

**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-163. Reference Exhibit BV-E1, Table W-10. Please provide a detailed breakdown for expense line items 5 and 8.
- PA-EXE-164. Reference Exhibit BV-E1, Table W-11 and the response to PA-EXE-86. If the 55 MG/yr identified in PA-EXE-86 were to be included in Table W-11, would the correct units on Table W-11 be 55,000 Mcf? If no, please identify the correct units that would be identified on Table W-11.
- PA-EXE-165. Reference the response to PA-EXE-89. Please explain the basis for using two simultaneous fires, one using 10,000 gpm and the other using 5,000 gpm. Are the use of fires of this magnitude consistent with ISO standards for water systems? Provide supporting documentation.
- PA-EXE-166. What is the population of PWD's water service territory?
- PA-EXE-167. Reference Exhibit BV-E1, Table W-11.
- a. Does the PWD agree that the maximum-day and maximum-hour system diversity factors (as calculated in Appendix A of the AWWA's M-1 Manual) associated with the class capacity factors identified on Table W-11 significantly exceed the typical range of 1.10 to 1.40?
 - b. If the response to subpart (a) is no, please provide the PWD's calculated maximum-day and maximum-hour system diversity factors;
 - c. If the response to subpart (a) is yes, please explain why it is reasonable for the diversity factors to exceed 1.40.

- PA-EXE-168. Reference the response to PA-EXE-91. Please explain why these customers are hand billed and what it means to be hand billed.
- PA-EXE-169. Reference Exhibit BV-E1, Table WW-8.
- a. Please explain the type of service provided to the Groundwater customer type and why there are no meter or billing units for these customers; and
 - b. Please explain what the 2,660 Mcf test year volume for fire meters represents.
- PA-EXE-170. Reference Exhibit BV-E1, Table 11, Part 1. Please explain in detail what the O&M Storm Costs (\$53,056,200); Depreciation Expense (\$17,495,000); and return (\$45,222,000) represent and how they were calculated. Provide supporting calculations.
- PA-EXE-171. Reference Exhibit BV-E1, Table 11, Part 2.
- a. Please explain in detail how the Stormwater billing expense (\$13,958,144) and Direct Stormwater Expense (\$2,893,000) were calculated. Provide supporting calculations.
 - b. Please explain whether the Stormwater billing expense of \$13,958,144 should be the same billing expense of \$13,953,000 reflected on Exhibit BV-E3, Table SW-13.
- PA-EXE-172. Reference Exhibit BV-E3, Table SW-13. Please explain in detail how the \$139,736,000 in Impervious Area and Gross Area costs were calculated. Provide supporting documentation.
- PA-EXE-173. Reference Exhibit BV-E1, Table WW-14. Please explain why 70 percent of the costs associated with I/I pumping and treatment is allocated to stormwater but no I/I conveyance costs are allocated to stormwater.
- PA-EXE-174. Reference PWD Statement 9B, page 11, Q/A 16. Please explain in detail whether the PWD's system of stormwater credits has reduced the volume of stormwater requiring treatment by PWD. Provide supporting documentation and/or studies.