

**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 of
PennEnvironment Research & Policy Center**

The following instructions apply to these Interrogatories and Requests for Production of Documents:

1. *These interrogatories shall be deemed to be continuing. PennEnvironment is obliged to change, supplement and correct all answers to interrogatories to conform to available information, including such information as first becomes available to PennEnvironment after the answers hereto are served.*
2. *The answer should first restate the question asked and also identify the name and position of the individual who provided the answer.*
3. *Copies of all replies are to be provided in PDF and/or XLS format via email and/or on CDs.*
4. *Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession, control, or custody of PennEnvironment or may be reasonably ascertained thereby.*
5. *As used in these discovery requests, the following terms shall have the meanings provided below, unless the context clearly requires otherwise:*
 - a. *“Document,” “documentation,” or “workpaper” means and includes, but is not limited to, the original and all copies (regardless of origin and whether or not including additional writing thereon or attached thereto) of memoranda, reports, books, manuals, instructions, directives, records, forms, notes, letters, notices, confirmations, telegrams, pamphlets, bulletins, transcripts, diaries, analyses, spreadsheets, calculations, presentations, summaries, correspondence and enclosures, circulars, opinions, studies, investigations, questionnaires, surveys, drawings, graphs, charts, photographs, and notations of any sort (including, e.g., concerning conversations, telephone calls, meetings or other communications), and all drafts, preliminary versions, alterations, modifications, revisions, changes, amendments and written comments concerning the foregoing, in whatever form stored or contained in or on whatever medium including computerized memory or magnetic media.*
 - b. *“PWD” or “Department” as used herein includes Philadelphia Water Department, Philadelphia Water Revenue Bureau (WRB), and their attorneys, agents, employees, or other representatives.*

**Reference the Direct Testimony of Stephanie Wein on Behalf of PennEnvironment
Research & Policy Center, Dated April 20, 2018**

PA-PE-1. On page 5, lines 4 through 6, Ms. Wein states, “[b]y seeking matching funds from property owners, the programs reduce the cost to the taxpayer when compared for retrofitting a similar amount of impermeable acreage on publicly owned land.”

- a. Please provide the documentation that Ms. Wein used to support her claim that the cost to the taxpayer is higher for retrofitting a similar amount of impermeable acreage on publicly owned land.
- b. If not previously provided, please provide any independent study conducted by Ms. Wein that determines and compares the cost to the taxpayer of retrofitting impermeable acreage on publicly owned land versus privately owned non-residential property.

PA-PE-2. Does Ms. Wein believe that PWD’s ratepayers and Philadelphia taxpayers are identical groups?

PA-PE-3. Ms. Wein states on page 5, lines 20 to 23, that “[t]he proposed rate increases would help expand SMIP and GARP grantmaking ability, which is necessary for the city of Philadelphia to reduce combined sewer overflow, minimize flooding and protect our water. If we want the infrastructure to keep our waterways clean, we have to support it.” Please provide a listing of other means or programs for keeping the waterways clean that Ms. Wein has studied or analyzed.

PA-PE-4. Does Ms. Wein believe the SMIP/GARP is the only means of achieving clean waterways? If no, please identify the other means of achieving that goal of which Ms. Wein is aware.

PA-PE-5. Does Ms. Wein agree that the City of Philadelphia can contribute to achieving clean waterways through retrofitting or increasing the retrofitting of publicly owned impermeable land? If yes, please identify where Ms. Wein has ever advocated for such programs.

PA-PE-6. Does Ms. Wein believe it is better to retrofit privately owned impermeable land versus publicly owned impermeable land? Please fully explain your response.

PA-PE-7. Provide any studies Ms. Wein has participated in that evaluate the impact of SMIP/GARP.

PA-PE-8. Has Ms. Wein conducted a cost of service study to support the claim that “the proposed rate increases would help expand SMIP and GARP grant-making ability” (page 5, lines 20 to 21)? If so, please provide a copy.

PA-PE-9. On page 4, lines 19 through 20, Ms. Wein states that “combined sewage overflows have been reduced by 1.5 billion gallons annually.” With respect to this statement:

- a. Please provide the source information and supporting calculations.
- b. Please indicate how much of the purported 1.5 billion gallons of reduced sewage overflows are attributable to SMIP projects.
- c. Please indicate how much of the purported 1.5 billion gallons of reduced sewage overflows are attributable to GARP projects.
- d. Please indicate how much of the purported 1.5 billion gallons of reduced sewage overflows are attributable to public green stormwater infrastructure projects initiated by PWD or one of its partners.
- e. Please indicate how much of the purported 1.5 billion gallons of reduced sewage overflows are attributable to private development in compliance with Philadelphia’s stormwater regulations (PWD Regulations Chapter 6).
- f. Please indicate how much of the purported 1.5 billion gallons of reduced sewage overflows are attributable to other factors, not listed in PA-PE-9(b) through (e), and provide a list of such factors.