

**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 ADVOCATES DISCOVERY REQUESTS  
&  
REQUESTS FOR PRODUCTION OF DOCUMENTS**

- PA-VII-1. Given that PWD staffperson Laura Copeland is a member of the Board of Directors of UESF, please provide PWD's understanding of each source of funding that UESF distributes as grants for Philadelphia water bills. Identify each source of funding for the most recently completed three Fiscal Years as well as the current Fiscal Year to date.
- PA-VII-2. Given that PWD staffperson Laura Copeland is a member of the Board of Directors of UESF, please provide PWD's understanding of the dollars of annual grant funding, or percentage of annual grant funding received by UESF from the City of Philadelphia for distribution as utility grants. Identify such funding for the most recently completed three Fiscal Years as well as the current Fiscal Year to date.
- PA-VII-3. Given that PWD staffperson Laura Copeland is a member of the Board of Directors of UESF, please provide PWD's understanding of what happens to funding that UESF has received in a Fiscal Year for utility grants, if said funding is not distributed.
- PA-VII-4. Given that PWD staffperson Laura Copeland is a member of the Board of Directors of UESF, please provide PWD's understanding of the amount of funds distributed by UESF by year for the three most recently completed Fiscal Years, as well as for the current fiscal year to date, to (a) the Philadelphia Water Department, (b) Philadelphia Gas Works, and (c) PECO Energy.
- PA-VII-5. Given that PWD staffperson Laura Copeland is a member of the Board of Directors of UESF, please provide PWD's understanding of the rules governing the distribution of USEF grants for utility assistance, identifying any differences between rules applicable to (a) the Philadelphia Water Department, (b) Philadelphia Gas Works, and (c) PECO Energy.

PA-VII-6. Given that PWD staffperson Laura Copeland is a member of the Board of Directors of UESF, please provide PWD's understanding of any internal or external restrictions on the percentage of grant funding received by UESF for utility assistance in a year that must, in turn, be distributed as utility assistance in that same year.

PA-VII-7. Given that PWD staffperson Laura Copeland is a member of the Board of Directors of UESF, please provide PWD's understanding of any agreement between UESF and the City of Philadelphia regarding:

- a. The dollar amount of city funding to be received by UESF on an annual basis; and
- b. The dollar amount of city funding to be distributed by UESF on an annual basis.

PA-VII-8. Given that PWD staffperson Laura Copeland is a member of the Board of Directors of UESF, please provide PWD's understanding of, and a copy of, any written agreement between the City of Philadelphia and UESF regarding the receipt by UESF and distribution by UESF of City funds for utility assistance.

PA-VII-9. Given that PWD staffperson Laura Copeland is a member of the Board of Directors of UESF, please provide PWD's understanding of whether the distribution of UESF dollars between PWD, PGW and PECO is solely within the discretion of UESF.

PA-VII-10. Reference PWD St. 5: Please provide:

- a. The dollars budgeted for "matching grants" for each Fiscal Year FY2025 – FY2027.
- b. Of the dollars budgeted for matching grants, the dollars proposed to be recovered through rates.

PA-VII-11. By month for FY2024 and FY2025 to date, please provide:

- a. The number of accounts receiving assistance through UESF;
- b. The dollars of assistance received through UESF;
- c. The number of accounts receiving assistance through PAHAF;
- d. The dollars of assistance received through PAHAF.

PA-VII-12. Reference PWD St. 5, page 10: Assuming an elimination, or a substantial reduction, in UESF grants received in FY2026 and FY2027, please provide a detailed explanation of the means, if any, by which PWD will replace those dollars for purposes of providing grants.

PA-VII-13. Reference PWD St. 5, page 10: Assuming an elimination, or a substantial reduction, in UESF grants received in FY2026 and FY2027, please provide a detailed explanation of whether the PWD grants now provided as "matching" grants will still

require a matching, or whether they will be provided, if at all, irrespective of the existence of matching funds.

PA-VII-14. Reference PWD St. 5: In FY26 and/or FY27, will PWD refuse to accept UESF grants, and/or refuse to match USEF grants, if these grants do not have the effect of reducing outstanding balances to \$0.

PA-VII-15. Reference PWD St. 5, page 10: Please explain how the rate relief requested in this proceeding will help to address the financial strain on income-eligible customers caused by the end of the specified programs (e.g., LIHWAP, PAHAF, PHDC).

PA-VII-16. Confirm or deny: The end of the water assistance programs for income-eligible customers, as specified by PWD (e.g., LIHWAP, PAHAF, PHDC) will increase the financial strain on income-eligible customers who had previously received financial assistance to help pay their PWD bills through these programs. If denied, please provide a detailed explanation of the basis for the denial.

PA-VII-17. Reference PWD St. 3, page 9: Please provide a map of the water main replacements that will be done through the \$1,008 million budget in:

- a. FY2026;
- b. FY2027;
- c. FY2028.

PA-VII-18. Reference PWD St. 3, page 9: Please provide a map of the failing sewer system components that will be replaced/repair through the \$990 million budget in:

- a. FY2026;
- b. FY2027;
- c. FY2028

PA-VII-19. Reference PWD St. 3, page 12: Please provide a map of the 32 miles of water main replacements per year for:

- a. FY2026;
- b. FY2027;
- c. FY2028.

PA-VII-20. Reference PWD St. 3, page 12 -13: Please provide a map of the water main breaks per year for the past five years underlying the calculation of a five-year average breaks per 100 miles of 24 breaks per year.

PA-VII-21. Reference PWD St. 3, page 14: Please provide maps of:

- a. The 13 miles of sewer replacement or rehabilitation in FY2025;
- b. The 14 miles of sewer replacement or rehabilitation in FY2026;
- c. The 15 miles of sewer replacement or rehabilitation in FY2027.

PA-VII-22. Reference PWD St. 3, page 15: Please provide a list of all “grant opportunities” which PWD is “actively pursuing” to help offset the costs of lead service line replacement. Separately provide:

- a. A list of the geographic location of all service line replacement grant opportunity being “actively pursued”;
- b. A copy of each grant application being “actively pursued.”
- c. A copy of each notice of the availability of funding from which one or more grants are being “actively pursued.”

PA-VII-23. Reference PWD St. 3, Schedule CP-1, page 265: Please provide all requests from the City Budget Office to PWD regarding new capital spending for quantitative and qualitative information about the impact of new funding on racial disparities.

- a. Separately provide all responses providing the requested quantitative and qualitative information about the impact of new funding on racial disparities.

PA-VII-24. Reference PWD St. 3, Schedule CP-1, page 266: Please provide all PWD responses to the following questions stated to have been posed to PWD in the city budgeting process:

- a. Please briefly describe how the core functions of your agency intersect with the City’s vision for racial equity. What major areas of opportunity are there for you to advance racial equity as part of the core work your department performs?
- b. What critical programs, initiatives, or policies does your office administer with your current budget to improve racial equity? In briefly describing this program, initiative, or policy, please include (a) how you measure its success (including any performance measures and/or data/tools available), (b) observable strengths in advancing racial equity, and (c) observable challenges or opportunities for growth in advancing racial equity.
- c. Is there any critical unmet need within your budget that inhibits your department’s achievement of its greatest racial equity priorities? If so, briefly describe.
- d. How have you involved internal and external stakeholders, including marginalized communities of color, in your department’s budget process?

Note that this question is not asking PWD to develop new responses to these questions. Rather, the Appendix to the Capital Panel testimony states that “Departments were then asked to respond to the following questions. . .” We are asking for PWD’s response to those questions.

PA-VII-25. Reference PWD St. 3, Schedule CP-1, page 270: Provide the most recent three Capital Programs prepared by the City Planning Commission and the Budget Office

presenting the capital expenditures for PWD for each of the six ensuing fiscal years, including:

- a. The estimated cost of each project; and
- b. The source of funding (local, Commonwealth, Federal and private) for each project estimated to be required to finance each project.

PA-VII-26. Reference PWD St. 4B, page 6: Please provide by year for the past three years the total number of residential lead service line replacements from the main through to the meter identifying (a) the number replaced through water main replacements, and (b) the number replaced through HELP loans.

PA-VII-27. Reference PWD St. 4B, page 6: Please provide by year for the past three years the total number of residential lead service line replacements from the main to the curb stop (but not from the curb stop to the meter) identifying (a) the number replaced through water main replacements, and (b) the number replaced through HELP loans.

PA-VII-28. Reference PWD St. 4B, pages 7 & 10: Please provide the current inventory of composition of service lines showing, in particular, the number of lead, galvanized, and unknown service lines.

PA-VII-29. Reference PWD St. 4B, page 8: Please provide the annual budget for FY2026, FY2027 and FY2028 for service line replacements, assuming:

- a. 2,000 service line replacements per year;
- b. 2,500 service line replacements per year.

PA-VII-30. Reference PWD St. 4B, page 8: Please provide a detailed explanation of how PWD will conform its budget spending for lead service line replacements to the dollars for lead service line replacements included in rates should the actual number of service line replacements be more or less than the number for which budgeted dollars are included in rates.

PA-VII-31. Reference PWD St. 4B, at 8: Please provide a list of all “processes” that PWD is “working on” to increase the rate of replacement of lead service lines.

PA-VII-32. Reference PWD St. 4B, page 14: Please provide a list of all projects associated with the initial preparation to meet PFAS MCLs planned for FY2026, FY2027, and FY2028.

- PA-VII-33. Reference PWD 4B, page 14: Separately provide all submissions to the Planning Commission and/or Budget Office for the projects listed in the immediately preceding request.
- PA-VII-34. Reference: West Philadelphia lead service line replacement application: Please provide a copy of PWD's October 24, 2024 Lead Service Line Inventory.
- PA-VII-35. Reference: West Philadelphia lead service line replacement application: Please provide the basis for estimating that there are 20,000 lead service lines in need of replacement.
- PA-VII-36. Reference: West Philadelphia lead service line replacement application: Please provide the basis for estimating the cost of \$232 million to \$382 million to replace known lead service lines. Separately explain the difference between the basis for the higher and lower cost estimates.
- PA-VII-37. Reference: West Philadelphia lead service line replacement application: Please provide a cost estimate for replacing lead service lines given a reasonable estimate of the proportion of lines with currently "unknown" composition that would need to be replaced. Provide the basis for the cost estimate(s).
- PA-VII-38. Reference: West Philadelphia lead service line replacement application: Please provide the most recent three submissions to the City Planning Commission and City Budget Office setting forth PWD's proposed six year capital plan for:
- a. Replacing known lead service lines in need of replacement;
  - b. Replacing estimated lead service lines in need of replacement.
- PA-VII-39. Reference: West Philadelphia lead service line replacement application: Please identify and provide maps of the "historically underserved areas" referenced in this application. Separately define what constitutes a "historically underserved area."
- PA-VII-40. Reference: West Philadelphia lead service line replacement application: Please identify and describe the extent to which Lead Service Line Replacement implementation is dependent upon PennVest SRF funds ("dependent" meaning that without which the replacements will not occur).
- PA-VII-41. Please identify the specific appropriation or source of program funding for PennVest dollars for which PWD has applied for funding.

PA-VII-42. Reference: West Philadelphia lead service line replacement application:  
Please explain how Lead Service Line Replacements will improve the situation for renters.

PA-VII-43. Reference: West Philadelphia lead service line replacement application:  
Please provide a detailed description of how PennVest grants and/or loans devoted to Lead Service Line Replacements will be accessed by individual households in Philadelphia.

PA-VII-44. Reference: West Philadelphia lead service line replacement application:  
Please provide a detailed description of the difference in the ways by which individual households will access Lead Service Line Replacement funds depending on whether they are renters or homeowners.

PA-VII-45. Application for project #512033182411, page 22 of 27: Please provide the basis for:

- a. The 2023 average annual residential bill of \$339;
- b. The estimate that 100% of residential bills levied will be collected in 2023;
- c. The 2029 average annual residential bill of \$521;
- d. The estimate that 100% of the residential bills levied will be collected in 2029.