

**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 : **Reconciliation of the Tiered Assistance Program Rate Rider Surcharge Rates (TAP-R) as of September 1, 2021**

**PUBLIC ADVOCATES DISCOVERY REQUESTS
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SET I

- PA-TAP-1. Please provide the electronic workpapers supporting Schedules BV-1 and BV-2, with the formulae intact.
- PA-TAP-2. Please provide the 2021 TAP Reconcilable Rider Reports and Projection Model prepared by Raftelis in Excel format with the formulae intact.
- PA-TAP-3. Please fully explain why there is a projected decrease of 6% in the number of participants during the month of February 2021, but the remaining months of the projected period are projected at the January 2021 number of participants on the page labeled "PDF Page 72 of 77".
- PA-TAP-4. If the data is available, please update the model to reflect the actual February 2021 number of participants and activity.
- PA-TAP-5. According to the footnote on the pages labeled as "PDF Pages 71 and 72 of 77", the TAP participants were "lower in September-November of 2020 because they excluded customers who originally received a TAP bill but were subsequently reversed and rebilled in December 2020." Please clarify what happened here.
- a. What does "subsequently reversed" mean?
 - b. Why weren't the participants in those months restated?
 - c. How does this event affect the statistics such as cost per bill, consumption per customer per month, etc.?
- PA-TAP-6. Reference BV-1, Table 2. As a matter of consistency, please explain why it would not be reasonable to reflect the 60/40 allocation between wastewater and water as presented in the Department's current rate case before the Board.