

**BEFORE THE  
PHILADELPHIA WATER, SEWER, AND STORM WATER RATE BOARD**

In the Matter of the Philadelphia Water	)	Fiscal Years 2024-2025
Department's Proposed Change in Water,	)	
Wastewater, and Stormwater Rates and	)	Rates and Charges to Become Effective
Related Charges	)	September 1, 2023 and September 1, 2024

**PHILADELPHIA LARGE USERS GROUP'S  
FIRST SET OF DISCOVERY TO PHILADELPHIA WATER DEPARTMENT**

**PLUG 1-1** Please provide (in EXCEL format will all formulas and links intact) total water usage(Mcf), monthly water usage (Mcf), maximum day capacity factor (%) and maximum hour capacity (%), for the calendar years 2021 and 2022, for the following rate classes:

- Residential
- Senior Citizens
- Commercial
- Industrial
- Public Utilities
- Housing Authority
- Charities and School
- Hospital/University
- Hand Billed
- Scheduled (Flat Rate)

If the information is not available, please explain why not.

**PLUG 1-2** Referring to page 15 of the Direct Testimony of Black & Veatch Management Consulting, LLC. Approximately 1.9% of the Long-Term Control Plan Update (LTCPU) costs will be recovered from wholesale wastewater customers, reducing wholesale wastewater revenues by \$2.9 million. Will PWD recover the \$2.9 million from retail wastewater customers? If yes, how will the additional cost be allocated among the customer classes? Please provide the derivation of the allocation of the \$2.9 million in EXCEL format with all formulas and links intact.