

RESPONSE TO
PHILADELPHIA LARGE USERS GROUP'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-2

Dated: March 2023

1 **PLUG-I-1.** PLEASE PROVIDE (IN EXCEL FORMAT WILL ALL FORMULAS AND
2 LINKS INTACT) TOTAL WATER USAGE(MCF), MONTHLY WATER
3 USAGE (MCF), MAXIMUM DAY CAPACITY FACTOR (%) AND
4 MAXIMUM HOUR CAPACITY (%), FOR THE CALENDAR YEARS 2021
5 AND 2022, FOR THE FOLLOWING RATE CLASSES:

6 RESIDENTIAL

7 SENIOR CITIZENS

8 COMMERCIAL

9 INDUSTRIAL

10 PUBLIC UTILITIES

11 HOUSING AUTHORITY

12 CHARITIES AND SCHOOL

13 HOSPITAL/UNIVERSITY

14 HAND BILLED

15 SCHEDULED (FLAT RATE)

16 IF THE INFORMATION IS NOT AVAILABLE, PLEASE EXPLAIN WHY
17 NOT.

18
19 **RESPONSE:**

20 The Total Water Usage (Mcf) and Monthly Water Usage (Mcf) for FY 2020, FY 2021, and
21 FY 2022 by customer type are provided in response attachment PA-IV-15.

22
23 The actual maximum day and actual maximum hour data is not available by customer class
24 to develop the Maximum Day Capacity Factor and Maximum Hour Capacity Factor for
25 fiscal years or calendar years 2021 and 2022. As noted on page 4-9 of Schedule BV-2 the
26 customer type extra capacity factors were derived based on pervious COS studies and rate
27 proceedings. For additional information, please refer to the response to PA-IV-11.
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RESPONSE PROVIDED BY: Black & Veatch Management Consulting, LLC.

1 **PLUG-I-2.** REFERRING TO PAGE 15 OF THE DIRECT TESTIMONY OF BLACK &
2 VEATCH MANAGEMENT CONSULTING, LLC. APPROXIMATELY 1.9%
3 OF THE LONG-TERM CONTROL PLAN UPDATE (LTCPU) COSTS WILL BE
4 RECOVERED FROM WHOLESALE WASTEWATER CUSTOMERS,
5 REDUCING WHOLESALE WASTEWATER REVENUES BY \$2.9 MILLION.
6 WILL PWD RECOVER THE \$2.9 MILLION FROM RETAIL WASTEWATER
7 CUSTOMERS? IF YES, HOW WILL THE ADDITIONAL COST BE
8 ALLOCATED AMONG THE CUSTOMER CLASSES? PLEASE PROVIDE
9 THE DERIVATION OF THE ALLOCATION OF THE \$2.9 MILLION IN
10 EXCEL FORMAT WITH ALL FORMULAS AND LINKS INTACT.
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12 **RESPONSE:**

13 Yes, the \$2.9M reduction in Wholesale Wastewater revenues under existing wholesale
14 fixed charges attributable to LTCPU allocations (a subset of Wholesale wastewater
15 revenues) will be recovered from Retail Wastewater customers. Consistent with prior cost
16 of service studies the Retail cost of service is the Wastewater System net revenue
17 requirement less the wholesale wastewater cost of service. Please refer to response
18 attachment PLUG-I-2 for the derivation of the estimated allocation of the \$2.9 million
19 reduction under existing wholesale fixed charges.
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21 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.
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