Philadelphia Water Department Reconciliation of the Tiered Assistance Program Rate Rider Surcharge Rates (TAP-R) as of September 1, 2024 Data Requests of the Public Advocate Set 1

PA-TAP 1-1. Refer to the first page of the "Overview of 2024 TAP-R Filing". At the fifth paragraph under the "Projections" heading, it states: "Please note at this point, for purposes of the annual TAP-R adjustment filing, projections assume 2,250 new participants in February, 6,000 new participants in March, and then 12,000 new participants month until the full set has been enrolled and is actively receiving TAP bills and discounts."

On the following page, it is stated that: "In the eight business days since IDEA enrollment began on February 13 and this writing, roughly 12,000 candidates have been enrolled via IDEA prequalification, and will start receiving TAP bills in the coming days. It is anticipated at this time that staff will continue to enroll customers at this high rate, and roughly 34,000 new enrollments are expected by June 2024, regardless of enrollment pace."

- a. Please reconcile the two statements. How is it that PWD's projections can assume 2,250 new participants in February, but, on the other hand, PWD claims that "in the eight business days since IDEA enrollment began on February 13 and this writing, roughly 12,000 candidates have been enrolled via IDEA pregualification."
- b. Please provide the assumptions, analyses and other information, including workpapers, used to derive the 2,250 new participants in February, 6,000 new participants in March, and then 12,000 new participants monthly.
- PA-TAP 1-2. Please provide the actual number of customers who became TAP participants during February 2024 and from March 1st through the most recent date available.
- PA-TAP 1-3. Refer to the "TRR_Projections" tab of Raftelis Excel workpapers for the 2023 TAP Reconciliation Filing and the "TRR_Projections" tab of the Schedule RFC-3 Rate Rider Reporting Model 2024 Excel file in this proceeding.

In the 2023 proceeding, PWD projected the growth in participants in December 2022 and January 2023 to be 5% and 15%, respectively. The "TRR_Projections" tab of the Schedule RFC-3 Rate Rider Reporting Model in this proceeding shows the actual growth rate for those months to be 2.74% and 2.37%. Please provide an explanation for why the growth as projected in the 2023 filing did not occur.

- PA-TAP 1-4. Please explain why participation is modeled to be steady state after the enrollment of the IDEA pre-qualified customer list, and why projections over the next rate period are assumed to remained flat.
- PA-TAP 1-5. Please explain how it is possible for the IDEA initiative to attract and find additional TAP participants.
 - a. What it is it about IDEA that will enable it to sign up additional TAP participants?
 - b. Please provide more details about the IDEA and how it works. Explain the steps in the process from finding eligible customers to when the customers become participants.
- PA-TAP 1-6. Given the historical data since 2021 shows the monthly number of participants fluctuates, please explain why PWD believes a steady state after June 2024 is realistic.
- PA-TAP 1-7. Please provide the assumptions and the supporting calculation (in Excel format) for the projected growth rates from January 2024 through June 2024.
- PA-TAP 1-8. Please provide the complete data set developed in partnership with the City's Office of Integrated Data for Evidence and Action supporting PWD's anticipation of 34,000 or more customers being prequalified for TAP, as described on Schedule RFC-1 (page 1).
- PA-TAP 1-9. With respect to the 34,000 or more customers prequalified for TAP, please identify:
 - a. How many are home owners;
 - b. How many are occupant customers;
 - c. How many are tenant customers; and
 - d. How many are not customers of PWD.
- PA-TAP 1-10. PWD's Overview of 2024 TAP-R Filing reports: "In the eight business days since IDEA enrollment began on February 13 and this writing, roughly 12,000 candidates have been enrolled via IDEA prequalification, and will start receiving TAP bills in the coming days." For TAP customers who have been enrolled via IDEA prequalification please provide a spreadsheet (with all formulae intact) setting forth:
 - a. Each customer's monthly water consumption per month for the most recent 12 months;
 - b. Each customer's monthly sewer consumption per month for the most recent 12 months;
 - c. Each customer's monthly bill amount for each of the most recent 12 months;

- d. Each customer's Senior Discount amount (most recent month); and
- e. Each customer's calculated monthly TAP bill.
- PA-TAP 1-11. Refer to Schedule RFC-3 at 17. Does this report (DR-4) show that amounts associated with the Senior Discount are included within PWD's calculation of the TAP Discount? Please provide a detailed explanation.
- PA-TAP 1-12. Please provide PWD's understanding of why the level of TAP participants declines periodically.
- PA-TAP 1-13. With respect to customers that became TAP participants as part of TAP prequalification for LIHWAP grant recipients:
 - a. Please provide the number of participants that became TAP participants as a result of the TAP pre-qualification for LIHWAP grant initiative.
 - b. Of the number of participants that became TAP participants as a result of the TAP pre-qualification for LIHWAP grant initiative, how many remain as TAP participants?