

BEFORE THE  
PHILADELPHIA WATER, SEWER AND STORMWATER RATE BOARD

Re Application of the Philadelphia Water Department for Increased Rates and Related Charges	Fiscal Years 2019-2021
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**PHILADELPHIA WATER DEPARTMENT’S OBJECTIONS TO  
PUBLIC ADVOCATE DISCOVERY REQUESTS**

These Objections are submitted on behalf of the Philadelphia Water Department (“Department” or “PWD”), by the undersigned counsel, in response to the following interrogatory and request for production of documents (“Discovery Request”) propounded by the Public Advocate as PA-IX-23 for the reasons stated below:

**Discovery Request - 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 last three base rate cases.

**Objection**

Objection. The Department objects to this interrogatory and request for production of documents to the extent it seeks information from almost a decade ago and prior to the establishment of the Rate Board. The regime of ratemaking prior to the Rate Board, while historically interesting, is not relevant to the subject matter and claims in this action, and as such, is not reasonably calculated to lead to the discovery of admissible evidence. This request is also made in combination with numerous other data requests (almost 350 in the aggregate) which require the Department’s attention for more substantive issues. The scope of this request is appropriately limited to rate case expenses related to the 2016 and 2018 rate proceedings.

WHEREFORE, the Department formally objects to the Discovery Request identified above and requests that its Objection be sustained and that it be relieved of the requirement of any further response to same except as described above.

Respectfully submitted,

/s/ Andre C. Dasent

ANDRE C. DASENT, ESQUIRE  
Attorney for Philadelphia Water Department  
1500 Market Street, 12<sup>th</sup> Floor  
Philadelphia, Pennsylvania 19102  
(215) 625-0555

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