

**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 2019-2021
--	------------------------

**PHILADELPHIA WATER DEPARTMENT'S INTERROGATORIES AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
(SET I)**

Pursuant to the Hearing Officer's Procedural Rules for this Rate Proceeding, the Philadelphia Water Department ("Department" or "PWD") requests that the Public Advocate provide full and complete answers to the following interrogatories with seven calendar days of the service hereof.

Instructions and Definitions

1. Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession and control or custody of the Public Advocate or its consultants.
2. Each answer shall restate the question and identify the name and affiliation of the individual answering the interrogatory.
3. Copies of all answers shall be provided in PDF and/or XLS format via email.
4. Answers to these interrogatories and requests for production of documents shall be made in accordance with the Hearing Officer's Procedural Rules applicable to this rate proceeding.
5. Each answer in this set of interrogatories relates to the Public Advocate's TAP Rider Negotiation document, dated February 2, 2018 (PA TAP Rider Document);
6. "TAP" means the Tiered Assistance Program.
7. References in these interrogatories to "Average TAP Benefit," "TAP Offset," "Low Income Multiplier," "Average A/F Benefit," "Estimated TAP Usage," "Actual TAP Usage" and "Interest Rate" are made in connection with the PA TAP Rider Document and supporting workpapers.
8. Rate Period means each designated test period during FY 2019-2021, as set forth in the rate filing.

Interrogatories

- PWD-I-1. Please explain in detail how the Average TAP Benefit amount is to be determined for each rate period, and the sources of the information that you propose should be used for determining the Average TAP Benefit.
- PWD-I-2. Please explain in detail how the number of TAP participants will be determined for each Rate Period.

- PWD-I-3. Please explain the calculation of the TAP Offset percentage and the use of the Low-Income Multiplier in this context.
- PWD-I-4. Please provide the following with respect to the use of the Low-Income Multiplier in determining the TAP Offset percentage:
- (a) the rationale for applying the Low-Income Multiplier;
  - (b) the specific calculations used to derive the Low-Income Multiplier; and
  - (c) the PWD specific data sources used to determine the Low-Income Multiplier.
- PWD-I-5. Please explain in detail how the Average Arrearage Forgiveness Benefit (A/F Benefit) amount is be determined for each Rate Period and the sources of information that the Advocate proposes should be used in determining the A/F Benefit.
- PWD-I-6. Please describe in detail the following on the Arrearage Forgiveness Offset percentage calculation shown in the RDC TAP Rider Offsets file:
- (a) the rationale for deeming all of the “Not Collected” amount as Arrearage;
  - (b) the rationale for applying a Low-Income Multiplier;
  - (c) the specific calculations used to derive the Low-Income Multiplier; and
  - (d) the specific PWD data sources used to determine the Low-Income Multiplier.
- PWD-I-7. Please explain how the Estimated TAP Usage volume is determined for each Rate Period.
- PWD-I-8. Explain how the Actual TAP Usage volume is to be determined for each rate period.
- PWD-I-9. Please explain the basis and the data sources used to determine the Interest Rate.
- PWD-I-10. With respect to the spread sheet entitled “RDC Tap Rate Rider Offsets,” please provide the source material or direct reference (PUC docket number) for “PUC BCS Penn avg elec. and gas” used in connection with the Low-Income Multiplier.

Respectfully submitted,

/s/ Andre C. Dasent

Andre C. Dasent, Esquire  
Attorney for Philadelphia Water Department

1500 Market Street, 12<sup>th</sup> Floor  
Philadelphia, Pennsylvania 19102  
(215) 625-0555

Date: March 1, 2018

Of Counsel:  
Scott Schwarz, Esquire  
Ji Jun, Esquire  
Susan Crosby, Esquire