

**BEFORE THE  
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD**

In the Matter of the Philadelphia Water :  
Department's Proposed Changes in Water and : 2024 TAP-R Reconciliation  
Sewer Rates and Related Charges : Proceeding – FY 2025

**Philadelphia Large Users Group's ("PLUG")  
Interrogatories & Requests for Production of Documents  
To the Philadelphia Water Department ("PWD")**

Pursuant to the Hearing Officer's Procedural Rules for this Rate Proceeding, the Philadelphia Large Users Group's ("PLUG") requests that the Philadelphia Water Department ("PWD") provide full and complete answers to the following interrogatories with seven (7) calendar days of service hereof.

**Instructions and Definitions**

1. Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession and control or custody of the Public Advocate or its consultants.
2. Each answer shall restate the question and identify the name and affiliation of the individual answering the interrogatory.
3. Copies of all answers shall be provided in PDF and/or XLS format via email.
4. Answers to these interrogatories and requests for production of documents shall be made in accordance with the Hearing Officer's Procedural Rules applicable to this rate proceeding.

**Interrogatories**

- PLUG-PWD-1 Please explain whether any cost cap, budget, or other mechanism limits the annual costs recovered from non-Tiered Assistance Program ("TAP") customers through the proposed TAP rider.
- PLUG-PWD-2 Please confirm that the TAP is available to customer with household income within 150% of the Federal Poverty Guidelines.
- PLUG-PWD-3 The Formal Notice filed with the Rate Board on April 1, 2024, confirms the projected TAP-R rates effective September 1, 2024, assume program enrollment of 34,000 by June 2024. Please confirm whether PWD has adjusted this projection.

- PLUG-PWD-4 The Formal Notice filed with the Rate Board on April 1, 2024, projects program enrollment of 56,000 by June 2024, based on enrollment of 34,000 new participants from January 2024 to June 2024. Please confirm whether the projected 56,000 participations represent the maximum possible enrollment potential under the program.
- PLUG-PWD-5 If the answer to PLUG-PWD-4 is anything other than an unqualified “yes” please provide the maximum potential enrollment of TAP participants based on currently eligibility criteria and income data.
- PLUG-PWD-6 To the extent not provided in response to No. 5 above, please provide PWD’s best estimate of the maximum potential enrollment of TAP participants based on currently eligibility criteria and income data.
- PLUG-PWD-7 Provide a calculation of the proposed September 1, 2024, water and sewer TAP-R rates assuming the following:
- i. TAP-R enrollment at the maximum potential enrollment level identified in response to PLUG-PWD-5.
  - ii. TAP-R enrollment at the estimated maximum potential level enrollment identified in response to PLUG-PWD-6.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

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