

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-4

Dated: February 2022

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

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5 **RESPONSE:**

6 Please refer to the attached Rate Rider - Reconciliation Workbook and the Customer Bill
7 Impact Workbook. Please note that, since the filing of the Advance Notice in the 2022 TAP-
8 R proceeding, Schedule BV-1 and BV-2 have been revised to include December 2021 actual
9 data and updated projections of TAP participation anticipated as a result of the inclusion of
10 certain customers enrolled in the Low-Income Household Water Assistance Program
11 (LIHWAP). See also, response to PA-TAP-2.

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

1 **PA-TAP-2.** PLEASE PROVIDE SCHEDULE RFC-3 IN ELECTRONIC FORMAT (EXCEL)
2 FORMAT WITH THE FORMULAE INTACT.
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4 **RESPONSE:**

5 Schedule RFC-3.xlsx is provided with formulae intact. Please note that since the filing of
6 the Advance Notice in the 2022 TAP-R proceeding, Schedule RFC-3.xlsx has been
7 updated to include December 2021 actual data. The report covers actual data for months
8 contained in two periods: Reconciled Period – February 2021 to August 2021 and Most
9 Recent Period – September 2021 to December 2021. Schedule RFC-3.xlsx has also been
10 revised to include updated projections of TAP participation in light of the anticipated
11 inclusion of certain customers enrolled in the Low-Income Household Water Assistance
12 Program (LIHWAP). The updated TAP-R filing reflects 12,500 additional TAP
13 participants in FY 2023.
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15 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-TAP-3.** PLEASE PROVIDE THE SUPPORT FOR THE 97.32 PERCENT COLLECTION
2 FACTOR.

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4 **RESPONSE:**

5 The 97.32 percent collection factor is included in the definition of the E-Factor as
6 presented on Page 36 of the Water Department's existing rates and charges effective
7 September 1, 2021.

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

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1 **PA-TAP-4.** ACCORDING TO SCHEDULE BV-3, PAGE 3, THE CITY IS EXPLORING
2 THE POTENTIAL FOR CUSTOMER AUTO ENROLLMENT FOR TAP.
3 PLEASE EXPLAIN HOW THE AUTO ENROLLMENT PROCESS WILL
4 WORK IN COMPARISON WITH THE CURRENT TAP ENROLLMENT
5 PROCESS.

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7 **RESPONSE:**

8 The Raftelis team is currently working closely with PWD and WRB to design an algorithm
9 for a pilot program to enable rapid enrollment of LIHWAP grant recipients into TAP. Under
10 the pilot program, customers would be enrolled without submitting a separate application
11 for assistance to the City. The algorithm will allow WRB's Customer Assistance Division
12 to perform intake of customers who have received the LIHWAP grant and use their income
13 and household information to approve them for TAP. The project team believes that the
14 majority of LIHWAP recipients will be eligible to be enrolled in TAP because of the two
15 programs' common residency and income requirements. Please note that certain LIHWAP
16 recipients may already participate in PWD/WRB assistance programs.

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18 **RESPONSE PROVIDED BY:** The City of Philadelphia
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