

**RESPONSE TO**  
**PHILADELPHIA LARGE USERS GROUP'S INTERROGATORIES**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**QUESTIONS 1-3**

**Dated: March 2021**

1 **PLUG-I-1.** PROVIDE THE PROOF OF REVENUES FOR EACH RATE CLASS FOR THE  
2 WATER DEPARTMENT. INCLUDE A BREAKDOWN OF THE USAGE AND  
3 REVENUES BY USAGE BLOCK (FIRST 2 MCF, NEXT 98 MCF, NEXT 1,900  
4 MCF, AND OVER 2,000 MCF) FOR EACH RATE CLASS. PROVIDE IN  
5 EXCEL FORMAT WITH ALL FORMULAS AND LINKS INTACT.  
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7 **RESPONSE:**

8 Please refer to the response to PA-VII-22 for a projection of revenue by customer type  
9 under proposed rates reflecting the September 1 implementation of the proposed rates, the  
10 projected billings for FY 2021 and actual billings for FY 2020.  
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12 A breakdown of the revenues by usage block for each customer type is not readily  
13 available. The projected annual revenues anticipated to be collected are based on receipts  
14 which reflect payments of billings from the current and prior years. Since the projected  
15 test year revenues include payments associated with billings from prior years, the  
16 development of the breakdown of revenues by usage block for each class would require a  
17 breakdown of the payments associated with the prior year billings.  
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19 Please refer to PWD Exhibit 6: WCOS Rates-3 (pages 863-867) for the customer type and  
20 rate block breakdown of usage and billings under proposed rates prior to the lag factor.  
21 Note that for rate design purposes only, the billings are presented based on July 1  
22 implementation. As noted in PWD Statement 7A on page 41 (lines 8 to 14), the cost of  
23 service utilized for rate design is adjusted based on annualizing the 10-month period for  
24 which the proposed rates are effective.  
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26 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.  
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1 **PLUG-I-2.** PROVIDE THE PROOF OF REVENUES FOR THE WASTEWATER  
2 DEPARTMENT, BY RATE CLASS. PROVIDE IN EXCEL FORMAT WITH  
3 ALL FORMULAS AND LINKS INTACT.  
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5 **RESPONSE:**

6 Please refer to the response to PA-VII-22 for a projection of revenue by customer type  
7 under proposed rates reflecting the September 1 implementation of the proposed rates, the  
8 projected billings for FY 2021 and actual billings for FY 2020.  
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12 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.  
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1 **PLUG-I-3.** PLEASE PROVIDE THE PROOF OF REVENUES FOR THE STORMWATER  
2 WATER DEPARTMENT. PLEASE PROVIDE IN EXCEL FORMAT WITH  
3 ALL FORMULAS AND LINKS INTACT.  
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5 **RESPONSE:**

6 Please refer to the response to PA-VII-22 for a projection of revenue by customer type  
7 under proposed rates reflecting the September 1 implementation of the proposed rates, the  
8 projected billings for FY 2021 and actual billings for FY 2020.  
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10 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.  
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