

Public Testimony Re: 2024 TAP-R Reconciliation Proceeding

jra1116

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To:WaterRateBoard <waterrateboard@Phila.gov>

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Hello. My name is James Aleo, [redacted] rd., Philadelphia, PA 19118. I am submitting this written testimony to be included in the public hearing section of the 2024 TAP-R Reconciliation Proceeding.

My objection to the proposed rate increase of the TAP-R surcharge has to do with the method of enrolling new TAP customers. In the February 28, 2024, Advance Notice of Proposed Changes of Rates and Charges Annual Adjustment of TAP-R from Water Commissioner Randy Hayman to the Water/Sewer/Stormwater Rate Board, it is apparent that thousands of customers are being automatically enrolled in the TAP. For example, an excerpt from page 6 of the Advance Notice document states, "**In the eight business days since IDEA enrollment began on February 13 and this writing, roughly 12,000 candidates have been enrolled via IDEA prequalification, and will start receiving TAP bills in the coming days.**"

The automatic pre-qualification of these customers through the city office of IDEA is not problematic if done competently. It greatly relieves the administrative burden on customers and the city employees who would otherwise manually process the applications. However, the Water Regulations under section 206.2 specify that customers must apply for this benefit - "**A Low-income Customer or a Customer with a Special Hardship may apply to the WRB for enrollment in TAP . . .**" There is no place where it mentions that they can be automatically enrolled without any knowledge or effort on their part. Additionally, in the Philadelphia Code in section 19-1605 (3) (h) (h.2) (i) (.1), "Eligibility and Enrollment in IWRAP", it states: "**A Customer shall be enrolled in IWRAP upon approval of a completed application. . .**"

While some might see the above-mentioned distinction in enrollment methods as minor or trivial, I would argue otherwise. Under the proposed rates, non-TAP customers will be required to subsidize TAP customers at the average rate of \$53.16 per year per non-TAP residential customer. It is not unreasonable and, in fact, legally required that low income recipients of this financial aid at least ask for this assistance. The Water Department and the Water Revenue Bureau can certainly send out notices and application forms and perhaps other methods of outreach to low income customers, but formal application and other requirements under this program need to be observed as per section 206.2 of the Water Regulations.

If some eligible low income customers fail to formally apply for the TAP benefit, it is quite possible that the surcharge on non-TAP customers will be reduced, and this should be taken into account when calculating the proposed surcharge.

Sincerely,

James Aleo