

**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 2017-2018 Rates**

**Public Advocate's Interrogatories & Requests for Production of Documents**

Instructions: Please respond to the following Interrogatories and Requests for Production of Documents. Please repeat the interrogatory and provide the name of the person providing the response. Please provide copies of all replies in PDF and/or XLS format via email and/or on CDs.

PA-EXE-79. For each of the past three years, please provide:

- a. System average day production;
- b. System maximum day production; and
- c. System maximum hour production.

PA-EXE-80. Please explain how frequently the meters of each customer class are read.

PA-EXE-81. Please explain whether private fire services are normally serviced by service lines similar to water services. If not, please explain the service connection arrangements.

PA-EXE-82. Please explain whether service line investment has been allocated to private fire protection service. If no, why not?

PA-EXE-83. Does PWD provide free service to any customers? If yes, please identify the customers and the annual volumes and reason for free service.

PA-EXE-84. Please provide a copy of PWD's most recent long-term water supply plan.

PA-EXE-85. Please provide a representative sample of the bills of residential customers.

PA-EXE-86. Please provide an estimate of the quantity of water used for public fire-fighting for each of the last three years.

- PA-EXE-87. Reference page 55 of PWD St.-9A. Please provide a detailed explanation as to how the 77 Base/23 percent maximum day, and 58 Base/14 maximum day/28 maximum hour percentages were calculated. Include supporting calculations.
- PA-EXE-88. Reference Table 11-W of PWD St.-9A:
- a. For each customer type reflect in Tabled 11-W, please provide monthly sales for the most recent 36-month available in Excel format;
  - b. Please identify what PWD considers to be a reasonable weekly usage adjustment factor for each class (see Appendix A, page 2317 of the AWWA M-1 Manual); and
  - c. Please identify what PWD considers to be a reasonable estimated MH/MD ratio for each class (per Appendix A, page 318, of the AWWA M-1 Manual).
- PA-EXE-89. Reference Table 11-W of PWD St.-9A. Please explain in detail how the maximum day and maximum hour capacity factor for each class was determined (including public and private fire). Include supporting calculations and documentation.
- PA-EXE-90. Reference Table 17-W of PWD St.-9A. Please explain in detail why the high pressure fire system was reallocated entirely to the residential class.
- PA-EXE-91. Reference Table 17-W of PWD St.-9A. Please describe the Hand Billed customer type.
- PA-EXE-92. Reference PWD Exhibit-6, page 5. If not provided in response to PA-EXE-74, please provide a copy of referenced Excel files FINPLAN15.XLS, WCOS15\_2017.XLS and SCOS15\_2017.XLS.
- PA-EXE-93. Reference page 88 of PWD St.-9A. Please explain the basis for using 95 percent of the water sales for each customer type to determine wastewater volumes. Provide all supporting workpapers and calculations.
- PA-EXE-94. Please explain why it would be unreasonable to use average annualized winter-month water sales for wastewater volumes for residential customers.

- PA-EXE-95. Please provide a copy of the study discussed on page 75 of PWD St.-9A which found for the PWD's collection system, 30 percent was for sanitary flow and 70 percent was for storm water.
- PA-EXE-96. Reference page 89 of PWD St.-9A, Treatment-Capacity. Please provide the basis for each of the referenced ratios (times). Provide supporting calculations and documentation.