

**BEFORE THE
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD**

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater and Stormwater Rates and Related Charges	Fiscal Years 2019-2021
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**PHILADELPHIA WATER DEPARTMENT'S INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS DIRECTED TO THE PUBLIC ADVOCATE
(SET III)**

Pursuant to the Hearing Officer's Procedural Rules for this Rate Proceeding, the Philadelphia Water Department ("Department" or "PWD") requests that the Public Advocate provide full and complete answers to the following interrogatories and requests for production of documents within seven (7) calendar days of service hereof.

Instructions and Definitions

1. Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession and control or custody of the Public Advocate or its consultants.
2. Each answer shall restate the question and identify the name and affiliation of the individual answering the interrogatory.
3. Copies of all answers shall be provided in PDF and/or XLS format via email.
4. Answers to these interrogatories and requests for production of documents shall be made in accordance with the Hearing Officer's Procedural Rules applicable to this rate proceeding.

Interrogatories

PWD-III-1. With respect to the testimony of Lafayette Morgan (PA Statement 1) please provide the workpapers and model supporting his testimony and exhibits.

PWD-III-2. With respect to Jerome Mierzwa's testimony (PA Statement 2 at page 15), please explain how the system maximum hour demand is utilized to develop the customer class extra capacity factors, as presented in Schedule JDM-1.

PWD-III-3. With respect to Roger Colton's testimony (PA Statement 3 at pages 97-106), please provide sources and references for each of the following charts: (i) Chart 1 – Household Income by Housing Type; (ii) Chart 2 – Percentage of PWD Customers by Housing Values by Annual Income; (iii) Chart 3 – Percentage of Homeowners and Tenants by HH Income; and Chart 4 – Percentage of PWD Notices of Disconnection for Nonpayment Not Resulting in DNPs.

PWD-III-4. With respect to Roger Colton’s testimony (PA Statement 3 at page 114), please provide the calculation and source documentation used to develop and derive the “Embedded Lost Revenue Adjustment of 13.1%” as described in Schedule RDC-3.

Respectfully submitted,

/s/ Andre C. Dasent

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