

**SUPPLEMENTAL RESPONSE TO  
PUBLIC ADVOCATE'S INTERROGATORIES (TAP SET 2)  
AND  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
QUESTIONS 1, 2, 3, 4 and 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 In accordance with the Hearing Officer’s Order dated April 13, 2026, the following  
7 supplemental response is provided:  
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9 The Reconciliation Workbook is based upon data provided in Schedule PWD-5 which has  
10 been updated to incorporate the actual data (participants, discounts, non-tap volumes, etc.)  
11 for January, February and March 2026 based upon BASIS2 production data. This data is  
12 subject to restatement based upon the static copy to be provided upon completion.  
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14 Refer to the supplemental response attachments “PWD-5 Rate Rider Reporting Model  
15 20260407\_PROD.xlsx” and “Rate Rider - Reconciliation Workbook - 2026.04.14  
16 (PROD).xlsx.” Assumptions and projections have been updated to reflect the addition of  
17 the actual data through March 2026.  
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19 **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 In accordance with the Hearing Officer's order dated April 13, 2026, the following  
12 supplemental response is provided:

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14 Disaggregated data are not available for the time period requested. Disaggregated data are  
15 available only beginning September 2025 and later, and those data are provided in the  
16 response to PA-TAP 2-3.

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

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 In accordance with the Hearing Officer's order dated April 13, 2026, the following  
7 supplemental response is provided:  
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9 Of the 1,448 accounts provided water audits by CMC between September 2025 and March  
10 2026, 300 received leak repair services. Many of these accounts also received other water  
11 conservation measures. For customers receiving leak repair services (including ones that  
12 included conservation services along with leak repair), the direct cost was \$112,500. Of  
13 the 1,448 accounts provided water audits by CMC between September 2025 and March  
14 2026, 1,148 received water conservation measures, but did not receive leak repair services.  
15 The direct cost for services to these customers was \$430,500.  
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17 **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 In accordance with the Hearing Officer's order dated April 13, 2026, the following  
7 supplemental response is provided:

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9 The Department does not budget LICAP expenditures on a disaggregated basis as  
10 suggested in the discovery request. The budget for LICAP for FY2026 is \$900,000. The  
11 budget for LICAP for FY2027 has been requested, but not yet approved, to at \$1,800,000.  
12 Note that the FY 2027 base rates were not adopted based on the FY 2027 budget request.  
13 In addition, PWD does not spend 100% of budgeted expenditures.

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15 **RESPONSE PROVIDED BY:** Philadelphia Water Department  
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1 **PA-TAP 2-6** FOR THE THREE MOST RECENT FISCAL YEARS,  
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- 3 A. PLEASE PROVIDE THE NUMBER OF HIGH USAGE TAP  
4 CUSTOMERS THAT WERE REFERRED FOR CONSERVATION  
5 OUTREACH BASED ON “HIGH USAGE.”  
6 B. PLEASE PROVIDE THE NUMBER OF HIGH USAGE TAP  
7 CUSTOMERS THAT WERE REFERRED FOR CONSERVATION  
8 OUTREACH AND WHOSE HIGH USAGE WAS DETERMINED TO BE  
9 CAUSED BY LEAKS.  
10 C. PLEASE PROVIDE THE NUMBER OF HIGH USAGE TAP  
11 CUSTOMERS THAT WERE REFERRED FOR CONSERVATION  
12 OUTREACH AND WHOSE HIGH USAGE WAS DETERMINED TO BE  
13 CAUSED BY SOMETHING OTHER THAN LEAKS.  
14 D. FOR HIGH USAGE TAP CUSTOMERS THAT WERE REFERRED FOR  
15 CONSERVATION OUTREACH, AND WHOSE HIGH USAGE WAS  
16 DETERMINED TO BE CAUSED BY SOMETHING OTHER THAN  
17 LEAKS, PLEASE IDENTIFY THE STRATEGIES AND/OR  
18 SOLUTIONS THAT ARE PROVIDED TO REDUCE USAGE AND  
19 ENCOURAGE CONSERVATION.  
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21 **RESPONSE:**

22 In accordance with the Hearing Officer’s order dated April 13, 2026, the following  
23 supplemental response is provided:

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25 Regarding Item B: Of the 1,448 accounts provided water audits by CMC between  
26 September 2025 and March 2026, 300 received leak repair services. Many of these  
27 accounts also received other water conservation measures. While CMC addresses leaks  
28 when identified and feasible, neither PWD nor CMC provides a determination of cause for  
high usage.

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Regarding Item C: Of the 1,448 accounts provided water audits by CMC between September 2025 and March 2026, 1,148 received water conservation measures, but did not receive leak repair services. While CMC addresses leaks when identified and feasible, neither PWD nor CMC provides a determination of cause for high usage

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