

**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 2024 – 2025 Rates and Charges to Become Effective September 1, 2023 and September 1, 2024**

**PUBLIC ADVOCATES DISCOVERY REQUESTS
&
REQUESTS FOR PRODUCTION OF DOCUMENTS**

SET IV

- PA-IV-1. Reference PWD Statement 7, page 14, line 21 through page 15, line 6. Please provide evidence that Vicinity is building its own facility and that the facility will be operational by February 2024.
- PA-IV-2. For each of the Company's wholesale waste water customers, please provide copies of the provisions of each contract that identify the current rates and PWD's ability to adjust those rates. Also explain how PWD ensures that each wholesale customer's rates are sufficient to recover the costs associated with service to each customer.
- PA-IV-3. Reference PWD Statement 7, page 15, lines 14-24. Please provide a copy of the Long-Term Contract Plan, and all workpapers, calculations and documentation supporting the 1.9 % identified on line 20, and the \$2.9 million identified on line 23.
- PA-IV-4. Reference Statement No. 7, Q/A 12. Please provide a complete copy of the analysis supporting the development of Step 1: The Projections of Gross Billings in Excel format with all formulas intact.
- PA-IV-5. Reference Statement No. 2A, Q/A 27. Please provide a complete copy of the analysis supporting the change in the Stormwater Management Service Credit and the Stormwater Management Fee in Lieu of Charges.

PA-IV-6. Please identify the impact of stormwater credits on total residential, and non-residential GA and IA from those used to set rates in the two prior cases.

PA-IV-7. Please identify each stormwater credit GA and IA adjustment authorized for the last three years. Identify for each adjustment, the customer's GA and IA before the adjustment and after the adjustment.

PA-IV-8. Reference Table W-10:

- a. Please provide a detailed breakdown of line items 3, 7, and 10 (Other); and
- b. Please provide a representation example of the invoices for purchased power expenses.

PA-IV-9. Reference Table WW-14. Please explain how the percentages in footnote (a) were determined. Provide supporting workpapers and calculations.

PA-IV-10. Please explain in detail any changes in the water, wastewater, and stormwater cost allocation and rate design methodologies proposed by the PWD since the last proceeding.

PA-IV-11. Please explain in detail the basis for any changes in the water customer class maximum day and maximum hour demand factors compared to the last proceeding.

PA-IV-12. For each of the past five fiscal years, please provide for the water system:

- a. System average day production;
- b. System maximum day production; and
- c. System maximum hour production.

PA-IV-13. Please provide a copy of PWD's most recent long-term water supply plan.

PA-IV-14. Please provide an estimate of the quantity of water used for public firefighting for each of the last three years.

PA-IV-15. For each customer class reflected in the water class cost of service study, please provide monthly sales for the most recent 36-month available in Excel format.

- PA-IV-16. Please explain in detail how the maximum day and maximum hour capacity factor for each class in the water class cost of service study was determined (including public and private fire). Include supporting calculations in Excel format.
- PA-IV-17. Please identify the annual quantities of non-revenue water by type for the most recent three-year period available. Also, identify annual water production for the same five annual periods.
- PA-IV-18. Since its last case, has the PWD conducted a comprehensive holistic review of its rate structure for water service under which separate rate schedules were considered for certain customer classes? If no, why not? If yes, please describe this review in detail and present all results and findings of the review.
- PA-IV-19. Please provide an estimate of the revenue reductions resulting from stormwater credits for the last five fiscal years. Include supporting calculations.
- PA-IV-20. Please provide a copy of any studies performed by PWD that evaluate the extent to which the stormwater credit program has reduced stormwater volumes.
- PA-IV-21. Reference Schedule BV-3. Please provide the workpapers and calculations supporting each newly calculated charge.
- PA-IV-22. What is the population of PWD's water service territory?
- PA-IV-23. Reference BV-1, Table W-10. Please identify by line-item number, the costs associated with water quality testing reflected in test year O&M expense.
- PA-IV-24. Please identify the frequency with which PWD performs each water quantity test and the criteria which determine how frequently each water quality test should be performed (i.e., daily weekly production quantity, etc.).
- PA-IV-25. In the wastewater cost of service study, please explain how the costs associated with I/I are allocated to each customer type.
- PA-IV-26. Reference BV-1, Table W-10:

- a. Please identify labor expense by line item;
- b. Please identify the extent to which treatment plant labor expense would increase on a maximum day to an amount higher than that experienced on an average day; and
- c. Please provide a detailed breakdown of line number 29 by customer class.

PA-IV-27. Reference the November 2022 Rate Case Settlement Progress Report provided to the Philadelphia Water, Sewer, and Storm Water Rate Board on December 13, 2022, Appendix A.

- a. Please provide a summary of the results of the survey included on pages 30-33;
- b. With respect to the two Residential Rate Structure options presented on page 24, please identify the estimated incremental costs associated with implementing each option, and the annual incremental costs associated with maintaining each option over the current billing procedures;
- c. Also, per page 24, please identify the estimated number of Apartments, Row Homes, Singles, and Twins that would fall under each of the 1A and GA tiers under option #2; and
- d. Please identify the amount of time PWD believes would be necessary to implement each of the two options presented on page 24.

PA-IV-28. Reference PWD Statement 7, Q/A27 and 28. Please explain why the PWD could not or did not propose to implement the described changes in this proceeding.

PA-IV-29. Reference PWD Statement 7, Q/A32. Please provide the analysis supporting the changes in each fee.

PA-IV-30. Reference PWD Statement 7, Q/A34. Please provide the analysis supporting the calculations of each new fee.

PA-IV-31. Please provide an estimate of the annual costs incurred by the PWD to manage and implement the stormwater management credit program by type, including costs for construction of facilities for FY 2020 – FY 2022. Separately identify amounts for which the PWD was directly responsible and amounts offset or funded by other sources.

- PA-IV-32. Please identify the amounts included in the stormwater revenue requirement for Test Year 2024 for the stormwater management credit program by type, and indicate where those costs are included in the stormwater cost of service study. Separately identify amounts for which the PWD will be directly responsible and amounts offset or funded by other sources.
- PA-IV-33. Please provide an estimate of the annual costs associated with the Green Acres Retrofit Program by type for FY 2020 – FY 2022. Separately identify amounts for which the PWD was directly responsible and amounts offset or funded by other sources.
- PA-IV-34. Please identify the amounts included in the stormwater revenue requirement for Test Year 2024 for the Green Acres Retrofit Program by type, and indicate where those costs are included in the stormwater cost of service study. Separately identify amounts for which the PWD will be directly responsible and amounts offset or funded by other sources.
- PA-IV-35. Please provide an estimate of the annual costs associated with Green City Clean Waters by type for FY 2020 – FY 2022. Separately identify amounts for which the PWD was directly responsible and amounts offset or funded by other sources.
- PA-IV-36. Please identify the amounts included in the stormwater revenue requirement for Test Year 2024 for Green City Clean Waters by type, and indicate where those costs are included in the stormwater cost of service study. Separately identify amounts for which the PWD will be directly responsible and amounts offset or funded by other sources.
- PA-IV-37. Please provide a comparison of revenues at present rates and at proposed rates for each rate class included in the cost of service studies for water, wastewater, and storm water service. Include the supporting calculations for proposed revenues in Excel format with all formulas intact.
- PA-IV-38. Please describe each of the programs currently in place designed to reduce Residential storm water volumes. Identify the number of customers participating in each program and the estimated annual reduction in storm water volumes achieved under each

program. Also identify the annual costs associated with each program and explain how the program is funded.