

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-25

Dated: February 2025

1 **PA-II-1.** PLEASE PROVIDE A COPY OF ALL STUDIES OR OTHER WRITTEN
2 DOCUMENTS PREPARED BY OR ON BEHALF OF THE CITY OF
3 PHILADELPHIA, OR USED BY THE CITY OF PHILADELPHIA,
4 INCLUDING BUT NOT LIMITED TO PWD, FOR THE YEARS 2015
5 THROUGH 2024, DEMONSTRATING THAT THE CITY AS A WHOLE, OR
6 SOME SUB-COMPONENT OF THE CITY, IS:

- 7 A. LOW-INCOME COMMUNITY FOR PURPOSES OF EITHER
8 PENNSYLVANIA’S CLEAN WATER STATE REVOLVING FUND
9 (CWSRF) OR PENNSYLVANIA’S DRINKING WATER STATE
10 REVOLVING FUND (DWSRF);
11 B. IS A “DISADVANTAGED” COMMUNITY FOR PURPOSES OF
12 EITHER PENNSYLVANIA’S CWSRF OR PENNSYLVANIA’S
13 DWSRF.

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15 **RESPONSE:**

16 The Department has objected to this information request. PWD and the Advocate are
17 trying to resolve the pending discovery dispute.
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19 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-2.** PLEASE PROVIDE A COPY OF ALL APPLICATIONS SUBMITTED BY OR
2 ON BEHALF OF THE CITY OF PHILADELPHIA, INCLUDING BUT NOT
3 LIMITED TO PWD, FOR THE YEARS 2015 THROUGH 2024, FOR:

- 4 A. A LOAN FROM PENNSYLVANIA’S CWSRF;
5 B. A LOAN FROM PENNSYLVANIA’S DWSRF;
6 C. A LOAN WITH “ADDITIONAL SUBSIDIZATION” FROM
7 PENNSYLVANIA’S CWSRF; AND
8 D. A LOAN WITH “ADDITIONAL SUBSIDIZATION” FROM
9 PENNSYLVANIA’S DWSRF.

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11 **RESPONSE:**

12 The Department has objected to this information request. Subject to and without waiving
13 the pending objection, response attachment PA-II-2 is provided.

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15 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-3.** PLEASE PROVIDE A COPY OF ALL WRITTEN DECISIONS FROM THE
2 COMMONWEALTH OF PENNSYLVANIA FOR THE YEARS 2015
3 THROUGH 2024:

- 4 A. REGARDING AN APPLICATION BY PHILADELPHIA FOR A LOAN
5 FROM PENNSYLVANIA'S CWSRF;
6 B. REGARDING AN APPLICATION BY PHILADELPHIA FOR A LOAN
7 FROM PENNSYLVANIA'S DWSRF;
8 C. REGARDING AN APPLICATION BY PHILADELPHIA FOR
9 "ADDITIONAL SUBSIDIZATION" FROM PENNSYLVANIA'S
10 CWSRF;
11 D. REGARDING AN APPLICATION BY PHILADELPHIA FOR
12 "ADDITIONAL SUBSIDIZATION" FROM PENNSYLVANIA'S
13 DWSRF.

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15 **RESPONSE:**

16 The Department has objected to this information request. Subject to and without waiving
17 the pending objection, response attachment PA-II-3 is provided.

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19 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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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.

RESPONSE:

The Department has objected to this information request. Subject to and without waiving the pending objection, response attachment PA-II-4 is provided.

RESPONSE PROVIDED BY: Philadelphia Water Department

1 **PA-II-5.** FOR THE YEARS 2015 THROUGH 2024, PLEASE PROVIDE A COPY OF
2 ALL WRITTEN DECISIONS FROM THE COMMONWEALTH OF
3 PENNSYLVANIA REGARDING AN APPLICATION BY PHILADELPHIA
4 FOR FUNDING:

- 5 A. FOR LEAD SERVICE LINE REPLACEMENT;
6 B. FOR LEAD SERVICE LINE REPLACEMENT WITH ADDITIONAL
7 SUBSIDIZATION;
8 C. FOR TREATMENT OF EMERGING CONTAMINANTS;
9 D. FOR TREATMENT OF EMERGING CONTAMINANTS WITH
10 ADDITIONAL SUBSIDIZATION.

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14 **RESPONSE:**

15 The Department has objected to this information request. Subject to and without waiving
16 the pending objection, response attachment PA-II-5 is provided.

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18 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-6.** PLEASE PROVIDE A COPY OF ALL WRITTEN DOCUMENTS PREPARED
2 BY OR ON BEHALF OF THE CITY OF PHILADELPHIA, INCLUDING BUT
3 NOT LIMITED TO PWD, FOR THE YEARS 2015 THROUGH 2024, SETTING
4 AN ASSESSMENT OF THE STATUS OF THE CITY, OR SOME SUB-
5 COMPONENT OF THE CITY, AS A LOW-INCOME OR DISADVANTAGED
6 COMMUNITY FOR PURPOSES OF EITHER THE PENNSYLVANIA CWSRF
7 OR DWSRF, WHICH ASSESSMENT IS BASED IN WHOLE OR IN PART ON:
8 A. THE ENVIRONMENTAL PROTECTION AGENCY’S EJ SCREENING
9 TOOL;
10 B. THE COUNCIL ON ENVIRONMENTAL QUALITY’S CLIMATE AND
11 ECONOMIC JUSTICE SCREENING TOOL;
12 C. THE CENTER FOR DISEASE CONTROL’S SOCIAL
13 VULNERABILITY INDEX.

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15 **RESPONSE:**

16 The Department has objected to this information request. Subject to and without waiving
17 the pending objection, response attachment PA-II-6 is provided.

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19 Note: The Water Department uses the following tools for grants, not PennVEST
20 applications:

- 21 1. PA EnviroTool (PA DEP) - <https://gis.dep.pa.gov/PennEnviroScreen/>
- 22 2. Climate and Economic Justice Screening Tool (CEJST) -
23 <https://www.arcgis.com/home/item.html?id=b82df3b058204ccea64619efcd8065d2>
- 24 3. CDC Social Vulnerability Index –
25 <https://www.atsdr.cdc.gov/place-health/php/svi/svi-interactive-map.html>

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

1 **PA-II-7.** PLEASE PROVIDE A COMPLETE LIST OF ANY USE BY THE CITY OF
2 PHILADELPHIA, INCLUDING PWD, OF “ADDITIONAL SUBSIDIZATION”
3 FROM THE COMMONWEALTH OF PENNSYLVANIA’S CWSRF OR
4 DWSRF DURING THE STATE FISCAL YEARS 2015 THROUGH 2024.
5 DISTINGUISH USE OF FUNDS FROM PENNSYLVANIA’S REGULAR
6 CAPITALIZATION GRANT, FROM THE IIJA, OR FROM SOME OTHER
7 SOURCE (SPECIFYING WHAT THE “OTHER” IS).
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9 **RESPONSE:**

10 The Department has objected to this information request. Subject to and without waiving
11 the pending objection, response attachment PA-II-7 is provided.
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13 Please also note that PennVEST projects are fully subsidized via PennVest loans and
14 grants. There is no additional subsidization.
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16 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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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.

RESPONSE:

The Department has objected to this information request. Subject to and without waiving the pending objection, please refer to response attachment PA-II-7.

RESPONSE PROVIDED BY: Philadelphia Water Department

1 **PA-II-9.** PLEASE PROVIDE A COPY OF ALL DOCUMENTS PROVIDED BY OR ON
2 BEHALF OF THE CITY OF PHILADELPHIA, INCLUDING BUT NOT
3 LIMITED TO PWD, TO THE EPA'S NATIONAL INFORMATION
4 MANAGEMENT SYSTEM (NIMS) FOR THE YEARS 2015 THROUGH 2024.

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6 **RESPONSE:**

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8 The Department has objected to this information request. Subject to and without waiving
9 the pending objection, the following response is provided: PWD doesn't provide
10 documents directly to the EPA's NIMS. That information is provided by PennVEST to
11 EPA.

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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-10.** FOR THE YEARS 2015 THROUGH 2024, PLEASE PROVIDE A COPY OF
2 ALL DOCUMENTS PROVIDED BY OR ON BEHALF OF THE CITY OF
3 PHILADELPHIA, INCLUDING BUT NOT LIMITED TO PWD, TO THE
4 COMMONWEALTH OF PENNSYLVANIA, INTENDED TO INFORM
5 PENNSYLVANIA'S DEVELOPMENT OF ITS ANNUAL INTENDED USE
6 PLAN (IUP) FOR THE CWSRF AND/OR DWSRF.

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9 **RESPONSE:**

10 The Department has objected to this information request. PWD and the Advocate are
11 trying to resolve the pending discovery dispute.

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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-11.** PLEASE PROVIDE THE MONTH AND YEAR IN WHICH THE CITY OF
2 PHILADELPHIA’S “RAISE YOUR HAND” PROGRAM WAS FIRST USED
3 TO RESTRICT THE USE OF SERVICE DISCONNECTIONS FOR
4 NONPAYMENT OF PWD BILLS.

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7 **RESPONSE:**

8 The Department has objected to this information request. Subject to and without waiving
9 the pending objection, the following response is provided: The “Raise Your Hand”
10 program began in April 2023.

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12 **RESPONSE PROVIDED BY:** Water Revenue Bureau
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1 **PA-II-12.** BY MONTH FOR THE TWELVE MONTHS PRIOR TO THE MONTH IN
2 WHICH THE RAISE YOUR HAND PROGRAM WAS FIRST USED
3 THROUGH THE MOST CURRENT MONTH AVAILABLE, PLEASE
4 PROVIDE THE FOLLOWING:

- 5 A. THE NUMBER OF RAISE YOUR HAND CUSTOMERS;
6 B. THE NUMBER OF NONPAYMENT DISCONNECT NOTICES ISSUED
7 TO RAISE YOUR HAND CUSTOMERS;
8 C. THE NUMBER OF NONPAYMENT DISCONNECTIONS TO RAISE
9 YOUR HAND CUSTOMERS;
10 D. THE NUMBER OF RECONNECTIONS AFTER A DISCONNECTION
11 TO RAISE YOUR HAND CUSTOMERS;
12 E. THE NUMBER OF BILLS ISSUED TO RAISE YOUR HAND
13 CUSTOMERS;
14 F. THE NUMBER OF PAYMENTS RECEIVED FROM (OR ON BEHALF
15 OF) RAISE YOUR HAND CUSTOMERS;
16 G. THE DOLLARS OF BILLS FOR CURRENT SERVICE ISSUED TO
17 RAISE YOUR HAND CUSTOMERS;
18 H. THE DOLLARS OF PAYMENTS RECEIVED FROM (OR ON BEHALF
19 OF) RAISE YOUR HAND CUSTOMERS;
20 I. THE NUMBER OF RAISE YOUR HAND CUSTOMERS CHARGED A
21 LATE PAYMENT CHARGE;
22 J. THE DOLLARS OF LATE PAYMENT CHARGES BILLED TO RAISE
23 YOUR HAND CUSTOMERS.
24 K. THE TOTAL NUMBER OF RAISE YOUR HAND CUSTOMERS WITH
25 ARREARS;
26 L. THE TOTAL DOLLARS OF ARREARS BILLED TO RAISE YOUR
27 HAND CUSTOMERS.
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RESPONSE:

This information request was withdrawn by agreement with the Public Advocate.

RESPONSE PROVIDED BY: Philadelphia Water Department

1 **PA-II-13.** PLEASE PROVIDE THE SAME INFORMATION AS REQUESTED IN THE
2 IMMEDIATELY PRECEDING DATA REQUEST (PA-II-12), EXCEPT
3 LIMITED TO RESIDENTIAL CUSTOMERS WHO WERE NOT IDENTIFIED
4 AS RAISE YOUR HAND CUSTOMERS.
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6 **RESPONSE:**

7 This information request was withdrawn by agreement with the Public Advocate.
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10 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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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.

RESPONSE:

This information request was withdrawn by agreement with the Public Advocate.

RESPONSE PROVIDED BY: Philadelphia Water Department

1 **PA-II-15.** BY MONTH FOR THE TWELVE MONTHS PRIOR TO THE MONTH IN
2 WHICH THE RAISE YOUR HAND PROGRAM WAS FIRST USED
3 THROUGH THE MOST CURRENT MONTH AVAILABLE, PLEASE
4 PROVIDE THE FOLLOWING:

- 5 A. THE NUMBER OF STAFF POSITIONS DEVOTED TO PERFORMING
6 RESIDENTIAL NONPAYMENT DISCONNECTIONS;
7 B. THE DOLLARS OF SALARY AND BENEFITS PAID TO STAFF
8 POSITIONS DEVOTED TO PERFORMING RESIDENTIAL
9 NONPAYMENT DISCONNECTIONS;
10 C. THE DOLLARS OF OVERHEAD ASSOCIATED WITH STAFF
11 POSITIONS DEVOTED TO PERFORMING RESIDENTIAL
12 NONPAYMENT DISCONNECTIONS;
13 D. THE DOLLARS OF ADMINISTRATIVE AND GENERAL EXPENSES
14 ASSOCIATED WITH STAFF POSITIONS DEVOTED TO
15 PERFORMING RESIDENTIAL NONPAYMENT DISCONNECTIONS.
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17 **RESPONSE:**

18 This information request was withdrawn by agreement with the Public Advocate.
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20 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-16.** BY MONTH FOR THE TWELVE MONTHS PRIOR TO THE MONTH IN
2 WHICH THE RAISE YOUR HAND PROGRAM WAS FIRST USED
3 THROUGH THE MOST CURRENT MONTH AVAILABLE, PLEASE
4 PROVIDE THE NUMBER OF RESIDENTIAL CUSTOMERS WHOSE
5 SERVICE, IN THE ABSENCE OF HAVING BEEN IDENTIFIED AS A RAISE
6 YOUR HAND CUSTOMER, WOULD HAVE BEEN DISCONNECTED FOR
7 NONPAYMENT.
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9 **RESPONSE:**

10 This information request was withdrawn by agreement with the Public Advocate.
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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-17.** BY MONTH FOR THE TWELVE MONTHS PRIOR TO THE MONTH IN
2 WHICH THE RAISE YOUR HAND PROGRAM WAS FIRST USED
3 THROUGH THE MOST CURRENT MONTH AVAILABLE, PLEASE
4 PROVIDE THE FOLLOWING:

5 A. THE RESIDENTIAL DOLLARS WRITTEN OFF AS
6 UNCOLLECTIBLE;

7 B. THE NUMBER OF RESIDENTIAL ACCOUNTS WRITTEN OFF
8 AS UNCOLLECTIBLE.

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10 **RESPONSE:**

11 A. No residential dollars have been written off as uncollectible as a result of the “Raise Your
12 Hand” program.

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14 B. No residential accounts have been written off as uncollectible as a result of the “Raise
15 Your Hand” program.

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17 **RESPONSE PROVIDED BY:** Water Revenue Bureau
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1 **PA-II-18.** PLEASE PROVIDE A COMPLETE COPY OF ANY AND ALL INTERNAL
2 PWD POLICIES REGARDING THE PERCENTAGE OF BILL, OR DOLLAR
3 AMOUNT, THAT WILL BE RESERVED FOR WRITE-OFFS OR
4 UNCOLLECTIBLES BASED ON:

- 5 A. THE SIZE OF ARREARS IN DOLLARS;
6 B. THE AGE OF ARREARS IN MONTHS.

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8 **RESPONSE:**

9 The City is unable to provide an accurate response to this question due to its ambiguity
10 and needs further clarification as to the meaning of “the percentage of bill, or dollar
11 amount, that will be reserved for write-offs or uncollectibles.” Without waiver of
12 objection to this request, please see Phila. Code 19-1605(1), granting the City authority to
13 write off debt that has aged over 15 years.

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15 **RESPONSE PROVIDED BY:** Water Revenue Bureau
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1 **PA-II-19.** PLEASE PROVIDE THE AVERAGE NUMBER OF RESIDENTIAL
2 DISCONNECTIONS FOR NONPAYMENT PER DAY PER INDIVIDUAL
3 FIELD PERSONNEL DOING DISCONNECTIONS FOR NONPAYMENT:

4 A. DURING THE 12 MONTHS PRIOR TO ADOPTION OF THE
5 RAISE YOUR HAND PROGRAM.

6 B. DURING THE TIME PERIOD AFTER ADOPTION OF THE
7 RAISE YOUR HAND PROGRAM.

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9 **RESPONSE:**

10 This information request was withdrawn by agreement with the Public Advocate.
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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-20.** PLEASE EXPLAIN AND DESCRIBE IN DETAIL THE JOB DESCRIPTION
2 FOR EACH EMPLOYEE WHOSE REASONABLY EXPECTED TYPICAL
3 DUTIES WOULD INCLUDE THE PROCESS OF DISCONNECTING SERVICE
4 FOR NONPAYMENT. PLEASE INCLUDE ANY DOCUMENTS, ANALYSES
5 OR REPORTS THAT ADDRESS, CONCERN OR REFER TO THE JOB
6 DESCRIPTION.

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8 **RESPONSE:**

9 This information request was withdrawn by agreement with the Public Advocate.
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12 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-21.** FOR THE 12 MONTHS PRIOR TO ADOPTION OF THE RAISE YOUR HAND
2 PROGRAM, AS WELL AS FOR THE TIME PERIOD SUBSEQUENT TO
3 ADOPTION OF RAISE YOUR HAND, FOR A TYPICAL FIELD STAFF
4 PERSON THAT PERFORMS RESIDENTIAL DISCONNECTIONS FOR
5 NONPAYMENT, PLEASE PROVIDE:

- 6 A. THE PERCENT OF A TYPICAL DAY SPENT ON
7 PERFORMING DISCONNECTIONS FOR NONPAYMENT;
8 B. THE PERCENT OF A TYPICAL WEEK SPENT ON
9 PERFORMING DISCONNECTIONS FOR NONPAYMENT;
10 C. THE PERCENT OF A TYPICAL MONTH SPENT ON
11 PERFORMING DISCONNECTIONS FOR NONPAYMENT. IF
12 THIS DATA DIFFERS BY MONTH OR SEASON, INDICATE
13 DIFFERENCES AND THEN IDENTIFY THE MONTH OR
14 SEASON TO WHICH THE DIFFERENCE APPLIES.

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16 **RESPONSE:**

17 This information request was withdrawn by agreement with the Public Advocate.
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20 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-22.** BY MONTH, FOR EACH MONTH SINCE THE ADOPTION OF THE RAISE
2 YOUR HAND PROGRAM, PLEASE PROVIDE THE NUMBER OF
3 BUDGETED COMPANY JOB POSITIONS WHOSE JOB DESCRIPTION
4 WOULD OR MAY INCLUDE THE TASK OF DISCONNECTING
5 RESIDENTIAL SERVICE FOR NONPAYMENT. IF A COUNT OF
6 BUDGETED JOB POSITIONS IS AVAILABLE ON SOME PERIODIC BASIS
7 OTHER THAN BY MONTH, IDENTIFY THE COUNT BY THE MOST
8 FREQUENT PERIOD AVAILABLE (E.G., PROVIDE ANNUAL DATA, BUT
9 ONLY IF A COUNT ON SOMETHING MORE FREQUENT THAN
10 ANNUALLY IS NOT AVAILABLE).

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12 **RESPONSE:**

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14 The Department has objected to this information request. Subject to and without waiving
15 the pending objection, the following response is provided: The Philadelphia Water
16 Department Operations Division's has 51 Budgeted positions with a budget of \$4.3
17 Million. There has been no change in the number of budgeted positions.

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19 Delinquency & Restoration Unit staff were cross-trained during COVID to assist metering
20 install of AMI radios when the number of delinquency shutoffs is low.

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22 Staff also perform shut offs related to meter-non-compliance.

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24 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-23.** BY MONTH, FOR EACH MONTH SINCE THE ADOPTION OF THE RAISE
2 YOUR HAND PROGRAM, PLEASE PROVIDE THE NUMBER OF ACTUAL
3 COMPANY JOB POSITIONS WHOSE JOB DESCRIPTION WOULD OR MAY
4 INCLUDE THE TASK OF DISCONNECTING RESIDENTIAL SERVICE FOR
5 NONPAYMENT. IF A COUNT OF JOB POSITIONS IS AVAILABLE ON
6 SOME PERIODIC BASIS OTHER THAN BY MONTH, IDENTIFY THE
7 COUNT BY THE MOST FREQUENT PERIOD AVAILABLE (E.G., PROVIDE
8 ANNUAL DATA, BUT ONLY IF A COUNT ON SOMETHING MORE
9 FREQUENT THAN ANNUALLY IS NOT AVAILABLE).

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11 **RESPONSE:**

12 The Department has objected to this information request. PWD and the Advocate are
13 trying to resolve the pending discovery dispute.

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15 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-24.** PLEASE PROVIDE A COPY OF ANY AND ALL LABOR AGREEMENTS
2 THAT INCLUDE ANY REFERENCE TO THE DISCONNECTION OF
3 SERVICE FOR NONPAYMENT BY COMPANY PERSONNEL.
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5 **RESPONSE:**

6 The Department has objected to this information request. Subject to and without waiving
7 the pending objection, the following response is provided: After reasonable
8 investigation, PWD has identified no labor agreements that include any reference to
9 disconnection of service for non-payment by Department personnel.
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11 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-II-25.** BY MONTH, FOR EACH MONTH SINCE THE MONTH IN WHICH RAISE
2 YOUR HAND WAS FIRST IMPLEMENTED, OF THE RESIDENTIAL
3 SERVICE DISCONNECTION NOTICES ISSUED, PLEASE PROVIDE THE
4 NUMBER OF ACCOUNTS THAT RECEIVED A SERVICE DISCONNECTION
5 NOTICE IN:

- 6 A. 6 OR MORE CONSECUTIVE MONTHS WITHOUT A
7 DISCONNECTION OF SERVICE;
8 B. 5 OR MORE CONSECUTIVE MONTHS WITHOUT A
9 DISCONNECTION OF SERVICE;
10 C. 4 OR MORE CONSECUTIVE MONTHS WITHOUT A
11 DISCONNECTION OF SERVICE;
12 D. 3 OR MORE CONSECUTIVE MONTHS WITHOUT A
13 DISCONNECTION OF SERVICE

14 **RESPONSE:**

15 The Department has objected to this information request. PWD and the Advocate are
16 trying to resolve the pending discovery dispute.
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18 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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