BEFORE THE PHILADELPHIA WATER, SEWER AND STORM WATER RATE BOARD

In the Matter of the Philadelphia Water	:	
Department's Proposed Changes in Water,	:	FY 2026 to FY 2027
Sewer and Stormwater Rates and Related	:	FT 2020 to FT 2027
Charges	:	

Philadelphia Large Users Group's ("PLUG") Interrogatories & Requests for Production of Documents To the Philadelphia Water Department ("PWD")

Pursuant to the Regulations of the Philadelphia Water, Sewer, and Storm Water Rate Board for this rate proceeding, the Philadelphia Large Users Group's ("PLUG") requests that the Philadelphia Water Department ("PWD") provide full and complete answers to the following interrogatories.

Instructions and Definitions

1. Each interrogatory and request for production shall be answered fully and completely. All information is to be divulged that is within the knowledge, possession and control or custody of the Public Advocate or its consultants.

2. Each answer shall restate the question and identify the name and affiliation of the individual answering the interrogatory.

3. Copies of all answers shall be provided in PDF and/or XLS format via email.

Interrogatories

- PLUG-PWD-1 Provide the comprehensive cost of service study (COSS) presented by Black and Veatch Management Consulting ("BV") in Excel spreadsheet format with all cell formulas intact. This request includes all spreadsheets included in Schedules BV-1, BV-2, and BV-3. Include all supporting spreadsheet work papers used in the preparation of these schedules.
- PLUG-PWD-2 Provide all Excel spreadsheets and supporting work papers utilized in the preparation of Schedule BV-4. Provide working versions of all spreadsheets with cell formulas intact.
- PLUG-PWD-3 Regarding the work papers supplied in the PDF version of PWD Exhibit 6, provide all associated Excel spreadsheets with cell formulas intact.
- PLUG-PWD-4 Refer to Table 4-12, Schedule BV-2. Provide a proof of revenues showing revenues under existing water service rates and revenues under proposed water service rates for each of the customer types shown in Table 4-12. Provide a detailed presentation of the application of meter and water quantity charges for each class. Provide working Excel spreadsheets with cell formulas intact. Provide this analysis for both FY2026 and FY2027 for all customer types.

- PLUG-PWD-5 Refer to Table 7-27, Schedule BV-2. Provide a proof of revenues showing revenues under existing sewer service rates and revenues under proposed sewer service rates for each of the customer types shown in Table 7-27. Provide a detailed presentation of the application of sewer charges for each class. Provide working Excel spreadsheets with cell formulas intact. Provide this analysis for both FY2026 and FY2027 for all customer types.
- PLUG-PWD-6 Refer to Table 7-28, Schedule BV-2. Provide a proof of revenues showing revenues under existing stormwater service rates and revenues under proposed stormwater service rates for each of the customer types shown in Table 7-28. Provide a detailed presentation of the application of stormwater charges for each class. Provide working Excel spreadsheets with cell formulas intact. Provide this analysis for both FY2026 and FY2027 for all customer types.
- PLUG-PWD-7 a. Refer to Table 4-12, Schedule BV-2. Show the actual increases by customer type from the application of proposed water service rates. Provide detailed analyses showing the application of proposed meter and water quantity charges to billing determinants for each class. Show actual increases in dollar and percentage amounts by customer type.

Include the detailed billing determinants by customer type, showing the application of current and proposed rates to the meters and water usage tiers for each customer type.

Provide all spreadsheet analyses and work papers with cell formulas intact associated with the response.

- PLUG-PWD-8 b. Provide a similar analysis for Test Year 2. Provide all spreadsheet analyses and work papers with cell formulas intact associated with the response.
- PLUG-PWD-9 c. Reconcile the increases shown in parts a. and b. to the Water Increases shown on the top of PWD Statement 7, page 11 of 63, line 3. If these amounts do not reconcile, provide a detailed proof of revenues showing the increases by customer type that constitute the water increases shown on page 11 for FY 2026 and FY 2027. Show the application of present and proposed rates and billing determinants by customer type, with present revenues and proposed revenues that result in the increases shown on page 11. Provide all spreadsheet analyses and work papers with cell formulas intact associated with the response.
- PLUG-PWD-10 a. Explain how Black and Veatch (B&V) followed the results of the adjusted class cost of service amounts in Column 2 of Table 4-12, Schedule BV-2 to the design of proposed rates as shown on Tables 5-1 and 5-2.
- PLUG-PWD-11 b. Describe all differences between the allocated class COS amounts in Column 2 and the actual increases and/or decreases resulting from BV's proposed water service rates for each class. Provide a detailed explanation for the deviation between allocated class COS and actual customer type revenues resulting from BV's proposed water service rates.

- PLUG-PWD-12 If not previously provided, provide the detailed class cost of service study for wastewater and stormwater services included in Section 7.0 of Schedule BV-2. Provide all spreadsheets and supporting work papers with cell formulas intact.
- PLUG-PWD-13 Refer to the Wastewater Increases shown on the top of PWD Statement 7, page 11 of 63, line 4. Provide a detailed proof of revenues showing the increases by customer type that constitute the wastewater increases shown on page 11 for FY 2026 and FY 2027. Show the application of present and proposed rates and billing determinants by customer type, with present revenues and proposed revenues that result in the increases shown on page 11, line 4. Provide all spreadsheet analyses and work papers with cell formulas intact associated with the response.
- PLUG-PWD-14 Refer to the Annual Increases shown on PWD Statement 7, page 11 of 63, line 12. Provide a detailed proof of revenues showing the increases by customer type that constitute the increases shown on page 11 for FY 2026 and FY 2027. Show the application of present and proposed rates and billing determinants by customer type, with present revenues and proposed revenues that result in the increases shown on page 11, line 12. Provide all spreadsheet analyses and work papers with cell formulas intact associated with the response.

Respectfully submitted,

McNEES WALLACE & NURICK LLC

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