

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

**In the Matter of a Proposed Rate Increase in** :  
**Water, Sewer and Storm Water Rates** : **FY 2019-2021 Rates**

**Philadelphia Land Bank's Interrogatories & Requests for Production of Documents  
Set I**

- LB-I-1. Please describe and explain in detail whether, and to what extent, any Philadelphia Water Department ("PWD") charges (including, without limitation, water, sewer, and storm water) (collectively, "PWD Charges") are abated for *vacant* properties owned by the City of Philadelphia or the Philadelphia Department of Public Property (collectively, "City"), Philadelphia Housing Development Corporation ("PHDC"), the Philadelphia Redevelopment Authority ("PRA"), or the Philadelphia Housing Authority ("PHA").
- LB-I-2. If any PWD Charges are either fully or partially abated for properties owned by the City, PHDC, PRA, or PHA, please
- a. Indicate the ordinance, law, rule, or regulation applicable to the City, PHDC, PRA, and PHA which provides for an abatement of any PWD Charges (each "Applicable Law" and collectively "Applicable Laws");
  - b. Explain in detail if an abatement under any Applicable Law applies to water, sewer, stormwater, all, or any of them, and whether it is a full or partial abatement;
  - c. Explain in detail the basis for an abatement under each Applicable Law;
  - d. Explain in detail those qualifications or requirements, if any, that must be satisfied in order for the City, PHDC, PRA, and PHA to receive an abatement of PWD Charges under each Applicable Law (*e.g.*, must the property be vacant or unoccupied);

- e. Explain in detail what request, paperwork, or submission, if any, is required from the City, PHDC, PRA, or PHA in order to receive an abatement of any PWD Charges under any Applicable Law and any deadlines associated with such request, paperwork, or submission;
- f. Provide for each of the last five (5) fiscal years the total number of properties and the total amount (in dollars) of foregone (abated) revenue by (i) owner, (ii) type of abatement (*e.g.*, water, sewer, stormwater), and (iii) full or partial.

LB-I-3. Once a property owned by the City, PHDC, PRA, or PHA is conveyed to the Philadelphia Land Bank ("Land Bank"), please describe and explain in detail when PWD begins billing the Land Bank for (i) water, (ii) sewer, (iii) stormwater; and (iv) any other charges.

LB-I-4. Please provide any financial studies or analysis pertaining to foregone revenue due to abatement of any PWD Charges for properties owned by the City, PHDC, PRA, or PHA.

LB-I-5. Please provide in an MS Excel worksheet a detailed table containing for the past five (5) fiscal years:

- a. The total number of properties billed for stormwater located in Philadelphia County, which do not receive any abatement of stormwater charges.
- b. The total billable gross area (sq. ft.) for the properties identified in LB-I-5.a;
- c. The total billable impervious area (sq. ft.) for the properties identified in LB-I-5.a;
- d. The total stormwater revenue (in dollars) for the properties identified in LB-I-5.a.
- e. The total number of properties located in Philadelphia County that receive a full abatement of stormwater charges.
- f. The total billable gross area (sq. ft.) of those properties identified in LB-I-5.e.

- g. The total billable impervious area (sq. ft.) of those properties identified in LB-I-5.e.
  - h. The total amount (in dollars) of foregone (abated) stormwater revenue for those properties identified in LB-I-5.e.
  - i. The total number of properties located in Philadelphia County that receive a partial abatement of stormwater charges;
  - j. The total billable gross area (sq. ft.) of those properties identified in LB-I-5.i.
  - k. The total billable impervious area (sq. ft.) of those properties identified in LB-I-5.i.
  - l. The total amount (in dollars) of foregone (abated) stormwater revenue from those properties identified in LB-I-5.i.
- LB-I-6. Please describe and explain in detail how PWD determines any direct costs (other than actual usage) for those properties owned by the City, PHDC, PRA, or PHA that receive a full or partial abatement of any PWD Charges.
- LB-I-7. Please provide in an MS Excel worksheet a detailed table containing the amount of the direct costs identified in LB-I-6 for the past five (5) fiscal years.
- LB-I-8. Please provide in an MS Excel worksheet a detailed table containing for the past five (5) fiscal years:
- a. The total number of properties owned by the Philadelphia Land Bank and billed for stormwater charges.
  - b. The total billable gross area (sq. ft.) for the properties identified in LB-I-8.a;
  - c. The total billable impervious area (sq. ft.) for the properties identified in LB-I-8.a;
  - d. The total stormwater revenue (in dollars) for the properties identified in LB-I-8.a.

LB-I-9. Please provide in an MS Excel worksheet a detailed table containing for the past five (5) fiscal years:

- a. The total number of properties owned by each of the City, PHDC, PRA, and PHA which receive a full or partial abatement of stormwater charges.
- b. The total billable gross area (sq. ft.) of those properties identified in LB-I-9.a for each owner.
- c. The total billable impervious area (sq. ft.) of those properties identified in LB-I-9.a for each owner.
- d. The total amount (in dollars) of foregone (abated) stormwater revenue for those properties identified in LB-I-9.a for each owner.

LB-I-10. Please describe and explain in detail those one-time and recurring PWD Charges, if any, a customer is required to pay after that customer has requested to have their water and sewer service suspended or turned-off.

LB-I-11. Please describe and explain in detail when a customer would no longer be liable for PWD Charges except for stormwater.