

**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 II**

- PA-II-1. Please update Schedule BV-ES:WP-1, page 13, to include FY 2017 historical usage per account.
- PA-II-2. Reference Schedule BV-E4, Tables M-1 and M-2. Please identify the number of each type of service performed in the most recent FY that data is available. Water charge items, 2a, 2b, 3, 7a-d, 7e-g, and PWD Regulations Reference 6 - 7d may be consolidated for purposes of this response.
- PA-II-3. Reference PWD Statement No. 2, page 36, lines 1-7 and page 37, lines 9-15. Please explain when charges would begin to be reassessed on the acquired property.
- PA-II-4. Reference PWD Statement No. 6, page 8, lines 5-12. For the most recent FY data that is available, for the 10 SMIP and GARP projects completed during the FY, please identify:
- a. The total grant awarded for each project; and
 - b. The participants IA and GA billing units before the project was initiated and the billing units after project completion.
- PA-II-5. Please explain how SMIP and GARP project grants are allocated to customer class in PWD's cost of service studies.
- PA-II-6. Please explain why it would be unreasonable to use average annualized winter-months water sales for wastewater volumes for residential customers.

- PA-II-7. For each hour in the month during the summer of 2017 that PWD's peak hour water demand was experienced, please provide the volume of water delivered into each of the PWD's water treatment plants and the output from each plant. Please provide the requested information in Excel format.
- PA-II-8. Reference PWD Statement No. 9A, page 59, lines 15-24, and page 60, lines 1-2. Please provide the historical demands experienced and relied upon to develop the maximum day and hour percentages.
- PA-II-9. Please identify the length of time it typically takes to treat raw water at PWD's water treatment facilities before it is discharged into the distribution system.
- PA-II-10. Reference PWD Statement No. 9A, page 62, lines 3-7. Please provide an explanation and calculation showing how the capacity factors for Aqua were developed.
- PA-II-11. Reference PWD Statement No. 9A, page 66, lines 8-11; pages 67, lines 1-4; and page 96, lines 19-25. Please explain why different base/maximum day/maximum hour/capacity percentages were used in the cost of service studies for power costs when the same utility provides electric service.
- PA-II-12. Reference PWD Statement No. 9A, page 66, lines 21-24. Please identify those treated water pumping expenses that PWD considers to be maximum hour related.
- PA-II-13. Reference PWD Statement No. 9A, page 85, lines 24-25. Please explain how the 1/1 allowance was determined. Include supporting calculations and documentation.
- PA-II-14. Reference PWD Statement No. 9A, page 86, lines 23 through page 87, lines 2; page 87, lines 19-22; and page 88, lines 16-19. Please explain why it would be unreasonable to allocate a portion of these costs based on average rates of flow when water distribution main are allocated partially on average rates of flow and are designed based on maximum flows.

- PA-II-15. Reference PWD Statement No. 9A, page 87, line 8. Please provide a detailed explanation of how the 64 percent allocation was determined. Include supporting documentation and calculations.
- PA-II-16. Please identify the metering facilities in place that measure wastewater and stormwater flows into the PWD's wastewater treatment facilities (e.g., just prior to entering the treatment facilities, and at upstream locations) (separately). Also explain how accurate any upstream metering would be in measuring inflows to PWD's three wastewater treatment facilities.
- PA-II-17. Reference PWD Statement No. 9A, page 96, lines 7-14. Please provide a complete copy of the referenced analysis.
- PA-II-18. Reference PWD Statement No. 9A, page 99, lines 18-25. Please explain how PWD's meter investment and related O&M expenses are allocated to wastewater and stormwater service.
- PA-II-19. Reference PWD Statement No. 9A, page 103, lines 3-5:
- a. Please provide an explanation as to how the 95 percent return factor was determined. Provide supporting documentation and calculations; and
 - b. Please identify and provide copies of all articles/studies reviewed by the B&V witness that evaluate return factors by customer type.
- PA-II-20. Reference PWD Statement No. 9A, page 103, lines 1-3:
- a. Please provide an explanation as to how the 1.5 and 2.5 flow rates were determined. Include supporting documentation and calculations; and
 - b. Explain the difference between the term "wastewater treatment plant" and "water pollution contract plant."
- PA-II-21. Reference PWD Statement No. 9A, page 72, lines 19-24. Please explain the basis for using two simultaneous fires, one using 10,000 gpm and the other using 5,000 gpm. Are the use of fires of this magnitude consistent with ISO standards for water system? Provide supporting documentation.

- PA-II-22. What is the population of PWD's water service territory.
- PA-II-23. Reference BV-E1, Table W-10. Please identify by line item, the costs associated with water quality testing reflected in test year O&M expense.
- PA-II-24. Please identify the frequency with which PWD performs each water quantity test and the criteria which determines how frequently each water quality test should be performed (i.e., daily, weekly, production quantity, etc.).
- PA-II-25. Reference BV-E1, Table C-1, lines 4-8. Please explain why each FY increase has 10 effective months. What is the impact of 10 oppose to 12 effective months.
- PA-II-26. Reference BV-E1, Table W-8, lines 14-15. Please identify each of PWD's filtered water storage facilities and the maximum capacity of each facility.
- PA-II-27. Reference BV-E1, Table W-10, lines 3 and 11. Please provide a breakdown of the components of these costs and explain how these costs were allocated to function.
- PA-II-28. Reference BV-E1, Table W-11. Please explain where the usage of the City Leased Properties and City Government customer classes from the 2017 - 2018 proceeding are included in this table.