

**SUPPLEMENTAL RESPONSES TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 15-16**

Dated: March 2021

1 **PA-VII-15.** REFERENCE THE RESPONSE TO PA-IV-25:

2 A. PLEASE EXPLAIN WHETHER THESE WATER QUALITY TESTING COSTS
3 WOULD INCREASE ON A MAXIMUM DAY OR DURING MAXIMUM
4 HOUR ABOVE THOSE EXPERIENCED DURING AN AVERAGE DAY OR
5 HOUR. IF THEY WOULD CHANGE, PLEASE IDENTIFY THE SPECIFIC
6 MAXIMUM DAY- AND MAXIMUM HOUR-RELATED TESTING
7 CONDUCTED BY THE COMPANY; AND

8 B. PLEASE PROVIDE A DETAILED DESCRIPTION OF THE COST INCLUDED
9 IN LINES 11 AND 15 THAT ARE QUALITY TESTING RELATED.
10

11 **RESPONSE:**

12 A. Control lab tests are conducted to assess the requirements and effectiveness of the treatment
13 process. They are based on water quality not quantity so max day or max hour does not
14 dictate additional testing.

15 B. As noted in the response to PA-VIII-15, the quality testing related costs included in Lines
16 11 and 15 include an allocation of the Bureau of Lab Services (BLS). BLS provides a
17 variety of analytical services to support the Water Department's water quality requirement
18 and environmental initiatives.
19

20 **RESPONSE PROVIDED BY:** Philadelphia Water Department, and Black & Veatch
21 Management Consulting, LLC
22
23
24
25
26
27
28

1 **PA-VII-16.** REFERENCE PA-IV-26. PLEASE IDENTIFY ALL WATER QUALITY TESTS
2 WHICH THE FREQUENCY OF PERFORMANCE DEPENDS ON WHETHER
3 A MAXIMUM DAY OR MAXIMUM HOUR HAS OCCURRED OR IS BEING
4 INCURRED. IS THE FREQUENCY OF WATER QUALITY TESTING
5 GENERALLY BASED ON QUANTITIES PRODUCED OR MAXIMUM
6 DAY/HOUR DEMANDS?
7

8 **RESPONSE:**

9 Our control lab tests are conducted to assess the requirements and effectiveness of the
10 treatment process. They are based on water quality not quantity so max day or max hour
11 does not dictate additional testing.
12

13 **RESPONSE PROVIDED BY:** Philadelphia Water Department
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28