

**RESPONSE TO**  
**PUBLIC ADVOCATE'S INTERROGATORIES (TAP SET 1)**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**QUESTIONS 1-6**

**Dated: February 2026**

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**PA-TAP 1-1** PLEASE PROVIDE THE TOTAL PARTICIPANTS, TOTAL DISCOUNTS, TOTAL TAP WATER CONSUMPTION (CCF) AND TOTAL TAP SEWER CONSUMPTION (CCF) FOR DECEMBER 2024, JANUARY 2025, FEBRUARY 2025, AND MARCH 2025, IN THE FORMAT OF THE TABLE TRR-PROJECTIONS IN PWD-5.

**RESPONSE:**

The requested data is provided in the Reconciliation Workbook included with the Advance Notice and included in the Customer Tab. Please see Lines 8, 11, 21 and 46 of the referenced worksheet. These data are re-presented in Attachment PA-TAP-1-1, in the same format as the PWD-5 TRR Projections.

**RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC and Raftelis Financial Consultants, Inc.

1 **PA-TAP 1-2** REFER TO PWD-5 RATE RIDER REPORTING MODEL, TRR\_SUMMARY  
2 TAB. PLEASE EXPLAIN WHY THE CALCULATION OF THE MONTHLY  
3 CONSUMPTION PER TAP PARTICIPANT OF 661CF IS LIMITED TO THE  
4 PERIOD SEPTEMBER 2025 TO DECEMBER 2025 INSTEAD OF THE  
5 ENTIRE YEAR.

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7 **RESPONSE:**

8 The calculation of monthly consumption per TAP participant is limited to the Most Recent  
9 Period actual data (September 2025 to December 2025) as it best balances the current  
10 participant profile with the use of several months' worth of data and focuses on the period  
11 in which current rates are in place. Average usage in a single month may not be reliable  
12 for projections on its own; data from several months are preferable. If you look much  
13 further back in time, however, the profile of TAP participants (and their usage) becomes  
14 more different from current program enrollment. While the customer profile may change  
15 into the future; relatively recent data is the best predictor.

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17 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-TAP 1-3** IN THE 2025 GENERAL RATE DETERMINATION, THE BOARD  
2 APPROVED A SETTLEMENT TERM PURSUANT TO WHICH PWD WOULD  
3 CONDUCT A COST-BENEFIT ANALYSIS OF LOW INCOME  
4 CONSERVATION ASSISTANCE PROVIDED BY PWD. WHAT IS THE  
5 STATUS OF THE COST-BENEFIT ANALYSIS AND WHEN DOES PWD  
6 EXPECT TO PROVIDE THAT ANALYSIS?

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8 **RESPONSE:**

9 This analysis is underway, and PWD will provide the results by the next General Rate  
10 Proceeding.

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12 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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**PA-TAP 1-4** FOR THE MOST RECENT 3 MONTHS AVAILABLE, PLEASE PROVIDE A DISTRIBUTION OF TAP PARTICIPANTS BY MONTHLY USAGE IN THE FOLLOWING INCREMENTS: 0-2 CCF, 2-4 CCF, 4-6 CCF, 6-8 CCF, 8-10 CCF, 10-15 CCF, 15-20 CCF, >20 CCF.

**RESPONSE:**

The following table provides participants by month within each usage bucket. Please note that a participant is a unique customer receiving a TAP bill, and some TAP customers may receive more than one bill in a month, so totals here may be higher than unique participants reported. As requested, several usage values fell into more than one category. The categories below are revised to avoid any overlap. Usage is billed in integer CCFs.

	Oct-25	Nov-25	Dec-25
<0-2 CCF	18,578	14,735	17,668
3-4 CCF	18,911	14,676	18,102
5-6 CCF	15,089	11,310	14,322
7-8 CCF	9,193	6,520	8,969
9-10 CCF	5,135	3,731	4,990
11-15 CCF	4,767	3,383	4,654
16-20 CCF	1,371	929	1,248
21+ CCF	2,003	1,364	1,870

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

1 **PA-TAP 1-5** PLEASE PROVIDE THE SUPPORTING DOCUMENTATION AND  
2 CALCULATIONS SHOWING THE DERIVATION OF THE .25% MONTHLY  
3 INCREASE IN PARTICIPANTS.  
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5 **RESPONSE:**

6 Changes in participation in prior months are related to both enrollment and the way billing  
7 cycles/days fall throughout the month. Projected increase in enrollment is a simplified  
8 forward-looking estimate, assuming a lower percentage increase month-over-month than  
9 the recent average of just under .5%. This recent average is calculated as the difference  
10 between December participation (67,815) and September Participation (66,827), an  
11 increase of 988 participants or a total of .147% over three months. This averages out to  
12 .49% monthly. We anticipate that growth in participation will slow down further over the  
13 next period, such that the average rate of increase would settle to about .25% monthly.  
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16 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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1 **PA-TAP 1-6** FOR THE MOST RECENT CALENDAR YEAR, WHAT PERCENTAGE OF  
2 NEW TAP PARTICIPANTS ARE ENROLLED THROUGH IDEA VERSUS  
3 PWD'S TRADITIONAL ENROLLMENT?  
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5 **RESPONSE:**

6 During 2025, 66% of TAP enrollees were enrolled through IDEA prequalification, and  
7 33% were enrolled through PWD's traditional application methods (web, mailed, or in  
8 person submittal).  
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10 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc.  
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