PHILADELPHIA WATER DEPARTMENT PA INTERROGATORY SET #VII

RESPONSE TO

PUBLIC ADVOCATE'S INTERROGATORIES

AND

REQUESTS FOR PRODUCTION OF DOCUMENTS

QUESTIONS 1-45

Dated: March 2025

PA-VII-1. GIVEN THAT PWD STAFF PERSON LAURA COPELAND IS A MEMBER OF THE BOARD OF DIRECTORS OF UESF, PLEASE PROVIDE PWD'S UNDERSTANDING OF EACH SOURCE OF FUNDING THAT UESF DISTRIBUTES AS GRANTS FOR PHILADELPHIA WATER BILLS. IDENTIFY EACH SOURCE OF FUNDING FOR THE MOST RECENTLY COMPLETED THREE FISCAL YEARS AS WELL AS THE CURRENT FISCAL YEAR TO DATE.

RESPONSE:

UESF provides financial assistance to low-income individuals and families who are facing utility service termination or who have had their utility service terminated. PECO and PWD match each dollar provided by UESF. Please also see the contract between PWD and UESF (response attachment PA-VII-8). Any more detailed information about UESF should be directed to that organization (which is not a party to this proceeding). See also, UESF website.

RESPONSE PROVIDED BY: Philadelphia Water Department

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-2.	GIVEN THAT PWD STAFFPERSON LAURA COPELAND IS A MEMBER OF
2		THE BOARD OF DIRECTORS OF UESF, PLEASE PROVIDE PWD'S
3		UNDERSTANDING OF THE DOLLARS OF ANNUAL GRANT FUNDING,
4		OR PERCENTAGE OF ANNUAL GRANT FUNDING RECEIVED BY UESF
5		FROM THE CITY OF PHILADELPHIA FOR DISTRIBUTION AS UTILITY
6		GRANTS. IDENTIFY SUCH FUNDING FOR THE MOST RECENTLY
7		COMPLETED THREE FISCAL YEARS AS WELL AS THE CURRENT
8		FISCAL YEAR TO DATE.
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0	RESPONSE	2:
1	See r	esponse to PA-VII-1.
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3	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 2

			PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-3.	GIVEN THAT PW	D STAFFPERSON LAURA COPELAND IS A MEMBER OF
2		THE BOARD OF I	DIRECTORS OF UESF, PLEASE PROVIDE PWD'S
3		UNDERSTANDIN	G OF WHAT HAPPENS TO FUNDING THAT UESF HAS
4		RECEIVED IN A H	FISCAL YEAR FOR UTILITY GRANTS, IF SAID FUNDING
5		IS NOT DISTRIBU	JTED.
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7	RESPONSE	:	
8	See re	esponse to PA-VII-1	
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10	RESPONSE	PROVIDED BY:	Philadelphia Water Department
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			Public Interrogatory Set #VII - 3

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-4.	GIVEN THAT PWD STAFFPERSON LAURA COPELAND IS A MEMBER OF
2		THE BOARD OF DIRECTORS OF UESF, PLEASE PROVIDE PWD'S
3		UNDERSTANDING OF THE AMOUNT OF FUNDS DISTRIBUTED BY UESF
4		BY YEAR FOR THE THREE MOST RECENTLY COMPLETED FISCAL
5		YEARS, AS WELL AS FOR THE CURRENT FISCAL YEAR TO DATE, TO
6		(A) THE PHILADELPHIA WATER DEPARTMENT, (B) PHILADELPHIA
7		GAS WORKS, AND (C) PECO ENERGY.
8		
9	RESPONSE	?:
10	See P	WD Statement 5 at page 10 (table depicting grant amounts received FY22-25). See
11	also,	response to PA-VII-1.
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13	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 4

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
PA-VII-5.	GIVEN THAT PWI	O STAFFPERSON LAURA COPELAND IS A MEMBER OF
	THE BOARD OF D	VIRECTORS OF UESF, PLEASE PROVIDE PWD'S
	UNDERSTANDING	G OF THE RULES GOVERNING THE DISTRIBUTION OF
	USEF GRANTS FO	R UTILITY ASSISTANCE, IDENTIFYING ANY
	DIFFERENCES BE	TWEEN RULES APPLICABLE TO (A) THE
	PHILADELPHIA W	ATER DEPARTMENT, (B) PHILADELPHIA GAS
	WORKS, AND (C)	PECO ENERGY.
RESPONSI	E:	
See 1	response to PA-VII-1. I	Please also refer to UESF website for additional information
from	the agency to which th	he discovery request should be directed. UESF is not a party to
this 1	proceeding.	
RESPONSI	E PROVIDED BY:	Philadelphia Water Department

2 THE BOARD OF DIRECTORS OF UESF, PLEASE PROVIDE PWD'S 3 UNDERSTANDING OF ANY INTERNAL OR EXTERNAL RESTRICTIONS 4 ON THE PERCENTAGE OF GRANT FUNDING RECEIVED BY UESF FOR 5 UTILITY ASSISTANCE IN A YEAR THAT MUST, IN TURN, BE 6 DISTRIBUTED AS UTILITY ASSISTANCE IN THAT SAME YEAR. 7 RESPONSE: 9 See response to PA-VII-1. Please also refer to UESF website for additional information 10 from the agency to which the discovery request should be directed. UESF is not a party to 11 this proceeding. 12 RESPONSE PROVIDED BY: 13 RESPONSE PROVIDED BY: 14 Philadelphia Water Department 15 Image: Prove the provide the			
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Public Interrogatory Set #VII - 6			
			Public Interrogatory Set #VII - 6

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-7.	GIVEN THAT PWD STAFFPERSON LAURA COPELAND IS A MEMBER OF
2		THE BOARD OF DIRECTORS OF UESF, PLEASE PROVIDE PWD'S
3		UNDERSTANDING OF ANY AGREEMENT BETWEEN UESF AND THE
4		CITY OF PHILADELPHIA REGARDING:
5		A. THE DOLLAR AMOUNT OF CITY FUNDING TO BE RECEIVED BY
6		UESF ON AN ANNUAL BASIS; AND
7		B. THE DOLLAR AMOUNT OF CITY FUNDING TO BE DISTRIBUTED BY
8		UESF ON AN ANNUAL BASIS.
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10	RESPONSE	
11	See r	esponse to PA-VII-1. Please also refer to UESF website for additional information
12	from	the agency to which the discovery request should be directed. UESF is not a party to
13	this p	roceeding.
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		Public Interrogatory Set #VII - 7

			PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-8.	GIVEN THAT PWI	D STAFFPERSON LAURA COPELAND IS A MEMBER OF
2		THE BOARD OF D	IRECTORS OF UESF, PLEASE PROVIDE PWD'S
3		UNDERSTANDING	G OF, AND A COPY OF, ANY WRITTEN AGREEMENT
4		BETWEEN THE CI	TY OF PHILADELPHIA AND UESF REGARDING THE
5		RECEIPT BY UESH	F AND DISTRIBUTION BY UESF OF CITY FUNDS FOR
6		UTILITY ASSISTA	NCE.
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8	RESPONSE	:	
9	Pleas	e see response attachm	ent PA-VII-8.
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11	RESPONSE	PROVIDED BY:	Philadelphia Water Department
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			PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-9.	GIVEN THAT PW	D STAFFPERSON LAURA COPELAND IS A MEMBER OF
2		THE BOARD OF I	DIRECTORS OF UESF, PLEASE PROVIDE PWD'S
3		UNDERSTANDIN	G OF WHETHER THE DISTRIBUTION OF UESF
4		DOLLARS BETW	EEN PWD, PGW AND PECO IS SOLELY WITHIN THE
5		DISCRETION OF	UESF.
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7	RESPONSE	2:	
8	Pleas	e see response attachr	nent PA-VII-8.
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10	RESPONSE	PROVIDED BY:	Philadelphia Water Department
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			Public Interrogatory Set #VII - 9

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-10.	REFERENCE PWD ST. 5: PLEASE PROVIDE:
2		A. THE DOLLARS BUDGETED FOR "MATCHING GRANTS" FOR EACH
3		FISCAL YEAR FY2025 – FY2027.
4		B. OF THE DOLLARS BUDGETED FOR MATCHING GRANTS, THE
5		DOLLARS PROPOSED TO BE RECOVERED THROUGH RATES.
6		
7	RESPONSE:	
8	A. For	r the purposes of this response, we have assumed that "Matching Grants" refers to
9	UE	ESF related grants funded by the Water Department. The FY 2025 budgeted amount
10	for	"matching grants" is approximately \$300,000 and projected to remain constant for
11	FY	2026 and FY 2027. Please see Table 1-5 and Table 2-1 of Schedule BV-2.
12		SF matching grants are included as both a miscellaneous revenue as well as a Class
13) expense. Therefore, there is no impact on the net revenue requirements to be
14	reco	overed through rates.
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16	RESPONSE F	PROVIDED BY: Philadelphia Water Department and Black & Veatch
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		Public Interrogatory Set #VII - 10

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-11.	BY MONTH FOR FY2024 AND FY2025 TO DATE, PLEASE PROVIDE:
2		A. THE NUMBER OF ACCOUNTS RECEIVING ASSISTANCE THROUGH
3		UESF;
4		B. THE DOLLARS OF ASSISTANCE RECEIVED THROUGH UESF;
5		C. THE NUMBER OF ACCOUNTS RECEIVING ASSISTANCE THROUGH
6		PAHAF;
7		D. THE DOLLARS OF ASSISTANCE RECEIVED THROUGH PAHAF.
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9	RESPONSE	:
10	Please	e see response attachment PA-VII-11.
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12	RESPONSE	PROVIDED BY: Water Revenue Bureau
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		Public Interrogatory Set #VII - 11

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-12.	REFERENCE PWD ST. 5, PAGE 10: ASSUMING AN ELIMINATION, OR A
2		SUBSTANTIAL REDUCTION, IN UESF GRANTS RECEIVED IN FY2026
3		AND FY2027, PLEASE PROVIDE A DETAILED EXPLANATION OF THE
4		MEANS, IF ANY, BY WHICH PWD WILL REPLACE THOSE DOLLARS FOR
5		PURPOSES OF PROVIDING GRANTS.
6		
7	RESPONSE	:
8	The e	xpectation is that PWD will see the amounts of grants per the UESF agreement. See
9	respon	nse attachment PA-VII-8.
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11	RESPONSE	PROVIDED BY: Philadelphia Water Department
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2 SUBSTANTIAL REDUCTION, IN UESF GRANTS RECEIVED IN FY2026 3 AND FY2027, PLEASE PROVIDE A DETAILED EXPLANATION OF 4 WHETHER THE PWD GRANTS NOW PROVIDED AS "MATCHING" 5 GRANTS WILL STILL REQUIRE A MATCHING, OR WHETHER THEY 6 WILL BE PROVIDED, IF AT ALL, IRRESPECTIVE OF THE EXISTENCE OF 7 MATCHING FUNDS. 8 9 9 RESPONSE: 10 PWD does not assume an elimination of UESF grants. 11 RESPONSE PROVIDED BY: 12 RESPONSE PROVIDED BY: 13 PUD does not assume an elimination of UESF grants. 14 Fease PROVIDED BY: 15 PUD does not assume an elimination of UESF grants. 16 PUD does not assume an elimination of UESF grants. 17 RESPONSE PROVIDED BY: 18 PUD does not assume an elimination of UESF grants. 19 PUD does not assume an elimination of UESF grants. 12 PUD does not assume an elimination of UESF grants. 14 PUD does not assume an elimination of UESF grants. 19 PUD does not assume an elimination does not			
2 SUBSTANTIAL REDUCTION, IN UESF GRANTS RECEIVED IN FY2026 3 AND FY2027, PLEASE PROVIDE A DETAILED EXPLANATION OF 4 WHETHER THE PWD GRANTS NOW PROVIDED AS "MATCHING" 5 GRANTS WILL STILL REQUIRE A MATCHING, OR WHETHER THEY 6 WILL BE PROVIDED, IF AT ALL, IRRESPECTIVE OF THE EXISTENCE OR 7 MATCHING FUNDS. 8 PWD does not assume an elimination of UESF grants. 11 RESPONSE PROVIDED BY: 12 RESPONSE PROVIDED BY: 13 Philadelphia Water Department 14 15 15 16 16 17 17 18 18 19 20 21 21 22 22 23 23 24 24 25 25 26 26 27			
3 AND FY2027, PLEASE PROVIDE A DETAILED EXPLANATION OF 4 WHETHER THE PWD GRANTS NOW PROVIDED AS "MATCHING" 5 GRANTS WILL STILL REQUIRE A MATCHING, OR WHETHER THEY 6 WILL BE PROVIDED, IF AT ALL, IRRESPECTIVE OF THE EXISTENCE OF 7 MATCHING FUNDS. 8 RESPONSE: 10 PWD does not assume an elimination of UESF grants. 11 RESPONSE PROVIDED BY: 12 RESPONSE PROVIDED BY: 13 Philadelphia Water Department 14 Image: Provide bit of the state of	1	PA-VII-13.	REFERENCE PWD ST. 5, PAGE 10: ASSUMING AN ELIMINATION, OR A
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7 MATCHING FUNDS. 8 9 9 RESPONSE: 10 PWD does not assume an elimination of UESF grants. 11 RESPONSE PROVIDED BY: 12 RESPONSE PROVIDED BY: 13 Philadelphia Water Department 14 Philadelphia Water Department 15 Philadelphia Water Department 16 Philadelphia Water Department 17 Philadelphia Water Department 18 Philadelphia Water Department 19 Philadelphia Water Department 10 Philadelphia Water Department 11 Philadelphia Water Department 12 Philadelphia Water Department 13 Philadelphia Water Department 14 Philadelphia Water Department 15 Philadelphia Water Department 16 Philadelphia Philadelphia Water Department 17 Philadelphia Philadelphia Philadelphia Philadelphia 18 Philadelphia Philadelphia 19 Philadelphia Philadelphia 10 Philadelphia Philadelphia 10 Philadelphia Philadelphia 10 <td>5</td> <td></td> <td>GRANTS WILL STILL REQUIRE A MATCHING, OR WHETHER THEY</td>	5		GRANTS WILL STILL REQUIRE A MATCHING, OR WHETHER THEY
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10 PWD does not assume an elimination of UESF grants. 11 RESPONSE PROVIDED BY: Philadelphia Water Department 13 PWD does not assume an elimination of UESF grants. 14 PWD does not assume an elimination of UESF grants. 15 Philadelphia Water Department 16 PWD does not assume an elimination of UESF grants. 17 Philadelphia Water Department 18 Philadelphia Philadelphia Philadelphia Philadelphia Philadelphia 19 Philadelphia Philadelphia Philadelphia Philadelphia 19 Philadelphia Philadelphia Philadelphia 10 Philadelphia Philadelphia Philadelphia Philadelphia 11 Philadelphia Philadelphia Philadelphia Philadelphia Philadelphia 10 Philadelphia Philadelphia Philadelphia 11 Philadelphia Philadelphia Philadelphia Philadelphia 12 Philadelphia Philadelphia 13 Philadelphia Philadelphia 14 Philadelphia Philadelphia 15 Philadelphia Philadelphia 16 Philadelphia 17 Philadelphia 18 Philadelphia 19 Philadelphia 10 Philadelphia	8		
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Public Interrogatory Set #VII - 13			Public Interrogatory Set #VII - 13

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-14.	REFERENCE PWD ST. 5: IN FY26 AND/OR FY27, WILL PWD REFUSE TO
2		ACCEPT UESF GRANTS, AND/OR REFUSE TO MATCH USEF GRANTS, IF
3		THESE GRANTS DO NOT HAVE THE EFFECT OF REDUCING
4		OUTSTANDING BALANCES TO \$0.
5		
6	RESPONSE	:
7	No, P	WD will not refuse to accept or refuse to match such UESF grants.
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9	RESPONSE	PROVIDED BY: Philadelphia Water Department and Water Revenue Bureau
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		Public Interrogatory Set #VII - 14

PA-VII-15. REFERENCE PWD ST. 5, PAGE 10: PLEASE EXPLAIN HOW THE RATE RELIEF REQUESTED IN THIS PROCEEDING WILL HELP TO ADDRESS THE FINANCIAL STRAIN ON INCOME-ELIGIBLE CUSTOMERS CAUSED BY THE END OF THE SPECIFIED PROGRAMS (E.G., LIHWAP, PAHAF, PHDC).

RESPONSE:

The statement on PWD Statement 5, page 10 refers to the financial strain on PWD caused by the significant reduction of funds provided by these programs before they ended and/or were significantly decreased. That is, PWD lost access to customer grants totaling \$5,395,903.09 from FY 2023 to FY 2024 which were not replaced by customer payments.

Note that income-eligible customers enrolled in TAP are assessed bills based on their income and will not be impacted by the requested rate relief.

RESPONSE PROVIDED BY: Water Revenue Bureau

1	PA-VII-16.	CONFIRM OR DENY: THE END OF THE WATER ASSISTANCE
2		PROGRAMS FOR INCOME-ELIGIBLE CUSTOMERS, AS SPECIFIED BY
3		PWD (E.G., LIHWAP, PAHAF, PHDC) WILL INCREASE THE FINANCIAL
4		STRAIN ON INCOME-ELIGIBLE CUSTOMERS WHO HAD PREVIOUSLY
5		RECEIVED FINANCIAL ASSISTANCE TO HELP PAY THEIR PWD BILLS
6		THROUGH THESE PROGRAMS. IF DENIED, PLEASE PROVIDE A
7		DETAILED EXPLANATION OF THE BASIS FOR THE DENIAL.
8		

RESPONSE:

PWD cannot confirm or deny how the end of water assistance programs will increase the financial strain on income-eligible customers who previously received such assistance.
PWD is without specific knowledge as to how the ending of these water assistance programs will affect any customer's individual financial stability and any response hereto would only qualify as speculation or conjecture.

RESPONSE PROVIDED BY: Water Revenue Bureau

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-17.	REFERENCE PWD ST. 3, PAGE 9: PLEASE PROVIDE A MAP OF THE
2		WATER MAIN REPLACEMENTS THAT WILL BE DONE THROUGH THE
3		\$1,008 MILLION BUDGET IN:
4		A. FY2026;
5		B. FY2027;
6		C. FY2028.
7		
8	RESPONSE	:
9	The D	Department has objected to this information request to the extent it seeks information
10	beyon	id the Rate Period (FY 2028). PWD and the Public Advocate are trying to resolve the
11	pendi	ng discovery dispute.
12		
13	Notw	ithstanding the above objections and without waiver thereof, the Department
14	respo	nds to this discovery request as follows:
15		
16	Please	e refer to response attachment PA-VII-17.
17		
18	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 17

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-18.	REFERENCE PWD ST. 3, PAGE 9: PLEASE PROVIDE A MAP OF THE
2		FAILING SEWER SYSTEM COMPONENTS THAT WILL BE
3		REPLACED/REPAIR THROUGH THE \$990 MILLION BUDGET IN:
4		A. FY2026;
5		B. FY2027;
6		C. FY2028.
7		
8	RESPONSE	:
9	The D	Department has objected to this information request to the extent it seeks information
10	beyon	d the Rate Period (FY 2028). PWD and the Public Advocate are trying to resolve the
11	pendi	ng discovery dispute.
12		
13		ithstanding the above objections and without waiver thereof, the Department
14	respoi	nds to this discovery request as follows:
15		
16	Please	e refer to response attachment PA-VII-18.
17	DESDONSE	DROVIDED DV . DI 1. 1. 1. 1. Weter Desertations
18	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 18

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-19.	REFERENCE PWD ST. 3, PAGE 12: PLEASE PROVIDE A MAP OF THE 32
2		MILES OF WATER MAIN REPLACEMENTS PER YEAR FOR:
3		A. FY2026;
4		B. FY2027;
5		C. FY2028.
6		
7	RESPONSE	:
8	The D	Department has objected to this information request to the extent it requests
9	inform	nation beyond the Rate Period (FY 2028). PWD and the Public Advocate are trying
10	to reso	olve the pending discovery dispute.
11		
12		ithstanding the above objections and without waiver thereof, the Department
13	respoi	nds to this discovery request as follows:
14 15	Dlaga	a second a man and DA VII 17
15 16	Please	e refer to response attachment PA-VII-17.
10	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 19
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		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-20.	REFERENCE PWD ST. 3, PAGE 12-13: PLEASE PROVIDE A MAP OF THE
2		WATER MAIN BREAKS PER YEAR FOR THE PAST FIVE YEARS
3		UNDERLYING THE CALCULATION OF A FIVE-YEAR AVERAGE BREAKS
4		PER 100 MILES OF 24 BREAKS PER YEAR.
5		
6	RESPONSE	:
7	The D	Department has objected to this information request. PWD and the Public Advocate
8	are try	ying to resolve the pending discovery dispute.
9		
10	Subje	ct to and without waiving the pending objection, response attachment PA-VII-20 is
11	provid	ded. Note – FY 2024 is not available at this time.
12		
13	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 20

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-21.	REFERENCE PWD ST. 3, PAGE 14: PLEASE PROVIDE MAPS OF:
2		A. THE 13 MILES OF SEWER REPLACEMENT OR REHABILITATION IN
3		FY2025;
4		B. THE 14 MILES OF SEWER REPLACEMENT OR REHABILITATION IN
5		FY2026;
6		C. THE 15 MILES OF SEWER REPLACEMENT OR REHABILITATION IN
7		FY2027.
8		
9	RESPONSE	:
10		Department has objected to this information request. PWD and the Public Advocate
11	are try	ving to resolve the pending discovery dispute.
12		
13		ithstanding the above objections and without waiver thereof, the Department
14	respoi	nds to this discovery request as follows:
15	Dlagg	a refer to receive attachment DA VII 19
16 17	Please	e refer to response attachment PA-VII-18.
17	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 21

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-22.	REFERENCE PWD ST. 3, PAGE 15: PLEASE PROVIDE A LIST OF ALL
2		"GRANT OPPORTUNITIES" WHICH PWD IS "ACTIVELY PURSUING" TO
3		HELP OFFSET THE COSTS OF LEAD SERVICE LINE REPLACEMENT.
4		SEPARATELY PROVIDE:
5		A. A LIST OF THE GEOGRAPHIC LOCATION OF ALL SERVICE LINE
6		REPLACEMENT GRANT OPPORTUNITY BEING "ACTIVELY PURSUED";
7		B. A COPY OF EACH GRANT APPLICATION BEING "ACTIVELY
8		PURSUED."
9		C. A COPY OF EACH NOTICE OF THE AVAILABILITY OF FUNDING
10		FROM WHICH ONE OR MORE GRANTS ARE BEING "ACTIVELY
11		PURSUED."
12		
13	RESPONSE	:
14	Please	e see Section 7 of the Quarterly Reports filed with the Philadelphia Water, Sewer and
15	Storm	Water Rate Board ("Rate Board"). The table presented in Section 7 identifies the
16	assista	ance program and amount of funding support received. The Water Department
17	contir	nues to pursue various state and federal funding opportunities.
18		
19	In add	lition, please see Section 9 of the above referenced Quarterly Reports. PWD is
20	evalua	ating future PENNVEST loan opportunities and will continue to pursue low-interest
21	financ	cing options and grants (where available) to support the CIP.
22		
23	Please	e also see page FSP-33 of Statement 2A Schedule FP-1 for a listing of State and
24	Feder	al assistance.
25		
26	RESPONSE	PROVIDED BY: Philadelphia Water Department
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28		
		Public Interrogatory Set #VII - 22

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory		
PA-VII-23.	REFERENCE PWD ST. 3, SCHEDULE CP-1, PAGE 265: PLEASE PROVIDE		
	ALL REQUESTS FROM THE CITY BUDGET OFFICE TO PWD REGARDING		
	NEW CAPITAL SPENDING FOR QUANTITATIVE AND QUALITATIVE		
	INFORMATION ABOUT THE IMPACT OF NEW FUNDING ON RACIAL		
	DISPARITIES.		
	A. SEPARATELY PROVIDE ALL RESPONSES PROVIDING THE		
	REQUESTED QUANTITATIVE AND QUALITATIVE INFORMATION		
	ABOUT THE IMPACT OF NEW FUNDING ON RACIAL DISPARITIES.		
RESPONSE	:		
The	Department has objected to this information request. PWD and the Public Advocate		
are tr	rying to resolve the pending discovery dispute.		
	vithstanding the above objections and without waiver thereof, the Department		
respo	responds to this discovery request as follows:		
Pleas	se refer to response attachment PA-VII-24.		
RESPONSE	PROVIDED BY: Philadelphia Water Department		

1	PA-VII-24.	REFERENCE PWD ST. 3, SCHEDULE CP-1, PAGE 266: PLEASE PROVIDE
2		ALL PWD RESPONSES TO THE FOLLOWING QUESTIONS STATED TO
3		HAVE BEEN POSED TO PWD IN THE CITY BUDGETING PROCESS:
4		A. PLEASE BRIEFLY DESCRIBE HOW THE CORE FUNCTIONS OF YOUR
5		AGENCY INTERSECT WITH THE CITY'S VISION FOR RACIAL EQUITY.
6		WHAT MAJOR AREAS OF OPPORTUNITY ARE THERE FOR YOU TO
7		ADVANCE RACIAL EQUITY AS PART OF THE CORE WORK YOUR
8		DEPARTMENT PERFORMS?
9		B. WHAT CRITICAL PROGRAMS, INITIATIVES, OR POLICIES DOES
10		YOUR OFFICE ADMINISTER WITH YOUR CURRENT BUDGET TO
11		IMPROVE RACIAL EQUITY? IN BRIEFLY DESCRIBING THIS PROGRAM,
12		INITIATIVE, OR POLICY, PLEASE INCLUDE (A) HOW YOU MEASURE ITS
13		SUCCESS (INCLUDING ANY PERFORMANCE MEASURES AND/OR
14		DATA/TOOLS AVAILABLE), (B) OBSERVABLE STRENGTHS IN
15		ADVANCING RACIAL EQUITY, AND (C) OBSERVABLE CHALLENGES
16		OR OPPORTUNITIES FOR GROWTH IN ADVANCING RACIAL EQUITY.
17		C. IS THERE ANY CRITICAL UNMET NEED WITHIN YOUR BUDGET
18		THAT INHIBITS YOUR DEPARTMENT'S ACHIEVEMENT OF ITS
19		GREATEST RACIAL EQUITY PRIORITIES? IF SO, BRIEFLY DESCRIBE.
20		D. HOW HAVE YOU INVOLVED INTERNAL AND EXTERNAL
21		STAKEHOLDERS, INCLUDING MARGINALIZED COMMUNITIES OF
22		COLOR, IN YOUR DEPARTMENT'S BUDGET PROCESS?
23		NOTE THAT THIS QUESTION IS NOT ASKING PWD TO DEVELOP NEW
24		RESPONSES TO THESE QUESTIONS. RATHER, THE APPENDIX TO THE
25		CAPITAL PANEL TESTIMONY STATES THAT "DEPARTMENTS WERE
26		THEN ASKED TO RESPOND TO THE FOLLOWING QUESTIONS" WE
27		ARE ASKING FOR PWD'S RESPONSE TO THOSE QUESTIONS.
28		

	Kesponse to I A interrogatory
1	RESPONSE:
2	The Department has objected to this information request. PWD and the Public Advocate
3	are trying to resolve the pending discovery dispute.
4	
5	Notwithstanding the above objections and without waiver thereof, the Department
6	responds to this discovery request as follows:
7	
8	Please refer to response attachment PA-VII-24.
9	
10	RESPONSE PROVIDED BY: Philadelphia Water Department
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	Public Interrogatory Set #VII - 25

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-25.	REFERENCE PWD ST. 3, SCHEDULE CP-1, PAGE 270: PROVIDE THE
2		MOST RECENT THREE CAPITAL PROGRAMS PREPARED BY THE CITY
3		PLANNING COMMISSION AND THE BUDGET OFFICE PRESENTING THE
4		CAPITAL EXPENDITURES FOR PWD FOR EACH OF THE SIX ENSUING
5		FISCAL YEARS, INCLUDING:
6		A. THE ESTIMATED COST OF EACH PROJECT; AND
7		B. THE SOURCE OF FUNDING (LOCAL, COMMONWEALTH, FEDERAL
8		AND PRIVATE) FOR EACH PROJECT ESTIMATED TO BE REQUIRED TO
9		FINANCE EACH PROJECT.
10		
11	RESPONSE:	
12	The la	st three capital budgets that were submitted to the City Planning Commission are
13	availa	ble here:
14		
15	Capital Program and Budget Philadelphia City Planning Commission City of	
16	Philad	elphia
17		
18	Cost f	or each capital project line, and funding source is provided in the documentation.
19		
20	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 26

1	PA-VII-26.	REFERENCE PWD ST. 4B, PAGE 6: PLEASE PROVIDE BY YEAR FOR THE
2		PAST THREE YEARS THE TOTAL NUMBER OF RESIDENTIAL LEAD
3		SERVICE LINE REPLACEMENTS FROM THE MAIN THROUGH TO THE
4		METER IDENTIFYING (A) THE NUMBER REPLACED THROUGH WATER
5		MAIN REPLACEMENTS, AND (B) THE NUMBER REPLACED THROUGH
6		HELP LOANS.
7		
8	RESPONSE	:
9	The D	Department has objected to this information request. PWD and the Public Advocate
10	are try	ving to resolve the pending discovery dispute.
11		
12	Notwi	ithstanding the above objections and without waiver thereof, the Department
13	respon	nds to this discovery request as follows:
14	•	LSLR through Water Main Replacements:
15		o 2022: 200
16		o 2023: 173
17		o 2024: 989
18	•	HELP:
19		o 2022: 49
20		o 2023: 29
21		o 2024: 38
22		
23	RESPONSE	PROVIDED BY: Philadelphia Water Department
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25 26		
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		Public Interrogatory Set #VII - 27

PA-VII-27.REFERENCE PWD ST. 4B, PAGE 6: PLEASE PROVIDE BY YEAR FOR THE
PAST THREE YEARS THE TOTAL NUMBER OF RESIDENTIAL LEAD
SERVICE LINE REPLACEMENTS FROM THE MAIN TO THE CURB STOP
(BUT NOT FROM THE CURB STOP TO THE METER) IDENTIFYING (A)
THE NUMBER REPLACED THROUGH WATER MAIN REPLACEMENTS,
AND (B) THE NUMBER REPLACED THROUGH HELP LOANS.

RESPONSE:

The Department has objected to this information request. PWD and the Public Advocate are trying to resolve the pending discovery dispute.

Notwithstanding the above objections and without waiver thereof, the Department responds to this discovery request as follows:

- All service lines from the main to curb are replaced (regardless of previous material). PWD offers to replace any lead service line found from the curb to the meter when installing new mains at no cost to the customer. PWD makes two outreach attempts via mail and multiple attempts while work in on-going in the field. However, PWD cannot perform the replacement of a lead service line from the curb to the meter without authorization from the property. We do not have an annual breakdown of the number of lead service lines from curb to main that were not replaced, however, there have been 465 not replaced from October 2016 through 2024.
- When Lead Service Lines are replaced through the HELP program, the plumbers do not leave any lead service line materials in service. While only one side of the line (main to curb or curb to meter) is replaced in some cases, that only occurs when the other side of the line is already non-lead. If both sides of the line are lead, they are both replaced.

RESPONSE PROVIDED BY: Philadelphia Water Department

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
PA-VII-28.	REFERENCE PWD ST. 4B, PAGES 7 & 10: PLEASE PROVIDE THE
	CURRENT INVENTORY OF COMPOSITION OF SERVICE LINES
	SHOWING, IN PARTICULAR, THE NUMBER OF LEAD, GALVANIZED,
	AND UNKNOWN SERVICE LINES.
RESPONSE	:
	ce line inventory information is available online at <u>https://water.phila.gov/service-</u>
<u>line/</u> . 1	Information is regularly updated.
As of	3/15/2025:
	• 15,297 Lead
	 1,623 Galvanized Requiring Replacement 02 208 Non-load
	 92,208 Non-lead 417,238 Unknown
	0 417,236 Olikhown
RESPONSE	PROVIDED BY: Philadelphia Water Department
	Public Interrogatory Set #VII - 29
	RESPONSE Servio <u>line/</u> . As of

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-29.	REFERENCE PWD ST. 4B, PAGE 8: PLEASE PROVIDE THE ANNUAL
2		BUDGET FOR FY2026, FY2027 AND FY2028 FOR SERVICE LINE
3		REPLACEMENTS, ASSUMING:
4		A. 2,000 SERVICE LINE REPLACEMENTS PER YEAR;
5		B. 2,500 SERVICE LINE REPLACEMENTS PER YEAR.
6		
7	RESPONSE	:
8	The D	Department has objected to this information request to the extent it seeks information
9	beyon	d the Rate Period (FY 2028). PWD and the Public Advocate are trying to resolve the
10	pendi	ng discovery dispute.
11		
12	Notwi	thstanding the above objections and without waiver thereof, the Department
13	respoi	nds to this discovery request as follows:
14		
15	The W	Vater Department has proposed a capital budget of \$25 million in FY26 and \$24
16	millio	n in FY27. It is anticipated that this funding could be used to replace up to 2,500
17	lead s	ervice lines. Some services require replacement of the full service line while others
18		equire partial replacement so the price per service will vary. It is important to note
19		l lead service lines are privately owned and replacement is ultimately the
20	respoi	nsibility of the homeowner.
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22	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 30

1	PA-VII-30.	REFERENCE PWD ST. 4B, PAGE 8: PLEASE PROVIDE A DETAILED	
2		EXPLANATION OF HOW PWD WILL CONFORM ITS BUDGET SPENDING	
3		FOR LEAD SERVICE LINE REPLACEMENTS TO THE DOLLARS FOR	
4		LEAD SERVICE LINE REPLACEMENTS INCLUDED IN RATES SHOULD	
5		THE ACTUAL NUMBER OF SERVICE LINE REPLACEMENTS BE MORE	
6		OR LESS THAN THE NUMBER FOR WHICH BUDGETED DOLLARS ARE	
7		INCLUDED IN RATES.	
8			
9	RESPONSE:		
10	Budge	t for lead service line replacement is included in overall appropriations which will	
11	be exp	bended over a number of years.	
12			
13	Lead s	service line related capital expenses will be partially offset by grants. The majority	
14	of the	remaining costs will inform debt issuance (including revenue bonds and loans) and	
15	the associated debt service to be covered by rates and charges.		
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17	RESPONSE	PROVIDED BY: Philadelphia Water Department	
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		Public Interrogatory Set #VII - 31	
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		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-31.	REFERENCE PWD ST. 4B, AT 8: PLEASE PROVIDE A LIST OF ALL
2		"PROCESSES" THAT PWD IS "WORKING ON" TO INCREASE THE RATE
3		OF REPLACEMENT OF LEAD SERVICE LINES.
4		
5	RESPONSE	:
6		• PWD already replaces lead service lines that are encountered during water
7		main replacement projects and allows for HELP loan coverage for customers
8		interested in proactively replacing their lead service line.
9		• PWD is currently working on two pilot projects that would provide proactive
10		replacement of lead service lines independent of water main replacement.
11		• As all lead service lines are privately owned, PWD requires authorization from
12		the property owner to perform replacements. PWD is currently working to
13		make the required Right of Entry form more accessible by placing it online and
14		allowing for electronic signatures.
15		• PWD will actively engage in a public education campaign to inform and raise
16		awareness among the community. This campaign will focus on the risks
17		associated with lead exposure, the importance of service line replacement, and
18		individual actions that can be taken to minimize exposure. By empowering the
19		public with knowledge, PWD can facilitate informed decision-making and
20		encourage active participation in the program.
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22	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 32
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PA-VII-32.REFERENCE PWD ST. 4B, PAGE 14: PLEASE PROVIDE A LIST OF ALL
PROJECTS ASSOCIATED WITH THE INITIAL PREPARATION TO MEET
PFAS MCLS PLANNED FOR FY2026, FY2027, AND FY2028.

RESPONSE:

Please see table below for a list of projects responsive to this request. Also note that projects listed are not solely related to PFAS.

Associated WTP	Project	Target Bid Year
Belmont	Reservoir Dredging + Disposal	FY27
Belmont	PAC System Construction	FY27
Queen Lane	QL Lagoon Sitework	FY26
Queen Lane	Reservoir Dredging + Disposal	FY26
Queen Lane	PAC System Construction	

RESPONSE PROVIDED BY: Philadelphia Water Department

Public Interrogatory Set #VII - 33

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-33.	REFERENCE PWD 4B, PAGE 14: SEPARATELY PROVIDE ALL
2		SUBMISSIONS TO THE PLANNING COMMISSION AND/OR BUDGET
3		OFFICE FOR THE PROJECTS LISTED IN THE IMMEDIATELY PRECEDING
4		REQUEST.
5		
6	RESPONSE	:
7	Please	e see response to PA-VII-25.
8		
9	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 34

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-34. REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE
2	REPLACEMENT APPLICATION: PLEASE PROVIDE A COPY OF PWD'S
3	OCTOBER 24, 2024 LEAD SERVICE LINE INVENTORY.
4	
5	RESPONSE:
6	The Department has objected to this information request. PWD and the Public Advocate
7	are trying to resolve the pending discovery dispute.
8	
9	Notwithstanding the above objections and without waiver thereof, the Department
10	responds to this discovery request as follows:
11	
12	Please see response to PA-VII-28.
13	
14	RESPONSE PROVIDED BY: Philadelphia Water Department
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	Public Interrogatory Set #VII - 35

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory	
1	PA-VII-35.	REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE	
2		REPLACEMENT APPLICATION: PLEASE PROVIDE THE BASIS FOR	
3		ESTIMATING THAT THERE ARE 20,000 LEAD SERVICE LINES IN NEED	
4		OF REPLACEMENT.	
5			
6	RESPONSE	:	
7	The D	Department has objected to this information request. PWD and the Public Advocate	
8	are try	ying to resolve the pending discovery dispute.	
9			
10	Notw	ithstanding the above objections and without waiver thereof, the Department	
11	respo	nds to this discovery request as follows:	
12			
13	The e	stimate of 20,000 lead service lines covers the entire City, not just West	
14	Philadelphia. Estimates are approximately 5% of the service lines in the system are either		
15	lead service lines (LSL) or galvanized requiring replacement (GRR). This estimation is		
16	derive	ed from the analysis of historical infrastructure records and ordinances, field	
17	inspec	ctions, and other relevant data sources used to assess the composition of service	
18	lines.		
19			
20	RESPONSE	PROVIDED BY: Philadelphia Water Department	
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		Public Interrogatory Set #VII - 36	
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PA-VII-36. **REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE** 2 **REPLACEMENT APPLICATION: PLEASE PROVIDE THE BASIS FOR** 3 ESTIMATING THE COST OF \$232 MILLION TO \$382 MILLION TO 4 **REPLACE KNOWN LEAD SERVICE LINES. SEPARATELY EXPLAIN THE** 5 DIFFERENCE BETWEEN THE BASIS FOR THE HIGHER AND LOWER COST ESTIMATES. 6

RESPONSE:

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The Department has objected to this information request. PWD and the Public Advocate are trying to resolve the pending discovery dispute.

Notwithstanding PWD objections and without waiver thereof, the Department responds to this discovery request as follows:

The estimated cost of \$232 million to \$387 million is based on replacement of services throughout the City, not just West Philadelphia. The high and low estimates are based on a combination of the range of estimated service lines requiring replacement, the range of expected cost based on a full or partial replacement, and anticipated project management fees. Individual replacement costs will vary dependent upon project award. This estimate should be expected to be updated as the program progresses.

RESPONSE PROVIDED BY: Philadelphia Water Department

REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE PA-VII-37. 2 **REPLACEMENT APPLICATION: PLEASE PROVIDE A COST ESTIMATE** 3 FOR REPLACING LEAD SERVICE LINES GIVEN A REASONABLE 4 ESTIMATE OF THE PROPORTION OF LINES WITH CURRENTLY 5 "UNKNOWN" COMPOSITION THAT WOULD NEED TO BE REPLACED. PROVIDE THE BASIS FOR THE COST ESTIMATE(S). 6

RESPONSE:

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The Department has objected to this information request. PWD and the Public Advocate are trying to resolve the pending discovery dispute.

Notwithstanding PWD objections and without waiver thereof, the Department responds to this discovery request as follows:

- It is estimated that, citywide, approximately 5% of the total number of service lines in the system are either lead service lines (LSL) or galvanized requiring replacement (GRR). This estimation is derived from the analysis of historical infrastructure records and ordinances, field inspections, and other relevant data sources used to assess the composition of service lines.
- It is estimated that it will cost \$232 million to \$387 million to replace the lead and galvanized requiring replacement services throughout the City. The high and low estimates are based on a combination of the range of estimated service lines requiring replacement, the range of expected cost based on a full or partial replacement, and anticipated project management fees. Individual replacement costs will vary dependent upon project award. This estimate should be expected to be updated as the program progresses.

RESPONSE PROVIDED BY: Philadelphia Water Department

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
PA-VII-38.	REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE
	REPLACEMENT APPLICATION: PLEASE PROVIDE THE MOST RECENT
	THREE SUBMISSIONS TO THE CITY PLANNING COMMISSION AND
	CITY BUDGET OFFICE SETTING FORTH PWD'S PROPOSED SIX YEAR
	CAPITAL PLAN FOR:
	A. REPLACING KNOWN LEAD SERVICE LINES IN NEED OF
	REPLACEMENT;
	B. REPLACING ESTIMATED LEAD SERVICE LINES IN NEED OF
	REPLACEMENT.
RESPONSE	:
The D	Department has objected to this information request. PWD and the Public Advocate
are try	ying to resolve the pending discovery dispute.
	ithstanding PWD objections and without waiver thereof, the Department responds to
this di	iscovery request as follows:
The V	Vater Department has not historically designated lead service line replacement cost in
our ca	apital budgets. In previous years, any lead service line replacement was a conducted
throug	gh our water main replacement program. Moving forward, PWD is budgeting for \$25
millio	n, and \$24 million in FY26 and FY27 for dedicated lead service line replacement.
RESPONSE	PROVIDED BY: Philadelphia Water Department

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-39.	REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE
2		REPLACEMENT APPLICATION: PLEASE IDENTIFY AND PROVIDE MAPS
3		OF THE "HISTORICALLY UNDERSERVED AREAS" REFERENCED IN
4		THIS APPLICATION. SEPARATELY DEFINE WHAT CONSTITUTES A
5		"HISTORICALLY UNDERSERVED AREA."
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7	RESPONSE	:
8	The D	epartment has objected to this information request. PWD and the Public Advocate
9	are try	ving to resolve the pending discovery dispute.
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11	Notwi	thstanding PWD objections and without waiver thereof, the Department responds to
12	this di	scovery request as follows:
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14		PWD utilized the following map for underserved data:
15		PennEnviroScreen (<u>https://gis.dep.pa.gov/PennEnviroScreen/</u>) maps.
16		
17		The following website includes the requested definition and associated screening
18		tool:
19 20		https://www.pa.gov/agencies/dep/public-participation/office-of-environmental-
20		justice/pa-environmental-justice- areas.html#:~:text=For%20the%20purposes%20of%20the,or%20more%20of%20t
22		he%20population
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24	RESPONSE	PROVIDED BY: Philadelphia Water Department
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		Public Interrogatory Set #VII - 40

1	PA-VII-40.	REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE
2		REPLACEMENT APPLICATION: PLEASE IDENTIFY AND DESCRIBE THE
3		EXTENT TO WHICH LEAD SERVICE LINE REPLACEMENT
4		IMPLEMENTATION IS DEPENDENT UPON PENNVEST SRF FUNDS
5		("DEPENDENT" MEANING THAT WITHOUT WHICH THE
6		REPLACEMENTS WILL NOT OCCUR).
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8	RESPONSE	
9	The D	epartment has objected to this information request. PWD and the Public Advocate
10	are try	ring to resolve the pending discovery dispute.
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12	Notwi	thstanding PWD objections and without waiver thereof, the Department responds to
13	this di	scovery request as follows:
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15	Lead 1	ine replacement implementation is heavily dependent on grants and low interest
16	loans	from the PennVest SRF. Otherwise, this will impact and constrain the number of
17	lines I	WD is able to complete.
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19	RESPONSE	PROVIDED BY: Philadelphia Water Department
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	<u> </u>	Public Interrogatory Set #VII - 41

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory			
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1	PA-VII-41. PLEASE IDENTIFY THE SPECIFIC APPROPRIATION OR SOURCE OF			
2 3	PROGRAM FUNDING FOR PENNVEST DOLLARS FOR WHICH PWD HAS APPLIED FOR FUNDING.			
3 4	APPLIED FOR FUNDING.			
4 5	RESPONSE:			
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7	PENNVEST is funded via the U.S. Environmental Protection Agency.			
8	RESPONSE PROVIDED BY: Philadelphia Water Department			
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	Public Interrogatory Set #VII - 42			

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-VII-42. REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE
2	REPLACEMENT APPLICATION: PLEASE EXPLAIN HOW LEAD SERVICE
3	LINE REPLACEMENTS WILL IMPROVE THE SITUATION FOR RENTERS.
4	
5	RESPONSE:
6	The Department has objected to this information request. PWD and the Public Advocate
7	are trying to resolve the pending discovery dispute.
8	
9	Notwithstanding PWD objections and without waiver thereof, the Department responds to
10	this discovery request as follows:
11	• Replacement of a residential lead service line reduces the risk of lead exposure
12	for both renters and homeowners alike.
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14	RESPONSE PROVIDED BY: Philadelphia Water Department
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	Public Interrogatory Set #VII - 43

PA-VII-43. REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE REPLACEMENT APPLICATION: PLEASE PROVIDE A DETAILED DESCRIPTION OF HOW PENNVEST GRANTS AND/OR LOANS DEVOTED TO LEAD SERVICE LINE REPLACEMENTS WILL BE ACCESSED BY INDIVIDUAL HOUSEHOLDS IN PHILADELPHIA.

RESPONSE:

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The Department has objected to this information request. PWD and the Public Advocate are trying to resolve the pending discovery dispute.

Notwithstanding PWD objections and without waiver thereof, the Department responds to this discovery request as follows:

 PennVEST funding will be utilized by PWD to fund pilot projects for replacement of lead and galvanized requiring replacement service lines in targeted neighborhoods. This funding will not be directly accessible to individual households. However, within the project area, homeowners with known lead service lines will be encouraged to complete Right of Entry forms and allow PWD to coordinate replacement of any portions of their service that is lead.

RESPONSE PROVIDED BY:

Philadelphia Water Department

Public Interrogatory Set #VII - 44

PA-VII-44. REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE REPLACEMENT APPLICATION: PLEASE PROVIDE A DETAILED DESCRIPTION OF THE DIFFERENCE IN THE WAYS BY WHICH INDIVIDUAL HOUSEHOLDS WILL ACCESS LEAD SERVICE LINE REPLACEMENT FUNDS DEPENDING ON WHETHER THEY ARE RENTERS OR HOMEOWNERS.

RESPONSE:

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The Department has objected to this information request. PWD and the Public Advocate are trying to resolve the pending discovery dispute.

Notwithstanding PWD objections and without waiver thereof, the Department responds to this discovery request as follows:

 PennVEST funding will be utilized by PWD to fund pilot projects for replacement of lead and galvanized requiring replacement service lines in targeted neighborhoods. This funding will not be directly accessible to individual households. However, within the project area, homeowners with known lead service lines will be encouraged to complete Right of Entry forms and allow PWD to coordinate replacement of any portions of their service that is lead. Rental and owner-occupied house are both eligible for replacement, but the Right of Entry requires the owner's signature.

RESPONSE PROVIDED BY:

Philadelphia Water Department

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory			
PA	A-VII-45.	APPLICATION FOR PROJECT #512033182411, PAGE 22 OF 27: PLEASE			
		PROVIDE THE BASIS FOR:			
		A. THE 2023 AVERAGE ANNUAL RESIDENTIAL BILL OF \$339;			
		B. THE ESTIMATE THAT 100% OF RESIDENTIAL BILLS LEVIED WILL F			
		COLLECTED IN 2023;			
		C. THE 2029 AVERAGE ANNUAL RESIDENTIAL BILL OF \$521;			
	D. THE ESTIMATE THAT 100% OF THE RESIDENTIAL BILLS LEVIED				
		WILL BE COLLECTED IN 2029.			
RI	ESPONSE	:			
The Department has objected to this information request. PWD and the Public Advocate					
	are trying to resolve the pending discovery dispute.				
	Notwithstanding PWD objections and without waiver thereof, the Department responds				
	this discovery request as follows:				
	A. FY23 is based on actual revenue collected.				
	B. FY23 revenue presented in the application was based on actual revenue				
	collected not billed, therefore 100% of "bills" as presented were collected.				
	C. 2029 was based on estimated cumulative revenue adjustments from financial				
	projections available at the time of application preparation.				
		D. See response as to B above.			
RI	ESPONSE	PROVIDED BY: Philadelphia Water Department			