

**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 2024 – 2025  
Rates and Charges to Become Effective  
: September 1, 2023 and September 1, 2024**

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

- PA-IX-1. Reference Schedule BV-1, Table C-7. Please update this schedule to reflect the actual values for FY 2020 through 2022.
- PA-IX-2. Reference Schedule BV-1, Table C-7. Does the Project Expenses, presented on line 17, represent the expected actual expenditures related to the Capital Improvement Program projects? If not, please explain what the Project Expenses represent.
- PA-IX-3. Reference Schedule BV-1, Table C-7, footnote (b). According to the footnote, (b) the inflation factor of 4.0 percent per year was applied to the years after FY 2024. With respect to the effects of inflation, what is the vintage year that form the basis of the FY 2023 and 2024 amounts?
- PA-IX-4. Please reconcile the \$1,411,771,000 capital budget for FY 2024, as presented in the City of Philadelphia 6-Year Capital Program, with the amount presented in Schedule BV-1, Table C-7.
- PA-IX-5. Reference Schedule BV-1, Table C-7, lines 1 through 9. Please identify the labor costs included in each line item for FY 2024 and FY 2025.
- PA-IX-6. Please explain the nature of the Roll Forward Adjustments on line 13 of Schedule BV-1, Table C-7.
- PA-IX-7. Reference PWD\_FinPlan23\_24\_Ver1.xlsm, "Assumption#s" tab.
- a. Please provide the source document supporting the 1% interest rate for Interest Income.
  - b. Please provide the source document supporting the 1% interest rate for the Debt Service Reserve Interest Income.
- PA-IX-8. Reference PWD\_FinPlan23\_24\_Ver1.xlsm, "Assumption#s" tab, Sewer Only Billed volume. Please provide the Sewer only volume before the adjustment to reflect the shift of Vicinity to Sewer only service.
- PA-IX-9. Reference PWD\_FinPlan23\_24\_Ver1.xlsm, "Assumption#s" tab, Water Wholesale.

- a. Please explain why the usage remains unchanged from year-to-year.
- b. Please explain the nature of the Management Fee rate of 10% and identify the annual amount and explain how it is reflected in the cost of service.

PA-IX-10. With reference to PWD\_FinPlan23\_24\_Ver1.xlsm, “Assumption#s” tab, Sewer Wholesale.

- a. Please provide supporting documentation for the decrease in the annual lump sum for Abington.
- b. Please provide supporting documentation for the increase in the annual lump sum for Bensalem.
- c. Please provide supporting documentation for the decrease in the annual lump sum for Cheltenham.
- d. Please provide supporting documentation for the decrease in the annual lump sum for Moreland.
- e. Please provide supporting documentation for the decrease in the annual lump sum for Lower South Hampton.
- f. Please provide supporting documentation for the decrease in the annual lump sum for Delcora.
- g. Please provide supporting documentation for the decrease in the annual lump sum for Springfield (less Wyndmoor).

PA-IX-11. Reference PWD\_FinPlan23\_24\_Ver1.xlsm, “Assumption#s” tab, O&M escalation factors. Please provide the supporting documentation for FY 2024 and 2025 escalation rates for each of the line items.

PA-IX-12. Reference PWD\_FinPlan23\_24\_Ver1.xlsm, “Assumption#s” tab, Capital Account Deposit.

- a. Please provide the supporting calculation for the 3.90% Estimated Increase in System Net Value.
- b. Please provide the supporting documentation for the FY 2023 Total System Net Plant Investment (Prior Year) of 2,338,259,070.