



# CITY OF PHILADELPHIA

LAW DEPARTMENT  
One Parkway  
1515 Arch Street  
Philadelphia, PA 19102-1595  
Diana P. Cortes, City Solicitor

February 22, 2022

Honorable Darrell L. Clarke, President  
City Council of Philadelphia  
City Hall Room 313  
Philadelphia, PA 19107

Re: City of Philadelphia Water and Wastewater Revenue Bonds  
Twenty-Sixth Supplemental Ordinance (Bill No. 220079)

Dear Council President Clarke:

The office of the City Solicitor has reviewed The First-Class City Revenue Bond Act, the Amended and Restated General Water and Wastewater Revenue Bond Ordinance of 1989 (Bill No. 544) approved June 24, 1993, as supplemented (the "General Ordinance") and the proposed Twenty-Sixth Supplemental Ordinance thereto, Bill No. 220079 (the "Twenty-Sixth Supplemental Ordinance"). The General Ordinance and the Twenty-Sixth Supplemental Ordinance authorize the issuance and sale of (i) one or more series or subseries of Water and Wastewater Revenue Bonds of the City of Philadelphia in the maximum principal amount of One Billion Dollars (\$1,000,000,000), and (ii) one or more series or subseries of Water and Wastewater Revenue Refunding Bonds of the City of Philadelphia for the purpose of refunding only bonds issued under the Twenty-Sixth Supplemental Ordinance (collectively, the "Bonds").

Based on that review, it is my opinion that under the General Ordinance and the Twenty-Sixth Supplemental Ordinance, as introduced in Council, the registered owners of any series or subseries of the Bonds will have no claim upon the taxing power or general revenues of the City of Philadelphia, nor will they have any lien upon any property of the City of Philadelphia other than the Project Revenues (as defined in the General Ordinance) and the funds properly pledged to such registered owners pursuant to the terms and conditions of the General Ordinance and the Twenty-Sixth Supplemental Ordinance.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Cortes", with a long horizontal flourish extending to the right.

Diana P. Cortes  
City Solicitor