

**BEFORE THE PHILADELPHIA WATER, SEWER AND STORM WATER  
RATE BOARD**

**In the Matter of a Proposed Rate Increase in** :  
**Water, Sewer and Storm Water Rates** : **FY 2017-2018 Rates**

**Public Advocate's Interrogatories & Requests for Production of Documents**

Instructions: Please respond to the following Interrogatories and Requests for Production of Documents. Please repeat the interrogatory and provide the name of the person providing the response. Please provide copies of all replies in PDF and/or XLS format via email and/or on CDs.

PA-RDC-90. Reference: Management Audit, page 69. Please identify the specific type of payment plan offered by PWD that requires "allowable expenses" to be deducted from income to determine eligibility. Separately indicate all eligibility requirements, other than income minus expenses, required to qualify for this payment plan.

PA-RDC-91. Reference: Management Audit, page 69. Confirm or deny. RFC's Management Audit confirmed that PWD determines eligibility for the payment plan type identified in the immediately preceding data request by requiring households seeking a payment plan to submit household expenses, determining which of those expenses are "allowable" and deducting those allowable expenses from income to determine eligibility. If denied, provide a detailed explanation of the meaning of the sentence: "Expenses are reviewed as part of the low income payment agreement application review process, during which the applicant's allowance expenses are calculated and deducted from their income to determine their eligibility."

PA-RDC-92. Reference: Management Audit, page 69: In calculating "allowable expenses" and deducting allowable expenses from income to determine payment plan eligibility, please provide:

- a. A detailed explanation of who determines what expenses are "allowable";
- b. A complete list of all "allowable expenses";
- c. A confirmation or denial that any expense that is not on the list of "allowable expenses" is, by definition, not allowable;
- d. The level of an allowable expenses, in dollars, up to the point where any expense above this otherwise allowable expense becomes disallowed;
- e. The basis for assessing whether an expense is allowable or is not allowable.

- PA-RDC-93. Reference: Management Audit, page 69. Please identify for each allowance expense the documentation that a customer must submit to PWD to affirm or verify that he or she incurred that expense.
- PA-RDC-94. Reference: Management Audit, page 69. Please provide a copy of all written notices, of any nature, provided to customers identifying for the customer the full list of allowable expenses, the level above which those expenses become disallowable, and the fact that payment plan eligibility will depend in whole or part upon PWD deducting those allowable expenses from income to determine eligibility.
- PA-RDC-95. Reference: Management Audit, page 69: In calculating allowable expenses and deducting those expenses from income to determine payment plan eligibility, provide the estimated number of person hours devoted annually to this process. Separately provide this estimated number of person hours:
- a. On a per-applicant basis; and
  - b. On an aggregated annual basis.
- PA-RDC-96. Reference: Management Audit, page 69: Please provide the number of hours estimated to be devoted annually to the process by which “the clerical staff obtains the information needed to manually generate the notification letters from the application files and draft letters to communicate those results to the customer.” Separately provide this estimated number of person hours:
- a. On a per-applicant basis; and
  - b. On an aggregated annual basis.
- PA-RDC-97. Reference: Management Audit, page 71. For each of the 60% of peer utilities having a customer assistance program which reduces the utility bill, please provide:
- a. The estimated number of person hours devoted annually to ongoing program administration in aggregate annual hours;
  - b. The aggregate dollars expended annually for ongoing program administration;
  - c. The dollars expended annually for ongoing program administration as a percentage of total program costs;
  - d. The estimated number of person hours devoted annually to ongoing IT support for the customer assistance program;
  - e. The aggregate dollars expended annually for ongoing IT support for the customer assistance program;
  - f. The dollars expended annually for ongoing IT support for the customer assistance program as a percentage of total program costs.

- PA-RDC-98. Reference: Management Audit, page 71. For each of the eight (8) peer utilities having a low income customer assistance program, please provide:
- a. The estimated number of person hours devoted annually to ongoing program administration in aggregate annual hours;
  - b. The aggregate dollars expended annually for ongoing program administration;
  - c. The dollars expended annually for ongoing program administration as a percentage of total program costs;
  - d. The estimated number of person hours devoted annually to ongoing IT support for the customer assistance program;
  - e. The aggregate dollars expended annually for ongoing IT support for the customer assistance program;
  - f. The dollars expended annually for ongoing IT support for the customer assistance program as a percentage of total program costs.

PA-RDC-99. Reference: Management Audit, page 71. Please provide a complete list of the “many opportunities for policy framework solutions” referenced to “improve this particular set of processes” (i.e., “administering assistance program”). For each of the identified “policy framework solutions” listed, provide both the business case cost-benefit analysis prepared in support of the policy framework solution and the calculation or estimation of the impact on staff resources (up or down) from adopting each “policy framework solution.”

PA-RDC-100. Reference: Management Audit, page 71. Please provide a complete list of the “many opportunities for . . . process modifications to improve this particular set of processes” (i.e., “administering assistance program”). For each of the identified “process modifications” listed, provide both the business case cost-benefit analysis prepared in support of the process modification and the calculation or estimation of the impact on staff resources (up or down) from adopting each “process modification.”

- PA-RDC-101. Reference: Management Audit, page 78. Please provide a complete list of “benchmarking survey results” in the possession and/or control of RFC against which WRB practices were evaluated relating to:
- a. The design of a low-income bill affordability program for water, electricity and/or natural gas utilities. For each such result, indicate whether it was from a water, electricity or natural gas utility, as well as whether it was from a state regulated or a non-state regulated utility.
  - b. The ongoing administration of a low-income bill affordability program for water, electricity and/or natural gas utilities. For each such result, indicate whether it was from a water, electricity or natural gas utility, as well as whether it was from a state regulated or a non-state regulated utility.

PA-RDC-102. Reference: Management Audit, page 78. Please provide a complete list of “known industry best practices” in the possession and/or control of RFC against which WRB practices were evaluated relating to:

- a. The design of a low-income bill affordability program for water, electricity and/or natural gas utilities. For each such “known industry best practice,” indicate whether it was from a water, electricity or natural gas utility, as well as whether it was from a state regulated or a non-state regulated utility.
- b. For each such “known industry best practice,” separately indicate who determined the practice to be a “best practice.”
- c. The ongoing administration of a low-income bill affordability program for water, electricity and/or natural gas utilities. For each such result, indicate whether it was from a water, electricity or natural gas utility, as well as whether it was from a state regulated or a non-state regulated utility.
- d. For each such “known industry best practice,” separately indicate who determined the practice to be a “best practice.”

PA-RDC-103. Reference. Management Audit, page 79. Please provide a complete list of “other City functions, such as social services, or other utility service providers” with which PWD might recognize “opportunities for efficiency via consolidating [its] customer assistance programs. . .”

PA-RDC-104. Reference: Management Audit, page 79. For each “other City functions, such as social services, or other utility service providers” identified in the immediately preceding data request:

- a. provide a detailed description of the “consolidation” that might be available with PWD customer assistance programs;
- b. separately provide a detailed description of the improvement in “efficiencies” that might arise from a “consolidation” with PWD customer assistance programs.

PA-RDC-105. Reference. Management Audit, page 80. Please provide a detailed description of “the ongoing effort to update the functionality of Basis2 application to remove the need for a separate WRAP database. . .[which] is underway as a result of a previous management study performed for the Bureau.” Separately provide:

- a. The person-hours devoted to date to this “updated functionality”;
- b. The person-hours estimated yet to be devoted to this “updated functionality”;
- c. The dollars devoted to date to this “updated functionality”; and
- d. The dollars estimated yet to be devoted to this “updated functionality.”

PA-RDC-106. Reference: Management Audit, page 84. Please provide all City (PWD/WRB) written responses, including e-mails, to the Management Audit

recommendation that WRB should “entirely or partially outsource qualification and requalification to another agency that also provides social services based on set criteria.”

PA-RDC-107. Reference: Davis testimony, page 3 - 4. Please provide a detailed explanation of the extent to which, if at all, PWD’s estimate of the number of person-hours devoted to the ongoing administration of a low-income bill affordability program assumes the adoption or the non-adoption of the RFC recommendations that:

- a. WRB entirely or partially outsource qualification and requalification to another agency that also provides social services based on set criteria;
- b. WRB copy qualification criteria from another utility’s (PECO or PGW) local assistance program to streamline processing;
- c. WRB streamline processes to limit redundancy in the workflow;
- d. The City establish electronic application processing capabilities;
- e. The City establish a more robust electronic application log in and referencing system to make the search and location of applications more efficient and transparent.

PA-RDC-108. Reference: Davis testimony, pages 3 - 4. Please provide a detailed explanation of the extent to which, if at all, PWD’s estimate of the number of person-hours devoted to ongoing IT support assumes the adoption or the non-adoption of the RFC recommendations that:

- a. WRB entirely or partially outsource qualification and requalification to another agency that also provides social services based on set criteria;
- b. WRB copy qualification criteria from another utility’s (PECO or PGW) local assistance program to streamline processing;
- c. WRB streamline processes to limit redundancy in the workflow;
- d. The City establish electronic application processing capabilities;
- e. The City establish a more robust electronic application log in and referencing system to make the search and location of applications more efficient and transparent.

PA-RDC-109. Reference: PA-RDC-10 and PA-RDC-14; Management Audit, pages 64 - 65. Given a hypothetical customer with bills and payments as set forth in the following table, please fill in Columns C – H of the remainder of the table. Please provide as an active spreadsheet with all formulae intact.

	A	B	C	D	E	F	G	H
Month	Bill for Current Service	Payment Received	Late Payment Charge	Payment Applied to Unpaid Bill for Current Service	Payment Applied to Unpaid Late Charge	Cumulative Unpaid Bill for Current Service	Cumulative Unpaid Late Payment Charge	Cumulative Unpaid Balance
Jan 1	\$350.00							
Feb 1	\$300.00							
Mar 1	\$200.00							
Apr 1	\$100.00							
April 10		(\$50.00)						
May 1	\$60.00							
May 10		(\$50.00)						
Jun 1	\$60.00							
Jul 1	\$60.00							
Aug 1	\$60.00							
Sep 1	\$60.00	(\$50.00)						
Sep 10		(\$50.00)						
Oct 1	\$75.00							
Oct 10		(\$200.00)						
Nov 1	\$75.00							
Nov 10		\$150.00)						
Dec 1	\$200.00							

PA-RDC-110. Reference: PA-RDC-10 and PA-RDC-14; Management Audit, page 64 - 65. Given a hypothetical customer with bills and payments as set forth in the following table, please fill in Columns C – G of the remainder of the table. Please provide as an active spreadsheet with all formulae intact.

	A	B	C	D	E	F	G
Month	Bill for Current Service	Payment Received	Account Balance Against which Late Payment Charge Levied	Percentage Late Payment Charge Levied	Dollar of Late Payment Charge Imposed	Cumulative Unpaid Balance for Current Service Owing	Cumulative Unpaid Late Payment Charge Owing
Jan 1	\$350.00						
Feb 1	\$300.00						
Mar 1	\$200.00						
Apr 1	\$100.00						
April 10		(\$50.00)					
May 1	\$60.00						
May 10		(\$50.00)					
Jun 1	\$60.00						
Jul 1	\$60.00						
Aug 1	\$60.00						
Sep 1	\$60.00	(\$50.00)					
Sep 10		(\$50.00)					
Oct 1	\$75.00						
Oct 10		(\$200.00)					
Nov 1	\$75.00						
Nov 10		\$150.00)					
Dec 1	\$200.00						