

BEFORE THE  
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

Re: Philadelphia Water Department Proposed Charges in Rates and Charges	2023 TAP-R Adjustment Proceeding
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**PHILADELPHIA WATER DEPARTMENT'S  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO THE PUBLIC ADVOCATE, SET I**

The Philadelphia Water Department (“Department” or “PWD”) requests that the Public Advocate provide full and complete answers to the following interrogatories and request for production of documents upon the undersigned.

Interrogatories and Requests for Production to the Public Advocate

**For Public Advocate Witnesses, Lafayette K. Morgan, Jr.:**

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

Response:

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:

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:

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:

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:

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:

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:

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:

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:

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

Response:

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:

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:

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:

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:

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:

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:

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:

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:

Respectfully submitted,

*/s/ Andre C. Dasent*

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