

BEFORE THE  
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

Philadelphia Water Department's Proposed Changes in Rates and Charges	2025 TAP-R Adjustment Proceeding
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**PUBLIC ADVOCATE RESPONSES TO  
PHILADELPHIA WATER DEPARTMENT'S  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
SET I (Morgan)**

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

Response:

See attached Excel workbook "2025-PA Modified TAP-Rate-Rider-Recon."

Responsible witness: Lafayette K. Morgan, Jr.

2. Please provide the electronic workpapers (Excel) supporting the analysis described in the Direct Testimony of Lafayette K. Morgan, Jr., (dated April 21, 2025). Please include any adjustments made to the baseline Raftelis model to serve as an input into his analysis.

Response:

See attached Excel workbook "2025 PA Modified Schedule-RFC-3"

Responsible witness: Lafayette K. Morgan, Jr.

3. Please provide the monthly TAP participation levels, estimated TAP discounts, and estimated TAP water consumption used by Mr. Morgan for the following months:

- a. December 2024
- b. January 2025
- c. February 2025
- d. March 2025

- e. April 2025
- f. May 2025
- g. June 2025
- h. July 2025
- i. August 2025
- j. September 2025
- k. October 2025
- l. November 2025
- m. December 2025
- n. January 2026
- o. February 2026
- p. March 2026
- q. April 2026
- r. May 2026
- s. June 2026
- t. July 2026
- u. August 2026

Response:

See Excel workbook provided in response to I-2 (tab “TRR\_Projections”).

Responsible witness: Lafayette K. Morgan, Jr.

4. Refer to the Page 10 Lines 4 to 17 of Mr. Morgan’s testimony. Please clearly state the number of participants, average discount, and average TAP water usage proposed by Mr. Morgan and as reflected in his schedules. Please provide the derivation for both factors (formulas intact).

Response:

Page 10, lines 4 to 17, of my testimony address PWD’s proposed use of a three-month period to calculate average TAP discounts and explains my disagreement with this approach. The number of participants, average discount and average TAP water usage supporting my testimony are reflected in the Excel workbook supplied in response to I-2.

Responsible witness: Lafayette K. Morgan, Jr.

5. Confirm or deny that customers enrolled in TAP receive a bill based upon their income levels and not their actual pre-TAP discount bill.

Response:

Confirmed.

Responsible witness: Lafayette K. Morgan, Jr.