

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-37

Dated: March 2021

1 **PA-XI-1.** REFERENCE PWD RESPONSE TO PA II-57, FOR EACH PHILADELPHIA
2 ZIP CODE, PROVIDE THE NUMBER OF PROPERTIES WHERE LIENS
3 HAVE BEEN FILED FOR TAP PARTICIPANTS DUE TO AN UNPAID
4 WATER BILL.

5
6 **RESPONSE:**

7 Please see response attachment PA-XI-1 Liens Against TAP Participants.

8
9 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and RaVonne A.
10 Muhammed, Water Revenue Bureau

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-2.** FOR CALENDAR YEARS 2017 THROUGH PRESENT, FOR EACH
2 PHILADELPHIA ZIP CODE, PROVIDE THE NUMBER OF TAP DENIALS.
3

4 **RESPONSE:**

5 The table below summarizes the number of customer assistance applications that were
6 denied in each calendar year for ineligibility or incompleteness. Note that these are counts
7 of applications, not customers or accounts. Applications that were approved for any
8 assistance program or were found to have no assistance program be the most affordable
9 alternative are not included.
10

ZIP Code	2017	2018	2019	2020
19104	63	104	126	63
19107	1	2	1	3
19111	45	172	178	119
19114	10	71	49	35
19115	12	39	35	25
19116	12	30	40	22
19119	30	71	93	45
19120	125	357	424	203
19121	61	160	165	68
19122	25	45	65	21
19123	8	15	16	4
19124	120	334	401	202
19125	26	64	51	29
19126	36	99	84	57
19128	12	36	43	14
19129	12	26	30	14
19130	4	12	13	6
19131	98	254	239	110
19132	139	352	371	172
19133	71	191	203	91
19134	102	313	332	158
19135	57	158	160	84
19136	39	99	96	66
19137	9	31	32	19
19138	99	254	273	132
19139	107	238	281	129
19140	144	363	440	214

ZIP Code	2017	2018	2019	2020
19141	71	170	232	90
19142	73	165	246	104
19143	178	415	461	222
19144	69	182	199	88
19145	63	155	169	77
19146	49	144	135	63
19147	14	20	38	22
19148	49	169	154	85
19149	63	186	192	120
19150	66	143	141	69
19151	68	204	208	101
19152	16	76	75	52
19153	20	59	66	17
19154	27	70	62	46
19106	0	1	0	0
19118	0	2	2	1
19127	0	7	1	4
19103	0	0	0	3

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-XI-3.** REFERENCE PWD STATEMENT 5 (PAGE 12), PLEASE IDENTIFY THE
2 NUMBER OF SUSPENDED PWD ACCOUNTS AS OF MARCH 1, 2020.

3

4 **RESPONSE:**

5 Preparation of this response is in progress and will be provided in the future.

6

7 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Raftelis Financial
8 Consultants, Inc.

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 **PA-XI-4.** FOR THE ACCOUNTS IDENTIFIED IN RESPONSE TO PA XI-3, PLEASE
2 PROVIDE THE FOLLOWING:

- 3 A. THE NUMBER OF ACCOUNTS PWD HAS BEEN ABLE TO RESTORE;
4 B. THE NUMBER OF ACCOUNTS PWD HAS BEEN UNABLE TO RESTORE
5 DUE TO UNSAFE PLUMBING CONDITIONS;
6 C. THE NUMBER OF ACCOUNTS PWD HAS BEEN UNABLE TO RESTORE
7 DUE TO REASONS OTHER THAN UNSAFE PLUMBING CONDITIONS;

8
9 **RESPONSE:**

10 Preparation of this response is in progress and will be provided in the future.
11

12 **RESPONSE PROVIDED BY:** Philadelphia Water Department
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-5.** FOR EACH PHILADELPHIA ZIP CODE, PROVIDE THE NUMBER OF
2 ACCOUNTS THAT WERE RESTORED SINCE MARCH 2020.

3

4 **RESPONSE:**

5 Preparation of this response is in progress and will be provided in the future.

6

7 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 **PA-XI-6.** PLEASE DESCRIBE ALL OUTREACH AND COMMUNICATION EFFORTS
2 THAT PWD HAS PROVIDED TO ACCOUNTS THAT WERE RESTORED
3 SINCE MARCH 2020.
4

5 **RESPONSE:**

6 Please refer to attachment PA-VIII-5 Outreach During Moratorium as well as PA-XI-6 Door
7 Hanger. These were placed on every property that was restored.
8

9 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-7.** PLEASE DESCRIBE ALL TAP OUTREACH THAT PWD HAS PROVIDED TO
2 ACCOUNTS THAT WERE RESTORED SINCE MARCH 2020.
3

4 **RESPONSE:**

5 Please refer to attachment PA-VIII-5 TAP Outreach During Moratorium.
6

7 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-8.** PLEASE STATE THE NUMBER OF TAP APPLICATIONS THAT HAVE
2 BEEN REQUESTED BY ACCOUNTS THAT WERE RESTORED SINCE
3 MARCH 2020.

4
5 **RESPONSE:**

6 Preparation of this response is in progress and will be provided in the future.

7
8 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-9.** PLEASE STATE THE NUMBER OF TAP APPLICATIONS THAT HAVE
2 BEEN APPROVED ON ACCOUNTS THAT WERE RESTORED SINCE
3 MARCH 2020.
4

5 **RESPONSE:**

6 Preparation of this response is in progress and will be provided in the future.
7

8 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-10.** PLEASE STATE THE TOTAL DOLLAR AMOUNT OF PAYMENTS THAT
2 PWD HAS RECEIVED FROM ACCOUNTS THAT WERE RESTORED SINCE
3 MARCH 2020.
4

5 **RESPONSE:**

6 Preparation of this response is in progress and will be provided in the future.
7

8 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-11.** PLEASE DESCRIBE HOW PWD TRACKS THE LANGUAGE NEEDS OF ITS
2 CUSTOMERS.

3
4 **RESPONSE:**

5 PWD uses current available census data and produces a web-based map to display
6 predominant language spoken for each census tract. A related series of maps show the three
7 highest languages spoken after English, based on the number of residents speaking that
8 language in each census tract. The map can be viewed at the following link. [https://phl-
9 water.maps.arcgis.com/apps/CompareAnalysis/index.html?appid=55a32a29024c4308917
10 4c2c5c15f9311](https://phl-water.maps.arcgis.com/apps/CompareAnalysis/index.html?appid=55a32a29024c43089174c2c5c15f9311)

11
12 **RESPONSE PROVIDED BY:** Philadelphia Water Department
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-12.** PLEASE DESCRIBE HOW PWD INFORMS SUBCONTRACTORS AND
2 EXTERNAL VENDORS OF THE LANGUAGE NEEDS OF PWD
3 CUSTOMERS.
4

5 **RESPONSE:**

6 PWD works on a case-by-case basis with contractors or subcontractors to understand what
7 communications will be necessary for their work and what language needs should be
8 anticipated based on the area of the city they will be working in.
9

10 **RESPONSE PROVIDED BY:** Philadelphia Water Department
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-13.** FOR EACH CALENDAR YEAR SINCE 2017, PLEASE PROVIDE THE
2 NUMBER OF TAP APPLICATIONS APPROVED FOR LIMITED ENGLISH
3 PROFICIENCY (LEP) OR ENGLISH AS A SECOND LANGUAGE (ESL)
4 CUSTOMERS.

5
6 **RESPONSE:**

7 The following table shows the number of non-English customer assistance applications that
8 were approved for TAP in each calendar year:

9
10

Year	Applications Approved for TAP
2017	24
2018	148
2019	153
2020	70

11
12
13
14

15
16 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-14.** FOR EACH CALENDAR YEAR SINCE 2017, PLEASE PROVIDE THE
2 TOTAL NUMBER OF TAP APPLICATIONS SUBMITTED IN A LANGUAGE
3 OTHER THAN ENGLISH.
4

5 **RESPONSE:**

6 The following table shows the number of non-English customer assistance applications
7 that were submitted in each calendar year:
8

Year	Applications Submitted
2017	89
2018	173
2019	281
2020	126

9
10
11
12
13
14 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-15.** FOR EACH CALENDAR YEAR SINCE 2017, PLEASE STATE THE NUMBER
2 OF TAP ACCOUNTS THAT PWD HAS DETERMINED TO BE HIGH USAGE
3 ACCOUNTS.
4

5 **RESPONSE:**

6 The City/PWD/WRB does not categorize accounts as “high usage.” Rather, each month,
7 up to 4,000 TAP participant accounts with the highest usage (average of three months, and
8 only actual usage, not estimates) are provided to the LICAP program administrator.
9 Accounts are only included in the monthly list if they have not been provided previously.
10

Year	Count of Accounts
2017	0
2018	8,255
2019	10,501
2020	2,199

11
12
13
14
15
16
17 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Raftelis Financial
18 Consultants, Inc.
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-16.** FOR EACH CALENDAR YEAR SINCE 2017, PLEASE STATE THE NUMBER
2 OF TAP ACCOUNTS THAT PWD HAS DETERMINED TO BE ELIGIBLE
3 FOR SERVICES THROUGH THE LOW INCOME CONSERVATION
4 ASSISTANCE PROGRAM (LICAP).

5
6 **RESPONSE:**

7 Customers enrolled in TAP are eligible for LICAP. The program administrator, CMC
8 Energy Services, contacts customers to request their participation on accounts provided as
9 described in the response to PA-XI-15 above.

10
11 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Raftelis Financial
12 Consultants, Inc.

1 **PA-XI-17.** FOR EACH CALENDAR YEAR SINCE 2017, PLEASE STATE THE NUMBER
2 OF TAP ACCOUNTS THAT HAVE RECEIVED MEASURES OTHER THAN
3 AN AUDIT THROUGH LICAP.
4

5 **RESPONSE:**

6 There is no report responsive to this request. Conservation measures are offered to every
7 customer who completes an audit. Although rare, customers can refuse any direct install
8 measures or follow up work. In these cases, customers are provided an educational leave
9 behind and referrals to other assistance programs for which they may qualify.
10

11 **RESPONSE PROVIDED BY:** Philadelphia Water Department
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-18.** FOR EACH CALENDAR YEAR SINCE 2017, PLEASE STATE THE NUMBER
2 OF TAP ACCOUNTS THAT WERE REFERRED TO LICAP BUT WERE
3 DETERMINED TO HAVE PLUMBING NEEDS NOT COVERED BY THE
4 LICAP PROGRAM.

5
6 **RESPONSE:**

7 There is no report responsive to this request. Customers with plumbing needs that are
8 beyond the scope of the LICAP program are provided with referral information to other
9 state and utility funded assistance programs.

10
11 **RESPONSE PROVIDED BY:** Philadelphia Water Department

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-19.** PLEASE PROVIDE A COPY OF ALL REPORTS PREPARED SINCE 2017
2 DESCRIBING THE PERFORMANCE OF LICAP AND SAVINGS
3 GENERATED BY LICAP.
4

5 **RESPONSE:**

6 Please see response attachment PA-XI-19.pdf.
7

8 **RESPONSE PROVIDED BY:** Philadelphia Water Department
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-20.** PLEASE STATE THE TOTAL NUMBER OF HELP LOAN APPLICATIONS
2 THAT WERE APPROVED IN 2019.

3

4 **RESPONSE:**

5 In FY 2019 Plumbing Repairs completed 529 water service repairs; 782 sewer related
6 repairs; and replaced 56 lead water services. For a total of 1367 repairs and approved
7 HELP applicants.

8

9 **RESPONSE PROVIDED BY:** Philadelphia Water Department

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 **PA-XI-21.** OF THE HELP LOANS THAT WERE APPROVED IN 2019, HOW MANY
2 APPLICANTS RECEIVED AN INITIAL ESTIMATED LOAN TERM THAT
3 WAS SUBSEQUENTLY INCREASED VIA A CHANGE ORDER.
4

5 **RESPONSE:**

6 As reflected in response attachment PA-XI-30, the total amount of HELP loans in FY
7 2019 that were subsequently increased via a change order was 310.
8

9 **RESPONSE PROVIDED BY:** Philadelphia Water Department
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-22.** PLEASE STATE THE NUMBER OF HELP LOAN APPLICATIONS THAT
2 WERE APPROVED IN 2020.

3

4 **RESPONSE:**

5 In FY 2020 Plumbing Repairs completed 395 water service repairs; 533 sewer related
6 repairs; and replaced 31 lead water services. For a total of 959 repairs and approved HELP
7 applicants.

8

9 **RESPONSE PROVIDED BY:** Philadelphia Water Department

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 **PA-XI-23.** OF THE HELP LOANS THAT WERE APPROVED IN 2020, HOW MANY
2 APPLICANTS RECEIVED AN INITIAL ESTIMATED LOAN TERM THAT
3 WAS SUBSEQUENTLY INCREASED VIA A CHANGE ORDER.
4

5 **RESPONSE:**

6 As reflected in response attachment PA-XI-30, the total amount of HELP loans in FY
7 2020 that were subsequently increased via a change order was 181.
8

9 **RESPONSE PROVIDED BY:** Philadelphia Water Department
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-24.** PLEASE PROVIDE THE NAMES OF ALL HELP LOAN
2 SUBCONTRACTORS.
3

4 **RESPONSE:**

5 Bart Emanuel Plumbing; Best Choice Plumbing; Burke Plumbing; Buzz Duzz Plumbing;
6 John Ciervo Plumbing; Clements Brothers Plumbing; Coffelt Plumbing; Daniels Inc;
7 DMC Environmental; Edward Hughes & Son Plumbing; Jack Edmondson Plumbing;
8 Excel Plumbing; Guaranteed Plumbing; In-A-Flash Plumbing; Rich Lepore Plumbing;
9 Mr.D's Plumbing; Reliable Plumbing.
10

11 **RESPONSE PROVIDED BY:** Philadelphia Water Department
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-25.** PLEASE STATE THE NUMBER OF ACTIVE HELP LOAN AGREEMENTS.
2

3 **RESPONSE:**

4 There are 5,388 active HELP loans as of February 28, 2021.
5

6 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia Water
7 Department
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-26.** PLEASE STATE THE NUMBER OF PARTICIPANTS ENROLLED IN THE
2 TIERED HELP PROGRAM SET FORTH IN PWD REGULATION 200.6.

3
4 **RESPONSE:**

5 There are 1,165 participants enrolled in the tiered HELP program as of February 28, 2021.
6

7 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia Water
8 Department

1 **PA-XI-27.** PLEASE STATE THE NUMBER OF PARTICIPANTS ENROLLED IN THE
2 TIERED HELP PROGRAM WHO ARE ENROLLED IN A 60 MONTH
3 PAYMENT AGREEMENT.
4

5 **RESPONSE:**

6 There are 950 participants enrolled in the tiered HELP program who are enrolled in a sixty
7 (60) month payment agreement as of February 28, 2021.
8

9 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia Water
10 Department
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-28.** PLEASE STATE THE NUMBER OF PARTICIPANTS ENROLLED IN THE
2 TIERED HELP PROGRAM WHO ARE ENROLLED IN A 120 MONTH
3 PAYMENT AGREEMENT.
4

5 **RESPONSE:**

6 There are 20 participants enrolled in the tiered HELP program who are enrolled in a one-
7 hundred and twenty (120) month payment agreement as of February 28, 2021.
8

9 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia Water
10 Department
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-29.** PLEASE STATE THE NUMBER OF PARTICIPANTS ENROLLED IN THE
2 TIERED HELP PROGRAM WHO ARE ENROLLED IN A 180 MONTH
3 PAYMENT AGREEMENT.
4

5 **RESPONSE:**

6 There are 195 participants enrolled in the tiered HELP program who are enrolled in a one-
7 hundred and eighty (180) month payment agreement as of February 28, 2021.
8

9 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Philadelphia Water
10 Department
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1 **PA-XI-30.** FOR CALENDAR YEARS 2018-2020, PLEASE PROVIDE THE FOLLOWING:

2 A. THE NUMBER OF HELP LOANS APPROVED FOR LATERAL REPAIRS OR
3 REPLACEMENTS;

4 B. THE NUMBER OF HELP LOANS APPROVED FOR SLANT REPAIRS OR
5 REPLACEMENTS;

6 C. THE NUMBER OF HELP LOANS APPROVED FOR VENT COVER REPAIRS
7 OR REPLACEMENTS;

8 D. THE NUMBER OF HELP LOANS APPROVED FOR CURB TRAP REPAIRS
9 OR REPLACEMENTS;

10 E. THE NUMBER OF HELP LOANS APPROVED FOR MAIN HOUSE DRAIN
11 REPAIRS OR REPLACEMENTS;

12 F. THE NUMBER OF HELP LOANS APPROVED FOR FERRULE REPAIRS OR
13 REPLACEMENTS;

14 G. THE NUMBER OF HELP LOANS APPROVED FOR WATER SERVICE PIPE
15 REPAIRS OR REPLACEMENTS;

16 H. THE NUMBER OF HELP LOANS APPROVED FOR WATER SUPPLY PIPE
17 REPAIRS OR REPLACEMENTS;

18 I. THE NUMBER OF HELP LOANS APPROVED FOR CURB STOP REPAIRS
19 OR REPLACEMENTS;

20 J. THE NUMBER OF HELP LOANS APPROVED FOR CURB STOP BOX
21 REPAIRS OR REPLACEMENTS;

22 K. THE NUMBER OF HELP LOANS APPROVED FOR SUPPLY VALVE
23 REPAIRS OR REPLACEMENTS;

24 L. THE NUMBER OF HELP LOANS APPROVED FOR WATER METER
25 REPAIRS OR REPLACEMENTS;

26 M. THE NUMBER OF HELP LOANS APPROVED FOR LEAD SERVICE LINE
27 REPLACEMENTS.
28

1 **RESPONSE:**

2 Please see response attachment PA-XI-30.xlsx.

3

4 **RESPONSE PROVIDED BY:** Philadelphia Water Department

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 **PA-XI-31.** PLEASE DESCRIBE ANY BARRIERS TO PWD PROVIDING A
2 DOWNLOADABLE PDF OF THE TAP APPLICATION ON ITS WEBSITE
3 WITHOUT REQUIRING AN APPLICANT TO LOGIN OR PROVIDE AN
4 ACCESS CODE TO ACCESS THE APPLICATION.

5
6 **RESPONSE:**

7 An access code is used to generate a bar code specifically reflecting the customer of
8 record at the property. Importantly, the process is designed so that shut-off protections are
9 automatically provided to the customer during the customer's application process. The
10 ordinance that created TAP requires robust reporting. WRB's reporting mechanisms all
11 depend upon the bar code information. A downloadable PDF application without a unique
12 bar code could not ensure proper reporting, nor could customers that used it be provided
13 with automated shut-off protection. Customers are able to download a sample application
14 from PWD's website if they would like to view the application or instructions and to
15 prepare application materials.

16
17 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PA-XI-32. PLEASE PROVIDE A COPY OF ALL TRAINING MANUALS USED TO TRAIN PWD AND WRB STAFF ON COMPLIANCE WITH THE PROVISIONS OF USTRA.

RESPONSE:

Please refer to response attachment PA-II-18 USTRA Training Documents.

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PA-XI-33. REFERENCE PWD RESPONSE TO PA II-8: PLEASE CONFIRM OR DENY WHETHER PWD NOTIFIES THE PHILADELPHIA DEPARTMENT OF LICENSES AND INSPECTIONS PRIOR TO THE DISCONTINUANCE OF SERVICE TO A LANDLORD RATEPAYER FOR NONPAYMENT, AS REQUIRED BY 68 P.S. 399.3(A)(2).

RESPONSE:

PWD is not aware of these communications having happened, however a process is now in place to comply with all aspects of 68 P.S. 399.3(A)(2).

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PA-XI-34. REFERENCE PWD RESPONSE TO PA II-8: PLEASE CONFIRM OR DENY WHETHER PWD NOTIFIES THE PHILADELPHIA DEPARTMENT OF PUBLIC HEALTH PRIOR TO THE DISCONTINUANCE OF SERVICE TO A LANDLORD RATEPAYER FOR NONPAYMENT, AS REQUIRED BY 68 P.S. 399.3(A)(2).

RESPONSE:

PWD is not aware of these communications having happened, however a process is now in place to comply with all aspects of 68 P.S. 399.3(A)(2).

RESPONSE PROVIDED BY: Susan M. Crosby, Water Revenue Bureau

1 **PA-XI-35.** PLEASE PROVIDE BY MONTH, FOR JULY 2019 TO PRESENT, THE
2 NUMBER OF ACTIVE TAP PARTICIPANTS WHO REACHED 24 MONTHS
3 OF TAP PARTICIPATION IN THAT MONTH. FOR EXAMPLE, IF
4 SOMEONE NEWLY ENROLLED IN TAP IN SEPTEMBER 2017, THEIR 24TH
5 MONTH OF PARTICIPATION WOULD BE AUGUST 2019. THIS QUESTION
6 ASKS FOR THE COUNT OF ACTIVE TAP PARTICIPANTS IN EACH
7 MONTH WHO REACHED THEIR 24TH MONTH OF TAP PARTICIPATION
8 IN THAT MONTH.

9
10 **RESPONSE:**

11 The following table shows the number of TAP participants who received their 24th TAP
12 bill in a given month. These results do not require that that 24 months be consecutive.

13
14

YEAR	MONTH	ACCOUNTS
2019	7	441
2019	8	347
2019	9	397
2019	10	393
2019	11	663
2019	12	722
2020	1	799
2020	2	579
2020	3	699
2020	4	687
2020	5	962
2020	6	1,000
2020	7	868
2020	8	677
2020	9	521
2020	10	436
2020	11	268
2020	12	336

15
16
17
18
19
20
21
22
23
24
25
26

27
28 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-XI-36.** REFERENCE PWD RESPONSE TO PA-VIII-25, WHICH STATES AS
2 FOLLOWS: "CUSTOMER ACCOUNT PENALTIES ARE TRACKED
3 SEPARATELY IN THE WATER BILLING SYSTEM BY A SPECIFIC CODE
4 THAT IDENTIFIES THEM AS PENALTIES. THIS CODE ALLOWS THE
5 ARREARAGE FORGIVENESS PROCESSES TO CLEARLY IDENTIFY
6 PENALTY AND NON-PENALTY DEBT. THE PENALTY FORGIVENESS
7 PROGRAM WAS, IN FACT, IMPLEMENTED EARLIER THAN THE
8 PRINCIPAL FORGIVENESS PROGRAM. PENALTY FORGIVENESS WAS
9 IMPLEMENTED IN JUNE 2019 AND PRINCIPAL FORGIVENESS WAS
10 IMPLEMENTED STARTING IN SEPTEMBER 2020." PLEASE RESPOND TO
11 THE FOLLOWING:

- 12 A. PLEASE CONFIRM WHETHER JUNE 2019 IS A TYPO AND WHETHER THE
13 PRINCIPAL FORGIVENESS PROGRAM STARTED ON AN EARLIER
14 DATE.
- 15 B. WHEN PWD SAYS "PENALTY FORGIVENESS WAS IMPLEMENTED IN
16 JUNE 2019," DOES THAT MEAN THAT JUNE 2019 COULD BE "MONTH
17 24" FOR PURPOSES OF EARNING FORGIVENESS, OR DOES THAT MEAN
18 THAT JUNE 2019 WAS "MONTH 1" FOR PURPOSES OF EARNING
19 FORGIVENESS?
- 20 C. WHEN PWD SAYS "PRINCIPAL FORGIVENESS WAS IMPLEMENTED
21 STARTING IN SEPTEMBER 2020," DOES THAT MEAN THAT SEPTEMBER
22 2020 COULD BE "MONTH 24" FOR PURPOSES OF EARNING
23 FORGIVENESS, OR DOES THAT MEAN THAT SEPTEMBER
24 2020 WAS "MONTH 1" FOR PURPOSES OF EARNING FORGIVENESS?
25
26
27
28

1 **RESPONSE:**

- 2 A. The Penalty Forgiveness program went live with TAP in July 2017. The first month a
3 participant would have been eligible, assuming all payments were made timely, was
4 June 2019. The Principal Forgiveness Program began in September 2020.
5 B. June 2019 is month twenty-four (24) for purposes of earning penalty forgiveness.
6 C. September 2020 is month one (1) for purposes of principal forgiveness.

7
8 **RESPONSE PROVIDED BY:** Susan M. Crosby, Water Revenue Bureau and Raftelis Financial
9 Consultants, Inc.

1 **PA-XI-37.** REFERENCE PWD INFORMAL DISCOVERY RESPONSE TO CLS DATED
2 FEBRUARY 19, 2021. PLEASE PROVIDE A COPY OF THE HEAT MAPS
3 THAT WERE CREATED BY PWD TO SHOW THE CONCENTRATION OF
4 PROPERTIES ELIGIBLE FOR SHUT-OFF, AS OF APRIL 30, 2017. PLEASE
5 PROVIDE THE UNDERLYING DATA THAT WAS USED TO CREATE THE
6 HEAT MAPS IN ELECTRONIC FORMAT WITH THE FORMULAE INTACT.

7

8 **RESPONSE:**

9 Please see response attachments PA-XI-37.pdf and PA-XI-37 Heat Map Data.xlsx.

10

11 **RESPONSE PROVIDED BY:** Philadelphia Water Department

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28