

**BEFORE THE PHILADELPHIA WATER, SEWER AND STORM WATER
RATE BOARD**

In the Matter of a Proposed Rate Increase in :
Water, Sewer and Storm Water Rates : **FY 2019-2021 Rates**

Public Advocate's Interrogatories & Requests for Production of Documents, Set I

The following instructions apply to these Advance Interrogatories and Requests for Production of Documents:

1. *These interrogatories shall be deemed to be continuing. PWD is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as first becomes available to PWD after the answers hereto are served.*
2. *The answer should first restate the question asked and also identify the name and position of the individual who provided the answer.*
3. *Copies of all replies are to be provided in PDF and/or XLS format via email and/or on CDs.*
4. *Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession, control, or custody of PWD or may be reasonably ascertained thereby.*
5. *As used in these discovery requests, the following terms shall have the meanings provided below, unless the context clearly requires otherwise:*
 - a. *“2016 rate proceeding” means the PWD rate increase proceeding commenced by Advance Notice on January 8, 2016 and Formal Notice on February 8, 2016, culminating in the Report of the Board on PWD Proposed Rate Changes, FY17, FY18, dated as of June 7, 2016.*
 - b. *“Board” means the Philadelphia Water, Sewer and Storm Water Rate Board.*
 - c. *“Document,” “documentation,” or “workpaper” means and includes, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, bulletins, transcripts, diaries, analyses, spreadsheets, calculations, presentations, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires, surveys, drawings, graphs, charts, photographs, and notations of any sort (including, e.g., concerning conversations, telephone calls, meetings or other communications), and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form stored or contained in or on whatever medium including computerized memory or magnetic media.*
 - d. *“PWD” or “Department” as used herein includes Philadelphia Water Department, Philadelphia Water Revenue Bureau (WRB), and their attorneys, agents, employees, or other representatives.*
 - e. *“Shut off” means the suspension or discontinuance of water service to a property by PWD.*
 - f. *“TAP” means the Tiered Assistance Program defined in Section 100.1(n) of PWD regulations.*

- PA-I-1. Please provide a description of all services performed by the City Treasurer's Office regarding PWD operating funds or accounts.
- PA-I-2. Please provide a description of all services performed by the City Treasurer's Office regarding PWD capital funds or accounts.
- PA-I-3. Please provide a description of all services performed by the City Treasurer's Office regarding PWD debt service funds or accounts.
- PA-I-4. Please provide a description a description of all services performed by the City Treasurer's Office regarding PWD debt service reserve funds or accounts.
- PA-I-5. Please provide a description of all services performed by the City Treasurer's Office regarding the Water Fund.
- PA-I-6. Please provide a description of all services performed by the City Treasurer's Office regarding water and wastewater revenue bonds.
- PA-I-7. Please provide a description of all services performed by the City Treasurer's Office regarding PWD debt other than water and wastewater revenue bonds.
- PA-I-8. Please provide a description of all services provided by the City Treasurer's Office regarding the Water Department's annual budget.
- PA-I-9. Reference the April 5, 2016 transcript in the 2016 rate proceeding, at Page 107 (explaining the City Treasurer's Office's practice for formulating interest rate assumptions in the Water Department's debt service budget):
- a. Does the City Treasurer's Office utilize the same practice to formulate interest rate assumptions for the Water Department's debt service that was described in the April 5, 2016 transcript in the 2016 rate proceeding, at Page 107?
 - b. If the answer to PA-I-9(a) is anything other than an unequivocal "yes," please provide a description of the practice used to formulate the interest rate assumptions for the Water Department's debt service.
 - c. Please identify all individuals, by name and title, who participated in formulating the interest rate assumptions for the Water Department's debt service shown in the filing (reference Schedule BV-E1, Table C-9).
- PA-I-10. Reference PWD Statement No. 2 in the 2016 rate proceeding (Direct Testimony of Melissa LaBuda), at Page 18 ("As part of the City's budgeting process, the Department works with the City of Philadelphia Treasurer's Office to establish the Department's debt service budget for the following five fiscal years"):
- a. Does the Water Department work with the City Treasurer's Office to establish its debt service budget as part of the City's budgeting process, including projected debt service for five fiscal years, as described in the 2016 rate proceeding?

- b. If the answer to PA-I-10(a) is anything other than an unequivocal “yes,” please provide a description of the practice used to establish the Water Department’s debt service budget as part of the City’s budgeting process.
- c. Please identify all individuals, by name and title, who participate in establishing the Water Department’s debt service budget as part of the City’s budgeting process.

PA-I-11. Please confirm that the Water Department’s Deputy Commissioner in charge of finance serves as a member of the City of Philadelphia’s Investment Committee.

PA-I-12. Please confirm that the City Treasurer serves as a member of the City of Philadelphia’s Investment Committee.

PA-I-13. For each meeting of the Investment Committee held in FY 2017, please provide:

- a. A copy of the agenda.
- b. A copy of the meeting minutes.
- c. A copy of all documents relevant to the operating, capital, debt service, and debt service reserve accounts of the Water Department that were distributed to Investment Committee members.

PA-I-14. For each meeting of the Investment Committee held in FY 2018 to date, please provide:

- a. A copy of the agenda.
- b. A copy of the meeting minutes.
- c. A copy of all documents relevant to the operating, capital, debt service, and debt service reserve accounts of the Water Department that were distributed to Investment Committee members.

PA-I-15. Please identify all PWD personnel who participated in the drafting or review of 2017 proposed legislation amending PWD's general bond ordinance, currently designated City Council Bill No. 171110.

PA-I-16. Please identify all City Treasurer's Office personnel who participated in the drafting or review of 2017 proposed legislation amending PWD's general bond ordinance, currently designated City Council Bill No. 171110.

PA-I-17. Please provide copies of all correspondence (written, electronic or otherwise) between the Philadelphia Water Department and the City Treasurer from September 14, 2017 through present, regarding:

- a. PWD revenue bonds.

- b. PWD indebtedness other than revenue bonds.
- c. PWD revenues.
- d. PWD financial performance.

PA-I-18. Please provide a copy of all correspondence (written, electronic or otherwise) between the Water Department and the City Treasurer's Office regarding 2017 proposed legislation amending PWD's general bond ordinance, currently designated City Council Bill No. 171110.

PA-I-19. Please provide a copy of all correspondence (written, electronic or otherwise) between the Water Department and the City Treasurer's Office regarding the 2016 rate proceeding.

PA-I-20. Please provide a copy of all correspondence (written, electronic or otherwise) between the Water Department and the City Treasurer's Office regarding PWD's proposed rate increase for FY 2019-2021.

PA-I-21. Does PWD possess and/or maintain a document reflecting the current provisions General Water and Wastewater Revenue Bond Ordinance of 1989, including all amendments thereto (e.g., an unofficial restatement)? If so, please provide a copy.