BEFORE THE PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

In the Matter of the Philadelphia Water :

Department's Proposed Changes in Water, : FY 2026 to FY 2027

Sewer and Stormwater Rates and Related :

Charges :

Philadelphia Large Users Group's ("PLUG")
Set II Interrogatories & Requests for Production of Documents
To the Philadelphia Water Department ("PWD")

Pursuant to the Regulations of the Philadelphia Water, Sewer, and Storm Water Rate Board for this rate proceeding, the Philadelphia Large Users Group's ("PLUG") requests that the Philadelphia Water Department ("PWD") provide full and complete answers to the following interrogatories.

Instructions and Definitions

- 1. Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession and control or custody of the Public Advocate or its consultants.
- 2. Each answer shall restate the question and identify the name and affiliation of the individual answering the interrogatory.
 - 3. Copies of all answers shall be provided in PDF and/or XLS format via email.

Interrogatories

- PLUG-PWD II-1 Does PWD employ a large account customer service representative?
- PLUG-PWD II-2 Identify the department and senior personnel at PWD responsible for customer service requests.
- PLUG-PWD II-3 For the department and personnel identified in response to PLUG-PWD-2, provide phone and email contact information.
- PLUG-PWD II-4 How does PWD evaluate its performance in responding and resolving customer service complaints or concerns?

Respectfully submitted,

McNEES WALLACE & NURICK LLC

By

Adeolu A. Bakare (I.D. No. 208541)

100 Pine Street

Harrisburg, PA 17101 Phone: (717) 232-8000 abakare@mcneeslaw.com

Counsel to Philadelphia Large Users Group

Dated: April 24, 2025