

**RESPONSE TO**  
**PUBLIC ADVOCATE'S INTERROGATORIES (TAP SET 3)**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**QUESTIONS 1-5**

**Dated: May 2025**

**PA-TAP 3-1** REFERENCE PWD TAP REBUTTAL STATEMENT 1, PAGE 6. DOES PWD EXPECT A SIGNIFICANT (4% OR GREATER YEAR OVER YEAR) INCREASE IN NEW ENROLLMENTS THROUGH IDEA? IF YES, PLEASE PROVIDE THE SUPPORTING BASIS.

**RESPONSE:**

The Department acknowledges there is potential for additional TAP participants in the Next Rate Period. We do not have a formal disclosure from the City's Office of Integrated Data for Evidence and Action (IDEA) to share in response to this information request.

**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

**PA-TAP 3-2** REFERENCE PWD TAP REBUTTAL STATEMENT 1, PAGE 6, LINE 23. IF A STEADY INCREASE IS ANTICIPATED, WHAT ACCOUNTS FOR THE NEGATIVE CHANGE IN PARTICIPANTS THAT WERE INITIALLY PROJECTED DURING THE PERIOD DECEMBER 2024 TO SEPTEMBER 2025?

**RESPONSE:**

As presented in Schedule RFC-3 with actuals through November 2024, the Department projected an increase in TAP participation during the period December 2024 to September 2025. In PA-I-1, the Department provided a detailed explanation of month-to-month variations in projected TAP participation in respect to Schedule RFC-3.

An updated version of the model with actuals through March 2025, provided as Schedule RFC-4 in our rebuttal testimony, provides a simplified outlook of steady participation, as described on page 7 of our rebuttal testimony.

**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

**PA-TAP 3-3** CONFIRM OR DENY: PWD’S POSITION IS THAT THE AGGREGATE AMOUNT OF TAP-R DISCOUNTS INCREASES WHEN BASE RATES INCREASE.

**RESPONSE:**

Deny. Total (or “aggregate”) TAP discounts in a given month depend upon several independent factors that include the number of participants, the income profile of participants, the usage of participants, and base rates.

**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

**PA-TAP 3-4** REFERENCE SCHEDULE RDC-4, PLEASE CONFIRM OR EXPLAIN WITH SPECIFICITY ANY DISAGREEMENT WITH THE FOLLOWING STATEMENTS:

- A. THE AVERAGE DISCOUNT PROVIDED TO TAP-R PARTICIPANTS FROM JANUARY 2021- AUGUST 2021 WAS \$46.71.
- B. THE AVERAGE DISCOUNT PROVIDED TO TAP-R PARTICIPANTS FROM SEPTEMBER 2021-AUGUST 2022 WAS \$49.19.
- C. THE AVERAGE DISCOUNT PROVIDED TO TAP-R PARTICIPANTS FROM SEPTEMBER 2022-AUGUST 2023 WAS \$53.04.
- D. THE AVERAGE DISCOUNT PROVIDED TO TAP-R PARTICIPANTS FROM SEPTEMBER 2023-AUGUST 2024 WAS \$50.27.
- E. THE AVERAGE DISCOUNT PROVIDED TO TAP-R PARTICIPANTS FROM SEPTEMBER 2024-MARCH 2025 WAS \$53.50.

**RESPONSE:**

A-C, E: Confirm (with reference to Schedule RFC-4).

D: The average discount provided to TAP participants from September 2023-August 2024, as shown in Schedule RFC-4, was not \$50.27.

**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.

**PA-TAP 3-5** REFERENCE SCHEDULE RDC-4, PLEASE CONFIRM OR EXPLAIN WITH SPECIFICITY ANY DISAGREEMENT WITH THE FOLLOWING STATEMENTS:

- A. THE AVERAGE DISCOUNT PROVIDED TO TAP-R PARTICIPANTS FROM SEPTEMBER 2021-FEBRUARY 2022 (FIRST SIX MONTHS OF THE RATE PERIOD) WAS \$50.45.
- B. THE AVERAGE DISCOUNT PROVIDED TO TAP-R PARTICIPANTS FROM MARCH 2022- AUGUST 2022 (THE SECOND SIX MONTHS THE RATE PERIOD) WAS \$47.40.
- C. THE AVERAGE DISCOUNT PROVIDED TO TAP-R PARTICIPANTS FROM SEPTEMBER 2022-FEBRUARY 2023 (FIRST SIX MONTHS OF THE RATE PERIOD) WAS \$54.42.
- D. THE AVERAGE DISCOUNT PROVIDED TO TAP-R PARTICIPANTS FROM MARCH 2023- AUGUST 2023 (THE SECOND SIX MONTHS OF THE RATE PERIOD) WAS \$51.91.
- E. THE AVERAGE DISCOUNT PROVIDED TO TAP-R PARTICIPANTS FROM SEPTEMBER 2023-FEBRUARY 2024 (FIRST SIX MONTHS OF THE RATE PERIOD) WAS \$58.35.
- F. THE AVERAGE DISCOUNT PROVIDED TO TAP-R PARTICIPANTS FROM MARCH 2024- AUGUST 2024 (THE SECOND SIX MONTHS OF THE RATE PERIOD) WAS \$41.96.

**RESPONSE:**

Confirm (with reference to Schedule RFC-4).

**RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.