

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-4

Dated: April 2021

1 **PA-XIV-1.** REFERENCE THE RESPONSE TO PA-VI-11, SECOND SENTENCE. PLEASE
2 PROVIDE A COMPLETE COPY “OF THE CAPACITY FACTOR ANALYSIS
3 PERFORMED FOR THE PRIOR RATE PROCEEDING.”
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5 **RESPONSE:**

6 Please see response attachment PA-XIV-1. Note that this attachment was previously
7 provided during the 2018 Rate Proceeding in response to interrogatory response PA-VIII-
8 7.
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10 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.
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1 **PA-XIV-2.** REFERENCE THE RESPONSE TO PA-VII-17. PLEASE IDENTIFY THE SIZE
2 OF THE POPULATIONS SERVED BY THE NEW ORLEANS AND
3 CHARLESTON WATER UTILITIES. ALSO EXPLAIN HOW THE FIRE FLOW
4 DURATION AND QUANTITY WERE DETERMINED/CALCULATED.

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6 **RESPONSE:** The Sewerage and Water Board of New Orleans provides water, sewer, and
7 drainage services to the largest city in the State of Louisiana. The estimated
8 population served as of July 1, 2019 is 390,144. The Charleston Water System
9 (CWS) provides water services to over 450,000 people, which includes nearly all
10 of the developed metropolitan area inside and outside the City between the Stono
11 and Wando Rivers. CWS provides wholesale water service to 8 neighboring towns.
12 On the wastewater side, CWS provides sewer services to a retail population of
13 about 180,000 people and wholesale services to 4 neighboring utilities.

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15 The fire flow quantity and durations are determined based on industry references
16 such as the ISO and Fire Protection Handbook and discussions with the respective
17 clients regarding system capacity design standards.

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19 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.
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1 **PA-XIV-3.** REFERENCE PWD REBUTTAL STATEMENT 2, PAGE 2, LINES 13-20.
2 PLEASE IDENTIFY WHERE MR. MIERZWA INDICATED IN HIS DIRECT
3 TESTIMONY THAT PWD'S CCOS STUDY DOES NOT REFLECT THE
4 APPROPRIATE SYSTEM-WIDE CAPACITY FACTORS.

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6 **RESPONSE:**

7 Mr. Mierzwa's direct testimony does not indicate a position regarding the system-wide
8 capacity factors. He simply restates PWD's basis for the system-wide capacity factors.

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10 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.

1 **PA-XIV-4.** REFERENCE PWD REBUTTAL STATEMENT 3, PAGE 5, LINES 1-4.
2 PLEASE EXPLAIN WHY THE EXTRA CAPACITY FACTORS USED BY
3 PWD ARE REASONABLE BASED ON TABLE 15.2.6 OF THE NATIONAL
4 FIRE PROTECTION ASSOCIATION FIRE PROTECTION HANDBOOK.

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6 **RESPONSE:**

7 The extra capacity factors for fire protection service reflected in the cost of service study
8 are based on peak flows which are within the range of flows and consistent with the duration
9 required for a 10,000 gpm required fire flow as presented in Table 15.2.6 of the National
10 Fire Protection Association Fire Protection Handbook. In addition, the fire protection extra
11 capacity factors reflected in the current cost of service study are consistent with the cost of
12 service studies supporting the adopted rates approved by the Rate Board during the 2016
13 and 2018 rate proceedings. It should be noted that Mr. Mierzwa did not contest the fire
14 protection extra capacity factors during the 2016 and 2018 rate proceedings.

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16 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.
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