

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**

**Philadelphia Large Users Group Interrogatories and Requests for Production of
Documents to Philadelphia Water Department**

1. See pages 5-6 of PWD Rebuttal Statement No. 1, stating “The Department acknowledges that this potential new participant pool would be reduced by some amount to reflect energy assistance applicants who are customers of PGW but not customers of PWD. The Department made an allowance for this reduction in their projections.”
 - a. Provide a detailed narrative description of the referenced allowance.
 - b. Provide a detailed quantification of the referenced allowance.
 - c. Provide workpapers showing the application of the referenced allowance.
2. Reference the Public Advocate’s Fourth Set of Interrogatories and Requests for Production of Documents (“PA Set IV”)
 - a. Provided any information responsive to PA Set IV has been furnished either informally or formally to the Public Advocate to date.
 - b. Provided written responses to PA Set IV as if stated herein in its entirety.
3. Provide a detailed explanation of any customer protections intended to preserve the reasonableness of TAP-R costs recovered from non-TAP-R customers.