

**RESPONSE TO**  
**PUBLIC ADVOCATE'S INTERROGATORIES**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**QUESTIONS 1-6**

**Dated: April 2021**

1 **PA-TAP-1.** PLEASE PROVIDE THE ELECTRONIC WORKPAPERS SUPPORTING  
2 SCHEDULES BV-1 AND BV-2, WITH THE FORMULAE INTACT.  
3

4 **RESPONSE:**

5 Please refer to the attached Rate Rider - Reconciliation Workbook and the Customer Bill  
6 Impact Workbook.  
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8 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.  
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1 **PA-TAP-2.** PLEASE PROVIDE THE 2021 TAP RECONCILABLE RIDER REPORTS AND  
2 PROJECTION MODEL PREPARED BY RAFTELIS IN EXCEL FORMAT  
3 WITH THE FORMULAE INTACT.  
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5 **RESPONSE:**

6 Please see attachment PA-TAP-2 Rate Rider Reporting Model 20210308.  
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8 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-TAP-3.** PLEASE FULLY EXPLAIN WHY THERE IS A PROJECTED DECREASE OF  
2 6% IN THE NUMBER OF PARTICIPANTS DURING THE MONTH OF  
3 FEBRUARY 2021, BUT THE REMAINING MONTHS OF THE PROJECTED  
4 PERIOD ARE PROJECTED AT THE JANUARY 2021 NUMBER OF  
5 PARTICIPANTS ON THE PAGE LABELED "PDF PAGE 72 OF 77".  
6

7 **RESPONSE:**

8 As discussed in Schedule RFC-1, projections relied on January, rather than February, 2020  
9 figures because in past years, February has shown uncharacteristically low participation (as  
10 defined as unique customers receiving a TAP bill during the month), likely owing to the  
11 limited number of billing days during the month. In 2019, February participation was  
12 approximately 10% lower than January participation. In 2020, February participation was  
13 approximately 6% lower than January participation.  
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15 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-TAP-4.** IF THE DATA IS AVAILABLE, PLEASE UPDATE THE MODEL TO  
2 REFLECT THE ACTUAL FEBRUARY 2021 NUMBER OF PARTICIPANTS  
3 AND ACTIVITY.

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5 **RESPONSE:**

6 A newer version of the rate rider report does not exist.

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

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1 **PA-TAP-5.** ACCORDING TO THE FOOTNOTE ON THE PAGES LABELED AS “PDF  
2 PAGES 71 AND 72 OF 77”, THE TAP PARTICIPANTS WERE “LOWER IN  
3 SEPTEMBER-NOVEMBER OF 2020 BECAUSE THEY EXCLUDED  
4 CUSTOMERS WHO ORIGINALLY RECEIVED A TAP BILL BUT WERE  
5 SUBSEQUENTLY REVERSED AND REBILLED IN DECEMBER 2020.”  
6 PLEASE CLARIFY WHAT HAPPENED HERE.

7 **A.** WHAT DOES “SUBSEQUENTLY REVERSED” MEAN?

8 **B.** WHY WEREN’T THE PARTICIPANTS IN THOSE MONTHS RESTATED?

9 **C.** HOW DOES THIS EVENT AFFECT THE STATISTICS SUCH AS COST PER  
10 BILL, CONSUMPTION PER CUSTOMER PER MONTH, ETC.?  
11

12 **RESPONSE:**

13 Billing system enhancements to manage principal forgiveness were introduced in late  
14 August 2020. Due to a minor flaw in the code, about 2,200 TAP customers had account  
15 balances that were incorrectly updated during the billing process in September, October,  
16 and early November. The code that was creating the problem was removed on November 4,  
17 2020 and the affected customers’ accounts were corrected on December 13, 2020. The  
18 correction involved reversing the original bills and reissuing them with corrected balances  
19 (known as rebilling). The original bills are not counted among the “Number of TAP Bills  
20 Issued” in reporting, and the approximately 2,200 customers who received those original  
21 bills are not counted among “TAP Participants.” The re-issued bills were dated in December  
22 and are counted among the “Number of TAP Bills Issued.” “TAP Participants” counts  
23 unique customers, so those that received one or more corrected (re-issued) TAP bills and a  
24 regular TAP bill in December are still counted only once as a TAP Participant in December.  
25

26 This event does not affect cost or consumption statistics, as they relate discounts and  
27 consumption to the bill in the month the bill is issued (that is, the original bill if it is not  
28 reversed and rebilled, or the re-issued bill if applicable).

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

1 **PA-TAP-6.** REFERENCE BV-1, TABLE 2. AS A MATTER OF CONSISTENCY, PLEASE  
2 EXPLAIN WHY IT WOULD NOT BE REASONABLE TO REFLECT THE  
3 60/40 ALLOCATION BETWEEN WASTEWATER AND WATER AS  
4 PRESENTED IN THE DEPARTMENT'S CURRENT RATE CASE BEFORE  
5 THE BOARD.

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7 **RESPONSE:**

8 The reconciliation calculations were completed in accordance with the existing TAP Rate  
9 Rider language reflected in the Water Department's Rates and Charges dated October 1,  
10 2020.

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12 The Rate Board has not approved the proposed changes to the TAP Rate Rider language at  
13 this time.

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15 It would not be unreasonable to use the 60/40 allocation between wastewater and water in  
16 context of the C-Factor calculation, provided the Rate Board adopts the base rates and  
17 charges as filed.

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19 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.  
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