

**BEFORE THE
PHILADELPHIA WATER, SEWER, AND STORM WATER RATE BOARD**

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater, and Stormwater Rates and Related Charges : **Fiscal Years 2022 – 2023 Rates and Charges to Become Effective September 1, 2021 and September 1, 2022**

**PUBLIC ADVOCATES DISCOVERY REQUESTS
&
REQUESTS FOR PRODUCTION OF DOCUMENTS**

SET IV

- PA-IV-1. Reference Statement No. 7A, Q/A 12. Please provide a complete copy of the analysis supporting the development of Step 1: The Projections of Gross Billings in Excel format with all formulas intact.
- PA-IV-2. Reference Statement No. 2, Q/A 46. Please provide a complete copy of the analysis supporting the change in the Stormwater Management Fee in Lieu of Charges.
- PA-IV-3. Reference Statement No. 7A, page 38, lines 7-17. Please provide the analysis/documentation supporting the claim that total IA increased by 87.5 million sq. ft. and residential IA increased by 72.5 million sq. ft.
- PA-IV-4. Reference Statement No. 7A, page 39, lines 1-25. Please identify the impact of stormwater credits on total residential, and non-residential GA and IA from those used to set rates in the two prior cases.
- PA-IV-5. Please identify each stormwater credit GA and IA adjustment authorized for the last three years. Identify for each adjustment, the customer's GA and IA before the adjustment and after the adjustment.
- PA-IV-6. Reference Table W-10:
- a. Please provide a detailed breakdown of line items 3, 7, and 11; and
 - b. Please provide a representation example of the invoices for purchased gas expenses.

- PA-IV-7. Reference Table WW-14. Please explain how the percentages in footnote (a) were determined. Provide supporting workpapers and calculations.
- PA-IV-8. Reference Tables SW-3 SW-4, and SW-5. Please provide actual data for the last five years for each table.
- PA-IV-9. Reference Table SW-5. Please provide a detailed explanation of line items 1-3 and 5-7.
- PA-IV-10. Reference Table SW-12. Please provide actual data for the last five years.
- PA-IV-11. Please provide copies of the Company's water, wastewater, and stormwater cost of service studies in Microsoft Excel format with all formulas intact. Also, include all supporting schedules and workpapers in Excel format with all formulas intact.
- PA-IV-12. Please explain in detail any changes in the cost allocation and rate design methodologies since the last proceeding.
- PA-IV-13. Please explain in detail the basis for any changes in the water customer class demand factors compared to the last proceeding.
- PA-IV-14. For each of the past three fiscal years, please provide for the water system:
- a. System average day production;
 - b. System maximum day production; and
 - c. System maximum hour production.
- PA-IV-15. Please provide a copy of PWD's most recent long-term water supply plan.
- PA-IV-16. Please provide an estimate of the quantity of water used for public firefighting for each of the last three years.
- PA-IV-17. For each customer class reflected in the water class cost of service study, please provide monthly sales for the most recent 36-month available in Excel format.

- PA-IV-18. Please explain in detail how the maximum day and maximum hour capacity factor for each class in the water class cost of service study was determined (including public and private fire). Include supporting calculations in Excel format.
- PA-IV-19. Please identify the annual quantities of non-revenue water by type for the most recent three-year period available. Also, identify annual water production for the same five annual periods.
- PA-IV-20. Since its last case, has the PWD conducted a comprehensive holistic review of its rate structure for water service under which separate rate schedules were considered for certain customer classes? If no, why not? If yes, please describe this review in detail and present all results and findings of the review.
- PA-IV-21. Please provide an estimate of the revenue reductions resulting from stormwater credits for the last five fiscal years.
- PA-IV-22. Please provide a copy of any studies performed by the Department that evaluate the extent to which the stormwater credit program has reduced stormwater volumes.
- PA-IV-23. Reference Schedule BV-4. Please provide the workpapers and calculations supporting each newly calculated charge.
- PA-IV-24. What is the population of PWD's water service territory?
- PA-IV-25. Reference BV-1, Table W-10. Please identify by line-item number, the costs associated with water quality testing reflected in test year O&M expense.
- PA-IV-26. Please identify the frequency with which PWD performs each water quantity test and the criteria which determine how frequently each water quality test should be performed (i.e., daily weekly production quantity, etc.).
- PA-IV-27. In the wastewater cost of service study, please explain how the costs associated with I/I are allocated to each customer type.
- PA-IV-28. Reference BV-1, Table W-10:

- a. Please identify labor expense by line item; and
- b. Please identify the extent to which treatment plant labor expense would increase on a maximum day to an amount higher than that experienced on an average day.

PA-IV-29. Reference Table W-11, footnote (c). Please identify how the average day, maximum day, and maximum hour demands for fire protection service were determined in the cost of service studies prepared by B&V personnel for the five service territories with the number of customers most comparable to the Philadelphia Water Department over the last five years.