

**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.

*With regard to the Figure 6 of the Rate Case Assumptions:*

PA-ID-1. Please provide the components of the Additional Basis<sup>2</sup> support cost.

PA-ID-2. Please provide a breakdown of the facilities administration costs that was inadvertently dropped from the FY 2016 budget.

PA-ID-3. Please provide a breakdown of the \$0.8 million additional staffing costs for the Operations Division that are required after completion of plant expansion. In your response identify the related plant.

PA-ID-4. Please provide the components that comprise the additional one-time maintenance costs for the Operations Division of \$1.3 million, \$1.2 million and \$0.1 million for 2017, 2018 and 2019, respectively.

PA-ID-5. Please provide supporting documentation showing the derivation of the phosphoric acid costs and the parts for equipment repair.

- a. In your response please provide the reason for the use of phosphoric acid and why phosphoric acid does not appear as one of the chemicals normally used in the Operations Division's budget for FY 2014, 2015 and 2016.
- b. Please provide support for the pricing used for the phosphoric acid.

PA-ID-6. For the Operations Division, please identify the Class 300 equipment to be repaired. In your response, explain how it is now known that this equipment will need to be repaired.

PA-ID-7. For the Operations Division, please identify the additional Class 400 equipment of \$0.1 million; explain the purpose for the equipment.

PA-ID-8. Please provide a breakdown of the additional staffing costs for the Office of Watersheds.

PA-ID-9. Please identify the components and the related costs of the additional stormwater facilities maintenance costs. In your response please identify the facilities related to this adjustment.

PA-ID-10. Please provide a breakdown of the additional staffing costs for the sewer lateral inspection program. In your response, identify each position that is included in the costs and the reason each position is required.

PA-ID-11. Please provide the supporting documentation showing the derivation of the \$2.3 to \$3.6 million of pension, pension obligation and benefits costs. In your response, show the additional pension, pension obligation, and benefits cost related to each additional staffing position as indicated in the description.

PA-ID-12. Please provide a breakdown of the additional staffing costs for the Affordability Program.

PA-ID-13. Please provide a breakdown of the additional space requirements cost for the Affordability Program.

*With regard to full-time positions for the Operations department:*

PA-ID-14. Please explain the \$4,951,500 increase in the obligation level between FY 2016 and FY 2015 even though there is no budgeted increase in the number of positions.