there were 5,642 customers who were TAP participants in February 2024 and were enrolled in TAP through the IDEA pre-qualification process.

**RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.

**PA-TAP-2-8.** PLEASE PROVIDE SUPPORT FOR PWD'S ESTIMATE (SEE PAGE 4 OF THE PROPOSED RECONCILIATION STATEMENT FORMAL NOTICE) THAT ITS TAP-R WOULD INCREASE A TYPICAL RESIDENTIAL CUSTOMER'S BILL BY \$4.43. PLEASE SPECIFICALLY EXPLAIN WHY THIS ESTIMATE VARIES FROM THE \$4.60 CALCULATED INCREASE FOR A RESIDENTIAL CUSTOMER USING .45 MCF WITH PROPOSED \$4.19 (WATER) AND \$6.04 (SEWER) TAP-R RATES PER MCF ( $.45 \times (\$4.19 + \$6.04) = \$4.60$ ).

**RESPONSE:**

The estimated increase of a typical residential customer's bill due to the proposed TAP-R rates, as stated on Page 4 of the Proposed Reconciliation Statement Formal Notice, reflects the bill impact associated with the difference in the existing and proposed TAP-R rates.

As presented in Schedule BV-3, the current TAP-R rates, as stated in Section 10 of PWD Rates and Charges Effective September 1, 2023, are \$0.15 per MCF for water and \$0.24 per MCF for sewer.

The difference between the proposed and existing TAP-R rates would be as follows:

- Delta in TAP-R Water Rate =  $(\$4.19 - \$0.15) = \$4.04$  per MCF
- Delta in TAP-R Sewer Rate =  $(\$6.04 - \$0.24) = \$5.80$  per MCF

The bill increase due to the TAP-R adjustment for a typical residential customer using 0.45 MCF would be calculated as follows:  $(0.45 \times (\$4.04 + \$5.80)) = \$4.43$

The above matches the discussion on Page 4 of the Proposed Reconciliation Statement Formal Notice.

**RESPONSE PROVIDED BY:** Black & Veatch