

**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 VII**

- PA-VII-1. Please describe and explain in detail the PWD's efforts to promote the conservation of water throughout the year, during peak days, and during peak hours.
- PA-VII-2. Please describe and explain in detail the benefits the PWD system and its customers could potentially realize if PWD was successful in its annual, peak day, and peak hour customer conservation efforts.
- PA-VII-3. Please explain whether private fire protection service customers benefit from the provision of public private fire protection service and whether private fire protection customers have been allocated any of the costs of public fire protection that will no longer be funded by the City's General Fund.
- PA-VII-4. Reference PA-ADV-36, item 4. Please identify the actual total monthly feet of GA and IA associated with community gardens since January 2017. Also identify the GA and IA associated with all pending applications.
- PA-VII-5. Reference PA-ADV-39. Please explain how a typical residential customer can determine their volumetric usage water and sewer charges under the current bill format.
- PA-VII-6. Reference PA-ADV-41:
- a. Please explain the difference between the two tabs included in the Excel file; and
  - b. Please update the response for FY 2017.

- PA-VII-7. Reference PA-ADV-42. Please provide a complete copy of the B&V capacity factor analysis.
- PA-VII-8. Reference PA-ADV-43, 2016 Standard International Water Association/AWWA Water Balance:
- a. Please confirm that for 2016, approximately 40 percent of the water produced by the PWD was non-revenue producing;
  - b. Please explain whether PWD operates its system at reduced pressures throughout the year, on peak days, or peak hours to reduce non-revenue producing water; and
  - c. Please explain in detail whether non-revenue producing water due to leaks would tend to increase, decrease, or remain the same during peak days or peak hours.
- PA-VII-9. Reference Schedule BV-E4. Please explain how each of the calculated charges (business and non-business hours) charges reflected on this schedule were determined. Include supporting calculations, documentation, and workpaper.
- PA-VII-10. Reference the response to PA-II-7. Please explain why the volume of water delivered to the water treatment plants typically exceeds the output of the plants on an hourly basis, and in total for the month.
- PA-VII-11. Reference the response to PA-II-8. Please:
- a. Update the response for FY 2017; and
  - b. Reconcile the response with the data provided in Attachment PA-II-7.
- PA-VII-12. Reference the response to PA-ADV-43.
- a. Please explain how “Leakage on Mains” and “Leakage on Service Connections up to the point of Customer Metering” quantities are determined; and
  - b. Please describe in detail PWD’s efforts to reduce service connection leaks.
- PA-VII-13. Please identify the number of service lines associated with service to each customer class included in the water cost of service study.

- PA-VII-14. Reference the response to PA-II-23. Please provide an estimate of the budgeted costs for the lab costs at each water treatment plant.
- PA-VII-15. Reference PWD Statement No. 9A, page 59, lines 15-24. Please reconcile the maximum day and hour percentages identified there with those reflected as “Use” in the response to PA-II-8.
- PA-VII-16. Reference Attachment PA-II-7. Please explain whether the plant output identified in the attachment would be reflective of the PWD’s use of its treated water pumping facilities. If no, please provide a breakdown of the investment of PWD’s treated water pumping plants and booster pumping stations in the distribution system.
- PA-VII-17. Reference PWD Statement No 9A, page 67, line 6, and page 78, line 17. Please reconcile the different water treatment plant sludge costs/credits.
- PA-VII-18. Reference PWD Statement No. 9A, page 108, lines 19-25. Please identify the approach used in proceedings since 2004.
- PA-VII-19. Please identify where revenues and the applicable billing detriments under proposed rates for FYs 2019-2021 can be found in file WCOS17\_19.xls. If not included in the file, please provide revenues and the applicable billing detriments and proposed rates for FYs 2019-2021.
- PA-VII-20. Reference Table W-18. Please explain why the PWD is proposing to change the current service charges in this case and in each of the following two years when keeping the current service charges in place would be administratively less burdensome, reduce customer confusion, and recover approximately the same amount of revenue through customer charges over the period FYs 2019-2021.
- PA-VII-21. Please explain what type of customers are generally Hand Billed?
- PA-VII-22. Please identify the extent to which stormwater collected in the stormwater conveyance system is treated at one of PWD’s wastewater treatment facilities.

Provide an estimate of these volumes and explain how these volumes are reflected in the wastewater cost of service study.

PA-VII-23. Reference Table WW-16. Please explain why the wastewater cost of service study includes metering costs, and how the metering costs were determined (allocated).