

BEFORE THE
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

Re: Philadelphia Water Department Proposed Charges in Rates and Charges	2026 TAP-R Adjustment Proceeding
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**PHILADELPHIA WATER DEPARTMENT'S
INFORMATION REQUESTS
TO THE PUBLIC ADVOCATE, SET I**

The Philadelphia Water Department (“Department” or “PWD”) requests that the Public Advocate provide full and complete answers to the following interrogatories and request for production of documents (collectively, “information requests”) upon the undersigned.

Information Requests to the Public Advocate

- PWD-TAP-I-1 Please provide the electronic workpapers (Excel) supporting Schedules LKM-TAP-1 to LKM-TAP-6, with the formulae intact.

- PWD-TAP-I-2 Please provide the electronic workpapers (Excel) supporting the analysis described in the Direct Testimony of Lafayette K. Morgan, Jr., (dated April 17, 2026).

- PWD-TAP-I-3 Please provide the monthly TAP participation levels, estimated TAP discounts, and estimated TAP water consumption used by Mr. Morgan for the following months:

- a. December 2025
- b. January 2026
- c. February 2026
- d. March 2026
- e. April 2026
- f. May 2026
- g. June 2026
- h. July 2026
- i. August 2026
- j. September 2026
- k. October 2026
- l. November 2026
- m. December 2026
- n. January 2027
- o. February 2027
- p. March 2027
- q. April 2027
- r. May 2027
- s. June 2027
- t. July 2027
- u. August 2027

PWD-TAP-I-4 Confirm or deny that customers enrolled in TAP receive a bill based upon their income levels and not their actual pre-TAP discount bill.

PWD-TAP-I-5 Confirm or deny: The most reliable method for calculating TAP participation and participant discount values is to base the analysis on the most recent known and measurable data available. If your response is anything other than an unqualified “confirm,” please provide a detailed explanation and reasoning for the response.

- PWD-TAP-I-6 Please confirm that Mr. Morgan’s recommended average TAP discount per participant is based only on the most recent 12-months of available data. If Mr. Morgan’s recommended average TAP discount per participant is adjusted for other factors, please describe them in detail.
- PWD-TAP-I-7 Please describe how Mr. Morgan accounts for rate changes to water and sewer rates when applying his recommended approach to calculating the average TAP discount per participant based on the most recent 12-months of available data.
- PWD-TAP-I-8 Please confirm or deny that the typical bill for 0.7 MCF residential customer in Table C-4 of the compliance filing in the 2025 Rate Proceeding reflects a 10.1% increase for rates effective September 1, 2025.
- PWD-TAP-I-9 Please confirm that Mr. Morgan’s testimony and schedules, in eliminating the .25% growth factor proposed by PWD, assume essentially “zero growth” in the number of TAP participants through the Next Rate Period.
- PWD-TAP-I-10 Confirm or deny: There is pending legislation (Bill No. 251021) to be introduced in City Council in this legislative session (before June 30, 2026) that will authorize a change in the eligibility threshold for the TAP program. If your response is anything other than an unqualified “confirm,” please provide a detailed explanation and reasoning for the response.
- PWD-TAP-I-11 Confirm or deny: That the proposed legislation referenced in PWD-TAP-I-10 is intended to authorize, among other things, the increase of the TAP income eligibility threshold to include households at 151-200% FPL. If your response is anything other than an unqualified “confirm,” please provide a detailed explanation and reasoning for the response.

- PWD-TAP-I-12 Please provide your best estimate of the maximum number of eligible TAP participants in the following Federal Poverty Level (FPL) household income tiers:
- a. 0-150% FPL
 - b. 150-200% FPL
 - c. 200-250% FPL
- PWD-TAP-I-13 Please confirm that the number of Philadelphia households included in the 151-200% FPL income tier is roughly 40,000.
- PWD-TAP-I-14 Please confirm that even the inclusion of some 16,000 additional households from the 151-200% FPL income tier in the TAP program (based on a recent estimate by Community Legal Services of eligible households that may apply) would represent a significant future increase in the projected TAP enrollment (approximately 23%).
- PWD-TAP-I-15 Please confirm whether Mr. Morgan was aware of the pending legislation described in PWD-TAP-1-10 in preparing his testimony in this proceeding (PA Statement 1).
- PWD-TAP-I-16 Please provide the source of Mr. Morgan's table of Number of Participants by month as presented on page 10 of his testimony (PA Statement 1).
- PWD-TAP-I-17 Please confirm that in the settlement in the 2025 TAP-R proceeding participant numbers and related discounts were lower than the actual experience.

Respectfully submitted,

/s/ Andre C. Dasent

Andre C. Dasent, Esquire

Commerce Square
2001 Market Street, 25th Floor
Philadelphia, PA 19103

Laurice Smith, Esquire
Neal Sellers, Esquire
Philadelphia Law Department
1101 Market Street, Fifth Floor
Philadelphia, PA 19107

Carl R. Shultz, Esquire
Renardo Hicks, Esquire
Eckert Seamans Cherin & Mellott, LLC
213 Market Street, 8th Floor
Harrisburg, PA. 17101

Dated: April 20, 2026

Attorneys for Philadelphia Water Department