

BEFORE THE
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

Re: Philadelphia Water Department Proposed Charges in Rates and Charges	2025 TAP-R Adjustment Proceeding
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**PHILADELPHIA WATER DEPARTMENT'S
INFORMATION REQUESTS
TO THE PUBLIC ADVOCATE, SET II**

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 (collectively, “information requests”) upon the undersigned.

Information Requests to the Public Advocate

For Public Advocate Witness, Lafayette K. Morgan, Jr.:

1. Please provide the justification and supporting calculations for using -0.08% as the average monthly growth rate applied to monthly TAP participation.
2. Please describe how the Public Advocate accounts for rate changes to water and sewer rates when applying his recommended approach to calculating the average TAP discount per participant based on the most recent 12-months of available data.
3. Please confirm that Mr. Morgan’s recommended average TAP discount per participant is based only on the most recent 12-months of available data. If Mr. Morgan’s recommended average TAP discount per participant is adjusted for other factors, please describe them in detail.

4. Confirm or deny: The most reliable method for calculating TAP participation and participant discount values is to base the analysis on the most recent known and measurable data available. If your response is anything other than an unqualified “confirm,” please provide a detailed explanation and reasoning for the response.

Respectfully submitted,

/s/ Andre C. Dasent

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Dated: April 24, 2025

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