

**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 2021-2022 Rates**

Public Advocate's Interrogatories & Requests for Production of Documents

SET VI

- PA-VI-1. Reference the response to PA-ADV-1.
- a. Please explain why the actual to budget factor for Finance Class 800 Expenses is calculated using a method that is different than the method used for the other classes of expenses.
 - b. Please explain the rationale of applying the average two year spend factor to the prior budget amount and dividing by the current budget amount. In other words, what does this measure or capture that the approach used for the other expenses does not?
- PA-VI-2. Reference the response to PA-ADV-2.
- a. Please the monthly fire hydrant testing expense for the period October 2019 through February 2020.
 - b. Please provide, as a sample copy, the fire hydrant testing invoice for the months of August and September 2019.
- PA-VI-3. Reference the response to PA-ADV-3. Please provide the supporting calculation of the Net Interest Cost for each bond issue. In your response, please clearly identify the coupon rate for each bond issuance.
- PA-VI-4. Reference Black & Veatch, Schedule BV-6: WP-1, page 6. Please explain whether the assumed interest rate of 5.25% is based on the Net Interest Cost, or whether it is the assumed coupon rate.
- PA-VI-5. Reference Black & Veatch Schedule BV-6: WP-1, page 9.
- a. Please provide the basis and the supporting documentation showing the derivation of the Storm Flood Relief expenditures presented on Table 7. In your response please identify the projects that make up the \$15,000,000 annual amount for FY 2021 and FY 2022.

- b. Please explain the reason for the increase in annual expenditures by \$5,000,000.

PA-VI-6. Reference Black & Veatch Schedule BV-6: WP-1, page 9.

- a. Please provide the basis and the supporting documentation showing the derivation of the Green Infrastructure expenditures presented on Table 7. In your response please identify the projects that make up the \$72,000,000 annual amount for FY 2021 and FY 2022.
- b. Please explain the reason for the increase in annual expenditures by \$10,000,000 beginning in FY 2020.

PA-VI-7. Reference Black & Veatch Schedule BV-6: WP-1, page 9.

- a. Please provide the basis and the supporting documentation showing the derivation of the Engineering and Administration expenditures presented on Table 7. In your response please identify the projects that make up the annual amount for FY 2021 and FY 2022.
- b. Please explain the reason for the annual decrease in Engineering and Administration expenditures presented on Table 7.

PA-VI-8. Reference Black & Veatch Schedule BV-6: WP-1, page 9.

- a. Please provide the basis and the supporting documentation showing the derivation of the Reconstruction of Sewers expenditures presented on Table 7. In your response please identify the projects that make up the annual amount for FY 2021 and FY 2022.
- b. Please explain the reason for the increase in the Reconstruction of Sewers expenditures presented on the table during FY2021.

PA-VI-9. Reference Black & Veatch Schedule BV-6: WP-1, page 9. Please explain the decrease in large meter replacement from FY 2020.

PA-VI-10. Please show how the 3.0% was derived from the data presented in Appendix H, of Black & Veatch Schedule BV-6: WP-1, page 29.

PA-VI-11. The response to PA-ADV-9, states that “[e]scalation rates were based on consultation and advice with the City’s energy procurement consultant and information from market conditions”. Does this mean the stated percentage increase in the memo presented in Appendix I of Black & Veatch Schedule BV-6: WP-1 is the opinion of the writer? If not, please provide documentation showing how the 3% increase in electricity and natural gas costs were determined.

PA-VI-12. Please provide the payroll distribution showing the percentage of wages charged to O&M, capital and other categories for FY 2017, FY 2018 and FY 2019.

PA-VI-13. For FY 2017 through FY 2022, please provide the monthly number of budgeted positions, the number of filled positions, and the monthly number of employees that left the Department.

PA-VI-14. Please state whether the budgeted payroll included in FY 2021 and FY 2022 assumes all budgeted positions are filled for the full year. If not, please explain how budgeted positions, filled positions and vacancies are reflected in the cost of service for FY 2021 and FY 2022. Your response should also explain how the Company has treated routine or normal position vacancies which occur as a result of terminations or retirements in its budgeted labor projections.

PA-VI-15. Please provide the following monthly labor data for FY 2017 through FY 2020 through the most recent month available.

- a. The number of actual employees broken down between type (e.g., salaried, union, non-union, temporary, etc.);
- b. The regular payroll broken down between expensed, capitalized and other;
- c. The overtime payroll broken down between expensed, capitalized and other; and
- d. The temporary payroll broken down between expensed, capitalized and other.

PA-VI-16. Reference the file WCOS19_21_rates.xls, tab Wpltallo, cells D158-D159. Please reconcile that average day demands with the average day demands provided in the response to PA-I-19.

PA-VI-17. Reference: Response to PA-III-6. Please provide copies of the files that are contained in the Response to PA-III-6 that are contained in the sub-directory labelled "macosx" (that won't open). In the alternative, please indicate whether the data in those files are replicative of the other Excel spreadsheets in the directory of response to PA-III-6, except in a non-Excel format.

PA-VI-18. Reference: Response to PA-III-25. In the set of responses marked "agency," please provide a detailed description of the data included in the "agency" set of responses. Indicate the difference between the data in the "agency" documents and in the "water" documents.

PA-VI-19. Reference: Response to PA-III-25. For each "postal zone" contained in each document, please define what geographic area that "postal zone" covers. Given that the geographic areas are listed by "postal zone," define each zone, if possible, in terms of what

zip code(s) are included. Define each postal zone by a geographic area other than zip code(s) only if zip codes are not available.

- PA-VI-20. Reference: Response to PA-III-29. While the response to PA-III-29 has a directory (presumably to contain attachments), there are no files in that directory. Provide all attachments to PA-III-29.
- PA-VI-21. Reference: Response to PA-III-30. In the set of spreadsheets contained for the directory of "weekly process" documents, please provide a detailed definition of what the term "decision" means in those documents? Indicate whether that term means that a decision was made about the eligibility or non-eligibility of an applicant. If the term "decision" refers to some other decision, indicate what the reference is to.
- PA-VI-22. Reference: PA-III-83. For each of the following presentations, please indicate who the presentation was made by, to whom the presentation was given, and the date of the presentation.: (a) The Brian Merritt (B&V) presentation; (b) the Phil TAP2 presentation; and (c) the "Reducing and Avoiding Disconnections" presentation.