

**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 IX**

- PA-IX-1. Regarding the reply to PA-VI-3, Planning & Engineering, please provide the following expenses for each fiscal year 2014-2016:
- a. separation payments due to retirements
  - b. licenses and permit fees for PWD
  - c. advertisements related to public works bidding
  - d. spending for employee training
- PA-IX-2. Regarding the reply to PA-VI-4 and PWD Exhibit 6, pages 48 & 50, Direct O&M Actual to Budget Factors, Operations, Gas, please explain in detail the increase in Gas expense from \$4,000,000 for FY2015 to \$5,692,000 for FY2016.
- PA-IX-3. Regarding the reply to PA-VI-5, Planning & Environmental Services, please provide the following expenses for each fiscal year 2014-2016:
- a. professional services related to the Long-Term Control Plan green infrastructure maintenance for the Planning and Environmental Services program.
- PA-IX-4. Regarding the reply to PA-VI-16, Adjustments, please provide detailed workpapers (not a narrative) supporting the following adjustments:
- a. Operations-Salaries & Wages
  - b. Planning & Environmental Services-Salaries & Wages
- PA-IX-5. Regarding the reply to PA-VI-29c, please explain in detail why the \$1,493,250 adjustment that reflects capacity to pay for energy & gas demands due to weather related events is considered to be recurring. Please provide a 3-year history of similar payments that were not included in previous budgets.
- PA-IX-6. Regarding the reply to PA-VI-29d, please explain in detail why the increases for WRAP/TAP are considered to be recurring adjustments.
- PA-IX-7. Regarding the reply to PA-VI-29e, maintenance & repair, please provide a 3-year history of similar expense increases that were not included in previous budgets.
- PA-IX-8. Regarding the reply to PA-VI-29h, minor class 200 increases, please provide a 3-year history of similar expense increases that were not included in previous budgets.

- PA-IX-9. Regarding the reply to PA-VI-29i, building & construction supplies for crews & glass replacement at the Southeast Plant, please provide a 3-year history of similar expense increases that were not included in previous budgets.
- PA-IX-10. Regarding the reply to PA-VI-29j, parts/equipment, please provide a 3-year history of similar expense increases that were not included in previous budgets.
- PA-IX-11. Regarding the reply to PA-VI-29k, distributing control system upgrade, etc, please provide a 3-year history of similar expense increases that were not included in previous budgets.
- PA-IX-12. Regarding the reply to PA-VI-29l, purchase of monitoring equipment, please provide a 3-year history of similar expense increases that were not included in previous budgets.
- PA-IX-13. Regarding the reply to PA-VI-29m, minor class 300 increases, please provide a 3-year history of similar expense increases that were not included in previous budgets.
- PA-IX-14. Regarding the reply to PA-VI-29n, communication & lighting equipment, please provide a 3-year history of similar expense increases that were not included in previous budgets.
- PA-IX-15. Regarding the reply to PA-VI-29q, additional services provided by the general fund, please provide a detailed breakdown and description of such services and explain why such services are recurring.
- PA-IX-16. Regarding the response to PA-VI-2, please fully explain why CWIP is excluded in calculating the inflated net plant of 3.4%.
- PA-IX-17. Regarding the response to PA-VI-23, please confirm that the reason 2015 was excluded from determining the average annual increase in net plant is because the “[n]et plant investment (net of construction in progress) in FY 2015 increased 8.06% from FY 2014, which is nearly twice the annual increase experienced in FY 2014 and FY 2016”. If that is not the reason it was excluded, please explain why it was excluded.
- PA-IX-18. Regarding the response to PA-VI-22, please provide the data including the supporting documentations used to calculate the 6.8% and 3.7% chemical cost escalation.
- PA-IX-19. Regarding the response to PA-VI-10 and 11, please explain why the growth rate was not based upon the class specific growth instead of using the overall General Service growth rate for 5/8” Meters as used by PWD.
- PA-IX-20. In the response to PA-VI-27, the table included as part of the response shows actual to budget ratios well below 90% using the most recent 2- and 3-year averages. Please explain why the 90% is appropriate given that PWD has not experienced an actual to budget ratio in the 90% range since 2003 and 2004.

PA-IX-21. Regarding Schedule BV-E5 WP-1, Appendix 8, please provide the documentation supporting the 3% used in the General Fund's five-year plan.

PA-IX-22. Regarding Schedule BV-E5 WP-1, Appendix 8, it is stated: "[o]f the purchases already made, the executed prices are similar or slightly lower than current rates". Will any of the purchases already made apply to electricity to be used in FY 2021? If so, please estimate how much of PWD's electricity in FY 2021 would be covered by those purchases.

PA-IX-23. Regarding the reply to PA-ADV-10, Rate Case Expense, please provide a similar breakdown showing budgeted and actual rate case expense for the past three base rate cases.