

**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**

**Philadelphia Large Users Group's ("PLUG")
Interrogatories & Requests for Production of Documents from
the Philadelphia Water Department ("PWD")**

Instructions: Please respond to the following Interrogatories and Requests for Production of Documents as soon as possible, but no later than seven (7) days from the date of service. 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.

- PLUG-1 Please identify the PWD staff members responsible for addressing customer service and/or billing inquiries from Large C&I customers.
- PLUG-2 Please confirm whether or not each individual identified in response to PLUG-1 is exclusively or primarily tasked with addressing customer service and/or billing inquiries from PWD's Large C&I customers.
- PLUG-3 Please reference page 177, lines 10-12, of the Official Transcript from the February 22, 2016, Technical Hearing. Please provide all available documentation describing the referenced "call center initiative."
- PLUG-4 Please reference page 177, lines 14-19, of the Official Transcript from the February 22, 2016, Technical Hearing. Please provide all available information regarding PWD's efforts to cross-train PWD and Water Revenue Bureau personnel.
- PLUG-5 Please reference the Response to PA-EXE-106, stating "the RSF was established in conjunction with the Series 1993 Revenue Bonds to provide funds to cover annual expenditures when the revenues are less than projected and to prevent the need for large swings in rates year to year. "
- a. Please provide a schedule showing the revenue projections for years 2013-2015 applied to determine when revenues are "less than projected" for purposes of authorizing disbursements from the Rate Stabilization Fund.
 - b. Please confirm whether PWD can draw down the Rate Stabilization Fund solely to cover revenues shortfalls or whether PWD can also draw down the Rate Stabilization Fund to cover new expenses that were not included in prior revenue projections.

PLUG-6 Please reference the response to PA-EXE-58, showing actual Rate Stabilization Fund balances for Fiscal Years 2013, 2014, and 2015, in excess of projected balances by \$62,726, \$106,443, and \$131,785, respectively.

PLUG-7 Is the process for projecting the Rate Stabilization Fund balances reported for Fiscal Years 2016-2018 in Table C-1 to Exhibit BV-E1 consistent with that used to develop the prior projections for Fiscal Years 2013-2015 reported in the response to PA-EXE-58?

PLUG-8 Please reference page 44, lines 22-24, of the Official Transcript of the February 22, 2016, Technical Hearing before the Water Rate Board. Here PWD Witness David A. Jagt represents that PWD has "an agreement or covenant that the water fund will meet 90 percent of debt service from current revenues."

- a. Please provide a copy of the referenced agreement or covenant.
- b. Please confirm whether the referenced agreement or covenant limits total Rate Stabilization Fund withdrawals to 10% of debt service.
- c. Please confirm whether the 10% threshold includes transfers from the Residual Fund.
- d. Please confirm whether, in a year where PWD has already met the 10% debt service threshold for Rate Stabilization Fund withdrawals, it could withdraw additional amounts from the Rate Stabilization Fund to address other expenses, such as revenue shortfalls due to declining sales.

PLUG-9 Please reference Table C-1 to Exhibit BV-E1, row 10.

- a. Please confirm whether the requested revenue increases for Fiscal Years 2017 and 2018 include costs associated with an Income-Based Affordability Program authorized by Philadelphia City Council Bill No. 140607.
- b. To the extent PLUG-9(a) is answered in the affirmative, please identify the total cost of the Income-Based Affordability Program.
- c. To the extent PLUG-9(a) is answered in the affirmative, please provide the anticipated cost allocation and rate design for costs associated with the Income-Based Affordability Program.