

**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-X-1. Reference the June 21, 2023 Rate Determination at 41 (discussing Mr. Mierzwa's proposal that all customers share in SMIP/GARP billing credits as part of the stormwater rate structure). Please provide PWD's presentation and response to this proposal, as required by the Board's 2023 Rate Determination.
- PA-X-2. Reference the June 21, 2023 Rate Determination at 41 (discussing Mr. Mierzwa's proposal that PWD's residential stormwater rate design provide for charges based on residential building type). Please provide PWD's presentation and response to this proposal, as required by the Board's 2023 Rate Determination.
- PA-X-3. Reference the June 21, 2023 Rate Determination at 41 (discussing Mr. Mierzwa's proposal that PWD evaluate whether rate discounts should be provided to residential customers managing stormwater using 24-inch rain barrels). Please provide PWD's presentation and response to this proposal, as required by the Board's 2023 Rate Determination.
- PA-X-4. Reference PWD St. 7, page 43 ("Since the last rate proceeding, OPA has updated their data schema"). Please provide a full description of how OPA's data schema has been updated and the date upon which each applicable update occurred. Include an explanation of how and to what extent underlying data has changed and the extent (i.e., percentage of residential parcels affected, percentage of commercial parcels affected, etc.) to which underlying data has changed. If OPA's data schema has not modified underlying parcel data, please explain why OPA's schema has impaired PWD's ability to update the stormwater customer classification system.
- PA-X-5. Reference PWD St. 7, page 43 ("Staff are also exploring if additional fields can aid in refining classifications which might be leveraged in future updates"). Is refining classifications in stormwater mapping necessary to identify differences in residential property types (e.g., rowhouse, semi-detached, etc.)? If so, please explain any existing limitations on identifying differences in residential property types within the current stormwater billing system.

- PA-X-6. Reference PWD St. 7, page 43 (“Staff are also exploring if additional fields can aid in refining classifications which might be leveraged in future updates”). Is refining classifications in stormwater mapping necessary to identify residential properties with 24-inch rain barrels? If so, please explain why PWD would not be able to use its records of rain barrel installation to present and respond to Mr. Mierzwa’s proposal for bill credits for customers with such rain barrels, as required by the Board’s 2023 Rate Determination.
- PA-X-7. Reference PWD St. 7 at 44 (“The City is in the process of issuing a request for proposals to identify a billing system vendor.”). Is PWD aware that Philadelphia Gas Works (PGW) ongoing billing system replacement project is on track to take eight years or longer and has exceeded budget projections by more than 200%? What efforts is PWD undertaking to ensure that its billing system replacement project does not experience delays and cost overruns like PGW’s?
- PA-X-8. Reference PWD St. 7 at 44 (“The replacement of the billing system is expected to take place over several years.”). Is it PWD’s position that despite the Rate Board’s directive to present and respond to Mr. Mierzwa’s recommendations in this general rate proceeding, any potential modifications to the stormwater billing system should only be undertaken after PWD completes its billing system replacement project? If so, please explain why, if modifications would provide for a more equitable sharing of costs now, such changes should be delayed by several years?