

BEFORE THE
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

Philadelphia Water Department's Proposed Changes in Rates and Charges	2024 TAP-R Adjustment Proceeding
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**PHILADELPHIA WATER DEPARTMENT'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
SET I (Morgan)**

Pursuant to the Hearing Officer's Procedural Rules for this Rate Proceeding, 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 with seven calendar days of the service hereof.

Instructions and Definitions

1. Each interrogatory and request for production shall be answered fully and completely by those officers, employees or agents of the Public Advocate who may be cognizant of the requested information and who are authorized to answer on behalf of Public Advocate. 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 person or persons who prepared the answer or who is responsible for the information contained therein.

3. Please attach written or electronic material and documents to any answer for which written or electric material and documents are requested and/or available. If such written or electronic materials and documents are not available, state where it may be obtained. Label the material and documents with the number of the interrogatory to which it pertains. Copies of all answers shall be provided in PDF and/or Excel (.xlsx or .xls) format via email. Excel spreadsheets shall be provided with data and formulae intact.

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 proceeding.

5. These interrogatories and requests for documents are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete. PWD reserves the right to propound additional interrogatories and to request additional documents as and if additional information is required.

6. For purposes of the following requests, "Public Advocate" or "PA" means and includes Community Legal Services, Inc. and any person, agency or corporation whom either of them has engaged for purposes of this proceeding.

Interrogatories and Requests for Production

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

2. Please provide the electronic workpapers (Excel) supporting the analysis described in the Direct Testimony of Lafayette K. Morgan, Jr., (dated April 29, 2024) at page 5.
3. Please provide the total change in the number of TAP participants projected by Mr. Morgan between December 2023 (21,500) and August 2025.
4. Please provide the monthly TAP participation levels and estimated TAP discounts used by Mr. Morgan for the following months:
 - a. December 2023
 - b. January 2024
 - c. February 2024
 - d. March 2024
 - e. April 2024
 - f. May 2024
 - g. June 2024
 - h. July 2024
 - i. August 2024
 - j. September 2024
 - k. October 2024
 - l. November 2024
 - m. December 2024
 - n. January 2025
 - o. February 2025
 - p. March 2025
 - q. April 2025
 - r. May 2025
 - s. June 2025
 - t. July 2025
 - u. August 2025.
5. Please provide monthly TAP water sales and sewer volume used in Schedule LKM TAP-R-3.
6. Does Mr. Morgan agree that that the highest number of monthly TAP participants was 49,658 in March 2024 as shown in Schedule RFC-3 (updated)? If Mr. Morgan does not agree, please state the basis for Mr. Morgan's disagreement.
7. Does Mr. Morgan agree that there are eligible TAP participants who will not have been enrolled in TAP as of April 2024? Please explain why or why not.

8. Does Mr. Morgan have a projected maximum TAP enrollment estimate? If not, please explain why calculating an exact maximum TAP enrollment number is not possible.
9. Please explain in detail the basis for Mr. Morgan's 5% adjustment on page 8 of his testimony (hereafter 5% adjustment) reducing TAP enrollments by five percent.
10. Please explain if the above referenced 5% adjustment is based upon the assumption that the pre-qualification of TAP enrollees from the LIHWAP and IDEA programs are analogous?
11. With reference to the above referenced 5% adjustment, please provide the basis for the following statement on page 8 of Mr. Morgan's testimony: "The result of this adjustment is an additional reduction of \$430,005 to the TAP-R for the next rate period." If there is a supporting calculation for the above statement, please provide the supporting electronic workpapers (Excel) with formulas intact and corresponding source data used in the analysis.
12. Please confirm whether or not the above projected enrollment level (34,000 enrollees in connection with IDEA data sharing) has been changed in the 2024 TAP-R filing?
13. Please confirm or deny that new TAP enrollments based on IDEA data sharing reached 34,670 on April 24, 2024?
14. Please confirm or deny that there are still 13,770 accounts provided in connection with IDEA data sharing are being reviewed by WRB.
15. Please confirm or deny that the approval rate for new accounts in connection with IDEA data sharing has exceeded 90%.
16. Please explain the bases for applying your attrition adjustment without accounting for the likelihood of new TAP enrollees through customer-initiated applications.
17. Please provide a template for the correspondence Mr. Morgan suggests that PWD send to new IDEA pre-qualified TAP enrollees.
18. With reference to pages 7- 8 of Mr. Morgan's testimony (536.65 cf), please provide the supporting documentation for the following statement: "...IDEA pre-qualified customers show these customers utilize on average 536.65 ccf of water per month." If there is a supporting calculation for the above statement,

please provide the supporting electronic workpapers (Excel) with formulas intact and corresponding source data used in the analysis.

19. With reference to page 8 of Mr. Morgan’s testimony, please provide the supporting documentation for the following statement: “IDEA pre-qualified TAP participants will receive a monthly \$20.906 TAP discount.” If there is a supporting calculation for the above statement, please provide the supporting electronic workpapers (Excel) with formulas intact and corresponding source data used in the analysis.

Respectfully submitted,

/s/ Andre C. Dasent

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