

**BEFORE THE PHILADELPHIA WATER, SEWER AND STORM WATER
RATE BOARD**

In the Matter of Philadelphia Water Department :
Reconciliation of the Tiered Assistance Program : **Effective October 1, 2020**
Rate Rider Surcharge Rates (TAP-R) :

Public Advocate's Interrogatories & Requests for Production of Documents

- PA-TAP-1. Reference Rate Rider - Reconciliation Workbook 20200519 FINAL.xlsx, Customer Tab. Please separately provide the total monthly number of water and sewer customers from September 2018 through February 2020.
- PA-TAP-2. Reference Rate Rider - Reconciliation Workbook 20200519 FINAL.xlsx, Assumptions and Inputs Tab. Does PWD still believe the “Non-TAP Sales Adjustment Next Rate Period” of 1.05%, based on data from the FY 2021 to FY 2022 Rate Proceeding, is still realistic? If yes, please provide evidence to support the claim. If no, please provide the revised rate and supporting documentation.
- PA-TAP-3. Please explain why the growth factor used in the TRR_Projections is assumed to be 0%.
- PA-TAP-4. Given the current economic conditions resulting from the COVID-19 pandemic, doesn't PWD expect there to be an impact on the TAP-R participants? Please explain why there is no recognition of this potential impact on the proposed TAP-R rates effective October 1, 2020.