

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

Dated: April 2023

1 **PLUG-II-1.** REFERRING TO TABLE 4-11, PLEASE PROVIDE THE TEST YEAR 2
2 ADJUSTED COST OF SERVICE.

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4 **RESPONSE:**

5 Refer to response attachment PLUG-II-1.

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

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1 **PLUG-II-2.** PLEASE PROVIDE THE PROOF OF REVENUES FOR FY 2024 AND FY 2025
2 IN EXCEL FORMAT WITH ALL FORMULAS AND LINKS INTACT.
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4 **RESPONSE:**

5 Please refer to responses to PA-IV-37 and PA-X-1.
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7 Since PWD's revenues are collections-based and the estimated FY 2025 revenue reflects
8 collections on billings from FY 2025, FY 2024 and FY 2023, it is not appropriate to compare
9 the projected collections based revenues to the cost of service by class. As the collections
10 based revenue reflects collections of billings which are based on rates established by prior
11 cost of service distributions. Consistent with prior cost of service studies, the retail class based
12 cost of service is compared to the retail billings by customer class prior to the lag factor
13 adjustment. This comparison is provided in response attachment PLUG-II-2.
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15 As noted in the response to PA-X-1, the model file (Finplan23_24.xlsx) previously
16 provided to the Public Advocate and PLUG can be utilized to develop the requested
17 information utilizing the revenue under existing rates sections and revising the rates to
18 reflect the proposed rate schedules and the effective months to reflect a full year
19 implementation of the proposed rates.
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21 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC.
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