

BEFORE THE  
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater and Stormwater Rates and Charges	Fiscal Years 2022-2023
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**PHILADELPHIA WATER DEPARTMENT'S  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
SET I (Colton)**

Interrogatories and Requests for Production

1. Reference PA Statement 3, pages 80 to 86 regarding "Race and TAP Denials":  
Please identify all of the facts, data and documents on which Mr. Colton relies or intends to rely upon to support his analysis on racial impacts.

**Response:** See attachment 1.

**By:** Roger D. Colton

2. Reference PA Statement 3, Appendix B: Please identify all of the facts, data and documents on which Mr. Colton relies or intends to rely upon to support his analysis in the white paper attached as Appendix B.

**Response.** See Attachments 1 – 17.

**By:** Roger D. Colton

3. Reference PA Statement 3, Part 4 (pages 80-86). Provide the Zip Code Tabulation Areas mapped to the Zip Codes that were used in this section's analysis.

**Response:** See response to Question 1.

**By:** Roger D. Colton

4. Reference PA Statement 3, Part 4 (pages 80-86). Provide the entire data set, with formulas intact, used for the rank-ordering of each Zip Code from the lowest number of TAP denials to the highest number of TAP denials.

**Response:** See response to Question 1.

**By:** Roger D. Colton

5. With respect to your response to Question 4 above, provide an explanation of how this data set maps to Table 12, Table 13, the table on page 85, and Schedule RDC-1.

**Response:** See response to Question 1.

**By:** Roger D. Colton

6. Reference PA Statement 3, Part 4 (pages 80-86). Provide the entire data set, with formulas intact, used for the rank-ordering of each Zip Code by percentage of population in each Zip Code that is reported to be comprised of Black persons by the Census Bureau.

**Response:** See response to Question 1.

**By:** Roger D. Colton

7. With respect to your response to Question 6 above, provide an explanation of how this data set maps to Table 12, Table 13, the table on page 85, and Schedule RDC-1.

**Response:** See response to Question 1.

**By:** Roger D. Colton

8. Reference PA Statement 3, Part 4 (pages 80-86). Provide a link to the **specific** data used from the Census Bureau that was utilized for the rank-ordering of each

Zip Code by percentage of population in each Zip Code that is reported to be comprised of Black persons by the Census Bureau.

**Response:** See response to Question 1.

**By:** Roger D. Colton

9. Reference PA Statement 3, Part 2 (pages 32-34). Please provide the supporting data and calculation for the statement that there have been “36,564 low-income PWD customers newly enrolled in TAP” between July 2017 and December 2020.

**Response:** In response to Public Advocate discovery (Set III, #11), PWD provided data described as follows:

**(a) New TAP Enrollees**

The number of applications approved for a TAP plan through the new application workflow and reporting software Customer Application Management Program (CAMP). This number includes all applications that were approved for TAP, regardless of the application’s current status. If an applicant was approved for a plan in CAMP more than once, the most recent approval was used.”

Colton summed that data provided by PWD.

**By:** Roger D. Colton

10. Reference PA Statement 3, Part 2 (pages 32-34). Please provide the supporting data and calculations for the statement that TAP participants have \$109,603,111 in pre-program arrears.

**Response:** In response to Public Advocate discovery (Set III, #11), PWD provided data described as follows:

**(c) Number of TAP New Enrollees Having Preprogram Arrears at the Time of Enrollment**

The number of applications approved for a TAP plan as described in part (a) above with arrears, defined as account balance, at the time of approval greater than \$0, as recorded from Basis2 at the time of enrollment. Note that this excludes any balances that were in dispute or bankruptcy at the time of approval.

**(d) Aggregate Dollars of Preprogram Arrears for TAP New Enrollees at the Time of Enrollment**

The total dollar amount of arrears, defined as account balance, as defined in part (c) above. This excludes any balances that were in dispute or bankruptcy at the time of approval.

Colton summed the data provided by PWD.

**By:** Roger D. Colton

11. Reference PA Statement 3, Part 2 (pages 32-34). Please define “non-TAP low-income customers” and “low-income TAP non-participants.”

**Response:** The cited phrases were used consistent with the definitions provided by PWD (“TAP customers outside TAP enrollment”). The Public Advocate asked PWD and PWD’s response was as follows:

**PA-III-33. IN THE COLLECTABILITY STUDIES PREPARED BY OR FOR PWD, PLEASE PROVIDE A DETAILED EXPLANATION OF WHAT CUSTOMERS ARE INCLUDED IN THE POPULATION LABELLED ‘TAP CUSTOMERS OUTSIDE OF TAP ENROLLMENT.’**

**RESPONSE:**

In the Low Income Billing & Payments report, provided as Schedule RFC-9 within PWD Statement No. 6., “TAP Customers Outside of TAP Enrollment” lines summarize billings within each fiscal year and payments within relevant timeframes for customers who at another point in time (either prior to or after the billings included) are TAP participants. These records only include their billings and payments for these customers for time periods when they are not participating in TAP.”

**By:** Roger D. Colton

12. Reference PA Statement 3, Part 2 (pages 32-34). Please provide the supporting data and calculations for the statements regarding the proportions of billed for TAP, non-TAP low-income, and low-income TAP non-participants.

**Response:** See, response to Question 2.

**By:** Roger D. Colton