

BEFORE THE
PHILADELPHIA WATER COMMISSIONER

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| In the Matter of the Philadelphia Water Department's Proposed Increase in Rates for Water and Wastewater Utility Services | FY 2009-2012 |
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**DIRECT TESTIMONY OF
BRADY RUSSELL
ON BEHALF OF CLEAN WATER ACTION**

DATED: December 11, 2008

1 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2 A. My name is Brady Russell and my business address is 1315 Walnut St, Suite 1650,
3 Philadelphia, PA 19107.

4 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5 A. I am the Eastern Pennsylvania Director for Clean Water Action, supervising our
6 Philadelphia and Allentown Offices. We have thousands of members in Southeast
7 Pennsylvania and hundreds all over Philadelphia.

8 We focus primarily on issues as they relate to water (both drinking water and water in
9 wilderness and/or for recreation). We also concern ourselves with other issues as they
10 relate to the environment. We are a national organization that has been in Philadelphia for
11 over twenty years, with approximately 100,000 members across the state.

12 **Q. PLEASE EXPLAIN YOUR INTEREST IN THESE PROCEEDINGS.**

13 A. Clean Water Action supports any effort to improve stormwater management practices in
14 the city, especially if it leads to more sustainable approaches. We appreciate the Water
15 Department's forward thinking methodology, changing the incentive structure so that
16 those generating the greatest run-off have the greatest incentive to curtail it.

17 We also believe that there is an opportunity to make a plan to incentivize similar
18 improvements from homeowners and neighborhoods.

19 **Q. HAVE YOU REVIEWED THE STORMWATER COST REALLOCATION
20 PROGRAM THAT THE PHILADELPHIA WATER DEPARTMENT HAS
21 PROPOSED AS PART OF THESE PROCEEDINGS?**

22 A. Yes.

23 **Q. DO YOU SUPPORT THAT PROGRAM?**

1 A. Yes. The stormwater cost reallocation program that the Philadelphia Water Department
2 has proposed is largely consistent with the recommendations made by Next Great City, a
3 coalition that Clean Water Action joined early on. Under the proposed program,
4 stormwater fees would be based on the characteristics (gross size and imperviousness) of
5 a property, and credits would be offered to incentivize onsite stormwater management.

6 **Q. DO YOU HAVE ANY RECOMMENDATIONS FOR IMPROVING THE**
7 **STORMWATER COST REALLOCATION PROGRAM?**

8 A. Yes. Under the proposed program, stormwater credits are only available for non-
9 residential customers. We believe that there should be some form of stormwater credit
10 available for residential customers who implement SMPs that reduce their contributions
11 to the stormwater problem. Such credit would be fairer to residential customers, whose
12 rates, like those of non-residential customers, should reflect any reductions they make to
13 the amount of runoff that their properties contribute to the stormwater problem. Such
14 credit also would create an incentive for residential customers to reduce the amount of
15 stormwater that runs off of their properties. Taken as a whole, runoff from residential
16 properties contributes significantly to our stormwater problem, so reducing such runoff
17 should be a part of any solution aimed at addressing that problem.

18 Again, the Philadelphia Water Department is joining a group of forward thinking cities.
19 We ask that they join the ranks of the most forward thinking cities and create an incentive
20 to collectively slow the flow of stormwater runoff.

21 **Q. DOES THIS CONCLUDE YOUR PREPARED TESTIMONY?**

22 A. Yes, it does.