

RESPONSE TO
PUBLIC ADVOCATE'S INTERROGATORIES
AND
REQUESTS FOR PRODUCTION OF DOCUMENTS
QUESTIONS 1-45

Dated: March 2025

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

8
9 **RESPONSE:**

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

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17 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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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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10 **RESPONSE:**

11 See response to PA-VII-1.
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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-VII-3.** GIVEN THAT PWD STAFFPERSON LAURA COPELAND IS A MEMBER OF
2 THE BOARD OF DIRECTORS OF UESF, PLEASE PROVIDE PWD'S
3 UNDERSTANDING OF WHAT HAPPENS TO FUNDING THAT UESF HAS
4 RECEIVED IN A FISCAL YEAR FOR UTILITY GRANTS, IF SAID FUNDING
5 IS NOT DISTRIBUTED.

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7 **RESPONSE:**

8 See response to PA-VII-1
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10 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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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.
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9 **RESPONSE:**

10 See PWD 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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1 **PA-VII-5.** 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 RULES GOVERNING THE DISTRIBUTION OF
4 USEF GRANTS FOR UTILITY ASSISTANCE, IDENTIFYING ANY
5 DIFFERENCES BETWEEN RULES APPLICABLE TO (A) THE
6 PHILADELPHIA WATER DEPARTMENT, (B) PHILADELPHIA GAS
7 WORKS, AND (C) PECO ENERGY.
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9 **RESPONSE:**

10 See response to PA-VII-1. Please also refer to UESF website for additional information
11 from the agency to which the discovery request should be directed. UESF is not a party to
12 this proceeding.
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14 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-VII-6.** 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 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.

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8 **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.

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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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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 response 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 proceeding.

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15 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-VII-8.** GIVEN THAT PWD STAFFPERSON LAURA COPELAND IS A MEMBER OF
2 THE BOARD OF DIRECTORS OF UESF, PLEASE PROVIDE PWD'S
3 UNDERSTANDING OF, AND A COPY OF, ANY WRITTEN AGREEMENT
4 BETWEEN THE CITY OF PHILADELPHIA AND UESF REGARDING THE
5 RECEIPT BY UESF AND DISTRIBUTION BY UESF OF CITY FUNDS FOR
6 UTILITY ASSISTANCE.

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8 **RESPONSE:**

9 Please see response attachment PA-VII-8.

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11 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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1 **PA-VII-9.** GIVEN THAT PWD STAFFPERSON LAURA COPELAND IS A MEMBER OF
2 THE BOARD OF DIRECTORS OF UESF, PLEASE PROVIDE PWD'S
3 UNDERSTANDING OF WHETHER THE DISTRIBUTION OF UESF
4 DOLLARS BETWEEN PWD, PGW AND PECO IS SOLELY WITHIN THE
5 DISCRETION OF UESF.
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7 **RESPONSE:**

8 Please see response attachment PA-VII-8.
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10 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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PA-VII-10. REFERENCE PWD ST. 5: PLEASE PROVIDE:

A. THE DOLLARS BUDGETED FOR “MATCHING GRANTS” FOR EACH
FISCAL YEAR FY2025 – FY2027.

B. OF THE DOLLARS BUDGETED FOR MATCHING GRANTS, THE
DOLLARS PROPOSED TO BE RECOVERED THROUGH RATES.

RESPONSE:

A. For the purposes of this response, we have assumed that “Matching Grants” refers to
UESF related grants funded by the Water Department. The FY 2025 budgeted amount
for “matching grants” is approximately \$300,000 and projected to remain constant for
FY 2026 and FY 2027. Please see Table 1-5 and Table 2-1 of Schedule BV-2.

B. UESF matching grants are included as both a miscellaneous revenue as well as a Class
500 expense. Therefore, there is no impact on the net revenue requirements to be
recovered through rates.

RESPONSE PROVIDED BY: Philadelphia Water Department and Black & Veatch
Management Consulting, LLC

PA-VII-11. BY MONTH FOR FY2024 AND FY2025 TO DATE, PLEASE PROVIDE:

A. THE NUMBER OF ACCOUNTS RECEIVING ASSISTANCE THROUGH UESF;

B. THE DOLLARS OF ASSISTANCE RECEIVED THROUGH UESF;

C. THE NUMBER OF ACCOUNTS RECEIVING ASSISTANCE THROUGH PAHAF;

D. THE DOLLARS OF ASSISTANCE RECEIVED THROUGH PAHAF.

RESPONSE:

Please see response attachment PA-VII-11.

RESPONSE PROVIDED BY: Water Revenue Bureau

PA-VII-12. REFERENCE PWD ST. 5, PAGE 10: ASSUMING AN ELIMINATION, OR A SUBSTANTIAL REDUCTION, IN UESF GRANTS RECEIVED IN FY2026 AND FY2027, PLEASE PROVIDE A DETAILED EXPLANATION OF THE MEANS, IF ANY, BY WHICH PWD WILL REPLACE THOSE DOLLARS FOR PURPOSES OF PROVIDING GRANTS.

RESPONSE:

The expectation is that PWD will see the amounts of grants per the UESF agreement. See response attachment PA-VII-8.

RESPONSE PROVIDED BY: Philadelphia Water Department

PA-VII-13. REFERENCE PWD ST. 5, PAGE 10: ASSUMING AN ELIMINATION, OR A SUBSTANTIAL REDUCTION, IN UESF GRANTS RECEIVED IN FY2026 AND FY2027, PLEASE PROVIDE A DETAILED EXPLANATION OF WHETHER THE PWD GRANTS NOW PROVIDED AS “MATCHING” GRANTS WILL STILL REQUIRE A MATCHING, OR WHETHER THEY WILL BE PROVIDED, IF AT ALL, IRRESPECTIVE OF THE EXISTENCE OF MATCHING FUNDS.

RESPONSE:

PWD does not assume an elimination of UESF grants.

RESPONSE PROVIDED BY: Philadelphia Water Department

PA-VII-14. REFERENCE PWD ST. 5: IN FY26 AND/OR FY27, WILL PWD REFUSE TO
ACCEPT UESF GRANTS, AND/OR REFUSE TO MATCH USEF GRANTS, IF
THESE GRANTS DO NOT HAVE THE EFFECT OF REDUCING
OUTSTANDING BALANCES TO \$0.

RESPONSE:

No, PWD will not refuse to accept or refuse to match such UESF grants.

RESPONSE PROVIDED BY: Philadelphia Water Department and Water Revenue Bureau

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

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7 **RESPONSE:**

8 The statement on PWD Statement 5, page 10 refers to the financial strain on PWD caused
9 by the significant reduction of funds provided by these programs before they ended and/or
10 were significantly decreased. That is, PWD lost access to customer grants totaling
11 \$5,395,903.09 from FY 2023 to FY 2024 which were not replaced by customer payments.

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

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16 **RESPONSE PROVIDED BY:** Water Revenue Bureau
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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.
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9 **RESPONSE:**

10 PWD cannot confirm or deny how the end of water assistance programs will increase the
11 financial strain on income-eligible customers who previously received such assistance.
12 PWD is without specific knowledge as to how the ending of these water assistance
13 programs will affect any customer's individual financial stability and any response hereto
14 would only qualify as speculation or conjecture.
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16 **RESPONSE PROVIDED BY:** Water Revenue Bureau
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PA-VII-17. REFERENCE PWD ST. 3, PAGE 9: PLEASE PROVIDE A MAP OF THE
WATER MAIN REPLACEMENTS THAT WILL BE DONE THROUGH THE
\$1,008 MILLION BUDGET IN:

A. FY2026;

B. FY2027;

C. FY2028.

RESPONSE:

The Department has objected to this information request to the extent it seeks information beyond the Rate Period (FY 2028). 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:

Please refer to response attachment PA-VII-17.

RESPONSE PROVIDED BY: Philadelphia Water Department

PA-VII-18. REFERENCE PWD ST. 3, PAGE 9: PLEASE PROVIDE A MAP OF THE
FAILING SEWER SYSTEM COMPONENTS THAT WILL BE
REPLACED/REPAIR THROUGH THE \$990 MILLION BUDGET IN:
A. FY2026;
B. FY2027;
C. FY2028.

RESPONSE:

The Department has objected to this information request to the extent it seeks information beyond the Rate Period (FY 2028). 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:

Please refer to response attachment PA-VII-18.

RESPONSE PROVIDED BY: Philadelphia Water Department

PA-VII-19. REFERENCE PWD ST. 3, PAGE 12: PLEASE PROVIDE A MAP OF THE 32
MILES OF WATER MAIN REPLACEMENTS PER YEAR FOR:
A. FY2026;
B. FY2027;
C. FY2028.

RESPONSE:

The Department has objected to this information request to the extent it requests
information beyond the Rate Period (FY 2028). 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:

Please refer to response attachment PA-VII-17.

RESPONSE PROVIDED BY: Philadelphia Water Department

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.

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6 **RESPONSE:**

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

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10 Subject to and without waiving the pending objection, response attachment PA-VII-20 is
11 provided. Note – FY 2024 is not available at this time.

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13 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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PA-VII-21. REFERENCE PWD ST. 3, PAGE 14: PLEASE PROVIDE MAPS OF:

A. THE 13 MILES OF SEWER REPLACEMENT OR REHABILITATION IN
FY2025;

B. THE 14 MILES OF SEWER REPLACEMENT OR REHABILITATION IN
FY2026;

C. THE 15 MILES OF SEWER REPLACEMENT OR REHABILITATION IN
FY2027.

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:

Please refer to response attachment PA-VII-18.

RESPONSE PROVIDED BY: Philadelphia Water Department

PA-VII-22. REFERENCE PWD ST. 3, PAGE 15: PLEASE PROVIDE A LIST OF ALL
“GRANT OPPORTUNITIES” WHICH PWD IS “ACTIVELY PURSUING” TO
HELP OFFSET THE COSTS OF LEAD SERVICE LINE REPLACEMENT.
SEPARATELY PROVIDE:
A. A LIST OF THE GEOGRAPHIC LOCATION OF ALL SERVICE LINE
REPLACEMENT GRANT OPPORTUNITY BEING “ACTIVELY PURSUED”;
B. A COPY OF EACH GRANT APPLICATION BEING “ACTIVELY
PURSUED.”
C. A COPY OF EACH NOTICE OF THE AVAILABILITY OF FUNDING
FROM WHICH ONE OR MORE GRANTS ARE BEING “ACTIVELY
PURSUED.”

RESPONSE:

Please see Section 7 of the Quarterly Reports filed with the Philadelphia Water, Sewer and Storm Water Rate Board (“Rate Board”). The table presented in Section 7 identifies the assistance program and amount of funding support received. The Water Department continues to pursue various state and federal funding opportunities.

In addition, please see Section 9 of the above referenced Quarterly Reports. PWD is evaluating future PENNVEST loan opportunities and will continue to pursue low-interest financing options and grants (where available) to support the CIP.

Please also see page FSP-33 of Statement 2A Schedule FP-1 for a listing of State and Federal assistance.

RESPONSE PROVIDED BY: Philadelphia Water Department

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 trying to resolve the pending discovery dispute.

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

Please 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

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:

Please refer to response attachment PA-VII-24.

RESPONSE PROVIDED BY: Philadelphia Water Department

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.

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11 **RESPONSE:**

12 The last three capital budgets that were submitted to the City Planning Commission are
13 available here:

14
15 [Capital Program and Budget | Philadelphia City Planning Commission | City of](#)
16 [Philadelphia](#)

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18 Cost for each capital project line, and funding source is provided in the documentation.

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20 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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PA-VII-26. 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 THROUGH 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:

- LSLR through Water Main Replacements:
 - 2022: 200
 - 2023: 173
 - 2024: 989
- HELP:
 - 2022: 49
 - 2023: 29
 - 2024: 38

RESPONSE PROVIDED BY: Philadelphia Water Department

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 is 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

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:

Service line inventory information is available online at <https://water.phila.gov/service-line/>. Information is regularly updated.

As of 3/15/2025:

- 15,297 Lead
- 1,623 Galvanized Requiring Replacement
- 92,208 Non-lead
- 417,238 Unknown

RESPONSE PROVIDED BY: Philadelphia Water Department

PA-VII-29. REFERENCE PWD ST. 4B, PAGE 8: PLEASE PROVIDE THE ANNUAL BUDGET FOR FY2026, FY2027 AND FY2028 FOR SERVICE LINE REPLACEMENTS, ASSUMING:

A. 2,000 SERVICE LINE REPLACEMENTS PER YEAR;

B. 2,500 SERVICE LINE REPLACEMENTS PER YEAR.

RESPONSE:

The Department has objected to this information request to the extent it seeks information beyond the Rate Period (FY 2028). 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:

The Water Department has proposed a capital budget of \$25 million in FY26 and \$24 million in FY27. It is anticipated that this funding could be used to replace up to 2,500 lead service lines. Some services require replacement of the full service line while others only require partial replacement so the price per service will vary. It is important to note that all lead service lines are privately owned and replacement is ultimately the responsibility of the homeowner.

RESPONSE PROVIDED BY: Philadelphia Water Department

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.

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9 **RESPONSE:**

10 Budget for lead service line replacement is included in overall appropriations which will
11 be expended over a number of years.

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13 Lead 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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PA-VII-31. REFERENCE PWD ST. 4B, AT 8: PLEASE PROVIDE A LIST OF ALL
“PROCESSES” THAT PWD IS “WORKING ON” TO INCREASE THE RATE
OF REPLACEMENT OF LEAD SERVICE LINES.

RESPONSE:

- PWD already replaces lead service lines that are encountered during water main replacement projects and allows for HELP loan coverage for customers interested in proactively replacing their lead service line.
- PWD is currently working on two pilot projects that would provide proactive replacement of lead service lines independent of water main replacement.
- As all lead service lines are privately owned, PWD requires authorization from the property owner to perform replacements. PWD is currently working to make the required Right of Entry form more accessible by placing it online and allowing for electronic signatures.
- PWD will actively engage in a public education campaign to inform and raise awareness among the community. This campaign will focus on the risks associated with lead exposure, the importance of service line replacement, and individual actions that can be taken to minimize exposure. By empowering the public with knowledge, PWD can facilitate informed decision-making and encourage active participation in the program.

RESPONSE PROVIDED BY: Philadelphia Water Department

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

PA-VII-33. REFERENCE PWD 4B, PAGE 14: SEPARATELY PROVIDE ALL
SUBMISSIONS TO THE PLANNING COMMISSION AND/OR BUDGET
OFFICE FOR THE PROJECTS LISTED IN THE IMMEDIATELY PRECEDING
REQUEST.

RESPONSE:

Please see response to PA-VII-25.

RESPONSE PROVIDED BY: Philadelphia Water Department

PA-VII-34. REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE
REPLACEMENT APPLICATION: PLEASE PROVIDE A COPY OF PWD'S
OCTOBER 24, 2024 LEAD SERVICE LINE INVENTORY.

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:

Please see response to PA-VII-28.

RESPONSE PROVIDED BY: Philadelphia Water Department

PA-VII-35. REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE
REPLACEMENT APPLICATION: PLEASE PROVIDE THE BASIS FOR
ESTIMATING THAT THERE ARE 20,000 LEAD SERVICE LINES IN NEED
OF REPLACEMENT.

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:

The estimate of 20,000 lead service lines covers the entire City, not just West Philadelphia. Estimates are approximately 5% of the 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.

RESPONSE PROVIDED BY: Philadelphia Water Department

1 **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
6 COST ESTIMATES.

7
8 **RESPONSE:**

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

11
12 Notwithstanding PWD objections and without waiver thereof, the Department responds to
13 this discovery request as follows:

14
15 The estimated cost of \$232 million to \$387 million is based on replacement of services
16 throughout the City, not just West Philadelphia. The high and low estimates are based on a
17 combination of the range of estimated service lines requiring replacement, the range of
18 expected cost based on a full or partial replacement, and anticipated project management
19 fees. Individual replacement costs will vary dependent upon project award. This estimate
20 should be expected to be updated as the program progresses.

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22 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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PA-VII-37. REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE
REPLACEMENT APPLICATION: PLEASE PROVIDE A COST ESTIMATE
FOR REPLACING LEAD SERVICE LINES GIVEN A REASONABLE
ESTIMATE OF THE PROPORTION OF LINES WITH CURRENTLY
“UNKNOWN” COMPOSITION THAT WOULD NEED TO BE REPLACED.
PROVIDE THE BASIS FOR THE COST ESTIMATE(S).

RESPONSE:

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

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 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 Water Department has not historically designated lead service line replacement cost in our capital budgets. In previous years, any lead service line replacement was a conducted through our water main replacement program. Moving forward, PWD is budgeting for \$25 million, and \$24 million in FY26 and FY27 for dedicated lead service line replacement.

RESPONSE PROVIDED BY: Philadelphia Water Department

PA-VII-39. REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE
REPLACEMENT APPLICATION: PLEASE IDENTIFY AND PROVIDE MAPS
OF THE “HISTORICALLY UNDERSERVED AREAS” REFERENCED IN
THIS APPLICATION. SEPARATELY DEFINE WHAT CONSTITUTES A
“HISTORICALLY UNDERSERVED AREA.”

RESPONSE:

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:

PWD utilized the following map for underserved data:

PennEnviroScreen (<https://gis.dep.pa.gov/PennEnviroScreen/>) maps.

The following website includes the requested definition and associated screening
tool:

<https://www.pa.gov/agencies/dep/public-participation/office-of-environmental-justice/pa-environmental-justice-areas.html#:~:text=For%20the%20purposes%20of%20the,or%20more%20of%20the%20population>

RESPONSE PROVIDED BY: Philadelphia Water Department

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).

7
8 **RESPONSE:**

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

11
12 Notwithstanding PWD objections and without waiver thereof, the Department responds to
13 this discovery request as follows:

14
15 Lead line 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 PWD is able to complete.

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19 **RESPONSE PROVIDED BY:** Philadelphia Water Department
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PA-VII-41. PLEASE IDENTIFY THE SPECIFIC APPROPRIATION OR SOURCE OF
PROGRAM FUNDING FOR PENNVEST DOLLARS FOR WHICH PWD HAS
APPLIED FOR FUNDING.

RESPONSE:

PENNVEST is funded via the U.S. Environmental Protection Agency.

RESPONSE PROVIDED BY: Philadelphia Water Department

PA-VII-42. REFERENCE: WEST PHILADELPHIA LEAD SERVICE LINE
REPLACEMENT APPLICATION: PLEASE EXPLAIN HOW LEAD SERVICE
LINE REPLACEMENTS WILL IMPROVE THE SITUATION FOR RENTERS.

RESPONSE:

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:

- Replacement of a residential lead service line reduces the risk of lead exposure for both renters and homeowners alike.

RESPONSE PROVIDED BY: Philadelphia Water Department

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:

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

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:

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

PA-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 BE 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.

RESPONSE:

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:

- 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.

RESPONSE PROVIDED BY: Philadelphia Water Department