

We are submitting this comment on behalf of HELP: MLP<sup>1</sup> to express our concerns about how costly rate increases will affect our clients. HELP: MLP partners with maternal and child health home visiting programs in southeastern Pennsylvania to support families with their civil legal needs. All of the households we serve have children under the age of six. The families we work with have incomes below 300% of the Federal Poverty Line. The vast majority of our adult clients are pregnant or recently postpartum.

As the Philadelphia Water Department recognizes, water is essential, and vulnerable Philadelphians should be protected from shutoff due to nonpayment. The Raise Your Hand initiative, which protects specified households (including those with a child under 18) from shutoff due to an unpaid water bill is an important step forward. While Raise Your Hand protects our client families from water service shutoff, it has significant limitations; most importantly, it cannot protect renters from eviction due to nonpayment of water charges passed through by their landlord.

The vast majority of the families enrolled in our partner programs rent their homes. In Philadelphia, water service is often included as part of a residential lease, with water charges passed through monthly by a landlord who keeps the water bill in their own name. Just like rent charges, these charges can be the basis for a landlord to bring an eviction action in court if unpaid. While there are now mechanisms in place to allow renters to enroll in TAP, many of our clients who rent are unable to complete this enrollment due to landlord refusal or noncompliance with rental licensing requirements. While these families will be protected from a water shutoff as a result of the Raise Your Hand program, they can still be evicted as a result of their inability to pay an unaffordable water bill. Therefore, when water charges become unaffordable, tenants risk becoming behind on rent and facing eviction.

This risk is especially devastating for the most vulnerable tenants. Many of these households are headed by young parents or single parents. While deep poverty rates in Philadelphia are unacceptably high across demographics, we observe that many of our clients' households are in precarious financial situations as a function of their current stage of life. They are often pregnant or recently postpartum, experiencing massive financial instability while taking unpaid maternity leave because they live in a state with no paid family leave protections.

One client of ours, Reina,<sup>2</sup> rents a home for herself and her two year old son. Because the landlord refuses to allow her to put the water bill in her name and get TAP, she is unable to afford the water bill. Every six to 12 months, her water bill escalates to the point where she is at risk of eviction. The Family Advocacy and Integrated Resource (FAIR) Project's Family Support Fund, an emergency fund that supports families enrolled in maternal child health home visiting programs, has paid more than \$3,500 over the last two years to the Philadelphia Water Department so Reina and her son are able to avoid eviction.

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<sup>1</sup> Health, Education, and Legal Assistance Project: A Medical Legal Partnership

<sup>2</sup> This name has been changed to protect our clients' confidentiality.

Most tenants do not have access to the FAIR Project to protect them from eviction like Reina does. Any water rate increases will disproportionately and inevitably harm renters who are unable to enjoy the benefits of the TAP program because their landlord refuses to allow them to enroll or they are not complying with rental licensing requirements, and we ask that you not increase the Water rate any more than necessary to enable the Philadelphia Water Department to continue to provide efficient services.