

BEFORE THE
PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater and Stormwater Rates and Charges	Fiscal Years 2026-2027
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**PHILADELPHIA WATER DEPARTMENT'S
INFORMATION REQUESTS TO THE
PUBLIC ADVOCATE, SET I**

The Philadelphia Water Department ("Department" or "PWD") requests that the Public Advocate provide full and complete answers to the following information requests (interrogatories and request for production of documents) upon the undersigned with seven calendar days of the service hereof.

Information Requests

Public Advocate Statement 2 (Mierzwa):

1. Is Mr. Mierzwa aware of the case of *Borough of W. Chester v. Pennsylvania State Sys. of Higher Education* currently pending before the Pennsylvania Supreme Court?
2. Has Mr. Mierzwa worked on a billing system replacement and/or updates to account and data management systems as an employee of a utility and/or as a vendor/consultant engaged directly by the utility in supporting such an effort?
 - (a) If so, please provide the name of each utility, location, population served, the services provided by the utility, the billing system, the accounting system, etc.
 - (b) Also, please describe the source of billing determinants, the frequency of billing, and the Departments/Divisions engaged in the billing system upgrade and replacement process.

3. Confirm or Deny: Discounts provided to senior citizens are recovered from all retail customer classes.
4. Confirm or Deny: Discounts associated with the Tiered Assistance Program are recovered from all retail customer classes.
5. Please provide the following information regarding the Township of Ferguson:
 - (a) What is the population of Ferguson?
 - (b) What is the stormwater service area for the Township of Ferguson?
 - (c) What is the breakdown of total residential and non-residential billing determinants? Please provide a total count of parcels and the associated billing units.
 - (d) Is the Township subject to a Consent Order Agreement with the Pennsylvania Department of Environmental Protection?
 - (e) What is the Annual Budget / Revenue Requirements associated with the Township of Ferguson's stormwater fee?
 - (f) Who provides Water Service to the Township of Ferguson?
 - (g) Who provides Wastewater Service to the Township of Ferguson?
6. On what basis does Mr. Mierzwa conclude that "residential rain barrels reduce the impact of heavy rainfall on PWD's stormwater conveyance system?"
 - (a) In your response, please clarify what Mr. Mierzwa defines [considers] "heavy rainfall."
7. Will a residential rain barrel drain without human intervention?
8. Can residential rain barrels be counted toward the Water Department's Greened Acre metrics under the requirements of the Consent Order Agreement and Long-Term Control Plan?
9. Confirm or Deny: Portions of the SMIP/GARP grants costs are also recovered from PWD Wholesale Customers.
10. With reference to Public Advocate Statement 2 at Page 28, Lines 10 to 12: Please explain how setting rates by averaging the stormwater rates with and without credits will result in the recovery of the associated revenue requirements when the actual billing units will reflect stormwater credits? In your response, please provide a proof of revenue calculation illustrating how your proposal would work.

11. Provide cost of service analysis calculations supporting the “Public Advocate Revised Class Cost of Service Study” presented in Table 1 (column 2) of Public Advocate Statement 2.

12. Provide proof of revenue analysis supporting the revenue distribution under the proposed rates presented in Table 3 (column 2) of Public Advocate Statement 2. Include detailed explanations of how these revenues by class were adjusted for the following:

- (a) Revenue for the billings under existing rates during the period of July 1, 2025 to September 1, 2025.
- (b) Revenue for the billings under proposed rates during the period of September 1, 2025 to June 30, 2026.
- (c) Revenues received during the period of July 1, 2025 to June 30, 2025 for payments associated with prior year billings.

13. If the revenue distribution under the proposed rates presented in Table 3 (column 2) of Public Advocate Statement 2 is not supported by a proof of revenue analysis, please provide the calculations supporting the revenue distribution. Include detailed explanations of how these revenues by class were adjusted for the following:

- (a) Revenue for the billings under existing rates during the period of July 1, 2025 to September 1, 2025.
- (b) Revenue for the billings under proposed rates during the period of September 1, 2025 to June 30, 2026.
- (c) Revenues received during the period of July 1, 2025 to June 30, 2025 for payments associated with prior year billings.

14. Reference Public Advocate Statement 2: Do you consider the revenue impacts under the Public Advocate proposed rates of 29.1% and 42.1% as gradual impacts?

15. Reference Public Advocate Statement 2: Did your decision to reflect the AMI demand study results in your cost of service analysis include an evaluation of the FY 2023 system maximum day demand and system maximum hour demand relative to the system peak of record?

16. Reference Public Advocate Statement 2: Please clarify your position regarding the FY 2027 cost of service. Are you suggesting the Department use an across the board rate adjustment relative to Public Advocate FY 2026 cost of service?

17. Reference Public Advocate Statement 2: Please clarify your position regarding the FY 2026 cost of service for PWD Wholesale Customers. Are you recommending that PWD Wholesale Customers be excluded from your approach to gradualism (50% phase-in).

18. Reference Public Advocate Statement 2: Please confirm if your intention is to accomplish a 50% phase-in of the impact associated with implementing the AMI Demand Study peaking factors in FY 2026. If so, please explain how your approach is more gradual than PWD's recommendation.

Respectfully submitted,

/s/ Andre C. Dasent

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Dated: May 1, 2025

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