

1 **RESPONSE TO PUBLIC ADVOCATE INTERROGATORIES**
2 **AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

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5 **PA-TRR-1.** REFERENCE TABLE TRR_PROJECTIONS. PLEASE PROVIDE
6 THE TOTAL PARTICIPANTS, TOTAL DISCOUNTS, TOTAL
7 WATER CONSUMPTION AND TOTAL SEWER CONSUMPTION
8 FOR TAP PARTICIPANTS FOR THE SIX MONTHS MARCH
9 2018 THROUGH AUGUST 2018 IN THE FORMAT SHOWN ON
10 THE TABLE TRR_PROJECTIONS.

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12 **RESPONSE:**

13 The tables below are intended to answer the request made in PA-TRR-1. Data are shown by
14 calendar month, which include the total participants, total discounts, total water consumption,
15 and total sewer consumption for TAP participants. Data for the months March 2018 through
16 August 2018 are added to the original table as requested.

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18 **Table TRR_PROJECTIONS**
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Data Type	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual
Projected Increase in TAP Participants	Mar 2018	Apr 2018	May 2018	Jun 2018	Jul 2018	Aug 2018	Sep 2018	Oct 2018	Nov 2018	Dec 2018		
TAP Participants	7,191	8,073	9,091	10,906	12,620	13,932	13,900	15,208	15,724	15,856		
Total Participants	7,191	8,073	9,091	10,906	12,620	13,932	13,900	15,208	15,724	15,856		
TAP Discount	Mar 2018	Apr 2018	May 2018	Jun 2018	Jul 2018	Aug 2018	Sep 2018	Oct 2018	Nov 2018	Dec 2018		
Total Discounts	\$ 360,263.54	\$ 372,296.77	\$ 428,926.12	\$ 574,007.94	\$ 622,323.08	\$ 707,473.37	\$ 839,632.13	\$ 771,033.54	\$ 820,363.48	\$ 788,793.40		
TAP Water Consumption	Mar 2018	Apr 2018	May 2018	Jun 2018	Jul 2018	Aug 2018	Sep 2018	Oct 2018	Nov 2018	Dec 2018		
Total Water Consumption	53,662	55,247	63,766	85,735	93,342	106,571	125,292	116,321	123,998	120,173		
TAP Sewer Consumption	Mar 2018	Apr 2018	May 2018	Jun 2018	Jul 2018	Aug 2018	Sep 2018	Oct 2018	Nov 2018	Dec 2018		
Total Sewer Consumption	53,662	55,247	63,766	85,734	93,336	106,565	125,285	116,303	123,993	120,167		

Data Type	Actual	Actual	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected Next Rate Year
Projected Increase in TAP Participants	Jan 2019	Feb 2019	Mar 2019	Apr 2019	May 2019	Jun 2019	Jul 2019	Aug 2019	Sep 2019	Aug 2020				0.00%
TAP Participants	15,942	14,412	14,700	14,994	15,293	15,598	15,909	16,227	16,227	16,227				16,227
Total Participants	15,942	14,412	14,700	14,994	15,293	15,598	15,909	16,227	16,227	16,227				16,227
TAP Discount	Jan 2019	Feb 2019	Mar 2019	Apr 2019	May 2019	Jun 2019	Jul 2019	Aug 2019	Sep 2019	Aug 2020				
Total Discounts	\$ 783,095.51	\$ 720,950.10	\$ 762,783.00	\$ 778,038.66	\$ 793,553.77	\$ 809,380.22	\$ 825,518.01	\$ 842,019.03	\$	\$				10,104,228.36
TAP Water Consumption	Jan 2019	Feb 2019	Mar 2019	Apr 2019	May 2019	Jun 2019	Jul 2019	Aug 2019	Sep 2019	Aug 2020				
Total Water Consumption	119,891	110,548	115,689	118,003	120,356	122,756	125,204	127,706	127,706	127,706				127,706
TAP Sewer Consumption	Jan 2019	Feb 2019	Mar 2019	Apr 2019	May 2019	Jun 2019	Jul 2019	Aug 2019	Sep 2019	Aug 2020				
Total Sewer Consumption	119,885	110,543	115,689	118,003	120,356	122,756	125,204	127,706	127,706	127,706				127,706

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-TRR-2.**

PLEASE PROVIDE ACTUAL DATA FOR THE SIX MONTHS
 2 MARCH 2018 THROUGH AUGUST 2018 FOR WATER BILLED
 3 VOLUME AND SEWER BILLED VOLUME IN THE FORMAT
 4 SHOWN IN DR_1 AND DR_2, RESPECTIVELY.

7 **RESPONSE:**

8 **Tables DR_1 and DR_2**

9 These tables are intended to answer the request made in PA-TRR-2. Data are shown by calendar
 10 month, which include water billed volume and sewer billed volume. Actual data for the months
 11 March 2018 through August 2018 are added to the original tables as requested.

13 **DR_1:**

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DR-1: Water Billed Volume (March 1, 2018-February 28, 2019)					
Customer Group	Discount Group	March 2018 Water Billed Volume (CCF)	April 2018 Water Billed Volume (CCF)	May 2018 Water Billed Volume (CCF)	June 2018 Water Billed Volume (CCF)
TAP	All Groups	53,662	55,247	63,766	85,735
Non-TAP	Senior Discount	93,196	82,003	86,106	96,362
Non-TAP	PHA Discount	122,267	121,848	141,915	137,386
Non-TAP	Non-PHA Discount (Other discount)	343,264	335,620	385,237	394,016
Non-TAP	No Additional Discount	4,154,989	3,794,821	4,059,954	4,476,007
PWD (not subject to reconciliation)	PWD	177,971	166,596	206,531	257,907

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Water Billed Volume Subtotals, by Customer Group					
Customer Group		March 2018 Water Billed Volume (CCF)	April 2018 Water Billed Volume (CCF)	May 2018 Water Billed Volume (CCF)	June 2018 Water Billed Volume (CCF)
TAP		53,662	55,247	63,766	85,735
Non-TAP		4,713,716	4,334,292	4,673,212	5,103,771
PWD (not subject to reconciliation)		177,971	166,596	206,531	257,907

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DR-1: Water Billed Volume (March 1, 2018-February 28, 2019)					
Customer Group	Discount Group	July 2018 Water Billed Volume (CCF)	August 2018 Water Billed Volume (CCF)	September 2018 Water Billed Volume (CCF)	October 2018 Water Billed Volume (CCF)
TAP	All Groups	93,342	106,571	125,292	116,321
Non-TAP	Senior Discount	89,451	87,754	95,775	85,299
Non-TAP	PHA Discount	144,035	138,589	159,146	124,229
Non-TAP	Non-PHA Discount (Other discount)	385,767	435,825	443,544	396,523
Non-TAP	No Additional Discount	4,515,736	4,474,560	4,841,437	4,279,138
PWD (not subject to reconciliation)	PWD	192,302	206,133	311,567	257,797

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Water Billed Volume Subtotals, by Customer Group					
Customer Group		July 2018 Water Billed Volume (CCF)	August 2018 Water Billed Volume (CCF)	September 2018 Water Billed Volume (CCF)	October 2018 Water Billed Volume (CCF)
TAP		93,342	106,571	125,292	116,321
Non-TAP		5,134,989	5,136,728	5,539,902	4,885,189
PWD (not subject to reconciliation)		192,302	206,133	311,567	257,797

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DR-1: Water Billed Volume (March 1, 2018-February 28, 2019)					
Customer Group	Discount Group	November 2018 Water Billed Volume (CCF)	December 2018 Water Billed Volume (CCF)	January 2019 Water Billed Volume (CCF)	February 2019 Water Billed Volume (CCF)
TAP	All Groups	123,998	120,173	119,891	110,548
Non-TAP	Senior Discount	84,738	82,080	82,128	80,098
Non-TAP	PHA Discount	129,788	123,552	123,004	117,002
Non-TAP	Non-PHA Discount (Other discount)	457,894	315,094	292,239	316,099
Non-TAP	No Additional Discount	4,274,207	4,094,436	3,971,894	3,865,198
PWD (not subject to reconciliation)	PWD	256,908	235,240	237,363	118,896

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Water Billed Volume Subtotals, by Customer Group					
Customer Group		November 2018 Water Billed Volume (CCF)	December 2018 Water Billed Volume (CCF)	January 2019 Water Billed Volume (CCF)	February 2019 Water Billed Volume (CCF)
TAP		123,998	120,173	119,891	110,548
Non-TAP		4,946,627	4,615,162	4,469,265	4,378,397
PWD (not subject to reconciliation)		256,908	235,240	237,363	118,896

DR_2:

DR-2: Sewer Billed Volume (March 1, 2018-February 28, 2019)					
Customer Group	Discount Group	March 2018 Sewer Billed Volume (CCF)	April 2018 Sewer Billed Volume (CCF)	May 2018 Sewer Billed Volume (CCF)	June 2018 Sewer Billed Volume (CCF)
TAP	All Groups	53,662	55,247	63,766	85,734
Non-TAP	Senior Discount	93,119	81,925	86,014	96,265
Non-TAP	PHA Discount	122,267	121,848	141,915	137,386
Non-TAP	Non-PHA Discount (Other discount)	316,946	277,579	314,156	354,086
Non-TAP	No Additional Discount	3,937,219	3,586,071	3,844,617	4,209,200
PWD (not subject to reconciliation)	PWD	177,847	166,464	206,407	257,775

Sewer Billed Volume Subtotals, by Customer Group					
Customer Group		March 2018 Sewer Billed Volume (CCF)	April 2018 Sewer Billed Volume (CCF)	May 2018 Sewer Billed Volume (CCF)	June 2018 Sewer Billed Volume (CCF)
TAP		53,662	55,247	63,766	85,734
Non-TAP		4,469,551	4,067,423	4,386,702	4,796,937
PWD (not subject to reconciliation)		177,847	166,464	206,407	257,775

DR-2: Sewer Billed Volume (March 1, 2018-February 28, 2019)					
Customer Group	Discount Group	July 2018 Sewer Billed Volume (CCF)	August 2018 Sewer Billed Volume (CCF)	September 2018 Sewer Billed Volume (CCF)	October 2018 Sewer Billed Volume (CCF)
TAP	All Groups	93,336	106,565	125,285	116,303
Non-TAP	Senior Discount	89,378	87,685	95,691	85,228
Non-TAP	PHA Discount	143,915	137,663	158,993	124,198
Non-TAP	Non-PHA Discount (Other discount)	336,147	382,945	389,372	381,456
Non-TAP	No Additional Discount	4,234,467	4,195,763	4,517,917	4,037,856
PWD (not subject to reconciliation)	PWD	192,170	206,005	311,422	257,677

Sewer Billed Volume Subtotals, by Customer Group					
Customer Group		July 2018 Sewer Billed Volume (CCF)	August 2018 Sewer Billed Volume (CCF)	September 2018 Sewer Billed Volume (CCF)	October 2018 Sewer Billed Volume (CCF)
TAP		93,336	106,565	125,285	116,303
Non-TAP		4,803,907	4,804,056	5,161,973	4,628,738
PWD (not subject to reconciliation)		192,170	206,005	311,422	257,677

DR-2: Sewer Billed Volume (March 1, 2018-February 28, 2019)					
Customer Group	Discount Group	November 2018 Sewer Billed Volume (CCF)	December 2018 Sewer Billed Volume (CCF)	January 2019 Sewer Billed Volume (CCF)	February 2019 Sewer Billed Volume (CCF)
TAP	All Groups	123,993	120,167	119,885	110,543
Non-TAP	Senior Discount	84,654	81,991	82,047	80,014
Non-TAP	PHA Discount	129,788	123,552	123,004	117,002
Non-TAP	Non-PHA Discount (Other discount)	425,310	295,045	272,370	292,509
Non-TAP	No Additional Discount	4,030,373	3,876,752	3,736,975	3,682,017
PWD (not subject to reconciliation)	PWD	256,780	235,103	237,235	118,772

Sewer Billed Volume Subtotals, by Customer Group					
Customer Group		November 2018 Sewer Billed Volume (CCF)	December 2018 Sewer Billed Volume (CCF)	January 2019 Sewer Billed Volume (CCF)	February 2019 Sewer Billed Volume (CCF)
TAP		123,993	120,167	119,885	110,543
Non-TAP		4,670,125	4,377,340	4,214,396	4,171,542
PWD (not subject to reconciliation)		256,780	235,103	237,235	118,772

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-TRR-3.**

2 PLEASE CONFIRM THAT WHEN CALCULATING THE TAP
3 BILLING LOSS FOR A CUSTOMER WHO IS ALSO ENTITLED
4 TO OTHER DISCOUNTS (E.G., THE SENIOR CITIZEN
5 DISCOUNT), THE BILLING LOSS ATTRIBUTED TO TAP IS
6 CALCULATED AFTER DISCOUNTS FROM OTHER PROGRAMS
7 ARE APPLIED. PLEASE PROVIDE AN ILLUSTRATION FROM
8 A TAP CUSTOMER BILL (WITH IDENTIFYING INFORMATION
9 REDACTED).

10 **RESPONSE:**

11 Confirmed. The TAP Billing Loss (called “Total Discounts” in the TRR_Projections table) is
12 only the billing loss attributed to TAP calculated after discounts from other programs are
13 applied.

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15 It should be noted that a customer enrolled in TAP will not be eligible for an additional discount
16 as an income-eligible senior citizen. For billing purposes, however; the customer bill is first
17 reduced by the senior discount and further reduced to achieve the TAP amount.

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19 The following sample bill shows a customer eligible for a senior citizens discount as well as
20 TAP. Only the TAP Discount of \$12.58 is included in the TAP Billing Loss figure.

Water/Sewer & Stormwater Bill

Please pay **\$19.77**

Questions?

www.phila.gov/revenue

(215) 685-6300 Monday-Friday, 8am-5pm

Customer Name: [REDACTED]

Service Address: [REDACTED], Philadelphia PA 19120

Bill Date: April 01, 2019 (Bill Period: Feb 28, 2019 - Mar 28, 2019)

Account Number: [REDACTED]

Water Access Code: [REDACTED]

Bill Number: [REDACTED]

Includes Payments Through: April 01, 2019

Your Account

Water/Sewer/Stormwater balance at last bill	\$19.80
You last paid on 03/10/19 - thank you	-\$19.80
Account Balance	\$0.00

This Bill

Usage Charge (2 ccf, see page 2 for details)	\$15.45
Service Charge	\$12.16
Stormwater Charge	\$15.53
Senior Citizen Discount	-\$10.79
TAP Discount	-\$12.58
Total Current Charges	\$19.77
Total Account Balance	\$19.77
Please Pay Now	\$19.77
Your monthly TAP charge	\$19.77

Payment Types

Pay by phone (877) 309-3709; credit card or e-check at www.phila.gov. Select water bill from pay menu options.

See back for more information and contact details →

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

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PA-TRR-4. PLEASE PROVIDE THE BASIS FOR THE 2% GROWTH FACTOR
USED IN THE TRR_PROJECTIONS.

RESPONSE:

The 2% monthly growth rates used in the projections for the second half of the Current Rate Period were consistent with the monthly projections used to forecast TAP enrollment growth in the 2018 Rate Case. This modest growth rate reflects ongoing outreach efforts by the Department to inform customers about TAP. It should be noted that because the projections are built upon the February 2019 number, the enrollment projection for the Next Rate Period (beginning September 1, 2019) is less than 2% higher than peak program enrollment from January 2019, making overall projection estimates more conservative (i.e. lower than originally assumed in the prior rate case).

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-TRR-5.**

PLEASE EXPLAIN THE REASON FOR THE DECLINE IN
2 PARTICIPANTS FROM JANUARY TO FEBRUARY 2019. IF
3 AVAILABLE, PLEASE PROVIDE THE ACTUALS NUMBER OF
4 PARTICIPANTS FOR MARCH 2019.

5
6 **RESPONSE:**

7
8 February 2019 coincided both with moratorium and with the ramp up of recertifications for TAP.
9 Customers who do not recertify in the program are removed from TAP. Although we have not
10 had the opportunity of analyzing the data extensively, customers may have chosen not to
11 recertify during moratorium because they would not be subject to shut off and did not need to
12 take advantage of the shut off protection afforded them by TAP participation. Customers who
13 did not recertify would not have received TAP bills in February. The actual number of
14 participants in March 2019 was 14,784¹.

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19 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

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28 ¹This figure uses the same definition of participants as was used in developing all other supporting figures for the rider. It relies on production data as of April 1, 2019. Report results from production data are not able to be exactly reproduced as production data are always being updated.

1 **PA-TRR-6.** THE CHART BELOW IS ADOPTED FROM THE TRR_PROJECTIONS TAB.
 2 PLEASE EXPLAIN WHY THE DISCOUNT PER PARTICIPANT, WATER CONSUMPTION
 3 PER PARTICIPANT AND SEWER CONSUMPTION PER PARTICIPANT DATA FOR
 4 SEPTEMBER 2018 ARE OUT OF THE RANGE CALCULATED FOR OCTOBER 2018
 5 THROUGH FEBRUARY 2019.

Data Type	Actual	Actual	Actual	Actual	Actual	Actual
Projected Increase in Participants						
Participants	Sep 2018	Oct 2018	Nov 2018	Dec 2018	Jan 2019	Feb 2019
Total Participants	13,900	15,208	15,724	15,856	15,942	14,412
Discount	Sep 2018	Oct 2018	Nov 2018	Dec 2018	Jan 2019	Feb 2019
Total Discounts	\$ 839,632.13	\$ 771,033.54	\$ 820,363.48	\$ 788,793.40	\$ 783,095.51	\$ 720,950.10
Discount per participant	\$ 60.41	\$ 50.70	\$ 52.17	\$ 49.75	\$ 49.12	\$ 50.02
Water Consumption	Sep 2018	Oct 2018	Nov 2018	Dec 2018	Jan 2019	Feb 2019
Total Water Consumption	125,292	116,321	123,998	120,173	119,891	110,548
Water Consumption per participant	9.01	7.65	7.89	7.58	7.52	7.67
Total Sewer Consumption	Sep 2018	Oct 2018	Nov 2018	Dec 2018	Jan 2019	Feb 2019
Total Sewer Consumption	125,285	116,303	123,993	120,167	119,885	110,543
Sewer Consumption per participant	9.01	7.65	7.89	7.58	7.52	7.67

15 **RESPONSE:**

16 Historically, residential consumption for the entire customer base has peaked on or around
 17 September of each year. Total Discounts and Sewer Consumption are associated with Water
 18 Consumption. The table² below shows Total Water Consumption (in cubic feet) for the months
 19 of September through February of the three prior fiscal years for residential customer types

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 21 Because consumption fluctuates from month to month, an average of consumption across months
 22 was used to develop the projections for the rider.

	SEPTEMBER	OCTOBER	NOVEMBER	DECEMBER	JANUARY	FEBRUARY
FY2016	271,918,200	267,194,100	252,400,400	264,450,500	244,704,100	264,603,900
FY2017	293,489,000	265,281,400	247,445,100	251,612,500	273,967,900	224,127,300
FY2018	272,752,900	246,122,000	253,429,500	249,685,700	265,209,700	253,638,400

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² This figure excludes any negative consumption bills as these consumption levels indicate usage adjustments.

1 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

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