#### PHILADELPHIA WATER DEPARTMENT PA INTERROGATORY SET #XIV

### **RESPONSE TO**

### PUBLIC ADVOCATE'S INTERROGATORIES

### AND

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

### **QUESTIONS 1-42**

Dated: April 2025

# PA-XIV-1.REFER TO PAGE 24. PLEASE EXPLAIN WHAT "VOLUME PER ACCOUNT<br/>ROUNDING FACTOR" MEANS AND HOW IT AFFECTS THE AMOUNTS<br/>PRESENTED IN THIS TAB.

### **RESPONSE:**

As the question references the "TAB" we assume this question is also referring to the active FINPLAN model provided in response to PA-I-2.

The rounding factor is applied to all Volume per Account figures, so that all of the figures have two significant digits. The rounding factor is used in the Volume per Account calculations as presented on the "Customer" tab within the model. The application of the "volume per account rounding factor" can be seen in the active FINPLAN model by tracing dependent formulas from the "Assumptions#" tab to the "Customer" tab.

The same information is provided in PDF format in PWD Exhibit 6. The Water Billed Volume per Account calculations are presented in Customer-4 on Page 115 and the Sewer Billed Volume per Account calculations presented in Customer-13 on page 133.

**RESPONSE PROVIDED BY:** 

Black &Veatch Management Consulting, LLC

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory	
1	<b>PA-XIV-2.</b> REFER TO PAGE 25. PLEASE PROVIDE THE SUPPORTING	
2	DOCUMENTATION FOR THE 2% INTEREST INCOME RATE.	
3		
4	RESPONSE:	
5	Please see response to PA-IX-9.	
6		
7	The interest rate assumption is based upon a review of the overall performance of	
8	individual funds and their associated earnings. Funds include interest and investment	
9	related earnings.	
10		
11	The assumed interest rate is intended to capture overall performance of funds includir	g
12	simple interest earnings and market-based performance over prior years.	
13 14	DESDONSE DDOVIDED DV. Dlask & Vestal Management Consulting LLC	
14	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC	
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	Public Interrogatory Set #XIV - 2	
	r uone interiogatory Set #AIV - 2	

1	PA-XIV-3.	REFER TO PAGE 25. PLEASE PROVIDE THE SUPPORTING
2		DOCUMENTATION FOR THE DEBT SERVICE RESERVE BALANCE OF
3		\$242,233,678. IN YOUR RESPONSE, PLEASE INDICATE WHETHER THIS IS
4		THE BALANCE AS OF A PARTICULAR DATE OR AN AVERAGE
5		AMOUNT. IN RESPONSE, PLEASE INDICATE THE DATE OF THE
6		BALANCE, OR PROVIDE THE MONTHLY AMOUNTS USED TO DERIVE
7		THE AVERAGE BALANCE.
8		
9	RESPONSE	:
10	The d	ebt service reserve balance is the end of FY 2024 (i.e., June 30, 2024) preliminary
11	actual	based on the Departments accounting records as of November 13, 2024.
12		
13	Please	e see response attachment PA-XIV-3 Line 11.
14		
15	RESPONSE	<b>PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
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		Public Interrogatory Set #XIV - 3

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-4.</b> REFER TO THE FOLLOWING LINE ITEMS ON PAGE 25:
2	MISC CITY REVENUES
3	• OTHER
4	STATE & FEDERAL GRANTS
5	PERMITS ISSUED BY L&I
6	MISCELLANEOUS (EMPLOYEE BENEFIT + PROC X
7	CITY & UESF GRANTS
8	AFFORDABILITY PROGRAM DISCOUNT ADJUSTMENT
9	FOR THE RATE YEARS COLUMNS, PLEASE EXPLAIN WHY THE 2-YEAR
0	HISTORICAL AVERAGE WAS USED INSTEAD OF THE 3-YEAR OR 4-
1	YEAR AVERAGE.
2	
3	RESPONSE:
4	The 2-year average reflects current policies, practices and performance as it relates to
5	miscellaneous revenues overall. The same assumption was used in the prior rate
6	proceeding.
17	
18	Note – the affordability program discount is not utilized in the base rate analysis.
19	
20	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 4

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-5.</b> REFER TO THE FOLLOWING LINE ITEMS ON PAGE 25:
2	MISC CITY REVENUES
3	• OTHER
4	STATE & FEDERAL GRANTS
5	PERMITS ISSUED BY L&I
6	MISCELLANEOUS (EMPLOYEE BENEFIT + PROC X
7	CITY & UESF GRANTS
8	AFFORDABILITY PROGRAM DISCOUNT ADJUSTMENT
9	PLEASE PROVIDE THE SOURCE DOCUMENT FOR THE PERCENTAGES
10	PRESENTED FOR THE RATE YEARS.
11	
12	RESPONSE:
13	For the purposes of this response, we assume this question is referring to the allocation
14	percentages between the Water and Wastewater Systems for establishing net revenues
15	requirements. The respective allocations are based on the following:
16	• MISC CITY REVENUES – Allocated 1/3 to the water system and 2/3 to the
17	wastewater system consistent with historical experience and prior rate proceedings.
18	• OTHER – Allocated equally (50/50) to the water and wastewater systems consistent
19	with prior rate proceedings.
20	• STATE & FEDERAL GRANTS- Consistent with historical experience and prior cost
21	of service analyses, State and Federal Grants are not allocated to the wastewater
22	(sewer) system. The anticipated State and Federal Grants are water system related.
23	• PERMITS ISSUED BY L&I - Allocated equally (50/50) to water and wastewater
24	systems consistent with prior rate proceedings.
25	• MISCELLANEOUS (EMPLOYEE BENEFIT + PROC X - Allocated equally (50/50)
26	to water and wastewater consistent with prior rate proceedings.
27	• CITY & UESF GRANTS - Allocated 100.0% to wastewater service consistent with
28	the prior rate proceeding.

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	AFFORDABILITY PR	OGRAM DISCOUNT ADJUSTMENT –Based upon the
2		AP- Costs to the water and wastewater systems as stated in
3	PWD Rates and Charge	
4		
5	<b>RESPONSE PROVIDED BY:</b>	Black &Veatch Management Consulting, LLC
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	F	Public Interrogatory Set #XIV - 6

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
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1	<b>PA-XIV-6.</b> REFER TO PAGE 32. THE DERIVATION OF THE COLLECTION FACTORS1
2	INCLUDES A COLUMN LABELED "EXCLUDING FED FUNDS". WHAT
3	ARE FED FUNDS, AND WHY IS IT APPROPRIATE NOT TO USE THE
4	COLLECTION FACTORS THAT EXCLUDE THE FED FUNDS?
5 6	RESPONSE:
7	Page 32 of PWD Exhibit 6 does not present or use collection factors excluding federal
8	funds. Federal funds refer to LIHWAP grants and similar customer assistance. See, PWD
9	Statement 5 at page 10.
10	
11	For the purposes of this response, we have assumed that this question refers to the
12	"Assumptions#" tab (worksheet) of the active FINPLAN model files provided in response
13	to PA-I-2 and PLUG-I-1. The above worksheet does provide an input for collection
14	factors excluding federal funded assistance programs; however, this input is not utilized in
15	the rate filing.
16	
17	As noted in the response to question 12 of Statement 5, the Department has experienced
18	decreasing levels of federally funded assistance programs during FY 22 to FY 2024.
19	Utilizing the collection factors based on all bill payments including payments associated
20	with federally funded assistance programs is a potential risk to the Department revenues if
21	the assistance from these programs continue to decrease during the rate period.
22	
23	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 7

#### PA-XIV-7. REFER TO PAGES 33 AND 34. PLEASE EXPLAIN WHAT THE COMPRESSION FACTOR (THE SECTION IN YELLOW HIGHLIGHT AND 2 3 BLUE FONT) IS AND PROVIDE THE SUPPORTING CALCULATION FOR THESE VALUES. 4

### **RESPONSE:**

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The "Additional Revenue Compression Factor" is utilized for the development of projected additional revenues in years in which the proposed revenue increase is not put into effect for a full fiscal year. As discussed in PWD Statement 7, Schedule BV-2 on Page ES-12, "an effective increase date of September 1<sup>st</sup> for each fiscal year is assumed." By not implementing increases for a full fiscal year, during the first fiscal year of a revenue increase, billings and revenues are reduced and reflect about 97.81% of total combined revenues.

The Additional Revenue Compression Factor is utilized to address this circumstance.

The rationale, development and application of the Additional Revenue Compression Factor is consistent with the approach used in the prior rate proceedings.

Please refer to response attachment PA-VIII-47 for the supporting calculations of the monthly collection factor data. The monthly collection factor data for the Water Revenue Increase Compression Factor is the average Percent Collected (<=12 Months) for Non-Stormwater only billings. The monthly collection factor data for the Combined Water and Wastewater Revenue Increase Compression Factor is the average Percent Collected (<=12 Months) for total billings.

**RESPONSE PROVIDED BY:** 

Black &Veatch Management Consulting, LLC

28

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-XIV-8.	REFER TO PAGE 36.
2		A. PLEASE PROVIDE DOCUMENTATION SHOWING THE SOURCE OF
3		THE \$3,621,996 LUMP SUM PAYMENT FROM AQUA PA.
4		B. PLEASE CONFIRM THAT AQUA PA IS CHARGED A FIXED AMOUNT
5		ANNUALLY REGARDLESS OF USAGE VOLUME. IF THERE IS A
6		VARIABLE PORTION OF THE REVENUE FROM AQUA PA, PLEASE
7		SHOW HOW IT IS REFLECTED IN THE COST OF SERVICE.
8		C. PLEASE INDICATE:
9		I. IF AQUA PA'S SERVICE IS BASED ON A CONTRACTUAL
10		ARRANGEMENT;
11		II. WHEN THE ANNUAL LUMP SUM IS EXPECTED TO CHANGE; AND
12		III. WHAT THE NEW ANNUAL AMOUNT WILL BE.
13		D. PLEASE EXPLAIN HOW IT IS POSSIBLE FOR AQUA PA TO HAVE
14		EXACTLY THE SAME USAGE EACH YEAR.
15		
16	RESPONSE	:
17	A. Pl	ease see response attachment PA-XIV-1 which provides the current amendment to
18	A	qua PA's water service agreement including the FY 2025 water charges. Note that
19	th	e FY 2025 water charges are effective November 1, 2024, therefore the FY 2025
20	ra	tes projected charges for Aqua PA reflect the effective charges for the fiscal year by
21	re	flecting the mid-year implementation of the charges.
22		
23	B. D	enied. Water charges for this service include a commodity charge designed to
24	re	cover power and chemical costs (variable) and a fixed charge designed to recover
25	al	located capital costs and all other allocated operation and maintenance expenses,
26	ex	ccluding power and chemical costs. See, Schedule BV-2 at Section 3.1.4.4.
27		
28		

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	С.
2	I. Yes. Per City ordinance, Aqua PA's water service is based on a contractual
-3	arrangement. Please refer to Section 4.3.2 of Schedule BV-2 which states:
4	"The cost of service allocable to Aqua PA and the rates developed to recover
5	the allocated costs, reflect consideration of the contract demands for service as
6	set forth in the contract between Aqua PA and the City."
7	
8	II. The Aqua water service charges, including the annual lump sum, are typically
9	adjusted annually.
10	
11	III. The TY 2026 Aqua PA cost of service and calculated water charges are
12	presented on page 887 of PWD Exhibit 6. These calculations for both the FY
13	2026 and FY 2027 Aqua PA water charges are presented on the RETCOS
14	worksheet of the WCOS model files provided in response to PA-I-2 and
15	PLUG-I-1.
16	
17	D. Wholesale water revenues are projected using estimated billed water volume based on
18	the historical three-year average for Aqua. See PWD Statement 7 at page 13.
19	
20	Page 125 of PWD Exhibit 6 presents the FY 2020 to FY 2024 Aqua PA water usage.
21	This information is also available on the Customer sheet of the FINPLAN model files
22	provided in response to PA-I-2 and PLUG-I-1. Note that the usage has decreased from
23	82,249 Mcf in FY 2022 to 53,752 Mcf in FY 2024. As noted in response to item A,
24	Aqua's capacity has been reduced by the 2024 amendment.
25	
26	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
27	
28	

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-XIV-9.	REFER TO PAGE 38.
2		A. WHEN DOES THE NEW BENSALEM CONTRACT BECOME
3		EFFECTIVE?
4		B. PLEASE PROVIDE DOCUMENTATION SHOWING THE SOURCE OF
5		THE \$144,000 LUMP SUM PAYMENT FROM BENSALEM. IF THERE IS
6		A VARIABLE PORTION OF THE REVENUE FROM BENSALEM,
7		PLEASE SHOW HOW IT IS REFLECTED IN THE COST OF SERVICE.
8		C. IS 12% THE NEW MANAGEMENT FEE FOR BENSALEM? IF NOT,
9		PLEASE IDENTIFY THE NEW MANAGEMENT FEE AND SHOW HOW
10		IT IS REFLECTED IN THE COST OF SERVICE.
11		
12	RESPONSE	:
13	A. The B	ensalem contract became effective on November 1, 2023. Please see response
14	attach	ment PA-III-1 for the wastewater service agreement for Bucks County Water and
15	Sewer	Authority for Bensalem Township.
16		
17	B. Please	e refer to response attachment XIV-9 for the FY 2025 rates for wholesale service to
18	Bensa	lem Township. Note that the FY 2025 rates were implemented on November 1,
19	2024.	The effective rates in the model reflect the mid-year implementation of the rates.
20		
21	Please	e refer to the volume charge (\$/Mcf), suspended Solids charge (\$/1,000 lbs), and
22	BOD	charge (\$/1,000 lbs) presented on page 38 of PWD Exhibit 6 for the existing
23	effect	ive rates for wholesale wastewater service to Bensalem.
24		
25	C. Yes.	
26		
27	RESPONSE	<b>PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
28		
		Public Interrogatory Set #XIV - 11

Public Interrogatory Set #XIV - 11

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-XIV-10. REFER TO PAGE 44.
2	A. PLEASE PROVIDE THE SOURCE DOCUMENTS AND/OR SUPPORTING
3	CALCULATION FOR THE RATE YEARS AMOUNTS FOR EACH OF
4	THE O&M ESCALATION FACTORS PRESENTED ON THE PAGE.
5	
6	RESPONSE:
7	The basis for the O&M escalation factors as presented in the workpapers and utilized in
8	the active model, are explained in PWD Statement 7 in response to Question 16 beginning
9	at Page 22. The basis for the escalation factors utilized in the cost of service analysis is
10	further detailed in PWD Statement 7 Schedule BV-2 in Section 1.4.2.
11	
12	The basis for the Labor escalation factors is further explained and additional background
13	data provided in response to PA-IX-17.
14	
15	The basis for the Benefits, Pension, and Pension Obligations escalation factors is further
16	explained and additional background data provided in response to PA-IX-20.
17	
18	Escalation factors based upon Producer Price Indices (PPI) or Consumer Price Indices
19	(CPI) are provided in Appendix F of Schedule BV-2. This information is also provided in
20	the active model. Please also see prior responses to PA-XI-3, 5, and 6.
21	
22	The data for escalation factors based upon PWD experience are provided in Appendix E of
23	Schedule BV-2. This information is also provided in the active model.
24	
25	The basis for the Energy and Gas escalation factors is explained and additional
26	background data provided in response to PA-IX-21.
27	
28	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-XIV-11. REFER TO PAGES 55 TO 6, 2025 BUDGET DETAIL COLUMN. PLEASE
2	PROVIDE THE ACTUAL AMOUNTS INCURRED DURING FY 2022, 2023
3	AND 2024 FOR VARIOUS LINE ITEMS AS PRESENTED IN THIS SECTION.
4	
5	RESPONSE:
6	Actuals for the divisions on the pages referenced in this question are provided on Pages 53
7	and 54 at the class level. Detailed actuals are available in the Water Department's prior
8	year budgets, please refer to the:
9	
10	Financial reports   City Treasurer's Office   City of Philadelphia
11	
12	Please refer to Book 2, Department 28 for the respective budget years. Actuals are
13	provided for the most recently completed fiscal year, as such there is a two-year lag. For
14	Example, the FY 2025 budget presents the FY 2023 actuals.
15	
16	<b>RESPONSE PROVIDED BY:</b> Philadelphia Water Department and Black &Veatch
17	Management Consulting, LLC
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	Public Interrogatory Set #XIV - 13

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
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1	<b>PA-XIV-12.</b> REFER TO PAGES 62 TO 63. PLEASE PROVIDE THE SUPPORT FOR
2	ALLOCATION PERCENTAGES UNDER THE 2025 BUDGET DETAIL
3	COLUMN.
4 5	RESPONSE:
6	Please refer to response attachment PA-XIV-12.
7	r lease teter to response attachment r A-XIV-12.
8	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 14

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-13.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR CONSTRUCTION AND ENGINEERING-SALARIES
3	AND WAGES PRESENTED ON PAGE 290.
4	
5	RESPONSE:
6	As presented in PWD Statement 7 Schedule BV-2 Section 1.4.3. This adjustment
7	represents the shift in staffing from the Capital to the Operating Budget. See Schedule
8	BV-1 Table C-7 Line 1, which shows the shifting of staff from the Capital Budget.
9	
10	As discussed in Section 1.4.3 of Schedule BV-2, the adjustment reflects the application of
11	actual to budget factors and the application of the corresponding escalation factor, as it
12	relates to the cost category.
13	
14	Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled
15	"OM Adj 2."
16	
17	The adjustment input in the model presents the cumulative costs on a fiscal year basis.
18	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
19 20	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 15

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-XIV-14. PLEASE EXPLAIN THE SHARP INCREASE IN CONSTRUCTION AND
2	ENGINEERING-SALARIES AND WAGES PRESENTED ON PAGE 290
3	FROM FY 2026 TO FY 2027.
4	
5	RESPONSE:
6	As discussed in Section 1.4.3 of Schedule BV-2, the adjustment reflects the shift in staff
7	from the Capital Budget to the Operating Budget. The increase is due to the continued
8	shift of staffing.
9	
10	The adjustment input in the model presents the cumulative impacts on a fiscal year basis.
11	
12	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 16

PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
<b>PA-XIV-15.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
YEARS AMOUNTS FOR OPERATIONS-SALARIES AND WAGES
PRESENTED ON PAGE 294.
RESPONSE:
Please note that Page 294 of Exhibit 6 does not contain salaries and wages adjustments, it
presents increases in contracted services for the Operations Division.
For the purposes of this response, we have assumed the question refers to the contracted
services costs presented on Page 294.
As described in PWD Statement 7 Schedule BV-2 Section 1.4.3, this adjustment includes
additional budgeted services for the Operations Division, adjusted for actual to budget
factors and escalation factors as applicable.
Place see PA VIV 12 for additional supporting calculations. Pafer to the tab entitled
Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled "OM Adj 3."
<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
Public Interrogatory Set #XIV - 17

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-16.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR PLANNING & ENVIRONMENTAL SERVICES-
3	SALARIES AND WAGES PRESENTED ON PAGE 294.
4	
5	RESPONSE:
6	Please note that Page 294 of Exhibit 6 does not contain salaries and wages adjustments, it
7	presents increases in contracted services for the Planning & Engineering Services
8	Division.
9	
10	For the purposes of this response, we have assumed the question refers to the service costs
11	presented on Page 294.
12	As described in DWD Statement 7 Schedule DV 2 Section 142 this edinaturent includes
13 14	As described in PWD Statement 7 Schedule BV-2 Section 1.4.3, this adjustment includes
14	additional budgeted services for the Planning & Engineering Services Division, adjusted for actual to budget factors and escalation factors as applicable.
15	for actual to budget factors and escalation factors as applicable.
17	Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled
18	"OM Adj 3."
19	
20	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 18

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-17.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
1 2	YEARS AMOUNTS FOR OPERATIONS-EQUIPMENT ON PAGE 297.
2	TEAKS AMOUNTS FOR OF ERATIONS-EQUITMENT ON FAGE 297.
4	RESPONSE:
5	As described in PWD Statement 7 Schedule BV-2 Section 1.4.3, this adjustment includes
6	additional budgeted equipment for the Operations Division, adjusted for actual to budget
7	factors and escalation factors as applicable.
8	
9	Please see response attachment PA-XIV-13 for additional supporting calculations. Refer
10	to the tab entitled "OM Adj 4."
11	
12	Please also refer to further background information and attachments provided in response
13	to PA-XI-4.
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15	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 19

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-18.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR HUMAN RESOURCES AND ADMINISTRATION-
3	SALARIES & WAGES ON PAGE 305.
4	
5	RESPONSE:
6	The adjustments presented on Page 305 of Exhibit 6 and as included in the active model,
7	shows the application of the labor agreements for each respective division.
8	
9	Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled
10	"OM Adj 7."
11	
12	This adjustment is described in PWD Statement 7 Schedule BV-2 Section 1.4.3, reflects
13	the application of the labor agreement, including bonuses only applicable in FY 2025,
14 15	adjusted for actual to budget factors and escalation factors as applicable.
16	Information regarding the labor agreements and associated adjustments was previously
17	provided in responses and related attachments to PA-IX-17 and PA-IX-18. Please also see
18	the response to PA-XIV-10.
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20	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 20

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	VIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	JNTS FOR FINANCE-SALARIES & WAGES ON PAGE 305.
3 4	
4 5	ative response and response attachment provided for PA-IX-17.
6	arve response and response attachment provided for 1 A-1X-17.
7	Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 21

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-20.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR CONSTRUCTION AND ENGINEERING-SALARIES
3	& WAGES ON PAGE 305.
4	
5	RESPONSE:
6	Please refer to the narrative response and response attachment provided for PA-IX-17.
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8	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 22

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-21.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR OPERATIONS-SALARIES & WAGES ON PAGE
3	306.
4	
5	RESPONSE:
6	Please refer to the narrative response and response attachment provided for PA-IX-17.
7	
8	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 23

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-22.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR PLANNING & ENVIRONMENTAL SERVICES-
3	SALARIES & WAGES ON PAGE 307.
4	
5	RESPONSE:
6	Page 307 of PWD Exhibit 6 does not present Planning & Environmental Services -Salaries
7	& Wages. This information is presented on page 306.
8	
9	Please refer to the narrative response and response attachment provided for PA-IX-17.
10	
11	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 24

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-23.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR PUBLIC AFFAIRS-SALARIES & WAGES ON PAGE
3	306.
4	
5	RESPONSE:
6	Page 306 of PWD Exhibit 6 does not present Public Affairs-Salaries & Wages. This
7	information is presented on page 307.
8	
9	Please refer to the narrative response and response attachment provided for PA-IX-17.
10	
11	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 25

## PA-XIV-24.PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE<br/>YEARS AMOUNTS FOR FINANCE-SALARIES & WAGES ON PAGE 308.

### **RESPONSE:**

The basis for the O&M adjustments as presented in the workpapers and utilized in the active model, are explained in PWD Statement 7 in response to Question 16. They are further described in PWD Statement 7 Schedule BV-2 Section 1.4.3. The adjustment referenced in the question includes additional staffing for the Finance Division, adjusted for actual to budget factors and escalation factors as applicable.

Please see response attachment PA-XIV-13 for additional supporting calculations. Refer to the tab entitled "OM Adj 8."

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-25.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR OPERATIONS-SALARIES & WAGES ON PAGE
3	309.
4	
5	RESPONSE:
6	The basis for the O&M adjustments as presented in the workpapers and utilized in the
7	active model, are explained in PWD Statement 7 in response to Question 16. They are
8	further described in PWD Statement 7 Schedule BV-2 Section 1.4.3. The adjustment
9	referenced in the question includes additional staffing for the Operations Division,
10	adjusted for actual to budget factors and escalation factors as applicable.
11	
12	Please see response attachment PA-XIV-13 for additional supporting calculations. Refer
13	to the tab entitled "OM Adj 8."
14	
15	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 27

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-26.</b> PLEASE EXPLAIN THE SHARP INCREASE IN OPERATIONS-SALARIES &
2	WAGES ON PAGE 309 FROM FY 2026 TO FY 2027.
3	
4	RESPONSE:
5	Please see response attachment PA-XIV-13. Refer to the tab entitled "OM Adj 8."
6	
7	The increase in operations salaries reflects a phase in of additional employees as well as
8	the application of applicable escalation factors related to salary costs. PWD anticipates
9	35% of the salary costs associated with the 45 new positions to be added in FY 2026 will
10	be incurred and the remaining 65% to be phased in FY 2027, reflecting the anticipated
11	hiring timelines.
12	DESDONSE DDOVIDED DV. Diasta % Vestate Management Committing LLC
13 14	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 28

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory	
1	<b>PA-XIV-27.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE	
2	YEARS AMOUNTS FOR PLANNING & ENVIRONMENTAL SERVICES-	
3	SALARIES & WAGES ON PAGE 309.	
4		
5	RESPONSE:	
6	The basis for the O&M adjustments as presented in the workpapers and utilized in the	
7	active model, is explained in PWD Statement 7 in response to Question 16. They are	
8	further described in PWD Statement 7 Schedule BV-2 Section 1.4.3. The adjustment	
9	referenced in the question includes additional staffing for the Planning & Engineering	
10	Division, adjusted for actual to budget factors and escalation factors as applicable.	
11		
12	Please see response attachment PA-XIV-13 for additional supporting calculations. Refer	
13	to the tab entitled "OM Adj 8."	
14		
15	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC	
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	Public Interrogatory Set #XIV - 29	

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-XIV-28. PLEASE EXPLAIN THE SHARP INCREASE IN PLANNING &
2	ENVIRONMENTAL SERVICES-SALARIES & WAGES ON PAGE 309 FROM
3	FY 2026 TO FY 2027.
4	
5	RESPONSE:
6	Please see response attachment PA-XIV-13. Refer to the tab entitled "OM Adj 8."
7	
8	The increase in operations salaries reflects a phase in of additional employees as well as
9	the application of applicable escalation factors related to salary costs. PWD anticipates
10	35% of the salary costs associated with the 45 new positions to be added in FY 2026 will
11	be incurred and the remaining 65% to be phased in FY 2027, reflecting the anticipated
12	hiring timelines.
13	
14	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 30

### **PA-XIV-29.**PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE<br/>YEARS AMOUNTS FOR TRANSFERS ON PAGE 311.

### **RESPONSE:**

The basis for the O&M adjustments as presented in the workpapers and utilized in the active model, are explained in PWD Statement 7 in response to Question 16. They are further described in PWD Statement 7 Schedule BV-2 Section 1.4.3. The adjustment referenced in the question includes transfer related to interdepartmental expenses, adjusted for actual to budget factors and escalation factors as applicable. Note the increase in transfer is related to increased salary costs per the City's labor agreement(s).

Please see response attachment PA-XIV-13 for additional supporting calculations. Refer to the tab entitled "OM Adj 9."

### **PA-XIV-30.**PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE<br/>YEARS AMOUNTS FOR SERVICES ON PAGE 330.

### **RESPONSE:**

The basis for the O&M adjustments as presented in the workpapers and utilized in the active model, are explained in PWD Statement 7 in response to Question 16. They are further described in PWD Statement 7 Schedule BV-2 Section 1.4.3. The adjustment referenced in the question includes planned additional contracted services including software licensing and web services. The adjustments reflect the application of actual to budget factors and applicable escalation factors.

Please see response attachment PA-XIV-13 for additional supporting calculations. Refer to the tab entitled "OM Adj 3."

# PA-XIV-31. PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE YEARS AMOUNTS FOR FLEET MANAGEMENT-MATERIALS AND SUPPLIES ON PAGE 340.

### **RESPONSE:**

The basis for the O&M adjustments as presented in the workpapers and utilized in the active model, are explained in PWD Statement 7 in response to Question 16. They are further described in PWD Statement 7 Schedule BV-2 Section 1.4.3. The adjustment referenced in the question includes additional materials and supplies for fleet management. The adjustments reflect the application of actual to budget factors and applicable escalation factors.

Please see response attachment PA-XIV-13 for additional supporting calculations. Refer to the tab entitled "OM Adj 5."

Additional background information regarding this adjustment was provided in response to PA-XI-6. These additional expenses include the increased cost associated with changing the water fund vehicle's diesel fuel to renewable diesel fuel per City policy as well as increased costs experienced for vehicle parts and lubricant costs.

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory		
1	<b>PA-XIV-32.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE		
2	YEARS AMOUNTS FOR DIVISION OF TECHNOLOGY-SALARIES &		
3	WAGES PRESENTED ON PAGE 348.		
4			
5	RESPONSE:		
6	The adjustments presented on Page 348 of Exhibit 6 and as included in the active model,		
7	shows the application of the labor agreements for divisions providing services to the		
8	Department (i.e., Other Departments).		
9			
10	Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled		
11	"OM Adj 7."		
12			
13	This adjustment is described in PWD Statement 7 Schedule BV-2 Section 1.4.3, reflects		
14	the application of the labor agreement, including bonuses only applicable in FY 2025,		
15	adjusted for actual to budget factors and escalation factors as applicable.		
16			
17	Information regarding the labor agreements and associated adjustments was previously		
18	provided in responses and related attachments to PA-IX-17 and PA-IX-18. Please also see		
19 20	the response to PA-XIV-10.		
20 21	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC		
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	Public Interrogatory Set #XIV - 34		

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-33.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR MAYOR'S OFFICE OF TRANSPORTATION &
3	UTILITIES AND OFFICE OF SUSTAINABILITY-SALARIES & WAGES
4	PRESENTED ON PAGE 348.
5	
6	RESPONSE:
7	Please refer to the response to PA-XIV-32. and the response and response attachment
8	provided for PA-IX-17.
9	
10	Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled
11	"OM Adj 7."
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13 14	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 35

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-34.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR FLEET MANAGEMENT-SALARIES & WAGES
3	PRESENTED ON PAGE 349.
4	
5	RESPONSE:
6	Please refer to the response to PA-XIV-32. and the response and response attachment
7	provided for PA-IX-17.
8	
9	Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled
10	"OM Adj 7."
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12 13	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 36

		PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	    PA-XIV-35	PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2		YEARS AMOUNTS FOR REVENUE-SALARIES & WAGES PRESENTED ON
3		PAGE 350.
4		
5	<b>RESPONSE:</b>	
6	Please r	efer to the response to PA-XIV-32. and the response and response attachment
7	provideo	d for PA-IX-17.
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9	Please s	ee PA-XIV-13 for additional supporting calculations. Refer to the tab entitled
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	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-36.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR PROCUREMENT-SALARIES & WAGES
3	PRESENTED ON PAGE 351.
4	
5	RESPONSE:
6	Please refer to the response to PA-XIV-32. and the response and response attachment
7	provided for PA-IX-17.
8	
9	Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled
10	"OM Adj 7."
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12	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 38

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-37.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR LAW-SALARIES & WAGES PRESENTED ON
$\frac{2}{3}$	PAGE 351.
4	
5	RESPONSE:
6	Please refer to the response to PA-XIV-32. and the response and response attachment
7	provided for PA-IX-17.
8	
9	Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled
10	"OM Adj 7."
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	Public Interrogatory Set #XIV - 39

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-38.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR PHILADELPHIA WATER, SEWER AND
3	STORMWATER RATE BOARD-SALARIES & WAGES PRESENTED ON
4	PAGE 353.
5	
6	RESPONSE:
7	The basis for the O&M adjustments as presented in the workpapers and utilized in the
8	active model, are explained in PWD Statement 7 in response to Question 16. They are
9	further described in PWD Statement 7 Schedule BV-2 Section 1.4.3. The adjustment
10	referenced in the question includes additional staffing for the Rate Board. The adjustments
11	reflect the application of actual to budget factors and applicable escalation factors.
12	
13	Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled
14	"OM Adj 8."
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16	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 40

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	<b>PA-XIV-39.</b> PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE
2	YEARS AMOUNTS FOR CITY FINANCE-SALARIES & WAGES
3	PRESENTED ON PAGE 355.
4	
5	RESPONSE:
6	The basis for the O&M adjustments as presented in the workpapers and utilized in the
7	active model, are explained in PWD Statement 7 in response to Question 16. They are
8	further described in PWD Statement 7 Schedule BV-2 Section 1.4.3. The adjustment
9	referenced in the question includes additional staffing for the City Finance Department,
10	which provides support to the Water Department. The adjustments reflect the application
11	of actual to budget factors and applicable escalation factors.
12	
13	Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled
14	"OM Adj 8."
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16	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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	Public Interrogatory Set #XIV - 41

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory	
1	<b>PA-XIV-40.</b> PLEASE EXPLAIN THE SHARP INCREASE IN CITY FINANCE-SALARIES	,
2	& WAGES PRESENTED ON PAGE 355 BETWEEN FY 2026 AND FY 2027.	
3		
4	RESPONSE:	
5	As discussed in response to PA-XIV_28, the increase in salaries reflects a phase in of	
6	additional employees as well as the application of applicable escalation factors related to	
7	salary costs. PWD anticipates 35% of the salary costs will be incurred in FY 2026 and the	
8	remaining 65% will be phased in FY 2027, reflecting the anticipated hiring timelines.	
9		
10	<b>RESPONSE PROVIDED BY:</b> Black & Veatch Management Consulting, LLC	
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	Public Interrogatory Set #XIV - 42	

## PA-XIV-41. PLEASE PROVIDE THE SUPPORTING DOCUMENTATION FOR THE RATE YEARS AMOUNTS FOR REVENUE-SALARIES & WAGES PRESENTED ON PAGE 355.

### **RESPONSE:**

The basis for the O&M adjustments as presented in the workpapers and utilized in the active model, are explained in PWD Statement 7 in response to Question 16. They are further described in PWD Statement 7 Schedule BV-2 Section 1.4.3. The adjustment referenced in the question includes additional staffing for the Revenue Department, which provides support to the Water Department. The adjustments reflect the application of actual to budget factors and applicable escalation factors.

Please see PA-XIV-13 for additional supporting calculations. Refer to the tab entitled "OM Adj 8."

**RESPONSE PROVIDED BY:** Black &Ve

Black &Veatch Management Consulting, LLC

	PHILADELPHIA WATER DEPARTMENT Response to PA Interrogatory
1	PA-XIV-42. PLEASE EXPLAIN THE SHARP INCREASE IN REVENUE-SALARIES &
2	WAGES PRESENTED ON PAGE 355 BETWEEN FY 2026 AND FY 2027.
3	
4	RESPONSE:
5	Please see response to PA-XIV-40. The in salaries reflects a phase in of additional
6	employees as well as the application of applicable escalation factors related to salary costs.
7	PWD anticipates 35% of the salary costs will be incurred in FY 2026 and the remaining
8	65% will be phased in FY 2027, reflecting the anticipated hiring timelines.
9	
10	<b>RESPONSE PROVIDED BY:</b> Black &Veatch Management Consulting, LLC
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