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 |

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
BEFORE THE
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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.

By: Jerome D. Mierzwa
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Interrogatories and Requests for Production

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

Response:


By: Jerome D. Mierzwa