

**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
Related Charges**

**Fiscal Years 2024 – 2025
Rates and Charges to Become
Effective September 1, 2023
and September 1, 2024**

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**PUBLIC ADVOCATES DISCOVERY REQUESTS
&
REQUESTS FOR PRODUCTION OF DOCUMENTS**

Set II

- PA-II-1. Please provide a copy of all studies or other written documents prepared by or on behalf of the City of Philadelphia, or used by the City of Philadelphia, including but not limited to PWD, for the years 2015 through 2024, demonstrating that the City as a whole, or some sub-component of the City, is:
- a. A low-income community for purposes of either Pennsylvania's Clean Water State Revolving Fund (CWSRF) or Pennsylvania's Drinking Water State Revolving Fund (DWSRF);
 - b. Is a "disadvantaged" community for purposes of either Pennsylvania's CWSRF or Pennsylvania's DWSRF.
- PA-II-2. Please provide a copy of all applications submitted by or on behalf of the City of Philadelphia, including but not limited to PWD, for the years 2015 through 2024, for:
- a. A loan from Pennsylvania's CWSRF;
 - b. A loan from Pennsylvania's DWSRF;
 - c. A loan with "additional subsidization" from Pennsylvania's CWSRF; and
 - d. A loan with "additional subsidization" from Pennsylvania's DWSRF.
- PA-II-3. Please provide a copy of all written decisions from the Commonwealth of Pennsylvania for the years 2015 through 2024:
- a. regarding an application by Philadelphia for a loan from Pennsylvania's CWSRF;
 - b. regarding an application by Philadelphia for a loan from Pennsylvania's DWSRF;
 - c. regarding an application by Philadelphia for "additional subsidization" from Pennsylvania's CWSRF;
 - d. regarding an application by Philadelphia for "additional subsidization" from Pennsylvania's DWSRF.

PA-II-4. Please provide a copy of all applications submitted by or on behalf of the City of Philadelphia, including but not limited to PWD, for the years 2015 through 2024, for specific funding:

- a. For Lead Service Line Replacement;
- b. For Lead Service Line Replacement with additional subsidization;
- c. For treatment of emerging contaminants;
- d. For treatment of emerging contaminants with additional subsidization.

PA-II-5. For the years 2015 through 2024, please provide a copy of all written decisions from the Commonwealth of Pennsylvania regarding an application by Philadelphia for funding:

- a. For Lead Service Line Replacement;
- b. For Lead Service Line Replacement with additional subsidization;
- c. For treatment of emerging contaminants;
- d. For treatment of emerging contaminants with additional subsidization.

PA-II-6. Please provide a copy of all written documents prepared by or on behalf of the City of Philadelphia, including but not limited to PWD, for the years 2015 through 2024, setting an assessment of the status of the City, or some sub-component of the City, as a low-income or disadvantaged community for purposes of either the Pennsylvania CWSRF or DWSRF, which assessment is based in whole or in part on:

- a. The Environmental Protection Agency's EJ screening tool;
- b. The Council on Environmental Quality's Climate and Economic Justice screening tool;
- c. The Center for Disease Control's Social Vulnerability Index.

PA-II-7. Please provide a complete list of any use by the City of Philadelphia, including PWD, of "additional subsidization" from the Commonwealth of Pennsylvania's CWSRF or DWSRF during the state fiscal years 2015 through 2024. Distinguish use of funds from Pennsylvania's regular capitalization grant, from the IJJA, or from some other source (specifying what the "other" is).

PA-II-8. By year for the years 2015 through 2024, please provide a complete list of loans received by the City of Philadelphia, including but limited to PWD, from the CWSRF and/or DWSRF disaggregated by the term in years of the loan. Specify the capital projects which the loan was received to fund.

PA-II-9. Please provide a copy of all documents provided by or on behalf of the City of Philadelphia, including but not limited to PWD, to the EPA's National Information Management System (NIMS) for the years 2015 through 2024.

PA-II-10. For the years 2015 through 2024, please provide a copy of all documents provided by or on behalf of the City of Philadelphia, including but not limited to PWD, to the Commonwealth of Pennsylvania, intended to inform Pennsylvania's development of its annual Intended Use Plan (IUP) for the CWSRF and/or DWSRF.

PA-II-11. Please provide the month and year in which the City of Philadelphia's "Raise Your Hand" program was first used to restrict the use of service disconnections for nonpayment of PWD bills.

PA-II-12. By month for the twelve months prior to the month in which the Raise Your Hand program was first used through the most current month available, please provide the following:

- a. The number of Raise Your Hand customers;
- b. The number of nonpayment disconnect notices issued to Raise Your Hand customers;
- c. The number of nonpayment disconnections to Raise Your Hand customers;
- d. The number of reconnections after a disconnection to Raise Your Hand customers;
- e. The number of bills issued to Raise Your Hand customers;
- f. The number of payments received from (or on behalf of) Raise Your Hand customers;
- g. The dollars of bills for current service issued to Raise Your Hand customers;
- h. The dollars of payments received from (or on behalf of) Raise Your Hand customers;
- i. The number of Raise Your Hand customers charged a late payment charge;
- j. The dollars of late payment charges billed to Raise Your Hand customers.
- k. The total number of Raise Your Hand customers with arrears;
- l. The total dollars of arrears billed to Raise Your Hand customers.

PA-II-13. Please provide the same information as requested in the immediately preceding data request (PA-II-12), except limited to residential customers who were not identified as Raise Your Hand customers.

PA-II-14. Please indicate whether the total for PWD for each response to the questions in PA-II-12 is equal to the data provided in response to PA-II-12 plus the data provided in response to PA-II-13. If not, please provide the total for residential customers for the information requested in PA-II-12.

PA-II-15. By month for the twelve months prior to the month in which the Raise Your Hand program was first used through the most current month available, please provide the following:

- a. The number of Staff positions devoted to performing residential nonpayment disconnections;
- b. The dollars of salary and benefits paid to staff positions devoted to performing residential nonpayment disconnections;
- c. The dollars of overhead associated with staff positions devoted to performing residential nonpayment disconnections;
- d. The dollars of administrative and general expenses associated with staff positions devoted to performing residential nonpayment disconnections.

PA-II-16. By month for the twelve months prior to the month in which the Raise Your Hand program was first used through the most current month available, please provide the number of residential customers whose service, in the absence of having been identified as a Raise Your Hand customer, would have been disconnected for nonpayment.

PA-II-17. By month for the twelve months prior to the month in which the Raise Your Hand program was first used through the most current month available, please provide the following:

- a. The residential dollars written off as uncollectible;
- b. The number of residential accounts written off as uncollectible.

PA-II-18. Please provide a complete copy of any and all internal PWD policies regarding the percentage of bill, or dollar amount, that will be reserved for write-offs or uncollectibles based on:

- a. The size of arrears in dollars;
- b. The age of arrears in months.

PA-II-19. Please provide the average number of residential disconnections for nonpayment per day per individual field personnel doing disconnections for nonpayment:

- a. During the 12 months prior to adoption of the Raise Your Hand program.
- b. During the time period after adoption of the Raise Your Hand program.

PA-II-20. Please explain and describe in detail the job description for each employee whose reasonably expected typical duties would include the process of disconnecting service for nonpayment. Please include any documents, analyses or reports that address, concern or refer to the job description.

PA-II-21. For the 12 months prior to adoption of the Raise Your Hand program, as well as for the time period subsequent to adoption of Raise Your Hand, for a typical field staff person that performs residential disconnections for nonpayment, please provide:

- a. The percent of a typical day spent on performing disconnections for nonpayment;
- b. The percent of a typical week spent on performing disconnections for nonpayment;
- c. The percent of a typical month spent on performing disconnections for nonpayment.

If this data differs by month or season, indicate the differences and then identify the month or season to which the difference applies.

PA-II-22. By month, for each month since the adoption of the Raise Your Hand program, please provide the number of budgeted Company job positions whose job description would or may include the task of disconnecting residential service for nonpayment. If a count of budgeted job positions is available on some periodic basis other than by month, identify the count by the most frequent period available (*e.g.*, provide annual data, but only if a count on something more frequent than annually is not available).

PA-II-23. By month, for each month since the adoption of the Raise Your Hand program, please provide the number of actual Company job positions whose job description would or may include the task of disconnecting residential service for nonpayment. If a count of job positions is available on some periodic basis other than by month, identify the count by the most frequent period available (*e.g.*, provide annual data, but only if a count on something more frequent than annually is not available).

PA-II-24. Please provide a copy of any and all labor agreements that include any reference to the disconnection of service for nonpayment by company personnel.

PA-II-25. By month, for each month since the month in which Raise Your Hand was first implemented, of the residential service disconnection notices issued, please provide the number of accounts that received a service disconnection notice in:

- a. 6 or more consecutive months without a disconnection of service;
- b. 5 or more consecutive months without a disconnection of service;
- c. 4 or more consecutive months without a disconnection of service;
- d. 3 or more consecutive months without a disconnection of service.