

**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
THIRD SET OF DISCOVERY TO PHILADELPHIA WATER DEPARTMENT**

- PLUG 3-1** Please provide any presentations, research, analysis, prepared by or on behalf of the Philadelphia Water Department related to the implementation of the Stormwater Incentive Management Program and/or the Greened Acres Retrofit Program.
- PLUG 3-2** To the extent not provided in response to PLUG 3-1, please provide any analysis or record of alternatives means of developing and installing the stormwater mitigation infrastructure currently incentivized through the Stormwater Incentive Management Program and/or the Greened Acres Retrofit Program.
- PLUG 3-3** Please reference page 27 of the Direct Testimony of Public Advocate witness Jerome Mierzwa. Please provide a copy of PWD's Schedule BV-1, Tables C-4 and C-5 updated to reflect the revised GA and IA rates proposed by Mr. Mierzwa.
- PLUG 3-4** Please provide the workpapers in Excel or other live format with all formulas intact for the revised Tables C-4 and C-5 requested in PLUG 3-3.
- PLUG 3-5** Referring to PWD's response to PA-IV-11, please provide the derivation of the maximum day and maximum hour demand factors used the class cost-of-service study. Provide in Excel format with all formulas and links intact.