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July 8, 2025

VIA E-MAIL

Sonny Popowsky, Chairman
Philadelphia Water, Sewer and Storm Water Rate Board ("Rate Board")

RE: In the Matter of the Philadelphia Water Department's Proposed Changes in Water, Sewer and Storm Water Rates and Related Charges; 2025 General Rate Proceeding for Fiscal Years 2026-2027

Dear Chairman Popowsky:

The Philadelphia Large Users Group ("PWD") hereby submits this brief letter in lieu of exceptions to the July 1, 2025, Hearing Officer's Report. PLUG generally concurs with the Hearing Officer's Report. This letter addresses only the recommendation that the Rate Board deny PLUG's proposals to reject PWD's modifications to the eligibility requirements for PWD's Charitable Discount program on grounds the proposed Charity Rate Regulations do not alter rates. See Hearing Officer Report at 42. As detailed in PLUG's Main and Reply Briefs, the proposed eligibility changes for the Charity Rate discount impact rates because the revenue proposals presented by PWD in the rate proceeding assume eligible customers receive the Charity Rate discount. See PLUG Main Brief at 8, see PLUG Reply Brief at 4. Accordingly, the Rate Board should adopt PLUG's recommendation and require PWD to develop customer protections to ensure its authority to remove customers from the Charitable Rate discount is not arbitrarily applied to increase rates paid by such customers.

Respectfully,

A handwritten signature in black ink, appearing to read 'Adeolu A. Bakare'.

Adeolu A. Bakare
MCNEES WALLACE & NURICK LLC

c: Sonny Popowsky
Daniel Cantú-Hertzler
Ryan McSherry
Deland Bryant
Ed Markus
Marlane Chestnut
Rate Case Parties of Record