

1 **RESPONSE TO PUBLIC ADVOCATE’S INTERROGATORIES**
2 **AND REQUESTS FOR PRODUCTION OF DOCUMENTS**

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- 4 **PA-XI-1.** REFERENCE THE RESPONSE TO PA-VII-8 AND PA-VII-11:
- 5 A. DOES THE PWD PROVIDE A LOG OR INFORMATION ON WATER
- 6 MAIN BREAKS?
- 7 B. PLEASE IDENTIFY THE DAY OF MAXIMUM DAY AND HOUR
- 8 DEMAND EACH YEAR;
- 9 C. DID PWD EXPERIENCE MAIN BREAKS ON ANY OF THE DAYS
- 10 IDENTIFIED IN SUBPART (B)? IF YES, PLEASE IDENTIFY THE SIZE
- 11 OF THE MAIN WHICH EXPERIENCED A BREAK AND AN ESTIMATE
- 12 OF THE AMOUNT OF WATER LOST; AND
- 13 D. PLEASE PROVIDE A REPRESENTATIVE SAMPLE OF THE LOGS OR
- 14 OTHER INFORMATION AVAILABLE ON WATER MAIN BREAKS
- 15 MAINTAINED BY PWD. INCLUDE THE LOGS/INFORMATION FOR
- 16 THOSE DAYS IDENTIFIED IN SUBPART (B).

17 **RESPONSE:**

- 18 a. Yes. See the response attachment PA-XI-1(a). PWD’s records do not necessarily reflect
- 19 when the break occurred but rather, when a specific break was repaired. Repairs typically
- 20 occur within 24 hours but can vary depending upon crew availability and number of breaks
- 21 called in.
- 22 b. Please see the tables in the response attachment PA-XI-1(b), For Peak Rate and Max Day.
- 23 c. Please see the table referenced in the response for part b. Note the table referenced for item
- 24 B and C does not list all main breaks which may have occurred on the days referenced,
- 25 rather only breaks/events which were measurable on our SCADA (Supervisory Control and
- 26 Data Acquisition) system.
- 27 d. See Response attachment PA-XI-1(d) monthly summary sheets.

28 **RESPONSE PROVIDED BY:** Donna Schwartz, Philadelphia Water Department

1 **PA-XI -2.** PLEASE PROVIDE THE SAME INFORMATION PROVIDED IN RESPONSE
2 TO PA-II-7 FOR THE PEAK MONTH EXPERIENCED DURING FY 2017.
3 RECONCILE THE RESPONSE WITH THE DATA PROVIDED IN RESPONSE
4 TO PA-VII-11.

5 **RESPONSE:**

6 The peak hourly rate of water demand experienced by PWD during FY 2017 occurred on July
7 23, 2016. Attachment PA-IX-2 provides the hourly volume of water treated by all three PWD
8 Water Treatment Plants for the month of July 2016 and the output from each Plant. As noted
9 in the response to PA-II-7, these numbers do not represent the demand of the water system as it
10 does not incorporate the addition to or subtraction from storage in the distribution system.
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27 **RESPONSE PROVIDED BY:** Donna Schwartz, Philadelphia Water Department and Black &
28 Veatch Management Consulting, LLC

1 **PA-XI -3.** PLEASE PROVIDE A COMPARISON OF THE WATER COST OF SERVICE
2 ALLOCATED TO EACH CUSTOMER CLASS AND THE REVENUES
3 PROPOSED TO BE COLLECTED FROM EACH CLASS FOR EACH FY (2019-
4 2021), OR IDENTIFY WHERE SUCH A COMPARISON CAN BE FOUND IN
5 WCOS17-19.XLS.

6 **RESPONSE:**

7 A comparison of the projected annual water cost of service billings allocated to each customer
8 class and the billing by customer class prior to the lag factor is provided on pages 791 to 795 of
9 PWD Exhibit 6.

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11 Note that the projected annual revenues proposed to be collected are based on receipts which
12 reflect payments of billings from the current and prior years. Since the projected test year
13 revenues includes the payment of billings from prior years, the cost of service analysis
14 provides a comparison of the cost of service rates prior to adjusting for receipts.

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16 In addition, as noted in PWD Statement 9A on page 121 (lines 1 to 6), the cost of service
17 utilized for rate design is adjusted based on annualizing the 10-month period for which the
18 proposed rates are effective. The annualized cost of service utilized for rate design should not
19 be compared to revenues proposed to be collected from each customer class during the test
20 years, since the revenues to be collected reflect the September 1st implementation of proposed
21 rates.

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28 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC