

BEFORE THE
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater and Stormwater Rates and Charges	Fiscal Years 2022-2023
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**PHILADELPHIA WATER DEPARTMENT'S
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS
SET II (Morgan)**

Pursuant to the Hearing Officer's Procedural Rules for this Rate Proceeding, the Philadelphia Water Department ("Department" or "PWD") requests that the Public Advocate provide full and complete answers to the following interrogatories and request for production of documents upon the undersigned with seven calendar days of the service hereof.

Instructions and Definitions

1. Each interrogatory and request for production shall be answered fully and completely by those officers, employees or agents of the Public Advocate who may be cognizant of the requested information and who are authorized to answer on behalf of Public Advocate. All information is to be divulged that is within the knowledge, possession and control or custody of the Public Advocate or its consultants.
2. Each answer shall restate the question and identify the name and affiliation of the person or persons who prepared the answer or who is responsible for the information contained therein.
3. Please attach written or electronic material and documents to any answer for which written or electronic material and documents are requested and/or available. If such written or electronic materials and documents are not available, state where it may be obtained. Label the material and documents with the number of the interrogatory to which it pertains. Copies of all answers shall be provided in PDF and/or Excel (.xlsx or .xls) format via email. Excel spreadsheets shall be provided with data and formulae intact.

4. Answers to these interrogatories and requests for production of documents shall be made in accordance with the Hearing Officer's Procedural Rules applicable to this rate proceeding.

5. These interrogatories and requests for documents are propounded on a continuing basis so as to require you to submit supplemental answers and/or documents should additional information become known that would have been includable in your answers and document production had they been known or available, or should information and/or documents supplied in the answers or production prove to be incorrect or incomplete. PWD reserves the right to propound additional interrogatories and to request additional documents as and if additional information is required.

6. For purposes of the following requests, "Public Advocate" or "PA" means and includes Community Legal Services, Inc. and any person, agency or corporation whom either of them has engaged for purposes of this proceeding.

Interrogatories and Requests for Production

1. Reference PA Statement 1 at pages 5, 6 and 8: Please state the factual basis for your statement that the amount of stimulus funding the Department is likely to receive will be "significant" or "extensive."
2. Reference PA Statement 1 at page 9: Provide material and documentation to support Mr. Morgan's statement that in "Rhode Island, municipal water utilities are allowed to file for multi-year rate increases based upon specific changes in their cost of service.
3. Please provide copies of the edited Black & Veatch Model and Rate Board Model with all formulas intact which support the derivation of Schedules LKM-1 through LKM-6.
4. Refer to Pages 15-17 of the Statement PA No. 1:
 - a. Please provide in electronic format, with all formulas intact, the derivation of the account growth rate assumption used in the cited revenue projection supporting this testimony. In your response, please indicate which customer types this account growth assumption was applied to.
 - b. Please provide in electronic format, with all formulas intact, the derivation of the average usage per account by customer type utilized in the cited analysis as the basis for projections.

- c. Please provide in electronic format, with all formulas intact, the derivation of the demand escalators by customer type used in the cited revenues projection supporting this testimony. In your response, please indicate which customer types this demand escalator assumption was applied to.
 - d. Please provide a comparison of the projected FY 2021 average monthly billed water volume by customer type reflected in the revenue projections presented in Schedule LKM-2 with the average monthly billed water volume by customer type during COVID-19, as reflected in the attachment provided in response to PA-ADV-4.
5. Refer to Pages 17 to 18, please provide evidence as to why you conclude that the Department's collections against billings have not been impacted by the COVID-19 pandemic.
6. Please provide the supporting data and calculations for your proposed revisions to the expense escalation factors in Schedule LKM-3.
7. Is the rate increase granted to PGW for FY 2021-22 reflected in your proposed gas escalation factor for FY 2022.

Respectfully submitted,

/s/ Andre C. Dasent

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