

**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 Related Charges**      **Fiscal Years 2022 – 2023 Rates and Charges to Become Effective : September 1, 2021 and September 1, 2022**

Michael Skiendzielewski **DISCOVERY REQUESTS  
&  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

**A.**

**Overview:**

**Intervenor**, Michael Skiendzielewski, anticipates making the argument is his brief that the cost of PWD' s lateral help loans and the cost(s) of "HELP" loans are not evenly shared; and to the extent that they are attributed to residential rate payers is overly burdensome. To make those arguments **Intervenor** Michael Skiendzielewski exercises his right to file discovery requests and receive answers exploring the size of the Help Loan Program, the number of Lateral Replacements done, and if any repair has been paid for by an entity other than the Water Consumer, the cost to each customer class and the total cost to the system.

- MS-A 1--**      Over the last 12 years, on a year by year basis how many citations were issued for faulty laterals and/or faulty curb vents?
- MS A --2--**      In the last 12 years, on a year by year basis, how many laterals were replaced in the City of Philadelphia?
- MS A--3 --**      In the last 12 years, on a year to year basis, how many curb traps were replaced?
- MS -A - 4**      Please provide a year by year break down of the amounts loaned by PWD' s Homeowner' s Emergency Loan Program (Commonly called "HELP loans" )over the last 12 years
- MS-A-5**      In each of the last 12 years, in a yearly report, list which account(s) did the cash allocated for the loans come ?

- MS -A 6 - In each of the last 12 years, listed year by year, list the cost or lost revenue associated with the interest free loan. If a greater explanation is needed, please accept this as help. PWD borrows cash at set interest rates. Any loan given by PWD either comes from the proceeds of a loan or from one of PWD's cash accounts. If the HELP loan cash came from a loan, the amount of interest on that portion of the loan used for the help loan, year by year over a 12 year period is what is sought. If the cash for the help loan comes from a cash account under the control of the PWD, the request is to list for the last 12 years, year by year the cost of replacing the money taken from the cash account including coverage ratios. To the extent that PWD claims there is no cost to offering interest free loans, please explain how that is possible.
- MS-A-7 Over the last 12 years, year by year, list the amount charged to each class of PWD costumers for all aspects of the HELP loan, including the cost of advertising the program, administering the program, evaluating plumbers allowed to participate in the program and any and all other costs. To the extent PWD needs help in understanding the issue, this is a request to illustrate if all or only a sub section of PWD pay for the HELP loans.
- MS-A-8 Over the last 12 years has any PWD failed to collect any HELP loan?
- MS-A-9 Over the last 12 years has any PWD consumer failed to repay 100% of the HELP loan?
- MS-A-10 Over the last 12 years, listed year by year, what is the dollar amount that PWD has not collected on HELP loans?
- MS-A-11 Over the last 12 years, year by year, how was the uncollected loans charged to rate payers? To the extent PWD needs help understanding this question, it is an attempt to discover which class of PWD consumer is charged for the cost of the HELP loan and the uncollected HELP loans
- MS-A-12 Over the last 12 years, listed year by year, please provide the name of the PWD employee who was charged with deciding which rate class would bear the cost of uncollected HELP loans.
- MS-A-13 Please provide the legal opinion giving PWD the right to charge only one class of costumer, if that is what has been happening, for the uncollected and cost of the HELP loans.
- MS-A-14 Over the last 12 years has the PWD or any City department paid for the replacement of any lateral and/or curb trap?
- MS-A-15 If the answer is yes, please provide the number of replacements paid for by either PWD or other City funds for the last 12 years in a year by year chart

- MS-A-16 If the answer to MS-A-14 is no, that no City Department has ever paid to replace a broken lateral and/or curb vent, please explain how it is just to force consumers to pay for repairs to damages caused by a City Department.
- MS-A-17 If the answer to MS-A-14 is yes, for the last 12 years please provide a year by year break down of the number of lateral and/or curb vents replacements that have been paid for by a City Department.
- MS-A-18 For the last 12 years, listed year by year please provide the person at PWD who has decided which lateral and/or curb vent replacements will be paid for by a City Department and which will not be.
- MS-A-19 Over the last 12 years, in a year by year break down please provide the number of times the City's Risk Management department has paid to repair pipes damaged by PWD and/or any City Department
- MS-A-20 Please supply a copy of the notice informing PWD rate payers given a lateral and/or curb vent citation that all Philadelphians have a right to seek reimbursement for damages caused by the City of Philadelphia from the City's Risk Management Office.
- MS-A-21 Please provide a copy of the written notice given to PWD consumers given a lateral and/or curb trap citation explaining the consumers appeal right
- MS-A-21 Over the last 12 years has any HELP loan been forgiven or discounted?
- MS-A-22 If the answer to MS-A-21 is yes, provide the person who made the decision to forgive the loan
- MS-A-23 If the answer to MS-A-21 is yes, provide the written criteria used to determine when a HELP loan is forgiven.
- MS-A-24 If the answer to MS-A-21 is yes, provide the name of the author of the written criteria.