

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

**In the Matter of the Philadelphia Water Department's Proposed Change in Water, Wastewater, and Stormwater Rates and Related Charges : Fiscal Years 2026 – 2027 Rates and Charges to Become Effective September 1, 2025 and September 1, 2026**

**PUBLIC ADVOCATE DISCOVERY REQUESTS  
&  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

**Set III**

- PA-III-1. For each of the Company's wholesale waste water customers, please provide copies of the provisions of each contract that identify the current rates and PWD's ability to adjust those rates. Also explain how PWD ensures that each wholesale customer's rates are sufficient to recover the costs associated with service to each customer.
- PA-III-2. Reference PWD Statement No. 7, page 12. Please provide a complete copy of the analysis supporting the development of Step 1: The Projections of Gross Billings in Excel format with all formulas intact.
- PA-III-3. Please identify the impact of stormwater credits on total residential, and non-residential GA and IA from those used to set rates in the two prior cases.
- PA-III-4. Please identify each stormwater credit GA and IA adjustment authorized for the last three years. Identify for each adjustment, the customer's GA and IA before the adjustment and after the adjustment.
- PA-III-5. Please explain in detail any changes in the water, wastewater, and stormwater cost allocation and rate design methodologies proposed by the PWD since the last proceeding with the exception of using maximum day and hour demand factors for each customer class based on the AMI Demand Study.
- PA-III-6. For each of the past five fiscal years, please provide for the water system:

- a. System average day production;
- b. System maximum day production; and
- c. System maximum hour production.

PA-III-7. Please provide a copy of PWD's most recent long-term water supply plan.

PA-III-8. Please provide an estimate of the quantity of water used for public firefighting for each of the last three years.

PA-III-9. Please identify the annual quantities of non-revenue water by type for the most recent three-year period available. Also, identify annual water production for the same five annual periods.

PA-III-10. Since its last case, has the PWD conducted a comprehensive holistic review of its rate structure for water service under which separate rate schedules were considered for certain customer classes? If no, why not? If yes, please describe this review in detail and present all results and findings of the review.

PA-III-11. Please provide an estimate of the revenue reductions resulting from stormwater credits for the last three fiscal years. Include supporting calculations.

PA-III-12. Please provide a copy of any studies performed by PWD that evaluate the extent to which the stormwater credit program has reduced stormwater volumes.

PA-III-13. What is the population of PWD's water service territory?

PA-III-14. In the wastewater cost of service study, please explain how the costs associated with I/I are allocated to each customer type.

PA-III-15. Please provide an estimate of the annual costs incurred by the PWD to manage and implement the stormwater management credit program by type, including costs for construction of facilities for FY 2022 – FY 2025. Separately identify amounts for which the PWD was directly responsible and amounts offset or funded by other sources.

- PA-III-16. Please identify the amounts included in the stormwater revenue requirement for Test Year 2026 for the stormwater management credit program by type, and indicate where those costs are included in the stormwater cost of service study. Separately identify amounts for which the PWD will be directly responsible and amounts offset or funded by other sources.
- PA-III-17. Please provide an estimate of the annual costs associated with the Green Acres Retrofit Program by type for FY 2023 – FY 2025. Separately identify amounts for which the PWD was directly responsible and amounts offset or funded by other sources.
- PA-III-18. Please identify the amounts included in the stormwater revenue requirement for Test Year 2026 for the Green Acres Retrofit Program by type, and indicate where those costs are included in the stormwater cost of service study. Separately identify amounts for which the PWD will be directly responsible and amounts offset or funded by other sources.
- PA-III-19. Please provide an estimate of the annual costs associated with Green City Clean Waters by type for FY 2023 – FY 2025. Separately identify amounts for which the PWD was directly responsible and amounts offset or funded by other sources.
- PA-III-20. Please identify the amounts included in the stormwater revenue requirement for Test Year 2026 for Green City Clean Waters by type, and indicate where those costs are included in the stormwater cost of service study. Separately identify amounts for which the PWD will be directly responsible and amounts offset or funded by other sources.
- PA-III-21. Please provide a comparison of revenues at present rates and at proposed rates for each rate class included in the cost of service studies for water, wastewater, and storm water service. Include the supporting calculations for proposed revenues in Excel format with all formulas intact.
- PA-III-22. Please describe each of the programs currently in place designed to reduce Residential storm water volumes. Identify the number of customers participating in each program and the estimated annual reduction in storm water volumes achieved under each

program. Also identify the annual costs associated with each program and explain how the program is funded.

PA-III-23. Please identify the following for FY 2025:

- a. Stormwater non-billing/collection cost of service;
- b. Gross area (GA) and impervious area (IA) billing determinants (500 sf.) used for rate design (inclusive of GA/IA credits); and
- c. The amount by which the GA and IA billing determinants identified in subpart (b) were reduced to reflect GA/IA credits.

PA-III-24. Reference PWD Statement 7, page 11 and PWD Statement 1, page 4, lines 1-6. Please explain why Statement 7 shows two different annual increases for FY 2026, none of which match the \$78.630 million identified in Statement 1, while no such difference between Statement 7 and Statement 1 exist for FY 2027.

PA-III-25. Reference PWD Statement 7, pages 56 and 57. Please provide the calculations supporting the typical increases in the combined monthly water, sanitary sewer, and stormwater bills in Excel format with all formulas intact.

PA-III-26. Reference Schedule BV-2, Table E5-4. Please provide the calculations supporting the typical bill impacts for each customer classification for each fiscal year in Excel format with all formulas intact.

PA-III-27. Please explain how TAP-R costs are reflected in PWD's water, sewer, and stormwater cost of service studies and recovered from customers.

PA-III-28. Reference Schedule BV-2, page 2-19. Please explain how groundwater usage is determined and how charges are assessed to customers.

PA-III-29. Reference Schedule BV-2, Tables 2-14 and 2-15, pages 2-20 and 2-22. Please provide the calculations supporting Table 2-14 and Table 2-15 in Excel format with all formulas intact.

- PA-III-30. Reference Schedule BV-4, Table ES-1, page 5, and page 10, first line. Are the average day volumes reflected in Table ES-1 averages for 365 days or 131 days?
- PA-III-31. Reference Schedule BV-4:WP-2, Table 2-4. Please provide the calculations supporting Table 2-4 in Excel format.
- PA-III-32. Reference Schedule BV-4:WP-2, Table 2-5. Please provide the calculations and cost of service studies supporting Table 2-5 in Excel format.
- PA-III-33. Reference the Rate Determination (“Order”) in PWD’s 2023 General Rate Proceeding issued June 21, 2023, pages 41-42. Page 41 of the Order identifies three proposals presented by PA witness Mierzwa concerning stormwater rates and credits. Please identify the progress PWD has made in evaluating those proposals, PWD’s position and proposed resolution for each proposal, and the time frame anticipated for the resolution.
- PA-III-34. Please explain the smallest increment in which PWD’s billing system is currently programmed to issue bills for residential water usage, i.e., CCFs, CFs, etc.