

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 III (Mierzwa)**

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 are 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 this proceeding.

#### Interrogatories and Requests for Production

1. Reference PA Statement 2 (page 14, Schedule JDM-1). Please provide the derivation of the cited Demand Factors in electronic format with all formulas intact.
2. Reference PA Statement 2 (pages 17-21). Please provide in electronic format, with all formulas intact, the analysis supporting the derivation of Table 1 and Table 3. Please include the development of the revised units of service, unit costs and cost of service allocations by cost category and customer type.

3. Please provide any supporting data for your derivation of the typical parcel size of existing rowhomes as being 0.02 acres, or 871 sf.
4. Please provide the specific citation for the fire flow demands referenced in your testimony.

Respectfully submitted,

/s/ Andre C. Dasent

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Date: March 25, 2021