

BEFORE THE  
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

Re: Philadelphia Water Department Proposed Charges in Rates and Charges	2023 General Rate Proceeding Fiscal Years 2024 - 2025
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**PHILADELPHIA WATER DEPARTMENT'S  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
TO THE PUBLIC ADVOCATE, SET II**

The Philadelphia Water Department (“Department” or “PWD”) requests that the Public Advocate provide full and complete answers to the following interrogatories and request for production of documents upon the undersigned.

Interrogatories and Requests for Production to the Public Advocate

**For Public Advocate Witnesses, Jerome D. Mierzwa:**

**General Questions**

1. Reference PA Statement 2 (Schedule JDM-1). Please provide the derivation of the cited Demand Factors in electronic format with all formulas intact.

**Response:**

2. Do you agree that the Maximum Day to Average Day Ratio of treated water production (Total Districts) experienced in FY 2019 of 1.16 is

significantly lower than the 1.30 ratio experienced in FY 2018 (PWD Statement 6 page 845, WCOS, Wpltallo-4).

Response:

3. Reference PA Statement 2 (pages 17-23). Please provide in electronic format with all formulas intact, the analysis supporting the derivation of Table 1 and Table 3. Please include the development of the revised units of service, unit costs and cost of service allocations by cost category and customer type.

Response:

4. Reference PA Statement 2 (Schedule JDM-2). Please provide in electronic format with all formulas intact, the proof of revenue analysis based on the Proposed Monthly Rates presented in Schedule JDM-2.

Response:

5. Please confirm or deny whether you proposing to adjust the existing level of non-residential customer credits for customers who are currently receiving credits for stormwater management improvements funded with

SMIP/GARP grants? If not, please explain how the proposed rates presented in Schedule JDM-2 will recover the stormwater related revenue requirements from the reduced level of stormwater units of service as presented as “(3) Average of Rate Design (1) and (2).”

Response:

Respectfully submitted,

*/s/ Andre C. Dasent*

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Andre C. Dasent, Esquire  
Commerce Square  
2001 Market Street, 25th Floor  
Philadelphia, Pennsylvania 19103  
(267) 624-3503

Ji Jun, Esquire  
Kevin Birriel, Esquire  
Philadelphia Law Department  
1515 Arch Street, 17<sup>th</sup> Floor  
Philadelphia, PA 19102

Carl R. Shultz, Esquire  
Sarah C. Stoner, Esquire  
Eckert Seamans Cherin & Mellott, LLC  
213 Market Street, 8<sup>th</sup> Floor  
Harrisburg, PA 17101

Date: April 18, 2023

Counsel to Philadelphia Water Department