

**RESPONSE TO**  
**PUBLIC ADVOCATE'S INTERROGATORIES**  
**AND**  
**REQUESTS FOR PRODUCTION OF DOCUMENTS**  
**QUESTIONS 1-3**

**Dated: February 2025**

1 **PA-I-1.** PLEASE PROVIDE/FILE PWD EXHIBIT 6 (CURRENTLY DESIGNATED “TO  
2 BE PROVIDED”).

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4 **RESPONSE:**

5 The requested information can be accessed at the Dropbox website designated by the  
6 Philadelphia Water Department (PWD). PWD has also requested that this information be  
7 posted at the Water, Sewer and Storm Water Rate Board website and that it be marked as  
8 PWD Exhibit 6.

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10 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-I-2.** PLEASE PROVIDE BLACK & VEATCH’S COST OF SERVICE STUDY  
2 MODEL FILES (TYPICALLY DESIGNATED “FINPLAN,” “WCOS,” “SCOS”)  
3 INCLUDING ALL CALCULATIONS SUPPORTING THE FEBRUARY 2025  
4 ADVANCE NOTICE, IN MICROSOFT EXCEL FORMAT WITH ALL  
5 FORMULAE INTACT.

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7 **RESPONSE:**

8 The Microsoft Excel-based Computer Models utilized in the development of the cost of  
9 service study supporting PWD’s rate filing will be made available to Participants that  
10 execute a confidentially agreement.

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12 The Excel-based models, which include the Black & Veatch Management Consulting,  
13 LLC (Black & Veatch) Cost of Service Work Papers (PWD Exhibit 6), are as follows:

- 14 1. Financial Plan (Finplan25\_26\_ver1.xlsm)  
15 2. Wastewater Cost of Service (SCOS25\_26\_ver1.xls)  
16 3. Water Cost of Service (WCOS25\_26\_ver1.xls)

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18 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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1 **PA-I-3.** HAS PWD PREPARED PROJECTIONS (OR PRESENTATIONS) OF ITS  
2 PROPOSED REVENUE REQUIREMENTS FOR FUTURE RATE PERIODS ON  
3 A 12-MONTH BASIS (SEPTEMBER 1 THROUGH AUGUST 31), AS  
4 OPPOSED TO A 10-MONTH BASIS AS SHOWN IN SCHEDULE BV-1,  
5 TABLES C-1, C-1A AND C-1B? IF SO, PLEASE PROVIDE COPIES OF SUCH  
6 PROJECTIONS, IN MICROSOFT EXCEL FORMAT WITH ALL FORMULAE  
7 INTACT.

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9 **RESPONSE:**

10 The 12-month presentation of the annualized revenue requirements for Table C-1A is  
11 provided for Test Year 2026 in the Financial Plan on the tab entitled “BV\_E1\_C\_Tables,”  
12 Columns C through N, Lines 126 to 205.

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14 Annualized revenue requirements for Test Year 1 (FY 2026) for both the Water and  
15 Wastewater are presented in Table 4-1 and Table 7-1 on PWD Statement 7: Schedule  
16 BV-2: Water and Wastewater Cost of Service Report.

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18 Table C-1, Table C-1A and Table C-1B are shown on a Fiscal Year basis in order to show  
19 the overall projected financial performance of the Water Fund in alignment with the  
20 General Ordinance.

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22 **RESPONSE PROVIDED BY:** Black & Veatch Management Consulting, LLC  
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