

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-13

Dated: March 2024

1 **PA-TAP-1.** REFER TO THE FIRST PAGE OF THE “OVERVIEW OF 2024 TAP-R
2 FILING”. AT THE FIFTH PARAGRAPH UNDER THE “PROJECTIONS”
3 HEADING, IT STATES: “PLEASE NOTE AT THIS POINT, FOR PURPOSES
4 OF THE ANNUAL TAP-R ADJUSTMENT FILING, PROJECTIONS ASSUME
5 2,250 NEW PARTICIPANTS IN FEBRUARY, 6,000 NEW PARTICIPANTS IN
6 MARCH, AND THEN 12,000 NEW PARTICIPANTS MONTH UNTIL THE
7 FULL SET HAS BEEN ENROLLED AND IS ACTIVELY RECEIVING TAP
8 BILLS AND DISCOUNTS.”

9
10 ON THE FOLLOWING PAGE, IT IS STATED THAT: “IN THE EIGHT
11 BUSINESS DAYS SINCE IDEA ENROLLMENT BEGAN ON FEBRUARY 13
12 AND THIS WRITING, ROUGHLY 12,000 CANDIDATES HAVE BEEN
13 ENROLLED VIA IDEA PRE-QUALIFICATION, AND WILL START
14 RECEIVING TAP BILLS IN THE COMING DAYS. IT IS ANTICIPATED AT
15 THIS TIME THAT STAFF WILL CONTINUE TO ENROLL CUSTOMERS AT
16 THIS HIGH RATE, AND ROUGHLY 34,000 NEW ENROLLMENTS ARE
17 EXPECTED BY JUNE 2024, REGARDLESS OF ENROLLMENT PACE.”

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19 A. PLEASE RECONCILE THE TWO STATEMENTS. HOW IS IT THAT
20 PWD’S PROJECTIONS CAN ASSUME 2,250 NEW PARTICIPANTS IN
21 FEBRUARY, BUT, ON THE OTHER HAND, PWD CLAIMS THAT “IN
22 THE EIGHT BUSINESS DAYS SINCE IDEA ENROLLMENT BEGAN
23 ON FEBRUARY 13 AND THIS WRITING, ROUGHLY 12,000
24 CANDIDATES HAVE BEEN ENROLLED VIA IDEA PRE-
25 QUALIFICATION.”

26 B. PLEASE PROVIDE THE ASSUMPTIONS, ANALYSES AND OTHER
27 INFORMATION, INCLUDING WORKPAPERS, USED TO DERIVE THE
28 2,250 NEW PARTICIPANTS IN FEBRUARY, 6,000 NEW

1 PARTICIPANTS IN MARCH, AND THEN 12,000 NEW PARTICIPANTS
2 MONTHLY.
3

4 **RESPONSE:**

5 A. Customers enrolled in TAP are TAP “participants” in months they receive a TAP bill.
6 Since customers can be enrolled in TAP after they have received their regular bill for the
7 month, there can be a lag between being enrolled and being considered a participant. (It
8 should still be noted that enrolled customers receive all TAP protections immediately.)
9

10 The Advance Notice contained preliminary projections for February, March, April, and
11 thereafter. Based on what has been experienced to date (and observed in production data),
12 PWD believes that the participation numbers will exceed those projections for February,
13 March, and April, until enrollment of the initial IDEA bulk data set has concluded. Updated
14 data and modeling through the end of February snapshot of basis2 will be made available
15 during the course of discovery. See also the response to (B), below.
16

17 B. IDEA provided WRB with a data set of candidates pre-selected by IDEA for enrollment
18 in TAP and pre-matched to the WRB billing system. Slightly over 34,000 customers in that
19 data set were *not* already TAP participants and could be enrolled. Based on Customer
20 Assistance staff experience with processing LIHWAP pre-qualified enrollments, the readily
21 available IDEA data, and staff capacity, it was assumed that WRB could sustain 12,000 pre-
22 qualification enrollments per month, and as discussed in (A), related increases in
23 participation would appear slightly later because of the monthly billing cycle and the lag
24 between enrollment and participation. It was assumed that half the customers enrolled in the
25 third week of February would be able to get their bill that same month, and a quarter of
26 people enrolled in the fourth week would get a bill that month (in total, 3/16 of all enrolled
27 customers would be participants the same month). It was also assumed that after two
28 months, the number of new participants would start to catch up with the number of new

1 enrollments in any given month. As a result, the participation ramp-up was calculated as
2 follows:

- 3 - February 2024: 3/16 of the monthly enrollment rate
- 4 - March 2024: 1/2 of the monthly enrollment rate
- 5 - April 2024: The full monthly enrollment rate
- 6 - Subsequent months: the full monthly enrollment rate until all candidates have been
7 enrolled.

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9 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-TAP-2.** PLEASE PROVIDE THE ACTUAL NUMBER OF CUSTOMERS WHO
2 BECAME TAP PARTICIPANTS DURING FEBRUARY 2024 AND FROM
3 MARCH 1ST THROUGH THE MOST RECENT DATE AVAILABLE.
4

5 **RESPONSE:**

6 As shown in schedule PA-TAP-2, in February 2024, the total number of TAP Participants
7 (customers receiving a TAP bill) increased by 6,361. Actual numbers of TAP Participants
8 in March will be available later in the proceeding.
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10 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-TAP-3.** REFER TO THE “TRR_PROJECTIONS” TAB OF RAFTELIS EXCEL WORK
2 PAPERS FOR THE 2023 TAP RECONCILIATION FILING AND THE
3 “TRR_PROJECTIONS” TAB OF THE SCHEDULE RFC-3 RATE RIDER
4 REPORTING MODEL 2024 EXCEL FILE IN THIS PROCEEDING.

5
6 IN THE 2023 PROCEEDING, PWD PROJECTED THE GROWTH IN
7 PARTICIPANTS IN DECEMBER 2022 AND JANUARY 2023 TO BE 5% AND
8 15%, RESPECTIVELY. THE “TRR_PROJECTIONS” TAB OF THE
9 SCHEDULE RFC-3 RATE RIDER REPORTING MODEL IN THIS
10 PROCEEDING SHOWS THE ACTUAL GROWTH RATE FOR THOSE
11 MONTHS TO BE 2.74% AND 2.37%. PLEASE PROVIDE AN EXPLANATION
12 FOR WHY THE GROWTH AS PROJECTED IN THE 2023 FILING DID NOT
13 OCCUR.

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15 **RESPONSE:**

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17 The projections of growth in December 2022 and January 2023 were based on the best
18 information available at the time about the timing and data sharing approach of the
19 unprecedented LIHWAP pre-qualification pilot. The growth anticipated in December
20 2022 and January 2023 was realized (and exceeded), although such growth occurred later
21 than anticipated as shown in the actual data. The primary reason for the difference in
22 timing was the delivery of LIHWAP data – which was provided to WRB in March 2023,
23 later than expected.

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25 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-TAP-4.** PLEASE EXPLAIN WHY PARTICIPATION IS MODELED TO BE STEADY
2 STATE AFTER THE ENROLLMENT OF THE IDEA PRE-QUALIFIED
3 CUSTOMER LIST, AND WHY PROJECTIONS OVER THE NEXT RATE
4 PERIOD ARE ASSUMED TO REMAINED FLAT.

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6 **RESPONSE:**

7 At present, the recertification period has been extended to four years, and as a result, few
8 customers are expected to leave the program for failing to recertify. No additional pre-
9 qualification campaigns are known at this time, and though it is anticipated that there will
10 be ongoing monthly enrollment of new customers through IDEA (at significantly reduced
11 levels compared with the initial enrollment), there will also be customers who relocate or
12 otherwise leave the program. There is little known about the rate of account discontinuance,
13 and we assume the net impact – barring policy or process changes – will be steady state
14 participation.

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16 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-TAP-5.** PLEASE EXPLAIN HOW IT IS POSSIBLE FOR THE IDEA INITIATIVE TO
2 ATTRACT AND FIND ADDITIONAL TAP PARTICIPANTS.

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4 A. WHAT IS IT ABOUT IDEA THAT WILL ENABLE IT TO SIGN UP
5 ADDITIONAL TAP PARTICIPANTS?

6 B. PLEASE PROVIDE MORE DETAILS ABOUT THE IDEA AND HOW IT
7 WORKS. EXPLAIN THE STEPS IN THE PROCESS FROM FINDING
8 ELIGIBLE CUSTOMERS TO WHEN THE CUSTOMERS BECOME
9 PARTICIPANTS.

10
11 **RESPONSE:**

12 A. The Office of Integrated Data for Evidence and Action (IDEA), a department in the
13 Managing Director's Office, provided WRB and PWD a data set of water customers who
14 are eligible to be in TAP based on approval for other City-administered low-income
15 assistance or services in the past 12 months. Several City departments worked with IDEA
16 to provide data on benefit recipients, which was then matched to water accounts. This
17 program, through IDEA, is able to sign up additional TAP participants by leveraging these
18 other programs that have already identified eligible customers.

19 B. Building on the steps discussed in (A) above, the IDEA team shares a data set monthly
20 with customer and account information. WRB staff review each record as an "applicant"
21 within their application processing software, confirming installation type, checking usage
22 patterns, and following up on residency as needed, before enrolling customers in TAP. The
23 customer becomes a "participant" in the month when they receive a TAP bill, which is
24 typically the same month or the month after they are enrolled.

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26 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-TAP-6.** GIVEN THE HISTORICAL DATA SINCE 2021 SHOWS THE MONTHLY
2 NUMBER OF PARTICIPANTS FLUCTUATES, PLEASE EXPLAIN WHY
3 PWD BELIEVES A STEADY STATE AFTER JUNE 2024 IS REALISTIC.
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5 **RESPONSE:**

6 Refer to the response provided for PA-TAP-4.
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8 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-TAP-7.** PLEASE PROVIDE THE ASSUMPTIONS AND THE SUPPORTING
2 CALCULATION (IN EXCEL FORMAT) FOR THE PROJECTED GROWTH
3 RATES FROM JANUARY 2024 THROUGH JUNE 2024.
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5 **RESPONSE:**

6 See Schedule RFC-3 and the response to PA-TAP-1 item B for the assumptions (and written
7 formulae). Assumptions are not separately documented or calculated in Excel format.
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9 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-TAP-8.** PLEASE PROVIDE THE COMPLETE DATA SET DEVELOPED IN
2 PARTNERSHIP WITH THE CITY'S OFFICE OF INTEGRATED DATA FOR
3 EVIDENCE AND ACTION SUPPORTING PWD'S ANTICIPATION OF 34,000
4 OR MORE CUSTOMERS BEING PREQUALIFIED FOR TAP, AS
5 DESCRIBED ON SCHEDULE RFC-1 (PAGE 1).
6

7 **RESPONSE:**

8 Please note that PWD has objected to this discovery request.
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10 **RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.
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1 **PA-TAP-9.** WITH RESPECT TO THE 34,000 OR MORE CUSTOMERS PREQUALIFIED
2 FOR TAP, PLEASE IDENTIFY:

- 3 A. HOW MANY ARE HOME OWNERS;
4 B. HOW MANY ARE OCCUPANT CUSTOMERS;
5 C. HOW MANY ARE TENANT CUSTOMERS; AND
6 D. HOW MANY ARE NOT CUSTOMERS OF PWD.

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8 **RESPONSE:**

9 A-C Existing reporting does not distinguish between homeowner/tenant/occupant status.

10 D. All of the customers who were IDEA pre-qualification candidates are customers of PWD.

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12 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-TAP-10.** PWD’S OVERVIEW OF 2024 TAP-R FILING REPORTS: “IN THE EIGHT
2 BUSINESS DAYS SINCE IDEA ENROLLMENT BEGAN ON FEBRUARY 13
3 AND THIS WRITING, ROUGHLY 12,000 CANDIDATES HAVE BEEN
4 ENROLLED VIA IDEA PRE-QUALIFICATION, AND WILL START
5 RECEIVING TAP BILLS IN THE COMING DAYS.” FOR TAP CUSTOMERS
6 WHO HAVE BEEN ENROLLED VIA IDEA PRE-QUALIFICATION PLEASE
7 PROVIDE A SPREADSHEET (WITH ALL FORMULAE INTACT) SETTING
8 FORTH:

- 9 A. EACH CUSTOMER’S MONTHLY WATER CONSUMPTION PER
10 MONTH FOR THE MOST RECENT 12 MONTHS;
11 B. EACH CUSTOMER’S MONTHLY SEWER CONSUMPTION PER
12 MONTH FOR THE MOST RECENT 12 MONTHS;
13 C. EACH CUSTOMER’S MONTHLY BILL AMOUNT FOR EACH OF THE
14 MOST RECENT 12 MONTHS;
15 D. EACH CUSTOMER’S SENIOR DISCOUNT AMOUNT (MOST RECENT
16 MONTH); AND
17 E. EACH CUSTOMER’S CALCULATED MONTHLY TAP BILL.

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19 **RESPONSE:**

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21 The following responses apply to the 5,642 customers who were TAP participants in
22 February 2024 and were enrolled in TAP through the IDEA pre-qualification process. Other
23 IDEA pre-qualified customers enrolled in February but who did not receive a TAP bill in
24 February are not captured in these figures, nor are customers who were enrolled through
25 another means (LIHWAP pre-qualification or a traditional application) at any point in time,
26 regardless of whether they received a TAP bill in February 2024. Information cannot be
27 provided at a customer level, so totals and averages are provided throughout:
28

1 A. Average water billed usage (in cubic feet) for each month, March 2023 through February
2 2024:

3 Mar-23	566
4 Apr-23	471
5 May-23	450
6 Jun-23	579
7 Jul-23	579
8 Aug-23	487
9 Sep-23	549
10 Oct-23	498
11 Nov-23	515
12 Dec-23	519
13 Jan-24	580
14 Feb-24	542

15 B. Average sewer billed usage (in cubic feet) for each month, March 2023 through February
16 2024:

17 Mar-23	566
18 Apr-23	471
19 May-23	450
20 Jun-23	578
21 Jul-23	578
22 Aug-23	486
23 Sep-23	549
24 Oct-23	497
25 Nov-23	514
26 Dec-23	518
27 Jan-24	580
28 Feb-24	542

1 C. Average total monthly bill for each month, March 2023 through February 2024:

2 Mar-23	\$82.85
3 Apr-23	\$68.86
4 May-23	\$66.99
5 Jun-23	\$79.34
6 Jul-23	\$79.71
7 Aug-23	\$70.12
8 Sep-23	\$79.32
9 Oct-23	\$77.74
10 Nov-23	\$79.44
11 Dec-23	\$79.59
12 Jan-24	\$85.39
13 Feb-24	\$55.36

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15 D. Total Senior Citizen Discount amount for February 2024: \$13,645.03

16 E. Average monthly TAP bill, as calculated based on income (presumed at 133% FPL):
17 \$54.42. Note that actual bill amount may vary if current usage and service charges are lower
18 than the calculated TAP amount, or if there are additional charges not related to current
19 service and usage (such as bad check fees).

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23 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

1 **PA-TAP-11.** REFER TO SCHEDULE RFC-3 AT 17. DOES THIS REPORT (DR-4) SHOW
2 THAT AMOUNTS ASSOCIATED WITH THE SENIOR DISCOUNT ARE
3 INCLUDED WITHIN PWD'S CALCULATION OF THE TAP DISCOUNT?
4 PLEASE PROVIDE A DETAILED EXPLANATION.

5
6 **RESPONSE:**

7 DR-4 shows TAP Discounts received by customers who receive the Senior Citizen
8 Discount. Customers who are enrolled in both programs receive a Senior Citizen Discount
9 first, then a further adjustment to their TAP bill amount, if necessary. The discounts related
10 to each program are counted only once, and Senior Citizen Discounts are not included in
11 the cost of the TAP program or TAP rate rider calculations.

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13 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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1 **PA-TAP-12.** PLEASE PROVIDE PWD'S UNDERSTANDING OF WHY THE LEVEL OF
2 TAP PARTICIPANTS DECLINES PERIODICALLY.

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4 **RESPONSE:**

5 See the response provided for PA-TAP-4. In the past, customers have been asked to recertify
6 in TAP, and failure to recertify was the most significant reason participation declined. The
7 recertification cycle is currently set to four years by policy, so that is not impacting
8 participation at present. In addition, customers not issued a TAP bill during a calendar
9 month are not counted during the month in question, which can affect the number of TAP
10 participants if calendar months are shorter than usual.

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12 **RESPONSE PROVIDED BY:** Water Revenue Bureau and Raftelis Financial Consultants, Inc.

1 **PA-TAP-13.** WITH RESPECT TO CUSTOMERS THAT BECAME TAP PARTICIPANTS AS
2 PART OF TAP PRE-QUALIFICATION FOR LIHWAP GRANT RECIPIENTS:

3 A. PLEASE PROVIDE THE NUMBER OF PARTICIPANTS THAT
4 BECAME TAP PARTICIPANTS AS A RESULT OF THE TAP PRE-
5 QUALIFICATION FOR LIHWAP GRANT INITIATIVE.

6 B. OF THE NUMBER OF PARTICIPANTS THAT BECAME TAP
7 PARTICIPANTS AS A RESULT OF THE TAP PRE-QUALIFICATION
8 FOR LIHWAP GRANT INITIATIVE, HOW MANY REMAIN AS TAP
9 PARTICIPANTS?
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11 **RESPONSE:**

12 A. 3,164 customers became TAP participants as part of the LIHWAP pre-qualification
13 initiative.

14 B. 3,000 of the customers from (A) remain TAP participants.
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16 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.
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