

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, 2023

Public Advocate's Responses to
PWD Interrogatories and Requests for Production of Documents

PWD-TAP-I-1. Please provide the electronic workpapers (Excel) supporting Schedules
LKM-1 to LKM-6, with the formulae intact.

Response:

See Attachment PWD-TAP-I-1, "*TAP-1A - Rate Rider (Modified BV Reconciliation Wkbk.xlsx)*".

PWD-TAP-I-2. Please provide the electronic workpapers (Excel) supporting the analysis of the number of TAP participants described in the Direct Testimony of Lafayette K. Morgan, Jr., (dated March 21, 2023), p. 6, lines 15 to 23.

Response:

See Attachment PWD-TAP-I-2 “PA-TAP-2(Modified Raftelis Wkprs).xlsx”
(tab:TRR_PROJECTIONS)

PWD-TAP-I-3. Please provide the total change in the number of TAP participants projected by Mr. Morgan between January 2023 (15,032) and August 2024.

Response:

See Attachment PWD-TAP-I-2 “*PA-TAP-2(Modified Raftelis Wkprs).xlsx*”
(tab:TRR_PROJECTIONS)

PWD-TAP-I-4. Please provide the monthly TAP participation levels and estimated TAP discounts used by Mr. Morgan for the following months:

- a. December 2022
- b. January 2023
- c. February 2023
- d. March 2023
- e. April 2023
- f. May 2023
- g. June 2023
- h. July 2023
- i. August 2023
- j. September 2023
- k. October 2023
- l. November 2023
- m. December 2023
- n. January 2024
- o. February 2024
- p. March 2024
- q. April 2024
- r. May 2024
- s. June 2024
- t. July 2024
- u. August 2024

Response: See Attachment PWD-TAP-I-2 “PA-TAP-2(Modified Raftelis Wkprs).xlsx”
(tab:TRR_PROJECTIONS)

PWD-TAP-I-5. Does Mr. Morgan agree that that the highest number of monthly TAP participants was 17,085 in December 2021? If Mr. Morgan does not agree, please state the basis for Mr. Morgan's disagreement.

Response:

No. The response to PA-TAP-3 shows 17,085 customers enrolled in TAP in December 2021. The response to PA-TAP-2 shows 17,092 customers enrolled in TAP in December 2021. The response to PA-TAP-1A shows 17,148 customers enrolled in TAP in December 2021.

PWD-TAP-I-6. Does Mr. Morgan believe that there were potential TAP participants who were not enrolled in TAP as of January 2023? Please explain why or why not.

Response:

This was not an issue addressed in Mr. Morgan's testimony. However, it seems likely based on Philadelphia's demographics that some low income customers who were eligible for TAP were not enrolled as of January 2023.

PWD-TAP-I-7. Is Mr. Morgan aware that the City Administration and the Commonwealth of Pennsylvania are coordinating to increase enrollment in TAP through use of program pre-qualification (hereafter referred to as “pre-qualification efforts”).

Response:

Mr. Morgan is aware that efforts to coordinate and share information are underway. He has not been informed as to if or when these efforts will result in increased enrollment.

PWD-TAP-I-8. Does Mr. Morgan agree that the “prequalification efforts” to enroll recipients/participants of other programs in TAP will increase enrollment and participation in TAP?

Response:

In the response to PA-TAP-4, PWD stated that “[t]he 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.”

Based on PWD’s statement above, the LIHWAP pre-qualification effort was to be completed in January, with no other major efforts being planned. Mr. Morgan has incorporated the actual participants through January 2023 in his analysis. With the January participants incorporated in the calculation, and no other major efforts planned, Mr. Morgan believes the normal growth pattern will resume. Therefore, it cannot be said for certain that the effort to coordinate information sharing regarding potential TAP participants will actually increase enrollment post-January 2023.

PWD-TAP-I-9. Please describe how Mr. Morgan’s analysis of TAP participant levels reflects “prequalification efforts” to enroll Low-Income Household Water Assistance (LIHWAP) recipients in TAP.

Response:

Please see the response to PWD-TAP-I-8. Given that PWD does not know “*the exact data structure and quality*” from the “prequalification efforts”, Mr. Morgan does not believe it is wise to speculate regarding the potential outcomes associated with the described “prequalification efforts.”

PWD-TAP-I-10. Please describe any assumptions made by Mr. Morgan regarding TAP participation levels between February 2023 and August 2024.

Response:

Please see the responses to PWD-TAP-I-8 and 9.

PWD-TAP-I-11. Please describe how the modest TAP participation increases reflected in Schedules LKM-1 through LKM-6 and referenced in Mr. Morgan's testimony account for "pre-qualification efforts" in connection with LIHWAP or other programs.

Response:

See response to PWD-TAP-I-9.

PWD-TAP-I-12. Did you submit testimony on behalf of the Public Advocate in the 2022 Annual Rate Adjustment Proceeding regarding the FY 2023 TAP-R Rate? If so, provide the testimony, supporting work papers and state the TAP participation levels set forth in the recommendations you presented in that proceeding.

Response:

Yes. Mr. Morgan's testimony is posted on the Board's website at <https://www.phila.gov/media/20220322210153/Combined-LKM-Testimony-TAP-R.pdf>. It includes the supporting work papers as Schedules LKM 1-8. LKM-8 includes the projected TAP enrollment reaching 23,422.

PWD-TAP-I-13. Please confirm or deny that in preparing your recommendation and testimony in this proceeding that you were aware that, in 2021, an extension for recertification of current TAP participants was implemented (extending the period for recertification from one year to three years).

Response:

Confirmed.

PWD-TAP-I-14. Do you agree that the increase in the period for recertification referenced in the previous question, will result in a new deadline in recertification for most TAP customers in March 2024 or later? (a) If you don't agree, please explain. (b) If you do agree, would you confirm or deny that this extension will have the effect of reducing the number of TAP participants that can be removed because of failure to recertify through at least March 2024?

Response:

Mr. Morgan agrees. The policy change should reduce the number of TAP participants removed due to inability or failure to recertify.

PWD-TAP-I-15. Do you agree that failure to recertify accounted for 100% of TAP participants that were removed from the program (TAP).

Response:

Mr. Morgan has not examined any data to enable him to opine on the reason for the removal of the participants.

PWD-TAP-I-16. Do you agree that the implementation of ratable forgiveness for pre-TAP debt for every TAP bill payment serves as an incentive for TAP enrollment?

Response:

Mr. Morgan has not examined any data related to the specific factors that incentivizes customers to enroll in TAP. This was not an issue addressed in Mr. Morgan's testimony.

PWD-TAP-I-17. Please identify other incentives for increased TAP enrollment that can be implemented and impact the next fiscal year (FY 2024).

Response:

This was not an issue addressed in Mr. Morgan's testimony.

PWD-TAP-I-18. Are you aware of application changes and administrative changes implemented to increase the ease of applying for TAP and other customer assistance programs offered by WRB and PWD?

Response:

Mr. Morgan has not examined any data related to application changes and administrative changes to increase the ease of applying for TAP. This was not an issue addressed in Mr. Morgan's testimony.