

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

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

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

PA-VII-1.

- a. Is all land in the City included in the PWD's gross and impervious area calculations (e.g., streets, City parks)? If no, identify the land that is excluded; and
- b. If the response to subpart (a) is no, please provide an estimate of the excluded gross and impervious area, and explain how the costs associated stormwater service provided to the excluded area is recovered.

PA-VII-2. Reference the Excel file WCOS21\_22.xls, tab "LagRate," row 1008. Please explain why the PWD has not proposed rates for handbilled customers which are closer to the indicated cost of service.

PA-VII-3. Reference the response to PA-IV-20. Please provide an estimate of the costs associated with addressing the billing system limitations concerning customer types and verifying all customer types.

PA-VII-4. Please provide an estimate of the annual costs incurred by the PWD to manage and implement the stormwater management credit program by type, including costs for construction of facilities for FY 2017 – FY 2020. Separately identify amounts for which the PWD was directly responsible and amounts offset or funded by other sources.

PA-VII-5. Please identify the amounts included in the stormwater revenue requirement for Test Year 2022 for the stormwater management credit program by type, and indicate

where those costs are included in the stormwater cost of service study. Separately identify amounts for which the PWD will be directly responsible and amounts offset or funded by other sources.

PA-VII-6. Please provide an estimate of the annual costs associated with the Green Acres Retrofit Program by type for FY 2017 – FY 2020. Separately identify amounts for which the PWD was directly responsible and amounts offset or funded by other sources.

PA-VII-7. Please identify the amounts included in the stormwater revenue requirement for Test Year 2022 for the Green Acres Retrofit Program by type, and indicate when those costs are included in the stormwater cost of service study. Separately identify amounts for which the PWD will be directly responsible and amounts offset or funded by other sources.

PA-VII-8. Please provide an estimate of the annual costs associated with Green City Clean Waters by type for FY 2017 – FY 2020. Separately identify amounts for which the PWD was directly responsible and amounts offset or funded by other sources.

PA-VII-9. Please identify the amounts included in the stormwater revenue requirement for Test Year 2022 for Green City Clean Waters by type, and indicate where those costs are included in the stormwater cost of service study. Separately identify amounts for which the PWD will be directly responsible and amounts offset or funded by other sources.

PA-VII-10. Please update the response to PA-IV-17 to present.

PA-VII-11. Please provide a copy of the capacity factor analysis(es) described in the response to PA-I-23 and PA-IV-18.

PA-VII-12. Reference the response to PA-I-33. In PWD Statement 7A, Schedule BV-5 does not include pages 140 and 145, but rather chapter specific numbered pages. Please provide the chapter specific numbered pages referenced in the response.

PA-VII-13. Reference the response to PA-IV-14 and WCOS21\_22.xls. Please explain why the the volumes reflected in response to PA-IV-4 differ from those reflected in tab Wpltallo WCOS21\_22.xls, ALLOCFAC1-Allocation Factors-Page 1 and Page 2. Also

explain the differences in the factors reflected in Pages 1 and 2, and explain how the factors in Pages 1 and 2 are used in the cost of service study.

PA-VII-14. Please update the response to PA-IV-22 as applicable.

PA-VII-15. Reference the response to PA-IV-25:

- a. Please explain whether these water quality testing costs would increase on a maximum day or during maximum hour above those experienced during an average day or hour. If they would change, please identify the specific maximum day- and maximum hour-related testing conducted by the Company; and
- b. Please provide a detailed description of the cost included in lines 11 and 15 that are quality testing related.

PA-VII-16. Reference PA-IV-26. Please identify all water quality tests which the frequency of performance depends on whether a maximum day or maximum hour has occurred or is being incurred. Is the frequency of water quality testing generally based on quantities produced or maximum day/hour demands?

PA-VII-17. Reference the response to PA-IV-29. Please identify the number of fires, fire flows, and fire durations used in the New Orleans and Charleston cost studies.

PA-VII-18. Please explain how the groundwater charge is assessed (Schedule BV-5, ES-10).

PA-VII-19. Please identify the amount included in the water, wastewater and stormwater cost of service studies for uncollectible expenses. Identify the location of those amounts in each study.

PA-VII-20. Reference the response to PA-IV-17. Are the Fire Service quantities reflected in the attachment private fire volumes? If no, explain what these volumes represent.

PA-VII-21. Reference the response to PA-I-33. Please identify where this allocation can be found in the wastewater cost of service study schedules.

PA-VII-22. Please provide a comparison of revenues at present rates and at proposed rates for each rate class included in the cost of service studies for water, wastewater and storm

water service. Include the supporting calculations for proposed revenues in Excel format with all formulas intact.