

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)**

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.

Response:

Please see Attachment PA III-1.xlsx.

By: Jerome D. Mierzwa

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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.

Response:

Please see Attachment PA III-2A CONFIDENTIAL.xls and Attachment PA III-2B.xlsx. Because this response is confidential it is provided only to PWD.

By: Jerome D. Mierzwa

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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.

Response:

The website www.zillow.com/Philadelphia-pa/row-house-att/ identifies rowhomes currently for sale in Philadelphia. Selecting a specific property will identify the lot size. Web pages for specific properties can not be legibly printed.

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4. Please provide the specific citation for the fire flow demands referenced in your testimony.

Response:

Water and Wastewater Engineering, Volume 1. *Water Supply and Wastewater Removal*; Gordon Maskew Fair, John Charles Geyer, Daniel Alexander Okun; published by John Wiley & Sons; 1966, page 5-17.

By: Jerome D. Mierzwa