RESPONSE TO
PUBLIC ADVOCATE’S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-108

FEBRUARY 17, 2021: THESE RESPONSES ARE PROVIDED AFTER NEGOTIATIONS BETWEEN THE PHILADELPHIA WATER DEPARTMENT (“PWD” OR “DEPARTMENT”) AND THE PUBLIC ADVOCATE (“PA” OR “ADVOCATE”) WITH REGARD TO PWD OBJECTIONS TO THE ADVOCATE’S INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS (SET I DISCOVERY).

PWD AND THE ADVOCATE (“PARTIES”) HAVE REACHED THE AGREEMENT, AS SUMMARIZED BELOW, TO RESOLVE ALL SET I DISCOVERY DISPUTES.

THE PARTIES SPECIFICALLY AGREE TO PRESERVE THEIR RIGHTS TO OBJECT TO OR ANSWER OBJECTIONS REGARDING SET I DISCOVERY IN THIS RATE PROCEEDING. FURTHER, THE PARTIES AGREE TO TREAT ALL ANSWERS/OBJECTIONS AND DOCUMENTS PROVIDED AS “RESPONSES” WHICH ARE SUFFICIENT, AS STATED, TO ANSWER THE ADVOCATE’S SET I DISCOVERY.

Dated: February 2021 (as revised on 2/17/2021)
Objections and Clarifications to Instructions/Definitions

The Department objects to the instructions and each interrogatory referring to “public-side lead service line” or “private-side lead service line” because the definitions provided in Set I by the Public Advocate are vague and confusing.

A lead service line may refer to (i) a lead pipe between the water main and the curb, (ii) a lead pipe between the water main and the premises, structure or meter, or (iii) both. EPA defines “lead service line” as a service line made of lead, which connects the water main to the building. However, the Philadelphia Plumbing Code defines “water service pipe” as the pipe from the water main to the curb stop. In Philadelphia, property owners having a connection to the City’s water system of 2 inches or less must maintain the connection in good repair at their own expense.

By way of further objection and clarification, customer-owned service lines are not part of the PWD system. This clarification applies to all responses concerning service lines. The Department’s regulations provide that PWD customers, with connections of 2 inches or less, are responsible for repairing the pipes and fixtures that carry water from the PWD water mains to their home (or business) and that carry wastewater (and/or and stormwater) from their home (or business) to the PWD sewer main in the street. This means that there is no public-side versus private-side distinctions for connection pipes of 2 inches or less (e.g., service lines or laterals) on the water system or the wastewater system. It also means that once drinking water leaves the PWD water main in the street, its safe delivery becomes the customer's responsibility.

The Department’s responses to Set I (1) using the term “lead lines” do not distinguish between “public-side lead service line” or “private-side lead service line,” consistent with the foregoing objection; and, (2) are limited to residential customers only, since the instructions provide that Set I will explicitly state if information or documents regarding nonresidential customers/service lines is being requested and none of the interrogatories and requests make an such an explicit request.
General Objections

1. The Department objects to each interrogatory and request to the extent that it seeks information that is not relevant to the proposed changes in PWD rates and charges as set forth in the rate filing, and as such, is not reasonably calculated to lead to the discovery of admissible evidence for purposes of rate setting.

2. By answering any part of the interrogatories and requests and/or by providing any part of the requested information, PWD does not concede the relevance, materiality or admissibility of any of the information sought therein for use as evidence in any hearing. PWD expressly reserves the right to object to further discovery on the subject matter and claims in any of these interrogatories and requests.

3. The Department objects to each interrogatory and request insofar as it seeks production or disclosure of documents or information subject to any applicable privilege (including government decision-making and deliberations; attorney-client privilege; and attorney work product), rule, doctrine or immunity whether created by statute or common law.

4. The Department objects to each interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

5. The Department objects to each interrogatory and request identified herein to the extent that they seek information that is not relevant and not material to the subject matter and claims of this proceeding, and as such, are not reasonably calculated to lead to the discovery of admissible evidence.

6. The Department objects to each interrogatory and request to the extent it is duplicative and cumulative.
7. The Department objects to each interrogatory and request to the extent that it seeks sensitive
and private information, the disclosure of which would violate federal, state or local law and/or
the privacy rights of persons not parties to this action.

8. The Department objects to each interrogatory and request to the extent it seeks information not
in PWD’s possession, custody and control, and to the extent it seeks documents which are already
in the possession of the Requestor or accessible to the Requestor or are a matter of public record.

9. The applicable general objections, as stated above (“General Objections”), are incorporated
into each of the specific objections and responses that follow. Stating a specific objection or
response shall not be construed as a waiver of these General Objections.
PA-I-1. PLEASE INDICATE WHETHER PWD HAS A PROGRAM THROUGH WHICH COMMUNITY MEMBERS CAN ACCESS ASSISTANCE TO REPLACE PRIVATE LEAD LINES. IF AND TO THE EXTENT SUCH A PROGRAM EXISTS, PLEASE PROVIDE:

A. THE POLICIES AND PROCEDURES FOR ELIGIBILITY AND ENROLLMENT IN THAT PRIVATE LEAD LINE REPLACEMENT PROGRAM; AND

B. A COPY OF PWD’S WRITTEN POLICIES, TRAINING MATERIALS, AND OTHER WRITTEN DOCUMENTS WHICH DESCRIBE THE POLICIES AND PROCEDURES FOR THE PRIVATE LEAD LINE REPLACEMENT PROGRAM.

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

A. Yes. Please refer to PWD Regulations, Sections 200.0 to 200.6, and “Programs for Lead Line Replacement” on the PWD webpage available at: https://www.phila.gov/water/wu/drinkingwater/lead/Pages/programs.aspx

B. Please see the response to PA-I-1-A.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-2. IF AND TO THE EXTENT PWD HAS A PRIVATE LEAD LINE REPLACEMENT PROGRAM, PROVIDE AN ITEMIZED BUDGET FOR THE PROGRAM FOR THE CURRENT FISCAL YEAR OR FOR THE IMMEDIATELY SUBSEQUENT FISCAL YEAR. REFERENCE REVENUE PROJECTIONS, ITEM 1(D). PLEASE EXPLAIN HOW THE COMMONWEALTH OF PENNSYLVANIA’S EXTENDED SHUT OFF MORATORIUM AFFECTS PWD’S USAGE PER ACCOUNT AND PROVIDE SUPPORTING DOCUMENTATION.

RESPONSE:

There are no separate line items in the budget for the Department’s lead line replacement programs. The expenditures for the lead line replacement programs are included in the budget for HELP, which has an annual budget of $7 million, or within the budget item Conveyance Reconstruction for water main reconstruction projects.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-3.  IF AND TO THE EXTENT THAT PWD HAS A PRIVATE LEAD LINE REPLACEMENT PROGRAM, PLEASE PROVIDE A DETAILED DESCRIPTION OF HOW PWD PROMOTES THE PROGRAM. SEPARATELY PROVIDE A COPY OF ALL WRITTEN CORRESPONDENCE AND/OR MARKETING MATERIALS USED TO INFORM CONSUMERS ABOUT THE AVAILABILITY OF THE PRIVATE LEAD LINE REPLACEMENT PROGRAM.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents provided to customers are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the information provided to customers and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the description and documents available on the PWD web page identified in the response to PA-I-1.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-4. BY MONTH, FOR EACH MONTH JANUARY 2018 TO PRESENT, PLEASE PROVIDE THE NUMBER OF CUSTOMERS WHO HAVE ENROLLED IN PWD’S PRIVATE LEAD LINE REPLACE PROGRAM, ALONG WITH THE CUMULATIVE NUMBER OF CUSTOMERS WHO HAVE ENROLLED IN THE PROGRAM.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The prior and existing enrollment is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between prior and existing enrollment and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The following number of customers have obtained HELP loans for replacing lead lines in the months indicated:

<table>
<thead>
<tr>
<th>Month</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jan</td>
<td>5</td>
<td>3</td>
<td>9</td>
<td>4</td>
</tr>
<tr>
<td>month</td>
<td>day</td>
<td>week</td>
<td>month</td>
<td>response</td>
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<td>-------</td>
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</tr>
<tr>
<td>Feb</td>
<td>4</td>
<td>2</td>
<td>1</td>
<td>n/a</td>
</tr>
<tr>
<td>Mar</td>
<td>13</td>
<td>2</td>
<td>5</td>
<td>n/a</td>
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<tr>
<td>Apr</td>
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<td>9</td>
<td>3</td>
<td>n/a</td>
</tr>
<tr>
<td>May</td>
<td>8</td>
<td>5</td>
<td>1</td>
<td>n/a</td>
</tr>
<tr>
<td>Jun</td>
<td>7</td>
<td>6</td>
<td>3</td>
<td>n/a</td>
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<tr>
<td>Dec</td>
<td>7</td>
<td>2</td>
<td>5</td>
<td>n/a</td>
</tr>
</tbody>
</table>

**RESPONSE PROVIDED BY:** Philadelphia Water Department
PA-I-5. PLEASE IDENTIFY THE NUMBER OF LEAD SERVICE LINES IN PWD’S SYSTEM.

RESPONSE:

This interrogatory and request are based on the incorrect assumption that service lines are part of the Department’s water system. The Department’s objections and clarifications to the instructions/definitions are incorporated herein by reference. As explained, Lead lines on either side of the curb stop are not considered as part of PWD’s system.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Philadelphia’s current inventory of approximately 480,000 service connections includes approximately 25,000 properties estimated to have lead lines. Please refer to pages 25-26 of PWD’s Submission of Comments Concerning National Primary Drinking Water Regulations: Proposed Lead and Copper Rule Revisions – Docket No. EPA-HQ-OW-2017-0300, attached as PA-I-5.pdf.

PWD has a record of 2,570 properties with a lead service pipe on either side of the curb stop. The above number of lead service lines is based on available records.

RESPONSE PROVIDED BY: Philadelphia Water Department
1  **PA-I-6.** PLEASE DESCRIBE HOW THE ESTIMATE IN THE IMMEDIATELY
2  PRECEDING RESPONSE WAS CALCULATED. PROVIDE ALL
3  DOCUMENTS RELIED ON IN PREPARING THE ESTIMATE, INCLUDING
4  ANY LEAD SERVICE LINE INVENTORIES.

5  **RESPONSE:**

6     The Department objects to this interrogatory and request on the grounds that the discovery
7  sought will cause unreasonable annoyance, burden and expense to the Department.
8  Compilation of information and documents being requested would require a costly and
9  burdensome special investigation to produce. This interrogatory and request are
10  potentially seeking a large amount of information and documents, since they would
11  require the compilation of records on approximately 480,000 service connections. This
12  interrogatory and request are particularly burdensome given the shortened period allotted
13  to compile discovery responses in this proceeding. The Department objects to this
14  interrogatory and request to the extent that it seeks confidential, privileged, proprietary or
15  other privileged information.

16     The proper scope of this proceeding is limited to the rates and charges proposed by the
17  Department. The information and documents relied upon on or otherwise used in
18  preparing the estimate are not pertinent to the prospective rates and charges for the Rate
19  Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The
20  Rate Board is empowered to approve, modify or reject proposed rates and charges. See,
21  Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority
22  over the Department. This interrogatory and request are not seeking information related to
23  the prospective rates and charges proposed for the Rate Period. The requested information
24  will not assist the Rate Board in determining the prospective rates and charges for the Rate
25  Period. No nexus has been established between estimate and the prospective rates and
26  charges proposed for the Rate Period.
Notwithstanding the above objections and the Department’s General Objections, and
without waiver thereof, the Department responds to this interrogatory and request as
follows:

The number of lead service lines is based on available records.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-7. IDENTIFY THE NUMBER OF GALVANIZED STEEL SERVICE LINES IN PWD’S SYSTEM.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The existence of galvanized steel service lines is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between existing galvanized steel service lines and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

PWD has records of 262 properties that are serviced by a galvanized steel pipe on either side of the curb stop.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-8. PLEASE DESCRIBE HOW THE ESTIMATE IN THE IMMEDIATELY PRECEDING RESPONSE WAS CALCULATED. PROVIDE ALL DOCUMENTS RELIED ON IN PREPARING THE ESTIMATE, INCLUDING ANY GALVANIZED STEEL SERVICE LINE INVENTORIES.

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon on or otherwise used in preparing the estimate are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between estimate and the prospective rates and charges proposed for the Rate Period.
Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The number of galvanized lines is based on available records.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-9. IDENTIFY THE NUMBER OF COPPER SERVICE LINES IN PWD’S SYSTEM.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The existence of copper service lines is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between existing copper service lines and the prospective rates and charges proposed for the Rate Period.

This interrogatory and request are based on the incorrect assumption that service lines are part of the Department’s water system. The Department’s General Objections and clarifications to the instructions/definitions are incorporated herein by reference.

Notwithstanding all of the above objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The Department has records of 136,544 properties that are serviced by a copper pipe on either side of the curb stop.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-10.  PLEASE DESCRIBE HOW THE ESTIMATE IN THE IMMEDIATELY
PRECEADING RESPONSE WAS CALCULATED. PROVIDE ALL
DOCUMENTS RELIED ON IN PREPARING THE ESTIMATE, INCLUDING
ANY COPPER SERVICE LINE INVENTORIES.

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery
sought will cause unreasonable annoyance, burden and expense to the Department.
Compilation of information and documents being requested would require a costly and
burdensome special investigation to produce. This interrogatory and request are
potentially seeking a large amount of information and documents, since they would
require the compilation of records on approximately 480,000 service connections. This
interrogatory and request are particularly burdensome given the shortened period allotted
to compile discovery responses in this proceeding. The Department objects to this
interrogatory and request to the extent that it seeks confidential, privileged, proprietary or
other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the
Department. The information and documents relied upon on or otherwise used in
preparing the estimate are not pertinent to the prospective rates and charges for the Rate
Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The
Rate Board is empowered to approve, modify or reject proposed rates and charges. See,
Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority
over the Department. This interrogatory and request are not seeking information related to
the prospective rates and charges proposed for the Rate Period. The requested information
will not assist the Rate Board in determining the prospective rates and charges for the Rate
Period. No nexus has been established between estimate and the prospective rates and
charges proposed for the Rate Period.
Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The estimate is based on available records.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-11. IDENTIFY THE NUMBER OF SERVICE LINES IN PWD’S SYSTEM OF UNKNOWN COMPOSITION.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The existence of service lines of unknown composition is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between existing service lines of unknown composition and the prospective rates and charges proposed for the Rate Period.

This interrogatory and request are based on the incorrect assumption that service lines are part of the Department’s water system. The Department’s General Objections and clarifications to the instructions/definitions are incorporated herein by reference.

Notwithstanding all of the above objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

This total number will vary depending on the parameters used to determine whether the lines on either side of the curb stop are of unknown composition. Approximately 457,000 properties have a portion of the lines on either side of the curb stop of unknown composition. However, various parameters may be used to determine whether a property is likely to have a lead line, including age of the building, age of the water main, size of the line and dates
of changes in the plumbing practices and code changes. Using these parameters, PWD estimates that for purposes of EPA’s proposed lead and copper rule revision approximately 257,000 properties could be classified as unknowns (estimate includes lead and copper services). See also pages 25-26 of PWD’s Submission of Comments Concerning National Primary Drinking Water Regulations: Proposed Lead and Copper Rule Revisions – Docket No. EPA-HQ-OW-2017-0300, attached as PA-I-5.pdf.

RESPONSE PROVIDED BY: Gary Burlingame
PA-I-12. PLEASE DESCRIBE HOW THE ESTIMATE IN THE IMMEDIATELY PRECEDING RESPONSE WAS CALCULATED. PROVIDE ALL DOCUMENTS RELIED ON IN PREPARING THE ESTIMATE.

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon on or otherwise used in preparing the estimate are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between estimate and the prospective rates and charges proposed for the Rate Period.
Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The estimate is based on available records.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-13. HAS PWD COMPLETED A MATERIALS EVALUATION TO IDENTIFY THE
COMPOSITION OF CONSTRUCTION MATERIALS PRESENT IN PWD’S
DISTRIBUTION SYSTEM AS DESCRIBED IN 40 C.F.R. §§141.86(A)(1),
14L.42(D)? PLEASE PROVIDE THIS EVALUATION AND ALL
DOCUMENTS RELIED ON IN PREPARING THE EVALUATION.

RESPONSE:
The Department objects to this interrogatory and request on the grounds that the discovery
sought will cause unreasonable annoyance, burden and expense to the Department.
Compilation of information and documents being requested would require a costly and
burdensome special investigation to produce. This interrogatory and request are
potentially seeking a large amount of information and documents, since they would
require the compilation of records on approximately 480,000 service connections. This
interrogatory and request are particularly burdensome given the shortened period allotted
to compile discovery responses in this proceeding. The Department objects to this
interrogatory and request to the extent that it seeks confidential, privileged, proprietary or
other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the
Department. The information and documents relied upon on or otherwise used in
preparing the material evaluation are not pertinent to the prospective rates and charges for
the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited
jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates
and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have
oversight authority over the Department. This interrogatory and request are not seeking
information related to the prospective rates and charges proposed for the Rate Period. The
requested information will not assist the Rate Board in determining the prospective rates
and charges for the Rate Period. No nexus has been established between the material
evaluation and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and
without waiver thereof, the Department responds to this interrogatory and request as
follows:

In 1992, the Department conducted a materials survey that is described in the documents
attached to the letter dated April 26, 2016. The Department updates the inventory with every
triennial sampling in a format requested by the Pennsylvania Department of Environmental
Protection (PaDEP) for compliance monitoring under the lead and copper rule. These most
recent materials inventory submitted to PaDEP is attached to the memorandum dated
October 8, 2019. The letter, memorandum and documents referenced above are attached as
PA-I-13a (April 26, 2016 letter with attached documents) and PA-I-13b (October 1, 2019
memorandum with attached table).

By way of further response, the Department notes that, in January 2021, the EPA finalized
revisions to the National Primary Drinking Water Regulations for lead and copper under the
Safe Drinking Water Act (commonly known as the Lead and Copper Rule). This is the first
major revision of the Rule in nearly thirty years; and will require PWD to expand current
drinking water programs and cause the incurrence of additional expenses not accounted for
in the cost of service study to achieve compliance. Such additional expenses were not
estimated and included in the Cost of Service Report for the Rate Period, and are beyond
the scope of this proceeding. Detailed costs and implementation tasks related to compliance
with the LCR revisions are not available at this time.

The Department notes that citations to the C.F.R. in this interrogatory and request are no
longer valid as of the publication of the revised LCR in the Federal Register on January
15, 2021.

RESPONSE PROVIDED BY: Gary Burlingame
PA-I-14. DESCRIBE HOW AND WHEN PWD PLANS TO SUPPLEMENT OR UPDATE ITS MOST RECENTLY COMPLETED MATERIALS EVALUATION. PLEASE PROVIDE ALL DOCUMENTS RELIED ON IN PREPARING ANY SUPPLEMENTAL OR UPDATED MATERIALS EVALUATIONS.

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon on or otherwise used in preparing the material evaluation are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between material evaluation and the prospective rates and charges proposed for the Rate Period.
PHILADELPHIA WATER DEPARTMENT
Response to PA Interrogatory

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

See the response to PA-I-13.

**RESPONSE PROVIDED BY:** Gary Burlingame
PA-I-15. PLEASE PROVIDE ALL MAPS AND DATA, INCLUDING GLOBAL INFORMATION SYSTEM (GIS) DATA, RELATED TO THE LOCATIONS OF SERVICE LINES IN PWD’S SYSTEM COMPOSED OF:

A. LEAD;
B. GALVANIZED STEEL;
C. COPPER; OR
D. UNKNOWN MATERIAL.

RESPONSE:

This interrogatory and request are based on the incorrect assumption that service lines are part of the Department’s water system. The Department’s objections and clarifications to the instructions/definitions are incorporated herein by reference.

The Department also objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of maps and GIS data would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information. PWD does not make public the individual street addresses of sites due to privacy issues and the concerns that doing so will discourage previous participants from continuing in the program in future years.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon on or otherwise used in making
its decision on service lines are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s decision, if any, and the prospective rates and charges proposed for the Rate Period.

RESPONSE PROVIDED BY: Philadelphia Water Department
IDENTIFY AND DESCRIBE ALL METHODS PWD HAS USED SINCE JUNE 30, 2018 TO DETERMINE THE COMPOSITION OF SERVICE LINES IN ITS SYSTEM, INCLUDING BUT NOT LIMITED TO REVIEW OF CONSTRUCTION RECORDS, CURB-BOX INSPECTIONS, AND EXCAVATIONS.

RESPONSE:

This interrogatory and request are based on the incorrect assumption that service lines are part of the Department’s water system. The Department’s objections and clarifications to the instructions/definitions are incorporated herein by reference. As explained, Lead lines on either side of the curb stop are not considered as part of PWD’s system.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The Department has used as available data plumbing permit records, construction records, operational records, sampling records and HELP loan records to determine the composition of lines on either side of the curb stop.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-17. **PLEASE IDENTIFY HOW MANY SERVICE LINES PWD HAS EXAMINED USING EACH OF THE METHODS IDENTIFIED IN RESPONSE TO THE IMMEDIATELY PRECEDING DATA REQUEST?**

**RESPONSE:**

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The number of service lines previously examined by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the number of service lines previously examined by the Department and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

- Permit Records – 23,049; Construction Records – 26,768; Operation Records – 212,701;
- Sampling Records – 1,484; HELP loans – 795

**RESPONSE PROVIDED BY:** Philadelphia Water Department
PA-I-18. PLEASE DESCRIBE ANY “CONSTRUCTION RECORDS” PWD IS RELYING
ON TO IDENTIFY SERVICE LINE COMPOSITION, INCLUDING BUT NOT
LIMITED TO THE NUMBER OF CONSTRUCTION RECORDS PWD HAS
AND THE SOURCE OF THESE RECORDS. SEPARATELY PROVIDE ALL
DOCUMENTS RELATED TO THE ACCURACY OR RELIABILITY OF
THESE CONSTRUCTION RECORDS.

RESPONSE:
The Department objects to this interrogatory and request on the grounds that the discovery
sought will cause unreasonable annoyance, burden and expense to the Department.
Compilation of information and documents being requested would require a costly and
burdensome special investigation to produce. This interrogatory and request are
potentially seeking a large amount of information and documents, since they would
require the compilation of records on approximately 480,000 service connections. This
interrogatory and request are particularly burdensome given the shortened period allotted
to compile discovery responses in this proceeding. The Department objects to this
interrogatory and request to the extent that it seeks confidential, privileged, proprietary or
other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the
Department. The information and documents related to the accuracy or reliability of
construction records are not pertinent to the prospective rates and charges for the Rate
Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The
Rate Board is empowered to approve, modify or reject proposed rates and charges. See,
Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority
over the Department. This interrogatory and request are not seeking information related to
the prospective rates and charges proposed for the Rate Period. The requested information
will not assist the Rate Board in determining the prospective rates and charges for the Rate
Period. No nexus has been established between construction records and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Pipe material is recorded when replacing water mains in the streets. Typical procedure in water main replacement projects calls for the replacement of the street side of the water pipes up to and including the curb stop. Construction inspectors will record the material on the house side when installing the new curb stop. PWD currently has material records from approximately 250 water main replacement projects.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-19. DESCRIBE ANY PROCEDURES OR PROTOCOLS PWD FOLLOWS IF ITS REVIEW OF CONSTRUCTION RECORDS INDICATES THAT A SERVICE LINE IS MADE OF:

A. LEAD;
B. GALVANIZED STEEL;
C. COPPER; OR
D. UNKNOWN MATERIAL.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The procedures and protocols utilized in reviewing construction records is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the requested information and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

PWD construction provides all homes with flushing construction after water main replacement. If the water line contains lead or galvanized steel, the Department will provide a second set of instructions which detail a more intensive flushing schedule. The
Department also makes multiple attempts with homeowners to replace lead and galvanized lines once found during construction.

The flushing instruction documents are included in attachment PA-I-19.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-20. PLEASE IDENTIFY HOW MANY CURB-BOX INSPECTIONS PWD HAS COMPLETED SINCE JUNE 30, 2018 (BY MONTH)?

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The number of curb box inspections previously completed by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the number of curb box inspections previously completed by the Department and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

PWD does not use curb-box inspections to determine the composition of water service pipes.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-21. PLEASE PROVIDE ALL DOCUMENTS REGARDING THE ACCURACY OR RELIABILITY OF CURB-BOX INSPECTIONS IN IDENTIFYING THE COMPOSITION OF SERVICE LINES.

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents related to the accuracy or reliability of inspections are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between inspections and the prospective rates and charges proposed for the Rate Period.
Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of maps and GIS data would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information. PWD does not make public the individual street addresses of sites due to privacy issues and the concerns that doing so will discourage previous participants from continuing in the program in future years.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon on or otherwise used in making its decision on service lines are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate
Period. No nexus has been established between the Department’s decision, if any, and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-23. PLEASE PROVIDE A DETAILED DESCRIPTION, ALONG WITH ALL
WRITTEN DOCUMENTATION, OF HOW PWD SELECTS THE ADDRESSES
WHERE IT CONDUCTS CURB-BOX INSPECTIONS?

RESPONSE:

The Department objects to this interrogatory and request in that they seek information
and documents that are privileged. This interrogatory and request are seeking to learn
about the Department’s decision-making process, which is protected from disclosure by
the deliberative process privilege. The Department further objects to this interrogatory and
request to the extent that it seeks information and documents protected by attorney-client
privilege.

The Department objects to this interrogatory and request on the grounds that the discovery
sought will cause unreasonable annoyance, burden and expense to the Department.
Compilation of information and documents being requested would require a costly and
burdensome special investigation to produce. This interrogatory and request are
particularly burdensome given the shortened period allotted to compile discovery
responses in this proceeding. The Department objects to this interrogatory and request to
the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the
Department. The information and documents relied upon or otherwise used in making
its decision are not pertinent to the prospective rates and charges for the Rate Period
(Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate
Board is empowered to approve, modify or reject proposed rates and charges. See, Section
13-101, Philadelphia Code. The Rate Board does not have oversight authority over the
Department. This interrogatory and request are not seeking information related to the
prospective rates and charges proposed for the Rate Period. The requested information
will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s decision, if any, and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-24. PLEASE PROVIDE A DETAILED DESCRIPTION OF HOW PWD DECIDES THE ORDER OR PRIORITY OF ADDRESSES WHERE IT CONDUCTS CURB-BOX INSPECTIONS? PLEASE PROVIDE ALL DOCUMENTS RELATING TO HOW PWD ORDERS OR PRIORITIZES ADDRESSES FOR INSPECTION.

RESPONSE:

The Department objects to this interrogatory and request in that they seeks information and documents that are privileged. This interrogatory and request are seeking to learn about the Department’s decision-making process, which is protected from disclosure by the deliberative process privilege. The Department further objects to this interrogatory and request to the extent that it seeks information and documents protected by attorney-client privilege.

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon or otherwise used in making its decisions on curb box inspections are not pertinent to the prospective rates and charges.
for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s decision, if any, and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-25. FOR CURB-BOX INSPECTIONS COMPLETED SINCE JUNE 30, 2018:

A. IDENTIFY HOW MANY WERE COMPLETED USING PWD-EMPLOYEE WORK CREWS;
B. PROVIDE THE AVERAGE COST PER INSPECTION FOR INSPECTIONS CONDUCTED BY PWDEMPLOYED WORK CREWS;
C. PLEASE DESCRIBE HOW THE AVERAGE COST IN (B) WAS CALCULATED AND PROVIDE ANY DOCUMENTS USED IN PREPARING THE CALCULATION;
D. IDENTIFY HOW MANY INSPECTIONS WERE COMPLETED BY CONTRACTORS;
E. PLEASE IDENTIFY EACH CONTRACTOR USED BY PWD FOR INSPECTIONS;
F. FOR EACH CONTRACTOR IN (D) PROVIDE THE NUMBER OF INSPECTIONS AND THE AVERAGE COST PER INSPECTION;
G. PLEASE DESCRIBE HOW THE AVERAGE COSTS IN (F) WERE CALCULATED AND PROVIDE ANY DOCUMENTS USED IN PREPARING THE CALCULATIONS.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The number of curb box inspections previously completed by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period.
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Period. No nexus has been established between the number of curb box inspections previously completed by the Department and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-26. FOR CURB-BOX INSPECTIONS COMPLETED SINCE JUNE 30, 2018,

PLEASE PROVIDE:

A. THE NUMBER OF LEAD SERVICE LINES IDENTIFIED;
B. THE NUMBER OF GALVANIZED STEEL SERVICE LINES IDENTIFIED;
C. THE NUMBER OF COPPER SERVICE LINES IDENTIFIED;
D. THE NUMBER OF SERVICE LINES COMPOSED OF ANY OTHER
   MATERIAL IDENTIFIED;
E. THE NUMBER OF SERVICE LINES FOR WHICH INSPECTIONS WERE
   INCONCLUSIVE.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges
proposed by the Department. The number of curb box inspections previously completed
by the Department is not pertinent to the prospective rates and charges for the Rate Period
(Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate
Board is empowered to approve, modify or reject proposed rates and charges. See, Section
13-101, Philadelphia Code. The Rate Board does not have oversight authority over the
Department. This interrogatory and request are not seeking information related to the
prospective rates and charges proposed for the Rate Period. The requested information
will not assist the Rate Board in determining the prospective rates and charges for the Rate
Period. No nexus has been established between the number of curb box inspections
previously completed by the Department and the prospective rates and charges proposed
for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and
without waiver thereof, the Department responds to this interrogatory and request as
follows:
Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-27. DESCRIBE THE PROCEDURES OR PROTOCOLS FOLLOWED BY PWD IF
THE CURB-BOX INSPECTION:

A. IDENTIFIES A LEAD SERVICE LINE;
B. IDENTIFIES A GALVANIZED STEEL SERVICE LINE;
C. IDENTIFIES A COPPER SERVICE LINE; OR
D. IS INCONCLUSIVE.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges
proposed by the Department. The number of curb box inspections previously completed
by the Department is not pertinent to the prospective rates and charges for the Rate Period
(Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate
Board is empowered to approve, modify or reject proposed rates and charges. See, Section
13-101, Philadelphia Code. The Rate Board does not have oversight authority over the
Department. This interrogatory and request are not seeking information related to the
prospective rates and charges proposed for the Rate Period. The requested information
will not assist the Rate Board in determining the prospective rates and charges for the Rate
Period. No nexus has been established between the number of curb box inspections
previously completed by the Department and the prospective rates and charges proposed
for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and
without waiver thereof, the Department responds to this interrogatory and request as
follows:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-28. HOW MANY CURB-BOX INSPECTIONS DOES PWD PLAN TO CONDUCT AFTER JULY 1, 2020 (BY MONTH)?

RESPONSE:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-29. FOR CURB-BOX INSPECTIONS PWD EXPECTS TO COMPLETE AFTER JANUARY 1, 2020:

A. IDENTIFY HOW MANY PWD EXPECTS TO COMPLETE USING PWD-EMPLOYEE WORK CREWS.

B. PROVIDE THE EXPECTED AVERAGE COST PER INSPECTION FOR INSPECTIONS CONDUCTED BY PWD-EMPLOYEE WORK CREWS. PLEASE DESCRIBE HOW THE AVERAGE COST WAS CALCULATED AND PROVIDE ANY DOCUMENTS USED IN PREPARING THE CALCULATION.

C. IDENTIFY HOW MANY INSPECTIONS PWD EXPECTS TO COMPLETE USING CONTRACTORS.

D. IDENTIFY EACH CONTRACTOR PWD INTENDS TO USE.

E. FOR EACH CONTRACTOR IN (D), PROVIDE THE NUMBER OF LEAD SERVICE LINES PWD EXPECTS THE CONTRACTOR TO INSPECT, AND THE EXPECTED AVERAGE COST PER INSPECTION. PLEASE DESCRIBE HOW THE AVERAGE COST WAS CALCULATED AND PROVIDE ANY DOCUMENTS USED IN PREPARING THE CALCULATION.

F. PROVIDE ANY REQUESTS FOR PROPOSAL OR CONTRACTS RELATING TO ALL INSPECTIONS TO BE CONDUCTED AFTER JANUARY 1, 2020.

RESPONSE:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-30. DOES PWD NOTIFY A CUSTOMER BEFORE IT CONDUCTS A CURB-BOX INSPECTION? IF SO, PLEASE DESCRIBE HOW.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. Methods of prior notification is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the prior notification and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-31. PLEASE PROVIDE ALL NOTIFICATION MATERIALS PWD DISTRIBUTES TO CUSTOMERS PRIOR TO A CURB-BOX INSPECTION.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents provided to customers are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the information provided to customers and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the responses to PA-I-20 and PA-I-30.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-32. DOES PWD NOTIFY A CUSTOMER OF THE RESULTS OF A CURB-BOX INSPECTION OF A SERVICE LINE? IF SO, PLEASE DESCRIBE HOW.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents provided to customers are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the information provided to customers and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the responses to PA-I-20, PA-I-30 and PA-I-31.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-33. PLEASE PROVIDE ALL NOTIFICATION MATERIALS PWD Distributes to Customers After Completion of a Curb-Box Inspection.

RESPONSE:

The Department objects to this interrogatory and request are duplicative and cumulative of PA-I-31.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents provided to customers are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the information provided to customers and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the responses to PA-I-20, PA-I-30 and PA-I-31.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-34. IDENTIFY HOW MANY EXCAVATIONS PWD HAS CONDUCTED TO DETERMINE THE COMPOSITION OF A SERVICE LINE SINCE JUNE 30, 2018.

RESPONSE:
Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The excavations conducted by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between excavations conducted by the Department and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The Department does not conduct exploratory excavations to determine composition of lines on either side of the curb stop.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-35. DOES PWD HAVE MAPS OR DATA ON THE LOCATIONS OF
EXCAVATIONS CONDUCTED TO DETERMINE THE COMPOSITION OF A
SERVICE LINE COMPLETED SINCE JUNE 30, 2018? PLEASE PROVIDE
ALL MAPS AND DATA, INCLUDING GIS DATA, RELATED TO THE
LOCATIONS OF SUCH INSPECTIONS.

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery
sought will cause unreasonable annoyance, burden and expense to the Department.
Compilation of maps and GIS data would require a costly and burdensome special
investigation to produce. This interrogatory and request are potentially seeking a large
amount of information and documents, since they would require the compilation of
records on approximately 480,000 service connections. This interrogatory and request are
particularly burdensome given the shortened period allotted to compile discovery
responses in this proceeding. The Department objects to this interrogatory and request to
the extent that it seeks confidential, privileged, proprietary or other privileged information.
PWD does not make public the individual street addresses of sites due to privacy issues
and the concerns that doing so will discourage previous participants from continuing in the
program in future years.

The proper scope of this proceeding is limited to the rates and charges proposed by the
Department. The information and documents relied upon on or otherwise used in making
its decision on service lines are not pertinent to the prospective rates and charges for the
Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction.
The Rate Board is empowered to approve, modify or reject proposed rates and charges.
See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority
over the Department. This interrogatory and request are not seeking information related to
the prospective rates and charges proposed for the Rate Period. The requested information
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will not assist the Rate Board in determining the prospective rates and charges for the Rate
Period. No nexus has been established between the Department’s decision, if any, and the
prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and
without waiver thereof, the Department responds to this interrogatory and request as
follows:

See the response to PA-I-34.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-36. FOR THE EXCAVATIONS TO DETERMINE THE COMPOSITION OF A
SERVICE LINE COMPLETED SINCE JUNE 30, 2018, PLEASE IDENTIFY:
A. THE NUMBER OF LEAD SERVICE LINES IDENTIFIED;
B. THE NUMBER OF GALVANIZED STEEL SERVICE LINES IDENTIFIED;
C. THE NUMBER OF COPPER SERVICE LINES IDENTIFIED;
D. THE NUMBER OF SERVICE LINES COMPOSED OF ANY OTHER
   MATERIAL IDENTIFIED;
E. THE NUMBER OF SERVICE LINES FOR WHICH EXCAVATIONS WERE
   INCONCLUSIVE.

RESPONSE:
Objection. The proper scope of this proceeding is limited to the rates and charges
proposed by the Department. The excavations conducted by the Department is not
pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and
Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to
approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia
Code. The Rate Board does not have oversight authority over the Department. This
interrogatory and request are not seeking information related to the prospective rates and
charges proposed for the Rate Period. The requested information will not assist the Rate
Board in determining the prospective rates and charges for the Rate Period. No nexus has
been established between excavations conducted by the Department and the prospective
rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and
without waiver thereof, the Department responds to this interrogatory and request as
follows:

See the response to PA-I-34.
RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-37. DESCRIBE THE PROCEDURES FOLLOWED BY PWD IF AN EXCAVATION TO DETERMINE THE COMPOSITION OF A SERVICE LINE:

A. IDENTIFIES A LEAD SERVICE LINE;
B. IDENTIFIES A GALVANIZED STEEL SERVICE LINE;
C. IDENTIFIES A COPPER SERVICE LINE; OR
D. IS INCONCLUSIVE.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The procedures for excavations conducted by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the procedures for excavations conducted by the Department and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

See the response to PA-I-34.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-38. OF THE EXCAVATIONS TO DETERMINE THE COMPOSITION OF A
SERVICE LINE COMPLETED SINCE JUNE 30, 2018:

A. IDENTIFY HOW MANY WERE COMPLETED USING PWD-EMPLOYEE
WORK CREWS.

B. PROVIDE THE AVERAGE COST PER EXCAVATION USING PWD-
EMPLOYEE WORK CREWS.

C. IDENTIFY HOW MANY WERE COMPLETED BY CONTRACTORS.

D. IDENTIFY EACH CONTRACTOR PWD USED.

E. FOR EACH CONTRACTOR IN (D), PROVIDE THE NUMBER OF
EXCAVATIONS AND THE AVERAGE COST PER EXCAVATION.

F. PROVIDE ANY REQUESTS FOR PROPOSAL OR CONTRACTS RELATING
TO ALL EXCAVATIONS COMPLETED SINCE JUNE 30, 2018.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges
proposed by the Department. The number prior excavations is not pertinent to the
prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023).
The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or
reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate
Board does not have oversight authority over the Department. This interrogatory and
request are not seeking information related to the prospective rates and charges proposed
for the Rate Period. The requested information will not assist the Rate Board in
determining the prospective rates and charges for the Rate Period. No nexus has been
established between the number of prior excavations and the prospective rates and charges
proposed for the Rate Period.
Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

See the response to PA-I-34.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-39. IDENTIFY THE NUMBER OF PUBLIC-SIDE LEAD SERVICE LINE
REPLACEMENTS PWD COMPLETED SINCE JUNE 30, 2018 (BY MONTH).

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the
instructions/definitions, which are incorporated herein by reference, the Department’s
response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and
without waiver thereof, the Department responds to this interrogatory and request as
follows:

The Department has completed or arranged to complete the replacement of 2,138 lead or
galvanized pipes from the main to the curb stop since the inception of its two lead line
replacement programs.

RESPONSE PROVIDED BY: Philadelphia Water Department

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The Department has completed or arranged to complete the replacement of 1,573 lead or galvanized pipes on the premises side of the curb stop since the inception of its two lead line replacement programs.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-41. WHEN PWD REPLACES BOTH THE PRIVATE-SIDE AND PUBLIC-SIDE LEAD SERVICE LINE AT AN ADDRESS, IS THAT COUNTED BY PWD AS TWO SERVICE LINE REPLACEMENTS?

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

In response to the previous question, PWD counts two lines as being replaced during full replacement of lines on both sides of the curb stop.

RESPONSE PROVIDED BY: Philadelphia Water Department

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The Department has completed or arranged to complete the replacement of 1,334 lead or galvanized pipes on both sides of the curb stop since the inception of its two lead line replacement programs.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-43. DOES PWD CONDUCT PARTIAL LEAD SERVICE LINE REPLACEMENTS?

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Yes. By way of further response, PWD has been using non-leaded connectors for partial connections. These connectors contain non-metallic materials that separate dissimilar metals, thus preventing galvanic corrosion which is considered a cause of elevated lead following partial connection. See pages 64 of PWD’s Submission of Comments Concerning National Primary Drinking Water Regulations: Proposed Lead and Copper Rule Revisions – Docket No. EPA-HQ-OW-2017-0300, attached as PA-I-5.pdf.

RESPONSE PROVIDED BY: Gary Burlingame
PA-I-44. IDENTIFY THE NUMBER OF PARTIAL LEAD SERVICE LINE REPLACEMENTS PWD COMPLETED SINCE JUNE 30, 2018 (BY MONTH).

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections and clarifications, and without waiver thereof, the Department responds to this interrogatory and request as follows:

216 properties have had a reconnection of a lead line from the inception of the Department’s lead line replacement programs.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-45. DOES PWD HAVE MAPS OR DATA ON THE LOCATIONS OF LEAD
SERVICE LINE REPLACEMENTS COMPLETED SINCE JUNE 30, 2018?
PLEASE PROVIDE ALL MAPS AND DATA, INCLUDING GIS DATA,
RELATED TO THE LOCATIONS OF SUCH REPLACEMENTS.

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery
sought will cause unreasonable annoyance, burden and expense to the Department.
Compilation of maps and GIS data would require a costly and burdensome special
investigation to produce. This interrogatory and request are potentially seeking a large
amount of information and documents, since they would require the compilation of
records on approximately 480,000 service connections. This interrogatory and request are
particularly burdensome given the shortened period allotted to compile discovery
responses in this proceeding. The Department objects to this interrogatory and request to
the extent that it seeks confidential, privileged, proprietary or other privileged information.
PWD does not make public the individual street addresses of sites due to privacy issues
and the concerns that doing so will discourage previous participants from continuing in the
program in future years.

The proper scope of this proceeding is limited to the rates and charges proposed by the
Department. The information and documents relied upon on or otherwise used in making
its decision on service lines are not pertinent to the prospective rates and charges for the
Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction.
The Rate Board is empowered to approve, modify or reject proposed rates and charges.
See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority
over the Department. This interrogatory and request are not seeking information related to
the prospective rates and charges proposed for the Rate Period. The requested information
will not assist the Rate Board in determining the prospective rates and charges for the Rate
Period. No nexus has been established between the Department’s decision, if any, and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-46. HOW DOES PWD SELECT THE ADDRESSES WHERE IT CONDUCTS
SERVICE LINE REPLACEMENTS? PLEASE PROVIDE ALL DOCUMENTS
RELATING TO HOW PWD SELECTS LOCATIONS FOR THESE
REPLACEMENTS.

RESPONSE:

The Department objects to this interrogatory and request in that they seeks information
and documents that are privileged. This interrogatory and request are seeking to learn
about the Department’s decision-making process, which is protected from disclosure by
the deliberative process privilege. The Department further objects to this interrogatory and
request to the extent that it seeks information and documents protected by attorney-client
privilege.

The Department objects to this interrogatory and request on the grounds that the discovery
sought will cause unreasonable annoyance, burden and expense to the Department.
Compilation of information and documents being requested would require a costly and
burdensome special investigation to produce. This interrogatory and request are
particularly burdensome given the shortened period allotted to compile discovery
responses in this proceeding. The Department objects to this interrogatory and request to
the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the
Department. The information and documents relied upon on or otherwise used in making
its decision are not pertinent to the prospective rates and charges for the Rate Period
(Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate
Board is empowered to approve, modify or reject proposed rates and charges. See, Section
13-101, Philadelphia Code. The Rate Board does not have oversight authority over the
Department. This interrogatory and request are not seeking information related to the
prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s decision, if any, and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-47. HOW DOES PWD DECIDE THE ORDER OR PRIORITY OF LEAD SERVICE LINE REPLACEMENTS? PLEASE PROVIDE ALL DOCUMENTS RELATING TO HOW PWD ORDERED OR PRIORITIZED LOCATIONS FOR THESE REPLACEMENTS.

RESPONSE:

The Department objects to this interrogatory and request in that they seeks information and documents that are privileged. This interrogatory and request are seeking to learn about the Department’s decision-making process, which is protected from disclosure by the deliberative process privilege. The Department further objects to this interrogatory and request to the extent that it seeks information and documents protected by attorney-client privilege.

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon on or otherwise used in making its decision on service lines are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction.
The Rate Board is empowered to approve, modify or reject proposed rates and charges.

See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s decision, if any, and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-48. FOR LEAD SERVICE LINE REPLACEMENTS SINCE JUNE 30, 2018:

A. IDENTIFY THE NUMBER OF LEAD SERVICE LINES REPLACED BY PWD-EMPLOYEE WORK CREWS.

B. PROVIDE THE AVERAGE COST PER REPLACEMENT FOR LEAD SERVICE LINES REPLACED BY PWDEMPLOYEE WORK CREWS.

C. PLEASE DESCRIBE HOW THE AVERAGE COST IN (B) WAS CALCULATED AND PROVIDE ANY DOCUMENTS USED IN PREPARING THE CALCULATION.

D. IDENTIFY THE NUMBER OF LEAD SERVICE LINES REPLACED BY CONTRACTORS.

E. IDENTIFY EACH CONTRACTOR USED BY PWD TO REPLACE LEAD SERVICE LINES.

F. FOR EACH CONTRACTOR IN (D), PROVIDE THE NUMBER OF LEAD SERVICE LINES REPLACED AND THE AVERAGE COST PER REPLACEMENT.

G. PLEASE DESCRIBE HOW THE AVERAGE COSTS IN (F) WERE CALCULATED AND PROVIDE ANY DOCUMENTS USED IN PREPARING THE CALCULATIONS.

H. PROVIDE ANY REQUESTS FOR PROPOSAL OR CONTRACTS RELATING TO REPLACEMENTS COMPLETED SINCE JUNE 30, 2018.

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This
interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The completed replacements are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between completed replacements and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-49. PLEASE DESCRIBE ALL FINANCIAL ASSISTANCE PROVIDED TO CUSTOMERS FOR PRIVATE-SIDE LEAD SERVICE LINE REPLACEMENTS CONDUCTED SINCE JUNE 30, 2018.

RESPONSE:

This interrogatory and request are based on the incorrect assumption that service lines are part of the Department’s water system. The Department’s objections and clarifications to the instructions/definitions are incorporated herein by reference. As explained in the aforesaid objections and clarifications, lead lines on either side of the curb stop are not considered as part of PWD’s system.

The Department further objects to this interrogatory in that it seeks information that is a matter of public record and otherwise available to the Public Advocate. This interrogatory and request seek information and documents that are available to the Public Advocate through the Public Advocate’s own efforts. It follows that this request imposes an unreasonable burden or expense on the Department to obtain such information or documents and to provide same to the Public Advocate.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-50. FOR ALL PRIVATE-SIDE LEAD SERVICE LINE REPLACEMENTS
PERFORMED SINCE JUNE 30, 2018, PLEASE IDENTIFY:

A. HOW MANY WERE PROVIDED AT NO CHARGE TO THE HOMEOWNER
UNDER THE REPLACEMENT PROGRAM;

B. PLEASE PROVIDE A LIST OF HOW MANY WERE FUNDED THROUGH
EACH PROGRAM OR FUNDING SOURCES USED.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges
proposed by the Department. The procedures used by the Department is not pertinent to
the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year
2023). The Board has limited jurisdiction. The Rate Board is empowered to approve,
modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The
Rate Board does not have oversight authority over the Department. This interrogatory and
request are not seeking information related to the prospective rates and charges proposed
for the Rate Period. The requested information will not assist the Rate Board in
determining the prospective rates and charges for the Rate Period. No nexus has been
established between the Department’s existing procedures and the prospective rates and
charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-51. PLEASE DESCRIBE HOW PWD NOTIFIES CUSTOMERS OF THEIR ELIGIBILITY FOR PRIVATE-SIDE SERVICE LINE REPLACEMENT? PLEASE PROVIDE ALL NOTIFICATION DOCUMENTS DISTRIBUTED TO CUSTOMERS.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The procedures used by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s existing procedures and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-52. PLEASE DESCRIBE PWD’S EFFORTS TO OBTAIN A CUSTOMER’S PERMISSION OR CONSENT FOR PRIVATE-SIDE SERVICE LINE REPLACEMENT. PLEASE PROVIDE ALL PERMISSION OR CONSENT DOCUMENTS DISTRIBUTED TO CUSTOMERS.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The procedures used by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s existing procedures and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-53. PLEASE DESCRIBE ALL INFORMATION PWD PROVIDES TO CUSTOMERS AFTER A SERVICE LINE REPLACEMENT IS COMPLETE. PLEASE PROVIDE ALL DOCUMENTS GIVEN TO CUSTOMERS FOLLOWING SERVICE LINE REPLACEMENT, INCLUDING BUT NOT LIMITED TO ANY INFORMATION ON WATER FLUSHING AND TAP WATER TESTING FOR LEAD.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents provided to customers are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the information provided to customers and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-54. DOES PWD PROVIDE FILTERS TO CUSTOMERS AFTER SERVICE LINE REPLACEMENT?

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The procedures used by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s existing procedures and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-55. DOES PWD PROVIDE REPLACEMENT FILTER CARTRIDGES TO CUSTOMERS AFTER SERVICE LINE REPLACEMENT?

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The procedures used by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s existing procedures and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-56. IF, FOLLOWING LEAD SERVICE LINE REPLACEMENT, PWD PROVIDES
CUSTOMERS WITH FILTERS, REPLACEMENT CARTRIDGES, OR BOTH:

A. IDENTIFY HOW MANY FILTERS ARE PROVIDED TO EACH CUSTOMER;
B. IDENTIFY HOW MANY REPLACEMENT CARTRIDGES ARE PROVIDED
TO EACH CUSTOMER;
C. IDENTIFY HOW THE FILTER AND REPLACEMENT CARTRIDGE(S) ARE
GIVEN TO THE CUSTOMER (E.G. IN PERSON, LEFT AT THE DOOR);
D. IDENTIFY WHETHER THE FILTERS AND REPLACEMENT CARTRIDGES
ARE PROVIDED TO CUSTOMERS FREE-OF-CHARGE;
E. IDENTIFY WHETHER PWD PROVIDES ANY INSTRUCTIONS,
RECOMMENDATIONS, OR ASSISTANCE FOR FILTER INSTALLATION
AND USE AFTER SERVICE LINE REPLACEMENT AND, IF SO, PLEASE
PROVIDE ALL RELATED DOCUMENTS;
F. IDENTIFY WHETHER PWD ATTEMPTS TO VERIFY THAT THE
CUSTOMER HAS INSTALLED OR IS USING THE FILTER AS DIRECTED
BY THE MANUFACTURER, AND IF SO, HOW;
G. IDENTIFY WHETHER A CUSTOMER WHO HAS HAD A SERVICE LINE
REPLACED MAY REQUEST ADDITIONAL REPLACEMENT
CARTRIDGE(S) OR FILTER(S) FROM PWD AND, IF SO, HOW AND FOR
HOW LONG AFTER REPLACEMENT.
H. HOW MUCH DOES EACH FILTER COST?
I. HOW MUCH DOES EACH CARTRIDGE COST?

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges
proposed by the Department. The procedures used by the Department is not pertinent to
the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year
2023). The Board has limited jurisdiction. The Rate Board is empowered to approve,
modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s existing procedures and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-57. IF, FOLLOWING LEAD SERVICE LINE REPLACEMENT, PWD PROVIDES CUSTOMERS WITH FILTERS, REPLACEMENT CARTRIDGES, OR BOTH:

A. HOW MANY CUSTOMERS RECEIVED FILTERS SINCE JUNE 30, 2018, DISAGGREGATED BY MONTH?

B. HOW MANY CUSTOMERS RECEIVED REPLACEMENT CARTRIDGES SINCE JUNE 30, 2018, DISAGGREGATED BY MONTH?

C. HOW MUCH HAS PWD SPENT ON SUCH FILTERS AND CARTRIDGES SINCE JUNE 30, 2018, DISAGGREGATED BY MONTH?

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The procedures used by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s existing procedures and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The procedures used by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s existing procedures and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-59. WHAT IS THE AVERAGE COST PER REPLACEMENT OF THE
RESTORATION MEASURES DESCRIBED IN RESPONSE TO THE
IMMEDIATELY PRECEDING REQUEST?

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges
proposed by the Department. The procedures used by the Department is not pertinent to
the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year
2023). The Board has limited jurisdiction. The Rate Board is empowered to approve,
modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The
Rate Board does not have oversight authority over the Department. This interrogatory and
request are not seeking information related to the prospective rates and charges proposed
for the Rate Period. The requested information will not assist the Rate Board in
determining the prospective rates and charges for the Rate Period. No nexus has been
established between the Department’s existing procedures and the prospective rates and
charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-60. DOES PWD REPLACE GALVANIZED STEEL SERVICE LINES AS PART OF ITS SERVICE LINE REPLACEMENT PROGRAM? IF NO, PLEASE EXPLAIN WHY.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The Rate Board does not have oversight authority over the Department. Rather, it has limited jurisdiction in connection with this proceeding. The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-61. IF THE ANSWER TO THE IMMEDIATELY PRECEDING REQUEST IS NO, DID PWD CONSIDER REPLACING GALVANIZED STEEL SERVICE LINES THROUGH ITS SERVICE LINE REPLACEMENT PROGRAM? IF SO, PLEASE PROVIDE ALL DOCUMENTS PWD CONSIDERED IN DECIDING WHETHER TO INCLUDE GALVANIZED STEEL SERVICE LINES IN ITS SERVICE LINE REPLACEMENT PROGRAM.

RESPONSE:

The Department objects to this interrogatory and request in that they seeks information and documents that are privileged. This interrogatory and request are seeking to learn about the Department’s decision-making process, which is protected from disclosure by the deliberative process privilege. The Department further objects to this interrogatory and request to the extent that it seeks information and documents protected by attorney-client privilege.

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon on or otherwise used in making
its decision on galvanized steel service lines are not pertinent to the prospective rates and
charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has
limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed
rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have
oversight authority over the Department. This interrogatory and request are not seeking
information related to the prospective rates and charges proposed for the Rate Period. The
requested information will not assist the Rate Board in determining the prospective rates
and charges for the Rate Period. No nexus has been established between the Department’s
decision, if any, and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-62. PLEASE DESCRIBE PWD’S PLANS TO REPLACE LEAD SERVICE LINES AFTER JULY 1, 2020, INCLUDING THE EXPECTED NUMBER OF SERVICE LINES TO BE REPLACED AND PWD’S EXPECTED SCHEDULE FOR REPLACEMENTS.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The Rate Board does not have oversight authority over the Department. Rather, it has limited jurisdiction in connection with this proceeding. The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-63. HAS PWD SELECTED THE ADDRESSES WHERE IT WILL REPLACE SERVICE LINES AFTER JULY 1, 2020?

RESPONSE:

The Department objects to this interrogatory and request in that they seeks information and documents that are privileged. This interrogatory and request are seeking to learn about the Department’s decision-making process, which is protected from disclosure by the deliberative process privilege. The Department further objects to this interrogatory and request to the extent that it seeks information and documents protected by attorney-client privilege.

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information. PWD does not make public the individual street addresses of sites due to privacy issues and the concerns that doing so will discourage previous participants from continuing in the program in future years.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PHILADELPHIA WATER DEPARTMENT
Response to PA Interrogatory

PA-I-64. DOES PWD HAVE MAPS OR DATA ON THE LOCATIONS OF LEAD SERVICE LINE REPLACEMENTS SCHEDULED FOR REPLACEMENT AFTER JULY 1, 2018? PLEASE PROVIDE ALL MAPS AND DATA, INCLUDING GIS DATA, RELATED TO THE LOCATIONS OF SERVICE LINES SCHEDULED FOR REPLACEMENT.

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of maps and GIS data would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information. PWD does not make public the individual street addresses of sites due to privacy issues and the concerns that doing so will discourage previous participants from continuing in the program in future years.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon on or otherwise used in making its decision on service lines are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information
will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s decision, if any, and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-65. DOES PWD INTEND TO PROVIDE ANY FINANCIAL ASSISTANCE TO CUSTOMERS FOR PRIVATESIDE LEAD SERVICE LINE REPLACEMENTS TO BE CONDUCTED AFTER JULY 1, 2020? PLEASE PROVIDE A DESCRIPTION OF THIS ASSISTANCE, INCLUDING ANY FUNDS THAT PWD HAS ALLOCATED OR EXPECTS TO ALLOCATE FOR THIS ASSISTANCE.

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

See the Definitions and the responses to PA-I-1 and PA-I-2.

RESPONSE PROVIDED BY: Philadelphia Water Department
FOR HOW LONG DOES PWD INTEND TO PROVIDE FINANCIAL
ASSISTANCE FOR PRIVATE-SIDE LEAD SERVICE LINE REPLACEMENT?

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the
instructions/definitions, which are incorporated herein by reference, the Department’s
response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and
without waiver thereof, the Department responds to this interrogatory and request as
follows:

PWD intends to provide assistance as long as funding is available to support the program.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-67. FOR LEAD SERVICE LINES TO BE REPLACED AFTER JULY 1, 2020:

A. IDENTIFY THE NUMBER OF LEAD SERVICE LINES PWD EXPECTS TO
REPLACE USING PWDEMPLOYEE WORK CREWS.

B. PROVIDE THE EXPECTED AVERAGE COST PER REPLACEMENT FOR
LEAD SERVICE LINES REPLACED BY PWD-EMPLOYEE WORK CREWS.

C. PLEASE DESCRIBE HOW THE AVERAGE COST IN (B) WAS
CALCULATED AND PROVIDE ANY DOCUMENTS USED IN PREPARING
THE CALCULATION.

D. IDENTIFY THE NUMBER OF LEAD SERVICE LINES PWD EXPECTS TO
REPLACE USING CONTRACTORS.

E. IDENTIFY EACH CONTRACTOR PWD EXPECTS TO USE TO REPLACE
SERVICE LINES.

F. FOR EACH CONTRACTOR IN (D), PROVIDE THE NUMBER OF LEAD
SERVICE LINES PWD EXPECTS THE CONTRACTOR TO REPLACE AND
THE EXPECTED AVERAGE COST PER REPLACEMENT.

G. PLEASE DESCRIBE HOW THE AVERAGE COSTS IN (F) WERE
CALCULATED AND PROVIDE ANY DOCUMENTS USED IN PREPARING
THE CALCULATIONS.

H. PROVIDE ANY REQUESTS FOR PROPOSAL OR CONTRACTS RELATING
TO REPLACEMENTS EXPECTED AFTER JULY 1, 2020.

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery
sought will cause unreasonable annoyance, burden and expense to the Department.
Compilation of information and documents being requested would require a costly and
burdensome special investigation to produce. This interrogatory and request are
particularly burdensome given the shortened period allotted to compile discovery
responses in this proceeding. The Department objects to this interrogatory and request to
the extent that it seeks confidential, privileged, proprietary or other privileged information.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-68. DOES PWD INTEND TO CONTINUE REPLACING LEAD SERVICE LINES IF TAP-WATER MONITORING CONDUCTED PURSUANT TO THE LEAD AND COPPER RULE, 40 C.F.R. § 141.80 ET SEQ., SHOWS LEAD CONCENTRATIONS BELOW 15 PARTS PER BILLION AT THE 90TH PERCENTILE FOR TWO CONSECUTIVE SIXMONTH MONITORING PERIODS? PLEASE DESCRIBE THESE PLANS.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. This interrogatory and request are seeking information related to the Department’s compliance with regulatory requirements. The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

PWD intends to continue to offer to replace lead lines from the City’s water main to the customer’s meter when replacing the water main on the customer’s block, regardless of the results of tap water monitoring conducted pursuant to the lead and copper rule.

By way of further response, the Department notes that, in January 2021, the EPA finalized revisions to the National Primary Drinking Water Regulations for lead and copper under
the Safe Drinking Water Act (commonly known as the Lead and Copper Rule). This is the first major revision of the Rule in nearly thirty years; and will require PWD to expand current drinking water programs and cause the incurrence of additional expenses not accounted for in the cost of service study to achieve compliance. Such additional expenses were not estimated and included in the Cost of Service Report for the Rate Period, and are beyond the scope of this proceeding. Detailed costs and implementation tasks related to compliance with the LCR revisions are not available at this time.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-69. PLEASE INDICATE WHETHER PWD HAS BEEN DIRECTED PURSUANT
TO ANY ORDER, OR HAS ENTERED INTO ANY AGREEMENT, WITHIN
THE PAST FIVE YEARS, TO REPLACE A PRESCRIBED NUMBER OF
LEAD SERVICE LINES IN TOTAL OR PER TIME PERIOD.
A. IF SO, PROVIDE ALL SUCH ORDERS AND/OR AGREEMENTS
CONTAINING SUCH AN OBLIGATION.
B. IF SO, PLEASE PROVIDE THE NUMBER OF LEAD SERVICES LINES BY
MONTH (OR OTHER PERIOD IF OTHER THAN MONTHS) PWD IS
OBLIGATED TO REPLACE PURSUANT TO THE ORDER AND/OR
AGREEMENT.
C. IF SO, PLEASE PROVIDE THE NUMBER OF LEAD SERVICE LINES
REPLACED BY MONTH DURING THE PERIOD WHICH SUCH ORDER
AND/OR AGREEMENT HAS BEEN IN EFFECT.

RESPONSE:
No.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-70. PROVIDE AN ITEMIZED BUDGET FOR ANY ALLOCATION OF PWD’S CURRENT FISCAL YEAR CONSTRUCTION BUDGET TO A LEAD-LINE PROGRAM.

RESPONSE:

The lead line replacement budget for construction is contained within the budget item Conveyance Reconstruction. Lead line replacement is not specifically allocated within this funding.

RESPONSE PROVIDED BY: Philadelphia Water Department

RESPONSE:

Please see the response to PA-I-70.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-72. HOW MUCH OF PWD’S BUDGET FOR LEAD SERVICE LINE REPLACEMENT IN THE CURRENT FISCAL YEAR REMAINS AVAILABLE FOR REPLACEMENTS CONDUCTED AFTER MARCH 1, 2020?

RESPONSE:

Please see the response to PA-I-70.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-73. PROVIDE AN ITEMIZED BUDGET FOR PWD’S LEAD SERVICE LINE REPLACEMENT PROGRAM FOR THE IMMEDIATELY UPCOMING FISCAL YEAR.

RESPONSE:

Please see the response to PA-I-70.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-74. PROVIDE AN ITEMIZED BUDGET FOR PWD’S CURB-BOX INSPECTIONS IN THE CURRENT FISCAL YEAR.

RESPONSE:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-75. PROVIDE AN ITEMIZED BUDGET FOR PWD’S CURB-BOX INSPECTIONS IN THE IMMEDIATELY UPCOMING FISCAL YEAR.

RESPONSE:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. This interrogatory and request are seeking information related to the Department’s compliance with regulatory requirements. The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

PWD completed lead and copper compliance monitoring under the lead and copper rule in 2019 and is not required to conduct additional lead and copper compliance monitoring in 2020 or 2021 pursuant to 40 CFR 141.86.

By way of further response, the Department notes that, in January 2021, the EPA finalized revisions to the National Primary Drinking Water Regulations for lead and copper under the Safe Drinking Water Act (commonly known as the Lead and Copper Rule). This is the first major revision of the Rule in nearly thirty years; and will require PWD to expand current drinking water programs and cause the incurrence of additional expenses not accounted for in the cost of service study to achieve compliance. Such additional expenses
were not estimated and included in the Cost of Service Report for the Rate Period, and are beyond the scope of this proceeding. Detailed costs and implementation tasks related to compliance with the LCR revisions are not available at this time.

RESPONSE PROVIDED BY: Gary Burlingame

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of maps and GIS data would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information. PWD does not make public the individual street addresses of sites due to privacy issues and the concerns that doing so will discourage previous participants from continuing in the program in future years.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon on or otherwise used in making its decision on service lines are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to
the prospective rates and charges proposed for the Rate Period. The requested information
will not assist the Rate Board in determining the prospective rates and charges for the Rate
Period. No nexus has been established between the Department’s decision, if any, and the
prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and
without waiver thereof, the Department responds to this interrogatory and request as
follows:

For a breakdown of the total number of sites sampled and a discussion of the monitoring
results, please see pages 6, 39-40 and 73-74 of PWD’s Submission of Comments
Concerning National Primary Drinking Water Regulations: Proposed Lead and Copper
Rule Revisions – Docket No. EPA-HQ-OW-2017-0300, attached as PA-I-5.pdf. See also
attachment PA-I-13b.

By way of further response, the Department notes that, in January 2021, the EPA finalized
revisions to the National Primary Drinking Water Regulations for lead and copper under
the Safe Drinking Water Act (commonly known as the Lead and Copper Rule). This is the
first major revision of the Rule in nearly thirty years; and will require PWD to expand
current drinking water programs and cause the incurrence of additional expenses not
 accounted for in the cost of service study to achieve compliance. Such additional expenses
were not estimated and included in the Cost of Service Report for the Rate Period, and are
beyond the scope of this proceeding. Detailed costs and implementation tasks related to
compliance with the LCR revisions are not available at this time.

RESPONSE PROVIDED BY: Gary Burlingame
PA-I-78. PLEASE DESCRIBE PWD’S PLANS FOR LEAD AND COPPER MONITORING FOR THE JULY 1, 2020 THROUGH DECEMBER 31, 2021 PERIODS. PLEASE INCLUDE A BREAKDOWN OF THE TOTAL NUMBER OF SITES TO BE TESTED, THE LOCATION OF EACH SITE, ANY SAMPLING SCHEDULES.

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of maps and GIS data would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information. PWD does not make public the individual street addresses of sites due to privacy issues and the concerns that doing so will discourage previous participants from continuing in the program in future years.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. This interrogatory and request are seeking information related to the Department’s compliance with regulatory requirements. The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period.
(Fiscal Year 2022 and Fiscal Year 2023). The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period.

This interrogatory and request are seeking to learn about the Department’s decision-making process, which is protected from disclosure by the deliberative process privilege. The Department further objects to this interrogatory and request to the extent that it seeks information and documents protected by attorney-client privilege.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please refer to the response to PA-I-76.

By way of further response, the Department notes that the next regulatory sampling round will occur during CY 2022.

RESPONSE PROVIDED BY: Gary Burlingame
PA-I-79. DESCRIBE THE SAMPLE COLLECTION METHODS PWD USES TO CONDUCT LEAD AND COPPER MONITORING. (SEE 40 C.F.R. § 141.86(B).) PLEASE PROVIDE COPIES OF ALL WRITTEN INSTRUCTIONS PWD DISTRIBUTES TO CUSTOMERS THAT COLLECT SAMPLES FOR PWD’S LEAD AND COPPER MONITORING PROGRAM.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. This interrogatory and request are seeking information related to the Department’s compliance with regulatory requirements. The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:


By way of further response, the Department notes that, in January 2021, the EPA finalized revisions to the National Primary Drinking Water Regulations for lead and copper under the Safe Drinking Water Act (commonly known as the Lead and Copper Rule). This is the
first major revision of the Rule in nearly thirty years; and will require PWD to expand
current drinking water programs and cause the incurrence of additional expenses not
accounted for in the cost of service study to achieve compliance. Such additional expenses
were not estimated and included in the Cost of Service Report for the Rate Period, and are
beyond the scope of this proceeding. Detailed costs and implementation tasks related to
compliance with the LCR revisions are not available at this time.

The Department notes that citations to the C.F.R. in this interrogatory and request are no
longer valid as of the publication of the revised LCR in the Federal Register on January
15, 2021.

RESPONSE PROVIDED BY: Gary Burlingame
PA-I-80. DOES PWD HAVE A POOL OF TARGETED SAMPLING SITES FOR LEAD AND COPPER MONITORING? (SEE 40 C.F.R. § 141.86(A)(1).) IF YES, HOW DID IT CREATE THIS POOL?

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. This interrogatory and request are seeking information related to the Department’s compliance with regulatory requirements. The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:


The above comments explain this and how the Department needs to keep recruiting new customers for every sampling round. PWD maintains a pool in several ways, and all must be homes with lead service lines:

- We maintain past customers who have participated in the last sampling round
• When customers request samples for lead, and they are found to have a lead service line, we ask if they would be willing to be part of our pool
• Prior to every sampling round, we send out letters to homes with known or potential lead service lines, asking for participation in our sampling pool
• Our goal is to maintain more than 100 homes even though the LCR only requires us to sample from 50 homes at a time
• The participation rate is low, thus, PWD provides incentive by providing a $50 reduction on the water bill when a sample is collected and accepted for compliance

By way of further response, the Department notes that, in January 2021, the EPA finalized revisions to the National Primary Drinking Water Regulations for lead and copper under the Safe Drinking Water Act (commonly known as the Lead and Copper Rule). This is the first major revision of the Rule in nearly thirty years; and will require PWD to expand current drinking water programs and cause the incurrence of additional expenses not accounted for in the cost of service study to achieve compliance. Such additional expenses were not estimated and included in the Cost of Service Report for the Rate Period, and are beyond the scope of this proceeding. Detailed costs and implementation tasks related to compliance with the LCR revisions are not available at this time.

The Department notes that citations to the C.F.R. in this interrogatory and request are no longer valid as of the publication of the revised LCR in the Federal Register on January 15, 2021.

RESPONSE PROVIDED BY: Gary Burlingame
PA-I-81. HOW DOES PWD VERIFY THAT ITS SAMPLING POOL FOR LEAD AND COPPER MONITORING TARGETS HOMES WITH A HIGH RISK OF LEAD CONTAMINATION? (SEE 40 C.F.R. § 141.86(A)(3)-(8).)

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. This interrogatory and request are seeking information related to the Department’s compliance with regulatory requirements. The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:


PWD also inspects every home that is used in its compliance sampling to confirm that the home, as required, has a lead service line in whole or in part.

By way of further response, the Department notes that, in January 2021, the EPA finalized revisions to the National Primary Drinking Water Regulations for lead and copper under
the Safe Drinking Water Act (commonly known as the Lead and Copper Rule). This is the first major revision of the Rule in nearly thirty years; and will require PWD to expand current drinking water programs and cause the incurrence of additional expenses not accounted for in the cost of service study to achieve compliance. Such additional expenses were not estimated and included in the Cost of Service Report for the Rate Period, and are beyond the scope of this proceeding. Detailed costs and implementation tasks related to compliance with the LCR revisions are not available at this time.

The Department notes that citations to the C.F.R. in this interrogatory and request are no longer valid as of the publication of the revised LCR in the Federal Register on January 15, 2021.

RESPONSE PROVIDED BY: Gary Burlingame
PA-I-82. DOES PWD USE THE SAME SAMPLING POOL FOR EACH MONITORING PERIOD? (SEE 40 C.F.R. § 141.86(B)(4).) IF NOT, PLEASE EXPLAIN WHY NOT.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. This interrogatory and request are seeking information related to the Department’s compliance with regulatory requirements. The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:


By way of further response, the Department notes that, in January 2021, the EPA finalized revisions to the National Primary Drinking Water Regulations for lead and copper under the Safe Drinking Water Act (commonly known as the Lead and Copper Rule). This is the first major revision of the Rule in nearly thirty years; and will require PWD to expand current drinking water programs and cause the incurrence of additional expenses not
accounted for in the cost of service study to achieve compliance. Such additional expenses were not estimated and included in the Cost of Service Report for the Rate Period, and are beyond the scope of this proceeding. Detailed costs and implementation tasks related to compliance with the LCR revisions are not available at this time.

The Department notes that citations to the C.F.R. in this interrogatory and request are no longer valid as of the publication of the revised LCR in the Federal Register on January 15, 2021.

RESPONSE PROVIDED BY: Gary Burlingame
PA-I-83. HOW DOES PWD CHOOSE SAMPLING SITES WITHIN ITS SAMPLING POOL? (SEE 40 C.F.R. § 141.86(B)(4).)

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. This interrogatory and request are seeking information related to the Department’s compliance with regulatory requirements. The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:


PWD is required to use homes, single family homes preferred, that have lead service lines. We confirm that the homes used actually do have, in whole or in part, lead service lines. Without having to turn customers away from participating, we get good coverage across the City, thus representing all service areas.

By way of further response, the Department notes that, in January 2021, the EPA finalized
revisions to the National Primary Drinking Water Regulations for lead and copper under the Safe Drinking Water Act (commonly known as the Lead and Copper Rule). This is the first major revision of the Rule in nearly thirty years; and will require PWD to expand current drinking water programs and cause the incurrence of additional expenses not accounted for in the cost of service study to achieve compliance. Such additional expenses were not estimated and included in the Cost of Service Report for the Rate Period, and are beyond the scope of this proceeding. Detailed costs and implementation tasks related to compliance with the LCR revisions are not available at this time.

The Department notes that citations to the C.F.R. in this interrogatory and request are no longer valid as of the publication of the revised LCR in the Federal Register on January 15, 2021.

RESPONSE PROVIDED BY: Gary Burlingame
RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. This interrogatory and request are seeking information related to the Department’s compliance with regulatory requirements. The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:


PWD is only required to collect samples from 50 homes for every sampling round. PWD attempts to collect samples from 100 homes to best represent the City overall. In this way it has not yet been an issue when one home stops participating in the sampling program.
By way of further response, the Department notes that, in January 2021, the EPA finalized revisions to the National Primary Drinking Water Regulations for lead and copper under the Safe Drinking Water Act (commonly known as the Lead and Copper Rule). This is the first major revision of the Rule in nearly thirty years; and will require PWD to expand current drinking water programs and cause the incurrence of additional expenses not accounted for in the cost of service study to achieve compliance. Such additional expenses were not estimated and included in the Cost of Service Report for the Rate Period, and are beyond the scope of this proceeding. Detailed costs and implementation tasks related to compliance with the LCR revisions are not available at this time.

The Department notes that citations to the C.F.R. in this interrogatory and request are no longer valid as of the publication of the revised LCR in the Federal Register on January 15, 2021.

RESPONSE PROVIDED BY: Gary Burlingame
PA-I-85. PLEASE PROVIDE ITEMIZED BUDGETS FOR 2019, 2020 AND 2021 FOR
THE COLLECTION OF POST-CONSTRUCTION SAMPLES FOLLOWING
LEAD SERVICE LINE REPLACEMENT.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges
proposed by the Department. Budgeted amounts and/or funds expended in prior fiscal
years are not pertinent to the prospective rates and charges for the Rate Period (Fiscal
Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is
empowered to approve, modify or reject proposed rates and charges. See, Section 13-101,
Philadelphia Code. The Rate Board does not have oversight authority over the
Department. This interrogatory and request are not seeking information related to the
prospective rates and charges proposed for the Rate Period. The requested information
will not assist the Rate Board in determining the prospective rates and charges for the Rate
Period. No nexus has been established between the requested information and documents
and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and
without waiver thereof, the Department responds to this interrogatory and request as
follows:

The Department does not typically sample following replacement of lead lines.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-86.  ON AVERAGE, HOW LONG DOES IT TAKE FROM WHEN A CURB BOX INSPECTION IS COMPLETED FOR THE CUSTOMER TO BE NOTIFIED OF THE INSPECTION RESULTS?

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The timing of notification is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the requested information and documents and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-87. WHAT RESOURCES ARE AVAILABLE TO CUSTOMERS WITH SERVICE LINES THAT ARE COMPOSED OF LEAD ON THE PRIVATE SIDE ONLY TO HAVE THOSE LINES REPLACED AT NO COST?

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the response to PA-I-1-A. As noted in the PWD web page referenced in that response, the Department offers to replace lead pipes from the City’s water main to the customer’s meter at no cost to the customer when replacing the water main on the customer’s block.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-88. DOES PWD REPLACE LINES THAT ARE COMPOSED OF LEAD ON THE PRIVATE SIDE ONLY AT NO COST TO CUSTOMERS AS PART OF ITS 2020 AND/OR 2021 LEAD SERVICE LINE REPLACEMENT PROGRAM IF NOT, WHY?

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the responses to PA-I-1-A, PA-I-68, and PA-I-87.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-89. DID PWD CONSIDER INCLUDING SERVICE LINES THAT ARE COMPOSED OF LEAD ON THE PRIVATE-SIDE ONLY IN ITS 2020 AND/OR 2021 LEAD SERVICE LINE REPLACEMENT PROGRAM? IF SO, PLEASE PROVIDE ALL DOCUMENTS RELATING TO THIS DECISION.

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

The Department objects to this interrogatory and request in that they seeks information and documents that are privileged. This interrogatory and request are seeking to learn about the Department’s decision-making process, which is protected from disclosure by the deliberative process privilege. The Department further objects to this interrogatory and request to the extent that it seeks information and documents protected by attorney-client privilege.

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

PHILADELPHIA WATER DEPARTMENT
Response to PA Interrogatory
The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon on or otherwise used in making its decision on service lines are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s decision, if any, and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the responses to PA-I-1-A, PA-I-68, PA-I-87 and PA-I-88.

RESPONSE PROVIDED BY: Philadelphia Water Department
IF A CURB BOX INSPECTION YIELDS A RESULT OF “UNKNOWN” OR “NOT ACCESSIBLE” ON EITHER THE PRIVATE OR PUBLIC SIDE OF THE SERVICE LINE, DOES PWD EXCAVATE THE SERVICE LINE TO IDENTIFY SERVICE LINE COMPOSITION? IF NOT, WHAT DOES PWD DO? PLEASE DESCRIBE ANY FURTHER ACTION TAKEN BY PWD FOR BOTH THE PRIVATE AND PUBLIC SIDES OF THE SERVICE LINE.

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-92. PLEASE INDICATE WHETHER CURB BOX INSPECTIONS CAN BE USED, STANDING ALONE, TO POSITIVELY IDENTIFY NON-LEAD SERVICE LINES. IF NOT, PLEASE DESCRIBE ANY OTHER PROCEDURES OR PROTOCOLS PWD FOLLOWS, OTHER THAN CONDUCTING EXCAVATIONS, IF A CURB BOX INSPECTION REVEALS:

A. GALVANIZED STEEL OR IRON ON EITHER THE PUBLIC OR PRIVATE SIDE OF THE SERVICE LINE;
B. COPPER ON EITHER THE PUBLIC OR PRIVATE SIDE OF THE SERVICE LINE;
C. ANY OTHER NON-LEAD MATERIAL ON EITHER THE PUBLIC OR PRIVATE SIDE OF THE SERVICE LINE;
OR
D. UNKNOWN MATERIAL ON EITHER THE PUBLIC OR PRIVATE SIDE OF THE SERVICE LINE.

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Curb box inspections cannot determine the material of a service line accurately. PWD inspects the water pipe at the meter when inside homes.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-93. ARE EXCAVATIONS PERFORMED PRIOR TO LEAD SERVICE LINE REPLACEMENTS ONLY, OR ARE THEY ALSO PERFORMED PRIOR TO REPAIRS?

RESPONSE:

Excavations are performed when required to gain access to the water line for replacement or repair.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-94. DOES PWD PROVIDE SURFACE RESTORATION FOLLOWING AN EXCAVATION PERFORMED TO VERIFY SERVICE LINE COMPOSITION?

RESPONSE:

See the response to PA-I-34.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-95. PLEASE DESCRIBE ALL STEPS TAKEN BY PWD, IF ANY, TO
ENCOURAGE CUSTOMERS TO COMPLETE WATER SAMPLING
FOLLOWING LEAD SERVICE LINE REPLACEMENT?

RESPONSE:
See the response to PA-I-85.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-96. PLEASE PROVIDE BY MONTH, FOR JANUARY 1, 2018 TO PRESENT, THE NUMBER OF CUSTOMERS WHO HAVE REFUSED TO AUTHORIZE PWD TO REPLACE THEIR PRIVATE-SIDE LEAD SERVICE LINE FREE OF CHARGE.

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

51 properties have refused lead line replacement since the inception of the program.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-97. DOES PWD TRACK CUSTOMERS’ REASONS REFUSING TO AUTHORIZE PWD TO REPLACE THEIR PRIVATE-SIDE LEAD SERVICE LINE FREE OF CHARGE? IF SO, PLEASE PROVIDE ANY INFORMATION PWD HAS COLLECTED ABOUT THOSE REASONS.

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

No.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-98. IF A CUSTOMER DOES NOT EXPLICITLY REFUSE TO ALLOW PWD TO REPLACE THE CUSTOMER’S PRIVATE-SIDE LEAD SERVICE LINE BUT INSTEAD SIMPLY DOES NOT RESPOND TO PWD’S EFFORTS TO OBTAIN THE CUSTOMER’S CONSENT, DOES PWD PROCEED WITH A PARTIAL REPLACEMENT OF THE PUBLIC-SIDE SERVICE LINE?

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The Department will proceed with a partial replacement if the customer does not respond or refuses a full lead line replacement. The Department will connect to the existing lead line using a dielectric coupling to avoid corrosion in the line.

Please refer to the response to PA-I-43.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-99. WHAT STEPS DOES PWD TAKE TO PROVIDE A FILTER TO A CUSTOMER WHO RECEIVES A PARTIAL LEAD SERVICE LINE REPLACEMENT AFTER THE CUSTOMER EXPRESSLY REFUSES TO ALLOW PWD TO REPLACE THE CUSTOMER’S PRIVATE-SIDE LEAD SERVICE LINE?

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The procedures used by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s existing procedures and the prospective rates and charges proposed for the Rate Period.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-100. WHAT STEPS DOES PWD TAKE TO PROVIDE A FILTER TO A CUSTOMER WHO RECEIVES A PARTIAL LEAD SERVICE LINE REPLACEMENT AFTER THE CUSTOMER DOES NOT RESPOND TO PWD’S ATTEMPTS TO OBTAIN THE CUSTOMER’S CONSENT TO REPLACE THE CUSTOMER’S PRIVATE-SIDE LEAD SERVICE LINE?

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The procedures used by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s existing procedures and the prospective rates and charges proposed for the Rate Period.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-101. HOW MANY CUSTOMERS WHO INITIALLY RECEIVED PARTIAL LEAD SERVICE LINE REPLACEMENTS SUBSEQUENTLY HAD THEIR PRIVATE-SIDE LEAD SERVICE LINES REPLACED AT NO CHARGE?

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are seeking information and documents that are not readily available. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents regarding completed replacements are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has
been established between completed replacements and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department
PHILADELPHIA WATER DEPARTMENT
Response to PA Interrogatory

PA-I-102. HAS PWD ESTIMATED THE NUMBER OF CUSTOMERS WHO HAVE A SERVICE LINE COMPOSED OF LEAD ON THE PRIVATE SIDE AND A NON-LEAD MATERIAL ON THE PUBLIC SIDE? IF SO, WHAT IS PWD’S ESTIMATE?

RESPONSE:

The Department objects to this interrogatory and request are duplicative and cumulative of PA-I-5 through PA-I-12.

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are potentially seeking a large amount of information and documents, since they would require the compilation of records on approximately 480,000 service connections. This interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding. The Department objects to this interrogatory and request to the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The information and documents relied upon on or otherwise used in preparing the estimate are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The
Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between estimate and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the responses to PA-I-5 through PA-I-12.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-103. AT ANY TIME, DID A PLUMBING CODE, ORDINANCE, OR OTHER AUTHORITY REQUIRE THE USE OF LEAD PIPES FOR SERVICE LINE INSTALLATIONS IN PHILADELPHIA?

RESPONSE:

The Department objects to this interrogatory and request on the grounds that the discovery sought will cause unreasonable annoyance, burden and expense to the Department. Compilation of information and documents being requested would require a costly and burdensome special investigation to produce. This interrogatory and request are seeking information and documents over an unlimited period of time. The interrogatory and request are particularly burdensome given the shortened period allotted to compile discovery responses in this proceeding.

The Department further objects to this interrogatory in that it seeks information that is a matter of public record and otherwise available to the Public Advocate. This interrogatory and request seek information and documents that are available to the Public Advocate through the Public Advocate’s own efforts. It follows that this request imposes an unreasonable burden or expense on the Department to obtain such information or documents and to provide same to the Public Advocate.

The proper scope of this proceeding is limited to the rates and charges proposed by the Department. Prior requirements established by the City or some other authority are not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate
PHILADELPHIA WATER DEPARTMENT
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Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the requested information and documents and the prospective rates and charges proposed for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The Rules and Regulations Relative to the Construction of Plumbing or House Drainage in The City of Philadelphia, issued by the Department of Licenses and Inspections and effective in 1961 provided that water service piping and the water piping underground shall be constructed of brass, copper, lead, galvanized wrought iron, or cast iron. In Philadelphia, however, the practice of installing lead pipe from the water main to the curb was discontinued in 1946 and the practice of installing lead pipe between the curb stop and the meter was discontinued in 1960.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-104. HOW MANY PARTIAL LEAD SERVICE LINE REPLACEMENTS HAS PWD PERFORMED ON MULTIFAMILY RESIDENCES SINCE JULY 30, 2018?

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The Department does not track multifamily lead line replacements.

RESPONSE PROVIDED BY: Philadelphia Water Department
For Post-Replacement Samples Showing a Lead Concentration Above 100 Parts Per Billion, Please Describe:

A. How long it takes PWD to provide the household with bottled water after receiving the sample result; and

B. How much bottled water PWD provides.

Response:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. This interrogatory and request are seeking information related to the Department’s compliance with regulatory requirements. The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

The Department does not typically sample following replacement of a lead line and does not provide bottled water when sampling is performed upon request of a customer. If sampling by the Department show lead concentrations above 15 part per billion, the Department contacts the customer within 24 hours, makes sure they have education materials on lead and flushing, and asks if the Department may take follow-up samples to see if the lead is constant or transient. The Department may also offer to perform profile sampling to find the source of the lead if the customer allows.

Response Provided By: Gary Burlingame
PA-I-106. DOES PWD PROVIDE WATER FILTERS TO CUSTOMERS WITH LEAD LEVELS THAT EXCEED 15 PARTS PER BILLION WHO HAVE NOT HAD THEIR SERVICE LINES REPLACED? IF SO, PLEASE IDENTIFY:

A. WHEN PWD BEGAN PROVIDING FILTERS TO THESE CUSTOMERS;
B. HOW PWD SENDS ALERTS TO ELIGIBLE CUSTOMERS;
C. WHO THE FILTER VENDOR IS;
D. WHAT TYPE OF FILTER AND REPLACEMENT CARTRIDGES ARE PROVIDED, INCLUDING PRODUCT NAME AND MODEL NUMBER;
E. HOW MUCH EACH FILTER AND REPLACEMENT CARTRIDGE COSTS;
F. HOW MANY REPLACEMENT CARTRIDGES ARE PROVIDED TO EACH CUSTOMER; AND
G. HOW MANY FILTERS PWD HAS DISTRIBUTED TO DATE.

RESPONSE:

Objection. The proper scope of this proceeding is limited to the rates and charges proposed by the Department. The procedures used by the Department is not pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia Code. The Rate Board does not have oversight authority over the Department. This interrogatory and request are not seeking information related to the prospective rates and charges proposed for the Rate Period. The requested information will not assist the Rate Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between the Department’s existing procedures and the prospective rates and charges proposed for the Rate Period.

RESPONSE PROVIDED BY: Philadelphia Water Department
PARA 107. HOW MANY TIMES HAS A CURB-BOX INSPECTION REVEALED THAT A PUBLIC- OR PRIVATE-SIDE SERVICE LINE WAS MADE OF LEAD WHEN THE HISTORICAL RECORDS FOR THAT SERVICE LINE INDICATED THAT ALL OR PART OF IT WAS MADE OF A NON-LEAD MATERIAL?

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the instructions/definitions, which are incorporated herein by reference, the Department’s response to this interrogatory and request is limited to residential service lines.

Notwithstanding the above objections and the Department’s General Objections, and without waiver thereof, the Department responds to this interrogatory and request as follows:

Please see the response to PA-I-20.

RESPONSE PROVIDED BY: Philadelphia Water Department
PA-I-108. HOW MANY TIMES HAS AN EXCAVATION REVEALED THAT A PUBLIC-
OR PRIVATE-SIDE SERVICE LINE WAS MADE OF LEAD WHEN THE
HISTORICAL RECORDS FOR THAT SERVICE LINE INDICATED THAT
ALL OR PART OF THE SERVICE LINE WAS MADE OF A NON-LEAD
MATERIAL?

RESPONSE:

Please note that consistent with the Department’s objections and clarifications to the
instructions/definitions, which are incorporated herein by reference, the Department’s
response to this interrogatory and request is limited to residential service lines.

The Department objects to this interrogatory and request on the grounds that the discovery
sought will cause unreasonable annoyance, burden and expense to the Department.
Compilation of information and documents being requested would require a costly and
burdensome special investigation to produce. This interrogatory and request are seeking
information and documents that are not readily available. This interrogatory and request
are particularly burdensome given the shortened period allotted to compile discovery
responses in this proceeding. The Department objects to this interrogatory and request to
the extent that it seeks confidential, privileged, proprietary or other privileged information.

The proper scope of this proceeding is limited to the rates and charges proposed by the
Department. The information and documents regarding completed replacements are not
pertinent to the prospective rates and charges for the Rate Period (Fiscal Year 2022 and
Fiscal Year 2023). The Board has limited jurisdiction. The Rate Board is empowered to
approve, modify or reject proposed rates and charges. See, Section 13-101, Philadelphia
Code. The Rate Board does not have oversight authority over the Department. This
interrogatory and request are not seeking information related to the prospective rates and
charges proposed for the Rate Period. The requested information will not assist the Rate
Board in determining the prospective rates and charges for the Rate Period. No nexus has been established between completed replacements and the prospective rates and charges proposed for the Rate Period.

The Department’s General Objections are incorporated herein by reference.

RESPONSE PROVIDED BY: Philadelphia Water Department