

**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

**Philadelphia Large Users Group's ("PLUG")
Interrogatories & Requests for Production of Documents
To the Public Advocate**

Pursuant to the Hearing Officer's Procedural Rules for this Rate Proceeding, the Philadelphia Large Users Group's ("PLUG") requests that the Public Advocate provide full and complete answers to the following interrogatories with 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

- PLUG-PA-1 Please provide a working spreadsheet version of Mr. Mierzwa's revised class cost of service study that he summarized on page 16, Table 1, of his Direct Testimony. Please provide all supporting work papers, assumptions, and documentation. In addition, please provide a printout of all pages, schedules, and tables from this revised class cost of service study in pdf format.
- PLUG-PA-2 Please refer to page 13, lines 21 through 22 of Mr. Mierzwa's Direct Testimony. Please provide the basis for the statement that PWD's CCOS reflects a maximum day demand that is 140 percent of average day demand. Provide all calculations, work papers, and supporting documents.
- PLUG-PA-3 Please refer to page 14, lines 3 through 4 of Mr. Mierzwa's Direct Testimony. Please provide the basis for the statement that PWD's CCOS reflects a maximum

hour demand that is 190 percent of average day demand. Provide all calculations, work papers, and supporting documents.

PLUG-PA-4 Please refer to page 14, lines 4 – 7 of Mr. Mierzwa’s Direct Testimony. Please provide the basis for the statement that “PWD’s CCOS study 6 relies on a maximum day that is 125 percent of average day rather than the 130 percent 7 discussed in PWD Statement No. 9A. Provide all calculations, work papers, and supporting documents.

PLUG-PA-5 Please provide a working spreadsheet version of Schedule JDM-1. Provide all supporting work papers and documents used by Mr. Mierzwa in the development of this Schedule.

PLUG-PA-6 Please refer to page 14, line 23 through page 24, line 4 of Mr. Mierzwa’s Direct Testimony.

- a. Please explain in detail why Black and Veatch’s development of extra capacity factors is incorrect based on Mr. Mierzwa’s reading of the AWWA manual.
- b. Is it Mr. Mierzwa’s view that his calculation of extra capacity factors is the only correct approach? Are there other approaches that could be used that would also be consistent with the AWWA manual?

PLUG-PA-7 Please refer to Schedule JDM-1.

- a. Provide the 2014 – 2018 average numbers cited in footnote (a).
- b. Explain why Mr. Mierzwa used a weekly average adjustment in Column (3).
- c. Provide the derivation of the numbers used in Column (1).

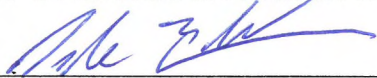
PLUG-PA-8 a. Provide the impact on other rate classes from Mr. Mierzwa’s alternative recommendation in which the rates in the 0 -2 Mcf usage block are held constant and the other usage blocks receive the entire revenue increase assuming the Company’s requested increase of \$116 million is granted. Provide all supporting work papers and documentation.

- b. Provide the impact described above assuming increases of \$100 million and \$50 million. Provide all supporting work papers and documentation.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By



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