

**BEFORE THE
PHILADELPHIA WATER, SEWER, AND STORM WATER RATE BOARD**

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater, and Stormwater Rates and Related Charges	Fiscal Years 2026 – 2027 Rates and Charges to Become Effective : September 1, 2025 and September 1, 2026
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**PUBLIC ADVOCATE RESPONSES TO
PHILADELPHIA WATER DEPARTMENT'S
INFORMATION REQUESTS
SET V**

PWD-PA-V-1. With reference to PA Statement 3 (hereafter, “your testimony”) at page 46: Please provide the basis for each of the following factors included in your proposed Conservation Adjustment for the TAP-R formula: A. 0.12 factor (or 12%) “equal to the percentage of TAP Participants to be treated by PWD with conservation”. B. 1.25 “adjustment to average monthly TAP credits to reflect PWD’s agreement in the 2024 TAP-R settlement to focus conservation on high use TAP participants”. C. 0.15 factor (or 15%) “percentage usage reduction expected to be achieved through the conservation which PWD agreed in the 2024 TAP-R settlement to deliver”.

RESPONSE:

The proposed factors identified in the question were developed based on industry standards (e.g., defining “high use”) and professional experience.

RESPONSIBLE WITNESS:

Roger D. Colton

PWD-PA-V-2. Given that TAP-R is a reconcilable rate rider, please explain how your proposed Conservation Adjustment factor will be reconciled in future TAP-R rate proceedings. Please specify how the factors/components of the Conservation Adjustment factor will be reconciled.

RESPONSE:

As explained in Mr. Colton’s testimony, the Conservation Adjustment factor becomes an element of the TAP-Rider that will be calculated at the time of the TAP-Rider proceeding.

RESPONSIBLE WITNESS:

Roger D. Colton

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PWD-PA-V-3. With reference to your testimony at page 46: Please provide an illustrative application of your proposed revised TAP-R formula based on the 2026 TAP-R proceeding. Please include all calculations with formulae intact.

RESPONSE:

A calculation has not been made based on the 2026 TAP-R proceeding and Mr. Colton's testimony does not propose any modifications to the TAP-R other than the inclusion of the "CA" factor. An illustrative calculation of the CA factor is provided as Attachment PWD-PA-V-3. (Note that this illustration does not modify any of the positions the Public Advocate or its witnesses have taken in ongoing proceedings.)

RESPONSIBLE WITNESS:

Roger D. Colton

PWD-PA-V-4. With reference to your testimony at page 46: Please provide the basis for the utilization of the 2nd water rate block rate in the proposed Conservation Adjustment.

RESPONSE:

Use of the second water rate block was used in that the water consumption expected to be saved would otherwise fall in the second block.

RESPONSIBLE WITNESS:

Roger D. Colton

PWD-PA-V-5. With reference to Table 7 of your testimony at page 56, please confirm or deny that the data presented as zeros for March 2025 to June 2025 is future data which is

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not available at this time and that zero should be interpreted as a null (no information available). If denied, please explain your basis for this denial.

RESPONSE:

At the Table indicates, the data presented for FY2025 is year-to-date through February 28, 2025.

RESPONSIBLE WITNESS:

Roger D. Colton