

**BEFORE THE  
PHILADELPHIA WATER, SEWER AND STORMWATER RATE BOARD**

<b>In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater, and Stormwater Rates and Related Charges</b>	<b>:</b>	<b>Fiscal Years 2026 – 2027 Rates and Charges to Become Effective September 1, 2025 and September 1, 2026</b>
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**PUBLIC ADVOCATE'S RESPONSE TO PHILADELPHIA  
WATER DEPARTMENT'S DISCOVERY REQUESTS &  
REQUESTS FOR PRODUCTION OF DOCUMENTS  
SET II**

1. Please provide all workpapers associated with the preparation of Schedule LKM-1 in electronic format (formulas intact). Include all calculations supporting the derivation of the inputs used in Mr. Morgan's version of the Rate Board's "Simple Model."

Response

The requested information is attached as PA Response II-1 Attachments 1-4. Note that PA Response II-1 Attachment 3 is CONFIDENTIAL.

Responsible Witness:

Lafayette K. Morgan, Jr.