

**RESPONSE TO**  
**PHILADELPHIA LARGE USERS GROUP'S INTERROGATORIES**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**QUESTIONS 1-6**

**Dated: April 2026**

1 **PLUG-PWD I-1** CONFIRM WHETHER PWD BELIEVES THE COST IMPACT OF THE  
2 TAP-R RIDER ON NON-TAP CUSTOMERS IS A PUBLIC POLICY  
3 CONCERN.  
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5 **RESPONSE:**

6 The Department maintains that water affordability is a public policy concern. Philadelphia  
7 City Council established the income-based water rate assistance program, currently known  
8 as the Tiered Assistance Program (“TAP”) to improve water affordability. This legislation  
9 dictates that water/wastewater bills for low-income households be affordable and that such  
10 bills be based on a percentage household income rather than consumption. See, Philadelphia  
11 Code §19-1605. Without an alternative funding source for TAP, the TAP discounts required  
12 by legislation are required to be recovered from non-TAP customers. See also response to  
13 PLUG-PWD-I-2.  
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15 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PLUG-PWD I-2** CONFIRM WHAT MEASURES PWD HAS UNDERTAKEN TO MINIMIZE  
2 THE COSTS OF THE TAP-R DISCOUNTS RECOVERED FROM NON-  
3 TAP CUSTOMERS.  
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5 **RESPONSE:**

6 The following response assumes that the TAP-R Discounts referenced in this question  
7 intends to refer to the TAP discounts recovered by TAP-R.  
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9 For the Next Rate Period (September 1, 2026 to August 31, 2027), the average monthly  
10 discount of \$62.82 per TAP Participant. The cost of the program (in other words, the lost  
11 revenue resulting from the TAP discounts) is affected by several factors, such as the number  
12 of enrolled customers (i.e., the projected number of TAP Participants), water and sewer  
13 service usage levels for TAP customers, changes in PWD's non-discounted rate and the  
14 level of discount needed to provide affordable bills to the customers enrolled in the program.  
15 The level of TAP discounts recovered from non-TAP customers is determined by the  
16 requirements of Philadelphia Code §19-1605, the directives of the Rate Board and the  
17 application of the annual TAP-R reconciliation process.  
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19 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PLUG-PWD I-3** PROVIDE A TABLE SHOWING, FOR EACH CALENDAR YEAR 2020-  
2 2025, BY DOLLAR AND PERCENTAGE, THE ANNUAL TAP-R  
3 DISCOUNTS RECOVERED FROM EACH OF THE BELOW CUSTOMER  
4 CLASSES:  
5 A. RESIDENTIAL  
6 B. SENIOR CITIZENS  
7 C. COMMERCIAL  
8 D. INDUSTRIAL  
9 E. PUBLIC UTILITIES  
10 F. HOUSING AUTHORITY.  
11 G. CHARITIES AND SCHOOLS  
12 H. HOSPITALS AND UNIVERSITIES  
13 I. HAND BILLED  
14 J. SCHEDULED (FLAT RATE)  
15 K. PRIVATE FIRE PROTECTION  
16 L. PUBLIC FIRE PROTECTION.

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18 **RESPONSE:**

19 The Department has objected to this information request. PWD and PLUG are discussing  
20 possible ways to resolve this discovery dispute.  
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22 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PLUG-PWD I-4** CONFIRM THE MAXIMUM NUMBER OF ELIGIBLE TAP  
2 PARTICIPANTS.  
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4 **RESPONSE:**

5 We cannot confirm the maximum number of eligible TAP participants as the question is  
6 phrased. The question does not provide a number to confirm or deny.  
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8 For the Next Rate Period (September 1, 2026 to August 31, 2027), the Department's  
9 projections of the proposed TAP-R are in the Formal Notice. Specifically, for the Next  
10 Rate Period, the Department projects that there will be an average of approximately  
11 70,318 TAP Participants per month. See, Schedule PWD 1.  
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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PLUG-PWD I-5** IF THE RESPONSE TO NO. 4 IS NOT AVAILABLE, PROVIDE PWD'S  
2 BEST ESTIMATE OF THE MAXIMUM NUMBER OF ELIGIBLE TAP  
3 PARTICIPANTS.  
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5 **RESPONSE:**

6 See response to PLUG-PWD I-4.  
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8 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PLUG-PWD I-6** PROVIDE A RECALCULATION OF THE PROPOSED TAP-R TO  
2 BECOME EFFECTIVE ON SEPTEMBER 1, 2026, ADJUSTED TO  
3 REFLECT MAXIMUM ENROLLMENT.  
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5 **RESPONSE:**

6 Please refer to responses to PLUG-PWD-I-4 and PLUG-PWD-I-5.  
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8 PLUG can perform its own calculations using the Rate Rider Reconciliation Workbook,  
9 which is posted on the Rate Board’s website for the 2026 TAP-R reconciliation  
10 proceeding.  
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12 To change the projected enrollment, go to the “Assumptions and Inputs” sheet of the  
13 Workbook and change the Estimated TAP Participants - Next Rate Period (cell C 13). The  
14 Workbook will recalculate the Estimated TAP Total Discount (cell C 15) on the  
15 “Assumptions and Inputs” sheet as well as the projected TAP-R Surcharges for water (cell  
16 G 19) and wastewater (cell J 19) on the “Summary” sheet of the Workbook.  
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18 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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