

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES (TAP SET I)
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-4

Dated: February 2023

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

RESPONSE:

Please refer to response attachments PA-TAP-1A and PA-TAP-1B, which include the Rate
Rider - Reconciliation Workbook and the Customer Bill Impact Workbook respectively.

Note – the file provided in PA-TAP-1B is the same document provided in response to PA-
I-48 in the 2023 General Rate Proceeding.

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

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

RESPONSE:

Refer to attachment PA-TAP-2.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.

1 **PA-TAP-3.** PLEASE PROVIDE THE ACTUAL MONTHLY TAP PARTICIPATION
2 LEVELS FOR THE MONTHS FOLLOWING NOVEMBER 2022. PLEASE
3 PROVIDE SUPPLEMENTAL RESPONSES TO THIS REQUEST WITH
4 UPDATED MONTHLY PARTICIPATION LEVELS THROUGH THE MONTH
5 OF APRIL 2023.
6

7 **RESPONSE:**

8 Refer to attachment PA-TAP-3, which is the same document as attachment PA-I-56 in the
9 2023 General Rate Proceeding. Actual monthly TAP participation is provided in the
10 column labeled "(b) Total TAP Participants." February 2023 through April 2023 data are
11 not yet available.
12

13 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PA-TAP-4. PLEASE PROVIDE SUPPORT FOR:

- A. THE PROJECTED INCREASE OF 716 TAP PARTICIPANTS (5%) IN DECEMBER 2022;
- B. THE PROJECTED INCREASE OF 2,255 TAP PARTICIPANTS (15%) IN JANUARY 2023; AND
- C. THE PROJECTED CONSTANT RATE OF TAP PARTICIPATION (17, 289) FROM FEBRUARY 2023 THROUGH AUGUST 2023.

RESPONSE:

The December projected increase anticipated enrollment trends to continue as they had through November 2022. As of the time the report was being prepared, it was anticipated that TAP pre-qualification for LIHWAP grant recipients would be completed in January, though the exact data structure and quality was at that time unknown, so a conservative projection was used. With no other major efforts planned as of the time the report was being prepared, steady participation was projected into the future.

RESPONSE PROVIDED BY: Raftelis Financial Consultants, Inc.