

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

**Reconciliation of the Tiered Assistance Program Rate Rider
Surcharge Rates (TAP-R) as of September 1, 2022**

Public Advocate's Second Set of Interrogatories & Requests for Production of Documents

- PA-TAP-5. Reference Schedule RFC-4, page 1. Please provide copies of the eligibility requirements for PGW's Customer Responsibility Program and senior discount program that were used in your analysis.
- PA-TAP-6. Reference Schedule RFC-4, page 1. Please provide your understanding of why PWD has more active participants than PGW in its Senior Citizen Discount Program, as a percentage of total Assistance Program Participation.
- PA-TAP-7. Reference Schedule RFC-4, page 2. Please provide the basis for the statement that "...it is assumed for these projections that LIHWAP participation rates would resemble those of LIHEAP." In your response, please provide any supporting documentation and or other evidence that shows that LIHWAP will be administered in the same manner as LIHEAP.
- PA-TAP-8. Reference Schedule RFC-4, page 2. Please provide documentation showing the basis for the statement "...it is assumed that much of the difference in the number of total participants can be attributed to LIHEAP participation."
- PA-TAP-9. Reference Schedule RFC-4, page 1. It is stated that "...the City of Philadelphia is working with the Commonwealth of Pennsylvania to devise a process to expedite the eligibility determination for TAP." Please provide the City and Commonwealth's respective estimates of the expected number of participants.
- PA-TAP-10. Reference Schedule RFC-4, page 1. Please explain why the following statement is of significance: "PGW received roughly 26,000 LIHEAP grants in FY 2021 (about half of their CRP customers provide a grant to PGW)." Please provide the perspective for this statement.
- PA-TAP-11. Please provide the data showing the level of participation in the first five years of PGW's participation in the LIHEAP program.
- PA-TAP-12. Please provide the enrollment eligibility requirements for LIHEAP and LIHWAP.
- PA-TAP-13. Please explain whether, with automatic enrollment, the customer has the power to opt out of the LIHWAP program.
- PA-TAP-14. Please explain whether the customer has the power to opt out of the LIHEAP program.
- PA-TAP-15. Please provide the supporting basis, including any supporting documentation, for the following statement: "Since the income and household size of LIHWAP applicants is currently unknown, and since TAP discounts are based on income and household size, the projection assumes that the average customer discount will be the same as the current TAP average discount."