

**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-RDC-1. Reference paragraph 13.j. of the Joint Petition for Settlement of Phase 1 of the FY 2013-2016 Rate Proceeding (“[b]efore proposing the implementation of permanent new rates using a rate setting methodology that projects the Department’s revenue requirement over a period longer than one single fiscal year, the Department shall convene a collaborative workshop with Community Legal Services and respective Department and CLS experts, with the goal of agreeing upon an appropriate methodology to set budget and growth factors for use in its rate filing”), adopted and confirmed by PWD Commissioner on December 7, 2012:

- a. Please confirm the Department did not convene the aforementioned workshop in advance of submitting the Advance Notice.
- b. Please provide any anticipated date on or by which the Department intends to convene such workshop in advance of the Formal Notice.

PA-RDC-2. Reference the Side Letter dated September 28, 2012 between PWD and CLS, serving as Public Advocate. Please provide the final report of the Management Audit referenced in paragraph 7 of the Side Letter.

PA-RDC-3. Reference Attachment D to the Joint Petition for Settlement of Phase 1 of the FY 2013-2016 Rate Proceeding (“Stipulation to Mediation Between PWD/WRB and PA”).

- a. Please state whether the Department intends to respond to the Mediation Report regarding Tenant and Application Issues, submitted to the Commissioners on December 11, 2015.
- b. If the answer to the forgoing is yes, please provide the anticipated date on or by which the Department intends to so respond.
- c. Please provide the anticipated date on or by which the Department intends to commence mediation of the topic “delivery of deferred payment agreements” described in paragraph 6 of Attachment D.