

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 VI**

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 in the immediate term.

Information Requests

Public Advocate Statement 1 — Schedule LKM-1 Eratta (Morgan):

1. Please immediately provide updated copies of the supporting workpapers which align with the updated version of Schedule LKM-1.
2. Please immediately provide narrative explaining the differences between the original version of Schedule LKM-1 and the revised version.
3. Please immediately provide a breakdown of the differences between the original version of Schedule LKM-1 with formulas intact.
4. Please provide a summary of all updates made to Schedule LKM-1.
5. Please explain why the original adjustment noted in the Advocate's response to PWD-IV-33 needed to be revised. Provide supporting calculations formulas intact.
6. Confirm or Deny: Mr. Morgan reviewed the full response to PA-IX-17.

7. Confirm or Deny: Mr. Morgan sought no further clarification regarding the response to PA-IX-17.
8. Confirm or Deny: Mr. Morgan is in receipt of the active financial plan model and the associated workpapers.
9. Please refer to PA-IX-17(F). Confirm or Deny: The response to the referenced discovery request states that the supporting workpapers show the two components of the FY 2025 labor agreement adjustment. Component (2) associated with the FY 2025 one-time bonuses adjusts the salary expenses in FY 2025 only which eliminates the need to remove it from FY 2026 and FY 2027.
10. Refer PWD Exhibit 6 at Pages 305 to 307. Confirm or Deny: The total amounts shown in the workpapers for FY 2025 are more than the total amounts shown for FY 2026 and FY 2027.
11. Please immediately provide Mr. Morgan's updated Simple Model including all related tables and supporting documents. Please also include any supporting workpapers used in the derivation of his analysis.

Respectfully submitted,

/s/ Andre Dasent

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Dated: May 15, 2025

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