

OBJECTIONS TO INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS OF THE PUBLIC ADVOCATE

The Philadelphia Water Department (“Department” or “PWD”) responds to the Public Advocate’s Interrogatories and Requests for Production of Documents, PA-RDC 113-124 (the “Interrogatories and Requests”) as follows.

General Objections

1. The Department objects to each Interrogatory and Request insofar as it seeks production or disclosure of documents that require PWD or Raftelis Financial Consultants (“RFC”) to undertake an extensive search for information not within its control or custody. PWD requests that the competing interests of the parties be balanced in the resolution of this discovery dispute which, as described below as to each discovery request, concerns an extensive search which is overly broad and unreasonably burdensome to the Department. PWD notes that appropriate standard to be applied in addressing each contested Interrogatory and Request is set forth in Water Rate Board Regulation 7(b) which specifies that the interest of the requesting and responding participants be weighed taking into account (a) time constraints in the proceeding, (b) the relevance of the requested information to rates and charges and (c) the burden on the responding party.

2. The Department objects to each Interrogatory and Request to the extent that the information requested is equally accessible to the Public Advocate, PWD or to RFC.

3. The Department objects to each Interrogatory and Request to the extent it is duplicative and cumulative.

4. The applicable general objections, as stated above (“General Objections”), are incorporated into each of the specific objections and responses that follow. Stating a specific objection or response shall not be construed as a waiver of these General Objections.

Responses to Interrogatories and Requests for Production of Documents

PA-RDC-113: Please provide:

- a. A comprehensive list identifying each City, Company, department or jurisdiction which provides a water, sewer and/or stormwater low-income assistance program on which you and/or RFC have *not* worked;
- b. Separately identify and provide a single copy of any written document within the knowledge, custody or control of you and/or RFC that presents or otherwise discusses the program design of any such program included on this list;
- c. Separately identify and provide a single copy of any written document within the knowledge, custody or control of you and/or RFC that presents or otherwise discusses the program costs of any such program included on this list;
- d. Separately identify and provide a single copy of any written document within the knowledge, custody or control of you and/or RFC that presents or otherwise discusses the impacts, outcomes or effects of any such program included on this list.

Response: Objection. This interrogatory and request for production of documents unreasonably seeks the compilation of a comprehensive list of cities, companies, departments or jurisdictions that provide water, sewer and/or stormwater assistance programs on which RFC has not worked together with associated documents. The Department objects to this request as it is a “scavenger hunt” which places an unreasonable burden and expense upon PWD in terms of hours to compile the requested information and put it in proper format to transmit to the parties. The Department also objects to this request to the extent that it seeks information that is not in its possession, custody or control (requiring extensive research) and seeks the production of information that is independently available and equally accessible to the Public Advocate. In the alternative, assuming this interrogatory and request for production of documents is permitted, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

PA-RDC-114: For the new or existing Customer Affordability Program on which any RFC staff person worked for the Richmond, Virginia, Department of Public Works, please provide as follows:

- a. The name and mailing address of the utility staff person primarily responsible for the program;
- b. The year in which the program first enrolled low-income participants;
- c. A brief description of the affordability benefits provided by the program to low-income customers;
- d. A brief description of the intake process through which low-income customers enroll in the program;
- e. For the most recent Fiscal Year for which data is available, the number of low-income customers enrolled to receive benefits;
- f. For the most recent Fiscal Year for which data is available, the estimated number of low-income customers eligible to receive benefits;
- g. For the most recent Fiscal Year for which data is available, the dollar amount of lost revenue attributable to discounts or other benefits provided;
- h. For the most recent Fiscal Year for which data is available, the total program cost;
- i. For the most recent Fiscal Year for which data is available, the percentage of total program costs devoted to program administration;
- j. For the most recent Fiscal Year available, the number of Full-Time Equivalent (FTE) staff positions involved with administering the program;
- k. For the most recent Fiscal Year available, the number of FTE staff positions devoted to Information Technology oversight for the program.

Provide such data in your knowledge, custody or control whether or not developed as a work product by you or by RFC staff.

Response: Objection. The Department objects to this interrogatory and request for production of documents to the extent it requires PWD or its consultants to search for and disclose or produce information or documents that are in the possession of third parties, are a matter of public record, or are otherwise accessible to the Public Advocate. Neither PWD or RFC has independent knowledge of (a) the staff persons currently involved in this project; (b) the year in which the program enrolled participants; (c) the description of current program benefits; (d) the

description of the intake process for enrollment implemented; (e) the number of low income customers enrolled to receive benefits; (f) the estimated number of low income customers eligible to receive benefits; (g) the dollar amount of loss revenue attributable to discounts or other benefits provided; (h) total program costs; (i) the percentage of total program costs attributable to administration; (j) the number of FTE's involved in administration; or (k) IT support. The Department also objects to this request because it places an unreasonable burden and expense upon PWD and RFC in terms of hours needed to compile the requested information and put it in proper format to transmit to the parties. Assuming in the alternative, that this interrogatory and request for production of documents is permitted by the hearing officer, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

PA-RDC-115: For the new or existing Customer Affordability Program on which any RFC staff person worked for the Washington Suburban Sanitary Commission (MD), please provide as follows:

- a. The name and mailing address of the utility staff person primarily responsible for the program;
- b. The year in which the program first enrolled low-income participants;
- c. A brief description of the affordability benefits provided by the program to low-income customers;
- d. A brief description of the intake process through which low-income customers enroll in the program;
- e. For the most recent Fiscal Year for which data is available, the number of low-income customers enrolled to receive benefits;
- f. For the most recent Fiscal Year for which data is available, the estimated number of low-income customers eligible to receive benefits;
- g. For the most recent Fiscal Year for which data is available, the dollar amount of lost revenue attributable to discounts or other benefits provided;
- h. For the most recent Fiscal Year for which data is available, the total program cost;
- i. For the most recent Fiscal Year for which data is available, the percentage of total program costs devoted to program administration;
- j. For the most recent Fiscal Year available, the number of Full-Time Equivalent (FTE) staff positions involved with administering the program;
- k. For the most recent Fiscal Year available, the number of FTE staff positions devoted to Information Technology oversight for the program;

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Response: Objection. The Department objects to this interrogatory and request for production of documents to the extent it requires PWD or its consultants to search for and disclose or produce information or documents that are in the possession of third parties, are a matter of public record, or are otherwise accessible to the Public Advocate. Neither PWD or RFC has independent knowledge of (a) the staff persons currently involved in this project; (b) the year in which the program enrolled participants; (c) the description of current program benefits; (d) the

description of the intake process for enrollment implemented; (e) the number of low income customers enrolled to receive benefits; (f) the estimated number of low income customers eligible to receive benefits; (g) the dollar amount of loss revenue attributable to discounts or other benefits provided; (h) the total program costs; (i) the percentage of total program costs attributable to administration; (j) the number of FTE's involved in administration or (k) IT support. The Department also objects to this request because it places an unreasonable burden and expense upon PWD and RFC in terms of hours needed to compile the requested information and put it in proper format to transmit to the parties. Assuming in the alternative, that this interrogatory and request for production of documents is permitted by the hearing officer, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

PA-RDC-116: For the new or existing Customer Affordability Program on which any RFC staff person worked for the City and County of Honolulu (HI) Department of Environmental Services, please provide as follows:

- a. The name and mailing address of the utility staff person primarily responsible for the program;
- b. The year in which the program first enrolled low-income participants;
- c. A brief description of the affordability benefits provided by the program to low-income customers;
- d. A brief description of the intake process through which low-income customers enroll in the program;
- e. For the most recent Fiscal Year for which data is available, the number of low-income customers enrolled to receive benefits;
- f. For the most recent Fiscal Year for which data is available, the estimated number of low-income customers eligible to receive benefits;
- g. For the most recent Fiscal Year for which data is available, the dollar amount of lost revenue attributable to discounts or other benefits provided;
- h. For the most recent Fiscal Year for which data is available, the total program cost;
- i. For the most recent Fiscal Year for which data is available, the percentage of total program costs devoted to program administration;
- j. For the most recent Fiscal Year available, the number of Full-Time Equivalent (FTE) staff positions involved with administering the program;
- k. For the most recent Fiscal Year available, the number of FTE staff positions devoted to Information Technology oversight for the program.

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Response: Objection. The Department objects to this interrogatory and request for production of documents to the extent it requires PWD or its consultants to search for and disclose or produce information or documents that are in the possession of third parties, are a matter of public record, or are otherwise accessible to the Public Advocate. Neither PWD or RFC has independent knowledge of (a) the staff persons currently involved in this project; (b) the year in which the program enrolled participants; (c) the description of current program benefits; (d) the

description of the intake process for enrollment implemented; (e) the number of low income customers enrolled to receive benefits; (f) the estimated number of low income customers eligible to receive benefits; (g) the dollar amount of loss revenue attributable to discounts or other benefits provided; (h) the total program costs; (i) the percentage of total program costs attributable to administration; (j) the number of FTE's involved in administration; or (k) IT support. The Department also objects to this request because it places an unreasonable burden and expense upon PWD and RFC in terms of hours needed to compile the requested information and put it in proper format to transmit to the parties. Assuming in the alternative, that this interrogatory and request for production of documents is permitted by the hearing officer, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

PA-RDC-117: For the new or existing Customer Affordability Program on which any RFC staff person worked for DC Water, please provide as follows:

- a. The name and mailing address of the utility staff person primarily responsible for the program;
- b. The year in which the program first enrolled low-income participants;
- c. A brief description of the affordability benefits provided by the program to low-income customers;
- d. A brief description of the intake process through which low-income customers enroll in the program;
- e. For the most recent Fiscal Year for which data is available, the number of low-income customers enrolled to receive benefits;
- f. For the most recent Fiscal Year for which data is available, the estimated number of low-income customers eligible to receive benefits;
- g. For the most recent Fiscal Year for which data is available, the dollar amount of lost revenue attributable to discounts or other benefits provided;
- h. For the most recent Fiscal Year for which data is available, the total program cost;
- i. For the most recent Fiscal Year for which data is available, the percentage of total program costs devoted to program administration;
- j. For the most recent Fiscal Year available, the number of Full-Time Equivalent (FTE) staff positions involved with administering the program;
- k. For the most recent Fiscal Year available, the number of FTE staff positions devoted to Information Technology oversight for the program.

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Response: Objection. The Department objects to this interrogatory and request for production of documents to the extent it requires PWD or its consultants to search for and disclose or produce information or documents that are in the possession of third parties, are a matter of public record, or are otherwise accessible to the Public Advocate. Neither PWD or RFC has independent knowledge of (a) the staff persons currently involved in this project; (b) the year in which the program enrolled participants; (c) the description of current program benefits; (d) the description of the intake process for enrollment implemented; (e) the number of low income

customers enrolled to receive benefits; (f) the estimated number of low income customers eligible to receive benefits; (g) the dollar amount of loss revenue attributable to discounts or other benefits provided; (h) total program costs; (i) the percentage of total program costs attributable to administration; (j) the number of FTE's involved in administration; or (k) IT support. The Department also objects to this request because it places an unreasonable burden and expense upon PWD and RFC in terms of hours needed to compile the requested information and put it in proper format to transmit to the parties. Assuming in the alternative, that this interrogatory and request for production of documents is permitted by the hearing officer, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

PA-RDC-118: For the new or existing Customer Affordability Program on which any RFC staff person worked for the Columbus (GA) Water Works, please provide as follows:

- a. The name and mailing address of the utility staff person primarily responsible for the program;
- b. The year in which the program first enrolled low-income participants;
- c. A brief description of the affordability benefits provided by the program to low-income customers;
- d. A brief description of the intake process through which low-income customers enroll in the program;
- e. For the most recent Fiscal Year for which data is available, the number of low-income customers enrolled to receive benefits;
- f. For the most recent Fiscal Year for which data is available, the estimated number of low-income customers eligible to receive benefits;
- g. For the most recent Fiscal Year for which data is available, the dollar amount of lost revenue attributable to discounts or other benefits provided;
- h. For the most recent Fiscal Year for which data is available, the total program cost;
- i. For the most recent Fiscal Year for which data is available, the percentage of total program costs devoted to program administration;
- j. For the most recent Fiscal Year available, the number of Full-Time Equivalent (FTE) staff positions involved with administering the program;
- k. For the most recent Fiscal Year available, the number of FTE staff positions devoted to Information Technology oversight for the program.

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Response: Objection. The Department objects to this interrogatory and request for production of documents to the extent it requires PWD or its consultants to search for and disclose or produce information or documents that are in the possession of third parties, are a matter of public record, or are otherwise accessible to the Public Advocate. Neither PWD or RFC has independent knowledge of (a) the staff persons currently involved in this project; (b) the year in which the program enrolled participants; (c) the description of current program benefits; (d) the description of the intake process for enrollment implemented; (e) the number of low income customers enrolled to receive benefits; (f) the estimated number of low income customers eligible to receive benefits; (g) the dollar amount of loss revenue attributable to discounts or other

benefits provided; (h) the total program costs; (i) the percentage of total program costs attributable to administration; (j) the number of FTE's involved in administration; or (k) IT support. The Department also objects to this request because it places an unreasonable burden and expense upon PWD and RFC in terms of hours needed to compile the requested information and put it in proper format to transmit to the parties. Assuming in the alternative, that this interrogatory and request for production of documents is permitted by the hearing officer, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

PA-RDC-119: For the new or existing Customer Affordability Program on which any RFC staff person worked for the Birmingham (AL) Water Works Board, please provide as follows:

- a. The name and mailing address of the utility staff person primarily responsible for the program;
- b. The year in which the program first enrolled low-income participants;
- c. A brief description of the affordability benefits provided by the program to low-income customers;
- d. A brief description of the intake process through which low-income customers enroll in the program;
- e. For the most recent Fiscal Year for which data is available, the number of low-income customers enrolled to receive benefits;
- f. For the most recent Fiscal Year for which data is available, the estimated number of low-income customers eligible to receive benefits;
- g. For the most recent Fiscal Year for which data is available, the dollar amount of lost revenue attributable to discounts or other benefits provided;
- h. For the most recent Fiscal Year for which data is available, the total program cost;
- i. For the most recent Fiscal Year for which data is available, the percentage of total program costs devoted to program administration;
- j. For the most recent Fiscal Year available, the number of Full-Time Equivalent (FTE) staff positions involved with administering the program;
- k. For the most recent Fiscal Year available, the number of FTE staff positions devoted to Information Technology oversight for the program.

Provide such data in your knowledge, custody or control whether or not developed as a work product by you or by RFC staff.

Response: Objection. The Department objects to this interrogatory and request for production of documents to the extent it requires PWD or its consultants to search for and disclose or produce information or documents that are in the possession of third parties, are a matter of public record, or are otherwise accessible to the Public Advocate. Neither PWD or RFC has independent knowledge of (a) the staff persons currently involved in this project; (b) the year in which the program enrolled participants; (c) the description of current program benefits; (d) the description of the intake process for enrollment implemented; (e) the number of low income customers enrolled to receive benefits; (f) the estimated number of low income customers eligible

to receive benefits; (g) the dollar amount of loss revenue attributable to discounts or other benefits provided; (h) the total program costs; (i) the percentage of total program costs attributable to administration; (j) the number of FTE's involved in administration; or (k) IT support. The Department also objects to this request because it places an unreasonable burden and expense upon PWD and RFC in terms of hours needed to compile the requested information and put it in proper format to transmit to the parties. Assuming in the alternative, that this interrogatory and request for production of documents is permitted by the hearing officer, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

PA-RDC-120: For the new or existing Customer Affordability Program on which any RFC staff person worked for the City of Jackson (MS), please provide as follows:

- a. The name and mailing address of the utility staff person primarily responsible for the program;
- b. The year in which the program first enrolled low-income participants;
- c. A brief description of the affordability benefits provided by the program to low-income customers;
- d. A brief description of the intake process through which low-income customers enroll in the program;
- e. For the most recent Fiscal Year for which data is available, the number of low-income customers enrolled to receive benefits;
- f. For the most recent Fiscal Year for which data is available, the estimated number of low-income customers eligible to receive benefits;
- g. For the most recent Fiscal Year for which data is available, the dollar amount of lost revenue attributable to discounts or other benefits provided;
- h. For the most recent Fiscal Year for which data is available, the total program cost;
- i. For the most recent Fiscal Year for which data is available, the percentage of total program costs devoted to program administration;
- j. For the most recent Fiscal Year available, the number of Full-Time Equivalent (FTE) staff positions involved with administering the program;
- k. For the most recent Fiscal Year available, the number of FTE staff positions devoted to Information Technology oversight for the program.

Provide such data in your knowledge, custody or control whether or not developed as a work product by you or by RFC staff.

Response: Objection. The Department objects to this interrogatory and request for production of documents to the extent it requires PWD or its consultants to search for and disclose or produce information or documents that are in the possession of third parties, are a matter of public record, or are otherwise accessible to the Public Advocate. Neither PWD or RFC has independent knowledge of (a) the staff persons currently involved in this project; (b) the year in which the program enrolled participants; (c) the description of current program benefits; (d) the description of the intake process for enrollment implemented; (e) the number of low income

customers enrolled to receive benefits; (f) the estimated number of low income customers eligible to receive benefits; (g) the dollar amount of loss revenue attributable to discounts or other benefits provided; (h) the total program costs; (i) the percentage of total program costs attributable to administration; (j) the number of FTE's involved in administration; or (k) IT support. The Department also objects to this request because it places an unreasonable burden and expense upon PWD and RFC in terms of hours needed to compile the requested information and put it in proper format to transmit to the parties. Assuming in the alternative, that this interrogatory and request for production of documents is permitted by the hearing officer, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

PA-RDC-121: For the new or existing Customer Affordability Program on which any RFC staff person worked for the Charlotte-Mecklenburg (NC) Utilities, please provide as follows:

- a. The name and mailing address of the utility staff person primarily responsible for the program;
- b. The year in which the program first enrolled low-income participants;
- c. A brief description of the affordability benefits provided by the program to low-income customers;
- d. A brief description of the intake process through which low-income customers enroll in the program;
- e. For the most recent Fiscal Year for which data is available, the number of low-income customers enrolled to receive benefits;
- f. For the most recent Fiscal Year for which data is available, the estimated number of low-income customers eligible to receive benefits;
- g. For the most recent Fiscal Year for which data is available, the dollar amount of lost revenue attributable to discounts or other benefits provided;
- h. For the most recent Fiscal Year for which data is available, the total program cost;
- i. For the most recent Fiscal Year for which data is available, the percentage of total program costs devoted to program administration;
- j. For the most recent Fiscal Year available, the number of Full-Time Equivalent (FTE) staff positions involved with administering the program;
- k. For the most recent Fiscal Year available, the number of FTE staff positions devoted to Information Technology oversight for the program.

Provide such data in your knowledge, custody or control whether or not developed as a work product by you or by RFC staff.

Response: Objection. The Department objects to this interrogatory and request for production of documents to the extent it requires PWD or its consultants to search for and disclose or produce information or documents that are in the possession of third parties, are a matter of public record, or are otherwise accessible to the Public Advocate. Neither PWD or RFC has independent knowledge of (a) the staff persons currently involved in this project; (b) the year in which the program enrolled participants; (c) the description of current program benefits; (d) the

description of the intake process for enrollment implemented; (e) the number of low income customers enrolled to receive benefits; (f) the estimated number of low income customers eligible to receive benefits; (g) the dollar amount of loss revenue attributable to discounts or other benefits provided; (h) the total program costs; (i) the percentage of total program costs attributable to administration; (j) the number of FTE's involved in administration; or (k) IT support. The Department also objects to this request because it places an unreasonable burden and expense upon PWD and RFC in terms of hours needed to compile the requested information and put it in proper format to transmit to the parties. Assuming in the alternative, that this interrogatory and request for production of documents is permitted by the hearing officer, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

PA-RDC-122: For the new or existing Customer Affordability Program on which any RFC staff person worked for Northeast Ohio Regional Sewer District, please provide as follows:

- a. The name and mailing address of the utility staff person primarily responsible for the program;
- b. The year in which the program first enrolled low-income participants;
- c. A brief description of the affordability benefits provided by the program to low-income customers;
- d. A brief description of the intake process through which low-income customers enroll in the program;
- e. For the most recent Fiscal Year for which data is available, the number of low-income customers enrolled to receive benefits;
- f. For the most recent Fiscal Year for which data is available, the estimated number of low-income customers eligible to receive benefits;
- g. For the most recent Fiscal Year for which data is available, the dollar amount of lost revenue attributable to discounts or other benefits provided;
- h. For the most recent Fiscal Year for which data is available, the total program cost;
- i. For the most recent Fiscal Year for which data is available, the percentage of total program costs devoted to program administration;
- j. For the most recent Fiscal Year available, the number of Full-Time Equivalent (FTE) staff positions involved with administering the program;
- k. For the most recent Fiscal Year available, the number of FTE staff positions devoted to Information Technology oversight for the program.

Provide such data in your knowledge, custody or control whether or not developed as a work product by you or by RFC staff.

Response: Objection. The Department objects to this interrogatory and request for production of documents to the extent it requires PWD or its consultants to search for and disclose or produce information or documents that are in the possession of third parties, are a matter of public record, or are otherwise accessible to the Public Advocate. Neither PWD or RFC has independent knowledge of (a) the staff persons currently involved in this project; (b) the year in

which the program enrolled participants; (c) description of current program benefits; (d) the description of the intake process for enrollment implemented; (e) the number of low income customers enrolled to receive benefits; (f) the estimated number of low income customers eligible to receive benefits; (g) the dollar amount of loss revenue attributable to discounts or other benefits provided; (h) the total program costs; (i) the percentage of total program costs attributable to administration; (j) the number of FTE's involved in administration; or (k) IT support. The Department also objects to this request because it places an unreasonable burden and expense upon PWD and RFC in terms of hours needed to compile the requested information and put it in proper format to transmit to the parties. Assuming in the alternative, that this interrogatory and request for production of documents is permitted by the hearing officer, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

PA-RDC-123: For the new or existing Customer Affordability Program on which any RFC staff person worked for the City of Johnson City (TN), please provide as follows:

- a. The name and mailing address of the utility staff person primarily responsible for the program;
- b. The year in which the program first enrolled low-income participants;
- c. A brief description of the affordability benefits provided by the program to low-income customers;
- d. A brief description of the intake process through which low-income customers enroll in the program;
- e. For the most recent Fiscal Year for which data is available, the number of low-income customers enrolled to receive benefits;
- f. For the most recent Fiscal Year for which data is available, the estimated number of low-income customers eligible to receive benefits;
- g. For the most recent Fiscal Year for which data is available, the dollar amount of lost revenue attributable to discounts or other benefits provided;
- h. For the most recent Fiscal Year for which data is available, the total program cost;
- i. For the most recent Fiscal Year for which data is available, the percentage of total program costs devoted to program administration;
- j. For the most recent Fiscal Year available, the number of Full-Time Equivalent (FTE) staff positions involved with administering the program;
- k. For the most recent Fiscal Year available, the number of FTE staff positions devoted to Information Technology oversight for the program.

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Response: Objection. The Department objects to this interrogatory and request for production of documents to the extent it requires PWD or its consultants to search for and disclose or produce information or documents that are in the possession of third parties, are a matter of public record, or are otherwise accessible to the Public Advocate. Neither PWD or RFC has

independent knowledge of (a) the staff persons currently involved in this project; (b) the year in which the program enrolled participants; (c) description of current program benefits; (d) the description of the intake process for enrollment implemented; (e) the number of low income customers enrolled to receive benefits; (f) the estimated number of low income customers eligible to receive benefits; (g) the dollar amount of loss revenue attributable to discounts or other benefits provided; (h) the total program costs; (i) the percentage of total program costs attributable to administration; (j) the number of FTE's involved in administration; or (k) IT support. The Department also objects to this request because it places an unreasonable burden and expense upon PWD and RFC in terms of hours needed to compile the requested information and put it in proper format to transmit to the parties. Assuming in the alternative, that this interrogatory and request for production of documents is permitted by the hearing officer, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

PA-RDC-124: For the new or existing Customer Affordability Program on which for the City of San Antonio (TX), please provide as follows:

- a. The name and mailing address of the utility staff person primarily responsible for the program;
- b. The year in which the program first enrolled low-income participants;
- c. A brief description of the affordability benefits provided by the program to low-income customers;
- d. A brief description of the intake process through which low-income customers enroll in the program;
- e. For the most recent Fiscal Year for which data is available, the number of low-income customers enrolled to receive benefits;
- f. For the most recent Fiscal Year for which data is available, the estimated number of low-income customers eligible to receive benefits;
- g. For the most recent Fiscal Year for which data is available, the dollar amount of lost revenue attributable to discounts or other benefits provided;
- h. For the most recent Fiscal Year for which data is available, the total program cost;
- i. For the most recent Fiscal Year for which data is available, the percentage of total program costs devoted to program administration;
- j. For the most recent Fiscal Year available, the number of Full-Time Equivalent (FTE) staff positions involved with administering the program;
- k. For the most recent Fiscal Year available, the number of FTE staff positions devoted to Information Technology oversight for the program.

Provide such data in your knowledge, custody or control whether or not developed as a work product by you or by RFC staff.

Response: Objection. The Department objects to this interrogatory and request for production of documents to the extent it requires PWD or its consultants to search for and disclose or produce information or documents that are in the possession of third parties, are a matter of

public record, or are otherwise accessible to the Public Advocate. Neither PWD or RFC has independent knowledge of (a) the staff persons currently involved in this project; (b) the year in which the program enrolled participants; (c) the description of current program benefits; (d) the description of the intake process for enrollment implemented; (e) the number of low income customers enrolled to receive benefits; (f) the estimated number of low income customers eligible to receive benefits; (g) the dollar amount of loss revenue attributable to discounts or other benefits provided; (h) total program costs; (i) the percentage of total program costs attributable to administration; (j) the number of FTE's involved in administration; or (k) IT support. The Department objects to this request because it places an unreasonable burden and expense upon PWD and RFC in terms of hours needed to compile the requested information and put it in proper format to transmit to the parties. Assuming in the alternative, that this interrogatory and request for production of documents is permitted by the hearing officer, PWD asserts that additional time would be needed to respond given its scope and the attendant research that would be required.

WHEREFORE, the Department formally objects to the Interrogatories and Requests identified above and requests that its Objections be sustained and that it be relieved of the requirement of any further response to same except as described above.

Respectfully submitted,

/s/ Andre C. Dasent

Andre C. Dasent, Esquire
Attorney for Philadelphia Water Department

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