

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES (TAP SET 4)
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-4

Dated: May 2026

1 **PA-TAP 4-1** REFER TO REBUTTAL STATEMENT 1, PAGE 4, LINES 4 TO 6 AND THE
2 RESPONSE TO PA-TAP-1-5. PLEASE CONFIRM OR DENY THAT THE .25%
3 MONTHLY GROWTH RATE WAS JUDGMENTALLY DERIVED. IF YOUR
4 RESPONSE IS ANYTHING OTHER THAN AN UNQUALIFIED “CONFIRM,”
5 PLEASE PROVIDE THE DERIVATION THAT RESULTS IN THE .25%.

6
7 **RESPONSE:**

8 Raftelis used its expertise, experience, and subjective opinion as well as the recent trend in
9 participation to project the 0.25% monthly growth rate. The 0.25% monthly growth rate
10 was explained in Schedule PWD-4, which is part of the Formal Notice.

11
12 TAP participation is projected to increase 0.25% per month, on average, over the
13 projection period. These modest monthly increases are expected due to small monthly
14 increases in IDEA pre-qualified candidates and traditional enrollment candidates, and
15 align with the recent trend in participation, notwithstanding the historical variation in TAP
16 participant billing based on the length of the month and number of business days. This
17 projection does not anticipate additional enrollment caused by a potential change to
18 underlying TAP eligibility requirements, such as those in a recent proposed City Council
19 bill.

20
21 The average growth in TAP Participants from September 2024 through March 2026 is 178
22 per month. See the Department’s Response to PA-TAP-4-2.

23
24 The 0.25% monthly growth rate used in Schedule PWD-5 results in an additional 171 to
25 178 participants per month for an average increase of 174 participants per month for
26 September 2026 to August 2027. Observe that the 0.25% monthly growth rate is half of
27 the actual compound monthly average growth rate of 0.5% as provided in the response for
28 PA-TAP-4-3.

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2 Consultants, Inc.

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5 **PA-TAP 4-2** REFER TO REBUTTAL STATEMENT 1, PAGE 9, LINES 2 TO 9. PLEASE
6 IDENTIFY THE NUMBER OF TAP PARTICIPANTS FROM PWD'S
7 PARTNERSHIP WITH IDEA THAT WERE ADDED MONTHLY FOR THE
8 PERIOD SEPTEMBER 2024 THROUGH THE MOST RECENT MONTH
9 AVAILABLE.

10
11 **RESPONSE:**

12 Auto enrollment through IDEA added 6,179 TAP Participants between September 2024
13 and March 2026. The average growth in TAP Participants from September 2024 through
14 March 2026 (19 Months) is 178 participants per month.

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17 Consultants, Inc.

1 **PA-TAP 4-3** REFER TO REBUTTAL STATEMENT 1, PAGE 12, LINE 2. PLEASE SHOW
2 THE DERIVATION OF THE 0.4% COMPOUND GROWTH RATE.

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4 **RESPONSE:**

5 TAP Participation in March 2026 was 68,413. The TAP Participation in April 2025 was
6 64,762. That difference, 3,651, is “more than 3,000” as stated in PWD Rebuttal Statement
7 1, page 11, line 23. The change in participation (3,651) divided by the April 2025
8 participants (64,762) equates to a 5.64% increase over 12 months, or, when divided by 12,
9 a 0.4698% monthly increase, which “exceeds 0.4 percent” as stated in PWD Rebuttal
10 Statement 1, page 12, line 2.

11 The actual derivation of the average monthly growth rate accounting for compounding
12 would be 0.5%. The following formula provides the derivation of the 0.5% average
13 monthly growth rate: $(68,413/64,762)^{(1/11)} = 0.005 = 0.5\%$.

14
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1 **PA-TAP 4-4** REFER TO THE 2026 TAP RECONCILABLE RIDER REPORTS AND
2 PROJECTION MODEL: TRR PROJECTIONS. PLEASE PROVIDE A
3 RECALCULATION OF THE MONTHLY TOTAL DISCOUNT FOR THE
4 PERIOD JANUARY 2025 TO AUGUST 2025 USING THE BASE RATES
5 THAT BECAME EFFECTIVE SEPTEMBER 1, 2025.
6

7 **RESPONSE:**

8 The Total TAP Discounts from January 2025 to August 2025 was \$26,822,678.91. The
9 Average TAP Participant Water Usage from January 2025 to August 2025 was 6 CCF per
10 month. Using the difference between the Typical Bill (Sept 1, 2024 to Aug 31, 2025) for
11 Residential Customers with 6 CCF monthly water usage and the corresponding Typical
12 Bill (Sept 1, 2025 to Aug 31, 2026), the Total Discounts from January 2025 to August
13 2025 would be about \$31,897,565.79.
14

15 The difference is \$5,074,886.88.
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17 Supporting calculations are provided as response attachment PA-TAP-4-4.xlsx.
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