

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 3

- PA-3-1. Reference page 9 of PWD’s rebuttal testimony (“Mr. Morgan’s proposals will contribute to a significant underfunding of the Department and place additional pressures on financial reserves.”). Has PWD estimated the underfunding associated with Mr. Morgan’s projected number of TAP participants? If so, please provide that estimate, on a stand-alone basis together with all supporting workpapers in Excel format with formulae intact.
- PA-3-2. Reference page 13 of PWD’s rebuttal testimony (“The average bills provided in response to PA TAP 1-10 C and PA TAP 2-3 C already reflected the senior discounts.”). Does this mean that no IDEA prequalified customers were newly enrolled in the Senior Discount Program through prequalification? Please explain specifically whether this applies across each month in the 12-month periods referenced in PA-I-10 and PA-II-3.
- PA-3-3. Please update the response to PA-I-10(c) by providing the average total monthly bill for the 5,642 customers referenced for February 2023.
- PA-3-4. Please update the response to PA-II-3(c) by providing the average total monthly bill for the 26,566 customers referenced for March 2023.
- PA-3-5. Reference page 11 of PWD’s rebuttal testimony and Rebuttal-Exhibit-RFC-1.xls, “Summary” tab. Please explain why the data for the Average TAP Discount per IDEA Participant is consider “simulated.” Please provide an explanation of how the simulated calculation was performed and provide the supporting calculations in electronic format with the formulae intact.
- PA-3-6. Reference page 12, lines 4 and 5 of PWD’s rebuttal testimony. Please show the calculation of the TAP Discounts of \$60.86 and \$40.69.
- PA-3-7. Please provide the “live” version of Rebuttal-Exhibit-RFC-1.xls with all formulae intact.
- PA-3-8. Reference page 14 of PWD’s rebuttal testimony. (“Second, the factors that are used to calculate the average TAP discount could change. TAP customers’ water and sewer billed volume could increase, as there is no price signal to TAP customers to promote conservation once they surpass the level of consumption where their regular bill would be more affordable.”). Please explain how PWD accounted for this potential variable in its calculations.

PA-3-9. Reference page 14 of PWD's rebuttal testimony. ("Second, the factors that are used to calculate the average TAP discount could change. TAP customers' water and sewer billed volume could increase, as there is no price signal to TAP customers to promote conservation once they surpass the level of consumption where their regular bill would be more affordable."). Please explain any efforts PWD is taking through its LICAP program or otherwise to reduce and/or manage TAP participant water volumes.

PA-3-10. Reference page 14 of PWD's rebuttal testimony. ("Last, the monthly average discount has varied month to month for TAP customers in the past, and there are many reasons to expect that it will continue to vary moving forward. The number of TAP participants may go up, and discounts may go down, which could work in opposite directions, while Mr. Morgan's calculated average discount represents an erroneous and understated average discount.") Please explain how PWD accounted for this potential variable in its calculations.