

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

Formal Notice of Proposed Changes in :
Rates and Charges; Annual Adjustment of :
Assistance Program Rate Rider Surcharge : **FY 2027**
Rates (TAP-R); Final Proposed TAP-R :
Reconciliation Statement :

**Philadelphia Large Users Group's ("PLUG")
Set I Interrogatories & Requests for Production of Documents
To the Philadelphia Water Department ("PWD")**

Pursuant to the Regulations of the Philadelphia Water, Sewer, and Storm Water Rate Board for this TAP-R annual reconciliation proceeding, the Philadelphia Large Users Group's ("PLUG") requests that the Philadelphia Water Department ("PWD") provide full and complete answers to the following interrogatories.

Instructions and Definitions

1. Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession and control or custody of PWD or its consultants.
2. Each answer shall restate the question and identify the name and affiliation of the individual answering the interrogatory.
3. Copies of all answers shall be provided in PDF and/or XLS format via email.

Interrogatories

- PLUG-PWD I-1 Confirm whether PWD believes the cost impact of the TAP-R rider on non-TAP customers is a public policy concern.
- PLUG-PWD I-2 Confirm what measures PWD has undertaken to minimize the costs of the TAP-R discounts recovered from non-TAP customers.
- PLUG-PWD I-3 Provide a table showing, for each calendar year 2020-2025, by dollar and percentage, the annual TAP-R discounts recovered from each of the below customer classes:
- a. Residential
 - b. Senior Citizens
 - c. Commercial
 - d. Industrial
 - e. Public Utilities
 - f. Housing Authority

- g. Charities and Schools
- h. Hospitals and Universities
- i. Hand Billed
- j. Scheduled (Flat Rate)
- k. Private Fire Protection
- l. Public Fire Protection.


PLUG-PWD I-4 Confirm the maximum number of eligible TAP participants.

PLUG-PWD I-5 If the response to No. 4 is not available, provide PWD's best estimate of the maximum number of eligible TAP participants.

PLUG-PWD I-6 Provide a recalculation of the proposed TAP-R to become effective on September 1, 2026, adjusted to reflect maximum enrollment.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By 

Adeolu A. Bakare (I.D. No. 208541)
Matthew L. Garber (I.D. No. 322855)
Victoria A. Geddis (I.D. No. 335500)
100 Pine Street
Harrisburg, PA 17101
Phone: (717) 232-8000
abakare@mcneeslaw.com
mgarber@mcneeslaw.com
vgeddis@mcneeslaw.com

Counsel to Philadelphia Large Users Group

Dated: April 1, 2026