

**SUPPLEMENTAL RESPONSE TO  
PUBLIC ADVOCATE'S INTERROGATORIES (SET II)  
AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
QUESTIONS 1, 10, 23, 25**

**Dated: March 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 Please see Supplemental Response Attachment PA-II-1.

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18 **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.

7 **RESPONSE:**

8 The Water Department does not have direct input into PennVest's IUP. Comments are  
9 made by partner organizations and not directly by the Water Department, nor are they  
10 prepared on the Water Department's behalf.

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12 **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 Please see response to PA-II-22. Job descriptions do not include references to  
13 disconnection of residential service for non-payment. Staff are cross trained and perform  
14 multiple tasks/assignments dependent on workload and need.

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16 **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  
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15 **RESPONSE:**

16 After reasonable investigation, the City is not in possession of documents responsive to  
17 this request.  
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20 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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