

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES (TAP SET 2)
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-6

Dated: April 2026

1 **PA-TAP 2-1** PLEASE UPDATE RATE RIDER RECONCILIATION WORKBOOK TO
2 INCORPORATE ACTUAL DATA (PARTICIPANTS, DISCOUNTS, NON-TAP
3 VOLUMES, ETC.) FOR JANUARY, FEBRUARY AND MARCH 2026.

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5 **RESPONSE:**

6 The Department has objected to this information request. PWD and the Advocate are
7 trying to resolve the pending discovery dispute.

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9 **RESPONSE PROVIDED BY:** Philadelphia Water Department

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- 1 **PA-TAP 2-2** PLEASE PROVIDE THE FOLLOWING INFORMATION BY YEAR.
2 A. FOR EACH OF THE PAST THREE MOST RECENT FISCAL YEARS,
3 THE ACTUAL LICAP EXPENDITURES DISAGGREGATED BY
4 WATER CONSERVATION AND LEAK REPAIR ASSISTANCE.
5 B. FOR THE CURRENT FISCAL YEAR (YEAR-TO-DATE), THE
6 BUDGETED AND ACTUAL LICAP EXPENDITURES
7 DISAGGREGATED BY WATER CONSERVATION AND LEAK
8 REPAIR ASSISTANCE.

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10 **RESPONSE:**

11 The Department has objected to this information request. PWD and the Advocate are
12 trying to resolve the pending discovery dispute.

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14 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-TAP 2-3** PLEASE PROVIDE THE TOTAL ACTUAL LICAP FY 2026 EXPENSE
2 DISAGGREGATED BY WATER CONSERVATION AND LEAK REPAIR
3 ASSISTANCE COMPONENTS.
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5 **RESPONSE:**

6 The Department has objected to this information request. PWD and the Advocate are
7 trying to resolve the pending discovery dispute.
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9 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-TAP 2-4** PLEASE PROVIDE BUDGETED LICAP EXPENSE FOR FY 2026 AND
2 FY 2027 DISAGGREGATED BY WATER CONSERVATION AND LEAK
3 REPAIR ASSISTANCE COMPONENTS.

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5 **RESPONSE:**

6 The Department has objected to this information request. PWD and the Advocate are
7 trying to resolve the pending discovery dispute.

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9 **RESPONSE PROVIDED BY:** Philadelphia Water Department

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1 **PA-TAP 2-5** FOR THE THREE MOST RECENT FISCAL YEARS, PLEASE PROVIDE THE
2 FOLLOWING:

3 A. PLEASE PROVIDE THE MONTHLY USAGE FOR TAP CUSTOMERS
4 BROKEN DOWN BY THE CATEGORIES SHOWN IN PA-TAP-1-4

5 B. PLEASE PROVIDE THE MONTHLY NUMBER OF TAP CUSTOMERS
6 BROKEN DOWN BY THE CATEGORIES SHOWN IN PA-TAP-1-4.
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8 **RESPONSE:**

9 The Department has objected to this information request. Subject to and without waiving
10 the pending objection, response attachment "PA-TAP-2-5-Attachment.xlsx" is provided.

11 As stated in the response to PA-TAP-1-4, note that a participant is a unique customer
12 receiving a TAP bill, and some TAP customers may receive more than one bill in a month,
13 so totals here may be higher than unique participants reported.
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15 **RESPONSE PROVIDED BY:** Raftelis Financial Consultants, Inc. and Philadelphia Water
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1 **PA-TAP 2-6** FOR THE THREE MOST RECENT FISCAL YEARS,

2 A. PLEASE PROVIDE THE NUMBER OF HIGH USAGE TAP
3 CUSTOMERS THAT WERE REFERRED FOR CONSERVATION
4 OUTREACH BASED ON “HIGH USAGE.”

5 B. PLEASE PROVIDE THE NUMBER OF HIGH USAGE TAP
6 CUSTOMERS THAT WERE REFERRED FOR CONSERVATION
7 OUTREACH AND WHOSE HIGH USAGE WAS DETERMINED TO BE
8 CAUSED BY LEAKS.

9 C. PLEASE PROVIDE THE NUMBER OF HIGH USAGE TAP
10 CUSTOMERS THAT WERE REFERRED FOR CONSERVATION
11 OUTREACH AND WHOSE HIGH USAGE WAS DETERMINED TO BE
12 CAUSED BY SOMETHING OTHER THAN LEAKS.

13 D. FOR HIGH USAGE TAP CUSTOMERS THAT WERE REFERRED FOR
14 CONSERVATION OUTREACH, AND WHOSE HIGH USAGE WAS
15 DETERMINED TO BE CAUSED BY SOMETHING OTHER THAN
16 LEAKS, PLEASE IDENTIFY THE STRATEGIES AND/OR
17 SOLUTIONS THAT ARE PROVIDED TO REDUCE USAGE AND
18 ENCOURAGE CONSERVATION.

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20 **RESPONSE:**

21 The Department has objected to this information request. Notwithstanding the
22 Department’s objections and without waiver thereof, the following response is provided:

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24 In response to part A of the information request, please see the following:

- 25 • FY 2023 = 1,320
26 • FY 2024 = 16,808
27 • FY 2025 = 13,339
28 • FY 2026 through Dec = 10,600

1 In response to parts B and C, this information is not readily available, but will be provided
2 in a supplemental response.

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4 In response to part D, customers who are referred for conservation outreach and are
5 audited, may or may not have leaks. Those with leaks may also have a need for
6 conservation measures other than leak repair. Some frequent conservation measures that
7 are not leak remediations but can be installed for customers to reduce usage include faucet
8 aerators, fill diverters, shower heads, and shower timers.

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10 **RESPONSE PROVIDED BY:** Philadelphia Water Department and Raftelis Financial
11 Consultants, Inc.