BEFORE THE
PHILADELPHIA WATER, SEWER AND STORMWATER 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

PUBLIC ADVOCATES DISCOVERY REQUESTS
& REQUESTS FOR PRODUCTION OF DOCUMENTS
SET XIV

PA-XIV-1. Reference the response to PA-VI-11, second sentence. Please provide a complete copy “of the capacity factor analysis performed for the prior rate proceeding.”

PA-XIV-2. Reference the response to PA-VII-17. Please identify the size of the populations served by the New Orleans and Charleston water utilities. Also explain how the fire flow duration and quantity were determined/calculated.

PA-XIV-3. Reference PWD Rebuttal Statement 2, page 2, lines 13-20. Please identify where Mr. Mierzwa indicated in his direct testimony that PWD’s CCOS study does not reflect the appropriate system-wide capacity factors.

PA-XIV-4. Reference PWD Rebuttal Statement 3, page 5, lines 1-4. Please explain why the extra capacity factors used by PWD are reasonable based on Table 15.2.6 of the National Fire Protection Association Fire Protection Handbook.