

**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
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**Philadelphia Large Users Group's ("PLUG")
Interrogatories & Requests for Production of Documents
To the Philadelphia Water Department ("PWD")**

Pursuant to the Hearing Officer's Procedural Rules for this Rate Proceeding, the Philadelphia Large Users Group's ("PLUG") requests that the Philadelphia Water Department ("PWD") provide full and complete answers to the following interrogatories with seven (7) calendar days of 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.

Interrogatories

PLUG-PWD-1 Please explain whether any cost cap, budget, or other mechanism limits the annual costs recovered from non-Tiered Assistance Program ("TAP") customers through the proposed TAP rider.

Respectfully submitted,

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