

RESPONSE TO
PHILADELPHIA LARGE USERS GROUP'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-3

Dated: April 2022

1 **PLUG-I-1.** SEE PAGES 5-6 OF PWD REBUTTAL STATEMENT NO. 1, STATING “THE
2 DEPARTMENT ACKNOWLEDGES THAT THIS POTENTIAL NEW
3 PARTICIPANT POOL WOULD BE REDUCED BY SOME AMOUNT TO
4 REFLECT ENERGY ASSISTANCE APPLICANTS WHO ARE CUSTOMERS
5 OF PGW BUT NOT CUSTOMERS OF PWD. THE DEPARTMENT MADE AN
6 ALLOWANCE FOR THIS REDUCTION IN THEIR PROJECTIONS.”

7 A. PROVIDE A DETAILED NARRATIVE DESCRIPTION OF THE
8 REFERENCED ALLOWANCE.

9 B. PROVIDE A DETAILED QUANTIFICATION OF THE REFERENCED
10 ALLOWANCE.

11 C. PROVIDE WORKPAPERS SHOWING THE APPLICATION OF THE
12 REFERENCED ALLOWANCE.

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14 **RESPONSE:**

15 The reduction in projections is described in Schedule RFC-4, which is included in the
16 Formal Notice. [https://www.phila.gov/media/20220225145809/PWD-FY2023-TAP-R-
17 Formal-Notice-Final.pdf](https://www.phila.gov/media/20220225145809/PWD-FY2023-TAP-R-Formal-Notice-Final.pdf).

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19 The reduction was quantified as follows, Schedule RFC-4 at 2: “... PWD has about 85%
20 of the 489,000 residential customers that PGW has. As a result, it is assumed that most likely
21 amount of customers enrolling in LIHWAP who are not currently enrolled in a WRB
22 assistance program is about 85% of 14,500, or approximately 12,500.”

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24 The application of reduction is described in the above-quotation from Schedule RFC-4.

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26 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PLUG-I-2.** REFERENCE THE PUBLIC ADVOCATE’S FOURTH SET OF
2 INTERROGATORIES AND REQUESTS FOR PRODUCTION OF
3 DOCUMENTS (“PA SET IV”)

4 A. PROVIDED ANY INFORMATION RESPONSIVE TO PA SET IV HAS BEEN
5 FURNISHED EITHER INFORMALLY OR FORMALLY TO THE PUBLIC
6 ADVOCATE TO DATE.

7 B. PROVIDED WRITTEN RESPONSES TO PA SET IV AS IF STATED HEREIN
8 IN ITS ENTIRETY.

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10 **RESPONSE:**

11 “PA SET IV” consists of PA-TAP-17 through PA-TAP-25.

12 <https://www.phila.gov/media/20220311155152/PWD-TAP-R-PA-Set-IV.pdf>.

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14 Written responses to “PA SET IV” were provided by PWD and posted on the Rate Board’s
15 website as follows:

16 PA-TAP-17 through PA-TAP 23 and PA-TAP-25:

17 [https://www.phila.gov/media/20220322210141/Public-Advocate-TAP-Discovery-](https://www.phila.gov/media/20220322210141/Public-Advocate-TAP-Discovery-Sets-III-and-IV-Responses-Combined.pdf)
18 [Sets-III-and-IV-Responses-Combined.pdf](https://www.phila.gov/media/20220322210141/Public-Advocate-TAP-Discovery-Sets-III-and-IV-Responses-Combined.pdf)

19 PA-TAP-24:

20 <https://www.phila.gov/media/20220322210144/PWD-Response-to-TAP-24.pdf>

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22 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PLUG-I-3.** PROVIDE A DETAILED EXPLANATION OF ANY CUSTOMER
2 PROTECTIONS INTENDED TO PRESERVE THE REASONABLENESS OF
3 TAP-R COSTS RECOVERED FROM NON-TAP-R CUSTOMERS.
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5 **RESPONSE:**

6 The TAP-R surcharge is reviewed and adjusted annually based upon the approval of the
7 Philadelphia Water, Sewer and Storm Water Rate Board. This process provides the
8 opportunity to review the calculated components as defined in the TAP Rate Rider formula
9 under Section 10 of the Philadelphia Water Department's Rates and Charges.
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11 In addition, the TAP Rate Rider is reconcilable and is adjusted annually to account for any
12 over or under recovery including interest.
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14 Further during a general rate proceeding, the overall TAP Rate Rider recovery mechanism
15 and proposed revisions by participating parties may be considered and reviewed.
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17 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.
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