

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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**PUBLIC ADVOCATE RESPONSES TO  
PHILADELPHIA WATER DEPARTMENT'S  
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
SET II**

**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:**

Please see the following attached files:

Exeter Capacity Factors PA-IV-15 PWD 2-1.xlsx and

Exeter Capacity Factors 22-23 PWD 2-1.xlsx.

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:

Mr. Mierzwa agrees that the ratio for FY 2019 of 1.16 was lower than the ratio for FY 2018 of 1.30 by 11%. As explained on page 14 of Mr. Mierzwa direct testimony, under the AWWA Method, class capacity factors should be developed based on the year with the highest ratio of system maximum day demand to system average demand over a representative number of years. The year with the highest ratio was FY 2018. To develop class extra capacity factors under the AWWA Method, customer class billing data would be utilized for FY 2018. However, as explained in the response to PA-IV-II, class consumption for FY 2018 was overstated, and it would not be appropriate to utilize this consumption data to develop class capacity factors. Therefore, Mr. Mierzwa utilized FY 2019 data which was the year with the second highest rate of system maximum day demand to system average demand over a representative number of years to develop class capacity factors.

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:

The analyses supporting the derivation of Table 1 and Table 3 is provided in the attached file Exeter WCOS23\_24\_ver1 PWD 2-3.xls.

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:

Please see the attached file Sch JDM-2 PWD 2-4.xlsx for the electronic version of Schedule JDM-2 and the attached workpaper Sch JDM-2 WP PWD 2-4.pdf. Mr. Mierzwa has not prepared a proof of revenues based on the proposed monthly rates presented in Schedule JDM-2.

5. Please confirm or deny whether you are 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:

Denied. The proposed rates presented in Schedule JDM-2 will not recover the stormwater related revenue requirement.